

Tina Graham

Subject: ALARP consultation
Attachments: ALARP_GR.doc

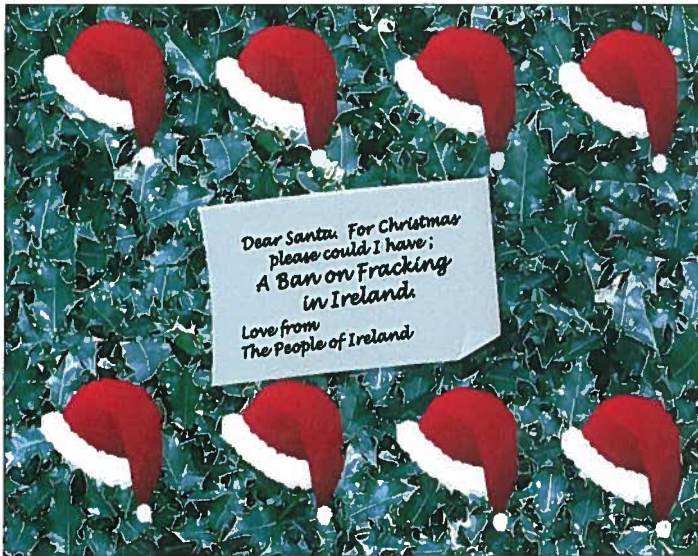
From: Geraldine Ring
Sent: 21 December 2012 17:02
To: Alice Hanly
Subject: ALARP consultation

Dear Sir/Madam,

Please find attached my submission for the ALARP consultation.

Sincerely,
Geraldine Ring

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Submission in response to the public consultation for document: **ALARP Demonstration Guidance Document under the Petroleum Safety Framework**

I would like to express my deep concern that the *ALARP Demonstration Guidance Document under the Petroleum Safety Framework* is not designed to address the serious risks posed by onshore unconventional gas extraction through high volume slickwater horizontal fracturing (HVVF) or fracking for short.

According to a recent comprehensive study carried out for the European Commission entitled Potential Risks for the Environment and Human Health Arising from Hydrocarbons Operations Involving Hydraulic Fracturing in Europe, the activities associated with this industry were rated as high risk in most areas. And as experience from North America and Australia proves, the industry has shown itself incapable of adequately addressing these risks to protect the health of local residents. I firmly believe that such gas extraction should under no circumstances be permitted in Ireland, whose shale basins are too shallow and the groundwater is. A recent report from Germany concluded that fracking should be banned in protected drinking water areas. I understand that the CER is not in a position to ban unconventional gas extraction, but the CER does have the authority to grant or refuse permits on safety grounds. For this authority to retain any credibility, the CER's regulatory system must be designed to realistically address the serious risks posed by unconventional gas extraction.

However, the ALARP guidance discusses "risk tolerability limits" in terms of *fatalities*. Is one to draw the conclusion that only fatality risks are to be controlled by the CER? If so, this is a critical failing of the proposed regulatory system.

In general, I find it appalling that the Irish government or the CER would consider that the very serious health risks posed by shale gas extraction could be in any way acceptable, and in particular that the issue of ALARP would be determined on a cost per fatality basis. How much of Schlumberger's radioactive tracer of Cesium-137, Americum-241, Barilyum would you consider to be ALARP in *your* drinking water? What quantity of VOC emissions would be acceptable for *your* children to breathe?

For the people living in the areas covered by the license options, no level of risk is acceptable when it comes to the very real possibility of significant VOC emissions near their homes, polluted well water, polluted surface water, substantially increased heavy truck traffic on country roads that are not designed for such traffic, and the risk of blowouts/explosions of wells (including drinking water wells, which are now being fitted with methane vents in parts of Pennsylvania to prevent such explosions), pipelines, and compressor stations.

For these reasons, I believe that the precautionary principle should be applied and that the CER should never grant a safety permit for shale gas extraction in Ireland.

Final comment about the appropriateness of regulating onshore shale gas extraction by the ALARP methodology:

A system of safety regulation based on ALARP assumes that the regulatory body has sufficient expertise in the activity being regulated to evaluate whether, in this case, the petroleum undertakings being regulated have adequately identified all the risks posed by their activity and are taking all “reasonably practicable” measures to mitigate these risks.

Given that many CER documents that will form the basis of the future regulation of onshore shale gas extraction in Ireland make no explicit mention of shale gas or unconventional gas, I have no confidence at all that the CER possesses the required expertise and resources to control such a high risk industrial activity. It was only after significant public complaint that the term “hydraulic fracturing” even made it into CER documentation. Such terms as “wastewater”, “flowback water” or even “chemicals” still cannot be found in any of the CER documents currently open for consultation. It is clear that as a regulatory authority you have little understanding of the shale gas industry and therefore are completely incompetent to regulate it. I call for CER not to approve any permits for the shale gas industry to operate in Ireland.