J0011

Dear Sir/Madam,

I am writing to express my support for the continued development of the Jackdaw and Rosebank projects and for a balanced approach to the UK's energy policy.

As the UK transitions towards a lower-carbon future, it is important that this transition is managed responsibly. Renewable energy must continue to grow, but the UK will continue to require oil and gas for many years to come. Producing these resources domestically is preferable to increasing reliance on imports, which can expose the country to greater geopolitical risks and often result in higher overall emissions associated with transportation.

The North Sea remains one of the UK's most valuable strategic assets. It supports thousands of highly skilled jobs, sustains local communities, strengthens supply chains, and contributes significantly to the UK's energy security. Companies operating in the sector are also investing in carbon reduction technologies and helping develop the skills and infrastructure needed for the energy transition.

A balanced energy strategy should therefore recognise the importance of maintaining responsible domestic oil and gas production while accelerating investment in renewable energy. These goals are not mutually exclusive—they can and should progress together.

Supporting projects such as Jackdaw and Rosebank will help safeguard employment, maintain the UK's technical expertise, strengthen national energy resilience, and reduce dependence on imported energy during the transition to net zero.

I respectfully ask the Government to continue supporting a pragmatic, balanced approach that protects both the UK's energy security and the livelihoods of the many people and businesses that depend on the North Sea industry.

Thank you for considering my views.

J0012

I am writing to voice my support for DESNZ to approve the Jackdaw development. UK gas production has been demonstrated to have significantly less CO2 emissions than imported options. The associated jobs and tax revenue are also in the national interest to promote and encourage. Furthermore, Jackdaw approval would provide clarity around the regulatory requirements that would allow for other developments in the basin to proceed.

J0013

Concerning the Jackdaw gas platform (reference D/4260/2021), I fully support the immediate opening of this vital gas supply.

I work in the Scotch Whisky industry. We must make our product in Scotland, and Scotch Whisky is a vital source of export revenues for the United Kingdom.

However, the cost of our inputs is very much tied to energy. Energy we are currently importing from fragile places in the middle east.

It is total insanity to attempt to shut off production of natural gas in the north sea, and then pivot and import those products from deeply unpleasant regimes abroad.

You must approve the Jackdaw platform as soon as possible to reduce our reliance on expensive, imported energy and to ensure we as an industry have reliable and low cost inputs to ensure we can continue to operate competitively in the ruthless international beverage market.

J0014

The UK, and indeed the rest of the world, will continue to use crude oil and natural gas for the next thirty years at least. While we undergo the transition to renewable energy, we will need baseload and peaking plants. Nuclear will not ba able to do this alone - we will need natural gas power stations fro teh foreseeable future. The price of UK natural gas (NBP) has risen 300% since 2022. To leave large reserves of gas and oil and not to extract them would be financially reckless as well as playing fast and loose with our energy security. If we do not extract it ourselves we are going to have to but it from Qatar or the USA. Common sense says take the fuel - given the emissions of India, China and the USA, it will have an effect no bigger than a rounding error on global warming. None of our competitors would leave it in the ground - we would be mugs if we did.

J0015

I write to confirm my support for the opening of the Jackdaw gas field in the northeast of Scotland

It is ridiculous that this field has not been open before now to ensure energy security and secure employment in the northeast of Scotland which has been decimated by the ridiculous policies of the current government.

Jackdaw and Rosebank should be approved immediately instead of importing gas and oil from overseas in particular Norway who are producing and selling gas from the North sea to us, which does nothing to reduce global pollution.

J0016

Dear OPRED / Secretary of State,

I am writing in response to the Jackdaw Field Development consultation, reference D/4260/2021
I strongly support consent being granted for Jackdaw.
I have 20+ years experience working in the North Sea upstream oil and gas industry, therefore I am responding in a personal capacity. My experience has reinforced my view that the UK must manage the energy transition pragmatically.

The UK will continue to need gas for a number of years. The choice is therefore not between gas and no gas, but between responsibly regulated domestic production and greater reliance on imports.

Jackdaw is a materially advanced Central North Sea development tied back to existing infrastructure. Refusing consent would not remove UK demand; it would shift supply overseas, weaken domestic industry, reduce economic value for the UK and undermine energy security.

Scope 3 emissions should be properly assessed, but they must be considered alongside the realistic alternative of imported gas, continuing UK demand, jobs, tax revenues, supply-chain capability and security of supply.

I therefore encourage the Secretary of State and regulator to grant consent for Jackdaw, with proportionate conditions on emissions monitoring, methane management, and minimising flaring and venting.

Approving Jackdaw would be a pragmatic, responsible decision that supports UK energy security and a managed transition.

J0017

I am writing in response to your request for Public Consultation. I believe that Jackdaw (and other fields) should be developed and the UK should Maximise economic recovery from the basin rather than importing hydrocarbons to fill the on-going requirements. Studies show that even if the Uk does maximise the economic recovery from the basin we will produce less hydrocarbons than the net zero path says we will require going forward. Stop importing and support our local industries, this will help to deliver growth for the uk and increase tax take. So in summary I support the immediate production approval for the Jackdaw field.

J0018

Dear Secretary of State

I wish to say that I believe that the proposed Jack Daw field and the associated Rosebank project should be approved.

I would like to see the boost that these projects would give to the economy

I would like to see the increase in jobs and investment in the North Sea

I would like to see the use of our own resources rather than the continued importation of foreign resources

I recently saw that over a 60 year period the climate had only warmed by 0.8 per cent in the UK (this information was published by the Met Office earlier this year

I do not believe that climate alarmism should obstruct national developments in the North Sea

J0019

I wish to state my support for the Jackdaw development in the CNS of the UKCS.

The UK will require gas for several decades to come under all foreseeable energy transition scenarios. It makes economic and environmental sense to maximise gas extraction from the UKCS, versus higher-emission LNG imports from the Middle East or

East coast of the US, or from Norway, where UK gas demand is contributing to the ever-growing Norwegian sovereign wealth fund.

Approval of the production consent for Jackdaw is the best outcome for UK plc and it should be granted at the earliest opportunity.

J0020

I am writing in support of the Jackdaw Field Development.

The UK's demand for natural gas has not disappeared and remains significant. Approximately 86% of UK homes are still heated by gas boilers, with around 29 million households across the UK continuing to rely on gas for heating and energy needs. The transition to alternative heating systems will take many years and, during this period, the UK will continue to require substantial supplies of natural gas.

If the UK does not produce sufficient domestic gas, it will increasingly rely on imports. Importing gas can increase the overall carbon footprint due to transportation and the additional emissions associated with liquefaction, shipping and regasification processes. It therefore seems sensible to prioritise domestic production where possible while the transition to lower-carbon technologies continues.

The Jackdaw development would also provide important economic benefits. It would support local jobs and supply chains, particularly in the North East of Scotland, where many communities continue to depend on the energy sector. The project would help sustain skilled employment and apprenticeships and support the wider regional economy.

In addition, domestic production allows employment taxes and corporation taxes associated with these activities to remain within the UK, generating revenue that can be used to support public services and invest in the country's energy transition.

I therefore urge the Department to give due consideration to the UK's ongoing reliance on natural gas, the economic importance of the energy sector to the North East of Scotland, and the benefits of maintaining secure domestic energy supplies during the transition to net zero.

J0021

I am writing to express my support for the Jackdaw project.

I support the Jackdaw project because the UK offshore energy sector is already facing significant challenges, including substantial job losses across the North Sea. With many assets approaching cessation of production (CoP), there is a growing risk of further decline in employment, investment, skills retention, and supply chain capability.

Projects such as Jackdaw are important for helping to sustain highly skilled jobs, apprenticeships, and local businesses that depend on the offshore industry. Without continued investment in viable developments, there is a real risk that the North Sea industry could face an accelerated contraction, leading to the loss of expertise and infrastructure that have been built up over decades.

I believe it is important to balance environmental considerations with economic and energy security needs. Responsible development of domestic resources can help support employment, maintain critical industry capabilities, and reduce reliance on imported energy while the UK continues its energy transition.

While it is important that all environmental protections and monitoring requirements are fully implemented, I believe the project has demonstrated a commitment to meeting regulatory standards and managing potential impacts responsibly.

For these reasons, I support the Jackdaw project and encourage the relevant authorities to approve its progression.

Thank you for considering my views.

J0022

I raise my concerns over the Jackdaw gas platform (reference D/4260/2021), I fully support the immediate opening of this vital gas supply.

I work in the Scotch Whisky industry, and all our operations are based on gas supply and cheap one at that to ensure profitability or even being operational.

I understand as a society we must move away from Fossil Fuels, but we must accept the fact that we will continue importing such fuels from more delicate regions marred with conflict and authoritarian regimes.

What we are just doing is shifting our carbon emissions on them while we continue utilising gas being imported from thousands of miles away while we have resources in our own backyard.

I request approval for the Jackdaw platform as soon as possible to reduce our reliance on expensive, imported energy and to ensure we as an industry have reliable and low-cost inputs to ensure we can continue to operate competitively in the ruthless international beverage market.

J0023

I am writing in response to the public consultation concerning the Jackdaw Field Development, reference D/4260/2021.

I support the application, subject to the Secretary of State and the relevant regulators being satisfied that the identified environmental effects can be appropriately avoided, reduced, mitigated and monitored.

I work within the UK offshore oil and gas industry and have experience in drilling, well engineering, well integrity and abandonment operations. From that perspective, I recognise the importance of ensuring that developments are subject to robust environmental assessment, clear operating conditions and effective regulatory oversight.

I understand that the Jackdaw development comprises a four-well, normally unattended platform tied back to the existing Shearwater infrastructure, and that the platform, pipeline and drilling activities are already substantially complete. I believe the

use of existing offshore and processing infrastructure is a relevant consideration when assessing the overall environmental impact of the project.

I also believe the decision should consider the realistic alternatives to Jackdaw production. UK gas demand will not immediately disappear if the project is refused, and any assessment should therefore consider whether the displaced production would be replaced by imported pipeline gas, liquefied natural gas or other energy sources, together with the associated lifecycle emissions, transportation requirements and energy-security consequences.

I acknowledge that Scope 3 emissions must be properly assessed. However, I would encourage the Secretary of State to evaluate those emissions alongside:

- the likely source of replacement energy if Jackdaw does not proceed;
- the project's operational and production emissions;
- the use of existing Shearwater infrastructure;
- the proposed environmental mitigation and monitoring measures;
- the contribution of domestic gas production during the energy transition; and
- the economic and employment benefits associated with maintaining UK offshore capability.

Where residual environmental impacts are identified, I would support consent being granted with proportionate and enforceable environmental conditions, monitoring requirements and emissions-reduction measures.

On balance, I believe the project should be allowed to proceed, provided Adura Operations Limited complies with all applicable environmental, safety and regulatory requirements.

Please take this representation into account when considering the environmental assessment and the application for consent.

J0024

I am writing in support of the Jackdaw Field Development.

The UK's demand for natural gas has not disappeared and remains significant. Approximately 86% of UK homes are still heated by gas boilers, with around 29 million households across the UK continuing to rely on gas for heating and energy needs. The transition to alternative heating systems will take many years and, during this period, the UK will continue to require substantial supplies of natural gas.

If the UK does not produce sufficient domestic gas, it will increasingly rely on imports. Importing gas can increase the overall carbon footprint due to transportation and the additional emissions associated with liquefaction, shipping and regasification processes. It therefore seems sensible to prioritise domestic production where possible while the transition to lower-carbon technologies continues.

The Jackdaw development would also provide important economic benefits. It would support local jobs and supply chains, particularly in the North East of Scotland, where many communities continue to depend on the energy sector. The project would help sustain skilled employment and apprenticeships and support the wider regional economy.

In addition, domestic production allows employment taxes and corporation taxes associated with these activities to remain within the UK, generating revenue that can be used to support public services and invest in the country's energy transition.

I therefore urge the Department to give due consideration to the UK's ongoing reliance on natural gas, the economic importance of the energy sector to the North East of Scotland, and the benefits of maintaining secure domestic energy supplies during the transition to net zero.

J0025

I am writing in support of the Jackdaw Field Development.

The UK's demand for natural gas has not disappeared and remains significant. Approximately 86% of UK homes are still heated by gas boilers, with around 29 million households across the UK continuing to rely on gas for heating and energy needs. The transition to alternative heating systems will take many years and, during this period, the UK will continue to require substantial supplies of natural gas.

If the UK does not produce sufficient domestic gas, it will increasingly rely on imports. Importing gas can increase the overall carbon footprint due to transportation and the additional emissions associated with liquefaction, shipping and regasification processes. It therefore seems sensible to prioritise domestic production where possible while the transition to lower-carbon technologies continues.

The Jackdaw development would also provide important economic benefits. It would support local jobs and supply chains, particularly in the North East of Scotland, where many communities continue to depend on the energy sector. The project would help sustain skilled employment and apprenticeships and support the wider regional economy.

In addition, domestic production allows employment taxes and corporation taxes associated with these activities to remain within the UK, generating revenue that can be used to support public services and invest in the country's energy transition.

I therefore urge the Department to give due consideration to the UK's ongoing reliance on natural gas, the economic importance of the energy sector to the North East of Scotland, and the benefits of maintaining secure domestic energy supplies during the transition to net zero.

J0026

I am writing in support of the Jackdaw Field Development.

The UK's demand for natural gas has not disappeared and remains significant. Approximately 86% of UK homes are still heated by gas boilers, with around 29 million households across the UK continuing to rely on gas for heating and energy needs. The transition to alternative heating systems will take many years and, during this period, the UK will continue to require substantial supplies of natural gas.

If the UK does not produce sufficient domestic gas, it will increasingly rely on imports. Importing gas can increase the overall carbon footprint due to transportation and the additional emissions associated with liquefaction, shipping and regasification processes. It therefore seems sensible to prioritise domestic production where possible while the transition to lower-carbon technologies continues.

The Jackdaw development would also provide important economic benefits. It would support local jobs and supply chains, particularly in the North East of Scotland, where many communities continue to depend on the energy sector. The project would help sustain skilled employment and apprenticeships and support the wider regional economy.

In addition, domestic production allows employment taxes and corporation taxes associated with these activities to remain within the UK, generating revenue that can be used to support public services and invest in the country's energy transition.

I therefore urge the Department to give due consideration to the UK's ongoing reliance on natural gas, the economic importance of the energy sector to the North East of Scotland, and the benefits of maintaining secure domestic energy supplies during the transition to net zero.

J0027

Dear Business Support Team / OPRED Review Committee,

I am writing to submit my formal representation regarding the environmental statement and proposed authorization for the Jackdaw Field Development (Reference: D/4260/2021).

While I recognize the ongoing discussions surrounding domestic energy security, I wish to state clearly that my support for the authorization of this project is strictly conditional. I urge the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) and the Department for Energy Security and Net Zero (DESNZ) to grant approval only if Carbon Capture and Storage (CCS) is made a legally binding condition of the production license.

In order to align with the UK's legally binding net-zero commitments, the significant carbon emissions produced by this development must be actively mitigated. Requiring the operator to integrate a robust CCS framework to fully offset the field's operational and production emissions is the only responsible pathway forward. Without this mandatory environmental safeguard, I object to the project's authorization.

Thank you for considering this representation and ensuring it is included in the public record.

J0028

I am writing to submit my representation in support of the proposed Jackdaw Field Development.

I believe the project has an important role to play in supporting the UK's energy security while the country continues its transition to lower-carbon energy sources. Domestic production of oil and gas can help reduce reliance on imports, improve resilience of energy supplies, and support employment, skills, and investment across the UK, particularly within the North Sea energy sector. With the equipment and technology available now I believe we can achieve a sustainable future for our industry.

I also recognise that the project has been subject to environmental assessment and further consultation. It is important that any development proceeds in compliance with all environmental regulations and with appropriate measures to minimise environmental impacts.

In my view, responsible domestic production, alongside continued investment in renewable energy and emissions reduction, provides a balanced approach to meeting the UK's current and future energy needs.

Thank you for considering my representation as part of this consultation.

In conclusion I ask a small question how can we look to turn to wind turbines when we can't even get a turbine project off the ground without the help of oil and gas and all the equipment and products.

I believe one day there will be a better solution but for now let's not turn the tap off one side and start other let's bring the 2 together and have both working for us.

J0029

I am writing to comment on the approval of the Jackdaw gas field as a scientist with nearly 30 years' experience of research into radiative processes in the Earth's atmosphere, which are the key aspect of anthropogenic impacts on climate.

Several of the arguments put forward by the developers and supporters are spurious. For example, it has been shown that the new gas field would not reduce UK energy prices by a significant amount, and may actually increase them since renewable energy prices are declining fast. Similarly, the field, even if fully exploited, would only reduce our need to import gas by as little as 2%. Furthermore, greater employment numbers could be obtained through supporting sustainable energy generation, such as both offshore and onshore wind power. From a long term perspective, investing into and tying UK economy to a declining activity that is fossil fuel production - and which is certain to decline even faster in the face of inevitable future backlash due to growing negative impacts of climate change - is economically and politically insane.

From a more subjective, but still valid viewpoint, I find it astonishing that we are even considering possible approval of this development. This is even more stark in the weeks when the UK broke several high temperature records and large proportion of the population experienced directly the deleterious effects of anthropogenic climate change. Approving a massive new fossil fuel project during a climate crisis is completely unacceptable rationally, scientifically, politically and from broader humanitarian point of view.

I therefore urge OPRED and the Government to reject this application.

J0030

The government has a golden opportunity to transform the global climate conversation. If it must consent the Jackdaw gasfield, make the licence conditional on an obligation to store a rising fraction of the carbon dioxide that gas will generate. Jackdaw would then be the first producing gasfield in the world that is demonstrably aligned with the goals of the Paris agreement, which would also address the supreme court ruling.

Crucially, this also forces the issue for other producers. If all new fossil fuel production were licensed on these terms, the industry would be brought into line with our climate goals.

J0031

Ref: D/4260/2021

This is my consultation response on the Jackdaw Field Development.

In principle, there're should be no more gas or oil field licences granted in the UK and its surrounding seas. We should not be investing in, or relying on, continuing fossil fuel extraction, because of the resulting carbon release and its impact on the climate crisis. Jackdaw would generate an additional 36.8 million tonnes of carbon release.

Jackdaw should not be licensed.

However, it may be decided that this one field should be permitted, for short-to medium-term expediency.

In that case, there should be a watertight 'total carbon capture' condition of the licence.

That should require that all carbon resulting from this approval should be balanced by requiring the same annual amount to be subject to carbon capture. This would include the total cost and management of 100% carbon capture by the Jackdaw licensee.

J0032

With respect to this proposal, I do not agree on principal that it should proceed as it risks our failure to meet carbon reduction targets and sets a bad example to other nations.

However, if the Minister intends to consent to the Jackdaw gasfield, the licence must be made conditional on an obligation to store a rising fraction of the carbon dioxide that gas will generate. Jackdaw would then be the first producing gasfield in the world that is demonstrably aligned with the goals of the Paris agreement, which would also address the supreme court ruling.

J0033

It seems clear to me -- given the uncertainties facing us around the world, and the rising costs of in Britain over energy, together with uncertainty about future supply -- that we should move aggressively to pursue a policy of maximum resilience, based on homegrown energy, in the fastest way possible, at the least public and private expense.

This would inevitably include maximising drilling in the North sea for oil and gas, where in my opinion, all restrictions should be removed without time limit .... and also the maximum use of fracking technologies -- once again without time limit -- to maximise the extraction of available resources, wherever they exist within the UK.

It is also a nonsense that we refuse to grant licences to extract coal from under our own land -- which is necessary for the production of high-grade steel -- while concurrently importing the same quality of coal from other countries, thereby adding additionally the carbon emissions associated with its transportation.

Coal extraction and use should therefore similarly be approved without exception wherever this is commercially viable .... just as China and many other countries are exploiting their coal reserves, in the interests of their people, businesses and economy.

These are the only policies which make sense in terms of what is right for British people up and down the country, especially those with limited income .... and also businesses who are being stifled and forced to close or curtail operations -- with associated unemployment -- due to energy costs amongst the very highest in the world .... and in many cases of the order of four times those experienced in the United States, with whom our businesses and economy must compete.

The UK represents less than 1% of the total contribution to carbon emissions .... and we must tailor our strategies in the light of the much more modest adjustments being made by the three major carbon producers of China, India and the USA .... all of whom are adopting (correctly !) policies primarily aimed at improving the lives of their people, and the economies of their countries.

This same approach for the UK is the only one justified by rational analysis, and should be adopted without exception, immediately

It is far past the time when we should be putting the UK economy, UK businesses and the UK people at the heart of decision making .... and worrying less -- frankly, not at all -- about creating legacies for politicians who are failing to protect our interests in other regards.

Let's exploit all of the energy we have in our territories as quickly as we can .... including ALL oil, gas & other fossil fuel deposits -- wherever they may be -- and maximise their extraction and use to reduce the cost of living for ordinary people .... to help British

businesses to flourish .... and to secure internal United Kingdom energy sources, which in an emergency could shield us from international shocks.

This approach seems patently clear to me to be the correct strategic response to the situation we face .... and to be of the highest priority and extremely urgent, and should be adopted without delay .... whatever changes to agreements or laws may be necessary to achieve it.

Such laws and accords are man-made artefacts, which can be adjusted according to the circumstances .... and it is well past the time when all such artefacts took a secondary place, behind the interests and well-being of the British people, and the British economy.

I would be happy to elaborate on any aspects of my analysis, or to discuss these points further.

J0034

I am writing to implore the powers that be to give the Rosebank & Jackdaw projects the go ahead.

They are essential on so many levels - mainly energy security & the UK economy. We need energy and jobs (they all pay a lot of taxes), it is wrong to import energy when we can so effectively & efficiently produce our own.

I won't rant any more, you get the message.

J0035

Dear OPRED,

thank for the opportunity to be consulted on the Jackdaw Development.

I would ask you that the production from the development is allowed to be consented to, so that production may commence.

The operator has complied with the additional assessment of the scope 3 emissions from the development.

The largest estimate of scope 3 emissions is 35.8MTCO2e from the development and production from Jackdaw.

The development is already built and installed.

If production is not consent to, then no production and thus no scope 3 emissions will be produced from Jackdaw.

However, **the UK will still have 35.8MTCO2e scope 3 emissions, it will come from buring some other countries natural gas in the UK.**

If Jackdaw does not produce, the hydrocarbons will still be required by the UK.

No-one will say "I only burn UK produced gas, I am not burning foreign gas."

And I consider that no-one will change their fuel source in the UK from gas to renewables BECAUSE Jackdaw does not produce.

The gas volume will be consumed, and thus the scope 3 emissions WILL be emitted in the UK irrespective of where the gas comes from.

Stopping Jackdaw producing has ZERO impact on the UK scope 3 emission.

It is also worth noting that natural gas will still be required beyond 2050 in each UK Net Zero scenario for electricty generation and probably domestic heating.

Carbon capture can abate the emissions from gas fired power stations but gas is still required.

I have not been able to find government information of the expected date that NO natural gas wil lbe requried for power in the UK.

Does it exist?

The UK is and will be reliant on natural gas, regardless from where it comes.

Let's use developed british gas first.

J0036

I would like to express my horror at the thought of renewed extraction of oil and gas extraction being approved by my government.

This summer has shown us all how the climate is warming at an alarming rate due to the CO2 and methane gases added to the atmosphere by mankind. The CO2 concentration level in the air is still rising due solely to human created pollution. It has just exceeded 430 ppm. This level is around twice that of the level on earth for the 800,000 years prior to the Industrial Revolution, when man first began to add to natural levels, and causes the atmosphere to retain heat and warm the air, as well as the land and seas. This warming has increased temperatures of the air by almost 1.5 degrees centigrade. The UK seas are warming even faster.

We have seen the terrible effects of an overheating world more and more as time has passed with insufficient action by governments to begin to return the CO2 levels to a natural level. Last year around the world it is estimated that man-made excess heat killed tens of thousands of people. Here in the UK the number of excess heat deaths were around 1500. That shows to me that government decisions and inaction on reversing climate change is already killing vast numbers of people.

The same is happening across Europe, where the continent in general is warming at a particularly fast rate. Thousands more people are killed by the effects of excess heat each year, and this year we will see staggeringly high numbers of dead. These people, here in the UK and elsewhere are now dead because of government decisions not to slash CO2 and methane levels drastically.

Approving another new oilfield will further add to pollution levels of both CO2 and methane, firstly from the extraction process itself, whereby staff are shipped and flown around to many it, construction works of equipment and infrastructure. But more importantly still each barrel of oil will we processed and refined, again creating more pollution, and then burnt as heating oil, petrol, or other petrochemicals for human consumption within a few short years, at the very time we need to be reducing world fossil fuel consumption.

In 2018 the UN panel on climate change warned that we had just until 2030 to stop irreversible damage to the atmosphere which will lead to runaway climate change. Yet since 2018 the levels of pollutants in the air have continued to rise due directly to government decisions and delays in enacting deep cuts to fossil fuel usage. The same is happening everywhere. Excuses given are the cost-of-living crisis and energy security because of wars around the globe. The 1.5 C limit will be breached within months, if it hasn't already. Jackdaw with add further to the level of threshold breaching.

Will these excuses make it OK to poison the air and overheat the world still further? Will they mean it is perfectly fine to kill thousands more elderly and vulnerable people both here in the UK and abroad? I find it extraordinary that I am asking my government not to make the decision to condemn thousands of its citizens to an early death. This is akin to corporate manslaughter by government. Or will government somehow attempt to justify these deaths to the families of the deceased?

Let us be clear please that approving Jackdaw on a pretence of energy security is a lie. There are alternatives. We can reduce energy consumption through rationing or through green production by wind solar hydro and tide. No, the real reason is the tax benefit to the government. Our failing economy needs the tax revenue to help prop up a failing government, with expensive spending plans and promises to an electorate that will otherwise vote it out of power. This would be a decision of political self-preservation by a socialist government at the cost of many extra deaths.

Such a decision to approve Jackdaw shows short-termism: the desire to solve a fear of an energy shortfall by further delaying the urgent and complete conversion of our energy infrastructure to green power, which has been delayed and delayed again for decades. All these delays heat the planet and cost lives. By the thousands.

The effects of the warming from excess fossil fuel usage affect the natural world even more than the human community. Humanity needs a thriving natural world living alongside it to preserve the ecosystems we rely on. No flora and fauna will also mean human extinction. Please government, think beyond your own popularity and position, and think of the pain and suffering of the vulnerable who will die in the coming years, and the long-term survival of humanity and of all life on earth that we live alongside and are reliant upon.

Such a wrongful approval of more fossil fuel extraction fails to consider sea level rises too. By 2050 the seas are set to rise due to melting ice sheets and glaciers. Large areas of the UK will begin to be flooded regularly by high tides, and then they will be lost entirely as they are permanently inundated by the sea. This will include whole towns such as Clevedon, Highbridge, and Weston-super-Mare just in my locality. Jackdaw's pollution will only speed the disappearance of these places. Will the cost of government compensation to those forced from their homes be considered in this decision? When and how will government break the news to those about to lose their homes? They know this will happen now, but they will pretend it is an unforeseen natural flood, and give just a few days warning, after several homes disappear under the first violent storm surges. They will argue that billions have been spent on coastal defences, when what was really needed was a decision to reverse the climate changes they have been warned about for decades.

And if government still needs to consider the short-term financial impact, then consider the right to life enshrined by the Human Right Act, and the cost of compensation to the families of those who die from government failings on climate change. I have vulnerable relatives in poor health which will be made worse by a warming climate. If they die, then I will be the first to seek judgement and recompense through the courts.

There are also other sections of the Human Rights Act that would be breached: the right to a family life for example. The loss of a home, to be moved to a temporary shelter surely breaches this right.

The argument for energy security is also flawed:- Continued and increased use of fossil fuels leads to ever greater energy usage particularly to mitigate the effects of global warming, because we need to power ever more air conditioning units, in homes and cars. It is self-defeating. Buildings will need adapting at great expense to prevent

overheating of the occupants. This is another example of short-term thinking by government.

To sum up, I am against Jackdaw. It is against scientific advice, and against centuries of British justice.

J0037

I urge the Secretary of State to approve the Jackdaw field proposal as soon as possible.

Opponents argue that all oil and gas fuel use generate CO2 and can intensify global warming and that therefore the field should not be approved. This argument should be rejected as it is fundamentally flawed.

It is correct that all oil and gas fuel use generate C02, however Britain still requires a substantial amount of both oil and gas for energy use. This has to come from somewhere. Either it is extracted within British waters or it is imported. If we do not extract the oil and gas within British waters this does not mean that this will reduce UK oil and gas use. It just means that we will have to import it thereby incurring a foreign currency cost. At present, a significant amount of gas is imported from Norway and a not inconsiderable part of this comes from North Sea gas fields adjacent to the Jackdaw field. We are therefore importing gas which we could produce ourselves from the same reservoir.

It is sometimes argued by opponents of the development that approving the field will not reduce the cost of gas in the UK. This is probably correct as the price of gas is set on the international market. However, this is irrelevant as this is not the justification for developing the field. The reasons for developing the field are fivefold: (a) It will increase national energy security in an increasingly uncertain world, (b) it will reduce the balance of payments deficit, (c) it will help to generate or save jobs in NE Scotland and elsewhere which may otherwise be lost and will therefore (d) aid economic growth; (e) it will increase UK government tax revenue levied on oil and gas production,.

The infrastructure for the field development is already largely in place and it would be a waste of money and resources not to utilise it. Refusing to approve the proposal will not aid the move towards net zero in any meaningful way as we will still need to import gas for many decades to come.

It may be argued that developing the field may generate adverse environment effects for Norway. However, Norway already produces gas from the same field which may theoretically generate adverse environmental effects for the UK. If we do not extract the gas and Norway does, this may produce a similar level of adverse effects but it is

difficult to see why this would effect Norway more than the UK. The gas is probably going to be extracted one way or another by Norway or by the UK, so why not extract it from UK waters helping to reduce the UK balance of payments deficit, protect UK jobs and aid UK economic growth. Failure to approve the project would simply be net zero grandstanding which will generate no benefit for the UK and will, in fact, incur significant financial costs for the country.

In conclusion, refusal to approve the project will not aid British net zero ambitions as the gas will continue to be used in Britain and it will have to be imported at additional cost. A refusal would not help us to reduce our energy usage or CO2 production.

J0038

I am writing in response to the public consultation regarding the development of the Jackdaw Field.

I am the Chief Executive of a leading Executive Recruiter in the North East of England and with operations throughout the UK and Western Europe. I am also an active private investor, economist and geographer with a deep understanding of both Climate Studies and the Energy Industry.

There are multiple great reasons for developing Jackdaw as it is widely acknowledged the UK will continue to need gas for many decades to come.

In the recent heatwave Gas was regularly producing 50% of our electricity and similar levels are seen during cold snaps in the winter. The average over the whole year is still some 30% + produced by gas. No amount of extra wind or solar will replace this during calm dark periods. There is no technology currently available to store the electricity needed during these periods. The best technology to develop would be nuclear in particular SMR's though the government has as usual been slow on these matters.

So if we must burn gas then far better it is our UK sovereign resource that is used.

It has lower carbon output. (LNG is a higher carbon wasteful and expensive alternative)

It has security of supply. Currently Qatar one of the major LNG export hubs is cut off from the world due to the Gulf war.

It generates Uk jobs

It is cheaper than LNG. Gas is not a global price and has strong regional variations.

It generates UK tax

It helps the UK balance of payments.

Given all the above it is almost beyond belief that this field is not already operational. It is no wonder that the UK economy suffers from such low growth.

As a business operating across UK/Western Europe and the US we have a terrific view of where businesses are expanding and thriving. We witness first hand the pain of the UK manufacturing sector especially those industries with greater exposure to the UK's sky high electricity costs.

Sadly too often we witness firms closing their UK operations in favour of more favourable economic drivers elsewhere.

J0039

First, may I thank you for taking climate change seriously; it is a relief to have a minister and team who are taking active steps in the right direction.

I'm writing to urge you to deny permission for the Jackdaw gas field to start production. There is no convincing case that it will improve UK energy security, which can be achieved through much more responsible methods that are cleaner and generate green jobs.

Auda's claim that emissions will be low compared with global emissions is despairing – if that was a valid point, it would justify every action that contributes to climate change. This irresponsible approach is leading to loss of human life as well as catastrophic breakdown of ecosystems.

Please do not let gas and oil fields progress. As a citizen I have frustratingly little power to do anything about climate change beyond my own individual behaviours. I, and millions around the globe, rely on people like you to do the right thing and lead the country towards a greener, healthier, safer future. Thank you.

J0040

Please accept this email as my formal response to the consultation concerning the Jackdaw Field Development, reference D/4260/2021.

I strongly support the approval of the Jackdaw development.

I write both from a personal perspective, as a resident of North-east Scotland who sees directly the importance of the offshore energy industry to local communities, and from a professional perspective as a chartered engineer working in the UK offshore energy sector.

Jackdaw is an advanced project that could make a material and relatively near-term contribution to the United Kingdom's domestic gas supply. At a time when UK Continental Shelf production is declining and the country is increasingly dependent upon imported gas, it would be strategically unwise to prevent the development of a resource that has already been discovered, engineered and substantially constructed within the UK's established regulatory framework.

The UK will continue to consume natural gas during the energy transition. Gas remains important for domestic heating, electricity generation, industry and balancing an electricity system containing increasing levels of intermittent renewable generation. Until demand has been reduced or replaced by reliable alternatives, restricting domestic supply does not eliminate the need for gas. It principally increases dependence on imports.

Imported gas exposes the UK more directly to volatile international markets, geopolitical disruption and competition for global liquefied natural gas cargoes. In some cases, imported LNG also carries additional emissions associated with liquefaction, long-distance shipping and regasification. A complete environmental assessment should therefore consider not only the emissions associated with domestic production, but the realistic source and emissions profile of replacement supplies if Jackdaw does not proceed.

Jackdaw and Rosebank together are expected to provide approximately 10 per cent of UK domestic natural-gas production at peak. Jackdaw's particular value is that it is primarily a gas project and is sufficiently advanced to contribute to supply considerably sooner than a newly discovered or newly designed development.

Its approval would not make the UK self-sufficient or determine retail energy prices on its own. Nevertheless, energy security is strengthened incrementally. Every material volume produced through domestic infrastructure reduces the volume that must be procured from international markets and supports the resilience of the wider UK energy system.

The economic case is also substantial. Together, Rosebank and Jackdaw represent approximately £10.8 billion of private-sector investment, with more than three-quarters expected to be invested in the UK. Published estimates indicate that the two projects could generate £28.7 billion in UK Gross Value Added across their producing lives, including approximately £9.1 billion of supply-chain activity.

The developments are expected to support more than 3,500 jobs at peak construction and sustain around 880 high-quality jobs during production. They are also expected to create or support at least 125 apprenticeships. This is important not only for the present oil and gas industry, but for the preservation and development of the skills needed for

offshore wind, carbon capture and storage, hydrogen and future decommissioning work.

Across the two projects, 198 contracts have reportedly been placed, including contracts with 171 UK-registered companies. More than £3 billion has already been invested across Jackdaw and Rosebank. Jackdaw is therefore not a speculative proposition: substantial engineering, procurement, fabrication, construction and installation work has already taken place.

Approval would allow the UK to receive the benefit of that investment through domestic production, employment, supply-chain revenues and taxation. The two projects are expected to generate approximately £1.4 billion in tax revenues before the expected end of the current Parliament in 2029, increasing to approximately £3.8 billion by 2034. These revenues can contribute to public services and to the investment required for the wider energy transition.

Conversely, refusing approval after major expenditure has been committed would send a damaging signal about the predictability of UK regulation. Offshore developments require many years of engineering, environmental assessment, procurement and construction. Investors in both conventional and renewable energy must have confidence that projects will be judged objectively against published requirements and that the regulatory process will reach decisions in a reasonable and consistent manner.

I recognise the need to assess both operational and downstream greenhouse-gas emissions. That assessment should be robust. However, it should also reflect the actual consequences of each decision. Where UK gas demand persists, refusing domestic production is unlikely to remove the corresponding combustion emissions. It may instead transfer production, employment, tax revenues and regulatory oversight overseas while adding the emissions and security risks associated with imports.

Approval of Jackdaw need not be presented as an alternative to net zero. The UK should continue expanding renewable generation, improving energy efficiency, electrifying heat and transport where practicable, and developing storage and low-carbon technologies. But a credible transition must manage both supply and demand in an orderly way. It should not assume that gas consumption can disappear immediately or that imported energy is environmentally or strategically preferable to domestic production.

I therefore urge the Secretary of State and OPRED to give full weight to Jackdaw's contribution to domestic gas supply, energy resilience, skilled employment, the UK supply chain, public revenues and investor confidence.

Subject to the necessary environmental conditions, monitoring and regulatory controls, I strongly support approval of the Jackdaw Field Development.

J0041

Jackdaw should go ahead full speed, it is critical to UK supply-chain, communities and jobs.

All efforts should be made to maximise UK supply chain content for life of field.

J0042

The development of Jackdaw must be done as soon as possible. It is vital for our energy security

J0043

The Jackdaw field must be developed as soon as possible to help with our energy security.

J0044

I am writing to express my support for the Jackdaw gas field development as part of the current public consultation.

I am a young engineer living and working in Scotland. I am submitting these comments in a personal capacity and the views expressed are my own and do not represent those of my employer or any organisation with which I am affiliated.

As someone who expects to live with the consequences of both climate change and energy policy decisions for many decades to come, I believe it is important that the UK adopts a pragmatic approach to the energy transition while maintaining secure and affordable energy supplies.

Firstly, the project would make a meaningful contribution to UK energy security. Jackdaw is a natural gas development which will deliver gas through existing infrastructure to St Fergus before entering the UK gas network, directly contributing to UK energy supply. The field is expected to provide a significant proportion of the UK's domestic gas production and help meet the energy needs of around 1.4 million homes. Unlike oil, which is traded globally and often transported by tanker, gas from Jackdaw will be produced from UK waters and supplied directly into the UK's existing gas infrastructure. At a time of continuing geopolitical uncertainty and volatility in international energy markets, maintaining domestic sources of supply reduces reliance on imports and improves resilience.

Secondly, while natural gas is still a fossil fuel, it remains an important transition fuel. Millions of UK households continue to rely on gas for heating and cooking, while many industries depend on it for both energy and feedstock. Natural gas produces lower carbon dioxide emissions when combusted than oil and significantly less than coal, making it an important part of the UK's transition towards a lower-carbon energy system. However, the UK's demand for gas will not disappear overnight. While the country continues to invest in renewable energy and electrification, there remain practical challenges associated with infrastructure, affordability and grid capacity. In the near term, I believe it is preferable for the UK to meet a greater proportion of its gas demand through domestic production rather than increasing dependence on imports.

Thirdly, I believe the UK offshore industry operates to some of the highest environmental and safety standards in the world. Regulatory bodies such as the Health and Safety Executive (HSE) and the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) provide robust oversight of offshore activities. Producing gas domestically allows the UK to retain accountability and visibility over how its energy is produced, rather than simply transferring production elsewhere. If the UK continues to require natural gas during the transition, it makes sense for as much of that demand as possible to be met under a regulatory framework that prioritises worker safety and environmental protection.

Finally, the economic benefits should not be overlooked. The energy sector supports thousands of highly skilled jobs across Aberdeen, Shetland, the North East of Scotland and the wider UK. Projects such as Jackdaw help sustain employment, supply-chain activity and investment in communities that have developed world-leading expertise in offshore energy. The benefits extend beyond the offshore sector itself. Natural gas remains an important input for industries including chemicals, fertiliser production and manufacturing, all of which play a role in the UK's wider industrial strategy and economic resilience. In addition, the UK upstream oil and gas sector is currently subject to a headline tax rate of 78%, meaning that successful developments can make a substantial contribution to public finances, which can in turn support investment in the UK's future energy transition.

I fully support the UK's ambition to reduce greenhouse-gas emissions and transition towards lower-carbon energy sources. However, approving or rejecting individual UK projects does not immediately remove the country's demand for natural gas. Households, businesses and industry will continue to require gas throughout the transition. The key question is therefore whether that demand is met by domestic production operating under UK regulations, or by increased imports.

The UK faces the dual challenge of maintaining secure and affordable energy supplies while continuing to reduce emissions. In my view, projects such as Jackdaw represent a

practical and balanced way of supporting both objectives. For these reasons, I support the granting of the necessary consents for the Jackdaw development.

J0045

I object in the strongest possible terms to the approval of the Rosebank and Jackdaw fields - an objection I extend equally to Cambo and any future fields.

There is no credible argument in favour of fossil fuel expansion; there is sophistry at best, and outright deception at worst. It's easier to assume corruption than the staggering level of ignorance that would be required for the governmental support.

As you should know, the basin is mature, and offers very little in the way of continued supply. Expansion will ultimately do nothing to extend the longevity of the industry: it will only stack the house, so that it collapses all the more heavily when the basin runs dry. Previous governments have approved every drilling license they could, and North Sea jobs still halved over the span of a decade. 14 years of reckless expansion fuelled the U.K. for little over a month. The basin is in terminal decline, and no posturing will change that - the industry's own PR spin promises only a few hundred permanent jobs and a handful of apprenticeships.

Rosebank threatens the Sponge Belt - a rupture would threaten nearly 20 MPAs, which are barely protected as it is. It rewards the industries who have spent the better part of a century suppressing the truth of the nascent apocalypse so that they could continue to profit. It diverts money to illegal Israeli settlements. By the Treasury's own calculations, infrastructure subsidies mean the public are likely to lose money on the deal. Every single independent review I've read - and I've read many - highlight the sheer economic absurdity of renewed drilling; every single one highlights the need to accelerate the just, urgent transition to renewables

It'll do nothing to curb energy costs. The overwhelming majority of both gas and oil will be sold on the international market, as per legal obligations of companies to maximise shareholder rewards. Even if this weren't true, the U.K. simply lacks the refinery capacity to handle quantities of heavy crude.

This isn't even mentioning the climate catastrophe we are living through this year, and every year to come - the only promise of relief from the heat comes with the collapse of the AMOC.

It's frankly shocking that this is even being considered. It's immoral. It's dangerous. It rightfully exposes the U.K. to litigation, as an intentionally reckless act of climate vandalism. It makes us poorer. It makes us hotter. It commits us to another 25 years of an industry that has had no legitimate function in the last 50.

On a personal note, I work in the intersection of climate change and food security. I know what's coming. Acquiescing to the fossil fuel industry on Day One shows the weakness Burnham will be remembered by. It makes my work, arguably my life, pointless. Why should I despair over others when our enlightened leaders don't? It's getting harder to make myself work. It's getting harder to make myself look. Drill if you want, but I won't wait around for the heat to kill me.

J0046

It would be an utterly delusional decision to take to approve the Rosebank Oil Field and related Jackdaw gas project.

I live in Manchester, and my family are currently breathing in wildfire smoke from the burning moors surrounding us.

We are all deeply fatigued by the seemingly endless, record-breaking heatwave.

When is enough enough? It is clear to every sane mind that we cannot keep drilling for oil.

And this development in particular offers no benefit to anyone. It is a short-term money grab to line rich pockets overseas.

There is no future in drilling for oil. The fossil fuel age is over.

The developments are at complete odds with our environmental policy.

They won't lower our bills or offer any greater energy security.

They will do untold damage to the surrounding area.

We'll give huge tax breaks to the companies involved with these developments just so they can continue destroying the environment.

If this is approved, expect to see a great deal of protest and unhappiness.

Please do the right thing and end this lunacy. NO to Rosebank, NO to Jackdaw.

J0047

I am submitting this as a formal representation to the Secretary of State concerning the current further-information consultation for the Jackdaw Gas Field Development, reference D/4260/2021.

I object to the Secretary of State agreeing to the North Sea Transition Authority granting development consent.

In reaching a decision, I ask the Secretary of State and OPRED to give full and transparent consideration to:

the project's complete lifecycle emissions, including downstream Scope 3 emissions;

the cumulative climate effects of the project alongside other existing and proposed fossil-fuel developments;

compatibility with the United Kingdom's carbon budgets and wider climate commitments;

uncertainty in emissions estimates and the extent to which proposed mitigation measures are demonstrable, additional and enforceable;

whether claims concerning energy security, household bills, employment and industrial benefit are supported by transparent evidence and realistic counterfactual analysis;

the availability of lower-emissions alternatives capable of providing energy security and durable employment; and

the need to ensure that political statements made before the consultation concludes do not pre-determine or compromise the environmental assessment and consent process.

