



Submission Regarding Case Number: ABP-322568-25

Dear An Coimisiún Pleanála,

Firstly, Limerick Chamber would like to thank you for inviting us to make a submission again on the above planning case. Secondly, we would like to thank you for keeping us updated with relevant materials throughout the process.

There is a clear need to strengthen Ireland's energy security, diversify sources, and ensure greater competition in the market. Our members continue to face challenges in expanding their operations due to energy supply constraints, which is impacting investment and growth. In some cases, energy reliability is already affecting day-to-day business operations, which underlines the urgency of addressing this issue.

In this context, the Shannon LNG Project could play an important role in the interim, helping to safeguard security of supply, provide greater diversity, and underpin competitiveness while Ireland accelerates its transition toward renewable energy sources. Importantly, such a development could also facilitate the creation of a strategic gas reserve – a capability Ireland currently lacks.

It is concerning that the project has experienced significant delays in recent years due to policy uncertainty. A more agile and responsive policy framework would help ensure that Ireland can put in place interim measures like LNG, while continuing to drive forward the long-term ambition of a secure, renewable-led energy system.

1. European Union Policy on Liquefied Natural Gas

Since 2015, the European Union has progressively advanced its approach to Liquefied Natural Gas (LNG) as part of its Energy Union Strategy, aiming to secure sustainable, competitive, and diversified energy supplies. The 2016 EU LNG and Gas Storage Strategy emphasized that all Member States should have access to liquid gas markets, with diversified supply sources strengthening energy security and resilience, a goal reinforced by joint EU-U.S. statements in 2018 promoting increased U.S. LNG imports. By 2019, the EU had co-financed over €638 million in LNG infrastructure projects, supporting 14 initiatives, and by early 2022, cumulative U.S. LNG imports had reached over 64 billion cubic meters. In response to the 2022 Russian invasion of Ukraine, the Commission launched the REPowerEU Plan, securing record LNG imports, promoting pooled gas purchases through the EU Energy Platform, and accelerating renewable energy deployment. Complementing this, the 2020 EU Taxonomy Regulation and the 2022 Complementary Climate Delegated Act recognized certain gas activities as transitional fuels to aid the EU's climate and diversification objectives. Further, the 2023 EU-Japan LNG dialogue and the 2024 Internal Market Regulation expanded LNG market transparency, demand aggregation, and future-ready infrastructure assessments, including renewable and low-carbon gases, with ENTSOG simulations scheduled for 2026 to model supply disruptions.

Furthermore, Limerick Chamber believes, due to the concentration of current and future energy infrastructure along the Shannon Estuary, that the inclusion of an LNG terminal creates synergy with existing uses.

The **Strategic Integrated Framework Plan for the Shannon Estuary (SIFP)** in its written statement, when focusing on the LNG terminal, that *“such significant investments, particularly in energy infrastructure are likely to be a catalyst for other major foreign investment in the region”*. In fact, the *Southern RSES outlines the SIFP for the Shannon Estuary as a good practice planning example, highlighting the “Shannon Gas LNG project are a further example of the regional and national potential of the location”*. Furthermore, the *Southwest Regional Planning Guidelines*, further reiterates the LNG plant acting as a catalyst for the development of strategic gas network in the area.

The **Shannon Estuary Economic Taskforce (SEETF)** further supported the construction of an LNG facility, outlining that *“the Taskforce remains of the view, expressed in our interim report, that an **LNG import / storage facility and electricity generation would be a significant strategic investment in the North Kerry / West Limerick region**. Most importantly, it would greatly assist efforts to attract other large capital investments there”*.

4. Energy Security

In 2023, the World Energy Council (WEC) **provided Ireland with a “C” grade for energy security**, at the same time, most counties in West Europe received an “A” grade for energy security. The WEC’s Energy Security score reflects a country’s ability to reliably meet current and future energy demands, recover quickly from disruption, and maintain steady energy supplies. It included the management of both domestic and external energy sources and the resilience of energy infrastructure.

The Energy Sovereignty Index, **produced** by the European Council on Foreign Relations (ECFR), ranks **Ireland’s energy sovereignty at 5.3 out of 10.0, below the EU average of 6.1**, this is largely driven by Ireland’s low score in the area of energy independence, scoring just 2.5 out of 10.0. In terms of energy sovereignty, the ECFR classed Ireland as “falling”. The ECFR’s Energy Sovereignty Index shows both progress and persistent pitfalls on the EU’s path to energy independence, efficiency, and cleanness.

The International Energy Agency (IEA) 2024 Energy Policy Review for Ireland, **highlighted** that *“**gas will remain critical to meet peak electricity demand**”* citing the demand for gas being largely driven for electricity *“Electricity demand is expected to grow strongly with the electrification of the transport and heating sectors as part of Ireland’s energy transition but also reflects the government’s success in attracting investment in data centres to make Ireland a world hub of Internet connectivity (see Chapter 2). Winter peak gas demand is therefore expected to rise.”*

The IEA report further highlights the challenge of Ireland relying exclusively on a non-EU member for its gas imports, highlighting that even though bi-lateral agreements are in place, *“the United Kingdom is not bound by the EU’s framework for security of gas supply, including the sharing of gas supplies in an emergency situation”*. The report also outlines that Ireland does not meet the N-1 criteria for gas security of supply given its dependence on one single gas injection point, outlining that Ireland needs to consider this possible single point of failure when address security of supply options. The N-1 criteria of an EU regulation requires that gas demand be met in the event of the loss of a country’s largest single piece of gas infrastructure. Finally, the IEA report highlighted that *“An*

Appendices

Appendix 1: European Union Policy Approach to Liquefied Natural Gas

[The Energy Union Strategy](#) (2015) sought to create an energy union that provides EU consumers - both households and businesses - with secure, sustainable, competitive, and affordable energy. It emphasised the advantages of developing liquid gas infrastructure, noting that hubs with multiple suppliers significantly strengthen supply security. The strategy encouraged replicating this model throughout Europe. It also included a commitment to drafting a comprehensive plan for liquefied natural gas (LNG) and its storage, which the EU delivered in 2016.

