

Not Here, Not Anywhere Submission on the Climate Emergency Bill 2018



Dear Deputies and Senators,

Please find below a short briefing on the reasons to pass through the Petroleum and Other Minerals Development (Amendment) (Climate Emergency Measures) Bill 2018.

Ireland has no oil and gas industry and the likelihood of building one is slim. Instead, we call for investments to be made in viable industries such as seafood, tourism and renewable energy.

There is nothing to be found in the Irish offshore, and the damage done in searching for it through seismic testing and climate change far outweighs the potential results.

Instead, investment must be in renewables and energy efficiency to reduce reliance on imported fossil fuels. Government has wasted enough resources on an offshore fossil fuel industry that has little to offer.

Many of our group are under the age of 30; we have never lived on a safe planet, and have lived our entire lives under the UNFCCC climate negotiations themselves.

We have a chance for Ireland to become a leader on climate change and to stop needless damage with the Climate Emergency Bill from Deputy Smith appearing before the Joint Oireachtas Committee on Wednesday. This will ban all new oil and gas licences. Even pop star Cher herself [supports the Bill](#). Like Costa Rica and New Zealand let us move forward to a better, safer world.

The facts are as follows:

1. Firstly, the likelihood of deposits is low yet existing and potential damage is high

After a long hiatus, last summer Providence Resources drilled for oil in the Porcupine Basin off the South West coast of Cork and Kerry. Significant public relations work was done to claim that 5bn barrels of oil would be found. On the 4th of August, not only was nothing found but a watery well, but shares in Providence Resources [fell 46%](#).

Out of [just under 160 wells drilled since 1962](#), only 2 commercial discoveries have been found. This is a record low that has existed in a country with the [second most attractive](#) fiscal terms in the world and a governing Petroleum Affairs Division (PAD) [that has never once conducted an Environmental Impact Assessment of industry activities offshore](#) and has potentially the most lax regulation of seismic testing in the world.

Gas has been found off Kinsale in 1971, and Corrib in 1996, but they are no example to follow. Not only was there a 25 year gap between discoveries, but both fields resulted in massive reputational damage to the industry and social and political upheaval. Corruption and a lack of concern for public or environmental safety dogged the project - finally leaving Shell with [losses of €2.5bl.](#)

The number one reason why fossil fuel companies operating in Ireland can't secure a business partner is because there is simply nothing there. The [Irish Offshore Operators Association](#), Providence Resources and [PwC](#) have all admitted there is only a 1 in 30 or 1 in 40 chance of finding anything commercial. According to the 2012 [Oireachtas Committee Offshore Oil and Gas Exploration Report](#) Ireland has a 4.8% overall success rate for a commercial find (page41). Compared to a 1 in 7 chance in Norway and 1 in 6 for the UK. Even the Government's own [2012 Harnessing Our Ocean Wealth](#) policy lists offshore oil and gas as having not only the lowest growth potential of any marine industry, but a minus growth of -4.8% (page 9).

Another major factor to keep in mind is that the fields with the most potential have already been given out. For constitutional reasons this Bill **does not revoke** the licences for Barryroe – which may be drilled later this year) or other fields that have been licenced continuously for decades. Many licences for the best sites, such as the current Barryroe gas field, [were granted as far back as the 1975 licencing round](#) which required companies to drill at least once exploratory well within three years. Despite this, nothing was found for 25 years until Corrib in 1996. Even Barryroe itself has been previously drilled and no commercially viable fields were found.

Indeed, many of the licences that have already been given out are extremely generous. Under the 2011 Licencing Round awarded companies can hold licences for 47 years – up until the year 2058. This is far beyond the zero-carbon 2050 scenario demanded by EU and UN climate agreements. Why, in an economy moving quickly towards renewables do these small Irish companies need anything more than what they have?

The answer is that the fossil fuel industry in Ireland is a speculative one that is driven by attractive tax incentives that can write off your tax on other activities. It is small Irish companies attracting investment from bigger players and getting a cut. In fact, industry outsiders have informed us that much of the money is now being made in selling seismic studies offshore, further information on the damage of seismic testing is below. also that the fields with the most potential have already been given out

a. Damage from seismic testing is high cost for low reward

No doubt [arguments of 'nothing there'](#) served the industry well when [seeking a non-existent tax rate and countering public demands](#) that the Irish State should own its own energy resources. An argument made in [Oireachtas hearings](#) and [newspaper articles](#) by Fergus Cahill – former chairman of the Irish Offshore Operators Association (and a former employee of the Petroleum Affairs Division).

