

# Community Chartering and Connecting Scotland Submission to the Scottish UOG Consultation 2017

Below is the submission by the Community Chartering Network (CCN) and Connecting Scotland (CS) to the Scottish Government's 'Talking Fracking' Scotland 2017, public consultation on unconventional oil and gas (UOG). It provides a summary of the common themes across the 16 UOG Community Discussions facilitated by CCN and CS over the course of the consultation.

## Get in touch

If you want to find out more about Community Charters or how to go about creating one, please email us [info@communitychartering.org](mailto:info@communitychartering.org) or call us on 07775 566648 / 0793 508210.

## 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?

The response below has been collated following facilitation support given to 16 Group Discussions, following the Scottish Governments (SG) process provided in <http://www.talkingfracking.scot/>

The information below presents the key findings of those outcomes taken from across the 16 Community Councils (CC) based in the Central Belt:

- Avonbridge and Standburn (Falkirk)
- Shieldhill and California (Falkirk)
- Saline and Steelend (Fife)
- Bonnybridge (Falkirk)
- Grangemouth and Skinflats (Falkirk)
- Torrance (East Dumbartonshire)
- Denny and Dunipace (Falkirk)
- Larbert, Stenhousemuir and Torwood (Falkirk)
- Shotts (North Lanarkshire)
- Kirkintilloch (East Dumbartonshire)
- Plains (North Lanarkshire)
- Westfield, Cumbernauld (North Lanarkshire)
- Robroyston (Glasgow)
- Bo'ness (Falkirk)
- Airth (Falkirk)
- Milton (Glasgow)

All Group Discussions have been hosted by the respective CCs and each has also submitted responses based on the outcomes of their respective discussions. Facilitation support was offered to CCs by the Community Chartering Network (a not for profit organisation supporting [etc]) in partnership with individuals from Connecting Scotland CIC.

There has been a clear and strongly held view that the risks of unconventional oil and gas (UOG) outweigh the benefits to communities. In this regard, a significant majority in each Discussion did not want UOG extraction in their community council area, and most communities were unanimous in refusing any 'social licence' in perpetuity.

Discussions of the potential benefits were had during the consultations, in order to assess the level and nature of the potential benefits. The most often discussed themes were:

- Employment
- Energy security
- Economic benefits (national and local) and
- The price of fuel to households.

However, even where benefits were possible, there were also many caveats where those benefits were not necessarily seen to accrue to the local community, but elsewhere. As a result of these discussions above, over 75% of residents participating in the Discussions felt that there were no benefits of hosting the UOG industry to their communities whatsoever, and an estimated 98% overall that the risks posed significantly outweighed any benefits.

A more detailed summary of points raised in the discussions are below:

#### **Employment:**

- A minority of residents felt that there would be increased levels of employment.
- In discussion, it was felt that the majority of jobs being offered by the UOG industry would be specialist in nature and therefore the skills would more than likely be found from outside of the community and therefore this was seen as not being an immediate benefit to the community.
- It was felt that employment that would become available locally would be short-term in nature (based on SG's timeframes put forward in 'Talking Fracking' presentation) and characterised as low-paid manual work and haulage in nature. The overarching view held was that these would not be significant enough to enhance employment or skill levels locally with a longer-term vision.
- Discussion was had about the increase in local economic activity, due to the 'DIDO workers' (Drive in Drive Out), and that a UOG industry would maintain current work for those involved in the industry (in a few CC areas). These however were dismissed as short-term, in the case of the former, and in both cases, not significant enough to outweigh the potential risks of hosting the industry locally.
- Without neither clear indication nor guarantee of the numbers, types and durations of local jobs being provided, residents were unable to see employment as a clear benefit to their community.

#### **Energy Security:**

- Put forward by a smaller minority of residents.
- In discussion it was seen that the fuel available was short-term in nature and the need for energy security was currently small, due to no significant threat currently being experienced globally. The argument for energy security was seen as one that better supported keeping the resources underground, as they would provide a source for energy should there be a greater case for energy security in the future.
- It was put forward in several Discussions that INEOS had already stated their intention to use Scottish UOG for chemical feedstock, and therefore that the energy security argument did not apply.
- The fuel extracted by the UOG industry was seen as fuel that would be sold on the open market for industry purposes and therefore was not being extracted to support energy security. Diagram 1 in the draft Energy Strategy supports this view, which shows that 74% of the primary energy supply is for exports (761TWh) with only 16% going towards domestic use (169TWh), with the remaining 10% being lost as conversion and distribution losses (102TWh).
- On these grounds, energy security was dismissed as a potential benefit to the communities.

