



New York, September 24, 2013

Mr. Marc Pallemerts, UN Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes

Ms. Catarina de Albuquerque, UN Special Rapporteur on the human right to safe drinking water and sanitation

CC: Mr. John Knox, UN Independent Expert on human rights and the environment

The Right Honourable Stephen Harper, Prime Minister of Canada

The Honourable John Baird, Minister of Foreign Affairs

The Honourable Leona Aglukkaq, Minister, Environment Canada

Ambassador Guillermo E. Rishchynski, Canada's Permanent Representative to the United Nations

Mr. Daniel E. McDougall, Ambassador for Climate Change, Environment Canada

The Honourable Kathy Dunderdale, Premier of Newfoundland and Labrador

The Honourable Thomas J. Hedderson, NL Minister of Environment and Conservation and Minister Responsible for the Office of Climate Change, Energy Efficiency and Emissions Trading

Re: Human-Rights Implications of Fracking in Newfoundland and Labrador, Canada

Dear Mr. Pallemerts and Ms. Albuquerque:

We are writing to convey our serious concerns for the threat to human rights and the environment posed by the potential authorization of hydraulic fracturing (fracking) for oil and gas exploration and development on the west coast of Newfoundland and Labrador, Canada.

The joint federal-provincial Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB) is considering a project description and scoping document for exploratory drilling by Shoal Point Energy Ltd. and Black Spruce Exploration Corp. The proposed activity is vertical drilling onshore and horizontal drilling offshore under the Gulf of St. Lawrence in the Port au



Port/St. George's Bay Area, Sally's Cove, Lark Harbour, and several other communities along the west coast of Newfoundland.

Regulation of fracking would fall primarily within the competency of provincial authorities that issue drilling and water permits. However, the federal government has competency to regulate fracking through the National Pollutant Release Inventory as well as the Fisheries Act, the Species at Risk Act, and the Canadian Environmental Assessment Act.

In its capacity to oversee legislative and regulatory compliance in areas of safety, environmental protection, resource management, and industrial benefits, the joint federal-provincial C-NLOPB is currently updating its Strategic Environmental Assessment for the Western Newfoundland and Labrador offshore area. After public outcry, the initial short window of time for public comment has been extended to September 27, 2013.

In this context, we are raising our concerns with your mandates given your particular expertise and experience analyzing the risks associated with fracking¹ in light of States' international obligations to respect, protect, and fulfill human rights. We are concerned about violations throughout the process: from the right to information necessary to make well-informed decisions at every stage, to the violation of our right to water and health that we foresee based on recent reports where fracking has taken place over an extended period.

A. UNESCO's Response to Plans to Frack: Gros Morne National Park

The onshore-to-offshore project would include well sites in close proximity to Gros Morne National Park – a park that protects 1,805 square kilometers of western Newfoundland's coastal lowlands and Long Range Mountains and encircles several small communities. The United Nations Educational, Scientific and Cultural Organization (UNESCO) designated the park a World Heritage Site in 1987 based on two criteria:² first, its glacial and geographic importance to Earth's evolutionary history,³ and second because "Gros Morne National Park, an outstanding wilderness environment of spectacular landlocked, freshwater fjords and glacier-scoured headlands in an ocean setting, is an area of exceptional natural beauty."⁴

UNESCO's World Heritage Centre's reaction to the plans to frack near the Park signals to the severity of the threats posed to the natural environment by well drilling along the west coast of Newfoundland.

¹ E.g. Report of the Special Rapporteur on the human rights obligations related to environmentally sound management and disposal of hazardous substances and waste, Calin Georgescu, Human Rights and Extractive Industries, U.N. Doc. A/HRC/21/48 (July 2, 2012), paras. 8, 14; Report of the Special Rapporteur on the human right to safe drinking water and sanitation, Catarina de Albuquerque, Mission to the United States of America, U.N. Doc. A/HRC/18/33/Add.4 (Aug. 2, 2011), paras. 41-46.

