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**Safety before LNG**

*Protecting the Shannon Estuary and its people*

30th May 2022

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**Submission**

**to**

**The United Nations Human Rights Committee  
for the List of Issues Prior to Reporting**

**in respect of**

**IRELAND**

**for**

**the International Covenant on Civil and  
Political Rights (ICCPR),**

**135th session**

**(27th June 2022 - 27th July 2022)**

**by**

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## Table of Contents

1. Introduction .....	2
2. Background .....	3
2.1 The proposed Shannon LNG fracked gas import terminal in Ireland .....	3
3. Proposed List of Issues .....	5
3.1. Accounting for the full lifecycle, non-territorial emissions and impacts of Ireland's Energy choices .....	5
3.2 Fracked Gas War Profiteering and victimisation of MEPs Clare Daly and Mick Wallace.....	7
3.3 Attorney General legal opinion on a legislative Fracked Gas Import Ban withheld from public scrutiny.....	9
3.4 Deliberate erosion of Public Participation in the decision-making process in the Strategic Infrastructure Act 2006 and the Housing and Development Bill 2019.....	12

# 1. Introduction

Safety Before LNG is a local activist group campaigning against the construction of the proposed Shannon LNG import terminal in Ireland by U.S.-based New Fortress Energy in order to prevent the importation of US fracked gas, on climate-mitigation, public-health, environmental-protection and human-rights grounds.

We have prepared this submission for the purpose of informing the United Nations Human Rights Committee's (the Committee) List of Issues Prior to Reporting (LOIPR) in respect of Ireland for the 135th session of the International Covenant on Civil and Political Rights (CCPR).

In his essay on "[The Power of the Powerless](#)"<sup>i</sup>, Václav Havel wrote,

*"If the main pillar of the system is living a lie, then it is not surprising that the fundamental threat to it is living the truth. This is why it must be suppressed more severely than anything else."*

We are concerned that there is a sustained and concerted political and legislative effort in Ireland to suppress the truth by circumventing Ireland's obligation to ensure that human rights abuses consequential to Irish energy policy and energy decisions are not offshored and hidden away outside of Irish territory by companies operating in Ireland and by circumventing Ireland's obligation to ensure that there is access to justice in Irish courts for violations of international human rights throughout the full lifecycle of the operations of energy companies operating or based in Ireland irrespective of where in the world those violations take place. We are also concerned that this effort, if successful, will have a negative domino effect on human rights in other areas of political and civil life in Ireland, accentuating the urgency with which this issue should be dealt with.

This report focuses on the following areas of concern where we feel this obligation is being undermined at a political level in Ireland.

1. Accounting for the full lifecycle, non-territorial emissions and impacts of Ireland's Energy choices
2. Fracked Gas War Profiteering and victimisation of MEPs Clare Daly and Mick Wallace

3. Attorney General legal opinion on a legislative Fracked Gas Import Ban withheld from public scrutiny
4. Deliberate erosion of Public Participation in the decision-making process in the Strategic Infrastructure Act 200 and the Housing and Development Bill 2019.

Recommended questions are highlighted in bold at the end of each section.

## 2. Background

### 2.1 The proposed Shannon LNG fracked gas import terminal in Ireland

There are no LNG terminals in Ireland.

U.S.-based New Fortress Energy is attempting to get permission to build its only LNG import terminal in Europe in Ireland. New Fortress Energy's Irish subsidiary - Shannon LNG - obtained a ten-year planning permission for an onshore liquefied natural gas (LNG) Import Terminal in [2008](#)<sup>ii</sup> at Tarbert, County Kerry on the Shannon Estuary on the south-west coast of Ireland. The [controversial](#)<sup>iii</sup> terminal was never built. In July 2018, the company was granted an [extension](#)<sup>iv</sup> of planning permission by An Bord Pleanála - the national planning authority of Ireland. However, the Irish High Court [ruled](#)<sup>v</sup> in November 2020 that An Bord Pleanála had illegally granted the extension of planning and the High Court went on to quash all development consent for the proposed Shannon LNG US fracked gas import terminal on the Shannon Estuary.

