R0001

Hi,

I would like to formally register my disapproval about the proposed Rosebank Field Development. The enormous amount of carbon dioxide that would be generated from the fuel extracted puts the world at risk of a greater than 2 degrees rise and billions of pounds in the long term impact of avoidable climate change. To approve this proposal would fly in the face of all scientific evidence of the need to stop burning fossil fuels and halt the extraction of further oil and gas.

Going ahead with the proposal goes directly against the UK government's public commitment to Net Zero and embarrasses the UK on the world stage, showing us to bea sell out who puts its own short term gain over long term local and global climate impact. There are no positives to the proposal that outweigh the long term damage that would be done by the resulting climate change.

I trust that this department does the right thing and does not approve this horrendous proposal.

[]

UK Citizen

R0002

Dear Ed Milliband MP,

Rosebank = 254 million tonnes of carbon dioxide.

That is a lot.

The carbon budget for for an 83% chance of being able to keep below 1.5 degrees (if we somehow magically stopped all future emissions overnight) was lost two weeks ago. The 50/50 threshold will be gone by 2027. Where are we heading? Somewhere between 2.5-3.5 degrees most likely. A disaster.

The accounting quackery Equinor have tried to play in their latest environmental impact assessment is a joke - well it might be funny if it wasn't so depressing.

How they can sit there and pretend that 249 MILLION TONNES worth of carbon is "insignificant" just makes me want to smash my head against a wall.

Please stay in touch with reality

Please uphold the promise you made to your voters

Please protect us against this madness.

Stop Rosebank

[]

R0003

Dear Sir/Madam

I am writing to object to the proposed development of the Rosebank field by Equinor and Ithaca.

The climate crisis is probably the biggest threat facing humanity. We are already experiencing longer and hotter heatwaves, more droughts, more wildfires, and increasingly devastating storms, flooding and other extreme weather events. And that is just at 1.3 degrees of global warming.

The disclosure by Equinor of the monstrous scale of the emissions that would arise as a consequence of the burning of the Rosebank oil confirms that the project should not go ahead. The science is clear - the only safe place for fossil fuels is to leave them in the ground.

Exploiting Rosebank will not help UK energy security or energy bills - the oil will simply be sold to the highest bidder on the open market.

And this is also about climate leadership. If we are to retain a liveable planet, we need other countries to also decarbonise. How can we possibly ask them to do so, if we continue to open new oil fields?

Please do not approve this application.

Best regards

[]

R0004

To whom it may concern,

Re: ES/2022/001

I am writing to express my concern over the proposed drilling of the Rosebank oilfield in the North Sea. It has just been announced that the world has reached its first catastrophic global tipping point, in light of which it is clearly suicidal to dig up more oil to burn.

I am an artist in my early thirties. Until recently, I had hoped to have a child in the next few years; but now, looking at the way that governments and big businesses are ignoring all the danger signs and continuing to pump carbon into the atmosphere, I feel less and less like I can make that decision in the hope of my child having a liveable world in which to grow up. What sort of government is it that puts the profits of companies like Equinor above the survival of its people?

I urge the government to take the only reasonable option here. More oil is not needed. A liveable planet is.

Yours in hope and desperation,

[]

R0005

Hello - I write to strongly SUPPORT the proposed development of the Rosebank offshore oil & gas development submitted by Equinor UK Limited.

It is essential for the United Kingdom's cost of living crisis, economic development, public sector revenues and creation of local jobs that this proposed development must proceed by helping supply the

UK with lower cost energy. Particularly when it comes to gas supply this will be invaluable to support this country's transition away from burning coal and unsustainable wood pellets

It is essential for the United Kingdom to further develop its natural resources in a sustainable and efficient way rather than relying on shipping foreign oil & gas from long distances.

Kind regards

[]

R0006

This representation included an email thread between scientists. The key points are extracted below:

While they [Equinor] cite the paper [in Earth System Science Data (ESSD)], I don't really see any line of logic that they're using to defend their emissions in the context of it. The UK's equal per capita fraction of the remaining budget is around 1.1GtCO2, so a new development emitting 0.25 GtCO2 would account for almost a quarter of it, which really does not support the implication of irrelevance. In practice, the oil produced there

would probably mostly be consumed outside the UK, so the real argument would be more complicated - plus, by the time the project starts, 1.5C may already be out of reach entirely. However these numbers (projected emissions and remaining budget) are not particularly close together in the report, nor even given in the same units, and there is no comment linking them, so I'm not even sure that the link is stated strongly enough to push back on.

They [Equinor] acknowledge the IEA 2050 1.5C compatible net zero scenario in their analysis [1] but fail to mention one of the key headlines in that scenario, which is ***no need for investment in new fossil supply.***

There is also ample scientific literature that states that current and planned fossil fuel developments (as far back as 2019) would more than exhaust the 1.5°C carbon budget [2,3]. These analyses were also done before the remaining carbon budget calculation was methodologically revised and lowered [4] and annually updated taking account recent emissions (as in the ESSD paper [5]).

According to the report, Rosebank will still be producing in 2050, so domestically this also shifts the onus of carbon removal on to somebody else if the UK is to be net-zero GHG in 2050.

[1] IEA 2021 Net Zero by 2050 – Analysis - IEA

[2] Tong et al. 2019 Committed emissions from existing energy infrastructure jeopardize 1.5 °C climate target | Nature

[3] Kühne et al. 2023 “Carbon Bombs” - Mapping key fossil fuel projects - ScienceDirect

[4] Lamboll et al. 2023 Assessing the size and uncertainty of remaining carbon budgets | Nature Climate Change

[5] Forster et al. 2025 ESSD - Indicators of Global Climate Change 2024: annual update of key indicators of the state of the climate system and human influence

RECEIVED
20/10/25.
1 of 4

FORMAL OBJECTION TO ROSEBANK FIELD DEVELOPMENT

Reference Number: ES/2022/001

To: Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
Department for Energy Security and Net Zero
AB1 Building
Crimon Place
Aberdeen AB10 1BJ
Scotland

Date: 18 October 2025

From: [redacted]

[redacted]

[redacted]

[redacted]

OBJECTION TO ROSEBANK OFFSHORE PETROLEUM ACTIVITIES APPLICATION

Dear Sir/Madam,

I am writing to formally register my **strongest possible objection** to the petroleum activities application for well drilling, unloading, and offshore storage operations at the Rosebank Field Development (Reference: ES/2022/001).

GROUNDS FOR OBJECTION

1. FUNDAMENTAL INCOMPATIBILITY WITH CLIMATE COMMITMENTS

The Rosebank development is fundamentally incompatible with the UK's legally binding climate obligations:

[redacted]

- **Scale of emissions:** Burning Rosebank's 500 million barrels of oil and gas would produce over 200 million tonnes of CO2 - **more than the combined annual emissions of all 28 low-income countries in the world**
- **Paris Agreement violation:** The International Energy Agency has been explicit that no new oil and gas fields are compatible with limiting global warming to 1.5°C
- **Net Zero contradiction:** This development directly undermines the UK's Net Zero by 2050 target
- **Scientific consensus ignored:** Over 700 UK climate scientists have publicly opposed new oil and gas developments, yet the government proceeds regardless
- **Climate Change Committee concerns:** The UK's own independent climate advisers have stated that support for expanding fossil fuel production means the UK is "no longer a climate leader"

The recent Court of Session ruling (January 2025) found the previous Rosebank approval unlawful precisely because it failed to account for Scope 3 emissions. This new application must not repeat that failure.

2. UNACCEPTABLE ENVIRONMENTAL AND MARINE RISKS

The proposed offshore storage and tanker transfer system presents serious environmental hazards:

- **Inferior infrastructure choice:** Most North Sea facilities use direct pipelines to shore, which are safer and more efficient. The choice of offshore storage vessels and tanker transfers appears driven by cost-cutting rather than environmental protection
- **Spill risk:** Vessel-to-vessel transfer operations carry significant risk of marine pollution in sensitive waters
- **Protected marine areas threatened:** The field sits close to protected marine areas, with drilling and construction threatening endangered dolphins, whales, and ancient seabed ecosystems
- **Long-term contamination risk:** 25 years of operations with floating storage significantly increases cumulative environmental risk

3. ECONOMIC INJUSTICE TO UK TAXPAYERS

This project represents an appalling misuse of public funds:

- **Public pays, corporations profit:** UK taxpayers will subsidize approximately 90% of development costs (over £500 million) through tax breaks, while Norwegian state-owned Equinor and its partner Ithaca Energy reap the profits
- **Net loss to UK:** Analysis shows the UK government will face a net loss of over £250 million, while Equinor and Ithaca gain £1.5 billion in profit
- **No energy security benefit:** Approximately 90% of Rosebank's reserves are oil that will be exported and sold on international markets at market prices
- **No bill reduction:** This oil will do nothing to lower UK fuel bills - it merely enriches a foreign state-owned corporation
- **Opportunity cost:** These subsidies could instead fund renewable energy infrastructure creating far more long-term employment

4. ETHICAL CONCERNS

[redacted]

There are serious ethical issues with this development:

- **Links to illegal settlements:** Ithaca Energy's majority owner, the Delek Group, has been listed by the UN amongst businesses enabling and profiting from illegal Israeli settlements in Occupied Palestinian Territory
- **Profiting from human rights abuses:** An estimated £253 million in revenue from Rosebank could flow to a company implicated in violations of international law
- **Intergenerational injustice:** This decision sacrifices the future of young people and future generations for short-term profit.

5. FAILURE TO CONSIDER ALTERNATIVES

The application fails to adequately consider alternatives:

- **Renewable energy investment:** The same investment could accelerate deployment of offshore wind, solar, and tidal power
- **Energy efficiency:** Nationwide retrofitting programs would reduce energy demand more cost-effectively
- **Just transition:** Investment should focus on retraining oil workers for renewable energy sectors rather than locking them into declining industries
- **Viking Wind Farm misuse:** Reports suggest Equinor may use the Viking Wind Farm to "electrify" the FPSO - meaning renewable energy that could power hundreds of thousands of homes would instead be used to extract more fossil fuels

SPECIFIC CONCERNS ABOUT PROPOSED OPERATIONS

Offshore Storage and Unloading

The proposed use of offshore storage facilities and regular tanker transfers is particularly concerning:

- Why has pipeline infrastructure to shore been rejected when it is standard for many North Sea operations?
- What are the emergency response procedures for spills during transfer operations?
- How will storage vessel integrity be maintained over 25 years of North Atlantic weather?
- What are the cumulative environmental risks of hundreds of tanker visits to the site?

Scope 3 Emissions Assessment

Following the Court of Session ruling, this application must include comprehensive Scope 3 emissions assessment:

- Has the full lifecycle carbon footprint been calculated?
- How can burning 200+ million tonnes of CO2 be justified against the UK's carbon budgets?
- What mitigation measures are proposed (and why should mitigation be accepted when the solution is to not extract)?

[redacted]

THE PUBLIC INTEREST DEMANDS REJECTION

As Lord Ericht stated in the recent Court of Session judgment: **"The public interest in authorities acting lawfully and the private interest of members of the public in climate change outweigh the private interest of the developers."**

The science is unequivocal. The economics are against UK interests. The environmental risks are unacceptable. The ethics are questionable.

REQUESTED ACTIONS

I formally request that the Secretary of State for Energy Security and Net Zero:

1. **REJECT this application in its entirety**
2. **Prioritize renewable energy investment** over fossil fuel extraction
3. **Implement a just transition plan** for North Sea workers into renewable energy sectors
4. **Redirect the £500+ million in proposed subsidies** to renewable energy and energy efficiency programs
5. **Uphold the UK's climate commitments** by refusing all new oil and gas field developments
6. **Consider the public interest** as defined by Lord Ericht's judgment

TRANSPARENCY REQUEST

I request:

- Written confirmation of receipt of this objection
- Notification of how public submissions will be weighted in the final decision
- Publication of all objections received (anonymized if necessary) to demonstrate public opinion
- Clear explanation of the decision-making criteria being applied

CONCLUSION

Rosebank represents everything that is wrong with current energy policy: it sacrifices climate stability, enriches foreign corporations at UK taxpayers' expense, exports the oil overseas, threatens marine environments, and contradicts the UK's stated climate leadership.

This application must be rejected.

The UK government faces a defining choice: honour its climate commitments and protect the public interest, or prioritize the profits of a Norwegian state oil company over a liveable future.

I urge you to choose the former.

Yours f[redacted]

R0008

I wish to object to the Rosebank oilfield exploration.

The issues against are well known but I, for one, would feel emasculated when discussing climate change with anyone abroad. Why should those who work hard with the best intentions to prevent climate disaster be shot in the foot?

Unpopular as it was, the UK largely stopped mining coal, it must stop mining all carbon. It might mean continued austerity (I, for instance, have no car or smartphone and less that £100 in the bank) but we can still survive and remain comparatively wealthy compared with most other countries.

Sincerely

[]

R0009

Hi, I wish to register my objection to ES/2022/001 Rosebank oil field. Any new extraction of oil is contrary to net zero and climate change law and policy.

Regards

[]

R0010

I would like to express my concern over Equinors appeal of the government's previous decision on this oilfield

It would be a a huge retrograde step to grant approval and would make achieving our net zero targets impossible.

There own estimates of CO 2 produced by this development, would do untold damage which future generations will be left to deal with and any talk of offsetting for such large volumes of CO2 is unrealistic.

The only route to lower energy bills and energy security is to continue to invest in green energy. The only people who will profit from this development will be investors in Equinor.

This government needs to stand firm on this issue at a time when meeting out commitments to the Paris Climate agreement has never been under greater threat With other governments turning away from that agreement we must show leadership a

commitment to do what the world knows is needed. Using a loophole created by the previous decision shows this companies true colours .

This government must continue to turn away from fossil fuels and continue investing in the transition to the green economy and Jobs.

They must also continue to protect the seas and delicate marine environments that this development would put at risk.

I implore you to again turn down this application.

Yours sincerely

[]

R0011

Dear Regulator

Reference ES/2022/001

I am writing as a Scottish based UK voter to register my serious concerns regarding the potential exploitation of the Rosebank Oilfield. In my view this goes against the UKs net zero obligations and should not be permitted.

Yours sincerely

R0012

I am one of I'm sure many people reaching out to voice my opinion and state categorically that the general population will not benefit from the development of this oil field.

1. Scientists and experts have warned time and time again that we cannot allow any more new oil and gas if we are to keep within safe climate limits. Just burning the fossil fuels in existing UK oil and gas fields will contribute to pushing us past "safe" climate limits. Adding new reserves, like Rosebank, will bust UK climate targets and push us closer to more parts of our world becoming uninhabitable. Burning Rosebank's oil and gas would produce over 200 million tonnes of CO2, more than the 28 lowest-income countries produce in a year combined.

2. Rosebank is a bad deal for the UK. New oil and gas projects like the Rosebank oil field won't lower our energy bills, or make our energy supply more secure. Most of the UK's oil and gas is sold on the open international market to the highest bidder, bringing in profit for oil and gas companies whilst millions of people across the country struggle to

pay their energy bills. On top of that, the UK public would effectively carry almost all the costs of developing Rosebank, with the field's owners, Equinor and Ithaca, receiving billions of pounds in tax breaks.

3. New fields like Rosebank won't stem the decline of jobs in the North Sea, because the North Sea basin is in terminal geological decline. The number of jobs supported by the oil and gas industry in the UK has more than halved in the last decade, despite new fields being approved. In a declining basin, the only way to create long term, secure jobs is to invest in a just transition and support workers into clean energy industries that have a future. Doubling down on oil and gas is not the solution to secure, long-term jobs for UK oil and gas workers.

Instead of new fossil fuel projects we urgently need a plan for a just and properly funded transition for oil and gas workers and the communities that depend on them. We need real solutions to tackle Britain's broken energy system, including scaling up renewables and insulating our leaky homes.

R0013

Dear OPRED,

I wish to express my opposition to exploring and licensing the Rosebank oil field. Not only is this flying in the face of all efforts to move to sustainable energy, it is also supporting an Israeli regime which is violating the human rights of Palestinian civilians.

Yours sincerely,

[]

Retired Pharmacist

R0014

Dear Mr. Miliband,

I shouldn't be surprised by the ruthless second attempt by Equinor to develop Rosebank oil field off the UK coast: it's the nature of just how ruthless and greedy this industry is and it appears the oil lobbyists have been enjoying regular access to Labour policy makers which is pretty dismal. The Uk has legal targets to meet, there's been record levels of global emissions this year and last and states seem very paralysed in the face of this. Why? Partly because of the relentless pressure from oil lobbyists in Parliament to pump out the "oil is necessary for growth and security" message (untrue) but also

because the concept of "growth" more widely and indeed energy "security" seems to be falsely linked to oil. It's incredibly deceitful to claim oil provides "security" - be this economic or ecological - on the contrary, economists and MPs of all kinds make a serious, critical error by refusing to factor in the costs of damage to climate/nature in mainstream cost/benefit analysis. The fault is also in the way these cost/benefit analysis methodology is carried out: we cannot carry on pretending that, for example, the act of flying involves only one cost as there's second cost which is too often factored out and pushed out of the mass consciousness.

Ask yourself Mr. Miliband: why is it that necessary state intervention in how we get energy, what is taxed and how is too often seen as so "Socialist" and wealth inhibiting when actually fair green taxes and new policy from Labour could actually help finance not only green transitions but also help pay for rising costs of social care, NHS. Too often tax itself is presented and framed as this "barrier to wealth creation" when again, taxes could be seen as contributions to costs of climate damage. A good example of Labour's seeming reluctance to directly intervene in open markets for cheap, polluting flights (demand for these is rising to scary degree) is the TOTAL ABSESENCE THUS FAR OF A BILL/LAW ON A FREQUENT FLYER LEVY. Yet such a tax, applied globally, could raise needed tax revenue along with a global tourist tax, for example. Sir Keir Starmer's claim that green transitions are just too costly and so targets have to be abandoned is obscene as a wealth tax on those with more than ten million could raise more than 23 billion a year. Labour must PORTRAY GREEN TAXES AS CONTRIBUTIONS TO COSTS OF DAMAGE.

Equinor have just attempted to account for emissions, trying hard to appear more green and responsible but it's hogwash, frankly - a monumental con job and if they get their way other oil companies will become emboldened, further destroying Labour's credibility on the climate. Sections of Labour seem to still think that the only way the Uk can achieve growth is more roads, more runways (Rachel Reeves too?) and again, it's Never never land, disjointed, outdated economic theory as seen in the 19 century, a kind of horse blinker syndrome that refuses to see that even with greener plane fuel use (which is good) - the rapid increase in flights will still not mitigate the overall increase in emissions. It's just a false economy, a serious error in thinking.

Please don't allow Equinor to spin some line about environmental responsibility: no amount of impact statements can gloss over more emissions. Please uphold Labour's credibility, please uphold the state's rightful role in protecting and serving all. It's a scandal that oil lobbyists even CONTINUE TO HAVE ACCESS TO PARLIAMENT as the climate crisis and related high wealth inequality is so serious. Make Manyard Keynes fashionable again, please make the case that it is green energy that is kinder to pockets and planet and that the UK's "energy security" is best supported by its own capacity for re-newables - not relying upon Equinor and Putin for reckless more oil. Equinor may well

have honed their impact assessment (who knows if it's truthful or accurate?) but a ruling previously about the illegality of its operations as well as the UK's legally binding targets SHOULD HOPEFULLY CONCERN YOU GREATLY.

Oil companies & their lobbyists have had their day and have got very crafty in their corporate wording and millions of voters will no longer trust Labour on climate if they see Labour being seduced by the false promises of Big Oil. Voters are crying out for a bold, fair, innovative, joined up Labour who is unafraid to pioneer such global taxes, who can make moral, economic and ecological cases for state intervention. Currently I argue states are pretty much paralysed: will you stand back and let oil destroy eco systems, livelihoods, markets for food, home insurance? Growth, climate protection AND overall less wealth inequality is possible and there must equally be urgent cross party consensus on the above named taxes.

Be the change please, Mr. Miliband. You have achieved much with the green energy company in Glasgow but people hope you and others will see through the tactics of big oil. The concept of "security" in economic thinking critically factors out ecological security when actually the climate crisis is so severe that the two types or three types of "security" must be integrated far more. BREAKING NEWS: The world's first case involving citizens suing an oil company for damage due to a severe hurricane is on the horizon…these cases are costly as is the cost of climate damage.

Thank you for reading this

Sincerely

[]

R0015

Dear Sir/Madam,

I am writing to oppose the approval of the Rosebank Oil field. I live in []

I am a climate policy researcher []. I can say with absolute certainty that the development of this oil field is not aligned with the UK's climate commitments of net-zero by 2050.

The latest assessment from Equinor indicates this oilfield will emit 249 million tonnes of CO2 by 2050. That is more than 50 times their original estimation of 4.5 million.

250 million tonnes is roughly equivalent to the annual emissions from Spain. It is also equivalent to many years of emissions from some of the world's most climate vulnerable countries. For example, it is equivalent to 25 years of emissions from Mozambique, which is a highly vulnerable nation.

To develop this oil field would be deeply unjust given the UK's historical emissions. It would not be in keeping with our international obligations and commitments. It is particularly grotesque given the UK's history of colonisation in many of the countries that will be most affected.

Nor would it benefit UK citizens. The oil & gas produced by Rosebank is not fit-for-purpose in the UK energy market. This means it will be exported and will not lower gas prices for the average UK family. The income will be largely concentrated in foreign, private companies.

This means British people will be destroying our international reputation, reneging on our climate commitments, and creating an unsafe future for our citizens just so that a foreign, private company can make profits. Given existing tax loopholes, it is unlikely these profits will contribute to UK tax income.

I can see no reason for Rosebank Oil Field to go ahead. It will not make life better for anyone in the UK (except a small handful of extremely wealthy people), and it will actively make life worse for future British citizens and those living in more vulnerable countries.

Thank you for your time and consideration.

Yours faithfully,

[]

R0016

Dear Sir/Madam,

I am writing in response to the public consultation open on Rosebank oil field. My message is simple - I am vehemently opposed to Rosebank for the following reasons:

- It contravenes the UK's climate change goals - why set these if they're to be broken?
- It will not guarantee energy security/lower energy bills, quite the contrary. Oil/gas is traded on the global market which is subject to a huge number of influences, and 90% of the oil produced at Rosebank is likely to be exported. Only UK developed renewables will do this.
- Developing company Equinor stand to earn £bns from the scheme, adding to their £bns of profits anyway - I found this short video [1] impactful. What is more, co-developer Ithaca Energy is majority owned by Delek Group who have been blacklisted by the UN for human rights concerns over business in Gaza.

Why we should be pursuing toxic fossil fuels which are shown theoretically and in practice to cause climate change (look at our climate) is an enigma. The talk of Carbon Capture and Storage is also to me a sticking plaster on a gaping wound. Billions if not trillions have been thrown at this since 1972 which has not yielded much more than a demonstration project. This, added to the increased cost to harvest oil as it gets further out of reach, makes the cost to citizens way more than renewables would ever be. I appreciate you cannot just stop oil but there needs to be sense, and a serious transition plan.

[]

Kind regards,

[]

[1] https://www.facebook.com/reel/24924790700520788

R0017

Dear Secretary of State for Energy Security & Net Zero and OPRED

First of all I want to say how grateful and relieved I was that the previously unlawfully granted consent by the UK Government and the North Sea Transition Authority for the two new Scottish oil and gas fields was quashed 30 January 2025.

I also want to thank you for adhering to the advice of Lord Ericht: that there is a public interest in having the decision [to allow new oil and gas in the North Sea] "remade on a lawful basis", taking into account 'downstream' or 'Scope 3' emissions as well as those generated during extraction because of the effects of climate change - which he said outweighed the interests of the developers.

In my opinion, the decision was flawed in MANY respects, and I hope that you will now also FULLY consider ALL of the other reasons for opposing the development plans.

Equinor and Ithaca Energy not to be trusted

Prior to securing the original approval for Rosebank, I understand that Equinor were partly responsible for watering down the windfall tax - a mechanism that could have helped to accelerate the growth of renewable energy in the UK (https://www.desmog.com/2023/10/27/chancellor-jeremy-hunt-told-equinor-to-work-with-us-on-oil-and-gas-messaging).

By continuing with their plans to develop the Rosebank oil and gas field, Equinor and Ithaca Energy not only dismiss all of the climate science and advice from many organisations such as the International Energy Agency (IEA) and the UK Climate Change Committee (CCC), they also ignore and dismiss numerous, very justified public protests.

According to Equinor, the "full impact" of the Rosebank field ALONE is estimated to contribute an additional 249 million tonnes of CO2 over the next 25 years - more than 50 times greater than Equinor's original figure of 4.5 million tonnes.

Equinor’s marketing department presents the company as “committed to the energy transition”, but in 2023, according to its annual report, 99.85% of the energy it produced was in fossil fuels. Just 0.15% of the energy it produced was renewable. In fact, the UK’s advertising regulator recently banned the company from repeating its suggestion that wind farms play a balanced role in its energy mix, stating that the ads were “likely to

mislead the contribution that lower-carbon initiatives played in the overall balance of the company's activities" (as quoted in the Financial Times, 22 December 2023).

In its response to the Advertising Standards Authority, **Equinor even told the regulator that its adverts (subsequently banned) were deliberately targeted at policymakers in the run up to a decision on the Rosebank oil field!**

To see this intent in action, you need only view the agenda for Politico's Energy & Climate UK Summit on 16 May 2024 … the "future technology of Carbon Capture & Storage (CCS)" will be presented as a key pillar of the "strategic blueprint" that will guide the UK towards its net zero goals. This is highly questionable, given that the Intergovernmental Panel on Climate Change (IPCC) had identified CCS as one of the LEAST EFFECTIVE, and MOST EXPENSIVE, methods available to reduce emissions (2022 Summary for Policymakers). The current global carbon capture capacity represents about 0.1% of annual carbon emissions, and the combined capacity by 2030 of all proposed CCS projects currently in the planning stage would only be capable of capturing less than 1% of global fossil emissions. Moreover, most CCS projects are in development in order to enable the production of MORE fossil fuels, not less; nearly 75% of CO2 captured annually is re-injected into oil fields to get more oil out of the ground! (See Global CCS Institute's "Global Status of CCS" 2022 report, their CO2RE facilities analysis page, and the Institute for Energy Economics and Financial Analysis' report "Carbon capture: a decarbonisation pipe dream", September 2022, for more information)

Truly tackling the climate crisis means investing in **proven, scalable and affordable renewable energy projects** - not CCS, which is a smokescreen for further fossil fuel production.

As for Ithaca Energy: it is part of Delek Group - a corporation black listed by the UN for its part in the **'ethnic cleansing' of Palestinians**. If approved, Rosebank could send almost a quarter of a billion pounds to Delek Group, which is also known to provide fuel to the Israeli military which has murdered over **70,000** men, women and children since 7 October 2023. Obviously the Palestinian-Israeli conflict did not start 7 October 2023, and it is estimated that Israel - with the help of corporations like Delek Group - has murdered **more than 154,000** since the Nakba in 1948.

By ignoring its obligation to help prevent genocide and worse - by providing diplomatic cover, intelligence and arms to Israel - the UK government already appears to be abetting the genocide of the Palestinian people. Approving the Rosebank development would be seen by many as further complicity in that heinous war crime.

Lies and scare tactics

Fossil fuel companies like Equinor, Ithaca Energy and Shell often use lies and scare tactics in order to secure developments - all of which can and have been debunked. For example:

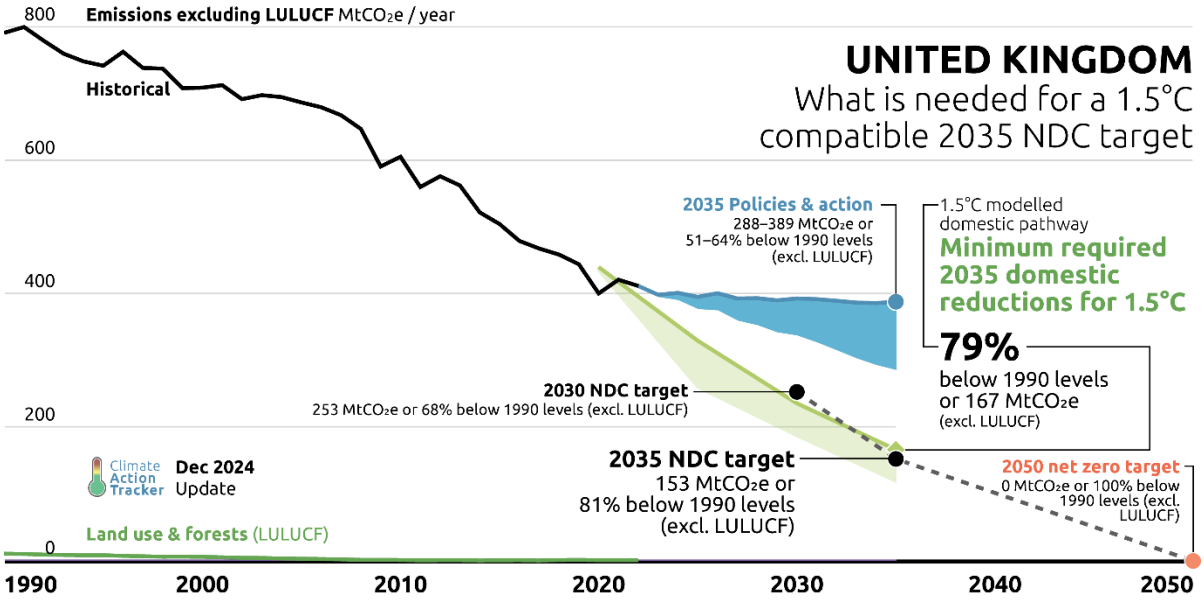
- If approved, Rosebank and Jackdaw would not drive down British consumers' bills as claimed. In fact, when ALL costs and subsidies for the lifetime of the project are taken into account, such developments could cause energy bills to increase.
- If approved, Rosebank and Jackdaw would not increase our energy security. At least 80% of the oil and gas produced would be sold on the international market and exported.
- If approved, Rosebank and Jackdaw would not create thousands of jobs. In fact analysis suggests the actual number of jobs will fall regardless.

Risks and costs

- At least 1,147 people in the UK died from climate-fuelled heatwaves this summer. More new climate-wrecking oil & gas would only make things worse (https://www.independent.co.uk/climate-change/news/doncaster-imperial-college-london-birmingham-manchester-city-centre-people-b2827972.html).
- All profits from new climate-wrecking oil & gas would go abroad … and even help to finance the genocide of Palestinians.
- The public purse could further lose out as a result of subsidies and tax loopholes. For example, estimates suggest taxpayers could effectively cover over 84% of the development costs for Rosebank (Norwegian energy giant Equinor + British/Israeli Ithaca Energy) and that the UK Treasury might lose a net amount of over £250 million - effectively shifting the financial risk from developers to the UK public. The same would apply to Shell's Jackdaw development.
- The economies of states that are heavily invested in the fossil fuel industry will be plunged into chaos when the fossil fuel bubble inevitably bursts and flawed climate models and predictions are eventually corrected, causing fossil fuel investments to become **stranded assets**. The UK simply can't afford to increase

that risk to its economy, and to savings and pensions, by ploughing more public money into the sector. Read https://carbontracker.org/wp-content/uploads/2025/03/DICE-PM-Brief-March-2025.pdf and https://carbontracker.org/reports/loading-the-dice-against-pensions for more related info.

- More new climate-wrecking oil & gas would mean even more homes would become **uninsurable** as a result of the increased risk of storm damage, etc.
- More new climate-wrecking oil & gas would further increase home and business insurance costs, which in turn would also affect our economy.
- Allowing more new climate-wrecking oil & gas would not be consistent with meeting the UK's international and national targets to reduce carbon emissions.
    - The remaining global carbon budget to limit warming to 1.5°C is extremely small and rapidly shrinking, amounting to just three years' worth of present global emissions, and there is significant evidence that burning all oil and gas in EXISTING fields globally would exceed the 1.5°C global limit. Rosebank alone contains an estimated 300-500 million barrels of oil, making it the largest known untapped field in UK waters. The climate pollution from burning Rosebank's reserves would be more than the combined annual CO2 emissions of all 28 of the lowest income countries in the world.
    - According to independent analyses from groups like the Climate Change Committee (CCC) and Climate Action Tracker, **the UK government is not on-track to meet legally binding carbon budgets or NDCs**, and there is NO WAY that the UK can meet those targets and stay within safe climate thresholds by approving NEW oil and gas.



https://climateactiontracker.org/countries/uk/2035-ndc

- Permitting more new climate-wrecking oil & gas would put the UK's already fragile **overseas reputation** at risk - such a shame, when previous Labour governments led the way with significant climate policy, most notably the Climate Change Act 2008, which introduced the first legally binding framework for reducing the UK's carbon emissions by 80% by 2050, and which established the independent Climate Change Committee (CCC) to advise government and set five-year carbon budgets. This pioneering law encouraged other countries to also step up, and served as a blueprint for climate legislation worldwide - eg in Ireland, Canada, Denmark, Sweden, Mexico, New Zealand and Nigeria and over 60 other countries!
- If the current UK government is now seen to be ignoring legislation and targets, then those other countries may feel that they can do the same … despite the fact that there is no Planet-B!
- More new climate-wrecking oil & gas would increase the likelihood that states - especially those at greatest risk of the effects of climate change - would seek accountability and **compensation** from the UK for its falling commitment to climate action, as per the advisory opinion from International Court of Justice (ICJ).
- **More new climate-wrecking oil & gas puts already endangered and threatened species at risk** - eg dolphins, whales and fish - and not only as a result of warmer seas and extreme weather:
    - Rosebank lies about 80 miles north-west of Shetland, right next to a Marine Protected Area.

- Jackdaw lies about 155 miles east of Aberdeen, and is less than 20 miles from the Fulmar Marine Conservation Zone.
- Loud drilling, seismic blasting, leaks and spills further - and unnecessarily - add to the risks to endangered and threatened species … and to our **tourism industry**.
- The planned gas pipeline from Rosebank to Shetland would cut through a specially protected seabed, harming clams that are some of the oldest animals on the planet.

Labour promises

Before getting elected, Labour made many statements and promises, including:

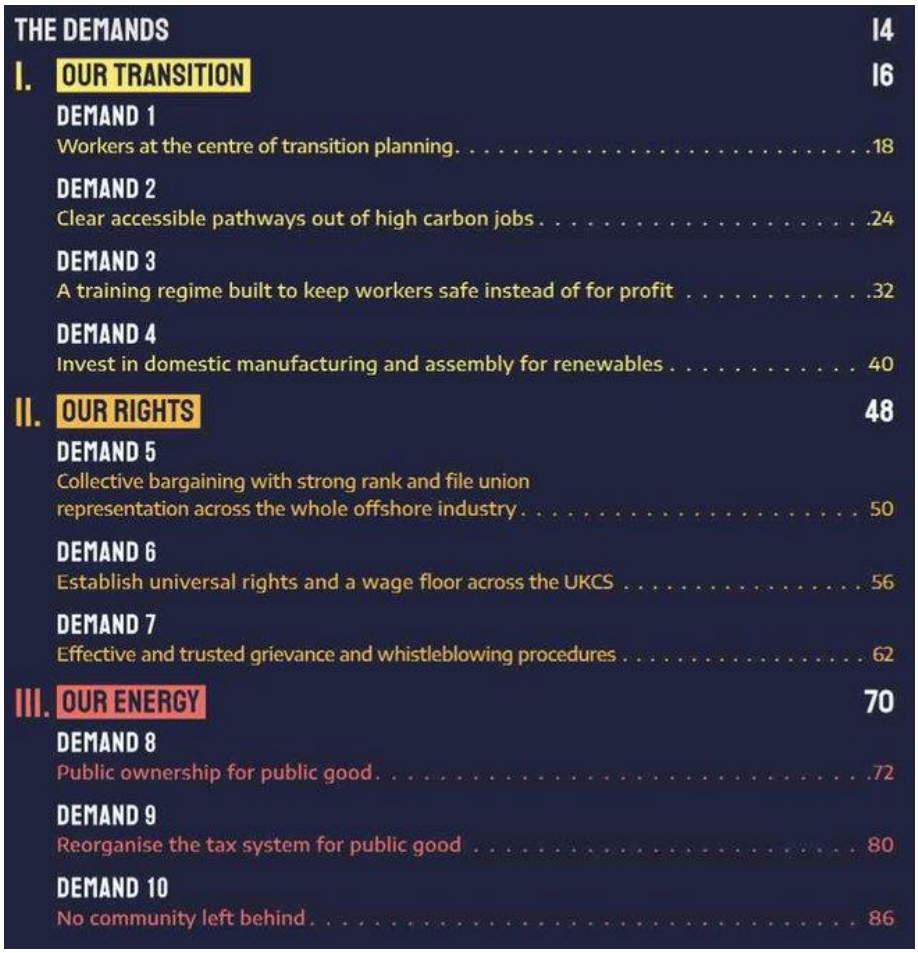
- "The clean energy transition represents a huge opportunity to generate growth, tackle the cost-of-living crisis and make Britain energy independent once again. That is why clean energy by 2030 is Labour's second mission."
- "**We will not issue new licences to explore new fields because they will not take a penny off bills, cannot make us energy secure, and will only accelerate the worsening climate crisis.**"

https://labour.org.uk/change/make-britain-a-clean-energy-superpower

The current Labour Government's stated priority is to **deliver a fair, orderly and prosperous transition in the North sea**. Therefore, rather than wasting money propping up a risky, dying industry, the government should be encouraging and supporting the transition to more secure, safe and better paid jobs

delivering/storing/distributing renewable energy and retrofitting/insulating homes and businesses:

- Contrary to what developers and much of mainstream media would have us believe, **this is exactly what oil rig workers want** - as can be seen in the video **"Offshore"** featuring North Sea oil workers describing their fears for the future of our energy system and wanting us to learn from past mistakes - eg with mining and fishing: https://www.youtube.com/watch?v=BW6FpYjh5mY
- Here's another, shorter video introducing their 10 very reasonable demands: https://x.com/PlatformLondon/status/1632639208266297345



Ordinary people - including those working in the oil and gas industry - are already suffering as a result of exploitation and disinformation from greedy corporate bosses in the fossil fuel industry. This has to stop, and those breaking laws and destroying our environment must be made to pay.

I see the government's decision on Rosebank and Jackdaw as a test of their credibility on public health, workers rights, our economy, and the environment ... and on their ability to unite people and not leave anyone behind on the journey to towards clean energy.

I watch and pray you will do the right thing on behalf of ordinary British people and people of the world.

Yours sincerely

[]

R0018

Good evening,

Here are the top 3 reasons why we need to stop Rosebank:

1. Scientists and experts have warned time and time again that we cannot allow any more new oil and gas if we are to keep within safe climate limits. Just burning the fossil fuels in existing UK oil and gas fields will contribute to pushing us past “safe” climate limits. Adding new reserves, like Rosebank, will bust UK climate targets and push us closer to more parts of our world becoming uninhabitable. Burning Rosebank’s oil and gas would produce over 200 million tonnes of CO2, more than the 28 lowest-income countries produce in a year combined.

2. Rosebank is a bad deal for the UK. New oil and gas projects like the Rosebank oil field won’t lower our energy bills, or make our energy supply more secure. Most of the UK’s oil and gas is sold on the open international market to the highest bidder, bringing in profit for oil and gas companies whilst millions of people across the country struggle to pay their energy bills. On top of that, the UK public would effectively carry almost all the costs of developing Rosebank, with the field’s owners, Equinor and Ithaca, receiving billions of pounds in tax breaks.

3. New fields like Rosebank won’t stem the decline of jobs in the North Sea, because the North Sea basin is in terminal geological decline. The number of jobs supported by the oil and gas industry in the UK has more than halved in the last decade, despite new fields being approved. In a declining basin, the only way to create long term, secure jobs is to invest in a just transition and support workers into clean energy industries that have a future. Doubling down on oil and gas is not the solution to secure, long-term jobs for UK oil and gas workers.

Instead of new fossil fuel projects we urgently need a plan for a just and properly funded transition for oil and gas workers and the communities that depend on them. We need real solutions to tackle Britain’s broken energy system, including scaling up renewables and insulating our leaky homes.

Many thanks

[]

R0020

Carbon Capture, Utilisation, and Storage (CCUS) Consultation - October 2025

[redacted]

I would like to a make a short contribution to Call for Evidence on "Future Network Strategy for CO_2 Transport and Storage" and "Evolution of Economic Regulation for CO_2 Storage". [redacted] In my evidence I would like to draw on two opportunities for synergies between CCUS and other energy systems.

Although retired, having worked throughout my career to deliver optimised energy systems and energy projects including gas storage in the Netherlands and LNG facilities worldwide, I retain an active interest in seeking innovative solutions to help us achieve net zero. To this end I have authored a series of features in [redacted], entitled [redacted], which considers various opportunities from the perspectives of government, industry and the consumer.

As can be seen from both your call for evidence and from the IChemE response, the key challenge for carbon capture and storage is the cost it adds to energy utilisation. Consequently, I offer these two opportunities to reduce costs for both government and the consumer. They draw on the essential chemical engineering skillset of applied systems engineering/ thinking, and are summarised in the two schematics attached.

Using incremental domestic oil and gas production to fund CCUS

The government is under increasing pressure to curtail domestic oil and gas production from new fields, and the latest environmental assessment of the Rosebank field properly includes future scope 3 emissions. Indeed, the granting of a development licence for Rosebank will directly impact the UK's ability to meet its emissions targets. However, the UK will still be dependent upon fossil fuels for many years to come and will therefore need to import energy and incur much of those same scope 3 emissions.

Domestic oil and gas production continues to provide the UK with a significant taxation benefit, through levy of Corporation taxes, a Supplementary Charge and an Energy Profits tax, and the curtailment of new developments will reduce both energy security and future government income.

The government's plans for carbon capture and storage are being established to directly offset carbon emissions from fossil fuel utilisation, and so I would like to suggest that once the costs for carbon capture have been firmly established, taxation income from incremental oil and gas production should be used in part to directly fund the sequestration of equivalent scope 3 emissions. In other words, government policy can neutralise on an equivalence basis the impact of those emissions whilst also reducing the unit cost of carbon sequestration as the scale of its application increases.

Optimising blue hydrogen usage to increase CCUS efficiency and enhance the UK's energy security

The government is rightly pursuing its plans for decarbonisation of our Industrial Clusters as part of its plans for net zero. These plans include ones for the substitution of fossil fuels by hydrogen, and in the first instance, until sufficient green hydrogen becomes available, using blue hydrogen produced from fossil gas, with captured carbon sequestrated. The production of blue hydrogen is proposed to be on a steady state basis, which in turn means that the sequestration can also be achieved with a high load factor and at reasonable cost.

One of the bigger challenges for our energy system is in electricity generation and supply, and the government's plans for Clean Power 2030 rely on utilising more renewable energy. However current plans also include the retention of gas-powered generation to back up renewables against shortfalls, operating with a 5-10% utilisation factor. The installation of carbon capture facilities on these gas-fired units will be expensive and associated sequestration costs will be extortionate due to their low use factor.

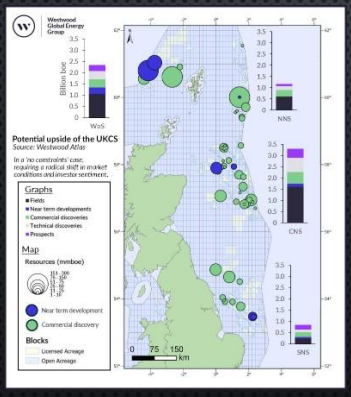
If one looks holistically at the blue hydrogen production and gas-powered generation systems, it will be possible to optimise their operation through a small amount of hydrogen storage. For most of the time the blue hydrogen plant would be producing with a small excess of hydrogen to that required by industrial users sent to hydrogen storage. As and when the gas-powered generation is operated to back up the power grid, the blue hydrogen plant would be turned-down and industrial hydrogen users would revert to using stored hydrogen. This has two advantages: firstly, there is no sudden peaking of sequestration load, and secondly there is no peaking of natural gas demand. Obviously, this would require operational coordination but, building upon the IChemE's proposal for a carbon capture system operator, this coordination could be ensured through such a body.

This integration does require the development of hydrogen storage, but, as we see from the government's long-term plans, hydrogen will be required anyway to balance our future electricity grid, replacing gas-powered units. We should be starting to plan for hydrogen storage now, first in caverns and later in offshore geological structures. Stored hydrogen will allow us to better optimise use of our carbon storage facilities to reduce their cost and substantially reduce natural gas demand during critical periods, greatly enhancing the UK's energy security.

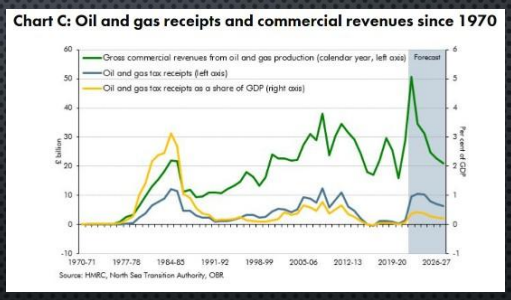
INCREMENTAL UK GAS PRODUCTION PROVIDES FUNDING FOR CCUS?

WHY WE SHOULD STOP IMPORTING GAS TO THE UK AND PRODUCE IT OURSELVES – VIEWPOINT: TCE JULY 2025

UK 'COULD MEET HALF ITS ENERGY NEEDS' BY SCRAPPING OIL AND GAS LEVY – TIMES 3RD SEPT 2025



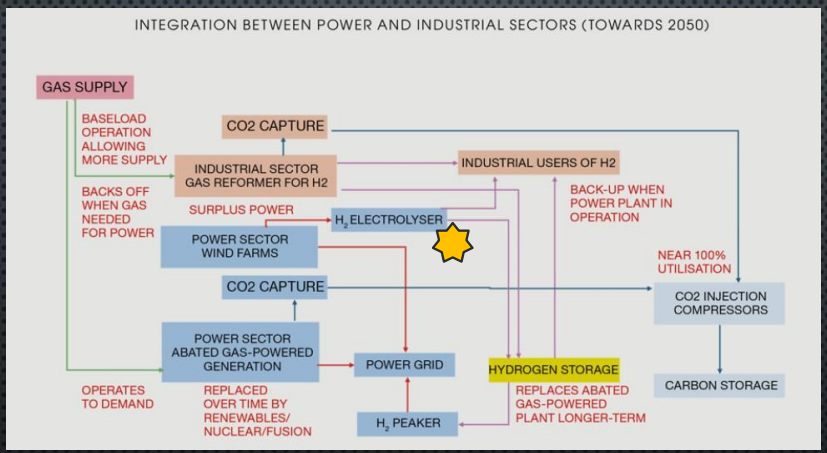
https://www.westwoodenergy.com/news/westwood-insight/westwood-insight-ukcs-geological-potential-remains-but-sentiment-shift-is-needed



https://obr.uk/box/the-evolution-of-north-sea-oil-and-gas-receipts/

ENVIRONMENTAL CONCERNS FOR EXTRA GAS ***OFFSET*** BY MATCHING SCOPE 3 EMISSIONS TO CCUS

INTEGRATION WITH FUTURE POWER & HYDROGEN?



The Chemical Engineer https://www.thechemicalengineer.com/features/pathways-to-success-assessing-neso-plans-for-clean-power-2030/

INTEGRATION CAN SMOOTH OUT UK GAS CONSUMPTION AND OPTIMISE USE OF CARBON NETWORK AND STORAGE

OXYGEN PRODUCED FROM ELECTROLYSIS CAN REDUCE COST OF STEAM REFORMING

R0021

Thank you for opening a public consultation on the subject of whether or not the Secretary of State for Business, Energy and Industrial Strategy should agree to the grant of consent to approve the development of the Rosebank oil field.

Please can I urge the Secretary of State NOT to agree the grant of consent. Sadly, Equinor's assurances in the Environmental Statement that "Rosebank Development concept....supports the UK's net zero target" (P12) is pure fantasy. The science is very clear, to keep to/ below 1.5 degrees of warming we need to reduce global greenhouse gas emissions dramatically and rapidly and reach net zero mid-century. This is why the UK rightly has ambitions targets set into law to achieve 100% reduction in emissions by 2050. Rosebank however is set to produce enough oil and gas to produce 250 million tonnes of CO2 (as this is burned) over 25 years. Scientists have clearly shown [1] that any development of new oil/ gas fields globally will push the world over the 1.5 degree limit, as there is already enough oil/ gas left in all the developed fields to exceed 1.5 degrees.

The Climate Change Committee [2] advises that limiting the expansion of fossil fuel production must be a key priority for the UK government and that "UK policy on future oil and gas production should be aligned with Global Stocktake calls to accelerate the transition away from fossil fuels".

I am sure I don't need to tell BEIS why limiting climate change matters- the floods, droughts, fires, heatwaves etc in the UK and globally should be reminder enough. We have the tools to limit the death and destruction from getting much, much worse; sometimes that will mean saying no to things, alongside investing in new projects and technologies. Please, Secretary of State, in this instance use your power to say NO

Kind regards

[]

[1] https://www.ucl.ac.uk/news/2025/jun/new-oil-and-gas-fields-incompatible-paris-climate-goals

[2] https://www.theccc.org.uk/wp-content/uploads/2024/07/Progress-in-reducing-emissions-2024-Report-to-Parliament-Web.pdf

R0022

To: Secretary of State

re: Rosebank

The Labour government has pledged that no new oil or gas fields will be given permission to extract more fossil fuels from the ground.

If a decision is made to allow Rosebank to go ahead the party and the government will lose all credibility.

The damage to the climate that will be done by the continued burning of fossil fuels cannot be justified under any circumstances.

[]

R0023

The Rosebank Oil Field is unsafe and incompatible with our climate goals. Scientists have consistently warned that governments cannot permit the development of new oil and gas sources if we aim to limit global warming to 1.5°C. The Rosebank project will undermine the UK's climate goals and push us closer to a future where more parts of our world become uninhabitable. The oil and gas extracted from Rosebank would produce more CO2 emissions than the 28 poorest countries combined in a year.

Oil and gas prices are determined by the global market, so increasing domestic production will not lower our bills. Approximately 90% of the fuel extracted from Rosebank will be oil, which is likely to be exported overseas. This situation is not about energy security; even the previous government acknowledged this fact.

Additionally, the UK public will bear almost all the costs associated with developing Rosebank through billions in tax breaks for oil companies. Thanks to a generous tax system, the Norwegian state-owned oil company Equinor and oil company Ithaca will pass the majority of the development costs of the Rosebank oil field onto the UK public. As a result, the public will essentially provide BILLIONS in tax breaks to the owners of Rosebank just to develop the field. Equinor, the UK’s largest gas supplier, is making record profits while millions struggle to pay their energy bills.

That is why this oilfield and all oilfields must not be allowed to go ahead, and we must speed up our just transition into renewable energy, one where the workers and people of this country benefit from.

R0024

I am concerned about Rosebank and urge you to not allow it to move forward. Nearly 250m tonnes of planet warming gas would be released from using oil products in the field. For the safety of our planet and its inhabitants please do not approve this project

[]

R0025

Dear Prime Minister,

[] are writing to urge your government to reject the application to develop the controversial Rosebank oil field.

The oil field would produce more **CO2** than the annual emissions of the 700 million people living in the world's poorest countries produce in a year.

Rosebank's vast emissions make it incompatible with UK climate commitments, as set out in Rosebank is a very bad deal for the UK – it **won't lower bills** and would do almost nothing to boost **energy security**; most of it is oil destined for export.

Rosebank could lead to a net tax loss of over £250 million to the UK Treasury thanks to the **enormous tax breaks** for new drilling in the UK.

Rosebank could see nearly a quarter of a billion pounds flow to a company that is contributing to human rights violations in the occupied **Palestinian** territory because of the joint development with Ithaca/Delek Group.