I direct a forestry surveying company and work in a sector in which responsible decisions must be judged over decades and generations. The environmental consequences of approving a project of this duration cannot be treated as secondary to its immediate commercial or political benefits.

I also have nieces and nephews whose future will be affected by decisions made today. The Government's willingness to confront long-term climate risk is influencing whether I feel able to have children myself. I ask that the interests of future generations be given substantive weight.

For these reasons, I request that the Secretary of State refuse to agree to development consent for Jackdaw.

Please acknowledge receipt and confirm that this message will be treated as a formal representation within the current consultation.

J0048

Hello my name is and I writing this email to you in regards to speculation of Andy Burnham possibly allowing new oil and gas fields such as Ross bank and Jackdaw to open up in the UK.

I just want to say how disgusted I am by this, for someone who publicly signed the fossil fuel treaty last year and has made it abundantly clear that he does not think that new fossil fuel projects should be allowed, this is a huge slap in the face.

It feels as though he has been brought off by the fossil fuel lobbyists and I won't stand for this.

I oppose any new oil and gas fields to be allowed to open, not only for our future, but the future of the generations to come. We need more renewable energy, not fossil fuels.

More so don't the members of parliament have children themselves?! Do they not see what type of future that fossil fuels will hand them, I'm not even a mother yet and I'm scared for the future of my unborn children if this is the road we are going down. With the UK having 3 heatwaves in the past few months, we can not afford to have any new fossil fuel projects!!!

Say no to rosebank and jackdaw

J0049

I am writing today to express my deepest of oppositions to the development of North Sea oil and gas field Jackdaw.

It seems to me beyond outrageous to be developing new fossil fuel drill sites while we sit through the hottest summer on record in the UK, watch as thousands around the world die from extreme heat brought on by climate change, and face down a future where climate targets are repeatedly failed to be met. Both future generations and those living in areas most impacted by global climate change must be considered when making energy choices that will have echoing consequences the world over; furthering oil and gas drilling is not the moral, logical, or scientific way forward. The only way forward is to funnel this money into renewable energies and protecting what we still have.

Environmental consequences MUST be held above shareholder profits at this vital point in history. The right choices MUST be made — Jackdaw is not one of them.

J0050

To the Offshore Petroleum Regulator for Environment and Decommissioning,

I am writing to formally log my complete opposition to the Jackdaw Field Development.

As a future healthcare professional, deeply engrained in health equity projects across the UK, including the Deep End International movement, I am witnessing the systemic human cost of the climate crisis firsthand. Heatwaves are prematurely killing our most vulnerable demographics, and the psychological toll is manifesting as widespread climate anxiety across the population. Approving new gas fields directly fuels the degradation of our environment and directly accelerates the strain on our healthcare system.

Proponents of Jackdaw argue that this development is necessary to protect citizens, particularly the elderly, from high energy prices. This is a false premise. The UK energy market is deeply integrated with the global market; adding a marginal amount of gas to international supplies will not shift consumer prices or protect vulnerable demographics from fuel poverty.

If the government’s true priority is protecting the vulnerable and politically active populations from the cost of living, the solution is not the expansion of fossil fuels. The solution is targeted, sustainable investment in social care and NHS efficiency.

By prioritising continuity of care and adequately funding social support structures (far more widely affecting the key social determinants of health, as acknowledged by Julian Tudor Hart), the elderly, the homeless, the working class, and the wider population at large would see immediate, tangible improvements to their daily well-being. Simultaneously, optimising NHS efficiencies would drastically reduce the health service's own environmental footprint by eliminating wasted resources and redundant services.

Incoming Prime Minister Andy Burnham and the Labour government have an obligation to prioritise the long-term resilience of the country over the short-term profits of the fossil fuel industry, and this is a unique, unprecedented opportunity to prove their commitment to this. Using regulatory loopholes to fast-track projects like Jackdaw undermines the government’s foundational environmental pledges. We require systemic, sustainable solutions - not projects that lock us into further ecological damage.

I demand that OPRED reject the Jackdaw Field Development in its entirety.

Your Performance is Our Business

Bilfinger UK Limited
4 Greenhole Place
Bridge of Don
Aberdeen
AB23 8EU

[redacted]

BILFINGER

23rd July 2026

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

Reference Number: D/4260/2021

Subject: Bilfinger Response to the Jackdaw Consultation

Bilfinger welcomes the opportunity to respond to the consultation regarding the Jackdaw gas field development.

As a major engineering, maintenance and industrial services provider operating across the UK, including significant operations in Scotland and the North Sea energy sector, Bilfinger has first-hand experience of the importance of domestic energy projects in supporting employment, investment, skills development and industrial capability across the country.

Bilfinger supports the continued development and operation of the Jackdaw project.

Jackdaw is no longer a proposed development in its early stages. Significant investment has already been committed, infrastructure has been installed and the project is approaching start-up. Decisions relating to projects at this stage should recognise both the substantial investment already made and the confidence that investors, contractors, workers and supply chain businesses have placed in the UK as a destination for long-term energy investment.

The UK continues to require reliable and secure sources of natural gas during the energy transition. Domestic production from the UK Continental Shelf offers a more secure and resilient source of supply than increasing dependence on imported liquefied natural gas (LNG). Maintaining domestic production supports national energy security while reducing exposure to international supply disruptions and market volatility.

From an economic perspective, Jackdaw represents a significant opportunity for the UK and Scottish economies. The project supports high-value employment across engineering, construction, operations, maintenance and specialist technical disciplines. The associated work sustains jobs not only offshore but throughout an extensive UK supply chain that includes fabrication facilities, engineering consultancies, manufacturing businesses and service providers.

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Bilfinger recognises the critical role that projects such as Jackdaw play in supporting skills retention and workforce development. Maintaining a strong project pipeline allows experienced personnel to remain within the UK energy sector while creating opportunities for apprentices, graduates and trainees to develop the competencies that will also be required in future low-carbon industries.

The project will also generate significant tax revenues and wider economic benefits that contribute to public services, regional growth and industrial investment. These benefits should be carefully considered alongside environmental assessments when determining the project's future.

Furthermore, producing gas domestically from UK waters is generally associated with lower lifecycle emissions than importing equivalent volumes of LNG from overseas sources. Continued domestic production therefore has an important role in meeting energy demand while supporting the UK's broader transition objectives.

Bilfinger therefore supports the continued development and operation of the Jackdaw project and believes it represents an important contribution to UK energy security, economic growth, employment and industrial resilience.

Yours sincerely,

[redacted] Asset Performance
Bilfinger UK

[redacted]

D/4260/2021 Response to Public Consultation on Jackdaw Field Development

To: OPRED@Energysecurity.gov.uk

This response urges the Secretary of State to withhold consent to the development of the Jackdaw gas field.

The climate impacts arguments massively outweigh any economic, security or social considerations.

Shell knows that the project will cause more global heating. Their own environmental impact assessment acknowledges that:

> Emissions over the life of the Jackdaw Project have the potential to … contribute to increased global concentrations of atmospheric GHG leading to global warming" (Environmental Statement 2021).

The Environmental Statement makes multiple references to "contribution to global warming" under "potential impacts" of their operations. The developers are now arguing that the contribution will be small. However, the legal principle emerging from the case of Lliuya v RWE (2025 German appeal court) in which one fossil fuel company's contributions to global heating were held to be justiciable suggests that litigation against Shell and its associates could follow in the UK.

The argument that "oil and gas will be part of the transition" needs to be resisted because rather than describing a short-term necessity it encourages further fossil fuel extraction and dependence. To meet the UK's climate targets and mitigate global climate change requires rapid transition away from all fossil fuels.

The economic, social and energy security arguments for this project are not persuasive, see, for example, the Grantham Institute's '5 reasons why going ahead with Rosebank and Jackdaw is bad for the economy' https://www.lse.ac.uk/granthaminstitute/news/5-reasons-why-going-ahead-with-rosebank-and-jackdaw-is-bad-for-the-economy/

We are already experiencing catastrophic climate impacts with devastating loss of life and the considerable financial costs involved in responding to them (as the Stern review forecast in 2006). These disasters outweigh any claimed short-term economic gains (whether in tax receipts, local jobs or profits to fossil fuel company shareholders).

It is difficult to envisage that any responsible government would even seriously consider that those issues could be weighed in the balance.

The UK government needs to show leadership on the transition away from fossil fuels to renewable energy sources, not least because of our country's historic emissions profile. We cannot persuade other countries to stop fossil fuel extraction unless we do it ourselves.

The people involved in this decision should remind themselves of what their children and grandchildren need them to do.

J0053

I am writing to express my vehement opposition to the proposed Jackdaw Field Development (ref: D/4260/2021).

The climate crisis is very real. Heat waves and forest fires rage around the world, costing lives, livelihoods and habitats. The scenes around us are frankly terrifying. Action on climate change has been far too slow - a fact exacerbated by decades of well-documented cover-ups and pro-fossil-fuel lobbying efforts, which continue to this day. (There is plenty of excellent research on this; see, for instance, Benjamin Franta, 'Early oil industry disinformation on global warming,' *Environmental Politics*, *30*(4), 663–668. https://doi.org/10.1080/09644016.2020.1863703; and William F. Lamb et al., 'Discourses of climate delay.' *Global Sustainability*. 2020;3:e17. doi:10.1017/sus.2020.13)

The world simply cannot afford the CO_2 emissions that drilling for more oil and gas would unleash. Nor is it true that such projects would help ordinary UK citizens with energy security, jobs, energy bills, or the economy. This oil would be sold in foreign markets, and would thus be of no benefit to the UK. It would benefit fossil fuel company executives first and foremost, while contributing to the horrific suffering of living beings around the world as the climate crisis worsens.

It is unethical, morally bankrupt, and completely unthinkable that the UK government could betray its net-zero commitments, as set out in the 2008 Climate Change Act, with initiatives such as the Jackdaw oil field development. I stand vehemently opposed to this and all other new oil drilling expeditions.

If energy security is the concern here - and, according to industry lobbyists, the promise of such new oil-drilling projects - consider this: like so many others, what I want is a government that fosters the UK's energy security by fully supporting the transition to sustainable energy. I want to see increased support for the transition away from fossil fuels in homes and businesses, and increased support for energy companies that are doing excellent work in wind and solar power, while holding no stakes whatsoever in oil and gas.

I want to see fossil fuel companies pay for the damage they have caused: be held legally and financially responsible for reparations to offset some of the coming damages the climate crisis will cause. I want to see governments that collude with Big Oil at the expense of the entire planet held fully accountable for their actions.

I also want to see close scrutiny of those consuming too much oil, gas, and other vital resources. As citizens are being told to watch their water and energy consumption, the UK has given the green light to massive data centre developments, which will consume unthinkable amounts of energy and water, while leaving ordinary citizens to

deal with the consequences, including increased CO_2 emissions, increased water pollution, and increased household bills. These projects must be stopped; they are tremendous threats to our energy security.

The path to energy security does not lie in developing more big oil projects. It lies in curbing the overconsumption of fossil fuel, and accelerating the transition to green energy.

J0054

Anyone opposing the Jackdaw development is blind to the needs of the nation.

J0055

The government's continued blocking of North Sea oil and gas exploration/development is directly sabotaging:

1. Energy security

2. Employment

3. British engineering excellence

4. Balance of trade

5. Tax income

6. Wellbeing of Aberdeen and Aberdonians

Arguably this Labour government is simply an agent of Russia and Russian interests.

The SNP are not far behind.

J0056

As a resident and business owner in Aberdeen I would like to bring to your attention-

Britain should make use of domestic energy resources rather than increasing reliance on imports.

Jackdaw and Rosebank have already attracted substantial investment and are at an advanced stage of development.

The projects will support thousands of high-quality jobs, apprenticeships and supply chain businesses across Scotland and the UK.

Domestic production strengthens energy security while generating tax revenues that support public services.

J0057

The UK needs to plan for and continue transition from Oil and Gas activity, however our own demand for Oil and Gas will continue for decades to come.

This transition must be exactly that and not an approach which prematurely turns off the taps before the infrastructure and markets are in place to support a move to the alternatives.

The idea that we want to be NET Zero and we achieve this by shutting down our own industry and importing the Oil and Gas we then require is lunacy.

The carbon footprint on the planet is actually worse in this case as the UK is one the most efficient in the world when it comes to extraction, and the emissions then shipping the product in from all corners of the world further increase the impact on the planet.

We are not doing our best for the planet with this approach it is actually worse than continuing to produce from our own reserves.... and in doing so it also helps fund the treasury and support the economy across the entirety of the UK, not just the North East of Scotland.

We should be looking at means to maximise production and exploration for the next 30-40 years as a controlled plan alongside transition activity and investment required in the UK Grid to support the change.

J0058

I am writing to express my strong support for the continued development of the Rosebank and Jackdaw projects.

Britain should make full use of its own domestic energy resources rather than becoming increasingly reliant on imported oil and gas. Developing our own resources helps strengthen the UK's energy resilience while reducing dependence on overseas suppliers.

Rosebank and Jackdaw have already attracted substantial investment and are at an advanced stage of development. Delaying or preventing these projects from proceeding would undermine investor confidence and risk wasting significant investment that has already been committed.

The projects will support thousands of high-quality jobs, apprenticeships and supply chain businesses across Scotland and the wider UK. They represent an important opportunity to sustain skilled employment and maintain the expertise that is essential to the UK's energy sector.

In addition to supporting employment, domestic production strengthens the UK's energy security and generates valuable tax revenues that help fund vital public services.

It is also important to recognise the environmental benefits of domestic production. Producing oil and gas in UK waters is associated with significantly lower emissions than importing equivalent liquefied natural gas (LNG) from overseas, making UK production a more responsible option while the country continues its transition to a lower-carbon energy system.

For these reasons, I urge you to support the continued development of the Rosebank and Jackdaw projects as part of a balanced approach to ensuring the UK's energy security, economic prosperity, and responsible energy transition.

J0059

I'm responding to these consultations not as an industry voice or a campaigner, but as someone who grew up in Aberdeen because of oil and gas.

My father came to Aberdeen from the States in the 1970s, drawn by the boom. He was a drilling consultant. I grew up here. And what I remember and what I think gets lost in the debate now is that this was a city that worked. The streets were busy. People had money in their pockets and they spent it in the city. There were opportunities for work everywhere you looked and not just on the rigs; the engineering firms, the supply base, the cafes, the pubs, the schools etc. Aberdeen was rich and it was vibrant and it was a place people wanted to come to, not leave from.

That's the part I want people in Westminster and in the regulator's office to understand. This isn't abstract to us. So many of the people we know; family, friends, the people I grew up with, we all rely on this industry for work. And more and more of them are having to go abroad, or relocate, just to keep doing what they've always done. I watch extremely skilled people I've known my whole life packing up and heading to the US, to the Middle East, to West Africa, to Oz because the work isn't here anymore. It's sad and it's a shame and it didn't have to be this way.

When the boom was here, when the money was rolling through the city, we didn't invest in Aberdeen the way we should have. We didn't diversify enough, we didn't build enough, we didn't future-proof the way a city in that position should have. But the answer to that failure isn't to pull the rug out from under the people who are still here (and willing). The answer is to use what's left, projects like Jackdaw, like Rosebank and

the others behind them, to buy the time and the investment to actually fix it. To retrain, to build out renewables properly, to give the next generation something to stay for. You don't manage a just transition by switching the lights off first and planning the new grid later.

Jackdaw and Rosebank are real. They're billions of pounds of investment, they're years of work for the supply chain and they're the difference between Aberdeen having a bridge to the next chapter and Aberdeen being told to find its own way across the gap. I'd like to ask the regulator and the government to consent these projects without further delay. Not because the climate question doesn't matter but because the human cost of delay is real too and it's being paid by people I know.

I'm not asking for the boom back. I'm asking for the chance to land this properly.

J0060

As the owner of a small business in Aberdeenshire we rely on work from the oil industry to keep our company viable. We employ 6 people locally. The Jackdaw development will provide an important economic boost to an area which is suffering significantly under idealistic ideas that we can prevent global warming ourselves. There is one thing trying to lead by example but we are just trading a good feeling within ourselves that we are doing 'the right thing' against importing oil and gas from abroad at a much greater environmental impact. We should strive to reduce our reliance on expensive environmentally damaging imports and concentrate on better managing our own production to make that as environmentally clean as possible while providing this country with employment, investment and tax revenues. At the same time we should be tackling the demand for oil and gas in the UK to reduce our consumption. While the demand is there the supply will be found if not from the UK then from elsewhere at a greater environmental cost.

The political idealism of the current stance on UK oil and gas is misplaced and is just moving the problem elsewhere so we can congratulate ourselves on how well we are doing.

The Jackdaw development should be allowed to go ahead and we should be actively pursuing oil and gas exploration on the UKCS so we have control over the way it is produced and minimise the environmental impact while meeting current demand in the UK.

J0061

I am recently retired from over 30 years working in the oil and gas industry and I am continually amazed at the profound lack of basic understanding and appreciation expressed by UK politicians about the UK Oil and Gas industry.

This is an industry that has delivered significant benefits to the UK over the last 40+ years - not just to the UK Exchequer, but to countless communities throughout the UK via the employment it has generated and also to the significant balance of payments benefits generated through the export of world-class UK technology and expertise to the wider world.

The environmental consequences of the use of hydrocarbons and the need for "net zero" is acknowledged by the oil and gas industry but when the Government itself states that we will need oil and gas "for years to come" it is essential that we utilise our own resources rather than pay others and simply "offshore" the liability for the generation of greenhouse gases.

To have a Government that is willing to decimate an entire local industry simply to be able to "demonstrate" its "green" credentials without actually achieving a meaningful global reduction in CO2 emissions is simply engaged in economic vandalism purely for the sake of political dogma. I am old enough to remember the Labour Part's response to the Conservative closure of the coal mines and the devastating effect that had on local communities. To see a Labour Government display the exact same contempt of the North-East of Scotland is truly sickening..

I therefore strongly support the approval of the Jackdaw development and others.

J0062

I am submitting this response as the Managing Director of an Aberdeen-based engineering company that supports the offshore energy industry.

My view is that projects such as Jackdaw are important because they provide certainty for workers, supply chain companies, and communities that depend on the sector. For businesses like ours, long-term investment decisions are driven by confidence that approved projects can progress and be delivered.

The offshore energy industry supports a large network of specialist companies, many of which are small and medium-sized businesses. These companies invest in people, facilities, training, equipment and innovation based on expected demand. Delays or uncertainty can make those investment decisions much more difficult and can result in skills and capability being lost from the UK.

The UK has world-class energy skills and a capable supply chain built up over decades. Once these skills and businesses are lost, they are extremely difficult to rebuild. A

stable environment for investment is therefore important not only for today's jobs but for maintaining the capability the UK will need for both existing energy production and the energy transition.

While I fully support the transition to lower-carbon energy systems, I believe this should be achieved in a practical and balanced way. The UK will continue to require oil and gas for many years to come, and it makes sense to utilise domestic resources produced under UK environmental and regulatory standards rather than increase reliance on imports.

From my perspective, the most important issue is providing a stable and predictable environment for investment. Businesses can adapt to change, but it is much harder to plan, recruit, train and invest when there is uncertainty about whether approved projects will proceed.

Jackdaw represents an opportunity to support jobs, maintain critical skills, strengthen the UK supply chain and contribute to energy security while the transition to a lower-carbon future continues. For businesses like ours, projects such as Jackdaw help create the confidence needed to invest in people, facilities and long-term capability. For these reasons, I support the project progressing

J0063

I am writing to express my support for the Jackdaw gas field development.

As an HSE Manager working in Aberdeen's offshore energy sector, I recognise the importance of domestic gas production in maintaining the UK's energy security and supporting jobs throughout the industry. Jackdaw is particularly important because it is already at an advanced stage of development, with substantial investment having been committed and key infrastructure already installed.

The UK continues to rely heavily on natural gas for heating homes, generating electricity and supporting industry. In my view, it is far better for this demand to be met through responsibly produced domestic gas than through increased imports from overseas. Domestic production provides greater control over safety, environmental performance and security of supply.

Projects such as Jackdaw are also vital for sustaining employment across the offshore sector. My own role, and the roles of many others throughout the industry, rely on continued investment in developments that create long-term operational activity. The project supports not only offshore jobs but also a wide range of businesses across the supply chain, from engineering and fabrication to logistics, maintenance and specialist support services.

The North Sea has developed a highly skilled workforce with world-class expertise in safe and responsible offshore operations. Continued developments such as Jackdaw help retain these skills, create opportunities for apprentices and younger workers, and ensure the UK remains competitive in the global energy sector.

For these reasons, I support the progression of the Jackdaw development. The project will strengthen the UK's energy security, support employment and economic growth, and make use of domestic resources that can be produced to high environmental and safety standards.

J0064

I am writing to express my support for the continued development of the UK’s domestic oil and gas resources, and in particular for strategically important projects such as Jackdaw and Rosebank.

At a time when energy security and economic resilience remain critical concerns, I believe the UK should make responsible use of the energy resources available within its own waters rather than becoming increasingly dependent on imported energy.

Significant investment has already been committed to Jackdaw and Rosebank, and both projects are at an advanced stage of development. Progressing these developments would provide much-needed confidence in the UK energy sector and help support thousands of highly skilled jobs, apprenticeships and businesses throughout the supply chain, both in Scotland and across the wider UK.

Domestic energy production also makes an important contribution to the UK's energy security and economy. The industry generates substantial tax revenues that help fund public services, while retaining investment, employment and economic activity within the UK.

There is also an important environmental consideration. Where the UK continues to require oil and gas during the energy transition, producing these resources domestically can have a significantly lower associated emissions footprint than relying on imported alternatives such as LNG transported over considerable distances.

The UK has developed a world-class energy industry, supported by an extensive and highly skilled supply chain. I would therefore urge the Government to provide the clarity and confidence needed to enable responsible investment in domestic production, including progressing projects such as Jackdaw and Rosebank, while the UK continues its transition towards a lower-carbon energy system.

J0065

I am writing to submit my representation in support of the Jackdaw development.

I live in Inverurie in the North-east of Scotland. Energy is not an abstract political subject in this area. It affects real workers, families, businesses and communities throughout Aberdeen, Aberdeenshire and the wider Scottish supply chain.

The United Kingdom continues to use substantial quantities of gas for heating homes, generating electricity and supporting industry. Until that demand can be reduced and replaced reliably, I believe the country should produce a sensible proportion of its requirements domestically rather than becoming increasingly dependent on imported gas.

Domestic production provides greater control over environmental and safety standards. It also supports British employment, investment, engineering expertise and tax revenues. Importing additional liquefied natural gas from overseas does not make the emissions associated with our consumption disappear, particularly when liquefaction and long-distance transportation are taken into account.

Jackdaw is not an early-stage proposal. Considerable investment and construction work have already taken place, and the project is approaching the point at which it could contribute gas to the United Kingdom. Preventing it from proceeding at this advanced stage would not remove the country's need for gas. It would make it more likely that equivalent energy would have to be purchased from overseas.

The North-east has developed generations of highly skilled workers and specialist businesses through the offshore energy sector. These workers and businesses will also be essential to the development of offshore wind, carbon capture, hydrogen and other lower-carbon technologies. A fair and orderly transition should retain those skills and communities instead of creating an unnecessary economic shock.

I understand the concerns regarding climate change and downstream emissions. Those concerns must be considered seriously, and Jackdaw should operate under strong environmental controls with effective monitoring and measures to reduce operational emissions.

However, the environmental assessment should also recognise the practical reality that rejecting a domestic project does not automatically reduce UK energy consumption. Unless demand is reduced at the same time, the likely result is greater reliance on imported energy, with the associated economic, security and environmental consequences.

Jackdaw can contribute to energy security while supporting skilled employment and the North-east economy during the transition to cleaner energy. For these reasons, I ask the Secretary of State to allow the project to proceed, subject to appropriate environmental safeguards.

Please record this as a formal representation in support of the project.

J0066

I strongly support the continued development of the Jackdaw and Rosebank projects. Responsible domestic oil and gas production is essential for the UK's energy security, supports thousands of skilled jobs across Scotland, and generates significant investment and tax revenues for the economy. Producing our own energy to high environmental standards is a more sustainable and practical option than increasing reliance on imported fuels, and these projects will play an important role in supporting the UK's transition to a secure, balanced energy future.

J0067

Re: Jackdaw (Reference D/4260/2021)

I am writing in support of both the Rosebank and Jackdaw developments.

As the Managing Director of an Aberdeen-based company that has supplied PPE and protective workwear to the UK offshore oil and gas industry for more than 20 years, I have seen first-hand the importance these developments have, not only for operators but for hundreds of companies throughout the supply chain.

Our business employs local people, supports apprenticeships, works with UK manufacturers where possible, and provides specialist protective equipment that helps keep offshore workers safe. The continuation of projects such as Rosebank and Jackdaw provides confidence for businesses like ours to invest in stock, develop new products, retain skilled staff and continue supporting customers operating in the UK Continental Shelf.

These projects have already attracted significant investment and are well advanced. Delaying or preventing them at this stage risks undermining confidence in the UK as a place to invest, with consequences extending far beyond the operators themselves. Thousands of jobs across engineering, manufacturing, logistics, fabrication, maintenance and support services depend on a stable pipeline of offshore activity.

From an energy security perspective, I believe it is sensible that the UK continues to utilise its own natural resources while demand for oil and gas remains. The UK will continue to require these products for many years during the energy transition. Producing them domestically under one of the world's most highly regulated environmental and safety regimes is preferable to importing them from overseas, where transportation adds further emissions and environmental standards may not be as stringent.

The North Sea industry has also been at the forefront of improving environmental performance and reducing emissions. Many companies across the supply chain,

including our own, have invested heavily in more sustainable practices, lower-impact products and operational improvements. Continued domestic production allows these improvements to continue while supporting the UK's transition towards lower-carbon energy.

The economic importance of these developments to Aberdeen, the North-east of Scotland and the wider UK cannot be overstated. Our region has built decades of expertise that is now supporting offshore wind, carbon capture and hydrogen alongside oil and gas. Maintaining a healthy offshore sector provides the skills, businesses and investment that will also help deliver the wider energy transition.

For these reasons, I respectfully ask that both the Rosebank and Jackdaw developments receive the necessary approvals to proceed.

Thank you for considering my comments.

J0069

I'm a Dad, a Grandad and a retired oil and gas sector worker. I believe we must across the planet reduce fossil fuel emissions in the interest of the climate that our successors will inherit. So, I am in favour of policies that transition us to lower carbon emissions.

But like any transition it has to be managed.

Try to drive a car straight from 1st into 6th gear in a frantic attempt to get up to speed, you will surely stall the engine, and maybe damage it.

Try to grow a business too fast, you'll run out of working capital and go bust.

When I look at the recent government policies, the approach to energy transition has been idealism, not management; not a managed transition but a cliff edge, or brick wall if you prefer.

The effect has been to lose jobs, diminishing the strength of our industry base and supply chain capability. The regional impact on the North East of Scotland is self-evident.

But while brick-walling the energy supply side, not only upstream production but downstream refining as well, demand has continued and is met by imports that have a higher carbon footprint and create wealth for other countries. Thoroughly bonkers.

That's why I am in favour of Rosebank and Jackdaw being approved for production.

I want to see those fields used to meet domestic supply and energy security, not imports, to sustain our industrial capability and the taxation revenues helping to power and accelerate a competently managed transition to a lower carbon energy mix.

J0070

I support the development of Jackdaw and believe that the UK should make responsible use of its own domestic energy resources while we continue to transition towards a lower-carbon future.

Energy security is vital for households, businesses and communities across Britain. Relying increasingly on imported energy leaves the country more exposed to international markets, supply disruptions and price volatility. Developing our own resources in UK waters allows us to maintain greater control over our energy supply while supporting the wider economy.

Jackdaw have already attracted significant investment and are at an advanced stage of development. These projects represent major commitments that can deliver long-term benefits across Scotland and the wider UK. They will support thousands of high-quality jobs, apprenticeships and opportunities for businesses throughout the supply chain, helping to maintain valuable skills and expertise within the UK energy sector.

Domestic oil and gas production also provides important economic benefits through tax revenues that contribute towards funding essential public services. Supporting responsible production in UK waters helps ensure that the economic value of our energy resources benefits communities and the country as a whole.

It is also important to consider the environmental impact of where our energy comes from. Producing oil and gas in UK waters has significantly lower associated emissions than importing equivalent supplies of liquefied natural gas from overseas. If the UK continues to need oil and gas during the energy transition, it makes sense to source as much as possible from regulated domestic production rather than relying on higher-emission imports.

The development of Jackdaw and Rosebank should therefore be viewed as part of a balanced approach to energy policy: protecting energy security, supporting jobs and investment, and ensuring that the UK has the resources it needs while progressing towards its long-term climate goals.

I urge decision-makers to recognise the importance of these projects and approve their development for the benefit of workers, businesses, communities and energy consumers across Scotland and the UK.

J0071

I am extremely keen that the Jackdaw and Rosebank developments are allowed.

I am a small investor and have invested in UK oil and gas companies for many years. I have also invested in renewable energy through Hydrogen One, ITM Power, Ceres, Next

Energy Solar, and Greencoat UK Wind. I am far from being a climate change denier. I have lost at least £20,000 from the collapse in oils and gas company share prices, albeit those losses have partly reversed since the start of the Iran war.

My main complaint about the government's policies regarding Net Zero is that the economic harm is huge and there is no pragmatism. In fact I would go as far as saying that the current approach to exploiting the existing resources in the North Sea is beyond stupid. The UK is in a terrible place scarcely able to defend itself and destroying industries in pursuit of ridiculous goals which will have little impact on climate change. I would support any common sense reduction in use of fossil fuels but that the UK should take lead the world whilst the UK is such decline is completely and totally ridiculous.

The politics have been heavily affected by the BBC which has actively promoted Ed Milliband and refused to provide any mainstream news coverage of the job losses and damage being done to UK oil and gas sector. The people are genuinely ignorant of the facts.

The damage done by the EPL is enormous. The UK government is influenced by public opinion which is based on lies, or lack of nuance. The old adage that 'its about the economy stupid' is totally misunderstood when people listen to siren voices that promise things which cannot possibly be achieved. The costs of achieving net Zero are shrouded in secrecy and sleight of hand by politicians.

The Jackdaw and Rosebank developments are simple common sense. The fact that it has taken Donald Trump to get us to address the issue again is a huge indictment of our government over the last 10 years.

J0072

I write to you today to urge you to proceed with approval of the Jackdaw project in the North Sea. I am an industry professional with over 40 years experience and at the same committed to the Energy Transition towards Net Zero - however the transition must proceed in a pragmatic way that makes good economic and business sense for the UK as a whole.

The UK will continue to need oil and gas resources for next few decades to meet our own domestic requirements and it is only logical to use our own UK resources rather than import these from overseas for at least four reasons.

Firstly UK oil and gas is developed and produced under the highest of global environmental standards and carries a much lower carbon dioxide emissions footprint than imports - especially true for imported LNG from the US and qatar, as an alternative to gas piped directly from the North Sea into our National Grid. The carbon doixide footprint of oil and gas produced from the UK waters has approximately 25% of the average footprint from oil, gas and LNG imported from overseas.

Secondly the domestic production improves our energy security by being piped direct from the North Sea to onshore UK rather than being dependent upon imports of say Russian gas or Qatar LNG - both of which have been compromised by security interruptions recently.

Thirdly the UK oil and gas production generates huge tax receipts for the UK Treasury by direct taxation and levies paid by the oil and gas Operators in UK waters as well as corporation tax on operations by companies in the North Sea and secondly from significant income tax receipts from North Sea employees working offshore, in Aberdeen and associated areas.

Finally a timely and positive development decision for Jackdaw will secure jobs for UK workers in the North Sea and onshore which are currently being lost at an alarming rate. When those jobs are lost they are not replaced at the same rate by the transition - they are lost for good and the skills, engineering capabilities of companies and individuals have and will continue to relocate to opportunities elsewhere. Many of these skills and engineering knowhow are the same as are required to enable the transition especially in engineering and supply chain offshore wind.

J0073

I totally support the Jackdaw field development and its abilities to supply the UK with much-needed energy.

The fools that reject this will in time rue their idiotic decision not to.

J0074

Comments from retired corporate banker with 30+ years supporting O&G sector and supporting supply chain businesses:-

Given the ever present uncertainties of geopolitics it makes no sense not to fully develop the Jackdaw and Rosebank projects which have over a long period attracted substantial investment from businesses that have already demonstrated the need to seek alternative overseas projects. Oil & Gas exploration and development is financially a high risk sector. It is a highly integrated industry supporting a complex supply chain and high quality jobs across the UK. Given the complexity of the sector certain fields will simply not be viable unless developed in a timely manner, as existing offshore infrastructure degenerates and supply chains collapse. The UK needs to make use of all readily available domestic energy sources and reduce dependency on foreign imports with higher associated environmental impacts. UK energy security is essential and it is widely accepted O&G will remain part of the energy mix for decades to come – the UK Government should promote development of the resources we have.

J0075

I have been involved in the energy sector since the early 1990s in various technical, commercial and contractual roles, working across the industry landscape from major contracting companies through to large and small independent oil and gas operators.

Given my experience, I am concerned that the approval process for these two developments, representing investment of more than £3 billion, appears to remain unresolved despite the operators having resubmitted the requested documentation.

The UK is responsible for approximately 1% of global greenhouse gas emissions. Decisions on domestic energy production should therefore be considered in the wider context of global emissions, energy security and the UK's future energy requirements.

I hope the Department will now be able to conclude these determinations promptly, taking account of the following considerations:

- Significant investment commitment has already been made, with the Jackdaw platform physically installed and undergoing commissioning activities in readiness for start-up.
- The FPSO for Rosebank has already transited to the west of Shetland development location.
- Industry estimates suggest that approval of these projects could contribute around £30 billion to the UK economy.
- The developments would provide a significant boost to employment through supply chain, construction, commissioning and operational roles, potentially supporting in excess of 4,000 positions.
- Estimated tax revenues during this Parliament are in excess of £1.4 billion, rising to potentially £4 billion by 2034.
- Domestic production would reduce reliance on imported energy resources, improving security of supply.
- Production from the UK Continental Shelf is generally associated with a lower carbon intensity than imported LNG, while maintaining robust environmental standards and regulatory oversight.

In conclusion, I recognise the importance of maintaining robust environmental assessment and regulatory standards. However, given the significant investment already committed, the strategic importance of domestic energy supply, and the potential economic benefits to the UK, I believe these developments now warrant timely determination. A clear decision would provide certainty for industry, the supply chain,

employees and the wider UK economy while ensuring future energy requirements are met responsibly.

J0076

I am writing in support of the Jackdaw development, reference D/4260/2021.

I am the Managing Director of engineering, manufacturing, rental and service business that has been operating for 30 years. We employ around 50 people, including approximately five apprentices.

Less than half of our revenue comes from oil and gas. We also work across aquaculture, renewables, marine and defence, so our support for Jackdaw is not based on being wholly dependent on the sector. It is based on our wider experience of energy, engineering, skills and supply-chain investment.

Energy security is not simply about price. It is also about the physical availability, reliability and resilience of energy supplies. Even under credible net-zero pathways, the UK is expected to require around 15 billion barrels of oil and gas equivalent between now and 2050. The real question is whether more of that requirement is produced responsibly in the UK or imported from overseas.

UK oil and gas is produced under some of the highest environmental and regulatory standards in the world. Domestic gas also avoids the additional emissions associated with liquefaction, long-distance shipping and regasification of imported LNG. Rejecting domestic production does not remove demand or global emissions. It simply transfers production, jobs, tax receipts and energy security overseas.

Jackdaw is already at an advanced stage, with substantial investment committed and infrastructure installed. It could make a meaningful contribution to UK gas supply and reduce dependence on higher-emission imports.

The industry also supports well over 100,000 highly skilled jobs, substantial tax revenues and a supply chain that will be essential to deliver offshore wind, carbon capture, hydrogen and other future energy projects. It also provides the commercial foundation for companies like ours to train apprentices and develop the next generation of skilled engineers and technicians.

There is not a separate oil and gas supply chain and transition supply chain. The same companies, people and skills are required across oil and gas, renewables, marine, defence and other sectors.

For these reasons, I strongly support the approval of Jackdaw and believe it is compatible with a responsible, secure and economically sustainable transition to net zero.

J0077

I am writing to express my support for the proposed Jackdaw gas field development. From my perspective, this project represents an important opportunity for both the North East of Scotland and the wider UK energy sector.

Working as an accountant within the oil and gas industry, I see daily how essential stable investment and long--term projects are for maintaining employment and supporting the many businesses that rely on offshore activity. Aberdeen's workforce is highly skilled and deeply experienced, but continued job security depends on a steady pipeline of responsible development. Jackdaw would help sustain that stability, protecting livelihoods and ensuring that the region's expertise is not lost.

I also believe Jackdaw can play a meaningful role in strengthening the UK's energy security. Gas remains a critical part of the country's energy mix, particularly as we navigate the transition toward lower--carbon sources. Domestic production helps reduce reliance on imports, supports resilience during periods of global volatility, and ensures that households and industries have access to reliable and affordable energy. Developing Jackdaw within the UK's regulatory framework allows us to meet these needs while continuing to progress toward long--term climate goals.

In my view, projects like Jackdaw strike an important balance: they support skilled employment, reinforce national energy resilience, and contribute to a managed and orderly transition rather than a disruptive one. I hope the government will recognise the value this development could bring to both the region and the country.

Thank you for considering my perspective.

J0078

I would like to add my wholehearted support for the Jackdaw and Rosebank developments.

I am recently retired and was formerly CEO of a technology start-up company which was acquired by a global energy service company. Our technology significantly reduced emissions related to the production of hydrocarbons. The global service company has since relocated our technology abroad with the loss of jobs, including mine. They have also moved many of their UK based jobs to Norway as they understandably see Norway as a more stable and safer oil & gas working environment. This has resulted in more lost jobs, and more lost tax revenue. I therefore have first hand experience of how government policy towards UK oil & gas has been damaging.

I am originally from the Isle of Lewis but have lived in Aberdeen for over 40 years. The visible decline in the city over the last decade is staggering. A city and region with excellent fundamentals and so much potential is being brought to its knees by policy - mainly the government policy which is driven by ideology, which has also influenced local council policies that are damaging to the city with bus gates, traffic obstructions,

hydrogen bus fiasco etc. Over 70% of the population are reliant on cars as the population does not have the critical mass to support a comprehensive public transport service. The answer is surely electric vehicles?

Both, government and council policies, are fighting with business and the people of Aberdeen rather than working together for the benefit of all. The industry realises and supports that moving to green energy is essential but it must be a transition for many different reasons.

Some facts;

We need oil & gas for the foreseeable future. Switching off oil & gas would bring the country to a standstill as we do not have the energy to power our homes, schools, hospitals…. without oil & gas. The fundamentalists who say stop oil & gas are not living in the real world and that should be made patently clear. Everyone realises that moving to green energy is essential but it must be a transition for many different reasons (including the above).

We are importing about half of our oil & gas. Imported oil & gas generates no Uk jobs, generates no tax income for the treasury and has significantly higher emissions than domestic oil & gas production. I believe we are the only country in the world where tariffs are applied to the domestic product. None of this makes any sense whatsoever.

The decline in UK oil & gas production is due to policy and not geology. While the mature oil & gas fields are indeed declining (as all fields do once in production), Rosebank and Jackdaw are examples of where a lot of domestic reserves still exists. Several politicians state that it is due to geology which is at best misleading, otherwise badly misinformed or lying!

The supply chain required for the offshore renewable technologies is moving abroad. This supply chain is much the same as has been serving the domestic oil & gas industry and as it has been declining (because of policy) they are understandably moving abroad where the oil & gas is being produced. This will be very damaging to the introduction of the renewable technologies.

An argument is made that domestic production does not impact the oil price. While that is technically correct it ignores all the taxation revenue that could be used to reduce UK energy prices. It is also within the governments powers to implement policy so that reserves are stored for times of nee. This would be quite straightforward for gas as all domestically gas goes through the UK. The US has the Strategic petroleum reserve which does exactly that.

Domestic production

- **Can deliver the essentially required oil & gas production.**

- **Can safeguard and generate 10's of thousands of jobs across the country.**
- **Reduces carbon emissions (compared to importing).**
- **Generates billions of taxation revenues to the Treasury.**
- **Safeguards the supply chain which is essential for the renewable technology.**

The decision is ridiculously obvious and these developments have to be supported. I honestly cannot think of any pragmatic reason against domestic production.

J0079

I support the development of the Rosebank and Jackdaw oil and gas fields.

The UK will continue to rely on oil and natural gas for many years, even as the transition to lower-carbon energy continues. Forecasts from both government and independent organisationsindicate that demand for these fuels will declineover time but will not disappear in the near term. Given this reality, it is more sensible to produce aproportion of that demand domestically than toincrease reliance on imports.

Restricting UK production does not eliminate demand. If domestic production is reduced while consumption remains broadly unchanged, the UKis likely to import more oil and gas from overseas. Imported fuels can involve longer transportation distances and may be produced under environmental and regulatory standards that differ from those required in the UK. As a result, simply shifting production overseas does not necessarily reduce global greenhouse gas emissions and may, in some circumstances, increase them.

Developing Rosebank and Jackdaw would also provide important economic benefits. These projects support highly skilled employment, strengthen domestic supply chains, generate tax revenues, and contribute to UK GDP. Maintaining a strong offshore energy sector also helps preserve engineering, technical and projectmanagement expertise that will be valuable during the transition to emerging industries suchas offshore wind, carbon capture and storage, and hydrogen.

Energy security should also be a key consideration. Producing more of the UK's energy domestically reduces dependence on imported supplies and provides greater resilience against geopolitical instability and disruptions in international energy markets.

Supporting these developments does not mean abandoning climate ambitions. The UK should continue investing in renewable energy, energy efficiency, electrification, and low-carbon technologies while recognising that oil and gas will remain part of the

energy mix during the transition. A pragmatic approach is to reduce demand over time while meeting remaining demand with responsibly regulated domestic production wherever possible.

For these reasons, I support the approval and development of the Rosebank and Jackdaw fields. I believe this approach better balances environmental objectives with economic prosperity, energy security, and the practical realities of the UK's transition to a lower-carbon economy.

J0080

I am writing to express my strong support for the Jackdaw development.

As the owner of **xxxx**, a specialist engineering consultancy providing pigging and pipeline integrity expertise to the energy industry, I understand the importance of major offshore developments to the UK's energy sector and the extensive supply chain that supports it.

The UK will continue to rely on natural gas for domestic heating, electricity generation and industrial processes for many years as the country progresses through the energy transition. Given this ongoing demand, it is both practical and responsible to utilise domestic energy resources rather than increasing reliance on imported supplies. Domestic production enhances national energy security, reduces exposure to international supply disruptions and helps ensure that economic benefits remain within the UK.

Jackdaw has already attracted substantial investment and is at an advanced stage of development. Significant infrastructure has been installed, and the project is nearing production. At this stage, it is important that the considerable investment already committed is allowed to deliver its intended economic and energy security benefits.

From my perspective as the owner of a specialist engineering consultancy serving the pipeline and offshore sectors, developments such as Jackdaw provide valuable opportunities throughout the supply chain. The project supports highly skilled employment, apprenticeships and technical expertise across Scotland and the wider UK. Companies such as ours, along with numerous engineering, manufacturing and service providers, rely on a healthy and active offshore industry to sustain jobs, investment and innovation.

The economic benefits extend well beyond the operator itself. Major projects create demand for engineering services, inspection activities, maintenance support, pipeline integrity management and numerous other specialist disciplines. Supporting developments such as Jackdaw helps maintain the UK's world-class energy capability and protects the skills base that has been built over decades.

Domestic gas production also generates valuable tax revenues that contribute to public services and wider economic growth. At a time when energy affordability and security remain significant concerns, it is sensible to maximise the benefits of our own resources while maintaining high environmental and operational standards.

Importantly, oil and gas production in UK waters is undertaken under some of the world's most stringent environmental and regulatory requirements. Where gas demand continues to exist, producing gas domestically is associated with significantly lower emissions than importing equivalent LNG supplies from overseas, which require additional processing and transportation.