² World Heritage Nomination—IUCN Summary, 418: Gros Morne National Park (Canada) (1987), p. 20, available at: http://whc.unesco.org/archive/advisory_body_evaluation/419.pdf.

³ "The rocks of Gros Morne National Park collectively present an internationally significant illustration of the process of continental drift along the eastern coast of North America and contribute greatly to the body of knowledge and understanding of plate tectonics and the geological evolution of ancient mountain belts. In glacier-scoured highlands and spectacular fjords, glaciation has made visible the park's many geological features." UNESCO Description: Gros Morne National Park, <http://whc.unesco.org/en/list/419/>.

⁴ Id.



Following a series of communications with the Canadian government, the World Heritage Centre (WHC) and International Union for Conservation of Nature (IUCN) concluded with serious concern that “plans to drill and hydraulically fracture (frack) three onshore-to-offshore test wells in the immediate vicinity of the property could impact the Outstanding Universal Value and in particular the integrity of the property as a result of pollution, industrial infrastructure and shocks to geological formations.”⁵

The WHC urged Canada to complete the Environmental Impact Assessment process to review the potential impacts and to submit a copy of the EIA to the World Heritage Centre prior to making any decisions that would be difficult to reverse. Namely, the assessment should focus on “possible impacts of drilling and hydraulic fracturing activities, such as offshore leakage reaching the property, pollutants affecting pristine lakes on the property, and the risk of rock fall from high cliffs caused by shocks during hydraulic fracturing, including areas of the property with high visitation.”⁶

Finally, the WHC requested that Canada invite a joint World Heritage Centre/IUCN reactive monitoring mission to the property to assess these risks and submit an updated report before February 1, 2014, for consideration by the World Heritage Committee at its 38th Session in 2014.⁷

B. Rights Vulnerable from Environmental Harm: Health, Water, Livelihood, Culture

The major human-rights concerns regarding the impacts of fracking in western Newfoundland relate to consequences on peoples’ health from soil, air, water, and food-chain contamination and the loss of sustainable sources of employment related to tourism and fishing.

The impacts of fracking are being increasingly raised before the United Nations human rights mechanisms: Special Rapporteur Mr. James Anaya recently referred to “the particularly risky method of hydraulic fracturing”⁸ and this year the Committee on the Elimination of Racial Discrimination cited its concern over drilling and hydraulic fracturing concessions “under circumstances that may threaten these communities’ enjoyment of their rights to land and resources traditionally owned or used.”⁹ The two most extensive discussions in the UN system of the human-rights implications of this extractive method come from recent studies from your mandates.¹⁰

⁵ UNESCO, State of conservation of World Heritage properties inscribed on the World Heritage List, Decision 37 COM 7B.18, U.N. Doc. WHC-13/37.COM/7B.Add (May 17, 2013), p. 51, available at: <http://whc.unesco.org/archive/2013/whc13-37com-7B-Add-en.pdf>.

⁶ Id.

⁷ Id. at 51-52.

⁸ Report of the Special Rapporteur on the rights of indigenous peoples on the situation of indigenous peoples in Argentina, UN Doc. A/HRC/21/47/Add.2 (July 4, 2012), para. 43 (in reference to the Kaxipayiñ community in Argentina).

⁹ Committee on the Elimination of Racial Discrimination, Concluding observations on the eighteenth to the twentieth periodic reports of New Zealand, adopted by the Committee at its eighty-second session (11 February–1 March 2013), CERD/C/NZL/CO/18-20 (Apr. 17, 2013), para. 18

¹⁰ Report of the Special Rapporteur on the human rights obligations related to environmentally sound management and disposal of hazardous substances and waste, Calin Georgescu, Human Rights and Extractive Industries, U.N.



