Not Here Not Anywhere
www.notherenotanywhere.com
T:@NHNAireland
I:@notherenotanywherenhna
F:@notherenotanywhereNHNA
For a fossil free future for Ireland

Geoscience Regulation Office,
Department of the Environment,
Climate and Communications,
29-31 Adelaide Road,
Dublin,
D02 X285,

07 March 2022

Public Consultation: Application for decommissioning of certain facilities within the Kinsale Area gas fields

Submission - Not Here Not Anywhere

This submission is made on behalf of Not Here Not Anywhere (NHNA), a nationwide, volunteer-grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland and across the world. We advocate for fair society-wide energy usage and a just transition to renewable energy systems.

NHNA welcomes the decommissioning of certain facilities within Kinsale Area gas fields however we argue that the Kinsale Head Consent Application No. 3 — which requests consent to leave *in-situ* the 24" export pipeline and all infield pipelines — along with the Seven Heads gas field application, will allow for the decommissioned pipelines to be used for future fossil fuel projects. Leaving this fossil fuel infrastructure *in-situ* risks creating a "lock in" effect, guaranteeing high levels of gas consumption, obstructing investment in clean energy, and delaying the zero carbon energy transition.

It is crucial that Ireland does not further lock-in its dependence on fossil fuels if we are to meet our climate targets under the Paris Agreement and the Climate Action and Low Carbon Development (Amendment) Bill 2021 - which legally obliges us to achieve a 51% reduction of our 2018 emissions levels by 2030 and net-zero by no later than 2050.

Recommendations

We urge the Department of Environment, Climate and Communications to ensure that:

- The Inch onshore terminal is decommissioned, with full removal and reinstatement to agricultural use as set out in the application.
- The onshore section of the 24" export pipeline is filled with grout as set out in the application.
- Any infrastructure left in situ is not used for future fossil fuel projects. For example, legislation such as the LNG Free Bill can be put in place to prevent the development of Liquefied Natural Gas terminals.

Environmental Impact Assessment Report

As part of Kinsale Energy's application for the decommissioning of certain facilities of the Kinsale Area gas fields, a Comparative Assessment was undertaken to determine the best approach for decommissioning Kinsale Gas Field, Seven Heads Gas Field and Ballycotton Gas Field pipelines and umbilicals. Of the three decommissioning options examined (leave selected infrastructure *in situ*, partially remove selected infrastructure or fully remove selected infrastructure), the assessment determined that the preferred option is to leave the pipelines and umbilicals *in situ.*

We argue that the comparative assessment approach has failed to take into account future impacts on the climate and the environment — in particular those in relation to carbon dioxide and methane emissions — if this infrastructure is once again used for fossil fuels. For example, four Liquefied Natural Gas terminals are proposed for Ireland. Not Here, Not Anywhere has conducted analysis to compare the emissions from the proposed terminals with the estimated emissions from Moneypoint coal plant (assuming maximum capacity). It was found that the total combined CO_2 equivalent (CO_2e) emissions from the proposed LNG terminals would amount to c.80,276,981 tonnes per year. This is approximately 118 times the 2019 emissions from Moneypoint which were 681,047 tonnes (Irish Independent, 2020), granted the plant was not operating at full capacity. Given Moneypoint's maximum estimated emissions (6,890,970 tonnes CO_2) it was found that these proposed LNG terminals would be equivalent to c.11.65 additional Moneypoint coal plants in terms of CO_2e emissions produced every year (NHNA, 2021).

Risk of fossil fuel lock-in by LNG terminals

Kinsale Energy's own Environmental Impact Assessment Report suggests that the facilities being decommissioned could be potentially re-used for hydrocarbon production.

As documented in a submission to the initial consultation on the proposed decommissioning, fossil fuel company Predator Oil and Gas Holdings Ltd are planning to build a LNG terminal located off the coast of Cork and intend to use the Inch onshore terminal and the connected offshore pipeline (the 24" export pipeline that is to be left *in situ*) as an entry point to Gas Networks Ireland.

This is a prime example of how leaving this fossil fuel infrastructure *in situ* risks locking Ireland into dirty energy and threatens our climate commitments. Liquefied Natural Gas is hugely climate-damaging as it leaks methane at every stage of its production (Anderson and Broderick, 2017). On a full life-cycle basis, it is as devastating for the climate as coal or oil (Howarth, 2015). New large scale fossil fuel infrastructure such as LNG terminals are incompatible with a 1.5C world (Smith et al., 2019) and, as Fianna Fáil and Fine Gael stated in 2020, simply "does not make sense". The latest research indicates that we must rapidly phase gas out of the energy mix in Ireland, Europe and globally. In Ireland, gas demand must reduce consistently from 2020 onwards, by at least 11% by 2030 and 37% by 2040 compared to 2020 figures, if we are to achieve 2050 decarbonisation targets (UCC, 2020). To achieve Paris-aligned climate targets McMullin and Price (2019), fossil fuel usage must be reduced at a year-on-year rate of c. 20%, falling effectively to zero within 10-15 years (c. 2030-2035) (McMullin and Price, 2019). The urgent exit from our reliance on fossil fuels would inevitably be slowed down by the establishment of LNG import routes into Ireland.