In my view, Jackdaw is an important project that will contribute to the UK's energy security, create employment opportunities, support businesses throughout the supply chain and deliver economic value for many years to come. As someone working directly within the sector, I recognise the positive impact that projects of this nature have on specialist engineering companies, their employees and the communities they support.

I therefore strongly support the continued development of Jackdaw and encourage the Government to give full consideration to the significant benefits that the project will bring to the UK economy, energy security and industrial capability.

J0081

1. Britain should prioritise the development of its own energy resources instead of increasing reliance on imported energy.
2. Jackdaw and Rosebank have attracted billions in investment and are already at an advanced stage of development.
3. The projects will safeguard and create thousands of high-quality jobs, apprenticeships and opportunities for businesses throughout the UK supply chain.
4. Domestic production strengthens national energy security and generates important tax revenues that support essential public services.
5. UK-produced oil and gas have a significantly lower carbon footprint than imported LNG, making domestic production the more responsible choice.

J0082

Regarding the Jackdaw public consultation, I’d like to make the following points, which I believe should be considered during the decision-making process whether to approve the further development and eventual production.

British families will not directly benefit from the oil that is locally produced if you were to put this in the perspective of lowering bills. This narrative that is repeated regularly by elected officials is correct!

However, what is just and correct is to place this in perspective of the benefits Jackdaw production will bring: Britain should make use of domestic energy resources rather than increasing reliance on imports.

Our economy and daily lives still depend on oil and gas, we are not ready yet to switch off oil and gas. Elected officials will have access to the numbers, being honest and looking after our nations interest is what we ask, because - The projects will support thousands of high-quality jobs, apprenticeships and supply chain businesses across Scotland and the UK. Domestic production strengthens energy security while generating tax revenues that support public services. Producing gas and oil in UK waters has significantly lower associated emissions than importing equivalent LNG supplies from overseas.

J0083

Jackdaw and Rosebank have the potential to create more than 3,500 jobs, contributing substantial economic value and considerable tax revenues. Harnessing our own energy resources is a logical step, mirroring the approach that our more affluent neighbours have successfully pursued for many years.

J0084

I am writing in response to the public consultation on the Jackdaw Field, D/4260/202.

While I fully support the decarbonisation of the economy, a failure to progress the development of the Jackdaw Field will not advance that ambition; will damage UK energy security; and will damage the UK economy.

It would be far better if our energy needs were met through renewables. However, for as long as the UK needs hydrocarbons, it is far better to source these from UK or European waters. If we do not do so whilst this need remains, we will be forced to import these products from further afield, and importation will entail the use of energy contributing to climate change. In terms of UK requirements, the Jackdaw Field is estimated to be capable of producing roughly 6% of current UK gas consumption or heating 1.4 million homes.

Related to the above, whilst the UK continues to require hydrocarbons, failure to source these from UK/European waters must necessarily entail sourcing them from elsewhere, including from areas of political instability or conflict, such as Russia and the Middle East, thereby jeopardising UK energy security. This is not rocket science.

A failure to develop the field would, which has already been the subject of substantial investment, would damage the UK economy. The field could support thousands of high-quality jobs, not only directly but also in the supply chain. This is especially important at present, as, according to Offshore Energies UK (OEUK), around 1,000 North Sea jobs are being lost every month. A 'just transition', which politicians like to talk about, means a phased reduction in oil and gas production in the UK continental shelf, not allowing the industry to fall over a cliff edge. Production from the field would also generate tax revenue for the UK to help fund public services, including health and social care and defence, where there is currently a pressing need for additional investment.

In summary, therefore, a prohibition on further development of the field would simply be an exercise in virtue-signalling that will do nothing to combat climate change whilst simultaneously damaging the UK's economy and energy security.

J0085

As the founder and General Manager of a business that has supported the North Sea energy sector for over 25 years, I wanted to add my voice in support of continued domestic oil and gas production, and specifically the Jackdaw and Rosebank developments.

Both projects are already well advanced, with significant investment committed. Stalling them now would waste that investment and hand the advantage to overseas suppliers, at a time when Britain should be backing its own resources rather than increasing our reliance on imports.

These developments matter well beyond the platforms themselves. They sustain thousands of high-quality jobs, apprenticeships and supply chain businesses right across Scotland and the UK – companies like mine, providing wellness and support services to operators and their workforces, alongside the many engineering, logistics and technical firms that depend on a healthy North Sea sector.

There's also a strategic case. Producing our own oil and gas strengthens the UK's energy security and generates tax revenue that helps fund public services. And on emissions, gas and oil produced here in UK waters carries a significantly lower carbon footprint than the equivalent LNG shipped in from overseas – so backing domestic production isn't just good economics, it's the more responsible environmental choice too.

I'd urge continued support for Jackdaw, Rosebank and the wider industry that so many livelihoods depend on

J0086

Consultation Response regarding the Further Environmental Information and Development Consent for the Jackdaw Field Development

1. Introduction and Personal Context

This representation is submitted by a senior professional working within the energy project delivery sector, based in north-east Scotland. Having spent 27 years managing the execution of complex engineering projects in this region, I am witnessing first-hand the profound, destabilising impact that recent regulatory shifts, fiscal volatility, and legal delays have had on our industry.

The compounding challenges of recent years have created unprecedented uncertainty today, threatening to trigger a permanent collapse of our domestic supply chain tomorrow. This submission strongly advocates for the immediate approval of the Jackdaw field development to secure the survival of the very sector tasked with building the UK's future energy system.

2. The Reality of the Supply Chain: Recent Years, Today, and Tomorrow

- **The Damage of Recent Years:** The industry has suffered from severe fiscal instability and regulatory whiplash. The continuous alteration of the tax framework and the legal overturn of previously granted consents have eroded investor confidence, leading to deferred capital expenditure and the early departure of global tier-one contractors from the UK Continental Shelf (UKCS).
- **The Impact Today:** Today, we are living through an invisible crisis of confidence. Project delivery and operations solutions providers, fabricators, etc, across north-east Scotland are struggling to maintain skilled workforces. Without advanced, flagship projects like Jackdaw and Rosebank moving into active execution, businesses cannot justify keeping highly specialised personnel on the payroll, and assets in region.
- **The Threat for Tomorrow:** If these projects are blocked or further delayed, tomorrow's reality will be a terminal "investment strike." Once this project delivery infrastructure leaves the UK or dismantles itself, it cannot be easily rebuilt. We risk a chaotic, unmanaged decline that destroys the engineering capacity and asset base needed to execute and maintain the green transition.

3. Preserving the Core Engine of the "Just Transition"

The narrative that halting North Sea oil and gas fast-tracks renewable energy ignores the physical realities of project delivery:

- **Skill Transferability:** The exact engineering competencies, marine logistics, heavy fabrication capacity, and subsea expertise required for Jackdaw and Rosebank are identical to those required for ScotWind offshore wind deployment, carbon capture and storage (CCS), and hydrogen infrastructure.
- **Anchoring the Workforce:** Forcing a premature halt to oil and gas developments before green energy markets reach industrial-scale maturity means skilled workers will continue to move overseas. The UK will lose its world-class project delivery workforce to competitive basins abroad, forcing the country to import both its future energy and the foreign labour needed to build its renewables.

4. Economic Security and Public Revenues

Advanced projects like Rosebank represent nearly £8.7 billion in private sector investment. Together with Jackdaw, they promise to unlock over £28 billion in UK gross value added (GVA).

- **Supporting the Local Economy:** This investment directly translates into high-quality jobs, technical apprenticeships, and thriving supply chain businesses across Scotland and the wider UK.
- **Tax Contributions:** The tax revenues generated by these domestic fields under the Energy Profits Levy are vital to funding the public services and regional infrastructure that support our communities through this economic transition.

5. Lowering Lifecycle Carbon Emissions

From an environmental delivery perspective, blocking domestic production is counterproductive to global climate goals:

- **Preventing Carbon Leakage:** Halting UK production does not diminish domestic demand; it simply substitutes locally produced gas and oil with imports.
- **Lower Extraction Intensity:** Producing gas locally through existing hubs carries a vastly lower carbon footprint than liquefying, shipping, and regasifying LNG imported from overseas.

6. Conclusion

The choice facing the Secretary of State and OPRED is not between fossil fuels and a green future. It is a choice between an orderly transition managed by a thriving domestic supply chain, or a chaotic decline that offshores our energy dependence and destroys our industrial capacity. As someone seeing the daily erosion of our sector's confidence, I urge the regulator to grant development consents for Jackdaw and Rosebank immediately to anchor north-east Scotland’s workforce and secure the UK's energy future.

J0087

As a business owner, and resident of Aberdeenshire, I wish to note my support for future development and production from the Jackdaw and Rosebank sites.

I understand significant investment has already been made towards these two opportunities.

In the current geopolitical setting, domestic energy production and security, along with the tax, employment, training and other fiscal benefits seems absolutely essential to our precarious national.

I believe also that as such oil and gas resources would be recovered responsibly, and that the carbon footprint of such energy sources would be cleaner than the current imported shipments.

I trust those involved will take a pragmatic approach to our national security and fiscal needs.

J0088

As a professional working within the UK offshore energy sector, I am writing to express my full and unequivocal support for the progression of the Jackdaw and Rosebank developments.

Having spent years working directly on safety, emergency response, and operations across North Sea assets, I understand firsthand that projects of this scale are fundamental to sustaining the UK's energy security, highly skilled employment, and regional economic stability.

The North-east of Scotland possesses world-class offshore expertise. Unnecessary delays or obstacles to projects that have already seen over £3 billion in capital investment—where infrastructure like the Jackdaw platform is already installed—undermines investor confidence, threatens high-skilled supply chain jobs, and risks increasing our reliance on imported energy with higher carbon footprints.

Jackdaw and Rosebank represent a pragmatic, necessary bridge during the energy transition. They protect over 4,000 UK jobs, contribute billions in direct tax revenues, and provide vital domestic gas production to heat over 1.4 million homes this winter alone.

I strongly urge decision-makers to approve and support the continued delivery of these critical offshore energy assets.

I support the Jackdaw and Rosebank developments for the following key reasons:

1. **Energy Independence:** Britain should prioritize using its own domestic energy resources rather than deepening reliance on imported energy.
2. **Sunk Investment & Readiness:** Jackdaw and Rosebank are not speculative proposals; they have already secured substantial investment and are at an advanced stage of development.
3. **Employment & Skills:** The projects will support thousands of high-quality roles, apprenticeships, and critical supply chain businesses across Scotland and the UK.
4. **Economic & Public Benefit:** Domestic production strengthens UK energy security while generating billions in tax revenues to support public services.
5. **Lower Environmental Impact:** Oil and gas produced in UK waters carries significantly lower emissions than importing equivalent LNG supplies from overseas.

J0089

I am writing in support of the Jackdaw and Rosebank developments.

As CEO, I see first hand the importance of a healthy offshore energy sector to jobs, investment and economic activity across the North East of Scotland and the wider UK. Our business supports vessel owners, operators and supply chain partners serving the offshore industry, and the decisions made on projects such as Jackdaw and Rosebank have a direct impact on confidence, employment and future investment.

From my perspective, these projects are no longer concepts or aspirations. Significant investment has already been committed, infrastructure is in place and work is well advanced. To prevent or delay projects at this stage would send a damaging signal to investors considering future opportunities in the UK energy sector.

The offshore industry has provided generations of highly skilled employment in Scotland and continues to support thousands of workers, apprentices and businesses throughout the supply chain. Those jobs are not limited to operators alone; they extend into engineering, maintenance, ship repair, fabrication, logistics and many other sectors that depend on a strong and active offshore market.

As a business leader, one of my greatest concerns is the impact continued uncertainty is having on our workforce. We are already seeing reduced activity in parts of the market and increasing pressure on companies that have traditionally relied on North Sea

investment. Decisions that undermine confidence in the basin put skilled jobs at risk and make it harder for businesses to invest, train apprentices and provide long term employment opportunities.

The reality is that offshore energy work is increasingly mobile. If opportunities are not available in Scotland and the UK, businesses and workers will have little choice but to look elsewhere. As a company, we are already having to focus more attention on international markets to secure future workload and protect employment. Whilst we will continue to do that, I believe the UK should be doing everything possible to retain investment, skills and economic value at home.

I also believe it is sensible for the UK to make use of its own energy resources rather than increasing reliance on imported oil and gas. Domestic production supports energy security, generates tax revenues and sustains jobs, while UK production generally operates under higher environmental and regulatory standards than many overseas sources.

For these reasons, I strongly support the progression of the Jackdaw and Rosebank developments and encourage the Government to recognise the economic, social and strategic importance of these projects to Scotland, the UK and the thousands of people whose livelihoods depend upon a successful offshore energy sector.

J0090

As a supplier to the North Sea Oil and Gas industry our annual turnover has decreased because of lack of commitment by this Government. Many businesses are struggling in the North East of Scotland and it is crucial for all of us that the go ahead is given for this Project to reduce imports and help create skilled jobs throughout the UK.

J0091

if this numpty Labour Government does not wake up and realize that UK Oil & Gas is on the verge of becoming extinct

by the end of 2026 very very soon its going to be too late ...

Rosebank and Jackdaw are crucial Projects that need full backing of the entire UK English Scottish Welsh Northern Irish

Governing Bodies and all ends of the Political Spectrum

Oil , Gas , Jobs , all over the UK will be gone for good in the same way Thatcher shut the Coal Mines

USE or LOOSE and dare SNOOZE !!!

Never try and kid yourselves like that bunch of buffoons Millibrain Shanks Reeves had the answers for NET ZERO loonacy

just wake up smell the coffee and think what Oil&Gas does on a daily basis within every day life in UK ...from homes to hospitals to industry its used in every shape of daily life one way or another - hugging trees and talking to plants does not cut the mustard !!!

i started my career in 1992 in Oil& Gas Industry working on the Vessels that do Diving , Pipelay , Heavy Lift in all areas of the world

for the Oil & Gas Industry - will i still have a job in 5 years within the Industry - time will tell !!!

J0092

I can confirm my support for a licence in respect of the above to be awarded.

I am passionate about renewables and I am passionate about sustainability. In recent years I have spent time in a personal capacity delivering a zero emission fleet across the bus sector. Indeed I hope to continue this work across other modes.

However the stats indicate that there simply isn't sufficient renewable volume currently to meet all energy needs. This licence needs to be granted so energy needs can be met locally, alongside renewables that are coming on stream.

In conclusion we need an energy policy based on increased local production for gas, oil and renewables. It is not an either or.

Thank you for taking my input into account.

J0093

Aberdeen City is dying on its feet ,so where I am coming from it is only common sense that the said fields are open (and drill baby drill)I worked for oil companies back in eighties until I retired

J0094

WE have been witnessing in Aberdeen a mass exodus and mainly abroad due to the jobs crisis created by this nonsensical idea that you can switch off the north sea oil and everything will be net Zero. Where does the oil come from instead? It is transported in a non sustainable way to our country making us less secure and losing out on much needed income and jobs.

Please please can we have some grown up thinking now that Ed Milliband has departed. We do need to transition to green energy but this is not the way to do it. The Norwegians are laughing all the way to the bank and we should take a lesson from them on the oil front. We keep stopping projects that are already in the pipeline and that is a waste we really cannot afford.

We have put all our local investment projects on hold for the moment because there will be severe consequences in the future. Small promised titbits from the government have done nothing to change the situation and the brain drain continues and everyone is selling up.

J0095

Supporting the Jackdaw and Rosebank developments - Reference number D/4260/2021

I should like to urge you to progress the above developments with the utmost speed. On these projects rest the futures of thousands of families and individuals across the UK. These projects offer the prospect of a large number of highly skilled, high-quality jobs; of providing vital, invaluable apprenticeships for young people without which their prospects are otherwise severely limited; and of supporting a wide range supply chain businesses both across the region and nationally.

I also think it borders on madness that we as a country would import at greater cost and environmental impact the energy we need to heat and light our homes, schools, hospitals and factories when we could access this domestically through Rosebank and Jackdaw.

I would also add that in this increasingly uncertain world, the ability to domestically produce this energy strengthens our energy security while generating tax revenues that support vital public services – it's a win-win.

I therefore hope you will take the right decision to make these projects a reality.

J0096

My name is xxx, and I am 28 years old. I graduated from the University of Aberdeen, and im now living in London working as a Process Engineer for an EPC firm doing large-scale energy projects in the low-carbon and fossil fuel space.

While I would love a world with all renewables, the current transition to green energy is currently not working as we are still dependant on fossil fuels and relying heavily on imports. This is just not the way to go at the moment as Britain should make full use of

its domestic energy resources rather than relying on imports. Supporting local jobs, like myself and many others. Additionally, the jobs created through these projects enable future career growth and development in the energy sector. These all contribute to high-paying, high-skilled and high-quality jobs which are so crucial for this country. These jobs generate good tax for the government as well employing individuals to contribute to their pension funds to take a load of the public sector in the future. By penalising individuals, like myself, and only biasing renewable projects which are manufactured elsewhere in the world, you are actively contributing to jobs reduction.

A balanced and just transition, respecting the requirement for fossil fuel use and maximising our own changes is key to me and many others. We can not be the green engineers of the future if large energy projects like these are not progressed. This is why many young chemical and process engineers at my age are either moving abroad to the middle east, US or Asia where their degree and skills are valued, or they are working in the financial sectors. We are losing skilled engineers at alarming rates because this country does not value us anymore. Please consider these projects and think about the success of our country.

J0097

I feel very strongly that we should use our natural resources when we must rather than use imported resources. I support drill baby drill. I could use my own words but others are more eloquent. The main reasons we should drill baby drill are

Jackdaw and Rosebank have already attracted substantial investment and are at an advanced stage of development.

Domestic production strengthens energy security while generating tax revenues that support public services

The projects will support thousands of high-quality jobs, apprenticeships and supply chain businesses across Scotland and the UK.

Britain should make use of domestic energy resources rather than increasing reliance on imports

Producing gas and oil in UK waters has significantly lower associated emissions than importing equivalent LNG supplies from overseas.

J0098

Public Consultation – Jackdaw Gas Field Development - reference number D/4260/2021

I am writing to express my wholehearted support for the proposed development of the Jackdaw gas field and to encourage the Government to grant the necessary approvals to allow this nationally significant project to proceed without further delay.

The Jackdaw development represents a major opportunity for the United Kingdom. Independent analysis indicates that the project could generate approximately £28.7 billion in economic value, with significant benefits flowing to Scotland and the wider UK economy. It will support thousands of high-quality jobs throughout the construction phase and in long-term operations, create valuable apprenticeship opportunities, strengthen domestic supply chains, and provide substantial tax revenues to the Exchequer. Estimates suggest the project could generate around £1.4 billion in tax revenues before the end of this Parliament and up to £3.8 billion by 2034.

From an energy security perspective, the project is equally compelling. Jackdaw is expected to contribute around 10% of UK gas production and has the potential to produce enough gas this winter to heat approximately 1.4 million homes. Developing our own domestic energy resources will reduce reliance on imported gas, strengthen the UK's energy resilience, and help shield consumers and businesses from international market volatility.

The project has already attracted substantial investment and is at an advanced stage of development. Approval would send a strong signal that the United Kingdom remains committed to responsible investment, supporting confidence across the energy sector and the many businesses that depend upon it.

As a business leader operating a hospitality business in Aberdeen, I have witnessed first-hand the consequences of the current policy environment and the reduction in new oil and gas developments. The impact on the local economy has been significant. Over the past two years, I have had to substantially reduce my staffing requirements as business demand has declined. Footfall across the city has fallen noticeably, consumer spending has weakened, and many skilled individuals and families have chosen to leave the region in search of employment elsewhere. These changes have had a profound effect not only on businesses such as mine but on the wider economic wellbeing of the North East of Scotland.

I fully support the UK's ambition to achieve net zero and recognise the importance of transitioning towards renewable energy. However, that transition must be managed in a way that protects jobs, communities and economic prosperity. At present, the pace of change is not being matched by sufficient alternative employment opportunities or investment. A just transition must be practical, carefully planned and economically sustainable. Until renewable energy is capable of fully meeting our national energy

requirements, responsibly developed domestic gas resources such as Jackdaw have an essential role to play.

Approving the Jackdaw project would represent an important step towards restoring confidence in the North East of Scotland, safeguarding highly skilled employment, strengthening the UK's energy security and delivering significant economic benefits across the country. It would demonstrate that the Government is committed to achieving net zero through a balanced and pragmatic approach that supports both environmental objectives and economic resilience.

I therefore respectfully urge you to approve the Jackdaw development and enable this important project to proceed as soon as possible, for the benefit of the North East of Scotland, the United Kingdom as a whole, and the many businesses and communities that stand to benefit.

Thank you for taking the time to consider my views as part of this consultation. I appreciate your attention to this important matter and hope my comments will assist in your deliberations.

J0099

Having been born in Aberdeen and operated the UK fleet of Emergency Rescue Vessels called North Star for over 40 years it's imperative for the security of the nation in terms of jobs and the economy that these fields are allowed to be developed and further fields are explored with carefully controlled emissions.

We have employed and developed some of the best skills in the World to produce the cleanest energy source right on our doorstep .
These future developments will secure thousands of jobs throughout the Uk and generate huge savings for the country in tax revenue instead of buying expensive and less refined energy from our competitors who will delight in seeing us ticking the zero carbon box too rapidly without making a hair of difference to the world's carbon problems as they continue to develop their own essential supplies in an orchestrated manner that could allow us to adopt renewable energy when we have the infrastructure and resources to pay for it.

If you are so keen to adopt zero carbon emissions rapidly will you never buy another car or fly another plane or switch on your heating?

The whole scenario is economic suicide and cannot be digested other than in a longer

term coherent strategy.

The above projects alone will inject £30Bn into the economy enough to fund our entire Defence budget.

A perceived carbon friendly like Norway drilled 36 wells last year compared to one in the UK sector.

For all these reasons we must act responsibly for our country and the next generation when they ask why did you allow all this to happen ?

J0100

I think the development should go ahead as it will help secure the UK's energy needs. Importing what we already can extract ourselves is a waste of time and resources. It will also create jobs and benefit our economy which is good for the country.

J0101

I was born in 1951. I had a good upbringing but I decided not to follow my father into the National Coal board and commenced work in International Logistics at Prestwick Airport . I married and moved to Aberdeen from Ayr in 1974 to enter into the Oil Service Petrochemical Industry where I worked , developed and brought up a family successfully for the next 50 years . After leaving Ayrshire I had witnessed the political destruction of mining communities and industry promoted by the desire of the then government to diminish , nullify and destroy the Union Power which then proliferated the Industry. This was a political decision of action which saw the destruction of an industry and way of life as a consequence with the mining areas never recovering to this day.

I became part of an exciting and rewarding industry in the 70's , 80's , 90's and 2000 + which presented me with the opportunity of an amazing International career .

I am so saddened and worried with the current Governmental policies which appear to be intended to result in the premature destruction of the North Sea Oil and Gas potential . These policies whilst perhaps different from the "Thatcher" ideals are none the less of an equally "zealot like " blinkered agenda . The similarity is that both policies are imposed on the targeted Industry and area without effective populous recourse .

Whilst I totally agree that we must be working towards a more sustainable policy for the betterment of the environment to be non-reliant on the use of Oil and Gas , we must continue to take advantage of the resources which the North Sea continues to offer . I

believe it is madness to follow blindly fanatical ideas of the “Green” lobby when the rest of the world appears to follow the policy of putting their own economies first.

The destruction of our own UK economy as a point of issue will not change the attitude of the rest of the world super - powers !

We should embrace the fortunate fact that we indeed have the facility of Jackdaw and Rosebank plus the rest of the resource of the North Sea which can assist by improving and contributing to the balance of our economy and to give us a chance to economically progress to a better environment for the future.

I have retired from a wonderful industry and the North East of Scotland was a fabulous place to live and bring up families.

The current Governmental policies is not only destroying the industry unnecessarily but it is also greatly damaging the area and environment in which we currently live.

I do not want my children and grand-children to have to move away just to survive.

I still vividly remember the destruction of the economy and infrastructure of the mining areas of Ayrshire which have never recovered even to this day . I do not want to see this repeated in the North East of Scotland . Please do not delay the permissions of the important and necessary productions developments of Jackdaw and Rosebank any longer.

J0102

It is extremely concerning that this Government are not making use of our resources when we continue to buy in overseas oil and gas

Developing the Jackdaw gas field will enhance our energy security**,** will drive economic investment**,** and preserve skilled domestic jobs during the energy transition.

Please get your act together and do the right thing.

J0103

Please accept this email as evidence of my support for the Jackdaw project as it is my belief that this will have significant benefits for not only the local North East economy but the UK as a whole.

I myself as an offshore worker have been involved on the project assisting in the perforation process of bringing 4 of the wells online at the start of 2026 and have seen first hand the investment already made and how many offshore jobs depend on this project getting full consent and approval .

I would like to highlight the following points -

- Britain or at least Scotland should make use of domestic energy resources rather than increasing reliance on imports.
- As previously mentioned ,Jackdaw and I believe Rosebank have already attracted substantial investment and are at an advanced stage of development.
- Again as previously mentioned the two projects will support thousands of high-quality jobs, apprenticeships that will train the next generation and support future technoligies and supply chain businesses across Scotland and the UK.
- Domestic production strengthens energy security while generating tax revenues that support public services.
- Producing gas and oil in UK waters has significantly lower associated emissions than importing equivalent LNG supplies from overseas.Why should the UK import at greater cost financially and environmentally when we have the resources on our doorstep!

It is my belief that if the UK fail to support these projects we as a country are sounding the death of the oil industry before we have the infrastructure in place to transition to greener energy supplies , we have to allow a transition period and we will need alternative sources of energy until that time maybe we will need both oil and green energy forever but certainly we need it now.

J0104

I am writing to express my strong support for the continued development of domestic oil and gas projects in the UK, with a particular focus on the Jackdaw gas field as well as Rosebank. As the UK navigates its energy transition, maximizing our own domestic resources is essential for economic stability, energy security, and environmental responsibility.

There are several compelling reasons why approving and maintaining support for these projects is in the best interest of the nation:

- **Utilizing Domestic Resources Over Foreign Imports:** Britain should actively make use of its own domestic energy reserves rather than increasing our reliance on imported fossil fuels. Depending on foreign markets exposes the UK to international supply shocks and price volatility.
- **Sunk Capital and Project Readiness:** Both Jackdaw and Rosebank have already attracted substantial private investment and are at an advanced stage of development. Halting or delaying these projects now risks stranding capital and signaling uncertainty to future infrastructure investors.

- **Job Creation and Economic Growth:** Continuing these developments will directly support thousands of high-quality jobs, apprenticeships, and supply chain businesses across Scotland and the wider UK. The expertise within our offshore workforce is precisely what will power the energy transition in the decades ahead.
- **Fiscal Benefits & Public Services:** Domestic production directly strengthens our energy security while generating vital tax revenues through the windfall and corporation taxes. These revenues directly fund the public services and infrastructure we rely on daily.
- **Lower Carbon Footprint than Imports:** According to North Sea Transition Authority data, gas and oil produced in UK waters has a significantly lower carbon footprint than importing equivalent supplies of Liquefied Natural Gas (LNG) from overseas, which requires energy-intensive liquefaction and long-distance maritime transport.

Supporting domestic gas fields like Jackdaw is not a step backward on climate goals; rather, it is a pragmatic bridge that ensures security of supply, protects UK livelihoods, and lowers the emissions intensity of the energy we inevitably consume during the transition.

I urge you to support the continuation of the Jackdaw field and ensure Britain remains capable of meeting its own energy needs securely and responsibly.

J0105

Please take this e-mail as my support for consenting to both Jackdaw and Rosebank Projects get the go ahead.

I was a North Sea Oil and Gas Worker for 20 years and like many other I was made redundant due to the lack of available work.

The governments greatly excessive taxation of Oil Companies has completely killed any future Investment and banning any further exploration and drilling was the final nail in the coffin.

I know of so many people I have worked with over the years that are in the same place as me.

I have now had to look for work overseas as many other people have and will eventually leave the North Sea with very little experienced people.

J0106

Consultation Ref. D/4260/2021 – Jackdaw Consultation

I am writing in response to the consultation regarding the Rosebank and Jackdaw developments.

I strongly support the continued development of these projects and believe they are in the UK's national interest.

Moreover, I strongly believe that Britain should make full use of its own domestic oil and gas resources rather than becoming increasingly reliant on imported energy. Developing our resources in the North Sea strengthens our energy security, reduces dependence on overseas suppliers, and will generate valuable tax revenues that help fund our public services.

The Rosebank and Jackdaw projects have already attracted substantial investment and are at an advanced stage of development. Delaying or preventing these projects from proceeding would undermine investor confidence and risk wasting the significant investment that has already been made.

Both projects have and, if approved, will continue to support thousands of high-quality jobs, apprenticeships, and businesses throughout the supply chain, particularly in Scotland and the North East of England. Working for an offshore services company based in Aberdeen myself, over the past year I have also been part of the team supporting the Jackdaw project for Adura. Through my own experience, I have seen first-hand the skilled employment and economic activity these developments create, not only for those directly involved but for many companies and communities that rely on the offshore energy sector. As a business leader, I can say with certainty that new oil & gas projects such as Jackdaw and Rosebank are also critical for the survival of many businesses in Aberdeen and indeed across the whole of the UK, companies direct and indirectly linked to this crucial sector.

It is also important to recognise that producing oil and gas from the UK Continental Shelf has significantly lower associated emissions than importing equivalent liquefied natural gas from overseas. If the UK continues to require oil and gas during the energy transition, it makes environmental and economic sense to produce as much as possible domestically rather than relying on higher-emission imports. Furthermore, at a time of increasing geopolitical instability and as the Government seeks to increase investment in defence and strengthen the UK's strategic resilience, it makes little sense to become more dependent on imported energy from overseas when we have the resources and expertise to produce it responsibly at home.

I recognise the importance of the transition to lower-carbon energy, but this transition must be managed in a way that protects energy security, supports skilled employment,

and maintains confidence in the UK's energy industry. I, like many others, believe Rosebank and Jackdaw play an important role in achieving that balance

J0107

Good morning i have been invited to give my thoughts on the upcoming events regarding the Rosebank and Jackdaw North Sea project. I can’t understand why this project has taken so long to get permission from the government to go ahead, although i know that we need to go to getting our energy from a more cleaner source in the future, but while we are using oil and gas supplies surely it would be better to use our own oil and gas reserves instead of importing it from other countries. It makes no sense that we are running our oil and gas companies out of business and loosing so many jobs and skills, i don’t think that the government really know what people in this country are thinking about regarding this matter, i go out with lots of different people playing different sports and hobbies and all a vast amount of them are always talking about this subject and saying does this government know what they are doing. So hopefully over the next few weeks this project will get the go ahead and get it started and get more people into work, also many more young people will be able to get into the work place

Thank you for giving me the opportunity to be able to help with this project

J0108

The UK requires increasing gas imports year on year .

Jackdaw is a near term source of gas. Without it , more gas would need to be imported.

Jackdaw production would support hundreds of skilled jobs. Millions of pounds of taxes would be raised for the new chancellor.

It provides better energy security than reliance on LNG tankers from the Middle East and unreliably governed USA.

J0109

For environmental reasons, Jackdaw development should be allowed, enabled and encouraged. Given that both we and our neighbouring countries will remain dependent on fossil fuels for decades to come, we should ensure that we do what's possible to ensure emissions are minimised. That should not be controversial.

Importing fossil fuels comes with a large and well known carbon cost as energy is consumed during shipping (and liquification / regasification for LNG). Leaks in the process are common and methane has about 30 times the long term greenhouse impact of CO2.

Substantial transport emissions are only part of the environmental cost of importing oil and gas. The UK North Sea has the strictest safety and environmental standards in the world. Gas flaring is strictly controlled and regulated in the UK in contrast with other locations where there is little regulatory oversight- producing 400 million tonnes of carbon per year (about the same as the UKs entire carbon footprint).

There's also the matter of which states gas is sourced from, if not the North Sea. Much of it is indirectly sourced from Russia. Stopping North Sea development contributes to our (and Europe's) absurd position of quietly funding Russia to fight Ukraine while loudly funding Ukraine to fight Russia. That war has so far emitted about as much carbon as the UK does in a year.

On the subject of conflict, one event excluded from calculating the carbon cost of the Ukraine war is the environmental impact of the NordStream pipeline attack. Nearly half a billion tonnes of methane was dumped into the atmosphere - 15 billion tonnes of carbon equivalent - 30 times the UK's annual carbon emissions. Long pipelines connecting us with Norway (whose north sea extraction is deemed OK) are vulnerable - and we know Russian ships have been exploring them.
Most credible forecasts have us requiring gas until at least 2050. We are behind targets on both EV adoption and heat pumps.

The ideology sounds appealingly simple - no drilling: no carbon- but like most ideologies, it turns a blind eye to facts that don't fit its narrative. The dogma has survived by incoherent arguments ("there's too little left to make a dent in the UK's needs, and yet so much that exploiting it would delay the transition to net zero") and hyperbole that collapses under the slightest scrutiny: ("it's a dwindling resource", "Norwegian north sea gas is more sustainable than ours", "we are showing climate leadership", etc). The drilling ban entirely ignores technical constraints, the intermittent nature of our available renewables, the lubrication required by wind turbines, the demand for plastic, etc. Some argue that all the above can be derived from plant sources but the reality of that is if land is growing fuel crops, it's not growing food, and with climate change, global crop yields are declining.

The carbon cost is cited as the reason new drilling has been banned but it is dwarfed by the environmental cost of not drilling.

J0110

As a Norwegian owned business operating in UK in the energy sector since many decades and having around 200 employees in sites in Scotland and England (Wick, Aberdeen, Chelmsford), we support fully the go ahead of Jackdaw project.

This would help future retention and new hires in all our sites, enhance the contribution to local economies, and ultimately not really changing the overall carbon footprint of UK.

J0111

Now that we have a new Prime Minister and a new Energy Secretary there is an opportunity for a wholesale reset on the previous administration's approach to UK Oil and Gas.

It has been accepted that Oil and Gas will be required for decades to come. Indeed it is often overlooked that oils and greases are used in huge quantities for wind turbines on which we will become increasingly reliant. A typical 15MW wind turbine uses over 1,000 litres of gearbox oil and up to 150kgs of grease with an annual replacement of approximately 500 litres of oil and 50 kg of grease. Oils are also vital for our manufacturing, food, textiles and transport industries.

We have the resources, expertise and workforce to deliver on the demands whilst at the same time creating very high value employment and skills. Under the current set-up we are losing jobs, expertise, skills and tax revenue to other countries by importing what we can produce domestically.

There is no genuine gain, other than a carbon accounting gain in which imported O&G counts as zero carbon, in importing. Indeed quite the reverse. Importing O&G has a higher carbon footprint and only adds to greenhouse gases compared to domestically produced O&G and their derivatives.

I would very much urge the UK to follow Norway and to fully expand drilling and exploration in UK waters in order to maximise the benefits to the UK and also to reduce the overall carbon footprint that occurs from importing.

J0112

I write to make a representation on the further information published in respect of the Jackdaw Field Development, reference D/4260/2021.

I object to the granting of consent.

I live in the Scottish Borders, in exactly the kind of upland landscape that has been burning across Scotland this summer. As I write, the Cairngorms have been alight for nine days and a "very high" wildfire warning covers southern Scotland. My objection is not abstract. It concerns the environment I live in and the environment this assessment is required to consider.

The Scottish Government's own Strategic Action Plan on Wildfires states that climate change is intensifying wildfire risk in Scotland through warmer temperatures and longer dry spells, and identifies peatland and woodland as particularly vulnerable — including through peat fires that smoulder underground and release stored carbon. 2025 was Scotland's most severe wildfire season on record, with 241 incidents, and the Carrbridge and Dava Moor fires were the largest ever recorded in the UK.

The combustion emissions assessed in the further information for this project are not a distant or theoretical harm. They contribute to precisely the conditions now damaging Scotland's landscapes, its biodiversity, its rural communities and its own carbon budgets costs borne here, while the resource is sold into global markets.

I ask that the Secretary of State give full weight to the scale of the assessed scope 3 emissions, and to the domestic climate harms already materialising, and refuse to agree to the grant of consent.

Yours faithfully,

J0113

I wish to submit a straightforward argument that the development of the Jackdaw gas field will not increase the United Kingdom's carbon emissions, and may bring about a reduction by replacing some imports of LNG (liquified natural gas).

My argument is as follows:

I have a fairly new gas boiler which I shall not replace for many years, unless the price of electricity should drop dramatically, which seems very unlikely. I shall therefore continue burning roughly the same amount of gas each year, irrespective of where it comes from. I suspect that the same is true of most domestic gas users, as well as the heavy users in the steel, chemicals, ceramics and glass industries.

We will not be increasing our carbon emissions as a result of the gas coming from the North Sea, rather than The Gulf or US fracking.

The nett climate impact of using gas from the Jackdaw field is therefore nil, or very likely a reduction because of the reduced amount of energy required during the processing and transport of gas from overseas.

Furthermore, replacing imports of gas with a domestic supply will benefit the UK's balance of payments, boost government tax revenues and secure jobs in our offshore industries.

A COMPREHENSIVE

CLIMATE ACTION PLAN

Limiting Global Warming to less than 2°C

A Plan for Global Justice, Equality & Prosperity

Within Planetary Boundaries

Drawn from my previous work, the work of Roger Hallam
and material from The Global Justice Report (World Inequality Lab, 2026)

By

Cllr. [redacted]

F.INST.S.M.M. GCGI M.INST.R

District Councillor, Ware Trinity • Parish Councillor, Stanstead St Margarets,
Engineer & Environmental Advocate

This document is dedicated to all those who have given their freedom, their comfort, and their time in defence of a liveable future.

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All views and opinions expressed in this document are entirely my own and do not represent those of any other person or organisation, including any with which I am affiliated. This document has not been approved or endorsed by any third party.

Readers should note that participating in non-violent direct action carries significant risks, including arrest, prosecution, criminal conviction, and imprisonment, and, in some countries, police brutality up to and including death.

Introduction: The Emergency We Face

The global Intensified Smallpox Eradication Programme began in 1967. The World Health Organization (WHO) officially declared the world free of smallpox in 1980.

The Montreal Protocol was signed in 1987.The ozone layer is now on a path to full recovery by 2066.

We are an intelligent species; we can and do come together to solve global problems.

I played a small walk on part in the Greenpeace Greenfreeze campaign and was rewarded with an invitation to the Greenpeace Christmas Party in 1993. I remember talking to one of the senior directors about climate concerns. “We’ll be OK as long as we have something in place by the Millenium”, was his conclusion. Based on previous successes, this was a perfectly logical position. Three years ahead of our deadline, the Kyoto Protocol was agreed in 1997. What could possibly go wrong?

Carbon dioxide levels continue to rise, and have now surpassed 430 parts per million for the first time in millions of years. But that is only half the story, methane levels are rising out of control, exceeding 1900 parts per billion, resulting in over 30% of human induced global warming.

The ice is melting, the floods get deeper, the fires reach higher, the winds get stronger, and our people are dying.

Because the Paris Agreement defines the 1.5°C limit as a long-term average, the carbon lobby, which should now be referred to as the death lobby, claims that the treaty has not legally failed. However, several major milestones have been breached:

- **First Daily Breaches (2023):** The global mean temperature first spiked past 1.5°C for several consecutive days in June 2023. By October 2023, the world had clocked a record number of individual days above the threshold.
- **First 12-Month Breach (February 2024):** The period from February 2023 to January 2024 marked the first time global temperatures averaged 1.52°C above pre-industrial levels for an entire consecutive year.
- **First Calendar Year Breach (2024):** 2024 was the first full calendar year to average over 1.5°C above pre-industrial levels.

Media coverage initially highlighted that "the future has arrived sooner than expected," linking the 1.5°C breach directly to visible global crises. Then a wave of lobbying reports emerged to “correct public perception”. When UN Secretary-General António Guterres stated that containing global warming below 1.5°C was no longer possible, the media narrative followed the carbon lobby lead and refused to detail the consequences.

Current reporting talks about the crime, but never mentions the criminal. The headlines say the disaster is "driven by the burning of fossil fuels", but without revealing who the driver is. Reports hide behind a passive voice and never name the criminals - the boardrooms that signed the orders, the politicians who took the donations, and the corporations that knowingly lit the fuse while counting their trillions in profit. Big Carbon is following Big Tobacco, killing their customers to maximise corporate profits. Corporate and social responsibility hasn’t worked; capitalism has failed us.

If further proof of the urgency and magnitude of the problem was needed, then look no further than the article in the Guardian, published on the 8th July 2026[1]:

“**UK has ‘no future’ if it fails to act on ecosystem collapse threatening national security**

MPs demand publication of full report that outlines catastrophic consequences amid concerns for food security

[1] https://www.theguardian.com/global-development/2026/jul/08/uk-report-ecosystem-collapse-national-threat-food-security?

Members of parliament have demanded full publication of an explosive report by the UK's spy leaders that found the collapse of ecosystems overseas would have catastrophic consequences for the UK's national security, warning that the UK has "no future" if the findings are not urgently acted on.

Despite growing concerns for the UK's food security, likely to be worsened by the third heatwave this summer currently afflicting the UK and swathes of the northern hemisphere, the government has refused to publish the full report, which has circulated among defence officials for more than a year.

The report paints a devastating picture of severe food shortages, price rises, migration, political destabilisation and possible war, resulting from the collapse of ecosystems, fuelled by the human-induced climate crisis and over-exploitation, as the Guardian has previously revealed. Food shortages could result within five years.

MPs on the environmental audit committee, who held a hearing on the report on Wednesday afternoon, also warned that the government was failing to "join the dots" between the national security threat posed by the climate crisis and the collapse of species, and swingeing cuts to the overseas aid and climate finance budgets.

[redacted] the minister for the Department of Environment Food and Rural Affairs, told MPs at the hearing that a redacted 14-page version of some findings, published after repeated freedom of information requests in January, should provide enough information. The Cabinet Office, also responsible for the cross-government report, refused to send a minister or official.

[redacted], the chair of the committee, said he was "disappointed" not to see the full version. "It's a disappointing signal, and it would be a positive sign if we could cooperate on a response to the findings," he said. "The minister clearly does appreciate the scale of this crisis. But I remain of the view that the government has more to do to grasp the urgency of the moment."

[redacted]f, the Labour MP, and a member of the committee, contrasted the £15bn to be added to the defence budget with the lack of funding to protect critical ecosystems. "The government can summon billions of pounds for new military hardware when the defence sector calls for it. We need an equally decisive mobilisation of investment to restore the natural world on which we rely for our food, water, and clean air. Without these essentials our country has no future," he said.

"Every critical ecosystem across our planet is on a pathway to collapse with an irreversible loss of function, and this poses huge threats to our national security. This looming crisis demands urgent action," he added, citing findings in the unpublished report. "[We need] recognition from every part of government about how important preventing global biodiversity collapse is for the future of our society."

[redacted], the Green party MP, said: "If the government is serious about security it makes no sense to be cutting the international development and climate finance budgets which are crucial to tackling these fundamental threats. It's outrageous for the government to refuse to let MPs see the full report. How can we possibly scrutinise whether the government's response to these grave risks is adequate?"

The report by the joint intelligence committee and other government departments, revealed by the Guardian last October, shows that the UK will face catastrophic consequences from the collapse of key ecosystems in other countries. These include the Amazon rainforest, which scientists fear is reaching a "tipping point" triggered by deforestation and rising temperatures, which would turn the ecosystem from a huge absorber of carbon dioxide into a net source of carbon.

Food shortages would be almost certain to result from the decline of ecosystems overseas, the report found, as would a big increase in global migration, with the potential to fuel unrest. Among the most alarming findings was that armed conflict, which includes nuclear war, was also a potential consequence.

The report was due to be published at an event last October, attended by King Charles, in the Natural History Museum. However, at the last minute the publication was pulled, at the behest of Downing Street.

Ministers at the Department of Environment, Food and Rural Affairs, and the Department for Energy Security and Net Zero, also tried to have the report released at the Cop30 summit in Brazil, but that was also prevented. Insiders said this was due to the former adviser to [redacted], [redacted].

The Guardian revealed in February that the UK's climate assistance to poor countries would be slashed, with a ringfence for nature spending scrapped, and projects from the Congo to Latin America and Asia losing out.

Which brings us to the Global Justice Report[2], setting out a path to keeping warming below 2C while doubling incomes for 89% of the world's population. It proposes wealth taxes on billionaires, a roughly 50% cut in average working hours, dietary change and a shift in investment toward education and healthcare. The report ends with a single sentence about "organised political struggle" and then just leaves it there — no link, no explanation, nothing about what that struggle actually looks like or how anyone might join it. My document aims to fill this gap.

[2] Chancel, L., Dietrich, J., Mohren, C., Moshrif, R.,Odersky, M., Piketty, T., Somanchi, A., et al. (2026), The Global Justice Report: A Plan for Equality & Prosperity Within Planetary Boundaries, World Inequality Lab (gjp.wid.world).

PART ONE

The Scientific Emergency

1. The Scientific Emergency

1.1 What the Science Actually Says

Atmospheric carbon dioxide has now reached 430 parts per million — more than 50% above the pre-industrial baseline of 280 ppm, and rising at 3.5 ppm per year, double the rate recorded in the 1980s. Global temperatures reached 1.6°C above pre-industrial levels in 2025, rising at 0.37°C per decade since 2010.

The IPCC's official central estimate of climate sensitivity — the warming produced by a doubling of atmospheric CO2 — is 3°C. James Hansen, the godfather of modern climate science, has published peer-reviewed analysis placing the figure at 4.5°C, a number consistent with accelerating recent temperature data that has outpaced standard model predictions. Hansen's figure represents the high end of peer-reviewed estimates, is consistent with recent observed data, and warrants treatment with the full seriousness the precautionary principle demands. Even at the IPCC's more conservative estimate, the trajectory is deeply alarming.

Global warming as of 2025:	**1.6°C above pre-industrial**
CO2 concentration (Mauna Loa, May 2025):	**430 ppm**
Rate of warming since 2010:	**0.37°C per decade**
Projected 2°C date:	**2030–2035 on current trajectory**
Carbon budget remaining for 2°C:	**4–5 years at current emission rates**
GJR target warming by 2100:	**1.8°C (under Global Justice Platform)**
GJR baseline warming by 2100:	**Over 4°C (under current policies)**

1.2 Feedback Loops and Tipping Points

The feedback loops now being triggered are almost exclusively amplifying: each one adds to the next, in ways that no single-variable model adequately captures.

- Arctic sea ice loss: as white ice melts, dark ocean absorbs heat previously reflected. A Blue Ocean Event — no summer Arctic Sea ice — is projected for 2030–2035 and will add approximately 0.2°C alone.
- Permafrost thaw: ancient methane and CO2 stores are released as permafrost melts. Methane is 80 times more potent than CO2 over 20 years. Atmospheric methane levels now exceed 1,920 ppb and are rising at over 11 ppb per year.
- Amazon dieback: the Amazon is shifting from carbon sink to carbon source as deforestation and drought intensify. The 2024 Canadian forest fires alone emitted as much carbon as the entire annual output of the United States.
- AMOC collapse: the Atlantic Meridional Overturning Circulation is weakening, threatening a tipping point within the next 10–20 years. For the UK and Ireland, this means sharply colder winters, collapsed grass-based agriculture, and potentially months of semi-frozen conditions each year.
- Cloud cover reduction: as temperatures rise, cloud cover falls, exposing more of the Earth's surface to direct solar radiation and further accelerating warming.

- Carbon sink weakening: land and ocean carbon sinks have already lost 20% of their absorptive capacity in the last decade.

Under the Global Justice Report's 'Persistent Inequality' baseline scenario — which models current policies — cumulative GHG emissions reach approximately 5,000 gigatonnes by 2100, driving warming above 4°C. Under the 'Sustainable Convergence' scenario combining sufficiency and fast decarbonisation, cumulative emissions fall to approximately 700 gigatonnes, limiting warming to 1.8°C.

1.3 The Human Consequences

The British insurance industry — whose actuaries depend on accurate risk assessment — projects two billion deaths at 2°C and four billion at 3°C. These figures were admitted as agreed fact in a British court in 2024; the jury returned a not-guilty verdict for climate activists in under an hour[3]. At 2.7°C, the Wet Bulb Effect makes significant portions of South America, Africa and South-East Asia literally uninhabitable without air conditioning, affecting around four billion people. One billion refugees is the projected consequence of 2°C — twenty times the total number of refugees at the end of the Second World War.

The Global Justice Report frames these risks in economic as well as human terms. Under the baseline trajectory, the cost of climate damage to the global economy dwarfs the cost of the transition needed to prevent it. The report's authors calculate that the North-South transfers required by the Global Justice Fund — approximately 0.8% of world GDP per year — are significantly smaller than the annual damages the US and Europe are currently imposing on the rest of the world through historical and ongoing emissions: approximately 3.2% of world GDP per year.

1.4 The Language of the Crisis

One of the most important contributions this plan can make is insisting on honest language. Liberal media and liberal politics have developed a sophisticated grammar for not saying what they mean. The question marks where full stops belong. The diplomatic softening that turns mass death into 'risk', civilisational collapse into 'concern', and the murder of billions by continuing inaction into 'complicated dynamics'.

The Paris Agreement's 1.5°C target has already been breached. The 2°C target will be breached within a decade on current trajectories. The carbon budget for staying below 2°C has approximately four to five years left. Saying these things plainly is not alarmism. It is the minimum requirement of intellectual honesty in a genuine emergency. Those who refuse to say them — including many who consider themselves climate advocates — are actively maintaining the fiction that there is still time for the existing system to respond gradually. There is not.

The Global Justice Report is deliberately explicit about the scale of what is required: 10.3% of world GDP per year in the Global Justice Fund, compared with the 0.4% currently allocated to development aid and international organisations. A 90% top income tax rate. A 20% annual wealth tax on billionaires. A one-person-one-vote transition at the IMF. These are radical proposals. But they are proposals that follow logically from the science and the mathematics, stated plainly.

> ***"Only through the combination of sufficiency and an energy transition can humanity stay below 2°C. Otherwise, the world is heading for a climate catastrophe, with global warming above 4°C by 2100."***

[3] https://ukhealthalliance.org/news-item/jury-returns-unanimous-not-guilty-verdict-in-case-against-climate-protesting-medics-on-trial-for-cracking-windows-at-jp-morgan-bank/

PART TWO

A Plan to Limit Warming to 2°C

2. A Plan to Limit Warming to 2°C

The Global Justice Report is the first attempt to propose a fully quantified plan for limiting global warming to below 2°C while simultaneously achieving equality and prosperity for all of humanity. It is the scientific foundation of this section.

2.1 The Three Pillars of the Global Justice Plan

The report's central finding is that limiting warming to 2°C requires three things simultaneously — no one of which is sufficient on its own:

- Fast decarbonisation of energy systems: fossil fuels must fall from roughly 50% of global energy demand today to under 20% by 2050 and to zero before the end of the century. Electricity must account for nearly 80% of total energy demand by mid-century, generated entirely from low-carbon sources. This requires massive infrastructure investment: 3–4% of world GDP annually for the next three decades.
- Sufficiency: a structural transformation of the economy involving shorter working hours (from 2,100 to 1,000 hours per year by 2100), a shift from material to immaterial sectors (especially education and health, rising from 11% to 43% of global working hours), major changes in food habits, a strict ban on deforestation, and a gradual return of global forest cover to 1900 levels.
- Compression of inequality: both between countries (closing the 16-fold gap in average monthly incomes, from €290 in Sub-Saharan Africa to €4,590 in North America, converging to €5,000 everywhere by 2100) and within countries (income scale compressed to 1:5, wealth scale to 1:10). This compression is both a social justice objective and the financial precondition for funding the first two pillars.

The report demonstrates, through detailed quantitative modelling, that targeted sufficiency is more effective than broad degrowth. A global convergence to €60,000 per capita GDP with structural sectoral change produces 1.8°C warming by 2100 — better than the 1.9°C associated with uniform degrowth to €15,000 but without structural change. Destroying prosperity is not necessary. Transforming what prosperity consists of is.

2.2 Pillar 1 — Fast Decarbonisation of Energy Systems

The energy transition required is unprecedented in speed but not in scale — the world has achieved comparable infrastructure transformations in the past, from electrification to motorisation. What is required is the political will to treat it as the emergency it is.

- Fossil fuels: from 50% of global energy demand today to under 20% by 2050 and zero by 2100.
- Electricity: from roughly 25% of energy demand today to 80% by mid-century, all from low-carbon sources.
- Existing fossil fuel assets: the International Energy Agency calculates that no new oil, gas or coal fields should be approved for development under a 2°C scenario. All planned extraction from existing licences that exceeds the carbon budget must be treated as a stranded asset. The Global Justice Report confirms this: the Hertfordshire County Council pension fund's investment of over 2% of its assets in fossil fuel companies including Shell, EOG Resources

and BHP Billiton represents exposure to assets that will lose most of their value as the energy transition accelerates.

- Electrification: of heating (heat pumps replacing gas boilers), transport (electric vehicles and public transport), and industrial processes. The UK's statutory 2035 net-zero target requires this transition to happen faster than current policy delivers.
- Public investment: the market alone will not deliver a transition at this speed. Public ownership of strategic energy infrastructure — through vehicles like Great British Energy, established by the Starmer government with £8.3 billion initial capitalisation — is not optional but necessary.

The Global Justice Report calculates that climate investment alone requires 3–4% of world GDP annually for the next three decades. For a country with the UK's GDP of approximately $3.1 trillion, that translates to £70–100 billion per year in climate investment — compared with current climate spending of approximately £20 billion per year.

2.3 Pillar 2 — Sufficiency: Transforming Consumption and Land Use

Sufficiency does not mean poverty. The Global Justice Report's modelling shows that nearly 90% of the world's population can double their income under the Global Justice Platform, while working roughly half as many hours as today. What changes is what the economy produces and what people consume.

- Working hours: falling from an average of 2,100 hours per year today to 1,000 hours by 2100 — continuing and accelerating a trend that has characterised economic development since the Industrial Revolution, and requiring similarly strong collective mobilisation.
- Sectoral shift: from material to immaterial sectors. The share of global working hours devoted to education and health rises from 11% today to 43% in 2100 — Norway and Sweden already allocate 30–35% to these sectors.
- Food systems: a substantial shift in food habits, reducing the land area devoted to animal agriculture, allowing reforestation and a return of global forest cover to 1900 levels.
- Deforestation: a strict ban, immediately, globally.
- Gender equality: full convergence of men and women on equal amounts of economic and domestic labour and equal average pay, requiring systematic policy change including equal parental leave, anti-discrimination enforcement and gender quotas.

2.4 Pillar 3 — Compressing Inequality

The Global Justice Report makes a case that this plan treats as its most important political insight: that the compression of inequality is not merely a social justice objective but a necessary precondition for making the other two pillars work. Countries that experienced the greatest reduction in top-end inequality in the twentieth century — Nordic and Western Europe — were also those that experienced some of the most impressive productivity gains. The United States, where top inequality rose markedly after the 1980s, did not enjoy faster productivity growth than Western and Nordic Europe over the same period.

Inequality compression means:

- Within countries: income scales compressed to 1:5 (the ratio between the 99th percentile and the 10th percentile income) and wealth scales to 1:10. This is comparable to the reduction achieved in Western and Nordic Europe over the twentieth century and is consistent with those countries' strongest periods of economic growth.
- Between countries: per capita monthly gross national income rising from €290 in Sub-Saharan Africa to convergence at €5,000 in all countries by 2100.
- The billionaire class: the top 0.001% wealth share (the billionaire class) falls from 6.4% to 0.05% of world wealth — a decline of more than a hundredfold.

2.5 The Temperature Pathway to 1.8°C by 2100

Under the Global Justice Platform's Sustainable Convergence scenario, combining fast decarbonisation with sufficiency and inequality compression:

- Cumulative GHG emissions fall from the baseline 5,000+ gigatonnes to approximately 700 gigatonnes by 2100
- Temperature rise is limited to 1.8°C by 2100, compared with over 4°C under current policies
- Fossil fuels fall to under 20% of energy demand by 2050 and zero by 2100
- 80% of electricity is generated from low-carbon sources by mid-century
- Global forest cover returns to 1900 levels
- Annual labour hours fall from 2,100 to 1,000 — less work, more leisure, lower material footprint

> ***"Warming reaches 1.8°C under sustainable convergence and fast decarbonisation, against over 4°C under persistent inequality and slow decarbonisation. The choice between them is a political choice, not a technical constraint."***

PART THREE

How to Pay for It

3. How to Pay for It — The Global Justice Fund

The single most common objection to ambitious climate action is: who pays? The Global Justice Report provides the most detailed answer ever published. This section summarises that answer.

3.1 The Scale of the Challenge

Climate investment alone requires 3–4% of world GDP per year for the next three decades. But climate investment on its own is insufficient: it must be accompanied by a major push in education and health spending to foster the global convergence that makes the sufficiency transition politically sustainable. The Global Justice Fund is designed to do both simultaneously.

Annual expenditures of the Global Justice Fund average 10.3% of world GDP over 2026–2060. This is an order of magnitude larger than anything currently committed to development or climate finance. Current official development aid amounts to 0.3% of world GDP. The combined annual budgets of the UN, IMF and World Bank account for 0.1% of world GDP. The GJF is not an incremental improvement on these institutions. It is a qualitatively different response to a qualitatively different challenge.

The report notes that this scale of public expenditure is not without historical precedent: the Marshall Plan, which rebuilt Western Europe after the Second World War, cost roughly 2% of US GDP per year for four years. The scale of the climate challenge requires a sustained Marshall Plan many times that size — but one that, unlike the original, benefits all regions of the world rather than primarily the already-rich.

3.2 The Global Wealth Tax

The primary funding mechanism in the early phase of the Global Justice Fund is a progressive global wealth tax, targeting the top 1% of the world's wealth distribution — approximately 80 million people with average per capita wealth above around €500,000.

The proposed rates are:

- 0% below 10 times the world average wealth (approximately €400,000 in 2026)
- A modest annual levy between 10 and 100 times average wealth
- Rising rates for centimillionaires (wealth above €50 million)
- 20% per year on billionaires

At 20% per year, the global wealth tax on billionaires is not a trivial measure. It would, if sustained, eliminate billionaire-scale fortunes within a generation — which is exactly the point. The report calculates that the billionaire class currently holds 6.4% of total world wealth. Under the Global Justice Platform, that share falls to 0.05% by 2100.

The report addresses the obvious objection — won't the rich simply move? — by noting that the tax is global and uniform, applying identical rates to all billionaires regardless of nationality or residence. Capital flight from one country is useless if the same rate applies everywhere. The practical enforcement mechanism relies on automatic exchange of financial information between countries (already substantially in place through the OECD's Common Reporting Standard) and on the Clearing Union mechanism discussed in Section 3.6.

3.3 The Global Income Tax

Complementing the wealth tax, a global progressive income tax rises to 90% at the very top of the income distribution — consistent with the rates that prevailed in the United States from 1944 to 1963, a period of exceptional economic growth, and in the UK until 1979. The rate structure mirrors the income compression target:

- 0% on incomes below the world average
- Rising progressively above the world average
- 90% on incomes in the top percentile of global incomes

Together, the wealth and income taxes target approximately 1% of the world's population. They come in addition to national tax systems: they are a floor on progressive taxation, not a ceiling. Countries may levy higher rates nationally if they choose.

3.4 The World Sovereign Fund

Revenue raised by the global wealth and income taxes is reinvested through the World Sovereign Fund (WSF), an active portfolio of sustainable assets that accumulates to approximately 60% of world GDP (roughly 10% of the world capital stock) by 2040 and stabilises at that level. Once built up, investment income from the WSF replaces tax revenue as the platform's primary source of financing: by 2050, investment returns already represent three-quarters of GJF resources; by 2100, they represent all of them.

The WSF serves two purposes: it generates the ongoing revenue needed to fund country dividends and climate investment, and it provides a permanent public stake of 10% of the world capital stock, contributing to the reorientation of global investment toward sustainable development rather than extractive fossil fuel industries.

3.5 Country Dividends

The GJF distributes its resources through country dividends — per-capita payments made equally to every country in the world, to be used for climate investment, education and health. Because dividends are per-capita rather than per-GDP, they represent a larger share of income in poor countries than in rich ones: approximately 2–3% of GDP in Europe and North America over 2026–2100, against 5% in South & South-East Asia and 9% in Sub-Saharan Africa.

Country dividends come with conditions: countries must meet climate targets (verifiable GHG emissions, a halt to deforestation, low-carbon energy investment), human capital targets (education and health expenditure) and inequality targets (distribution of income and wealth within the country). This conditionality is not punitive — it is the mechanism that ensures resources are used for their intended purpose and that the global transition is genuinely universal.

3.6 Reforming the International Monetary Order

The Global Justice Fund operates within a broader transformation of the international economic and monetary system, which the report describes as a necessary condition for its sustainability.

- An International Clearing Union (ICU): replacing the dollar-dominated system that gives the United States and other rich countries 'exorbitant privilege' — the ability to earn higher returns on their foreign assets than they pay on their foreign liabilities, effectively receiving a financial transfer from poor countries of 0.6–0.8% of world GDP per year. An ICU would issue a new international reserve currency and balance trade surpluses against deficits, eliminating the structural advantage that rich countries currently enjoy.
- A UN Central Bank: transforming the IMF into a genuinely democratic institution that issues international reserve currency and provides emergency liquidity to all countries on equal terms.

- One person, one vote: a transition from the current GDP-weighted voting system at the IMF and World Bank — under which Europe and North America hold four times their population share of votes, while South & South-East Asia and Sub-Saharan Africa hold a quarter — to a per-capita allocation.

3.7 Who Benefits — and Who Pays

The report's analysis of winners and losers is unusually detailed and unusually honest. About 89% of the world's population sees their annual monetary income more than double between 2025 and 2100. Less than 2% experience an income decline. In the Global South, gains are nearly universal: about 99% of the population sees more than 100% growth in monetary income.

In rich countries, the picture is more nuanced. About 45% of the population in North America/Oceania and 28% in Europe at least doubles monetary income. A minority (14% in North America/Oceania, 6% in Europe) sees monetary income decline. Those who lose out are almost exclusively at the very top of each country's income distribution — the ultra-rich, whose losses are the direct product of the wealth and income tax.

When the value of additional leisure time and the avoided costs of climate damage are included in the calculation, more than 99% of the world's population is better off in 2100 than today, including in the richest countries. The opposition to the Global Justice Platform comes not from material self-interest but from ideological commitment to the existing order — which is why the political battle, as the report acknowledges, is fundamentally a battle of ideas.

> ***"Large majorities benefit from the Global Justice Platform in every region of the world. The opposition it faces will be fierce — but it will come from the ultra-rich, not from the bottom or middle of the income distribution."***

PART FOUR

The Political Failure and How to Overcome It

4. The Political Failure and How to Overcome It

4.1 Why the Political Class Has Failed

The obvious question is: if the solution is technically available and benefits 89% of the world's population, why has it not been implemented? The answer requires a frank analysis of political failure.

The political class in every major economy is not, primarily, composed of people who bear responsibility for the future. It is composed of people whose careers, relationships and worldviews are structured by the existing economic order. The fossil fuel industry, the financial sector that funds it, the media conglomerates owned by people who benefit from it, and the political parties that depend on their donations — all have a structural interest in the continuation of an economic model that the science says will kill billions.

This is not a conspiracy theory. It is a description of how incentive systems work. Thomas Hobbes' political theory provides the framework: the state exists to protect the public from chaos. But when those who control the state knowingly continue to enable the emissions that will kill billions — in full knowledge of what the science says — they have forfeited the Hobbesian justification for their authority. The correct description is not 'policy failure' or 'insufficient ambition'. It is, as [redacted] has argued, treason. Others might prefer the words "ecocide" or "state sponsored autogenocide".

4.2 The Controlled Opposition and the Liberal Lie

Those who refuse to name the state of exception are not neutral. They actively maintain the system that is producing it. The liberal media, the NGOs that depend on foundation funding, the parliamentary parties that treat climate as one issue among many — all perform what might be called managed outrage: acknowledging the crisis whilst refusing to acknowledge its consequences.

The language of crisis management — 'fears COP could disappoint', 'negotiations risk failing', 'complicated dynamics' — turns the largest crime in human history into a policy problem. It turns the knowingly enabled deaths of billions into a set of subjective impressions. And it maintains the fiction that there is still time for gradual measures. There is not. The carbon budget for 2°C has four to five years left at current emission rates. The honest sentence is the one that says this plainly.

4.3 The Collapse of the Centre and the Populist Threat

The 2024 general election delivered Labour a landslide majority on 33.7% of the vote — the most disproportionate majority in modern British political history — while Reform UK, running on climate denial and cultural grievance, took 14.3% of the vote. In the 2025 local elections, Reform won more than 600 council seats and control of multiple county councils. This is the same structural dynamic that my 2020 document[4] identified — vote-splitting amongst parties that broadly agree,

[4] A Draft Manifesto for a Green Socialist and Liberal Cooperative V.3 31/07/2020

handing power to a party most voters oppose — but with Reform UK now occupying the role the Conservatives occupied in 2019.

The Global Justice Report provides the economic explanation for the populist surge. In the countries where the GJP's monetary losers are concentrated — the 14% of North America/Oceania's population whose monetary income would decline under the GJP — a significant fraction is not the ultra-rich but the upper-middle class: people who are above-average earners but not in the top 1%, who feel economically squeezed by the inadequacies of the existing system and who are, for understandable reasons, susceptible to movements that offer cultural explanations for material anxiety. Building a majority for the Global Justice Platform requires taking this anxiety seriously rather than dismissing it as mere prejudice.

4.4 What Real Democracy Looks Like

Democracy means rule by the people. Not rule for the people. Not rule by those who claim to know what the people need. The people themselves rule. This is not a radical claim. It is what the word means. And the existing electoral systems of wealthy democracies do not, on the most honest analysis, produce it.

Roughly 5% of elected representatives in Western democracies are working-class. Working-class people constitute roughly 50% of the population. This is not imperfect democracy striving towards the ideal. It is oligarchy sold as democracy. The American founding fathers designed the electoral system explicitly to prevent democracy; the British constitutional settlement, for all its incremental reform, has never fully escaped the same structural bias toward the propertied. The Global Justice Report's demand for one-person-one-vote in international institutions is the same demand, applied globally.

4.5 Sortition and Citizens' Assemblies

The democratic alternative to party oligarchy is sortition: the random selection of citizens to hold power, for fixed terms, in constituted deliberative bodies with real decision-making authority. This is not a new idea. It was the foundation of Athenian democracy. It is how jury systems work in every common law country. And it is how Ireland's citizens' assembly on abortion produced a constitutional change that no elected parliament would have initiated — with strong public support once it had been decided.

Citizens' assemblies selected by sortition consistently produce better policy outcomes than partisan chambers, for straightforward reasons: participants are not performing for voters or party whips; they are not defending institutional positions; they are not dependent on campaign donations. When given real information and real power, ordinary people converge on pragmatic, pro-social solutions at a rate that puts professional politicians to shame.

The Global Justice Report calls for all decisions about the Global Justice Fund to be made under a double-majority rule — 55% of countries representing 60% of the world's population. This is sortition logic applied internationally: genuine democratic legitimacy requires that decisions reflect the population they affect, not the financial power of those who currently dominate the institutions.

> ***"The shift from global plutocracy to global democracy has the same status as the shift from national plutocracy to national democracy that occurred in the twentieth century. It is both a goal and a means."***

PART FIVE

The Strategy

5. The Strategy — Cooperation, Organisation and Action

5.1 Progressive Electoral Cooperation

The structural problem of progressive vote-splitting is well understood and has been documented across multiple elections in East Hertfordshire and nationally. In 2017, the combined vote share of Green, Labour and Liberal Democrat candidates in Bishops Stortford East and Hertford St Andrews was large enough to have won both seats against the Conservatives had the three parties agreed not to split the vote. They did not agree. The Conservatives won both.

By 2023, the pattern had begun to change. East Herts Greens' joint administration with the Liberal Democrats has put the Conservatives into opposition at district level. The same logic applies at Westminster: the next general election (due no later than 15 August 2029) offers an opportunity to build on this model and to demonstrate nationally what local cooperation has already shown locally.

The conditions for cooperation are political, not technical. They require all parties involved to subordinate their institutional interest to the shared interest in preventing the populist right from filling the vacuum created by vote-splitting. This is harder than it sounds. It requires the Green Party to stand aside in some seats where it might, on historical trends, finish second rather than first. It requires Labour to accept Green and Liberal Democrat candidates in seats where their own candidate came third. And it requires all three parties to trust each other enough to keep the agreement when local pressures become acute. This plan calls for that process to begin immediately, not six weeks before the election.

5.2 How Movements Actually Win

Electoral cooperation alone is insufficient. It must be accompanied by the patient, unglamorous work of community organising: the doorstep conversation, the small group assembly, the WhatsApp group, the petition, the public meeting, the open hustings. The evidence from East Hertfordshire's own experience — from a single Parish Council seat in 2018 to the largest party on East Herts District Council in 2023 — confirms what movement research has documented globally: that change comes from the accumulation of relationships, not from the accumulation of arguments.

[redacted] research on meeting design found that meetings built around small group discussion — in which every participant speaks and is heard — produce 80% empowerment rates and near-total return rates. Meetings built around consecutive speakers produce 20% empowerment and near-zero return rates. The difference is structural, not ideological: the difference between being treated as a subject with agency and being treated as a passive recipient of information. Any organisation that wants to grow must build accordingly.

The Global Justice Report's own political strategy section reaches the same conclusion. It argues that building a coalition for the Global Justice Platform requires, above all, grassroots organising and the creation of what it calls a Global Citizen Movement for Social Justice — one that combines the energy of social movements with the electoral focus needed to translate mobilisation into power.

Social change does not happen gradually. It happens in non-linear jumps. Syriza went from 4% to 40% during the Greek crisis in under a year. Extinction Rebellion went from a planning meeting of fifteen people in Stroud to shutting down London's bridges in twelve months. The question is not how to guarantee the jump — it cannot be guaranteed — but how to create the conditions that make it possible when the ruptures come. Those conditions are built in the evenings and on the doorsteps, in the ordinary work of human connection, before they are visible in the headlines.

5.3 The Role of Civil Society and NGOs

Environmental NGOs, trade unions, faith communities, professional associations and civil resistance movements all have essential roles in the coalition this plan calls for. But they are not currently working together at the scale or speed the emergency demands.

Extinction Rebellion's most lasting contribution has arguably been cultural: it gave a generation of people direct experience of the bridges, the arrests and the courtrooms, producing councillors, candidates and organisers who brought that energy and drive into electoral politics. Just Stop Oil's campaign of disruptive direct action between 2022 and 2024 triggered some of the most severe sentences for non-violent protest in modern British history — confirming, if confirmation were needed, that disruptive protest still has the capacity to alarm power in a way that polite lobbying does not.

But the relationship between disruptive protest and electoral politics is not one of straightforward conversion: people arrested for blocking roads do not automatically become vote-winners. The movement needs both: the civil resistance that changes what is politically thinkable, and the electoral organisation that converts changed thinking into changed policy. The challenge is building structures that enable the two to reinforce rather than undermine each other.

The Global Justice Report's conclusion calls explicitly for a Global Citizen Movement combining citizens' assemblies, civil resistance and electoral organisation. It notes that 'in some cases, crises, wars, and catastrophes of all sorts also played a crucial role in accelerating political change' — referencing [redacted] Ministry of the Future, which imagines a world where major climate catastrophes finally force the transformation of political and economic systems. The real-world equivalent — the Valencia floods of 2024, which killed 200 people and brought 100,000 onto the streets within a week — suggests this dynamic is already beginning.

5.4 The Role of Climate Ambassadors

One of the most critical gaps in the existing climate movement is coordination. Political parties, trade unions, NGOs, faith communities and professional bodies are all doing valuable work, but they are doing so largely in parallel rather than in concert. They have different meetings, use different language, operate on different timescales, and often have institutional incentives to protect their own terrain rather than to share it.

What the movement needs, urgently, is a network of individuals with the credibility, the relationships, and the communication skills to bridge these organisational silos — people who can speak the language of electoral politics and the language of civil resistance; who understand the science and can translate it for a general audience; who have standing in professional, civic and political communities; and who are committed to coordination rather than to any particular organisation's agenda.

These individuals — climate ambassadors, in the broadest sense — are not lobbyists, not party representatives, and not NGO employees. They are trusted connectors who can convene the conversations that organisational boundaries prevent, build the relationships that make cooperation possible, and maintain the strategic focus on outcomes rather than on institutional positioning. They operate at local, regional, national and international levels, and their value is precisely their independence: they serve the goal, not the organisation.

Climate ambassadors need to be fluent in the key dimensions of the challenge: the science, including the quantitative findings of the Global Justice Report; the political strategy, including the

case for progressive electoral cooperation and sortition-based democracy; the economic framework, including the Global Justice Fund mechanism; and the moral case, which must be made not only in the language of risk and cost-benefit but in the language of justice, solidarity and love. They are, ultimately, advocates for a different way of seeing the world — one in which the interests of the most vulnerable, including those not yet born, are treated as real rather than theoretical.

The development of this ambassador network is a priority for the near term future. It requires investment in training, in coordination infrastructure, and in the patient work of building the trust that makes genuine collaboration possible. It also requires, eventually, institutional homes: universities, civic organisations, international bodies, and political parties that understand the value of independent coordination and are willing to resource it.

5.5 Case Studies in Successful Resistance

History offers consistent evidence that the approach described in this plan — combining electoral cooperation, grassroots organising, civil resistance and the patient building of coalitions across organisational boundaries — works.

[redacted] and [redacted] analysis of 323 cases of civil resistance since 1917 found that nonviolent campaigns were approximately twice as likely to succeed as violent ones. The single most important factor in success was participation: campaigns that reached 3.5% of the national population in sustained active participation had never failed. For the UK, that threshold is 2.3 million people. Extinction Rebellion, at its peak in 2019, mobilised approximately 100,000 people in sustained action. The gap between 100,000 and 2.3 million is not a gap in technology or in communication. It is a gap in organised, coordinated relationships.

The East Hertfordshire case demonstrates that the gap can be closed, ward by ward. From a single Parish Council seat in 2018 to the largest party on East Herts District Council in 2023 — and four county council seats in 2025 — the progression has followed the model this plan recommends: investment in doorstep organising, open hustings, and a consistent emphasis on the specific, local implications of the climate emergency. The lesson is not that this is easy. It is that it works when it is done properly.

5.6 The Road to 2029

The next UK general election must be held no later than 15 August 2029. This document is being written in 2026. That leaves approximately three years to build the electoral cooperation, the community organising, the network of coordinating individuals, and the public understanding of the Global Justice Plan that will be needed to make 2029 different from 2024.

The specific priorities for that period are:

- A bilateral cooperation agreement between the progressive political parties.
- Building on previous successes to establish progressive-led services that demonstrate the difference active governance makes — on housing, energy, environment and community wealth.
- Developing the ambassador network described in Section 5.4, beginning locally and expanding to regional national and international levels.
- Engaging with the Global Justice Report's recommendations at UK national level, pressing the government to go further and faster on wealth taxation, fossil fuel licensing and international climate finance.
- Maintaining and expanding the relationship with civil resistance organisations, in order to keep the pressure on the political class that electoral politics alone cannot generate.

> ***"The future is populist democratic socialism or varieties of fascist barbarism. This is not ideology. It is physics and money."***

PART SIX

The Programme — From Local to Global

6. The Programme — From Local to Global

6.1 Zero Real Emissions by 2035

Not net-zero with offsets and accounting tricks. Zero real emissions by 2035. Every year of delay locks in additional warming, additional tipping point activation, additional deaths. The carbon budget for 2°C has approximately four to five years left at current emission rates. Emissions are still rising.

This requires: the immediate end of new oil and gas extraction and licensing in the UK; rapid electrification of heating, transport and industry funded by public money; a wartime mobilisation of industrial capacity and workforce training; and wealth redistribution sufficient to fund this transition without imposing its costs on those least responsible for the crisis. It requires the UK government to go beyond its statutory 2035 net-zero target and remove the loopholes — offset trading, carbon credits, international aviation and shipping exclusions — that allow the headline figure to obscure a continuing failure to cut actual emissions.

6.2 Housing, Energy and the Net-Zero Home

The UK has approximately 29 million homes. The vast majority are heated by gas, which must be phased out. The transition to heat pumps, solar photovoltaics and energy storage is technically straightforward — these are mature, commercially available technologies — but requires capital that most households do not have and that the private market, left to itself, will not deploy at the required speed.

The Home Upgrade Grant, the Boiler Upgrade Scheme, and GB Energy's Local Power Plan all represent partial steps in the right direction. None is remotely adequate to the scale of the challenge. What is needed is a publicly funded, council-led programme of net-zero home upgrades — heat pumps, solar PV, triple glazing, insulation — beginning with social housing and extending to owner-occupied homes through a combination of grants, green mortgages, and the abolition of the planning barriers that currently prevent retrofits in conservation areas.

Local councils should use every power available to it to pilot this programme: applying to GB Energy's Local Power Plan, establishing a municipal energy company on the Bristol model, and using planning powers to require new developments to be built to the highest energy efficiency standards rather than the minimum permitted.

6.3 Community Wealth Building: The Preston Model

The community wealth building strategy pioneered by Preston City Council from 2013 onwards offers a model that other councils can act on directly. By redirecting procurement spend from anchor institutions — councils, universities, hospitals, housing associations — toward local and cooperative businesses, Preston raised its local procurement share from approximately 5% to nearly 30% within five years, with measurable improvements in local economic resilience and prosperity.

Councils should map the procurement spend of every anchor institution operating within their area and set a binding target for the proportion retained in the local economy, with a particular preference for cooperative and employee-owned enterprises and businesses meeting credible environmental standards. The Centre for Local Economic Strategies (CLES) provides a detailed implementation guide; several other councils have already demonstrated that this is achievable within existing legal and financial frameworks.

6.4 Public Power: GB Energy and Municipal Renewables

Great British Energy, established by the Starmer government with an initial capitalisation of £8.3 billion, includes a Local Power Plan intended to support community-owned and council-owned renewable energy projects, with up to £500 million earmarked for partnerships with local authorities. Councils should develop a bid to GB Energy's Local Power Plan for a municipally owned solar and battery storage scheme on council-owned land and rooftops. This would generate revenue for the council that could be reinvested in social housing and community services, reduce the council's own energy cost exposure, and provide a visible demonstration that public ownership of energy infrastructure is not a slogan but a working model.

6.5 Democratic Control of the Economy

The climate crisis is inseparable from the economic system that produced it. Concentrated capital, freed from democratic accountability by decades of neoliberal policy, has produced the conditions for catastrophe. The solution proposed by this plan — consistent with the Global Justice Report's framework — is not the wholesale nationalisation of specific companies but the democratic reorientation of economic life: cooperative ownership, community control, citizens' assemblies setting investment priorities, and the subordination of economic activity to human flourishing and ecological sustainability. At national level, this means: a genuine windfall tax on fossil fuel profits; the removal of the billions in annual subsidies to the fossil fuel industry; the abolition of non-dom tax status; and the introduction of an annual wealth tax on assets over £10 million, consistent with the Global Justice Report's international framework. At international level, it means championing the Global Justice Fund in multilateral negotiations, supporting the UN Tax Convention process, and building the political coalition that the report identifies as the prerequisite for a functioning global climate finance system.

6.6 Social Justice and International Solidarity

The Global Justice Report's most politically important finding is that the compression of global inequality is not a cost of climate action. It is a precondition for it. Countries in the Global South have legitimate aspirations to economic development. Any credible framework for global climate cooperation must account for those aspirations. The Global Justice Platform does: per capita monthly income converging to €5,000 everywhere by 2100, financed by the Global Justice Fund's country dividends.

The North-South transfers implied by the GJP — approximately 0.8% of world GDP per year — are significantly smaller than the annual compensation that, by the report's calculation, Europe and North America should have paid over the period 2026–2100 for the cumulative colonial and climate damages they imposed between 1800 and 2025: approximately 3.2% of world GDP per year. The GJP is not charity. It is partial reparation — a downpayment on a debt that is far larger.

This plan supports the Bridgetown Initiative launched by Barbados in 2022, which proposes combining international monetary reform, global wealth taxation and climate finance in exactly the terms the Global Justice Report formalises. It supports the UN Tax Convention process. It supports the G20 initiatives led by Brazil and South Africa on global inequality. And it calls on the UK government to champion these frameworks in every international forum rather than treating them as peripheral to its foreign policy.

PART SEVEN

The Inner Life of a Movement

7. The Inner Life of a Movement

A plan for transforming the global economy is also, necessarily, a plan for transforming the people who will carry it out. This section draws on philosophical and personal reflections because a movement that does not attend to its own psychology will not survive long enough to deliver the change it seeks.

7.1 Suffering, Resilience and the Transcendent Self

Post-traumatic growth — the phenomenon in which adversity produces not only damage but genuine growth — is one of the most robustly documented findings in modern psychology. Studies of Vietnam veterans found that 75% reported positive growth a decade after their experience. The civil rights marchers who crossed the Edmund Pettus Bridge, the anti-apartheid activists who spent years in Robben Island, the trade unionists who endured the 1984–85 miners' strike — all found, in the experience of shared adversity, something that their ordinary lives had not offered: a community of meaning, a clarity of purpose, and a quality of presence that comfortable times rarely produce.

This does not mean that suffering is good, or that we should seek it out. It means that the fear of suffering — the fear of arrest, of reputational damage, of losing income — is, for most people, larger than the suffering itself. And it means that a movement that helps its members encounter and transcend that fear will be stronger, more resilient and more effective than one that avoids it.

The philosophical tradition that speaks most clearly to this is the contemplative one, which exists in every major religion and which modern psychology has increasingly validated: the distinction between the self that is buffeted by events and the observing self that watches without being consumed. Resilience does not come from not feeling vulnerable. It comes from feeling vulnerability and continuing anyway. Hallam's description of this — written from a prison cell in Norfolk, serving a sentence for the non-violent act of organising a Zoom call about civil disobedience — is worth quoting at length: 'Everything can be taken from you except your being. Start there. Then act.'

7.2 Love as a Political Category

If there is a single concept that unifies the political, strategic and personal dimensions of this plan, it is love — understood not as a sentiment but as a practice. In the classical sense, love is the act of enhancing the well-being of the other. It is attention, recognition, the willingness to be present to another person's reality without filtering it through your own needs.

Its political implications are radical. If the foundational human need is not power but love — not domination but recognition — then the entire edifice of power politics rests on a misunderstanding. People pursue power not because it is ultimately what they want, but because they have been taught it is the route to what they actually need: to be seen, to matter, to belong. The listening politics of small-group assemblies, the door-knocking conversation that asks rather than tells, the open hustings that treats voters as subjects rather than objects — these are not just tactics. They are applications of the same principle that [redacted] identified in therapeutic psychology: that unconditional positive regard is the most transformative thing one human being can offer another.

The Global Justice Report concludes with a call for a Global Citizen Movement for Social Justice — one that 'combines insights from Rousseau, Marx, Durkheim, Keynes, Rawls and Sen'. This

plan adds one more tradition to that list: the contemplative and mystical one, which understands that the transformation of political and economic systems is ultimately inseparable from the transformation of the people who are trying to bring it about.

7.3 The Revolutionary Life

The work of addressing the climate emergency moves in three rhythms that must be held together if it is to be sustained across the years required:

The first is return to the whole: before acting, holding the bigger picture. You are a temporary being in a vast, interconnected world. Life has value beyond outcomes. The human experiment — four billion years of evolution arriving at creatures who can understand their own predicament and choose to act differently — is extraordinary beyond any individual's contribution or failure to contribute. Do not mistake the node for the network.

The second is the work itself: knocking on doors, training, building assemblies, developing relationships across the organisational silos, showing up in the rain. The ordinary work is the extraordinary work. There is no shortcut to the ten thousand hours. And the ten thousand hours, accumulated across a network of people who have all made the same decision, creates something no individual effort could.

The third is return to the whole again: stepping back from ego and attachment. The work is not about any individual. It must be possible to hand it over, to let others take your place, to disappear without resentment when your moment is done. The change that is needed is larger than any of us. Our job is to be useful for the time we have, and then to make room.

> ***Liberté, égalité, fraternité, ou la mort!***

Conclusion

The parallels between the rise of fascism in the 1930s and the advance of the climate emergency today are not coincidental. Both feed on indifference. Both exploit the human tendency to believe that a catastrophe consuming other people's lives has nothing to do with us. Both are defeated only when enough people refuse that comfortable lie — and speak out.

[redacted] was a German pastor who welcomed Hitler to power in 1933, believing the new regime would bring national renewal. He changed his mind in prison, where he spent eight years. After the war, he spent the rest of his life repeating a confession[5].

[redacted] genius was the structure: the narrowing circle of victims, each ignored by those who came next, until the circle closed around the speaker himself. The confession works because it is universal. People recognise themselves in it — the person who did not speak out because it was not yet their turn.

Climate change operates by exactly the same logic. It comes for the most vulnerable first. The elderly in the heatwave. The farmer in the drought. The islander watching the sea rise. And people do not speak out — not because they are evil, but because it has not yet come for them. The prose that follows is my version of [redacted] confession for our time:

> *First it came for the elderly and the very young —*
> *those felled by heatwaves, those whose lungs could not bear the smoke.*
> *I said nothing, because I was neither old nor young,*
> *and the summer that killed them felt, to me, like a holiday.*
>
> *Then it came for the subsistence farmers of the Sahel,*
> *the rice growers of Bangladesh, the herders of the Kalahari —*
> *I said nothing, because their suffering was distant*
> *and the food on my table had not changed.*
>
> *Then it came for the coral reefs, the glaciers, the ancient forests —*
> *ecosystems that existed before our species walked the Earth.*
> *I said nothing, because I had never seen them,*
> *and loss on that scale is difficult to grieve.*
>
> *Then it came for the coastal cities —*
> *Mumbai, Miami, Jakarta, Amsterdam, Shanghai…*
> *I said nothing, because my own street was still dry,*
> *and the news had been using the word 'unprecedented' for so long*
> *that I had stopped hearing it.*
>
> *Then it came for the harvests, the aquifers, the breathable air —*
> *the stable atmosphere in which our civilisation was founded.*
>
> ***Then it came for me —***
> ***and there was no civilisation anymore.***

There is one crucial difference between [redacted] prose and mine. [redacted] was speaking after the catastrophe. He was making a confession. I am writing before it. The catastrophe is not yet complete. The circle has not yet closed.

People beat fascism in the 1940s. Societies that had been passive found, at the last viable moment, the will to act. The same must be true now. The Global Justice Platform is not a fantasy:

[5] https://encyclopedia.ushmm.org/content/en/article/martin-niemoeller-first-they-came-for-the-socialists

it is a quantified, technically feasible plan, developed by 45 of the world's leading economists, that would limit global warming to 1.8°C whilst doubling the income of 89% of humanity. The financing mechanism exists. The technology exists. The report ends with a single sentence about "organised political struggle" — The action plan set out in this document tells you how.

You need to radicalise for the sake of our country, our planet, and our species. Focus on raising the alarm by the widest possible mobilisation, joining with and energising progressive non-violent direct-action groups. Coalesce around a more radical green socialist agenda and encourage a more assertive non-violent approach:

> ***We will claim nothing, we will ask for nothing. We will take; we will occupy!***[6]

Organise "people's coalitions" of local protest groups. Get each group to mobilise a thousand citizens onto the streets and to occupy strategic buildings. Replicating this internationally will be a direct threat to big business and central governments.

Call an all-out general strike, not just nationally, but globally. Demand that the gas and oil CEOs and richest billionaires stand trial in the International Court in the Hague on charges of Ecocide. Convict them, nationalise their assets and redistribute them for the common good; to save the climate, and end social injustice.

We are 8 billion global citizens against the entities who seek to supress us and destroy our world. They have the power, the wealth, and the military at their disposal, but global citizens have the numbers. Revolutionaries won't need guillotines this time, all people need to do is to unite and stay united until they win.

That is why the general population terrifies the rich and powerful, and they do all that they can to keep us divided. They use perpetual war to set race against race, religion against religion, and colour against colour.

The last English revolution was in 1688 and the next one is long overdue, but if another revolutionary situation arises, it won't be because everyone wakes up one morning with the intention of overthrowing the system. It will be because a significant minority of the population responds to a much more localised and specific attack on its interests. If that isn't the situation that we find ourselves in now then it never will be. This is no longer about charitable concern for our less fortunate comrades overseas; it is now about self-preservation.

If it is the future you seek, then I tell you that you must come to it with empty hands. You cannot take what you have not given, and you must give yourself. You cannot buy the revolution. You cannot make the revolution. You can only be the revolution. It is in your spirit, or it is nowhere[7].

Act now! – see Appendix A

8

[6] revolutionary slogan that originated during the May 1968 protests and civil unrest in France
[7] Ursula K. Le Guin, The Dispossessed: An Ambiguous Utopia
[8] Artwork by Mr. Fish, can be purchased here: https://rev21.earth/product/20-mr-fish-postcards/?ref=rogerhallam.com

Appendix A — Non-Violent Direct Action

Numerous environmental non-governmental organizations (NGOs), charities, and grassroots pressure groups actively employ **Non-Violent Direct Action (NVDA)** as a primary strategy to combat climate change. These entities use civil disobedience, peaceful disruption, and public protests to demand systemic climate policy changes and an immediate end to fossil fuels. Don't just join one, join as many as you can, build bridges and networks so that these disparate oases of hope come together as a unified global force for change:

UK

- **Revolution in the 21st Century (Rev21)** - seeks to develop and support a global movement for systemic democratic and social transformation https://rev21.earth/
- **Extinction Rebellion UK** –has shifted toward localized smaller-scale actions and everyday non-cooperation. https://extinctionrebellion.uk/
- **Youth Demand** — Youth Demand JSO offshoot https://youthdemand.org/
- **Take Back Power** - launched from ex-JSO organisers. https://takebackpower.net/
- **Fuel Poverty Action** - grassroots-led organisation fighting for real solutions to the cold homes crisis, and to preserve the climate that we all depend on https://www.fuelpovertyaction.org.uk/
- **Reclaim the Power** - direct action network fighting for social, environmental and economic justice https://reclaimthepower.org.uk/
- **350.org** – organises periodic mass civil disobedience https://350.org/?r=GB&c=EU
- **Rising Tide** uses direct action to confront the root causes of climate change https://risingtide.org.uk/

Europe

- **Neue Generation** focuses on defending democracy alongside climate protection https://neuegeneration.com/
- **Widerstands-Kollektiv!** pursues self-initiated, guerrilla-style interventions https://widerstands-kollektiv.org/
- **Ende Gelände** –decentralised alliance running mass civil-disobedience blockades of coal mines and fossil infrastructure. https://www.ende-gelaende.org/
- **Letzte Generation -** relies on traffic blockades and public infrastructure disruptions to protest government climate inaction. https://letztegeneration.org/
- **Fossielvrij NL** a citizens' movement that breaks the power of oil, coal, and gas companies https://fossielvrij.nl/
- **Milieudefensie** focus on putting pressure on 30 of the largest CO_2 emitting multinationals with a base in the Netherlands https://en.milieudefensie.nl/

United States

- **Sunrise Movement** – youth-led political movement that utilizes sit-ins, occupations, and non-violent blockades https://www.sunrisemovement.org/
- **Planet Over Profit** –blending climate and social-justice direct action https://planetoverprofit.org/
- **Climate Defiance** - direct action to defeat fossil fuel fascism https://www.climatedefiance.org/
- **Oil Change International** exposing the true costs of fossil fuels and facilitating a just transition to clean energy https://oilchange.org/
- **Indigenous Environmental Network** direct actions and public awareness, building the capacity of community and tribes to address economic justice issues https://www.ienearth.org/
- **Earthworks** mobilizing to protect the climate and frontline communities from Trump's agenda https://earthworks.org/

Global

- **Greenpeace International** - the original and oldest non-violent direct-action organisation. Study, learn and pay respect, we follow in the footsteps of heroes and there will be no revolution without an endorsement from Greenpeace https://www.greenpeace.org/international/
- **Friends of the Earth International**: integrates localized NVDA into its broader climate justice campaigns https://foe.org/
- **Environmental Investigation Agency (EIA)** pioneers of undercover investigations, actions and tactics to expose and combat environmental crime. Specialists in climate super pollutants https://eia-international.org/
- **Climate Justice Alliance (CJA)**: utilizes direct action alongside community organizing to resist corporate environmental racism https://climatejusticealliance.org/
- **Climate Action Network (CAN)** - coordinates and supports civil society actions https://climatenetwork.org/
- **Earth Quaker Action Team** - Quaker group using non-violent direct action for climate justice https://eqat.org/
- **Earth Guardians** - revolutionary environmental nonprofit that provides youth with the resources and training needed to create climate justice-driven solutions https://www.earthguardians.org/
- **Blockade Australia** –blockade-style NVDA against fossil fuel export infrastructure https://www.blockadeaustralia.com/
- **Scientist Rebellion** for confronting officials and executives at public events https://scientistrebellion.org/
- **Rainforest Action Network** Taking action against the companies and industries driving deforestation and climate change https://www.ran.org/
- **Amazon Watch** Delivering timely, flexible resources to Indigenous leaders and organizations, empowering them to defend their rights, territories, culture, and autonomy in the face of repression and violence https://amazonwatch.org/
- **Christian Climate Action** carrying out acts of public witness, nonviolent protest and civil disobedience to urge those in power to make the changes needed https://christianclimateaction.org/
- **GreenFaith** rising together to end the era of extraction and exploitation and to create bold transformation https://greenfaith.org/
- **Beautiful Trouble** toolkit to plan innovative Nonviolent Action https://beautifultrouble.org/

Appendix B — Key Climate Data

Temperature and Emissions

Global warming as of 2025:	1.6°C above pre-industrial
CO2 concentration (Mauna Loa, May 2025):	430 ppm
Pre-industrial CO2 baseline:	280 ppm
Rate of annual CO2 increase:	3.54 ppm (2023–24, accelerating)
Rate of warming since 2010:	0.37°C per decade
Atmospheric methane concentration:	>1,920 ppb (rising >11 ppb/year since 2020)
IPCC climate sensitivity:	3.0°C per CO2 doubling
Hansen climate sensitivity (high end):	4.5°C per CO2 doubling (>99% confidence)
CO2 doubling expected at current rates:	~2062
Projected 2°C date:	2030–2035
Carbon budget remaining for 2°C:	~4–5 years at current rates

Global Justice Report Scenarios

GJR baseline warming by 2100 (current policies):	Over 4°C
GJR Sustainable Convergence warming by 2100:	1.8°C
Cumulative emissions — baseline:	~5,000 gigatonnes CO2e by 2100
Cumulative emissions — GJP scenario:	~700 gigatonnes CO2e by 2100
Annual climate investment required:	3–4% of world GDP per decade to 2055
GJF total annual expenditure (2026–2060):	10.3% of world GDP per year
Current total development aid:	0.3% of world GDP

Human Consequences

Deaths at 2°C:	2 billion (UK insurance industry baseline)
Deaths at 3°C:	4 billion (UK insurance industry baseline)
People at unlivable heat risk at 2.7°C:	~4 billion
Forced relocations at 2°C (heat alone):	~1 billion
GJP — share of world population doubling income by 2100:	89%
GJP — share of Global South population doubling income:	99%

Appendix C — The Global Justice Fund at a Glance

Source: Global Justice Report, World Inequality Lab, 2026 (https://globaljusticeproject.wid.world/). Contributors include Thomas Piketty, Gabriel Zucman, Lucas Chancel and 42 other researchers.

Element	Description	Scale
Global Wealth Tax	Progressive annual levy on top 1% of world wealth holders; rising to 20% on billionaires	Primary revenue source 2026–2035
Global Income Tax	Progressive levy rising to 90% at very top of income distribution	Supplements wealth tax
World Sovereign Fund (WSF)	Active portfolio of sustainable assets, funded by reinvesting tax revenues	60% of world GDP; 10% of world capital stock
Country Dividends	Equal per-capita payments to all countries for climate, education & health	5–8% of world GDP p.a. (2030–2050)
Climate Investment	Financed through country dividends	3–4% of world GDP p.a.
Education & Health	Financed through country dividends, converging to €8,400 and €14,400 per capita	Rising share of country dividends
International Clearing Union	New international reserve currency; ends exorbitant privilege (0.6–0.8% world GDP transfer from South to North)	Institutional reform
UN Central Bank (reformed IMF)	Genuinely democratic institution; one-person-one-vote	Institutional reform
Total GJF expenditure	Vastly exceeds current development aid (0.3% world GDP)	10.3% world GDP p.a. (2026–2060)

The Global Justice Report is available at https://globaljusticeproject.wid.world/. It was produced under Creative Commons Licence CC BY-NC-SA 4.0 and may be shared and adapted for non-commercial purposes with appropriate credit.

Appendix D — The Top 20 Global Companies (2026)

Source: Forbes Global 2000, 2025 ranking, compiled from sales, profits, assets and market value data. The 2,000 companies on the list together account for $52.9 trillion in annual revenue, $4.9 trillion in profit, $242.2 trillion in assets and $91.3 trillion in market value.

Rank	Company	Country	Industry
1	JPMorgan Chase	United States	Banking
2	Berkshire Hathaway	United States	Insurance / Diversified
3	ICBC	China	Banking
4	Saudi Aramco	Saudi Arabia	Oil & Gas
5	Amazon	United States	Retailing / Technology
6	Bank of America	United States	Banking
7	China Construction Bank	China	Banking
8	Agricultural Bank of China	China	Banking
9	Alphabet (Google)	United States	IT Software & Services
9	Microsoft	United States	IT Software & Services
11	Apple	United States	Technology Hardware
12	Bank of China	China	Banking
13	ExxonMobil	United States	Oil & Gas
14	Toyota Motor	Japan	Consumer Durables
15	HSBC Holdings	United Kingdom	Banking
16	Wells Fargo	United States	Banking
17	UnitedHealth Group	United States	Insurance
18	Walmart	United States	Retailing
19	Samsung Electronics	South Korea	Technology Hardware
20	Goldman Sachs Group	United States	Diversified Financials

Note that Saudi Aramco (#4) and ExxonMobil (#13) — representing the fossil fuel industry's continued dominance of the global economy — hold more combined market value than the GDP of most countries. Both will become stranded assets under any credible 2°C pathway. Their continued presence in pension funds, ISAs and sovereign wealth funds represents a systemic financial risk that regulators and fund managers are beginning to acknowledge but have not yet addressed at the required scale.

Appendix E — The Top 20 Global Billionaires (2026)

Source: Forbes World's Billionaires List 2026. A record 3,428 billionaires now exist globally, with a combined net worth of $20.1 trillion — an increase of $4 trillion in a single year, driven substantially by the AI investment boom.

Rank	Name	Country	Net Worth ($bn)
1	[redacted]	United States	839
2	[redacted]	United States	257
3	[redacted]	United States	237
4	[redacted]	United States	224
5	[redacted]	United States	222
6	[redacted]	United States	190
7	[redacted] & family	France	171
8	[redacted]	United States	154
9	[redacted]	United States	149
10	[redacted]	Spain	148
11	[redacted] & family	United States	146
12	[redacted] & family	United States	143
13	[redacted]	United States	141
14	[redacted]	United States	134
15	[redacted]	United States	126
16	[redacted] & family	Mexico	125
17	[redacted]	Canada	110
18	[redacted]	United States	109
19	[redacted]	United States	108
20	[redacted] & family	France	100

Total net worth of the top 20: approximately $3.43 trillion — roughly the size of the entire United Kingdom economy, held by twenty people. [redacted] fortune of $839 billion alone exceeds the entire 2019 top-20 combined. The Global Justice Report's wealth tax proposal (20% per year on billionaires) would, if applied to [redacted] alone, generate approximately $167 billion in revenue in its first year — equivalent to twice the UK's current annual NHS capital budget.

If billionaires invest more in space travel than in environmental projects, what does this tell us about their prognosis for the future of our planet:

[redacted]: Founded SpaceX in 2002 with an initial $100 million of his PayPal fortune. His overarching goal is to reduce launch costs and enable humanity to colonize Mars. He has contributed $100 million to fund Direct Air Capture (DAC) and industrial carbon sequestration technologies.

[redacted]: Founded Blue Origin in 2002, [redacted] liquidates about $1 billion of Amazon stock annually to fund the venture, with his total personal investment now exceeding $10 billion. He has also disbursed $2.4 billion funding large-scale reforestation.

[redacted] Founded Virgin Galactic in 2004 to focus on suborbital space tourism. [redacted] invested an estimated $880 million. He has deployed under $300 million in Agrofuel research, renewable energy tech via Virgin Fuels, and the Virgin Green Fund.

Appendix F — Geoengineering

The geoengineering proposals reproduced in my 2020 report — marine cloud brightening and the more speculative Black Sea hydrogen sulphide conversion scheme — remain options of genuinely last resort, to be considered only if mitigation and adaptation prove insufficient. Nothing in the intervening six years has reduced the risks involved in unilateral geoengineering, and nothing has made such schemes more politically deliverable. They are retained here, as in 2020, not as policy recommendations but as evidence of how seriously the scale of the emergency must be taken if conventional routes continue to fail.

When we achieve net zero, historic emissions will continue to cause temperatures to rise, even if we achieve net zero before global warming becomes unstoppable due to positive feedback from the Earth's climate control mechanisms. The problem is that we have no way of knowing how close we are to reaching irreversibility, or if we have already passed a tipping point. Claims that we have ten years left to solve the problem are based on hope, not science.

Unfortunately, we may have to resort to geoengineering, or climate engineering and solar radiation management. This is obviously very controversial and poses many problems and risks. However, under a nightmare scenario of runaway global warming, it might be the least bad option.

"Marine cloud brightening" will involve ships the size of large super tankers using wind power to spray saltwater into the clouds above the Arctic. Once airborne, the salt particles will act as "cloud condensation nuclei", meaning they will facilitate the condensation of water vapour into liquid. As more water droplets are created, clouds will appear larger and brighter.

These brighter clouds will reflect away more sunlight resulting in local cooling. Research studies based on modelling suggest that marine cloud brightening may be able to restore artic ice cover and permafrost. However, concerns remain over how marine cloud brightening could affect other aspects of the climate system. The large and very localised effect could lead to regional variations in the climate response. These variations could lead to unfavourable weather in some parts of the world, by upsetting weather patterns, ocean circulation and local biology. Alternatively, there is an even more radical solution which will also solve another growing safety issue:

The Black Sea as we know it today was formed at the end of the last ice age when glacial melt water caused extensive flooding resulting in water levels in the then land locked Black Sea rising until it breached the Europe / Asia land bridge, about 7300 years ago. Since then, anoxic conditions have existed in the deepest parts of the basin, caused by density stratification following an influx of Mediterranean water through the Bosporus. Hydrogen Sulphide (H_2S) is produced by sulphur reducing bacteria at an approximate rate of 10,000 tonnes per day, and it poses a serious hazard. The impact of a meteor, asteroid or nuclear explosion in the Black Sea would cause a poisonous H_2S gas release into the atmosphere. The effects of this scenario have been modelled and evaluated in numerous papers[9]. With the population of Istanbul now exceeding 15.52 million, potential fatalities are horrendous. There are also vulnerable ethnic minorities in the region such as the Crimean Tartars or Georgian Abkhaz who could be wiped out by such an event.

Papers have suggested converting the H_2S into hydrogen gas and solid elemental sulphur[10], but this will be a very expensive and energy consuming process. It will be much more sensible to convert the H_2S into SO_2. This process will be very energy productive and could supply the region with cheap electricity.

SO_2 is unique amongst industrial pollutants in that it has a net global cooling effect, i.e. a negative global warming impact. According to estimates, one kilogram of SO_2 injected into the stratosphere will offset the warming effect of several hundred thousand kilograms of carbon dioxide[11].

[9] http://journals.ametsoc.org/doi/pdf/10.1175/EI218.1
[10] http://www.researchgate.net/publication/228371356_Possibilities_of_production_and_storage_of_hydrogen_in_the_Black_Sea
[11] https://www.foreignaffairs.com/articles/arctic-antarctic/2009-03-01/geoengineering-option

The required altitude to enter the stratosphere is the height of the tropopause, which will be about 14 km above the surface of the Black Sea. An injection regime will be required to allow SO_2 to enter the rising leg of the Brewer-Dobson atmospheric circulation.

The Free-Floating Stratospheric Aerosol Injection (SAI) Balloon System is a high-TRL, scalable geoengineering approach that utilizes a decentralized array of thousands of autonomous, biodegradable balloons to deliver sulphur dioxide to the lower stratosphere. By utilizing passive, altitude-targeted rupturing at 14km–19km, the system eliminates the need for complex tethered infrastructure, allowing for linear scalability via daily, distributed launches while minimizing risks through controlled, localized atmospheric deployment.

The concept could materialise as floating oil rig like structures near the centre of the Black Sea, extracting H_2S, burning it in combined cycle turbines. The resultant electricity would be shared between the countries bordering the Black Sea and their immediate neighbours who would be economically disadvantaged if omitted from this project; Turkey, Bulgaria, Romania, Ukraine, Russia, Georgia, Crimea (disputed sovereignty), Moldova, and Armenia.

This solution is not as farfetched as it might appear. Global cooling caused by stratospheric injection of SO_2 is the principal atmospheric and global impact of volcanic eruptions. The amount of SO_2 released by volcanoes is much less than from man-made sources but, volcanic gases reach the stratosphere during large eruptions. For eruptions in the last 25 years, El Chichon and Mount Pinatubo emitted the greatest amounts of SO_2 into the stratosphere. El Chichon produced 7 Mt of SO_2 and Mount Pinatubo produced 20 Mt. Both volcanoes are at low latitudes but they both had high eruption rates.

The risks are both high and obvious, modelling is never 100% accurate and if the SO_2 falls back into the troposphere it will oxidise to SO_3, then hydrate to sulphuric acid before falling back to ground level as acid rain. If this geoengineering project works but is interrupted prematurely, due to war or plant failure, then global temperatures will rise very rapidly, potentially leaving us in a worse position than if the project had not been attempted.

Appendix G — Sources and Further Reading

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- Global Justice Project: GlobalJusticeProject.wid.world
- World Inequality Database: wid.world
- Centre for Local Economic Strategies (Preston Model): cles.org.uk
- Great British Energy: gov.uk/government/organisations/great-british-energy

- Bridgetown Initiative: bridgetowninitiative.com
- Rev21: rev21.earth

Scientific Note on Climate Sensitivity

The IPCC's official central estimate of equilibrium climate sensitivity (the warming from a doubling of CO2) is 3°C, with a likely range of 2.6°C to 3.9°C and a very likely range of 2.3°C to 4.7°C. James Hansen and colleagues have published peer-reviewed analysis placing the figure at 4.5°C, at the high end of but within the IPCC's very likely range. This document references both figures. The political and strategic arguments made in this plan do not depend on Hansen's higher estimate being correct: they are fully justified by the IPCC's own consensus figures. However, recent observed temperature data — which has outpaced mainstream model predictions — is more consistent with Hansen's higher estimate than with the IPCC's lower one, and the precautionary principle demands that we take the higher estimate seriously when the consequences of underestimating it are irreversible.

Appendix H — About the Author

[redacted] F.INST.S.M.M. GCGI M.INST.R

[redacted] is internationally recognised as a leading authority on sustainable refrigeration, air conditioning and HVAC, with over 40 years of experience at the forefront of the cooling and building services industry. He has provided refrigerant environmental impact assessments and technical guidance to blue-chip corporations, the UK Government, the European Commission and the United Nations, and has delivered ground-breaking projects across nuclear, pharmaceutical, data centre, heritage and commercial environments in more than twenty countries.

His career spans the full arc of the sustainable refrigerant transition: from designing and commissioning the UK's first propane air conditioning system in 1994, through patenting novel high-pressure natural refrigerant blends, to providing specialist cooling engineering on one of the largest nuclear new-build projects in European history. He is a published author and internationally sought conference speaker, with keynote addresses delivered on five continents to audiences including the United Nations, Greenpeace, the European Commission, the IIR (International Institute of Refrigeration) and major industry bodies across the US, Asia and Europe.

[redacted] holds security clearances for the Metropolitan Police, Security Service and SC1, and has worked professionally in Belgium, Canada, China, Denmark, Dubai, France, Greece, India, Italy, Korea, Kuwait, Luxembourg, Macedonia, Norway, Panama, Poland, Slovakia, Sweden, Ukraine and the USA. He is a Fellow of the Institute of Sales & Marketing Management, a Graduate of the City & Guilds Institute, and a Member of the Institute of Refrigeration.

Electoral Record

Election	Candidate	Result
County Council, Hoddesdon North, May 2017	[redacted] (Green)	5% of the vote
District Council, Stanstead Abbotts, May 2019	[redacted] (Green)	15.9% of the vote
General Election, Broxbourne, December 2019	[redacted] (Green)	2.7% of the vote
District Council, Ware Trinity, May 2023	[redacted] (Green)	29.32% of the total votes, 54.22% turnout share (of ballots) ELECTED
General Election, Hertford and Stortford, July 2024	[redacted] (Green)	8.1% of the vote

Positions Held

- Greenpeace member
- Environmental Investigation Agency (EIA); life member,
- XR Political Liaison Officer
- Parish Councillor, Stanstead St Margarets (co-opted February 2018)
- East Herts District Councillor, Ware Trinity (elected May 2023)

[redacted] • [redacted]

J0115

Dear OPRED Business Support Team,

I am reaching out with a strong request to deny approval for the Jackdaw gas field (ref D/4260/2021) and the Rosebank oil field during this critical consultation period.

Previously, the Court of Session annulled the consents because the environmental impact of burning these fuels was overlooked. Now, the significant emissions from these projects are undeniable. Rosebank alone could unleash up to 200 million tonnes of CO_2, surpassing the annual emissions of the 28 lowest-income nations combined, with Jackdaw contributing an additional 35.8 million tonnes. The International Energy Agency insists that pursuing new fossil fuel developments contradicts the path to net-zero emissions.

These endeavors fail to secure energy independence, as the extracted resources will serve global markets without alleviating domestic energy costs. Sanctioning such projects, especially in a year marked by severe heatwaves linked to climate change, which claimed numerous lives, would be a grave oversight.

I strongly urge the Secretary of State to reject these proposals.

J0116

Dear Sir / Madam

The importance of supporting North Sea projects

I am writing to urge you to support the continued development of projects such as Jackdaw and Rosebank.

These projects have already attracted substantial investment and are well advanced. They could generate £1.4billion in tax revenues before the end of this Parliament and £3.8billion by 2034, as well as supporting thousands of high-quality jobs, apprenticeships and supply chain businesses across Scotland and the UK.

They will also play a part in strengthening the UK's energy security and generating tax revenues that help fund public services. Producing oil and gas from UK waters also results in significantly lower emissions than importing equivalent LNG supplies from overseas.

As the owner of small businesses based in Aberdeen for more than 30 years - employing people and paying Corporation Tax throughout that time - I can tell you the consequences of the current policy direction are already being felt.

Two of our clients - a drilling company and an offshore crane company - have already drawn red lines through our contracts, reducing our annual revenue by £80,000 overnight.

This has happened solely because the Government turned its back on an industry that will continue to keep the lights on while renewable energy capacity is expanded.

Businesses like mine are not asking for special treatment - only for a pragmatic, evidence-based approach that protects jobs, investment and energy security during the transition to net zero.

I hope you will give this matter your serious consideration.

J0117

I fully approve and endorse granting licenses for this development as it will stabilise infrastructure.

J0118

I am writing to give my opinion on the Jackdaw Field Development Public Consultation Ref.No. D/4260/2021.

I am strongly in favour of the Jackdaw Field Development proposal receiving all the approvals it needs to proceed. The UK is struggling for economic growth and this development represents a significant multi million pound investment in the UK . These are the projects that the country needs to provide well paying jobs in the UK, maintain an essential skilled workforce here and provide valuable tax revenue to pay off the nation's debt.

This type of project needs urgent approval as it is a tie-back to existing larger production infrastructure and pipelines that will be removed at some time in the future. This gas production could be available in a very short time frame, 2007, for domestic consumption, giving the country a tax revenue stream as opposed to paying for gas imports via pipeline or LNG tankers.

The UK government should also consider purchasing gas from Jackdaw during the summer, when prices are low, to vastly increase the country's strategic gas reserve capacity. This will give the UK much greater resilience in the face of shortage of supply and price shocks in the future. A large national gas reserve would allow the government

to smooth out the price spikes caused by global affairs and other disruptions to supply.

The UK's contribution to global carbon dioxide emissions is only approximately 1.0% per year, this project will only make a very minute difference, especially when compared to the over 50% of annual carbon dioxide emissions from just China, USA and India. Protestors against this project on the basis of carbon emissions are basically supporting foreign industrial developments in highly polluting countries and harming the UK economy.

Throughout this nation's transition to net zero by 2050, the country will continue to rely on secure sources of gas to back-up renewable power supplies and feed other industry needs. Domestic supplies of gas are always going to be "low carbon" when compared to the alternative carbon cost of, less secure, imported gas via pipeline and, even more so, gas imports via LNG shipment..

I strongly recommend that the Secretary of State and Oil and Gas Authority grant the approvals to allow the Jackdaw Fiield Development to proceed.

J0119

To Whom It May Concern

I wish to register my objection to approving the Jackdaw and Rosebank oil and gas fields. The world is on fire and we are in the middle of a massive heatwave; we are now experiencing the consequences of the climate crisis caused by burning fossil fuels.

J0120

Dear OPRED,

With wildfire blazing in my part of Scotland and across Europe, surely this is the wakeup call our Government in Westminster (or Manchester) needs to stop all new oil and gas fields!? If any of you have children or grandchildren you need to act in their interests NOW! Climate change is only going accelerate and destroy everything we hold dear and, if you think we have a 'migrant crisis' now, it is only going to get worse as people try to escape the ravages of Climate Change.

Please do not give license to Rosebank or Jackdaw, I urge you to listen!

J0121

The climate emergency is no longer the future; we are living in it now. Scotland's moorlands, at the time of writing, have been on fire for nine days, combatted not by professionals but estate workers, volunteers, charity workers. The land is peat, which will continue burning underground, releasing CO2 into the air.

We cannot resume drilling at Rosebank and Jackdaw, but need urgent, accelerated action into renewable energy. Energy bills are the least of our worries with a world on fire.

There is literally nothing more important than combatting the climate emergency.

J0122

Dear Madam or Sir,

I wish to add my support to approval of the Rosebank and Jackdaw petroleum developments. I care very much about the worldwide climate and all of our population, particularly governments, must do what they can to lower the impact on the environment globally rather than prioritise national statistics which are meaningless for the world as a whole. Hence the development of local energy must go ahead in favour of importing petroleum from further afield. I agree that cleaner forms of energy would be preferable but the reality is that the UK is not yet in a position that we do not still rely on petroleum products for manufacturing, power and transport.

I've read that politicians remark that producing more oil and gas in the U.K. will not reduce the fuel bills for industry and homes. Whilst that may be true, it will create more revenue in terms of taxes which increase the ability of the government to subsidise those costs to industry and homes. There are direct taxes on the oil companies and income taxes from all of those jobs the approval of the developments will create. It also means less expenditure on unemployment benefits.

On so many fronts, e.g. climate and economic, a quick approval of those developments and production from as many local petroleum reservoirs makes sense. It should not be difficult to do what I think is so obviously the right thing.

J0123

There is currently a horrific wildfire burning Scotland's Cairngorms. That you would even consider allowing licenses for Jackdaw & Rosebank with this backdrop is just mind blowingly awful.

Stop Jackdaw. Stop Rosebank. No new oil and gas now, or ever.

J0124

Hello

In light of the recent and ongoing wildfires and extreme weather experienced locally in Scotland I am deeply concerned at our continued reliance on fossile fuels and the subsequent environmental pollution it contributes towards.

We have so little time left to slow down rising temperatures and avoid the worst of the climate catastrophe that has clearly already reached us. I have concerns that oil and gas drilling will be relaxed under and fear that the goal of achieving net-zero emissions is not being seriously upheld. Approving developments like Rosebank or new North Sea licenses undermines global limits on warming and is causing increasingly catastrophic damage to our communities, health and wildlife.

I urge you to support a rapid transition to renewables, to enforce tougher climate and emissions scrutiny that refuses approval for Rosebank and Jackdaw to drill and extract.

Thank you for you time.

J0125

Dear Sir/Madam,

I wish to formally object to the proposed Jackdaw Field Development.

I live in Scotland and have watched with growing alarm as wildfires have continued to burn in the Cairngorms for days. Regardless of any single event, the scientific evidence is clear that climate change is increasing the likelihood and severity of extreme weather, including prolonged heat, drought and wildfire conditions. These events are no longer distant or theoretical - they are affecting our own landscapes and communities.

The UK has committed to reducing greenhouse gas emissions and limiting global warming. Approving new fossil fuel developments that will result in substantial additional emissions is inconsistent with those commitments and risks undermining both domestic and international climate goals.

I ask that full weight is given to the downstream (Scope 3) emissions arising from the combustion of the gas produced by this project, as required following the recent court judgments. The environmental impacts should be considered over the lifetime of the development, not simply the emissions generated during extraction.

Investment should be directed towards renewable energy, energy efficiency, storage and a just transition for workers rather than locking the UK into decades of additional fossil fuel production.

For these reasons, I urge the Secretary of State to refuse consent for the Jackdaw Field Development.

J0126

Hi,

In light of recents events made worse by extreme weather close to my home in the Cairngorms, across the rest of the UK, France, Spain, Canada, China and beyond, I would like to express my strong opinion to oppose Jackdaw and Rosebank. I fear that further supporting oil and gas is contributing negatively towards this increase in adverse weather events.

Regarding the claim that they will 'bring down energy bills': although oil is extracted domestically, it's sold on international markets, which decide the price the UK must buy it for. We are still at the mercy of the international fluctuation in prices, even if it's fuel extracted from our own waters.

What will bring our costs down is investing in local renewables, which bring money back into our communities and are entirely independent of the global gas and oil markets.

Regardless of whether people believe in climate change or not, we can't deny that recent weather is contributing to disasterous events that we are unprepared to deal with. We need to start listening to the facts and think strategically about alternatives to gas and oil. Until we take this more seriously and take progressive action on the changing climate, I am honestly scared for our futures.

J0127

Britain remains heavily dependent on natural gas for its power generation. Whilst we all support a move to renewables this is clearly not a solution that can be activated within days. Whilst we transition to a more renewables based energy production it makes sense to produce our gas need as much as possible domestically rather than importing from unstable economies such as Russia or the Middle East.

J0128

Dear Sirs/Madam,

I am writing to submit a representation on the Jackdaw Field Development consultation.

I wish to state my objection to any new oil and gas developments such as the Jackdaw field.

At a time when a major wildfire has been burning in the Cairngorms for over 10 days - not far from where I live with far-reaching critical impacts for local people, landscape, nature and economies - and devastating wildfires are affecting communities across Europe, approving new fossil fuel extraction is a morally objectionable and dangerous thing to do.

I believe that we urgently need to reduce greenhouse gas emissions, not lock in further oil and gas production. I ask that these climate impacts are given full weight in the decision-making process.

J0129

Dear Opred

As I write we are in the worst drought I have ever experienced. Worse than 1976 because now, as an adult, I know that it's our fault, and that, even though science shows it and we have all known it now for decades, those in power continue to recklessly perpetuate the cause of this destruction.

My husband is a gardener, and is watching his business die along with his plants. The beech trees on the hill are dying. The baby birds are flinging themselves out of the nest and dying. The hillsides are burning. The peat is burning.

For all our sakes stop the oil.

Enough.

We know what needs doing, we have the technology to do it. Now is past time to act. You will read this (or not read this) with a sense of weary apathy because you will have received so many like it. Even as so many people turn away, because they are so powerless. You are not powerless. You can help stop this, and you must. You must.

J0130

Dear OPRED,

My name is [] and I write to you in response to [] disastrous plans to approve new oil and gas drilling at the Rosebank and Jackdaw fields, I stand with [] who states expanding fossil fuel extraction would do nothing to lower bills or improve energy security while accelerating the climate crisis.

The proposed drilling at Jackdaw and Rosebank must not proceed. Hear the pleas of the people, and see the fires that burn across our country. Just this week fires wreak destruction across the Cairngorms, and across the UK. You have the power to actively prevent further betrayal to our Earth. The very life force that sustains you, your families and futures.

If not for the environmental costs, you must surely see this is "environmentally disastrous and economically illiterate" as Zack Polanski points out?

Make the decision that is for everyone. We are all watching.

J0131

To the Offshore Petroleum Regulator for Environment & Decommissioning

Re: Rosebank and Jackdaw oil and gas field developments

References: ES/2022/001 and D/4260/2021

I am writing to strongly object to consent being granted for both the Rosebank oil field and Jackdaw gas field.

I am writing at a time when the reality of climate breakdown is becoming impossible to ignore. We are seeing extreme heat, devastating wildfires and communities being evacuated from their homes, including in the Cairngorms, one of the UK's most important areas for nature and wildlife. Watching these places burn while knowing that the climate is becoming increasingly unstable is deeply distressing.

Against this backdrop, I find it incomprehensible that we are still considering approving new fossil fuel developments that could operate for decades.

The full climate impact of these projects must be considered, including the emissions produced when the oil and gas extracted are ultimately burned. The previous approval of Rosebank was found unlawful because these downstream emissions had not been properly accounted for. The same principle must apply to Jackdaw.

This is not simply about emissions targets on a spreadsheet. It is about the world we are leaving to our children. I struggle to accept that we can see the consequences of a warming climate happening around us and still choose to invest in more fossil fuel extraction.

Nor do I believe Rosebank and Jackdaw represent genuine energy security for households in Britain. We should be reducing our exposure to fossil fuel markets, not locking ourselves into further extraction. Investment should instead be directed towards clean energy, energy efficiency and a fair transition for the workers and communities whose livelihoods have depended on the oil and gas industry.

Please refuse consent for both Rosebank and Jackdaw. We urgently need decisions that recognise the reality of the climate and ecological emergency we are already living through, rather than making that emergency harder for my children and future generations to manage.

J0132

I do not support and indeed object to Jackdaw & Rosebank oil licenses. With Europe on fire, and the fact that the Cairngorms in Scotland have been burning into their second

week now, ‘green’ issues are more important than political issues. Granting these licenses will not get my vote.

J0133

I am writing as an individual in support of approval of the Jackdaw Field Development.

I support the reduction of greenhouse-gas emissions and the UK’s transition towards cleaner sources of energy. However, that transition must recognise that the UK will continue to require substantial quantities of natural gas while sufficient dependable low-carbon alternatives are developed.

The relevant comparison is therefore not between producing gas from Jackdaw and consuming no gas. It is between producing gas from a highly regulated UK field and importing gas from overseas to meet demand that will otherwise remain.

Following the Supreme Court’s decision in Finch, the environmental impact assessment for a UK oil or gas development must consider the downstream emissions produced when its hydrocarbons are eventually used. Those emissions should be properly assessed and taken into account.

However, there is no equivalent UK project-level environmental impact assessment when gas is imported from Norway, continental Europe or through shipments of liquefied natural gas from countries such as the United States or Qatar. This creates a serious imbalance in the approval process.

Domestic gas production is assessed not only for the environmental effects of extraction and processing, but also for the emissions arising from its eventual consumption. Imported gas can be produced overseas and consumed in Britain without undergoing a comparable assessment by the UK authorities.

The Secretary of State should therefore consider Jackdaw’s Scope 3 emissions alongside the realistic consequences of refusing approval. If UK gas demand remains unchanged, the loss of Jackdaw’s production is likely to be met substantially through additional imports. The emissions from using that replacement gas would still occur.

Imports may also involve additional emissions from overseas production, processing and transportation. This is particularly relevant to liquefied natural gas, which must be cooled, transported by tanker and regasified before entering the UK network. These supply-chain emissions should form part of any fair comparison between Jackdaw and the sources most likely to replace it.

Jackdaw's gross emissions should not therefore be treated as though they would all be avoided if the project were refused. The assessment should consider the project's likely net effect on global emissions after allowing for displaced imported gas.

There are also important economic and strategic considerations. Jackdaw would support skilled employment and supply-chain activity, particularly in Scotland and the North-east; retain investment and tax revenues within the UK; contribute to the balance of payments; and improve security of supply.

These benefits do not justify weaker environmental standards. They do, however, make it illogical to impose stricter environmental scrutiny on UK production than on the imported gas that would replace it.

Climate policy should focus on reducing demand through electrification, energy efficiency, renewable generation, storage and other dependable low-carbon alternatives. Restricting domestic gas production without reducing consumption does not reduce global emissions; it simply transfers production and its economic benefits overseas.

Refusing Jackdaw will not result in the UK using less gas. It would result in jobs, investment and tax revenues moving abroad while leaving the UK to import and burn substantially the same fuel—potentially with greater supply-chain emissions.

I therefore urge the Secretary of State to assess Jackdaw against the realistic alternative of continued and potentially increased imports, rather than against an artificial assumption that refusing the development would eliminate the underlying demand.

Subject to appropriate environmental conditions, regulation and monitoring, I support approval of the Jackdaw Field Development.

J0134

See previous email sent for Rosebank same applies for Jackdaw

J0135

Dear OPRED.

I fully support the development of the Jackdaw field of the North Sea.

I live in Aberdeen and work full time in the offshore wind industry. I have almost 40 years of experience working globally in offshore energy sectors. The importance of the UK North Sea oil and gas industry is critical to support energy security, high quality jobs and

the economy. The UK will require oil and gas for a wide range of industries, including but not exclusively energy production. The use of these products spans pharmaceuticals to road surfaces and almost everything between… While there is any demand for oil and gas products in the UK, as much of that as possible should come from our own UK resources.

Please allow Jackdaw to proceed in addition to ceasing the presumption against UK oil and gas by lifting the ban on wide drilling and development activities in addition to easing the excessive tax burden driving investment away. Jobs are being lost, families are hurting, competencies built over many decades are being lost, energy security is weakened and we are importing more than necessary.

Working in renewables I understand the importance of our oil & gas industry to the whole energy and industrial strategy… Renewables and oil and gas are not mutually exclusive… oil and gas related industries support continued growth in renewables and progression of the energy transition - while simultaneously supporting our wider industrial sectors.

J0136

Dear Sir

The Jackdaw development is ready for production in the very near future. Through the failure of previous governments to follow a legal process for issuance of its licence, it falls to the current government to re-approve the project, something which the Labour party committed to do.

There are many reasons that this should be a formality, including:

- tax revenues that will be remitted to UK from profitable production

- security of supply achieved from increased home produced energy

- reduction in carbon emissions in the production and transportation

- UK jobs in the operating phase

- support for world class UK supply chain

- support the UK in attracting future commercial investments in energy development projects including renewables.

The decision should therefore be straightforward. Production in the UK reduces the need to pay $$$ to foreign countries, while giving the UK the societal benefits accruing from the commercial activity.

Conversely, a decision not to re-approve would increase dependence on foreign imports, with the societal benefits accruing to the populations in those foreign

countries. It would also result in great damage to the reputation of the UK as a location for both private and foreign state investment which will have consequences across many business sectors.

J0137

Dear Opred

We are now seeing the nightmare of humankind destruction that has been predicted over and over with increasing clarity for 50 years now. It has been largely ignored and now we are seeing the world burn.

Please, please, no more drilling. Not at Jackdaw, not at Rosebank. Invest in renewables. Don't kill us all, the grass, the crops, the wildlife, the people. Don't make more homeless or hopeless. Don't burn us to the ground for the sake of profit for a few. What is the point if everything as we know it is gone?

J0138

Dear OPRED / Secretary of State for Energy Security and Net Zero,

I am writing as an individual UK citizen to register my formal opposition to the approval and development of the Jackdaw (Ref: D/4260/2021) and Rosebank (Ref: ES/2022/001) oil and gas fields.

The reality of climate breakdown is no longer a distant threat; it is unfolding right in front of us. With devastating wildfires currently raging across Europe and directly threatening our own landscapes, including the Cairngorms in Scotland, it has never been clearer that expanding fossil fuel infrastructure is fundamentally incompatible with a stable future.

Continuing to approve new oil and gas extraction directly contradicts the UK’s climate commitments and accelerates the environmental crises we are actively witnessing.

I urge the Department to reject these field developments and focus all resources on a swift transition to renewable energy and low carbon technology.

Please acknowledge receipt of this email and confirm that it will be included in the public consultation record.

J0139

To the Business Support Team,

I am writing to submit my formal objection to the revised Environmental Impact Assessment (EIA) and the proposed development of the Jackdaw oil and gas field.

Following recent landmark legal decisions, specifically the UK Supreme Court's ruling in R (Finch) v Surrey County Council [2024] UKSC 20, it is a matter of law that downstream,

end-use emissions (Scope 3) must be fully accounted for in environmental assessments. The previous failure to properly evaluate the climate impact of burning the gas extracted from this field undermines the legitimacy of its original 2022 consent, which the Court of Session found unlawful in January 2025 on precisely these grounds.

I urge the Secretary of State to reject the operator's revised environmental statement and withhold ministerial consent on the following grounds:

1. Incompatibility with Climate Obligations

Approving new fossil fuel extraction projects sits in tension with the UK's legally binding commitment to achieve Net Zero emissions by 2050, as well as our international obligations under the Paris Agreement to limit global warming to 1.5°C.

2. Significant Downstream Emissions

The developer's own revised EIA confirms that combustion of the gas produced at Jackdaw will release around 20 million tonnes of CO2 equivalent, with a further 3.6 million tonnes from well-to-tank production emissions, taking total lifetime emissions to over 23 million tonnes, and as high as 35.8 million tonnes under a maximum production scenario. The revised EIA does not, in my view, adequately justify locking in emissions of this scale against a rapidly narrowing carbon budget.

3. High Raw CO2 Content and Unresolved Processing Emissions

Jackdaw is a high-pressure, high-temperature (HPHT) field whose raw gas has an unusually high CO2 content, of around 4.2%. This CO2 must be stripped out at the processing stage before the gas can enter the pipeline network, which is itself an energy-intensive process and is the source of the well-to-tank emissions referenced above. The developer's original plan was to route this stripped CO2 to a carbon capture and storage facility at St Fergus as part of the Acorn CCS project. That project's future remains genuinely uncertain: its lead commercial backer withdrew in December 2025, and as of early 2026 the government funding pledged to it had yet to materialise. Without an operational capture and storage route in place, there is no assurance that the CO2 removed from Jackdaw's gas will not simply be vented, adding a further, avoidable source of emissions on top of those already disclosed.

4. Overstated Job Creation

Industry and political figures have repeatedly cited large employment figures for this project, including claims of 3,500 jobs during construction and 880 sustained during production. However, the developer's own EIA states that of the roughly 500 jobs (direct, indirect and induced) associated with the Shearwater platform to which Jackdaw will be tied back, 273 are existing roles that already exist independently of this project, and only 27 are new full-time equivalent posts created specifically by Jackdaw. Much of the platform will be unstaffed for most of its operating life, and a substantial share of

construction has already taken place overseas. This does not support the scale of employment benefit being claimed in public debate, and should not be treated as a material justification for consent.

5. Clean Energy Alternatives

Continued investment in infrastructure that locks the UK into decades of fossil fuel reliance diverts economic resources away from the scaling of secure, low-carbon energy technologies, which represent a more durable long-term response to both energy security and climate obligations.

For these reasons, I believe that proceeding with the Jackdaw project presents an unacceptable risk to our climate security and lacks the robust environmental and economic justification required by law. I request that OPRED and the Secretary of State uphold the integrity of the UK's environmental frameworks and reject this application.

I am copying this objection to my MP [], for his awareness. I look forward to your acknowledgement of this submission.

J0140

I object to the proposed Jackdaw development.

It will shred the UK's international commitments on climate, legitimising similar projects around the world, blowing apart the Paris agreement and dooming us to a cataclysmic future.

The **IEA has said that there is no new oil and gas development** on a credible pathway to limiting global temperature rise to 1.5°C.

The arguments that the development will contribute to the UK's energy security and/or reduce prices are clearly wrong - fossil fuels are traded on the international market regardless of where they originate.

J0141

Reference number D/4260/2021

I wanted to share my personal view on the importance of continuing to make use of Britain’s domestic energy resources rather than increasing our reliance on imports.

