

ES/2022/001

Department for Energy Security &
Net Zero

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Dear ██████████

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

NOTICE UNDER REGULATION 12(1)

Rosebank Field

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”) received information on 25 September 2025 in response to its request for further information. OPRED is considering this together with the Environmental Statement (“ES”) and the representations received from the public consultation process in relation to the above project which have been published on:

<https://www.gov.uk/government/publications/rosebank-field-development>

Adura Operations Limited is hereby required to provide further information in relation to the following:

Part 1: The document “*Response to Requirement #1 (An assessment of the effects of downstream scope 3 emissions from the above project on climate) of the Regulation 12(1) Notice dated 21 July 2025*”

Section 3 – Environmental Baseline

1. Page 9 of the supplementary guidance for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects (“supplementary EIA guidance”) notes that: “*a realistic and reasonable description of the current state of the environment (baseline scenario) should be presented*” and that “*the effects of a project would be assessed against*” this baseline scenario. For scope 3 greenhouse gas (GHG) emissions the location of the emissions is not relevant and a global baseline in a global context must be considered.

Section 3.2 of the further information provided sets out global GHG emissions and historic trends but does not further describe the baseline scenario in relation to the current state of the environment. Please describe the current state of the climate and the environment, noting the baseline scenario will not be static over the lifetime of the project.

In line with the supplementary EIA guidance and Schedule 6(3), the baseline scenario should include a reasonable future estimate of global GHG emissions affecting the climate over the lifetime of the project, reflecting the expected trajectory of climate conditions and the environment.

Where illustrative emissions pathways are used to help describe a baseline scenario, then the likely trajectory of emissions and associated climate effects across the life of the field, should be considered (for example, but not limited to illustrative emissions pathways under IPCC AR6 such as CurPol/ModAct pathways¹).

The baseline scenario should consider all relevant environmental information and scientific knowledge (e.g. IPCC, 2023²) related to climate and the effects of climate over the lifetime of the project. This could acknowledge the effects of emissions and climate change currently and over the lifetime of the project on, for example, but not limited to:

- global and local marine environment (e.g. sea temperatures, marine heatwaves, ocean chemistry, impacts on carbon sequestration capacity);
- biodiversity, human health, climate-related tipping points; socio-economic implications
- extreme weather events.

2. Assessment of the No Project Scenario; Page 9 of the supplementary EIA guidance states:

“OPRED expects that these downstream emissions from a new project will be presented in the ES against a no project (‘do nothing’) scenario (i.e. total quantity of scope 3 category 11 emissions from the project against zero scope 3 category 11 emissions for a no project scenario).”

Paragraph 3.3.3 (page 22) of the further information describes a range of potential future climate scenarios and refers to these as representative conditions without implementation of the Rosebank Development; however, it does not present any conclusions on the state of the environment or climate under a no-project (“do nothing”) scenario.

Please provide a clear overview and conclusion of the environmental and climate conditions under the no-project scenario over the project lifetime, to enable the assessment of the project’s likely significant effects.

3. Paragraph 3.2.1 of the further information states that the *“Global climate systems have responded to the increase in CO₂ emissions through an increased uptake of CO₂ within the oceanic and terrestrial environments e.g. carbon sinks”*. This statement appears to be

¹ IPCC (2022). Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. Edited by P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz and J. Malley. Cambridge University Press, Cambridge, UK and New York, NY, USA. <https://www.ipcc.ch/report/ar6/wg3/>

² IPCC. (2023). Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. Geneva, Switzerland: IPCC

inconsistent with the conclusions of IPCC AR6 Working Group I³. The AR6 Working Group I report (page 19, Box B4) states that, "*Under scenarios with increasing CO₂ emissions, the ocean and land carbon sinks are projected to be less effective at slowing the accumulation of CO₂ in the atmosphere.*" Please provide evidence to support the statement made in the further information or revise the assessment to reflect the conclusions of IPCC AR6 Working Group I as appropriate.

4. Paragraph 3.2.12 refers to the remaining global carbon budget but does not explain its relevance in the context of greenhouse gas emissions trajectories or the objectives of the Paris Agreement. Please provide this context, including how the remaining carbon budget relates to future emissions pathways and Paris-aligned temperature goals.
5. Paragraphs 3.3.8 to 3.3.10 note that the emission reduction pathways presented are "*narrative tools that offer a nuanced understanding of potential futures without implying certainty and do not provide probabilities or assign likelihoods to future outcomes*". However, the IPCC AR6⁴ report states (A.4 page 10) that it is likely that warming will exceed 1.5°C and make it harder to limit warming below 2°C. Please update the assessment to reflect the conclusion of IPCC AR6, with these findings considered alongside the emissions reduction pathways.

Comments relating to Section 4: Environmental Protection Objectives/Climate Policy:

6. Table 5 is stated to summarise environmental protection objectives relevant to the consideration of the project's downstream emissions (4.3.1). It is unclear on what basis all of the objectives and policies listed are relevant or whether they have been considered, and some references are either not up to date or are not entirely accurately represented. Please clarify which objectives have been considered, including which in relation to the project's Scope 3 emissions (as well as which of the project Scope 3 emissions), and which objectives have been considered in relation to Scope 1 emissions instead.

Comments relating to Section 5: Estimating Scope 3 Emissions:

There appear to be some typographical or cross-referencing errors; for these, please confirm the references are as we assume, as follows:

7. Paragraph 5.3.1 refers twice to Table 6, please confirm that each reference to this should read "Table 5".
8. Paragraph 5.3.2 refers to Table 7, please confirm that this should be "Table 6".

³ IPCC, 2021: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 2391 pp.
doi:10.1017/9781009157896

⁴ IPCC, 2023: Summary for Policymakers. In: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland, pp. 1-34, doi: 10.59327/IPCC/AR6-9789291691647.001

9. Paragraph 5.4.1 Please provide a table outlining the production data that was used to calculate the scope 3 emissions.
10. Paragraph 5.4.2 refers to Table 8, but we note there is not a Table 8 in the further information. Please confirm that this should be Table 7.
11. Table 7 refers to footnote 55 for Natural Gas, but should the reference be to footnote 53, please clarify?
12. Footnote 52 refers to Table 5; however, Table 5 summarises scope 1 emissions and does not include P10 production data. Please clarify whether footnote 52 is intended to refer to the quantity of GHG emissions associated with fuel gas and flare gas, rather than volume of fuel gas and flare gas.
13. Paragraph 5.5.1 presents GHG emissions data for categories 9, 10 and 11. Please confirm if the scope 1 emissions have been subtracted from the categories 9, 10 and 11 emissions because those scope 1 emissions have been accounted for elsewhere.
14. Paragraph 5.6.3 and Table 12 present downstream scope 3 emissions estimates for P50 and P90 values; however, we have been unable to reproduce the data using the stated approach (i.e. applying 30% and 50% reductions to the P10 data). Please explain and demonstrate how the P50 and P90 emissions estimates have been calculated.

Comments Relating to Section 6: Evaluating Significance of the Likely Effects

15. The EIA Regulations require an assessment of the likely significant effects of the project on the environment, including those resulting from the cumulation of effects with other existing or approved projects, and including covering the matters listed in Schedule 6(4)(f) and 6(5).

Whilst in Paragraph 6.2.1 you acknowledge the link between emissions and warming of the climate, and that the impact of emissions on climate is a likely impact, Section 6 of the Further Information does not explicitly assess the likely significant effects of the project's GHG emissions, in relation to climate change and the matters listed in Schedule 6(5), either alone or in cumulation with other existing or approved projects.

The effects of climate change are well documented (e.g. IPCC (2023)⁵, WMO, 2026⁶). Please ensure that the assessment of likely significant effects, including cumulative effects, covers the requirements of the EIA Regulations as relevant.

This assessment should be undertaken against the baseline scenario for the environment and climate and its likely evolution over the lifetime of the project.

16. Pages 11 and 12 of the supplementary EIA guidance state that: *"An ES must include an assessment of the significance of the likely effects of scope 3 emissions. The ES, when evaluating the significance of likely effects of the project on the environment must also*

⁵ IPCC. (2023). Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. Geneva, Switzerland: IPCC.

⁶ WMO. (2026). State of the Global Climate 2025. Retrieved from World Meteorological Organization: <https://wmo.int/publication-series/state-of-global-climate/state-of-global-climate-2025>

consider and contain information on cumulative effects.” And “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. If global reduction pathways are used to contextualise magnitude of emissions as above, this approach should be inherently cumulative, as these pathways take into account a wide range of existing and planned projects and other activities. Alternatively, or in addition, developers may choose to use information from global oil and gas datasets and inventories.”

The further information relies primarily on modelled demand and emissions reduction pathway narratives without explaining how cumulative effects with other existing or approved projects have been addressed nor the basis for the conclusion that the Rosebank Development’s downstream scope 3 emissions are “not significant” under a Paris-aligned pathway.

Alongside the more specific points below (paragraphs 17 to 34) please therefore:

- i) update the assessment of the likely significant effects of the project’s downstream scope 3 emissions as appropriate, including cumulative effects with other existing and approved projects, in a global context.
- ii) Where emission-reduction pathways are used, clearly explain the assumptions, limitations, and uncertainties in the modelled data and how these have been taken into account when reaching conclusions on significance.
- iii) Explain how the assessment accounts for emissions associated with current and approved fossil fuel projects (i.e., how much demand/ emission reduction pathway “space” is already met by existing/approved supply), and how this affects your conclusions.

17. Paragraph 6.1.1 (and footnotes 58–59) describes the approach to “cumulative effects”. Please clarify whether assessment of cumulative effects has been limited to re-use of infrastructure for local projects, and—if so—update the assessment to address cumulative scope 3 effects alongside other existing or approved fossil fuel projects globally (including use of global datasets/inventories where appropriate).

18. Paragraph 6.3.2 states that IEMA guidance⁷ has informed the evaluation of the significance of the project’s scope 3 emissions, using a matrix approach. The IEMA guidance (page 24) explains:

"The crux of significance therefore is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050".

Whereas paragraph 6.3.4 of the further information instead frames significance in terms of alignment with global emission-reduction pathways, without explaining how the project contributes to reducing emissions relative to a net-zero-consistent baseline. Paragraph 6.3.4 of the further information states:

⁷ https://www.iema.net/media/xmgpooopk/2022_iema_greenhouse_gas_guidance_eia.pdf

“The key consideration in evaluating significance is not simply whether a project results in GHG emissions, nor the absolute volume of those emissions, but whether that project aligns with global emission reduction pathways.”

Please clarify and update the assessment as appropriate to either align with the IEMA approach to evaluating significance or clearly explain where and why the evaluation does not align with that guidance.

- 19.** Section 6.3 states that IPCC AR6 illustrative mitigation pathways (IMPs) are used to account for existing and planned projects. However, the IMPs referenced illustrate alternative strategies for reducing GHGs to meet specific climate goals such as limiting warming to 1.5°C. The IMPs provide useful examples of how different combinations of technologies, policies and behaviour changes could meet a climate target.

Please update your assessment where any emission reduction pathways or IMPs from various sources are used, to acknowledge the assumptions and limitations for the purpose of contextualising and assessing the significance of the scope 3 emissions from the project. This assessment of the cumulative effects of the scope 3 emissions may also benefit from global oil and gas datasets and inventories. There are multiple sources of projected emissions from current plans and projects you may wish to consider, such as IISD (2022)⁸, Muttitt et al (2025)⁹, IEA (2023)¹⁰, UNEP (2023) - Figure 2.2¹¹, Trout et al (2022)¹².