More **frequent, intense and unpredictable** episodes of heat, wildfires, flooding and drought are already affecting the world (including the UK). This government must not cave in to the pro-oil and gas agenda of politicians who doubt or deny the science of climate change and want to hold back our renewable energy industry and its thousands of jobs.

[] campaigns for the safe future of our grandchildren. We call on your government to do the same, and reject Rosebank.

Yours sincerely,

[]

R0026

I am a private investor who first invested in the North Sea nearly 50 years ago, I saw the UK become self sufficient with the obvious bonus for HMG's finances. The argument that Rosebank will add to global warming has no substance, if we do not extract & meet demand for O&G some other country will. For our own security, our national finances we should be extracting this asset whilst it still has value. For the foreseeable we need to be self sufficient & then taper away as nuclear, solar & wind takes the strain. But since industrial processes consume 25% of our oil we need this feedstuff indefinitely. Putin has demonstrated how he can affect the west & I am very aware that if he trawled

up the Norway gas pipeline we would be cold & have power cuts. By all means let Milliband continue his drive towards net zero but keep his hands off the O&G industry.

Regards,

[]

R0027

I am concerned about Rosebank and urge you to not allow it to move forward. Nearly 250m tonnes of planet warming gas would be released from using oil products in the field. For the safety of our planet and its inhabitants please do not approve this project

[]

R0028

I am concerned about Rosebank and urge you to not allow it to move forward. Nearly 250m tonnes of planet warming gas would be released from using oil products in the field. For the safety of our planet and its inhabitants please do not approve this project

[]

R0029

I am concerned about Rosebank and urge you to not allow it to move forward. Nearly 250m tonnes of planet warming gas would be released from using oil products in the field. For the safety of our planet and its inhabitants please do not approve this project

[]

R0030

Hello

I am concerned about Rosebank and urge you to not allow it to move forward. Nearly 250m tonnes of planet warming gas would be released from using oil products in the field. For the safety of our planet and its inhabitants please do not approve this project

[]

R0031

Dear Sir or Madam,

I am writing to register my objection to the proposed Rosebank Field Development (ES/2022/001), submitted by Equinor UK Ltd. I urge the Department for Energy Security and Net Zero to refuse consent for this project.

1. Climate and Environmental Responsibility

The Rosebank project would extract hundreds of millions of barrels of oil at a time when the UK must urgently reduce emissions to meet both domestic and international climate commitments. The Environmental Statement and supporting documents fail to adequately account for Scope 3 emissions—the carbon released when the extracted oil is ultimately burned. These emissions represent the vast majority of the project's climate impact and cannot be ignored.

Approving Rosebank would undermine the UK's legally binding target of net-zero greenhouse gas emissions by 2050 and contradict the scientific consensus that no new oil and gas fields can be developed if we are to limit global heating to 1.5 °C. It also sends a damaging signal internationally, suggesting that short-term corporate profit outweighs the collective survival interests of humanity.

2. Economic and Public Interest

Rosebank offers little to no financial benefit to the British public. Because of generous tax reliefs introduced by the UK Government—particularly the Investment Allowance within the Energy Profits Levy—Equinor and its partners can claim back up to 91 pence in tax relief for every pound they invest. In practice, this means UK taxpayers will subsidise a major oil company's profits while receiving minimal returns.

The oil produced from Rosebank will not reduce domestic fuel prices, as it will be sold on the open global market. Meanwhile, the same public funds could be directed toward renewable infrastructure, home insulation, and sustainable energy innovation—projects that create long-term employment and genuine energy security for UK citizens.

3. Fairness, Accountability, and Tax Obligations

Equinor and its partners have enjoyed extraordinary profits during the energy crisis, largely due to market volatility rather than innovation or productivity. Yet, they continue to benefit from a tax regime that allows vast deductions for fossil fuel expansion. This is morally indefensible when households across the UK face high energy bills, and public services remain underfunded.

A responsible government should prioritise public welfare and fiscal fairness, ensuring that corporations contribute proportionately to the society and environment they profit from—not reward them for expanding climate-damaging activities.

4. Long-Term Vision

Every decision made today shapes the world we leave to the next generation. The Rosebank project represents an outdated model of energy policy: one that favours extractive industries over sustainable progress. By rejecting Rosebank, the UK can demonstrate leadership, integrity, and a commitment to a liveable future.

For all the above reasons—environmental, economic, ethical, and strategic—I urge the Department to refuse consent for the Rosebank Field Development.

Thank you for considering this submission.

Yours faithfully,

[]

R0032

Dear Sir/Madam,

I have just one comment on Equinor's plan to release 254 million tonnes of carbon dioxide equivalent into the atmosphere via the Rosebank oil field.

Just, DON’T

Please STOP Rosebank

It was permitted in 2023 by the Sunak government but then had its permission quashed by the Scottish Court because there had been no assessment of the climate impacts of burning all the oil and gas to be produced. That hasn’t changed! To say nothing of the terrible impacts on the marine environment.

Regards

[]

R0033

Dear Secretary of State,

This email is my response to the Government consultation on the Rosebank oil field.

I wish to object to this project going ahead.

I believe governments all over the world, including in the UK are failing citizens by not taking the necessary action to tackle climate change.

The developers of the Rosebank oil field have said nearly 250 million tonnes of planet warming gas would be released from using oil products from the field. This alone should be sufficient reason for refusing permission for this project to go ahead.

We all know the 1.5 degree target for global temperatures will not be met and that we now face temperature rises of over 2 degrees with all the attendant disasters that this will lead to.

Under these circumstances surely the only responsible decision that the Secretary of State can make is to refuse permission for this project to go ahead.

Thank you for reading my response.

Kind regards

[]

[redacted]

R0034

[redacted] 5th November 2025

Dear Mr Miliband

We are writing on behalf of [redacted] about the recent submission by oil giant Equinor to develop Rosebank oilfield in the North Sea, and the Governments request for public consultation and response. This project would be a disaster. The Government has already rejected an application once, and we urge you to refuse again, and put an end to this enormously damaging proposal. Here are a few major reasons to reject the proposal:

1. Rosebank would add to the climate emergency by burning huge amounts of new fossil fuel. And it would massively damage the UKs climate goals. Scientists have warned repeatedly that we cannot afford to allow more new oil and gas if we want to limit global warming to 1.5 or 2 degrees above pre-industrial levels. Rosebank would produce more CO2 than the 28 poorest countries in the world do in a year, and it would cause more areas of the world to become uninhabitable.

2. Oil and gas from Rosebank would not lower our energy bills because prices are set on a global market. And it would not make our energy supply more secure, as 90% of the oil extracted would be exported overseas.

3. The UK public would be carrying almost all the costs of developing Rosebank, in the form of billions of pounds in tax breaks for the oil giant, Equinor, while the profits will go to Equinor, owned by Norway, not UK.

4. Rosebank will not halt the decline in jobs in the North Sea. This decline is already happening and the only way to reverse it is by supporting the Green Energy Strategy of the Dept for Energy and Net Zero, and the just transition to renewable energy.

5. Rosebank is right next to a marine protected area, and it will threaten endangered species.

   The Government has already refused the exploration of Rosebank. We urge it to refuse again this second request from Equinor.

   With best wishes

   Yours sincerely

   [redacted]

   [redacted]

[redacted]

R0035

I am concerned about Rosebank and urge you to not allow it to move forward. Nearly 250m tonnes of planet warming gas would be released from using oil products in the field. For the safety of our planet and its inhabitants please do not approve this project

[]

R0036

Dear sir or madam of the Offshore Petroleum Regulator for Environment and Decommissioning and the Secretary of State.

I am writing with regard to the application to develop the Rosebank oil field (ES/2022/001).

Scotland produces 3.5 times it’s energy needs from renewables, with much more in the pipeline. Nature needs a fossil fuel free future.

We are all part of nature and fully dependent on it.

To deny this is folly.

Do not approve Rosebank - this is a moral imperative.

Scottish people deserve the right to decide how to use their own resources.

[]

R0037

Reference: ES/2022/001

Hello, my name is []. I am writing to express my strong opposition to the Rosebank oil field.

Rosebank would completely contradict the UK's climate targets, surrender any global climate leadership we have left, and hurt the economy in the long-term by delaying the just Green transition we need.

Thank you very much,

[]

R0038

Hello,

I am concerned about Rosebank, and urge you to not allow it to move forward. Nearly 250m tonnes of planet-warming gas would be released from using oil products in the field. For the safety of our planet and its inhabitants, please do not approve this project.

Thank you,

[]

R0039

Hello,

I am concerned about Rosebank and urge you to not allow it to move forward. Nearly 250m tonnes of planet warming gas would be released from using oil products in the field. For the safety of our planet and its inhabitants please do not approve this project.

Best,

[]

R0040

Madam/Sir

I wish to register my strong opposition to the Rosebank Development as proposed by Equinor on the basis of the Scope 3 Emissions analysis, which outlines significant environmental damage.

1.6.4 For the Rosebank Development, the total gross GHG emissions over its lifetime are estimated to be 254 million tonnes of carbon dioxide equivalent (CO2eq).

These additional GHG emissions are unacceptable and totally unnecessary.

Please acknowledge my opposition to this development.

Kind regards

[]

R0041

My view is that the development of the Rosebank field should go ahead. As long as we have a chemical industry, an aerospace industry, a maritime industry and people and companies are permitted to drive petrol and diesel powered vehicles, there will be a continued demand for petroleum products. If we don't produce the oil we will have to increase our imports from other oil producing countries.

It must be better to produce locally something for which there is a continued demand with the beneficial impact on jobs and tax receipts.

Regards

[]

[redacted]

R0042

[redacted]

Email: [redacted]

Web: [redacted]

Rt Hon. Sir Keir Starmer MP
Prime Minister
10 Downing Street
SW1A 2AA

12th November 2025

Dear Prime Minister,

You will have already received a strong representation against allowing further oil and gas exploration and mining, in for example the Rosebank field, sent from [redacted] on behalf of [redacted]. [redacted] are senior citizens ([redacted]), who are trying to ensure that the world where future generations will grow up will be safe, healthy and just. That representation particularly – although not exclusively - is concerned with the impacts of Rosebank mining on Climate Change.

I now write further on behalf of the medically qualified members of [redacted] to highlight the acute Public Health crisis from air and water pollution, which will be further exacerbated by any continued dependence on internal combustion engines, as well as further use of fossil fuels in industry

[redacted]

I am sure that you would agree that it is an absolute duty of government to prioritise the health of the population over and above any short term interests of companies which may benefit financially from oil and gas mining.

I must assume also that you have been made fully aware of all of the following:

1. **Pollution significantly increases morbidity and mortality in children**, according to several reports from the Royal Colleges (Colleges of Physicians, Paediatrics and Child Health, and of Obstetrics and Gynaecology). Air pollution is now the second leading risk factor for death in children under five, globally and in the UK, with no safe exposure level identified for fine particulate matter ($PM_{2.5}$) and related toxic air components.

2. **Mortality Burden:**
    - The annual mortality burden attributed to outdoor air pollution in the UK is equivalent to approximately 40,000 deaths (adults and children combined), with a substantial proportion affecting children due to their vulnerability.
    - In specific studies focused on London, estimates from coroner reports and academic research indicated that between 3,600 and 4,100 deaths in 2019 could be attributable to anthropogenic fine particulate matter ($PM_{2.5}$) and nitrogen dioxide (NO_2), where health effects persist even at very low pollutant levels. I am sure that you will also be aware that the very welcome recent reductions in morbidity in the Greater London area can be attributed to the fortitude of the Mayor of London in withstanding the pernicious pressures and going ahead with ULEZ
    - Air pollution's effects are underreported in cause-of-death data, as environmental factors are rarely listed on death certificates, in spite of their known role in conditions such as lung and heart disease.
3. **Morbidity Levels and Health Impacts**
    - Research demonstrates that air pollution stunts children's lung growth—such as in Liverpool, where pollution from roads stunted lung growth by 4.6%

- Children exposed to high levels of diesel pollution have significantly reduced lung capacity, increased rates of asthma, chest infections, and risk of earlier death.
- Air pollution is linked to a wide range of health issues: increased rates of asthma, respiratory infections, cardiovascular disease, cancer, and neurodevelopmental conditions such as dementia. It has now been definitively demonstrated that the key pollutants can not only cross the Blood-Brain barrier, but can also cross the Placenta and damage the health of the Foetus.
- As a result, exposure starts affecting health from pre-birth and continues throughout life, with those living in areas of social and economic disadvantage facing significantly higher exposure and risks.

4. Inequalities and Risks

- Nearly one in three babies in the UK live in areas with unsafe levels of particulate matter
- Children from disadvantaged backgrounds are more likely to be exposed to dangerous pollutants. In London, schools with the highest percentage of non-white pupils experience substantially higher nitrogen oxide levels than those with lower proportions.
- There is no identified safe threshold for air pollution exposure, emphasizing every child's risk of increased morbidity and mortality
- Royal College reports, such as "Every breath we take" and new updates, continue to urge governments for stronger policy action to protect vulnerable children's health and to address the ongoing burden from air pollution exposure.

(All references available on request)

As senior doctors – most of whom are now retired from active NHS service or research - it seems to us quite inconceivable that with this knowledge any government could morally take a decision which either directly or indirectly fails to address this crisis, or even exacerbates it. It seems extraordinary that the one child's death (of Ella Adoo-Kissi-Debrah) should be the only successful litigation of local or national government to

[redacted]

date, given that all the children who died of asthma were found to have lived in locations with air pollution exceeding the WHO limits for particulate matter and nitrogen dioxide, both at home and school.

We trust that as Prime Minister you will provide a clear and unequivocal message that the health of the nation, and of its vulnerable children in particular, will take absolute precedence.

Sincerely,

[redacted]

[redacted]

[redacted]

[redacted]

R0043

Secretary of State for Energy Security and Net Zero

I would like to comment on the Rosebank oilfield environmental statement and consider that the impacts on the climate arising from the project are significant and unacceptable. If global temperature rises are not kept below 2C, the Rosebank project could significantly impact the climate due to its high sensitivity and cumulative effects. Notwithstanding the maintenance of global temperatures below 2C, the impacts remain significant and unacceptable.

Permission should therefore be refused.

Regards

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R0044

Dear Mr Miliband,

I am writing to you in regards to the public consultation for the Rosebank Field Development 'ES/2022/001'.

I completely disagree with this project and stand vehemently against it going ahead.

The new laws which required scope 3 emissions be published this time around reveal not only the manipulative dishonesty of Equinor in its first application but also just how significant the climate impact will be. The new figure of nearly 250million tonnes of carbon over the field's lifetime is "*more than 50 times greater than the original figure of 4.5 million tonnes it gave from extracting the oil and gas*" and in **Equinor's own report** they conclude that this will have a **high risk impact on climate...**

"Conclusion on Assessment of Significance

6.5.5 As set out in section 6.2, the Downstream Scope 3 Emissions associated with the Rosebank Development are assessed as having a likely impact on climate. The sensitivity of the climate receptor is considered to be "high" (section 6.3.3)."

We have seen deeply disturbing papers published recently on tipping points. The first discovering that the Arctic Meridional Overturning Circulation has a worrying likelihood of collapsing this century https://iopscience.iop.org/article/10.1088/1748-9326/adfa3b (this is significant to me as I am only 21 so this could be within my lifetime and definitely my childrens') The second showing we have already crossed the tipping point for coral

reefs https://www.sciencedirect.com/science/article/abs/pii/S0262407925016926. We are only at 1.5 degrees of warming and the climate system is collapsing.

The uncertainty in climate models seen earlier this century is being corrected now, and the most recent research shows we have badly **underestimated** the severity of warming and the sensitivity of tipping points and that we need an **even more rapid decarbonisation** approach so as to avoid catastrophic **socioeconomic fallout**.

And regarding Equinor's empty promises on decarbonisation, Client Earth has found that "*Equinor has not reduced its annual Scope 3 emissions. In fact, they have slightly increased* [1] *since 2015, to 247 million tonnes CO2 equivalent in 2019 and 250 million tonnes CO2 equivalent in 2020*" and continue to do so annually.

This country's infrastructure, food security, border security, healthcare etc **cannot** survive significant climate disruption. Please **do not approve** the Rosebank Field; it is economic and societal suicide to do so.

I hope you take my opinion into serious consideration as part of this consultation.

Kind Regards,

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[1] google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjSm-Sk8b2TAxV4V0EAHTVMIlMQFnoECB0QAQ&url=https%3A%2F%2Fwww.equinor.com%2Fcontent%2Fdam%2Fstatoil%2Fdocuments%2Fsustainability-reports%2F2020%2Fequinor-sustainability-report-2020-LR.pdf&usg=AOvVaw2NGPoVR9sSAqZ6ZRjDQt5j&opi=89978449

R0045

Hello,

I'd like to formally express my opposition to the proposed reauthorisation of the Rosebank gas field, which as stated by the Scottish courts was an unlawful decision due to the lack of consideration in regards to emissions generated from burning the gas field.

To go ahead with this proposal would in my view be totally contrary to the goals of the Climate Change Act and the commitments of the UK to reach net zero.

Instead of focusing on oil and gas, the UK should instead be focusing on scaling up nuclear power and developing small modular reactor plants at scale, this in my view is a vital tool that will enable the UK to transition away from fossil fuels.

To create more emissions while the world's poorest in the Global South and elsewhere, countries like Nauru which are experiencing the total loss of their country as a whole is morally unconscionable. The UK needs to take its place as a leader on this issue, to offer an alternative in comparison to countries like China, Russia and India which seem committed to continue to produce large amounts of CO2 emissions with little concern for the environment or the future of our planet.

I am also concerned about the impacts on fisheries, as there is an important population of haddock in the area that is planned for this gas field. The UK government needs to consider as having recently announced a financial package to support the fisheries industry, is this really what we need at this time?

It's a simple fact that if we are to meet our net zero commitments by 2050, there simply can't be any new oil and gas developments going ahead, this would make reaching that goal an unattainable dream rather than a reality, which is something we simply can't afford to let happen, on a moral level, socioeconomic basis as well as in terms of our nations health, with an increased amount of extreme weather events such as heatwaves which will clearly put even further strain on the NHS due to the impact on our vulnerable populations, such as the elderly.

Kind regards,

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R0046

Dear Secretary of State

I have no doubt that you have received many representations on whether the Rosebank Oilfield development should be allowed to go ahead and doubtless the majority are from either vested interests who would benefit directly from the development, or from those implacably opposed to any (let alone, further) extraction of oil or gas around the UK.

I am in neither of those camps but I do have considerable relevant expertise, including an MA in Environmental and Social Policy and extensive experience in economic and security policy.

Although I have serious reservations about continued extraction of hydrocarbons, there is a clear national interest in allowing the Rosebank Development to progress. There are multiple reasons for this, for which I will give a very brief summation of my reasons.

1. As the latest IEA World Energy Outlook predicts, the demand for oil and gas will continue to rise. This is absolutely not desirable but it is the world in which we live. There may be a case for 'UK moral leadership' but that argument has two massive flaws.

First, being brutally honest, on a global scale no one that matters with regard to changing relevant global behaviour really cares and, even more, I suggest recent history shows they will be more than happy to exploit any weakness it gives us (as per rare earth metals from China, or Trump happily filling US coffers selling us oil and gas). Second, the moral argument is not far short of hypocrisy if not fully hypocritical. There is no credible short or medium term UK Net Zero policy in which our reliance on oil and gas disappears. If that need is not met from UK sources then it will be met by bringing it (at significant environmental cost - even without allowing for less robust environment or employment standards at the point of extraction) from some of the most toxic regimes on the planet.

2. Many opponents have drawn attention to the global nature of the relevant markets and that what is extracted will be sold on those markets, rather than directly benefiting UK residents through reduced prices. This is a fallacious misrepresentation of how UK derives benefit from extraction of oil and gas. The correct question is more along the lines of 'would UK consumers rather buy oil and gas from abroad and in doing so, transfer wealth from UK to those regimes, or would UK consumers rather buy from a company that is works to UK environmental and employment standards, pays tax on that activity to improve the UK fiscal position, increases the ability to spend on public services, improves the UK balance of payments, and strengthens the currency?' It shouldn't really be a difficult question to answer. The role of the government is to ensure those benefits accrue and although the terms of the Rosebank development are not as good as they should be (perhaps part of approval is to make it conditional on strengthening the UK benefit in the agreement), those benefits are there. Of course the transaction is not quite that simple but the net transaction is.

3. The single most important reason to proceed with Rosebank is UK security in a global context. We have, courtesy perhaps of Trump, seen an increase in economic 'muscle-flexing' to exploit vulnerability. Courtesy of Putin, we have been reminded of how fragile global security really is. It is a global environment in which national 'ownership' (as in, guaranteed access in time of emergency) is now more important than any time since WW2. Whilst there is considerable merit in the argument that diversified UK-based renewable energy improves our security, it has limits. Our industry and economy relies on oil and gas and our armed forces will require fuel for the foreseeable future. It is a simple matter that our national security is greatly enhanced by guaranteed access to oil and gas. It would be an abrogation of the most basic requirement of government, the provision of collective security, to not act to continue and enhance that energy security.

As I explained to my MP, the climate emergency only matters if we can survive long enough for it to be a problem. Of course we must strive to that long-term goal of net-zero and, better still, no extraction of hydrocarbons. However, reducing our energy and

raw material security makes us more vulnerable and conflict more likely, so we have to get that bit right as the priority.

In sum, I urge you to approve the Rosebank development for both the economic and security benefits it offers the UK. If there is scope to improve the benefit that accrues to UK, take it, and in no way need the decision imply any reduction in the UK's commitment to tackling climate change; it is, rather, the correct act for responsible government.

Regards

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R0047

The oil giant Equinor has submitted a new application for Rosebank, even though last January the Scottish courts ruled its development unlawful. Emissions from the burning of the oil extracted from it – roughly 250 million tonnes of carbon dioxide during the lifetime of the project – would undermine the UK's legal commitments to reduce carbon levels to a safe limit to prevent catastrophic climate change.

No benefit to UK households

Incredibly, the deal that Equinor brokered with the last Conservative government was for UK taxpayers to bear almost all the costs of developing Rosebank, handing the company £ billions in tax breaks and enabling it to make record-breaking profits. Yet UK households would see no benefits in the form of reduced energy bills or increased job opportunities.

As if this wasn't bad enough, I understand that the majority shareholder in Equinor's parent company Ithaca, the Delek Group, facilitates and profits from the construction and growth of illegal Israeli settlements in Palestine's West Bank.

Next to a marine protected area

I am also shocked to learn that Rosebank is right next to a marine protected area. Its development would likely harm dolphins, whales and fish. They rely on sound to communicate with each other, find food and navigate.

Very intense and sharp sounds caused by drilling, seismic blasting and construction could damage their hearing, seriously disorient them, and cause death through starvation or beaching.

Fish may leave their feeding grounds, adversely affecting the fishing industry. [1]

Catastrophic consequences of a major oil spill

Furthermore, a major oil spill could have catastrophic consequences for wildlife in the North Sea. Rosebank's pipeline would cross a specially protected seabed, threatening its precious coral gardens, deep-sea sponges and clams.

I call upon the Government NOT to waste taxpayers' money on unlawful and harmful oil projects that could be redundant before they are constructed, but instead commit to enabling the UK to become a world leader in renewable energy, creating many more job opportunities and boosting our economy.

This development just shouldn't be allowed as the risks are too great.

Best Wishes

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[1] https://theconversation.com/whales-stop-singing-and-rock-lobsters-lose-their-balance-how-seismic-surveys-can-harm-marine-life-211207

R0048

Dear OPRED Team,

As a [] climate activist and conservationist from [], I am alarmed that approving the Rosebank oil field (ES/2022/001) would irreversibly damage the climate, our oceans, and the future of my generation. Decisions made now will have lasting consequences, and I urge you to carefully consider the climate, ecological, and societal implications before granting consent.

I submit this representation in accordance with the **public consultation process under the 2020 EIA Regulations**, and I have reviewed the Environmental Statement and further information provided by Equinor. While these documents offer some context, they fail to fully address the global impact of scope 'a03 emissions, the ecological risks to Marine Protected Areas, and the societal implications for current and future generations. With first drilling planned in **Q1 2026**, timely action is critical to prevent irreversible environmental harm.

Key Concerns:

- **Scope 3 emissions ignored:** The proposal fails to adequately account for downstream emissions from the oil's combustion, which could exceed **200 million tonnes of CO2**. Approving this project contradicts the UK's climate commitments and the International Energy Agency's guidance that no new oil and gas fields should be developed if we are to limit warming to 1.5°C.

- **Threat to Marine Protected Areas:** The pipeline would impact the **Faroe-Shetland Sponge Belt MPA**, an ecologically sensitive area home to deep-sea sponges, coral gardens, and long-lived marine species. Even minor incidents could have **catastrophic consequences** for these ecosystems.
- **Economic inequity and public risk:** The majority of benefits flow to Equinor and Ithaca Energy, while the UK public bears the **financial and environmental risk**. Much of the oil is likely to be exported, undermining claims of domestic energy security or economic benefit.
- **Contradiction with Net Zero 2050 and global climate goals:** Authorising new fossil fuel extraction locks the UK into further emissions, undermining renewable investment and transition pathways.
- **Youth and climate justice:** My generation faces the brunt of climate change. Developing new oil fields now is incompatible with the responsibility to safeguard our future and global climate equity.

Additional Considerations:

- **Stranded asset risk and opportunity cost:** Global fossil fuel demand may peak within the next decade, making Rosebank a high-risk investment. Public funds and political capital would be better directed to renewable energy and marine conservation, providing sustainable economic and environmental benefits.
- **Cumulative ecological impacts:** Offshore drilling, shipping, and potential spills add up to **significant long-term risks** for marine ecosystems.
- **Public trust and governance:** Legal findings of unlawfulness and lack of transparency undermine confidence in regulatory oversight and the government's climate credibility.
- **Health and socio-economic impacts:** Potential pollution, accidents, and disruptions to fisheries and coastal communities further exacerbate public risk.

Growing up [], I see firsthand how climate change affects our communities and ecosystems. Approving this project would lock in emissions, threaten biodiversity, and put my generation at an unfair disadvantage.

Call to Action:

In light of these concerns, I respectfully **request that consent for ES/2022/001 be denied**, keeping the Rosebank oil field undeveloped. I also **request a formal acknowledgment or response** to this submission to ensure that public input is properly considered in your decision-making process.

Thank you for your attention to this urgent matter.

Le meas \\ Kind regards,

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R0049

Dear OPRED,

I am writing to express my strong opposition to the proposed Rosebank oilfield development and to urge the government to reject this project in favour of investing in decarbonisation and renewable energy infrastructure.

The Rosebank oil field represents a fundamental contradiction to the UK's climate commitments and net zero targets. The climate pollution from burning Rosebank's reserves would exceed the combined annual CO2 emissions of all 28 lowest-income countries in the world. At a time when the International Energy Agency has made clear that no new oil and gas exploration should take place if we are to limit global heating to 1.5°C, approving Rosebank would send entirely the wrong signal about the UK's climate leadership.

Rather than investing in new fossil fuel extraction, the government should be directing resources toward:

Clean energy infrastructure: Building out renewable energy capacity to provide genuine energy security while creating sustainable jobs.

Energy efficiency: reduce energy demand, lower bills for consumers, and create employment in the green economy.

Green skills and just transition: Supporting North Sea workers to transition into renewable energy sectors with retraining programmes and investment in new industries.

Climate resilience: Protecting communities from the increasing impacts of climate change that are already causing significant damage and costs across the UK.

The economic case for Rosebank is weak. The vast majority of oil and gas extracted would be sold on the international market to the highest bidder, providing no meaningful benefit to UK energy security or consumer energy costs. Meanwhile, investment in renewable energy would deliver genuine energy independence, stable prices, and long-term economic benefits.

The transition to clean energy represents an enormous economic opportunity. By choosing to invest in decarbonisation rather than new fossil fuel projects, the UK can position itself as a leader in the global green economy, attracting investment and creating sustainable industries for decades to come.

The choice before the government is clear: continue down a path of fossil fuel extraction that undermines our climate commitments and offers little genuine benefit to British

people, or seize the opportunity to invest in the clean, secure, affordable energy future that the country needs.

I urge you to reject the Rosebank development and instead commit to a comprehensive programme of investment in decarbonisation, renewable energy, and a fair transition for workers.

Yours sincerely,

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R0050

To Whom it may concern,

I am writing concerning the Rosebank Oilfield consultation, to express my alarm that the opening of this oilfield is again being considered.

Climate scientists say that there are already enough reserves available in currently working fossil fuels projects, to render our environment unliveable.

The oil produced from Rosebank will be sold on the global market and will do nothing to improve our energy security. Additionally generous tax breaks mean that most of the cost of the project will be paid for by UK taxpayers, and the profits will go to a foreign owned firm.

I don’t understand why the government would put so much money into this project when renewable energy provides better, cheaper energy security and future jobs.

I therefore want to strongly express my disapproval of this project on environmental and economic grounds.

Kind regards,

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R0051

Dear Secretary of State,

Re. Rosebank proposed development - consultation ES/2022/001

Thank you for allowing a public consultation on the issue of the Rosebank oilfield development. I write from the perspective of a highly concerned scientist. The answer is crystal clear: the planet is burning, and the oil and gas needs to stay in the ground (at

least, until such time as we stop burning it). Allowing this development would do nothing to reduce energy prices in the UK or to help with our energy security. We need to speed up the transition to green energy. Please do not be swayed by the short-sighted profit-seeking arguments of the fossil-fuel lobbyists: reject the application for further development of Rosebank.

Regards

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R0052

Good morning,

I would like to provide a comment in relation to the Rosebank Field Development as part of this period of Public Consultation.

As an environmental scientist, there is no possibility to view this development favourably and I am of the strong opinion that this development must not be approved.

It is detailed that the development would produce 254 million tonnes of carbon dioxide equivalent which Equinor claims is 'not significant'. This attempt at covering up the massive contribution this will make to the UK's pollution levels is unacceptable and the research as shown that it is, and has been, clear for many years that our legally-binding climate commitments cannot be met if there is any more extraction and subsequent burning of fossil fuel reserves.

The funding associated with this development must instead be redirected towards large-scale development of renewables.

Regards,

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R0053

My view, as a Chartered Environmentalist, is that we cannot afford to extract more ancient carbon from secure deep storage and release it into the atmosphere. Release will risk extreme detrimental effects on great parts of the world, both human and other organisms.

No new extraction can be regarded as insignificant as they all act collectively.

Immediate profit must not be at the expense of subsequent generations.

Your faithfully

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R0054

Dear Mr Miliband

Developing Rosebank in incompatible with the UK's legal requirements to reduce carbon emissions, and will not lead to increased energy security. Instead, it will exacerbate our already perilous state, and increase the risk we are facing from climate change.

We are already seeing risks to food supply and to health in this country, and climate change is a major cause of global instability, forcing people to leave their homes and seek refuge here. If you want to tackle immigration, inequalities and health, work on carbon reduction

Don't play into the hands of the oil industry. Developing Rosebank can only lead to more bad news - not what this government needs right now.

Yours sincerely,

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R0055

Dear Business Support Team,

I am writing as an informed expert to express my emphatic opposition to the development of the Rosebank oil field. Amid the climate breakdown that is already affecting the UK and all other countries, it would be catastrophic to begin development on this large reserve, which would lead to significant emissions of CO2 at a time when the global priority must be to cut emissions urgently and dramatically. As discussions falter in Belem at COP30, the UK has an opportunity and a responsibility to do all it can to push these desperately needed emissions cuts here and around the world. We are saying the right things in the discussions at COP30, but we must accompany these statements with bold action, and show the leadership that the world needs to see. Developing Rosebank would show a blatant disregard for these efforts, for our responsibility to act to mitigate and adapt to climate change, and ultimately for securing a safe and stable future for our generation and all of those who follow us.

Accelerating efforts to cut emissions of greenhouse gases to net zero by 2050 is a fundamental imperative. Developing Rosebank would go directly against this imperative and make a mockery of the UK's leadership in climate action so far.

I am available for further discussion on this important matter, should you wish to follow up by reply.

Best wishes,

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R0056

To: Business Support Team, Offshore Petroleum Regulator for Environment & Decommissioning, Department for Energy Security & Net Zero

Reference: ES/2022/001

Dear Business Support Team,

I am writing as marine conservationist and concerned citizen to express my firm opposition to the development of the Rosebank oil field. At a time of global climate breakdown, to which the UK is already vulnerable and exposed, approval of this major fossil-fuel development would be deeply irresponsible. I urge you to refuse consent.

Below I present the key reasons under economic, social, and environmental dimensions.

Environmental Arguments

1. **Massive greenhouse-gas emissions:** According to the project's own documentation, the downstream (Scope 3) emissions from combusting the oil and gas produced by Rosebank are estimated at approximately **254 million tonnes CO_2-equivalent** over the field lifetime.

    o At a time when the UK has committed to reaching net zero by 2050, and when major independent studies show that no new oil and gas fields are compatible with limiting warming to 1.5 °C, opening a new field of this scale is irreconcilable with credible climate policy.

    o The UK's legal and regulatory regime has already found **the prior consent for Rosebank unlawful because it did not properly assess these downstream emissions**.

2. **Lock-in of fossil infrastructure:** Approving Rosebank would set a precedent of further deep-water fossil-fuel investment, diverting capital, labour and innovation from true net-zero-aligned technology and locking the UK and its communities into a high-carbon path.

3. **Marine and ecological risk:** The field is located approximately 130 km north-west of Shetland in deep water (~1,100 m) in the Faroe-Shetland Channel. Deep-sea ecosystems are still poorly understood; potential for drilling/spill impacts, risk to marine protected areas (including cross border effects) and uncertainty in mitigation must weigh strongly against approval.

4. **Inadequacy of mitigation claims:** The developer (Equinor UK Ltd) asserts that upstream emissions per barrel are relatively low and that electrification of the floating production storage and offloading (FPSO) vessel may reduce emissions to <3 kg CO_2 per barrel.

    o But even if such upstream gains are realised, they do not change the fact of the **massive downstream combustion emissions**.

    o Further, the company itself states that "since the use (including whether or not this is by combustion) of the production is not within the control of the Rosebank Development, no mitigation measures that could be taken by the Rosebank Development have been identified" for Scope 3.

o In short, the mitigation plan does not credibly address the central climate impact of the field.

Given these points, approval of Rosebank would send a retrograde signal: that the UK is willing to open major new fossil fields despite the climate science, legal precedent, and its own net-zero commitments.

Economic Arguments

1. **Questionable alignment with UK energy security/value**: The developer (Equinor) projects peak gross value-added (GVA) of ~£2 billion annually and lifetime UK-based investment of ~£6.6 billion, with £25 billion total lifetime GVA (direct, indirect, induced) purported.

    o However, many of these economic benefits may be overstated and/or short-lived, while the long-term risks of stranded assets, regulatory reversal, and changing energy markets are very real.

    o Crucially, as highlighted by campaigners, most of the oil produced is likely to be exported rather than used in the UK, meaning the claimed "energy security" benefit is weak.

2. **Opportunity cost and stranded-asset risk:** Approving Rosebank ties up infrastructure, supply chain investment and skilled labour in fossil-fuel extraction rather than in renewables, energy efficiency, and the new jobs growth sectors. If climate policy tightens (as it must to meet targets), the field may become uneconomic or unviable, once again, leaving UK taxpayers or communities bearing the cost.

3. **Employment & transition risks:** While the development promises over 2,000 jobs at peak, the reality in the UK and North Sea basin is that fossil-fuel employment has been declining and future job-growth is overwhelmingly in clean energy. Supporting Rosebank could inhibit the just transition to a sustainable workforce.

Social & Equity Arguments

1. **Intergenerational justice:** Approving a large new fossil project now burdens future generations with climate risk, stranded infrastructure, and decayed value. It is inequitable to lock them into high-carbon legacy rather than invest in durable, low-carbon infrastructure. We are borrowing from nature's bank but the interest rate has become untenable. The longer we hold out the greater the price we pay; nature does not negotiate.

2. **Local communities & global justice:** The UK has committed to climate leadership and to aligning its policies with the global south and vulnerable states. Approving Rosebank undercuts that leadership. Further, communities in small, less developed countries are already bearing the brunt of climate breakdown driven by fossil-fuel consumption globally. This UK decision compounds that injustice.

3. **Credibility & trust:** The UK invokes strong climate credentials. But going ahead with a major new oilfield undermines trust in its commitments and weakens its leverage in global forums (including COP processes). It sends the message that "net zero by 2050" is flexible if economic interests so demand, thus weakening broader climate action.

Summary & Recommendation

For all these reasons: the enormous climate risk, the questionable economic benefit, and the social justice implications, I urge you to **refuse consent** for the Rosebank field development. Approving it would be inconsistent with the UK's legal obligations, climate commitments, and broader strategic interest in a just, sustainable energy future.

Yours sincerely,

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R0057

Regarding public consultation ES/2022/001 on the Rosebank field development:

I am writing to express my profound opposition to the Rosebank field development. I write in my capacity as a concerned citizen of the UK, a parent, and as a public health doctor (GMC number []).

The science from the IPCC is clear: unless we drastically limit and reverse greenhouse gas emissions, we are facing a climate crisis of existential proportions. The extent of global heating currently predicted will cause untold human misery and suffering with the greatest burden falling on those who are already disadvantaged and who have least benefitted from fossil fuel use. Moreover, to fail to act on the knowledge we have about how to avert this scenario is the utmost betrayal of future generations.

Again, the science is clear: we must stop new oil and gas extraction if we are to have a hope of meeting emissions targets and therefore preserve a climate which is sufficiently stable for human flourishing. The updated impact assessment makes it clear that the proposed development of the Rosebank field is not compatible with these targets and therefore with a safe and liveable future for humanity. It must not go ahead.

The proposed benefits do not by any means justify the act of harm to human health and wellbeing that new oil and gas exploration in the North Sea would represent. It will not increase energy security for the UK given that its yield will be sold on the international market. It will not support a just transition for the North Sea jobs market, which instead needs support to navigate the already-ongoing decline in oil and gas and the rise of renewable energy and other sectors.

As a public health doctor, the health impacts of our ongoing climate and ecological crisis are my greatest concern among the many risks to human health and wellbeing that we currently face, both in the UK and globally. As a parent, it is my greatest fear and sadness for my young daughter, that she is growing up in a world where the planetary support systems on which human life depends - as well as its inherent natural richness and variety - are being destroyed, and that her world will as a result be more dangerous, more unequal, and less beautiful.

This is a moral crisis as much as it is a health and ecological one. The UK must show leadership by listening to climate science to preserve the chances of a liveable future, and refuse the Rosebank field development.

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R0058

This email is in reference to the UK Government consultation of Rosebank, ref: ES/2022/001

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The science is clear, but it seems to be getting more complicated politically to follow what it is telling us. The UK Government needs to stand firm on its frequently stated commitment to move the UK urgently and decisively away from a dependence on fossil fuels, to become a real leader in the efficient generation and use of renewable energy, to stimulate economic revival. Too many fine words have been said, without being backed up by action. Too often, it seems, lobbying by corporate interests has deflected the UK Government from taking bold but necessary action.

In the case of solar generation, it is being left to opportunistic business interests to open up our rural landscapes to industrialisation, at the expense of food security and quality of life. The Government has shied away from requiring all new homes and infrastructure to incorporate high levels of solar generation and energy efficiency, while providing incentives for retrofitting existing homes, warehouses, car parks etc.

The proposed development of a new oilfield at Rosebank would clearly be contrary to a commitment to move away from dependence on fossil fuels. It would tie us into oil and gas production for decades to come. Using the outputs of oil and gas would lead to massive additional carbon emissions, and a further hastening of global heating, as the developers have been forced to accept. It would cost the UK exchequer billions in tax handouts, to benefit foreign-owned oil companies, one of which is complicit in the Israeli system of repression of the Palestinians.

The UK Government should instead direct its resources to stimulate and nurture new technologies to ensure the just transition to a green economy, and to train the workforce in the skills which this will require.

Now, as COP30 approaches its conclusion, is a critical practical and symbolic moment for the UK to demonstrate that it means business - green, sustainable business, and a real break from the dirty industries that are plaguing out planet and jeopardising the future for our children and grandchildren, and the living planet.

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R0059

I am horrified that the government is considering giving permission for development of new oil and gas extraction at Rosebank. It has been unambiguously demonstrated, through robust scientific measurement and analysis, that the combustion of fossil fuels is the main driver of current global warming, and this has been acknowledged by DESNZ. The argument that the quantities of greenhouse gases released would be small in a global context is entirely misconceived: all emissions contribute to the

accumulation in the atmosphere. And giving such permission would take away from the UK its global leadership position in acting on climate change.

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R0060

I strongly object to the renewal of the Rosebank development project.

The environmental impact of this project being allowed will be catastrophic for the planet, future generations and the Labour Party.

1). The project is incompatible with the UK's climate targets.

2). It would become a stranded asset as the future of energy production is with green sustainable projects.

3). There would be significant environmental risks beyond Carbon - i.e. the risk of oil spills and the negative effect on marine ecosystems.

4). Overseas green sustainable companies would not wish to invest in the U.K. This would be extremely bad for the UK's economy.

The Labour Party will lose a huge number of supporters if this damaging project is given the green light. Many voters would move to the Green Party and the chance of keeping global warming to a liveable future will be harmed irreconcilably.

Signed ...[]

R0061

Dear Secretary of State,

I am writing as the DESNZ lead for the Green Group of MPs to respond to the public notice issued on 13th October 2025 with regard to the Rosebank Field Development.

I wish to object to the proposed project on environmental grounds as follows:

1. Burning the fossil fuels to which we already have access will result in breaching the 1.5 degrees of warming limit in the Paris Agreement. And as eg this June 2025 study from UCL found: "Any new oil and gas fields would further exacerbate that excess" (ref [1]). Allowing the extraction of new fossil fuels at Rosebank or any other field would therefore not be consistent with the Government's stated commitment "to take a globally standard-setting, 1.5°C and climate science-aligned approach to future oil and gas production". (ref [2])

2. Equinor has not taken a robust, cumulative approach to assessing Scope 3 emissions. For example, they do not accurately account for current and future production from existing or in-development fossil fuel projects. So they compare the production volumes from one field (Rosebank) with the total global production and find that this project produces significantly less than the total oil and gas demand. This contradicts the guidance, when it makes a similar point about comparing the emissions of one project to global emissions: "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" (ref [3]). A more accurate approach would the that used in the Production Gap report - where global existing production is overlaid against model demand and the project of interest is added on top (ref [4]).

3. Equinor includes models in its response that are not aligned with the 1.5 °C limit (ref [5]).

4. Equinor compares production volumes with demand, rather than comparing production emissions to global emissions in a cumulative manner: while oil and gas production is roughly proportional to emissions, this assessment is intended to evaluate the significance of scope three emissions. Whilst it's correct under the OPRED guidance to assume all production will be combusted, it is important to set the precedent now that emissions should be the basis for significance assessments.

On this basis, we urge you refuse to agree to the OGA's grant of consent for development of the Rosebank oil and gas field, including the drilling of the production and water injection wells, the installation and commissioning of the required subsea infrastructure and gas export pipeline, and the redeployment of an existing Floating Production Storage and Offloading vessel (FPSO) for the extraction and processing of hydrocarbons from the Rosebank field.

Yours sincerely,

Carla

Carla Denyer MP (she/her)

Green Member of Parliament for Bristol Central

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[3] https://assets.publishing.service.gov.uk/media/6853fa3d1203c00468ba2b15/Supplementary_guidance_-_Effects_of_Scope_3_Emissions.pdf

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R0062

18 November 2025

Dear Business Support Team, OPRED,

This is my response to the public consultation on whether permission should be granted to explore for and extract oil from the Rosebank field in the Faroe-Shetland channel. I note that the Scottish Court of Session ruled that the 2023 approval of this oil field could not go ahead as it did not account for the Scope 3 emissions that would result from the burning of the field's oil. I understand that the public consultation closes on 20 November 2025.

In my opinion, that ruling was absolutely correct and the Secretary of State for Energy Security and Net Zero should concur. The reasons for my opinion are as follows:

1. The effects of climate change are becoming evident and the world is perilously close to several irreversible tipping points. As I write this, the nearby town of Monmouth is underwater, just the latest example of catastrophic flooding in the UK.

2. The Secretary of State will be aware that the Climate Change Committee, the IEA, and the UN have all advised that there should be no new oil or gas exploration. To ignore the scientific advice from these authorities and proceed with oil exploration would be scientifically indefensible.

3. We will all have to answer to our children's generation for the state of the world that we are leaving them. Given what we now know about the science of climate change and CO2 emissions it would be morally indefensible to extract oil from this field.

4. Finally. oil extraction from the Rosebank oil field does not even make economic sense. I recall the previous Prime Minister, Rishi Sunak, claiming that extracting oil from this field would ensure the UK's energy security. I understand that 90% of oil extracted

will be sold on the open market to the highest bidder so this statement was quite simply wrong.

For all these reasons, I strongly urge the Secretary of State NOT to agree to any grant of consent by the Oil and Gas Authority to oil exploration and extraction from the Rosebank oil field.

Yours sincerely

[]

R0063

UK Health Alliance on Climate Change

The Prime Minister, Sir Keir Starmer
10 Downing Street, London SW1A 2AA

Secretary of State for Energy Security and Net Zero
Department of Energy Security and Net Zero
3-8 Whitehall Place, London SW1A 2EG

19 November 2025

Dear Sir Keir Starmer and Rt Hon Ed Milliband,

We write to you as health leaders deeply concerned about the threat which climate change poses to human health and survival both here and abroad, and the urgent need for global leadership at this critical time.

For these reasons, **we call upon you to reject development of the Rosebank oil and gas field, and to demonstrate global leadership in taking meaningful action to phase out fossil fuel dependency.**

The World Health Organization (WHO) has declared climate change to be a major threat to global health.[1] Harm is caused directly (e.g. from extreme weather events, heat illness, spread of infectious diseases, and starvation). Pollutants produced from fossil fuel combustion also contribute to causing disease ranging from respiratory disease and reproductive disease, diabetes to dementia, cancer to coronary disease, and more.[2]

Climate change impacts the socioeconomic factors upon which we all depend for our wealth, health and survival. **Without adequate action, we face collapse of our ecosystems and economy, and mass migration.**

Climate change is already driving food insecurity and food price inflation in the UK.[3] Between 2022-23 climate impacts on both home grown and imported food supply resulted in an average increase of £360 to every UK household's food bills.[4] UK arable farmers lost over £1bn to extreme weather events in 2024 alone [5], and the food industry warned that 'predictability of [food] supply … is not something we will be able to rely upon over the coming years'.[6]

Dependency on oil and gas carries mounting economic costs. The average cost to the UK economy from heat-related deaths in those over 65 has increased by 58% since 2000-2004 to £33bn between 2020-2024, and is set to rise further with global heating.[7] Labour productivity is also at risk - 5 million hours were lost to heat exposure in 2024.[7] The UK's fossil fuel dependency also makes local communities vulnerable to highly fluctuating energy prices. At a global scale, economic collapse will accelerate that of society. Insurance actuaries warn that we may soon face the loss of 50% of Global Domestic Product [8] and that 'our economy may not exist at all' without immediate action.[9]

Climate change is already driving mass migration. Globally, people displaced by disasters, such as storms and floods, broke a record high in 2024 with 45.8 million people displaced across 163 countries. Climate change fuelled migration poses a growing threat to food security.[10] The UN warns that starvation, disease and economic collapse bring migration ‘of entire populations on a biblical scale’ and war [11]. The 2024 Climate Report says we are ‘on the brink of an irreversible climate disaster’ and ‘much of the very fabric of life on Earth imperiled’.[12] And the Intergovernmental Panel on Climate Change has warned that without immediate intervention, we will miss ‘a rapidly closing window to secure a liveable future’.[13]

Granting access to exploit the Rosebank Field would fly in the face of the Government’s ambition to shift our health service from sickness to prevention, to save our NHS budget, to drive growth in the green economy, and to address climate change at pace and scale. It would be an abandonment of UK climate commitments.[14] If allowed to go ahead, the oil and gas field would produce more CO_2 than the annual emissions of the 700 million people living in the world’s poorest countries in a year and could lead to a net tax loss of over £250 million to the UK Treasury.[15] It won’t lower bills or provide long term energy security.

We were encouraged by your speech at the United Nations COP30 Summit where you highlighted the UK’s leadership in tackling the climate crisis and making Britain a clean energy superpower saying, “Our aim is simple: To make energy a source not of vulnerability, but of strength. An engine to create thousands of new jobs, bring down household bills, and end once and for all our exposure to volatile fossil fuel markets.” [16]

The health of UK citizens depends upon a strong economy fuelled by clean energy, upon diplomatic (energy) independence, and upon climate security. The decision on the Rosebank oilfield is a defining moment for the credibility of your Government to deliver on its laudable ambition to be a clean energy superpower and an NHS Fit for the Future.

As you said at COP30, you don’t protect jobs and communities by standing still. You do it by embracing change. We urge you to rise to this moment and do the right thing.

With regards,

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R0064

Dear Ed Miliband,

I'm writing to ask you to turn down the reapplication from Equinor to open the Rosebank oil field. Before the Labour party became the government , Starmer said there would be no new oil fields opened when they came into power. So to allow the oil to be extracted and burnt would be going against this pledge. I understand that the Rosebank oil field is huge and to allow all that oil to be burnt would be catastrophic for the future of life on earth. What's more I understand that the new oil would not be used by us in the UK and so it would not bring down our bills. We need to expand our sources of renewable energy instead!

I hope you will decide to honour the pledge made by Starmer before he became prime minister, not to open any new oil fields. For the sake of life on earth please do this!

Best wishes,

[]

Imperial College London

[redacted]
Imperial College London
[redacted]

19 November 2025

On the proposed development of the Rosebank Oil and Gas Field:

This submission is focussed on the additional UK emissions due to the proposed Rosebank oilfield.

Highly impactful extreme weather events are increasing globally. Using several lines of evidence, including observational data and climate models, scientists can find:

1. The change in likelihood of an event at least as extreme as observed.
2. The difference in intensity of an event as rare as the one observed today with an event of equivalent rarity in a world without climate change.

This work has shown across 100s of studies globally, that the likelihood and intensity of extreme weather events has strongly increased in response to climate change, caused by the burning of fossil fuels: oil, coal and gas. In the UK, Storm Desmond – which caused widespread damage across the northern British Isles in 2015 – was found to be 60% more likely due to human caused climate change (Otto et al., 2017). The extreme summer heat of 2022 – which caused over 2000 excess deaths (UKHSA, 2025) and extreme wildfire outbreaks (Burton et al., 2025) – was found to have been statistically impossible without climate change, with an event that rare found to be 4°C hotter due to human-caused warming (Zachariah et al., 2022). Climate change affects events globally, for example the wind speed of Hurricane Helene hitting the US last year, causing widespread damages were made 10% more intense due to human induced climate change (Clarke, et al., 2024). While this might sound like an insignificant increase, damages are increasing non-linearly with high windspeeds and scientists shows that the 10% increase in the wind speed, meant a 44% increase in damages, which in the case of Helene amounted to USD 8.5bn (Sparks et al., 2024).