As someone whose business is closely connected to the offshore energy sector, projects for Adura and specifically Jackdaw are particularly important to me. I have already been on Jackdaw twice and have seen first-hand the scale of investment, expertise and activity involved. I am also due to take a trip to Rosebank, again as part of our work with xxx.

In both cases, these are not just proposed developments; they represent real jobs, real opportunities and long-term commitments that are already benefiting communities and businesses. Including mine.

Jackdaw and Rosebank have both attracted substantial investment and are at an advanced stage of development. I believe they will support thousands of high-quality jobs, apprenticeships and supply chain businesses across Scotland and the UK.

I also believe that producing oil and gas in UK waters strengthens our energy security while generating tax revenues that help fund public services. In addition, domestic production has significantly lower associated emissions than importing equivalent LNG supplies from overseas.

For these reasons, I believe it is important that projects such as Jackdaw and Rosebank are given the opportunity

J0142

Dear Secretary of State for Energy Security and Net Zero,

I am writing to you as a concerned member of the public and as part of the public consultation D/4260/2021 relating to the decision to grant North Sea licences for the Jackdaw and Rosebank oil and gas fields.

I understand that you will be under a lot of pressure from the oil and gas industry and some within your own party who don't understand the gravity of the climate crisis and the dire situation we find ourselves in, but I implore you to hold firm and not grant these licences which will not be compatible with our climate commitments as a country under any rational reading and will have no appreciable benefit for ordinary people while tying us to the increasing cost of fossil fuels for longer.

Pursuing further oil and gas when we have record ocean temperatures; much more intense, frequent and long lasting wildfires and rolling heatwaves and when the scientists are quite clear that we must do everything we can to leave it in the ground will harm ordinary people both economically and as a result of the escalating effects of the climate crisis. The ethical decision in my view is to deny the fossil fuel industry's requests to enrich themselves further at the expense of ordinary people and to focus instead on transitioning us to clean energy as quickly as possible so that we can all enjoy the environmental benefits and health benefits from transitioning due to less

pollution, less global warming, cleaner air, water etc. and much cheaper costs that come from generating electricity and heating homes with clean energy.

Too many politicians don't seem to understand that most people want you to take serious action on the climate crisis commensurate with our legally binding Net Zero commitments and to work with and cooperate with other countries to achieve this globally. However, people don't necessarily view it as a priority or even come out opposing certain climate measures because they don't understand the immediacy of the crisis (although this is changing) and because they have been misled into believing it's too expensive when in reality it is relatively cheap and the cost of inaction is far higher. It's not because people don't want you to take the required action to deal with the crisis as the polls on this specific question make clear; it is a problem of narrative and of contradictory policy.

Granting these licences and at the same time saying we must transition to Net Zero because the climate crisis is a real threat is contradictory policy which weakens the need for action in the minds of the public and confuses us. The messaging and narrative battle is really important and ceding ground here will not win you any favours; in fact I believe it will shift policy in the direction of the fossil fuel industry and will validate the rightwing and their false narrative who will use it to demand further concessions.

I really admire the work of your predecessor and that he stuck to his guns on this and a lot else. In my opinion he was the best thing about your government and I remain hopeful that as his protege who must surely understand and empathise with my argument that you will decide to take option (b):

the Secretary of State refuses to agree to the OGA's grant of consent following the Secretary of State's conclusion regarding the environmental effects of the project, so the project may not proceed.

J0143

Dear Sir/Madam,

I am writing in support of the Jackdaw Field Development.

The UK's demand for natural gas has not disappeared and remains significant. Approximately 86% of UK homes are still heated by gas boilers, with around 29 million households across the UK continuing to rely on gas for heating and energy needs. The transition to alternative heating systems will take many years and, during this period, the UK will continue to require substantial supplies of natural gas.

If the UK does not produce sufficient domestic gas, it will increasingly rely on imports. Importing gas can increase the overall carbon footprint due to transportation and the additional emissions associated with liquefaction, shipping and regasification processes. It therefore seems sensible to prioritise domestic production where possible while the transition to lower-carbon technologies continues.

The Jackdaw development would also provide important economic benefits. It would support local jobs and supply chains, particularly in the North East of Scotland, where many communities continue to depend on the energy sector. The project would help sustain skilled employment and apprenticeships and support the wider regional economy.

In addition, domestic production allows employment taxes and corporation taxes associated with these activities to remain within the UK, generating revenue that can be used to support public services and invest in the country's energy transition.

I therefore urge the Department to give due consideration to the UK's ongoing reliance on natural gas, the economic importance of the energy sector to the North East of Scotland, and the benefits of maintaining secure domestic energy supplies during the transition to 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
OPRED@Energysecurity.gov.uk

RECEIVED 28/07/26

[redacted]

Reference: ES/2022/120

Dear Sir/Madam,

I write to you to express my strong support for both the Jackdaw and Rosebank projects which await consent in the UKCS.

These projects are of national significance, with Jackdaw in particular, if consented significantly reducing the UK dependence on imported LNG this winter (2026/2027). The carbon intensity of the oil and gas delivered from these projects is much lower than that of oil and gas imported to UK/EU from Middle East or USA or Africa, particularly when transit is taken into account.

As a worker in the oil and gas industry who also lives in Aberdeen, I have been hit hard by the rapid contraction in the size of the industry, with my Husband having been made redundant. I would also advise that he finally found work, but opportunities in the renewables industry were not available. Rosebank and Jackdaw provide at least for some directly employed and those in the supply chain the prospect of longer term employment with most positions being based in the North East of Scotland.

In summary I note that :

Both projects have low CO2 emissions intensity when compared against international projects.

Both projects will make a substantial positive contribution to UK balance of payments and foreign currency reserve position, versus the alternative of importing the equivalent volumes. I also note that if these projects are not consented the UK will have an ongoing requirement, but at a higher level to continue to import oil and gas. Without consent the UK economic position will only be weaker

Both projects help anchor ongoing economic activity in the north east of Scotland, helping slow down the economic decline apparent in the area.

Both projects are close to being complete, if not consented, the UK would face significant challenge and potential penalties for non consent.

Please record my strong support in favour of Rosebank and Jackdaw projects

Thank you

[redacted]

Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
Department for Energy Security and Net Zero
AB1 Building, Crimon Place
Aberdeen, AB10 1BJ
OPRED@Energysecurity.gov.uk

RECEIVED
28/07/26

[redacted]

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Thank you

[redacted]

Offshore Energies UK
[redacted]

[redacted]

Business Support Team
Offshore Petroleum Regulator for Environment and Decommissioning
Department for Energy Security and Net Zero
[redacted]

Jackdaw

Executive Summary

We are writing to urge a positive and timely decision on the Jackdaw development considering the critical role it would play in meeting UK gas demand and enhancing energy security.

Jackdaw is a strategically important project that would strengthen security of supply, sustain critical offshore and onshore infrastructure, and deliver substantial economic value across the country. At peak production, the field could provide around 6.5% of UK Continental Shelf gas supply, equivalent to the annual gas demand of approximately 1.4 million homes. The project is expected to generate more than £4.4 billion of Gross Value Added over its lifetime, deliver a peak annual GVA of more than £825 million, support over 1,000 direct and indirect jobs, and utilise over 100 UK supply chain companies.

These benefits come at a time when domestic gas production is declining, and import dependence is growing. UK production met only 39% of UK gas demand in 2024, while imported LNG accounted for 15% of supply. Without new investment, the UK's reliance on imported gas will continue to increase. This matters because UK gas demand is expected to remain broadly unchanged over the next decade. NESO forecasts demand of 53.6 bcm in 2026 and 53.3 bcm in 2035, underlining the continuing need for reliable domestic sources of supply.[1]

The strategic importance of Jackdaw extends beyond the gas it will produce. The development is critical to the future of the Shearwater hub, one of the UK's most important offshore gas processing assets. By tying into existing infrastructure, Jackdaw extends the life of the hub and provides a vital source of

[1] OEUK/Westwood: UK Produced Gas and its role in energy security: https://oeuk.org.uk/product/uk-produced-gas-and-its-role-in-future-security-of-supply/

throughput. This helps maintain nationally important energy infrastructure, protect skilled jobs, and preserve the resilience of the wider offshore energy system.

The UK's gas network depends on reliable domestic throughput to keep key pipelines, terminals and processing facilities operating efficiently. When domestic production declines faster than demand, infrastructure comes under increasing pressure and reliance shifts towards imported supplies. Jackdaw helps sustain the flow of gas through existing infrastructure, supporting a more resilient and balanced energy system while reducing exposure to the risks associated with growing import dependence.

Jackdaw would also help retain the industrial capability needed to deliver the UK's wider energy ambitions. The companies, facilities and specialist skills supported by the project are critical to the development of offshore wind, hydrogen and carbon capture and storage. The project would also provide a comparatively low emissions source of supply. Jackdaw's estimated overall emissions intensity is 18.5 $kgCO_2e$/boe, significantly below the UK average of 28 $kgCO_2e$/boe, while replacing its production with imported LNG could lead to approximately 4 million tonnes of additional CO_2e emissions over the life of the field.

Decisions following the conclusion of the regulatory process on both Jackdaw and Rosebank are critical barometers of investment sentiment across the offshore energy sector. For investors, the outcome of these projects will indicate whether the UK can provide the predictable, transparent, and investable regulatory environment required for long term energy investment. The significance of these decisions therefore extends far beyond the projects themselves. After a prolonged period of regulatory and policy uncertainty, confidence across the basin is increasingly tied to the UK's ability to reach timely decisions and allow projects to progress once regulatory requirements have been met. A timely approval would help unlock investment across a broader pipeline of developments, infrastructure projects, and supply chain activity, while reinforcing confidence in the UK's commitment to domestic oil and gas production, infrastructure resilience, and economic growth. Conversely, continued uncertainty risks delaying investment, weakening industrial capability, and increasing dependence on imported energy.

A Critical Source of Domestic Gas Supply

As OEUK set out in the response to the Gas Security of Supply Consultation[2], gas will remain a critical component of the UK energy system for decades to come. In 2024, gas provided 36% of the UK's energy needs. Even as electrification accelerates, gas is needed to provide essential flexible power to back up and balance the grid. According to the average gas demand scenarios from NESO, gas is expected to provide 30% of total energy needs for the UK in the period 2025 to 2050, and gas is still expected to provide 20% of the UK's energy needs in 2050[3].

Therefore, the question is not whether the UK continues to need gas. The question is whether more of that demand is met from domestic production or from imports.

Jackdaw could contribute approximately 6.5% of UK Continental Shelf gas production at peak output, equivalent to the annual gas demand of around 1.4 million homes.

[2] OEUK Gas Security of Supply Consultation Response: https://oeuk.org.uk/wp-content/uploads/2026/03/OEUK_Gas_Security_of_Supply_Consultation_Submission.pdf
[3] NESO Future Energy Scenarios 2025: https://www.neso.energy/document/364551/download

This contribution comes at a time when production is declining faster than it should. Without developments such as Jackdaw, a growing proportion of UK demand will need to be met through imported gas and LNG, increasing exposure to international market volatility and geopolitical risk.

Domestic production should complement imports, not be displaced by them. Producing gas at home supports security of supply, resilience and economic value in a way imported energy cannot.

Protecting Critical National Infrastructure

Jackdaw's significance extends well beyond the volumes of gas it will produce. The project will be developed as a subsea tie back to the Shearwater hub, one of the UK's most important offshore gas processing and export facilities**.** By bringing new production into existing infrastructure, Jackdaw helps extend the operational life of the hub and maintain the wider infrastructure network connected to it.

This matters because offshore infrastructure operates as an interconnected system. Processing facilities, pipelines, and export routes depend on sufficient throughput to remain viable. Once infrastructure is lost, it is often difficult and costly to replace.

Jackdaw provides the throughput needed to keep Shearwater operating for longer. In doing so, it creates a bridge between mature assets and future production opportunities, helping preserve infrastructure that remains strategically important to the UK's offshore energy system.

Economic Value and Growth

Jackdaw represents a substantial investment in the UK economy that cannot be replicated through imports. The project is expected to generate more than £4.4 billion of Gross Value Added over its lifetime and deliver a peak annual GVA of more than £825 million.

This value is created through investment in engineering, fabrication, manufacturing, logistics, offshore services, and specialist supply chain activity.

The project is already supporting 117 UK based supply chain companies across Scotland, England, Wales, and the Isle of Man, demonstrating the breadth of economic activity sustained by domestic production.

At a time when long term infrastructure resilience and industrial capability are increasingly important, Jackdaw would help sustain both.

Jobs and Skills

Jackdaw has already supported more than 1,000 direct and indirect jobs onshore and offshore and would continue to provide high-quality employment throughout its operational life. The project is also helping build the next generation workforce. There are currently 73 apprentices employed through contractor companies working on Jackdaw. Approximately 35 apprentices have completed their trade certification during the project and around 20 skilled workers have gained a second trade qualification.

These roles help retain the specialist expertise needed to operate and maintain the infrastructure on which the UK offshore energy system depends.

The wider importance of this workforce should not be underestimated. The same companies, fabrication yards, vessels, and technical specialists supporting Jackdaw are increasingly involved in offshore wind,

hydrogen, and carbon capture projects. Maintaining those capabilities today is critical to avoid relying on imports of equipment and wider supply chains needed for the transition.

Tax Revenues

Projects such as Jackdaw create value that is retained within the UK economy and contributes directly to the public finances.

Rosebank and Jackdaw together are expected to generate around £1.4 billion in tax revenues before the end of this Parliament and approximately £3.8 billion by 2034. These figures demonstrate the significant fiscal contribution that domestic production can make to the UK economy.

Domestic production ensures that a greater share of the value created from meeting UK demand remains within the UK economy and supports the Exchequer. The issue is therefore wider than energy supply alone; it is also about where economic value, fiscal revenues and industrial activity are retained.

Lower Emissions

Jackdaw would provide a comparatively low emissions source of domestic gas production. The project's estimated upstream operational emissions intensity is 8.5 $kgCO_2e$/boe, compared with a UK average of 18 $kgCO_2e$/boe. Including transportation and processing emissions, Jackdaw's overall emissions intensity is estimated at 18.5 $kgCO_2e$/boe, significantly below the UK average of 28 $kgCO_2e$/boe. The alternative to Jackdaw is not the removal of gas demand but an increased reliance on imported LNG.

Analysis undertaken for the project indicates that replacing Jackdaw's expected production with LNG imports could result in approximately 4 million tonnes of additional CO_2e emissions over the life of the field. The assessment concludes that imported LNG could generate around 20% more emissions than producing the same gas domestically.

Meeting continued demand through lower emissions domestic production is therefore a more environmentally responsible option than increasing reliance on higher emissions imports.

Restoring Confidence and Unblocking Investment

Jackdaw is important not only for the benefits it would deliver directly, but also for what its approval would say about the UK's ability to progress major energy developments through the regulatory system.

The project has been subject to extensive scrutiny and assessment. A timely decision would show that the regulatory framework can reach clear and predictable outcomes once requirements have been met. It would also enable Jackdaw to begin supplying domestically produced gas to UK homes and businesses this winter, reducing reliance on imports and strengthening energy security.

This is particularly important given Jackdaw's role in supporting critical offshore infrastructure. Delays to projects that provide future throughput can have wider consequences for the infrastructure networks on which domestic energy production depends. Certainty over projects such as Jackdaw supports long term planning, infrastructure utilisation, and the efficient operation of the wider offshore energy system.

More broadly, approval would reinforce confidence in the UK's long-term approach to domestic energy production. It would show that the UK remains committed to maintaining the infrastructure, industrial

capability and investment needed to support energy security through the transition, helping unlock the wider pipeline of projects required to sustain the offshore energy sector in the years ahead.

J0147

As I retired executive of a large international engineering company I write to support the Jackdaw project.

I fully support the transition to renewables but that must be done in a manner that does not expose our economy to unnecessary risk. This project can support high quality jobs and fully support a world class supply chain across the whole of the UK. Not only does that mean we retain and grow our knowledge and experience it also delivers much needed tax revenues that not only supports public services but makes a massive contribution to growing our economy.

We live in difficult and strange times and energy security is becoming more important by the day. Increasing our domestic production massively improves the energy security issues but also removes the requirement to be so dependent on importing. The government has acknowledged that we will be reliant on oi and gas until the 2050's and it makes sense to use our own reserves rather than importing resource from across the globe.

Utilising our own reserves also reduces our carbon footprint with a significant reduction in associated emissions over importing resource from overseas. This is especially true of LNG where significant energy is required to liquefy the gas and huge amounts of diesel burned to transport the liquid to this country.

Finally given the status of this project and the substantial investment that has been made in getting it to this point it would be crazy not to support it.

Thank you for the opportunity to voice my support for the project.

J0147

Dear Business Support Team, Offshore Petroleum Regulator for Environment and Decommissioning,

I would like to make the following representation with regard to further development of the Rosebank and Jackdaw oil fields.

According to [] and colleagues at the University of Manchester in a recent open letter to the prime minister, the scientific evidence has only strengthened since the UK's legally-binding Paris Agreement commitments were made. Global temperatures have already risen to the lower limit of the Paris Agreement's temperature range (1.5°C). Extreme weather events are becoming increasingly evident across the UK, most vividly the widespread wildfires driving air quality to unsafe levels in Greater Manchester and

Scotland as well as France and Spain. Meanwhile, the remaining global carbon budgets – our headroom for action – continue to shrink rapidly. The science makes clear that if governments are to respect even the weaker 2°C interpretation of the Paris Agreement, global carbon dioxide emissions now need to fall by almost 8% every year, starting immediately. Against that backdrop, approving the further development of oil and gas fields cannot be reconciled with the UK's repeated commitment to honour its international climate obligations.

Some argue that permitting Rosebank and Jackdaw would not technically breach Labour's previous commitment to stop issuing new oil and gas licences. Such legal or procedural distinctions may have political relevance, but they are immaterial to the physics of climate change. The climate system responds to the cumulative quantity of greenhouse gases released into the atmosphere. If these developments proceed, they will ultimately result in the release of hundreds of millions of tonnes of additional carbon dioxide, further reducing the already vanishing space for climate action.

Equally important is the signal such a decision would send. For many years the UK has presented itself as a nation that honours its international commitments and expects others to do likewise. Approving major new fossil fuel developments would instead signal that our commitments under the Paris Agreement, the United Nations Framework Convention on Climate Change and, more recently, the principles reaffirmed by the International Court of Justice, are becoming conditional when confronted by short-term political pressures. It would suggest that, on climate change, the UK is prepared to step back from obligations it has repeatedly urged other nations to uphold.

The economic arguments in favour of expanding North Sea oil and gas fields are equally short-sighted. Oil and gas jobs in the North Sea have been steadily declining for over a decade, while the UK's growing green economy is worth £100 billion/ year, generating jobs with higher than average wages. "Homegrown" oil and gas will do nothing to lower families' bills or increase energy security, while investment in and support for renewable energy can and will do both. Meanwhile, causing further damage to the environment will cost the country more in terms of necessary adaptations and mitigations in the future.

The role of government is to protect the health and safety of its citizens, carefully considering the evidence to choose the best overall course of action. It is clear that allowing the further development of the Jackdaw and Rosebank oil fields is not in the interests of the citizens of the UK and so approval should be refused.

J0148

Dear Business Support Team, Offshore Petroleum Regulator for Environment and Decommissioning,

I would like to make the following representation with regard to further development of the Rosebank and Jackdaw oil fields.

According to [] and colleagues at the University of Manchester in a recent open letter to the prime minister, the scientific evidence has only strengthened since the UK's legally-binding Paris Agreement commitments were made. Global temperatures have already risen to the lower limit of the Paris Agreement's temperature range (1.5°C). Extreme weather events are becoming increasingly evident across the UK, most vividly the widespread wildfires driving air quality to unsafe levels in Greater Manchester and Scotland as well as France and Spain. Meanwhile, the remaining global carbon budgets – our headroom for action – continue to shrink rapidly. The science makes clear that if governments are to respect even the weaker 2°C interpretation of the Paris Agreement, global carbon dioxide emissions now need to fall by almost 8% every year, starting immediately. Against that backdrop, approving the further development of oil and gas fields cannot be reconciled with the UK's repeated commitment to honour its international climate obligations.

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The role of government is to protect the health and safety of its citizens, carefully considering the evidence to choose the best overall course of action. It is clear that allowing the further development of the Jackdaw and Rosebank oil fields is not in the interests of the citizens of the UK and so approval should be refused.

J0149

Ref ES/2022/001 Rosebank and Jackdaw Field Development

In my early training to be a decision-making member of a planning committee, I was shown a picture of a set of scales. Potential benefits on one side, potential harms on the other. Weighing the overall balance informed the decision, after considering possible planning conditions to re-balance the negative effects.

I recognise and understand the arguments in favour of developing the Rosebank and Jackdaw oil and gas fields, but find the weight of the positives being routinely misrepresented and the negatives piling up dramatically. I now have 20 years of closely observing and working to mitigate the effects of floods, which through man-made global warming, also encompass ever more powerful storms, droughts and wildfires, along with nature depletion.

No ‘conditions’ can mitigate the release of more carbon and methane into the atmosphere from exploiting and burning ever more fossil fuels, as it’s just a reality, as is the massive financial, social and human cost of climate breakdown that’s already with us. Rather than an uncertain future value from prevention, that’s now a hard currency figure on a balance sheet. Watch the daily news right now and see that figure increase dramatically by the day. Today the price of wildfires, tomorrow back to floods again. Sadly, our local Ryedale and Yorkshire moors and forests are likewise on high alert and not immune from human negligence and profiteering.

Returning to the planning analogy, the economic pillar invariably informs decisions, rather than being balanced with the social and environmental as it should. Therefore, account must be taken of the huge sums (whether public or private) that may be invested in Rosebank and Jackdaw, that could otherwise be invested in decarbonised renewable energy, consequently moving the cash from the positive side to the negative. The financial costs must now also include those of dealing with extreme heat, wildfires and floods, alongside the medical and social costs of their impacts.

Speaking as someone who has spent 6 years of voluntary effort moving forward to deliver a geothermal pilot project in Pickering, it’s remarkable that we have to battle for

every penny of feasibility and capital funding to prove a concept that has already been proven elsewhere. It has massive potential to deliver gas replacement, decarbonisation, genuine energy security, reduced costs and protection from geopolitical price volatility within the short to medium timescale. This could be rolled out nationally while Rosebank and Jackdaw are still being developed at great expense – no doubt largely at public expense. For more information on the genuine alternatives to ever more damaging carbon and methane emissions, you only need to ask.

The scales are tipping dramatically and expensively by the day... visible on each news report.

J0150

To Whoever It May Concern

I would like to log my opposition to the Jackdaw and Rosebed oil and gas fields being given consent in the upcoming consultations. It will lock the UK in to decades of hydrocarbons, against the net zero pledges of government. It is especially prescient in 2026, when many people will look back as the moment climate breakdown could no longer be ignored.

J0151

For the attention of the Secretary of State

Continuing to import increasing volumes of oil and gas while leaving Britain's own resources undeveloped makes little economic or strategic sense.

The UK should make full use of its domestic energy resources before becoming more dependent on imports from overseas. Developing fields such as Jackdaw and Rosebank strengthens energy security, reduces exposure to international supply shocks and keeps investment, jobs and expertise here in the UK.

These projects have already attracted billions of pounds of private investment and are well advanced. They will support thousands of highly skilled jobs, apprenticeships and businesses throughout the supply chain across Scotland and the wider UK.

Producing oil and gas from UK waters also has lower production-related emissions than importing equivalent LNG from overseas, which requires energy-intensive liquefaction and transportation. If the UK continues to need oil and gas during the transition to net zero, it is more sensible to produce as much as possible domestically rather than outsourcing production and importing it from countries with higher transport emissions and less direct benefit to the UK economy.

Developing Britain's own resources is a practical approach that enhances energy security, supports employment, generates tax revenues for public services and makes better use of existing infrastructure. If the demand for oil and gas remains, choosing to import it instead of producing it responsibly at home is difficult to justify. Opening up & developing more fields thereafter makes total sense.

J0152

Dear Secretary of State

I write to make representations about Jackdaw and Rosebank oil and gas projects applications.

I am a retired police officer. My whole career has involved the assessment of risk to life and this is how I approach the issue of North Sea drilling.

1. Scientists for over a decade now have provided conclusive evidence that an immediate and steep transition to renewable energy is required to stay within 1.5C. We have failed - which means the transition required must be faster and steeper to limit warming as much as possible.

2. Any delay in transition will result in higher global average temperature, more extreme weather, more food/water insecurity and therefore more suffering and more lives lost - more life lost.

3. Similarly to 2, a delay in transition will result in higher global average temperature, more extreme weather, more climate damage and a greater economic hit.

4. **A faster transistion will reduce suffering, save lives, save money and create jobs.**

5. Drilling in the North Sea will fly in the face of scientific consensus, creating significant physical harm in the real world without increasing energy security or creating revenue of any significance.

6. Drilling in the North Sea will send the wrong message to other nations and ecourage other governments to follow suit. The UK is number 2 (just below Netherlands) in the global ranking of historic per capita carbon emissions, above US and China. It is our moral and legal responsibility to lead the way.

There will be a few thousand oil employees who will need support to transition to the thriving renewable energy sector. Given that fossil fuels are a limited resource, soon to expire and the oil companies have known about the consequences of burning their products for 75 years, it makes no sense whatsover to continue propping up this deadly polluting industry that received over $7Trillion in subsidies last year!

Please do the right thing and reject the Rosebank and Jackdaw applications to drill for new oil and gas.

J0153

Dear Secretary of State

This is a response to the public consultation regarding the Rosebank and Jackdaw oil fields - reference ES/2022/001.

It is absolutely absurd that you are considering approving drilling at the Rosebank and Jackdaw oil fields. We are in a climate crisis, and the world is literally on fire, and we know a big contributing factor to that is the use of fossil fuels. As a parent of two young children, I feel so saddened and angry that you are considering worsening our children's futures to - once again - create a profit for oil and gas companies. They have already helped to create a world which is likely to be unliveable for our children just for money and power, and the government should be doing everything in their power to fight against these companies and properly invest in renewable and sustainable solutions.

We know that these oil fields would not positively impact the UK population due to most of the oil being sold on the open market, and they would not lower energy bills. Also, investing in renewables would create more jobs than these fields. Therefore, I am not sure why lies continue to be fed to the public.

As [] has previously said, Rosebank would be "climate vandalism" and "the evidence is clear: Rosebank would do nothing to cut bills, is no solution to our energy security, and would drive a coach and horses through our climate commitments".

Surely you would do anything you can to secure a liveable future for your children, as well as the rest of the country.

J0154

Dear Sir/Madam,

The proposed development of Rosebank and Jackdaw is a shocking idea, given that the UK is in drought because of the burning of oil and gas.

We face a truly bleak future of mega fires, mega floods, food shortages and drought.

in the name of sanity and humanity, stop the madness.

J0155

I am writing to object to the authorisation of Rosebank and Jackdaw oil fields. Opening them would go diametrically opposite the needs of the UK government to hit zero

carbon by 2030, and would be very bad for the economy. We need to transfer to sustainable energy, not worsen the climate crisis.
Energy Security will only come when we produce our own sustainable energy and not buy and sell oil on the international market.
I look forward to hearing a good conclusion.
Thank you in advance,

J0156

Dear OPRED Decision-Making Team,

I am writing to oppose development consent for the Jackdaw field and to request that this representation be placed before the Secretary of State.

The developer's assessment identifies approximately 23.6 million tonnes of lifecycle Scope 3 emissions under its likely production case, rising to approximately 35.8 million tonnes under its maximum case. Around 85 per cent would arise from the eventual use of the produced gas and condensate.

The developer nevertheless classifies the climate effect as "minor adverse" and insignificant. That conclusion depends heavily upon comparing Jackdaw with total global emissions, national emissions and economy-wide transition pathways. Those comparisons dilute every individual project against an enormous baseline. They cannot establish whether Jackdaw would cause significant additional emissions.

OPRED's further-information questions correctly recognised this problem. Comparing one project with global emissions will almost invariably produce a small percentage, regardless of whether the cumulative consequences are substantial.

The final decision should therefore explain:

1. OPRED should state whether it accepts the developer's significance methodology and provide its reasons.
2. OPRED should explain how an admitted contribution of up to 35.8 million tonnes can reasonably be classified as environmentally insignificant.
3. OPRED should publish its assessment of Jackdaw alongside other producing, approved and licensed-but-undeveloped fields.
4. OPRED should explain how cumulative emissions were assessed without treating every field as an isolated and individually small project.

The substitution argument also requires much stronger evidence. Jackdaw gas may have lower upstream emissions than imported liquefied natural gas, but this comparison does not establish that every unit of Jackdaw production would displace an

equivalent unit of imported LNG. Additional domestic supply could also affect prices, consumption, storage, exports or production elsewhere.

The Supreme Court's Finch judgment rejected the assumption that leaving oil undeveloped would simply produce corresponding extraction elsewhere. The judgment recorded evidence that leaving one barrel undeveloped could reduce long-term global consumption by between 0.2 and 0.6 barrels.

If OPRED accepts a displacement argument for Jackdaw, its decision should disclose:

1. The expected volume of imported LNG that Jackdaw would actually displace during each production year should be published.
2. The assumed displacement ratio, market elasticities and price effects should be identified clearly.
3. Sensitivity testing should cover partial displacement, additional demand and displacement of other UK Continental Shelf production.
4. The analysis should explain how the assumptions remain compatible with the reasoning recorded in Finch.

The developer also relies upon the fact that future UK carbon pathways retain some demand for gas. The existence of residual demand does not demonstrate that this particular additional source is required. Carbon budgets describe an economy-wide limit. They do not allocate an automatic entitlement to each proposed field whose output could fit somewhere within projected demand.

Jackdaw also raises a wider policy question. If every field covered by an existing licence can proceed because some residual demand remains, the Government's policy against new exploration licences loses much of its practical effect. Each consent creates infrastructure, sunk costs and political pressure supporting further production.

OPRED should therefore identify the limiting principle governing these decisions. It should state how many other licensed-but-undeveloped fields currently satisfy the same proposed test. Without that information, Jackdaw cannot credibly be presented as an exceptional decision.

The developer cites approximately £1 billion of investment and substantial project completion. The Court of Session's 2025 judgment found that the developers continued while the legal position remained unsettled and therefore accepted the associated commercial risk. Expenditure incurred before a lawful assessment cannot determine the environmental significance of the resulting emissions.

The employment evidence also requires careful separation. The developer's figures include hundreds of existing Shearwater positions, while approximately 27 full-time equivalent roles appear to be newly attributable to Jackdaw. Any decision relying upon

employment benefits should distinguish existing, temporary and genuinely additional long-term positions.

I request that development consent should be refused. If consent is nevertheless granted, the decision should provide a reasoned response to every issue above and publish the underlying displacement, cumulative-emissions and carbon-budget analysis.

Please acknowledge receipt and confirm that this representation will form part of the statutory decision record.

J0157

I'm writing to convey my support of this project.

The City of Aberdeen is in a severe state of depression with thousands of jobs being lost to overseas. We have an abundance of untapped resource in our coastal waters and should be extracting oil and gas to contribute towards our national demand. From both an environmental and fiscal perspective this makes utter sense, not to mention from a local economy point of view. Unless the government change their stance on the North Sea, Aberdeen will fizzle out and there will be no skill base left to service the transition to green energy. Why would we do that??

This "argument" has become too political and it's high time common sense prevails.

We all support renewables and need to try and work towards net zero, but this should not be done in isolation while ignoring economic realities and destroying a region and livelihoods.

Let industry work together with the Government and utilise our resources rather than pretending imports are better for the environment.

In addition let's also stop pretending domestic gas supply isn't cheaper than importing liquified gas by hiding behind a global pricing system which doesn't take account of transportation and the costs incurred in liquifying and deliquifying.

More jobs, smaller carbon footprint, bigger tax receipts. At a time when the country is on it's knees we should face up to reality and change our stance on the North Sea.

J0158

To the Business Support Team, OPRED

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001, made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of xxxxx, an Aberdeen-based business specialising in trading house, procurement and supply chain services for the energy, oil and gas, refining, shipping and renewables sectors. xxxx has a long-standing presence in the UK North Sea supply chain and supports operators and major contractors through outsourced procurement, supplier management, expediting, e-procurement solutions and the sourcing of materials, equipment and services required to keep energy operations moving safely and efficiently.

Our interest in these projects is commercial and practical. As a procurement and supply chain partner to energy clients, xxxx work is directly linked to continued activity across the UK Continental Shelf. Projects such as Jackdaw and Rosebank create demand not only for major contractors, but also for the wider network of specialist suppliers, logistics providers, service companies and support functions that sit behind safe and reliable offshore delivery.

Our planning depends on clear and timely decisions. Consent for these developments would support confidence in the order book, enable supply chain businesses to plan resources and investment more effectively, and help sustain the skills, employment and capability that have been built up across Aberdeen, the Northeast of Scotland and the wider UK energy supply chain. Continued uncertainty makes it more difficult for companies such as ours to forecast workload, maintain capacity, recruit and retain skilled people, and make sensible commercial decisions for the future.

We also believe these developments are important to the UK's energy security. While the transition to lower-carbon energy is essential, the UK will continue to require reliable domestic oil and gas supply during that transition. Supporting responsible production from established UK Continental Shelf projects helps reduce reliance on imported energy, supports resilience against international supply disruption, and ensures that the economic, employment and supply chain benefits of production are retained within the UK wherever possible.

These projects support a large supply chain of businesses like ours across the UK, and the jobs, apprenticeships, skills, and local economic activity within it. On the basis of what they mean for our business, our employees and the wider supply chain that Craig International supports, we support the granting of consent.

I would ask that the Secretary of State takes account of representations from the businesses and workforces affected and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

J0159

[redacted]

To the Business Support Team, OPRED
30th July 2026

Dear Sirs,

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020. As a business in the supply chain, I write in support of consent for these projects.

We are a small independent company of 13 employees based in Aberdeen, with a 35-year history of supporting the UK Continental Shelf. We are the only company that is recognised by the helicopter companies and by the UK Civil Aviation Authority to certify offshore helidecks, whether they are on fixed platforms, mobile assets, or vessels. We certify around 250 helidecks per annum of which circa 15% are windfarm assets.
We have already been involved with the Jackdaw and Rosebank helidecks and at a time when we see decommissioning diminish our market, it has been refreshing to see new developments being proposed. In relative terms, we have made significant investment in developing a digital solution to support the work we do. Our shareholders have been very supportive, and it has been based on the UKCS prospering for many years to come.

Should the high-profile Jackdaw and Rosebank developments not go ahead, the signal that this sends out would mean that any future investment is likely to be curtailed. Ironically, this would also impact on our ability to support the windfarm assets. Ongoing delays in granting approval for the development of these fields also impacts our workforce who see firsthand the number of fields being decommissioned, and curtailment of the Jackdaw and Rosebank developments would cause negativity and may well result in several looking at alternative fields of employment.

We therefore support the granting of consent, and I would ask that the Secretary of State takes account of representations from the businesses and workforces affected and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

Yours faithfully,

[redacted]

[redacted]

[redacted]

J0160

To the Business Support Team, OPRED

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of Interwell Limited, a company operating from 2 Links Place, Aberdeen, where we employ 77 people. Interwell is a well technology company, supplying products and services spanning the full well life cycle from drilling & well construction to production and abandonment. Our interest in these projects is both commercial and personal. We hold a direct contract with Adura for supply of Well related equipment & services and indirectly via another Tier 1 contractor supporting these projects. They represent a significant portion of planned work scope and activity in the coming years, of which our local workforce will directly provide technical support, engineering, and services from our workshop facilities.

Our planning depends on a clear and timely decision. Approvals will allow us to plan for the future, invest in training, facilities, and apprenticeships to support this activity. Uncertainty on these projects limits investment and impacts the local communities in Aberdeen city and shire where our people and their families live. Activity in the wider basin sustains the specialist engineering, manufacturing and offshore skills base that companies like ours maintain in the Northeast of Scotland. When new development stalls, that capability does not wait for a decision; it is redeployed to other regions and is slow and expensive to rebuild. Consent decisions therefore shape our ability to invest in the people and technology that underpin both.

On the basis of what these projects mean for our business, our employees and the wider supply chain, we support the granting of consent to both.

I would ask that the Secretary of State takes account of representations from the businesses and workforces affected and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

Yours faithfully,

J0161

Dear OPRED,

I am submitting this representation in response to the consultation on the further environmental information relating to the Jackdaw Field Development.

Primarily because the entire planet is literally on fire.

Every week seems to bring news of another wildfire, another heatwave, another flood, another "once-in-a-century" weather event that is somehow happening every few years. It was 15 degrees Celsius in Antarctica in June. Which is meant to be the southern hemisphere's winter! Scientists have warned us for *decades* that burning fossil fuels is warming the planet, and I don't know if there has ever been such overwhelming scientific consensus on any issue as there is on this one.

Every tonne (gram??) of carbon we do not extract and burn is better than the alternative.

I am a woman in my thirties who is seriously considering never having children because I am frightened about the world they would inherit. I think about climate change almost every day. I think about ecosystems collapsing, species disappearing, harvests failing, homes becoming uninsurable and summers becoming increasingly dangerous. I struggle to understand how, with all that we now know, we are still considering approving new fossil fuel developments.

I appreciate that this is an emotional response. I also appreciate that OPRED's role is to apply the law, not simply to respond to public feeling. But I hope the people reading these representations are not immune to the reality that sits behind them. Behind every Environmental Statement, every emissions calculation and every regulatory process is a planet that is already changing in ways that are impacting millions of people.

I do not think it is unreasonable to ask whether approving new oil and gas developments is compatible with the reality we can all see unfolding. Climate change is no longer something our great grandchildren may have to content with. It is here. Now.

With that in mind, I would also like to raise the following concerns regarding the environmental assessment.

First, while I welcome the inclusion of a Scope 3 emissions assessment, I am not satisfied that the further information adequately demonstrates the significance of the downstream greenhouse gas emissions associated with the combustion of the gas produced by the project. Following the legal developments that led to the reconsideration of this project, it is essential that these emissions are not treated as a peripheral issue but are fully integrated into the assessment of the project's environmental effects.

Secondly, I ask the Secretary of State to consider whether the assessment sufficiently explains how these additional emissions have been weighed alongside the UK's legally binding climate obligations and carbon budgets. An assessment that merely quantifies emissions, without fully evaluating their environmental significance or explaining how they inform the decision-making process, would not enable an informed and lawful decision.

Thirdly, I remain concerned that the cumulative effects assessment may not adequately consider the combined climate impacts of this project together with other existing, approved and reasonably foreseeable offshore oil and gas developments. The purpose of environmental impact assessment is to evaluate the project's effects in context, rather than in isolation.

Fourthly, I ask OPRED to consider carefully whether the assessment of alternatives is sufficiently detailed. The Regulations require reasonable alternatives and their environmental effects to be described. The consultation documents should enable both the public and the decision-maker to understand whether realistic alternatives that could reduce environmental harm have been properly examined and, if not, why they were rejected.

Finally, where there remains uncertainty regarding the scale or significance of the project's climate impacts, I ask that the precautionary approach be applied. Environmental consent should not be granted unless the Secretary of State is satisfied that all likely significant environmental effects have been fully assessed using robust evidence and that any remaining uncertainties have been appropriately addressed.

The Court of Session previously determined that the earlier consent process was unlawful because the environmental assessment failed to consider the emissions resulting from the eventual combustion of the gas produced. In considering this renewed application, I respectfully request that OPRED and the Secretary of State ensure that the deficiencies identified by the courts have been fully remedied rather than simply supplemented.

For these reasons, I respectfully request that environmental consent should not be granted unless and until the Secretary of State is satisfied that the Environmental Impact Assessment complies fully with the requirements of the 2020 Regulations and provides a complete and legally adequate assessment of the project's likely significant environmental effects.

Thank you for considering my representation.

J0162

To the Business Support Team of the Offshore Petroleum Regulator for Environment and Decommissioning Department for Energy Security and Net Zero,

I am writing to register my strong objection to development and drilling of the Jackdaw oil field (Reference number D/4260/2021) in the North Sea. The drilling of both Rosebank and Jackdaw oil fields are fundamentally incompatible with both the UK's commitment to the Paris Agreement, and to a liveable future on this planet.

Jackdaw is owned by Adura (a joint enterprise between Shell and Equinor) and the vast majority of what it yields is destined to be sold on the international market. Claims that it will improve UK energy security are absolute nonsense. Drilling in the North Sea will do absolutely nothing to support British infrastructure. It will only serve to further enrich planet-killing enterprises, and pour millions of tonnes of CO2 into the already choked atmosphere.

Adura has repeatedly made claims that drilling in the North Sea would provide jobs for British workers. However, Greenpeace recently uncovered that the Jackdaw project would provide just 27 jobs (as stated in the project's own development report) and that the platform for drilling Jackdaw will be unstaffed for most of its operating life. This was reported in the Guardian in mid-July, 2026. Pouring poison into the atmosphere does not serve the British public, or the planet at large. In fact, it further endangers national security by increasing the likelihood of extreme weather events, resulting in catastrophic global crop failures, resource scarcity, and internal unrest. Increasingly unpredictable climate events are also likely to displace many people across the globe, which will put further strain on land that is still (at least for now) habitable by humans.

According to Uplift, industry claims of tax revenues on the projects are vastly outweighed by the extremely high tax reliefs offered on these developments. The British public is unlikely to see any significant economic returns on either the Jackdaw or the Rosebank oil fields. The profits these companies make from the Jackdaw oil field will be directly at the expense of human beings across the globe, who will suffer in life-threatening temperatures and catastrophic weather events as a direct result of Adura's activity.

It is astonishing that the UK government are considering approving both Rosebank and Jackdaw oil fields during a year of record heat, with wildfires sweeping Europe and North America, and several burning through the UK, too. This year, 2700 people are estimated to have died from heat related complications in the UK May and June alone, and the temperature is only set to increase in coming years. It concerns me deeply that, despite the worsening climate emergency, the total irrelevance of the oil fields to British energy security, the existential threat the oil fields present to national security, and the appalling behaviour of the companies aiming to develop these oil fields, that the

government would even consider approving them. I, along with many others, am losing faith that our leaders have our best interests at heart, or that they are representing the interests of those who elected them.

I object, in the strongest possible terms, to the development of the Jackdaw oil field and urge the government to deny approval for this development, and to end this absurdity once and for all. The British public want a secure future, a transition to green energy, and a government willing to tackle the climate emergency now. Please do not approve drilling in the Jackdaw oil field.

Regards,

J0163

Correspondence relating to the Jackdaw and Rosebank Field Developments (References D/4260/2021 and ES/2022/001)

Please see the below letter from [], President and CEO of CHC Helicopters

To the Business Support Team, OPRED,

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of CHC Helicopter, a major provider of offshore helicopter transportation services supporting the energy industry in the United Kingdom. Our business provides critical aviation services that enable safe movement of personnel to and from offshore installations across the UK Continental Shelf.

CHC has supported North Sea operators and the wider offshore energy sector for many decades. Projects such as Jackdaw and Rosebank are important not only in their own right, but because they help sustain a broad ecosystem of companies, workers, skills and infrastructure across the UK supply chain. Our ability to invest, retain highly skilled personnel, and plan for future operations is strengthened by a stable pipeline of offshore activity.

The prolonged uncertainty surrounding these developments has made long-term planning more difficult for businesses across the sector. A timely decision that allows both projects to proceed would provide greater confidence for our industry, support continued investment in specialist aviation capabilities, and help sustain highly skilled employment in the communities that support offshore energy operations.

In addition, the benefits of Jackdaw and Rosebank extend well beyond the project operators themselves. Together, the projects are expected to support significant UK investment, employment, supply chain activity and economic value, while involving a substantial network of UK-based suppliers. These projects represent significant private-sector investment in the United Kingdom and have the potential to deliver substantial economic benefits and long-term support for communities connected to the North Sea energy sector. Recent industry estimates indicate that the projects could support thousands of jobs and generate billions of pounds of economic activity during their lifetimes.

At a time when the United Kingdom must rely on oil and natural gas for a substantial portion of its energy needs, developing domestic resources can contribute to energy security and reduce reliance on imported supplies. Jackdaw and Rosebank are expected to make meaningful contributions to domestic production and support the resilience of the UK's energy system during a critical period for the UK. On the basis of what these projects mean for our business, our employees, and the United Kingdom as a whole, we support the granting of consent for both developments.