- 20.** Paragraph 6.3.11 – states the IMPs referenced do not have a likelihood attached to them, yet the assessment of significance relies on these pathways to reach a conclusion on likely significant effects of the project and how they relate to the Paris Agreement. Please provide evidence of why net zero policies and Paris aligned commitments (per Paragraph 6.3.17) are then selected as more likely than the other IMP scenarios presented to support the assessment of significance.
- 21.** Paragraph 6.3.20 - please clarify in the matrix presented in Table 14, which project emissions have been considered under the different commitments, policies and strategies. As currently the paragraph presents in the context of downstream scope 3 emissions as a whole, whereas not all commitments, policies and strategies apply in this context. For example, those commitments related to territorial emissions will not apply in the global context.
- 22.** Section 6.4 - The assessment of the likely significant effects of the project is based on models of oil and gas demand in different emission reduction pathways. Please

⁸ International Institute for Sustainable Development (IISD) (2022) Navigating Energy Transitions [Navigating Energy Transitions](#)

⁹ Greg Muttitt, Fergus Green and Steve Pye, The Climate Implications of New Oil and Gas Fields in the UK—An Overview of the Evidence, June 2025, UCL Policy Lab, UCL Energy Institute, and UCL Department of Political Science [report-climate_implications_pages_online.pdf](#)

¹⁰ International Energy Agency (2023) The Oil and Gas Industry in Net Zero Transitions ([The Oil and Gas Industry in Net Zero Transitions – Analysis - IEA](#))

¹¹ SEI, Climate Analytics, E3G, IISD, UNEP. (2023). Phasing Down or Phasing Up? Top Fossil Fuel Producers Plan Even More Extraction Despite Climate Promises: Production Gap Report 2023. <https://doi.org/10.51414/sei2023.050> ([PGR2023_web_rev.pdf](#))

¹² Kelly Trout et al 2022 *Environ. Res. Lett.* **17** 064010 DOI 10.1088/1748-9326/ac6228 (<https://doi.org/10.1088/1748-9326/ac6228>)

update the assessment as appropriate to assess against the current state of the environment (baseline scenario) noting (as per paragraph 1 above) it will not remain static over the lifetime of a project and include the emissions (and where appropriate, production quantities) associated with other plans or projects. The assessment should consider the likely significant effects of emissions from the project, including the cumulation of effects with other existing or approved projects.

- 23.** Paragraph 6.4.3 discusses global demand for oil and gas and refers to IPCC Working Group II findings that indicate ongoing demand across future scenarios. However, the IPCC AR6¹³ report (B.5.3 p20) also concludes that cumulative CO₂ emissions from existing fossil fuel infrastructure—without additional abatement—already exceed the remaining global carbon budget for limiting warming to 1.5°C (high confidence), and would deplete more than a third of the remaining budget for 2°C. Please update the assessment to reflect this, by explaining how the existence of ongoing demand is reconciled with IPCC findings on the global carbon budgets, and by clarifying how emissions from other existing and approved projects have been taken into account when assessing the cumulative effects of the project alongside other existing or approved projects.
- 24.** Paragraph 6.4.6 presents emissions data for 2030, 2040 and 2050 (14, 10 and 4 MtCO_{2eq} respectively). These figures do not appear to add up to the stated whole project emissions of 245MtCO_{2eq}. Please review and explain the data presented in Paragraph 6.4.6.
- 25.** Paragraph 6.4.6 and Table 15 compares project emissions against global emissions under IPCC emissions-reduction pathways. However, the supplementary EIA guidance (page 12) explains that comparing an individual project's scope 3 emissions numerically against global emissions, due to scale differences, does not on its own provide a meaningful indication of global effects. A more meaningful assessment would be to consider the project's GHG emissions in cumulation with other existing and approved projects at a global scale.

Please therefore update the assessment as appropriate to explain how cumulative global effects have been considered. In doing so, it may be useful to expand on the global carbon budget discussion in Paragraph 3.2.12 by placing the Rosebank project's GHG emissions in the context of remaining IPCC AR6 global carbon budgets, alongside emissions from other existing and planned projects over the life of the field. This would help clarify how cumulative emissions relate to a 1.5°C Paris-aligned trajectory and inform conclusions on the significance of effects.

