



D/4260/2021
BY EMAIL ONLY

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BG International Limited
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22 September 2025

**Offshore Petroleum Regulator for
Environment & Decommissioning**

Department for Energy Security & Net Zero

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Dear [REDACTED]

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020**

NOTICE UNDER REGULATION 12(1)

Jackdaw Project

Whilst the effect of the reduction of the agreement to the grant of consent for the above project is suspended, as ordered by the Court of Session, the Offshore Petroleum Regulator for Environment and Decommissioning ("OPRED") acting on behalf of the Secretary of State for Energy Security and Net Zero ("the Secretary of State") has received further information from BG International Limited relating to the above project.

OPRED acting on behalf of the Secretary of State has identified, during initial consideration of the information received, that further information is required from BG International Limited. We request by 3 October the following information or confirmation of when BG International Limited proposes to provide information in response.

The further information provided on 2 September, assessed downstream scope 3 emissions as a proportion of global GHG emissions and carbon budgets. Assessment of the significance of likely effects from Scope 3 emissions to be produced by the project should also be evaluated in the context of a global baseline scenario of greenhouse gases and the current state of the climate and must also include an assessment of cumulative effects. Please refer to the "Supplementary guidance for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects" ("the Supplementary Guidance") and to paragraphs (3), (4) and (5) of Schedule 6 to the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020 ("the Regulations"). In particular:

1. In relation to a global baseline scenario the Supplementary Guidance notes (emphasis added) “[The] **baseline scenario has to be based on available up to date environmental information and scientific knowledge on global GHGs and climate,** which is well documented (IPCC, 2023; Lan, 2025; Lindsey, 2025; Jacobson, 2023; Met Office, 2025). Therefore, the scope 3 emissions estimated to be produced by the project, as outlined in “Estimating scope 3 emissions” section below, **should be evaluated in the context of a global baseline scenario of GHGs**”. The global baseline scenario presented should consider all relevant environmental information and scientific knowledge in relation to climate and the effects of climate when evaluating the project over the lifetime of the project.
2. In relation to current state of the climate the Supplementary Guidance notes (emphasis added) “OPRED’s current view **is that characterising scope 3 emissions from a project solely in numeric terms against global GHG emissions** would not on its own provide a meaningful expression of the global effect of those scope 3 emissions, because of the obvious difference in scale between individual projects and global emissions levels. Therefore, OPRED considers that an assessment of scope 3 emissions **in relation to the current state of climate** and global emissions-reduction pathways (IPCC, 2023) is more likely to support a reasoned conclusion on significance”. Assessment of the project should be in relation to the current state of the climate established as above and how the project aligns with global emissions-reduction pathways.
3. In relation to cumulative effects the Supplementary Guidance notes (emphasis added) that “Given the global effect of GHG emissions, the ES must consider **the cumulative effects** of the proposed project with other existing and planned future projects, in a global context.” Furthermore, in relation to an assessment of the likely significant effect of the project on the environment the supplementary guidance notes (emphasis added) “The ES, when evaluating the significance of likely effects of the project on the environment **must also consider and contain information on cumulative effects** [with reference to Schedule 6(4) of the Offshore EIA Regulations]”. The assessment of the likely significant effects of the project on the environment must include an assessment of cumulative effects.

In addition:

- a. Ensure appropriate conversions factors have been used and further clarification should be provided in support of the selected conversion factors.
- b. In relation to substitution the Supplementary Guidance notes that (emphasis added) “If a developer wishes to use substitution to help contextualise the scope 3 emissions, the **developer should provide evidence to demonstrate** that (i) hydrocarbons from the project will result in substitution of international hydrocarbon supplies into the UK; and (ii) there is no other demand for the international hydrocarbon supplies substituted by the project”. Claims that hydrocarbons from specific projects replace hydrocarbons that would otherwise be replaced by hydrocarbons from other sources need to be evidenced.

As the Supplementary Guidance makes clear, when reaching a decision as to whether agreement should be given to the grant of consent the Secretary of State will consider the environmental effects of the project (as required by the Offshore EIA Regulations) and will form a view of the overall balance of advantage between any potential significant effects on the environment, including wider benefits to the interests of the nation and any other relevant factors in proceeding with the project. Regarding information provided about jobs supported, this should be specifically linked to the project being considered. The breakdown of direct, indirect and induced jobs, the profile of the jobs over the life of the project and the type of jobs should be clearly set out. It would also be helpful to understand how estimates were derived and levels of uncertainty of those estimates. The same level of detail and project specificity should be provided for any other wider benefits of the project.

Your response to this request will be reviewed and consideration given as to whether any further information provided ought to be made public. In the event that we decide information should be made public, OPRED will notify BG International Limited under regulation 12(3), and BG International Limited will have to take further steps to publish information and make provision for public consultation under regulations 12(5) to 12(9) of the Regulations.

Yours sincerely

A large black rectangular redaction box covering the signature of the Senior Environmental Manager.

Senior Environmental Manager

The Offshore Petroleum Regulator for Environment and Decommissioning
For and on behalf of the Secretary of State for Energy Security and Net Zero