

9 Doonard Crescent,
Tarbert,
Co Kerry.
5th September 2025.

An Coimisiun Pleanála,
64 Marlborough Street
Dublin 1

AN COIMISIÚN PLEANÁLA
LDG- _____
ACP- _____
16 SEP 2025
Fee: € _____ Type: _____
Time: _____

Re: ABP-322568-25

I refer to your letter of 26th August 2025, and, having read the Applicant's letter, respond as follows:

1. Security of Energy Supply update

In July 2025, the CRU issued its draft Risk Preparedness Plan. Section 2.5a deals with loss of fossil fuels through the gas inter-connectors from the UK and describes the impact as 'Disastrous' and the overall rating as 'High'. It states that there would be no advance warning and that the crisis would last 6 months.

Incidents such as the destruction of the Nord Stream pipeline in 2022 and the Baltic connector pipeline in 2023 highlight the ease with which such events can happen.

On 30th August 2025, the new Chief of the Defence Forces, General Mulcahy, expressed concerns about Ireland's ability to monitor our seas, among concerns about activities of the Russian 'Phantom Fleet'.

On 30th August 2025, the indigenous gas output from Corrib gas field was only 10% of peak daily demand - when the need is greatest. 50% of Ireland's electricity was generated from natural gas in 2024. This highlights the importance of Security of Energy Supply.

2. Previous reports on Energy Security.

The Long-Term Resilience Study was published in August 2018. This study was commissioned by DCCAE, produced by GNI and Eirgrid and concluded that: "The most economically advantageous option to improve the resilience of Ireland's gas supply is a floating LNG terminal."

In July 2018, and again in 2019, The Irish Academy of Engineering issued reports on Ireland's Energy Security concluding that "Developing an LNG import terminal would enhance Ireland's security of supply and provide access to the competitive global gas market."

3. Irish Government Support for an LNG import terminal and this project – (as well as EU agencies.)

On several separate occasions between 2012 and as late as June 2019,

- (a) the Irish Department of Energy formally informed the European Commission on its view of Ireland's needs in the Energy sector – i.e. Ireland's reliance on gas for electricity, Corrib decline, peripherality especially re Brexit etc.
- (b) following a detailed cost-benefit analysis done by the Commission to validate the claims of the project, the Department of Energy formally acknowledged that the Shannon LNG project was the best option to meet Ireland's needs and strongly supported the project. The CRU, which is the independent agency responsible for maintenance of Ireland's security of supply, (not the Department) also supported the project to the EU.

Even before this, ENTSOG (European Network of Transmission System Operators for gas) had, highlighted the projects' socio-economic benefits for the EU energy system. 4th list approved by the European Parliament in February 2020.

As a consequence, the Shannon LNG Project was repeatedly designated a Project of Common Interest (PCI) by the EU, as a result of the repeated and consistent support of previous Governments, at least until June 2020.

PCIs benefit from a number of advantages: including e.g. (a) *streamlined permit granting procedures (a binding **three-and-a-half-year time limit**)*; (b) *improved, faster and better streamlined environmental assessment. TEN-E regulation requires them to be treated as urgent projects of the highest national significance, including in any dispute resolution.*

In 2019, the then Minister for Communications, Climate Action and Environment (**Richard Bruton**) announced that the Department would conduct a review of the security of energy supply of Ireland's electricity and natural gas systems.

4. Change of Government direction

In 2020, the new Minister (Eamonn Ryan) withdrew support for the project from the PCI list in 2021.

On 10th May 2021, 2 years after being proposed by Richard Bruton, Minister Ryan – finally commissioned Cambridge Economic Policy Associates (CEPA) “to undertake a technical analysis of physical security of supply to inform the Security of Supply Review”.

On 18th May 2021, Minister Ryan published a press release stating that he had received Government approval for a “Policy Statement on the Importation of Fracked Gas”. In the press release, the Minister stated that the policy included a “moratorium on the development of LNG import terminals pending the completion of review of security supply.”

(p.s. In a postscript to his judgement on 24th Mar 25, Judge Humphries described the terminating of the fracking policy as “seismic”. If so, it’s imposition, and moratorium, were equally seismic, in contrast to previous Governments support.)

5. High Court Judgement, 30th September 2024.

The Judgement states (Section 164) “*it’s obvious that whatever it was, the review clearly wasn’t an entirely open-minded and thorough consideration of all economic and environmental pros and cons of all potential options. The applicant’s preference was effectively ruled out.*”

The effective part of the judgement concludes (167) : “*the board misclassified a consultation document by listing it under the heading of national policy -- which is an error in lawful consideration; (ii) accordingly, core ground 4 is being upheld*”.

The contention of the Applicant was that (141) An Bord Pleanala “*abdicated its decision-making function*” by “*slavishly relying on this statement in arriving at its unlawful decision.*” (Core Ground 4).

The comments by the Judge (146) that the Board’s unquestioning acceptance of the Inspector’s misclassification of policy was overly-casual, particularly “*because the review is wired in to the critical section of the inspector’s reasoning.*”

6. Delay

The Judge (Section 116) notes that “the applicant effectively stated that it was suspicious that the publication of the review was held up until after the board decision.”

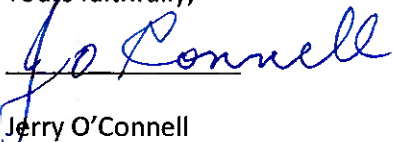
In Section 166, the judgement continues - “*as regards efficiency in decision-making, it would appear on the face of things desirable for there to be an actual conclusion to the review of energy security and gas supply policy that has been ongoing for the best part of two and a half years. --- ---The State in submissions effectively sought to attribute the delay to the Russian Federation’s full-scale invasion of Ukraine, but that should be a reason to speed matters up, not to slow them down*”.

Even though Minister Ryan’s actions (moratorium on LNG terminals) tried to rule out Shannon LNG’s project, the **Energy Security Report actually proposed an FSRU based system** to preserve Ireland’s security of supply, as had been the conclusion of numerous similar reports going back years – as well as the Department and CRU, as mentioned above.

The Energy Security report was published in November 2023 and approved by Government in March 2025 - Six years after being proposed by Minister Richard Bruton in 2019.

Considering that the previous 2 Governments had spent 7 or 8 years (2012-2019) actively promoting this project, I believe that Shannon LNG in this case was treated blatantly unfairly, and An Coimisiun Pleanala should finally and, without further delay, grant permission for this project.

Yours faithfully,



Jerry O'Connell