

Summary of campaign representations

Two representations were submitted as part of campaigns (Stop Rosebank and Parents for Future UK) that collated the individual views of around 13,000 members of the public. A summary of the main points from these campaign representations received is included below. This summary seeks to use wording from the representations, though clearly cannot reflect all views received. The summary should not be taken as indicating any view on the representations provided.

Stop Rosebank Campaign

The Stop Rosebank campaign submitted a representation made up of a collation of contributions from over 12,000 individuals. The contributions ranged in length and detail, with many giving a brief line expressing their opposition and many making arguments centring on some or all of the following six points (or parts of them) from the Stop Rosebank campaign website:

1. Rosebank is not compatible with a safe climate and will bust UK climate goals.

Scientists have warned time and time again that governments can't allow more new oil and gas if we want to limit global warming to 1.5C. Rosebank will bust UK climate goals and push us closer to more parts of our world becoming uninhabitable. Rosebank's oil and gas would produce more CO2 than the 28 poorest countries do in a year.

2. It won't lower our energy bills or make our energy supply more secure.

Oil and gas prices are set on a global market, so more domestic production simply doesn't lower our bills. 90% of the fuel that would be extracted from Rosebank is oil, which would most likely be exported overseas. This isn't about energy security. Even the last government admitted it.

3. The UK public would carry almost all the costs of developing Rosebank in the form of billions in tax breaks for oil giants.

Thanks to a generous tax system, Norwegian state-owned oil giant Equinor and oil company Ithaca will pass the majority of the cost of developing the Rosebank oil field to the UK public. This means the UK public would hand over BILLIONS in tax breaks to Rosebank's owners, just to develop the field. UK's biggest gas supplier, Equinor, makes record-breaking profits while millions are struggling to pay their energy bills.

4. Some of Rosebank's vast oil profits could flow to a company that operates in illegal settlements in Palestine.

The oil company behind Rosebank and Cambo, Ithaca, is majority-owned by the Delek Group. Delek has been listed by the UN amongst businesses that are facilitating and profiting from the construction and growth of Israeli settlements in Occupied Palestinian

Territory. The risk that profits from exploiting the North Sea may flow towards a company linked to settler colonialism in Palestine is indefensible.

5. New fields like Rosebank won't solve the decline of jobs in the North Sea. Only a just transition will.

The North Sea basin is in decline with jobs having halved in the last decade. New fields like Rosebank won't stem this decline - it will only delay the transition to clean energy. Instead, accelerating the development of renewable energy - and ensuring that manufacturing and other benefits are based in the UK - will deliver the jobs needed.

6. Rosebank is right next to a marine protected area and threatens endangered species.

The marine protected area is home to many endangered and threatened species of dolphins, whales and fish. Loud drilling, seismic blasting and construction could disrupt their behaviour and even cause deaths. A major oil spill would have catastrophic impacts reaching neighbouring countries. Its pipeline would cut through a specially protected seabed which could harm clams that are some of the oldest animals on the planet.

Responses also raised points including the following, as well as and/or instead of the above campaign arguments:

1. UK climate leadership

Contributions raised that approving Rosebank could undermine the UK's climate credibility and leadership on the world stage. Contributions also raised that this could negatively impact the ability of the UK to influence other countries to decarbonise and could set a precedent for further fossil fuel extraction.

2. UK obligations under international law

Contributions raised that certain legal obligations apply and, in some cases, that approving the project would be contrary to legal obligations and international guidance. This includes that approving the development would be in breach of the UK's Paris Agreement obligations and risk the UK's compliance with obligations set out in the International Court of Justice's Advisory Opinion on Climate Change.

Contributions also raise that the European Court of Human Rights (ECtHR) has held that Article 8 of the European Convention on Human Rights (ECHR) requires

rigorous and comprehensive environmental impact assessment, including cumulative GHG emissions, before making decisions on petroleum extraction.

It was also raised that Scotland enshrined the UN Convention on the Human Rights of the Child into Scots Law and every child has the right to a liveable future. A contribution raised that Rosebank contradicts the UN Sustainable Development Goals.

3. Inadequate/incorrect assessment of scope 3 emissions

Contributions raise concern that the scope 3 emissions from the burning of hydrocarbons extracted from Rosebank should be considered significant; and that the scope 3 emissions assessment published by Equinor does not fully consider the effects of emissions on climate (see point 4).

4. Effects of the Rosebank downstream emissions on climate and the impacts of climate change

Contributions raised concerns over the effects of the Rosebank scope 3 emissions on climate including for example:

- that more frequent, intense and unpredictable episodes of heat, wildfires, flooding and drought are already affecting the world (including the UK);
- effects on the UK's infrastructure, food system, border security, NHS and national security (due to global instability) etc will be put under further strain and cannot survive significant climate disruption;
- climate change is displacing people (and will continue to do so), potentially causing a migration crisis;
- climate change is a threat to global human health, with harm caused directly (e.g. from extreme weather events, heat illness, spread of infectious diseases, and starvation) and indirectly;
- climate change negatively impacts socioeconomic factors affecting the wealth/prosperity of the country. It will create significant additional costs for businesses, households and public services by undermining and disrupting crucial sectors of the economy. Impacts on various sectors can be translated into loss of socioeconomic welfare and reported as an equivalent loss of the UK's GDP;
- climate change is responsible for environmental effects including but not limited to loss of biodiversity, acidification of seas, coral bleaching, protected species and habitats;

- global tipping points – catastrophic climate related tipping points such as melting of ice sheets and changing of the Atlantic Meridional Oscillating Current (AMOC);
- the current trajectory of warming is likely to exceed 2 degrees.

