



October 22, 2026

The Honourable Susan Holt
Premier of New Brunswick
Government of New Brunswick

Dear Premier Holt:

Subject: Opposition to lifting the fracking moratorium and requests for a credible public review

On behalf of the Conservation Council of New Brunswick, I am writing to express our opposition to lifting or weakening the province's moratorium on hydraulic fracturing. We recognize the economic pressures facing New Brunswick and your government's responsibility to explore opportunities. However, economic development must protect the health of our communities, the natural environment, and the interests of future generations. Healthy environments are the foundation of thriving communities and prosperous economies.

Protecting water, nature, and community health

Our concerns include risks to groundwater and surface water, air pollution, wastewater management, habitat loss, and the cumulative effects of industrial development. Potential health impacts and the long-term responsibility for abandoned wells and contaminated sites also require careful scrutiny. These concerns cannot be addressed simply by pointing to technological improvements or promising strong regulation. Your government must demonstrate what risks would remain, how compliance would be enforced, and who would pay when problems occur.

Considering all relevant evidence and applying precaution

The review must consider relevant research from other parts of Canada and the United States where hydraulic fracturing occurs. A lack of New Brunswick-specific evidence of harm does not establish that an activity is safe, nor does it justify discounting findings from elsewhere.

Differences in geology, practices, and community circumstances should inform how studies are assessed, rather than serve as a blanket reason to dismiss them.

We are concerned that an overly narrow focus on New Brunswick evidence could exclude important research and favour a conclusion that supports lifting the moratorium. The review must assess evidence of risks as rigorously as claims of benefits. It must also apply the precautionary principle: where there is a risk of serious or irreversible harm, scientific uncertainty should not be used to justify delaying protective measures. The burden should be on demonstrating that changing the moratorium is justified, rather than requiring New Brunswick communities to experience harm before their concerns are accepted.

Accounting for emissions and climate change

Expanding fracked gas development would add sources of greenhouse gas emissions, including methane released during production and handling and carbon dioxide produced when the gas is burned. Methane is a powerful greenhouse gas, making leaks and other releases a significant concern. An assessment focused only on well-site emissions would miss the full climate implications of development.

Your government should assess emissions across the entire life cycle, including drilling, processing, transportation, and final use, whether the gas is consumed in New Brunswick or elsewhere. Any claim that expanded gas production would reduce global emissions should be independently tested, with its assumptions and uncertainties made public.

Developing new gas infrastructure also risks committing capital and communities to fossil fuel production for decades, making future emissions reductions more difficult and potentially leaving stranded assets and cleanup liabilities. The review must explain how expanded production would align with provincial and national climate commitments and account for the costs that climate change imposes on communities, infrastructure, ecosystems, and public services.

Examining who benefits and who pays

The local economic benefits deserve much closer examination. Company revenues and investment announcements do not establish that New Brunswick families and communities would be better off. There is no guarantee that gas produced here would mean lower energy bills here. We are concerned about a development model in which companies capture the profits while communities carry environmental risks, infrastructure pressures, and long-term liabilities.

Strong rules also require adequate staffing, independent monitoring, inspections, and enforcement. The economic assessment must include the costs of these responsibilities, along with credible financial safeguards that ensure companies remain responsible for closure, cleanup, and long-term liabilities, even if they become insolvent.

Considering better opportunities for lasting prosperity

We believe New Brunswick has better opportunities to build lasting prosperity by investing in nature, tourism, and the care economy. Protecting and restoring forests, rivers, and coastal waters supports livelihoods, outdoor recreation, and the natural places that draw visitors and make people want to live here. Investments in health care, child care, elder care, and community services create needed employment, help people participate in the workforce, and improve daily life for families. These opportunities, alongside energy efficiency and renewable electricity, deserve serious consideration as foundations for our economic future.

Choosing to expand fracking carries opportunity costs. Public money, skilled workers, infrastructure, and government attention committed to gas development are resources unavailable for other priorities. Industrial activity could also undermine investments in tourism, recreation, and businesses that depend on clean water, healthy landscapes, and New Brunswick's reputation as a place to experience nature. We need to ask what other opportunities could be delayed, displaced, or lost, and whether a different approach would deliver greater and more widely shared benefits over the long term.

