

ALL IRELAND NETWORK

Against Onshore Oil and Gas Extraction

17th January 2022

Dear MLA,

The rapidly growing network against onshore gas extraction are strongly opposed to plans to start a new oil and gas industry as outlined in the new NI Energy Strategy. Evidence shows that Blue Hydrogen made from a new gas industry in NI will cause 20% higher emissions than our current gas or even a coal-based plan, it will plunge homes on the gas network into deeper fuel poverty, devastate our sustainable tourism and agriculture resulting in negative economic impacts, and bring very serious negative harmful health, climate and human rights impacts, locally and globally.

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When [Minister Lyons launched his energy strategy](#), the press image was of Minister Lyons standing holding up the report against a backdrop of solar panels. It looked good. There are some good ideas for genuine renewable energy in the strategy. But the reality of the strategy would have been better illustrated by Minister Lyons standing in front of fracking rigs with Methane pumping out, lorry loads of chemicals and a landscape permanently scarred and polluted with 1000s of wells and people living in fuel poverty.

This is a strategy written by and for the gas industry interests not the public interests.

The community in NI are vulnerable not just because of the post conflict past, the high rate of PTSD, and mental health issues and the longest hospital waiting lists in Europe, the threats of a border poll and Brexit bringing the troubles back, but also because we are the only part of the UK and Ireland without an effective fracking ban and this puts our health, clean air and water, our tourism and agriculture industries at risk. Instead we have a Dept for Economy ignoring all the climate, health, human rights and blue hydrogen evidence, ignoring all the evidence on fuel poverty and the need for affordable heating, ignoring the recommendations of the Exeter Uni report on Governance, facilitating the gas industry's influence, refusing to suspend its statutory duty to promote gas, and refusing to repeal its 1964 Petroleum Act. Instead, it plans to ignore the no more fossil fuel exploration and no more fossil fuel

subsidies advice from the UN secretary general's Code Red for Humanity call and create an energy strategy for the industry rather than for the community. In this document we lay out the evidence and conclude with three urgent actions we need MLAs to take to act in the Public Interest and halt this industry plan.

We all knew what to expect from the Energy Strategy because the [University of Exeter report](#) from March last year told us that private industry was in control in the Dept for Economy, and they refused to end their statutory duty to promote gas, and put in place appropriate governance needed to make a good transition to a renewable future.

But the energy strategy surpassed our expectations! Almost a mirror image of the [Firmus plans for hydrogen](#) but more. In this Firmus [energy youtube video](#) they talk about making a greener sustainable energy mix for NI by using hydrogen. They talk about working with the Dept for Economy and the utility regulator. In the Foreword from the [Chairman in the Firmus Energy Stakeholders Report](#) he talks about renewable gas and reversing the pipeline from Scotland to NI so NI is supplying the UK with renewable gas. He says failure to do so will have a negative impact on Northern Ireland PLC being able to **benefit from indigenous gas to decarbonise**... firmus gas will do all it can to assist the Utility Regulator achieve local renewable gas tariffs in the future.

Across Europe the blue [Hydrogen lobby in the fossil fuel industry](#) has been busy, but experts agree it's just a trojan horse to trap us into fossil fuels forever.

1. Key Extracts from the new NI [Energy Strategy Documents](#) (**Bold font and underlines are our marking of key text**)

(It [was launched](#) on the 16th of December 2021 the last day the executive met before Christmas holidays)

Wealth Creation

"Northern Ireland imported approximately £2.8bn of fossil fuels in 2020 alone. The Energy Strategy will lead to **more of this money staying in Northern Ireland, creating local wealth and jobs through using our own natural resources** and moving away from funding other countries that sell us fossil fuels. There will be added economic benefit by providing grown opportunities for local companies in new low carbon external markets.

Energy Security

The largest global oil producers are United States, Russia, Saudi Arabia, Canada, and Iraq with 80% of the world's oil reserves in OPEC member countries. The **largest gas** producers are the United States, Russia, Iran and China. The Energy strategy for Northern Ireland becoming more **self-sufficient in generating and supplying its own energy** reducing our reliance on others.