- 26.** Paragraph 6.4.7 refers to the production gap 2023 UNEP report¹⁴. The UNEP Production Gap Report 2025¹⁵ shows that global fossil fuel production from existing and planned resources is now 120% higher than levels consistent with limiting warming to 1.5°C, compared with 110% reported in 2023. The 2025 report also

¹³ IPCC, 2023: Summary for Policymakers. In: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland, pp. 1-34, doi: 10.59327/IPCC/AR6-9789291691647.001

¹⁴ SEI, Climate Analytics, E3G, IISD, UNEP. (2023). Phasing Down or Phasing Up? Top Fossil Fuel Producers Plan Even More Extraction Despite Climate Promises: Production Gap Report 2023. <https://doi.org/10.51414/sei2023.050>

¹⁵ SEI, Climate Analytics, & IISD. (2025). The Production Gap Report 2025. Stockholm Environment Institute, Climate Analytics, and International Institute for Sustainable Development. [2025 Report - Production Gap](#)

provides a breakdown of the production gap for oil, gas and coal (Figure ES.2, page 4). Please update the assessment to reflect the findings of the 2025 UNEP Production Gap Report and ensure that the conclusions drawn are based on the most up-to-date evidence.

27. Paragraph 6.4.9 makes reference to information presented in Table 16. Please clarify the source of information in Table 16 and how this data is calculated. The UNEP production gap reports state that Governments plan to produce more fossil fuels in 2030 than would be consistent with the 1.5°C or 2 °C warming scenario. Based on this, please explain the conclusion in the paragraph that the Rosebank Development P10 production profile is within a Paris Agreement aligned pathway.
28. Paragraphs 6.4.13 to 6.4.19 – makes reference to the International Energy Agency (IEA) report ¹⁶ but does not address some of its conclusions. The IEA Net Zero scenario requires no new oil and gas projects to meet the future demand. The IEA report also discusses on p14 that there is no room for new fields and p16 discusses that it cannot be left to addressing demand solely to resolve emissions. Please ensure that the IEA report has been fully considered as part of the assessment.
29. Paragraph 6.4.16 compares IEA future oil and gas demand scenarios with expected production from the Rosebank project to assess likely effects. However, due to scale differences, this comparison alone does not provide a meaningful assessment (see page 12 of the supplementary EIA guidance as mentioned in paragraph 25 above). In addition, the assessment does not consider the climate effects associated with the different scenarios.

Please update the assessment to explain how the climate effects of the IEA scenarios have been considered, including emissions from other existing and approved projects, and how these scenarios inform conclusions on likely effects on the environment (for example, by reference to projected temperature outcomes such as those presented in Figure 1.5 of the IEA *World Energy Outlook*¹⁷).

30. Table 17 and paragraph 6.4.17 also compare future oil and gas demand scenarios from the IEA with expected production from Rosebank. The table does not include GHG emissions. As indicated in paragraph 6.4.17, some scenarios in the future demand models do not always consider full combustion of the hydrocarbons. The supplementary EIA guidance on p9 indicates that the starting point should be that all produced hydrocarbons will eventually be combusted and where scenarios for non-combustion use are presented, evidence must be provided. The scope 3 assessment needs to assume that all oil and gas is combusted as the end use cannot be guaranteed and therefore, comparison to these scenarios where not all oil and gas is combusted would not fully assess the effects of scope 3 emissions on the environment.

Please re-visit the assessment to ensure that consideration is given to the assumptions and limitations of any model when used in support of characterising

¹⁶ International Energy Agency (IEA) (2021) updated in 2023 - The Oil and Gas Industry in Net Zero Transitions ([Net Zero Roadmap: A Global Pathway to Keep the 1.5 °C Goal in Reach – Analysis - IEA](#))

¹⁷ [International](#) Energy Agency (IEA) (2025) World Energy Outlook 2025 (p37)

and assessing the environmental effects of the scope 3 emissions. Where you choose to present non-combustion use, provide evidence.

31. Paragraph 6.4.19 (including 6.4.19.1 & 6.4.19.2) concludes that based on the significance matrix the consequence of the project is assessed as low and therefore not significant in terms of effect on climate. This conclusion is based on stating that the Rosebank project aligns with net zero oil and gas demand pathways published by the IEA, under the assumption that a decline in demand results in the decline of emissions. However, earlier in the further information you state that the emission reduction pathways do not have a likelihood attached to them, therefore, it is unclear why you have selected the net zero pathway to make the conclusion that the significance is low.

