

Response ID ANON-WDST-KWPP-4

Submitted to **Talking "Fracking": A Consultation on Unconventional Oil and Gas**

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Community Considerations

1 What are your views on the potential social, community and health impacts of an unconventional oil and gas industry in Scotland?

What are your views on the potential social, community and health impacts of an unconventional oil and gas industry in Scotland?:

We welcome the introductory comment that, "The Scottish Government's position is to take a cautious, evidence-led approach." However, we note that the evidence in relation to health impacts is considered "inadequate". We would therefore urge the government to seek better health data before deciding to proceed with any unconventional oil or gas exploration.

The report on Understanding and Mitigating Community Impacts from Transport (<http://www.gov.scot/Publications/2016/11/5865/0>) is very thorough. We note that in terms of current traffic levels, the increase in vehicle movements would be insignificant. However, where well pads may be sited near small or remote communities, we would be concerned that the additional HGV traffic in areas where they currently do not operate will have a significant impact on the quality of life and well-being of the local residents.

This may particularly be the case in areas populated by families with young children, which could lead to children being kept indoors. This would counteract the moves by Scottish Government to encourage more active lifestyles to combat childhood obesity and other related conditions. Older people in these communities may also be more reluctant to venture out, leading to increasing isolation.

Whilst these effects are not easy to quantify, they will be significant for the people affected.

2 What are your views on the community benefit schemes that could apply, were an unconventional oil and gas industry to be developed in Scotland?

What are your views on the community benefit schemes that could apply, were an unconventional oil and gas industry to be developed in Scotland?:

Were unconventional oil and gas extraction to be developed on Scotland, we would welcome the proposal that local communities should share in the benefits of the extraction of natural resources within their vicinity. However, health and well-being, community cohesion and social justice are more important than purely financial considerations.

The Salvation Army always seeks to minister to the whole person, regardless of the presenting issue. We also seek to work for better conditions for future generations as well as addressing the needs of the present. Therefore we would caution that community benefit schemes should not be seen by developers as sweeteners to reduce short-term objections to plans for unconventional oil and gas extraction. Rather they should form part of long term plan for the benefit of the community, under consultation with residents and in partnership with local authorities and community groups.

Economic Considerations

3 What are your views on the potential impact of unconventional oil and gas industry on Scotland's economy and manufacturing sector?

What are your views on the potential impact of unconventional oil and gas industry on Scotland's economy and manufacturing sector?:

Whilst acknowledging the potential for increased employment in the petrochemical sector, a longer term plan for reducing climate change would include reduction in use of hydrocarbons in manufacturing. Hence we would not see this as a strong justification for unconventional oil and gas extraction.

4 What are your views on the potential role of unconventional oil and gas in Scotland's energy mix?

What are your views on the potential role of unconventional oil and gas in Scotland's energy mix?:

We note the Scottish Government's commitment to reducing reliance on fossil fuels, and the progress that has been made in generating electricity from renewable sources. The Salvation Army is playing its part by, for example, installing photovoltaic cells on new buildings such as the one at Livingston.

In view of the progress made, and the acknowledgement that the proportional impact on Scotland's energy production would be minimal, and the inadequate evidence of social and health impacts, we would consider the use of unconventional oil and gas for energy production an unnecessary step.

Environmental Considerations

5 What are your views on the potential environmental impacts of an unconventional oil and gas industry in Scotland?

What are your views on the potential environmental impacts of an unconventional oil and gas industry in Scotland?:

Apart from the immediately visible effects on the amenity of local communities that are covered elsewhere in the questionnaire put forward, such as airborne pollution and noise generated by the above ground support activities, there are known risks that are connected to the extraction process with unconventional oil and gas. These are namely the management of the waste water and the increase in the potential consequences of seismic activity.

The first stated risk demands the highest standards of design, industrial planning and management to ensure environmental compliance at all times. Added to this, human error has always the potential to be the cause of failure to manage waste water.