The existence of carbon budgets can give rise to the false impression that there is an additional amount of emissions that will not substantially increase the impacts of climate change. The reality is that every increase in CO2e concentrations results in an increase in the likelihood of these extreme weather events. Additionally, there is an increasing body of scientific evidence showing the direct and adverse economic impacts experienced as a result of major producers of carbon emissions resulting from this increase in extreme weather (Callahan and Mankin, 2025). This decade is critical to the trajectory of global climate change, and the opening of new oil and gas fields by the UK would contribute to the continued rise of extreme and highly-damaging weather events in the UK and around the world. The 245 MtCO2e of the Rosebank field amounts to over 80% of the UKs CO2 emissions in 2024 (313 MtCO2e) but it is almost half of the cumulative emissions from a country like Kenya, an economic powerhouse in Africa with a total of 551 Mt of CO2 emissions since their independence (Figures from Ritchie et al., 2020 (updated

2024)). Interpreting Rosebank's emissions as "insignificant" would hugely undermine the UK's position as a global leader on climate, and also the UK's status as an international supporter of humanitarian action and human rights across the world and at home. Signalling a lack of UK government interest in the international rights to life, health and other fundamental human rights that will be violated if countries do not uphold what they have legally agreed to by ratifying the Paris Agreement Article 4.3:

> *Each Party's successive nationally determined contribution will represent a progression beyond the Party's then current nationally determined contribution and reflect its highest possible ambition, reflecting its common but differentiated responsibilities and respective capabilities, in the light of different national circumstances.*

This means, every tonne of carbon emissions that can be avoided, must be avoided. Even small amounts of global warming continue to increase extreme weather conditions and with that increased loss of life, livelihoods, cultural and natural capital, as well as economic impacts in damages and lost GDP.

[redacted]

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London EC1V 9DD
[redacted]

Business Support Team
Offshore Petroleum Regulator for Environment and Decommissioning (OPRED)
AB1 Building
Crimon Place
Aberdeen AB10 1BJ
By email only: OPRED@Energysecurity.gov.uk

19 November 2025

Dear Sir/Madam,

UPDATED ENVIRONMENTAL IMPACT ASSESSMENT AND FURTHER INFORMATION FOR THE ROSEBANK FIELD DEVELOPMENT – OCEANA UK RESPONSE

Thank you for the opportunity to respond to the publication of the updated environmental impact assessment and other supporting environmental information for the Rosebank field. Oceana UK fights to ensure that UK seas get the protection they deserve. We use hard-hitting, science-based campaigns, legal challenges and advocacy to achieve measurable progress towards diverse and healthy UK waters, with ocean wildlife thriving alongside communities. As part of this, we campaign to end new offshore oil and gas production in UK seas and a move towards a fair transition to renewable energy in order to protect marine life, enhance energy security and create stable jobs.

We fundamentally disagree with the conclusions of Equinor's assessments and urge the Government to reject consent. The Rosebank field, as well as blowing a hole in the UK's net zero obligations and doing next to nothing for either energy security or energy prices, is already causing significant damage to marine ecosystems, even before full production. It is particularly disappointing to note that the gas export pipeline has been constructed through the Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area (MPA), despite this MPA being in unfavourable condition. The Joint Nature Conservation Committee (JNCC) made strong recommendations to protect the MPA from seabed damage from bottom towed fishing gear in 2024, reflecting its sensitivity to disturbance, and we feel that the pipeline represents a material change in the baseline environment that renders other aspects and the overall conclusions of the assessment outdated.

Approval of this project would deeply undermine the UK's global and domestic credibility and leadership on tackling the climate and biodiversity crises and signal that the UK Government is prioritising the profits of private oil and gas companies over the future of the planet and the just transition of communities and workers to a clean and green energy future.

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[redacted] Oceana UK

Contents

Summary

- **Approval of the Rosebank field would undermine any UK leadership position on phasing out oil and gas production, do almost nothing for energy security or consumer bills, and set a terrible precedent for future developments**. The evidence is clear that it will have an unacceptable climate and environmental impact on global climate and the local environment and the only right decision is refusal.
- **The updated environmental statement confirms the enormous greenhouse gas emissions that will be produced, which should in and of itself be reason for refusing consent.** We fundamentally disagree with Equinor's assessment that these emissions will not make a significant contribution to climate change, and furthermore consider that Equinor's justification that these emissions would be mitigated by global action to reduce emissions is both unrealistic and potentially unlawful. Various different assessments and estimates indicate that at current trajectories global greenhouse gas emissions are off track to meet the globally agreed goals set out in the Paris Agreement.
- **An ocean free of new oil and gas is essential for ensuring the recovery of our marine ecosystems and the delivery of UK and international biodiversity commitments.** Yet the revised assessment fails to acknowledge the impact that climate change is having specifically on the marine environment which is relevant to other direct impacts on the Rosebank field site and its surroundings. It also does not reference key updates on this topic that have been produced since 2022.
- **Equinor is wrong to conclude that internationally important species and habitats will not be significantly impacted by this development.** Evidence is clear and increasing that the day to day pollution, noise and disturbance of oil field operations have the potential to significantly impact marine habitats and species. These impacts have not in our view been adequately assessed.

- **Internationally important deep-water sponge aggregations are at particular risk and will already have been impacted by Rosebanks's infrastructure, despite being within a marine protected area (MPA)**. It is unacceptable that a pipeline has been allowed to be constructed through one of the most important MPAs in Scottish waters even before consent to extract has been granted. This represents a material change in the baseline that undermines the wider conclusions of the assessment. By also continuing to deny the presence of "coral gardens" in the area, despite the known existence of such coral features, Equinor are misinterpreting the evidence in favour of their chosen conclusion.
- **The impact of the development on blue carbon, an important function of marine ecosystems, is not considered in the assessment** which is a major omission. Evidence since the original environmental statement show not just the international importance of these Scottish blue carbon stores, holding more carbon than Scottish terrestrial habitats, but that habitats within the footprint of the proposed development include those of particularly high blue carbon value. This includes MPAs in the vicinity of the proposed oil field.
- **The risk of a catastrophic well blow-out or similar accident has been underestimated due to its deepwater operations**. If this occurred it would impact on numerous marine and coastal protected areas and jeopardise internationally important species of birds, cetaceans and seabed habitats. The possibility of a deep-water blow-out could also be made more likely by increased climate-driven intensity of storms and extreme weather conditions, making offshore operations more challenging and risky.

Key messages

1. Approval of this project will undermine the UK's global leadership on climate, nature and hold back the clean energy transition

Approval of the Rosebank field would undermine the leadership position the UK has built globally on phasing out oil and gas production, do almost nothing for energy security or consumer bills, and set a terrible precedent for future developments. Approval of this project will signal that the UK Government is prioritising oil company profits over the future well-being of the UK population, global climate and biodiversity, while ignoring the evidence that it will have an unacceptable climate and environmental impact on global climate and the local environment. The only right decision is to refuse consent for this development and all other future oil and gas fields.

With current political instabilities and the reversal of US climate commitments, it is particularly important that the UK leads by example globally and step up their climate action and provide a leadership position facilitating wider climate action globally.[1]

Leadership on climate action is important and highly relevant to marine conservation. Climate change is having a disproportionate impact on the developing world, and on coastal and island communities with a high level of dependence on the marine environment[2] and often where marine biodiversity is particularly high.[3] Marine ecosystems sustain an estimated 775 million people with a high reliance on marine resources[4] and provide essential services and economic benefits to many more. Climate change is already impacting on the capacity of fisheries to provide livelihoods and protect coastal communities and modelling studies have predicted that this will increasingly impact on global fishing livelihoods.[5] Climate change is also displacing millions of people every year[6], impacting on global health[7] and making the world a more dangerous place for everyone.[8]

2. The climate change impacts of this project are globally significant and incompatible with safe climate limits

We do not agree with Equinor's stated conclusions that the climate change impacts of the project are not significant and note various omissions in Equinor's updated information relating to climate impacts of the field development. These are also highlighted in Appendix 1.

Equinor's new assessment estimates that Rosebank will produce 254 million tonnes of carbon dioxide equivalent ($MtCO_2eq$) over its lifetime, including 249 $MtCO_2e$ in downstream Scope 3 Emissions. It is completely incorrect for Equinor to conclude that this is not significant and will not impact on climate change. One of the key claims is that the potential emissions would be insignificant globally and nationally if signatories can keep on track with Paris Agreement targets. Yet, last year (2024) has been confirmed as the first year when global temperatures exceeded 1.5 °C relative to pre-industrial levels, with multiple sources agreeing that surface air temperature reached 1.5 degrees of warming in 2024.[9]

Appendix 2 of our response presents examples of the clear evidence that parties are not on track to Paris Agreement targets from the UN, leading climate organisations and agencies and other climate scientists. This evidence clearly shows how a justification of wider global action to reduce other emissions is both misguided and potentially unlawful. The recently released 2025 Synthesis Report of Biennial Transparency Reports[10] also confirms that 'the current pace of change remains insufficient to meet global temperature goals. If the Secretary of State accepts the conclusion that this project will not have a significant climate impact and approves the oil field, this would undermine decades of climate action and leadership in the UK and set a hugely worrying precedent for further consents.

In describing it's Scope 3 impacts, the assessment says that *'This analysis recognises that, even in the most ambitious decarbonisation scenarios, there will be ongoing demand for oil and gas for some time, both in the UK and globally. The Rosebank Development is therefore evaluated in terms of its compatibility with these policies.'* Yet it has already clearly been established that approving <u>any</u> future oil and gas projects in UK waters, let alone one of the size of Rosebank, would not be compatible with climate obligations, and do little to nothing for either domestic energy security or energy bills.[11] Every contribution to warming will therefore make a significant difference, and a large project like this will add to emissions over future decades, taking us beyond 2050.

The updated environmental statement also misrepresents the International Energy Agency (IEA)'s report 'The Oil and Gas Industry in Net Zero Transitions (2023)[12] regarding the oil and gas industry's role in accelerating Net Zero transitions, stating that "*the analysis recognises that, even in the most ambitious decarbonisation scenarios, there will be ongoing demand for oil and gas for some time, both in the UK and globally. The Rosebank Development is therefore evaluated in terms of its compatibility with these policies".*

However, the same report states that in a net zero emissions (NZE) scenario, *"the overall trajectory of falling demand can be met without any approval of new long lead time upstream conventional projects".* It also states that "*The pace of reduction in oil and gas demand in the 2030s and 2040s now means that some production will need to be closed before fields have reached the end of their technical lifetime. For this reason, the framework specifies that no investment in any new long lead time upstream oil and gas projects is required from today to align with the outcomes of the NZE Scenario".*

The IEA have also strongly emphasised that if warming is to be confined to the IEA's 1.5°C Net Zero Emission Scenario no new oil and gas projects are required beyond those already approved.[13] This

was recently confirmed in new analysis, which highlighted the risks of continuing to license new offshore oil and gas.[14] Continuing to work toward the 1.5°C scenario is essential to limit global climate impacts on people and marine ecosystems.[15] Curbing climate change by reducing greenhouse gas emissions as rapidly as possible is essential to help safeguard a healthy future for our marine environment in the UK and globally.[16]

The assessment of the impact of Rosebank's Scope 3 emissions also does not explore the risks around climate tipping points adequately, only referencing it once in an Appendix. There is growing evidence that we are already approaching key oceanic tipping points and that their implications could be very serious for the acceleration of climate change and its associated impacts.[17] Omitting to link the emissions of this project to the risk of accelerating catastrophic tipping points is unacceptable and means that the assessment presented does not give a realistic picture of the risks involved.

3. Baseline climate impacts on the marine environment have not been adequately assessed

Very little consideration is given to the effects of climate change on the marine environment in the original assessment or in the updated material. Yet climate change, primarily caused by the burning of fossil fuels, is considered by many to be the most serious threat to the health of the marine environment and is acting in combination with other impacts, exacerbating negative effects.[18] These interacting impacts are not explored in our view in the documents supplied by Equinor.

There is a large body of evidence of impact of climate change on the UK's marine environment[19,20,21] and also of projected and expected impacts to come as greenhouse gas emissions continue, sea temperature increases, ocean chemistry changes[22], ocean circulation changes[23] and the wider implications of climate change impact on the marine environment, all of which are relevant to this updated assessment.

More specifically, there is evidence, not included by Equinor, of the climate change impacts on the specific species and habitats that are impacted on by the construction and operation of the Rosebank oilfield. Increased sea temperatures and decreasing oxygen levels can make cold water corals more susceptible to ocean acidification[24], horse mussel reefs (a cooler water habitat) disappearing from UK waters in the coming decades even under moderate climate change scenarios.[25] Increasing temperatures, increased storminess and sea level rise are already causing declines in UK seabirds.[26] Climate change is also impact marine mammals species in the region.[27] For example, pilot whale distribution has moved northwards faster than expected[28] and there are concerns about how increased incidence of harmful algal blooms may impact on marine mammals.[29]

The implications for the role of marine ecosystems in climate change mitigation and adaptation are not adequately assessed either. Whilst the emissions from Rosebank would be impacting the climate over coming decades, climate change will also be impacting on the local species and habitats' capacity to contribute to climate change mitigation and adaptation. The Offshore EIA Regulations are clear in that any EIA assessment of likely significant effects of the project should include those effects arising from a cumulative effect of the project on climate, and this should include these impacts.

The ocean conservation implications of climate change are already in evidence in UK waters and worldwide and every new oil and gas project contributes to accelerating climate change impacts in the marine environment. We are also concerned about how impacts on the marine environment are affecting the ocean's capacity to help protect us from the escalating impacts of climate change.

4. Rosebank's direct impacts on the marine environment are likely to be significant, potentially unlawful and warrant refusal on their own

We strongly disagree with the revised assessment of the wider environmental impacts that concludes (as the original environmental statement did) that the environmental impact of the Rosebank development is not significant.

The offshore oil and gas industry is already a major source of impacts on the UK marine environment, putting additional pressure on ecosystems which are also in decline because of climate change, damaging fishing techniques, pollution and invasive species.[30] Over recent years our research has highlighted the diverse marine conservation impacts associated with the offshore oil and gas industry.[31,32] These include well-known impacts such as major oil spills and the impact of seismic survey on marine mammals, but also a whole host of other impacts that affect all marine life, from plankton to whales, and which also impact on fisheries, blue carbon and other vital ecosystem services provided by the marine environment.

The ES and the updated information confirm that all these impacts will take place but concludes that they will not significantly impact on the marine environment. For a development of this scale and longevity (impacting on the marine environment for decades to come), this cannot be a logical conclusion. The routine impacts will put marine species, habitats and ecosystems at risk and the risk of a catastrophic oil spill could lead to the loss of sites and species of international importance.

Examples of species and habitats at particular risk include the great skua, which has been badly impacted by avian influenza[33], globally important seal haul out sites[34] and an area of regional importance to some of our most iconic whale and dolphin species.[35,36,37,38] Further details of these risks to marine ecosystems are outlined in the following sections

We also highlight these and other key omissions from the revised Environmental Statement in Appendix 1 that should be considered, in particular:

Impact on deep-sea sponge aggregations

The project requires a new pipeline to be built through an area of the Faroe-Shetland Sponge Belt MPA which is known to have sponge aggregations. Two sites with sponge aggregations were found on the pipeline route in Equinor's surveys. Sponge aggregations are a Vulnerable Marine Ecosystem (VME)[39] and an OSPAR Threatened and/or Declining Habitat [44].[40] They are very sensitive to development[41] and can take a long time to recover from impacts [46].[42] In the most recent assessment their status was 'poor' in all OSPAR regions and they were found to be deteriorating in condition throughout the regions too.[43]

OSPAR highlight the potential risks of climate change to this habitat, because deep waters are likely to see the most rapid changes as a result of climate change. The northern latitudes where they are found are also predicted to experience the most severe impacts from climate change. Higher sea temperatures and increased acidity will reduce suitable habitat for ecosystem engineer species and lead to declines. Long term impacts of climate change on deep-sea sponge aggregations are expected to be changes in distribution, extent and condition. The slowing down of the Atlantic Meridional Overturning Circulation will impact on population connectivity.[44]

The same assessment also highlighted the high sensitivity to human impacts and also that new research had highlighted the global importance of this habitat. The assessment also highlighted the role of MPAs in protecting this habitat, but in the case of the Faroe-Shetland Sponge Belt NCMPA this doesn't seem to have protected the habitat from destruction for the Rosebank oilfield pipeline.

Impact on other habitats, including corals and coral gardens

Other Vulnerable Marine Ecosystem indicator species are found within and adjacent to the Rosebank site including cup corals, sea pens, soft corals and gorgonians.[45] Coral habitats were recorded in Equinor's surveys within the oilfield site which could qualify as OSPAR priority habitat but a technicality around the definition of a coral garden is used to dismiss their importance. This is despite the official OSPAR Background Document for this feature states that "*The current extent of the habitat as defined by OSPAR is unknown, in particular the definition does not specify a particular density of organisms or species composition.*"[46]

We find it incredibly disingenuous, despite the clear existence of corals, to deny the existence of 'coral gardens' as a reason to justify proceeding, and the Government should be dismissive of such an argument. Regardless of the OSPAR definition, the multiple presence of sensitive, slow-growing soft coral species throughout much of the project area, and the other species that they support, clearly show the extent of the impact of subsea infrastructure and pipelines associated with the Rosebank field.

5. The impact on the Faroe-Shetland Sponge Belt Nature Conservation MPA in particular is unacceptable given its unfavourable condition

Global IUCN guidelines on MPAs are very clear that no oil and gas development or associated infrastructure is appropriate in an MPA.[47] Yet the decision to approve the construction of a gas export pipeline through the Faroe-Shetland Sponge Belt (FSSB) Nature Conservation MPA while consent is being resought marks a deeply damaging precedent, given the site's unfavourable condition. It also is inconsistent with stronger advice to protect the features of the site from destructive fishing, risking a two-tier approach to MPA management.

The Faroe-Shetland Sponge Belt (FSSB) Nature Conservation MPA was established in 2014 for the following conservation features:

- deep-sea sponge aggregations
- offshore subtidal sands and gravels
- ocean quahog aggregations
- continental slope
- continental slope channels
- iceberg plough marks
- prograding wedges and slide
- deposits representative of the West Shetland Margin paleo-depositional system
- key geodiversity area
- sand wave fields and sediment wave fields representative of the West Shetland Margin contourite deposits Key Geodiversity Area.

Of these features, deep-sea sponge aggregations, offshore subtidal sands and gravels, ocean quahog aggregations, continental slop channels and sand wave fields and sediment wave fields are considered to be in unfavourable condition. Any further damage to these features, however small, should be considered as breaching the conservation objectives of the site.

The FSSB NCMPA is also important for cetaceans, including fin whale, sei whale, minke whale, humpback whale, sperm whale, northern bottlenose whale, long-finned pilot whale and orca. As outlined in the original Environmental Statement, the export pipeline crosses the Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area which was designated to protect deep-sea sponge aggregations.

A new assessment was done of the FSSB MPA in advance of new fisheries restrictions which were brought in in October 2025 by the Scottish Government.[48] A large zone in the south of the MPA is now protected from mobile demersal and static fishing gear, which constitutes a high level of

protection, and a large zone in the north of the MPA was protected from mobile gear only. This will afford important habitats like coral gardens (or other coral communities) and sponge aggregations additional protection which will help achieve conservation objectives to recover the site to favourable conservation status.

At the same time as introducing these measures to better protect benthic communities in the FSSB NCMPA, we learn from the updated information that the gas export pipeline was installed through the middle of the site, over much the same features as are being sought to safeguard from destructive fishing. It is our view that the construction of the pipeline marks a material change to the baseline environment that renders other unchanged aspects of the assessment outdated, and undermines the overall conclusion of no likely significant effects, either to the FSSB MPA or more broadly. Indeed, the pipeline travels through the zone of the MPA now protected from mobile fishing gear and the zone now protected from mobile and static gear. This additional protection from fisheries should allow the recovery of habitats within the Faroe-Shetland Sponge Belt MPA, but the continued damage from oil infrastructure within its boundaries and construction and operation of the new oil field nearby will not be conducive to this.

Equinor are also taking an overly narrow definition of the suitable area for deep sea sponges in the FSSB MPA. In JNCC's advice on that site in relation to fisheries that recommended a full exclusion of bottom towed fishing gear, they note that "As our evidence-base improves, there is potential that we identify further records of deep-sea sponge aggregations in habitat considered suitable for colonisation (namely between the 400–600 metre depth contour in each site)".[49] This is worth noting as the ES in based on an expectation that these only occur in a much narrower band at between 450 and 530m in depth. This contradicts JNCC's more recent advice in relation to fisheries management and also JNCC's original supplementary advice on the management of activities within the FSSB MPA.[50] This wider range should have been used and would have spanned a greater distance than 10 km.

Notwithstanding the inconsistent approach between oil and gas and fisheries damage, allowing the field to go ahead would increase the harm caused to the MPA even further, and the companies and it will send an alarming signal to other developers that acting first, asking permission later, is a fair strategy.

Given the site's unfavourable condition in any case, infrastructure of this kind within an MPA surely goes against the JNCC advice for the sites states that protected features of the site should be recovered to favourable condition.[51]

6. The risk of oil spills across all development stages is unacceptable and underestimated

We believe that the risks of both chronic and acute spills at the Rosebank site have been systematically underestimated, and oil spills have already been documented at the Rosebank site event at the point of pre-production.

We have repeatedly documented elsewhere the insidious threat of chronic oiling to marine ecosystems[52] and global research is showing that is it is a widespread and under-reported issue.[53] A large oil development of this nature is expected to release many tonnes of oil in chronic oiling and small accidental spills over its lifetime. However, Equinor conclude that the impacts of these spills would be insignificant. We do not believe this to be the case, particularly when considering that this additional pollution will add to existing chronic oiling from many other oilfields and the wider pressures of marine pollution in the region, impacting on many elements of the ecosystem.

For example, the Faroe-Shetland Channel is important for cetaceans, including fin whale, sei whale, minke whale, humpback whale, sperm whale, northern bottlenose whale, long-finned pilot whale and orca. All of these species will be susceptible to ingesting or otherwise absorbing small quantities of oil when surfacing or through their food sources, leading to well-documented impacts on individuals and populations. This is in addition to their sensitivity to underwater noise operations from the Rosebank development. Research has also shown that benthic habitats like sponge aggregations and corals can be vulnerable to oil spills at depth and can take long periods of time to recover.[54,55] The wide ecosystem impacts can also be complex and long-lasting.[56]

These spills are often dismissed as short-lived and harmless, but recent research has shown how waters up to 8 metres below the slick may rapidly become contaminated by small scale surface slicks and the waters up to 500m away can contain levels of toxins that could have negative impacts on organisms from phytoplankton to marine mammals.[57] This is yet another example of oil industry impacts on marine ecosystems which combines with noise pollution, habitat loss, climate change and other threats, and undermining the recovery of our species and habitats.

This oil field is a deep one, with work taking place at a depth of 1100m, and according to the ES, requiring 'ability to operate in deep water in a harsh environment'. It is well known that deeper oil field sites present increased risk of major blowouts and spills, because of the increased complexity of the operation, difficult access to sites, and inhospitable deep-sea conditions[58], and the environmental statement acknowledges that the biggest risk from any offshore development is the potential for a large oil spill. However, the impact of a spill is dismissed because it is assessed as unlikely and a rare event.

Yet the environmental statement itself also states that oil from a blow-out at Rosebank could severely impact on at least 29 protected sites and many iconic conservation species including otters, seals great skua, gannet and sponge communities. Seabirds are particularly vulnerable to oil spills and some seabird populations that would be vulnerable to spills from the Rosebank Oil Field operations have already been badly impacted by avian influenza, e.g. the great skua. The seabird colonies closest to the Development are Foula and Papa Stour. Foula was identified as a hotspot for razorbill and European shag.[59]

7. The impacts on vital blue carbon stores have not been assessed despite new evidence

One key area that we believe has been completely overlooked is the ecosystem service provided by the marine environment in storing carbon which we believe will be subject to likely significant effect by the development, and therefore must be included in the Rosebank Environmental Statement to fulfil the requirements of the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020 (EIA Regulations) to include information on "*the direct effects and any indirect, secondary, cumulative, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the Project*".

Blue carbon is defined as 'carbon stored and sequestered in coastal and marine ecosystems, including tidal and estuarine salt marshes, seagrass meadows, and mangrove forests'[60] and also includes the geological substrate on which the marine ecosystem has developed.[61] Blue carbon is increasingly being recognised as both an important opportunity to keep carbon locked down where it already exists by effective protection, and to contribute towards reducing greenhouse gas emissions by restoring and enhancing high value carbon-storing habitats.[62,63] Conversely, where blue carbon resources are not protected they also become a source of greenhouse gas emissions when the habitats are degraded or destroyed by anthropogenic impacts.[64]

The requirement to provide an update on the Environmental Statement gave Equinor an opportunity to acknowledge the importance of blue carbon habitats in the development area and to assess the impact of the project on them. In 2023, Oceana wrote to OPRED and the NSTA to highlight the omission of blue carbon from the original environmental statement and to present some of the information that we thought was relevant. Much of this information was already available in 2022 but some has been published subsequently. However, the impacts of the development on blue carbon have not been specifically assessed in the updated submissions from Equinor and constitute a major gap in the assessment.

Since the original ES in 2022 and since Oceana's letter on the subject, two major reports have been published on the importance of blue carbon in Scottish waters.[65,66] These reports show not just the international importance of these blue carbon stores, holding more carbon than Scottish terrestrial habitats, but that habitats within the footprint of the proposed development include those of particularly high blue carbon value. This includes MPAs in the vicinity of the proposed oil field, which were assessed for their blue carbon potential and were found to be responsible for large quantities of carbon storage and accumulation.[67] It has been recommended that a precautionary approach should be taken to manage blue carbon habitats.

There are many potential risks to blue carbon habitats from the construction and operation of the site. The impacts of a large oil spill would affect many important marine and coastal blue carbon habitats but this specific risk to carbon disturbance, sedimentation or resulting oceanic or atmospheric takeup is not assessed.

8. Conclusion

For the reasons above, **we urge the government in the strongest possible terms to reject the updated environmental impact assessment and supporting information, and make it clear that it will refuse consent for the Rosebank field to go ahead**.

Appendix 1 – key omissions and gaps from updated DESNZ guidance[68]

DESNZ Guidance	Core Gaps in Equinor's environmental statement and further information
The ES, when evaluating the significance of likely effects of the project on the environment must also consider and contain information on cumulative effects, including: • The cumulation of effects with other existing or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.	Various gaps, including: • No additional information appears to be provided on the vulnerability of the project to climate change, despite evidence that climate change could exacerbate potential impacts of the project • Evidence of coral garden species from the original surveys of the site by DNV on behalf of Equinor not published • Overly narrow predicted band of deep sea sponge aggregations compared to publicly available JNCC advice • No references to updated assessments from the UK Marine Climate Change Partnership (MCCIP)

• The impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.	on the impacts of climate change on UK marine ecosystems. • No mention made of new fishing restrictions in the Faroe-Shetland Sponge Belt Nature Conservation MPA which is highly significant to the project, despite these measures publicly available • Wider assessment of cumulative and/or in combination impacts with other oil and gas activities, or with other activities in general, is insufficient.
Assessment methodologies will use a form of matrix that combines sensitivity of the receptor against magnitude of the impact to determine a level of significant associated with Scope 3 emissions.	This has not been provided - only the global climate was identified as a receptor, so a more detailed assessment of sensitivity and magnitude was not carried out.
Characterising scope 3 emissions from a project solely in numeric terms against global GHG emissions, because of the obvious difference in scale between individual projects and global emissions levels.	Various publicly available studies on the insufficient progress towards wider mitigation of fossil fuel emissions not included (see Appendix 2). The assessment is presented in relation to the current state of climate and global emissions-reduction pathways but concludes that there will not be a significant impact on climate, which given the evidence we present elsewhere is not a sound conclusion.
Mitigation measures: Should include a description of the features of the project or measures envisaged in order to avoid, prevent, reduce or offset likely significant adverse effects on the environment. Mitigation measures should be considered as early as possible.	Few practicable mitigation measures set out for the full Scopes 1-3 emissions sufficient to avoid or mitigate direct or indirect impacts on the environment, including within marine protected areas

Appendix 2: supporting evidence that world is not on track with mitigation of fossil fuel emissions consistent with meeting the global Paris Agreement

Evidence source	Date of publication	Relevant information presented
Biennial transparency reports and national inventory reports	31 October 2025 (not used in	• While substantial further progress can be expected in the period since 2022, several Parties may need to accelerate their actions or make additional efforts to keep their 2025 or 2030 targets within reach.

Conference of the Parties serving as the meeting of the Parties to the Paris Agreement Seventh session Belém, 10–21 November 2025.[69]	Equinor assessment)	• GHG emissions of reporting parties increased between 2005 and 2021, a trend driven by economic and population growth and increased industrial activity and transportation.
Emissions Gap Report 2025 Off Target: Continued collective inaction puts global temperature goal at risk.[70]	Nov 2025 (Not used in the Equinor assessment)	• Only about a third of parties to the Paris Agreement submitted new nationally determined contributions (NDCs) by 30 September 2025. • Global warming projections over this century, based on full implementation of all NDCs are now 2.3–2.5°C. Based on policies currently in place, the world is heading for up to 2.8°C of warming. Unprecedented cuts to greenhouse gas emissions are urgently needed. • The multi-decadal average of global temperature exceeding 1.5°C is very likely within the next decade. Every fraction of a degree avoided is crucial to reduce an escalation of the climate impacts that are harming all nations.
Mitigation efforts to reduce carbon dioxide emissions and meet the Paris Agreement have been offset by economic growth.[71]	17 October 2025 (not used in the Equinor assessment)	• Carbon intensity declined between 2015-24, but overall carbon emissions rose, due to the rapid rise in world GDP, which more than cancelled out the progress made. • Projected temperature increase to 2100 declined only slightly, from 2.6° C to 2.4 °C. The chance of staying below 2 °C remained low, at 17%. The most likely peak year for emissions is 2024, but with probability only 22%.
UNFCCC (2023), *Decision 1/CMA.5: Outcome of the first global stocktake*, UNFCCC Secretariat, Bonn.[72]	December 2023	• Implementation of current nationally determined contributions would reduce emissions on average by 2 per cent compared with the 2019 level by 2030 and that significantly greater emission reductions are required to align with global greenhouse gas emission trajectories in line with the temperature goal of the Paris Agreement • Policies implemented by the end of 2020 are projected to result in higher global greenhouse gas emissions than those implied by the nationally determined contributions, indicating an implementation gap, and *resolves* to take action to urgently address this gap; • Despite progress, global greenhouse gas emissions trajectories are not yet in line with the temperature goal of the Paris Agreement, and that there is a rapidly narrowing window for raising ambition and implementing existing commitments in order to achieve it;

		• The carbon budget consistent with achieving the Paris Agreement temperature goal is now small and being rapidly depleted.
The 2024 *Lancet* Countdown on health & climate change: facing record-breaking threats from delayed action.[73]	2024	• The world is now dangerously close to breaching its target of limiting global multiyear mean heating to 1·5°C. Annual mean surface temperature reached a record high of 1·45°C above the pre-industrial baseline in 2023, and new temperature highs were recorded throughout 2024. • Heat-related mortality of people older than 65 years increased by a record-breaking 167%, compared with the 1990s. People worldwide are also increasingly at risk from life-threatening extreme weather events. Between 1961–90 and 2014–23, 61% of the global land area saw an increase in the number of days of extreme precipitation, which in turn increases the risk of flooding, infectious disease spread, and water contamination.

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R0069

Att Hon. Sir Keir Starmer MP
cc. Offshore Petroleum Regulator for Environment
& Decommissioning Department for Energy Security and Net Zero
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Reference ES/2022/001

Dear Prime Minister Keir Starmer,

We, as organisations from the North East of Scotland, are writing to urge your government to reject the controversial Rosebank oil field in light of the recently published Environmental Statement on the field and admission of enormous Scope 3 emissions.

The Rosebank oil field will not service communities in the North East of Scotland. Instead we need clear market signals which encourage investment and generate jobs in renewables, and create pathways for oil and gas workers into good quality clean energy jobs.

The geological and economic reality is that the North Sea basin is declining. In the North East, we are living this reality every day and are looking to the government to provide a path to support for us to transition away from fossil fuels and see renewed economic prosperity where we live. Over the past decade, the jobs supported by the oil and gas industry have more than halved. Even though hundreds of new licenses have been issued and new fields consented, we have lost the equivalent of nearly 450 jobs a week on average. More extraction doesn't equal more jobs for us, and we've seen our rates of fuel poverty and reliance on food banks skyrocket at the
An analysis [1] published by the trade body Offshore Energies UK found that oil production declined by 36 per cent between 2019 and 2023, while natural gas production fell by 14 per cent. It warned: "Oil and gas investments have become a lot less profitable and competitive as commodity prices have fallen but not project costs and tax rates."

If approved by your government, the Rosebank oil field could lead to a net tax loss of over £250 million to the UK Treasury, thanks to the enormous tax breaks for new drilling in the UK. This is economic lunacy, when the field's owners - Equinor and Ithaca would earn an estimated £1.5 billion in profit - most of which would go to the Norwegian state, Equinor's majority owners.

Ithaca and Equinor say it will create 1,600 jobs at its peak with 450 "long-term jobs". However our view in the North East of Scotland, is that there is no such thing as a "long-term" job within the oil industry since the industry is coming to an end due to the basin's decline. Moreover industry claims have been shown to be vastly inflated [2], with at best 255 jobs created should Rosebank go ahead. We believe it would make better financial and ecological sense to properly invest in training and passports for oil workers, improve ports and infrastructure and support the UK to become a global leader in renewable production. These measures are supported by over 90% of over a thousand workers surveyed [3] in the Our Power report.

However, it is crucial to underline that the earth does not care about jobs or profits. It will continue to warm as long as we continue to burn fossil fuels. This enormous oil field would

produce more CO2 than the annual emissions of the 700 million people living in the world's poorest countries produce in a year, which is more than 249 million tonnes. President Trump has decided to withdraw the United States from the Paris agreement. The UN have reported that we have already failed to limit global heating to 1.5 degrees, pointing out that it is vital that this overshoot is as short as possible and as low in intensity as possible to avoid tipping points be it in the Amazon, in Greenland, western Antarctica or the coral reefs. Global leadership has never been more needed. For our sake. For our children's sake. For future generations' sake.

Prime Minister, this is your government's opportunity to show the UK – and the world – that it will put people and planet before polluters' profits.

We call on your Labour government to do the right thing by the communities of the North East of Scotland and reject Rosebank.

Sincerely

[]

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[2] https://www.stopcambo.org.uk/updates/msp-briefing-no-new-oil-and-gas-rosebank-oil-field
[3] https://friendsoftheearth.eu/press-release/uk-oil-workers-demand-just-energy-transition/
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R0070

Dear Keir Starmer we need a fair and just transition away from fossil fuels. Say no to Equinox and no to Rosebank.

[]

R0071

Ref: ES/2022/001
Rt Hon. Sir Keir Starmer MP
Prime Minister
10 Downing Street
SW1A 2AA

6 November 2025

Dear Prime Minister,

We, the 253 undersigned organisations, are writing to urge your government to reject the controversial Rosebank oil field.

Rosebank is a defining test of this government's credibility on climate change. This enormous oil field would produce more CO_2 than the annual emissions of the 700 million people living in the world's poorest countries produce in a year.

Rosebank's vast emissions make it incompatible with UK climate commitments. The scientific evidence is clear that there is no room for new North Sea oil and gas projects if we are to stay within the thresholds set out in the Paris Agreement, to which the UK is a signatory.

Beyond this, Rosebank is a very bad deal for the UK – it won't lower bills and would do almost nothing to boost energy security, given that most of it is oil destined for export. Its minimal gas reserves have the potential to cut our gas import dependency by, on average, just 1% a year (under the most favourable conditions and if no gas is exported).

Worse, Rosebank could lead to a net tax loss of over £250 million to the UK Treasury thanks to the enormous tax breaks for new drilling in the UK. This is economic lunacy, when the field's owners Equinor and Ithaca would earn an estimated £1.5 billion in profit, most of which would go to the Norwegian state, Equinor's majority owners.

More worrying is that, if approved, Rosebank could see nearly a quarter of a billion pounds flow to a company that is contributing to human rights violations in the occupied Palestinian territory. Delek Group, which operates in illegal Israeli settlements and is known to provide fuel to the Israeli military, is the majority-owner of Ithaca Energy, Rosebank's co-owner. Delek Group is on the UN database of companies involved in business activities that give rise to human rights violations against Palestinians.

In the midst of a climate crisis that is already bringing record heat, wildfires, flooding and drought to the UK and beyond, this Labour government must not cave into the pro-oil and

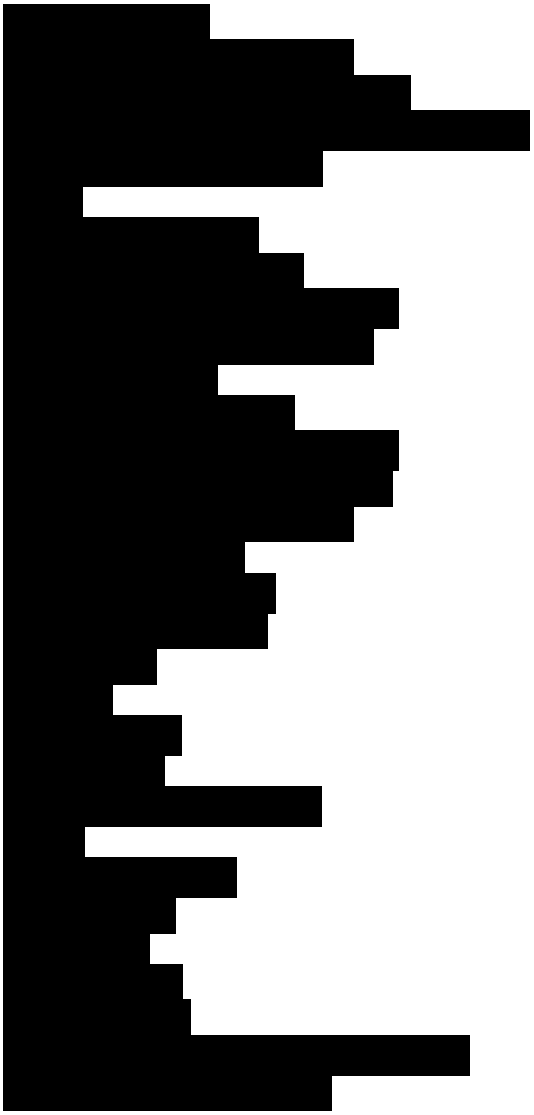
gas agenda of politicians who doubt the science of climate change and want to hold back our renewable energy industry and its thousands of jobs.

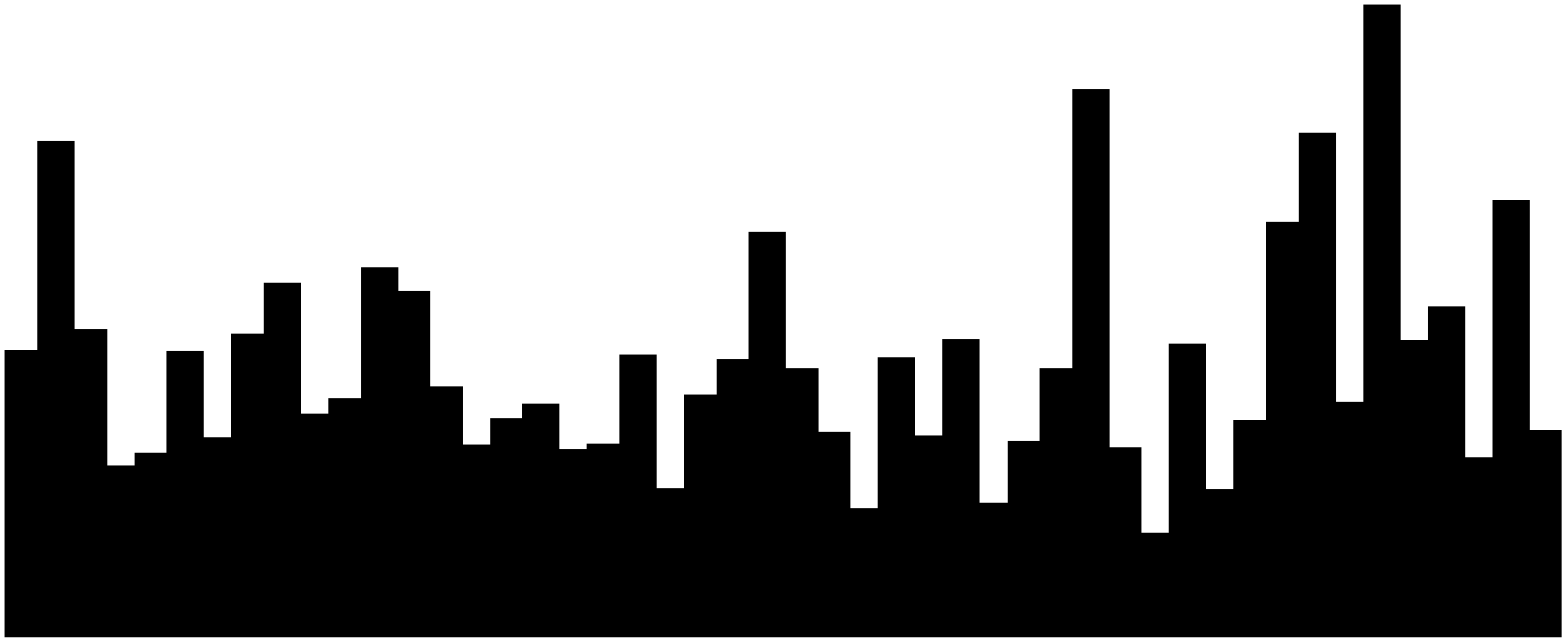
Your government has rightly committed to prioritising clean energy and a fair transition for workers and communities. Approving Rosebank risks sending contradictory signals to investors, undermining the confidence and capital needed to deliver the UK's clean power goal, locking us into more high-carbon infrastructure, and undermining the UK's reputation for climate leadership, which is more vital today than ever.

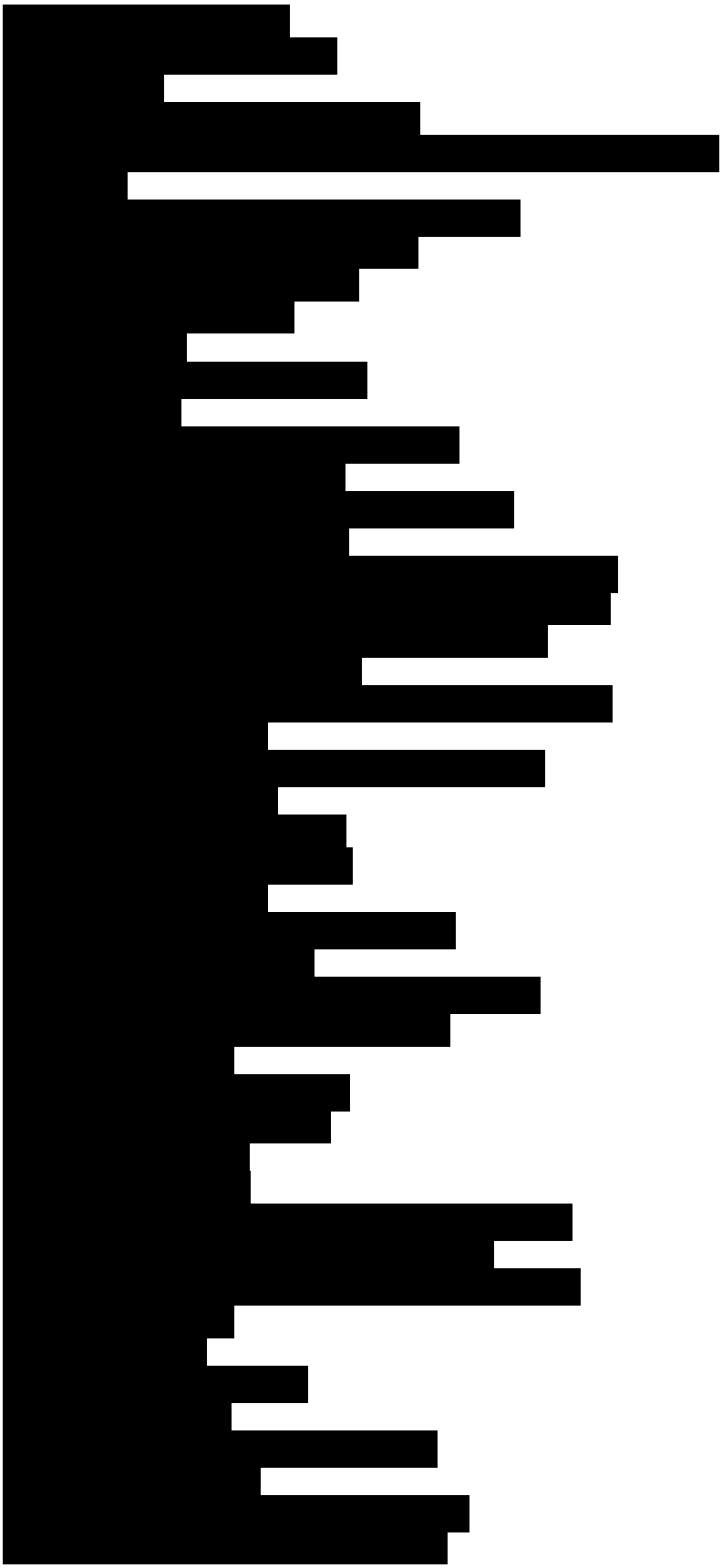
Prime Minister, this is your government's opportunity to show the UK – and the world – that it will put people and the planet before polluters' profits.

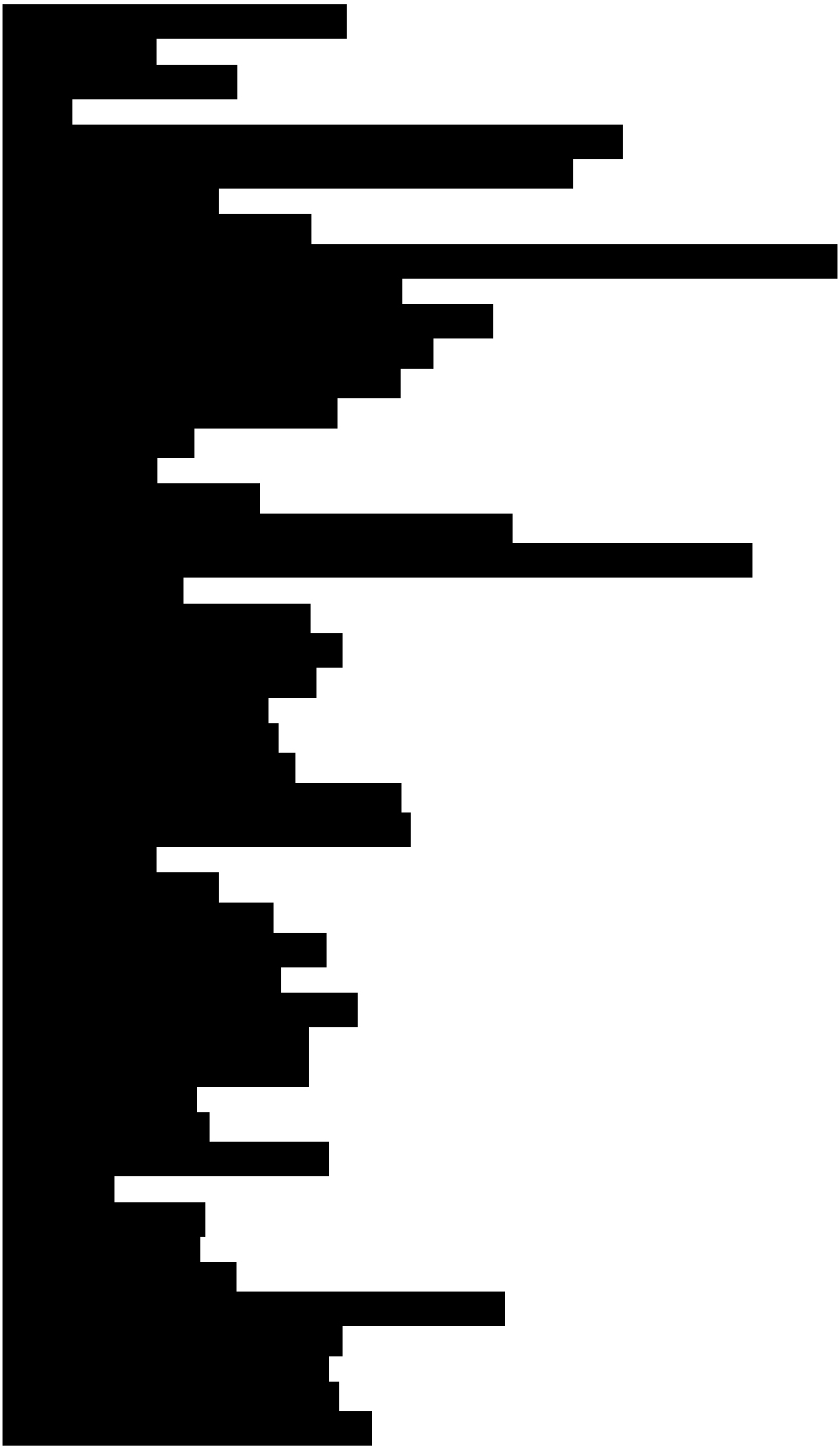
We call on your Labour government to do the right thing and reject Rosebank.

Sincerely,









[redacted]

Additional signatures, added after 6th November, but from organisations still wanting to be represented in this consultation submission:

[redacted]

IISD
International Institute for Sustainable Development

R0073

IISD Response to the United Kingdom Consultation on the Rosebank Field Development

[redacted]

November 2025

Summary

The British government has invited input into a consultation on Equinor's application for consent for the Rosebank oil and gas field development. The International Institute for Sustainable Development (IISD) welcomes the opportunity to contribute to the consultation.[1]

The further information submitted by Equinor is not consistent with supplementary guidance issued by the Department for Energy Security and Net Zero (DESNZ) on assessing the effects of downstream Scope 3 emissions on climate, published in June 2025.

Had the assessment been conducted in a manner consistent with the DESNZ guidance and with the available scientific evidence, it would inevitably have concluded that Rosebank would likely have highly significant environmental effects, as it would not be consistent with pathways aligned with Paris Agreement goals.

Therefore, **IISD recommends that the Secretary of State for Energy Security and Net Zero refuse to agree to the Oil and Gas Authority's grant of consent** following the Secretary of State's conclusion regarding the environmental effects of the project, so the project may not proceed.

Instead, investing in clean energy jobs and industries is the way forward, to ensure just transition and economic diversification for workers and communities. IISD looks forward to the British government's release of its response to the Building the North Sea's Energy Future consultation.

Introduction

The British Government's DESNZ has invited input into a consultation on Equinor UK Limited's application for consent for the Rosebank oil and gas field development. This follows the issuance by DESNZ in June 2025 of supplementary environmental impact assessment (EIA) guidance on how offshore oil extraction operators should address the greenhouse gases (GHGs) emitted when the extracted oil is ultimately burned ("end-use emissions").

1 [redacted]

That guidance was significant because it will ensure that the full effects of oil and gas extraction on the climate are recognized in consent decisions. Until now, EIAs have focused only on the emissions that occur in operating an oilfield, such as from fuelling support ships or powering rigs. But about 75% of the GHG emissions associated with a barrel of oil occur when the fuel is ultimately consumed (Union of Concerned Scientists, n.d.), which means the largest climate impact comes from the decision to extract the oil in the first place, rather than from a decision about how to extract it.

The guidance responded to the *Finch v Surrey County Council* judgment of June 2024, where the British Supreme Court ruled that planning authorities must assess "downstream" GHG emissions as part of the EIA process for fossil fuel projects. Equinor has now submitted further information containing an assessment of the Rosebank field's end-use emissions.

IISD welcomes the opportunity to contribute to this consultation. We are pleased that the new guidance is working as intended to encourage consideration of end-use emissions. The decision on whether to allow the grant of consent for Rosebank is a first test of the robustness of the regulation.

The Further Information on Scope 3 Emissions Is Not Consistent With DESNZ Guidance

The further information submitted by Equinor is not consistent with DESNZ guidance in three respects, outlined below.

Equinor Fails to Consider Global GHGs in Baseline Assessment

The guidance (DESNZ, 2025, p. 9) states that

> A reasonable future estimate of global GHGs affecting climate over the lifetime of a project needs to be considered as part of the baseline scenario … Therefore, the scope 3 emissions estimated to be produced by the project … should be evaluated in the context of a global baseline scenario of GHGs.

