

Response from Paddy Reilly 11th May 2012

Question/ Proposal		Do you agree?		Comments
		Yes	No	
1.	Do you agree with the proposed scope of the Framework (as set out in Section 2)?	*		
2.	Do you agree with the proposed components of the Framework (as set out in Section 3)?	*		
3.	Do you agree with the strategic intent of the Framework (as set out in Section 4)?	*		
4.	Do you agree with the proposed high level requirements for demonstrating ALARP under the Framework (as set out in Section 5)?		*	
5.	Do you agree with the proposed Permissioning System and associated designated petroleum activities under the Framework (as set out in Section 6)?	*		
6.	Do you agree with the proposed Compliance Assurance System under the Framework (as set out in Section 7)?	*		
7.	Do you agree with the proposed Incident Notification and Investigation under the Framework (as set out in Section 8)?		*	

Regarding Fracking. The technology has not been invented yet to monitor in detail what is happening beneath the ground. Therefore the only reasonable way to reduce risk is not start until this technology is available.

8.2 4e. An application for suspension of petroleum activities? Surely safety must take priority, not the continuation of activities. Immediate suspension must be the standard.

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8.	Do you agree with the proposed Agreed Interfaces, Co-operation & Co-ordination with Regulatory Authorities component under the Framework (as set out in Section 9)?	*		
9.	Do you agree with the proposed Enforcement System under the Framework (as set out in Section 10)?		*	<p>Regarding fracking.</p> <ul style="list-style-type: none"> Anything less than complete restoration of the aquifer to its pre-contamination state is totally unacceptable. These people are here for the huge profits to be made from oil and gas, mere fines are just costs to be taken into consideration and passed on. Imprisonment of some company personnel will not hurt upper management or shareholders. They will have the funds and the legal personnel to argue a case through a succession of courts for years, maybe decades. <p>As a deterrent to unsafe practices these proposals are pathetic.</p>
10.	Do you agree with the proposals for safety reporting and published safety information under the Framework (as set out in Section 11)?	*		
11.	Do you agree with proposals for the continuous improvement process under the Framework (as set out in Section 12)?	*		

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