The second risk is, as stated, an increase in potential consequences of seismic activity. We are unqualified to comment on the engineering basis of whether or not unconventional oil and gas extraction actually causes seismic activity, but logic would suggest that any change in the ground conditions changes the effects of seismic activity. Whether or not these effects are benign or malign, only the future can reveal. Given the unknown impact of seismic activity, then we would express caution about the technology until such time as independent, and by that is meant objective, scientific evidence is provided.

Current debate seems to be driven by two directly opposed viewpoints, who both select evidence in support of their claims. We would especially draw attention to the effect on building structures in a country that has historically not been on the receiving end of strong seismic activity and therefore has not designed buildings to withstand earthquakes. The environmental impact on human life and property may be significant.

6 What are your views on the potential climate change impacts of unconventional oil and gas industry in Scotland?

What are your views on the potential climate change impacts of unconventional oil and gas industry in Scotland?:

The Committee on Climate Change has warned that unconventional oil and gas exploitation "is not compatible with Scotland's climate change targets." The mitigation options listed on the consultation document are not guaranteed to reduce emissions. If the tighter regulations or emission reductions fail to offset the increase in emissions through unconventional oil and gas, progress towards reduced emissions targets may be halted and significant harm done to the environment.

We would view this as a strong argument against exploitation of unconventional oil and gas in Scotland.

7 What are your views on the regulatory framework that would apply to an unconventional oil and gas industry in Scotland?

What are your views on the regulatory framework that would apply to an unconventional oil and gas industry in Scotland?:

We welcome the fact that Scottish Government has in place a strong environmental regulatory framework. We support the suggestions for strengthening regulations surrounding potential unconventional oil and gas, particularly in regard to Impact Assessments and monitoring. The uncertainties acknowledged by the expert panel and the anxieties of the general public would also require strong community engagement and transparency, and we would support including these requirements in any bidding process, should Scottish Government decide to go ahead.

Concluding Remarks

8 Overall, and in light of the available evidence, what do you think would be the main benefits, if any, of an unconventional oil and gas industry in Scotland?

Overall, and in light of the available evidence, what do you think would be the main benefits, if any, of an unconventional oil and gas industry in Scotland?:

Based on the evidence provided, we see minimal benefits in terms of energy production from unconventional oil and gas. There may be some benefit to the petrochemical industry, but do not feel this justifies the environmental risks.

9 Overall, and in light of the available evidence, what do you think would be the main risks or challenges, if any, of an unconventional oil and gas industry in Scotland?

Overall, and in light of the available evidence, what do you think would be the main risks or challenges, if any, of an unconventional oil and gas industry in Scotland?:

By the Scottish Government's own admission, evidence on health risk assessment is "inadequate", and in other areas is debated. As noted above, the Committee on Climate Change identifies serious challenges in meeting emissions targets should the Scottish Government go ahead with unconventional oil and gas exploitation. In our view, these challenges will be hard to overcome both in public perception and in practice.

10 If you have any other comments on the issues discussed in this consultation, please provide them here.

If you have any other comments on the issues discussed in this consultation, please provide them here.:

In our view, based on the information supplied in the consultation document and the considerations above, we believe the Scottish Government would be unwise to pursue unconventional oil and gas exploitation in Scotland.

BACKGROUND TO THE SALVATION ARMY'S RESPONSE

The Salvation Army believes that God has entrusted to mankind the management of the earth's resources, to sustain the environment while protecting and improving the quality of human life. Such authority does not permit abuse of those resources; rather we are accountable to God as stewards

The implications of our continued uncontrolled (and sometimes selfish) use of natural resources on current and future generations has to be considered and action taken to address this. The consequences of such use often have a greater impact on poorer nations, resulting in increased poverty.

As an organisation we have a policy in place to encourage good environmental practice. The Salvation Army has chosen to be certified under ISO14001 the International Standard for Environmental Management Systems, as a demonstration of its commitment to the environment.

In the light of this position, we would also use every opportunity to encourage partner organisations, including Scottish Government, to do all they can to protect and nurture our environment for the benefit of the people of Scotland and the sustainability of our society.

About You

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Are you responding as an individual or an organisation?

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What is your organisation?

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If you are responding on behalf of an organisation, please select a type/sector that best describes your organisation:

Other

If other, please specify::

Church and Charity

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference (we will not publish your email or address details):

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes