

23rd November,

2015

To: alternativefuels@dtas.ie

Department of Energy, Communications and Natural Resources
29 Adelaide Road,
Dublin 2.

RE: Alternative Fuels Infrastructure Public Consultation

Dear Sir / Madam,

Ireland's implementation of EU Directive 2014/94/EU needs to be integrated with a wider greenhouse gas mitigation and sustainable transport strategy, as part of the Low Carbon Roadmap to 2050.

In considering the implementation of this Directive an assessment is required of the sustainability, viability and desirability of utilising Compressed Natural Gas (CNG) and Liquefied Natural Gas (LNG) as a transport fuel source.

We wish to submit formally and to be considered by the Department as a part of our submission to this consultation, a major report on the sustainability of CNG and LNG as an alternative to liquid petroleum based transport fuel, published by the Europe-wide research organisation Transport and the Environment (T&E) earlier this year:

Please see the following link:

<http://www.transportenvironment.org/publications/te-responses-consultation-eu-strategy-ling-and-gas-storage>

In July 2015 the European Commission opened a public consultation on an EU strategy for liquefied natural gas and gas storage. In its response T&E state that natural gas cannot deliver the decarbonisation that the sector needs to achieve the EU climate goals up to 2050.

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Directors: J Harnett, J Leahy, M Mehigan, D Murphy, B Rickwood (UK), C Stanley Smith (UK), A Uí Bhroin, B McMullin, P Maguire, J Sweeney, G Conroy

Its findings were that investing in CNG and LNG technology would divert necessary resources from truly low-carbon alternatives in the transport sector and would create lock-in effects, and concluded that:

“Public resources for energy transition in transport should go where it offers the greatest public benefits, improved efficiency, and sustainable electrification”

We also attach for consideration a document by CEF (Conserve Energy Europe) on the advantages and disadvantages of a switch to natural gas.

<http://www.conserve-energy-future.com/advantages-and-disadvantages-of-natural-gas.php>

Natural Gas would continue to generate significant emissions, the level of methane leakage is not adequately projected, a switch to transport fuel gas would create lock-in investment to fossil fuel technology and reinforce continued unsustainable gas demand, including reinforcing arguments for accommodating fracking. Furthermore the potential available of alternative biogas is both limited and problematic in actual emission impact.

DCENR as the lead Department on energy needs to take more effective action with DoECLG and Department of Transport on the implementation of sustainable transport measures in Ireland

Ireland is currently facilitating an increase in already unsustainable levels of car dependence, and has allowed the modal share of rail freight to decline for over 20 years.

The response needs to be an integrated transport strategy focusing on the most progressive achievement of greenhouse gas reduction with the following key points in mind:

Efficiency, demand management, modal shift from car to public transport and cycling, the adoption of land use policies that do not increase transport demand, maximisation of rail system for passengers and freight, sustainable electrification of both rail vehicles and rail system with supply from renewable sourcing, and the most progressive achievable air pollution reduction standards.

There has been an overarching policy failure to implement the 2009 Department of Transport “[Smarter Travel - A New Transport Policy for Ireland 2009 -2020](#)”. This included targets to ensure that by 2020 the total kilometres travelled by the national car fleet would not exceed 2009 levels and workplace single car commuter travel would be reduced to 45% with the parallel National Cycling Strategy having a 10% target for all journeys.

Any consideration of providing alternative fuel infrastructure needs to part of a wider sustainability assessment.

The consultation document is disappointing in its consideration of sustainability. There is inadequate consideration of the implication of increasing CNG and LNG use and potential level and source the increased renewable power capacity required for electrified transport.

An effective national transport policy needs to achieve radical reduction in carbon emissions beyond 2030 when the Carbon Budget will greatly restrict any emission capacity for transport

The key questions which need to be asked in this consultation regard the sustainability of LNG and CNG , including any potential biogas content in meeting post 2030 Carbon Budget targets.

For instance:

- Would switching to CNG and LNG fuel be sustainable in emissions reduction?
- Is increasing CNG and LNG the most sustainable means of reducing transport emissions beyond 2030, having regard to level of decarbonisation needed by 2050?
- Would CNG and LNG fuel switching reinforce undesirable drilling demand within the EU and continued market imports?
- Will the effect of this proposal create lock in to an new fossil fuel technology promoting demand for fracking in the EU and further unsustainable gas import for outside the EU from countries that should be reducing their own emission footprint,
- Would CNG and LNG fuel switching be counterproductive if the rise in transport is not reversed through 'Smarter Travel' measures?
- Is the effectiveness of introducing alternative fuels nullified if transport demand and the resource consumption of the manufacture of transport vehicles and emissions are allowed to rise, as is occurring, through failure to implement Smarter Travel 2009, thus cancelling any carbon reduction gain ?
- Would CNG and LNG fuel switching perpetuate inefficient and outmoded motor combustion technology?
- Does promoting CLG and LNG, promote and the continuing unsustainable use of fossil fuel based vehicles and disincentives alternatives such as electric and fuel cell?

Yours sincerely,

Ian Lumley
Heritage Officer

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