This ruling came in spite of, as claimed by an Irish activist to the European commission TEN-E Energy meeting in Brussels on May 7th 2019, the accusation that New Fortress Energy had offered what was later referred to in the Irish parliament<sup>vi</sup> as a "[bribe](#)" to the Environmental NGO '*Friends of the Irish Environment*' of one million Euros to pull its case against the planning permission for Shannon LNG's fracked gas import terminal which the European Commission had put on its special 'Projects of Common Interest' list. But the [Friends of the Irish Environment](#), it was claimed, apparently refused the money and won its case<sup>vii</sup>. This would be unacceptable behaviour if true and would have represented an attempt to purchase an inalienable right to build a U.S. fracked gas import terminal on the Shannon

Estuary without the public knowing about it. If New Fortress Energy had indeed attempted to buy off the "*last man standing*" with a €1 million offer then that would not be acceptable to us. It would be unacceptable to us that such an important environmental decision could possibly have been determined in the margins of the High Court; behind closed doors; in private; without any meaningful participation by the public, representing a denial of access to justice by the public. This has already brought the planning consent for this project into disrepute in Ireland in our opinion.

Ireland banned fracking in 2017 on public health and environmental grounds and has been a leading light for other nations in the global anti-fracking campaign.

On May 18th, 2021, the Irish Government [published](#)<sup>viii</sup> a policy statement on the importation of fracked gas. The [policy statement](#)<sup>ix</sup> declares that "*Ireland imports much of its natural gas via the two interconnector pipelines from Moffat in Scotland, which provide the majority of natural gas currently used in Ireland. Given the level of fracked gas in the imports from Scotland is considered very low, the highest risk of fracked gas being imported into Ireland on a large-scale would be via liquefied natural gas (LNG) terminals, if any were to be constructed*". The policy statement concludes that "*pending the outcome of the [review](#) of the security of energy supply of Ireland's electricity and natural gas systems, it would not be appropriate for the development of any LNG terminals in Ireland to be permitted or proceeded with*".

Just over three months later, however, on August 27th, 2021, without waiting for the energy review to be completed, New Fortress Energy and Shannon LNG insisted on [reapplying](#)<sup>x</sup> to An Bord Pleanála - the Irish Planning Authority - for an offshore LNG import terminal.

Regarding the ongoing security of energy supply review, the Department for the Environment [ordered](#) that "*any options identified must be in keeping with the commitments in the Programme for Government. This includes any policy statement that is developed to establish the approach to the Government's stated commitment not to support the importation of fracked gas*". The latest government [Framework Document](#) on national energy security, published on April 13th, 2022 states that this review is due for publication between July and September 2022.

An Bord Pleanála, has postponed a decision on the new planning application for the proposed Shannon LNG terminal until September 2022. However, this proposed project, more than any other in Ireland we feel, has the capacity, due to the sheer wealth, influence and power of the fossil-fuel lobby, to undermine the democratic work of government in Ireland and to wind back the hard-won civil, political and human rights advances of over 100 years.

## 3. Proposed List of Issues

### 3.1. Accounting for the full lifecycle, non-territorial emissions and impacts of Ireland's Energy choices

The latest peer-reviewed scientific studies, found in 2019 that [one third of the total increased methane emissions from all sources globally over the previous decade was coming from US fracked gas \(shale gas\)](#)<sup>xi</sup> - the world's largest single super emitter of Methane. Scientists have also found that methane emissions are accelerating global warming because, as the latest Intergovernmental Panel on Climate Change (IPCC) reports from 2021 have indicated, methane has a Global Warming Potential (GWP) [108 times](#)<sup>xii</sup> greater than carbon dioxide when considering its impact over a 20-year timeframe..

Addressing these non-territorial emissions, scientists informed the Irish Parliamentary Committee on Climate Action in October 2019 that importing US fracked gas into Ireland has a carbon-equivalent footprint over a 20-year period of at least [44% greater than importing coal](#)<sup>xiii</sup> over the full life-cycle. Scientists have also shown, however, that, unlike the case for carbon dioxide, the Climate System responds quickly to a reduction in methane emissions which, along with CO2 reduction measures, could provide the opportunity to immediately slow the rate of global warming by around [half a degree celsius](#)<sup>xiv</sup>.

