

Appendix I – Consultation Questions

The aim of this Appendix is to allow for a “short-cut” option for respondents to submit their comments to the CER.

Please note respondents are in no way obliged to respond to the questionnaire provided and are welcome to submit comments in their preferred format. However when preparing responses respondents should indicate which section or proposal their text refers to.

No.	Consultation Question	Agree: Yes/No	Comment
1.	Respondents are requested to comment on the above proposed procedure and suggest any changes which respondents believe could improve the procedure.	No	The CER has been advised that it drafted the “high level Safety Framework” in a way that contradicted the specific instructions to it contained in the brief for it – the PEES Act 2010. For this reason NO censoring of safety case information by any group of persons on any pretext can be allowed or accepted. To “improve the procedure” we suggest the CER takes note of the above.
2(a)	Respondents are requested to suggest reasonable timeframes in relation to the following: (a) the length of time within which the petroleum undertaking should submit its request for exclusions to the CER, having received a request for a public version;	N/A	Not applicable if the CER performs its statutory function to prioritise public safety
2(b)	(b) how long should the petroleum undertaking have to make further submissions to the CER if it disagrees with the CER’s refusal or part refusal?	N/A	Not applicable if the CER performs its statutory function

3	Do respondents agree with the proposed scope of the public version of the approved safety case?	N/A	<p>Because at 3.1.1 Noble Dentons report is incorrectly reported in two instances.</p> <p>Because F.O.I is NOT the only or main reference point</p>
4(a)	<p>Respondents are requested to provide comments on the proposed guidance of each of the Exclusion Criteria:</p> <p>(a) Industrial and commercial confidentiality</p>		Industrial and commercial confidentiality is – or should be- insignificant compared to public health and amenity
4(b)	(b) Personal confidentiality		Total “red herring” (-will the person, whose personal confidentiality we are asked to consider- be operating in an unhabited region?)
4(c)	(c) Public security		Another “red herring”
4(d)	(d) National defence		If the CER is concerned to defend Ireland – it will not assist to enable the implimentation of an industrial process that will exacerbate climate change

5.	Do respondents agree with the CER's proposal to recommend a standard, nominal fee that petroleum undertakings should charge to members of public who request a copy of the approved safety case?		<p style="text-align: center;">Absolutly not!!!</p> <p style="text-align: center;">To be charged a fee for a document that may or may not tell us the extent to which we, the public, may be put at risk???</p> <p style="text-align: center;">Where is the CER coming from??</p>
6.	Respondents are requested to suggest what fee would be reasonable, with associated rationale.		<p style="text-align: center;">This defies belief. For a publicly funded public oriented organisation being complicit in this procedure</p>

The CER is bound by Statute to draft and implement Safety Regulations for Petroleum activities in a way that cannot override precautionary principles, burden of proof principles, Aarhus, International and European law.

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Directot, for and on behalf of Uisce Domhain LTD.