

2 Taobh Tire  
Manorhamilton  
Co. Leitrim  
27/09/11

Dear Mr. Murtagh,

**RE : High Level Design of Petroleum Safety Framework**

I would like to draw your attention to a few concerns

Firstly, the mission statement is too narrow, in that it recognises just the protection of life. I would also like to see that as an overall aim there would be the protection of public health and animal health, along with the preservation of habitat for current and future generations.

Also it is my understanding that there is no adequate regulatory system for Hydraulic fracturing in a European context to meet this new procedure according to the *Impacts of shale gas and shale oil extraction on the Environment and on human health* (Policy Department for the Environment Public health and food safety, European Commission 2011), I would thereby like to see that under the ethos of best practice that the CER would be recommending a moratorium on hydraulic fracturing be put in place until at the very least that recommendations from this report eg about mining etc were put in place and then a review in light of research as to whether a full ban be put in place on the procedure. The European report also suggests a Life Cycle Analysis as a means of proper protocol to be developed and carried out before a development be underway. This assists in proper consultation on local levels with communities. I would also wish that throughout the document that these best practice ideals be understood and brought forward particularly in relation to the Aarhus convention and the importance of people being empowered for decision making of this industry.

Finally, The document focuses on major incidents and does not take into account other forms of accidents that can cause detrimental long term damage eg spillages from produced water in hydraulic fracturing that can cause such damage to health of humans, livestock and habitat. There also needs to be more clarity about accountability of who takes responsibility of what purpose. We have seen too long that when there are too many groups involved it increases the risks of communication flaws while at the same time can mean that the onus of responsibility or culpability can be passed. This body needs to take the lead on this; there can be no room for passing responsibility in something that carries huge risks to personal safety, and long term health and risk to environment.

Thank you for taking the time to log my small submission.

Regards

Ms. Dervilla Keegan