The "[International Human Rights Impacts of Fracking Report](#)"<sup>xv</sup> produced by the Postgraduate law students at the National University of Ireland Galway (NUIG) Irish Centre for Human Rights in May 2021 notes that a significant body of scientific evidence now exists to demonstrate that fracking is dangerous to public health,

water, air, climate stability, farming, property, and economic vitality in ways that **cannot be mitigated through regulation**. This is a key conclusion of the 7<sup>th</sup> edition of the [Compendium](#)<sup>xvi</sup> of *Scientific, Medical and Media Findings Demonstrating Risks and Harms of Fracking* produced by the Concerned Health Professionals of New York and Physicians for Social Responsibility. The most recent *Compendium of Scientific, Medical and Media Findings Demonstrating Risks and Harms of Fracking* also finds:

*“The evidence clearly demonstrates that the processes of fracking contribute substantially to anthropogenic harm, including climate change and global warming, and involve massive violations of a range of substantive and procedural human rights and the rights of nature.”*

The 56-page report analyses the existing scientific evidence alongside case law and other legal standards emanating from the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the Convention on the Rights of the Child, the Convention on the Elimination of All Forms of Discrimination against Women, the Convention on the Rights of Persons with Disabilities, the Convention on the Elimination of Racial Discrimination and the European Convention on Human Rights.

The report concludes that fracking is incompatible with states’ legal obligations to protect, respect and fulfil basic human rights including:

- the right to life,
- the right to health,
- the right to water,
- the right to food,
- the right to housing,
- the right to access to information,
- the right to public participation,
- the right to a safe, clean, and healthy environment, and
- the rights of marginalized persons & communities.

In October 2021, the UN's main human rights body also overwhelmingly voted to recognise the [right to a safe, clean, healthy and sustainable environment as a human right](#)<sup>xvii</sup>, and to appoint an expert to monitor human rights in the context of the climate emergency.

We ask that the Committee takes on board the issues raised in this report which clearly undermine any justification for the expansion of the fracking industry via a massive increase in the trade of liquefied natural gas on a global scale. The global expansion of LNG is directly facilitating the expansion of fracking.

**Recommended Question:**

- What is Ireland doing to ensure that full lifecycle, non-territorial emissions and human rights impacts of the assessment of its energy choices are taken on board?

### **3.2 Fracked Gas War Profiteering and victimisation of MEPs Clare Daly and Mick Wallace**

We are strongly of the opinion that the war in Ukraine cannot be used as a fracked gas war-profiteering excuse to import fracked gas from the U.S. to Europe. Replacing Russian gas imports into Europe with U.S. fracked gas is highly questionable on human rights, public health, climate and environmental grounds. Ireland's supply of gas, incidentally, does not come from Russia but from the North Sea via the Moffat interconnectors in Scotland owned by Gas Networks Ireland.



New Fortress Energy, which is currently targeting Ireland as its sole European destination for U.S. Fracked gas at its proposed Shannon LNG terminal, cannot therefore claim to be reducing Ireland's dependence on Russian gas.

On March 1st, 2022, two Irish Members of the European Parliament (MEPs) - Clare Daly and Mick Wallace - were amongst the 13 MEPS who voted against a resolution in the European Parliament entitled "[Russian Aggression against Ukraine](#)"<sup>xviii</sup>, while 26 other MEPs abstained and 637 voted for the resolution. While they both condemned the Russian invasion of Ukraine they did not support the motion on, *inter alia*, the grounds of neutrality (Ireland's official position we note) and because the motion also called for "expanding liquefied natural gas terminals".

Since this highly principled position both MEPs have been subjected to sustained abuse and criticism both [iinside](#)<sup>xix</sup> and outside the Irish parliament. We believe that this victimisation runs counter to the ICCPR.

Article 20 of the ICCPR states clearly that "*Any propaganda for war shall be prohibited by law*".

Article 2 states that "*Each State Party to the present Covenant undertakes to respect and to ensure to all individuals within its territory and subject to its jurisdiction the rights recognized in the present Covenant, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status*".

