From:	Tony Lowes
To:	SIDS
Subject:	An Coimisiún Pleanála Reference PA08.322568-25 Submission on Further Information Responses
Date:	Friday 26 September 2025 12:41:13
Attachments:	FIE_Observation_On_Shannon_LNG_FI_Responses 22.09.25.pdf

22 September, 2025

Dear Sir or Madam;
Attached is the submission from Friends of the Irish Environment to the Further Information provided on the application of Shannon LNG 10 year permission for proposed Shannon Technology and Energy Park consisting of power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works.
We would be grateful for an acknowledgement.
Tony Lowes, on behalf of Friends of the Irish Environment

Friends of the Irish Environment is non-profit Company Limited by Guarantee and a Charity registered

in Ireland. It is a member of the European Environmental Bureau and the Irish Environmental Network.

Registered Office: Kilcatherine, Eyeries, Co Cork, Ireland. P75 CX53 Company No. 326985.

Charities Registration No. 20154530 Tel & Fax: 353 (0)27 74771 Email: admin@friendsoftheirishenvironment.org

Trustees and Directors: Kieran Cummins, Tony Lowes, Ian Lumley Judy Osborne (UK)

Our politicians are not leaders. They are followers.
That is why mobilisation is the key to change.

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

By email to sids@pleanala.ie

22 September 2025

Reference: An Coimisiún Pleanála Reference PA08.322568-25 [1]

Applicant: Shannon LNG

Description: 10 year permission for proposed Shannon Technology and Energy Park consisting of power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works.

Development Address: Townlands of Kilcolgan Lower and Ralappane, Ballylongford, Co. Kerry.

A Cháirde,

Friends of the Irish Environment (FIE) welcomes the opportunity to make this submission on the further information responses received from

1 https://www.pleanala.ie/en-ie/case/322568

Shannon LNG and from the Department of Climate, Energy and the Environment concerning the Shannon LNG planning application, which we oppose for the reasons set out below.

1. Executive Summary

Friends of the Irish Environment (FIE) opposes the proposed Shannon LNG terminal and associated 600 MW power station as inconsistent with Ireland's climate law, national policy, and the public interest.

The project directly conflicts with the Government's March 2025 decision to limit Floating Storage and Regasification Units (FSRUs) to state ownership, emergency-only use, and transitional deployment. By contrast, Shannon LNG proposes a private, permanent commercial facility capable of injecting up to 170% of current national gas demand, duplicating and undermining the State reserve.

The associated 600 MW gas-fired power station would emit up to 1.8–2.0 $MtCO_2eq$ annually, nearly three times higher than the applicant's Environmental Impact Assessment Report (EIAR) estimate and would consume up to one-third of the electricity sector's 2030 carbon ceiling. This scale of impact is irreconcilable with Ireland's binding carbon budgets. As clarified by the High Court in *Coolglass Windfarm v. An Bord Pleanála [2025] IEHC 1*, section 15 of the Climate Act imposes a comply-with obligation: the Board must refuse consent for projects that drive exceedance of sectoral ceilings.

Economically, the project seeks a €494 million capacity contract, costs that would be passed directly to households in a country already facing some of the highest electricity prices in Europe. With over 3 GW of new gas-fired generation already consented, above the national target, this project represents unnecessary and costly duplication.

Procedurally, no Strategic Environmental Assessment of LNG policy has been conducted. Moreover, the EIAR fails to account for lifecycle emissions, omits testing against statutory ceilings, and contains methodological errors so extensive and fundamental that the climate chapter of the EIAR cannot be regarded as having been prepared by competent experts. As such, it fails to meet the requirements of the EIA Directive and cannot provide a reliable basis for decision-making.

For these reasons, statutory non-compliance, excessive emissions, direct conflict with Government policy, unjustified consumer costs, and unresolved legal deficiencies, Friends of the Irish Environment respectfully submits that permission must be refused.

