

Council of Canadians calling for ban on fracking in Nova Scotia

Subject	Fracking must be banned
From	Email Address
To	HFRReview

Dear Dr. Wheeler and fracking review panelists,

Thank you for the opportunity to provide comments for the hydraulic fracturing review in Nova Scotia.

I join with the Council of Canadians in calling for a ban on fracking in Nova Scotia. Fracking requires massive volumes of water, with no safe methods to dispose of fracking wastewater. It also has huge climate impacts, and there is widespread community opposition to fracking in the province.

WATER USE

Fracking uses unsustainable amounts of water. A fracking project requires anywhere from 10 million to 200 million litres of water. From 2007-2009, Nova Scotia Environment permitted the withdrawal of up to 1,334,000 litres of fresh water per day from the Kennetcook River for fracking. While the permitted amount was not fully used, the fact that such a high volume was approved is unacceptable.

Half of Nova Scotians rely on groundwater and half on surface water sources for drinking water. In 2012 Nova Scotia communities experienced the worst drought in more than a decade. Water is central to the very existence of people, plants and animals, and all of it must be protected for the common good from generation to generation.

FRACKING WASTEWATER

A typical fracked well requires the use of between 55,000 and 220,000 litres of chemicals, but the specific combination and quantities of chemicals used are considered proprietary trade secrets. While some companies are voluntarily reporting some of the chemicals they use, they are not legally required to disclose the full list. The lack of information about fracking chemicals makes it extremely difficult to know what chemicals are in fracking wastewater and what potential health risks they pose.

The National Wildlife Federation points out that there are 13 different types of chemical additives that are needed in the hydraulic fracturing process including acids, clay stabilizers, gelling agents, corrosion inhibitors, biocides, friction reducers, and surfactants. The Endocrine Disruption Exchange has warned that these chemicals have a range of negative health and environmental impacts.

Under the Chemicals Management Plan (CMP), Environment Canada reviewed chemicals used in the fracking process in both Quebec and the U.S. Approximately half of the fracking chemicals did not meet the CMP criteria for further investigation, meaning these chemicals have not been assessed for potential risks to the public.

Currently in Nova Scotia, some wastewater (approximately 20 million litres) from the province's sole fracking operation sits in tailings ponds in Kennetcook while more "treated" wastewater is held at the

Atlantic Industrial Services (AIS) Debert facility. I applaud the Nova Scotia government for holding public meetings about the wastewater and for testing it. I also applaud the government's decision to ban the importation of fracking wastewater and for pursuing this review.

However, I am concerned about the pools of fracking wastewater that remain in Nova Scotia. On March 5, 2014, Environment Minister Randy Delorey told community residents that some of the wastewater in Kennetcook leaked into a nearby brook this winter due to overflow. "Treated" wastewater has also been discharged through municipal wastewater systems in Colchester and the Town of Windsor.

The handling of wastewater in Nova Scotia highlights a key reason why fracking should be banned in the province: there are currently no methods to safely dispose of fracking wastewater.

CLIMATE IMPACTS

Despite industry representatives and some governments promoting natural gas as a "clean, green fuel," studies show that fracked natural gas can produce as much greenhouse gas emissions as coal. Fracking releases large amounts of natural gas, which consists of both CO₂ and methane, directly into the atmosphere. Methane, in particular, is a very powerful greenhouse gas because it can trap 20 to 25 times more heat in the atmosphere than carbon dioxide. Fracking and other parts of the fossil fuel industry are preventing Canada from reducing its greenhouse gas emissions and doing its fair share to mitigate the global climate crisis.

Fracking would threaten the gains made on the implementation of the Environmental Goals and Sustainable Prosperity Act (2007) and put Nova Scotia's goal of being "one of the most environmentally and economically sustainable places in the world by 2020" in jeopardy.

FRACKING MUST BE BANNED

Water is a living commons, to be shared, protected, carefully managed and enjoyed by all. Communities not only have a human right to water, but also a responsibility to protect those waters. The United Nations has recognized water and sanitation as a human right, which means that every government must now come up with a plan of action based on the "Obligation to Protect, Respect, and Fulfill" this right. Maude Barlow, National Chairperson of the Council of Canadians, points out that the obligation to protect means that a government is obliged to prevent third parties from interfering with the enjoyment of the human right. This would mean, for instance, protecting local communities from pollution and inequitable extraction of water by corporations or governments.

Policies and decision making on water use should be based on recognizing water as a commons, public trust and human right. Communities all over Nova Scotia and the Atlantic have opposed fracking, and must be part of the decision making process. I applaud this first step and urge panel members to include the public's comments in the final decision. Please do the right thing and ban fracking in our province.

Sincerely,

Name

Address