Article 17 states that "No one shall be subjected to arbitrary or unlawful interference with his privacy, family, home or correspondence, nor to unlawful attacks on his honour and reputation".

Article 19 states that " Everyone shall have the right to hold opinions without interference."

### Recommended Questions:

- What is Ireland doing to ensure that the war in Ukraine is not used as an overriding excuse to import U.S. fracked gas into Ireland?
- Will Ireland, a neutral country, confirm that neutrality and anti-war politicians and climate activists, including MEPs Clare Daly and Mick Wallace, are not victimised for their political opinions on neutrality and LNG import terminals?

### **3.3 Attorney General legal opinion on a legislative Fracked Gas Import Ban withheld from public scrutiny**

[Legal opinion](#)<sup>xx</sup> was submitted in November 2020 by researchers at the highly-respected Human Rights Law Clinic at the Irish Centre for Human Rights of NUI Galway to the Joint Committee on Climate Action tasked with pre-legislative scrutiny of Ireland's new Climate Bill.

It confirmed that the world's first fracked gas import ban in the Climate Bill would be compatible with legal EU, European Free Trade Association (EFTA) and World Trade Organization (WTO) trade rules.

Ireland already had a ban on fracking and the Irish Government had stated consistently since the coalition was formed in June of that year that it no longer supported the importation of fracked gas.

A fracked gas import ban would have demonstrated a willingness to tackle the world's largest single super emitter of methane and one of the worst contributors to climate change. It would also have demonstrated solidarity and empathy with communities in Pennsylvania, Texas, Northern Ireland and elsewhere affected by, or threatened with, the scourge of fracking. Such a ban would have set Ireland on course to become a Global Climate Leader. Ireland would have been the first country in the world to ban the importation of fracked gas having already implemented a legislative ban on fracking in [2017](#).<sup>xxi</sup> The global trade in LNG was being fuelled by the boom in climate-destructive fracking and both were inextricably linked.

A ban on fracked gas imports would also have sent a strong market signal to the fracking industry that Ireland would not be a market for fracked gas from Northern Ireland and would undermine the business case for fracking in Northern Ireland about which the Executive was expected to make a decision on within months.

However, no such ban was implemented in legislation. The Irish Government did, however, still go on to publish a historic world-first [policy statement](#)<sup>xxii</sup> against fracked gas imports on May 18th, 2021 in which it stated:

*"The placing of a legal prohibition on the importation of fracked gas in national legislation has been considered and legal advice has been provided by the Attorney General. In the context of European Union Treaties and the laws governing the internal energy market, it is considered that a legal ban on the importation of fracked gas could not be put in place at this time."*

In publishing the policy statement, the government [explained](#)<sup>xxiii</sup>:

*"Following detailed examination by the Office of the Attorney General, it has not proved possible to provide a legal basis for Ireland to legislate domestically for a ban on the import of fracked gas. The Attorney General has determined that:*

*It is not possible for Ireland under the European Treaties or EU Directive 2009/73/EC concerning common rules for the internal market in natural gas:*

- *to legislate for a ban on the import of fracked gas*
- *to ban the import into Ireland of fracked gas*
- *to prevent the processing of fracked gas in the State*

*In light of the legal determination, the actions set out in the Policy Statement below are considered to be the most realistic options available to ensure the Government fully delivers on the implementation of the Programme for Government".*

This environmental legal opinion has never been published for public scrutiny. We think that this is highly unfair and contrary to our human rights because we had

substantive legal advice to the contrary and because it prevents public participation in environmental decision making in Ireland and is giving the Attorney General, who is supposed to be just a public servant advising government, an effective veto over environmental decision making in a non-transparent manner in Ireland.