2. Conflict with the March 2025 Policy Decision

- On 4 March 2025, the Government approved the development of a state-led strategic gas emergency reserve, to be operated by Gas Networks Ireland as a Floating Storage and Regasification Unit (FSRU).
- The approved policy clearly limits such infrastructure to state ownership, emergency-use only, and transitional deployment to ensure security of supply.
- By contrast, the current application proposes a private, permanent commercial LNG terminal. This is fundamentally inconsistent with the scope and intent of the Government’s policy decision.
- Approval of this application would undermine the coherence of national energy policy and create duplication with the newly approved State reserve.

3. Greenhouse Gas Emissions Assessment

According to the EIAR (2021), the thermal efficiency of the 600 MW CCGT power plant is 54% [2, page 3-26]. Table 15-17 states that operational GHG emissions in 2026 would be 712,812 tCO_2eq/yr [3, page 15-26]. It is clarified that the estimate was based on the power plant operating at 100% capacity:

> "… emissions for the opening year for the plant running at maximum capacity are estimated at 712,596 tCO_2e …". [3, page 15-38]

The annual GHG Emissions can be calculated as:

> = (600 MW × 8,760 hr/yr × 204 kg/MWh) / 54% / 1,000 kg/t
>
> = 1,985,600 tCO_2eq/yr

Where 600 MW is the power rating of the plant; 8,760 hours in a year; and 204 kg/MWh (rounded) is the SEAI emissions factor for Natural Gas (Net Calorific Value)[4].

The calculated 1,985,600 tCO_2eq/yr exceeds the EIAR statement of 712,596 tCO2eq/yr by a **factor of 2.786**.

The EIAR references a different emissions factor for fuel gas to that used by SEAI, [3, page 15-25, and 5, page 14]:

> "Carbon emissions associated with annual electricity generation have been calculated from the Baringa Shannon Wholesale & Ancillary Revenue Report with 184g per kWh emissions factor applied for natural gas."

2 https://cdn.stepplanning.com/EIAR/chapters/STEP_EIAR_03_Need_and_Alternatives.pdf
3 https://cdn.stepplanning.com/EIAR/chapters/STEP_EIAR_15_Climate.pdf
4 https://www.seai.ie/sites/default/files/data-and-insights/seai-statistics/conversion-factors/SEAI-conversion-and-emission-factors.xlsx
5 https://cdn.stepplanning.com/planning/documents/SLNG_ABP_RFI_Submissions.pdf

In the alternative instance, the annual GHG Emissions can be calculated as:

= (600 MW × 8,760 hr/yr × 184 kg/MWh) / 54% / 1,000 kg/t

= 1,790,933 tCO_2eq/yr

The calculated 1,790,933 tCO_2eq/yr exceeds the EIAR statement of 712,596 tCO2eq/yr by a **factor of 2.513**.

Even under the applicant's preferred emissions factor of 184 gCO_2eq/kWh (based on GCV), the calculated figure still exceeds the EIAR estimate by a factor of 2.5. Moreover, the use of GCV is not an appropriate basis for assessing greenhouse gas emissions from this fuel.

The EIAR justification for using GCV appears to reflect a misunderstanding of the difference between NCV and GCV. In practice, the gross–net difference is the latent heat of vaporisation of the moisture content of fuel. As such, the methodological basis for applying GCV in this context is technically unsound.

The errors identified are of such a scale and nature that the climate chapter of the EIAR cannot be considered to have been prepared by competent experts. The deficiencies in the EIAR, including methodological errors, mean it does not satisfy the requirements of the EIA Directive and therefore cannot provide a reliable basis for decision-making.

Heat recovery should be reflected through the efficiency adjustment, not by altering the emissions factor. SEAI guidance confirms that NCV represents the "actual usable energy" and is therefore the appropriate basis for calculation. In addition, see EU guidance [6, page 8]:

> "The quantity known as net calorific value (NCV) (or lower heating value or lower calorific value) is determined by subtracting the heat

6 https://ec.europa.eu/eurostat/documents/38154/4956218/ENERGY-BALANCE-GUIDE.pdf

of vaporization of the water vapour from the higher heating value. This treats any H2O formed as a vapour. The energy required to vaporize the water therefore is not released as heat."

