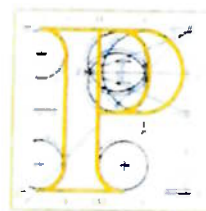


Our Case Number: ABP-319566-24



**An
Bord
Pleanála**

**Gluaiseacht for Global Justice
7 Carrigmahon Place
Monkstown
Co. Cork**

Date: 19 June 2024

**Re: The proposed development will comprise of a 600MW Powerplant, 120MW Battery Energy Storage System, Above Ground Installation and associated ancillary works.
Located within the townlands Kilcolgan Lower and Ralappane between Tarbert and Ballylongford Co.Kerry. (www.steppowerplant.com)**

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

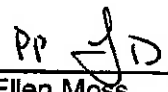
The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



**Ellen Moss
Executive Officer
Direct Line: 01-8737285**

PA04

Tel	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Objection to Proposed Shannon LNG's Gas Powerplant Planning Application by Gluaiseacht

Objection by: Gluaiseacht for Global Justice

Applicant: **Shannon LNG Limited**

Bord Pleanála Case reference: PA08.319566

We refer to the above planning application and wish to make the following objection in relation to the proposed development.

1. Introduction

No to Shannon LNG

No to fracked gas being imported to Ireland

No to ignoring the “Code red for humanity” warning of the IPCC

The applicant is seeking to build a development which it estimates during operation will emit 21,742,544 tCO₂e into the atmosphere, and this figure excludes well-to-tank emissions along with emissions from the developers proposed data centre campus and fracked gas import terminal. Even so, the applicant states *“The GHG assessment has considered the proposed development to have a major adverse residual effect and is therefore considered significant.”* Because we believe in climate science and don't want to bring about humanity's destruction, we believe that An Bord Pleanála should reject this application.

At a time when warnings on the climate emergency could not be any more stark and when everyone should be looking at minimising use of carbon based energy systems, this overall project seeks to get Ireland hooked on US fracked gas and to increase our dependence on fossil fuels.

The applicant has admitted in their application that they have split their overall project into different pieces saying:

“An overall masterplan for the Shannon Technology and Energy Park has been prepared and is submitted for information with the planning application. The Masterplan for the Shannon Technology and Energy Park (STEP) will integrate the proposed development and

a (future) Strategic Gas Reserve Facility and a (future) Data Centre Campus. The Strategic Gas Reserve Facility and Data Centre Campus is not included in this application and will therefore be subject to a separate planning application."

New Fortress Energy is a US fracked gas company. We believe this application has more to do with opening up a way of bringing fracked gas into the Irish gas grid than with generating electricity. There has been an 189% increase in the amount of US LNG being imported into Europe between 2021 & 2023. Furthermore 88% of US gas is from fracking.¹

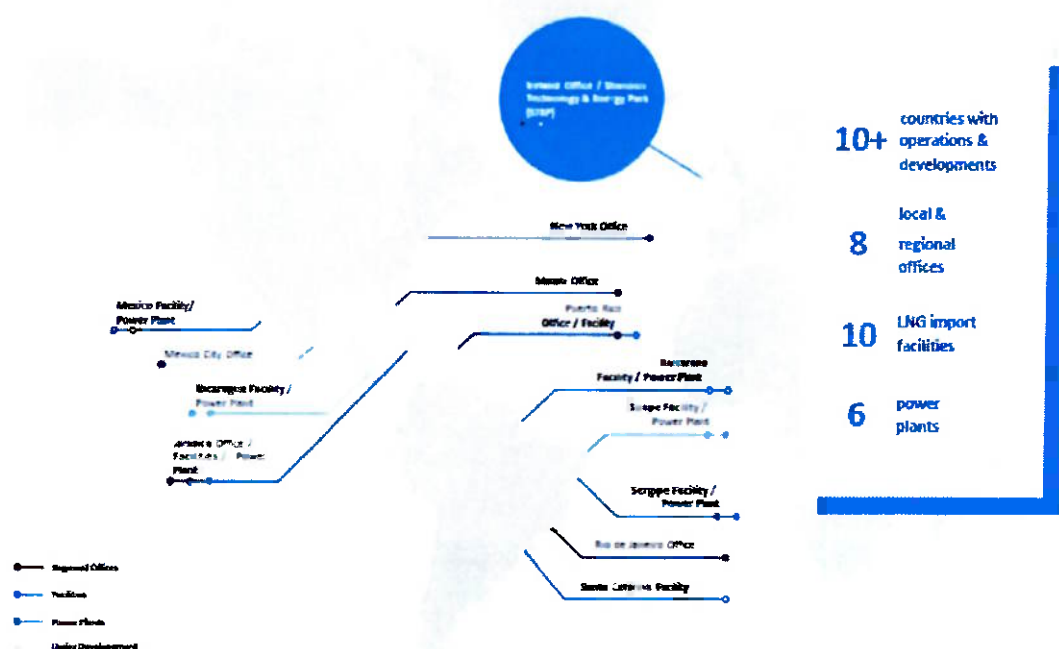
It would be absolute lunacy and climate denial of the first order for An Bord Pleanála to grant permission to the project, given the warning of "code red for humanity" that the 2021 IPCC report has given us.