Equinor's consideration of future GHG emissions (Equinor, 2025, Section 3.3) describes various scenarios for future GHG emissions, but does not treat these as a *baseline*, as required by the guidance.

A baseline is "a reference point against which the impact of a new project can be compared" (Institute of Environmental Management & Assessment, 2022, p. 17). This is an essential component of impact assessment, as the impact of a project can be measured as the difference between the state of the environment with and without the project. This is clarified in the guidance (DESNZ, 2025, p. 9), which further states that

> OPRED [the Offshore Petroleum Regulator for Environment and Decommissioning] 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).

Equinor's description of future GHG emission scenarios does not serve this function, as these scenarios do not consider the world without the project and offer no means to compare how the environment changes with the addition of the project. Rosebank is an oil production project; as such, a relevant baseline is therefore a projection of oil production in the absence of the project. Equinor does not consider this.

Equinor even states (2025, p. 14, n.4) that "For the Assessment, a 'do-nothing' scenario (e.g., a scenario where the Rosebank Development does not proceed) would result in zero emissions." This is clearly incorrect: a world without the project (the baseline) is not one with zero emissions; if it were, there would not be a pressing climate problem.

Solely Numeric Assessment Does Not Give Meaningful Expression of Significance

The guidance (DESNZ, 2025, p. 12) states that

> 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.

Unfortunately, this is precisely what Equinor does; indeed, it is the only way in which Equinor considers the magnitude of impact.

In its assessment of the significance of the likely effects of Scope 3 emissions, Equinor states Rosebank's downstream Scope 3 emissions in numeric terms—14, 10, and 4 MtCO2eq in 2030, 2040, and 2050—against global GHG emissions in a range of scenarios from the Intergovernmental Panel on Climate Change (IPCC), United Nations Environment Programme, and International Energy Agency (IEA), observing that Rosebank's production would comprise between 0.06% and 0.08% of global oil production in a 1.5°C compatible pathway (Equinor, 2025, Sections 6.4.5 to 6.4.17).

However, the percentage of global oil production that Rosebank would provide is irrelevant to the assessment of whether it falls within a Paris-aligned pathway. It was precisely such simplistic numeric comparisons that the DESNZ guidance warned would not be meaningful. Even the largest fields in the world will comprise only a small share of global emissions—the "obvious difference in scale"—precisely because there are thousands of fields worldwide. Using this type of measure would thus lead to a conclusion that no oilfield ever has a significant environmental impact; hence, such an approach to assessment is clearly not meaningful.

Equinor Fails to Consider Rosebank in Cumulation With Other Projects

The guidance (DESNZ, 2025, p. 12) states that

> OPRED expects that ESs [environmental statements] will consider how the GHG emissions associated with a proposed project impact climate at a global level and a national level. This will likely involve assessment of the project's emissions against global

> climate objectives at the project level and in cumulation with other global projects[2]... 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.

Nowhere in its assessment does Equinor consider the effect of Rosebank "in cumulation with other global projects." These other global projects cannot simply be wished away; they are part of the world to which Rosebank would be added. Estimates of other global projects are readily available to companies like Equinor, including through oil industry data providers such as Rystad, Wood Mackenzie, and IHS Markit. They are publicly available through the Global Oil and Gas Extraction Tracker, which Equinor (2025, Section 6.4.2) cites, but does not use to assess Rosebank's impact in cumulation with other projects.

Without this, it is not possible to meaningfully assess whether the Rosebank field's oil production profile is within a Paris Agreement-aligned production pathway. Equinor's assertion (2025, Sections 6.4.9, 6.4.12) that Rosebank's production is within a Paris-aligned pathway is true only if one neglects these other global projects, as Equinor appears to be doing when it states that emissions are zero in the baseline, "do-nothing" scenario (above). Equinor is effectively assuming that the rest of the world's oil production all stops, leaving plenty of room in carbon budgets for Rosebank's production. This is not an appropriate way to consider the issue.

Equinor argues that the Rosebank field would be compatible with Net Zero Emissions (NZE) because production would decline between 2030 and 2050 at approximately the same rate as the decline in demand projected in the NZE scenario. However, this ignores NZE's clear implication that there is no room for new oil and gas fields after 2021.

Notably, the guidance requires that the assessment in cumulation with other projects should be global. This is because the oil market is global, and indeed the large majority of British oil production is exported to other countries (Global Witness, 2024). Therefore, Equinor's statement (2025, Sections 6.4.10 to 6.4.12) that British production is relatively small and declining is not relevant.

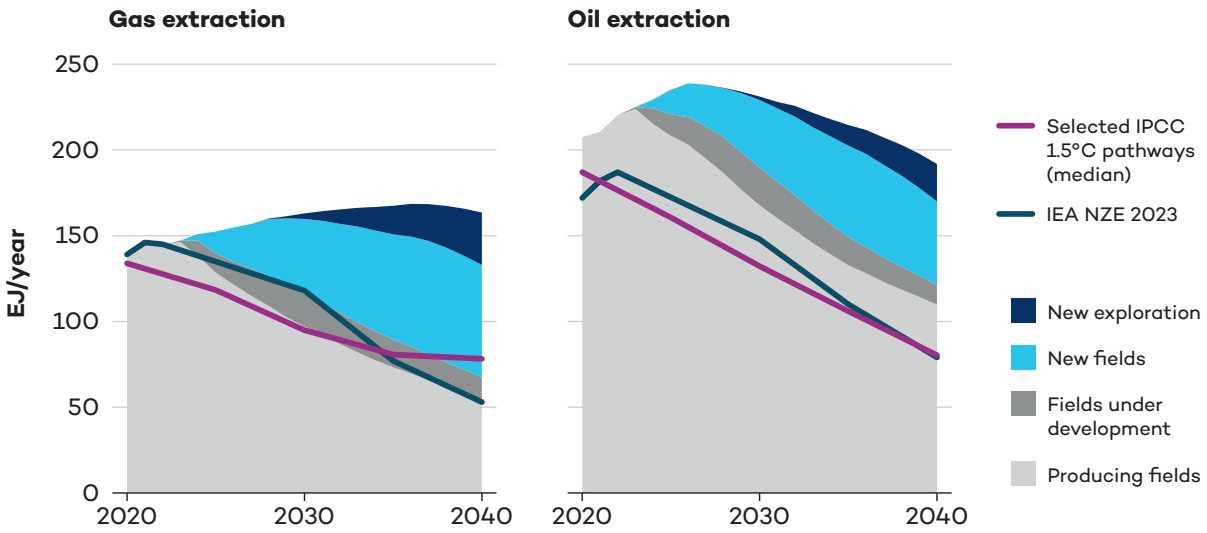
Developing Rosebank Would Not Be Consistent With Paris Agreement-Aligned Pathways

The science is clear that developing any new oil and gas fields is incompatible with the Paris Agreement target of limiting global warming to 1.5°C. In July 2025, the International Court of Justice (ICJ) confirmed that 1.5°C is the agreed legally binding temperature goal under the Paris Agreement (ICJ, 2025). In 2021, the IEA set out its NZE scenario, which provides a pathway for reaching net-zero by 2050 and staying within the 1.5°C limit. In NZE, no new oil and gas fields are approved for development after 2021 (IEA, 2021, 2023). Subsequent

[2] This follows from the requirement in Schedule 6(4)(e) of the Offshore EIA Regulations to consider in cumulation with other existing and proposed projects, noting that the cumulative effect of GHGs occurs at the global level.

analysis by IISD found that this same conclusion—that there is no need for developing any new oil and gas fields in a 1.5°C world—follows also from most[3] 1.5° C scenarios from the IPCC's Sixth Assessment Report and from all major 1.5°C scenarios published by universities, intergovernmental organizations, companies, and consultancies (Bois von Kursk et al., 2022). This conclusion was again confirmed in a peer-reviewed paper in Science co-authored by IISD experts (Green et al., 2024) (Figure 1). Existing oil and gas fields—those already in production or under development—are sufficient to meet energy demand in representative scenarios aligned with 1.5°C.

Figure 1. Forecasted global primary energy production from gas and oil compared with energy demand based on IEA NZE and selected IPCC 1.5°C scenarios



Source: Green et al., 2024.

It is important to note that not only is there no need for new oil and gas fields in 1.5°C-aligned scenarios, but there is also no room. It is particularly difficult to close existing fields, for economic and political reasons related to jobs, vested interests, and infrastructure lock-in effects, as well as legal reasons related to the costly compensation owed to foreign investors when governments attempt to do so.

Economically, once construction of an oil and gas field has begun and capital sunk, the operating company has an interest in continuing to operate that project for as long as possible, "as long as the product can be sold at a price greater than the marginal operating cost" (Green et al., 2024). Therefore, to protect their sunk investments, oil and gas companies "tend to lobby more intensely against environmental regulations that diminish the value of their existing assets than they do against regulations that would diminish the value of hypothetical future investments, in which their capital is not yet sunk" (Green et al., 2024). Trade unions, similarly, have more of an interest in protecting their members' existing jobs than in

[3] Scenarios whose usage of bioenergy with carbon capture and storage or fossil carbon capture and storage is categorized by the IPCC as raising medium to high feasibility concerns were excluded from the analysis. In total, 26 IPCC pathways were selected for the analysis out of those considered in the IPCC's Sixth Assessment Report.

ensuring hypothetical future jobs from new projects, so they lobby more intensively to protect existing jobs (Green et al., 2024). Due to these political pressures, legislators who support environmental regulation "find it politically easier to enact more stringent regulations on new entrants …than on incumbents" (Green et al., 2024).

Legal barriers also exist to governments enacting regulations that decrease the value of existing investments. Most notably, under international trade and investment treaties, foreign investors in fossil fuel projects can often enforce claims of strong protections against regulatory reforms that reduce expected profits in private tribunals for investor–state dispute settlement (Tienhaara et al., 2022). By contrast, decisions to approve or reject a new project are not legally constrained in this way.

It is, therefore, generally more economically, politically, and legally feasible to stop new fossil fuel projects than to close existing capacity early.

Thus, any new development of oil and gas fields would ultimately generate stranded assets—either because they have to shut down early or because existing fields will need to produce significantly less than their anticipated amounts—or push the world beyond the 1.5°C goal (Bois von Kursk et al., 2022; Green et al., 2024).

The Likely Climate Effects of the Rosebank Development Would Be Highly Significant

The DESNZ guidance (2025, p. 12) states that an assessment of significance "will likely involve assessment of the project's emissions against global climate objectives at the project level and in cumulation with other global projects."

The above analysis finds that the Rosebank project in cumulation with other global projects is not consistent with the global climate objective specified in the Paris Agreement of pursuing efforts to limit warming to 1.5°C (ICJ, 2025). This inconsistency implies that the project's environmental impact will be significant.

Guidance from the Institute of Environmental Management & Assessment (2022, p. 23) states that "There is a global GHG emission budget that defines a level of dangerous climate change, and any GHG emission that contributes to exceedance of that budget or threatens efforts to stay within it can be considered as significant."

In the baseline, "do-nothing" scenario, it should be assumed that other global projects will produce at the levels projected above (which is assessed based on economic modelling by Rystad). As Figure 1 shows, emissions from the oil from these other global projects would already exceed pathways consistent with 1.5°C. Emissions associated with Rosebank would therefore likely lead to further temperature increases beyond 1.5°C, which the IPCC has found to be very significant (IPCC, 2018).

The Secretary of State Should Refuse to Agree to Grant of Consent

The DESNZ guidance (DESNZ, 2025) states that in reaching a decision, the Secretary of State will form a view of the overall balance of advantage between any potential significant effects on the environment and wider benefits to the interests of the nation and any other relevant factors in proceeding with the project.

The economic benefits of the Rosebank project do not outweigh the significant negative environmental effects outlined above because the project would create few jobs, generate minimal revenues (with a likely net loss to the Treasury), and make no contribution to energy security.

The Rosebank project would not create many jobs. Rosebank is expected to support just 255 direct and 137 supply chain jobs in the UK on average over the lifetime of the field (Equinor, n.d.). It therefore would do little to stem the tide of decline in the North Sea workforce, which has seen jobs supported by the oil and gas sector more than halve in the past decade—a loss of more than 200,000 jobs—despite new field approvals (Bol, 2023).

Moreover, Rosebank would not be profitable in terms of revenues to Treasury. Analysis conducted by WWF Norway found that due to tax breaks for development costs, in a case where the long-term average oil price is USD 70 a barrel, Equinor and Ithaca Energy would make a GBP 1.5 billion profit, while the British government would suffer a net loss of GBP 258 million (Jones & Lysta, 2025). In a case where global efforts to limit warming succeed and oil prices fall to USD 40 a barrel, the Treasury's loss could reach GBP 1.3 billion. The oil price would have to stay over USD 70 a barrel for the Treasury to make net revenues on Rosebank.

Finally, Rosebank would make no contribution to British energy security. Rosebank's reserves are 90% oil, which would overwhelmingly be for export (Taylor, 2024). Its 10% of gas reserves "have the potential to reduce UK annual gas import dependency by just 1% on average (under the most favourable conditions and if no gas is exported)" (Carthy et al., 2025).

Therefore, **IISD recommends that the Secretary of State for Energy Security and Net Zero refuse to agree to the Oil and Gas Authority's grant of consent** following the Secretary of State's conclusion regarding the environmental effects of the project, so the project may not proceed.

Instead, investing in clean energy jobs and industries is the way forward, to ensure just transition and economic diversification for workers and communities. IISD looks forward to the British government's release of its response to the Building the North Sea's Energy Future consultation.

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INTERNATIONAL INSTITUTE FOR SUSTAINABLE DEVELOPMENT

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[redacted]

[redacted]

[redacted]

19th November 2025

Dear Secretary of State

Re Rosebank Oil and Gas Field Reference ES/2022/001

I am writing because the decision you are about to make on the development of the Rosebank Oil and Gas Field is one of the most important you will ever make for the future of our planet.

The International Panel on Climate Change said as far back as 2022 that oil and gas from existing oil and gas fields will exceed the world's carbon budget if we are to stay within 1.5°C. The UK government committed to make every effort to do this under the Paris Agreement, recognising this is the only way we can maintain a liveable planet. There is scientific consensus that this means no new developments of oil or gas fields, and no more coal mines, as we will have to reduce or halt production even from existing fields.

In this context it would be criminal to allow Rosebank to go ahead. Arguments about energy security do not hold water – the oil and gas will be sold on the world market – but even it they did, it makes no sense to increase energy supply in a way which puts our very survival at risk.

I urge you to take the full implications of the downstream emissions into account, and refuse permission for this oil field to go ahead.

Your sincerely

[redacted]

[redacted]

R0075

Hello,

I am emailing to register my opposition to the opening of Rosebank - the UK's biggest undeveloped oil field - for extraction of crude oil. If it goes ahead, it would worsen the climate crisis and lock us into decades more fossil fuels.

Here's why I oppose it:

Huge emissions — More CO_2 than 28 of the world's poorest countries combined in one year.

Won't lower bills or secure jobs — It won't cut energy bills or guarantee long-term jobs or real energy security.

Bad deal for the UK — UK taxpayers would cover 84% of its costs while getting very little back.

Handouts to oil giants — Norwegian company Equinor would get billions in tax breaks.

Linked to injustice — Some profits could go to a company operating in illegal Israeli settlements.

Damages our seas — The pipeline goes straight through a protected marine area.

Therefore, Rosebank is the defining test of this government's credibility on climate change. I urge you to reject this proposal and to invest instead in renewable energy.

Best wishes,

[]

R0077

It is criminal to approve Rosebank when we can invest in cheaper renewable energy

I live in an area with sevrral wind farms. Most locals report little disturbance and feel positive about having the 'in our back yard'

Don't listen exclusively to those with money snd the loudest voices

[]

R0078

Re: ES/2022/001

To whom it may concern,

I am writing to express my unreserved opposition to Equinor's application to develop the Rosebank oil field. It will do nothing for our so-called 'energy security', but instead pump yet more fossil fuels into global energy markets and yet more carbon into the atmosphere. As we hurtle past 1.5 degrees of warming, licensing such a development would be a reprehensible decision. I urge you to reject it and all other such applications!

Yours faithfully,

[]

R0079

Dear Business Support Team,

I am strongly against the development of the Rosebank oil field. Such a project should not be approved because it would require the UK public to:

- invest in the degradation of a sensitive natural habitat

- invest in increased climate disruption across the globe (costing money and lives)

- divert attention from a green and just transition (green infrastructure, job re-training)

We can't pretend we are living in the 1980s or the 1950s. The persons behind this project are seeking to enrich a small group of people, at the expense of a global majority of people who suffer daily from increased strain of climate change. Other-than-human life forms suffer through collateral damage. Children in the UK feel the strain of climate anxiety because they see nature and climate worsening and they do not see present adults (with social power) standing up for them.

I stand up for all life -- not the marginally increased comfort of a few privileged persons with mindsets stuck in the past. Please keep oil in the ground at Rosebank.

Kind regards,

[]

Reference: ES/2022/001

R0080

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Ground Floor, John Smith Court
2600 John Smith Drive
Cowley, Oxford
OX4 2JY

Phone: 01865 716452
www.oxfam.org.uk

20 November 2025

Rt Hon Keir Starmer MP
Prime Minister
10 Downing Street
London
SW1A 2AA

Re: Consultation on Rosebank Field Development

Dear Prime Minister,

I am following up on my letter to you in July this year to reiterate Oxfam's strong opposition to the development of the Rosebank oil field, and to add our support to the hundreds of organisations who have already raised their concerns.

For Oxfam and the climate-impacted communities we support, the climate crisis is an issue of justice. Across the world, as well as in the UK, it is communities who have contributed the least to the crisis who are bearing the brunt of its most severe impacts; from flooding and storms to extreme heat and food insecurity. Of course, we see this most acutely in the communities we work in partnership with communities across the Global South.

The UK has an overwhelming moral imperative to acknowledge our historical role in causing this crisis and our ongoing role in making it worse, and to act with urgency to cut our emissions. Anything less would be a dereliction of our duty, and one that I am sure you wish to avoid.

At its core, your Government's decision on Rosebank illustrates the deep inequality at the centre of the climate crisis: the lifetime emissions generated from Rosebank alone would exceed the combined annual CO2 emissions of the 28 lowest-income countries. These vast potential emissions make approval of Rosebank wholly incompatible with the UK's climate commitments, including the Nationally Determined Contribution (NDC) announced last year.

The evidence is clear: there is no room for new North Sea oil and gas projects if we are to stay within the thresholds set out in the Paris Agreement, to which the UK is a signatory. While staying within 1.5°C looks ever more challenging as result of the slow pace of climate action, every fraction of a degree of warming will be counted in lives lost.

The recent advisory opinion from the International Court of Justice states that governments must phase out fossil fuels and rapidly reduce emissions. To comply with this ruling, the UK must adopt targets that truly reflect its historical share of emissions and put in place robust plans to ensure these reduction targets are met. Approving this damaging development would place this at significant risk without increasing the UK's energy security nor reducing household

energy bills, with the oil flowing from this field sold on the open market. As the UN Secretary General has made clear: “The greatest threat to energy security today is fossil fuels.”

Your speech at COP30 in Brazil rightly emphasised the critical importance of delivering on the UK’s NDC, stating that the UK is “all in” on climate action and urging other world leaders to do the same. This position was highly encouraging and we commend this statement of intent. However, approving further oil and gas developments in UK waters would significantly undermine any form of leadership the UK hopes to show on international stage and erode the UK’s credibility at a time when international cooperation on confronting the climate crisis is simultaneously both fragile and essential. As such, Rosebank is a key test of your Government’s domestic and international credibility on climate action.

Alongside the serious climate damage this field would create, we also urge you to consider the legal human rights implications of the decision. If Rosebank is approved, it is reported that profits from the field could flow to a company that is on the UN database of companies involved in business activities in illegal settlements in the Occupied Palestinian Territory. I am sure you would agree that any such flow of funds would be of deep concern as it violates the International Court of Justice advisory opinion that directs third states to take steps to prevent trade or investment relations that assist in the maintenance of the illegal situation created by Israel in Occupied Palestinian Territory. We strongly encourage you to prevent this.

The real solution to the climate crisis is to accelerate investment in a just transition, one which delivers a fairer, greener future for impacted workers and communities, including those in the North-East of Scotland. The biggest threat to workers is a continuation of the unmanaged wind-down from oil and gas, one that has already seen major job losses from the sector.

Of course, achieving a fair, managed and faster transition will require significant investment. However, there are clear ways to raise revenue for this transition which are both fair and popular with the UK public. For example, research from Oxfam and Greenpeace this year shows that almost 8 in 10 people in the UK would support higher taxes on fossil fuel companies to pay for the climate and environmental damage they cause. At the same time wider taxes on polluters, such as a meaningful levy on those choosing to travel by private jet, coupled with fairer taxation on under-taxed wealth, have the potential to raise significant new resources for climate action domestically, as well as to fulfil the UK’s international climate finance promises.

In making this decision on Rosebank, the UK stands at a crossroads: act with integrity and urgency to champion a more just and liveable future for all or undermine international climate co-operation and risk undoing the progress on climate that this Labour government has made. This is a legacy-defining decision which will affect the UK’s climate action for decades to come. We encourage you to make the right choice and ensure this development is rejected.

Yours sincerely,

[redacted]

[redacted]

Oxfam GB

R0081

I am writing to formally object to the proposed Rosebank oil field on both planning and environmental grounds.

1. Climate and Environmental Impact

The development is incompatible with the UK's legally binding climate commitments. Opening a new large scale oil field would lock in decades of additional fossil fuel extraction at a time when scientific consensus is clear that new oil and gas projects undermine efforts to limit global warming. The project risks substantial lifecycle emissions, contributes to climate change, and conflicts with national and international targets for net zero.

2. Marine Ecosystem and Biodiversity Risks

Rosebank lies in a sensitive marine environment that supports vulnerable species, including seabirds and marine mammals. Increased industrial activity, noise pollution, and the risk of oil spills pose significant threats to biodiversity. These risks cannot be fully mitigated, and their potential long term ecological impact is unacceptable.

3. Incompatibility With Sustainable Development Principles

Planning policy emphasises the need for development that supports long-term environmental protection and a transition to clean energy. Investing in a new oil field diverts resources from renewable infrastructure, contradicts sustainability objectives, and introduces long term environmental liabilities.

4. Economic and Energy Security Considerations

There is no evidence that Rosebank meaningfully improves UK energy security, as production is primarily controlled and traded by private companies on global markets. Meanwhile, renewable alternatives offer greater stability, lower long term costs, and substantial job creation without the associated environmental harm.

For these reasons significant climate harm, risks to marine ecosystems, inconsistency with planning policy, and limited public benefit I urge decision-makers to reject the proposed Rosebank oil field development.

Kind regards

[]

Reference: ES/2022/001

Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
Department for Energy Security and Net Zero
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Crimon Place
Aberdeen
AB10 1BJ

Youth representation on the Rosebank field

Dear Secretary of State,

We are writing to express strong opposition to the development of the Rosebank oil and gas field, on behalf of seven organisations directly representing thousands of young people across the UK, and actively engaging millions more through our work.

The UK's 2035 Nationally-Determined Contribution (NDC) includes a commitment to "ensuring young people are engaged in both the design and implementation of climate-related policies".[1] The Secretary of State's decision on Rosebank holds huge significance for the direction of climate policy in this country, and therefore the lives and livelihoods of young people and future generations - it is essential that our voices are heard.

The International Energy Agency (IEA) is as clear as ever that we cannot sustain any new oil and gas if we are to limit warming to 1.5 degrees, or indeed even come close to this target.[2] The IEA's latest forecast (under political pressure) that demand for oil could continue to increase is a warning, not an endorsement – Rosebank's 250 million tonnes of oil would be catastrophic for communities in the UK and around the world. The Climate Change Committee is equally clear that opening new fields would entirely undermine the UK's climate commitments.[3]

[1] UK Government (2025), *United Kingdom of Great Britain and Northern Ireland's 2035 Nationally Determined Contribution*, p.28
[2] International Energy Agency, *The Implications of Oil and Gas Field Decline Rates*, pp.58-59
[3] Climate Change Committee, *Letter: Climate Compatibility of New Oil and Gas Fields*

The economic case for Rosebank is just as weak. In exchange for short-term profits – the vast majority of which would go to Equinor and Ithaca, not the British public who will carry 84% of the cost of developing Rosebank – we would be passing on a financial time bomb to future generations.[4] The leaders of tomorrow will be left to bail out and clean up these soon-to-be-stranded assets, while any extraction that does go ahead will only add to the 3.3% of GDP that climate damages will cost the UK economy by 2050.[5]

We need to invest instead in clean and renewable energy, that can genuinely provide energy security and reduce household bills, while building an economy that will be equipped to face this mounting environmental crisis. Young people want opportunities to train in green jobs that will transform our economy and last for decades, not to be stuck fighting for the mere 255 jobs this project would create in a dying sector.[6]

On Rosebank and beyond, there is a clear need for a more formal process to engage the voices of young people in environmental policy-making, in line with the important commitment made in the latest NDC. We would be happy to collaborate in shaping this process, to build long-term thinking into the UK's environmental and economic planning.

We urge DESNZ not to create a crisis that young people will have to solve. Rosebank makes no sense now, and it will have devastating environmental and economic impacts, not just in the long-term but for our immediate future.

UK Youth Climate Coalition

Green New Deal Rising

UK Youth for Nature

Force of Nature

Students Organising for Sustainability UK

People & Planet

Another Way

[4] Uplift, *Rosebank: Private Profit, Public Risk*
[5] Grantham Research Institute on Climate Change and the Environment, *Policy brief: What will climate change cost the UK?*
[6] Equinor, *Rosebank: Investing in energy security and powering a just transition*

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Offshore Petroleum Regulator for Environment & Decommissioning

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OPRED@Energysecurity.gov.uk

Response to Consultation on Rosebank (An assessment of the effects of downstream scope 3 emissions from the above project on climate).

Ref: ES/2022/001

[redacted] I fear for the future of the children who I have taught to respect the environment.

We do not need to extract any more oil. We already have more stockpiles of oil than we need to ruin the planet.

We should not be doing any more investment in oil drilling but should be focussing on rapid increases in renewables which are likely to be more cost effective long term.

Isn't it obvious that the burning of this oil will cause great harm to the planet? The environmental cost of burning the oil is huge.

I urge the Secretary of State to refuse consent for this application. I hope it will not be a case of "Milliband fiddles while the planet burns."?

Response by [redacted]
20/11/2025

[redacted]

Business Support Team
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Response to Consultation on Rosebank (An assessment of the effects of downstream scope 3 emissions from the above project on climate).

Ref: ES/2022/001

Response submitted by [redacted]

[redacted] I oppose the development of the Rosebank field for reasons set out below. I urge the Secretary of State to refuse a grant of consent for this development.

1. Introduction to Rosebank

The Rosebank oil and gas field owned by Equinor lies approximately half way between Shetland and Faroe Islands in the Offshore Corona Ridge area and is located in the Faroe Shetland channel. It is in close proximity to the Blackrock field owned by Siccar Point Energy and the Cambo field owned by Ithaca Energy. Also nearby are the operational Tormore and Laggan fields owned by a consortium led by Total Energy and the Tornado and Suilven fields owned by Ithaca Energy.

Equinor submitted an Environmental Statement in August 2022 which described the Scope 1 emissions of the development.

Following the Finch judgement by the Supreme Court, Equinor have been required by Department for Energy and Net Zero (DESNZ) to submit an additional Environmental Impact Assessment, (Equinor EIA 2025) covering the effects of downstream Scope 3 emissions on climate. The Assessment is submitted to the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) to inform the Government decision on whether to grant consent for the Rosebank Development. The key finding is that the Development will cause 254 million tonnes of CO2eq emissions which are almost entirely due to the downstream Scope 3 emissions. Equinor claim this is not significant.

This response demonstrates that the Equinor claim is incorrect and that the emissions are significant.

The Equinor EIA 2025 covers:
Chapter 3 - Determination of the environmental baseline
Chapter 4 - Environmental protection objectives and climate policies
Chapter 5 - Estimating Scope 3 emissions
Chapter 6 - Evaluating the significance of the likely effects.

Further relevant documents referred to below are:

- IEMA 2022 Assessing Greenhouse Gas Emissions and Evaluating their Significance
- DESNZ 2025 Supplementary Guidance for assessing the effects of downstream Scope 3 emissions on climate from offshore oil and gas projects
- Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020
- IEA https://www.carbonbrief.org/iea-fossil-fuel-use-will-peak-before-2030-unless-stated-policies-are-abandoned/ and https://www.carbonbrief.org/iea-reiterates-no-new-oil-and-gas-needed-if-global-warming-is-limited-to-1-5c/
- North Sea Transition Authority https://www.nstauthority.co.uk/news-publications/reserves-and-resources-as-at-end-2024/
- UNEP Production Gap report 2023 https://www.unep.org/resources/production-gap-report-2023
- IPCC AR6 https://www.ipcc.ch/assessment-report/ar6/
- Climate Action Tracker https://climateactiontracker.org/publications/warming-projections-global-update-2025/
- SEI Production Gap report 2025 https://www.sei.org/publications/production-gap-report-2025/
- Lancet Countdown report on human health and climate change 2025 https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(25)01919-1/fulltext
- Supreme Court - Finch judgement https://www.supremecourt.uk/cases/uksc-2022-0064
- UN Report on biodiversity loss https://www.un.org/en/climatechange/science/climate-issues/biodiversity.

2. Determination of the Environmental Baseline (Equinor EIA Chapter 3)

Equinor identify that the DESNZ Supplementary Guidance states that GHGs have a global effect on climate and therefore a global baseline scenario of GHGs must be considered in the ES. The asssessment considers the global position by reference to IPCC Shared Socioeconomic Pathways (SSPs).

They note that the remaining global carbon budget to maintain temperature increase below the Paris Agreement goal of 1.5C is of the order of 130 Gt CO2eq. They also note that current annual emissions are of the order of 55 Gt CO2eq and increasing but they fail to draw the obvious conclusion that the remaining carbon budget will be exhausted in less than 3 years if those emissions continue.

The Supplementary Guidance also notes that “OPRED expects that ESs will consider how the GHG emissions associated with a proposed project impact climate at a global level and a national level. This will likely involve assessment of the project’s emissions against global climate objectives at the project level and in cumulation with other global projects, as well as against national objectives and targets, where appropriate.” Equinor have not set a baseline for assessing the project's Scope 3 emissions against national objectives and targets.

3. Environmental Protection Objectives and Climate Policies - Equinor EIA Chapter 4

This chapter sets out the main international and national climate objectives, policies and legal instruments.

Equinor describe the UK Climate Change Act 2008 and the UK Carbon Budgets. They note that Carbon Budgets are not directly comparable to Scope 3 emissions since the carbon budgets are tracking UK terrestrial emissions arising from consumption of fossil fuels not from production of fossil fuels other than Scope 1 emissions. They state that the Carbon Budget is not directly or usefully comparable with a gross emissions estimate based on production volumes.

However this shows a misunderstanding of the purpose of the Climate Change Act and the Carbon Budgets. As acknowledged in the EIA, climate change and greenhouse gases are a global not a local issue. The purpose of the Climate Change Act and Carbon budgets is not to protect the UK population from CO2 emissions and consequences but is the UK Governments response to the international/global concerns about these issues. As such, it is therefore useful to compare the Scope 3 emissions with the carbon budgets in order to understand how the UK Government is progressing towards the Paris Agreement objectives.

The UK carbon budget for the 25 year period of the Rosebank Development (2026 to 2051) is approximately 4,000 MtCO2eq from the published 4th to the 7th carbon budgets plus a guesstimate of 250 MtCO2eq from the 8th carbon budget, totalling 4,250 MtCO2eq or an average of 170 MtCO2eq per year.

This may be compared with the Rosebank emissions of 254 million tonnes of CO2eq, equivalent to 1.5 years of the average annual UK carbon budget. The Government would suffer a huge loss of credibility on the global stage if it approved such a significant fossil fuel project with emissions equivalent to 1.5 years of UK terrestrial carbon budget.

4. Estimating Scope 3 Emissions - Equinor EIA Chapter 5

Equinor note that Scope 1 emissions would be 5.6 MtCO2eq.

Scope 3 emissions from combustion of oil are put at 227.1 MtCO2eq and from combustion of gas at 21.6 MtCO2eq giving total Scope 3 emissions of 248.7 MtCO2eq. Total project emissions, Scope 1 and Scope 3 are 254.3 MtCO2eq.

This all appears to be calculated in accordance with the Supplementary Guidance.

5. Evaluating the Significance of the Likely Effects - Equinor EIA Chapter 6

The Offshore EIA Regulations Schedule 6(4) and 6(5) require inter alia:
4. An assessment of the likely significant effects of the project on the environment, including those resulting from—
(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
(e) the cumulation of effects with other existing or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;

(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;

5. The assessment under paragraph 4 must—
(a) cover the likely significant effects on—
(i) population and human health;
(ii) biodiversity, with particular attention to species and habitats protected under any law of any part of the United Kingdom that implemented Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora and Directive 2009/147/EC on the conservation of wild birds;
(iii) land, soil, water, air and climate;
(iv) material assets, cultural heritage and the landscape;
(v) the interaction between the factors referred to in paragraphs (i) to (iv);
(b) cover the direct effects and any indirect, secondary, cumulative, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project, including any effects on the environment in other countries;

The Supreme Court ruling in Finch emphasised the need for comprehensive and high quality information about the likely significant environmental effects of a project. Equinor have failed to undertake these assessments or provide the information required.

4(d) and 5 (a)(i) Risks to human health.
Equinor could have mentioned the recent Lancet Countdown study on human health and climate change which finds that global heat-related mortality reached an estimated average 546 000 deaths annually, deaths from wildfire-derived PM2·5 air pollution reached a record-high 154 000 in 2024, infectious disease, flooding, drought, storms are all increasing rapidly due to climate change and having a major effect on human health.

4(e) Cumulation of effects.
Equinor have failed (EIA Note 58) to consider the Rosebank Scope 3 emissions in cumulation with the other “planned future projects” such as West of Shetland fields or the UK Continental Shelf fields as required by the Supplementary Guidance and Schedule 6 of the Offshore EIA Regulations. Equinor misunderstand the requirements of the Guidance and Regulations. Nowhere does the Guidance or Regulations say these have to be “nearby oil and gas opportunities” as stated in Note 58.

Development of other West of Shetland fields under consideration could cause further emissions of 480 MtCO2eq, double the emissions of Rosebank. Development of all the probable and contingent UK Coastal Shelf reserves identified by the North Sea Transition Authority could cause Scope 3 emissions of more than 4000 MtCO2eq. The emissions of the Rosebank project would be regarded as significant in the context of WoS or UKCS fields.

4(f) and 5 (a) (iii) The impact of the project on climate.
Equinor have used a matrix approach considering magnitude vs sensitivity for determining significance as suggested in the Supplementary Guidance. It is agreed that the sensitivity of the climate to GHGs will be high.

Equinor include Table 16 (summarised below) quoted from the UNEP SEI Production Gap report 2023. They claim this shows that the Rosebank emissions are within a Paris aligned pathway. However, the same data in the UNEP report shows that Government plans and projections for oil production (added to the table below) are much higher than either of the pathways. It is clear that global oil production is not following a Paris aligned pathway and shows no sign of reducing.

Pathways	2030	2035	2040	2045	2050
Oil mb/day consistent with 2.0C pathway	99.65	94	83.03	69.78	57.83
Rosebank P10 profile % of 2.0C pathway	0.07	0.06	0.05	0.05	0.03
Oil mb/day consistent with 1.5C pathway	88.55	78.92	63.22	45.85	32.2
Rosebank P10 profile % of 1.5C pathway	0.08	0.07	0.07	0.07	0.06
Government plans and projections mb/day	115	114	114	115	116

Equinor have ignored the cumulative effect of other existing and planned projects which must be considered.

The Equinor matrix (EIA Table 14) summarised below, sets out a range of four emissions profiles from High to Very Low. Columns for IPCC SSPs and temperature range have been added to the matrix for clarity.

Emissions Profiles	IPCC SSP	Temperature Rise	Criteria (summarised)	Consequence	Significance of effect on climate
High	SSP 3-7.0	3.6C (2.8 - 4.6)	Not compatible with holding temperature below 2.0C or UK climate policies and strategies.	Major	Significant
Intermediate	SSP 2-4.5	2.7C (2.1 - 3.5)	Not compatible with holding temperature below 2.0C. Partially aligned with UK climate policies and strategies.	Moderate	Significant
Low	SSP 1-2.6	1.8C (1.3 - 2.4)	Consistent with holding temperatures below 2.0C. Aligned with UK climate policies and strategies	Low	Not significant
Very Low	SSP 1-1.9	1.4C (1.0 - 1.8)	Consistent with holding temperatures below 1.5C. Goes beyond requirements of UK climate policies and strategies.	Negligible	Not significant

Equinor state that the Rosebank Scope 3 emissions are not significant as they are within a Paris aligned production pathway although they do not state which of the above pathways is applicable.

They have assumed that other parties to the Paris Agreement will achieve their goals. However, the Supreme Court in the Finch judgement states that “It was a clear legal error to regard this aspect of planning policy as a justification for limiting the scope of an EIA. An assumption made for planning purposes that non-planning regimes will operate effectively to avoid or mitigate significant environmental effects does not remove the obligation to identify and assess in the EIA the effects

which the planning authority is assuming will be avoided or mitigated." In other words, Equinor have a duty to assess the known and understood effects of the development on climate irrespective of whether the Paris agreement succeeds or not.

The present state of progress on emissions is given by Climate Action Tracker showing that the world is currently on track for about 2.6C of warming by 2100. The International Energy Agency IEA warn that even if all countries implement the policy changes they have promised, (STEPS scenario), temperatures would still rise by 2.5C by 2100. These emissions paths are equivalent to the Intermediate profile above (SSP 2-4.5) and show that the impact of the Rosebank development is significant.

The IEA also says that the world would not need to invest in new oil and gas projects if demand for the fuels fell in line with the 1.5C limit on global warming. That clearly demonstrates that the Rosebank project is not compatible with Paris aligned pathways.

The claim by Equinor that Rosebank is compatible with a Paris aligned pathway and that the impact is not significant is faulty.

In conclusion,
the sensitivity of the receptor (climate) is high,
the consequence of the project is moderate,
the impact of the project is significant.

5 (a) (ii) Biodiversity

Biodiversity is collapsing. The recent UN report on biodiversity states that the main driver of biodiversity loss remains humans' use of land – primarily for food production. But climate change is playing an increasingly important role in the decline of biodiversity. Climate change has altered marine, terrestrial, and freshwater ecosystems around the world. It has caused the loss of local species, increased diseases, and driven mass mortality of plants and animals, resulting in the first climate-driven extinctions. The report notes that biodiversity is essential for limiting climate change. The Rosebank GHG emissions will contribute to loss of biodiversity.

Equinor failed to assess the effect of Rosebank GHG emissions on biodiversity as required in the Offshore EIA Regulations.

6. Alternatives and Mitigations

The best way to mitigate the effect of the project is to leave the oil where it is.

Do we actually need the Rosebank oil? Governments plan to produce 120% more than the volume of fossil fuels in 2030 than would be consistent with limiting global warming to 1.5°C, and 77% more than would be consistent with 2°C, according to the SEI 2025 Production Gap Report. The oil from the Rosebank field will only add to the already huge global surplus of oil which will have to be left in the ground.

The IEA predict that demand for oil will peak by 2030 and decline slowly thereafter. Equinor share holders should consider whether this white elephant project will become a stranded asset in the near future. Equinor would likely do much better to invest in large scale solar energy giving a greater return more quickly than investing in Rosebank.

Rosebank Field Development, reference number ES/2022/001

Public Consultation Representation by Scientists for Global Responsibility

About Scientists for Global Responsibility (SGR)

SGR is an independent UK-based membership organisation of natural scientists, social scientists, and engineers, together with other supporters. Our membership currently includes about 500 professionals, with several thousand followers on social media. SGR promotes science and technology that contribute towards peace, social justice and environmental sustainability. To this end, we carry out research, education and advocacy work on a range of issues including climate change.

Representation

SGR calls on the Secretary of State to reject the proposals for the development of the Rosebank oil and gas field.

As the application states, the exploitation of the field would result in the emission of 254 million tonnes of carbon dioxide equivalent (tCO2e) over the lifetime of the project, as the fuel is burned. This is equivalent to approximately 68% of the UK's greenhouse gas (GHG) emissions in 2024, so it is a globally significant quantity.[1]

According to research published in the leading scientific journal, Nature, in 2021,[2] the climate change caused by additional emissions of roughly 4,400 tCO2e will likely cause one extra premature human death before 2100. Therefore, the emissions from the Rosebank field would lead to roughly 57,000 additional deaths. This study only considered deaths related to extreme heat, so is very conservative. Indeed, a further study, published in Nature in 2023,[3] implied that the death rate per tCO2e could be significantly higher. Comparable figures have been found in other studies.[4]

Another way of estimating the damage caused by these emissions is to calculate the total cost to the whole economy. This is known as the 'social cost of carbon'. An estimate from 2021 put this figure close to 260 US$ per tCO2e.[5] However, updated estimates have put this figure markedly higher – at over $1,500 US$/tCO2e.[6] Using the latter estimate would mean that the social cost of carbon emitted due to the Rosebank field would be over US$380 billion – far in excess of any benefits that might arise from its exploitation.

One further point should not be forgotten. These studies do not take full account of the risks of exceeding 'Earth system tipping points', after which rapid, irreversible and potentially catastrophic climate change occurs.[7] These tipping points include widespread die-offs of key ecosystems (such as coral reefs and tropical forests), catastrophic melting of ice-sheets, disruption of major ocean currents, and methane releases from previously frozen geological formations. With the Paris Agreement's temperature target of 1.5°C soon to be exceeded, the risk of passing these tipping points is rising rapidly. Every new fossil fuel extraction project that is opened increases the risk of passing these tipping points. Due to its large size, the Rosebank field would raise the risk significantly.

For these reasons, SGR strongly believes that the Rosebank project should be refused.

Contact:
[redacted]

References

[1] DESNZ (2025). Provisional UK greenhouse gas emissions statistics 2024. https://www.gov.uk/government/statistics/provisional-uk-greenhouse-gas-emissions-statistics-2024

[2] Bressler R (2021). The mortality cost of carbon. Nature Communications, 12(1), 4467. https://doi.org/10.1038/s41467-021-24487-w

[3] Lenton et al (2023). Quantifying the human cost of global warming. Nature Sustainability, 6, 1237. https://doi.org/10.1038/s41893-023-01132-6

[4] For example: Parncutt R (2019). The human cost of anthropogenic global warming: semi-quantitative prediction and the 1,000-tonne rule. Frontiers in Psychology, 10, 2323.

[5] Bressler (2021) – as note 2.

[6] Bilal A, Kanzig D (2024). The macroeconomic impact of climate change: global vs. local temperature. National Bureau of Economic Research, USA. https://www.nber.org/system/files/working_papers/w32450/w32450.pdf

[7] Lenton et al (2025). The Global Tipping Points Report 2025. https://global-tipping-points.org/

R0086

Dear Opred Business Support Team,

Thank you for the opportunity to comment on the new information provided for the Rosebank Field Development. The UK Technical Services Navigation team of the Maritime and Coastguard Agency (MCA) has reviewed the documents received and would like to comment as follows:

The Maritime and Coastguard Agency is a statutory consultee and/or primary advisor (depending on the relevant legislation) to the marine licensing and offshore consenting regulators throughout the UK. We have an interest in all works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations.

We note that the potential impacts for Shipping and Navigation that were identified in the Rosebank Field Environmental Statement (ES) from 2022 remain unchanged and that the mitigation measures in Section 8.4 of the ES will be adhered to throughout the project.

The MCA confirms we have no comment on the additional information provided on 15th October 2025 which includes the Response to Requirements 1, 2 and 3. This is on the understanding that all maritime safety legislation is adhered to, a Risk Assessment (Shipping and Navigation) and Collision Risk Management Measures are in place and that the MCA response that was sent in September 2022 is followed.

Kind regards

[]

Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
Department for Energy Security and Net Zero
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By email: OPRED@Energysecurity.gov.uk
20 November 2025

Dear Secretary of State,

Rosebank Field Development - Consultation Response - Ref. ES/2022/001

Introduction

1. This document sets out Uplift's response to the current consultation by the Offshore Petroleum Regulator for Environment & Decommissioning (**OPRED**) on the Further Information regarding the Rosebank Field Development (**Rosebank Project**), for which Equinor UK Limited on behalf of the Licensees (Equinor UK Ltd. and Ithaca SP E&P Ltd.) has made an application for consent to the Oil and Gas Authority (**OGA**, operating as North Sea Transition Authority (**NSTA**)).

2. In reviewing the Rosebank Project's Further Information (**Further Information**), we consider that it fails to comply with the requirements of the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environment Impact Assessment) Regulations 2020 (**EIA Regulations**), and the Government's Supplementary Guidance for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects (**Supplementary Guidance**), as covered in further detail below. Specifically, there is:

    a. a failure to adequately assess the significant effects of scope 3 emissions from the Rosebank Project on the climate;

    b. a failure to properly assess the significant effects of the Rosebank Project on the environment that are not limited to downstream scope 3 emissions; and

    c. a lack of credibility in claims made regarding 'other relevant information for the Secretary of State (**SoS**) to consider'.

A. Significant effects of downstream scope 3 emissions from the Rosebank Project

3. The scope 3 emissions from the Rosebank Project would have a significant effect on the climate. As the details in Section A below demonstrate:

   a. the Further Information fails adequately to assess the effects of scope 3 emissions from the Rosebank Project on the climate, leading to an incorrect conclusion on the significance of scope 3 emissions from the project;

   b. the Further Information fails to comply with the Government's Supplementary Guidance in how to perform such an assessment; and

   c. the Rosebank Project is not compatible with a proper assessment of scope 3 emissions.

Misleading comparison to global totals

4. The Further Information fails to comply with the Supplementary Guidance in evaluating the significance of scope 3 emissions, in the context of comparing to global greenhouse gas (**GHG**) emissions. It instead compares the Rosebank Project's projected oil and gas production to total global oil and gas production and total global demand under a range of Integrated Assessment Model (**IAM**) pathways associated with different temperature outcomes.

5. The Further Information expresses the Rosebank Project's P10 production profiles as a proportion of global demand under the International Energy Agency's (**IEA**) Stated Policies Scenario (**STEPS**), Announced Pledges Scenario (**APS**), and Net Zero Emissions by 2050 Scenario (**NZE**). It concludes that "*the consequence is assessed as low because (…) Rosebank production profiles, and hence the Downstream Scope 3 Emissions, also decline on a similar pathway [to global demand]*".[1]

6. The Further Information also directly compares the Rosebank Project's projected oil and production with total global oil production pathways. It sets out that "*[t]he data in Table 16 indicates that Rosebank Development production comprises between 0.06% and 0.08% of global oil production in the 1.5°C compatible case and between 0.07% and 0.03% of global oil production in the 2°C compatible case*".[2] On this basis, the Further Information concludes that *"the Rosebank Development P10 production profile is within a Paris Agreement aligned production pathway*" and "*[t]he consequence is therefore assessed to be low*".[3]

7. This approach directly contradicts the Supplementary Guidance's position on the inappropriate use of global-scale comparisons, which recognises that "*characterising*

[1] Equinor. *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* (**Further Information - Assessment of scope 3 emissions**), p.50.
[2] Equinor, above note 1, para. 6.4.9.
[3] Equinor, above note 1, para. 6.5.6.1.

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".[4]

8. By comparing the output of a single field to total global oil and gas supply or demand, the analysis is structured to render any individual project inherently 'insignificant', regardless of its real and additive impact on cumulative emissions. This reasoning would imply that all oil and gas projects are insignificant, as each represents only a small fraction of a much larger cumulative total, whether measured by production or emissions. Framing a project's production only as a fraction of global total production is a meaningless exercise in the absence of a cumulative assessment of the existing global production and emissions to which it adds. This type of 'drop in the ocean' argument has been rejected by courts around the world,[5] and by the Government's Supplementary Guidance.

Missing cumulative assessment by ignoring existing and approved projects

9. The Further Information fails to comply with the EIA Regulations and the Supplementary Guidance in evaluating cumulative effects. Paragraph 4 of Schedule 6 to the EIA Regulations requires:

> "*An assessment of the likely significant effects of the project on the environment, including those resulting from—*
> *(a) …*
> *(e) the* ***cumulation*** *of effects with* ***other existing or approved projects****, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources*".[6]

10. The Supplementary Guidance emphasises this legal requirement for an assessment of cumulative effects. It is definitive in confirming that "*[g]iven the global effect of GHG emissions, the ES [Environmental Statement]* ***must consider*** *the cumulative effects of the proposed project with other existing and planned future projects, in a global context*" (emphasis added).[7] It is not explicit on the methodology for doing so.

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[4] Department for Energy Security & Net Zero (DESNZ) (2025). *Supplementary Guidance for Assessing the Effects of Downstream Scope 3 Emissions on Climate from Offshore Oils and Gas Projects*, p.12.

[5] *Gloucester Resources Limited v Minister for Planning* [2019], NSWLEC 7, para. 515.
Saskatchewan v Attorney General of Canada [2021], re Greenhouse Gas Pollution Pricing Act SCC 11.
Milieudefensie v Royal Dutch Shell [2021], C/09/571932, para. 4.3.5
Milieudefensie v Royal Dutch Shell (Appeal) [2024], 200.302.332/01, para. 7.106
Urgenda Foundation v State of the Netherlands [2019], 19/00125, para. 5.7.7.

[6] Offshore Oil and Gas Exploration, Production, Unloading and Storage, Environmental Impact Assessment Regulations 2020 (SI 2020/1497) (**EIA Regulations**).
DESNZ, above note 4, p.11.

[7] DESNZ, above note 4, p.12, sec 3.1.

11. However, the approach in the Further Information has failed to lawfully consider the cumulative effects of the Rosebank Project because its approach has excluded existing and committed production from operating or in-development fossil fuel projects. It fails to distinguish between total oil and gas production in modelled scenarios and the portion of that production that originates from existing or approved projects, as opposed to new developments. As a result, the analysis fails to situate the Rosebank Project's scope 3 emissions within a cumulative global context.

12. IAMs represent oil and gas supply crudely. They typically do not model fossil fuel extraction at the project level, nor do they capture the pipeline of approved or existing developments. Consequently, IAMs do not reflect project life-cycle stages or operational details. Rather, IAMs are built around a set of energy service demands, such as heating, transportation, and industrial activity, which are determined by societal needs linked to key macroeconomic drivers, including Gross Domestic Product (**GDP**) and population. These models then determine the most cost-effective mix of energy sources to meet that demand, selecting from supply options that include oil, gas, renewable energy sources, and other technologies.

13. The volume of primary fuels extracted in any given scenario is, therefore, determined by the model's optimisation process, subject to a range of constraints and assumptions, including:

    - The size of each energy service demand;
    - Emissions limits consistent with the temperature target being modelled (e.g., 1.5°C or 2°C pathways and any permitted overshoot);
        - More ambitious carbon dioxide removal (**CDR**) assumptions (e.g., afforestation, or bioenergy or direct air capture combined with carbon capture and storage (**CCS**)) allow IAMs to model higher fossil fuel supply, particularly in the near and medium term, because removals compensate emissions later in the century.
    - The relative cost of different energy supply chains to meet each energy service demand (e.g., cost of oil to power combustion engine cars vs renewables to power electric vehicles (**EVs**));
    - Supply-side limitations*, e.g., limits on the maximum amount of oil and gas extraction at the aggregate country or region level;
    - Trade constraints (e.g., liquefied natural gas (**LNG**) export/import capacity); and
    - End-use technology constraints (e.g., the rate of EV deployment).

