



Michael Shanks MP, Minister of State for Energy
Department of Energy Security and Net Zero
Ministerial Correspondence Team
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United Kingdom

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Dear Minister Shanks

re. Westminster Hall debate on small-scale fracking

I write on behalf of the Steering Group of Frack Free Coastal Communities.

We watched with interest the Westminster Hall debate on 10th December to see if there would be a clear statement of government intentions on the scope of the promised legislation to ban fracking. Your response to the debate was clear: under current plans, the legislation will not ban small-scale, or low-volume, fracking for oil and gas development.

You said that you “do not discount for a second” communities’ concerns and that you want to hear those concerns from across the country; that you remain open-minded, but that policy must be based on objective evidence. In response to that invitation, we are writing to express our deep concern over two elements in your contribution to the debate: the use of the word ‘fracking’ and the evidence of risk associated with low volume hydraulic fracturing.

1. Language and definition

We were surprised that you chose to imply that the term ‘fracking’ applies only to the high volume hydraulic fracturing for shale gas that is covered by the moratorium and not to lower volume fracking such as “proppant squeeze”. The only people who continue to insist on this fiction are those oil and gas executives who hope it will provide cover for them when they argue that what they propose to do is not ‘fracking’ and will therefore not, by definition, be outlawed by any ban on ‘fracking’.

The weight of legal and scientific opinion, as has been widely reported in recent months, backed up by the lexicographers of the Oxford English Dictionary, comes down firmly on the view that ‘fracking’ refers to all hydraulic fracturing in any rock formation (not just shale), whatever the volume of fluid and proppants and chemicals used. The OED points out that ‘frack’ and ‘fracking’ are simply abbreviations for ‘fracture’ and ‘fracturing’.

Indeed, the company behind proposals to drill and hydraulically fracture for gas at Burniston on North Yorkshire’s Heritage Coast, Europa Oil and Gas, has itself admitted describing its proposed ‘proppant squeeze’ operation as ‘fracking’ in 2024 correspondence with the NSTA in the run up to their submission of a planning application.

When the Secretary of State said at the Labour Party Conference that he would introduce legislation to ban fracking for onshore oil and gas, the reasonable interpretation of that commitment was that such a ban would include all fracking, irrespective of volume. We expect the government to honour that commitment.

2. Evidence base

In justifying your position that there are no plans, at this time, to extend the fracking ban to low-volume hydraulic fracturing, you said that “the evidence base is not there at the moment to suggest that low-volume hydraulic fracturing activities have the same associated risks as fracking for shale gas”. Yet in your remarks you made no reference to two clear pieces of objective evidence presented by Alison Hume MP in her opening speech in the debate.

First, the hydraulic fracturing at Preston New Road in Lancashire that precipitated the earthquakes that led to the moratorium in 2019 used volumes of fluid well below the threshold for associated (high volume) hydraulic fracturing set out in the Petroleum Act 1998 (as amended by the Infrastructure Act 2015) and the 2019 moratorium. Indeed, the amount of fluid used was below the volume that Europa Oil and Gas propose to use in their hydraulic fracturing operations at Burniston if they receive planning and regulatory approval. The Lancashire operation was therefore *de facto* low volume hydraulic fracturing and could still have gone ahead even had the moratorium been in place at the time. That operation demonstrably caused harm including the objectively recorded seismicity and damage to buildings, reports of mental health impacts of the resulting anxiety and an abandoned site that, six years on, the company responsible shows no intention of restoring in accordance with its obligations. With hindsight, the risks of this low volume fracking are self-evident.

Second, research commissioned by the Oil and Gas Authority (now NSTA) in the wake of the Lancashire earthquakes concluded that it is not possible to predict the seismic response to hydraulic fracturing in relation to site characteristics, fluid volume, rate or pressure; and that where induced seismicity has occurred, mitigation measures have shown only limited success¹.

Taken together, this evidence shows that low volume hydraulic fracturing has caused harm and that it is not possible to predict or effectively mitigate against the risk of such harm in other contexts.

No one is carrying out research on the safety or risks of low volume hydraulic fracturing. It seems to us that the oil and gas industry, and indeed any regulator that permits it to go ahead, is content to treat local communities up and down the country as guinea pigs in an uncontrolled experiment. In Burniston, Cloughton and Scalby – and many other locations in the country – by the time this experiment yields any objective evidence, irreparable damage may have been done.

In conclusion, we would respectfully ask you to reconsider your use of language around fracking to make it clear that you accept that the term ‘fracking’ applies to all hydraulic fracturing operations; and to reconsider your view about the scope of the legislation to ban fracking in light of the evidence referred to above.

Yours sincerely,



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¹ Summary report of the scientific analysis of the data gathered from Cuadrilla’s PNR2 hydraulic fracturing operations at Preston New Road. <https://www.nstaauthority.co.uk/media/6970/oga-summary-of-pnr2-studies-final.pdf>