I respectfully ask that the Secretary of State take account of the interests of businesses and workforces throughout the UK supply chain and reach a timely decision so that companies can plan with confidence and continue investing in people, skills and infrastructure.

Yours faithfully,

J0164

To the Business Support Team,

I am writing to express my strong support for the Jackdaw Field Development project (Reference: PRA/357).

I believe this project is vital for the UK's long-term energy security. Utilizing domestic North Sea resources helps reduce our reliance on imported gas, stabilizes energy costs, and strengthens our national infrastructure. Furthermore, the continuation of this project protects thousands of highly skilled jobs in the northeast of Scotland and supports the wider supply chain.

The developer has demonstrated a clear commitment to addressing environmental regulatory standards, and I trust that the project will be managed responsibly while delivering essential energy to millions of homes.

I urge the regulator to approve the updated environmental assessment so that production can safely commence

J0165

Please Don’t reopen Rosebank or Jackdaw. The harm to the climate far outweighs the benefits. Please say no to more oil and gas. With good wishes,

J0166

I object in the strongest of terms to the proposed Jackdaw development, on the grounds that it not only will it itself cause massive emissions, but will also legitimise other similar projects around the world, blowing apart the Paris agreement and dooming us to a cataclysmic 'hothouse world' future. The IEA has said that there is no new oil and gas development on a credible pathway to limiting global temperature rise to 1.5°C.

The arguments that the development will contribute to the UK's energy security and/or reduce prices are clearly erroneous since fossil fuels are traded on world market under the aegis of the energy companies regardless of where they originate.

J0167

Afternoon,

I fully support a just transition and I doubt no one is arguing against the need to move toward a greener future. However, achieving this successfully requires genuine collaboration with the industry experts and business leaders right here in the North East who understand the practical realities on the ground.

While much of the current debate rightly focuses on potential job losses and the erosion of expertise within the energy sector itself, there is far too little reference to the severe knock-on effect this will have across Grampian’s broader economy.

When energy families face job insecurity and tightening budgets, it isn't just one sector that suffers, it cripples our local supply chains and consumer facing industries. Sectors like Food & Drink, Hospitality, and Construction will all face immediate hardship as household spending dries up. Without disposable income, families won't just struggle to survive, they won't be able to support or enjoy the incredible local businesses that make the North East what it is.

Decisions on projects like Jackdaw and Rosebank must account for this complete economic ecosystem. We need policy aligned with local industry leadership to protect not just energy jobs, but the vibrant, interconnected Grampian community as a whole.

Best,

J0168

[redacted]

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

31 July 2026
Re: D/4260/2021

Dear Secretary of State,

On the application by Adura Operations Limited for development of the Jackdaw gas field.

Summary

Adura's further information does not resolve the fundamental deficiency in the originally submitted Jackdaw environmental statement. Adura has carried out a significance assessment of Scope 3 emissions, as required by the Supplementary Guidance. However, the methodology it uses is constructed in such a way that any individual project would be found to have 'insignificant' Scope 3 emissions under the current state of oil and gas demand. A test that produces the same 'not significant' verdict regardless of whether the world is on or off track for net zero is not fit for the purpose the EIA Regulations require it to serve.

However, a pathway exists by which development of the Jackdaw field could be made consistent with the Paris Agreement while bolstering the Government's own North Sea Future Plan. This would require Adura to accept a legally binding, quantified obligation to permanently store a rising share of the Scope 3 (Category 11) emissions associated with its products, embedded within a broader supply-side carbon management policy framework as we set out in our submission. This would provide a coherent basis for a 'minor adverse' significance conclusion that does not depend on comparators that will always favour the applicant while supporting continued investment and employment in the North Sea during the transition.

1.0 Adura's significance methodology would likely find any individual project to contribute 'insignificant' Scope 3 emissions under the current state of global oil and gas demand.

Adura's approach to evaluating significance (Items 6, 7, 8, 10, and 11) rests on comparing Jackdaw's Scope 3 emissions against global and UK totals (global GHG emissions, global oil and gas combustion emissions, and UK carbon budgets). It concludes in each case that the project represents a "very small proportion" of the relevant total and is therefore "not considered to have a likely significant effect." In its original environmental statement, Adura acknowledges the problem with this comparator (Section 5.3.2) noting that "comparing any UK project in isolation to global CO_2 emissions will always result in the individual project being a small proportion of those emissions." Regardless of how the comparator is drawn – against national budgets, sectoral scenarios, or global demand pathways – a single field will always look small.

2.0 Approving Jackdaw without additional mitigation measures would add further committed emissions to an already oversubscribed global carbon budget.

The scientific evidence establishes that existing oil and gas fields already contain more carbon than can safely be combusted within the remaining 1.5°C carbon budget, leaving no atmospheric headroom for new production without further mitigation measures. These findings are consistent with widespread warnings from UK scientists that oil and gas extraction from fields with existing exploration licenses will "severely undermine" the Climate Change Act 2008, the UK's legally binding net zero target, and ultimately the world's ability to limit warming to 1.5°C.[1]

The remaining global carbon budget for limiting warming to 1.5°C is now approximately 150 Gt of CO_2, equivalent to less than four years of current global emissions.[2] Against this constraint, committed emissions from existing oil and gas fields alone amount to approximately 469 Gt of CO_2, exceeding the 1.5°C budget more than threefold (assuming the CO_2 generated is released to the atmosphere and not subsequently stored).[3] The International Energy Agency's net zero emissions scenario reaches the same conclusion, finding that no new oil and gas fields are required beyond those that have already received a final investment decision as of 2021.[4] Independent analysis published in *Science* by UCL researchers confirms this finding across the median 1.5°C scenarios reviewed in the IPCC's Sixth Assessment Report.[5]

3.0 The GHG intensity comparisons underpinning the 'minor adverse' conclusion do not appear to cover the project's full operating life.

The average GHG intensity figures presented to support the 'minor adverse' conclusion presented in Table 9 cover only the period 2026 – 2031 despite Jackdaw anticipated cessation of production in 2037 (see note on page 49). The same table shows intensity rising sharply towards the end, from 19.9 $kgCO_2e$/boe in 2030 to 28.2 $kgCO_2e$/boe in 2031 as production tails off in late life. Adura explains that the increase in intensity in 2031 reflects the declining production during late-life operations and does not indicate a degradation in operational efficiency. However, no explanation is given for why the assessment period stops five years before cessation, and the years excluded are, on the pattern shown, the ones most likely to weaken the favourable emissions intensity figure.

4.0 Adura's justification for the 'minor adverse' conclusion demonstrates compliance with existing arrangements, not that the project supports rather than undermines the trajectory to net zero.

Item 10 asked Adura directly to substantiate its 'minor adverse' conclusion, noting that "it is unclear how the project is considered to be fully in line with measures necessary to achieve a trajectory towards net zero" and requests clarification. Adura's response does not attempt to demonstrate this directly. Instead, it sets out five respects in which Jackdaw is said to be consistent with existing arrangements: (1) that the UK carbon budget already accommodates continued hydrocarbon use to 2050, of which Jackdaw is a small share; (2) the North Sea Transition Deal already expects the sector

[1] Cambridge Zero (2023) 'Hundreds of UK scientists and academics urge Prime Minister Rishi Sunak to prevent any new oil and gas field development' (28 March 2023). https://www.zero.cam.ac.uk/node/345
[2] Muttitt et al. (2025). The Climate Implications of New Oil and Gas Fields in the UK – An overview of the evidence. https://www.ucl.ac.uk/policy-lab/sites/policy_lab/files/report-climate_implications_pages_online.pdf
[3] Ibid.
[4] IEA (2021). Net Zero by 2050: A Roadmap for the Global Energy Sector, p.99. https://www.iea.org/reports/net-zero-by-2050
[5] Green, F., Bois von Kursk, O., Muttitt, G. & Pye, S. (2024). No new fossil fuel projects: The norm we need. Science 384(6699): 954–957. https://www.ucl.ac.uk/social-historical-sciences/political-science/research/climate-politics/no-new-fossil-fuel-projects-norm-we-need

to reduce emissions over time, with which Adura says it complies; (3) that Jackdaw's GHG intensity is lower than the UK average and substantially lower than imported LNG, methodological discrepancies described in 3.0 notwithstanding; (4) that Jackdaw and Shearwater's combined methane intensity is well below UK and global averages; and (5) that Adura meets applicable methane-related policy commitments.

Each of these is a claim that Jackdaw complies with, or performs well against, arrangements that already exist. None of them is a claim that approving Jackdaw contributes to, or is even consistent with, reaching net zero. Showing that a project's emissions intensity is lower than a comparator shows only that the project is not unusually bad relative to business as usual. It does not demonstrate that granting consent for new extraction, on top of what is already committed, is compatible with a carbon budget that must shrink to zero.

5.0 A production licence for Jackdaw could be consistent with the UK's climate commitments if the developer demonstrates compliance with a geological net zero pathway through a binding mitigation plan.

Recent clarifications in peer-reviewed literature have established broad consensus that *geological net zero* (GNZ) is the physically necessary condition required for durable climate stabilisation.[6,7,8] GNZ is achieved when CO_2 arising from fossil fuel use is balanced by an equivalent volume of CO_2 captured and stored on a geological timescale. This differs from less durable offsets such as reforestation, which operate on timescales orders of magnitude shorter than those of fossil carbon and do not constitute a like-for-like substitute. The GNZ imperative was reflected in the recommendations put forth in the Independent Review of Net Zero (2023) by [redacted] MP.[9]

A pathway exists by which a production license could be granted on terms that are scientifically coherent with the principles of GNZ. For Jackdaw to proceed on this basis, the developer must submit a legally binding mitigation plan committing to geological-timescale storage of combustion emissions (Scope 3, Category 11) on a declining geological emissions intensity pathway reaching net zero by 2050. This plan would provide the basis on which the environmental statement satisfies the updated EIA guidance.

The consent should be embedded within a broader supply-side carbon management policy framework so that project-level conditions are consistent with, and reinforce, the UK's climate commitments rather than treated as isolated obligations on a single licensee. One robust example is the Carbon Takeback Obligation (CTBO),[10] which requires fossil fuel producers to permanently store an increasing fraction of the CO_2 associated with the use of their extracted hydrocarbons. This could be operationalised through a geological emissions intensity trajectory that declines from 2025 levels on a schedule consistent with cost-effective pathways for meeting the Paris Agreement's

[6] Frankhauser et al. (2021). The meaning of net zero and how to get it right. https://www.nature.com/articles/s41558-021-01245-w
[7] Allen et al. (2022). Indicate separate contributions of long-lived and short-lived greenhouse gases in emission targets. https://www.nature.com/articles/s41612-021-00226-2
[8] Allen et al. (2024). Geological Net Zero and the need for disaggregated accounting for carbon sinks. https://www.nature.com/articles/s41586-024-08326-8
[9] DESNZ (2023) Mission Zero: Independent Review of Net Zero, Department of Energy Security and Net Zero. https://www.gov.uk/government/publications/review-of-net-zero
[10] Boot et al. (2025). Markets & Mandates: Policy Scenarios for UK CCS Deployment & Exploring the Role of a Carbon Takeback Obligation. https://netzeroclimate.org/wp-content/uploads/2025/01/Markets-Mandates-2025.pdf

temperature goals – approximately 16% of emissions captured by 2035, 64% by 2045, and 100% (full geological net zero) by 2050.

6.0 A conditional development consent for Jackdaw could, if properly structured, establish a replicable model for Paris-aligned oil and gas production.

A development consent structured on these terms would be transformative for several reasons. It would demonstrate that oil and gas production can, in principle, be made consistent with the physical requirements of the Paris Agreement and address the economic uncertainty that currently undermines investment in North Sea infrastructure. A coherent supply-side policy framework will support continued tax revenues from fossil fuel extraction during the energy transition while strengthening the business case for domestic carbon capture, utilisation and storage (CCUS) infrastructure. By creating a mandatory and growing demand for geological CO_2 storage, a CTBO would provide the long-term demand certainty that CCUS projects require to attract private investment, addressing one of the principal barriers to deployment that has historically limited the sector's development.

In the absence of a mitigation plan aligned with the principles of geological net zero, the project cannot demonstrate that it avoids contributing to global carbon budget overshoot. Therefore, we respectfully urge the Secretary of State and OPRED to require Adura Operations Limited submit a revised environmental statement that presents a legally binding, project-specific mitigation plan demonstrating how combustion emissions (Scope 3, Category 11) will be permanently stored by 2050, with a quantified geological emissions intensity pathway declining to zero by that date.

Yours Sincerely,

[redacted]

Head of Atmospheric, Oceanic and Planetary Physics, Department of Physics, [redacted]

Professor of Geosystem Science, Environmental Change Institute, School of Geography and the Environment, [redacted]

[redacted]

[redacted]

UK Director, Carbon Balance Initiative

Associate, Oxford Net Zero

[redacted]

Disclaimer: *The contents of this document and the views expressed solely represent those of the authors and do not necessarily represent those of the* [redacted]

J0169

To whom it may concern,

I am writing to formally submit OPITO's response to the consultation regarding the Jackdaw Field Development by Adura (ES/2022/001).

OPITO is the global, not-for-profit skills body for safety-critical sectors, working with employers, training providers and governments to develop a safe, skilled and adaptable energy workforce through internationally recognised training and competence standards. Every year, OPITO standards support the training and competence of over 500,000 individuals across the world, helping to ensure that people working in safety-critical roles have the knowledge and skills required to operate safely.

From a workforce perspective, OPITO supports the continued progression of the Jackdaw development. Investment in major energy projects such as Jackdaw provides confidence for employers to recruit, retain and develop the highly skilled workforce on which the UK energy sector depends. Stable investment signals and a visible pipeline of projects are essential to maintaining workforce capability, encouraging long-term skills development and giving both individuals and employers the confidence to invest in training and competence.

The UK offshore energy workforce is also increasingly characterised by mobility between sectors. Through initiatives such as APTUS, OPITO has helped demonstrate how common standards and recognition of transferable competence can support workforce mobility across offshore oil and gas, offshore wind and other emerging energy sectors. APTUS has supported the energy sector for the last 27 years with the development of highly skilled technicians. The programme has engaged with more than 20 operators and contractors across its lifespan and has helped over 2,000 apprentices develop careers in the energy industry. With a retention rate of 90+% on completion of the programme, the skills and knowledge that the apprentices develop on the programme are highly demanded by the industry. This reinforces the importance of maintaining a skilled core workforce that can respond to changing industry demand while supporting the UK's wider energy transition.

Continued investment in projects such as Jackdaw helps sustain high-value employment across the UK energy supply chain, supports energy security and reinforces the UK's industrial capability. Maintaining a highly competent offshore workforce is particularly important during the energy transition, as many of the technical, engineering and operational skills developed within the oil and gas sector are directly transferable to emerging industries including offshore wind, carbon capture and storage, hydrogen and other low-carbon technologies. Retaining these skills today will be critical to delivering the UK's future energy ambitions.

Alongside workforce development, OPITO continues to invest in the future talent pipeline through engagement with schools, colleges, universities and local communities, helping to inspire the next generation to pursue careers across the energy sector. Through its STEM initiative, My Energy Future, OPITO engages young people around the world through digital content, hands-on learning experiences and industry partnerships.

OPITO Ltd is a private limited company, registered in Scotland – Company Registration Number 152175. Registered Office: Minerva House, Bruntland Road, Portlethen, Aberdeenshire, AB12 4QL. VAT Registration Number: 115 087 433

In 2025-26, programmes supported through My Energy Future directly engaged more than 7,000 young people and teachers through Stemovators, involved over 500 pupils in Aberdeen Science Centre's Offshore Wind for Kids initiative, and continue to support Glasgow Science Centre's Powering the Future Learning Lab, which reaches approximately 11,000 students across Scotland each year. The recently launched My Energy Future Champions programme further amplifies this work, with 15 Global Champions sharing their career journeys through content that has generated more than 137,000 impressions and reached almost 59,000 people worldwide. Long-term projects such as Jackdaw provide an important signal to those entering the workforce that there are sustainable, high-quality careers available within the UK's offshore energy industry.

For these reasons, OPITO believes that projects which provide long-term workforce confidence and investment certainty make an important contribution to the UK's energy future. We therefore support the progression of the Jackdaw development and respectfully ask that OPRED gives due consideration to the workforce and skills benefits outlined above as part of its assessment of the application.

OPITO also stands ready to support the safe development of the Jackdaw workforce by working with industry, training providers and other stakeholders to ensure that those involved in the project have the skills, competence and safety-critical training required to work safely throughout the asset lifecycle.

Thank you for considering OPITO's submission as part of this consultation.

Yours sincerely,

[redacted]

[redacted]
Director of Policy, OPITO

OPITO Ltd is a private limited company, registered in Scotland – Company Registration Number 152175. Registered Office: Minerva House, Bruntland Road, Portlethen, Aberdeenshire, AB12 4QL. VAT Registration Number: 115 087 433

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J0170

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Department for Energy Security and Net Zero
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30th July 2026

D/4260/2021: Response to OPRED Consultation – Jackdaw Environmental Statement

Aberdeen & Grampian Chamber of Commerce (AGCC) welcomes the opportunity to respond to the consultation on the environmental information submitted in respect of the Jackdaw development.

As Scotland's largest business membership organisation, AGCC represents more than 1,400 businesses employing 100,000+ people across the North-east of Scotland and beyond. Our membership spans the full energy ecosystem, including oil and gas, offshore wind, carbon capture and storage, hydrogen, professional services, manufacturing, technology and the wider supply chain.

We recognise the importance of robust environmental assessment and support the UK's legally binding commitment to achieving net zero. We also believe that environmental decisions should be made in the context of the UK's continuing energy requirements, recognising both the impacts of domestic production and the consequences of increasing reliance on imported energy.

Our response therefore focuses on the wider environmental, economic and societal considerations that we believe are relevant to OPRED's assessment.

A balanced environmental assessment

The UK will continue to require significant volumes of natural gas for many years as it progresses towards net zero. The question facing policymakers is therefore not whether gas will continue to be consumed, but where that gas will come from.

If domestic production is constrained, demand will instead be met through increased imports. Those imports frequently originate from jurisdictions with higher production emissions and require additional transportation, processing and shipping before reaching UK consumers.

We therefore believe any environmental assessment should consider not only the emissions associated with domestic production, but also the environmental consequences of replacing that production with imported alternatives.

Evidence submitted by the operator indicates that Jackdaw gas would be produced with significantly lower production emissions than imported liquefied natural gas. The Adura-operated portfolio targets production emissions below 10kgCO_2e per barrel of oil equivalent, while Jackdaw gas is estimated to be around 78% less carbon intensive than imported US LNG. Meanwhile, emissions from UK Continental Shelf production have already fallen by 34% since 2018.

These figures demonstrate that where continuing UK gas demand exists, responsibly produced domestic gas can reduce the overall emissions associated with meeting that demand.

British Chambers of Commerce Accredited

Living Wage Employer

Registered in Scotland as a company limited by Guarantee
Registration number SCO 000 791
VAT Number 265 3165 59
Registered Office: The Hub, Exploration Drive, Aberdeen Energy Park, Bridge of Don, Aberdeen, AB23 8GX

Supporting the UK's energy transition

AGCC strongly supports the transition to a lower-carbon economy. Indeed, our membership includes many of the companies delivering offshore wind, carbon capture, hydrogen, electrification and wider decarbonisation technologies.

However, our research consistently demonstrates that businesses believe the transition will be most successful if it is managed pragmatically rather than through an accelerated decline in domestic energy production.

Our latest Energy Transition Survey found that 93% of respondents agree there remains a future for North Sea oil and gas, provided the UK establishes the right fiscal and regulatory framework.

Respondents also identified consenting complexity, policy uncertainty and delays to project delivery as key barriers to investment.

The survey also highlights that businesses do not see the future as a choice between oil and gas or renewable energy. Rather, they support a balanced transition that maintains energy security and industrial capability while accelerating investment in lower-carbon technologies.

We believe the Jackdaw project is consistent with that balanced approach.

Wider economic and societal considerations

The environmental assessment should also recognise the wider public interest associated with maintaining domestic energy production during the transition.

Jackdaw forms part of a wider package of investment expected to generate £28.7 billion of gross value added to the UK economy, support more than 3,500 jobs during peak construction, sustain around 880 long-term operational roles and create more than 125 apprenticeships.

Together with Rosebank, the projects are expected to generate approximately £1.4 billion in tax revenues during the current Parliament.

Jackdaw also has particular strategic significance because it could provide more than 6% of UK gas production at peak output, equivalent to heating approximately 1.4 million homes, reducing reliance on imported gas during a period of continuing geopolitical uncertainty.

More than £3billion has already been invested in preparing Jackdaw and Rosebank for production, with businesses throughout the UK supply chain committing significant resources over several years. Our own open letter, supported by more than 2,000 businesses, workers and organisations, reflected the widespread view that timely decisions are required to provide certainty for investors, supply chains and communities.

Industry confidence

Our research demonstrates that prolonged uncertainty is itself creating negative consequences. Energy Transition 43 identifies policy uncertainty and consenting complexity among the principal barriers to investment across the energy sector.

Businesses consistently report that they require long-term certainty if they are to continue investing in both existing energy production and emerging transition technologies.

This builds upon the findings of Energy Transition 42, which highlighted declining confidence, investment being diverted overseas and increasing concerns around the long-term competitiveness of the UK Continental Shelf under conditions of continuing uncertainty.

Providing certainty through a timely regulatory decision therefore has significance beyond a single development, reinforcing confidence in the UK's ability to deliver a predictable and credible investment environment.

Conclusion

AGCC believes OPRED's assessment should recognise that the environmental consequences of refusing domestic production cannot be considered in isolation from the UK's continuing demand for natural gas.

Where demand remains, lower-emissions domestic production can reduce the carbon intensity associated with imported alternatives while supporting energy security, investment, employment and the development of the industrial capabilities required to deliver the wider energy transition.

For those reasons, we believe the environmental information supports a positive determination for the Jackdaw development.

Yours sincerely,

[redacted]

[redacted]
Chief Executive

J0171

Dear Sirs

Please note my objection to permission being granted for further exploitation, drilling or extraction at The Roaebank (and Jackdaw) sites.

We are in a climate emergency. Science accepts the harm to the environment of using fossil fuels. Thousands are dying in excess heat in the UK as a direct consequence of increased CO2 in the atmosphere from the use of fossil fuels. Keep it in the ground!

Direct all available resources as a matter of urgency to a just transition to renewable and sustainable energy.

Stop the tax breaks to fossil fuel companies. Stand up to the capitalist bully boys and their lobbyists for the sake of our children and grandchildren.

Thank you.

J0172

To the Secretary of State:

Re: D/4260/2021

My view is that we should allow the Jackdaw Field operation to proceed.

3 reasons:

1. Greener: We are putting more CO2 into the atmosphere by buying LNG from eg. Qatar.
2. More diverse: The uncertainty of conditions due to the ongoing war in Iran.
3. Practical: The ongoing job losses in the North East when the national grid has not been able to keep up with progress in the renewables industry and so replace job losses.

Yours sincerely,

J0173

No!

Watch the National Emergency Briefing about the climate crisis. Listen to the experts. Look at the droughts, wildfires and heat-related deaths this year.

There must be no new oil and gas licences issued.

J0174

Absolutely not. Environmental vandalism, given where we are in the climate crisis.

No more drilling.

J0175

I welcome the opportunity to respond to this consultation regarding the environmental impact assessment for the Jackdaw and Rosebank developments.

In my view, the UK should continue to make responsible use of its domestic oil and gas resources during the transition to a lower-carbon economy. While the long-term objective of achieving net zero is important, this transition will take time and the UK will continue to require significant quantities of oil and natural gas for many years.

Jackdaw and Rosebank are not speculative proposals. They have already attracted substantial private investment, with more than £3 billion committed. Jackdaw's offshore platform has been installed and is approaching start-up, while the Rosebank floating production vessel has already arrived west of Shetland. Given the advanced stage of both developments, it is important that decisions are taken with due regard to the considerable investment already made, regulatory certainty and investor confidence in the UK Continental Shelf.

These projects are expected to provide significant economic benefits for the United Kingdom, particularly for Scotland. They have the potential to generate around £28.7 billion of economic value, support approximately 3,500 construction jobs, create around 880 long-term operational roles and provide 125 apprenticeships. These benefits extend well beyond the operators themselves, supporting a wide range of engineering companies, fabrication yards, marine services, technology providers and local supply chain businesses.

Domestic production also contributes to UK energy security. The UK remains dependent on oil and gas, and reducing domestic production without a corresponding reduction in demand would increase reliance on imports. Jackdaw alone is expected to provide around 10% of UK gas production at start-up and could supply enough natural gas during the winter to heat approximately 1.4 million homes. Producing these resources domestically reduces exposure to international supply disruptions and geopolitical risks.

From an environmental perspective, I recognise the importance of carefully assessing project impacts. However, it should also be acknowledged that producing oil and gas from the UK Continental Shelf generally has a lower greenhouse gas emissions intensity

than importing equivalent liquefied natural gas from overseas, particularly where imports involve long-distance transportation and energy-intensive liquefaction and regasification processes. Environmental assessments should therefore consider the wider implications of import substitution as well as project-specific emissions.

The projects are also expected to make a meaningful contribution to public finances, with estimated tax revenues of approximately £1.4 billion before the end of this Parliament and around £3.8 billion by 2034. These revenues can help support public services while the UK continues to invest in the transition to lower-carbon energy.

Overall, I believe Jackdaw and Rosebank represent strategically important developments that balance economic growth, employment, energy security and environmental responsibility. I therefore support the continuation of these projects, subject to compliance with all applicable environmental standards, monitoring requirements and regulatory obligations.

J0176

Dear Secretary of State

The Jackdaw field must not be granted consent, for the following reasons:

The evidence is clear that human-caused climate change is supercharging heatwaves, drought and wildfire risks, including in the UK. This includes by 'climate whiplash', with wetter winters fuelling vegetation growth, while hotter, drier summers cause it to dry out and burn. This is happening now.

- Any new exploitation of fossil fuels adds to these risks.

- Far from helping struggling households: exploitation of North Sea gas WILL NOT bring down energy bills; it WILL negatively impact poorer households disproportionately, by contributing to climate impacts such as the superheating of the places they live in, increases in food prices due to worsening food security, and water shortages.

- The UK must lead by example and increase investments in renewable energy, rather than approving fossil fuel projects.

I have two young children. The impacts of climate change are already being felt, including by them in the form of the heat and lack of rain this summer. Impacts will inevitably worsen, but by how much depends on the decisions made now. Please do not grant the Jackdaw field consent.

J0177

Dear Secretary of State

I feel very strongly that the Jackdaw field must not be granted consent. The evidence from all the experts at the National Emergency Briefing on climate change makes it clear that it would be incredibly irresponsible to continue extracting and burning fossil fuels.

It is the first duty of government to protect its citizens, and new drilling increases the risks of extreme weather events which are experiencing this summer - heatwaves, wildfires and droughts. Last year my neighbours were flooded out of their homes for the second consecutive year.

The fossil fuel lobby is strong, protecting the short term financial interests of a few, but it is the shout of a dying dinosaur. The sooner we transition to sustainable solutions the safer and cheaper it will be for all of us. The UK should lead by example by investing in renewable energy.

The Climate Change Committee's carbon budget in 2025 estimates that reaching net zero by 2050 will cost £4 billion a year– 0.2% of GDP - most of which will be met by the private sector. The Office for Budget Responsibility puts the costs of net zero at £70 per person per year.

Please do not grant the Jackdaw field consent.

J0178

Dear Sir/Madam,

The UK has declared a national emergency as a result of the extreme heatwaves and drought being experienced by the country this summer.

I object to the proposed Jackdaw field development, and urge the Secretary of State not to agree to the OPG's grant of consent for this project to proceed.

Scope 3 emissions of Shell's Jackdaw project must be taken into consideration when assessing the environmental damage caused by burning the gas extracted. These emissions

from the gas from Jackdaw, when burnt, set to generate more CO2 than the annual emissions of Ghana, and will further exacerbate the climate crisis, accelerating the frequency and intensity of climate disasters. The government is duty bound to protect it's citizens and by allowing the Jackdaw project to proceed, the government will be violating it's duty to protect the health of it's citizens.

Thank you very much.

Regards,

J0179

Public consultation response: D/4260/2021

I'd like to register my very firm opposition to the granting of this licence at jackdaw

It will lead to millions of tonnes of extra (scope 3) CO2 emissions that at a time of worsening climate impacts (drought, wildfires, floods etc) we as a human race can do without.

Particularly given the IEA have said we don't need anymore oil and gas drilling.

Approving this field runs completely counter to the UK's Paris commitment

Also;

It will produce very few jobs (27!?!)

Do nothing to reduce energy costs for uk households as all oil and gas will be sold on the open international market

Any tax given to the government will be claimed back in tax relief

Drilling passes serious risk to the North Sea ecosystem

Please do not approve this licence

J0180

I am responding to the consultation for the possible consent for drilling in the Jackdaw field.

The environmental impact would be appalling and the case for UK moral leadership in the aim for net zero would be trashed.

It is said we could open this field as the UK only contributes 1% of overall carbon emissions, this is mealy mouthed. We do not count all the emissions we have contributed since we started the industrial revolution and therefore should be held liable for. And we do not count emissions from our imports, or from shipping and aircraft. If the real figures were included our share would dramatically rise. We must ensure the assessment of Scope 3 impacts is a truly legitimate assessment.

As a country we want (and should) show leadership to Net Zero, however by opening this field (and Rosebank) we would begin a race to the bottom as all fossil fuel producing countries would continue, or increase their production, leading to the horrifying consequences we are already seeing, ie increasing wildfires and drought, more food shortages, more immigration and more conflict over resources.

It would be a totally dreadful legacy to leave to the future of this planet.

Please do not consent to this application.

J0181

Public consultation response: D/4260/2021

I'd like to register my very firm opposition to the granting of this licence at jackdaw

It will lead to millions of tonnes of extra (scope 3) CO2 emissions that at a time of worsening climate impacts (drought, wildfires, floods etc) we as a human race can do without.

Particularly given the IEA have said we don't need anymore oil and gas drilling.

Approving this field runs completely counter to the UK's Paris commitment

Also;

It will produce very few jobs (27!?!)

Do nothing to reduce energy costs for uk households as all oil and gas will be sold on the open international market

Any tax given to the government will be claimed back in tax relief

Drilling passes serious risk to the North Sea ecosystem

Please do not approve this

J0182

Dear sir/madam

I'd like to register my very firm opposition to the granting of the licence at Jackdaw.

I am very concerned about the future negative impact it will have on the environment as it will lead to millions of tonnes of extra CO2 emissions. It will contribute to more fires, floods, and climate change.

We don't need it, the IEA have said we don't need anymore oil and gas drilling.

Approving this field runs completely counter to the UK's Paris commitment.

It will not reduce energy costs for UK households as all oil and gas will be sold on the open international market.

Drilling passes serious risk to the North Sea ecosystem.

Please do not approve this licence

J0183

Public consultation response: D/4260/2021

I'd like to register my very firm opposition to the granting of this licence at Jackdaw.

I cannot believe that yet again we are succumbing to the pressure from profiteering fossil fuel lobbyists.

It will lead to millions of tonnes of extra (scope 3) CO2 emissions that at a time of worsening climate impacts (drought, wildfires, floods etc) we as a human race can do without.

Particularly given the IEA have said we don't need anymore oil and gas drilling.

Approving this field runs completely counter to the UK's Paris commitment

Also;

It will produce very few jobs (27!?!)

Do nothing to reduce energy costs for uk households as all oil and gas will be sold on the open international market

Any tax given to the government will be claimed back in tax relief

Drilling poses serious risk to the North Sea ecosystem

Please do not approve this licence

Very sincerely

J0184

Hello,

I'd like to register my very firm opposition to the granting of this licence at Jackdaw.

It will lead to millions of tonnes of extra (scope 3) CO2 emissions that at a time of worsening climate impacts (drought, wildfires, floods etc) we as a human race can do without.

Particularly given the IEA have said we don't need anymore oil and gas drilling.

Approving this field runs completely counter to the UK's Paris commitment

Also;

It will produce very few jobs (just 27);

Do nothing to reduce energy costs for UK households as all oil and gas will be sold on the open international market;

Any tax given to the government will be claimed back in tax relief;

Drilling passes serious risk to the North Sea ecosystem.

Please do not approve this licence.

J0185

Public consultation response: D/4260/2021

I'd like to register my very firm opposition to the granting of this

licence at Jackdaw. It will lead to millions of tonnes of extra (scope

3) CO2 emissions that at a time of worsening climate impacts (drought,

wildfires, floods etc) we as a human race can do without, particularly

given the IEA have said we do not need any more oil and gas drilling.

Approving this field runs completely counter to the UK's Paris commitment.

Additionally, it will produce very few jobs, less than 30, do nothing to

reduce energy costs for uk households as all oil and gas will be sold on

the open international market. Any tax given to the government will be

claimed back in tax relief. Drilling is a serious risk to the North Sea

ecosystem.

Please do not approve this licence.

J0186

I wish to object to any more gas/oil extraction. The UK would have to sell these to the highest bidder but would not profit from any sale or be able to use any of the gas or oil. It would just add to global warming.

J0187

I am writing this email to voice my concerns and objection to the possible renewal of drilling in the North Sea for oil and gas. This proposal is irresponsible and, frankly,

reckless; the emissions that would result from extracting and burning these fuels would do untold harm to our climate and environment. This would be a mockery of our country's past, present, and continuing commitment to net zero policies; which have proved successful and are a much better alternative for energy security, being a long term solution, being cleaner, and being cheaper.

We should be a country that is led by science, not a country led by greed or short-termist ideals (nor should we let ourselves be influenced by the rather disreputable American administration). The science is clear: net zero is necessary to sustain life on this beautiful planet and prevent further climate catastrophe.

I do believe [] genuinely cares about the younger generation, his policies regarding practical and vocational education and moves to improve the employment and employability of people my age evidences this. As such, he must not allow renewed drilling to be carried out in the North Sea, for the sake of my generation's future.

Yours sincerely, and hopefully,

J0188

To whom it may concern,

I am writing to submit a formal response as a member of the public and a UK citizen to the ongoing consultation on the approval of Jackdaw and Rosebank oil fields (open until the 10 and 17 August).

I urge you to REJECT the approval and progress of the Rosebank and Jackdaw oil fields off the coast of Shetland.

Put simply, this will not strengthen the UK's energy independence. Oil is traded on the international market, and there is no guarantee that oil extracted in GB will be used in GB at a cheaper price than oil sourced from anywhere else in the world.

Former Secretary of State Ed Miliband was right to make his day one priority the rejection of licences for all new oil and gas fields in GB. This U-turn is a betrayal to those who voted in the current government, which will come back to harm the government in the next election. It is a narrow minded political move, motivated by short-term profit.

The only credible route to energy security and cheaper energy bills is to continue investment in renewable generation, upgrade our aging grid, and electrify our heat and transport.

Climate change is not a far flung threat, it is happening now. This summer has seen unprecedented heatwaves and wildfires all across Europe, putting England especially under intense pressure withstanding consistent 35-40 degree heat.People do not have time to wait. A rejection of the Rosebank and Jackdaw oil fields is a rational investment into a liveable future for ourselves and our families.

J0189

While the UK should reduce the level of exploration for oil and gas to help move towards net zero, and so not encourage new development, it appears sensible to permit production from Jackdaw to assist with future energy security and the ultimate transition towards net zero, given how far the project has now progressed. We need to be pragmatic on this matter, while striving for more renewables and strengthening our electricity grid infrastructure.

I say this as a long term supporter of 'green' measures to reduce our dependency on fossil fuels, having already invested considerable sums in my own home installing an ASHP pump with underfloor heating, solar PV on the roof coupled with a battery system, and an EV charge point (currently using a plug in hybrid, but will replace with fully electric car in coming years

J0190

To the Business Support Team, OPRED

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I write on behalf of Bureau veritas Solutions Marine & Offshore Ltd., a marine and engineering consultancy firm based in Aberdeen, Scotland, to formally represent our position regarding the pending consent decision for the Adura project. We employ 53 UK-based staff, 120 overseas personnel, and work with over 150 associate consultants. Adura is our largest client and represents the primary focus of our workforce across multiple service lines. Our business planning, investment strategy, and recruitment forecasts for the coming years are entirely contingent upon a successful outcome to this consultation.

The prolonged uncertainty surrounding this decision, combined with the current downturn in the UK Continental Shelf offshore energy sector, has forced us to implement protective measures: we have frozen all UK recruitment, are considering redundancies among our UK workforce, and are evaluating overseas relocation of roles and capabilities. These actions are direct consequences of our inability to plan with confidence pending your decision.

This project supports a substantial supply chain of businesses throughout the United Kingdom, with material implications for employment, skills retention, and the viability of offshore energy consultancy firms across the sector.

We respectfully urge the Secretary of State takes account of representations from the businesses and workforces affected. A timely determination will enable our organisation and the broader supply chain to proceed with investment, recruitment, and operational planning with confidence.

We stand ready to provide any additional information required.

Yours faithfully,

J0191

To Whom it May Concern

Please accept this email as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020. As a business in the supply chain, I write in support of consent for these projects.

I am writing on behalf of Whittaker Engineering (Stonehaven) Ltd, an integrated engineering and manufacturing business based in Stonehaven, Aberdeenshire, employing 143 people. We design, manufacture, install and repair complex equipment and components for the energy sector, bringing together engineering, fabrication, machining, mechanical and offshore capabilities at our Stonehaven facility.

Our commercial interest arises from our long-standing role in the North Sea supply chain. Since 1983, we have supported oil and gas projects both onshore and offshore, providing specialist engineering and manufacturing services and deploying skilled personnel to client sites, installations and vessels. Developments such as Jackdaw and Rosebank create demand throughout the supply chain, including for the capabilities, facilities and skilled workforce maintained by businesses such as ours.

Our business planning depends on a clear and timely decision. Consent would provide greater confidence in the future North Sea order book and help businesses such as ours make decisions about investment, recruitment, workforce development and apprenticeships. The uncertainty of recent months has made it more difficult to forecast demand and commit resources with confidence, particularly where maintaining specialist engineering and manufacturing skills requires sustained investment over many years.

These projects support a large supply chain of businesses like ours across the UK, together with the jobs and skills within it. On the basis of what they mean for our business and our employees, we support the granting of consent.

I ask that the Secretary of State take account of representations from the businesses and workforces affected and reach a timely decision, enabling companies throughout the supply chain to plan with confidence.

Yours faithfully,

J0192

Please accept this formal representation to the Secretary of State regarding the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), submitted further to the public notices of further information under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of **Kernow Analytical Technology Limited**, a specialist laboratory based in North Petherwin, Cornwall, employing five dedicated team members. We provide critical flow assurance and production chemistry testing to the oil and gas sector.

Our interest in these projects is vital to our survival and growth. As North Sea business rapidly dwindles, our forward planning and business confidence are being directly eroded. Prolonged regulatory delays severely impair our ability to make decisive operational choices - stalling essential local investment and freezing recruitment.

The economic benefits of approving these developments extend far beyond the North Sea. They filter directly down to nationwide supply chain businesses like ours in regions far removed from the offshore hubs. Cornwall remains one of the most economically deprived areas in the UK; every skilled job, every piece of capital investment, and every commercial contract we secure plays a crucial role in bolstering our local economy and preserving high-value technical skills.

Projects like Jackdaw and Rosebank are the lifeblood of a sprawling UK-wide supply chain. Based on the tangible economic security these approvals will bring to our business, our employees, and the broader supply network, **we strongly support the granting of consent.**

We urgently ask the Secretary of State to consider the voice of the workforces and small businesses directly impacted by these decisions. A clear, positive, and timely decision is essential to restore commercial confidence and enable companies across the UK to plan for a stable future.

Yours faithfully,

GREENPEACE

J0193

Reference: D/4260/2021

Greenpeace UK Submission to OPRED on Adura's Further Information (Regulation 12(1) Response) on Jackdaw Scope 3 emissions

Adura (the Shell/Equinor joint venture) are the proposed developers of the Jackdaw gas field in the North Sea.

Following legal rulings on the wider impacts of CO2 emissions from burning oil and gas (so-called 'Scope 3 emissions'), Shell needed OPRED and the UK government to re-issue a development permit for the Jackdaw field in order to proceed. Shell produced a Scope 3 emissions assessment in November 2025, on which Greenpeace UK submitted comments in December 2025. On 27th March 2026 OPRED served a Regulation 12(1) Notice on Adura containing twenty numbered items requiring further information, several of which reflected the deficiencies we had identified. Adura responded on 19th June 2026, and it is that response which is the subject of the present consultation.

Greenpeace UK has examined the Adura document “Jackdaw Field Development – Responses to Regulation 12(1) Notice (27th March 2026)”. The question for this consultation is a narrow one: does the further information remedy the deficiencies that OPRED itself identified? It does not. In every one of the twenty items, Adura's position leaves the conclusions of the original assessment unchanged. The deficiencies we identified in December 2025 remain. In several instances the response has made the underlying reasoning more explicit, and in at least two instances Adura's own new material makes our case for us.

Greenpeace UK finds the following:

1. **Our previous submission made five key points of substance, none of which has been remedied.** In December 2025 we found that:

   (i) the Environmental Statement relied on a 'drop-in-the-ocean' comparison of Jackdaw's emissions against global emissions, a form of assessment the government's supplementary guidance says is not adequate;
   (ii) it failed to assess Jackdaw cumulatively with other existing and planned fossil fuel projects in a global context, as the guidance requires;
   (iii) it treated the IEA scenarios as if they justified extraction, when they are policy scenarios, not predictions of production, and under the Net Zero Emissions scenario some existing reserves must stay in the ground;
   (iv) it contained no quantification of the global carbon budget or of Jackdaw's impact upon it; and
   (v) it rested on an unevidenced assumption that Jackdaw's gas would substitute for production elsewhere.

We also noted that the economic damage caused by the emissions was entirely absent from the assessment.

We deal with each in turn below.

2. **On not using ‘drop-in-the-ocean’ arguments OPRED put our criticism to Adura in clear terms about, and Adura has not answered it.** The Regulation 12(1) Notice states that characterising the emissions from the project solely in numeric terms against global GHG emissions:

“does not provide a meaningful expression of the global effect of those scope 3 emissions because of the obvious difference in scale”

This is the same point made in the supplementary guidance (p12) which we quoted in our previous submission. Adura's answer is to expand the method: Table 7 presents Jackdaw's Scope 3 emissions as between 0.003% and 0.02% of annual global emissions across a larger set of scenarios than before, and the conclusion to Item 10 rests on the observation that “the projected Jackdaw proportion of global GHG emissions is anticipated to be less than 0.02% in any reference year” (p59). The method the regulator described as not meaningful has been expanded rather than replaced. A criticism of the 'drop-in-the-ocean' argument is not answered by measuring the drop against several different oceans. Item 8, which raised the same concern against UK national targets, is answered entirely by cross-reference to Items 6 and 10.

3. **Failure to assess Jackdaw cumulatively with other existing and planned fossil fuel projects in a global context. A carbon budget analysis now appears for the first time against the wrong budget.** Adura states (p58) that “the estimated remaining global carbon budget from the beginning of 2025 that give a 50% chance of limiting warming to 2°C is circa 1050 Gt CO2 (Forster, 2025)”, against which Jackdaw's 0.0358 GtCO2e is presented as immaterial. The choice of budget is instructive. The same source, Forster et al (2025), estimates the remaining budget for a 50% chance of limiting warming to 1.5°C at around 130 GtCO2. That figure, the one relevant to the Paris Agreement temperature goal around which Adura's own significance test is framed, appears nowhere in the 159 pages of the response. The reason is not hard to find. Adura's own consultants supply it (p58): Wood Mackenzie data indicates that “circa 1/3 of the remaining global carbon budget to limit warming to 2°C could be attributed to those hydrocarbons combusted in end use during the lifetime of the Jackdaw Project”, that is, roughly 350 GtCO2 from production that is already onstream, under development or probable. That is around two and a half times the entire remaining 1.5°C budget. Adura has, in its own document, quantified precisely the cumulative problem we raised in December: the world's committed fossil fuel production alone exceeds the 1.5°C budget, before Jackdaw adds to it. To be compatible with 1.5°C, Adura would need to show how extraction of gas at Jackdaw would mean that other gas, from existing developed reserves, stays in the ground. They still do not do this.