14. In broad terms, the level of oil and gas demand projected in an IAM scenario reflects the outcome of these 'levers' rather than a pre-determined allocation of production. These models are not designed to disaggregate production by field, nor do they

* Note IAMs typically do not model fossil extraction at the project level and, therefore, do not represent project life-cycle state or details of their operation.

represent existing, or the pipeline, of approved projects. That is, they typically do not model the life-cycle stage of fossil fuel projects. This simplistic approach means that IAMs are not inherently cumulative in a manner that is relevant to the assessment of the significance of the Rosebank Project and so fail to address cumulative impacts.

15. The simplistic approach also limits the value of IAMs in assessing significance and demonstrates that Equinor UK Limited has made inappropriate use of them to determine significance in the case of the Rosebank Project. The "field vs global comparison" renders significance impossible to determine: under this approach, it is unclear what level of emissions from a single field would be considered misaligned with global production. If every new field adopted the same methodology, each would appear individually 'insignificant', even as their combined output could far exceed levels compatible with climate-safe pathways, driving systemic overproduction and undermining net-zero objectives. The further information, therefore, fails to provide a robust or lawful evaluation of the project's overall climate impact. This approach neither aligns with the Supplementary Guidance, nor with best practice in cumulative emissions analysis.

16. A scientifically and legally robust approach to determining cumulative effects using pathways, and in turn, significance, would overlay existing and committed production from current and in-development fossil fuel projects onto the supply projected in the climate-pathway models (Figure 1). This would involve establishing a baseline of projected emissions from existing fields worldwide, with explicit assumptions about whether, how, and why any projects would produce less than their full reserves. This baseline should then be subtracted from emissions in a Paris-aligned pathway to determine the remaining 'emissions space' available for new projects. The project's production (emissions) would then be evaluated as an incremental addition to this existing and committed supply.

17. This cumulative approach, consistent with methodologies adopted in the IEA World Energy Outlook (**WEO**) scenario analyses,[8] International Institute for Sustainable Development (**IISD**) report on navigating energy transitions,[9] and University College London (**UCL**) report on climate implications of new oil and gas fields in the UK,[10] and peer-reviewed literature on establishing an accurate baseline,[11] would enable a meaningful assessment of whether the addition of the Rosebank Project's production is compatible with Paris-aligned pathways.

[8] International Energy Agency (IEA) (2025), *World Energy Outlook 2025*.
[9] International Institute for Sustainable Development (IISD) (2022). *Navigating Energy Transitions: Mapping the road to 1.5°C*.
[10] Muttitt G, Green F and Pye S (2025). *The Climate Implications of New Oil and Gas Fields in the UK - An Overview of the Evidence*. UCL Policy Lab, UCL Energy Institute & UCL Department of Political Science.
[11] Bustamante ML *et al*, (2024) *The climate test: a tool to evaluate alignment of energy infrastructure decisions with climate goals*. Climate Policy 25(5): 617-632.

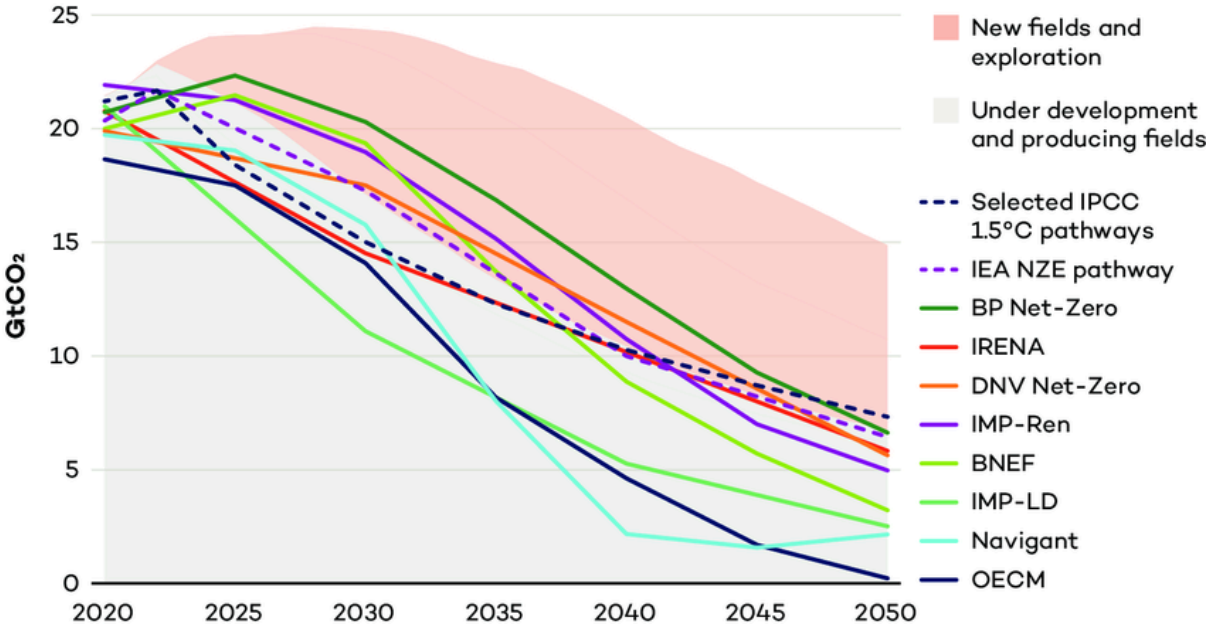

Figure 1: Projected global oil and gas production from existing (shaded grey) versus new (shaded pink) fields, compared to oil and gas consumption in 1.5°C scenarios. Source: IISD Navigating energy transitions 2022.

18. Consequently, the use of modelled global production volumes as the denominator in the analysis of the Further Information is methodologically inappropriate and it fails to produce a valid or cumulative assessment of significance.

19. Accordingly, OPRED should require Equinor UK Limited to undertake a cumulative, 1.5°C consistent assessment of scope 3 emissions that situates the Rosebank Project within the broader context of existing and approved global fossil fuel production. Global fossil fuel production data is available from providers such as Wood Mackenzie, Rystad, and IHS Markit. Peer-reviewed, credible estimates of committed emissions from fossil fuel production have also been published and are available.[12]

20. Only a cumulative approach can provide a meaningful assessment of the project's compatibility with the UK's obligations under the Paris Agreement. The scientific evidence outlined above clearly demonstrates that there is no remaining allowance for new oil and gas projects within Paris-aligned pathways. Therefore, a credible, cumulative assessment of the Rosebank's Project's scope 3 emissions would conclude that there is no remaining allowance for the Rosebank Project within Paris-aligned pathways, and, therefore, the project is not compatible with the UK's obligations under the Paris Agreement.

[12] Trout K *et al* (2022). *Existing fossil fuel extraction would warm the world beyond 1.5°C*. *Environ. Res. Lett.* 17: 064010.
Oil Change International (2023). *Sky's Limit Data Update: Shut Down 60% of Existing Fossil Fuel Extraction to Keep 1.5°C in Reach*.

Failure to consider global GHGs in baseline assessment

21. The Further Information fails to consider global GHGs in the baseline assessment. According to the Supplementary Guidance, "*[a] reasonable future estimate of global GHGs affecting climate over the lifetime of a project needs to be considered as part of the baseline scenario (…) Therefore, the scope 3 emissions estimated to be produced by the project (…) should be evaluated in the context of a global baseline scenario of GHGs*".[13]

22. The Further Information's consideration of future GHG emissions describes various scenarios for future GHG emissions, but does not treat these as a baseline.[14] A baseline, however, is "*a reference point against which the impact of a new project can be compared*",[15] making it an essential component of the impact assessment as it allows the project's impact to be measured as the difference between the state of the environment with, and without, the project. This is underlined by the Supplementary Guidance's requirement to present the scope 3 emissions from a new project against "*a no-project ("do-nothing") scenario*".[16]

23. In the Further Information, the presented scenarios do not consider the world without the Rosebank Project and they offer no means to compare how the environment changes with the addition of the Rosebank Project. The Further Information even states that "*[f]or the Assessment, a 'do-nothing' scenario (e.g., a scenario where the Rosebank Development does not proceed) would result in zero emissions*".[17] However, this is clearly incorrect as a world without the Rosebank Project (the baseline) is not one with zero emissions.

Use of some inadequate model pathways

24. Not only does the Further Information use energy/emissions pathways wrongly in generating global figures for comparison (see above at paragraphs 4 to 8), many of the pathways in its assessment of significance **are not constrained by a 1.5°C temperature goal**, despite a 1.5°C threshold being the agreed primary temperature goal for limiting the global average temperature increase under the Paris Agreement.[18]

    a. The Further Information includes pathways with temperature targets of 2°C, 2.5°C, 3°C, and 4°C in Table 13 (warming categories C3 to C8); 3°C (SSP2-4.5) and 4°C (SSP3-7.0) in Table 15; and 2°C (The Production Gap report) in Table 16, 2.4°C (IEA STEPS) and 1.7 °C (IEA APS)[19] in Table 17.

[13] DESNZ, above note 4, p.9.
[14] Equinor, above note 1, para. 3.3.
[15] Institute of Environmental Management & Assessment (IEMA) (2022). *Assessing greenhouse gas emissions and evaluating their significance*, 2nd edn, p.17.
[16] DESNZ, above note 4, p.9.
[17] Equinor, above note 1, p.14, fn 4.
[18] International Court of Justice (ICJ) (2025). *Advisory Opinion: On the Obligations of States in respect of Climate Change*, ICJ Case No. 187, para. 224.
[19] IEA (2024), *World Energy Outlook 2024*, p.232, fig. 5.26.

b. The inclusion of pathways above 1.5°C is irrelevant for the purpose of assessing Paris-aligned significance, given 1.5°C is the primary temperature goal under the Paris Agreement. Additionally, pathways with a 2°C temperature target cannot be considered consistent with the Paris Agreement's secondary temperature goal of **well below** 2°C. This is especially the case given that developed nations are expected to demonstrate higher ambition, in accordance with the principle of "*reflecting [their] common but differentiated responsibilities and respective capabilities, in the light of different national circumstances*".[20]

25. Pathways that minimise overshoot should be preferred. Pathways with high levels of overshoot can be considered incompatible with the precautionary principle, which is a fundamental principle that "*underlies the EIA Directive*".[21] As a general principle of European Union (**EU**) law, and the principle on which EU policy on the environment is based, the precautionary principle, therefore, applies where legislation is derived from EU law, as is the case for the EIA Regulations. The precautionary principle has also been adopted and applied by the UK courts.[22] A substantial body of scientific literature highlights the dangers and risks associated with high-overshoot scenarios,[23] including uncertainty regarding the sustainability, scalability, and economic feasibility of negative emissions technologies required to achieve subsequent CO_2 drawdown.[24]

a. DESNZ's own commissioned report on the global consequences of climate overshoot pathways highlights that "*overshooting 1.5°C would have a negative global economic impact*" and discusses how a 1.5°C scenario permitting overshoot carries greater risks than a 1.5°C scenario with no overshoot.[25]

b. The consequences are "*[i]n an overshoot, floods, droughts and extreme weather events would become stronger (…) Biodiversity losses would more than double to very high levels (…) The risk of fire would increase substantially*" and "*[t]he risk of triggering climatic tipping points with deleterious global consequences would be higher*".[26]

c. The report also highlights that "*[e]ven warming of 1.5°C would have negative impacts. Overshooting 1.5°C would worsen the impacts*", and concludes that

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[20] United Nations Climate Change Committee (UNCCC) (2015). *The Paris Agreement*.

[21] *R (on the application of Champion) (Appellant) v North Norfolk District Council and another (Respondents)* [2015] UKSC 52, 1 WLR 3710, para. 51.

[22] *R (Kenyon) v SSHCLG* [2020] EWCA Civ 302, para. 66.
Also see *R (Preston) v Cumbria County Council* [2019] EWHC 1362 (Admin).

[23] Schleussner C *et al.* (2024). Overconfidence in climate overshoot. *Nature* 634: 366-373.
Reisinger A *et al*. (2025). Overshoot: A conceptual Review of Exceeding and Returning to Global Warming of 1.5C. *Annu. Rev. Environ. Resour.* 50: 185-217.
IPCC (2023). Climate Change 2023: Synthesis Report.
DESNZ (2024). *Global consequences of climate overshoot pathways: Final report*.

[24] Buure K (2025). The eternal promise of carbon capture, utilisation and storage: Is there a business case? *ERSS* 127: 104308.
Fuhrman J *et al*. (2020). Food–energy–water implications of negative emissions technologies in a +1.5 °C future. *Nature* 10: 920-927.

[25] DESNZ, above note 23.

[26] DESNZ, above note 23, pp. 3, 44.

"*[i]mpacts can be minimised by keeping the global temperature as low as possible*".[27]

26. Accordingly, the SoS's decision should prioritise pathways aligned with 1.5°C and with limited, or no, overshoot. This is necessary to ensure the assessment is scientifically robust, consistent with the Paris Agreement and the precautionary principle, and, critically, keeps 1.5°C within reach.

Misleading engagement with scientific evidence

27. The Further Information makes misleading use of scientific evidence by selectively relying on evidence that supports the developer's arguments while ignoring contradictory evidence which is critical for a complete understanding of the facts. This cherry-picking approach is at odds with the Supplementary Guidance, which states that "*the content and context in the ES (…) should be comprehensive, to aid the decision maker in reaching a conclusion on the significant effects of the project on the environment and a decision as to whether to agree to the grant of consent*".[28] It further hinders the SoS in reaching an informed conclusion on the significant effects of the project on the environment, for which the EIA Regulations require the SoS to take *inter alia* the environmental statement and Further Information into account.[29]

28. In outlining the current environmental baseline in section 3.2, the Further Information omits the clear reality of the extremely limited remaining global carbon budget. The Further Information cites work from Forster *et al*,[30] in particular that total global CO_2 emissions were 41.1 GtCO2 (+/- 5.5 GtCO2) in 2023 and that "*from the beginning of 2025, the remaining carbon budget to maintain warming levels to below 1.5°C with >50% probability is 130 GtCO2eq*".[31] However, it does not actually engage with these two statements to inform its assessment. These statements demonstrate that the remaining carbon budget to maintain warming levels to below 1.5°C will likely be used up before the end of 2028, which the Rosebank Environmental Statement (**Rosebank ES**) states would be the Rosebank Project's first full year of production. Consequently, the Rosebank Project's total emissions of 254 MtCO2eq would have a significant impact on the climate, pushing warming levels even further beyond 1.5°C.

29. The Further Information also misleadingly omits key scientific evidence in the assessment of significance (section 6.4).[32] While the Further Information correctly states that the Production Gap report analyses the discrepancy between governments' planned fossil fuel production and production levels consistent with

[27] DESNZ, above note 23.
[28] DESNZ, above note 4, p.11.
[29] EIA regulations, above note 6, sec. 14, paras 1 (a,b), 2.
[30] Equinor, above note 1, para. 3.2.
Forster P *et al* (2025). *Indicators of Global Climate Change 2024: annual update of key indicators of the state of the climate system and human influence*. *Earth System Science Data* 17(6): 2641-2680.
[31] Equinor, above note 1, paras 3.2.4, 3.2.12, referring to Forster *et al*. (as above note 30).
[32] Equinor, above note 1, from p.45.

limiting warming to 1.5°C or 2°C, including the UK,[33] it fails to mention the key findings of both the 2023 and 2025 reports. These include *inter alia*:

a. that *"[g]overnments, in aggregate, still plan to produce far more fossil fuels than would be consistent with achieving the goals of the Paris Agreement"*;

b. that, *"[c]ountries are now collectively planning even more fossil fuel production than two years ago, with projected 2030 production exceeding levels consistent with limiting warming to 1.5°C by more than 120% (…) and 77% above the median 2°C*";

c. that, *"[t]hese plans undermine countries' Paris Agreement commitments, and go against expectations that under current policies global demand for coal, oil, and gas will peak before 2030"*; and

d. that, *"[r]eaching net zero greenhouse gas emissions in the second half of the century, as the Paris Agreement calls for, will require cutting fossil fuel production and use to the very lowest levels possible"*.[34]

30. To credibly engage with the Production Gap report, the Further Information must acknowledge global governments' planned fossil fuel production and global production levels consistent with limiting global warming to 1.5°C or 2°C. However, it only compares the individual Rosebank Project to the global production levels consistent with 1.5°C or 2°C of warming and entirely omits consideration of planned fossil fuel production. This omits the most important and relevant part of the Production Gap reports' findings, with a misleading comparison to global totals and an omission of cumulative production (see above at paragraphs 4-8). If the Further Information had engaged correctly with the report, this would have demonstrated the reality that approving any new oil and gas field, including the Rosebank Project, would be inconsistent with achieving the goals of the Paris Agreement (see above at paragraph 20).

31. Therefore, it could not have reached the conclusion that the Rosebank Project's scope 3 emissions would not have a significant effect on climate based on the fact that "*Parties to the Paris Agreement have committed to achieving the overarching goal to "hold the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels*".[35] The Production Gap report is clear that governments' planned fossil fuel production undermines their commitments to the Paris Agreement. In fact, the report states that achieving the Paris Agreement goals will require governments "*cutting fossil fuel production and use to the very lowest levels possible*", which is in stark contrast with the claims made in the Further Information.

[33] Equinor, above note 1, para 6.4.7.
[34] SEI, CA, and IISD (2025). *The Production Gap Executive Summary, 2025 report.*
SEI, CA, and IISD (2023). *The Production Gap Executive Summary, 2023 report.*
[35] Equinor, above note 1, paras 6.5.3 and 6.5.4.

Nowhere does the Further Information consider how opening Rosebank could be consistent with this.

32. Another case of the Further Information omitting scientific evidence is Equinor's assessment of sector-specific net zero strategies and reduction trajectories (**SSS-NZ**), in particular the IEA's NZE Scenario.[36] The Further Information mentions the NZE Scenario, but fails to mention that under this scenario, there is no need for investment in new fossil fuel supply.[37] In fact, "*[b]eyond projects already committed as of 2021, there are no new oil and gas fields approved for development in our pathway, and no new coal mines or mine extension are required*".[38] In its 2023 update, the IEA confirms the previous finding, stating that "*[n]o new long-lead time upstream oil and gas projects are needed in the NZE scenario, neither are new coal mines, mine extensions or new unabated coal plants*".[39] That there is still no room for new oil, gas, and coal expansion or investment beyond existing fields under the NZE Scenario has been re-affirmed in the IEA's WEO, published in November 2025.[40]

33. Similarly, the Further Information fails to mention that under a net zero by 2050 scenario with a pathway to limiting the global temperature rise to 1.5°C, the IEA estimates that the demand for oil and gas is set to decline by at least 25% by 2030 and 80% by 2050.[41] Consequently, "*the pace of decline in oil and gas demand in the 2030s may also mean that a number of high cost projects come to an end before they reach the end of their technical lifetimes*".[42] However, as explained by Green *et al*, it is particularly difficult to close existing fields for economic and political reasons related to jobs, vested interests, infrastructure lock-in effects, and legal reasons related to costly compensation.[43] For these reasons, it is more pragmatic and effective to prevent new fossil fuel projects than to attempt to close existing capacity early.

34. Putting this scientific evidence in context with the Rosebank Project, under the NZE Scenario, the Rosebank Project is neither needed, nor should it be granted development consent.

Inclusion of, and reliance on, irrelevant information

35. The Further Information includes, and relies on, **irrelevant information** in several sections, which obfuscates the relevant information on which the SoS's decision must be based. According to the EIA Regulations, the environmental statement must contain "*the information listed in Schedule 6, **as relevant***" (emphasis added).[44] As the

[36] Equinor, above note 1, from para. 6.4.13.
IEA (2021). *Net Zero by 2050: A Roadmap for the Global Energy Sector*.
IEA (2023). *Net Zero Roadmap: A Global Pathway to Keep the 1.5°C Goal in Reach* [2024 revised edition].
[37] IEA (2021), above note 36, p.21.
[38] IEA (2021), above note 36, p.21.
[39] IEA (2023), above note 36, p.16.
[40] IEA, above note 8.
[41] IEA (2023), above note 36, p.16.
[42] IEA (2023), above note 36, p.76.
[43] Green F *et al* (2024). No new fossil fuel projects: The norm we need. *Science* 384(6699): 954-957.
[44] EIA Regulations, as above note 6, sec. 8 and schedule 6.

EIA Regulations do not refer to the concept of different emissions (scope 1, 2 and 3), the Supplementary Guidance sets out the expectations on the content required in an ES for assessing effects of scope 3 emissions.[45]

36. Firstly, the Further Information includes a range of instruments as purported environmental protection objectives when they are not. The EIA Regulations state that "*environmental protection objectives established in retained EU law or at national level*" must be taken into account when assessing the significance of the likely effects of the project on the environment.[46] According to the Supplementary Guidance, the "*[e]nvironmental effects from scope 3 emissions from downstream activities largely relate to the impacts on climate from the release of GHGs*".[47] For this reason, "***[g]lobal GHG emissions*** *are a relevant consideration to assessing scope 3 emissions and in understanding "the impact of the project on climate", as required under Schedule 6 of the EIA Regulations*", and not territorial emissions (emphasis added).[48] In this context, the Supplementary Guidance also refers to the United Nations Framework Convention on Climate Change (**UNFCCC**), in particular the long-term temperature goal of the Paris Agreement.[49]

    a. The Further Information summarises environmental protection objectives in Table 5, stating that these are "*relevant to the consideration of the Rosebank Development's Downstream Scope 3 Emissions*".[50] However, against the background of the EIA Regulations and the Supplementary Guidance, the following legislative and policy instruments named in Table 5 are not environmental protection objectives:

Instrument named in Table 5	Reason for irrelevance
UK Carbon Budget	As stated in the Supplementary Guidance, the UK Carbon Budget under the The Climate Change Act (**CCA**) 2008 (as amended) is based on territorial emissions and as such is legally irrelevant for the assessment of scope 3 emissions.[51]
UK Carbon Budget Delivery Plan (DESNZ, 2023)	The UK Carbon Budget Delivery Plan, now the Carbon Budget and Growth Delivery Plan (**CBGDP**) (DESNZ, 2025), sets out how the Government meets its

[45] DESNZ, above note 4, pp.6, 7.
[46] EIA Regulations, as above note 6, schedule 6(5)(d).
[47] DESNZ, above note 4, p.8.
[48] DESNZ, above note 4, p.8.
[49] DESNZ, above note 4, p.8.
[50] Equinor, above note 1, para. 4.3.1, table 5.
[51] Equinor, above note 1, pp. 6, 8.

	statutory carbon budgets. As set out above, these are based on territorial emissions and as such are legally irrelevant for the assessment of scope 3 emissions.
Clean Power 2030 Action Plan (UK Government, 2024)	The Clean Power 2030 Action Plan focuses on a pathway to a clean power system and does not establish any environmental protection objectives for the assessment of scope 3 emissions.
Climate Change Committee (**CCC**) 2025 report to Parliament	As set out in Section 36 of the CCA, the CCC's annual report to Parliament focuses on the UK's progress towards meeting the carbon budgets and the target for 2050. As set out above, these are based on territorial emissions and as such are not relevant for the assessment of scope 3 emissions.
Balanced Pathway scenario	The Balanced Pathway scenario is a roadmap guiding the UK's Seventh Carbon Budget, which is based on territorial emissions and as such not relevant for the assessment of scope 3 emissions.
UK Nationally Determined Contribution (**NDC**) (2025)	The UK's NDC focuses on scope 1 and 2 emissions, which means that it does not establish any environmental protection objectives for the assessment of scope 3 emissions.
Independent Review of Net Zero (Mission Zero, 2023)	The Independent Review of Net Zero is a report focusing on the UK's net zero approach and does not establish any environmental protection objectives for the assessment of scope 3 emissions.
Net Zero Strategy: Build Back Greener	The Net Zero Strategy: Build Back Greener was adopted under the Johnson Government and ruled

	unlawful in 2022.[52]
Powering Up Britain, The Net Zero Growth Plan (2023)	Powering Up Britain, The Net Zero Growth Plan was adopted under the Sunak Government, and has been superseded by plans under the current Labour Government.
British Energy Security Strategy (2022)	The British Energy Security Strategy was adopted under the Johnson Government and has been superseded by plans under the current Labour Government.
North Sea Transition Deal (**NSTD**, 2021)	The NSTD is a sectoral deal between the Government and the offshore oil and gas industry and does not establish any environmental protection objectives for the assessment of scope 3 emissions.
Scottish National Marine Plan (2015)	The Scottish National Marine Plan covers the management of both Scottish inshore waters and offshore waters and does not establish any environmental protection objectives for the assessment of scope 3 emissions. In addition, an updated version (plan 2) was open for public consultation this year, meaning that the 2015 version is soon outdated.

b. Based on this assessment, the majority of the seventeen instruments that the Further Information cites do not constitute environmental protection objectives and are also legally irrelevant for the purposes of a scope 3 emissions assessment. Those named in Table 5 that are relevant to the consideration of the Rosebank Project's scope 3 emissions include the UNFCCC, the Paris Agreement, recent Conference of the Parties (**COP**), and the Glasgow Climate Pact.[53] The CCA is relevant for environmental protection objectives only insofar as it brings the broader goals of the Paris Agreement into consideration on scope 3 emissions. However, as the Supplementary Guidance clarifies, the CCA gives effect to the

[52] *Friends of the Earth Limited, ClientEarth, Good Law Project and Joanna Wheatley v Secretary of State for Business, Energy and Industrial Strategy* [2022] EWHC 1841.
[53] Equinor, above note 1, table 5.

reduction of territorial GHG emissions, and the considerations of the CCA should, therefore, be included for the assessment of scope 1 and 2 emissions.[54]

37. By including so much irrelevant information on environmental protection objectives, the Further Information creates a confusing picture of the policy landscape that guides the assessment of scope 3 emissions and obfuscates the relevant information on which the SoS's decision must be based.

38. Secondly, the Further Information includes a variety of irrelevant information regarding the significance assessment of the Rosebank Project's scope 3 emissions. As set out above, this ranges from the misleading comparison to global totals (paragraphs 4-8) to the use of some inadequate model pathways (paragraphs 24-26).

39. In addition, the significance assessment includes irrelevant information regarding UK territorial energy policy, strategy, and demand projections, specifically referencing the CCC's Balanced Pathway. The Further Information sets out that "*[t]he CB7 demand projection indicates that UK demand for oil and gas will continue to exceed UKCS oil and gas production in this decarbonisation pathway (Figure 7)*".[55] It subsequently concludes that "*UK Gov-CPS - The Rosebank Development is included within the UKCS gross gas and oil production trajectories compared with future demand under CB7 as set out in Figure 7. The consequence is therefore assessed to be low*".[56]

40. However, the CCC has highlighted that "*[e]xpansion of fossil fuel production is not in line with Net Zero*".[57] The CCC acknowledges that "*[t]he UK will continue to need some oil and gas until it reaches Net Zero, but this does not in itself justify the development of new North Sea fields*". More recently, the CCC stated that "*continued reliance on fossil fuels undermines UK energy security*".[58]

41. Given that oil and gas are traded internationally (and regionally in the case of pipeline gas), balancing demand and supply should be assessed at the global or regional level, not within domestic territorial boundaries.[59] The reliance on UK-specific demand projections in the Further Information to justify new extraction, therefore, lacks relevance to the proper assessment of global cumulative emissions.

42. Finally, the significance assessment argues that in a scenario where Parties to the Paris Agreement fail to meet the temperature goals, "*the emissions from any project, including the Rosebank Development, could have a significant effect on climate. This is because, all emissions in that scenario will have a significant effect due to the sensitivity of the climate as a receptor and the cumulative effect of continuing unabated emissions*".[60] The further information then moves on to say that it must be recognised, however, that Parties to the Paris Agreement have committed to

[54] DESNZ, above note 4, p.8.
[55] Equinor, above note 1, para. 6.4.22.
[56] Equinor, above note 1, para. 6.5.6.3.
[57] Climate Change Committee (CCC) (2023). *Progress in reducing emissions: 2023 report to Parliament*.
[58] CCC (2025). *Progress in reducing emissions: 2025 report to Parliament*.
[59] Muttitt G *et al*, as above note 10.
[60] Equinor, as above note 1, para. 6.5.3.

achieving the temperature goals, concluding that the Rosebank Project does not have a significant impact on climate.[61]

43. This reasoning would mean that as long as States are committed to achieving the Paris Agreement's temperature goals, oil and gas projects such as the Rosebank Project would have no significant effect on climate. While this assumption is not only factually and scientifically wrong, it is also irrelevant for assessing the significance of scope 3 emissions.

Emissions not used in the assessment of significance

44. The Further Information fails to comply with the Supplementary Guidance's requirement that *"ESs will consider how the GHG* ***emissions*** *associated with a proposed project impact climate"* (emphasis added). The assessment in the Further Information compares production volumes with modelled supply and demand, rather than evaluating scope 3 emissions. While production volumes typically correlate with emissions,[62] the purpose of the assessment is to evaluate the significance of scope 3 emissions.

45. The Further Information has followed the Supplementary Guidance in correctly assuming that all production should be considered to be combusted in their calculation of scope 3 emissions.[63] However, the conclusion drawn from the assessment of significance (sections 6.5.6.1 - 6.5.6.3) is entirely based on the Rosebank Project's production profile rather than its emissions profile. Using production volumes instead of emissions to assess significance is methodologically flawed.

46. The Further Information use of production volumes risks underestimating the comparison of Rosebank's emissions to the models' demand/supply (even though this approach is flawed to begin with). This is because models project an increasing share of non-combustion uses of oil and gas, such as for petrochemicals.[64] As a result, not all oil supply/demand accounted for in these projections, especially in the latter half of the century, is consumed through combustion. This point is emphasised in the Further Information in section 6.4.17, which mentions that "*Table 17 shows that there is ongoing demand for oil and gas in all scenarios. Three-quarters of oil demand in a NZE scenario is used in sectors where the oil is not combusted, including as a petrochemical feedstock, and in products such as paraffin waxes, asphalt and bitumen*".

47. Oil and gas demand in IAM models, particularly in 1.5°C aligned scenarios, does not

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[61] Equinor, as above note 1, para 6.5.4.

[62] IEA (2018). *World Energy Outlook 2018: "downstream emissions from burning fossil fuels are the major source of emissions from oil and gas, accounting for roughly* ***70 to 90 per cent of lifecycle emissions from oil products and 60 to 85 per cent of those from natural gas****"*.

[63] *R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents)* [2024] UKSC 20.

[64] Roland G, Jambeck JR, and Law, KL (2017). *Production, use, and fate of all plastics ever made*. *Sci. Adv.* 3(7): e1700782.

equate to emissions from the supply of oil and gas, as some oil is used for non-combustion purposes such as plastics. Although the field vs global comparison is flawed (see above paragraphs 4 to 23), the use of production volumes introduces an additional layer of methodological inaccuracy, as a portion of the global supply/demand pertains to non-combustible uses. This approach can overstate the amount of supply/demand that is considered combustible, thereby affecting the assessments of associated emissions.

48. It is, therefore, critical that **scope 3 emissions,** rather than production volumes, form the basis for significance assessment in accordance with the Supplementary Guidance, establishing the appropriate precedent for future evaluations.

UK obligations under international law

49. As set out above, the Further Information has cherry-picked and omitted scientific evidence on climate impacts, relying on irrelevant information in assessing the likely and significant effects of the Rosebank Project. The approach is scientifically dubious and approving the project would not align with the UK's obligations under international law.

50. Furthermore, other than in relation to the climate, the Further Information does not investigate or in any way assess the indirect effects of GHG emissions on the factors identified in paragraph 5 of Schedule 6 to the EIA Regulations (i.e. population, human health, land, water, biodiversity (with particular emphasis on protected species and habitats), cultural heritage etc.) both in the UK and/or globally.[65]

51. The International Court of Justice (**ICJ**) has set out definitively States' obligations under the climate change treaties and other environmental treaties, as well as customary international law and international human rights law, emphasising a strong interrelation between these obligations.[66]

52. The Court recognised the severe and far-reaching consequences of climate change, including extreme weather events, irreversible loss of biodiversity and human life and health, noting the "*urgent and existential threat posed by climate change*".[67] It makes clear that under customary international law, States have a duty to act **with due diligence** and to **use all means at their disposal** to prevent activities carried out within their jurisdiction or control from causing significant harm to the climate system and other parts of the environment.[68]

53. The standard to which already industrialised nations are held is stringent,[69] given their historic contributions to cumulative GHG emissions and the aforementioned principle

[65] EIA Regulations, above note 6.
Also see: Borgarting Court of Appeal, Oslo, Case 24-036810ASD-BORG/02, 14th November 2025, para. 6.1.
[66] ICJ, above note 18.
[67] ICJ, above note 18, para. 73.
[68] ICJ, above note 18, p.131, para. B(a).
[69] ICJ, above note 18, para. 138.

of common, but differentiated, responsibilities and respective capabilities (**CBDR-RC**).[70] These elements include States taking, to the best of their ability, **precautionary measures which take account of scientific and technological information**, as well as relevant rules and international standards.[71]

54. As such, a State will be in breach of its international obligations if it fails to exercise due diligence to limit the quantity of emissions caused by private actors under its jurisdiction.[72] This includes regulatory action to protect the climate system from GHG emissions through fossil fuel production, fossil fuel consumption, the granting of fossil fuel exploration licences or the provision of fossil fuel subsidies.[73] Breaching obligations to protect the climate system from GHG emissions means that a State can face "*the entire panoply of legal consequences*".[74]

55. Noting the ICJ's July ruling, the European Court of Human Rights (**ECtHR**) recently held that Article 8 of the European Convention on Human Rights (**ECHR**) requires Contracting States to subject decisions on the extraction of petroleum to **rigorous and comprehensive** environmental impact assessment. States decision-making in the context of environmental impact assessment must be conducted "*in good faith*" and be "***based on the best available science***" before the authorisation of a potentially dangerous activity that may be harmful to the right for individuals to effective protection by the State authorities from serious adverse effects of climate change on their life, health, well-being and quality of life.[75]

56. For petroleum production projects specifically, at the public authority level, there must be an assessment of whether the activity is compatible with States' obligations under national and international law to take effective measures against the adverse effects of climate change.[76]

57. The ECtHR sets out clear expectations that environmental assessment must include the cumulative GHG emissions from all projects combined, as a project by project assessment is prohibited under the EIA Directive 2011/92/EU (**EIA Directive**).[77] EIA must be based on **relevant, up-to-date and comprehensive information** and should assess the possible downstream effects of activities contributing to GHG emissions, based on the **best available science**.[78]

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[70] ICJ, above note 18, para. 137.
[71] ICJ, above note 18, para. 136.
[72] ICJ, above note 18, paras. 252, 428.
[73] ICJ, above note 18, para. 427.
[74] ICJ, above note 18, para. 445.
[75] *Greenpeace Nordic and Others v Norway* [2025] ECHR no. 34068/21, para. 318 (emphasis added).
[76] ECHR, above note 75, para. 319.
[77] ECHR, above note 75, para. 336.
[78] ECHR, above note 75, para. 324.

58. In its ruling, the ICJ noted that the "*best available science, as presented by the IPCC, confirms that cumulative GHG emissions are the primary source of risks arising from anthropogenic climate change*".[79]

59. The Court confirmed that the 1.5°C threshold is the "***scientifically based consensus target under the Paris Agreement***" (emphasis added).[80] A lack of recognition that the primary temperature target is 1.5°C runs throughout the Further Information (in particular its use of model pathways that are not constrained by a 1.5°C temperature goal, see above at paragraph 24).

60. The UK Government itself commits to acting in accordance with its international law obligations.[81] It "*must act in good faith to comply with the law and in a way that seeks to align the UK's domestic law and international obligations, and fulfil the international obligations binding on the UK*".[82] The principles set out by the ICJ in its ruling constitute environmental protection objectives that should be taken into account.

61. The SoS is, therefore, asked to confirm in his reasoned decision whether his decision in relation to the Rosebank Project aligns with the UK's obligations as set out in the ICJ ruling.

B. Significant effects not limited to downstream scope 3 emissions from the Rosebank Project

62. The Further Information fails to assess the effects of the Rosebank Project on the environment that are not limited to downstream scope 3 emissions, leading to an incorrect conclusion on the significance of these effects from the project.

Failure to properly assess the significance of the Rosebank Project's upstream emissions

63. The Further Information does not remedy the failure of the Rosebank ES to properly assess the significance of the upstream emissions from the project. The Further Information identifies no changes or updates altering the assessment in the Rosebank ES that the impact of non-scope 3 atmospheric emissions will be insignificant.[83] However, the Rosebank Project's upstream emissions are inconsistent with the UK net

[79] ICJ, above note 18, para. 137.
[80] ICJ, above note 18, para. 224: *"At the twenty-sixth COP, which was the third CMA to the Paris Agreement, parties "[r]ecognize[d] that the impacts of climate change will be much lower at the temperature increase of 1.5°C compared with 2°C and resolve[d] to pursue efforts to limit the temperature increase to 1.5°C (see decision 1/CMA.3, Glasgow Climate Pact, 13 November 2021, UN doc. FCCC/PA/CMA/2021/10/Add.1, p. 4, para. 21)"*.
[81] UK Government, Cabinet Office. *Ministerial Code*. Para. 1.6 states: "*The Ministerial Code should be read against the background of the overarching duty on ministers to comply with the law, including international law and treaty obligations, and to protect the integrity of public life (…)*".
[82] UK Attorney General's Office (2024). *Attorney General's Legal Risk Guidance*, para. 9.
[83] Equinor. *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* (**Further Information - Revised and updated assessment**), p.21.

zero target,[84] as well as with the UK carbon budgets and the NSTD.[85] Moreover, there is a failure to account for extensions to existing infrastructure and their associated emissions.[86]

64. This conclusion fails to account for relevant updates in UK Government policy (for example, the CBGDP) and the inadequacies of the original assessment in the ES. It is imperative that OPRED and the SoS are confident that the upstream GHG emissions from Rosebank would be compatible with the SoS's net zero obligation under the CCA.[87] Any vague assertions in the original ES and the Further Information of the Rosebank Project's compatibility with UK Government climate commitments and policies, or comments on what Equinor UK Limited *might* do, are insufficient to meet this obligation and would put the UK's net zero target at risk.

65. The assessment of upstream emissions in the ES employs the 'drop in the ocean' approach (the argument that any single oil and gas project is a 'drop in the ocean' of global emissions and would, therefore, make a negligible contribution to climate change), which is firmly rejected by the Supplementary Guidance.[88] To ensure a robust approach for the assessment of *all* emissions, including upstream emissions, the original assessment in the Rosebank ES should be updated to apply a cumulative approach to assessing upstream emissions and comparing the emissions to the limited remaining carbon budget.

Failure to commit to electrification

66. The failure to commit to electrifying the Rosebank Project's Floating, Production, Storage and Offloading vessel (**FPSO**) undermines the UK CBGDP for meeting the country's statutory carbon budgets, and hence poses a significant and unacceptable risk to the climate.

67. The Further Information is clear that Equinor UK Limited is seeking a field development consent without a commitment to electrify the Rosebank Project. The decision of the SoS needs to be made on this basis in line with the requirement to assess the worst case scenario.

    a. The Further Information mentions that the Rosebank Project *could* become an electrified project, but makes no guarantees that it will be electrified. It highlights that electrification would be dependent on technology being qualified and mature,

[84] For example, the reference in the Further Information to the potential for extending asset life through the development of nearby oil and gas opportunities indicates that production beyond 2050 is actively being considered.
[85] As laid out in the submission from Uplift and other organisations during the public consultation on the Rosebank Project in 2022.
[86] Above note 85.
[87] The materiality of whether a project aligns with the carbon budgets and the Net Zero obligation has already been recognised by OPRED in its 2021 Jackdaw decision, and there are no legal or factual reasons to justify a departure from that position in this case.
[88] DESNZ, above note 4, p.12.

and viability being confirmed.[89] The uncertainty around electrification was noted in the previous decision on the Rosebank Project, and remains unchanged.[90]

b. Industry behaviour illustrates the need to be cautious in relying on the electrification aspirations of companies. CNOOC, for example, recently dropped its North Sea electrification plans for the Buzzard field due to being "*unable to find an investible solution*".[91]

c. The CBGDP also acknowledged the delivery risks with electrification, including "*the high cost of infrastructure change, bottlenecks in network capacity and scheduling and a challenging investment climate*", highlighting that significant barriers remain to a project like Rosebank being electrified.

68. While electrification remains challenging, it has been given increasing importance in the Government's climate plans. The recent CBGDP has increased the assumed deployment of electrification of oil and gas installations compared to previous Carbon Budget Delivery Plans (**CBDPs**).[92] The CBGDP modelled proposals and policies includes the electrification of upstream production, noting industry emissions reduction commitments under the NSTD towards net zero by 2050.[93]

a. The sector is already off track to meet the CBGDP expectations for 2025 given no projects are currently electrified.[94] Even the highest ambition scenario of the NSTA would see first power in 2026 at the earliest.[95]

b. Further, the 2025 Emissions Monitoring Report shows lower emissions savings from electrification than the 2024 Emissions Monitoring Report relied on for the CBGDP, further indicating the sector is off track to meet CBGDP expectations.

c. The NSTA projects that the sector will not achieve net zero emissions in 2050 even in its most ambitious electrification scenario, and would only narrowly achieve the 2040 target of 90% emissions reduction in the upper end of the high-range scenario.[96]

d. The above highlights that the delivery of platform electrification upon which the CBGDP relies (and relies to an even greater degree than previous CBDPs) is already tenuous, and only when maximally deployed does the sector have a chance of aligning with the upstream emissions reduction pathway towards net zero by 2050,

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[89] Equinor. *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* (**Further Information - Other relevant information**), para. 5.3.

[90] DESNZ. *SoS decision to agree to or refuse to agree to the OGA granting of consent - Letter to the developer [Reg 14(5)] - 16/06/2023*.

[91] *Exclusive: CNOOC drops North Sea electrification plans putting flagship Green Volt floating wind scheme at risk*, *Energy Voice*, 28 August 2025.

[92] Gabbatiss J, Dunne D, Lempriere, M (2025). Q&A: The UK government's 'carbon budget delivery plan' for 2035, *Carbon Brief*, 31st October 2025.

[93] UK Government, HoC (2025). *Carbon Budget and Growth Delivery Plan* [HC1366], p.96.

[94] UK Gov, HoC, above note, p.203.

[95] North Sea Transition Authority (NSTA) (2025). *Emissions Monitoring Report 2025*.

[96] NSTA, above note 95.

and would need to be more ambitious than any existing NSTA scenario to achieve net zero emissions by 2050.

69. Introducing new, unelectrified projects like the Rosebank Project that would be in production beyond 2050 clearly poses a significant risk to the UK achieving its plan to meet net zero by 2050. The SoS should not approve any additional projects that are not electrified if they are to meet their net zero obligation under CCA. The strongest opportunity the Government has to influence whether the industry meets the CBGDP is at the project approval stage, where it is empowered to prevent the development of projects like Rosebank that would undermine CBGDP delivery.

Failure to properly assess the significance of the Rosebank Project's effects on the marine environment

70. The Further Information contains insufficient information to evaluate the conclusions that there is no change in impact significance. In particular, data from claimed additional surveys and assessments, as part of the Further Information on the revised and updated ES assessment, is absent.

71. The significant effects of the Rosebank Project on the marine environment are set out in the public consultation submission on the Rosebank Project from the Ocean Alliance Against Offshore Drilling, which Uplift has considered carefully and fully endorsed. In addition, the Further Information fails to properly assess the following effects:

72. The Joint Nature Conservation Council (**JNCC**) views the deep-sea sponge condition within the Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area (**MPA**) as "*unfavourable*" and advises a recovery objective.[97] Any impact on deep-sea sponge aggregations runs counter to this.

    a. The Rosebank ES's assessment focus between KP40 and KP50 is based on assumptions of sponge aggregation depth ranges contrary to that of JNCC's latest surveys and guidance (450-550m vs JNCC's 400-600m), resulting in a 50% smaller assessed depth band.[98] This undermines the updated ES and interpretation, for example, when referencing JNCC advice on page 14 without acknowledging the discrepancy between depth bands used.

    b. In addition, the Further Information only emphasises a small number of survey stations that had sponge aggregations, ignoring the potential for sponges to occur beyond (and be impacted) outside of the limited survey area. The Further Information estimates the impacted area of seabed resulting from the laying of the

[97] JNCC (2018). *Conservation objectives for Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area*.
JNCC (2020). *Statements on conservation benefits, condition and conservation measures for Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area*, p.5, Table 1.

[98] *Faroe-Shetland Sponge Belt MPA*, JNCC, 22nd May 2025.
JNCC (2018). *Supplementary Advice on Conservation Objectives for Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area*, p.9, 16, Table 1.

pipeline to be 0.37 km^2.[99] Beyond the mortality of all benthic organisms in the direct path of the pipeline, resultant sediment plumes and habitat changes (such as sediment size) can extend the spatial impacts to 10s-100s of metres with long-lasting adverse effects to sediment composition and deep-sea sponge populations through smothering, as evidenced in the Supplementary Advice on Conservation Objectives (**SACO**) for Faroe-Shetland Sponge Belt MPA.[100]

73. The Further Information correctly describes the project area as an important migration route and feeding area for cetacean species, several of which have significant International Union for Conservation of Nature (**IUCN**) red list conservation status (including critically endangered, endangered and vulnerable species). The 2025 Small Cetaceans in European Atlantic Waters and the North Sea (known as **SCANS**) surveys described in the Further Information found that densities of harbour porpoise and white-beaked dolphins increased from that previously reported by two- and six-fold, respectively. An increase in spatial density would be expected to increase the number of animals that could be in the project area at any given time, thereby increasing likelihood of exposure to, for example, noise impacts from seismic surveys, drilling and vessel thrusters.

74. The Rosebank ES does outline some anthropogenic noise impact mitigation measures relating to marine mammals, in particular the use of Passive Acoustic Monitoring (**PAM**) during hours of darkness and under conditions not conducive for visual surveys.[101] This is broadly in line with JNCC advice.[102] However, more effective mitigation measures could still be employed, such as ceasing operations during these periods - for example, regulations in the US prohibit seismic activity at night and in low visibility conditions with only PAM.[103]

75. The conclusion in the Further Information that there is an absence of coral gardens does not seem defensible and appears to be based on a mischaracterisation of guidance and definitions of a coral garden from the Convention for the Protection of the Marine Environment of the North-East Atlantic (**OSPAR**) Commission.[104] An OSPAR Habitat Definition document[105] and a Background Document for Coral Gardens[106] provide only a general characterisation, with threshold values for coral garden presence (including species composition and organism density) currently undetermined. The Further Information reassessed survey footage using Henry & Roberts (2014),[107] identifying several species that are listed in that criteria as potentially contributing to UK Coral Gardens - but were not included in the list of four

[99] Equinor, above note 83, p.19.
[100] JNCC (2018), above note 98, p.15, 33.
[101] Equinor, above note 83, p.315.
[102] JNCC (2023). *JNCC guidance for the use of Passive Acoustic Monitoring in UK waters for minimising the risk of injury to marine mammals from offshore activities.*
[103] US Code of Federal Regulations (2009). *Taking and Importing Marine Mammals; Taking Marine Mammals Incidental to the Port of Anchorage Marine Terminal Redevelopment Project, Anchorage, Alaska*.
[104] Equinor, above note 83, para. 4.3.2 and p.159.
[105] OSPAR. *OSPAR Commission Agreement 2008-7: Coral Gardens*.
[106] OSPAR (2010). *Biodiversity Series: Background Document for Coral Gardens*.
[107] 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.

coral garden taxa the updated ES used in determining coral garden presence (*Virgularia mirabilis*, a sea pen, on page 150; *Primnoa* and *Dendronephthya*, soft corals, on page 225). The updated ES's own multivariate analyses indicated the presence of sensitive, slow-growing soft coral species throughout much of the project area that would be significantly impacted by the installation of subsea infrastructure.[108]

C. Relevant information for the Secretary of State's decision-making on the Rosebank Project

76. The Further Information provides "*updated information*" for the SoS to consider when reaching a decision on whether or not to agree to the grant of consent for the Rosebank Project. These claims require further scrutiny and are in parts misleading.

Scrutiny needed of claims regarding jobs

77. The Further Information highlights the 2,000 jobs that the Rosebank Project will reportedly create, however, it is important to clarify the type of employment this figure refers to:

    a. it includes not just direct jobs working on the Rosebank Project, and indirect jobs in its supply chain, but also assumptions about the induced jobs the Rosebank Project would create;

    b. it includes jobs created outside of the UK; and

    c. it refers primarily to the short term construction phase in the peak of development, which does not represent long-term job opportunities.

78. While the Rosebank Project will create jobs, by employing a range of varied figures and referring to job creation units using "*man-years of full-time work*", it is unclear in the Further Information how many long-term direct, indirect, and induced jobs it will respectively create in the UK.[109]

Scrutiny needed on claims around local supply chain investment

79. While the Further Information makes claims about the Rosebank Project benefitting ports, fabrication facilities and using local content, Equinor UK Limited does not make any explicit commitments to investments in any of the above.[110]

80. Shetland's involvement in the Rosebank Project appears to have been largely confined to basic port logistics, with Lerwick Harbour used as a marshalling yard for project equipment. As such, the closest community to the development has seen limited opportunity to benefit from long term jobs, revenues or supply chain capacity

[108] Equinor, above note 83, p.152.
[109] Equinor, above note 89, para. 3.3.
[110] Equinor, above note 89, paras 3.5-3.10.

building. Equinor UK Limited's assertions about local supply chains benefiting from its investment should, therefore, be subject to close scrutiny.

Potential negative impact on UK tax revenues

81. The Further Information states that the UK Government stands to gain substantial tax revenues from the Rosebank Project which would be lost if it does not proceed.[111] However, this underplays the risk that the UK Government could make a substantial net tax loss on the profits from the field. Despite the Energy Profits Levy (**EPL**), generous tax breaks also mean the UK public in effect shoulders more than 80% of the costs of developing new fields.

82. According to analysis by Uplift and WWF Norway, the Rosebank Project could result in a net loss of over £250 million to the UK Treasury, while the field's owners would earn £1.5 billion in profit.[112] This is because Equinor UK Limited will make most of its investment while the generous tax reliefs that are part of the EPL are switched on, but it will generate most of its profit after 2030, when the EPL is no longer in effect. If the EPL comes to an end earlier than is currently planned, then the tax take from the project could be even lower. In order to calculate these figures, WWF Norway evaluated the projected financial outcomes of the Rosebank oil field using Rystad Energy data on production volumes and investment timelines. While previous exploratory costs are excluded from this analysis due to their relatively small size, the full investment costs from 2023 onward are included.[113]

83. Furthermore, the UK's decommissioning relief mechanism allows costs related to dismantling and cleaning up offshore fields to be deducted against current and past profits.[114] When decommissioning happens at the end of a project, the costs are deductible from taxable profits. If the company no longer has enough profits to be offset, it can carry back those costs to earlier years of profit and claim a repayment of the tax it paid in the past. As a result, while a project may generate tax receipts during operation, the Government will later forgo or repay a substantial portion of that when decommissioning occurs. The effective tax rate can, therefore, be substantially lower than the headline rate of 78% referred to in the Further Information.[115]

Misleading claims on energy security

84. The Further Information claims that the Rosebank Project will help to reduce the UK's net-import gap for fossil fuels consumed in the UK.[116] However, it acknowledges that the majority of the oil produced by the Rosebank Project will be sold on the international market and exported.[117] Across the whole of the North Sea, more than

[111] Equinor, above note 89, paras 4.1.-4.4.
[112] Jones D. & Lysta G. *Rosebank: private profit, public risk*, Uplift & WWF Norway, 19 June 2025.
[113] For more information on the methodology see: Jones D & Lysta G, above note 112.
[114] HMRC (2016). *Oil and Gas companies: tax relief for decommissioning expenditure*.
[115] Equinor, above note 89, para. 4.4.
[116] Equinor, above note 89, paras 1.6-1.10.
[117] Equinor, above note 89, para. 1.8.