#### **Economic Benefits (local and national):**

- Some benefits were seen as mentioned above but these were seen to be small to the community and not significant to outweigh the potential risks.
- Most of the economic benefits were seen as going to the industry, as opposed to the community or even the state.
- Doubts were raised as to the off-shore nature of INEOS, with its offices based in Switzerland and therefore the amount of revenue that could be gained by the state through taxation. Many felt this represented an insufficient level of contribution nationally and therefore represented no significant local benefit.
- Many were concerned that there would economic dis-benefits to communities and the state, due to the risks and impacts cited below. These included the rise in cost to the NHS, road and infrastructure repairs, dealing with incidents and accident, water supply, decommissioning, industry subsidies, falls in property prices etc. It was felt that there would be hidden costs to the NHS, due to the potential risks associated with pollution, particularly fugitive emissions.
- A dis-benefit to the renewables industry was also discussed, as UOG development would signify postponing further investment into the renewables sector, as well as Scottish Government's attention.
- Dis-benefits were also seen to sustainable development due to the impact on the countryside and to the farming and tourism sectors.
- On this basis, more potential economic dis-benefits were seen to the community than benefits.

#### **Price of fuel to households:**

- This was raised on a number of occasions however in discussion this was dismissed as a potential benefit with residents citing that

UOG resources would be used by the industry and were not intended for domestic household fuel purposes. Many cited SG's statement that it was 'unlikely' there would be a reduction in fuel costs. Most believed the industry would sell to the highest bidder and that profits would be retained for shareholders, not passed onto the consumer.

- As a result of these discussions above, over 98% of residents participating in the consultations felt that there were no significant benefits of hosting the UOG industry to their communities and that the risks posed significantly outweighed any benefits.

## **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?**

The response below has been collated following facilitation support given to 16 Group Discussions, following the Scottish Governments (SG) process provided in <http://www.talkingfracking.scot/>

The information below presents the key findings of those outcomes taken from across the 16 Community Councils (CC) based in the Central Belt (as listed above in Q1). All Group Discussions have been hosted by the respective CCs and each has also submitted responses based on the outcomes of their respective discussions. Facilitation support was offered to CCs by the Community Chartering Network in partnership with Connecting Scotland.

There has been a clear expression by both Community Councils and residents alike, that the risks posed by UOG are too many, too complex to mitigate and too significant in consequence, that they are not prepared to grant a social licence for UOG to proceed in the local areas, nor do they feel it is beneficial to Scotland as a whole.

The themes that have most commonly been put forward by residents across the Community Council areas are as follows:

- The lack of trust in the regulatory bodies to protect citizens
- Cumulative impacts of pollution to environment and human health
- Incompatibility with, and danger to, community vision and direction
- The complex local geological context
- Noise/traffic/infrastructure
- Housing
- An unwillingness to support INEOS' operations

A more detailed summary of points raised in the discussions are below:

### **Trust in the regulatory authorities:**

- The lack of trust in the regulatory authorities to adequately protect people and the environment from pollution was a recurring theme, expressed by the majority of participants, in all consultations conducted. This lack of trust was based mainly on the capacity and ability for SEPA to monitor the industry effectively.
- Past direct experiences of industries not being effectively monitored and controlled were cited by residents from many different CC areas.
- Many residents felt that the industry would be self-regulating for a number of reasons such as: the lack of staff within SEPA and other regulators due to current cuts to public spending; the difficulty in monitoring a new industry spread over a vast area; the diverse range of potential sources of pollution, in particular fugitive emissions; the necessity of the industry to report to regulators on their activities; the unwillingness of regulators to interfere with the economic activity of significant corporations; and the lack of trust felt towards the industry to do so honestly and transparently.
- Many also felt that the industry exerts power over the Scottish Government, regulators, communities and the Local Authority and therefore lacked trust that accountability would permeate UOG processes, particularly where accidents or pollution were concerned.
- Concerns were raised about the potential costs of clean ups in such cases where the industry became bankrupt and the inevitability of tax payers to pick up the burden. The point was also made with regard to decommissioning and clean up following industry activity/extraction.
- The lack of baseline data or information available regarding air and water borne and other forms of pollution was regularly raised and was significant cause for concern amongst some people.
- The lack of trust expressed here regarding regulatory authorities and the industry also extended to the Local Authority and the rule of law for others.

### **Risks to human health and environment due to pollution:**

- By far the most commonly cited risks concerned the levels and scale of dangers to human health and the local environment from pollution due to UOG activities, incident and/or accident.

