



Official Response

SUBJECT: Talking “Fracking”: A Scottish Government Consultation on Unconventional Oil and Gas
REQUESTED BY: Scottish Government
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Why is the Church of Scotland interested?

The Church established the project *Responding to Climate Change* in November 2007. Its purpose was to help the Church develop an effective response to climate change, both in its own actions and in its contribution to the wider debate. The project reflects the Church’s ethical concern about climate change summed up in a report to the General Assembly in 2009:

The Church of Scotland is concerned that climate change poses a serious and immediate threat to people everywhere, particularly to the poor of the earth; and that climate change represents a failure in our stewardship of God’s creation. We accept the need to reduce the emissions of greenhouse gases urgently to avoid dangerous and irreversible climate change; and to promote a more equitable and sustainable use of energy.

In this context the Church welcomes the consultation on unconventional oil and gas and the opportunity to share information and learning it has gathered from congregations and others. The Church of Scotland has been involved in the public debate on fracking for some time holding several meetings around Scotland, including a half day conference in Hamilton, in 2014 and 2015. The outcome of these meetings was a report to General Assembly 2015 on which this response is based.

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

The General Assembly of the Church of Scotland considered a report on fracking in May 2015.¹ The report was sceptical of the claims made on behalf of fracking but did accept that some of the risks associated with fracking could be managed if a rigorous regulatory regime were put in place. A significant concern for the Church of Scotland is not just the local impacts but that exploiting new sources of unconventional gas or oil may prolong our dependence on fossil fuels. In this context

¹ *Fracking and the development of onshore oil and gas resources in Scotland*, Report to the General Assembly of the Church of Scotland, May 2015.

Scotland's continuing reliance on gas for domestic and non-domestic heating is an issue that needs to be considered. Over three quarters of houses in Scotland have gas central heating, and as supplies of gas from the UK sector run down, Scotland will be increasingly dependent on new sources of gas, either imported from other countries in Europe by pipeline or by tanker from around the world; or by developing new onshore resources in the UK, which probably means using unconventional gas. The preferred option of the Church of Scotland is to reduce the demand for gas as set out in the draft Scottish Energy Strategy.² The draft strategy sets out a pathway to reduce the use of fossil fuels for heating by developing low carbon alternatives to gas, a strategy that would both reduce carbon emissions and the need to find new sources of gas.

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?

Community benefit schemes have been developed for renewables, particularly wind farms, and are a useful source of income for nearby communities. But such benefits are incidental benefits and are not sufficient reason to develop unconventional oil or gas.

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

Claims made by the industry must be treated with caution. There would no doubt be some employment generated by unconventional oil and gas, and this may in part offset loss of jobs employment brought about by the decline of the North Sea oil and gas industry. However there are likely to be more jobs in the development of renewable energy, new low carbon heating and associated technologies as these sectors develop. These offer longer term opportunities for Scottish businesses to grow and potentially become market leaders; whereas fracking would inevitably be a short term opportunity given the limited resources of onshore gas and oil identified in Scotland by the British Geological Survey.³

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

In line with proposals set out in the draft Scottish Energy Strategy to move towards a low carbon economy, there will need to be a range of measures to reduce Scotland's dependence on fossil fuels. The Scottish Government is committed to reducing emissions of greenhouse gases by 80% by 2050, a target that has become more significant since the Paris Climate Agreement (CoP 21) in 2015. For these reasons it does not seem sensible to consider developing new sources of fossil fuel, rather we should be seeking to reduce our dependence on those fossil fuels currently in use.

² *Draft Scottish Energy Strategy: The Future of Energy in Scotland*, Scottish Government, January 2017. The Church of Scotland has submitted a separate response to the draft strategy.