80% of oil produced is exported.[118] This means that the Rosebank Project's oil will do little to reduce the UK's import dependency.

85. The Rosebank Project does contain a small amount of gas, which will partly be used in domestic gas supply. However, according to official projections, even if new North Sea fields such as the Rosebank Project are developed, the UK's reliance on imported gas is set to rise from 55% today to more than two-thirds dependent by 2030, and over 90% dependent by 2050.[119] The Rosebank Project itself has the potential to reduce annual gas import dependency by just 1% a year on average.[120]

86. Given the small amount of gas that the Rosebank Project might produce, and the fact that the price of gas is set by international markets, the Rosebank Project's gas would do next to nothing to reduce the UK's current vulnerability to global gas price shocks. As the IEA makes clear, "*new conventional field approvals cannot provide immediate relief for tight markets and may well make the later stages of the transition even more challenging*".[121]

87. Instead, the only way to lower bills, increase reliability and ensure energy security is to transition to clean energy made in the UK. This is further highlighted in the IEA's WEO, which shows that a NZE Scenario can lead to the lowest household bills - in comparison to other scenarios - through greater efficiency and lower fuel costs and increases overall energy system resilience, among others.[122]

Climate safety is more affordable than continued fossil fuel dependence

88. In addition to posing numerous threats to society, including the food system, biodiversity, infrastructure and human health, climate change creates significant costs for businesses, households and public services by undermining and disrupting crucial sectors of the economy.[123] Impacts on various sectors can, therefore, be translated into loss of socioeconomic welfare and reported as an equivalent loss of the UK's GDP.[124] Depending on the model used to estimate the macroeconomic impacts of climate change, the scale of the potential losses varies, and could be systematically underestimated if global weather impacts have not been included.[125]

89. Based on existing policies in 2022, "*the total cost of climate change damages to the UK are projected to increase from 1.1% of GDP at present to 3.3% by 2050 and at least 7.4% by 2100*".[126] Under a current policy scenario from 2025 to 2034 without further

[118] *UK's North Sea fossil fuel exports have soared despite licencing bonanza*, Global Witness, 19 January 2024.
[119] Duhig H. *Why Trump is wrong on North Sea oil and gas*, Uplift, 23 July 2025.
[120] Duhig H, above note 119.
[121] IEA (2023), above note 36, p.77.
[122] IEA, above note 8.
[123] Rising J *et al* (2022). *What will climate change cost the UK? A study of climate risks, impacts and mitigation for the net-zero transition*. London: Grantham Research Institute on Climate Change and the Environment, London School of Economics and Political Science, p.1.
[124] Rising J *et al*, above note 123; Note that the sectors included are drought and river floods; agriculture; livestock and fisheries; ecosystems; energy supply and demand; labour productivity; health; coastal impacts; and trade.
[125] Neal T *et al* (2025). Reconsidering the macroeconomic damage of severe warming, *Environ, Res. Lett.* 20: 044029.
[126] Rising J *et al*, above note 123.

measures taken, the average climate damage cost per household is £38,247 for this timeframe.[127] In 2025 alone, UK households face £3,000 in climate damage costs.[128] If strong mitigation measures are taken, the UK has the possibility to reduce the impacts of climate change damages from 7.4% to 2.4% of GDP by 2100.[129] Moreover, cutting the UK's emissions by 87% by 2040 could lead to a reduction of household costs by £1,400 a year by 2040 as the transition to clean energy reduces heating and motoring costs.[130]

90. More recent data from the Office for Budget Responsibility (**OBR**) confirms these earlier findings, showing that the cost of cutting emissions to net zero is significantly smaller than the economic damages of failing to act.[131] Additionally, the IEA's WEO spells out that taking ambitious measures and ensuring climate safety is more affordable than continued fossil fuel dependence (see above at paragraph 87), which would only worsen climate change impacts and consequently increase climate damage costs.

91. It is, therefore, clear that climate inaction will cost the UK more than climate action. The urgency to act now and to keep the global temperature as low as possible is highlighted in the IEA's WEO. The report states that because of the delay in reducing emissions as well as the "*continued high levels of emissions and recent investments in emissions-intensive infrastructure, temporarily exceeding the 1.5°C threshold is virtually certain. Even pathways that limit this overshoot to less than about 0.1°C, i.e. IPCC limited overshoot pathways, have slipped out of reach*".[132] To reach those, global CO_2 emissions would need to reach net zero in the mid- to late-2030s.[133] Plainly speaking, this would require "*a fall in emissions of around 3.5 Gt CO_2 per year - twice the drop seen in 2020 related to the Covid-19 pandemic - which would have to continue every year for at least the next decade*".[134]

92. Thus, it is a critical moment to not approve new oil and gas fields, including the Rosebank Project, but rather to scale up ambitions to limit global warming to the Paris Agreement's primary temperature goal of 1.5°C.

Conclusion

93. We consider the Further Information for the Rosebank Project to be inadequate and the Project unfit for approval in light of the significant effects of the Project's scope 3 emissions on the climate, the significant effects of the Project's upstream emissions

[127] *UK households facing £3,000 climate damage costs this year*, Global Witness, 15th April 2025.
[128] Global Witness, above note 127.
[129] Rising J *et al*, above note 123.
[130] Global Witness, above note 127.
Evans S, Gabbatiss J, Lempriere M (2025). *CCC: Reducing emissions 87% by 2040 would help 'cut household costs by £1,400*, *Carbon Brief*, 26th February 2025.
[131] Office for Budget Responsibility (2025). *Fiscal risks and sustainability*.
[132] IEA (2025), above note 8, p.316-317.
[133] IEA (2025), above note 8, p.317.
[134] IEA (2025), above note 8, p.317.

and significant effects of the Project on the marine environment, and the submitted other relevant information which requires further scrutiny, and is in parts misleading.

94. As set out throughout this submission, the scientific evidence is clear that new oil and gas production is not compatible with a 1.5°C or 2°C pathway. The world's fossil fuel production gap necessitates a decline in production, while approval of the Rosebank Project could lead to an increase of production. Meeting the UK's commitments under the Paris Agreement means no new oil and gas fields should be approved for development. Approval of the Rosebank Project would be directly contrary to the actions required for the UK to meet its national and international climate change commitments, and would undermine its climate leadership position.

95. On this basis, consent for the Rosebank Project should not be granted.

96. [redacted]

Yours sincerely,

Uplift
www.upliftuk.org

R0088

To whom it may concern

I am emailing to voice my opposition to the proposal for the development of the Rosebank oilfield for the following reasons:

1: Equinor's further information is not consistent with the British government's guidance on assessing the effects of downstream Scope 3 emissions.

2: Developing Rosebank would not be consistent with Paris-aligned pathways.

3: The likely detrimental climate effects of Rosebank would be significant. We cannot allow this to happen.

I am therefore making representation to the Secretary of State for Energy Security and Net Zero to refuse to agree to the Oil and Gas Authority's grant of consent.

With my thanks

[]

R0089

Good evening.

I am writing as a member of the British public to signal my opposition to the opening of a new Rosebank oilfield.

This is based on the significant damage which would be caused to marine life, damage to the environments of UK, Norway and the Faroe Islands, and because the opening of a new oilfield would be a complete betrayal of the UK's efforts to reduce carbon emissions.

We cannot play our part in minimising the ongoing climate catastrophe and approve projects like this. The two are incompatible.

[]

R0090

I am writing as a member of the British public to signal my opposition to the opening of a new Rosebank oilfield.

This is based on the significant damage which would be caused to marine life, damage to the environments of UK, Norway and the Faroe Islands, and because the opening of a

new oilfield would be a complete betrayal of the UK's efforts to reduce carbon emissions.

We cannot play our part in minimising the ongoing climate catastrophe and approve projects like this. The two are incompatible.

[]

Joint Nature Conservation Committee

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JNCC Reference: OIA-11106
OPRED Reference: ES/2022/001
Date: 20 November 2025

Rosebank Field Development Further Information, Equinor UK Limited

Thank you for consulting JNCC regarding the above-mentioned development updates provided by Equinor UK Limited, for which we received a consultation on 13 October 2025. JNCC has previously responded to the original Rosebank Development Environmental Statement (JNCC Ref: OIA-08921, OPRED Ref: ES/2022/001, dated 16 September 2022).

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit).

The proposed operations occur within the Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area (NCMPA) is designated for:

- Deep-sea sponge aggregations (Recover)
- Offshore subtidal sands and gravels (Conserve)
- Ocean quahog aggregations (Conserve)
- Continental slope (Conserve)
- Continental slope channels, iceberg plough marks, prograding wedges
- Slide deposits representative of the West Shetland Margin paleo-depositional system (Conserve) and
- Sand wave fields and sediment wave fields representative of the West Shetland Margin contourite deposits (Conserve)

Our review has focused on **Requirement 2 – The revised and updated assessment of the likely significant effects of the project on the environment that is not limited to downstream scope 3 emissions.** Our conclusions are provided below.

Headline advice

JNCC thank the operator for the updates that they have provided regarding the environmental impacts on the Faroe-Shetland Sponge Belt NCMPA. JNCC reiterate the advice that was provided in response to the Oil & Gas Licencing 33rd Seaward Round, where we strongly advised that no new oil and gas infrastructure should be located within any benthic MPA with a restore/recover objective and/or that are already having to be considered for compensation due to marine development impacts. We advise that, by crossing the Faroe-Shetland Sponge Belt NCMPA, the Rosebank Development gas export pipeline has the potential to hinder the conservation objectives of the NCMPA.

Specific advice

Section 4.3.2 Cold Water Corals

JNCC thank the operator for providing further information and clarification on the 'coral gardens' feature including criteria contained in Henry and Roberts.

Section 6.4.2 Potential seabed and habitat impacts including on protected sites

JNCC thank the operator for providing us with real time information regarding the footprint of infrastructure that has been installed for this development. We also agree with the conclusions that were provided regarding FeAST sensitivities.

Section 13 Conclusions

JNCC do not agree with the conclusion that the Rosebank development will not have a significant effect on the environment.

Please contact me with any questions regarding the above comments.

Yours sincerely,

[redacted]

[redacted]

[redacted]

Submission to Public Consultation on Rosebank Field Development ES/2022/001

[redacted]

Executive Summary

- Equinor accepts that the sensitivity of the climate system (the 'receptor') is high yet denies that the quarter of a billion tonnes of CO_2 that will be caused by its Rosebank project are of sufficient magnitude to have a significant effect on the climate system. The significance assessment undertaken in Equinor's Response is flawed in multiple respects. Had the significance assessment been undertaken correctly, the only reasonable conclusion that could be drawn is that the likely effects of the project on the climate are highly significant.
- The most consequential flaw in Rosebank's significance assessment is its failure to assess the likely effects of Rosebank *in cumulation with the effects on the climate of the emissions from "other existing or approved projects"*, contrary to a mandatory requirement in the Regulations. A conservative specification of the "other existing or approved projects" of which Equinor was required—by law and by the Supplementary Guidance—to take account is *all fossil fuel projects globally that that have received final investment decision and are therefore either currently operating or under construction / under development*.
- The emissions from those other projects of which Equinor was required to take account include the emissions from operating those projects for their technical lifetimes (so-called "committed emissions"). This is because rational producers will ignore the "sunk costs" from their investments and continue to produce fossil fuels from those projects as long as the market price is sufficient to cover the *marginal* cost of production (i.e. even if it is not sufficient to cover the *average* cost of production, which includes the sunk fixed costs). This phenomenon is known as economic "lock-in". An appropriate way of accounting for those emissions is to count the "embodied" emissions (effectively, scope 1 and scope 3 combustion emissions) from fossil fuel production projects globally.
- According to the best available science, when accounted for this way, more than 900 gigatonnes of carbon dioxide is likely to be released from projects that Equinor was legally required to account for when assessing the cumulative effects of Rosebank. This compares with a remaining global carbon budget of merely 130 gigatonnes (at the start of 2025) for limiting global warming to within the globally agreed objective of 1.5°C above preindustrial levels with a mere 50% probability (80 gigatonnes for a two-thirds probability). Rosebank's 249 million tonnes of scope 3 CO_2 emissions will add to the large excess of likely emissions from other projects relative to the remaining global carbon budget for 1.5°C.

- The emissions and oil demand trajectories from global emissions reduction pathways with which Equinor compares the emissions and production from Rosebank do not provide an assessment of the likely significant effects of Rosebank in cumulation with other existing or approved projects. This is because the models on which those pathways are based do not adequately represent likely project-level decision-making (lock-in effects) and do not differentiate between new projects and existing/under-development projects.
- Two approaches to assessing significance that do take account of cumulative emissions from existing and planned projects, and are therefore consistent with the Regulations and Supplementary Guidance, are outlined in section 3:
    - The first proposed approach considers whether there is room for new projects by comparing the cumulative emissions from existing and approved projects with authoritative estimates of the remaining global carbon budget for 1.5°C. The new project is highly significant if it adds emissions that, in cumulation with the emissions from those other projects, exceed the remaining carbon budget for 1.5°C.
    - The second proposed approach considers oil and gas demand in 1.5°C-aligned global emissions reduction pathways *alongside the likely oil and gas production from existing and planned projects* (the latter are overlaid onto those pathways to ascertain whether the projected demand can be met by projects already operating or under development). Where that demand can be so met, a new oil/gas project would add emissions beyond the 1.5°C goal, and would therefore be highly significant.
- Under either of the above-proposed tests of significance, the effect on the climate of Rosebank's emissions would be highly significant.
- In light of the foregoing, the Secretary of state should reach the conclusion that the Rosebank project will have a (highly) significant effect on the environment.
- Because of the extent of the excess of likely cumulative emissions from other existing and approved fossil fuel projects globally relative to the remaining global carbon budget for staying with 1.5°C, the large scale of Rosebank's emissions, the high sensitivity of the climate system (receptor), and the long-lived duration of carbon dioxide in the atmosphere, the project's significant effects are of grave severity, extent and duration, and these effects are well-understood.
- These highly adverse effects can be avoided by refusing to agree to the grant of consent for the Rosebank project.
- **Accordingly, we recommend that the Secretary of State refuse to agree to the grant of consent for the Rosebank project**.

1. Introduction

This document constitutes a joint submission by [redacted] academics to the public consultation on the Rosebank Field Development. In our response, we set out in section 2 why we believe Equinor's assessment of the 'significance' of Rosebank's effects on the climate is flawed and does not meet the requirements of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020 ('**the Regulations**') or of the *Environmental Impact Assessment (EIA) – Assessing effects of downstream scope 3 emissions on climate: Supplementary guidance for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects* ('**Supplementary Guidance**'). We then, in section 3, outline two approaches to assessing significance that we believe meet the requirements set out in the Regulations and the Supplementary Guidance, and explain why if Equinor used either of these approaches, there could be no reasonable conclusion other than that the emissions from Rosebank would have a highly significant effect on the climate. We conclude, in section 4, by recommending that the Secretary of State refuse to agree to the grant of consent for the Rosebank project.

Unless otherwise indicated, all references to '**Equinor's Response**' refer to Equinor's document entitled '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', submitted in response to OPRED's notice under regulation 12(1) of 21 July 2025 requesting further information about the effects of downstream scope 3 emissions from the Rosebank project on climate.

2. Equinor's assessment of the 'significance' of Rosebank's emissions is flawed, leading to an erroneous conclusion that the project is insignificant

Equinor accepts that the sensitivity of the receptor (i.e. the climate system) is high [6.3.3] but denies its emissions will be of sufficient magnitude to have a significant effect [6.3.4]. The significance assessment undertaken in Equinor's Response is flawed. It is contrary to the spirit and letter of the Regulations and the Supplementary Guidance. Had the significance assessment been undertaken correctly, the only reasonable conclusion that could be drawn is that the likely effects of the project on the environment (climate) are highly significant.

The main flaw in Equinor's significance assessment is the failure to take account of likely cumulative emissions from other fossil fuel projects globally (including the downstream scope 3 emissions from such projects). If Equinor's proposed test of 'significance' were adopted, every conceivable oil and gas project globally would be assessed as not being significant. This cannot be correct. Indeed, it would be contrary

to the spirit and letter of the Regulations and the Guidance. This is because the whole point of cumulative effects assessment is to avoid a situation in which an environmental protection objective is undermined through the approval of projects that are individually insufficient to breach the objective in isolation, but sufficient to do so when considered in cumulation with the effects of other past, existing and reasonably foreseeable projects—to avoid, that is, the so-called "death by a thousand cuts" problem (Nelson and Shirley 2023; Preston 2020, 434).

The Regulations and Supplementary Guidance were drafted to avoid that problem by requiring the thorough assessment of a project's effects in cumulation with the effects of other projects, which Equinor's response fails to undertake.

In section 2.1, we explain that a cumulative effects assessment that takes account of likely cumulative emissions from other projects globally is a mandatory requirement in UK law and specify the appropriate scope of such an assessment. We then demonstrate that Equinor's Response fails to adhere to this mandatory requirement, in violation of its legal obligations. Section 2.2 explains the main—most fundamental and most consequential—flaw in Equinor's assessment of significance, namely the failure to consider the effect of Rosebank's emissions in cumulation with other existing and approved projects. Section 2.3 details other flaws in Equinor's assessment of significance, which bias the result in its favour.

2.1 The legal requirement to consider likely cumulative effects

The Regulations state that "the developer **must** submit an environmental statement containing the information listed in Schedule 6, as relevant" (Reg. 8(1), our emphasis). The required information in Schedule 6 includes: "An assessment of the likely significant effects of the project on the environment, including those resulting from— … (e) **the cumulation of effects with other existing or approved projects** …" (Schedule 6, para (4)(e), emphasis added).

The phrase "other existing or approved projects" makes it clear that the assessment of cumulative effects must be **forward-looking**, in the sense that the developer must anticipate the effects to be caused in the future by other projects that exist or have been approved.

The scope of the mandatory cumulative effects assessment is **not limited to other projects controlled by the developer, to projects of the same kind, or to projects in the same jurisdiction**.[1] This position is reflected in OPRED's Offshore EIA Regulations

[1] This is the position under the EU EIA Directive: *Case C-531/13 Marktgemeinde Straßwalchen* [2015] ECLI:EU:C:2015:79, at [45]. In that case, the Court of Justice of the European Union was interpreting Annex III, Clause 1, of the predecessor to the current EIA Directive, concerning criteria for determining whether a project should be subject to an environmental impact assessment. This clause provided that "The characteristics of projects must be considered having regard, in particular, to", inter alia, "the

Guide, which states that the Environmental Statement should show that "the developer has identified potential in-combination or cumulative effects relating to other operations, *including those not controlled by the developer*, considering impacts at local, regional and national *or international* levels" (p.26, emphases added).[2]

Indeed, the relevant scope of projects that must be considered for the purpose of assessing the cumulative effects on the climate system of a new fossil fuel production project is **global**, since climate change is a global problem that results from the accumulation of sources of greenhouse gas (**GHG**) emissions in the global atmosphere, and the destruction of sinks. The Supplementary Guidance is clear on this point:

> Global GHG emissions are a relevant consideration to assessing scope 3 emissions and in understanding "the impact of the project on climate", as required under Schedule 6 of the EIA Regulations. OPRED would expect that these considerations will feature in any assessment of GHG emissions effects on climate. (p.8, footnote omitted)

This approach is also a matter of industry practice, as reflected in the IMEA Guide (p.21):

> The atmospheric concentration of GHGs and resulting effect on climate change is affected by all sources and sinks globally, anthropogenic and otherwise. As GHG emission impacts and resulting effects are global rather than affecting one localised area, the approach to cumulative effects assessment for GHGs differs from that for many EIA topics.

The Supplementary Guidance reflects each of the above requirements: "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" (p.12). Earlier on the same page, the Guidance states:

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cumulation with other projects" ("project" is defined, in art. 2 of that Directive, in precisely the same way as in art. 2(a) of the current Directive, i.e. Directive 2011/92/EU as amended by Directive 2014/52/EU). The Court stated that "… a national authority, in ascertaining whether a project must be made subject to an environmental impact assessment, must examine its potential impact jointly with other projects. Moreover, where nothing is specified, that obligation is not restricted only to projects of the same kind." (at [45]) Further, the Court stated that "… the assessment of the impact of other projects cannot be confined to municipal boundaries." (at [46]) It would be inconsistent were the same principles not to apply for the purposes of determining the information that a project proponent must provide as part of an EIA.

[2] The draft version of the Supplementary Guidance was amended specifically to avoid suggesting that only neighbouring projects were relevant. The Government's response to the consultation on the draft guidance states: "The guidance has been amended, confirming that the ES will need to include an assessment on the effects of scope 3 emissions on climate within a global context, noting that an assessment of cumulative effects forms an integral part of the overall assessment of the effects of the project on the environment. The example given in the draft guidance regarding tie-back facilities has been removed to avoid confusion." See DESNZ, *Environmental Impact Assessment (EIA) – Assessing effects of scope 3 emissions on climate: Government Response to the consultation on supplementary EIA guidance* (June 2025) (**UK Government Response to Consultation on Draft EIA Guidance**), p.13.

> OPRED expects that ESs will consider how the GHG emissions associated with a proposed project impact climate at a global level and a national level. This will likely involve assessment of the project's emissions against global climate objectives at the project level and *in cumulation with other global projects* … (p.12, emphasis added).

A question arises as to the **probability threshold** that determines the scope of other projects that must be considered on this analysis. The interpretive guidance to the EU EIA Directive (which the Regulations are intended to implement) provided by the European Commission adopts a "reasonable foreseeability" threshold in its definition of *cumulative effects*:[3]

> The incremental effects of an action when added to the effects of past, present, and *reasonably foreseeable future actions*. Cumulative effects result from individually minor but collectively significant actions taking place over a period of time.

The Regulations refer to the "likely" effects of the project in cumulation with the effects of other "existing or approved" projects. And the Supplementary Guidance refers to "existing and planned" projects.

A conservative threshold that would satisfy all these slightly different notions would count **all *fossil fuel* projects**[4] ***globally* that have received final investment decision (FID)** and are therefore *currently operating* ("existing") or *under construction / under development* ("planned"/"approved"). The concept of "planned" projects is ambiguous, but any sensible definition would include some projects that have not yet been approved. Approved projects are thus more foreseeable, and more likely, than those that are (merely) "planned". Projects typically receive FID *after* all necessary approvals are obtained. We focus on projects that have received FID for the purposes of discussing cumulative effects because lifetime emissions from projects that have received FID are highly likely to occur, for the reasons explained below.

It is highly likely that fossil fuel projects that have received FID will be operated for the full technical lifetime anticipated by their proponents because it will typically be economically rational for the proponents to operate them this way. Oil production requires a large, upfront investment in fixed costs. Consequently, oil will be produced

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[3] European Commission, *Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment* (2013), glossary, emphasis added.

[4] Strictly speaking, it is not *only* the cumulative emissions from *fossil fuel* projects that ought to be assessed, but rather greenhouse gas emissions from *all* project-based sources, since it is the effect of the project's *emissions* on the climate system, in cumulation with other *emissions*, that matters. We focus on fossil fuel projects because they are the main source of emissions and because data on fossil fuels is more readily available. It should be acknowledged, however, that this makes resulting estimates of cumulative emissions and cumulative effects more conservative—and hence more favourable to Equinor—than they ought to be. In this respect, we think the UK Government's Response to its Consultation on the Draft EIA Guidance is mistaken in stating that "Cumulative assessment should be carried out with consideration of the project interacting with other existing and planned *oil and gas* projects, in a global context" (p.17, our emphasis). We note that the limitation to oil and gas projects does not appear elsewhere in the Government's response, or in the final Supplementary Guidance itself.

even when the market price of oil is lower than the long-run opportunity cost of production. This is because rational producers will ignore "sunk costs" and continue to produce as long as the market price is sufficient to cover the *marginal* cost of production (i.e. even if it is not sufficient to cover the *average* cost of production, which includes the sunk fixed costs). This phenomenon is known as economic "lock-in" (Erickson et al. 2015; Green and Denniss 2018; Seto et al. 2016). This is why lifetime emissions from large-scale fossil fuel infrastructure projects, such as oil production projects, are known as *committed emissions* (Matthews 2014; Trout et al. 2022). (The same logic underpins the requirement in the Regulations to assess the emissions of the *proposed* project that are expected to be produced over *its* lifetime.)

The **emissions** that should be counted in any cumulative effects assessment are thus the emissions expected to be emitted over the technical lifetime of each of those other fossil fuel projects. The accounting of such emissions could in principle be done either from the perspective of fossil fuel *supply* projects (counting the emissions embodied in the project's reserves; effectively the project's scope 1 and scope 3 combustion emissions) or fossil fuel *consuming* projects (counting their scope 1 emissions) (Matthews 2014; Trout et al. 2022). In our view, when the project in question is a fossil fuel production project, as is the case with Rosebank, the former approach—known as *supply-side committed emissions accounting* (Trout et al. 2022)—is most appropriate for this purpose, and we shall proceed on this basis.

In sum, both existing (operating) and under construction / under-development (post-FID) projects fall well within any reasonable understanding of "other existing or approved projects" (per Schedule 6, para 4(e) of the Regulations),[5] "existing and planned projects" (per the Supplementary Guidance), "reasonably foreseeable" future actions (per the EU's definition of cumulative effects), and "likely" effects (per Schedule 6, para (4)). To comply with the Regulations (Reg. 8(1) and Schedule 6, para 4(e)), Equinor's assessment of the significance of the likely effects of the Rosebank project on the climate should therefore have included an assessment of the effects of Rosebank's scope 1, 2 and 3 emissions in cumulation with the committed emissions from, *at least*, all other existing and under-construction / under-development (post-FID) fossil fuel production projects globally (accounted for on a supply-side basis, i.e. including the emissions embodied in those projects' reserves).

Such an assessment would have been entirely practical, since data on oil and gas projects that have received FID is available to fossil fuel producers through widely-used service providers such as Wood Mackenzie, Rystad, and IHS Markit. Additionally, there are credible, peer-reviewed published estimates of committed emissions from fossil

[5] As noted above, FID usually occurs after all necessary project approvals have been awarded.

fuel production projects that could have been used for this purpose (Trout 2023; Trout et al. 2022; see also United Nations Environment Programme 2023).

2.2 Equinor's failure to identify cumulative emissions from other existing and approved projects globally

Equinor's Response fails to assess the significance of Rosebank's emissions in light of the emissions from other existing and planned fossil fuel projects globally in the legally-compliant manner outlined above in section 2.1. This is most consequentially reflected in the way that Rosebank (mis)uses global emissions-reduction pathways in its assessment of significance.

The Supplementary Guidance (p.12) provides that global emissions-reduction pathways (specifically, those used in the IPCC's Sixth Assessment Report) may be used in order to contextualise the magnitude of a project's emissions for the purpose of assessing the significance of those emissions' effects on the climate. But should global emissions pathways be used in this manner then the project's emissions must—in order to comply with the Regulations—still be considered in cumulation with those from other existing and approved projects globally. The Supplementary Guidance contains the following sentence (p.12):

> 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.

While the integrated assessment models (IAMs) that form the basis of such pathways do take into account a range of economic activities, including fossil fuel supply activities, two central features of these models mean that **they do not reflect the crucial distinction between existing (or under-development/construction) projects and *new* projects**, and therefore **do not represent the emissions from fossil fuel production projects that are *likely* to occur**:

i. The models do not generally delineate between existing/under-development fossil extraction projects on the one hand, and new projects on the other (see Box 1, below). Without this information, it is not possible to determine whether new projects (i.e. those not yet in development, such as Rosebank), are needed to meet demand within the normatively-constrained 1.5°C future.[6]
ii. The pathways that are relevant for contextualising a project's emissions are those that are *normatively-constrained* to achieve an exogenously specified

[6] This matters because, as explained above (section 2.1), once the capital in a project is sunk (as is the case for under-development or operating projects), its producers will produce so long as the price of oil is higher than the marginal cost of production.

temperature goal (e.g., 1.5°C).[7] These models are typically programmed to achieve such a target at *least cost*. The amount of fossil fuels supplied in these models is an endogenous (i.e. "within the model") response to projected demand for energy services, within these constraints (see Box 1 for further details). For this purpose, fossil fuel production is simply switched on and off as needed to meet such demand, as if directed by a "global central planner".[8] The models thus fail to capture the system inertia (lock-in effects) from existing and under-development projects explained above. As such, the models' key *normative* constraints (achieving the temperature goal and doing so at least cost) mean the model results do not reflect what is *likely* to occur, and therefore cannot be used to assess *likely* cumulative emissions.

Box 1: How IAMs represent fossil fuel supply

IAMs, in simple terms, work as follows:

1. A global temperature goal or carbon budget is defined by the modeller, and specified as a constraint that the model must achieve;
2. A range of assumptions are made, including:
    a. Key socio-economic factors like population and economic growth rates that drive demand for energy services such as mobility, heat in buildings or industrial output.
    b. The costs, potential build rates and emissions associated with various energy technologies and commodities to meet those energy service demands, e.g. the cost of extracting, transporting and using natural gas to provide heat in buildings.
    c. The availability and scalability of carbon dioxide removal technologies such as direct air capture.
3. The models are typically programmed to achieve the climate goal at least cost, given the various assumptions;
4. Typically, fossil fuel supply is represented in aggregate form, with reserves from different countries or regions brought online endogenously where these are the least-costly forms of energy supply to meet energy-service demands and subject to the global climate objective and key assumptions detailed in step 2, above. Where fossil supplies are not needed to meet such demands, they are implicitly left in the ground.

The IAMs thus do not typically disaggregate production by field, or represent the project life-cycle of each fossil fuel production project, nor do they capture the lock-in effects from sunk investment outlined above (section 2.1). Where models do represent existing and planned projects, this information on cumulative production from such projects is not provided in the modelling results.

[7] As explained below, the *only* such pathways that are relevant are those constrained to stay within 1.5°C warming.

[8] Unless the IAM/scenario is specifically set up to limit the phaseout rate of fossil fuel extraction/use.

For these reasons, it is not possible to determine the cumulative emissions associated with likely (or existing and planned) projects, as required by the Regulations and Supplementary Guidance, using global emissions-reduction pathways alone.

Modelled global emissions-reduction pathways *can* provide relevant context for assessing significance if *overlaid* with information about the likely emissions from existing and approved projects, as we explain below in section 3.2. The models project the amount of total global oil and gas supply (and associated emissions) that will be needed to meet energy service demands at least cost while staying within the specified global warming limits. But this information is only informative when considered alongside information about *the level of oil and gas production from existing and planned projects*: if the projected demand in the normatively-constrained models can be met by supply from existing and approved fields, *then no additional fields are needed*; approving a new field, in this context, would be clearly inconsistent with the relevant goal—a clear indication that the emissions from that field would be "significant".

Equinor ignores the oil and gas that is likely to be supplied by already operating and approved fossil fuel projects, and the associated emissions, comparing *only Rosebank's* expected production levels (and emissions) with the demand (and emissions) projected in the global pathways. It therefore fails to meet the mandatory requirement in the Regulations to conduct an assessment of the project's effects in light of cumulative effects from other existing and approved projects.

Equinor's frequent statements that there will still be demand for oil and gas in these scenarios neglects the fact that, in *relevant* (i.e. Paris-aligned) scenarios, *existing and planned supply will be sufficient to meet that demand*. For instance, Equinor states at [6.4.12]:

> Modelled mitigation pathways that envisage significant reductions in demand for fossil fuels across all sectors of the global economy and a rapid transition to a Net Zero global energy system, indicate that there will still be demand for oil and gas in the future. The Rosebank Development can contribute to meeting ongoing global demand in the context of international emissions reduction pathways whilst UKCS production, as a whole, is in decline.

Given that the best available science shows that there is sufficient existing and planned oil and gas production to meet demand under a 1.5°C scenario (Bois von Kursk and Muttitt 2022; Green et al. 2024; International Energy Agency 2021), the addition of the Rosebank Development would imply that one of the existing or under-development projects of equivalent size (or rather, equivalent emissions) would need to stop producing. That is highly unlikely, due to the economic lock-in effect discussed in section 2.1. It is also unlikely that any government would force the closure of existing oil and gas supply operations before the end of their economic lifetime, given the

"political" and "legal" lock-in effects that stem from sunk investments. Politically, firms and unions representing workers in existing and under-development projects lobby governments to ensure sunk investments remain profitable (Green et al. 2024). Legally, international investment treaties provide generous substantive and procedural protections to foreign investors in the event governments change laws that prevailed when investments were made (Green et al. 2024; Tienhaara et al. 2022). These economic, political and legal lock-in effects are typically not represented in the IAMs that underpin global emissions reduction pathways, and such effects make it highly unlikely that post-FID projects will stop producing early to make way for Rosebank's production and emissions.

Finally on this point, we note that Equinor's failure to understand the proper scope of the requirement to consider cumulative effects is evident from a footnote to the introductory paragraph of the section of its Response that purports to assess the significance of Rosebank's emissions on the climate (para 6.1.1). This paragraph reads as follows (footnote numbers as per the original paragraph):

> The Supplementary Guidance requires an assessment of the significance of the likely effects of Scope 3 Emissions and consideration of the cumulative effects of the proposed project with other existing and planned future projects[58], in a global context[59].

Crucially, footnote 58 to Equinor's Response states (our emphasis):

> Flexibility in the Rosebank Development design could allow Equinor UK Limited to develop long-term plans to maintain production and potentially extend asset life through the development of *nearby oil and gas opportunities*. The emissions from such potential opportunities are not included in this Assessment as they are not "planned future projects" for the purposes of the Offshore EIA Regulations, and also because it would be too speculative to carry out such an assessment because of the unknown details of such opportunities.

This footnote suggests Equinor interprets the Guidance's reference to "cumulative effects of the proposed project with other existing and planned future projects, in a global context" to mean merely *Equinor's own* existing and planned projects, *nearby Rosebank*. For the reasons outlined in section 2.1, above, this interpretation is mistakenly narrow. This narrow interpretation, moreover, robs the words "in a global context" (from the Supplementary Guidance) of their plainly intended meaning, i.e. cumulatively *with other projects globally* (see above, section 2.1). Rather, Equinor apparently interprets the phrase "in a global context" simply to mean that *only Rosebank* (and, per footnote 58, any nearby Equinor projects), would need to be assessed in light of *global contextual factors* (which they interpret to mean oil and gas demand, and global GHG emissions, as projected by global emissions-reduction pathways, as we discussed above).

2.3. Other flaws in Equinor's assessment of the significance of climate impacts from Rosebank

2.3.1 Equinor relies in part on emissions pathways not consistent with achieving the Environmental Protection Objectives (the Paris Agreement goal)

Equinor correctly acknowledges that climate agreements and policies are relevant Environmental Project Objectives (**EPOs**) [4.2.3-4.2.4], [4.3.1] (26–27) and the relevance of the Paris Agreement temperature goal ("Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change" (art. 2(1)(a))).

The recent Advisory Opinion on climate change issued by the International Court of Justice (**ICJ**)[9] interprets the Paris Agreement in light of recent decisions (**COP decisions**) of the Conference of the Parties to the UNFCCC serving as the meeting of the Parties to the Paris Agreement (**CMA**) concerning 1.5°C.[10] The ICJ states "1.5°C has become the scientifically based consensus target under the Paris Agreement", referring to decisions of CMA3 at COP26, and CMA5 at COP28 (outcome of first global stocktake); "Accordingly, the Court considers the 1.5°C threshold to be the parties' agreed primary temperature goal for limiting the global average temperature increase under the Paris Agreement" (para [224]). The Court adds that this interpretation is consistent with Article 4, paragraph 1, of the Paris Agreement, which requires that mitigation measures be based on the "best available science" (para [224]).[11]

Therefore, all the global emissions pathways that Equinor selects which lead to warming beyond (in some cases, well beyond) the 1.5°C goal should not be used to contextualise Rosebank's emissions; they are irrelevant to this assessment. This includes the IPCC's C3-C8 scenarios introduced in Table 13 and restated in Table 15 together with International Energy Agency (**IEA**) STEPS and APS referenced in Table 17 of Equinor's Response. Rather the appropriate pathways which do have at least some reasonable likelihood of limiting warming to 1.5°C are C1 and C2 from the IPCC and the IEA Net-Zero by 2050 (**NZE**) scenario. Of the pathways that Equinor considers, it is only these that should be used to contextualise the expected emissions from Rosebank.

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[9] *Obligations of States in respect of Climate Change (Advisory Opinion)*, ICJ, 23 July 2025.

[10] Equinor's Response (p.28, Table 5) acknowledges the relevance of COPs (including COP28 decision re fossil fuels), stating that "COPs set the global direction for climate policy". But the Response fails to acknowledge the legal effect of COP decisions generally, and the specific legal effect of recent COP decisions concerning the 1.5°C goal.

[11] As the Court notes at [83]: 'Indeed, in 2018, the IPCC concluded with high confidence that "[w]arming of 1.5°C is not considered 'safe' for most nations, communities, ecosystems and sectors and poses significant risks to natural and human systems"', citing the IPCC's Special Report on *Global Warming of 1.5°C* (IPCC 2019, Chap. 5, p. 447).

Furthermore, more generally when selecting 1.5°C global pathways to assess the significance of potential future fossil projects, it is important to ensure that the chosen scenarios pass feasibility tests across a number of key dimensions. These include ensuring the scenarios do not overly rely on implausible and unsustainable amounts of carbon dioxide removal—a collection of mitigation options that have been shown to have a substantial impact on the amount of fossil fuels consumed in global pathways (Achakulwisut et al. 2023). Approaches to these issues have been developed and operationalised by a number of studies in recent years (Green et al. 2024; Hare et al. 2018) and build off feasibility assessments by the IPCC (2019, 2022).

2.3.2 Equinor assesses Rosebank emissions against global emissions, contrary to the Guidance

Equinor takes the median emissions in 2030, 2040 & 2050 from across a range of scenarios as the benchmark (denominator) with which to compare its projected emissions in each of those years (numerator). This is flawed because many of those scenarios would exceed 1.5°C (also due to the non-recognition of cumulative supply from existing and planned fields). This approach is effectively just a slightly more sophisticated version of the 'compare a small number to a very big number' exercise—or 'drop in the bucket' logic—that the Guidance specifically warns is inappropriate (p.12):

> 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.

As noted earlier, if all projects were assessed for significance in this way, no projects would be considered to have significant impacts.

2.3.3 The use of IEA NZE and Production Gap analysis

Equinor's Response argues that Rosebank's production would be "Paris Agreement aligned" [6.4.9] with reference to two key analyses – i) the Production Gap Report (**PGR**) and ii) and the IEA's NZE scenario. Equinor highlights how Rosebank's levels of fossil fuel production are consistent with the 1.5 and 2°C-aligned production trajectories used in both reports.

However, the primary insight from the PGR is that governments' plans and projections of future fossil fuel production greatly exceed what would be consistent with the Paris Agreement's temperature goal (see Figure 1). The PGR highlights that it does not make sense to assess a country's fossil fuel production, or that of an individual project, in isolation. Equinor's Response oddly neglects this key conclusion, and uses the climate trajectories to compare Rosebank's emissions in isolation from all other existing and planned projects—exactly the opposite of what is intended in the PGR.

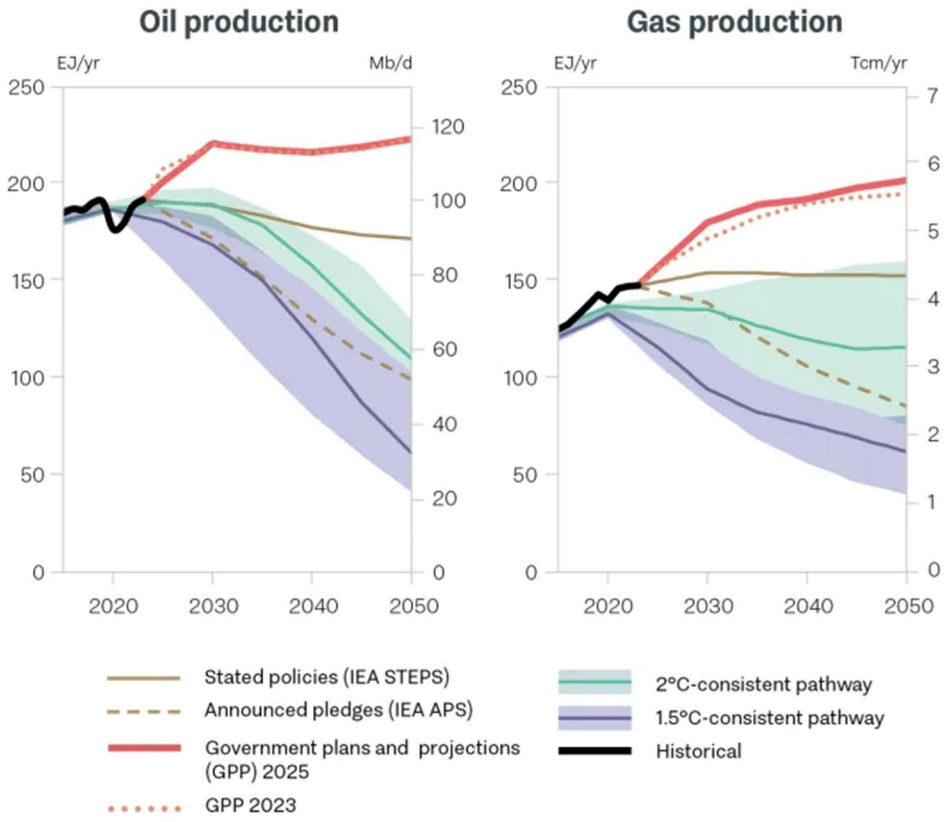

Figure 1. Planned oil and gas production versus global pathways. Red solid and dashed lines show government plans and projections compared with IEA scenarios (neither of which are Pari-aligned) and a range of selected 1.5°C and 2°C pathways from the IPCC's Sixth Assessment Report. Figure adapted from SEI et al. (2025).

In a similar vein, Equinor's Response states that the IEA concludes that "reducing fossil fuel supply investment in advance of, or instead of, policy action and investment to reduce demand would not lead to the required Net Zero outcomes". However, its Response rather curiously neglects the headline conclusion of the IEA NZE scenario that "Beyond projects already committed as of 2021, there are no new oil and gas fields approved for development in our pathway". This clear and unambiguous statement strongly implies that Rosebank is not a 1.5°C aligned project.

In relation to the above analyses, Equinor argues that there will be some ongoing demand for fossil fuels in net-zero scenarios [6.4.11]–[6.4.12]. It states that [6.4.12]:

> Modelled mitigation pathways that envisage significant reductions in demand for fossil fuels across all sectors of the global economy and a rapid transition to a Net Zero global energy system, indicate that there will still be demand for oil and gas in the future. The Rosebank Development can contribute to meeting ongoing global demand in the context of international emissions reduction pathways whilst UKCS production, as a whole, is in decline.

The fact that there will be continued oil and gas demand globally does not in of itself mean that Rosebank will have no significant impact. The fact that Rosebank could

contribute to meeting ongoing demand is irrelevant, since all fossil fuel projects can contribute to meeting ongoing demand. This does not tell us what impact there would be on the climate if all such projects proceed, which is the legally mandated assessment that must be undertaken, as explained in section 2.1, above.

2.3.4 Equinor's use of UK government climate policies and strategies (UK Gov-CPS) is not relevant to assessing significance

Equinor's Response refers to projected UK oil and gas demand from the Climate Change Committee (**CCC**) and Department for Energy Security and Net Zero (**DESNZ**), and projected production from the North Sea Transition Authority (**NSTA**), noting the gap between domestic demand and production [6.4.22]. It then states that:

> The graphs indicate that UKCS oil and gas production is less than the CB7 projected future UK demand under a decarbonisation pathway consistent with meeting the UK Net Zero targets and it is concluded that ongoing UKCS production is compatible with the UK's transition to Net Zero targets set under the Climate Change Act 2008 (as amended).

However, the CCC has confirmed that the expansion of fossil fuel production is not in line with net zero. It acknowledges that the UK will continue to need some oil and gas until it reaches net zero, but states that "this does not in itself justify the development of new North Sea fields" (Climate Change Committee 2023).

More generally, while the Supplementary Guidance does request comparison with national targets, given the government does not have targets for scope 3 emissions, there are no meaningful targets with which to compare proposed developments, including Rosebank. Such comparisons are therefore not "relevant" information for the purpose the Regulations (Reg. 8(1)).

3. How significance should be assessed: two approaches consistent with the Regulations and Supplementary Guidance

3.1 Comparison of project emissions and cumulative emissions (from existing and in-development fossil fuel projects) with remaining global carbon budget[12]

The most simple and transparent approach to meaningfully assessing the significance of a project's emissions involves:

[redacted] Fergus Green, 'The Overflowing Bucket: The Significance of Fossil Fuel Emissions under Environmental Impact Assessment Law', Working Paper, available from <https://www.ucl.ac.uk/social-historical-sciences/political-science/research/climate-politics/overflowing-bucket-fossil-fuel-emissions-and-environmental-impact-assessment-law>.

- summing the project's (scope 1, 2 and 3) emissions with committed emissions from other operational and under-development/construction (post-FID) fossil fuel projects (i.e. a cumulative emissions assessment as required by the Regulations and Supplementary Guidance, as discussed above, section 2.1), and
- comparing this summed amount with the remaining global carbon budget for staying within 1.5°C, with at least a 50% probability and preferably a probability that reflects a precautionary approach (e.g., 67%).

If the ratio is greater than 1, the cumulative effect of the project in light of other likely projects is such that it is clearly highly significant, since it is *contributing to an exceedance* of the remaining global carbon budget implied by the Paris Agreement's temperature goal. On this approach, the significance of the project's emissions will be greater, all else equal: the greater the project's emissions; the greater the committed emissions from other existing and approved projects; and the smaller the remaining global carbon budget. Each of these implications is highly intuitive and consistent with the best available scientific approaches for understanding the climate impacts of additional CO_2 emissions, as synthesised by the IPCC (e.g., IPCC 2023).

Rosebank's scope 1, 2 and 3 emissions are 254 $MtCO_2e$. Since remaining global carbon budgets are expressed in terms of CO_2 only, for consistency and simplicity we will simply take Rosebank's scope 3 (downstream combustion) emissions, which Equinor estimates in its Response to be approximately 208 $MtCO_2$ (at [5.5.2]). For future (likely) cumulative emissions from other existing and approved projects, we use the most recent available peer-reviewed estimate of committed emissions that uses supply-side accounting methods, i.e. accounting for the embodied emissions from operational and in-construction oil and gas fields and coalmines, which is 915 $GtCO_2$.[13] Combining these figures yields approximately 915.2 $GtCO_2$. Below, in Table 1, we compare this figure (numerator) with estimates of the remaining global carbon budget for limiting warming to 1.5°C (denominator) with varying degrees of confidence (83%, 30 $GtCO_2$; 67%, 80 $GtCO_2$; 50%, 130 $GtCO_2$), yielding a ratio that indicates the significance of Rosebank's emissions. We also provide a range of estimates of the remaining global carbon budget for temperatures between 1.5°C and 2°C (also with varying probabilities). All of these estimates draw on the best available science (Forster et al. 2025, p.2663, Table 8). However, we reiterate that only 1.5°C budgets are consistent with the Paris Agreement's temperature goal as interpreted by the ICJ (see above

[13] Trout et al's (2022) original study found committed emissions of 936 Gt CO_2, based on the situation in 2019 (the most recent year for which full data were available at the time of that study). An update to the oil and gas figures estimated these to equal 469 Gt CO_2 as at the start of 2023 (Trout 2023). Combining the updated (and not-rounded) oil and gas estimates with the 2019 coal estimate yields a total of 915 Gt CO_2.

section 2.3.1) and that a precautionary approach (e.g., at least 67% probability) is legally appropriate.

Table 1: Cumulative emissions from Rosebank and other existing and approved fossil fuel projects compared with remaining global carbon budgets

Temperature goal (avoidance probability)	Estimated remaining global carbon budgets from the beginning of 2025 (Gt CO2)	Cumulative emissions from Rosebank and other existing and approved projects divided by remaining global carbon budget
1.5°C (83%)	30	30.5
1.5°C (67%)	80	11.4
1.5°C (50%)	130	7.0
1.6°C (83%)	160	5.7
1.6°C (67%)	240	3.8
1.6°C (50%)	310	3.0
1.7°C (83%)	290	3.2
1.7°C (67%)	390	2.3
1.7°C (50%)	490	1.9
2°C (83%)	690	1.3
2°C (67%)	870	1.1
2°C (50%)	1050	0.9

Information in columns 1 and 2 is taken from Forster et al. (2025, p. 2663, Table 8). Column 3 numbers are derived by dividing (i) the sum of Rosebank's emissions and cumulative emissions from global fossil fuel projects (existing and under-development) as estimated by Trout et al (2022) (for coal) and (Trout 2023) (for oil and gas) by (ii) the remaining global carbon budget figure in the same row in column 2. A ratio of 1 or more indicates the project in question (here, Rosebank) will have a highly significant effect on the climate, with higher ratios indicating greater relative significance.

From Table 1, it can be seen that Rosebank's emissions in cumulation with emissions from existing and approved global fossil fuel projects dwarf remaining global carbon budgets for the Paris Agreement's temperature goal by a factor of between 7 and 30, depending on the adopted probability of avoiding the temperature increase. Even when using carbon budgets for temperature goals that are between 1.5°C and 2°C, the ratio is greater than 1 in all cases except for that of limiting warming to 2°C with a 50% probability—and even in that case, the ratio would be close to 1, especially when past emissions since the start of 2025 are factored in.

This implies that any new oil and gas project, including Rosebank, would have a *highly significant* impact on the global climate. The contingent fact that all new emissions are highly significant follows from the climate predicament in which the world finds itself: cumulative committed emissions from existing and under-development fossil fuel projects exceed the (rapidly dwindling) remaining global carbon budget for achieving the Paris goals.

A virtue of this approach to assessing significance is its transparency. Expressed as a simple ratio with only three parameters, the approach incorporates the most relevant information about the climate (warming) effects of the project in light of its relevant factual (biophysical) and normative context, and yields a straightforward result that is easy for non-experts to interpret. This transparency facilitates informed public participation in decision-making about climate-affecting projects, in line with the objectives of environmental impact assessment.[14]

The main limitation of this approach is that it does not factor in the role of carbon dioxide removal (**CDR**), which effectively increases the remaining global carbon budget estimates. But reasonable assumptions about feasible CDR levels can be made and transparently added to the denominator for this purpose. The best available science concerning feasibility and sustainability constraints on CDR suggests that this amount is highly constrained. Green et al. (2024) considered feasibility limits of 3 $GtCO_2$ per year for bioenergy combined with carbon capture and storage (**BECCS**) and 3.6 $GtCO_2$ per year of afforestation and reforestation by 2050. Assuming these levels were achieved in 2040 and maintained to 2100, this would equate to 396 $GtCO_2$ cumulatively for the period to 2100. This is similar to the feasibility estimates published by Achakulwisut et al. (2023) —224 $GtCO_2$ for afforestation/reforestation and 196 $GtCO_2$ for BECCS—who also estimated 320 $GtCO_2$ of direct air capture with carbon capture and storage (**DACCS**) as a feasible level for the period to 2100.[15] Despite these CDR estimates being labelled 'feasible', in fact they are highly ambitious and raise considerable sustainability challenges in terms of land, water and/or energy use such that it would be cavalier to simply assume that they will be achieved. Yet, *even assuming that these CDR deployment levels can be achieved*, the effect of adding these to the Paris-aligned (1.5°C) remaining global carbon budgets (i.e. increasing the denominator in our ratio) does not change the qualitative conclusion regarding the significance of the effects of Rosebank's emissions in cumulation with other existing and approved projects globally (the numerator): the ratio remains above 1 for all three 1.5°C estimates of the remaining global carbon budget provided by Forster et al. (2025) and listed in Table 1, above, indicating that the effect of Rosebank's emissions on the climate would (still) be highly significant.

