

7 July 2023

Dear Minister Ryan,

We write to you with grave concern regarding the Energy Security Review and its inclusion of commercial and state-owned liquefied natural gas (LNG) terminals. We agree with the over [200 elected officials, political parties, environmental organizations, clergy, scholars, health professionals and scientists](#) who have written urging you to continue the government policy banning fracked gas imports via LNG. Furthermore, we request that as part of the security review you direct the Department of Environment, Climate and Communications to include a full risk assessment of an attack or accident at an LNG import terminal and the impacts it can have on the environment and human lives.

The 2022 public consultation as part of the Energy Security Review was written along with an in-depth technical analysis by independent consultants. They recommended against any on-land import terminal and any commercial terminal. In recent months, you [indicated](#) that a commercial and private LNG import terminal should be considered as part of the Energy Security Review. Your reasoning at that time was that, “times have changed since Nord Stream 2 was attacked.” Yet this reasoning is antithetical to its premise. LNG terminals themselves are considered by many leading national security organizations and governments to represent a serious terrorist target and they are even more dangerous than pipelines. The Council on Foreign Relations states in their [report](#) that “pipelines are not as attractive because the flow of gas can quickly be cut off and an explosion easily contained. Terminals make better targets because an attack could result in a massive fire that could potentially kill scores of people.”

We recognise that your spokesperson has since [clarified](#) that any new proposed measures have to comply with “our legally binding climate targets and avoid locking us into long-term fossil fuel infrastructure or allowing the use of fracked gas.” They noted that a commercial LNG facility would not “meet these criteria as it would only expand our use of gas and make us more reliant on such imports”. They also highlighted that, “A commercial facility would also be focused on supplying private customers rather than providing backup storage and security for the Irish people which is the strategic objective of the review.”

We welcome this clarification, but we are concerned that your Department’s analysis may be seriously lacking. Where there is a perceived risk that a foreign actor could conceivably attack existing gas pipelines from Scotland, it is essential that your energy security review equally addresses the potential for an LNG terminal to be attacked. LNG is a dangerous, highly unstable, and explosive substance. Liquefying the gas requires supercooling it to -162 degrees Celsius, when it becomes a bubbling, explosive liquid. If it spills, the liquid can turn into rapidly expanding clouds of vapor capable of flash-freezing human flesh. LNG vapors can become uncontrollable fires that are so hot that [they can burn people up to a mile away](#). Public health officials, doctors, first responders, and community groups warn that LNG poses terrible safety risks.

LNG terminals [have been identified](#) by the United States Congressional Research Service as a potential terrorist target: "Because LNG infrastructure is highly visible and easily identified, it can be vulnerable to terrorist attack." The report continues, "LNG tankers and land-based facilities may be vulnerable to terrorism. Tankers could be physically attacked to destroy their cargo—or commandeered for use as weapons against coastal targets. Land-based LNG facilities could also be physically attacked with explosives or through other means. Alternatively, computer control systems could be "cyber-attacked," or both physical and cyber attack could happen at the same time."

In New York State, a proposed LNG import terminal was [rejected](#) by the Governor in part because of the security risks it posed. Further, a risk assessment on a proposed LNG terminal in Providence, Rhode Island found security risks were a serious threat and "concluded that a successful terrorist attack on a tanker could result in as many as 8,000 deaths and upwards of 20,000 injuries."

At the recent May 30th Oireachtas Committee on Environment and Climate Action on "Liquefied Natural Gas and Oil Prospecting", expert witness Professor Barry McMullin, Faculty of Engineering and Computing at Dublin City University, [stated](#), "In terms of geopolitical risk, any geopolitical actor that has both the means and interest in attacking the gas connection infrastructure between Ireland and the UK, by definition, has the means and interest to attack LNG import infrastructure. Therefore, LNG import infrastructure does not actually mitigate that geopolitical risk."

Currently there is only one corporation - New Fortress Energy - seeking approval to construct a commercial LNG import terminal in the Shannon Estuary at the base of the Mother River of Ireland. This estuary is specifically designated by the European Union as a Special Conservation Area because of its high ecological value. If this terminal were constructed, the blast zone would include up to a mile, causing irreparable harm to the environment and nearby communities.

In the company's own financial disclosures, New Fortress Energy [states](#) that, "Operation of our infrastructure, facilities and vessels involve significant risk...accidents, fires, explosions or other events or catastrophes... pollution, release of or exposure to toxic substances, or environmental contamination affecting operation."

Minister Ryan, given that you have raised concerns about an attack on a gas pipeline, this same logic should be applied to LNG, and the Department must equally assess the impact of an attack against an LNG terminal or tanker, which you have now included as a way to address a potential attack on pipelines.