The IPCC sets out the following [7, page 8]:

> "The accounting of combustible sources, including all fossil energy forms and biomass, includes some ambiguities related to the definition of the heating value of combustible fuels. The higher heating value (HHV), also known as gross calorific value (GCV) or higher calorific value (HCV), includes the latent heat of vaporization of the water produced during combustion of the fuel. In contrast, the lower heating value (LHV) (also: net calorific value (NCV) or lower calorific value (LCV)) excludes this latent heat of vaporization. For coal and oil, the LHV is about 5% smaller than the HHV, for natural gas and derived gases the difference is roughly 9–10%, while the concept does not apply to non-combustible energy carriers such as electricity and heat for which LHV and HHV are therefore identical (IEA, 2012a)."

While the applicant's website materials date from 2022, the Environmental Impact Assessment Report (EIAR) was prepared before the 2021 amendments to the Climate Action and Low Carbon Development Act 2015 came into effect, and prior to the adoption of the subsequent Climate Action Plans, carbon budgets, and Sectoral Emissions Ceilings. As a result, the EIAR primarily references the 2021 Climate Action Plan and does not contain a substantive assessment against the full suite of statutory climate obligations now in force. This raises a concern that the EIAR, as currently drafted, does not fully align with the requirements of the EIA Directive, which requires consideration of the project in the light of prevailing legal and policy frameworks.

7 https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_wg3_ar5_annex-ii.pdf

In terms of compliance with the national climate objective, where a project is not explicitly supported by the most recent Climate Action Plan, the onus is on the developer to demonstrate compatibility with Ireland's binding carbon budgets. This requires:

- Identifying how much of the relevant sectoral carbon budget remains in the current and subsequent periods;
- Quantifying the share of that budget which the proposed development would consume; and
- Justifying, where necessary, any such use of the limited carbon budget on the basis of overriding public interest.

Without such an assessment, it is not possible to conclude that the project is consistent with Ireland's statutory pathway to climate neutrality.

4. The Law on Indirect Effects:

Footnote 22 on page 13 of the Shannon Technology and Energy Park Response to An Bord Pleanála Submissions received 5th July 2022 (August 2022) [8], reads:

> "The reasons why were recently outlined in a case brought before the High Court , An Taisce v. Kilkenny Cheese Limited [2022] IESC 822, where An Taisce took judicial review proceedings seeking to quash the decision to grant planning permission to construct a cheese factory in Slieverue, Kilkenny, detailing that the Board had failed to conduct an adequate environmental impact assessment of the factory's indirect impact associated with milk production in the State. The High Court refused to grant the application for judicial review and also refused to certify any points of appeal to the Court

8 https://cdn.stepplanning.com/planning/documents/SLNG_ABP_RFI_Submissions.pdf

of Appeal. In September 2021, the appellant obtained leave to appeal directly to the Supreme Court. The Supreme Court upheld the High Court ruling, and ruled that upstream consequences of the proposed factory, specifically from milk production, were not indirect significant effects liable to be assessed under the EIA (Environmental Impact Assessment) Directive or the Habitats Directive. The court moved to consider the meaning of Article 3(1) and offered two interpretations. First, the obligation to assess indirect effects could be read in an open-ended fashion and that any effects on the environment have to be considered. The second interpretation was that indirect effects must only be those which the development itself has on the environment. The Supreme Court preferred the second interpretation on the basis of (i) workability and (ii) the language of the EIA Directive which "strongly suggest that the information to be supplied must be firmly tethered to the project itself". The Court cited with approval two UK cases – Greenpeace Limited v. The Advocate General [2021] CSIH 53 and R (Finch) v. Surrey County Council [2020] EWHC 3566 (Admin) – where the courts held there was no obligation to assess the consumption of oil and gas by an end user as a direct or indirect significant effect of the exploitation of the hydrocarbons. In discussing the proper scope of the EIA Directive, the Supreme Court stated, "it should not, so to speak, be conscripted into the general fight against climate change by being made to do the work of other legislative measures such as the [Climate Action and Low Carbon Development (Amendment) Act 2021]". The appeal against the UK High Court decision in Finch has since been dismissed: [2022] EWCA Civ 187."