[14] On the importance of transparency in environmental impact assessment, see Recital 16 to the EU EIA Directive; *Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters* (adopted 25 June 1998, entered into force 30 October 2001) 2161 UNTS 447 ('Aarhus Convention'), preamble; *The Norwegian State, represented by the Ministry of Energy v Greenpeace Nordic* (EFTA Court, Case E-18/24, 21 May 2025), [54].

[15] By comparison, in C1 scenarios analysed for the IPCC Sixth Assessment Report, median projections of afforestation/reforestation, BECCS and DACCS are 262, 334 and 30 $GtCO_2$ respectively (626 $GtCO_2$ in total) (IPCC 2022, p. 348, Table 3.5).

3.2 Comparison of project emissions with Paris-aligned mitigation pathways, overlaid with cumulative emissions from existing and in-development fossil fuel projects

Here we propose a second test by which the significance of a project's climate impacts can be assessed, using Paris-aligned modelled mitigation pathways. This approach overcomes the problems described earlier (section 2.2), whereby the cumulative emissions associated with existing and planned projects are not captured in the IAMs underpinning such pathways in the legally required manner. These cumulative emissions must be accounted for when assessing significance (per the Regulations and Supplementary Guidance). The approach we propose remedies this limitation of the models, rendering the analysis suitable for assessing significance in a legally-compliant manner.

The starting point is a recognition that the UK wants to, as a signatory along with other countries, achieve the Paris climate goals. The test therefore uses 1.5°C-aligned global mitigation pathways, above which the risks of even more serious climate impacts and tipping points increase significantly (IPCC 2019). As shown in Table 13 of Equinor's submission, this implies focusing on only the C1 and C2 categories of scenarios from the IPCC, and the IEA's NZE pathway.

From these pathways, it is possible to determine the cumulative demand for fossil fuels *that is compatible with the 1.5°C target*, including the amounts for oil and gas.

This test then asks whether existing and planned oil and gas projects can meet this demand, or whether a new project investment such as Rosebank would be required. If there is sufficient production capacity to meet demand, adding a new project would lead to a **significant** impact on the climate, as this project would in effect be adding emissions to the atmosphere that would lead to the 1.5°C target being breached (for reasons explained in sections 2.1 and 2.2 concerning lock-in effects).

To conduct this test, information on the *likely* production profile over the lifetime of existing and planned oil and gas projects is needed, since this is not represented by the pathways. Such information is available from a range of dataset providers that are widely used across the industry. This production profile should then be compared with the oil and gas demand profile from the modelled 1.5°C pathway. If the modelled demand is lower than the likely production profile, this implies that there is no need for investment in new projects. Any production above that demand level is significant, as it would inevitably result in emissions above the targeted temperature goal.

This approach [redacted] is illustrated in Figure 2 below.[16]

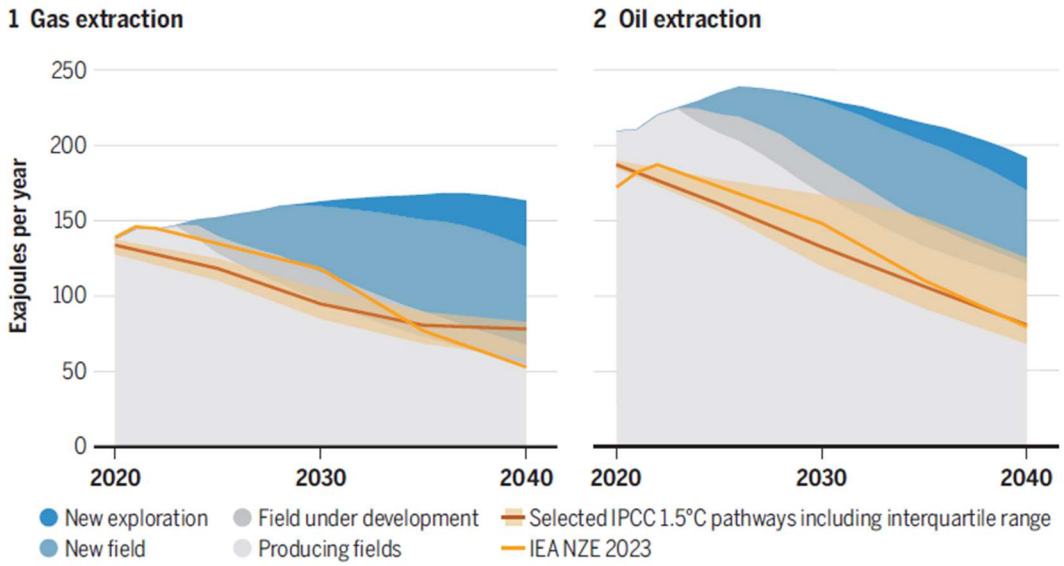

Figure 2. Existing and planned oil and gas production compared with oil and gas demand projected in 1.5°C scenarios. *Grey shaded areas represent existing and planned fields; blue shaded areas represent new fields; trend lines highlight 1.5°C aligned oil and gas demand, from the IPCC and IEA. Reproduced from Green et al.* (2024)

Were Equinor to have applied this test to Rosebank, it would have yielded the conclusion that Rosebank's emissions would have a significant effect on the climate, since existing and under-development projects are sufficient to meet oil and gas demand projected in the relevant range of 1.5°C scenarios.

4. Conclusion and recommendation

In light of the foregoing, the Secretary of state should reach the conclusion that the Rosebank project will have a (highly) significant effect on the environment. Because of the extent of the excess of cumulative emissions relative to the remaining global carbon budget for staying with 1.5°C, the large scale of Rosebank's emissions, the high sensitivity of the climate system (receptor), and the long-lived duration of carbon dioxide in the atmosphere, the project's significant effects are of grave severity, extent, and duration, and these effects are well-understood.

Equinor's Response proposes no measures to avoid, mitigate or offset its scope 3 emissions, which will cause 98% of this effect (nor do we think that such an effect could

[16] Green et al. (2024) analyse the C1 scenarios (limiting warming to 1.5°C with low or no overshoot) reviewed in the IPCC in its Sixth Assessment Report, including only those scenarios that do not exceed IPCC feasibility and sustainability thresholds on carbon sequestration (see above, section 3.1).

appropriately be offset). In any event, this effect can be avoided by refusing to agree to the grant of consent for the Rosebank project.

The Supplementary Guidance states that in reaching a decision, the Secretary of State will form a view of the overall balance of advantage between any potential significant effects on the environment and wider benefits to the interests of the nation and any other relevant factors in proceeding with the project.

The Supplementary Guidance states that when reaching a decision as to whether agreement should be given to the grant of consent, the Secretary of State will form a view of the overall balance of advantage between any potential significant effects on the environment and wider benefits to the interests of the nation and any other relevant factors in proceeding with the project (p.15).

Given the severity, extent and duration of the significant effects that Rosebank will have on the climate system, the project would need to bring extraordinary economic and social benefits to the UK in order to justify agreeing to grant consent for it to proceed. We have not undertaken further analysis of the economic effects of Rosebank, but we urge the Secretary of State to review evidence provided by others finding that Rosebank would at best generate minimal revenues and more likely cause net loss to the Treasury (Jones & Lysta 2025), would create relatively few jobs (Equinor, n.d.), and would make minimal if any contribution to energy security (Carthy et al. 2025; Taylor, 2024). Approving Rosebank would also undermine the UK's credibility as an international climate leader, with likely deleterious impacts on the ambition of other countries (Muttitt, Green and Pye 2025).

Accordingly, **we recommend that the Secretary of State refuse to agree to the grant of consent for the Rosebank project**.

[redacted]

[redacted]

[redacted]

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Rosebank Field Development Consultation Response from [redacted] Local Residents, Community Groups, and Organisations - Reference ES/2022/001

Rt Hon. Sir Keir Starmer MP
cc. Offshore Petroleum Regulator for Environment
& Decommissioning Department for Energy Security and Net Zero
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Dear Prime Minister Keir Starmer,

We are writing from [redacted] as local residents, community groups, and organisations who are greatly concerned by the proposed Rosebank field development. We are united in our view that the submission of Rosebank's revised Environmental Statement highlights an unacceptably high potential output of Scope 3 emissions.

Across the [redacted] community, conversations about Rosebank reflect a wide range of feelings: from pride in our history, to anxiety about our future, and above all a deep care for the place we live. We share these thoughts to inform your consultation and to call for the rejection of the Rosebank field – a decision that would recognise both our local reality and the UK's global responsibility to address climate change.

1. [redacted] difficult position and the economic reality

[redacted] has a long and complex relationship with oil and gas. Our communities have benefited economically in the past, and many of us feel an attachment to that history. Yet the Rosebank proposal risks dividing our islands. Some believe it will bring renewed prosperity, but that hope rests on promises that are not being fulfilled in practice. In reality, the project's economic benefits to [redacted] are extremely limited.

From our perspective, [redacted] hasn't seen the degree of local prosperity we would've expected from the project based on the expectations set by industry. While the port has seen a modest increase in traffic, the same can't be said for Sumburgh Airport and local firms. We aren't seeing the benefits locally for our people, communities, and local economy, and don't expect that to change.

Industry claims about job creation from the Rosebank project have proven to be vastly inflated. Equinor has acknowledged that, at best, the UK will benefit from 255 direct jobs – an unacceptably small number for a development of this scale taking place in our backyard.

[redacted] future energy prosperity should not lie in the hands of extractive corporations, but in the development of community-owned renewable energy projects. Jobs supported by the UK's oil and gas industry have more than halved – from 441,000 jobs in 2013 to just 214,000 in 2023. – despite hundreds of new licences being issued. The reality of decline is clear.

Furthermore, Rosebank's oil is not destined for UK consumers. Around 90% of Rosebank's production is oil which, like 80% of all North Sea oil, the reserves would be sold internationally to the highest bidder on the open market. Approving Rosebank would therefore not secure our energy independence, but only extend the UK's dependency on

fossil fuels. Rosebank's small share of gas (around 10%) may sustain limited employment on [redacted] but overall the project offers no meaningful or long-term benefit to our community.

2. Environmental and health concerns

Our seas are among the most precious and sensitive environments in Europe. A proposed pipeline from Rosebank would pass directly through the [redacted] Sponge Belt Nature Conservation Marine Protected Area, one of the most biodiverse deep-sea habitats in the region. It is home to slow-growing sponge communities that form the foundation of a crucial marine ecosystem supporting fish species central to [redacted] economy.

[redacted] landscape and natural environment are central to our health, wellbeing, and our way of life on the islands. Any further large-scale industrial disturbance at sea will only deepen the pressures already placed on our ecosystems and livelihoods. The sheer scale of the Rosebank project is disproportionate to the size of our islands and our infrastructure capacity, and no credible assessment has demonstrated benefits outweighing these risks.

We are also deeply concerned that the risk of oil spills from Rosebank have not been adequately addressed. Thousands of tonnes of oil have already been spilled into UK waters over the last five years, despite industry assurances of safety and best practices - including off the coasts of [redacted] and Aberdeen. Equinor cannot guarantee that a similar incident will not occur at Rosebank – the consequences of which could be devastating and long-lasting to us here at home.

Above all, Rosebank's potential emissions are our greatest concern. Burning Rosebank's oil will release vast amounts of CO_2, contributing directly to the climate crisis that is already harming communities worldwide, especially island communities like [redacted] which sit on the frontline of rising seas and extreme weather. The enormous Scope 3 emissions detailed in Equinor's updated Environmental Statement are simply incompatible with a safe climate and the UK's climate commitments, and must represent a red line for the UK government.

3. A call for a different path

There is a powerful lesson in [redacted] past. Our islands once relied on whaling, an industry that was vital to our economy but ultimately had to end for ethical reasons. Looking back, we tell that story of transition with pride. It reminds us that difficult change can be the right choice.

With Rosebank, we face a similar choice. The UK and Norway are among the world's wealthiest nations. We have the resources and the historical responsibility to draw the line here and leave our remaining oil in the ground. This would demonstrate genuine climate leadership, and a willingness to make the world better for future generations.

We urge the Government to to do the right thing and reject Rosebank; consider the climate implications in full, including downstream emissions; protect marine ecosystems through rigorous environmental safeguards; and support a just transition for workers and

communities, investing instead in community-owned renewable energy and sustainable industries in [redacted] and real pathways for workers into renewables.

[redacted] has contributed much to the UK's energy story, but our future must look different. We have the opportunity to make Rosebank a symbol of positive change. The UK can lead the world by aligning energy decisions with climate responsibility and fairness.

Please listen to the voices of smaller communities like ours, living at the frontline of both energy extraction and environmental change.

Yours sincerely,

[redacted]

IMPERIAL

[redacted]
Imperial College London

[redacted]

R0094

The Rt Hon Ed Miliband
Secretary of State for Energy Security and Net Zero
Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
Department for Energy Security and Net Zero,
AB1 Building, Crimon Place
Aberdeen, AB10 1BJ

20th November 2025

Re: ES/2022/001

Dear Secretary of State,

I am responding to the application by Equinor for development of the Rosebank field. [redacted] the assessment as giving a global total emissions limit of 130 GtCO2eq for a 50% chance of avoiding global temperature rises greater than 1.5C, [redacted]

A crucial backdrop to this assessment is the recent ruling from the International Court of Justice (ICJ) in July 2025 stating that states' production of fossil fuels and the granting of exploration licenses could amount to a violation of international law[2]. It highlights that achieving the 1.5°C goal requires that no new fossil fuel extraction projects be developed and that states may be held liable for failing to prevent environmental harm. Indeed, the same is largely true even allowing a period of mild overshoot. It is vital that assessments of emissions resulting from future fossil fuel extraction are undertaken using best practice from climate science.

The conclusion presented by Equinor that the additional emissions from the Rosebank development would be insignificant relies on a comparison of the project emissions with the total remaining carbon budget. Their analysis does not consider emissions that are already committed due to current and future production from existing or in-development fossil fuel projects. The significance of the emissions estimated to arise from the development can only be judged if they are considered as additional, cumulative emissions, in this wider context. Presented in this way, the scope 3 emissions from the Rosebank proposal can be seen as further emissions that are outside the world's remaining carbon budget to limit warming to 1.5 degrees. IPCC analysis from 2023 suggests that the emissions from existing oil and gas production facilities already exceed the maximum emissions level for a 50% likelihood of holding the global temperature rise to no more than 1.5 degrees. The analysis highlights, moreover, that emissions from existing and planned facilities will be close to the maximum level consistent with limiting temperature rises to 2 degrees, even on the assumption of no new production facilities being opened anywhere in the world[3]. As emissions have continued to increase in recent

[1] Forster P et al (2025) Indicators of Global Climate Change 2024: annual update of key indicators of the state of the climate system and human influence *Earth System Science Data* Volume 17, issue 6

[2] This research briefing by the House of Commons library provides a summary of the ruling for UK parliamentarians

[3] See Figure 3-5 Figure AR6 WG2, IPCC, 2023: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland, 184 pp., doi: 10.59327/IPCC/AR6-9789291691647

years, routes available to reducing emissions and limiting warming have diminished[4,5]. Our assessment of the remaining carbon budget has also reduced for variety of other reasons[6].

In conclusion, the analysis conducted by Equinor in its Environmental Statement is incomplete and misleading. The supplementary guidance for assessing the effects of downstream scope 3 emissions[7], published in June 2025, specifically advises 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.' Only on the basis of analysis that meets this requirement can an informed appraisal of 'significance' be reached.

Yours sincerely

[redacted]

[redacted] Imperial College London
[redacted]

[4] Friedlingstein P et al. (2025) Global Carbon Budget 2025

[5] United Nations Environment Programme (2025) Emissions Gap Report 2025: Off Target - Continued Collective inaction puts Global Temperature Goal at Risk

[6] Lamboll R et al (2023) Assessing the size and uncertainty of remaining carbon budgets, *Nature Climate Change* 13, 1360–1367

[7] DESNZ 2025 Environmental Impact Assessment (EIA) – Assessing effects of downstream scope 3 emissions on climate: Supplementary guidance for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects

GREENPEACE

Reference: ES/2022/001

Greenpeace UK Submission to OPRED on Equinor's Environmental Statement on Rosebank

Equinor are the proposed developers of Rosebank oil field to the west of Shetland Isles. It may act as a 'gateway' to other developments

Following legal rulings on the wider impacts of CO2 emissions from burning oil and gas (so-called 'Scope 3 emissions'), Equinor needed OPRED and the UK government to re-issue a development permit for the Rosebank field in order to proceed. The re-issuing of such a permit required the assessment of the impact of those Scope 3 emissions. In order to do this Equinor needed to assess the environmental impact of the CO2 emissions from the fossil fuels it extracted after they were burned.

Following the legal ruling, and before Equinor could apply for re-permitting, the UK Government needed to issue supplementary guidance so that the regulator OPRED (Offshore Petroleum Regulator for Environment and Decommissioning) had some benchmarks against which to determine whether the development should go ahead, given the environmental impacts.

Greenpeace has examined the Equinor 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" containing the new information about their Scope 3 emissions assessment

Greenpeace UK finds the following:

1. The **calculation of CO2eq emissions** seems reasonable given our understanding of the potential for fossil fuel extraction. Equinor have accepted that they should treat the emissions as all combusted (Appendix A, first bullet)

2. No **mitigation or alternatives to Rosebank development is proposed**. The implication of this is that the emissions are either not significant or that the benefits of extraction justify the disbenefits. However whilst Equinor have published a document on the economic benefits, there are demonstrably economic disbenefits to the climate system and human welfare of Rosebank going ahead

3. **Equinor fails to follow the regulatory guidance** because it does not assess Rosebank in the full context of other existing oil projects globally

The supplementary guidance states that (p12):

> "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."

It goes on to say (p12):

"the [Environmental Statement] 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."

This guidance is clear that an Environmental Statement

- can't rely on just saying the development is a 'drop in the ocean'
- should look at other fossil fuel developments in a global context

The Environmental Statement fails both these tests as outlined below in points 4 & 5

4. **Equinor justify the development of Rosebank on the grounds that it is a 'drop in the ocean'** compared to the global demand for oil and gas, even in a Paris Agreement aligned emissions trajectory. Yet every coal, oil and gas development globally could likely justify itself on those grounds so this provides no useful insight

Equinor *have* produced a table of expected oil demand globally compatible with 2C and 1.5C scenarios (Table 16, p47). It is derived from the UNEP Production Gap report. There is also in comparison to global emissions on a variety of emissions reduction pathways from Intergovernmental Panel on Climate Change and the International Energy Agency (Table 17, p49). The Statement then compares the expected production from Rosebank with those oil production/emission pathways, and concludes Rosebank remains small.

However these are both versions of the "drop-in-the-ocean" argument that the government's supplementary guidance says is not an adequate form of assessment, as stated above in the first quote from the regulator in point 3 above.

There is a further weakness in Equinor's addressing of the government guidance as they state that:

"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" (para 6.3.4)

However the government guidance does not say the alignment with global emission reduction pathways is the "key consideration". It says:

> *"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."* (p12, emphasis added)

Supporting a reasoned conclusion is not the same as being the key consideration. In contrast to the evidence presented by Equinor, modeling from UNEP's Emissions Gap Report 2025, released in November 2025, found that within the next decade, global temperatures will likely exceed 1.5°C above pre-industrial levels and that greenhouse gas emissions would have to fall roughly by 55 per cent by 2035 to align with the 1.5°C pathway, well above what countries have promised. A more achievable, though still difficult, goal is limiting warming to 2°C, which would require emissions to drop around 35 per cent by 2035. Current national commitments, if fully implemented, would cut emissions only 12 to 15 per cent by that date — leaving the world well off target.

The development of Rosebank would thus almost certainly contribute to the exceedance of the Paris Agreement targets (see point 5 below). The analysis by Equinor ignores this fact and assumes that the global emissions pathways are being followed, that even within these pathways that space for Rosebank's oil will be found, presumably at the expense of other (unspecified) fields (see point 6 below), and that the world will achieve only a 1.5 degrees temperature rise. Having regard to the above, we consider we are in a scenario where 1.5 degrees is challenging to meet and so this development would be significant, **as acknowledged by Equinor** in para 6.5.3 where they state:

> "In a scenario where Parties to the Paris Agreement have failed to "hold the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels", the emissions from any project, including the Rosebank Development, could have a significant effect on climate. This is because, all emissions in that scenario will have a significant effect due to the sensitivity of the climate"

5. **Equinor do not contextualise the impacts of the Rosebank development with the cumulative impacts of existing oil and fossil fuel projects**

Existing peer-reviewed research shows that for a genuinely Paris-Agreement aligned emissions trajectory there is already too much oil available through existing developments.

The researchers find 40% of developed (operating) fossil fuel reserves would need to close down to stay within the 1.5C limit, so that govts not only need to stop new licences, but to "prematurely decommission a significant portion of [reserves] already developed." It includes as part of the conclusion that "some developed oil and gas reserves, alongside coal, would need to be kept in the ground."

Notably there is no comparison in the Rosebank Environmental Statement with current expectations of either oil or of fossil fuel production, and what that would mean for a scenario where climate limits were adhered to.

At no point do Equinor attempt to analyse how the Rosebank development is situated within those emissions from existing developments - it would be reasonable to assume that in these existing developments, the economic (and possibly political) commitment to exploitation is already very high. It thus fails to address the guidance in the second quote from the regulator in point 3 above. No attempt has been made by Equinor to examine how Rosebank could fit in with the scale of existing oil and gas developments and so what fossil fuel is committed to already globally unless there is early retirement of existing extraction.

Because of this absence of analysis, the assumption underneath the data presented is that….

6. Equinor assumes, without evidence, that they and the Rosebank field **are the lucky ones that can still produce emissions** in those climate-constrained scenarios despite other developed reserves around the world.

Equinor choose to cite the International Energy Agency (IEA) scenarios to indicate Rosebank is compliant with the 1.5C limit - although in fact all it shows is that the amount of oil expected to be produced at Rosebank is smaller than the global demand for oil, in several different energy and climate scenarios. The IEA have previously stated, and continue to say, that staying within the 1.5C temperature limit requires that no investment in new oil and gas is required.

If the full analysis of expected global production had been done, it would have been clear that Rosebank production compatible with 1.5C or even 2C scenarios would require that oil somewhere else in the world, from existing reserves, would have to stay in the ground.

For reference, Trout et al estimate that committed fossil fuel projects would create emissions of 936GtCO2, of which 35% is oil. This means that existing oil projects *on their own* would produce 328GtCO2, more than twice the 'carbon budget' for a 1.5C scenario of 130GtCO2 that Equinor quote in para 3.2.12. Keeping the globe on track for the internationally agreed target of 1.5C would mean around 60% of existing reserves

need to stay in the ground. Under these circumstances it is very hard to see how it makes sense to develop more oil reserves, or if so what mechanism Equinor proposes that means other existing oil developments shut down early to give it the 'space' to be exploited.

It is also the case that the 0.2% of that 130GtCO2 carbon budget remaining to society that Rosebank represents is not trivial. There is no analysis of the impact of Rosebank's development ON TOP OF existing projects that are already producing

In the absence of applying the tests laid out above, the kinds of analysis and justification laid out in the Environmental Statement could be used to justify any fossil fuel development in the world.

7. Greenpeace UK concludes that **the Environmental Statement does not justify Rosebank, and is not compliant with regulatory requirements.** This is what OPRED should conclude, which would be in alignment with recent legal judgements in Norway. A submission from Greenpeace colleagues in that country is attached to this one

8. **Missing from the analysis is the economic damage caused by the emissions** from the Rosebank development. These are likely to be considerable. One paper determined, only looking at heatwaves, that "adding 4,434 metric tons of carbon dioxide in 2020…causes one excess death globally in expectation between 2020-2100"

Thus simple arithmetic indicates that Rosebank scope 1-3 emissions of 254 million tCO2eq would lead to 57,284 heat related deaths. Using the Treasury Value of Prevented Mortality of £2 million per death suggests the value of not going ahead with Rosebank is over £114 billion. Clearly this is a rough-and-ready calculation, but it does not include on the economic downside, for example, infrastructure damage, air pollution impacts, or mortality and morbidity from non-heat related climate impacts (e.g. drought, flooding, wildfires, extreme storms etc). Rosebank is not economically justifiable in anything other than the most blinkered and reductive way.

Equinor's own estimate of value is that "Over its lifetime, Rosebank will contribute £25 billion in Gross Value Added" (para 2.3) showing just how economically wrong-headed permitting this new field would be.

[redacted] Greenpeace UK,
November 2025

Greenpeace Norway

Offshore Petroleum Regulator for Environment and Decommissioning
Reference: ES/2022/001

Rosebank EIA Consultation statement

Greenpeace Norway welcomes the opportunity to comment on Equinor's assessment of combustion emissions from Rosebank. Our submission highlights Norwegian and European legal jurisprudence that is directly relevant to the UK and OPRED's obligations. Based on this analysis, we conclude that Equinor has not adequately addressed the required impacts and that the EIA cannot be regarded as legally compliant.

Equinor's EIA is incompatible with the EU EIA Directive

Why the interpretation of the EU EIA directive is relevant to the UK
The UK's EIA regulations are based on the EU EIA Directive, and many elements of the Directive remain in place through the European Union (Withdrawal) Act. Further, the UK Supreme Court's decision in [2024] UKSC *Finch* confirms that the EIA process must assess downstream greenhouse gas emissions from the project's products. It is on the basis of this case law by the UK Supreme Court that the UK Guidance on assessing scope 3 emissions was updated, resulting in Equinor's new assessment. Thus, the EU EIA Directive has clear legal significance and relevance in UK jurisdiction.

The recent judgement in Borgarting Court of Appeals
The legal requirements of scope 3 impact assessments, under the EU EIA directive, were recently clarified by the Borgarting Court of Appeal in Norway. The appeal case follows Greenpeace Nordic et. al.'s victory in the Oslo District Court in 2024 (case 23-099330TVI-TOSL/05), a judgment which was referenced and described as "persuasive" by the UK Supreme Court in *Finch* (para 173). Following the Oslo District Court ruling, Equinor and Aker BP have both submitted new EIA's of their respective projects – which the Norwegian Court of Appeals has now considered.

In case LB-2024-36810-4, handed down on November 14th 2025, the Court of Appeal concluded that the updated assessments do not satisfy the requirements under the EIA directive, and quashed the operators' licenses (PDOs).

The Court of Appeal clarifies that, in order to be aligned with the EIA directive, impact assessments must at the very least: i) assess the effect of cumulative combustion emissions from all Norwegian petroleum activities, ii) assess whether the project is compatible with the remaining 1.5 degrees carbon budgets, and iii) assess the indirect effects of greenhouse gas emissions on the factors listed under Article 3 of the directive:

(a) human beings, fauna and flora;
(b) soil, water, air, climate and the landscape;
(c) material assets and the cultural heritage;
(d) the interaction between the factors referred to in points (a), (b) and (c).

Attribution science is prominent in the latest IPCC reporting cycle, which constitutes best available science. Therefore, requirement (iii) listed entails using climate attribution science to quantify the effects that the project's downstream emissions will have on factors such as exposure of children worldwide to extreme weather events, melting of ice from ice caps and glaciers, melting of snow, sea level rise, heat deaths, etc.

Furthermore, the Court of Appeal clarifies, in accordance with the EFTA Court's recent advisory opinion in case E-18/24 and the UK Supreme Court's judgment in Finch, that environmental impact assessments must be carried out on the basis of gross emissions. The assessment must assume all greenhouse gases embedded in the petroleum resources will be released into the atmosphere. The analyses cannot rely upon speculative market substitution assumptions.

Similarly, the European Court of Human Rights recently confirmed in Greenpeace Nordic et al. v. Norway that it is forbidden under the European Convention of Human Rights (ECHR) Article 8 to approve oil and gas fields without carrying out in advance publicly available environmental impact assessments of the climate harm that would ensue from all gross emissions embedded in a field. The assessment must account for all cumulative emissions, assess the compatibility of producing the oil and gas towards international and national climate targets, including the remaining global carbon budget, and assess impacts for life and health.

Equinor's Rosebank assessment does not comply with any of the requirements clarified in the recent Court of Appeal judgment. First, the assessment does not consider the cumulative effects of combustion emissions from the UK petroleum sector. Second, while Equinor claims to have assessed Rosebank's compatibility with limiting warming to 1.5 degrees, their argument relies solely on the assumption of substitution. Equinor has merely considered whether the amount of oil expected to be produced at Rosebank is less than the global demand for oil, in several different energy and climate scenarios, some of which are aligned with the 1.5 degree target. In section 6.3.4 Equinor states:

> *"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".*

Equinor's analysis disregards that the world has already committed to producing far more fossil fuels than can be combusted without massively overshooting 1.5 degrees of warming (Trout et. al.). The only way to align Rosebank with a 1.5-consistent pathway, is to assume that Rosebank completely substitutes other producers' oil. That would go against the consistent clarification from the UK Supreme Court, the EFTA Court advisory opinion and the judgement from the Court of Appeals: The EIA must rely upon the gross effect of adding 254 $MtCO_2$ into the atmosphere, not undocumented assumptions around market substitution.

Third, Equinor has not assessed the indirect effect of adding 254 MtCO2 to the atmosphere, on the factors listed in Article 3 of the directive. Through best available climate attribution modelling, it would be possible, and relatively easy, to calculate Rosebank's effect on mortality, health, soil, water, air, climate and other factors. It is hard to understand why Equinor has not estimated Rosebank's effect on these factors. People have the right to know how the project will affect their lives, as legally required by the EIA regulations applicable to Rosebank.

To remain consistent with interpretation of the EIA Directive, and thus minimise the misalignment of UK and EU under the Trade and Cooperation Agreement, there should be consistency of interpretation of the judgments of the application of the EIA Directive. We believe that the UK government should follow the interpretation of the assessment of Scope 3 emissions and find that the Equinor scope 3 assessment is inadequate, and refuse to grant any permit for exploitation.

[redacted] Greenpeace Norway
[redacted] Greenpeace Norway

R0097

Hello,

I am writing as a member of the British public to signal my opposition to the opening of a new Rosebank oilfield.

This is based on the significant damage which would be caused to marine life, damage to the environments of UK, Norway and the Faroe Islands, and because the opening of a new oilfield would be a complete betrayal of the UK's efforts to reduce carbon emissions.

We cannot play our part in minimising the ongoing climate catastrophe and approve projects like this. The two are incompatible.

Best wishes,

[]

R0098

To whom it may concern

I'm writing to provide input into the consultation process on Rosebank oil field development.

In brief I am NOT in favour of the development, there appears to be little benefit to the UK economy or population.

Equinor is a Norwegian state owned company and this project will be supported by UK taxpayers.

Given the climate crisis and the associated costs in dealing with impacts and the sorry state of the UK finances this does not stack up.

I'm one of the 80% of the UK population that supports action against climate change.

[]

R0099

I urge the government to reject the Rosebank decision. Climate change is so serious that the best thing that the UK can do is to drill no more oil.

I am a member of [] My community has a lot of renewable energy and heat our buildings with our own biomass. We have branch houses in the Pacific where climate change is as

already making big changes and so are very aware of how it is affecting some of the poorest people on earth.

Yours sincerely,

[]

R0100

Dear Sir or Madam,

I am writing as a member of the British public to signal my opposition to the opening of a new Rosebank oilfield.

This is based on the significant damage which would be caused to marine life, damage to the environments of UK,

Norway and the Faroe Islands, and because the opening of a new oilfield would be a complete betrayal of the UK's efforts to reduce carbon emissions.

We cannot play our part in minimising the ongoing climate catastrophe and approve projects like this.

Regards,

[]

R0101

Dear Secretary of State

I am writing to express my view that a new licence should not be granted for the Rosebank field on the following grounds:

- Equinor's further information is not consistent with the British government's guidance on assessing the effects of downstream Scope 3 emissions.
- Developing Rosebank would not be consistent with Paris-aligned pathways.
- The likely climate effects of Rosebank would be significant.

Although there is great pressure from Fossil Fuel lobbyists to grant such a licence and warnings of the negative effects on the economy and on jobs, I believe that developing Rosebank or any oil or gas fields does not align with the Government’s commitment to Net Zero or with what is required to minimise the impacts of the Climate Crisis.

The UK must lead the way to a just transition to clean, green energy and must support those affected into other jobs that should be created by such a transition. Investing in

clean energy jobs and industries is the way forward, to ensure just transition and economic diversification for workers and communities.

I am grateful to you for the stand you are taking at COP30 and trust that your actions will match your words.

Kind regards

[]

R0102

As a British citizen I wish to register my opposition to the opening of a new Rosebank Oilfield.

In addition to the damage to the marine environment, the opening of this oilfield would be a betrayal of the UK's commitment to the reduction of our carbon emissions.

The world is facing a climate catastrophe. We cannot abdicate our responsibility to combat it by giving the go-ahead to this project.

[]

Rosebank oil field ES/2022/001

1. Please accept this as a response to the public consultation on Rosebank Field Development, OPRED reference ES/2022/001, by me, [redacted]
2. The Equinor document 'Response to Requirement #1 (An assessment of the effects of downstream scope 3 emissions from the above project on climate)'[1] does not provide sufficient context or information to evaluate environmental effects of Scope 3 greenhouse gas (GHG) emissions. (This may be owing to inexperience with requirements as interpreted in the Finch judgement, or an attempt to avoid considering them, or to have them considered by the Secretary of State.)
3. Neither as far as I can see does it satisfy the 'Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020', schedule 6[2], which is very similar to the regulations assessed in the Finch case in referring to 'indirect, secondary, cumulative … and long-term' effects. In particular, paragraph 4 of that schedule requires the environmental statement contain 'an assessment of the likely significant effects of the project on the environment, including those *resulting from* ... (f) the impact of the project on climate'. The Equinor document fails to do this.
4. The Equinor document erroneously describes the project's GHG emissions as 'not significant', specifically 'when viewed in the context of international climate commitments'. As an example of how the high estimate of 248,682,000 tonnes of downstream CO_2 emissions is patently significant, it equates to approximately **60,000 human deaths** from climate effects before 2100, according to the IPCC-derived 'mortality cost of carbon'[3] or 'thousand tonne rule'[4].
5. That is just an example of likely indirect significant effects resulting from the project's impact on climate that have been omitted. The work to provide adequate information to inform the Secretary of State's decision, if it has been done, has not been done by Equinor or its consultants. OPRED's supplementary guidance refers to IPCC (2023), the Synthesis Report that also summarises indirect environmental effects of GHG emissions, including ocean acidification, droughts and continuing 'substantial damages, and increasingly irreversible losses, in terrestrial, freshwater, cryospheric, and coastal and open ocean ecosystems … risks of species extinction or irreversible loss of biodiversity'. Local damages from the Rosebank project, not mediated by carbon flows from rock, would include those on the Faroe-Shetland Sponge Belt MPA, quahogs and fin, blue and sei whales. However, if you downscale the loss of coral reefs between 1.5 and 2.0 °C, the Scope 3 emissions of Rosebank would result in the destruction of something of the order of 100 km² of coral habitat.[5] To understand the full environmental effects of a project like Rosebank necessarily requires looking at global ecosystem effects under a variety of plausible emission scenarios, as well as estimating statistical expectation of damages from tipping points such as Amazon dieback and loss of glacier-fed ecosystems.
6. Para 1.7.4 of the document is incorrect and misleading in intent and detail. In particular, 'the development aligns with Paris Agreement aligned production pathways' is false, even if it is predicated on all other fossil fuel developments being halted (which would not in any

1 https://assets.publishing.service.gov.uk/media/68ef61fd82670806f9d5e0a9/Rosebank_Reg_12__1__Assessment_of_Scope_3_Emissions__OPRED_131025__errors_corrected.pdf

2 https://www.legislation.gov.uk/uksi/2020/1497/schedule/6

3 Bressler, R.D. The mortality cost of carbon. *Nat Commun* **12**, 4467 (2021). https://doi.org/10.1038/s41467-021-24487-w

4 Pearce JM, Parncutt R. Quantifying Global Greenhouse Gas Emissions in Human Deaths to Guide Energy Policy. Energies. 2023; 16(16):6074. https://doi.org/10.3390/en16166074 See also Pearce JM, Parncutt R. Quantifying Global Greenhouse Gas Emissions in Human Deaths to Guide Energy Policy. *Energies*. 2023; 16(16):6074. https://doi.org/10.3390/en16166074

5 Estimates of global shallow coral in Lyons et al (2024) https://doi.org/10.1016/j.crsus.2024.100015. See also IPCC (2018)

case be in line with the guidance of the assessment being 'cumulative'). It also refers to 'frameworks like the Paris Agreement which aim to limit warming to below 2°C' which is a misrepresentation of the Paris Agreement which refers to '**well below** 2 °C' and the World Court ruled in July[6] that the primary temperature goal is the 1.5 °C target.

7. The Government's 'Building the North Sea's Energy Future' document, which looks forward to just transition led by communities and workers with good, sustainable jobs and a healthier, fairer, prosperous future, also has an objective 'to take a globally standard-setting, **1.5°C** and climate science-aligned approach to future oil and gas production'. That objective translates globally into shutting down at least 60% of active extraction, and certainly not adding any more.[7] Existing fields in production are already breaching the Paris targets, so in no way is new oil aligned with Paris.
8. The total amount of known, unexploited fossil reserves, including Rosebank, is around 3.5 trillion tonnes of CO_2, or another 'trillionth tonne' of carbon. That vastly exceeds the above thresholds.[8] Were there any general rule to permit fields such as Rosebank, warming would almost certainly exceed 3 °C above pre-industrial.
9. The IPCC's 'reasons for concern' ('burning embers') figures have been showing increasing perception of risk, and since the Paris Agreement there is new knowledge of the range of catastrophic tipping points, including Amazon dieback, ocean current collapse and metres of locked-in sea-level rise, beyond 1.5 °C.[9] A long-term tipping point resulting in mass extinction has been estimated Prof Daniel Rothman of MIT at roughly the amount of fossil fuel emissions corresponding to 2 °C.[10]
10. Various estimates have been made about the point when construction of new fossil fuel infrastructure must cease, from 2017 on, based on remaining carbon budgets[11] and expected lifetime of investments, such as the IEA's 2021.[12] So far as I know, all credible estimates are now passed, confirming that permitting new development would breach international climate commitments. Note that those commitments are independent of domestic NDCs or the concerns of CCC carbon budgets. In terms of global cumulative emissions, approving Rosebank would not be consistent with a categorical imperative of the temperature targets, spelled out in detail by the UCL Bartlett report.[13]
11. The supplementary guidance rightly says '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 level'. Nevertheless, this is what Equinor has presented, so that the assessment in meaningless. In presenting 'an assessment of scope 3 emissions in relation to the current state of climate and global emissions-reduction pathways' 254 $MtCO_2$ is clearly significant when future baselines in those pathways exceed targets. I note that Equinor says no mitigation is possible, without addressing a possible condition of 100% carbon takeback obligation.
12. Were government agencies to request a proper assessment with adequate information from Equinor, it would not change the facts, just make them more obvious now that Scope 3 emissions are to be considered in environmental effects.

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6 Carbon Brief, 25 July https://www.carbonbrief.org/icj-what-the-world-courts-landmark-opinion-means-for-climate-change/

7 https://oilchange.org/blogs/shut-down-60-percent-existing-fossil-fuel-extraction-1-5c/ That was a 2023 assessment so the 60% figure for early retirement will now be higher.

8 https://carbontracker.org/finally-we-have-a-global-registry-of-fossil-fuels/

9 Eg Armstrong McKay et al (2022) https://doi.org/10.1126/science.abn7950 See also risk assessments by University of Exeter and the Institute and Faculty of Actuaries https://global-tipping-points.org/risk-dashboard/

10 Rothman (2017) https://doi.org/10.1126/sciadv.1700906#F4 See his 2019 paper for mechanism.

11 For example, Forster et al (2025) https://essd.copernicus.org/articles/17/2641/2025/

12 https://www.theguardian.com/environment/2021/may/18/no-new-investment-in-fossil-fuels-demands-top-energy-economist

13 Muttitt et al, 'The Climate Implications of New Oil and Gas Fields in the UK', July 2025. https://www.ucl.ac.uk/policy-lab/sites/policy_lab/files/report-climate_implications_pages_online.pdf

13. If the government decision accepts tens of thousands of deaths and enormous, if distributed, environmental destruction as a result of granting consent; and a global policy compatible with such decisions that would result in around 3 °C of global warming and the consequent extreme risks of passing tipping points and mass extinction; and decides that habitability of the biosphere for future generations is not a concern either, then in my opinion it should make all that explicit to the public. Otherwise, logically Rosebank cannot proceed. I look forward to the government drawing a clear line under new oil and gas.

R0104

Secretary of State, energy security and net zero

Re Equinor's Submission regarding Rosebank Oilfield Development

20 November, 2025

Dear Secretary of State

I recommend decision b), that the Secretary of State refuses to agree to the OGA's grant of consent, based on the application from Equinor not being compatible with the Department's EIA scope 3 emission Guidance published June 2025.

A summary of the guidance could be "no UK consents granted unless granting reduces the total amount of global CO2 emissions", *1

This being clearly not the case, Equinor were struggling. A summary of Equinor's submission could be "We, and many others, have signed the Paris Agreement, to keep warming below 1.5C, so the grownups are in charge, and everything will be fine".

True , we have signed, but the IEA and UN have stated that this (1.5C) will only be met if no new fossil fuel developments are started (from 2021). So just need to respond "You are right, the grownups are in charge, application rejected"

No doubt Equinor will take the UK to court at the investor-state dispute settlement ISDS. Given the high tax regime on the North sea, and difficult nature of the Rosebank field, proceeds are likely to be modest even if we lose. In any event, given the UK's strength in courts and lawyers, we are in a very much better position than most countries globally to stand up to this type of pressure. I suggest the public will be supportive during any court dispute on this.

From the economy and tax side, North sea oil and gas taxes yielded only £4.5bn 2024-2025, 0.5% of total tax take, declining steeply, less than the BBC spends. Direct employment ~30,000 people (around 0.1%workforce), indirect ~100,000 (0.3%workforce). In summary, fossil fuel production represents a very small portion of our economy - so if we can't stop new oil and gas developments, who can?

Surveys suggest between 69% and 89% of the population want more action to protect the environment, so turning down this consent should be a very popular move, is consistent with the spirit of the manifesto,.and should make a significant medium term contribution to future electoral support across the majority of the public.

Yours sincerely,

[]

**1 see bottom p12, essentially ruling out substitution arguments, 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. top p 14, ruling out carbon credits unlikely that the purchase of credits will be an effective mitigation measure for the purposes of the Offshore EIA Regulations.*

R0105

Dear opted,

I am completely against opening up this oil field. We need to cut fossil fuels, not increase use or exploit new oil fields.

The planet is in environmental crisis. Please get your priorities right and say NO! I am totally against opening the Rose Bank oil reserve. Concentrate on finding investors for green energy and making financial profit out of that.

Thanks, []

R0106

Dear team:

I am writing, in my personal capacity, in response to the consultation. []

I am a citizen very concerned about climate change, and the implications for the United Kingdom. Specifically, I worry that emissions from Rosebank (including scope 3) will cause the UK and indeed the world to miss the Paris Agreement. The IEA has indicated that we do not need additional fossil fuels for the transition. If we miss the target, and the Atlantic Meridional Overturning Current or the North Atlantic Subpolar Gyre slow done, temperature in the UK and all of North West Europe will significantly decrease. This will undermine the UK economy, agriculture and society.

The Global Tipping Points Report 2025 by Prof Tim Lenton of Exeter University and others identifies a number of tipping points, such as the melting of the Greenland, west Antarctic, and east Antarctic ice sheets, the collapse of Atlantic Meridional Overturning Current (AMOC), Amazon forest dieback, permafrost melting leading to massive methane and CO2 emissions, and the disappearance of winter sea ice in the Arctic reducing the albedo effect. They find the effects would be severe:

> “Consequences of climate tipping would be severe and potentially include a global sea level rise of several metres, ecosystem collapse, widespread

> biodiversity loss, and substantial shifts in global heat redistribution and precipitation pattern”[1]
>
> “Harmful tipping points in the natural world pose some of the gravest threats faced by humanity. Their triggering will severely damage our planet’s life support systems and threaten the stability of our societies.” [2]

A number of these tipping points could happen even at or below 2oC warming – and we are already reaching the first point (coral reef die-off as a result of Ocean acidification).[3]

The collapse of the North Atlantic Subpolar Gyre and AMOC in particular would dramatically change European climate, and could occur in the next two decades.[4] A recent Utrecht University study on possible collapse of the Atlantic Meridional Overturning Current (AMOC) or “thermohaline circulation”, which determines the climate in North-West Europe and North-East America, finds:

> “The collapse time is estimated between 2037-2064 (10-90% CI) with a mean of 2050 and the probability of an AMOC collapse before the year 2050 is estimated to be 59 ± 17%.”[5]

Prof. Stefan Rahmstorf, physical oceanographer at Potsdam Institute for Climate Impact Research (PIK) in Germany, and leading climate scientist, noted that:

> “There is still large uncertainty where the AMOC tipping point is, but the new study adds to the evidence that it is much closer than we thought. A single study provides limited evidence, but when multiple approaches have led to similar conclusions this must be taken very seriously, especially when we’re talking about a risk that we really want to rule out with 99.9% certainty. Now we can’t even rule out crossing the tipping point in the next decade or two.” [6]

A slow down or collapse of the AMOC could lead to North-West Europe including the UK cooling to the same levels as Hudson Bay, Canada, affecting food supply very significantly.[7] This has worldwide implications. As the AMOC slows and northern areas cool, monsoons shift south, missing areas that depend on them for 90% of annual rain, impacting food and water security for 2 billion people.[8]

Because of the worldwide impact of this potentially imminent tipping point, 44 oceanographers from 15 countries called for urgent action in the face of the weakening circulation. They warn that the risk of collapse has been "greatly underestimated" and will have "devastating and irreversible impacts" for North-East America, NorthWest Europe, and indeed the world.[9]

In these circumstances, the UK cannot justify to begin development on the large Rosebank reserve, which would lead to significant emissions of CO2 at a time when the global priority must be to cut emissions urgently and dramatically. As outcomes failed in

Belem at COP30, the UK has an opportunity and a responsibility to do all it can to push these desperately needed emissions cuts here and around the world. We are saying the right things in the discussions at COP30, but we must accompany these statements with bold action, and show the leadership that the world needs to see. Developing Rosebank would show a blatant disregard for these efforts.

Rosebank should be stopped, and the funds proposed to support Rosebank development should be reallocated to clean energy (renewables, nuclear, geothermal) to guarantee clean cheap and secure energy for the UK.

With best wishes,

[]

[1] Moller, Rockström et al, Achieving net zero greenhouse gas emissions critical to limit climate tipping risks, Nature Communications 15, article 6192 (2024).

[2] Lenton, Exeter University, Global Tipping Points (2023), p. 10; Global Tipping Points Report 2025.

[3] Lenton et al, Global Tipping Points Report 2025. See also Armstrong McKay et al, Exceeding 1.5°C global w arming could trigger multiple climate tipping points (Science 2022) ("even global warming of 1°C, a threshold that we already have passed, puts us at risk by triggering some tipping points. This finding provides a compelling reason to limit additional warming as much as possible."); Planetary Health Check 2025. Rockstrom et al. Safe and just Earth system boundaries (2023) ("Seven of eight globally quantified safe and just ESBs and at least two regional safe and just ESBs in over half of global land area are already exceeded.").

[4] Global Tipping Points Report 2025 ("much harsher northwestern European winters, disruption of the West African Monsoon, decreased agricultural yield and marine ecosystem shifts").

[5] Smolders, Van Westen, Dijkstra, Probability Estimates of a 21st Century AMOC Collapse (2024); Van Westen, Vanderborght, Kliphuis, Dijkstra, Physics-Based Indicators for the Onset of an AMOC Collapse Under Climate Change (2025)

("An analysis consisting of 25 different climate models shows that the AMOC could begin to collapse by 2063 (from 2026 to 2095, 25th to 57th percentiles) under [a business-as-usual] scenario (SSP2–4.5), or by 2055 (from 2023 to 2076, 25th to 75th percentiles) under a high-end emission scenario (SSP5–8.5). When the AMOC collapses, the Northwestern European climate changes drastically and this will likely induce severe societal impacts"); Drijfhout, Angevaare, Mecking, van Westen, Rahmstorf, Shutdown of Northern Atlantic overturning after 2100 following deep mixing collapse in CMIP6 projections (2025) (37% chance that the tipping point (after which

collapse is inevitable) in a business-as-usual scenario will be in one or two decades, even without accounting for the further negative impact of fresh water from melting Greenland glaciers).

[6] Quoted in Byrd, Is an Atlantic Ocean current collapse imminent? (2023). See also 2025 studies listed in the pervious footnote, as w ell as Rahmstorf, Is the Atlantic overturning circulation approaching a tipping point? Oceanography (2024); P. and S. Ditlevsen, Warning of a forthcoming collapse of the Atlantic meridional overturning circulation (2023) ("We estimate a collapse of the AMOC to occur around mid-century under the current scenario of future emissions"). For some insightful graphics, see Zhong and Rojanasakul, How Close Are the Planet's Climate Tipping Points, New York Times, August 11, 2024. A few papers suggest that the tipping point is uncertain, delayed or limited: (1) Terhaar et al., Atlantic overturning inferred from air-sea heat fluxes indicates no decline since the 1960s (2025) is countered by Rahmstorf, The AMOC is slowing, it's stable, it's slowing, no, yes, ..., (2025) ("I do not believe that the new attempt to reconstruct the AMOC is more reliable than earlier methods ... which have concluded there is a weakening. ... And all agree that the AMOC will weaken in response to global warming in future and that this poses a serious risk..."). (2) The US NOAA Atlantic Oceanographic and Meteorological Laboratory suggests the collapse may be delayed, due to a "tug of war" between human-caused factors causing a slow - down between 1980 and 2010, and the natural phenomenon of the North Atlantic Oscillation. See Lee et al., A pause in the weakening of the Atlantic meridional overturning circulation since the early 2010s (2024). This may go on in the next few years, but importantly, the latter can reverse any time, in which case the slow-down will resume, and the former factor will grow stronger as emissions accumulate in the atmosphere. Moreover, melting of the Greenland ice sheet and land-based glaciers and ice caps in the Arctic circle is not adequately taken into account. (3) Baker, Bell, Jackson et al. in Continued Atlantic overturning circulation even under climate extremes (2025) argue that "Upwelling in the Southern Ocean, driven by persistent Southern Ocean winds, sustains a weakened AMOC in all cases, preventing its complete collapse," but does not take account of the deeper thermohaline part of the AMOC which w here the tipping point would occur, and "does not change the assessment of the risk and impact of future AMOC changes in response to human-caused global warming". Rahmstorf, How will media report on this new AMOC study? (2025). (4) Bonan, Observational constraints imply limited future Atlantic meridional overturning circulation weakening (2025). For a comprehensive rebuttal of these studies, see Rahmstorf, High-resolution 'fingerprint' images reveal a weakening Atlantic Ocean circulation (AMOC) (2025).

[7] Van Westen, Baatsen, European Temperature Extremes Under Different AMOC Scenarios in the Community Earth System Model (2025); for an insightful summary in lay-person's terms, see Mance, The utterly plausible case that climate change makes London much colder, Financial Times, January 11, 2025.

[8] The impacts are worldwide, since ocean currents are connected worldwide. See Sohail, Gayen, Klocker, Decline of Antarctic Circumpolar Current due to polar ocean freshening (2025) (the Antarctic Circumpolar Current, which links the Atlantic, Pacific, and Indian oceans, could slow down by 20% by 2050 in a high-emissions future); DiNezio et al., Tropical response to ocean circulation slow down raises future drought risk (2025) (discussing altering rainfall patterns as far as Indonesia, the tropical Andes and northern Australia).