However, the evidence is mounting that fossil fuel exploration causes damage that far outweighs its potential and new decisions must be made on the viability of the industry, and wisdom of continuing to facilitate it.

To map the seabed for fossil fuel deposits, sonic cannons, also known as seismic airguns, are towed behind boats creating dynamite-like blasts— repeated every ten seconds, 24 hours a day, for weeks and months at a time. At acoustic levels 100,000 times more intense than a jet engine.

As highlighted by the Irish documentaries [Ireland's Deep Atlantic](#) and [Atlantic](#) the film, seismic blasts are essentially [“waves of death”](#) that cause disorientation and internal bleeding for [distances of up to 100 miles](#). Causing unknown damage to the 24 species of whales, dolphins and porpoises that use Ireland's seas as a migration route and mating ground.

[New evidence from Nature Journal in 2017](#) shows that a single blast kills 100% of zooplankton larvae – the basis of the marine ecosystem - and 64% of adult krill for at least 0.7 miles (the study was only conducted up to this point and damage could be prevalent at longer distances). This is merely the most recent of [many peer-reviewed scientific studies](#) showing the extensive effects of seismic testing on all levels of the ocean food-chain. As long as ten years ago in 2007, [the International Whaling Commission found that 250 male fin whales](#) appeared to stop “singing” for up to several months during seismic testing.

Yet the Petroleum Affairs Division [has not updated their guidelines](#) to incorporate this new information, though seismic testing conducted in Ireland is likely to be the most dangerous in the world according to a new case being taken by a marine mammal expert to the European Commission.

Ireland's seismic testing is likely to be the most dangerous in the world as the guns are not shut off as the boat turns, even though the data collected is not useful during such turns. This effectively means that around a quarter of the blasts from seismic testing in Irish waters are unnecessary. This issue we have been told by marine mammal observers has been raised by the oil and gas industry itself with the Parks and Wildlife Service and the PAD.

The damage is again exacerbated by the fact that it is unclear who has overall responsibility for monitoring industry operations. This is an issue documented by Dr. Amanda Slevin in her previous contribution to the Committee on the 3rd of July. The

PAD is a body that regulates, promotes Ireland as a destination for oil and gas, and monitors the industry for the environmental and social protection purposes. These conflicting responsibilities were most evident in the Corrib scandal, where regulation was extremely lax despite serious environmental and health concerns – one example being [facilitated project-splitting on environmental impact assessments](#). The European Commission [has also previously come out](#) against the State's licensing of seismic testing.

Today, this lax regulation is now becoming evident as [fishing communities](#) in [Kerry and Galway](#) are [coming out against seismic testing](#). This is nothing new; fishermen from [Norway](#) to [New South Wales](#) have had to do the same due to the [well-documented strength](#) of fossil fuel lobbying.

The full damage being done in our offshore waters is as yet unknown - the Irish Whale and Dolphin Group [reported 2017](#) as the worst year on record for beach strandings with a 30% rise in dolphin deaths. Fewer fin and blue whales have also been recorded in the Porcupine Basin – potentially a key mating ground - since seismic testing began there in 2013. Ireland's seas have been a whale and dolphin sanctuary since 1974 and the world's known population of 250,000 bottlenose dolphins come to the Irish Atlantic every year. Yet the Minister has not once exercised his powers to [conduct an Environmental Impact Assessment of industry activities offshore](#).

Recommendation: A cumulative EIA is required that takes into account the extensive damage done by seismic over the past five years at least. A full moratorium on exploration activity until fish-stock, wild-life and climate scenarios recover is required.

2. Climate Change is a growing concern

Ireland's seas are some of the [most inhospitable in Europe](#) with major storms and difficult geology that make them impossible for present fossil fuel technology. Technology unlikely to ever be developed due to climate change targets.

The majority of the world's countries (193 to be exact) agree with 97% of scientists that we need to keep global temperatures below a 1.5C or 2C degree rise to avoid catastrophic climate change. In practice, this is widely known to mean that [75 to 80% of the known fossil fuels have to stay in the ground](#). As stated [by the IEA in 2012](#) (page 3), *"No more than one-third of proven reserves of fossil fuels can be consumed prior to 2050 if the world is to achieve the 2 °C goal, unless carbon capture and storage (CCS) technology is widely deployed."* Ireland's fossil fuel resources are unknown, and therefore unusable.

