

**Nourish Scotland Response to:  
“Talking Fracking” A Consultation on Unconventional Oil and Gas (UOG)**

May 2017

Nourish Scotland is a food justice NGO advocating for a fairer, healthier and more sustainable food system.

Nourish Scotland welcomed the Scottish Government’s moratorium on UOG development in January 2015, agreeing with the need for research to explore the issues further.

As a member of the Scottish Environment LINK Unconventional Fossil Fuel Subgroup we have contributed to the stakeholder engagement process of the Scottish Government-commissioned consultant research projects in 2015-2016 – primarily in relation to economic impacts (KPMG).

On this, we would like to reiterate the view held by Environment LINK colleagues that the consultant reports produced largely omitted adverse impacts from the UOG industry, particularly in relation to environmental externalities.

Scotland’s food and drink industry, and our food system more widely, is uniquely vulnerable to the risks posed by UOG. We hope this evidence, which should be read as supplementary to our contribution through Scottish Environment LINK,<sup>1</sup> may further inform the dialogue.

Overview

Nourish Scotland believes that UOG extraction has little to offer the Scottish economy and carries with it significant reputational risks to Scotland’s largest export industry – food and drink, which cannot be offset. UOG extraction is furthermore at odds with Scotland’s ambitions to be a global climate leader.

We recognise that there are some limitations in available evidence, particularly in relation to public health, and on this basis encourage the Scottish Government to be guided by international law, principles, and best practice in adopting a precautionary approach.

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<sup>1</sup> Scottish Environment LINK, Response to “Talking Fracking” A Consultation on UOG (2017)

Q1: What are your views on the **potential social, community and health impacts** of an unconventional oil and gas industry in Scotland?

There is a growing evidence base of the risks placed on human health from direct exposure to toxic chemicals used and returned in UOG – both for industry workers and communities more generally.

This comes across clearly in Health Protection Scotland's Public Health Impact Assessment (PHIA) which highlights that where evidence is available it raises significant public health risks – including that a number of air and water-borne environmental hazards “would be likely to occur”. We agree with Health Protection Scotland that where evidence is limited the Scottish Government should adopt a precautionary approach.<sup>2</sup>

An area not covered by the PHIA is indirect bioaccumulation risks through consumption of food exposed to polluted air or water. As above, a precautionary approach should be adopted until there is sufficient evidence to rule out any risk.

Rural communities tend to be geographically closer to UOG extraction, though the area under license in Scotland could carry direct risks from contaminated water bodies directly to Scotland's two largest urban communities in Glasgow and Edinburgh.

Prime and good to moderate agricultural land is currently within the area covered by Petroleum Exploration and Development Licenses as issued by the Department of Energy and Climate Change.

This land is highly valuable and limited in Scotland, with only 8% of land area qualifying as prime agricultural land – capable of producing a wide range of crops, and 20% of land area qualifying as good to moderate. The cumulative impact of fracking on prime and moderate to good agricultural land in addition to existing pressures from road and housing development need to be further explored.

Q2: What are your views on the **community benefit schemes** that could apply, were an unconventional oil and gas industry to be developed in Scotland?

We agree with the concerns raised by Scottish Environment LINK regarding community benefit schemes, finding any such benefit to be inadequate, short-term and add that these may also be divisive.

We would like to emphasise that benefit schemes more generally are unlikely to be able to replace lost reputational value from food production - these are not risks that can be offset.

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<sup>2</sup> Health Protection Scotland, A Health Impact Assessment of UOG in Scotland (2016) accessible at: <http://www.hps.scot.nhs.uk/resourcedocument.aspx?resourceid=3101>

Q3: What are your views on the potential impact of unconventional oil and gas industry on Scotland's **economy and manufacturing** sector?