It is imperative that the Energy Security Review include a risk assessment on LNG terminals that addresses the multiple methods by which an LNG tanker delivering gas to an LNG import terminal could also be attacked, as [outlined](#) by the Council of Foreign Relations including

ramming the LNG tanker, using explosives in the path of the tanker, detonating explosives alongside a tanker, and hijacking a tanker with the potential of sailing it into a population center.

We also request that you direct the Department to include in its risk assessment what emergency equipment and training first responders would need to respond to such a disaster. It is important to know if any emergency personnel in Ireland have the capacity to conduct an operation to handle LNG incidents given that the extreme temperatures at which LNG fires burn pose unique and difficult challenges including the distance that they can impact since they can cause burns up to a mile away. If an attack or accident happened at the proposed New Fortress Energy's Shannon LNG terminal, it could burn the land, people, livestock and houses in both counties Kerry and Clare.

Going into government as the Green Party leader, you promised to stop the import of fracked gas via LNG import terminals, including Shannon LNG. Then in 2021, you [stated](#) that "I wish to make it very clear that the permitting of this project would be in direct contravention to Government policy and therefore it should not, under any circumstances, be permitted." We sincerely hope that you do not break this promise to your party and the people of Ireland now to enable dangerous and highly explosive LNG. We request that you, as Minister of the Department of Environment, Climate and Communications, direct the Department to include a full risk assessment of an attack or accident at an LNG import terminal, an LNG spill on water, and the impacts it can have on the environment and human lives as well as the ability for first responders to respond to an LNG terminal disaster.

Sincerely,

Better Path Coalition
Karen Feridun
Co-founder

Breathe Easy Susquehanna County
Rebecca Roter
Chairperson

Catskill Mountainkeeper
Wes Gillingham
Associate Director

Comhlámh
Caroline Murphy
CEO

Common Ground Rising
Elaine Cimino
Director

Concerned Health Professionals of Pennsylvania
Barbara W. Brandom, MD
Steering Committee Member

Damascus Citizens for Sustainability
Barbara Arrindell
Director

Delaware Riverkeeper Network
Tracy Carluccio
Deputy Director

Extinction Rebellion Ireland
Angela Deegan
Volunteer

Food & Water Action Europe
Enrico Donda
Gas Campaigner

Food & Water Watch
Jim Walsh
Policy Director

For a Better Bayou
James Hiatt
Director

Frack Action
Julia Walsh
Director

Fracking Free Clare
John Higgins
Coordinator

Friends of the Earth
Jerry Mac Eilly
Head of Policy

Future Generations Kerry
Eoghan Harris
Campaigner

Futureproof Clare
Sinead Sheehan
Member

Irish Doctors for the Environment
Derek Cawley
Consultant Member

Kinvara Climate Action
Anna Murphy
Member

Love Letrim
Jamie Murphy
Chairperson

Marcellus Outreach Butler
Michael Bagdes-Canning
Planning Group Member

Mark Ruffalo
Actor & advocate

Move Past Plastic
Tamela Trussell
Founder

New Energy Economy
Mariel Nanasi
Executive Director

New Mexico Climate Justice
Anni Hanna
Director

Not Here Not Anywhere
Britta Thiemt
Volunteer

OPG - Oil and Gas Observatory
Suelita Rocker
Director

Patriots From The Oil & Gas Shales
Craig Stevens
Founder

Pennsylvania Action on Climate
Michael Bagdes-Canning
Coordinating Team Member

People Before Profit Limerick Branch
Laura Fahy
Convenor

Physicians for Social Responsibility New York
Kathleen Nolan, MD
President

Physicians for Social Responsibility Pennsylvania
Tammy Murphy
Advocacy Director

Protect All Children's Environment
Elizabeth O'Nan
Director

Ray Kemble
Resident from Pennsylvania impacted by fracking & former gas worker

Responsible Decarbonization Alliance
Barbara Jarmoska
Director

Safety Before LNG
John McElligott
Member

Sea Shepherd Ireland
Manuel Salazar
Dublin Manager Areas

Shale Must Fall
Melina Sharp
Irish Branch

Sierra Club
Talia Calnek-Sugin
Associate Director

Stand.earth
Hannah Saggau
Senior Climate Finance Campaigner

Sunrise New Orleans
Benjamin Hoffman & Sage Franz
Campaign Managers

Third Space Galway
Martina Finn
Curator

Veterans for Climate Justice
Colleen Boland
Founder

Wall of Women
Paddy McClelland
Co-founder

Watchdogs of Southeastern PA
Chris DiGiulio
Co-founder

XR Kerry
Luke Eastwood
Member