<http://www.gov.scot/Publications/2017/01/3414>

³ The British Geological Survey (BGS) estimate that the potential resources of oil and gas in the Midland Valley of Scotland (the central belt) are relatively small compared to England. The full report from the BGS can be accessed here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/324541/BGS_DECC_MVS_2014_MAIN_REPORT.pdf

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

Fracking has been widely criticised because of its local environmental impact and some anecdotal evidence from the USA has tended to support this. The report to the General Assembly in 2015 examined a range of these issues including earthquakes; water usage and possible pollution of ground or surface water; fugitive emissions; and local planning impacts. The report concluded that some of the risks could be managed if a proper monitoring and regulatory regime was in place, but there were still some uncertainties. It was not clear, for example, what scale of fugitive emissions (loss of gas to the atmosphere) might be associated with fracking. The report also drew attention to risks associated with abandoned mine workings, not always reliably mapped; and how issues of noise, traffic and other disturbances associated with the development of fracking wells could be managed in the central belt of Scotland, the most densely populated and urbanised part of the country. As the Scottish Government notes on its website 'Most of Scotland's unconventional oil and gas deposits are underneath densely populated parts of the country' unlike wind, water and marine power, which tend to be in more remote locations.

These local environmental issues are all significant, but we believe the global concern about climate change is more important. Underpinning our concerns about fracking and other fossil fuel industries in Scotland is the need to reduce our dependence on fossil fuels to meet Scottish and international targets and it is difficult to see how the development of fracking could be consistent with these targets. An alternative would be to invest in energy efficiency to reduce our demand for heating and to reduce gas consumption. The Church of Scotland is a member of the Existing Homes Alliance, a coalition of housing, environmental and anti-poverty groups calling for the improvement of the energy performance of Scotland's existing housing stock. We believe that this is likely to be a more effective strategy to tackle fuel poverty and reduce carbon emissions.

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

As noted above, climate change is a most significant consideration for the Church of Scotland in responding to this consultation. Over recent years we have become increasingly concerned as stories from partner churches around the world have repeatedly told us of the impact of climate change on the lives and wellbeing of communities in different continents, on many habitats and other species. For example, we have recently learned from the Church in Tuvalu that rising sea levels are leading to the destruction of island habitats, critical problems of water and food security and that it is now very likely that the inhabitants of the islands will have no choice but to leave their homes and seek a new place to live. We therefore fully accept the need to respond to climate change, to reduce emissions across Scotland, and for this reason support the emission reduction targets in Scottish Climate Change legislation, and the proposals to decarbonise the economy set out in the draft Scottish Energy Strategy.

We recognise that the targets to reduce carbon emissions in Scotland set out in the draft are challenging and that this will have a significant, possibly transformative, impact on the Scottish economy, but accept that this is necessary not just for Scotland but to support others around the world. It is difficult to see how the development of new fossil fuel resources in Scotland could be compatible with these targets.

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

On the whole, given that we consider it would be unwise to go ahead with fracking, we have no comments on the regulatory framework.

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?

Unconventional oil and gas development in Scotland may slow the decline of employment in fossil fuel industries in Scotland, but there are better options to create new employment. The potential of low carbon businesses in energy supply, heating and transportation to generate new jobs is clear and likely to be more sustainable than unconventional gas.⁴ For example the development of new district heating systems such as those being proposed in Glasgow by STAR Renewable Energy offers opportunities for significant new employment.⁵ The conversion of domestic and non-domestic properties to low carbon heating systems such as those being developed by STAR Renewable Energy would require a range of skills that could be developed in partnership with local agencies. We would encourage the Scottish Government to consider how retraining and reskilling could help support a 'just transition' to a low carbon economy.

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?

As noted above, the report to General Assembly in 2015 identified a series of risks associated with fracking. Of these, the most important is prolonging our dependence on fossil fuels and slowing the transition to a low carbon economy.

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

Since the May 2015 General Assembly the context has changed. The Climate Change Agreement made at CoP21 in Paris, December 2015 set international targets to limit global warming that will require all governments to take action to reduce greenhouse gas emissions. The moratorium imposed by the Scottish Government has given time to reflect on this and other developments and for this reason we believe that the case against fracking has been strengthened.

⁴ Employment in low carbon and renewables up by more than a third, Scottish Business New Network, April 2017 <https://sbnn.co.uk/2017/04/07/employment-low-carbon-renewables-third/>

⁵ <https://beta.gov.scot/news/43m-for-low-carbon-infrastructure-projects/>