Fracking in its current form is a new practice that warrants caution.¹¹ The particularly unique characteristics of the west coast of Newfoundland is even more unfamiliar terrain. Shoal Point Energy past President George Langdon has admitted that the shale at Green Point is “a bit of a wild frontier still.”¹² A representative of the consulting firm hired by Shoal Point to evaluate Green Point’s potential asserted that “we’re really kind of pioneering something really brand new here.”¹³ The kind of shale rock, is several times thicker than other deposits in North America and has been broken up by moving tectonic plates. All assessments suggest this will make it more difficult to drill. As has been widely documented: “Health and environmental risks of hazardous substances used extensively are generally discovered in hindsight, when the substances have already become widespread in the environment in large quantities and are having adverse effects on the enjoyment of human rights or on the state of ecosystems.”¹⁴ Given these circumstances, the precautionary principle must be applied.

Water is the resource that is most vulnerable to degradation in terms of both quantity¹⁵ and quality from the hazardous substances and waste of extractive industries.¹⁶ Guarantee of the human right to water refers to water that is “free from micro-organisms, chemical substances and radiological hazards that constitute a threat to a person’s health.”¹⁷

A major concern of the citizens of Newfoundland and Labrador is the location and means of disposing the spent fracking fluid after the drilling operation. “Toxic substances in fracking fluids and resulting mud can be released into the surface water during the extraction, transport, storage, and waste disposal stages. The storage of wastewater and other waste products may

Doc. A/HRC/21/48 (July 2, 2012), paras. 8, 14; Report of the Special Rapporteur on the human right to safe drinking water and sanitation, Catarina de Albuquerque, Mission to the United States of America, U.N. Doc. A/HRC/18/33/Add.4 (Aug. 2, 2011), paras. 41-46

¹¹ UN Economic Commission for Europe, Report of the Task Force on Public Participation in Decision-making on its third meeting, Public Participation in Decision-making and Access to Justice in Environmental Matters, UN Doc. ECE/MP.PP/WG.1/2013/4 (Apr. 4, 2013), para. 63 (Public participation regarding marine-related decision-making in Ireland: “experiences with public participation in the context of SEA would likely differ depending on whether the decision-making concerned existing types of activities (such as aquaculture or erosion control) or new types of activities (such as offshore energy or fracking). With respect to existing types of activities, the public and the Government might bring considerable baggage to the process, and there might be existing trust or distrust. With respect to new types of activities, new options and perspectives could be put forward; however, there might also be concern about the unknown.”).

¹² Lauren Krugel, Canadian Press, Is Newfoundland home to Canada’s next big oil find?, Financial Post, Sept. 11, 2012, http://business.financialpost.com/2012/09/11/is-newfoundland-home-to-canadas-next-big-oil-find/?_lsa=c101-f62e.

¹³ Id.

¹⁴ Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes, Mr. Marc Pallemmaerts, UN Doc. A/HRC/24/39 (Aug. 13, 2013), para. 31.

¹⁵ “[D]ue to their use and production of hazardous substances and wastes, extraction industries require massive amounts of water, which can permanently remove billions of gallons of water from the earth’s hydrological cycle. This may infringe on the human right to water by undermining the availability of a sufficient and continuous water supply for personal and domestic uses.” Report of the Special Rapporteur on the human rights obligations related to environmentally sound management and disposal of hazardous substances and waste, Calin Georgescu, U.N. Doc. A/HRC/21/48 (July 2, 2012), para. 40.

¹⁶ Id. para. 39.

¹⁷ Committee on Economic, Social and Cultural Rights, General Comment No. 15 (2002), para 12(b).



result in further contamination of water supplies due to spills, leaks and/or floods. These unintended releases can reasonably be expected to increase following the anticipated increase in the frequency and intensity of storms in the future, due to climate change.”¹⁸ Penn State University research indicates that spent fluid from wells in Pennsylvania and Northern Virginia have been found to contain a brine laden with dangerous elements locked beneath the surface of the earth since the Paleozoic era and which, when mixed with elements like barium and radium, could result in costly new regulations for the transportation and disposal of fracking fluid.¹⁹