The conclusion on significance should be revisited based on the references you have cited in the further information and include an assessment relating to downstream emissions from the combustion of project hydrocarbons (assuming all produced hydrocarbons are combusted) and the emission reduction pathways including for other existing plans and projects (please see also paragraphs 20 and 34).

32. Paragraph 6.4.20 to 6.4.22 please confirm which of the listed EPOs, as described in the further information, have been considered in the assessment of the scope 3 emissions (as also covered in points 6 and 21).
33. Paragraphs 6.4.22 and 6.4.23 discuss the Climate Change Committee's advice¹⁸ on the demand for oil and gas under UK future carbon budgets concluding in paragraph 6.5.6.3 that the UKCS production is within the future demand under Carbon Budget 7 and therefore that the consequence is low. The further information does not represent accurately the reference to the CCC's document, as this document is providing advice on the level of Carbon Budget 7 to achieve Net Zero Greenhouse Gas emissions by 2050. The CCC's modelling for a CB7 "*Balanced Pathway*" is done at the sectoral level and does not constitute endorsement of specific projects. Please provide an update to accurately represent the information referenced in the context of emissions rather than focusing on demand.
34. Paragraphs 6.5.3 and 6.5.7 provide conclusions on the assessment of likely significant effects. It is stated in these paragraphs that where Paris alignment is not achieved that emissions from any project including Rosebank could have a significant effect on climate. It is subsequently concluded under a Paris aligned pathway, that the effect of Rosebank's scope 3 emissions is not significant. Please provide an update giving further consideration to the likelihood of the presented pathways in support of the assessment, we noted that there are multiple pathways with no likelihood attached, as such any of the outcomes are possible. Further, in light of point 30, consideration that all hydrocarbons are combusted must be included.

¹⁸ Climate Change Committee (2025) The Seventh Carbon Budget – Advice for the UK Government ([The Seventh Carbon Budget - Climate Change Committee](#))

35. In the Glossary Section the following needs to be addressed:

Global Carbon Budget; please clarify the reference of the definition, for example, is it as calculated and referenced in the IPCC reports or another source?

IMPs - please reference where this definition came from - for example is it from AR6 WGIII? (Mitigation pathways or scenarios are called different things in different reports e.g. RCP's are in AR5).

IPCC Scenarios (SSP-RCP) please be clearer about where this comes from as this relates to IMPs - which IPCC report does this come from?

Part 2: (A) The document “*Response to Requirement #2 (Revised and updated assessment of the likely significant effects of the project on the environment that is not limited to downstream scope 3 emissions) of the Regulation 12(1) Notice dated 21 July 2025*”

36. Paragraph 4.3.2 *Seabed Fauna* 4.3.2.2.3 *Cold water corals*. Please summarise the evidence used to support reaching the conclusion that there were no coral gardens present in the survey area. It could be beneficial to summarise the re-examined survey sites in a table, alongside all the coral species identified that contribute to the taxa listed in the Henry & Roberts (2014)¹⁹ UK technical definition for coral gardens against the assessment criteria for each location.

37. Paragraph 6.4.2 *Potential Seabed and Habitat Impacts, including on Protected Sites*. The assessment of sponge aggregations within the surveyed area presented needs to be explained. A clearer understanding of the potential presence of any habitats that can be classified as sponge aggregations is required in order to evidence the conclusion reached. Please provide:

- a summary of the depth in metres of all sampling stations used in the environmental survey.
- the outcome of the review of the Henry & Roberts 2014 criteria for sponge density classification. This could be provided in a table format to improve clarity.

38. Please provide the potential total cumulative effects on the seabed (in square kilometres (km²) from the permanent infrastructure that has been installed since the designation of the National Conservation Marine Protected Area (NCMPA) Faroe-Shetland Sponge Belt (FSSB). This should include the effect from current Rosebank operations and the potential impact from proposed Rosebank operations, in addition to the impact from other approved projects e.g. existing infrastructure from other oil and gas operators (out with the NCMPA FSSB and within). In addition, please include the potential impact upon the NCMPA FSSB as a % of the total area of the NCMPA in addition to the area of impact in km².