LNG terminals would be counterproductive for energy security

Multiple factors including Ireland's ability to withstand a disruption in gas supply, reductions in gas demand due to decarbonisation measures and the global oversupply of gas, means that LNG terminals are not required for energy security.In fact, increasing our nation's reliance on LNG fossil fuel energy will further expose us to energy insecurity and price rises, deepening the cost of living crisis. The most secure source of energy for the future is indigenous renewables supported by storage (McMullin et al., 2018). Renewables are already cheaper than fossil fuels (Teplin et al., 2019) and LNG would threaten investment in renewables by flooding the market with dirty energy (Shearer et al, 2014). Fundamentally, the climate risks

of locking Ireland into new large-scale fossil fuel infrastructure far outweigh any potential energy security risks related to gas supply.

A number of studies have examined Ireland's resilience to a disruption in gas supply, taking the impact of Brexit into account. In a 2018 Long Term Resilience study, Gas Networks Ireland (GNI) and EirGrid found that Ireland meets, and for the foreseeable future is expected to meet, the EU's security of supply "supply standard". This standard requires member states to meet the energy needs of protected customers such as homeowners for 30 days in the case of disruption to the largest single piece of infrastructure in average winter conditions (SEAI, 2020:37-40). MAREI analysis for the year 2030 showed that Ireland could sustain an interruption period of up to 10 months without the need for LNG infrastructure (MaREI, 2019).

Historically, the UK has provided most of Ireland's gas supply, and Ervia states that in the UK "there is ample import capacity over and above demand" (Ervia, 2018). Demand for gas in the UK has decreased by a fifth since 2004 and gas-fired electricity generation is expected to drop by 40% by 2025 (Evans, 2019). Several studies have also found existing EU gas infrastructure to be sufficiently capable of meeting future demand, even in the event of extreme supply disruption (ENTSO-G, 2017; Artelys, 2020). Contrary to the common misconception, Ireland is not dependent on Russian gas (Dezem & Khrennikova, 2020), and at the EU level, gas is sourced from a diverse range of countries, including Norway, Russia, Turkey, Central Asia and North Africa. Between 2015 to 2019, the gas demand estimates proposed by ENTSOG, the European body of which Gas Networks Ireland is a member, were between 6% and 17% higher than actual demand (Global Witness, 2020). Latest projections show that LNG demand is forecast to fall 11% by 2030 (Witkop, 2021).

Global and national climate targets mean that LNG terminals and other large fossil fuel infrastructure projects are at a high risk of becoming stranded assets, which must be retired well before the end of their useful life. For example, in 2019 General Electric closed a gas-fired power plant after 10 years, 20 years before the end of its useful life, as it was no longer economically sustainable. Arguments are sometimes made by the industry that LNG Floating and Regasification and Storage Units (FSRUs) are more cost-effective than fixed onshore terminals, but in fact FRSUs have higher operating costs and are more susceptible to extreme weather (Plante et al., 2020).

Any investment in new fossil fuel infrastructure, or providing a market for such infrastructure, will displace investment in clean energy (Shearer et al., 2014). It is also directly contrary to market signals; renewable energy portfolios consistently outperform fossil fuel investments, with a new study showing that renewable power

portfolios generate triple the returns of fossil fuel portfolios and have proven more resilient to the pandemic (IEA and Imperial, 2021).

Conclusion

The Kinsale gas infrastructure is the energy infrastructure of the past, and in the context of Irish legislation and policy and the urgent decarbonization required to keep 1.5C alive, its decommissioning is wholly appropriate. We urge the Department to ensure that any infrastructure left *in situ* is not used for future fossil fuel projects and to pass legislation to ensure this is not the case.

Yours sincerely,
On behalf of Not Here, Not Anywhere
Brian Cuthbert
10 The Lawn, Broadale,
Douglas, Cork

References

Anderson, K and Broderick, J (2017) “Natural Gas and Climate Change”. Manchester:Tyndall Manchester.