In addition to threats from hazardous substances and waste, water scarcity caused by hydraulic fracturing is of great concern to the citizens of Newfoundland and Labrador. Water scarcity has been recognized as a major challenge to sustainability and the provision of water and sanitation in your most recent report.²⁰ “Since the overall demand for water from all sectors exceeds availability, prioritization of uses becomes all the more important.... Water and sanitation must be provided in a way that respects the natural environment; finite resources must be protected and overexploitation cannot occur.”²¹ In a study of water use in hydraulic fracturing operations across the United States, Ceres found that “almost half (47 percent) of shale gas and tight oil wells are being developed in regions with high to extremely high water stress.”²²

Two important sources of sustainable employment in this part of the province, fisheries and tourism, would be put at risk by the government’s decision to permit fracking. For generations, many who live along the coast of western Newfoundland have depended on fishery for their livelihood. A recent study by the U.S. Geological Survey and the U.S. Fish and Wildlife Service speaks to the severity of this threat, noting that “hydraulic fracturing fluids are believed to be the cause of the widespread death or distress of aquatic species in Kentucky’s Acorn Fork, after spilling from nearby natural gas well sites.”²³

The loss of world heritage status for Gros Morne Park would be a significant loss for the tourism sector and all of the people that depend on it for their livelihood. However, the greatest negative impact to these jobs would stem from the same factors leading to the revocation of the UNESCO designation. From an extensive literature review and survey, Dr. Edwin Bezzina identifies that

¹⁸ Report of the Special Rapporteur on the human rights obligations related to environmentally sound management and disposal of hazardous substances and waste, Calin Georgescu, U.N. Doc. A/HRC/21/48 (July 2, 2012), para. 14. Where regulation has been poorly designed or weakly enforced, serious abuses in the disposal of produced water have been documented. “The excess water from oil or gas production (produced water) and drilling fluids constituted hazardous wastes and are sometimes re-injected into the reservoir. In some countries where the practice is not banned, produced water is disposed of in waste ponds, which may not be lined with impermeable barriers, or even dumped directly into streams or oceans.” *Id.* para 8.

¹⁹ Analysis of Marcellus Flowback Finds High Levels of Ancient Brines. A paper by Lara O. Haluszczak, a Penn State student who has since graduated; professor emeritus Arthur W. Rose; and Lee R. Kump, professor and head of the Department of Geosciences, detailing those findings has been accepted for publication in *Applied Geochemistry*, the journal of the International Association of Geochemistry at <http://www.sciencedaily.com/releases/2012/12/121218203537.htm>

²⁰ Report of the Special Rapporteur on the human right to safe drinking water and sanitation, Catarina de Albuquerque, U. N. Doc. A/HRC/24/44 (July 11, 2013)

²¹ *Id.*

²² Hydraulic Fracturing and Water Stress: Growing Competitive Pressures for Water, May 2013, Ceres at <http://www.ceres.org/press/press-clips/fracking-can-strain-u.s.-water-supplies>

²³ U.S. Fish & Wildlife Service: Hydraulic Fracturing Fluids Likely Harmed Threatened Kentucky Fish Species August 28, 2013 at <http://www.fws.gov/southeast/news/2013/053.html>



the loss in livelihood generated from employment in the tourism field would result from eight foreseeable consequences of fracking in the region: air pollution, noise pollution, heavy truck traffic, visual impact, seismic activity, disposal of hazardous fracking chemicals, climate change, and damage to visitor perceptions and tourism brand in western Newfoundland.²⁴

“As recognized in international human rights law, access to water that is free from hazardous substances is not only essential for human health (the right to health) and ensuring livelihoods (right to gain a living from work), but also for the enjoyment of certain cultural practices (right to take part in cultural life), as is often the case for coastal communities and indigenous peoples.”²⁵