The millions that it costs to set up new fossil fuel infrastructure represent what the Bank of England calls "stranded assets" due to technology changes, market developments, and policy development based on agreed international climate

targets. In the past five years investment funds, public institutions and individuals have divested around US\$6.15 trillion (£4.6 trillion) of fossil fuel assets and the Irish Government itself is fast-tracking Trócaire and Thomas Pringle's Fossil Fuel Divestment Bill to divest the state pension fund from fossil fuels. Any investment in further fossil fuel infrastructure, instead of renewables, locks in reliance on a flailing industry.

a. Cost-benefit analysis of Irish fossil fuel industry shows its impotence

Any simple cost-benefit analysis of the Irish fossil fuel industry shows that there is no point in continuing to facilitate it

The future cost to the State of coping with the effects of climate change [will run into billions of euro each year](#) according to the Government's [National Adaptation Framework \(page 47\)](#). Climate inaction will also [cost billions](#) as the European Commission will charge us as much as €600 million annually if we continue missing climate targets after 2020.

There is not even a wealth of taxes to be gained from the industry to pay for these costs. Ireland has the second lowest rate of return to the State among 74 countries. As outlined by Dr. Amanda Slevin's submission, new licences are subject to a 25% tax. A separate production tax introduced in 2014 could see the State take rise to 40-55 per cent. All taxes on profits can be written off against costs. The take in sub-Saharan Africa ranges from 44% to 85%. However, many oil and gas licences like Newgrange in ecologically sensitive Porcupine Seabight, or the Kish Basin near the Dun Laoghaire Forty Foot, were given out [before 2013](#) and benefit from a historic no-tax regime set up to encourage investment in exploration. As a result, if there is an unlikely success, the millions of euro that are being poured into exploration by Providence Resources and others will wipe out any Government tax bill.

Despite its privatisation, the fossil fuel industry appears to still have been extremely costly for the Irish Government. In a 2013 debate on the Report on offshore Oil and Gas Exploration, [Labour Senator John O'Reilly stated](#) that the Irish Government had spent €5 billion on exploration, and have generated only €1.8 billion in revenue. This was after Corrib gas field had been found, and all gas from that site was to be sold at full market price to the state.

Whatever paltry taxes that remain have also been undermined by Government spending to facilitate the oil and gas industry. One egregious example is the Regional Seismic Survey which was originally a ["jointly funded"](#) project between the Department of Climate Action and ENI Ireland ([a fossil fuel company currently embroiled in a Nigerian human rights scandal](#)). Government and industry were to share the €20 million cost of mapping the sea-floor with dangerous seismic testing. Not only did the industry bail, [giving only €3.99million on the project](#) – but left the indigenous Irish fishing industry to pick up the leftover mess of depleted plankton and fish stocks.

[As revealed by Green News journalist](#) Niall Sargent, since 2007-2016 the DCCAE has given €250,000 for scholarships under a [MSc Scholarship Scheme in Petroleum-](#)

[Related Courses](#). No funding has been issued for any environmental-related scholarships during this period.

Recommendation: Investment instead must be in clean, renewable industry.

3. Energy Security is a diversionary point

The industry and the Department state that we need to allow private industry to drill Ireland offshore for reasons of energy security; as circa 85.3% of our energy is currently imported. However, extraction of oil and gas from the Irish Sea is not a profitable endeavour for the Irish State, even if anything was there to be found. Fossil fuel extraction is a privatised industry and any fuel found in Irish seas will go to the highest bidder, not to the Irish people.

Exploration in Irish waters (or indeed onshore) will not improve our security of supply. Our licensing terms do not require companies who find oil or gas in our waters to supply the Irish market. They are not even obliged to land it in Ireland.

With the prospect of much of the fuel being immediately shipped overseas with the development of new technologies such as Liquefied Natural Gas (LNG), it is likely our resources will boost the security of supply of other countries, more than our own.

Economist Colm Rappale [wrote on July 1st, 2007](#): “They are not even required to land it in Ireland if it doesn’t suit them and in the case of a small oil find it could make financial sense to simply pump the oil up to waiting super tankers for shipment to refineries in Britain or elsewhere.”

Ireland [has no oil refineries](#) due to fall in demand, and planned drill sites such as the Newgrange prospect are located [roughly 260 km](#) off the south-west coast of Ireland. Other prospects such as Barryroe are closer [at 50km offshore](#) but LNG will most likely be used to avoid expensive community upheaval such as in Corrib which was 75km offshore. As stated above, the debacle left Shell with [losses of €2.5bl](#).

Fossil fuels are also a fungible international market and there is no need for us to drill for unlikely and dangerous deposits off the Irish coast. Most of our gas already comes from friendly neighbours in Scotland, Norway, Belgium, not Russia, and we have more than enough to last us to the extent demanded by climate targets.

And there is much evidence to suggest that the global supply of fossil fuels will be limited as we move closer and closer to two degrees of global warming. Globally, accessible fossil fuel resources are depleting and extraction costs are increasing, making investors increasingly wary of environmental-related risk exposure. In December 2017 the World Bank announced that it would not be financing oil or gas extraction beyond 2019.

In the last year France and New Zealand have joined Costa Rica and Belize in deciding to ban future permits for fossil fuel extraction. As we get closer to the 2050 deadline set by the Paris Agreement, and as it becomes clear that most countries are

far from their emissions reduction targets, attempts to limit global fossil fuel supplies in order to protect the environment are set to increase.

On 14th June in his keynote speech at the GIE Annual Conference, Klaus Dieter Borchardt, Director of the EU's internal energy market, said that instead of investing in new fossil fuel infrastructure, the EU should concentrate on using existing infrastructure in the most effective way, noting [that "\[t\]he old approach to infrastructure where we say that the more infrastructure we have, the better the security of supply – these times are over"](#). New fossil fuel infrastructure will lock us in to decades more fossil fuel use. Existing infrastructure will tide us over if we start moving towards a renewable future quickly and fearlessly. The response of Denmark to the 1970s oil crisis was to invest in wind.

However, there is a security of supply issue, albeit a minor one. All our imported gas does reach us through one pipeline in Scotland. There is a tiny risk that transmission through this pipeline could be interrupted due to damage to this onshore pipeline. This is a "very low probability event", according to John FitzGerald and Laura Malaguzzi Valeri of the ESRI ([Irish Energy Policy: An Analysis of Current Issues, October 2014](#), page 42). Government has also been advised to "develop a strategy to replace Corrib once the field begins to run down in the early years of the next decade". Seeking another gas field is only part of this and longer-term strategies must be found, such as promoting Ireland as an investment destination for renewables with a long-term commitment to that area.

This dependence on other countries is to remain, even if there was the unlikely finding of more gas and even with Brexit. As stated by ESRI economist Muireann Á. Lynch ([Research Note: Re-evaluating Irish energy policy in light of Brexit, page 6](#)), while "the Corrib field met 55 per cent of demand in its first year of operation, the Moffat link with Great Britain is expected to be re-established as the dominant gas supply point from as early as 2018 onwards". Ireland and the UK also have separate intergovernmental agreements from 1993 and 2003 on sharing gas supplies. The ESRI also cautioned against an overt focus on Brexit security of supply arguments and instead called for focus on advancing energy and climate policy.

Recommendation: It would be better to invest in reducing our largely needless energy wastage through energy efficiency targets, as outlined by the [SEAI Energy Report 2016](#), biogas for heating and invest in renewables.

By banning further oil and gas licences we will promoting Ireland as an investment destination for renewables with a long-term commitment to that area.

4. Jobs potential is miniscule and falling worldwide

As stated above, in 2016 the oil and gas industry provided a mere 265 jobs. [SIPTU and other trade unions](#) have regularly highlighted how few jobs are provided to Irish people by offshore fossil fuel companies. The jobs potential into the future will be

even less as new technologies such as LNG mean the industry can ship anywhere in the world straight from the site - never having to come ashore.

Globally, at least [450,000 people have lost their jobs in oil and gas worldwide since 2014 - 124,000 in the UK's North Sea alone](#). Scotland and the UK are already working to provide a 'just transition' to green jobs for workers in the North Sea. Government is failing oil and gas workers by continuing to support one of [the fastest automating industries on the planet](#) - infamous [for its efforts to undermine worker's rights](#).

As stated above, in 2016 the Irish offshore fossil fuel industry provided a mere 265 jobs, while the seafood industry it directly threatens provided 11,000. The hashtag #TasteTheAtlantic on Twitter, Facebook or Instagram will show you the amazing small to medium enterprises that are using the value of our fresh, clean fish, shellfish and seaweed. Small producers sell our high quality produce to national and international markets – creating high quality jobs in often hard hit rural areas. Government cannot allow a completely unproductive industry drill along our Atlantic coast. Even if only tiny amounts of oil are found, these wells produce toxic chemicals like benzene, arsenic, and radioactive pollutants, and toxic metals like mercury and lead that may accumulate in our seafood supply.

Recommendation: A just transition for fossil fuel workers and investment in the wealth of jobs to be found in retrofitting and other energy efficiency measures as outlined by [trade unions](#) and economists [David Connolly](#) and [Joseph Curtin](#).

Conclusion

Thank you for taking the time to read our submission. Should you have any questions on the above please feel free to contact us by email at nothere.notanywhere@gmail.com.

Thank you for your time and engagement on this matter.

This submission was written by Sinéad Mercier