

Tina Graham

Subject: CER12017(38) Draft Decision on HLD of PSF consultation - Response from David Taylor
Attachments: cer response.pdf; ATT92276.txt

To: Eamonn Murtagh
Subject: High Level Design of Petroleum Safety Framework

Attached submission
David Taylor

David Taylor

29th March 2012

Sir/Madam

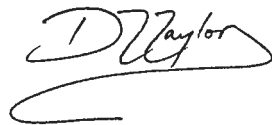
Herewith submission ref CER 12017

The document is highly deficient in terms of scope, analysis, identified risks and prescriptive measures, does it not deal specifically with hydraulic fracturing and associated processes, so cannot provide a satisfactory regulatory framework.

CER must require a health impact assessment as part of any future licensing applications for any and all resource extraction in Ireland. This is an essential requirement before any regulatory framework can be finalised.

All consultation processes must be kept open to the public until all concerns are met.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D Taylor', with a long horizontal flourish underneath.

David Taylor

Question/ Proposal	Do you agree?		Comments
	Yes	No	
1. Do you agree with the proposed scope of the Framework (as set out in Section 2)?		No	
2. Do you agree with the proposed components of the Framework (as set out in Section 3)?		No	
3. Do you agree with the strategic intent of the Framework (as set out in Section 4)?		No	
4. Do you agree with the proposed high level requirements for demonstrating ALARP under the Framework (as set out in Section 5)?		No	
5. Do you agree with the proposed Permissioning System and associated designated petroleum activities under the Framework (as set out in Section 6)?		No	
6. Do you agree with the proposed Compliance Assurance System under the Framework (as set out in Section 7)?		No	
7. Do you agree with the proposed Incident Notification and Investigation under the Framework (as set out in Section 8)?		No	
8. Do you agree with the proposed Agreed Interfaces, Co-operation & Co-ordination with Regulatory Authorities component under the Framework (as set out in Section 9)?		No	
9. Do you agree with the proposed Enforcement System under the Framework (as set out in Section 10)?		No	
10. Do you agree with the proposals for safety reporting and published safety information under the Framework (as set out in Section 11)?		No	
11. Do you agree with proposals for the continuous improvement process under the Framework (as set out in Section 12)?		No	