¹⁹ Henry, L.A. & Roberts, J.M., (2014), Developing an interim technical definition for Coral Gardens specific for UK waters and its subsequent application to verify suspected records, JNCC Report No. 507, JNCC, Peterborough, ISSN 0963-8091. [Developing an interim technical definition for Coral Gardens specific for UK waters and its subsequent application to verify suspected records | JNCC Resource Hub](#)

Part 2: (B) Comments relating to the original ES and not covered within the updates

- 39.** Paragraph 3.4.5 *Mud Selection and Cuttings Discharge*. There appear to be discrepancies between the amount of drill cuttings proposed for discharge assessed in the ES and the latest Screening Direction applications submitted to OPRED. For example, drill cuttings discussed in the ES for phase 1 wells such as DP1 indicate a total of 948 tonnes with no contingency, whereas the latest screening direction applications indicate, for well DP1, a potential quantity of 1339 tonnes (with no contingency) and 1890 tonnes including a contingency. Please clarify.
- 40.** Please also clarify whether the original conclusion presented in the ES of the potential environmental impacts associated with the proposed discharge of drill cuttings remains or needs to be amended. If the latter, please provide an update.
- 41.** Paragraph 9.1 *Atmospherics and Climate – Introduction*. Table 9.1 *List of the planned activities at the Development contributing to atmospheric emissions*. Detail the methane emissions associated with tanker loading, as described in Table 9.1 of the ES and how the methane emissions could be minimised
- 42.** Paragraph 9.3.6 *Quantification of Emissions during Production Operations*. The ES presents the estimated scope 1 emissions from production operations in Table 9.5 based on the normal operation of equipment. As no information has been presented about the calculations behind the figures presented in this table, it is assumed that the basis for these emissions calculations is the load from 2 turbines out of 4 operation. However, OPRED has been made aware that the normal installation demand and installation peak load demand is in the region of 28.9MWe and 31.7Mwe, respectively with turbines operating in a 3 out of 4 configuration. Therefore, the estimated emissions calculated and presented in Table 9.5 in the ES may need to be updated. Please clarify and present accordingly:
- a. the normal installation load and peak load;
 - b. The operational configure of the turbines to satisfy the normal and peak loads (e.g. 3 out of 4 operation)
 - c. include a copy of the spreadsheet discussed in Footnote 42 of the ES to assist in understanding the inputs to the calculation of point a above and explain how this leads to the operational philosophy of the turbines.
 - d. An update to the scope 1 emissions presented in Table 9.5 of the ES where required or an explanation as to why no change is required.
- 43.** Paragraph 3.7.8.1 *Power Generation*. Figure 3.20 *Estimated energy requirement for the range of services on the FPSO at Rosebank, A for life of field and B comparative for a typical year*. To provide further clarification and calculations behind Fig. 3.20, please submit a review and explanation of the potential electrical load by setting out the contributing items >0.5MWe of equipment in a table.
- 44.** Paragraph 9.3.8 *Carbon Intensity of Production*. The ES states that, “*The intensity for the Development in the base case, defined as efficient gas turbines and optimised operations, is estimated to be approximately 12 kg CO₂/boe.*” In clarifying the above points, please re-visit and state whether the estimated carbon intensity of production of 12kgCO₂e/boe stated needs to be revised and provide any updates accordingly.

45. Assessment of the likely significant effects of the project on the environment resulting from vulnerability of the project to climate change

The original ES submission under paragraph 4.2.4 and 4.6 assesses the metocean conditions in the project area. Please clarify if this information is up to date and whether the metocean conditions discussed in these sections of the ES includes the likely evolution of metocean conditions (wind and wave heights) that pose a risk to the development and may result in an accidental event in an increased risk of hydrocarbon spills over the lifetime of the project.