Under Key Policies

Create a hydrogen centre of excellence in research and innovation

Hydrogen is a substantial opportunity for Northern Ireland. We can attract investment into the local economy and position our companies to take advantage of the energy and economic opportunities available on a global scale.

Hydrogen proposition for Northern Ireland

Industry and Power “we **can trial** synthetic fuels and carbon capture technologies in carbon intensive activities to produce blue hydrogen.

Gas Network

We can take advantage of the ***modern gas network which has the potential to be hydrogen ready with less investment than older gas networks elsewhere.***

We have a world leading research centre (HySAFER) in Hydrogen safety which will be important to successful hydrogen deployment around the world.

“Replace ***high carbon fossil fuel heating sources with lower and zero carbon sources in homes and businesses***”

Heat pumps will take advantage of our substantial and growing renewable electricity resources. However we also intent to utilise our ***modern gas infrastructure and the potential to generate and import zero carbon gases.*** We will continue to engage with gas network operators on replacing natural gas with renewable gas.

The new energy system will be based around infrastructure and assets rather than commodities. Reducing the costs associated with purchasing fossil fuels will require additional upfront investment but unlike our current system will leave us with ***assets that give us ongoing benefits***, both in generating clean energy and growing the local economy.

The low carbon and renewable energy sector already generates around £1.06bn in turnover annually and provides 5300 full time equivalent jobs. ***We aim to at least double*** the size of this sector by ***generating local market opportunities in place of importing fossil fuels,*** and by ensuring our ***companies*** can compete for the substantial UK and global opportunity in low carbon energy and technologies that are already becoming available.

Phase out fossil fuel home heating oil

We cannot achieve our vision of net zero carbon energy without phasing out fossil fuel heating oil for around 68% of homes and businesses that still use it. We recognise that this will have a significant impact on many people and particularly on those in rural areas which tend to be off the gas grid and where there are currently limited alternatives. The timelines and processes for the transition will require detailed planning to support consumers. Liquid fuel boilers may be able to convert to sustainable ***lower carbon fuels*** in the future; however, more research is required to understand the effective and ***affordable*** use of these fuels in NI.

There are a number of potential transition pathways available to consumers currently using heating oil. These include a switch to zero carbon heating technologies such as a heat pump or connection to the gas network (where possible) to take advantage of ***the plan to fully decarbonise the gas used in the network.*** A range of hybrid options may be available for

example connection to the gas network and installation of a hybrid heat pump which, will still requiring decarbonised gas, would see primary demand met by electric heat pumps. Another alternative could include transitioning to a heat pump with an **option to use sustainable low carbon liquid fuels** to meet high heat demand. The transition pathway will be explored in more detail in our Decarbonising Heat consultation.

Heat pumps will take advantage of our sustainable and growing renewable electricity resources. However, we also intend to **utilise our modern gas infrastructure and the potential to generate and import zero carbon gases**. We will continue to **engage with gas network operators on replacing natural gas with renewable gas**.

The limited extent of the gas network means that not all customers are able to connect to it and it is not economic or viable to extend the network to all homes. However as natural gas has lower emissions than oil we will continue to **encourage people with access to the gas network to connect to it**. This policy will also be considered further in the planned Decarbonising heat consultation. We recognise that connected use of natural gas is as an interim solution in meeting our longer term objectives of ensuring that energy for heating does not contain fossil fuels.

Q65 DO YOU BELIEVE THAT OUR APPROACH TO PETROLEUM LICENSING SHOULD CHANGE IN LINE WITH OUR COMMITMENT TO DECARBONISE ENERGY?

WHAT DID RESPONDENTS SAY?

In total 115 of 253 responses were received to this question in Citizen Space.

Within the policy options consultation document, we stated that the future policy decisions around petroleum should be taken with the full understanding of the issues. These include the positive and negative economic benefits as well as impacts on environment and society.

There was broad overall support for the proposal, with 86% of respondents who answered this question agreeing that our approach to petroleum licensing should change in line with our commitment to decarbonise energy.

Most of the respondents described themselves as domestic consumers **or energy sector representatives**, 46% and **30% respectively**. There was an even representation from rural and urban dwellers.

