

Date: May 19th, 2015

To the Newfoundland and Labrador Hydraulic Fracturing Review Panel,

Divest MUN would like to submit this letter for the consideration of the Newfoundland and Labrador Hydraulic Fracturing Review Panel, and hereby requests to publically present this letter to the panel at the upcoming consultation in Corner Brook.

Firstly, we would like to make note of significant issues in the consultation process. We see the limiting of public consultation sessions to Corner Brook and Stephenville alone as being problematic. The issue of whether or not to allow hydraulic fracturing in Newfoundland and Labrador is a Province-wide one, and as such consultations – in our opinion – should be taking place in all parts of the Province. Even in terms of the West Coast of Newfoundland we feel that holding only two consultations in Corner Brook and Stephenville respectively is highly problematic, and not fully representative of the number of communities that would be affected were hydraulic fracturing to take place here; it is our opinion that it would not be difficult for several more sessions to take place in communities farther away from the two current sessions. The Nova Scotia Independent Panel on Hydraulic Fracturing, for instance, held eleven public consultation sessions.

The makeup of the review panel is also, in our opinion, highly problematic. While consultations themselves have been limited to the West Coast of Newfoundland, there are strangely no representatives present on the panel who are currently residents of the West Coast, there are no representatives present of any local Indigenous peoples' organizations, and none of the panel members are women. We are not convinced, as such, that the panel possesses the expertise to consider many of the potential effects of hydraulic fracturing or is capable of full consideration of the concerns of those who would be affected.

Additionally we are alarmed that climate change is not being considered as a term of reference in the panel's review of hydraulic fracturing. In order to avoid unsafe levels of global warming we must avoid burning the vast majority of the planet's *known* fossil fuel reserves, and no potential fossil fuel development, or use of extraction technology, should be exempt from a consideration of its ramifications in terms of climate change.

Divest MUN has a number of concerns relating to the potential use of hydraulic fracturing in Newfoundland and Labrador; here we outline a few of these which, in and of themselves, warrant the continuation of a ban on the use of hydraulic fracturing in this Province. On the matter of the immediate health effects of hydraulic fracturing we are deeply concerned by widespread reports of adverse health effects related to the process, ranging from reduced birth weights to cases of frequent nosebleeds and headaches and many other effects. Air and water contamination as well as noise and light pollution have been directly associated with the use of hydraulic fracturing, as has increased seismic activity. A recent review by the New York State Department of Health found that high volume hydraulic fracturing (HVHF) activity "has resulted

in environmental impacts that are potentially adverse to public health” and that until more is known about the health risks “HVHF should not proceed in New York State.”¹ Given the depth of research present in the New York review, and the uncertainties surrounding the safety of the process, it is hard to understand how a different conclusion could be reached in the context of Newfoundland and Labrador.

From an economic point of view there is evidence to suggest, as noted under the potential risks and benefits of hydraulic fracturing in a January 2015 report from a select committee appointed by the Yukon Legislative Assembly, that hydraulic fracturing can produce a boom-bust effect on local economies, and can lead to inflation² which could in turn adversely affect the purchasing power of local residents. The majority of the jobs created by hydraulic fracturing would likely be held by specialists brought in from elsewhere, and hydraulic fracturing poses a threat to other industries in the Province such as tourism. Infrastructure degradation, as a result of increased road use and other activities associated with hydraulic fracturing, may also lead to increased infrastructure expenditures.³ Economies overly dependent upon the fossil fuel industry also carry the risk of being adversely affected by fluctuations in prices elsewhere, a fact which has become particularly apparent in Newfoundland and Labrador over the past several months as a result of the collapse of the price of oil.

In conclusion we would like to point out that there is no evidence in Newfoundland and Labrador that a social license exists, or has ever existed, to allow hydraulic fracturing to go ahead.

For these reasons we call upon the Newfoundland and Labrador Hydraulic Fracturing Review Panel to recommend the continuation of the ban on the use of hydraulic fracturing in Newfoundland and Labrador.

Thank you for your time and consideration.

Regards,

C. Curtis

On behalf of Divest MUN

¹ New York State Department of Health. A Public Health Review of High Volume Hydraulic Fracturing for Shale Gas Development, December 2014, p. 12

http://www.health.ny.gov/press/reports/docs/high_volume_hydraulic_fracturing.pdf

² Yukon Legislative Assembly, Final Report of the Select Committee Regarding the Risks and Benefits of Hydraulic Fracturing, January 2015, pp. 18-19 http://www.legassembly.gov.yk.ca/pdf/rbhf_final_report.pdf

³ Dr. Edwin Bezzina, Discussion of the Impact of Hydraulic Fracturing on Tourism, February 2013, pp. 1-15 <https://savewestcoastnl.files.wordpress.com/2013/04/frackingimpacttourism.pdf>