

6 May, 2024

Dear Minister Eamon Ryan,

We write to you as a transatlantic group of organisations from Ireland and the United States to clearly state our opposition to the Energy Security Review's support for a new state-backed liquified natural gas (LNG) import terminal for emergency gas supply. As environmental organisations, we believe that you, as the leader of the Green Party, should not support building one of the largest pieces of fossil gas infrastructure in Ireland. We are gravely concerned that building a floating LNG import terminal threatens the existing government policy that places a moratorium on fracked gas imports and LNG. Furthermore, doing so may result in future governments locking Ireland into disastrous fossil fuel infrastructure at the very time when we must get off gas completely and transition to clean energy sources.

We are also concerned that you have charged Gas Networks Ireland (GNI) with examining a proposal to build a new state-backed floating LNG terminal. We do not have confidence in GNI to independently address these risks as part of their analysis given their vested interest in maintaining or increasing gas supply, an issue previously raised with Government. Given GNI's exclusive focus on gas network expansion and its economic interests in maintaining and increasing gas supply, we have no confidence that GNI will adequately integrate fossil gas phase out. We are raising this complaint with you as GNI has repeatedly failed to align its network plans and gas demand scenarios with the state's carbon budget programme.

Furthermore, we oppose your direction to GNI to develop a plan that is limited to an emergency gas storage in the form of a floating LNG import terminal. The Energy Security Review states in Action 14 that underground storage in the South-West Kinsale reservoir will also be subject to further research and must also be considered as part of any analysis on an emergency reserve.

We call on you to instruct GNI to immediately stop its work on examining a proposal to build a state-backed floating LNG import terminal. We also call on you to direct the Commission for Regulation of Utilities (which is already obliged to carry out energy security assessments) to conduct an independent review of safety, national security, and climate risks of a floating LNG terminal and other storage options with input from the Climate Change Advisory Council.

As we have noted in previous letters and reports sent in [July 2023](#) and [November 2023](#), if national security risks are one of the driving factors behind the proposal to have backup gas reserve for emergency usage then, LNG terminals pose an equal or greater national security risk given that they constitute visible targets that could be attacked more easily than a pipeline or underground gas storage like Kinsale.

At the May 30th Oireachtas Committee on Environment and Climate Action on "Liquefied Natural Gas and Oil Prospecting", expert witness Professor Barry McMullin, Faculty of Engineering and Computing at Dublin City University, [stated](#), "In terms of geopolitical risk, any geopolitical actor that has both the means and interest in attacking the gas connection infrastructure between Ireland and the UK, by definition, has the means and interest to attack LNG import infrastructure. Therefore, LNG import infrastructure does not actually mitigate that geopolitical risk." LNG is a major national security risk and LNG terminals [have been identified](#) by the United States Congressional Research Service as a potential terrorist target. Indeed, national security was one of the main reasons why New York rejected an LNG import terminal.

In the United States this February, President Joe Biden acknowledged the myriad problems

posed by LNG and stopped approval of new LNG exports as he directed the US Department of Energy to review LNG's national security, economic, and climate risks and impacts. We call on you to begin a similar robust process of independently reviewing the public safety, national security risk, economic and the climate impacts of an LNG import terminal.

There are two main locations in Ireland where an LNG import terminal could be built: in Cork and the Shannon estuary. In the event of a LNG terminal incident, in which LNG can ignite with uncontrollable fires that are so hot that [they can burn people up to a mile away](#), both these locations would have catastrophic casualties and deaths in Cork or Kerry and Clare. Yet, despite multiple letters expressing these concerns, LNG was not considered a national security risk and public safety was not considered in the Energy Security Review, instead LNG is the preferred option.

As head of Ireland's delegation at COP 27 and 28, you are well aware that LNG is extremely damaging for the climate. New scientific research from Cornell University Professor Robert Howarth finds that LNG is at least 24% worse for the climate than coal. A recent joint [letter](#) from more than 170 scientists describes how LNG facilities are inherently leaky operations, prodigious emitters of methane, and terrible for the climate.

In Action 17 of the Energy Security Review, it notes that any gas reserve must be transitional, state-led, for emergency use, not increase demand and must be in compliance with the 2021 Climate Act. It is imperative that any emergency gas reserve would be subject to these strict climate-related conditions and we call on you to codify these in an enduring and binding manner (legislative or regulatory), not merely policy, before any decision is made on gas reserve and before the end of the current Government's term. These conditions must also stipulate that any storage option will not facilitate, or be dedicated to, gas imports from fracking, in line with the Government's 2021 Policy Statement and the Programme for Government commitment.

In closing, to protect the environment, public health, and meet our climate commitments, we ask that you:

- 1. Instruct GNI to immediately stop its work on examining a proposal to build a state-backed floating LNG import terminal.**
- 2. Direct the Commission for Regulation of Utilities to conduct an independent review of safety, national security, and climate risks of a floating LNG terminal and other storage options with input from the Climate Change Advisory Council, including underground storage in the South-West Kinsale reservoir given that the Energy Security review states it will also be subject to further research and must also be considered as part of any analysis on an emergency reserve.**
- 3. Immediately codify Action 17 of the Energy Security Review in an enduring and binding manner (legislative or regulatory) that any emergency gas reserve must not increase demand and must be in compliance with the 2021 Climate Act before any decision is made and before the end of the current Government's term.**
- 4. Institutionalise the Government's 2021 Policy Statement and the Programme for Government commitment to ban the import of fracked gas.**

Yours sincerely,

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