Only a small number of written comments were received; however the majority of these called for petroleum licensing to be banned in NI. Respondents were largely of the opinion that continuing to support petroleum extraction would be wholly inconsistent with net zero commitments and the Energy Strategy's general direction of travel to move away from high carbon emitting fossil fuel and towards renewable, low carbon energy sources. In addition, some respondents noted the potential negative impacts on the environment and society in supporting a change in approach to petroleum licensing.

END OF EXTRACTS FROM NI ENERGY STRATEGY

2. Hatch on ECONOMIC IMPACTS OF FRACKING IN NI

The [\(leaked\) Hatch](#) Report [commissioned by the Dept for Economy](#) and submitted to them 2021 whilst lacking many vital things including fundamental Public Health Impact Assessment was clear that **job numbers** created by a new fracking industry here would range from **110 to 115**.

The researchers commissioned to consider the economic, environmental and societal impacts went on to say that;

NI is **unlikely** to achieve the economies of scale and low costs of production **which would provide a major benefit from lower energy prices**. There is the scope for further downstream economic benefits, although these are unlikely to provide a major driver for additional sector growth or attraction of major inward investors into NI.

In the context of the size of the NI economy as well as its energy sector, the scale of potential **GVA and employment impacts are shown to be relatively low**, even under the high development scenario.

The Nature of the Northern Ireland economy and its infrastructure **would limit the scope to secure both upstream and downstream economic benefits** from the future of oil and gas development.

END OF EXTRACTS FROM HATCH REPORT.

So it is clear that the claims of the wealth and jobs creation from starting a new oil and gas industry in NI to make renewable gas are not true. It is also clear that it will not result in cheaper gas.

Independent expert reports commissioned by the community assessed the economic impacts of a new fracking industry in NI and concluded that the industry would bring long term losses because it would result in permanent damage to our sustainable tourism and agriculture industries. This energy strategy does not consider the cost of producing what it calls renewable gas but it will add two major extravagant expensive processes onto the cost of gas making blue hydrogen and carbon capture and storage. This will make home heating extremely expensive.

3. EMISSIONS 20% Worse than Gas or Coal!

Blue Hydrogen is made from fossil gas. Independent peer reviewed studies have shown that it creates emissions 20% higher than gas itself.

[NI Future Energy Decarbonisation Scenario Report 2020](#) is forecasting

NI's Final Fuel Mix by 2050 as (Fig 4.11)

Biofuels = 10 to 20% (biogas from AD converted to Electricity) (option for biogas to inject into gas grid)

Hydrogen = 15-30%

Natural Gas = 10-15%

NI's source of Hydrogen by 2050 as

Biomass Gasification = (Biogas from AD converted to Hydrogen)

Natural Gas = 60%

Green Hydrogen = 15% (Wind and Solar)

The forecasted final fuel mix shows Biofuels increasing from 5% in 2018 to 20% by 2050

Hydrogen increasing from 0 to 31% and Natural Gas increasing from 10% to 15%.

Biofuels include hydrogenated vegetable oil, wood, biomass, bio- liquefied petroleum gas and biofuel blends.

4.27 notes that Hydrogen and Green Gas replaces Natural Gas by 2050. However, Figure 4.38 shows Natural Gas still generating 3.6 to 4GWh by 2050

It is clear that the Dept for Economy plan is to lock us into propping up the gas industry forever by digging us deeper into funding their assets and keeping us depending on natural gas and making hydrogen right up to 2050.

There are many reports on the facts and science of Blue Hydrogen often they refer to it as [scams, tricks and cons of the fossil fuel industry](#). They all consistently show two things that;

1. The emissions are higher than fossil gas itself
2. The processes added to the fossil gas make home heating extremely expensive.

Making blue hydrogen from fossil gas is worse for the environment and creates more expensive home heating.

4. FUEL POVERTY Lock in for Generations

NO ONE CAN AFFORD THE NI ENERGY STRATEGY PLAN FOR BLUE HYDROGEN PUMPED INTO GAS NETWORK

Fuel Poverty is a major issue in NI. Children live in fuel poverty in NI. This is a very serious situation. National Energy Action produced a report in 2021 called [Every Home should be a Warm Home](#). It raised fears that heating homes by Hydrogen could make heating expensive. It refers to a report by [The International Council on Clean transportation](#) which [showed that heat pumps were cheaper](#) way to run heating in a home.

