



Mayor Rob Small
PO Box 516
Amherst NS
B4H 4A1
rsmall@amherst.ca

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Dear Mayor Rob Small,

Congratulations!! We were excited to learn that your Council decided to abandon the proposal to discharge fracking wastewater through the wastewater system in the Tantramar Marsh, based on the division it was creating in the community.

This proposal would have seen the discharge of fracking wastewater into the LaPlanche River and consequently into the Bay of Fundy.

It is still important to understand that while Atlantic Industrial Services (AIS) has completed some testing on the fracking wastewater, fracking fluid is a complex mixture of chemicals of poorly understood and variable composition. Media reports note that you believe the test results “are accurate and have been completed by credible laboratories” and that the town would have completed its own independent testing. However, governments and the scientific community currently lack the analytical capabilities to detect all the chemical components, and do not have a solid scientific understanding of the fate and toxicity of many of them. The Council of Canadian Academies’ recent report, *Environmental Impacts of Shale Gas Extraction in Canada*, clearly outlined the lack of information on many key issues including fracking chemicals.

Reactive components of fracking fluid will be transformed to other chemical products upon contact with water and/or sediments. Further, organisms can biotransform some chemicals in their guts or livers. Depending on the chemical, transformation can either decrease or increase their bioavailability and toxicity.

Low aqueous concentrations of certain contaminants are still a concern because they can bioaccumulate in aquatic biota and biomagnify in aquatic food webs to high concentrations that may pose risks for health of humans as well as marine and terrestrial wildlife.

This danger to fish populations in the Bay of Fundy would have dire coastal health and economic implications should contamination occur.

Research by the U.S. Environmental Protection Agency and the U.S. Endocrine Disruption Exchange Inc. has demonstrated that fracking fluids contain toxic substances known to cause serious health impacts such as cancer and organ damage, and have negative impacts on neurological, reproductive and endocrine systems. Under the Chemicals Management Plan (CMP), Environment Canada reviewed chemicals used in the fracking process in both Quebec and the U.S. Approximately half of the fracking chemicals did not meet the CMP criteria for further investigation, meaning these chemicals have not been assessed for potential risks to the public.

And while immediate effects may not always be detected, Professor of Engineering Tony Ingraffea from Cornell University notes that the effects of fracking are cumulative. So although communities may not see immediate impacts on their drinking water, communities will see the effects of fracking in 10 or more years.

AIS based its testing on several standards including Health Canada's Guidelines for Canadian Drinking Water Quality. However, Ecojustice's recent report *Waterproof: Standards* found that Canada's standards continue to be below international benchmarks and are at risk of further falling behind.

The problem of fracking wastewater is a critical reason that communities around the world are calling for a ban on fracking. We commend the Nova Scotia government for banning the importation of fracking waste into Nova Scotia and more recently moving forward with a legislated ban on fracking in the province. We also commend your decision to postpone the discussion until Nova Scotia Environment holds a public consultation.

In addition to Nova Scotia Environment's approval, this matter also falls under federal jurisdiction, as releasing contaminants to aquatic environments is regulated by the Fisheries Act. Environment Canada and Fisheries and Oceans' should have also investigated and approved this plan.

We recognize the existence of tailings ponds at the AIS facility in Debert. That said, we do not wish for Amherst or any community along with downstream communities to become a testing ground for the long-term implications of what we are being assured today is treated fracking waste.

Environment Canada has recognized Amherst for its exemplary source water protection plan, which takes a multi-barrier approach including keeping water clean and safe, and proving it is

safe. Given the lack of understanding of the impacts of fracking chemicals, and a desire we are certain you share to protect water sources, public health and the surrounding ecosystem, we congratulate you on hearing the concerns raised by people in your community and ultimately on your decision in this matter, which could have set a dangerous precedent for communities across the country and generations to come.

Respectfully,



Angela Giles
Atlantic Regional Organizer
Council of Canadians



Emma Lui
Water Campaigner
Council of Canadians



Tori Ball
Atlantic Organizing Assistant
Council of Canadians

- c.c. Councillor, Frank Balcom
Councillor, Robert Bird
Councillor, David March
Councillor, Lisa Emery
Councillor, George Baker
Councillor, Terry Rhindress
Randy Delorey, Nova Scotia Minister of Environment

The Council of Canadians is Canada's largest member-based advocacy organization with tens of thousands of members and over 70 community-based chapters across the country. We are a social justice organization and address environmental issues through an environmental justice perspective.