- The proximity of the industry's activity to residents was a major cause for concern, as well as the infancy of the industry. The latter pointed to concerns about the ability to avoid accidents or even mitigate against the potential consequences.
- Concerns were made with regard to air and water borne toxins, natural and artificial, including endocrine disruptors (EDCs), carcinogens, especially the releases of dioxins, benzene, methane and radioactive material. The impact of waste materials on the environment was also raised in this light and many demanded clarity on treatment and the destination of industrial waste.
- Residents were aware of early and continually emerging reports around the world of incident or accident causing contamination of environmental systems and their impacts on both human and animal health.
- Many felt that the release of methane into the atmosphere was worse than Co2 for the climate and saw it in opposition to SG's globally leading example of its climate change targets.
- Many felt a lack of security and guarantee that the industry could keep citizens and the environment safe. Full and upfront disclosure of all the chemicals used throughout the industrial process was seen as a bare minimum condition in the consideration of whether or not to allow UOG operators in the area. Concerns were also mentioned regarding the absence of baseline data in order to clearly assess and monitor the above levels of risk.
- The chances of the risks of pollution from incident or accident were felt to be significantly increased due to the intensiveness of the industry, as well as operators motivated by short-term profit. The geologically complex context of the Central Belt and the past mining activities were also seen in this light (see below).

Overall and for these reasons alone, the UOG industry presented an 'unacceptable level of risk' for communities to gamble on.

#### **Hydrogeological context:**

- The complexity of the local geological context was an often cited concern for many residents, this included the major Campsie fault, the former mine shafts and mines, as well as the extensive stretch of the water table in the area. Many communities had already experienced accidents such as subsidence, concerning former mines, for which many felt there were not adequate records kept. This created an additional level of risk, to an already potentially hazardous industry. Many felt there were too many 'unknowns' to effectively keep the UOG industry safe.

#### **Traffic, noise, infrastructure:**

- Traffic, noise and the sight of industry at the levels and frequencies put forward in SG's information were seen as too much for residents to bear and that it would cause, frustration, worry and stress. Many CCs felt the impact of local industries was already substantial and that the research had not considered individual scenarios, and the cumulative effect of adding UOG to the existing burden. The lack of access to large areas of the countryside locally and across Central Belt were also seen in this light.
- Residents cited the tangible impacts on physical health from diesel fumes and particular matter, and also the intangible impacts to mental health, which were seen as significant.

#### **Housing**

- A large number of residents cited concerns regarding the devaluation of their homes.
- A number of reasons were behind this: the effects of drilling potentially affecting structures of buildings, as reported in Lancashire; the claim that insurers were refusing to insure houses against damages related to the UOG industry; the potential increase in insurance costs as a result of the former point; the potential for houses to devalue due to the industry becoming active in the area, the destruction of scenic views and the area becoming associated with pollution or 'getting a bad name'.
- Many also felt that housing insurance would rise and that it was unfair that they should bear this cost.

#### **Profit motives of the industry:**

- Clear unwillingness to support the profit incentives and gains of the industry (INEOS) were expressed by many. It was felt that INEOS put 'profits before people', which only increased the sense of danger felt by many concerning the potential risks listed above.
- The feeling that INEOS was amassing too much 'power' was expressed by many. Past experiences of 'bribery' and 'foul play' witnessed in communities were cited and INEOS' tax status and off shore headquarters were regularly raised.
- The dangers of too many assets of strategic national significance being owned by one private company, particularly a politically sensitive resource, was cited as another risk that this industry posed to both local and national contexts.

For these reasons, there was clear agreement and little doubt among over 98% of residents participating across all consultations that the risks carried too much burden for communities to bear, in particular as the industry were set to gain the vast majority of the benefits that UOG extraction offered.

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

This section forms the main substance of our consultation and revolves around the OUR MESSAGE TO GOVERNMENT questions (or what we think the Scottish Government need to take into account when considering the future of unconventional oil and gas development in Scotland).

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**There has been a clear and strongly expressed desire not to give a social licence for the UOG industry in all areas where consultations have been carried out. This wish was expressed by over 98% of participants.**

- Communities feel that they are faced with carrying the full burden of the UOG industry and its potential risks, while INEOS is set to gain fully from the economic benefits of UOG extraction.
- There is lack of trust in INEOS' company practices and no faith that the company will work to keep people and their local environments safe and clean. INEOS is seen as putting profit first and foremost in its company's priorities and with the level and scale of risks associated with the UOG industry, resident's concerns represent a threat to their security and safety, along with their ability to lead and live happy and healthy lives.
- There is clear lack of trust amongst many towards the ability of regulatory bodies to regulate industries effectively, as well as in INEOS working in a transparent manner. Further doubt was raised by some as to the ability of Local Authorities and the law to effectively protect people from potential dangers to health and pollution to the local environment.
- Many have chosen to invest their livelihoods in residing in their localities and do not wish to move away for the purposes of one company's profit motives, nor lose their investments through the devaluation of their properties.
- That there was a lack of information associated with the risks of UOG industry in the SG presentation materials was often cited. Many felt that the information provided in 'Talking Fracking' neither researched nor scrutinised the risks of a UOG industry carefully enough. Residents had hoped new and emerging news from USA and Australia on the impacts of UOG would have been included and provided in the consultation materials.
- Concerning the levels of mistrust expressed, questions were raised about whether the levels of ownership of key energy resources by INEOS alone offered security for the Scottish and UK Governments. Many felt that INEOS exerted too much power politically and economically and put democratic decision-making at risk. Some doubted that SG were able to stand up the industry.
- Many communities had seen hard work being put into their local areas, often by volunteers, to regenerate and 'clean up' their localities following past industrial activity in the area. Many saw this, as well as the number of conservation areas designated in the area, as positive steps towards moving their communities forwards towards progress and saw the potential arrival of the UOG industry as a backward step.
- Many people saw no reason to support a short-term fossil fuel-based industry when Scotland carries such great renewable energy potential and would prefer SG to put their attention to further developing a renewable industry. Many saw the promotion of the UOG industry as a disincentive to the renewable industry.
- Many expressed their wishes and hopes for SG to listen to residents' concerns and their desired path for the future direction that Scotland could take.