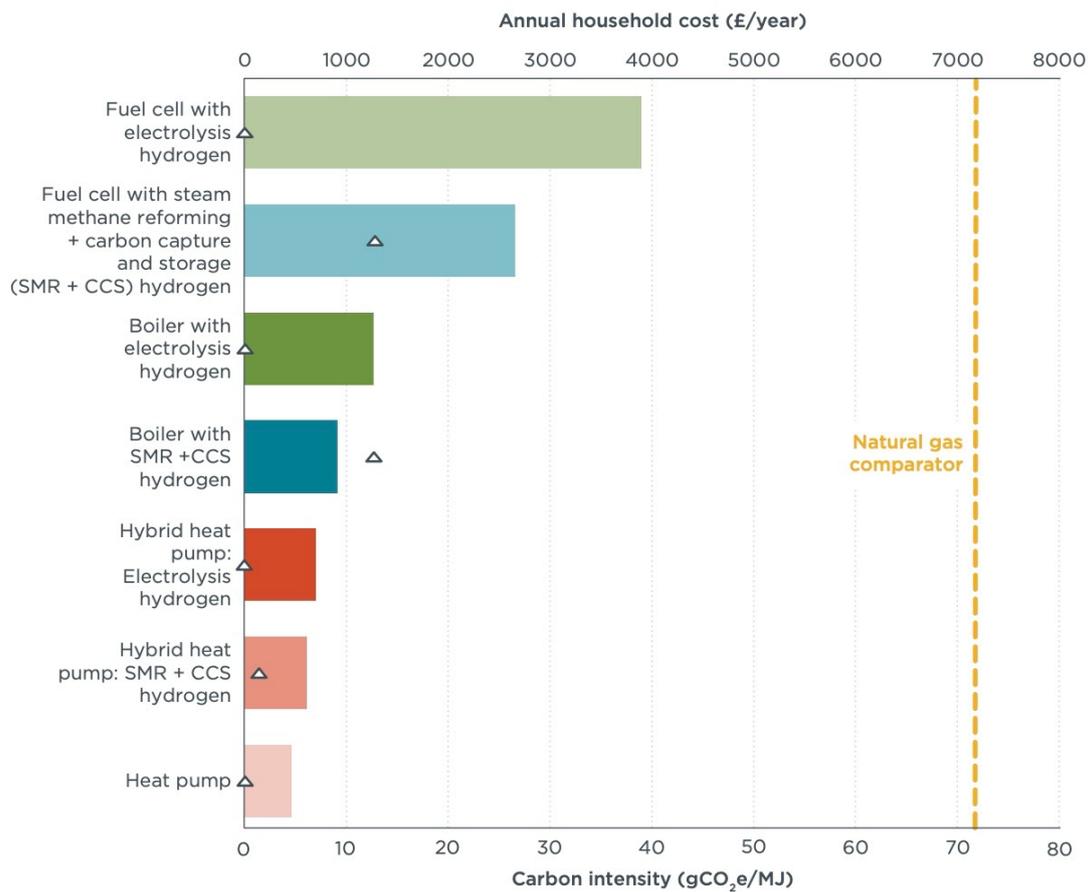


Figure ES1: Cost comparison and carbon intensities of different technology options for heating a typical UK single-family house for one year in 2050. Triangles represent the median values for the carbon intensity of each pathway along with a natural gas comparator.

Again, this shows the prime interest of the Dept for Economy is to support the oil and gas industry and the gas companies who are clearly a heavy influence in the Dept. and not the community. It is therefore urgent that MLAs look at the true evidence and protect the community from their plans. We must avoid RHI round two where all the evidence and alarm bells rang but were ignored.

5. REAL PEER REVIEWED EVIDENCE (LOOK UP!)

On top of the environmental impacts of the process of making Blue Hydrogen and Carbon Capture there is well established peer reviewed evidence:

1. [Medical Evidence](#) brought to us by Concerned health professionals based on over 2000 peer reviewed studies. It shows our (post conflict, highest rate of PTSD and medication for mental health issues, deeply segregated community) would suffer major trauma, with increases in cancer, respiratory disease, birth abnormalities as our air and water are poisoned.

