

Druminalass
Ballinaglera
County Leitrim

13th September 2011

Dear Commissioner Blaney,

I formally draw your attention as Commissioner to a serious omission in the public consultation Paper on Petroleum Safety Framework (CER/11/137) issued by you. This Paper was circulated to three Ministers and four agencies, who may well rely on your information as authoritative.

In it, you outlined the Typical Project Lifecycle of a petroleum product for their information (2.1.2) and referred to a "level of understanding" such that the "precautionary principle" is "rarely applied", even though the latter "suggests a strong bias towards avoiding a potential, highly uncertain risk" and is "endorsed by the Heads of Government". (6.3.5). You say it applies "where understanding is minimal and opinions can vary within the scientific community."

Any reference to, or understanding of, 'unconventional oil and gas extraction' (UE) is completely omitted from your Paper, as evidenced in the previous paragraph. Perhaps UE is unknown to you due to the newness of the technology or perhaps otherwise. The different character of UE operations from conventional petroleum production activities is implicitly denied.

This omission/denial could be overlooked, except that you specifically mention three Licensing Options which rely on UE (2.2).

There is a risk that the Ministers/Agencies involved have been severely misled. For example:

- The Radiological Protection Institute was not informed of the risk of "flow-back" liquids contaminated with radioactive elements.
- The Minister of Transport, Tourism and Sport was not informed of the risk of serious damage to his Tourism product from UE
- The Minister for the Environment, Community and Local Government was not alerted to the risk of serious contamination of air and water from UE, to the deterioration of communities due to UE and to possible residual costs to Local Authorities of cleaning up years after UE has finished.
- The Health and Safety Authority was not informed of risks to human health from the chemicals used and produced in UE.
- The Environmental Protection Agency was not informed of well-documented damages to the environment from UE.

All those consulted may respond without being aware of the serious relevant risks in their responsibilities from UE. This may be due partly to your omission of any reference to UE.

It is important that this omission be quickly corrected, especially as you have issued a deadline of the 27th of September for comments. This correction can be done by yourself, or otherwise.

I would be grateful to have your proposal for an urgent resolution, to minimise further embarrassment to the Commission.

Yours faithfully



Druminalass
Ballinaglera
County Leitrim

Mr Garrett Blaney
CER Commissioner
The Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

13th September 2011

Dear Commissioner Blaney,

With reference to the letter attached, I would be grateful if you could respond to its contents as a matter of urgency.

Although formerly a council member of the Electro-Technical Council of Ireland, which was charged with electrical safety in Ireland, I am writing as a private citizen, completely respecting your independence and your activities directed towards the essential interests of the citizens of Ireland.

Yours sincerely,



Liam Breslin B.E.