The UK Supreme Court overturned Court of Appeal decision in Finch, therefore, footnote 22 is no longer a correct statement of the law on indirect effects.

5. Prematurity and Policy Sequencing

- The Government has concluded the Energy Security Review with the approval of the state-led FSRU. That decision defines the appropriate path for gas security measures.
- Any private LNG facility at this stage is premature, as it would pre-empt the State's policy framework and risk locking in a market-driven gas import model contrary to the expressly limited, emergency-only approach endorsed by Government.

6. Climate Law Obligations

- The Climate Action and Low Carbon Development Acts impose binding carbon budgets and sectoral ceilings.
- The associated 600 MW gas-fired power station would account for up to one-third of the electricity sector's 2030 ceiling, severely constraining compliance options.
- LNG imports carry significantly higher lifecycle emissions than pipeline gas from the UK or Norway, increasing the likelihood of non-compliance with climate obligations.
- While the State-led FSRU is designed as an emergency reserve, a permanent commercial facility would expand fossil fuel dependency and undermine Ireland's transition trajectory.
- The obligations on An Bord Pleanála under section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended) have been clarified by the High Court in Coolglass Windfarm v An Bord Pleanála [2025] IEHC 1 [9]. The Court held that section 15 imposes a "comply-with obligation" rather than a mere duty to "have regard to" climate plans and carbon budgets. This requires all relevant bodies, including the Board, to exercise their discretionary and

9 https://ww2.courts.ie/acc/alfresco/c6e01981-1045-4571-af0c-06d260290823/2025_IEHC_1.pdf/pdf

evaluative powers in whatever way is most likely to be consistent with the Climate Action Plan, carbon budgets, sectoral ceilings, and the national climate objective, unless it is genuinely impracticable to do so.

- The Climate Action Plan 2024 and 2025, together with the EPA's 2023–2050 projections, show that the electricity sector is already projected to exceed its carbon budget by approximately 1 $MtCO_2eq$ in the second carbon budget period. The proposed 600 MW gas-fired power station associated with Shannon LNG would on its own consume up to one-third of the 2030 electricity sector ceiling. In circumstances where the sector is already projected to breach its statutory limits, there is **no spare carbon budget** for additional fossil generation. Granting permission would therefore be inconsistent with section 15 obligations and the national climate objective.
- Furthermore, the Climate Action Plans only envisage limited new gas capacity (c.2 GW) to act as backup to facilitate the growth of renewables. They do not identify or support permanent LNG infrastructure of the scale proposed. A project that is not supported in the Climate Action Plans and that would drive exceedance of the sectoral ceilings cannot lawfully be authorised.
- The Government has determined that a single, state-owned FSRU is sufficient to mitigate energy security risks.
- A commercial LNG terminal of the scale proposed (injecting up to 170% of current national demand) would overshoot security requirements, stimulate unnecessary gas consumption, and risk becoming a stranded asset as renewables expand.

7. Existing and Consented Plants

- An Coimisiún Pleanála is referred to a separate Appeal (PL17.323483 and Meath County Council 2460842) and the referenced submission by the Appellants Friel, Ingman and Carroll, which submits an overview of fossil gas power plants that are existing, permitted and at stages of application to those submitted by the Applicant [10, pages 7-10].

8. National Energy and Climate Plan (NECP) 2021-2030

The NECP outlines how Ireland intends to achieve its 2030 climate and energy targets, including measures on emissions reduction, renewable energy, and energy efficiency. Ireland's integrated National Energy and Climate Plan 2021-2030 [11] includes "Figure 31: Total primary energy requirement by fuel (WAM)" on page 390, as shown in Figure 1 below.