2. Shannon LNG - a Fracked Gas Import Terminal

Would STEP be using Fracked Gas if fully developed. The short answer is an unequivocal yes.

The developers have misled ABP and the public in their current application as to the extent that their operations aren't based on fracked gas. Take for instance the figure from A1.1 below which purportedly lists New Fortress Energy's "Operations & Developments"

Our Operations & Developments



¹<https://www.foodandwatereurope.org/factsheet/lng-liquefied-fracked-gas-unveiling-the-toxic-truth-behind-europes-lng-obsession/>

Figure 1: New Fortress Energy Operations & Development but with Liquefaction assets excluded

In the application New Fortress Energy have deliberately excluded their operations in the US, from which they source their gas. This is because if New Fortress Energy included their Liquefaction Assets in the image it would make clear how their whole operation is dependent on fracked US gas.

Some of the facilities they have excluded include:

<https://www.newfortressenergy.com/operations/miami-florida-LNG-liquefier>

https://www.gem.wiki/New_Fortress_Wyalusing_LNG_Terminal

Contrast the image to a recent NFE SEC filing: <https://ir.newfortressenergy.com/node/6301/html>

In it New Fortress Energy state

"Liquefaction – Our approach is to enter into long-term, largely fixed-price contracts for feedgas, then liquefy that gas at or proximate to its site of extraction, minimizing transport and pipeline costs for the feedgas producers. We are currently developing a liquefier on land we have purchased in the Marcellus area of Pennsylvania, which is expected to have the capacity to produce approximately 3 to 4 million gallons of LNG (which is the equivalent of 250,000 to 350,000 MMBtu) per day, and intend to develop five or more additional liquefiers over the next five years.

Logistics – We expect to own or control the logistics assets necessary to deliver LNG to our customers through our "logistics pipeline." Tanker trucks will transport LNG from our liquefier to a port on the Delaware River, at which point LNG will be transloaded directly to large marine vessels."

"On March 2, 2018, the Company entered into a gas purchase agreement with a major Marcellus Shale producer to supply approximately 160 mcf/d or equivalent of approximately 2,000,000 LNG gallons per day to the Company effective upon fulfillment of certain conditions precedent."

In the SEC filing, under the title *"Our Liquefaction Assets"*, New Fortress Energy also state

"We intend to supply all existing and future customers with LNG produced primarily at our own liquefaction facilities."

These are the only two liquefaction facilities identified under the *"Our Liquefaction Assets"*

Why have the applicants excluded these operations from the "Our Operations & Developments" Map and the application. The simple answer is that it is fracked gas coming from the Marcellus area of Pennsylvania.

3. Growth in Data Centre Emissions

The IEA's "Electricity 2024: Analysis and forecast to 2026" they state:

"Electricity demand from data centres in Ireland was 5.3 TWh in 2022, representing 17% of the country's total electricity consumed. That is equivalent to the amount of electricity consumed by urban residential buildings. At this pace, Ireland's data centres may double their electricity consumption by 2026, and with AI applications penetrating the market at a fast rate, we forecast the sector to reach a share of 32% of the country's total electricity demand in 2026. Ireland's stock of data centres, currently at 82, is expected to grow by 65% in the coming years, with 14 data centres under construction and 40 approved to start the building phase."²

This % of national electricity being given over to Big Tech is unprecedented globally, with Singapore's 7% of electricity being given over to Data Centres the next highest percentage. State Agencies, including An Bord Pleanála have neglected their duty by facilitating this gross mismanagement of infrastructure which should be used for the common good, but which are being turned more and more into corporate facilitation infrastructure. Given how far from the global norm that Ireland is deviating, we believe that the post-colonial aspects of this new departure, that Ireland has departed on over the last 10 years, should be explored. Some civil servants did attempt to question the logic of this corporate takeover of our electricity system such as Eirgrid Group Head of Regulation, Bill Thompson writing to the CRU in May 2021 stating:

"Ireland's electricity system was surely not planned to be, nor designed to be, a system which seeks to serve the needs of the global citizen for increased data supported by an ever proportionately smaller non-data centre commercial, industrial and domestic load. Whilst not questions first and foremost for EirGrid it surely must as part of this, give rise to consideration and potentially wider national debate as to that which is in the public interest in this regard."

In the meantime, An Bord Pleanála seems determined to make the situation worse both in terms of energy security and increasing our emissions, evident in the recent granting of another data centre projected to emit 657,000 tonnes of CO₂ per annum.³

4. Conclusion

This project will lead us further down the path to extreme Climate chaos and should be rejected out of hand.

Signed

Eoin O Leidhin

Gluaiseacht

www.gluaiseacht.ie

Postal Address: 7 Carrigmahon Place, Monkstown, Co. Cork

² <https://www.iea.org/reports/electricity-2024>

³ <https://www.thejournal.ie/an-bord-pleanala-e1-2-billion-data-centre-campus-ennis-6350115-Apr2024/>