5. Effects of the use of Rosebank's products

Contributors raised that pollutants produced from the combustion of fossil fuels will continue to cause various health issues, with these health effects being more prevalent in lower socioeconomic groups.

6. Other environmental impacts

Alongside global warming and impacts on the immediate marine environment (see point 6 of the campaign response), contributors raised that some of the oil from Rosebank could contribute to plastic pollution. Contributors also expanded on point 6 of the campaign response highlighting impacts on birds, the wider environment and the risk of oil spills.

7. Impacts on the local community

Contributors raised that the development would damage North Sea ecosystems resulting in loss of livelihood for fishermen. Contributors also raised that the impact on birds and the environment could impact local tourism.

Another concern was raised that the Rosebank ocean area is not covered by UK Employment Laws which only extend 10 miles offshore, meaning that the companies developing the oil field are free to import workers from low pay countries resulting in no jobs for UK workers.

8. Fairness

Some contributions raised that the least developed countries will see the greatest impact of climate change (impacts summarise in point 3), whilst contributing to it the least, asserting that the UK has a responsibility to decarbonise in part due to historic emissions. Contributions also raise that approving Rosebank is unfair to future generations as they assert that it will be future generations are the ones that have to deal with the impacts of climate change and also will not have the benefit of fossil fuels in the future for petrochemicals and energy etc. as a finite resource. Some raised that continued reliance on fossil fuels supports autocratic regimes.

9. Alternatives to fossil fuels

Contributors called for the UK to invest in renewable forms of energy generation such as wind and solar, which some contributors claim are cheaper as well as

better for the environment. Some said that Carbon Capture and Storage would not be a realistic solution to climate change. There were claims that approving Rosebank could divert funds from green industries and delay the transition to clean power, impacting on the climate and long-term jobs/investment.

10. Does not economically benefit UK

Contributions raise that the profits from Rosebank will go to a small number of wealthy investors and foreign owned companies, which increases wealth inequality and climate injustice (see point 8). There were claims that Rosebank would not benefit the UK or local communities economically (see point 7), as well as not contributing to the government's growth agenda. Contributors also raised that the economic case for Rosebank was marginal, potentially resulting in stranded assets and public risk regarding decommissioning costs.

11. Undermine electoral trust/political impact on Labour party

Contributors argued that the public were not in favour of Rosebank; and that the Scottish people/parliament's view should be reflected in the ultimate decision.

Some raised concerns that the government is unduly influenced by wealthy and powerful fossil fuel companies/lobbyists, including allegations that the oil industry has historically lied about the impacts of climate change. Contributions also raised that people voted for Labour partly for their climate pledges and that approving Rosebank would undermine the public's trust in the elected government. Some also raised that approving Rosebank would have a negative political impact for Labour at future elections, with climate conscious voters aligning with other parties.

Although the vast majority of the contributions expressed opposition to the development, there were a very small number that were in support of the Rosebank project.

Parents for Future UK

Parents for Future UK submitted a representation made up of a collation of contributions from over 500 individuals. Parents for Future represents the views of parents and carers, the covering note stated that "80% of parents say they are concerned about the impact of climate change on their kids". The contributions ranged in length and detail.

Comments on the impact of Rosebank on future generations

Many of the contributions raised intergenerational fairness and concern for their children's future as a result of climate change. For example, that we do not need new oil and gas if we want a liveable future. They also raised climate anxiety.

Many centred on the six points from the Stop Rosebank campaign website (or other points summarised above); with some respondents raising some or all of the following points from another campaign response below:

1) Economic / Cost of Living:

Approving Rosebank won't lower our energy bills or increase the UK's energy security because:

- Around 80% of oil produced is exported, and the private companies that own the fields are not obliged to sell to UK energy suppliers.
- The UK electricity price is set by the price of gas, so even if we generate 23 hours of electricity from renewables (the cheapest source), but the 24th hour comes from gas (the most expensive), the electricity price for the whole day is set at the higher gas price. For example, in 2021, gas set the electricity price 98% of the time, even though it only supplied 40% of electricity generation across the year. We need more renewables not less.
- Any newly issued oil and gas licences will take around 28 years to start producing, so even if the UK got to keep North Sea oil and gas it won't make a difference to prices for nearly three decades.

2) Environmental

- The Intergovernmental Panel on Climate Change state clearly: if we want a liveable planet, there is no future for coal, oil and gas. That includes oil from Rosebank.
- The Rosebank oilfield is next to a marine protected area and threatens endangered species of dolphins, whales and fish. This would be from loud drilling, seismic blasts, construction, harm to the sea bed and potential oil spills.

3) Fairness

- The UK government currently provides £17.5 billion in fossil fuel subsidies and support to both the fossil fuel industry and UK consumers. At the same time, UK fossil fuel companies (BP & Shell) made a combined total of £26.2 billion in profits; while UK energy bills remain on average about £600 a year higher than they were before the invasion of Ukraine, leaving many households struggling to pay.

- We have dwindling fossil fuel reserves in the North Sea - about five years of oil, and 18 months of gas at current usage rates. We need to be training and supporting oil and gas workers to transition to a growing sector with long term job security, rather than one in decline. (The Net Zero economy grew three times faster than the general UK economy in 2023-2024.)
- The emissions from Rosebank would mean the UK would not meet its climate goals, and produce more CO2 than the 28 poorest countries in the world.