



The Scottish Parliament
Pàrlamaid na h-Alba



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Member of the Scottish Parliament for Rutherglen Constituency

Paul Wheelhouse MSP
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The Scottish Government
St. Andrew's House
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Dear Paul,

I have recently been contacted by Cambuslang Community Council in my constituency who have outlined several concerns about fracking which I attach to this letter.

The concerns were raised in response to the consultation on the Scottish Government's preferred policy provision on unconventional oil and gas (UOG), the Strategic Environmental Assessment (SEA), and partial Business and Regulatory Impact Assessment (BRIA), which ran from 23rd October to 18th December 2018.

Unfortunately, due to the cycle of Community Council meetings the responses were not completed in time for submission to the consultation by the 18th December deadline.

I would be grateful, therefore, if you could note and give your fullest consideration to the attached thoughts and conclusions on the consultation from Cambuslang Community Council when deliberating on the aforementioned preferred policy provision on unconventional oil and gas.

Kind regards,



Clare Haughey MSP
Rutherglen Constituency

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Cambuslang Community Council response to Scottish Government consultation on UOG

1. There is little experience of the implications of permitting fracking activity in UK conditions. It would make sense to wait until the English trial has been operational for a few years, and a comprehensive study is produced on the experience with recommendations based on that. CCC believes that there is no strategic imperative to exploit this potential resource sooner rather than later. The argument by prospective developers that Scotland 'should get in on the ground floor' to develop internationally marketable expertise in this technology seems somewhat fanciful.
2. Several of the reports commissioned by SG mention the need for "tight regulation". As yet, it is not clear what level of 'tightness' would be necessary. This is another argument for a 'wait and see' approach.
3. The KPMG report focuses on economic benefits, yet these work out at a cost-per-job of £857k! On the 'pro' side, it is suggested that local production could impact positively on the fuel poverty problem which affects around 27% of the population, rising to 41% among the elderly. For this to have a chance of happening, it would be necessary for SG to articulate and implement a policy which clearly ensures that those in most need will benefit preferentially.
4. Climate change report. This is full of ifs and buts. However, SG's Environmental Report states that: "the addition of an onshore unconventional oil and gas industry would not promote Scotland's ability to meet the established greenhouse gas emissions targets and objectives in relation to protecting and enhancing the environment." Assuming this is correct, it is difficult to argue the case for fracking; our whole energy policy should be geared towards reducing emissions. Therefore, in terms of meeting target greenhouse gas emissions, SG would have to guarantee that production of the various fracking products in Scotland would replace importation and not be in addition. This would neutralise this particular aspect of the argument.
5. British Geological Survey report. There is a need for more seismic monitoring to get a better understanding, despite assurances that tremors associated with fracking are almost undetectable and below the level of natural seismic activity in UK. Therefore 'wait and see'.
6. Health impact report. There is inadequate understanding of health impacts. It is argued that public exposure to risk will be very small, but more research is needed on occupational exposure of fracking operatives. Therefore 'wait and see'.
7. Community impacts report by Ricardo. It is conceded that "local communities would nevertheless experience an increase in traffic numbers, potentially for a number of years." However, the effects are downplayed in report. Again, actual data from English experience eventually will be helpful.
8. The RSE paper states: "It is important that, in coming to a decision over Scotland's gas future, the public is correctly informed and given a genuine opportunity to contribute to the decision-making process. The choice should not be imposed on the public from above, nor should it be left to communities to decide whether they wish to host onshore developments on a case by case basis." This is contentious, and it is difficult to see how these requirements can be reconciled. On the one hand, it is arguably the role and duty of Government to decide on

exploitation and use of strategic resources, such as energy, with the greater good in mind. On the other hand, the SG reports refer to implications for local soil, water and air quality; and other reports refer to traffic implications. It can be argued that these kind of impacts can only be judged on a case-by-case basis. If a community accepts the impacts - perhaps with financial compensation - then fine. Whatever the situation, communities should always have an important role in making decisions that affect their locality. This is the most important issue for us: communities should not just be consulted, but have a major say in whether fracking is undertaken in their area or not.

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