

**Tina Graham**

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**Subject:** Submission to Safety Case Guidelines Consultation  
**Attachments:** pseexports.pdf

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**From:** rahima sayer  
**Sent:** 21 December 2012 16:01  
**To:** Alice Hanly  
**Subject:** Fwd: Submission to Safety Case Guidelines Consultation

Safety Case Guidelines Guidance Document under the Petroleum Safety Framework

Dear Alice Hanley

The CER cannot ignore the growing body of evidence that hydraulic fracturing and shale gas recovery may be associated with adverse health risks through exposure to polluted air, water and soil.

I attach a letter signed by medical and scientific professionals in the United States to President Obama, urging him to hold off on moving forward on an extension of the process pending more scientific and epidemiologic information about the potential harm from fracking.

They draw attention to the need for credible science while highlighting that it would be irresponsible and potentially harmful to allow the continuation of fracking and its extension in the absence of well designed scientific studies in order to evaluate and understand the potential harm from fracking.

It is my belief that the Precautionary Principle must apply and the regulations of ALARP cannot be satisfied against the background of international concern, without a multi disciplinary approach and proper scientific assessment. A Health Impact Assessment of the process must form part of the Safety Case. To do otherwise would be unthinkable. This must be clearly identified in the guidelines and made an absolute requirement for the evaluation of the Safety Case.

Design of the Safety Case must incorporate proper scientific assessment and health impact assessments in order to protect human and animal health and the local environment. In the absence of such studies and requirements a sound scientific logic cannot be attributed to the Safety Case and the principles of ALARP established. This would place a serious question mark over what the courts indicated in their interpretation of ALARP.

In the case of fracking no international model for best practice has been established and while the terms of reference contained in the consultation documents are broad based, they are largely influenced by the conventional petroleum industry and what is required here is a dedicated and prescriptive model solely designed to address the implications of hydraulic fracturing including a descriptive risk assessment.

In the case of fracking the initiatives and requirements must be laid down by the CER and on that basis what is tolerable risk can be established. As the Safety Act requires the public must have the assurance that the regulations are sound and robust.

I ask that you give consideration to these points.

Thank you

Kind regards

Rahima Sayer



The President  
The White House  
1600 Pennsylvania Avenue N.W.  
Washington, DC 20500

December 13, 2012

Dear Mr. President,

We the undersigned medical and scientific professionals urge the Obama Administration to put a hold on moving forward on the construction of new liquefied natural gas (LNG) terminals for the large-scale exportation of shale gas to foreign nations. Our concern is that the Administration has not fully examined the potential for harm to health and the environment that could result.

There is a growing body of evidence that unconventional natural gas extraction from shale (also known as 'fracking') may be associated with adverse health risks through exposure to polluted air, water, and soil. Public health researchers and medical professionals question the continuation of current levels of fracking without a full scientific understanding of the health implications. The opening of LNG export facilities would serve to accelerate fracking in the United States in absence of sound scientific assessment, placing policy before health.

As the White House and the Department of Energy contemplate exporting LNG to accommodate international demand for energy, the need for a deliberative process based on sound science is all the more important. We assert that a guiding ethical principle for public policy on fracking should parallel that used by physicians: "First, do not harm."

There is a need for much more scientific and epidemiologic information about the potential for harm from fracking. To facilitate a rapid increase in fracking in the United States without credible science is irresponsible and could potentially cause undue harm to many Americans.

Without well-designed scientific studies, we will not know the extent of potential harm from fracking. We strongly urge the Administration to err on the side of caution as it contemplates national policy regarding the exportation of shale gas.

The health professionals below sign as individuals and do not necessarily represent the views of their employer.

Sincerely,

Adam Law, MD  
Physicians Scientists & Engineers for Healthy Energy  
Cayuga Medical Center  
Weill Cornell Medical College

Seth Shonkoff, PhD, MPH  
Physicians Scientists & Engineers for Healthy Energy  
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**And 108 other health professionals, listed below.**



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