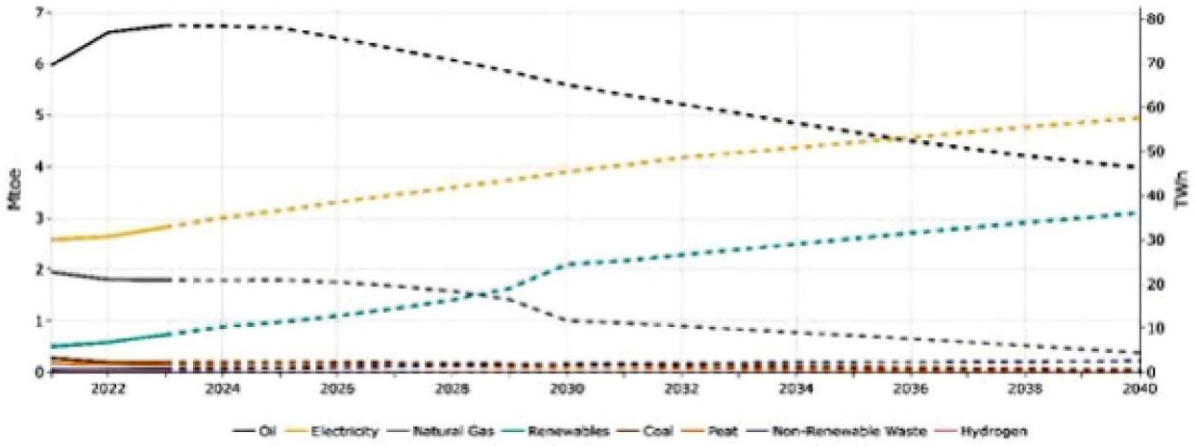

Figure 1 "Figure 31: Total primary energy requirement by fuel (WAM)"

The NECP is now showing a 33% drop in demand from 2025 to 2030.

10 https://idocswebdpss.meathcoco.ie/iDocsWebDPSS/ViewFiles.aspx?docid=2692658&format=djvu

11 https://assets.gov.ie/static/documents/irelands-integrated-national-energy-and-climate-plan-2021-2030.pdf

The introduction to the Environmental Impact Assessment Report (EIAR) Volume 2 – Main Text [12, page 1-4] includes "Figure 1-1 Irish Gas Supply and Demand" with a reference to "Source: The National Energy and Climate Change Plan 2021 to 2030 (NECP), Figure 23 Total Primary energy requirement by fuel (WAM) Figure 23 and CRU18105 Copy of Corrib Linkline Element Calculation 2018/19" as shown in Figure 2 below.

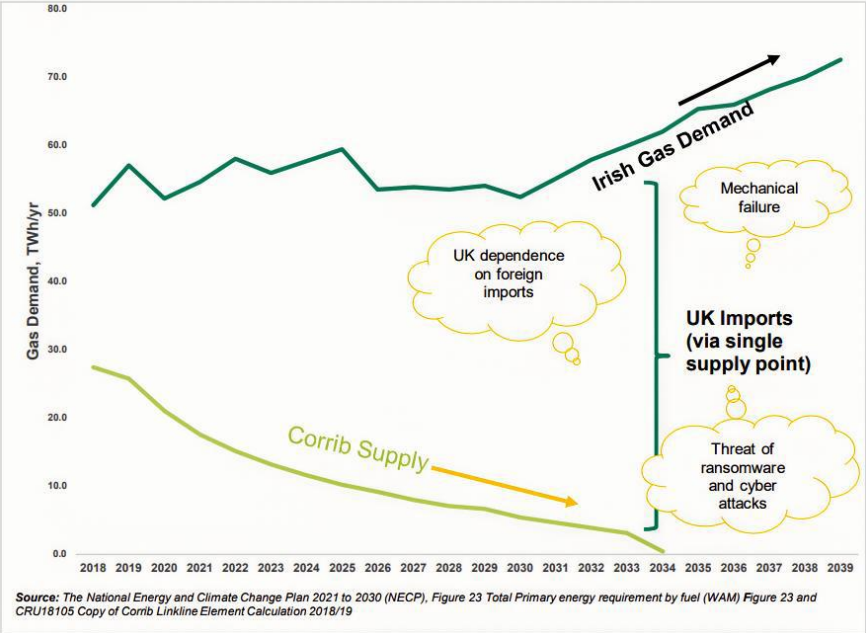

Figure 2 "Figure 1-1 Irish Gas Supply and Demand"

The document CRU18105 Corrib Linkline Element Calculation 2018/19 was not available on the CRU website at the time of this submission.