**Recommended Question:**

- **Will Ireland agree to publish the full Attorney General Opinion on why a legal ban on the importation of fracked gas could not be put in place in Ireland?**

### **3.4 Deliberate erosion of Public Participation in the decision-making process in the Strategic Infrastructure Act 2006 and the Housing and Development Bill 2019**

In December 2019 the Irish Government launched a proposed bill (the [Housing and Planning and Development Bill 2019](#))<sup>xxiv</sup> with the express intention of making it even more difficult for Irish NGOs to take a legal challenge of a planning decision. One example is that the [Planning Bill 2019](#)<sup>xxv</sup> intends to make it obligatory that any NGO taking a challenge must have already been in existence for more than 3 years, have at least 100 affiliated members, be liable to at least €5,000 in costs if the challenge is taken by an individual and €10,000 if taken by an NGO, be liable to this amount being changed by the Judge, all with the expressed intention of preventing the *"taking of greater numbers of judicial reviews in the planning area in Ireland than might otherwise be the case"*.

Our reaction on the changes proposed by this Planning and Development Bill is that it represents a breach of EU law and is a breach of Human Rights. The motivation in making it more difficult for public participation in the Planning Process has been signalled by politicians over the last couple of years fuelled by heavy lobbying by vested interests such as the fossil fuel sector and in our opinion this proposed bill is the result of that comprador motivation and lobbying.

Our experience with the [Strategic Infrastructure Act 2006](#)<sup>xxvi</sup>, where An Bord Pleanála is the planning authority of first instance was already a step in preventing public participation in projects such as the fracked gas import project by Shannon LNG, where the only means to appeal the administrative decision on environmental grounds is to go to the High Court. Up to that point, An Bord Pleanála was a referral body. Now, when the hurdles to take a challenge in the High Court, even on environmental grounds alone, are already insurmountable, the Irish government wants to make it even more difficult for people to participate in the planning process.

#### **The Last Man Standing and €1 million**

If the [decision](#)<sup>xxvii</sup> by An Bord Pleanála to extend planning duration for the proposed fracked gas import terminal proposed by 'New Fortress Energy' had not been

allowed to have been challenged in the [High Court](#)<sup>xxviii</sup>, then the mistakes made by An Bord Pleanála would have gone away unchallenged. And the errors made by An Bord Pleanála on the Shannon LNG application were not negligible ones. They were serious, and they were many. The challenge in court was so serious that when news broke that the eNGO challenging the planning permission (The Friends Of the Irish Environment) was offered €1million Euros to withdraw its challenge (which One T.D. described in the Dáil with the words “essentially offered to bribe the organisation with €1 million to drop the case”<sup>xxix</sup> ) it laid bare to many a dirty practice of unethically removing the last man standing.

### **The €1 million Not a once off – The Corrib Case and ELIG**

The infamous and disgraceful Corrib settlement in 2011 was another example of the last man standing but this time the last man standing left the pitch leaving a community abandoned [without a court decision](#)<sup>xxx</sup>. The ‘Environmental Law Implementation Group’ (ELIG) was “established as a consequence of a settlement made between the Irish Government and An Taisce following a case relating to the Corrib gas projects” and ELIG describes their [role](#)<sup>xxxi</sup> as follows:

*"The Environmental Law Implementation Group (ELIG) was established as a consequence of a settlement made between the Irish Government and An Taisce following a case relating to the Corrib gas projects. The overarching objective of the ELIG process is to assist in the protection and enhancement of Ireland's environment by seeking to improve the transposition, implementation, and enforcement of Environmental Law. To enable this to happen, the ELIG processes are designed to facilitate greater and more effective communication between environmental NGOs as represented by the Environmental Pillar and An Taisce (collectively EPAT), and the Government and its Departments and agencies. ELIG is designed to act as the primary vehicle through which communication and problem solving, in relation to the issues above, should take place. Issues of concern or non-compliance with any element of environmental law identified by An Taisce or the other members of the Environmental Pillar should, where appropriate, first be raised with the identified government key contact point for the issue through the ELIG processes. To do this a mechanism exists whereby two nominees of the*