2. [Climate Evidence](#) brought to us by the UN Secretary General who announced a code red for humanity and said:

“The alarm bells are deafening, and the evidence is irrefutable: greenhouse-gas emissions from fossil-fuel burning are choking our planet and putting billions of people at immediate risk”

“Global heating is affecting every region on Earth, with many of the changes becoming irreversible. Countries should also end all new fossil fuel exploration and production, and shift fossil-fuel subsidies into renewable energy”.

3. [Human Rights Evidence](#) The Irish Centre for Human Rights report showed that the plans in the NI energy strategy to start a fracking industry to produce gas to make blue hydrogen would result in violations of our rights to; life, health, water, food, housing, access to information, public participation, clean safe health and sustainable environment.

We should not even attempt to justify starting a new onshore oil and gas industry in NI.

We would be better to simply continue with the fossil gas network that we have now than start fracking and pump blue hydrogen into gas pipelines. A do-nothing option for energy in NI would be better than the plans in the Energy Strategy. What we need is to follow the direction of UN and move to renewables now. We dump £100 million of renewable energy every year – we need to harness that, not lock in to propping up the fossil fuel industry forever.

The only benefits of the Energy Strategy are to the fossil fuel industry whom the Exeter report shows have ‘a direct line’ into the formation of policy etc in the Dept for Economy.

This energy strategy is simply in the interests of the oil and gas industry not in the interests of the public.

The fact is that the public and community do not consent to a new fracking industry starting in NI and this is illustrated by the responses to the public consultation on the petroleum licences. Two petroleum licences have been accepted by and validated by the Dept for

Economy. If Ministers in the NI Executive, make a policy that allows licensing they will be granted, and the drilling and fracking industry will become unstoppable.

[PLA1/16 Licence area](#) is all around Lough Neagh in NI from Belfast down to Armagh, across to Dungannon and up to Antrim. Fracking here will put Belfast's drinking water at risk.

[PLA2/16 Licence area](#) covers a large part of Fermanagh including the the World Geopark site and the views across a stunning landscape seen from the [Stairway to Heaven](#) the Lough Erne waterway runs the length of the fracking licence area and joins into the aquifers in the Shannon pot the source of the river Shannon.

Fracking destroys tourism and [farming](#).

So why would the Dept for Economy facilitate the gas industry now?

The rest of the world is trying to move away from fossil fuels. In the UK gas networks are being decommissioned, soon gas boilers will no longer be on sale. In London the Climate Change Committee echoed the Irish EPA that NI should not prop up assets of the fossil fuel industry by locking us into fossil fuels through investment in fossil fuel infrastructure. However, in NI the Dept for Economy is locked into a statutory duty to promote the gas industry and the industry are in control of that Dept as illustrated by the Uni Exeter report. The Gas to the West pipeline was built and it has a commitment to get another 40 thousand homes connected to the gas network. The Dept does not want to stop. Industry is in control, and they want to make profits. Several from that Dept including the [Utility regulator](#) moved to work for the gas industry.

The UK has a hydrogen strategy however at one time England thought that fracking was a good idea until it ended with earthquakes. Experts pushed back at the time of fracking and [the same is happening now as experts reveal the truth](#) about blue hydrogen as a dirty fuel. That plan is out of date and out of step from the evidence. New evidence has now emerged in 2021 that cannot be ignored.

Northern Ireland's energy strategy is ignoring the damning evidence from [peer reviewed reports on Blue Hydrogen](#)

The calculation method is rigorous, the assumptions are all solid and the results are stark. "Blue hydrogen cannot be considered 'low-carbon' or a 'clean' solution. In fact, this paper shows that producing blue hydrogen is significantly worse than burning fossil fuels for heat, such as gas or coal, in the first place."

Cebon added: "Politicians must take notice of this important finding before considering investment in blue hydrogen under the premise that it supports our climate goals. The only hydrogen we can consider truly emissions-free, is that made from renewable energy such as green hydrogen."

MLAs cannot ignore the evidence on Blue Hydrogen that was in place before the NI energy strategy was released. Just as they cannot ignore the plans in the Energy Strategy to start a new oil and gas industry in NI and all of the Health, Climate, and Human Rights evidence against that.