The [EU Liquefied Natural Gas and Gas Storage Strategy](#) (2016) stresses that diversifying supply sources is essential not only for energy security but also for competitiveness. A central goal of the EU's Energy Union is to ensure that every Member State has access to liquid gas markets. At present, Ireland lacks such access due to both insufficient infrastructure and limited political will. The strategy further notes that Western European countries with LNG import terminals and liquid gas markets are significantly more resilient to supply disruptions than those reliant on a single supplier.

By 2030, Ireland is expected to become more dependent on gas imports from the UK, with estimates suggesting the UK will be [responsible](#) for over 90% of gas use. This is a huge potential security risk for Ireland. The 2016 strategy outlines that, to expand access to LNG and storage across Member States, countries will need to undertake the construction of necessary infrastructure, completion of the internal gas market, more efficient use of storage facilities, and stronger cooperation with international partners. Yet, to date, Ireland has neither developed the required infrastructure nor established gas storage facilities (10 years ago).

In a [joint 2018 statement](#) delivered in Washington D.C., then-President of the European Commission Jean-Claude Juncker and then-U.S. President Donald Trump agreed to deepen EU-U.S. strategic cooperation on energy. As part of this, the European Union committed to increasing imports of liquefied natural gas (LNG) from the United States in order to “*diversify and render its energy supply more secure.*” An approach Ireland has failed to adopt.

During the press conference, then-Commissioner for Climate Action and Energy Miguel Arias Cañete reinforced this position, stressing that diversification is a key factor in ensuring the EU's gas security. He welcomed the growing imports of competitively priced U.S. LNG, noting that this comes at a time when Europe's domestic gas production is declining faster than anticipated and coal power plants are being phased out more rapidly.

The press release highlighted that the EU had already co-financed or committed over €638 million to LNG projects, supporting 14 separate infrastructure initiatives.

The [Fourth Report on the State of the Energy Union](#) (2019) highlighted progress since the 2016 strategy, noting that the EU had become a more attractive destination for global LNG and had strengthened energy cooperation with the U.S., leading to nearly 9 billion cubic metres of U.S. LNG imports by March 2019. The EU LNG and Gas Storage Strategy emphasised diversification through multiple suppliers, yet Ireland remained reliant on the UK and the declining Corrib field, without access to the global LNG market.

international outreach focusing on stronger coordination among member states for the joint purchasing of gas ensuring a more effective use of the EU's collective weight. The regulation expands this to industrial consumers who are intensive gas users, enabling them to pool demand.

Article 9 of the regulation also ensures future ready capability with LNG systems operators, ensuring that at least every two years LNG systems operators assess market demand for new investments allowing the use of renewable gas and lower carbon gas, including hydrogen compounds.

The regulation also sets out that From 1 January 2026, the regulatory authority may apply a discount of up to 100 % to capacity-based transmission and distribution tariffs at entry points from, and exit points to, underground natural gas storage facilities and at entry points from LNG facilities for the purpose of increasing security of supply.

A major impact to Ireland will be ENTSOG (European Network of Transmission System Operators for Gas), carrying out a Union-wide simulation of gas supply and infrastructure disruption scenarios, including scenarios of a prolonged disruption of a single supply source. The simulation shall include the identification and assessment of emergency gas supply corridors and shall also identify which Member States can address identified risks, including in relation to gas storage and LNG as well as scenarios examining the impact of a decrease in gas demand through energy savings or energy efficiency measures. Of course, with Ireland's largely single supply, and lack of gas storage, facilities there is the possibility to get ahead of this potential issue by granting permission for the Shannon LNG. ENTSOG are due to carry out their work by November 2026.

Appendix 2: European Capital Investment in Liquefied Natural Gas

- In October 2024, The [Alexandroupolis](#) LNG terminal, in Greece, began commercial operations. The terminal provides a regasification capacity of 5.5 billion cubic meters per year. The estimated investment of the total project was between €350 million to €450 million.
- In January 2021, the LNG Hrvatska was inaugurated on the island of Krk, Croatia. In 2022, regasification capacity was extended to 2.9 billion cubic meters per year. Due to capital investment, by August 2025, [capacity of the plant](#) is on track to double to 6.1 billion cubic meters per year.
- In 1987, the [Zeebrugge](#) LNG terminal began operations in Belgium came into operation, by 2025, due to various upgrades, the annual capacity was increased to 9 billion cubic metres per year with upgrading of facilities expected to completed in 2026.
- The Mukran LNG, Germany terminal was complete to ensure long-term supply of LNG to replace the existing Lubmin FSRU – annual capacity is estimated to be 10 billion cubic metres.
- The Adriatic LNG Terminal, Italy has a maximum regasification capacity of 9.6 billion cubic metres of LNG per year. Overall, the terminal supplies about 14% of [national consumption](#) of natural gas. The terminal began commercial operations in 2009.
- The Sines LNG Terminal, Portugal began operations in 2006. The vast majority of National Gas System supply is [delivered](#) through the LNG (98%), with the remaining 2% coming from the interconnection with Spain.
- Barcelona and Huelva LNG terminals in Spain have been expanded over the last number of years to accommodate increased LNG imports, to offset supply disruptions caused by the conflict in Ukraine. The Barcelon LNG terminal, began operations in 1969 and is the oldest LNG regasification terminal in Spain. The Huelva LNG terminal began operations in 1988,