

Tina Graham

Subject: CER/13/014 - Draft Decision Paper on Petroleum Safety Levy Methodology - Response from Rahima Sayer

Having considered the Draft Decision Paper for the Safety Levy Methodology I am most concerned that the Draft Decision Paper makes no mention of hydraulic fracturing and therefore no provision has been made for the significant costs that will be incurred in regulating this industry.

Considering the vast geographical area that this industry proposes to develop, as indicated in the option leases currently held, this industry will present a major challenge to the CER in regulating its activities. The unconventional nature of shale gas extraction by using this method poses serious risks to the environment and is clearly acknowledged internationally as a major hazard. In order therefore for the CER to fulfill its function in terms of safety regulation and to ensure that the risks posed are as low as is practicable, in accordance with the function invested in it by the 2010 Safety Act, the CER needs to ensure that it will have the necessary resources available to ensure proper compliance and public health and safety is fully protected. This will obviously require the CER to consult widely with outside bodies and employ a considerable number of outside personnel with the necessary expertise to develop and implement a safety framework that is providing an acceptable standard.

The final Levy Order must reflect this requirement and before a final decision can be made on the Levy the CER must consider the implications of the development of this industry in Ireland and ensure in accordance with the terms of the 2010 Safety Act that it has the necessary resources to fulfill its function.

All option holders must be required to pay a sufficient Levy to finance this industry's regulation. I do not want to see a situation in two or three years time where the CER is unable to provide the required level of inspection and regulation of this industry because it has insufficient resources to do so.

I ask that you give consideration to these concerns and that this matter be addressed prior to a final decision on the issue of a Levy Order.

Thank you for your consideration

Yours Sincerely

Rahima Sayer