

## Eamonn Murtagh

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**From:** Grainne McGarty  
**Sent:** 27 September 2011 11:09  
**To:** Eamonn Murtagh  
**Subject:** Submission in connection with Petroleum Safety Framework

Dear Eamonn,

Below please find my submission regarding the Petroleum Safety Framework Implementation Project.

- I feel that the safety framework is fundamentally flawed as it doesn't appear to have considered the risks related to hydraulic fracturing for shale gas.
- It is unclear from the document who is ultimately responsible for petroleum safety, there is a lot of talk about co-operation with other agencies but there is no clear definition of where responsibility lies.
- The mission statement for the document is too narrow. There is a goal that 'Petroleum undertakings achieve safety performance commensurate with the best internationally' given that there seems to be no best practice worldwide this is a very weak goal for fracking.
- There is lack of logical progression between the way the CER designate activities and the way they intend to implement the the permissioning system.
- The document is industry focused and doesn't place enough emphasis on overall risk to the public.

Regards

Grainne Mc Garty  
Manorhamilton  
Co Leitrim