The community in NI are vulnerable not just because of the post conflict past, the high rate of PTSD, and mental health issues and the longest hospital waiting lists in Europe, the threats of a border poll and Brexit bringing the troubles back, but also because we are the only part of the UK and Ireland without an effective fracking ban. Instead, we have a Dept for Economy ignoring all the climate, health, human rights and blue hydrogen evidence, ignoring the recommendations of the Exeter Uni report on Governance, facilitating the gas industry's influence, refusing to suspend its statutory duty to promote gas, and refusing to repeal its 1964 Petroleum Act. Instead, it plans to ignore the no more fossil fuel exploration and no more fossil fuel subsidies advice from the UN secretary general's Code Red for Humanity call and create an energy strategy for the industry rather than for the community.

6. MLAs URGENT KEY ACTIONS

We need the following action now to ensure our elected representatives are acting in the public interest.

MLAs must:

1. Make a statement condemning the energy strategy plans to start a new oil and gas industry in NI to feed a Blue Hydrogen industry that will make higher emissions than gas itself and create extremely expensive home heating plans that will lock us into fossil fuels and fuel poverty forever.
2. Safeguard the community, environment, our health and human rights, our tourism and farming by ensuring that the new policy review on Petroleum Licensing being brought to the executive any time now is to Ban Petroleum Licensing. That ban should be the only option going out to public consultation.
3. Seize the opportunity to amend the Climate Bills to ensure that both will bring a ban on Petroleum Licensing in line with the assembly motion. Methane is the worst climate offender and exactly what the IPCC said to stop exploring for and subsidising.

The peer reviewed evidence is there. We are asking that it is not ignored. We are watching carefully which parties will respond and act and which parties will ignore.

The NI Assembly election in May 2022 is vital. We simply cannot afford to elect MLAs who will serve the interests of private shareholders instead of the interests of our community.

If we cannot see real action on the three demands above, we will have no choice but to bring a wide network of all groups concerned with the risks to environment, tourism, farming, climate change, poverty and human rights together and agree to vote for only candidates that are acting and will act in our interests and against the interests of the fossil fuel companies. If they are not available, we have a core group within this network who will raise funds to run

candidates on common community interests. We have already established structures to facilitate this.

We expect a response by return on your party's commitment to the three key urgent actions above and your assurances to act now.

On Behalf of:

Operation Grounded Network

Progressive Politics NI

Farmers for Action NI

Youth Climate Action NI

Fermanagh Fracking Awareness Network

Belcoo Frack Free

Letterbreen and Mullaghduin Partnership

Love Leitrim

Safety Before LNG

The Organic Centre Rossinver

Kinvara Climate Action

Galway One Future

Futureproof Clare

North Leitrim Sustainable Energy Community

Save Slieve Dough Mountain Group

Frack Action New York

(More groups are consulting on this submission, this list will grow over coming days)

7. APPENDIX

Some facts on Blue Hydrogen from Friends of the Earth UK

BLUE HYDROGEN

Distillation of Seawater:

- 20 T of Seawater to make 1 T of Hydrogen
- 10 T of Brine & Toxic chemicals discharged back into sea
- 100kWh to 520kWh of electric to distil 20 T of Seawater

BLUE HYDROGEN Steam Methane Reforming:

- 9.3kg of CO₂ released by creating 1kg Hydrogen from Natural Gas (Methane)
- Fugitive emissions of Methane, Nitrous Oxides and Carbon Monoxide
- GHG Footprint of Blue Hydrogen is 20% greater than burning Natural Gas or Coal
- Methane has 84 to 86 TIMES (=8,400 to 8,600%) more global warming potential than that of carbon dioxide.
- Wastewater discharges from Steam Methane Reforming
- Increasing Natural Gas production
- Fugitive emissions from Natural Gas extraction & storage
- Fracking creates leaks of Methane

BLUE HYDROGEN

Carbon Capture & Storage:

- CCS rates from only 65 to 90%, not capable of Zero Emissions
- CO₂ & Methane fugitive emissions from CCS
- CO₂ leaks from Subsurface Carbon Stores
- CCS used to extract more Fossil Fuel with Enhanced Oil Recovery
- Unproven efficiency at scale
- No Regulatory Standards for Hydrogen production from Methane & CCS