C. Fundamental Procedural Human Rights for Environmental Policymaking²⁶

Finally, we recall that “environmental issues are best handled with participation of all concerned citizens.” On this principle the Rio Declaration on Environment and Development established that “each individual shall have appropriate access to information concerning the environment that is held by public authorities, including information on hazardous materials and activities in their communities, and the opportunity to participate in decision-making processes.”²⁷

A primary concern in this region is the veracity, completeness, and transparency of information regarding the chemicals proposed to be used, measures to guarantee safety, location and method of disposal, etc. After extensive research of the accessible information on the social, health, occupational and environmental effects of high-pressure slickwater hydraulic fracking, the local Port au Port/Bay St. George Fracking Awareness Group concluded that without sufficient scientific data, sound environmental policy, or updated regulations to challenge these new technologies, and with so much uncertainty and contradictory information around local questions related to this new extractive method, it is imperative that the government declare a moratorium. This action would allow time for further study and research to gain a more comprehensive understanding of this new method of extraction and to evaluate whether or not the positive impacts for the area outweigh the grave risks involved in this industry. To proceed without this expert information could easily force government to rely exclusively on the advice of industry.

The oil and gas industry is not required to disclose, even to Health Canada according to former Commissioner of the Environment Scott Vaughan, the toxins used in the process.²⁸ “Given the central role of natural resources in Canada’s economy”, he said, “it is critical that environmental

²⁴ Dr. Edwin Bezzina, Memorial University of Newfoundland Grenfell College, Impact of Hydraulic Fracturing on Tourism, available at: <http://hydrocarburesgim.ca/wp-content/uploads/ImpactTourismFeb13.pdf>.

²⁵ Report of the Special Rapporteur on the human rights obligations related to environmentally sound management and disposal of hazardous substances and waste, Calin Georgescu, U.N. Doc. A/HRC/21/48 (July 2, 2012), para. 39.

²⁶ Approach set out in the Report of the Independent Expert on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment, John H. Knox, U.N. Doc. A/HRC/22/43 (December 24, 2012).

²⁷ United Nations Conference on Environment and Development (Earth Summit), Rio Declaration on Environment and Development (1992), Principle 10.

²⁸ Report of the Commissioner of the Environment and Sustainable Development—Fall 2012 February 2013, Scott Vaughan, Commissioner of the Environment and Sustainable Development http://www.oag-bvg.gc.ca/internet/English/oss_20130226_e_37882.html



protection keeps pace with economic development. I am concerned by the gaps we found in the way federal programs related to natural resources are managed.”²⁹

“Requirements for chemical disclosure of hydraulic fracturing fluids are widely viewed as beneficial.”³⁰ One of the primary reasons that citizens and advocacy organizations have pushed for disclosure is to know what chemicals to test for in drinking water prior to the fracturing of oil and gas wells. Such baseline information is valuable to water well owners, as well as regulatory agencies carrying out investigations of alleged contamination events, as it provides an empirical means to determine if fracturing fluid chemicals have contaminated water supplies.³¹ In addition to the quality and access to information, Canadian authorities must guarantee a transparent, participatory, independent, and holistic assessment of the environmental, social, health, economic, and policy issues and risks. Once the drilling permit is submitted the province will have only a thirty-five-day period to respond with comments and then ten days for the minister to sign on to the project. This fast-track time frame would not allow for an adequate discussion and consideration of the rights and risks in question.

While these practices are being hotly debated in light of the manifold local concerns, economic considerations, potential impact on climate change, seismic effects, and others factors, we request the intervention of your mandates to provide guidance to the Canadian government as to the application of its international human rights obligations. Often in fracking debates there are assertions that are incompatible with a human rights-based approach, for example: “Natural gas is a revolutionary and disruptive technology that will naturally produce a small minority of losers, as well as the 99% who will be winners.”³²

This logic, however, helps to explain the observation from Special Rapporteur Albuquerque following her mission to the United States: “Large urban cities are better equipped to withstand pressure from the natural gas industry.”³³ “Natural-gas extraction in rural areas increases the likelihood that water contamination will go undetected, as rural water supplies are difficult to monitor.”³⁴

The dynamic in Newfoundland and Labrador was summarized as follows: “The area where Shoal Point would be drilling is sparsely populated and without much farmland. So as Langdon (SPEL Past President) sees it, fracking is likely to stir less opposition than in areas like Pennsylvania, New York State or the Quebec lowlands.”³⁵

²⁹ Id.