Further to the above, the Community Chartering Network and Connecting Scotland have gathered notes reflecting on the Talking Fracking Group Discussion consultation process. These are offered as constructive feedback to SG, in order to further develop this participative group approach in future consultations.

- A recognition of the progressive nature of the group participation component in the consultation process. It is felt that such opportunities provide fertile spaces for citizen participation in matters of significant local and national concern.
- We have been impressed by the clarity of ideas and articulation of thoughts regarding the question of UOG and the broad range of opinions expressed in the consultations. The group discussion processes have helped to not only disseminate information but also provide the opportunity for community members to reconsider and develop their opinions on the topic in familiar and comfortable settings.
- In almost all consultations, a sense of mistrust has been expressed regarding consultation processes themselves. Many have attended doubting whether their opinions would be heard, or even whether they would have a chance to express their concerns. A sense of cynicism has been displayed in relation to people's expectation of unfair, corporate and/or government influence. There is a sense that people are losing trust in the Government to protect and work for community interests, however, all of the processes that we facilitated have been received with appreciation. We feel this is in large part due to people being provided genuine opportunities to express their opinions and be heard.

- We feel that a commitment to genuine public consultation on controversial and complex issues must be suitably resourced to enable communities or Community Councils (CC) to engage as widely as possible and to give suitable time for people to consider the issues. A slower, deliberative process may be better suited. A number of areas might be improved in this light:

(i) A longer consultation period, giving sufficient time to prepare to organise and host a consultation.

(ii) An earlier notice period given regarding the start of the consultation, particularly to CCs.

(iii) SG consultation resources: more thought could be given to the balance between the provision/dissemination of information and the opportunities for group discussions, within the format of the consultation itself. For many residents taking in the information and discussing them in one meeting was too much to incorporate. The result being that there was either too much for people to consider and issues may have been missed or that adequate consideration could not be given to particular issues. In this light, some suggestions may be; to disseminate information on the topic in question prior to the consultation itself, so that residents arrive better prepared or to create opportunities for a number of key stakeholders to present their positions, followed by small group discussions, again prior to the group discussion component of the consultations. A number of ways in which consultations can be organised to promote both consideration of significant issues and open and free discussion can be explored.

(iv) Broader questions provided in this consultation may have produced more informative responses on residents' ideas and wishes on the topic of energy as well as on other issues. It is felt that questions 1 and 2 of this consultation have had the effect of narrowing discussions on UOG. Broader questions on topics such as the national energy strategy, renewables and residents' visions of the future of their communities did come out of almost all discussions and these were seen as being fundamental to and underlying of people's views on UOG. Asking broader questions to consider the importance of UOG in the context of community life, may have resulted in a better understanding of residents needs and wishes. The consultation on UOG would in this sense have shed more light on the ways in which communities wish to see the future development of their localities and how the Scottish Government can support such progress.

(v) Further consideration given to the nature and sources of information provided by SG in the consultation materials, in order to present unbiased and wide-ranging views.

(vi) Information provided on the decision-making process of SG following such a consultation process, 'What happens next?' 'How will SG respond to your opinions' etc.

(vii) The materials concerning the guidelines and delivery of the consultation could be made more 'user-friendly'; the number and size of the documents could be reduced for ease of navigation, particularly for people unfamiliar with the subject or hosting a consultation (often the case for CCs).

(viii) The availability of resources (e.g allocated to CCs), for the delivery/hosting of consultations, for hall bookings, printing of SG materials, notice leaflets, facilitation support where required, materials such as post-it notes pens etc.

(ix) Increase funding or resources available to CCs to be able to provide hosting/facilitation capabilities, training in the significance and delivery of impartial participatory consultation processes.

(x) A potential framework agreement for appropriate organisations and entities promoting citizen participation to be invited to bid for and undertake the consultation processes, should such processes become a regular component of consultations.

### *Working in Partnership to Put People and their Values at the heart of Planning*

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