Artelys (2020). An updated analysis on gas supply security in the EU energy transition. https://www.artelys.com/wp-content/uploads/2020/01/ArtelysGasSecurityOfSupply-UpdatedAnalysis.pdf

Dezem, V., & Khrennikova, D. (2020, November 28). The Energy Project Trump Can’t Stop Seeks Ways to Finish the Job. *Bloomberg.Com*. https://www.bloomberg.com/news/articles/2020-11-28/the-energy-project-trump-can-t-stop-seeks-ways-to-finish-the-job

ENTSO-G (2017) Union-Wide Security of Supply Simulation Report. Brussels:ENTSO-G. Available: https://www.entsog.eu/sites/default/files/entsog migration/publications/sos/ENTSOG%20Union%20wide%20SoS%20simulation%20repo rt_INV0262-171121.pdf

Ervia (2018). A Look at Irish Gas Market. Dublin: Ervia. Available: https://www.gasnetworks.ie/corporate/company/our-network/irish-gas-market overview/The-Irish-Gas-Market-Overview.pdf (Accessed 6 Mar 2022)

Evans, S. (2019). Analysis: Half of UK’s electricity to be renewable by 2025. *Carbon Brief*. Available : https://www.carbonbrief.org/analysis-half-uks-electricity-to-be renewable-by-2025 (Accessed 6 Mar 2022)

Global Witness. (2020). *Pipe down: Gas companies’ control over billions in EU subsidies*. Global Witness. https:///en/campaigns/oil-gas-and-mining/pipe-down/

Howarth, R. W. (2015). Methane emissions and climatic warming risk from hydraulic fracturing and shale gas development: implications for policy. *Energy and Emission Control Technologies*, *3*, 45-54.

International Energy Agency & Imperial College Business School Centre for Climate Finance & Investment. (2021). *Clean Energy Investing Global Comparison of Investment Returns—Imperial CCFI and IEA.pdf | Powered by Box*. https://imperialcollegelondon.app.box.com/s/73em3ob3h1pu0a0ek3bay2ydiss8x0rr

MaREI. (2019, October). LNG and Energy Security. Retrieved from Oireachtas Committee on Climate Action:

https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_climate_action/submissions/2019/2019-10-10_opening-statement-dr-paul-deane-marei centre_en.pdf

McMullin, B. and Price, P. (2019) Investigating the role of negative emissions technologies in deep decarbonisation pathways for the Irish energy system. IE-NETs Work Package 4 Report. Working Paper, Dublin City University, March 2019. http://tinyurl.com/IENETs-WP4-Report-PDF

McMullin, B., Price, P., Carton, J., Anderson, K. (2018) "Is Natural Gas "Essential for Ireland's Future Energy Security"?" Dublin City University.

NHNA (Not Here Not Anywhere) (2021) Comparison between LNG and Moneypoint https://docs.google.com/document/d/1JTPBqTLrWz2Kk8MLmVeCwwhuJyo2vgzNzhwNWR-PV4/edit#heading=h.yyesw0q4thye (Accessed at 01 Jan 2021)

Plante, L. Browning, J. Aitken, G, Inman, M.Nace, T. (2020). "Gas Bubble 2020 Tracking Global LNG Infrastructure" San Francisco USA, Global Energy Monitor. Available:https://globalenergymonitor.org/wp-content/uploads/2020/07/Gas Bubble_2020_r3.pdf (Accessed 6 Mar 2022)

Shearer, Christine & Bistline, John & Inman, Mason & Davis, Steven. (2014). The effect of natural gas supply on US renewable energy and CO2 emissions. Environmental Research Letters. 9. 094008. 10.1088/1748-9326/9/9/094008. Available : https://ui.adsabs.harvard.edu/abs/2014ERL.....9i4008S/abstract

Smith, C. J., Forster, P. M., Allen, M., Fuglestvedt, J., Millar, R. J., Rogelj, J., & Zickfeld, K. (2019). Current fossil fuel infrastructure does not yet commit us to 1.5 C warming. Nature communications, 10(1), 1-10.

Sustainable Energy Authority of Ireland (SEAI) (2020) Energy Security In Ireland. Dublin:SEAI (page 3) Available : https://www.seai.ie/publications/Energy-Security-in-Ireland-2020-.pdf

Teplin, C., et al. "The Growing Market for Clean Energy Portfolios." Rocky Mountain Institute (RMI). 2019. https://bit.ly/3ayPNE8

UCC 2050 Project (2020) Our 2050 – Opportunities for Ireland in a Low Carbon Economy . Available at:https://public.tableau.com/profile/ucc.2050.project#!/vizhome/Our2050OpportunitiesforIr elandinaLowCarbonEconomy_0/Introduction (Accessed 6 Mar 2022)

Witkop, N. (2021). European LNG demand to fall 11% this decade – Poten. *Montel*. http://www.montelnews.com/en/story/european-lng-demand-to-fall-11-this-decade-- poten/1202453