Addressing the survey's limitations

We are concerned that the government's survey is inadequate for a decision of this significance. In our assessment, its framing does not give people sufficient scope to question the underlying case for expanded gas development or to explain why they support maintaining the moratorium. Demographic and sector questions also raise concerns that some responses could be weighted more heavily than others. Your government should explain how it will analyze responses and ensure it does not discount residents' concerns because they lack industry connections or technical expertise or because they care about protecting the health of their family, community and environment.

A survey can collect responses, but it cannot substitute for meaningful engagement. People need opportunities to ask questions, hear independent evidence, challenge assumptions, and receive answers. Technical language, limited background information, internet access, literacy, disability, time pressures, and uncertainty about how responses will be used can all prevent

participation. People should not need specialist knowledge to have a meaningful voice in decisions affecting their communities.

Our requests for an honest, trustworthy, and comprehensive review

Our position is clear: we oppose lifting or weakening the fracking moratorium. If your government is truly committed to an honest, trustworthy, and comprehensive review, it must be willing to examine whether expanded gas development serves the public interest at all, and accept that the evidence may support keeping the moratorium in place.

The burden of proof rests with the case for changing this protection. The review should explain what has changed since the moratorium was established, explicitly assess the original conditions for lifting it, and demonstrate whether and how each has been met. Promises of future safeguards should not be treated as evidence that these conditions have been satisfied.

To establish the credibility and legitimacy of that review, we ask your government to:

1. Provide meaningful and accessible public engagement. Offer opportunities beyond the survey, including accessible sessions in both official languages, community meetings, independent expert presentations with public questions, and options to participate by telephone, mail, and written submission. Allow sufficient time for people to review the evidence and respond. Explain how public input will influence the decision and how survey responses will be analyzed and weighted. Engagement with Indigenous Nations must respect their rights and the Crown's consultation obligations.
2. Commission full-cost accounting and a fair comparison of alternatives. Assess environmental and health costs, life-cycle greenhouse gas emissions and associated climate costs, public infrastructure expenses, potential subsidies, cleanup liabilities, and effects on existing livelihoods. Include the full cost of independent baseline monitoring, inspections, enforcement, emergency response, well closure, and long-term monitoring. Assess whether government has the capacity and resources to fulfil these responsibilities, and explain how companies would provide sufficient financial security to prevent costs from falling to the public, including in the event of bankruptcy.
3. Compare expanded development with maintaining the moratorium and investing in other opportunities. Examine what New Brunswick would forgo by directing public money, labour, infrastructure, and government attention toward gas development. Compare those investments with nature conservation and restoration, tourism, health care, child care, elder care, energy efficiency, and renewable electricity. Consider lasting

employment, benefits retained locally, quality of life, resilience, and costs and benefits across generations.

4. Subject the government's work to independent scrutiny. Commission qualified experts without financial interests in expanded gas development to assess the evidence, methods, assumptions, and conclusions underpinning the review, including the assessment of the original conditions for lifting the moratorium. Their mandate should cover environmental, health, climate, economic, and cumulative impacts, as well as the comparison of alternatives. Include public health professionals with expertise in cumulative exposure, mental health, community well-being, and disproportionate impacts on children and other vulnerable populations. Disclose the selection process, funding arrangements, and any conflicts of interest.
5. Make the evidence and decision-making process transparent. Publish the review's terms of reference, studies, data, funding sources, economic assumptions, and survey methodology. Clearly identify uncertainties and gaps in the evidence. Release the independent assessment and a draft government report for public comment before a decision is made, while protecting participants' personal information. Explain how the final decision responds to the evidence, public concerns, and independent findings.

Next steps

New Brunswickers deserve a process they can trust and an economic vision that protects the places, services, and livelihoods on which their well-being depends. Please confirm whether your government will commit to these requests and provide a clear timeline for additional engagement, publication of the evidence, and independent review.

Sincerely,



Beverly Gingras
Executive Director
Conservation Council of New Brunswick