*Department of the Environment work together with one nominee from each of the Environmental Pillar and An Taisce to form the Bureau of ELIG. The ELIG Bureau acts as an intermediary or broker between the EPAT on the one hand, and the Government and its Departments and agencies on the other. It does this in order to enhance and improve upon the case-by-case, or issue-by-issue, engagement on environmental law matters. So for example, if the EPAT members see a particular issue in relation to say aquaculture, then the matter is raised at the Bureau. The DCCA officials then contact the relevant officials in DAFM and try to resolve the issues raised and usually arrange a meeting between the parties. As this process is consequent on a decision of the Courts, the DAFM and other relevant government bodies are required to respond and participate. This is a very powerful tool for the EPAT members To enable the EPAT members to act effectively, and so in part to fulfil its responsibilities, the government agreed to provide the resources to allow for the employment of an NGO ELIG Facilitator, and to enable EPAT members to engage effectively. The role of the Facilitator is to provide a driving focus for the EPAT ELIG initiative and to facilitate EPAT members to enable them to engage in a productive and creative manner with ELIG".*

Our interpretation of the result of this last man standing folding in the Corrib case is that it removed even further public participation in the planning process for the general public and has instead given us an even stronger concentration of power and influence in the hands of highly-funded quangos such as ELIG.

We fear that the real motivation behind this proposed bill is an attempt to concentrate the environmental participation process in the hands of a smaller and smaller group of highly powerful people with no concern for the general public.

We are also deeply disturbed that the concerns at attempts in Ireland to thwart public participation in the planning process which were already highlighted by UN Special Rapporteur on Extreme Poverty [Philip Alston](#)<sup>xxxii</sup> in Dublin on 19th December 2019 have been completely ignored by the Irish Government with the publication of this Bill.

## **Not-Prohibitively Expensive Challenges to Administrative Environmental Decisions**

Under Article 19 TEU (Judicial Protection), Article 4 TEU (Sincere Co-operation), Article 9 Aarhus Convention (Access to Justice) and Article 6 OF THE ECHR Human Rights), members of the public should have equality of arms and timely legal certainty of all costs established at the outset of any challenge to an administrative environmental decision in Ireland. Our not-prohibitively-expensive Aarhus rights need to be confirmed and guaranteed before a challenge is taken and should not be open for modification at the whim of a judge.

There is no system in place in Ireland for the application of a Not-Prohibitively Expensive Access to Justice in Environmental Matters that covers the prohibitively-expensive costs, even from the litigant's own legal team.

The Irish Legal Aid Board *cannot legally assist any person whose disposable income is more than €18,000" because Regulation 13(3) of the Civil Legal Aid Regulations 1996-2013 specifies that "an applicant whose disposable income exceeds [€18,000 per annum](#) shall not be eligible to obtain legal aid or advice<sup>xxxiii</sup>.*

It is commonly known in the adversarial legal system that exists in Ireland (as opposed to the Inquisitorial one in other countries of mainland Europe) that the cost of a legal challenge from even one's own legal team alone in the Irish High Court would run in to the thousands of Euros and without active funding from the Legal Aid Board most people will feel the chilling effect and not be able to risk their life savings and more on legal challenges. EU directives outlaw challenges such as environmental challenges from being prohibitively expensive. And even the EU Charter of Fundamental Rights Article 47 clearly states that "*Legal aid shall be made available to those who lack sufficient resources in so far as such aid is necessary to ensure effective access to justice*".



### Recommended Question:

- How will Ireland's proposed 'Housing and Planning and Development Bill, 2019' allow legal challenges to administrative environmental decisions in a way that is not prohibitively expensive?
- Would Ireland consider revoking the Strategic Infrastructure Act 2006 that would allow An Bord Pleanála to become, once again, a referral body for planning appeals from decisions by local planning authorities?

<sup>i</sup> <https://hac.bard.edu/amor-mundi/the-power-of-the-powerless-vaclav-havel-2011-12-23>

<sup>ii</sup> <https://archive.pleanala.ie/en-ie/case/Pa0002>

<sup>iii</sup> <http://safetybeforelng.ie/news.htm>

<sup>iv</sup> <https://www.pleanala.ie/en-ie/case/pm0014>

<sup>v</sup>

<http://safetybeforelng.ie/pressreleases/pressrelease20201109ShannonLNGFrackedGasImportTerminallosesPlanningPermission.html>

<sup>vi</sup> <https://www.oireachtas.ie/en/debates/debate/dail/2019-05-21/7/> Planning and Development (Climate Measures) (Amendment) Bill 2019: First Stage Dáil Éireann debate - Tuesday, 21 May 2019