It appears that the logic set out in the "EIAR Figure 1-1" does not reflect that set out in the NECP "Figure 31" and should not be relied upon as an accurate representation of state policy.

12 https://cdn.stepplanning.com/EIAR/chapters/STEP_EIAR_01_Introduction.pdf

9. Economic and Consumer Burdens

- The project seeks a 10-year €494 million capacity contract, costs which would be passed to households through capacity payments.
- Ireland already has some of the highest electricity costs in Europe.
- With over 3 GW of new gas-fired generation already consented (above the 2 GW national target), this project represents unnecessary duplication with significant consumer cost implications.
- The Energy Charter Treaty (ECT) creates obligations for its contracting parties to foster investments in the energy sector by providing protections for foreign investors and establishing a framework for cooperation and trade in energy. Key obligations include affording foreign investors fair and equitable treatment and constant security for their investments, and observing contractual commitments made to investors. Investors can sue governments through Investor-State Dispute Settlement (ISDS), a mechanism that has been criticized for undermining climate policy by allowing fossil fuel companies to seek damages for government actions like phasing out emitting fuel sources. To permit the proposed development would render the state vulnerable to financial costs and would undermine the decarbonisation efforts of the national climate objective.

10. Legal and Procedural Concerns

- The 600 MW power station element is already subject to Judicial Review for inadequate climate assessment. Approving related components before that process concludes would undermine judicial oversight.
- A Strategic Environmental Assessment (SEA) of LNG infrastructure policy has not been carried out, despite the recognised scale and significance of such infrastructure decisions.

- The requirements of the EIA Directive reinforce these obligations. Article 3(1)(c) and Annex IV require that the environmental impact assessment identify, describe and assess, in an appropriate manner, the impact of a project on climate. The jurisprudence of the Court of Justice confirms that "appropriate" in this context includes testing compliance with substantive environmental law. An Environmental Impact Assessment Report that omits lifecycle emissions analysis, fails to assess consistency with sectoral ceilings, and does not demonstrate compliance with the Climate Act framework cannot meet the legal requirements for consent.
- Accordingly, unless the applicant can demonstrate that the project's emissions are compatible with the binding electricity sector ceiling and the Climate Action Plans, the Board is legally obliged under section 15 of the Climate Act to refuse permission.
- Section 4(8) of the Climate Action and Low Carbon Development Act 2015 (as amended by the 2021 Act) requires decision-makers to consider the risk of unreasonable carbon leakage when exercising their functions. The Act defines carbon leakage as:
    - "'carbon leakage' means the transfer, due to climate policies, of production to other countries with less restrictive policies with regard to greenhouse gas emissions."
- LNG imports, particularly from US fracked gas, carry high embedded emissions, undermining both Ireland's and the EU's Paris Agreement commitments.
- The precautionary principle obliges refusal where significant risks of disproportionate global harms are identified and not mitigated.

11. Precautionary Principle

- Given the clear difference between the State-approved, emergency-only reserve and this private commercial proposal, combined with unresolved climate, economic, and legal risks, the precautionary principle requires that permission be refused.

