

# **FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION**

*(Incorporating Fish Hoek, Clovelly and Sun Valley)*

~~65B Central Circle, Fish Hoek 7975~~

Web: <https://www.fhvrta.org.za/> Facebook: [www.facebook.com/FHVRRA/](https://www.facebook.com/FHVRRA/)

Heritage Western Cape: Conservation Body

**TO: THE DEPARTMENT OF FORESTRY, FISHERIES AND THE  
ENVIRONMENT**

**DR. DEE FISCHER AT: [dfischer@dffe.gov.za](mailto:dfischer@dffe.gov.za)**

**SUBJECT: COMMENTS ON THE PROPOSED REGULATION PERTAINING TO THE  
EXPLORATION AND PRODUCTION OF ONSHORE OIL AND GAS  
REQUIRING HYDRAULIC FRACTURING <sup>1</sup>**

**DUE DATE: 22 - 25 AUGUST 2022**

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The Fish Hoek Ratepayers and Residents Association (FHVRRA) comments in terms of the National Environmental Management Act. We should take from lessons learned internationally about community problems caused by fracking, including frack sites breaking down causing a decline in property values and losses in local tourism. One really needs to consider if the gains outweigh the losses.

At a bare minimum, we would want Section 4's Prohibited Activities (c) (iii) underground discharge of fracking fluids closely monitored for toxicity and their environmental obligation in Section 6 (a), Section 14 (4) and Section 19 (3). Surely a government environmentalist should be responsible for a "no-go" decision wherein the contemplated chemicals are too toxic or take too long to breakdown before drilling commences.

Section 5's prohibited areas for fracking should include within 2 kilometers of any municipal aquifer. Aquifers are typically deeper than ground water, but more accessible to fracking chemicals.

Section 7 (9) monitoring results must be conducted by an independent agency.

In an arid country, fracking seems a wasteful use of a scarce resource, water. Fracking requires a massive amount of water, which is typically lost for re-use. In any case, one wouldn't want the chemical cocktail used in fracking to be found in their drinking water and there are many global reports of water contamination caused by fracking activities, even flammable.<sup>2</sup> Often, the actual chemicals used in fracking are not disclosed, but should be (veracity of Section 14 (4) compliance should be tested). Fracking activities, including the release of methane, also pollute the air making this a "non-green" activity. To this end, we'd like to see the results of before, during and post testing of surface atmosphere for methane levels in and around (width of horizontal pipe pressure field) drill sites.

Health issues arising from fracking activities include neurological effects, skin rash or irritation, nausea or vomiting, abdominal pain, breathing difficulties or cough, nosebleeds, anxiety, headache, dizziness, elevated crystalline silica exposure and eye and throat irritation in people and farm animals. Those living in close proximity to fracking well pads

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<sup>1</sup> <https://www.gov.za/documents/national-environmental-management-act-proposed-regulations-pertaining-exploration-and>

<sup>2</sup> <https://celdf.org/fracking/>

have been linked to low birth weight, congenital heart defects and neural-tube defects.

If given the choice, most of us would rather live a long, healthy life, albeit poorer, than a shorter, unhealthy short-term prosperous life. There seems to be a poor correlation between reported global life expectancy and various personal experiences where relatives are living abroad, but they are experiencing reduced lifespans.

We'd like to be informed of the Section 19 website links.

The penalties proposed in Section 24 are probably too lenient for the known chancers in this field.

Appendix 2 (1) (m) seismic events are interesting as cracking the substrate foundations may take awhile before causing collapse and these are expected events. Again, we are not convinced that the gain is worth the cost. It is these fracking caused seismic events that are causing an international decline in these sites' property values.

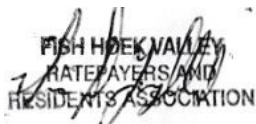
Appendix 3 (1) (e) the independent environmental control officer must have "control" authority and not just be an admin paper pusher as contained in this section. That control being the authority to stop operations when breaches or requisite paperwork is not being produced timeously to their satisfaction or the toxic risks are too high.

## SUMMARY

In conclusion, FHVVRA recommends that:

- The independent environmental control officer must be given "no-go" control authority when monitoring the chemicals results conducted by an independent agency;
- Section 5 to include "within 2 kilometers of any municipal aquifer";
- More stringent penalties in Section 24; and
- A copy of Section 19's requisite websites be made available to us including measured surface level of methane around the drill sites.

We conclude that the risks far outweigh the rewards when one factors in the associated degrading of health. We'd wish for no fracking.

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