<sup>vii</sup> <https://www.thetimes.co.uk/edition/ireland/friends-of-the-irish-environment-got-1m-offer-to-end-lawsuit-over-kerry-gas-terminal-t3hvfkhs2>

<sup>viii</sup> <https://www.gov.ie/en/press-release/dbe48-policy-statement-on-the-importation-of-fracked-gas-published/>

<sup>ix</sup> <https://www.gov.ie/en/publication/f3774-policy-statement-on-the-importation-of-fracked-gas/>

<sup>x</sup> <https://www.pleanala.ie/en-ie/case/311233>

<sup>xi</sup> Howarth, R. W.: Ideas and perspectives: is shale gas a major driver of recent increase in global atmospheric methane?, *Biogeosciences*, 16, 3033–3046, <https://doi.org/10.5194/bg-16-3033-2019>, 2019.

<sup>xii</sup> [https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC\\_AR6\\_WGI\\_Full\\_Report.pdf](https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf) (table 7.15 page 139)

<sup>xiii</sup> <http://www.safetybeforelng.ie/pressreleases/pressrelease20191014-ScienceAgainstFrackedGasImportsBeatsRaceToTheBottom.html>

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xiv <https://www.youtube.com/watch?v=qR5TqEyQLJ4> and Shindell et al., “Simultaneously Mitigating Near-Term Climate Change and Improving Human Health and Food Security”, Science, 13 Jan 2012, Vol. 335, Issue 6065, pp. 183-189, Figure 1.DOI: 10.1126/science.1210026

xv [https://drive.google.com/file/d/1znehsWJuEfh\\_Xu1zqCQV6P0KZiNt7n-R/view](https://drive.google.com/file/d/1znehsWJuEfh_Xu1zqCQV6P0KZiNt7n-R/view) - see

#### Appendix 1

xvi <https://www.psr.org/blog/resource/fracking-compendium/>

xvii <https://www.theguardian.com/world/2021/oct/08/clean-environment-is-a-human-right-un-council-agrees>

xviii [https://www.europarl.europa.eu/doceo/document/TA-9-2022-0052\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-9-2022-0052_EN.html)

xix <https://www.kildarestreet.com/search/?s=%22Clare+Daly%22>

xx

[http://safetybeforeing.ie/images/ICHR%20and%20ors%20Submission%20to%20JCCA%20A%20Ban%20on%20Importing%20Fracked%20Gas%2011-11-2020\\_FINAL.pdf](http://safetybeforeing.ie/images/ICHR%20and%20ors%20Submission%20to%20JCCA%20A%20Ban%20on%20Importing%20Fracked%20Gas%2011-11-2020_FINAL.pdf)

xxi <http://www.irishstatutebook.ie/eli/2017/act/15/section/1/enacted/en/html>

xxii <https://assets.gov.ie/135271/3226a65b-c49c-458e-9ab9-83b2d1196af2.pdf>

xxiii <https://www.gov.ie/en/publication/f3774-policy-statement-on-the-importation-of-fracked-gas/>

xxiv <https://www.gov.ie/en/consultation/c20fbc-public-consultation-on-general-scheme-of-the-housing-and-planning-an/>

xxv <https://assets.gov.ie/109116/6ddb59e7-e367-4913-809a-4e3f52d6f0e7.pdf>

xxvi <https://www.irishstatutebook.ie/eli/2006/act/27/enacted/en/html>

xxvii <https://www.pleanala.ie/en-ie/case/pm0014>

xxviii <http://courts.ie/Judgments.nsf/0/A6D3C5CE0FD82116802583A200392CCD>

xxix <https://www.oireachtas.ie/en/debates/debate/dail/2019-05-21/7/>

xxx <https://www.antaisce.org/articles/corrib-settlement-means-ensure-better-environmental-law-taisce>

xxxi <https://ien.ie/environmental-law-implementation-group/>

xxxii <https://www.youtube.com/watch?v=RaDJrGwD9x8>

xxxiii <https://www.legalaidboard.ie/en/policy-and-guidance/legislation/civil-legal-aid-regulations-1996-2017-consolidated-.doc>