12. Conclusion

The proposed Shannon LNG terminal and associated 600 MW power station cannot be reconciled with Ireland's statutory climate obligations, national policy framework, or the public interest. The project:

- **Conflicts with Government policy** by proposing a permanent, private LNG terminal capable of injecting up to 170% of current national demand, in direct contradiction to the State's decision to develop a single, emergency-only FSRU under public ownership.
- **Is premature and inconsistent with the Climate Action Plans**, which envisage only limited new gas capacity (~2 GW) to back up renewables, while projections already show the electricity sector exceeding its statutory carbon ceilings.
- **Would consume a disproportionate share of the carbon budget**, with the power station alone emitting up to 1.8–2.0 $MtCO_2eq$ annually, nearly three times the EIAR's estimate, and accounting for as much as one-third of the 2030 electricity sector ceiling.
- **Poses energy security and stranded asset risks**, locking Ireland into unnecessary fossil fuel capacity that duplicates the State reserve and undermines the transition to renewables.

- **Imposes unjustified economic burdens**, including a proposed €494 million capacity contract that would raise costs for consumers in an already high-cost electricity market.
- **Fails legal and procedural requirements**, as the EIAR contains methodological errors, omits lifecycle emissions and compliance testing against sectoral ceilings, and no Strategic Environmental Assessment of LNG policy has been conducted. The identified errors are so extensive and fundamental that the climate impact assessment cannot be regarded as having been prepared by competent experts. As a result, the climate chapter of the EIAR fails to meet the requirements of the EIA Directive and cannot serve as a reliable basis for decision-making. In light of *Coolglass Windfarm v. An Bord Pleanála* [2025] IEHC 1, the Board is legally obliged to refuse permission for projects incompatible with carbon budgets and Climate Action Plans.

For these reasons, policy conflict, excessive emissions, carbon budget exceedance, stranded asset risk, unjustified consumer costs, and statutory non-compliance, Friends of the Irish Environment respectfully submits that **permission must be refused**.

Yours faithfully,

Tony Lowes, Director

on behalf of **Friends of the Irish Environment**

Annex I

Friends of the Irish Environment CLG (**FIE**) is a non-governmental charity formed in 1997 by a group of environmental activists from across Ireland, with the company limited by guarantee established in 2001, towards the following goals:

- monitoring the full implementation of European law and assisting in its development,
- advocating for changes in the Irish planning laws,
- encouraging the implementation of the right to full public participation and access to justice,
- supporting individuals, local groups, and the wider public in understanding environmental issues, and
- seeking the proper implementation of environmental and planning laws to support sustainable communities, including pursuing concerns and cases in both the built and natural environments.

In recent years, FIE has taken legal action to hold the Irish Government accountable for meeting national and international commitments to reducing carbon emissions, including the "Climate Case Ireland" on the adequacy of the Government's Mitigation Plan. [13]

FIE conducts policy research, advocacy, and public awareness campaigns alongside litigation. As an independent and principled environmental advocate, FIE strives to be both challenging and cooperative, effective yet respectful. A commitment to fact-finding, truth-telling, integrity, and transparency drives FIE. FIE is a member of the Irish Environmental Network and the European Environmental Bureau. [14, 15]

13 https://www.ejiltalk.org/the-supreme-court-of-irelands-decision-in-friends-of-the-irish-environment-v-government-of-ireland-climate-case-ireland/

14 https://ien.ie/

15 https://eeb.org/

Our Case Number: ABP-322568-25

An Coimisiún Pleanála

Friends of the Irish Environment
Kilcatherine
Eyeries
Co. Cork
P75 CX53

Date: 26 August 2025

Re: 10 year permission for proposed Shannon Technology and Energy Park consisting of power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works.
Townlands of Kilcolgan Lower and Ralappane, Ballylongford, Co. Kerry.

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above-mentioned case and in particular to the further information requests issued by the Commission.

Responses to the requests for further information were received from Shannon LNG on 1st August 2025 and from the Minister for Climate, Energy and the Environment on 5th August 2025, and the Commission is of the opinion that it is appropriate to invite you to make submissions or observations relation to the further information responses which are enclosed.

Your submission or observation in response to this notice must be received by the Commission within 4 weeks of the date of this letter (i.e. **not later than 5:30pm on Monday 22nd September 2025**).

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email sids@pleanala.ie quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,

PP EGM

Ellen Moss
Executive Officer
Direct Line: 01-8737285
PA36

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