³⁰ Tiemann, M., Vann, A. January 10, 2013. Hydraulic Fracturing and Safe Drinking Water Act Regulatory Issues. Congressional Research Service Report for Congress. R41760. p. 25. <http://www.fas.org/sgp/crs/misc/R41760.pdf>

³¹ Lisa Sumi, MSc, for Council of Canadians, The Regulation of Shale Gas Development: State of Play (June 28, 2013) <http://www.canadians.org/sites/default/files/publications/OEB%20Sumi.pdf>

³² UNIDO, Fracking – yes or no?, Nick Grealy

http://www.unido.org/fileadmin/user_media_upgrade/Resources/Publications/Making_It/MakingIt12_web.pdf.

³³ Report of the Special Rapporteur on the human right to safe drinking water and sanitation, Catarina de Albuquerque, Mission to the United States of America, U.N. Doc. A/HRC/18/33/Add.4 (Aug. 2, 2011)

³⁴ Id.

³⁵ Lauren Krugel, Canadian Press, Is Newfoundland home to Canada’s next big oil find?, Financial Post, Sept. 11, 2012, http://business.financialpost.com/2012/09/11/is-newfoundland-home-to-canadas-next-big-oil-find/?_lsa=c101-f62e.



This attitude and approach reveals the need for the added value that the UN Special Procedures can bring to the conversation, by raising awareness of the application of international human-rights obligations to decision-making about and regulation of hydraulic fracturing. **Given your specialized mandates and expertise we respectfully request that you urge the Canadian government to maintain its international human rights obligations at the center of the design and implementation of its environmental and development policies.**

Recommendations

We urge you to advise the government to ensure, prior to any decision making about hydraulic fracturing in Newfoundland and Labrador, that:

1. a moratorium on all activities related to inshore to offshore hydraulic fracturing be declared until such time as all above requirements have been met;
2. proper regulations governing all aspects of this new method of onshore to offshore hydraulic fracturing be put in place to ensure that the protection of the environment and all life forms is given equal importance with resource development;
3. an objective independent environmental assessment and a compilation of the possible effects of this project on the social, health and economic welfare of the province be completed and made public;
4. a space is created for dialogue among the public, government, and industry about the results of the independent environmental assessment;
5. Black Spruce Exploration Corp. and Shoal Point Energy Limited be required to disclose the exact chemicals to be used in hydraulic fracturing related to this project and that specific information be supplied regarding all possible risks from the use of these chemicals to all life, human and non-human, including water, air and soil;
6. if hydraulic fracturing were to be approved, all spent fluids emanating from the operation be disposed of in a certified safe and satisfactory manner.

Additionally, we ask you to use your respective mandates to raise awareness of the application of human rights obligations to policies governing the practices of fracking:

1. study the specific threats that hazardous wastes from hydraulic fracturing pose to the enjoyment of all human rights, including the right to water, with a view to eliminating such threats and ensuring effective redress for victims;³⁶
2. promote implementation of relevant legal framework and best practices;
3. urge governments' compliance with their obligations to ensure effective public participation in decision-making about hydraulic fracturing;

³⁶ Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes, Mr. Marc Pallemerts, UN Doc. A/HRC/24/39 (Aug. 13, 2013)



4. and finally, call for the application of the precautionary principle with regard to these new extractive practices.

Thank you for your consideration of this important matter. We would very much appreciate the opportunity to provide any further information, documentation, or collaboration that would be helpful for each of you and your respective team members to follow up on this concern.

Sincerely,

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