



Molly Scott Cato
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Unit 216
Brunswick Court
Brunswick Square
Bristol
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18 November 2015

To Secretary of State for Energy & Climate change

Dear Ms Rudd,

**Re: 14th Round of Onshore Oil and Gas Licence Applications
Onshore Hydraulic Fracturing (Protected Areas) Regulations 2015**

It did not go unnoticed that in August the Oil & Gas Authority published the 14th Round of Onshore Oil and Gas Licence Applications. Licenses were issued for 159 blocks, which could potentially see fracking across the UK, affecting many areas within our constituencies.

Alongside the publication of the licence blocks was a consultation on the **Habitats Regulations Assessments of 14th Onshore Oil and Gas Licensing**. The consultation sought comments on the Oil & Gas Authority's strategic plan-level Habitats Regulations Assessment (HRA) of blocks taken forward for consideration of award in 14th Onshore Oil and Gas Licensing Round.

There is concern that this consultation was issued during the summer recess, with a fairly short window for responses, to minimise the number of organisations and individuals that were able to respond and express their concern. In our view the timescales were too short to allow for full and meaningful public consultation.

Constituents have raised concerns that this assessment failed to recognise the full range of likely effects arising from activities associated with oil and gas exploitation. It is extremely concerning that some issues identified as high risk to people and the environment, in a report commissioned by the European Commission, have been completely ignored in the assessment¹. It is notable that crucial issues relating to water and water quality are omitted and these must be addressed to enable a full and proper assessment of potential impact.

¹ [AEA et al \(2012\), Support to the identification of potential risks for the environment and human health arising from hydrocarbons operations involving hydraulic fracturing. A report for the European Commission AEA/R/ED57281.](#)

Further, we are concerned that insufficient consideration has been given to the potential impacts of these proposals on nationally and internationally protected sites and species. This relates to both direct impacts and cumulative impacts as a result of other schemes in the pilot areas.

We agree with the findings of the House of Commons Environmental Audit Committee that it is vital that the precautionary principle is applied. European Union laws for the protection of nature are intended to be applied in a way that is precautionary. If there is a lack of certainty, then the benefit of the doubt goes to the protection of nature.²

We welcome the Government's recently announced consultation that takes a step in the right direction: towards banning fracking in England's most important places for wildlife, Sites of Special Scientific Interest, through licensing conditions (Surface Development Restrictions for Hydraulic Fracking 4.11.15). However, we still have major concerns with regard to the effectiveness of the **Onshore Hydraulic Fracturing (Protected Areas) Regulations 2015** to fully protect designated areas, human health and the wider natural environment.

For example, we question the rationale of allowing fracking under National Parks and AONBs horizontally below at 1,200 metres—just 200m deeper than the normal 1km limit. Since fracking would be a new industry in the UK, there is currently no known safe depth threshold. Therefore, fracking should not be allowed at any depth beneath the UK's most sensitive sites.

As you are aware, the Green Party does not believe that fracked gas should form part of the energy mix due to significant concerns about the potential environmental and health risks of this extraction technique - as well as the incompatibility of fracking with the UK's longstanding commitment to keeping climate change below 2 degrees. Instead, the Green Party advocates a complete transformation of the energy system away from fossil fuels to one based on a much more efficient use of energy supplied mainly by electricity from renewable sources.

We call for immediate due diligence in assessing the potential impacts of these oil and gas licence blocks in relation to the Habitats Regulations, not least because numerous sensitive sites could be impacted, including an assessment of cumulative impacts. We ask that Onshore Hydraulic Fracturing (Protected Areas) Regulations 2015 are amended to take account of environmental concerns raised.

Additionally, we would like confirmation that the monitoring and reporting regime will be undertaken by an independent body, not the fracking industry, and that the statutory authorities, in particular the Environment Agency, must be sufficiently resourced to undertake this work.

Unfortunately, the Government's energy policy appears to remain firmly stuck in the 20th century and driven by a desire to pander to the fossil fuel and nuclear industries rather than embrace the huge economic opportunities and environmental imperative of the global transition to renewables that is already underway. I would urge you to reconsider your approach and to ensure that the general public have further opportunities to give their views on this important issue.

² [Environmental Audit Committee](#)

Yours sincerely,



Molly Scott Cato
Green MEP for the South West



Jean Lambert
Green MEP for London



Caroline Lucas
Green MP for Brighton Pavilion



Keith Taylor
Green MEP for South East England