Part 3: The document “*Response to Requirement #3 (Provision of relevant information for the Secretary of State to consider when reaching a decision on whether or not to agree to the grant of consent) of the Regulation 12(1) Notice dated 21 July 2025*”

46. Section 3 ‘Good, Long-Term Jobs’ (pages 6 & 7) provides information on job creation/retention (including on the supply chain and man-years of full-time work). Please provide:

- a. Detail of the methodology used to reach the figures in paragraphs 3.2 and 3.3.
- b. An annual profile of jobs generated during construction and operation, broken down by direct, indirect and induced, detailing the methodology.
- c. Any uncertainty analysis of jobs generated (i.e. high/low sensitivities)
- d. The underlying figures, or updated figures where relevant, to Figure 1 in this [report](#)²⁰ published on Equinor’s website estimating the number of UK based full-time Rosebank employees from 2022 to 2054.
- e. If available, a breakdown of the types of job roles created by the Rosebank project, with estimated salaries & any other relevant metric of quality. For example, engineers, technicians, welders.
- f. The number of apprentices trained, if any, as a direct result of the project.
- g. Information on any specific provisions to train and upskill workers (both for work on the project itself and for the transition to green technologies in the North Sea).

47. Section 4 ‘Growth and Investment in Communities’ (page 8) provides information on the Gross Value Added (GVA) of the project and figures on the investment created (including an estimate of investment in the UK economy). Please provide:

- a. Detail of the methodology used to reach the figures in paragraph 4.1 and 4.2 (including the GVA figures in paragraph 4.2).
- b. An annual profile of GVA generated over the Rosebank project’s lifetime, broken down by direct, indirect and induced.
- c. Any uncertainty analysis of GVA generated (i.e. high/low sensitivities)

²⁰ [0c0ac22fa94009344190f5cdad065ba88b4404ed.pdf](#)

- d. Annual profile of investment and cost figures over the Rosebank project's lifetime, e.g. operating expenses (OpEx), capital expenditure (CapEx) and decommissioning, with breakdown of investment/costs and any relevant investment in local communities (e.g. port infrastructure etc).
- e. We note the direct investment figure on page 8 is stated as £8.5bn, whereas in this [report](#)²¹ published on Equinor's website (page 7) it is £8.1bn. Please confirm which is the correct figure and/or explain the differences between these.

48. Paragraph 2.4 states: *“Rosebank also supports future energy flexibility through its Floating Production, Storage and Offloading vessel (FPSO) design and aligns with the UK Government's strategy to maintain domestic production to preserve critical infrastructure, skills, and supply chain capacity for the energy transition.”* Please provide detail on how the FPSO design supports future energy flexibility.

49. We anticipate that information within the Supply Chain Action Plan (SCAP) and the Standard Economic Template (SET) may be relevant to considering the information provided in relation to job creation/retention, the supply chain and contribution to economic growth – **please provide these if so.**

Please also provide, if not included in the SCAP or SET, any other information relevant to considering these effects or which might put those effects in context, such as:

- a. the geographic location of supply chain jobs linked to the project;
- b. the percentage UK content of the supply chain linked to the project;
- c. an overview of tier 1 suppliers linked to the project (such as the names of companies, an indication of what they were supplying, approximate contract value and geographic location of those suppliers).

50. Should the project impact on other infrastructure, Adura may wish to provide information on those aspects – for example should the project extend the life of, or better utilise, any existing infrastructure; or support the managed decommissioning of legacy infrastructure. This could include, if applicable, the extent to which the project could become part of a ‘low carbon’ hub by sharing infrastructure with offshore wind, hydrogen or CCS projects, or could de-risk future opportunities such as a carbon storage, hydrogen or offshore wind project or ‘low carbon’ hub.

51. Please provide the Wood Mackenzie reports referenced on pages 5, 6, 8 & 10:

- a. Wood Mackenzie, ‘Rosebank – Social Economic Impact Analysis’ (15 July 2024)
- b. Wood Mackenzie, ‘Rosebank Development Social Economic Impact Study – Refresh’ (December 2023)

²¹ [0c0ac22fa94009344190f5cdad065ba88b4404ed.pdf](#)

Your response will be reviewed, and consideration given as to whether any information provided ought to be made public. If so, OPRED will notify Adura Operations Limited under Regulation 12(3), and Adura Operations Limited will have to take further steps to publish information and make provision for further public consultation under Regulations 12(5) to 12(9).

OPRED looks forward to receiving your response so that we can progress our consideration of the matter.

Yours sincerely



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