Marginal economic gains have been identified in UOG extraction in Scotland, estimated to value 0.1% of Scotland's GDP to 2062.<sup>3</sup> Other gains could include up to 1,400 jobs, though we note that many of the direct high-value posts linked to UOG are likely to be internationally filled due to skills and experience limitations.<sup>4</sup>

Food and drink on the other hand is identified in Scotland's Economic Strategy as a key Growth Sector. It is difficult to give a firm percentage of Scotland's food system contribution to GDP – with food cutting across multiple headings including agriculture, forestry and fishing, manufacture, and services.<sup>5</sup> Food and drink production alone is valued at over £14bn in Scotland and directly employs 114,700 people.<sup>6</sup> Food and drink is also Scotland's largest export industry, representing £5.5bn in 2016, 75% of which was from whisky exports.<sup>7</sup>

Scotland is internationally renowned as a land of good food and drink, the reputational risk to 'Brand Scotland' from an UOG-related pollution incident could be catastrophic. Nourish Scotland was supportive of the Scottish Government's precautionary opt-out of Genetically Modified crops, thereby banning cultivation in Scotland, on similar grounds. When announcing the opt-out in August 2015, former Cabinet Secretary for Rural Affairs, Food and Environment, Richard Lochhead, said:

..." I am concerned that allowing GM crops to be grown in Scotland would damage our clean and green brand, thereby gambling with the future of our £14 billion food and drink sector.

"Scottish food and drink is valued at home and abroad for its natural, high quality which often attracts a premium price, and I have heard directly from food and drink producers in other countries that are ditching GM because of a consumer backlash.

"That is why I strongly support the continued application of the precautionary principle in relation to GM crops and intend to take full advantage of the flexibility allowed under these new EU rules to ban GM crops from being grown in Scotland.

"The Scottish Government has long-standing concerns about GM crops - concerns that are shared by other European countries and consumers, and which should not be dismissed lightly.

"I firmly believe that GM policy in Scotland should be guided by what's best for our economy and our own agricultural sector rather than the priorities of others."<sup>8</sup>

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<sup>3</sup> KPMG, Economic Impacts Assessment and scenario development of unconventional oil and gas in Scotland (2016) accessible at: <http://www.gov.scot/Resource/0050/00509321.pdf>

<sup>4</sup> KPMG (2016)

<sup>5</sup> Scotland's Gross Domestic Product, 2016 Q 4, accessible at:

<http://www.gov.scot/Topics/Statistics/Browse/Economy/PubGDP/GDP2016Q4/DOCS>

<sup>6</sup> Office of the Chief Economic Advisor, Growth Sector Briefing – Food and Drink (2017) accessible at:

<http://www.gov.scot/Resource/0051/00516876.pdf>

<sup>7</sup> Scottish Government press release: Record year for food and drink exports (19 March 2017) accessible at:

<https://beta.gov.scot/news/record-year-for-food-and-drink-exports/>; Scottish Government, Export Statistics Scotland 2015 (2017) accessible at: <http://www.gov.scot/Resource/0051/00514198.pdf>

<sup>8</sup> Scottish Government press release: GM crop ban (09 August 2017) accessible at:

<https://news.gov.scot/news/gm-crop-ban>

In August 2016, Victoria became the first state in Australia to ban fracking – and in doing so emphasised the risks from fracking to farming as a key reason in their decision. The Premier of Victoria, Daniel Andrews, said:

“Our farmers produce some of the world’s cleanest and freshest food. We won’t put that at risk with fracking.”<sup>9</sup>

Australia’s Minister for Resources, Wade Noonan, echoed this message as the legislation banning fracking progressed:

“It threatens the reputation of our vital agricultural sector and puts the state’s world-class food producers and regional economies at risk.”<sup>10</sup>

In addition to the reputational risks to Scotland’s food and drink industry, there are significant personal risks which farmers in the North of England, where applications for fracking have been approved, have found they may be unable to insure for.<sup>11</sup>

We also note, as above, that high value prime and good to moderate agricultural land is within the licensed area for UOG extraction – further reducing the availability of this land for food production.

Q4 What are your views on the potential role of unconventional oil and gas in Scotland’s **energy mix**?

There is limited space in Scotland’s energy mix for new fossil fuel-based energy development if Scotland’s climate change targets are to be taken seriously.