[9] Open letter by Climate Scientists to the Nordic Council of Ministers, October 21, 2024.

Business Support Team
Offshore Petroleum Regulator for Environment and Decommissioning (OPRED)
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ
By email only: OPRED@Energysecurity.gov.uk

Dear Sir/Madam,

Ocean Alliance Against Offshore Drilling response to the updated environmental impact assessment and further supporting environmental information for the Rosebank Field Development.

The Ocean Alliance Against Offshore Drilling is a network of over sixty marine and nature NGOs, business and marine groups all united behind calls to end offshore oil and gas drilling in UK seas, to protect marine life and habitats and the communities that rely on thriving seas.

The alliance welcomes the opportunity to respond to the publication of the updated environmental impact assessment and other supporting environmental information for the Rosebank field. Our response focusses on the issues raised in the assessment of the project's scope 3 emissions and the further environmental information submitted by Equinor. It is clear that the project should be refused all further consents. The assessments make clear that the Rosebank oilfield will generate enormous greenhouse gas emissions and cause direct harm to marine ecosystems which already face a myriad of pressures.

The Rosebank field, as well as blowing a hole in the UK's net zero obligations and doing next to nothing for either energy security or energy prices, is already causing significant damage to marine ecosystems, even before full production. It is extremely disappointing in particular to see from the updated information that the gas export pipeline has been constructed through the Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area (MPA), despite this MPA being in unfavourable condition, and that justification for this work is based on evidence from 2014. The Joint Nature Conservation Committee (JNCC) have since surveyed this site and made strong recommendations to protect the MPA from seabed damage from bottom towed fishing gear in 2024, reflecting its sensitivity to disturbance.

Approval of this project would deeply undermine the UK's global and domestic credibility and leadership on tackling the climate and biodiversity crises and signal that the UK Government is prioritising the profits of private oil and gas companies over

the future of the planet and the just transition of communities and workers to a clean and green energy future.

KEY MESSAGES

1. The greenhouse gas emissions are significant, and production would be incompatible with safe climate limits

The Equinor assessment estimates that this project could produce 254 million tonnes of carbon dioxide equivalent ($MtCO_2e$) over its lifetime, including 249 $MtCO_2e$ in downstream scope 3 emissions. This is a significant increase on previous estimates.

It is completely incorrect for Equinor to conclude these emissions are not significant and will not impact on climate change. The claim that the potential emissions would be insignificant if the rest of the world can keep on track with Paris Agreement targets is deeply flawed. There is widespread consensus that the world is not currently on track to achieve Paris Agreement targets. 2024 has been confirmed as the first year when global temperatures exceeded 1.5°C relative to pre-industrial levels, with multiple sources agreeing that surface air temperature reached 1.55°C warming in 2024.[1] In the run up to COP 30 many countries have yet to submit their climate action plans (NDCs). It is the UN's assessment that we have overshot 1.5°C and the Paris targets.[2] The UK also has its own, legally binding emissions targets to meet. Every contribution to warming will therefore make a significant difference, and a large project like this will add to emissions over future decades, taking us beyond 2050.

If the Secretary of State accepts Equinor's conclusion that this project will not have a significant climate impact and approves the oilfield, it would undermine decades of climate action and leadership in the UK. We strongly urge the government to reject this assertion.

2. Equinor have not – and cannot - produce any mitigation measures for the scope 3 emissions climate impact of the project

Equinor conclude that their downstream scope 3 emissions will not have a significant adverse effect on the environment because the impacts of the use of the oil and gas produced is not within their control. Equinor therefore do not think it is necessary to outline any mitigation measures for the scope 3 emissions. However, the requirement to assess scope 3 emissions, as dictated by the UK Supreme Court in the *Finch* ruling,[3] is testament to the fact that oil and gas exploration is indisputably the cause of emissions that do impact the global climate. These emissions are impossible to mitigate due to their scale and the global nature of their impacts. In the case of this consent decision, the only course of action that truly protects the climate, both globally and domestically, is to stop the field from being developed.

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[1] E. Bevacqua, C.-F. Schleussner, J. Zscheischler, 2025. A year above 1.5 °C signals that Earth is most probably within the 20-year period that will reach the Paris Agreement limit, Nat. Clim. Change 15 262–265. https://doi.org/10.1038/s41558-025-02246-9.

[2] J. Watts, W. Xipai, 'Change course now': humanity has missed 1.5C climate target, says UN head, The Guardian (2025). https://www.theguardian.com/environment/2025/oct/28/change-course-now-humanity-has-missed-15c-climate-target-says-un-head (accessed October 28, 2025).

[3] *Finch v Surrey County Council* [2024] UKSC 20 (*Finch*).

3. **Climate impacts on the marine environment have not been adequately assessed**

Very little consideration is given to the effects of climate change on the marine environment. There is a large body of evidence on the impacts of climate change on the UK's marine environment[4,5,6] and on future global impacts as increased greenhouse gas emissions drive rising sea surface temperatures, marine heatwaves, ocean chemistry changes and increasingly unpredictable and extreme weather,[7] all of which are relevant to this updated assessment.

Climate impact and marine environmental damage are not two separate issues; climate change impacts directly on the marine ecosystems being assessed and exacerbates other drivers of degradation. Climate change also reduces the capacity of the marine environment to mitigate and adapt to climate change. These interacting impacts are not explored.

4. **The direct impact on the marine environment inside and adjacent to the Rosebank oilfield is significant and should lead to rejection of consent**

The revised assessment of the wider environmental impacts concludes (as the original environmental statement did) that the environmental impact of the Rosebank Development 'arising from known and expected activities' is not significant. Yet the wide-ranging impacts of offshore oil, from survey to decommissioning, are well-documented, and should be clear reasons to refuse consent.

There are many ways in which the development could significantly impact on the local and regional marine environment, particularly in combination with climate impacts, including:

- Direct physical damage, degradation, and loss of seabed habitats
- Chronic pollution, including routine use of toxic chemicals and small oil spills.
- Noise pollution and disturbance of marine mammals.

Further details of these marine impacts are covered in Sections 5-9 below.

5. **Priority marine habitats including sponge communities, cold water corals and offshore deep-sea muds are at significant risk from this development**

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[4] Pinnegar, JK, Garrett, A, Wouters, J, Kelly, R, Stiasny, MH, Marshall, CT, Pinnegar, J.K., Garrett, A., Wouters, J., Kelly, R., Stiasny, M.H. & Marshall, C.T. 2023. Climate Change Impacts on Commercial and recreational Fisheries Relevant to the UK and Ireland. MCCIP Science Review 2023., Marine Climate Change Impacts Partnership https://www.mccip.org.uk/sites/default/files/2023-10/Impacts%20on%20Commercial%20and%20Recreational%20Fisheries%20Relevant%20to%20the%20UK%20and%20Ireland.pdf

[5] Fox, C.J., Marshall, C., M.H. Stiasny, Trifonova, N., 2023. Climate Change Impacts on Fish of Relevance to the UK and Ireland. MCCIP Science Review 2023., Marine Climate Change Impacts Partnership https://www.mccip.org.uk/fish

[6] Evans, P.G.H. and Waggitt, J.J. 2020. Impacts of climate change on marine mammals, relevant to the coastal and marine environment around the UK (MCCIP Science Review 2020), Marine Climate Change Impacts Partnership. https://research.bangor.ac.uk/portal/files/37579599/EvansWaggitt_MCCIP1_Publication.pdf

[7] McCarthy, G., Graham, J., Hermanson, L., Hodge, K., Moat, B., Moffa-Sanchez, P., Petit, T., and Robson, J., 2025. Climate change impacts on ocean circulation relevant to the UK and Ireland, MCCIP Ocean Circ. Rev. (2025)

We fundamentally disagree with the continued assertion in the environmental statement that protected MPA and Priority Marine Feature (PMF) features are not at risk from this development.

The project requires a new gas export pipeline to be built through an area of the Faroe-Shetland Sponge Belt MPA which is known to have unique and locally specific sponge aggregations, with two sites with sponge aggregations being found on the pipeline route in Equinor's surveys. This has already been built in the full knowledge that full consent to operate is still outstanding. Sponge aggregations are a Vulnerable Marine Ecosystem (VME)[8] and an OSPAR Threatened and/or Declining Habitat.[9] They are very sensitive to development[10] and can take a long time to recover from impacts.[11] The oilfield site itself includes offshore subtidal sands and gravels and offshore deep-sea muds, both categorised as Scottish PMFs.

Other VME indicator species are found within and adjacent to the Rosebank site, including cup corals, sea pens, soft corals and gorgonians.[12] Coral habitats were recorded in Equinor's surveys within the oilfield site which could qualify as OSPAR priority habitat but a technicality around the definition of a coral garden is used to dismiss their importance.

6. **The impact on the Faroe-Shetland Sponge Belt MPA in particular will be significant and is unacceptable given its unfavourable status**

The IUCN guidelines on MPAs are very clear that no oil and gas development or associated infrastructure is appropriate in an MPA.[13]

Whilst the oilfield itself is not within the Faroe-Shetland Sponge Belt MPA, it is close to the northern boundary and as the new information shows, the pipeline has already been constructed through part of the MPA, travelling through the zone of the MPA now protected from mobile fishing gear and also the zone now protected from mobile and static gear. It is extremely disappointing that this pipeline was allowed to go ahead, through an MPA already regarded as being in unfavourable condition, despite overall consent to operate not having been secured. This in our view represents a material change in the baseline environmental state that undermines the wider conclusions of the assessment.

This additional protection gives the Faroe-Shetland Sponge Belt MPA a relatively high level of protection from bottom towed fishing, allowing the recovery of benthic species and habitats from fishing impacts. However, the impacts from the Rosebank

[8] FAO, Report of the Technical Consultation on International Guidelines for the Management of Deep-sea Fisheries in the High Seas., Food and Agriculture Organisation, Rome, 2009.
[9] OSPAR Commission, List of Threatened and/or Declining Species & Habitats, OSPAR Comm. (2008). https://www.ospar.org/work-areas/bdc/species-habitats/list-of-threatened-declining-species-habitats (accessed October 11, 2022)
[10] Jones DOB, Ian R. Hudson, Brian J. Bett, 2006. Effects of physical disturbance on the cold-water megafaunal communities of the Faroe–Shetland Channel, Mar. Ecol. Prog. Ser. 319 43–54
[11] Jones DOB, Gates AR, Lausen B. 2012. Recovery of deep-water megafaunal assemblages from hydrocarbon drilling disturbance in the Faroe–Shetland Channel, Mar. Ecol. Prog. Ser. 461 71–82
[12] ICES, A suggestive list of deep-water VMEs and their characteristic taxa, ICES, 2020. https://www.ices.dk/data/Documents/VME/VMEs%20and%20their%20taxa.pdf
[13] Day, J., Dudley, N., Hockings, M., Holmes, G., Laffoley, D., Stolton, S., Wells, S., Wenzel, L., eds. 2019. Guidelines for applying the IUCN protected area management categories to marine protected areas., IUCN, Gland, Switzerland

development will add to existing oil and gas infrastructure in the MPA, increasing the multiple impacts on the conservation features and the wider marine ecosystem. Given the welcome investment made in protecting the MPA from fishing impacts, it is counterproductive and undermining to then approve an oil development that will not only directly impact on the MPA, but also exacerbate climate change impacts on marine ecosystems.

In JNCC's advice on that site in relation to fisheries that recommended a full exclusion of bottom towed fishing gear, they note that "As our evidence-base improves, there is potential that we identify further records of deep-sea sponge aggregations in habitat considered suitable for colonisation (namely between the 400–600 metre depth contour in each site)".[14] This is worth noting as the revised environmental statement states that these only occur in a much narrower band at 500m, which dates back to a JNCC report from 2014.

7. **The routine pollution impacts associated with an oilfield of this size will impact on the marine environment and have already started**

The insidious threat of chronic oiling to marine ecosystems in UK waters is well documented.[15] A large oil development of this nature is expected to release many tonnes of oil in chronic oiling and small accidental spills over its lifetime. However, Equinor assessed the likely volume and content of accidental discharges and concluded that the impacts would be insignificant. We do not believe this to be the case, particularly when considering that this additional pollution will add to existing chronic oiling from many other oilfields and the wider pressures of marine pollution in the region, impacting on many elements of the ecosystem. For example, the Faroe-Shetland Channel is important for cetaceans, including fin whale, sei whale, minke whale, humpback whale, sperm whale, northern bottlenose whale, long-finned pilot whale, blue whale, beaked whale and orca. All these species will be susceptible to ingesting or otherwise absorbing small quantities of oil when surfacing or through their food sources, leading to well-documented impacts on individuals and populations.

Furthermore, in addition to the damage caused by the construction of the gas export pipelines, accidental spills and leaks at the Rosebank site have already started. Two separate spills have already been documented in 2025 from vessel operations and other activities, even before major drilling operations have begun.[16]

8. **The risk of a major spill is unacceptable and would cause serious damage to Vulnerable Marine Ecosystems, numerous MPAs and endangered and protected species**

The environmental statement acknowledges that the biggest risk from any offshore development is the potential for a large oil spill. However, the impact of a spill is dismissed because it is assessed as unlikely and a rare event. The worst-case scenario is

[14] JNCC. 2025. JNCC's response concerning proposed fisheries management measures for offshore MPAs in Scotland (October 2024). Available at https://data.jncc.gov.uk/data/9c17e159-8ffd-412e-a849-b3b459e04633/Scottish-fisheries-management-proposals-JNCC-response.pdf (Accessed 3 November 2025)
[15] Oceana in the UK, 2024. Sea Slick: The True Scale And Impact Of Chronic Oil Pollution In UK seas. DOI number: 10.5281/zenodo.13684166
[16] UK Government. 2025. UK Energy Portal, PON1 database notifications 7844 and 7588. Available at https://itportal.energysecurity.gov.uk/irs/publications/pon1 (Accessed 3 November 2025)

a well blow-out which would result in large volumes of oil being released into the environment and impacting on a very wide area of sea and coast. Oil from a blow-out at Rosebank could severely impact on at least 29 protected sites and many iconic conservation species including otters, seals and a wide range of seabirds. Seabirds are particularly vulnerable to oil spills and some seabird populations that would be vulnerable to spills from the Rosebank oilfield operations have already been badly impacted by avian influenza, e.g. the great skua.

9. **The project will impact on blue carbon and the wider capacity for the marine environment to mitigate/adapt to climate change.**

Habitats within the footprint of the proposed development include those of high blue carbon value. MPAs in the vicinity of the proposed oilfield were assessed for their blue carbon potential and were found to be responsible for large quantities of carbon storage and accumulation.[17] However, the impacts of the development on blue carbon have not been specifically assessed. Scottish seabeds represent by far the most important set of habitats for carbon storage in Scotland, and indeed the area covered by the Rosebank field and associated infrastructure represents some of the densest quantities of organic and inorganic blue carbon in Scottish and UK seas.[18]

There are many potential risks to blue carbon habitats from the construction and operation of the site. The impacts of a large oil spill would affect many important marine and coastal blue carbon habitats, but this risk is not assessed. It has been recommended that a precautionary approach should be taken to manage these critical blue carbon habitats.

Conclusion

For the reasons above, we urge the government in the strongest possible terms to reject the updated environmental impact assessment and supporting information, and make it clear that it will refuse consent for the Rosebank field to go ahead.

The following organisations and individuals have signed onto this response to the consultation:

[redacted]

[17] M. Burrows, C. Smeaton, H. Tillin, S. Grundy, H. Sugden, P. Moore, C. Fitzsimmons, W.B. Austin, A. O'Dell, 2024. The United Kingdom's Blue Carbon Inventory:: Assessment of Marine Carbon Storage and Sequestration Potential in Scotland (Including Within Marine Protected Areas): A Report to The Wildlife Trusts, WWF and the RSPB., Scottish Association for Marine Science, Oban.
[18] ibid

[redacted]

R0108

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“My response to the call for public comment on the Rosebank Field Development []

I refer to documents published by HM Government in the Rosebank Field Development Project Summary at www.gov.uk/government/publications/rosebank-field-developmenthttps://www.gov.uk/government/publications/rosebank-field-development especially

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,

and

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

In summary: Approving Rosebank is like pouring petrol onto a burning fire, there is no monetary benefit overall to the UK, UK energy prices will not be reduced, but UK citizens and taxpayers will still have to pay the costs of mitigating any impact of Rosebank’s emissions. For jobs we would be better off to press ahead now with a transition to new economy jobs than to lose impetus by resourcing (and funding) a new fossil fuel development.

Whereas not approving Rosebank avoids a taxpayer loss on Rosebank, and while we will still have to mitigate existing emissions we will not have the additional cost of mitigating Rosebank’s addition to the problem. Our energy prices will be unaffected.

It seems lunacy to approve Rosebank – it is all downside for the UK.

This is substantiated by what Equinor says in the Response documents.

The total emissions of greenhouse gases, including downstream scope 3 emissions is expected to be more than 250 million tonnes of CO2 equivalent.

Equinor argues that that makes an insignificant impact on the acknowledged climate change and on the size of the commitments made and needed to stabilise the climate. (Requirement #1, Non-technical summary section 1.7).

Further that no mitigation is possible by Equinor (Requirement #1, Non-technical summary section 1.8)

To argue that an increase in GHG emissions is insignificant in its impact on the current reduction plans is akin to saying that pouring a few hundred litres of petrol onto a raging

fire makes no difference – the fire is still raging, and it's still a big job to extinguish it. Any firefighter would be appalled at such behaviour, and we should be equally appalled by Equinor's specious and self-serving argument.

The challenge for us all in fighting climate change is that a large reduction in greenhouse gas emissions is required, and this is in no way helped by any additional emissions planned. In fact, just like fighting a fire, removal of fuel is critical to gaining control. In such a context even an incremental addition of greenhouse gas emissions is best avoided. It's reckless to add even what Equinor believes to be an insignificant amount, (but which is in fact more than 250 million tonnes of CO2 equivalent) and subsequently attempt to remove that same amount from the atmosphere. Prevention is often better than cure and certainly is in this case.

Equinor further notes that there is no mitigation for the inevitable emission of greenhouse gases from the products of the Rosebank field (Requirement #1, Non-technical summary section 1.8), making it even more imperative to prevent the emissions in the first place.

Economically, Equinor seeks to benefit from the Rosebank development while pushing all of the costs onto others. They will receive support from the UK tax payer through the system of tax breaks and investment allowances, which when netted against tax payments (in the future) still leaves the UK tax payer over £250 million out of pocket according to a WWF Norway analysis. Meanwhile Norwegian owned Equinor is expected to make £1,500 million profit (at a $70/barrel oil price). This imbalance is without costing the externalities also largely borne by the public and not by Equinor of the costs of removing the greenhouse gases emitted as a result of Rosebank, and of the increased costs due to extreme weather damage, flooding, drought, impact to agriculture, health and so on. Insurance companies are already reporting additional hundreds of millions of Pounds in payouts because of weather-related damage in the UK alone. Even an incremental increase is a very significant cost.

It's in this context that Equinor's claim of insignificance for emissions from Rosebank should be viewed. In a further analogy, a 200 litre bathtub already containing 195 litres of water is in imminent danger of overflow from the addition of an "insignificant" further few litres. The point here is not necessarily that an "overflow" is about to happen (no one knows this), but that we know of many situations where changes that may have been insignificant a while ago are now not. 250 million tonnes of CO2 equivalent emissions that can be prevented is no longer insignificant in any sense.

Is there some benefit to the UK as well as to Equinor that might offset the harm? It's hard to see one. Rosebank's oil will be exported (and, according to Equinor in Requirement #3 paragraph 1.9, re-imported as higher cost products. This argues for a faster transition away from fossil fuels.), any tax paid will not even offset the support the taxpayer has

provided for development, UK energy prices will not be affected, North Sea jobs will still go away (even Equinor acknowledges that).

Hence my summary: Approving Rosebank is like pouring petrol onto a burning fire, there is no monetary benefit overall to the UK, UK energy prices will not be reduced, but UK citizens and taxpayers will still have to pay the costs of mitigating any impact of Rosebank's emissions. For jobs we would be better off to press ahead now with a transition to new economy jobs than to lose impetus by resourcing (and funding) a new fossil fuel development.

Whereas not approving Rosebank avoids a taxpayer loss on Rosebank, and while we will still have to mitigate existing emissions we will not have the additional cost of mitigating Rosebank's addition to the problem. Our energy prices will be unaffected.

It seems lunacy to approve Rosebank – it is all downside for the UK."

Thank you for your consideration, this does not require a response.

Best wishes

[]

R0110

By email to OPRED@Energysecurity.gov.uk

Business Support Team

Offshore Petroleum Regulator for Environment & Decommissioning

Department for Energy Security and Net Zero, AB1 Building, Crimon Place, Aberdeen AB10 1BJ

Dear OPRED Business Support Team,

Consultation reference number ES/2022/001

The above application must be turned down by the government. To do otherwise would be incompatible with recent court decisions, including the **ruling of the Court of Session in Edinburgh (January 2025) that *"The public interest in authorities acting lawfully and the private interest of members of the public in (not exacerbating) climate change outweigh the private interest of the developers".*** This statement cannot be reversed by a new application from the developers.

The verdict in the European Court of Human Rights (EctHR) in 2024, in the case brought and won by the group of older women from Switzerland, is equally applicable in UK (and to all 46 members of the Council of Europe) since their government's inaction on

climate was determined to be in breach of their human rights. Also, the International Court of Justice in July 2025

made clear that the established legal duty to do no harm is binding on all governments, including the UK. And, the Good Law Project & Tipping Point's case lodged recently argues that, to avoid breaching our human rights, our government has a legal duty to do more to tackle the climate crisis; this includes doing our 'fair share' globally to keep below 1.5C, and adequate legislation to stop new oil & gas emissions – commencing with refusing to allow Rosebank and other oil and gas fields to be developed.

The developer's claim, furthermore, that nearly 250 million tonnes of harmful Greenhouse Gas (GHG) emissions are "not significant" (paragraph 1.7.2 for example) is a misuse of the English language, and their revised submission regarding Scope 3 Emissions should be rejected as inadequate, in the face of the considerable damage that will be caused to the planet.

The part of the sea covered by the Rosebank application is adjacent to a marine protected area, that is home to many endangered and threatened species of dolphins, whales and fish. If the application is not rejected, the loud drilling, seismic blasting, and construction work could disrupt the behaviour and even cause deaths amongst these species. Despite the developer's efforts to prevent any occurrence of spillage, a major oil spill would have catastrophic impacts. And the oilfield's pipeline would cut through a specially protected seabed which could harm clams - that are some of the oldest animals on the planet.

I support the points made in the Open Letter to the Prime Minister on 6th November 2025, regarding why the Rosebank Oil field should not be developed. In order to avoid duplication, I have copied this below, as it forms part of my response.

Would you please acknowledge receipt of this submission?

Yours faithfully,

[]

"6th November 2025

Dear Prime Minister,

We, the undersigned, are writing to urge your government to reject the controversial Rosebank oil field.

Rosebank is a defining test of this government's credibility on climate change. This enormous oil field would produce more CO2 than the annual emissions of the 700 million people living in the world's poorest countries produce in a year.

Rosebank's vast emissions make it incompatible with UK climate commitments. The scientific evidence [1] is clear that there is no room for new North Sea oil and gas projects if we are to stay within the thresholds set out in the Paris Agreement, to which the UK is a signatory.

Beyond this, Rosebank is a very bad deal for the UK – it won't lower bills and would do almost nothing to boost energy security, given that most of it is oil destined for export. Its minimal gas reserves [2] have the potential to cut our gas import dependency by, on average, just 1% a year (under the most favourable conditions and if no gas is exported).

Worse, Rosebank could lead to a net tax loss [3] of over £250 million to the UK Treasury thanks to the enormous tax breaks for new drilling in the UK. This is economic lunacy, when the field's owners Equinor and Ithaca would earn an estimated £1.5 billion in profit, most of which would go to the Norwegian state, Equinor's majority owners.

More worrying is that, if approved, Rosebank could see nearly a quarter of a billion [4] pounds flow to a company that is contributing to human rights violations in the occupied Palestinian territory. Delek Group, which operates in illegal Israeli settlements and is known to provide fuel to the Israeli military, is the majority-owner of Ithaca Energy, Rosebank's co-owner. Delek Group is on the UN database [5] of companies involved in business activities that give rise to human rights violations against Palestinians.

In the midst of a climate crisis that is already bringing record heat, wildfires, flooding and drought to the UK and beyond, this Labour government must not cave into the pro-oil and gas agenda of politicians who doubt the science of climate change and want to hold back our renewable energy industry and its thousands of jobs.

Your government has rightly committed to prioritising clean energy and a fair transition for workers and communities. Approving Rosebank risks sending contradictory signals to investors, undermining the confidence and capital needed to deliver the UK's clean power goal, locking us into more high-carbon infrastructure, and undermining the UK's reputation for climate leadership, which is more vital today than ever.

Prime Minister, this is your government's opportunity to show the UK – and the world – that it will put people and the planet before polluters' profits.

We call on your Labour government to do the right thing and reject Rosebank."

Stop Rosebank

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[1] https://www.upliftuk.org/post/new-north-sea-oil-and-gas-fields-incompatible-with-paris-climate-goals

[2] https://www.upliftuk.org/post/why-trump-is-wrong-on-north-sea-oil-and-gas

[3] https://www.scotsman.com/news/politics/rosebank-oil-treasury-tax-receipts-north-sea-5184881

[4] https://www.thenational.scot/news/24654817.idf-linked-firm-receive-millions-rosebank-field-north-sea/

[5] https://www.ohchr.org/en/documents/thematic-reports/ahrc6019-database-all-business-enterprises-involved-activities-detailed

R0111

To: Business Support Team, Offshore Petroleum Regulator for Environment & Decommissioning, Department for Energy Security and Net Zero, AB1 Building, Crimon Place, Aberdeen AB10 1BJ.

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Proposed Rosebank Consent: ES/2022/001

I am most concerned about the proposal to grant consent to Equinor and their partners to extract oil from the Rosebank field 130kms north west of Shetland.

I strongly urge you NOT to grant consent on the following grounds:

1. Incompatibility of the Rosebank Development With UK Climate Commitments

Scientific consensus indicates that governments must refrain from approving new oil and gas projects if global warming is to be limited to 1.5°C. The proposed Rosebank development is not aligned with the United Kingdom's climate obligations and would significantly increase national greenhouse-gas emissions, contributing to climate instability and exacerbating the risk of certain regions becoming uninhabitable. The projected emissions from Rosebank's oil and gas output exceed the annual carbon emissions of the 28 poorest countries combined.

2. Potential Flow of Profits to a Company Operating in Illegal Settlements

Ithaca Energy, the company behind the Rosebank and Cambo developments, is majority-owned by the Delek Group. The United Nations has listed the Delek Group among entities involved in activities that support and benefit from the establishment and expansion of Israeli settlements in the Occupied Palestinian Territory. Accordingly, there is a significant risk that profits derived from North Sea resources indirectly benefit a company associated with such illegal activities, a situation that raises serious ethical concerns.

3. No Impact on Domestic Energy Prices and Security

Because oil and gas prices are determined on global markets, increased domestic production does not translate into lower household energy costs. 90% of the hydrocarbons expected to be extracted from Rosebank consist of oil, which is likely to be exported. Consequently, the project does not materially enhance the United Kingdom's energy security—an assessment acknowledged by the last government.

4. Inadequacy of New Oil Fields in Addressing North Sea Employment Decline

Employment in the North Sea oil and gas sector has halved over the past decade. The development of new fields such as Rosebank will not reverse this structural trend and would merely postpone the necessary transition toward a sustainable energy system. A rapid expansion of renewable energy infrastructure— accompanied by domestic manufacturing and supply-chain development—represents the most effective strategy for creating long-term, high-quality employment.

5. Environmental Risks to a Nearby Marine Protected Area

Rosebank is located adjacent to a designated Marine Protected Area that provides critical habitat for endangered and vulnerable species, including several types of dolphins, whales, and fish. Activities associated with the project—such as drilling, seismic surveying, and pipeline construction—pose substantial risks, including behavioural disruption and potential mortality. A major oil spill would have severe ecological consequences extending to neighbouring states. Furthermore, the proposed pipeline route traverses a specially protected seabed area containing ancient clam species, which would be adversely affected.

6. Significant Financial Burden on the UK Public Through Tax Reliefs

Under the current fiscal regime, the majority of Rosebank's development costs would be recoverable by Equinor and Ithaca Energy through extensive tax relief provisions. As a result, the UK public would effectively subsidise the project by providing several billion pounds in tax benefits to its operators. This occurs despite Equinor—Britain's largest gas supplier—reporting record profits while many households face acute difficulties in meeting energy costs.

Please bring these concerns to the attention of the Secretary of State when they are considering the revised application by Equinor.

Hoping that sense prevails

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R0112

Dear Secretary of State,

I object very strongly to the development of the Rosebank oil field.

The project has been bounced around for too long. Every sane person knows that new drilling for oil is completely incompatible with a secure future for us all. Extreme weather events are affecting us now in the UK; the climate crisis is banging on our door.

Rosebank also will not provide energy security given that it will be sold on the market and at prices we don't determine. The UK government should be pushing for sustainable choices.

Please do not greenlight Rosebank.

Regards,

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R0113

If, as Equinor claim, the scope 3 emissions from this project (from the burning of the hydrocarbons extracted) are not significant in the context of total UK emissions, so, logically, is the amount of hydrocarbons to be extracted. Approval of this project would be analogous to the alcoholic saying "I'll just have this one last drink".

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R0114

Dear Mr Miliband,

I am writing to you in regards to the public consultation for the Rosebank Field Development 'ES/2022/001'.

I completely disagree with this project and stand vehemently against it going ahead.

The new laws which required scope 3 emissions be published this time around reveal not only the manipulative dishonesty of Equinor in its first application but also just how significant the climate impact will be. The new figure of nearly 250million tonnes of carbon over the field's lifetime is *"more than 50 times greater than the original figure of 4.5 million tonnes it gave from extracting the oil and gas"* and in **Equinor's own report** ? they conclude that this will have a **high risk impact on climate...**

"Conclusion on Assessment of Significance

6.5.5 As set out in section 6.2, the Downstream Scope 3 Emissions associated with the Rosebank Development are assessed as having a likely impact on climate. The sensitivity of the climate receptor is considered to be "high" (section 6.3.3)."

?We have seen deeply disturbing papers published recently on tipping points. The first discovering that the Arctic Meridional Overturning Circulation has a worrying likelihood of collapsing this century https://iopscience.iop.org/article/10.1088/1748-9326/adfa3b (this is significant to me as I am only 21 so this could be within my lifetime and definitely mychildrens') The second showing we have already crossed the tipping point for coral reefs https://www.sciencedirect.com/science/article/abs/pii/S0262407925016926. We are only at 1.5 degrees of warming and the climate system is collapsing.

The uncertainty in climate models seen earlier this century is being corrected now, and the most recent research shows we have badly **underestimated** the severity of warming and the sensitivity of tipping points and that we need an **even more rapid decarbonisation** approach so as to avoid catastrophic **socioeconomic fallout**.

And regarding Equinor's empty promises on decarbonisation, Client Earth has found that "*Equinor has not reduced its annual Scope 3 emissions. In fact, they have slightly increased*[1] *since 2015, to 247 million tonnes CO2 equivalent in 2019 and 250 million tonnes CO2 equivalent in 2020*" and continue to do so annually.

This country's infrastructure, food security, border security, healthcare etc **cannot** survive significant climate disruption. Please **do not approve** the Rosebank Field; it is economic and societal suicide to do so.

I hope you take my opinion into serious consideration as part of this consultation.

Kind Regards,

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[1] https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjSm-Sk8b2TAxV4V0EAHTVMIlMQFnoECB0QAQ&url=https%3A%2F%2Fwww.equinor.com%2Fcontent%2Fdam%2Fstatoil%2Fdocuments%2Fsustainability-reports%2F2020%2Fequinor-sustainability-report-2020-LR.pdf&usg=AOvVaw2NGPoVR9sSAqZ6ZRjDQt5j&opi=89978449

Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
By email: OPRED@Energysecurity.gov.uk

20 November 2025

Representation from the Weald Action Group regarding the Rosebank Oilfield Development Project (reference: ES/2022/001)

The Weald Action Group[1] is a collaboration of community groups and campaigners against all forms of oil and gas extraction across the Weald and the south-east of England.

We, with Sarah Finch as the claimant, initiated the judicial review of the Horse Hill onshore oil development, (Finch v. Surrey County Council ('*Finch*'),[2] which led to the June 2024 Supreme Court judgment on the requirement to include downstream scope 3 impacts in environmental assessment for fossil fuel developments.

It was as a direct result of our success that the Court of Session ruled that the previous consent for the Rosebank development was unlawful, and that Equinor and Ithaca Energy have had to submit new further information regarding an assessment of the climate effects of scope 3 emissions. We welcome this further opportunity to comment on this project.

Overview

The latest Global Carbon Project budget shows that CO_2 emissions from fossil fuels will reach record highs of 31.8 gigatonnes (Gt) this year and that the remaining carbon budget to have just a 50% chance of limiting global average temperature rise to 1.5°C – 170 Gt CO_2, equating to just four years of today's emissions – is virtually exhausted[3].

This budget is dwarfed by the 915 Gt CO_2 forecasted emissions from the burning of the oil, gas and coal in already operating or under development fossil fuel-producing infrastructure. Indeed, under the Paris Agreement aligned emissions pathways, research shows that close to 60% of fossil fuels in active fields and mines must now remain in the ground[4].

[1] https://www.wealdactiongroup.org.uk/

[2] R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council and others [2024] UKSC 20. https://www.supremecourt.uk/cases/uksc-2022-0064

[3] Global Carbon Project. (2025). Supplemental data of Global Carbon Budget 2025 (Version 1.0) [Data set]. https://www.icos-cp.eu/science-and-impact/global-carbon-budget/2025 as reported here: Zeke Hausfather and Perre Friedlingstein, 'Fossil-fuel CO_2 emissions to set new record in 2025, as land sink "recovers"', *Carbon Brief*, 13 Nov. 2025. https://www.carbonbrief.org/analysis-fossil-fuel-co2-emissions-to-set-new-record-in-2025-as-land-sink-recovers/

[4] Oil Change International, *Sky's Limit Data Update*, 2023, https://www.oilchange.org/wp-content/uploads/2023/08/skys-limit-data-update-2023-v3.pdf

The science is clear[5]. If we are to have even the slightest chance of avoiding the very worst impacts of climate change there can be no new fossil fuel developments.

And we now have an authoritative legal opinion regarding the obligations of states in respect of climate change. Earlier this year the International Court of Justice[6] confirmed that the duty of States to prevent activities from causing significant harm to the environment and to act with due diligence applied to the climate system. Failure to prevent such activities – such as through the continued allowance of fossil fuel exploration, production, consumption or subsidies – may constitute an internationally wrongful act.

If the Rosebank oilfield development goes ahead it will cause significant harm to the climate system. There can be no doubt. The UK government must act with due diligence. It must not approve this development. To do otherwise ignores the scientific consensus that new fossil fuel projects are incompatible with the 1.5°C target, runs counter to the government's new objective for the North Sea, "*to take a globally standard-setting, 1.5°C and climate science-aligned approach to future oil and gas production*"[7] and puts the UK at legal risk.

Equinor's attempt to show that the Rosebank oilfield development will not cause significant harm to the climate is deplorable. This is discussed in the following section.

Specific comments on the further information provided by Equinor regarding its assessment of the effects of the Rosebank Development's Downstream Scope 3 Emissions on the climate[8]

1. Failure to acknowledge the critical state of the climate

- As per the government's EIA scope 3 supplementary guidance,[9] determination of the baseline should include "*A realistic and reasonable description of the current state of the environment*". Equinor fails to do this.
- For example, their assessment includes statements such as, "*Global climate systems have responded to the increase in CO_2 emissions through an increased uptake of CO_2 within the oceanic and terrestrial environments e.g. carbon sinks*" (para. 1.4.7). This is simplistic and

[5] E.g. *Navigating Energy Transitions Mapping the road to 1.5°C*, International Institute for Sustainable Development, 2022. https://www.iisd.org/system/files/2022-10/navigating-energy-transitions-mapping-road-to-1.5.pdf; Greg Muttitt, Fergus Green and Steve Pye, *The Climate Implications of New Oil and Gas Fields in the UK – An overview of the evidence*, UCL, June 2025. https://www.ucl.ac.uk/policy-lab/sites/policy_lab/files/report-climate_implications_pages_online.pdf

[6] International Court of Justice, Advisory Opinion on the Obligations of States in respect of Climate Change, 7 July 2025. https://www.icj-cij.org/case/187

[7] Department for Energy Security & Net Zero, B*uilding the North Sea's Energy Future: Consultation*, March 2025. https://assets.publishing.service.gov.uk/media/67d0005ed107f3a16e028796/building-the-north-sea-energy-future-consultation.pdf

[8] Equinor, *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*, 2025. https://assets.publishing.service.gov.uk/media/68ef61fd82670806f9d5e0a9/Rosebank_Reg_12__1__Assessment_of_Scope_3_Emissions__OPRED_131025__errors_corrected.pdf

[9] Department for Energy Security and Net Zero, *Environmental Impact Assessment (EIA) – Assessing effects of downstream scope 3 emissions on climate*, June 2025. https://assets.publishing.service.gov.uk/media/6853fa3d1203c00468ba2b15/Supplementary_guidance_-_Effects_of_Scope_3_Emissions.pdf

misleading. Due to our warming planet, natural carbon sinks – the forests, soils and oceans – are taking up fewer emissions than expected and are now reaching critical limits[10].

- Para. 3.2.12 states, "*Forster et al. (2025) estimate that from the beginning of 2025, the remaining carbon budget to maintain warming levels to below 1.5°C with >50% probability is 130 GtCO2eq*". Equinor does not contextualise this stark warning. 130 Gt CO_2eq equates to just three years of emissions at current levels[11].
- Equinor acknowledges that, "*These [emissions] trends indicate that atmospheric concentrations of CO_2, CH_4 and N_2O are increasing"* (p3.3.2). Several emission scenarios (Shared Socio-economic Pathway (SSP) narratives combined with Representative Concentration Pathways (RCPs)) are then presented (Table 4, page 24) but there is no indication regarding which scenario the global emissions trajectory is currently broadly in line with.
- Indeed, the latest analysis of existing climate change policies of 40 governments by Climate Action Tracker shows that the world is currently on track for around 2.6°C of warming by 2100[12]. This level of warming is broadly in line with the SSP2-4.5 (Intermediate Emissions) scenario (see Table 4, page 24) which is blatantly not Paris Agreement aligned.
- Specifically, it is currently highly unlikely that the combustion (scope 3) emissions from oil produced from the Rosebank field would be released in countries which have 1.5°C aligned NDC targets. Equinor has said previously that the most likely destination for any oil produced from the development would be the continent of Europe[13]. According to Climate Action Tracker the EU's latest 2035 NDC (submitted this month) is not 1.5°C aligned and neither does it represent the EU's fair share of responsibility to fight climate change[14]. The approval of Rosebank would therefore constitute a direct and knowing contribution to an energy market in countries that are failing to meet their Paris Agreement commitments.

2. Evaluating the significance of the likely effects on the climate

2.1 Faulty assessment of significance

- Equinor estimates the total greenhouse gas (GHG) emissions over the lifetime of the Rosebank oilfield at 254 million tonnes (Mt) CO_2eq. It says these are "*not significant when viewed in the context of international climate commitments, sector-specific Net Zero strategies, and UK government policies*" (p1.7.2).

[10] Potsdam Institution for Climate Impact Research, Land and ocean carbon sinks weakening, and other new insights from climate science, 30 Oct. 2025. https://www.pik-potsdam.de/en/news/latest-news/land-and-ocean-carbon-sinks-weakening-and-other-new-insights-from-climate-science

[11] Climate Change Tracker, 'Current Remaining Carbon Budget', 17 June 2025. https://climatechangetracker.org/climate-change-progress/current-remaining-carbon-budget-and-trajectory-till-exhaustion Note that the 130 GtCO2eq estimate for the remaining carbon budget differs from the Global Carbon Project figure cited in the Overview, which is based on more recent data.

[12] Climate Action Tracker, *Little change in warming outlook for four years; new 2035 climate targets make no difference*, Nov. 2025. https://climateactiontracker.org/publications/warming-projections-global-update-2025/

[13] Justin Rowlatt, 'Will Rosebank oil and gas help UK energy security?', BBC News, 27 Sept. 2023. https://www.bbc.co.uk/news/live/uk-66933804?post=asset%3A79e180df-b921-413e-9912-175cd64e8942#post

[14] Climate Action Tracker, 'EU's new climate targets', Nov. 2025. https://climateactiontracker.org/countries/eu/2035-ndc/

- However, combustion emissions are *always* "significant" effects of fossil fuel projects, as confirmed by the Supreme Court's ruling in our case, "*It is not disputed that these emissions, which can easily be quantified, will have a significant impact on climate*."[15] Note that this case concerned a much smaller oil development. The total emissions from Horse Hill oil were estimated at 10.6 Mt CO_2eq, compared with Rosebank's estimated at 254 Mt. Yet the parties to the case – which included the Secretary of State for Housing, Communities and Local Government – did not dispute that they were significant.
- In 2022 the International Institute for Sustainable Development report found that there was a large consensus across all published studies that developing new oil and gas fields was incompatible with the Paris Agreement 1.5°C target[16].
- In addition, and as stated previously, the totality of climate policies around the world will currently put us on track to breach 2.5°C of warming by the end of the century. Under this "*Intermediate*" future emissions profile and by Equinor's own assessment (Table 14, page 44)) the magnitude of the impact of the Rosebank Development's Downstream Scope 3 Emissions would be significant.
- Para. 6.5.6.2 states that, "*the Rosebank Development is aligned with future demand estimations for oil and gas in each of the IEA scenarios*". It is unclear how this conclusion has been reached. Evidence shows that global oil and gas demand in modelled economic scenarios aligned with the 1.5°C temperature goal can be met or exceeded by forecast production from operational oil and gas fields[17]. This is additional proof that the Rosebank oilfield is not needed and not compatible with the delivery of the Paris Agreement.

2.2 Failure to assess the effects of greenhouse gas emissions

- Crucially, Equinor has made no attempt to assess the actual effects of the 254 Mt CO_2eq emissions. The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020[18] require (Schedule 5, para 3) the assessment of a project's "*effects*" on listed factors including population and human health; biodiversity, with particular attention to species and habitats protected under any law of any part of the United Kingdom; land, soil, water, air and climate; any impact on the environment in other countries; and more. It also includes the "*cumulation of the impact with the impact of other existing or approved projects*" (see section 2.3 overleaf).
- The Supreme Court ruling in *Finch* stressed the need for "*comprehensive and high-quality information about the likely significant environmental effects of a project*"[19].
- The *Finch* ruling also refers to the case Squire v Shropshire Council [2019][20], which concerned the grant of planning permission for a facility for the intensive rearing of chickens. A by-product of the planned activity would be the production of substantial quantities of poultry manure, which was to be spread as fertiliser on agricultural land in the local area. The Court of Appeal held that the EIA for the project was deficient and unlawful because it did not include a proper assessment of indirect environmental effects of the proposed development in the form of smell and dust that would emanate from the storage and spreading of the manure. The floods,

[15] Finch v Surrey County Council, para. 7.
[16] https://www.iisd.org/system/files/2022-10/navigating-energy-transitions-mapping-road-to-1.5.pdf
[17] https://www.ucl.ac.uk/policy-lab/sites/policy_lab/files/report-climate_implications_pages_online.pdf
[18] https://www.legislation.gov.uk/uksi/2020/1497
[19] Finch v Surrey County Council, para. 153.
[20] Ibid., para. 160.

storms, health impacts, etc, that would arise from the warming effect of the carbon emissions from Rosebank are equivalent to the dust and smells in Squire.

- The Regulations therefore require an assessment not just of the amount of greenhouse gas emissions a development will contribute to, but also how those emissions will affect the factors mentioned.
- Furthermore, the European Court of Human Rights, in its very recent judgment on the case Greenpeace Nordic and Others v. Norway on 28 October 2025[21], ruled that approving oil and gas field development without comprehensively assessing the impacts on life and health from all emissions is prohibited under fundamental human rights.
- The linear relationship between greenhouse gas emissions and increased global average temperatures mean that such impacts can be estimated with confidence. The IPCC reports that 1,000 Gt CO_2 emissions causes a best estimate of 0.45°C of increased global surface temperature.[22] A study published in *Nature Climate Change in 2023* similarly concludes that 100 Gt of CO_2e emissions causes an increase of global temperatures of 0.05°C.[23]
- The information on temperature rise can be used in combination with the numerous attribution studies that have been published to estimate the effects – such as reduction in sea ice, reduction in snow cover, increased rainfall, likelihood of droughts, fires and floods, and human mortality – from given volumes of greenhouse gas emissions.[24]
- For example, in the case of mortality, a 2021 paper published in *Nature* drew on public health studies to conclude that for every 4,434 metric tonnes of CO_2 pumped into the atmosphere beyond the 2020 rate of emissions, one person globally will die prematurely from the increased temperature.[25]

2.3 Failure to address cumulative effects

- Equinor states in para. 6.4.9 that, "*The data in Table 16 indicates that Rosebank Development production comprises between 0.06% and 0.08% of global oil production in the 1.5°C compatible case and between 0.07% and 0.03% of global oil production in the 2°C compatible case. Therefore, the Rosebank Development P10 production profile is within a Paris Agreement aligned production pathway.*"

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[21] European Court of Human Rights, Greenpeace Nordic and Others v. Norway. https://hudoc.echr.coe.int/eng?i=001-245561

[22] Valérie Masson-Delmotte et al., 'Summary for Policymakers', in *Climate Change 2021: The Physical Science Basis*, Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, IPCC, 2021, page 28, para. D.1.1. https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf

[23] Lamboll, R.D., Nicholls, Z.R.J., Smith, C.J. et al. 'Assessing the size and uncertainty of remaining carbon budgets', *Nature Climate Change*, vol. 13, pp. 1360–1367, 2023. https://doi.org/10.1038/s41558-023-01848-5

[24] For example, Dirk Notz and Julienne Stroeve, 'Observed Arctic sea-ice loss directly follows anthropogenic CO_2 emissions', *Science* 354: 6363, 2016, p. 747, https://doi.org/10.1126/science.aag2345; Mika Rantanen et al., 'The Arctic has warmed nearly four times faster than the globe since 1979', *Communications Earth & Environment*, vol. 3, 2022, https://doi.org/10.1038/s43247-022-00498-3; Wim Thiery et al., 'Intergenerational inequities in exposure to climate extremes', *Science* 374: 6564 pp. 158–160, 2021. https://doi.org/10.1126/science.abi7339;R. Daniel Bressler, 'The mortality cost of carbon', *Nature Communications*, vol. 12, 2021, https://doi.org/10.1038/s41467-021-24487-w ; A. M. Vicedo-Cabrera et al., *The burden of heat-related mortality attributable to recent human-induced climate change, Nature Climate Change*, vol 11, 2021, p. 492–500, https://doi.org/10.1038/s41558-021-01058-x; IPCC, '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*, 2023

[25] R. Daniel Bressler, 'The mortality cost of carbon', *Nature Communications*, vol. 12, 2021, https://doi.org/10.1038/s41467-021-24487-w

- This ignores the cumulative effect. Rosebank will add to all the other existing and planned oil and gas sites. Therefore its impact must be considered in relation to the stock of existing fields elsewhere. The government's EIA scope 3 supplementary guidance[26] says: "*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*."
- Existing oil and gas fields contain more fossil fuels than the world can afford to burn. As referred to in the Overview a 2023 briefing from Oil Change International[27] found that "committed emissions" from the oil, gas and coal to be extracted from existing fields and mines amounted to 915 $GtCO_2$. This is more than five times the global carbon budget (of 170 Gt CO_2) for a 50% chance of limiting warming to 1.5°C.
- The cumulative effect of greenhouse gas emissions on the atmosphere also means that the timing of reductions is critical. The earlier we prevent emissions, the more years of cumulative heating are avoided.

2.4. Reliance on other regimes

- Equinor's assertion that the emissions from Rosebank are "*not significant*" relies on all parties to the Paris Agreement meeting the Agreement's temperature goals. Para. 6.5.3 says, "*In a scenario where Parties to the Paris Agreement have failed to 'hold the increase in the global average temperature to well below 2°C above pre-industrial level' and pursue efforts 'to limit the temperature increase to 1.5°C above pre-industrial levels', the emissions from any project, including the Rosebank Development, could have a significant effect on climate. This is because, all emissions in that scenario will have a significant effect due to the sensitivity of the climate as a receptor and the cumulative effect of continuing unabated emissions*." And at para. 6.5.4: "*However, it must be recognised that Parties to the Paris Agreement have committed to achieving the overarching goal to "hold the increase in the global average temperature to well below 2°C above pre-industrial levels*" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels".
- The Finch judgment states: "*It was a clear legal error to regard this aspect of planning policy as a justification for limiting the scope of an EIA. An assumption made for planning purposes that non-planning regimes will operate effectively to avoid or mitigate significant environmental effects does not remove the obligation to identify and assess in the EIA the effects which the planning authority is assuming will be avoided or mitigated*."[28] In the present case, Equinor is treating the Paris regime and UK Climate Change Act as "other regimes" which will deal with the problem of its vast greenhouse gas emissions. This is not acceptable.

3. No discussion of alternatives to oil production

- Both the Offshore EIA Regulations Guidance and the new supplementary guidance say that the Environment Statement should also describe the reasonable alternatives studied by a developer for a proposed project.

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[26] Department for Energy Security and Net Zero, *Environmental Impact Assessment (EIA) – Assessing effects of downstream scope 3 emissions on climate*, June 2025, page 12. https://assets.publishing.service.gov.uk/media/6853fa3d1203c00468ba2b15/Supplementary_guidance_-_Effects_of_Scope_3_Emissions.pdf

[27] Oil Change International, *Sky's Limit Data Update*, 2023, https://www.oilchange.org/wp-content/uploads/2023/08/skys-limit-data-update-2023-v3.pdf

[28] Finch v Surrey County Council, para. 108.

- Equinor discussed alternatives in Chapter 2 of the 2022 Rosebank Environmental Statement.[29] It covers alternative field development options, but it does not consider alternatives to oil production. To be complete, the ES should have been revised with consideration of alternative energy generation methods such as offshore wind.

4. Submission by Uplift

We formally endorse and adopt in full the detailed points made in the consultation response by Uplift, which is appended here, and wish for our submissions to be considered in conjunction with theirs.

5. Conclusion

For the reasons set out above, consent for the Rosebank Project should not be granted.

[29] Equinor, Ithaca Energy and Suncor Energy, *Rosebank Environmental Statement*, 2022. https://assets.publishing.service.gov.uk/media/62f62fec8fa8f50b4de7f743/Rosebank_Environmental_Statement_-_Final_for_Submission_To_OPRED_Equinor_3rd_August_2022.pdf

R0117

Dear OPRED,

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I object to the further development of oilfields in the Faroes Gap, specifically Rosebank.

My understanding of figures published by the Government and the oil Industry is that this field would be surplus to projected requirements If the government plans to maintain progress towards reductions in Carbon emissions to achieve previous internationally agreed targets.

In addition

1- The Faroes gap is an expensive place to drill

2 - There are myriads of Hillsides in Scotland still available and suitable for Turbines

3 - There are many untapped Hyro electric sources in the Celtic fringes of the UK

4 - The proposed undersea cable from East Anglia to Kent shows that electricity can be moved long distances without new pylons in highly populated areas.

5 - Hundreds of new houses in my local area of Devon are still being built without Solar panels

Why does the government not make it illegal for local authorities to allow houses and commercial properties be built without Solar generation facilities?

Yours Faithfully

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R0118

Good morning,

NLB have no additional comment to provide beyond our original response in 2022.

Regards

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Northern Lighthouse Board

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