We believe the Scottish Government should focus attention on further renewable energy development – where the risks are significantly lower, and the returns – including community benefits, are greater.

Thinking specifically of the balance of risk and benefit to the food and drink industry, UOG extraction generally poses pollution and reputational risks with few benefits, whereas renewable developments, for example through farm business diversification strategies, can create opportunities for a sustainable income.<sup>12</sup>

Q5: What are your views on the potential **environmental impacts** of an unconventional oil and gas industry in Scotland?

Air, water and soil pollution incidence are the most significant UOG related environmental impacts to food and drink – with both crops and livestock at risk of poison from toxic chemicals used and returned in UOG extraction.

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<sup>9</sup> Premier of Victoria Press Release: ‘Victoria Bans Fracking to Protect Farmers’ (30 August 2016) accessible at: <http://www.premier.vic.gov.au/victoria-bans-fracking-to-protect-farmers/>

<sup>10</sup> Premier of Victoria Press Release: ‘Banning Fracking Once and for All’ (8 February 2017) accessible at: <http://www.premier.vic.gov.au/banning-fracking-once-and-for-all/>

<sup>11</sup> Farmers Weekly, ‘Insurance unlikely to cover fracking damage, farmers warned’ (2 June 2016) accessible at: <http://www.fwi.co.uk/business/insurance-unlikely-to-cover-fracking-damage-farmers-warned.htm>

<sup>12</sup> See NFUS Rural Development Initiative, accessible at: <http://www.renewableenergyonfarms.co.uk>

Crop and livestock contamination can occur directly through fugitive emissions, leaks and spills of toxic chemicals, and leaks and spills of waste water – including permeation into surface and groundwater used for food production.

Scottish horticulture is highly dependent on water for irrigation – whilst the hazardous practices relating to contaminated wastewater being used for irrigation in the US are unlikely to be permitted in Scotland, there have been concerns raised as to whether there are adequate wastewater treatment facilities in the UK.<sup>13</sup>

Environmental impacts have been comprehensively explored in Scottish Environment LINK's evidence to this consultation – we restate that the absence of a comprehensive environmental impact assessment throughout the course of the commissioned consultant research projects is concerning.

Q6: What are your views on the potential **climate change impacts** of unconventional oil and gas industry in Scotland?

As highlighted in Scottish Environment LINK's evidence to the consultation, UOG extraction would run counter to the Scottish Government's efforts to be a world leader on climate action.

Developing an UOG industry in Scotland would make it exceptionally difficult to meet legally binding targets in the Climate Change (Scotland) Act, as well as fulfil ambitions in the Government's draft Energy Strategy to decarbonise energy by 2050.

As the Scottish and UK governments have recognised elsewhere, climate change poses a number of direct threats to food security in Scotland, both in terms of our ability to produce and to import food.<sup>14</sup>

Q7: What are your views on the **regulatory framework** that would apply to an unconventional oil and gas industry in Scotland?

Nourish Scotland agree with the risks identified in Scottish Environment LINK's evidence to the consultation, drawing particular attention to the complexity of regulating an inherently high risk industry.

We also note the additional regulatory barriers arising from limited resources in relevant public bodies – including SEPA, local authorities and planning authorities.

Q8: 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?

We see the benefits of an UOG as marginal and largely concentrated within the extracting organisations.

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<sup>13</sup> Scottish Environment LINK (2017)

<sup>14</sup> UK Climate Change Risk Assessment (2017) accessible at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/584281/uk-climate-change-risk-assess-2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf); A Climate Change Risk Assessment for Scotland (2012) accessible at: <http://randd.defra.gov.uk/Document.aspx?Document=CCRAforScotland.pdf>

Q9: 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 main risks to food and farming from UOG are from pollution incidence and reputational damage.

Both actual pollution, and the perception of a likely pollution incident, are exceptionally high risks to Scotland's brand as a land of clean and green food and drink, for the relatively marginal and temporary projected gains of UOG extraction.

Q10: If you have **any other comments** on the issues discussed in this consultation, please provide them here.

N/A