4. **IEA scenarios do not justify extraction. Adura's own appendix concedes the point about the IEA scenarios that its conclusions deny.** In December, Greenpeace UK noted that the IEA scenarios are not predictions of production and do not justify extraction, and that under the Net Zero Emissions scenario reserves must stay in the ground. Appendix 3 of Adura's response now records (p138) that in the IEA's World Energy Outlook 2025 the NZE scenario “is no longer a limited-overshoot scenario, as warming peaks above 1.6°C and exceeds 1.5°C for several decades”, that the APS scenario has been excluded from the Outlook altogether, and in Adura's own words that under NZE there are:

   “No new long-lead time oil and gas projects required.”

   The main text nevertheless concludes (p59) that “the Jackdaw Project is considered to be fully in line with measures necessary to achieve a trajectory towards net zero”. Even on repeated reading it is extremely hard to understand the line of thinking that leads to this conclusion, other than that pipeline gas has lower production emissions than LNG. In other words, a scope 2 argument, not Scope 3, which is what this consultation is about.

   A document that concedes in its appendix what its conclusions state to be otherwise has not answered the regulator's question.

5. **The substitution assumption is now explicit, and remains entirely unevidenced.** In our previous submission we noted that Shell assumed, without evidence, that Jackdaw was among the lucky ones that could still produce in climate-constrained scenarios. Adura has now stated the assumption plainly (p36):

> *"the likely evolution of climate conditions… will likely continue on a similar trajectory with or without the Jackdaw Project. Currently producing facilities and future development projects will meet whatever demand for oil and gas is generated by the framework of policy measures enacted by national governments"*

No citation or market analysis is offered in support, here or anywhere else in the response. The comparison with imported LNG (said to be around 4 MtCO2e worse over the field's life) assumes perfect, barrel-for-barrel substitution of Jackdaw's entire production by US LNG, describes imports as "the do-nothing case", and on that basis asserts "a beneficial net effect" from a 35.8 million tonne project. Importing LNG is not the do-nothing case; the do-nothing case is that the gas stays in the ground, with whatever mix of substitution, price response and demand reduction follows, none of which is modelled. The peer-reviewed literature indicates that additional supply lowers prices and increases consumption. The Borgarting Court of Appeal in Norway (LB-2024-36810-4, 14th November 2025), the EFTA Court (E-18/24) and the European Court of Human Rights have each made clear that assessments must proceed on gross emissions and cannot rely on speculative market substitution assumptions. If the words 'the Jackdaw Project' were replaced with the name of any coal, oil or gas development in the world, Adura's sentence would serve equally well. An argument that justifies everything assesses nothing.

6. **Adura now refuses cumulative assessment outright, and deflects rather than answers the evidence on committed reserves.** The supplementary guidance (p12) states that the Environmental Statement "must consider the cumulative effects of the proposed project with other existing and planned future projects, in a global context." Adura's response is that "effects of GHG emissions from specific cumulative projects should not be individually assessed, as there is no basis for selecting any particular cumulative project(s) GHG emissions for assessment over any other" (p58, citing ISEP), and that the SSP scenarios are "inherently cumulative". A regulatory requirement is not discharged by declaring it arbitrary, and guidance from a professional membership body does not override the regulator's stated expectation. Nor is the selection arbitrary: the other UKCS developments currently passing through the same post-Finch re-assessment process, and the global stock of developed reserves, are obvious and non-arbitrary comparators. Adura does acknowledge the peer-reviewed work we cited (Trout et al), only to deflect it with the observation (p152) that such studies "appear not to consider the proportion of these emissions associated with the energy used in the production of the fuel." The central finding that committed extraction alone exceeds the 1.5°C budget is nowhere disputed. An efficiency quibble about value-chain losses is not a rebuttal; and the accompanying suggestion that "it is prudent to use all fossil fuel reserves efficiently" is an argument for constructing a global policy framework that stands no chance of being agreed, which is to say it is not a carbon budget argument at all.

7. **Adura has widened its baseline to include a world in which the Paris Agreement targets are not met.** Required by OPRED to consider scenarios beyond the Paris-aligned pathways used originally, Adura now bounds the future state of the climate between SSP1-1.9 and SSP2-4.5, the latter would create a world of roughly 2.7°C of warming. The effect of assessing Jackdaw against a failing world is to dilute the apparent significance of its contribution. It is a curious approach to environmental assessment in which the worse the outlook becomes, the less any individual project is

said to matter. The legally relevant benchmark remains the Paris-aligned carbon budget and the UK's own net zero framework, not an assumed failure of both.

8. **The significance test Adura applies is one that no project could ever fail.** Adura repeatedly states that the scenarios are not forecasts and that no likelihoods are assigned to any pathway, and so declines to conclude that any effect is 'likely'; it acknowledges (p53) that “the impact on the climate is considered 'likely' as GHG emissions from any project will contribute to climate change”, which is true of every fossil fuel project ever proposed. It even quotes UNEP's warning that “Each additional 0.1°C of global warming is associated with an escalation of damage, losses and adverse health impacts” before concluding, two pages later, that 35.8 million tonnes is 'Minor adverse'. Combined with the proportional comparisons discussed above, this constructs a test which every fossil fuel development on Earth would pass. As we said in our previous submission, an assessment of this kind provides no useful insight, and it is not what the EIA Regulations require.

9. **The economic case is presented one-sided: benefits without sensitivities, and damages not assessed at all.** The response claims lifetime GVA of over £4.4 billion, based on Adura-supplied inputs. The Supply Chain Action Plan and Socio-Economic Template were withheld from the regulator on grounds of commercial confidentiality. The employment figures deserve scrutiny: of the average of nearly 500 jobs a year over the field's life, 273 are pre-existing positions on the Shearwater host installation, and only 27 are new full-time roles attributable to Jackdaw. Against these benefits, no damage figure of any kind is offered. Appendices 1 and 2 catalogue the scientific record of climate damage at length, including heat mortality, disease, crop loss, OECD estimates of regional GDP losses, but under a disclaimer that they “do not express the views or opinions of Adura”, and with no attempt to attribute any quantum of damage to Jackdaw's own 35.8 million tonnes. As we set out previously, on Bressler's estimate that 4,434 tCO_2 emitted causes one excess heat-related death globally between 2020 and 2100, Jackdaw's emissions imply some 8,074 deaths; at the Treasury's Value of Prevented Mortality of £2 million, the damage is over £16.1 billion, several times the claimed lifetime GVA, before infrastructure damage, air pollution, and non-heat climate mortality are counted. Nothing in the further information supplied for this consultation engages with damages at all. Jackdaw remains economically unjustifiable in anything other than the most blinkered and reductive way.

10. **Adura presents Jackdaw as an enabler of further, unassessed fossil fuel extraction.** Invited by OPRED (Item 19d) to provide evidence on the extent to which the project could share infrastructure with offshore wind, hydrogen or carbon capture projects, Adura offers nothing on any of them. Instead it states (p89) that “Undeveloped gas discoveries on existing licences could be unlocked by Jackdaw” and that “Jackdaw volumes have justified the extending Shearwater Area fields into the 2030's, unlocking further development drilling at Shearwater.” The project's infrastructure legacy, on Adura's own account, is more gas extraction. These are precisely the cumulative effects of the project with 'planned future projects' that the guidance requires to be assessed, and they are nowhere assessed.

11. **Across all twenty items, nothing changes, which is itself instructive.** In every item, Adura's conclusion is that the further information does not affect the conclusions of the original assessment. Item 8 is answered by cross-reference. The tables summarising the state of climate science are accompanied by a disclaimer disowning them. The Regulation 12(1) process has been treated as an exercise in justifying a conclusion already reached, rather than in reassessment. That is not the purpose for which Regulation 12 exists.

12. **Greenpeace UK concludes that the further information does not remedy the deficiencies OPRED identified, and the Environmental Statement remains**

non-compliant with regulatory requirements. The response repeats the 'drop-in-the-ocean' assessment the regulator said was not meaningful; quantifies the carbon budget only at 2°C while its own sources show committed production already exceeds the 1.5°C budget several times over; concedes in its own appendix that the only 1.5°C-consistent IEA pathway requires no new projects; refuses the cumulative assessment the guidance requires; and rests on an explicit but unevidenced substitution assumption of the kind rejected by the courts in Norway, by the EFTA Court and by the European Court of Human Rights. OPRED and the Secretary of State should refuse consent.

[redacted] Chief Scientist, Greenpeace UK,

August 2026

J0194

Dear Secretary of State

The Jackdaw field must not be granted consent, for the following reasons:

- The evidence is clear that human-caused climate change is supercharging heatwaves, drought and wildfire risks, including in the UK. This includes 'climate whiplash', with wetter winters fuelling vegetation growth, while hotter, drier summers cause it to dry out and burn. This is happening now.

- Any new exploitation of fossil fuels adds to these risks.

- Far from helping struggling households: exploitation of North Sea gas WILL NOT bring down energy bills; it WILL negatively impact poorer households disproportionately, by contributing to climate impacts such as the superheating of the places they live in, increases in food prices due to worsening food security, and water shortages.

- The UK must lead by example and increase investments in renewable energy, rather than approving fossil fuel projects.

The extreme weather of this year has been felt by everyone in the UK and it will continue to have dire effects on food production, public physical and mental health, the wellbeing of our ecosystems and more. Impacts will inevitably worsen, but by how much depends on the decisions made now. Please do not grant the Jackdaw field consent.

Yours Sincerely

J0195

To whom it may concern:

I'd like to register my very firm opposition to the granting of this licence at Jackdaw:
It will lead to millions of tonnes of extra (scope 3) CO2 emissions that, at a time of worsening climate impacts (drought, wildfires, floods etc), we as a human race can do without. Living in Wales, I have already experienced the devastating effects of extreme weather caused by anthropogenic climate change through worsening and increasingly frequent grassfires and flooding.

The IEA have said we don't need anymore oil and gas drilling, so we need to look into alternatives. Also, approving this field runs completely counter to the UK's Paris commitment and to the government's duty of care for its people.

Jackdaw will:
- Produce very few jobs

-Do nothing to reduce energy costs for UK households as all oil and gas will be sold on the open international market

- Have no positive outcome on the UK economy, as any tax given to the government will be claimed back in tax relief
- Cause devastating destruction in the North Sea ecosystem due to drilling; any remediation efforts would be funded by taxpayer money as always and cost the government millions.

Please do not approve this licence. You have a duty to do what is best for UK citizens, which includes preventing further damage to our ecosystems and preventing profiteering by companies at the expense of the UK population.

J0196

Dear Sir or Madam,

I am writing in support of the continued development of the Jackdaw gas field.

My views are informed by more than forty years in the offshore and subsea engineering industry. I began my career offshore as a member of commercial diving teams before progressing into onshore leadership roles across the offshore engineering, subsea construction and energy services sectors. Over the course of my career I worked with companies including Rockwater, Brown & Root, Halliburton, Stolt Comex/Acergy, Technip and Subsea 7, gaining experience across the full lifecycle of offshore developments.

As my career progressed, I held senior management, Director and Vice President positions with responsibility for health and safety, environmental management, offshore operations and general business management. This provided me with first-hand experience of the technical, operational, commercial and environmental challenges involved in delivering major offshore projects safely, responsibly and efficiently.

Having experienced the industry from both offshore operational and executive leadership perspectives, I have witnessed the transformation of the UK Continental Shelf over four decades. During that time I have seen continuous improvements in safety performance, environmental management, engineering standards and subsea technology. These advances have helped establish the UK as one of the world's leading offshore engineering centres, and the expertise developed through the offshore oil and gas sector is now being applied directly to offshore wind, floating wind, carbon capture and storage, subsea electrification and hydrogen infrastructure.

It is from this perspective that I support the continued responsible development of the UK's offshore energy resources alongside continued investment in renewable and low-carbon technologies. In my view, maintaining the engineering capability, skills, supply chains and investment confidence developed over decades is essential to both the nation's energy security and a successful transition to a lower-carbon economy.

In my view, decisions on projects such as Jackdaw should be based on realistic assessments of the UK's future energy needs rather than aspirations alone. The UK remains dependent on natural gas for domestic heating, electricity generation, industrial processes and as feedstock for many products we use every day. While renewable energy continues to expand, it cannot yet eliminate the need for reliable gas supplies.

If the UK requires natural gas, it is preferable to produce it domestically rather than import increasing volumes of liquefied natural gas from overseas. Domestic production operates under some of the world's highest environmental and safety standards, while imported LNG often carries a larger carbon footprint because of liquefaction, long-distance shipping and regasification.

Recent geopolitical events have reinforced the importance of energy security. Greater dependence on imported energy exposes the UK to international market volatility and supply disruption. Developing domestic resources such as Jackdaw strengthens resilience and helps ensure secure supplies during the transition to lower-carbon energy systems.

I also believe the Government should recognise the value of maintaining confidence in the UK's offshore investment environment. Jackdaw is not a speculative proposal. It has already attracted substantial investment and is approaching production. Businesses that commit billions of pounds to projects lasting several decades need confidence that regulatory decisions will be predictable, transparent and evidence-based.

My career has shown me that the offshore industry is about far more than hydrocarbons. It supports thousands of highly skilled jobs throughout the UK supply chain and provides opportunities for apprentices, graduates and specialist engineers. These same skills are increasingly required for offshore wind, floating wind, carbon

capture and storage, subsea power transmission and hydrogen infrastructure. Preserving this engineering capability is essential if the UK is to achieve its wider energy ambitions.

Supporting Jackdaw should not be viewed as inconsistent with the UK's commitment to reducing greenhouse gas emissions. I support continued investment in renewable energy and low-carbon technologies. However, the transition must be managed pragmatically. Until alternatives can fully replace natural gas, responsible domestic production is preferable to increasing dependence on imports with potentially higher overall emissions.

For these reasons, I support the continued development of the Jackdaw gas field. I believe it represents a balanced approach that improves energy security, supports highly skilled employment, maintains world-class engineering capability and enables an orderly transition towards a lower-carbon future.

Yours faithfully,

J0197

Dear Sirs

I have just attended a "People's Emergency Briefing" screening and discussion event, and am now more than ever convinced that new licences should not be issued for Rosebank and Jackdaw, or indeed any other fossil fuel extraction activity.

The evidence is now overwhelming that we are in a climate emergency and we must make serious and concerted attempts to mitigate the effects of climate change.

Whilst I understand that new licences would secure employment which is desperately needed, I believe the signal that would be given around the world would be that the UK is not adhering to previous legal judgements, nor honouring previous commitments towards 'net zero'.

The expectation would also inevitably arise that - having exploited fossil fuels for its own benefit - the UK will still expect developing countries not to exploit such resources within their own jurisdictions. The creation of such an impression would be quite wrong and should be steadfastly resisted.

I trust that a longer-term view for the wider good will prevail.

Yours faithfully

J0198

Public consultation response: D/4260/2021

I'd like to register my very firm opposition to the granting of this licence at Jackdaw.

It will lead to millions of tonnes of extra (scope 3) CO2 emissions that at a time of worsening climate impacts, including drought, wildfires, floods etc, posing a serious threat to life. The IEA have said we don't need anymore oil and gas drilling. Approving this field runs completely counter to the UK's Paris commitment.

Furthermore, it would:

- produce very few jobs

- do nothing to reduce energy costs for UK households, as all oil and gas will be sold on the open international market

- not contribute any tax, as anything paid would be claimed back in tax relief

- pose serious risk to the North Sea ecosystem.

Please do not approve this licence.

Regards,

J0199

Dear Business Support Team, OPRED,

I write to participate in the public consultation on the Jackdaw gas field, expressing a strong objection to granting consent for the project to commence production.

Climate change and greenhouse gas emissions

The scope 3 emissions from Jackdaw will be highly significant. According to the developer's own assessment there will be 20 million tonnes of CO2e greenhouse gas emissions through use of the gas produced over the project's life. Unlike previous oil and gas site development, we now have full knowledge of the foreseeable effects of the use of fossil fuels. Every tonne of CO2e matters when trying to slow global warming. Jackdaw would be a contributor to the problem. We all have collective responsibility to halt or reverse climate change. The UK government has pledged net zero by 2050, with a 2035 target of 81% reduction. If Jackdaw is allowed to commence production, it will be all the more difficult to reach this target.

Public interest

The world is facing a serious and high risk of food shortages, breakdown of the eco system, extreme weather and conflict. One of the most important responsibilities of the

government is to safeguard the security and wellbeing of its citizens. Persisting with fossil fuel production through Jackdaw would be to move further in the wrong direction.

Just this summer, the UK has seen record temperatures, which have resulted in 2,700 excess deaths (Met Office). Wildfires have raged across Europe, including the Cairngorms and Suffolk. Yesterday (2nd August) the National Farmers Union President Tom Bradshaw warned of food shortages ahead. Heat stress, drought, crop failure, disruption of global supply chains and increased food prices threaten our food security. UK farmers have begun using their winter food rations to feed their animals because they had been unable to grow grass.

This is just the beginning. Europe is the fastest heating continent, while those elsewhere in the world have been experiencing devastating floods (e.g. Pakistan 2022) and drought (e.g. East Africa 2020-2023).

It has been claimed that Jackdaw will create jobs and energy security, but this does not outweigh the effects of scope 3 emissions. Greenpeace estimates there will be 27 jobs created by Jackdaw. This is limited and temporary. Meanwhile, the effects of burning gas are far-reaching and long-term, meaning the economic benefits do not outweigh the enormous negative impacts of climate change.

Energy security can be achieved through clean energy. While the UK will use gas in transition to green energy, this does not justify new long-lasting gas infrastructure. We must focus on speeding up the switch to a green economy by supporting renewables and better insulation. The onus is on the developers to prove that the UK needs this particular gas field for energy security. It is not sufficient to simply state that the UK will continue to use gas.

UN Secretary-General Antonio Guterres stated (June 2026) that both the climate crisis and energy crisis required the same solution: a rapid move away from fossil fuels. Insulation, heat pumps, solar and wind power are far better measures for domestic and business heat and power. Scientists have developed the solutions, we just need leaders to adopt them.

A green economy is far safer for our children and grandchildren in terms of energy security, food security, political stability, and protection from extreme weather events.

Future generations

Humans have enjoyed a relatively stable climate for around 10,000 years. The generations to follow us will experience upheaval and instability that will threaten civilisation. It is fundamentally unjust to knowingly cause this, and to be complicit in climate change. We are all morally responsible for protecting the environment for our children and generations to come. Those with the greatest power have the greatest level

of responsibility for this, to take active steps to reduce carbon emissions and to refrain from allowing projects like Jackdaw.

Messaging and role modelling

To have any chance of halting or slowing climate change, we must put in place a multitude of measures: laws and regulations, and individual citizen actions. Lifestyle changes require public support, which will be much harder if the government has consented to production by a gas field. As well as the substantial and real environment impact of Jackdaw, this decision whether to allow production or not, holds great symbolism.

Allowing Jackdaw to enter production would be to set a precedent and make it much harder to refuse fossil fuel projects in the future. Conversely, denying its development would signal policy direction in favour of clean energy.

Further, this decision will have global political influence. I urge you to place the UK as a leading example in making bold decisions towards clean energy, to encourage a global shift away from fossil fuels. We have an opportunity to contribute to a positive tipping point to slow the pace of climate change.

There is no doubt at all that climate change is upon us, and we must do everything possible to move swiftly away from fossil fuels to renewable energy. Scope 3 emissions will contribute significantly to climate change, which is causing loss of life and livelihood. This is fully foreseeable. Instead, energy security can be achieved through clean, responsible means. Job creation pales in comparison to the devastating effects of climate change.

Please do not push us further into the catastrophe of climate change, but instead deny production at Jackdaw, and bring the UK and the world closer towards a safer future. Thank you.

Yours faithfully,

J0200

To the Business Support Team, OPRED

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001, made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020. As a business in the supply chain, I write in support of consent for both projects.

ASCO is an Aberdeen-headquartered logistics and materials management business that has supported North Sea operations for nearly 60 years. Across our UK operations, we employ 1,020 personnel: 539 in Aberdeen, including personnel who work offshore; 317 in Peterhead; 70 across our Central UK operations; and 94 across our Southern UK operations. We also have over 70 facilities and offices worldwide.

Our work includes the operation of supply bases, ports and warehouses, alongside marine coordination, freight, materials management, environmental services, lifting assurance and workforce support. These capabilities, and the experienced people behind them, help operators and their contractors deliver complex offshore projects safely and efficiently.

Our connection to Jackdaw and Rosebank is through the wider North Sea supply chain. Developments of this scale generate activity across a broad network of businesses involved in vessel operations, quayside services, storage, freight, materials handling, waste management, lifting and workforce provision. Their importance extends well beyond the companies holding the principal contracts.

The continued uncertainty surrounding major North Sea projects makes it harder for businesses such as ours to plan confidently. Our operations depend on specialist people, substantial physical infrastructure and continued investment in facilities, equipment, technology, training and apprenticeships. Those decisions require a meaningful and visible pipeline of work.

We do not suggest that every ASCO role or investment decision depends directly on these two projects. The concern is the cumulative effect of removing major developments from the basin. Without sufficient activity, companies face pressure to defer investment, reduce capacity and release skilled people. Once that capability has been lost, it cannot simply be switched back on when it is needed for offshore wind, carbon capture, decommissioning or other future energy projects.

The UK’s energy transition is essential, but new energy sources are not yet being delivered at the scale required to meet the country’s needs. Reducing domestic production while demand remains does not remove the need for oil and gas. It increases reliance on imports, moving jobs, investment and economic value overseas while leaving the UK more exposed to international markets and disruption.

A strong domestic energy sector can help provide the energy required today while sustaining the revenues, investment, infrastructure and expertise needed to build the lower-carbon system of tomorrow. The same ASCO people, facilities and capabilities developed through decades of North Sea activity are already being deployed across offshore wind, carbon capture, decommissioning and other growing sectors.

I ask that the Secretary of State recognises the importance of Jackdaw and Rosebank to businesses and workforces across the North Sea supply chain and grants consent for both developments. A timely decision would provide companies such as ASCO with the confidence needed to invest, recruit and maintain the industrial capability that Britain will need throughout the energy transition.

Yours faithfully,

[redacted]

[redacted]
CEO
ASCO UK Ltd

J0201

It will go down as the biggest mistake in government history if the above fields do not get the go ahead. We will need fossil fuels for our energy needs for many years to come as the fact we import so much proves.

False information downplaying how much oil & gas can still be extracted has been the agenda of the Net Zero fanatics.

Best Regards

Elemental Energies Services Limited
29 Abercrombie Court, Prospect Road,
Westhill, Scotland AB32 6FE

4th August 2026

To the Business Support Team, OPRED

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020. I am writing in support of consent being granted for both developments.

I am writing on behalf of Elemental Energies, an Aberdeen-headquartered wells and reservoir management company supporting operators throughout the UK Continental Shelf. Our business provides well engineering, project management, well intervention, late-life asset support and decommissioning services, employing highly skilled personnel across the energy sector.

While our involvement may not always be directly linked to a single development, our business is part of the wider North Sea supply chain that depends on continued investment and activity across the basin. Projects such as Jackdaw and Rosebank create confidence for operators, sustain demand for specialist engineering services and support the wider network of contractors, service companies and technology providers operating throughout the UK.

A positive and timely decision on both developments would help maintain activity levels, preserve critical well engineering and project delivery skills within the UK, and support future investment decisions across the sector. Continued uncertainty risks delaying investment, reducing workload visibility and undermining confidence throughout the supply chain.

Jackdaw and Rosebank represent significant long-term investments that will benefit businesses, communities and workforces across the UK. We therefore support the granting of consent and ask that the Secretary of State gives due consideration to the importance of these developments for the UK energy sector, supply chain resilience, employment and economic growth.

Yours faithfully,

[redacted]
Elemental Energies

J0204

During the current combined unprecedented droughts and wildfires across vast areas of Europe and the UK, causing thousands of excess deaths, untold environmental harm and threatening food security, reducing arable harvests and causing mass deaths in chicken sheds and heat stress for cattle which farmers have been forced to bring in to sheds and begin feeding with food meant to keep them through the winter, there are no circumstances where the UK Government could consider allowing any new fossil fuel explorations let alone live drilling or excavations.

It would be completely incompatible with commitments to keep global temperatures to below 1.5^{0}° rise in the Paris agreement, and to net zero commitments. It would also conflict with advice from the National Security Assessment January 2026 and the National Emergency Briefing and the National Emergency Briefing 27th November 2025. This is advise given not just by by climate scientists and ecologists, but by senior armed forces officers and members of the security services, advising that climate change represents a real and present danger to the health and safety of the people of the UK, and the rest of the world, even risking civil unrest, or international conflicts over resources such as food and water.

In addition, allowing Rosebank to go ahead would not lower UK energy bills or improve energy security because 90% of reserves contain oil destined for international markets.
Even if the produce of the Rosebank Field were not exported the field's small gas reserves could only reduce UK gas import dependency by just 1%. More could be achieved by retrofitting more homes to run on renewable electricity and bringing forward planning legislation requiring all new homes to be built to appropriate passivehaus standards with their own renewable energy supplies starting no later than 2027.

The Guardian newspaper recently reported that production at Rosebank, if approved, could be delayed after equipment from a rig was accidentally dropped into the North Sea in April 2026. This delay meaning that by the time the fields are actually producing oil and / or gas, which has been appropriately refined we will already be a few more years down the renewables journey and while the taxpayer will still be expected to cover development costs, the sires themselves could already be obsolete.

Fossil fuels are old, outdated, and are the cause of our problems not the solution. The only benefits to come from Rosebank or Jackdaw would be for shareholders, to whom the government does not owe any obligations or duty of care.

Therefore I demand on behalf of current and future generations of humans in the UK and across the globe, and on behalf of our wildlife, nature, climate rivers, seas and oceans, that no licences are granted for these, or any other fossil fuel sites anywhere in the UK or its waters or Islands.

Many thanks
Yours sincerely

J0205

Dear Business Support Team, OPRED

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001, made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of Wood, a global consulting, operations and engineering company headquartered in Aberdeen, with a significant UK workforce supporting clients across the energy and materials markets. As Chief Operating Officer of Wood's Operations business, I lead a global team delivering asset operations, maintenance, modifications, brownfield engineering, asset optimisation and late-life asset management for critical infrastructure across the energy sector.

Wood has a direct and long-standing role in the UK North Sea supply chain, supporting clients to operate, maintain and enhance assets safely and efficiently. In relation to Jackdaw, our teams have supported brownfield modifications on the Shearwater asset, helping to integrate new subsea and greenfield infrastructure into an existing and complex offshore environment. This work has drawn on a wide range of UK-based capability, including engineering and design, procurement, subcontract management and offshore execution.

Projects such as Jackdaw and Rosebank matter because they provide the certainty that businesses like ours, and many others across the supply chain, need to plan, invest and retain skilled people in the UK. The North Sea continues to support highly specialised engineering, project delivery, operations and offshore capability. Without a clear and timely decision on developments of this scale, there is a real risk that skills, capacity and investment will be lost from the UK supply chain at the very point they are needed to support both domestic energy security and the energy transition.

A positive and timely decision would help sustain high-quality jobs, maintain confidence across the supply chain and support the continued development of skills that are critical not only to oil and gas, but to the wider energy system. The same people and capabilities that support safe and reliable production today are also essential to the delivery of lower-carbon infrastructure, decommissioning, carbon capture, hydrogen and offshore renewables in the years ahead.

On the basis of what these projects mean for Wood, our employees, our supply chain partners and the wider UK industrial base, we support the granting of consent for both Jackdaw and Rosebank.

I would ask that the Secretary of State takes account of representations from the businesses and workforces directly affected and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

Best regards,

J0206

To the Business Support Team, OPRED
Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001
Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.
Tampnet is a telecommunications company headquartered in Norway, with a UK operation based here in Aberdeen. We build and run the offshore connectivity that North Sea platforms depend on to operate safely, and our UK arm employs a skilled engineering and commercial team here in the North East of Scotland.
Our involvement in Jackdaw is hands-on rather than incidental. Our engineers designed and installed the platform's primary communications and continue to operate them today, including the link back to

the Shearwater hub and the backup and welfare services that sit alongside it. That is real work, delivered by real people based locally, and it is typical of the roles these developments sustain across our UK business.
What we need from Government is straightforward: clear decisions, made on time. When consent timelines slip, so does our ability to plan crews, commit to investment and retain specialist staff whose skills are in demand internationally. Without a pipeline of work here, that expertise follows the work overseas, and the UK loses capability it has taken years to build. A prompt, positive decision on both fields lets us do the opposite — plan ahead with confidence and keep those skills in the UK.
We would therefore ask that the Secretary of State weighs the views of the businesses and workforces directly affected, and reaches a timely decision on both Jackdaw and Rosebank.
Yours faithfully,

J0207

Public consultation response: D/4260/2021
I'd like to register my opposition to the granting of this licence at Jackdaw.
Public consultation response: ES/2022/001
I'd like to register my opposition to the granting of this licence at Rosebank.

Both these projects will lead to increased Scope 3 greenhouse gas emissions. I've heard Andy Burnham say he will be 'pragmatic'. I don't think the laws of nature and physics will appreciate his pragmatism.

The UK Climate Change Act 2008, requires governments to set legally binding carbon budgets to reduce UK greenhouse gas emissions. Parliament amended the Act in 2019 to require the UK to achieve net zero greenhouse gas emissions by 2050.

Activities such as burning coal, oil and gas, farming and cement production are adding greenhouse gases to the atmosphere faster than natural processes (forests, soils and oceans) and current technologies can remove them.
Net zero is reached when human-caused greenhouse gas emissions are balanced by the removal of greenhouse gases from the atmosphere, so that there is no net addition.

The UK imports and exports gas simultaneously, gas flows according to contracts and market prices.
North Sea production is declining, and fields like Jackdaw and Rosebank would only partially offset that decline.
Neither field would be large enough to have much influence on global prices. Global gas markets are vastly larger.

If LNG prices soar globally, UK wholesale gas prices also rise, regardless of whether the gas came from the North Sea or Qatar.
So these fields would make only a marginal, if any, contribution to the UK's energy security.

The only effective way to improve energy security is to reduce demand

for fossil gas through home insulation, heat pumps, renewable electricity, storage and demand management.

Rosebank is owned by Norwegian energy company Equinor, which is majority-owned by the Norwegian state and Ithaca Energy with international ownership links. Its largest shareholder is Delek Group, an Israeli energy company.
Jackdaw is owned by- Shell, an international company with shareholders from many countries.

Approving more fossil fuel extraction undermines the credibility of the UK Government's commitment to achieving Net Zero and reducing energy bills. It gives a poor example to other countries.
It will not free people living in UK countries from the volatility of global fossil fuel markets. Energy bills in UK will continue to rise and fall with international gas prices, influenced by wars, geopolitical crises and decisions made by the world's major oil and gas producers. Increasing domestic production does not mean those ruling UK can set its own fossil fuel prices.

In contrast, renewable energy sources such as wind, solar and tidal power use energy that is available locally and is not bought on volatile international fuel markets.
Wind, sunshine and tides are free and are not subject to the international fuel markets that can be disrupted by wars, geopolitical tensions or decisions by overseas fossil fuel producers.
Expanding renewable energy, together with storage, home insulation and smarter electricity networks, can therefore improve the UK's long-term energy security and reduce exposure to fluctuations in global prices.

Please give this your full consideration.

J0208

Good morning

I'd like to register my very firm opposition to the granting of this licence at jackdaw
It will lead to millions of tonnes of extra (scope 3) CO2 emissions that at a time of worsening climate impacts (drought, wildfires, floods etc) we as a human race can do without.
Particularly given the IEA have said we don't need anymore oil and gas drilling.
Approving this field runs completely counter to the UK's Paris commitment

Also;
It will produce very few jobs (27!?!)
Do nothing to reduce energy costs for uk households as all oil and gas will be sold on the open international market
Any tax given to the government will be claimed back in tax relief
Drilling passes serious risk to the North Sea ecosystem
Please do not approve this licence.

Yours very concernedly

J0209

o Business Support Team OPRED,

I'd like to register my opposition to the granting of this license at Jackdaw. It makes no sense what so ever:

ECONOMY

- It will produce very few jobs...27 at best?!
- It won't increase UK energy security the oil and gas will be sold on the open international market - therefore ceasing to reduce uk household energy bills
- any tax generated by the government will be claimed back as tax relief

ENVIRONMENTALLY

- Drilling will causes devastation the North Sea ecosystem
- Approval will lead to millions of extra CO2 emissions at a time of worsening climate impacts
- IEA have said there must be no new fossil fuels for a safe liveable climate
- Approval will run completely counter to the UK's Paris commitment.

Conscience

- Can you seriously allow Jackdaw to go ahead as already we are in a state of climate chaos? Do you have children or loved ones? Approval of this field will put all living things into a state of jeopardy.

Please, please don't approve this field.

J0210

D/4260/2021 Jackdaw Consultation

I am writing to express my support for the regulator to provide production consent for the Jackdaw field.

I am an experienced North Sea geologist with over 30 years working in the Basin on both the UK and Norwegian sectors. My final job as a Subsurface Manager ended in redundancy from Harbour Energy driven by government taxes (EPL) and hostile North Sea policies that means companies are unable to make a reasonable return on their North Sea Investments.

As a member of the original Jackdaw drilling team in 2004/5 I am aware of the potential that this field has to supply the UK with significant volumes of gas to support us through next winter and beyond. It makes little sense for us, as a nation, to import this gas from overseas which exposes us to a reliance on imports when the world is at such an unstable geopolitical position and the import of LNG curtailed due to the closure of the Straits of Hormuz.

This project will also support many jobs, apprenticeships and supply chain businesses across the UK and particularly in the NE of Scotland. These jobs will provide livelihoods and tax receipts (Income tax, NI etc.) for the government. But perhaps most importantly support communities in the NE that are currently struggling with job losses due to the government's deliberate policies. The production itself

will also supply taxes direct to the government that would be lost overseas if we choose to import rather than use domestic production.

Whilst I understand the concerns of the current heat waves and need to transition this is going to take many years to happen which is recognised by the government with former Prime Minister Sir Keir Starmer acknowledging that oil and gas will remain integral to the energy landscape for years to come. Therefore gas supplies will be required to feed the 24 million gas boilers active in the country for next winter and for the foreseeable future and it makes no sense to import higher emission LNG supplies when Jackdaw is ready to supply a portion of these gas needs (10% of UK gas needs to heat 1.4 million homes the winter).

The infrastructure is in place, the wells are drilled and my understanding is that Jackdaw can be placed on stream for this coming winter. Considering all the geopolitical uncertainty in the world it makes sense to approve this project. This will save jobs, increase tax receipts, give security of supply and reduce CO2 emissions (compared to LNG).

Until this country is ready to turn off the gas taps we should do everything we can to maximise domestic hydrocarbon production. Competitor countries are doing the same and the impact of our current Net Zero policies are causing immense industrial damage to the UK economy for little measurable impact on the environment.

I therefore urge the regulator to give consent for production at the Jackdaw Field.

Regards

J0211

Dear Business Support Team,

I'd like to register my very firm opposition to the granting of this licence at Jackdaw.

Humanity needs to avoid the tonnes of CO_2 equivalent in greenhouse gases emitted into an atmosphere that is already at dangerous levels of global warming. We already have worsening climate impacts (drought, wildfires, floods etc.) and this is only the beginning - as the crisis worsens we can expect more of these.

The IEA have said we don't need anymore oil and gas drilling. Moreover, approving this field runs completely counter to the UK's Paris commitment, and Governments around the world are being held to account for failing to protect their citizens from climate change. This approval will look very bad for our Government.

Also, it will do nothing to reduce energy costs for uk households as all oil and gas will be sold on the open international market. The drilling itself posses serious risks to the marine ecosystem, particularly in the case of Jackdaw there is a threat to 13km of coral reef.

I implore you not to approve this licence,

J0212

I OBJECT to the Jackdaw Field Development.

It is widely known that the burning of fossil fuel is the cause of climate change, which is causing harm to the natural world and to the living conditions of people, other creatures and ecosystems generally. The only way to have a chance to slow climate change is to stop burning fossil fuels.

The proposed extraction is not compatible with the UK's legally binding climate commitments, would cost the UK millions of pounds in windfall tax avoidance, and the International Energy Agency has warned that no new oil and gas fields are consistent with the target of limiting global heating to 1.5°C. The UK Climate Change Committee has said that the expansion of fossil fuel production is not in line with the UK's legally-binding net zero target and that meeting the target needs an "unambiguous commitment to the fossil fuel phase out, accepting that global reserves are already too great."

None of this is outweighed by the proposed job creation and investment. There are other, better, more sustainable ways to invest and create jobs.

UK energy security is best achieved by the use of renewable energy generated within the UK, and by increasing the efficiency of use.

Please do not allow the Jackdaw development to go ahead.

J0213

Hello,

I am a British citizen in Scotland and would like to send my vehement opposition to the approval of Jackdaw. This is spitting in the face of future generations, it will do nothing to decrease our energy prices, and it will create very few jobs. It is madness to approve this in the face of such strong support from the public for climate action, our current global warming trajectories, and continued climate change impacts like the wildfires.

We can see through all of the misinformation and lobbying around oil and gas, and just want you to act in the interest of your constituents rather than big business. If you approve this, I will continue to lose faith in politics and politicians! I will suffer from increased eco-anxiety, and many of my peers will choose not to have children with governments failing to act on climate change.

Do the right thing - do not approve this!!

Best,

J0214

I wish to register my very firm opposition to the granting of this licence at Jackdaw.

Granting a licence will lead to millions of tonnes of extra (scope 3) CO2 emissions that at a time of worsening climate impacts (drought, wildfires, floods etc) we as a human race can do without. Particularly given the IEA have said we don't need anymore oil and gas drilling.

In addition it will produce very few jobs. I believe it will do
nothing to reduce energy costs for UK households as the oil and gas will be sold on the open international market
Any tax raised through the sale the majority will be claimed back in tax relief by the oil company.

We need to be protecting our planet and drilling posses serious risk to the North Sea ecosystem

Approving this field runs completely counter to the UK's Paris commitment. Please do not approve this licence

Thanking you in anticipation,

J0215

Hello,

I'd like to register my very firm opposition to the granting of this licence at jackdaw.
It will lead to millions of tonnes of extra (scope 3) CO2 emissions that at a time of worsening climate impacts (drought, wildfires, floods etc) we as a human race can do without.
Particularly given the IEA have said we don't need anymore oil and gas drilling.
Approving this field runs completely counter to the UK's Paris commitment, as well as the Government's own net zero targets.

In addition:

- It will produce very few jobs (27!?!)
- Do nothing to reduce energy costs for uk households as all oil and gas will be sold on the open international market
- Any tax given to the government will be claimed back in tax relief
- Drilling posses serious risk to the North Sea ecosystem

Please do not approve this license!

Yours sincerely,

J0216

d like to register my very firm opposition to the granting of this licence at Jackdaw.

Burn fossil fuels → Higher greenhouse gas concentrations → More heat trapped in the atmosphere → Human-caused climate change → Environmental damage and increased risks to economies, societies and global stability.

The UK Climate Change Act 2008, passed with overwhelming cross-party support, requires governments to set legally binding carbon budgets to reduce UK greenhouse gas emissions. Parliament amended the Act in 2019 to require the UK to achieve net zero greenhouse gas emissions by 2050.

Human activities such as burning coal, oil and gas, farming and cement production are adding greenhouse gases to the atmosphere faster than natural processes (forests, soils and oceans) and current technologies can remove them.

Net zero is reached when human-caused greenhouse gas emissions are balanced by the removal of greenhouse gases from the atmosphere, so that there is no net addition.

The UK imports and exports gas simultaneously, gas flows according to contracts and market prices.
North Sea production is declining, and fields like Jackdaw and Rosebank would only partially offset that decline.
Neither field would be large enough to have much influence on global prices. Global gas markets are vastly larger.

If LNG prices soar globally, UK wholesale gas prices also rise, regardless of whether the gas came from the North Sea or Qatar.
So these fields would make only a marginal, if any, contribution to the UK's energy security.

The most effective way to improve long-term energy security is to **reduce demand for fossil gas** through home insulation, heat pumps, renewable electricity, storage and demand management. If households need less fossil gas, they're less exposed to volatile international prices.

If one asks *cui bono?*, the answer is that the beneficiaries are **not only in the UK**. Some of the economic benefits, profits and dividends, would flow overseas.
For Jackdaw - Shell, an international company with shareholders from many countries, stands to make money.

Approving more fossil fuel extraction undermines the credibility of the UK Government's commitment to achieving Net Zero and reducing energy bills.
It will not free people living in UK countries from the volatility of global fossil fuel markets. Energy bills in UK will continue to rise and fall with international gas prices, influenced by wars, geopolitical crises and decisions made by the world's major oil and gas producers. Increasing domestic production does not mean those ruling UK can set its own fossil fuel prices.

In contrast, renewable energy sources such as wind, solar and tidal power use energy that is available locally and is not bought on volatile international fuel markets.
Wind, sunshine and tides are free and are not subject to the international fuel markets that can be disrupted by wars, geopolitical tensions or decisions by overseas fossil fuel producers.
Expanding renewable energy, together with storage, home insulation and smarter electricity networks, can therefore improve the UK's long-term energy security and reduce exposure to fluctuations in global fossil fuel prices.

[redacted] MP
Member of Parliament for [redacted]
House of Commons, London SW1A 0AA
E-mail: [redacted]

J0217

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

5th August 2026

Dear Sir or Madam,

Representation relating to the Jackdaw and Rosebank Field Development, reference D/4260/2021 / ES/2022/001

Please accept this letter as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Development (reference D/4260/2021), made further to the public notice of further information published under The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020. As the Member of Parliament for Mansfield, I write in support of consent for these projects.

I support the transition to a low-carbon economy. The science is clear, and the need to decarbonise is urgent. But if we are serious about delivering a just transition, we must be equally serious about protecting the workers and communities whose livelihoods depend on the North Sea.

It is crucial that the transition to net zero is fair and well managed. We must protect jobs, maintain our energy security and create new opportunities for the future. I therefore support allowing limited production on or near to existing fields while supporting the growth of clean energy industries and the jobs that come with them.

Together, Jackdaw and Rosebank represent £10.8 billion of investment, around 70 per cent of it spent in the UK, and are expected to generate £28.7 billion in gross value added across their producing lives. They would deliver £1.4 billion in tax revenues before the end of this Parliament, rising to £3.8 billion by 2034, and support over 3,500 jobs at peak construction, 880 sustained through production, and more than 125 apprenticeships already created.

There is also a clear energy security case. Demand for gas will continue through the transition; the question is not whether the UK uses it, but where it comes from. Every unit not produced domestically must be imported, typically at higher average carbon intensity, with greater exposure to volatile international markets, and with none of the jobs, skills or

[redacted] MP
Member of Parliament for [redacted]
House of Commons, London SW1A 0AA
E-mail: [redacted]

tax revenues retained here. At peak, Jackdaw and Rosebank together could provide around 10 per cent of the UK's domestic gas production, strengthening our resilience while the renewable buildout continues.

Constituency-level polling conducted this year asked residents of Mansfield about the direction of UK energy production and the energy mix they wish to see. 88% support energy independence, and 78% recognise and support the job contributions that the oil and gas sector delivers for their local area. My constituents take a pragmatic view: they want secure and affordable energy, good local jobs, and a transition that carries working people with it. Consent for Jackdaw and Rosebank is consistent with all three.

This project has been the subject of extensive scrutiny, including several rounds of public consultation since 2021. What businesses, workers and communities now need is certainty. I would therefore ask that, in taking into account the representations received, the Secretary of State gives full weight to those of the workforces, suppliers and communities that depend on this project – as well as the wider benefits to communities across the country - and reaches a timely and positive decision so that its benefits are not lost.

Yours sincerely,

[redacted]

[redacted] MP
Member of Parliament for [redacted]

J0218

Apologies I have written oilfield instead of gas, the arguments remain the same.

To Whom it May Concern,

I am writing to express my objection to the Jackdaw oilfield.

It is predicted that , including scope 3 emissions, the oilfield could produce up to 38.5 million tonnes of carbon dioxide. This is not compatible with the Climate Change Act of 2008 and international targets to keep global heating to 1.5 degrees We simply cannot be Net Zero by 2050 if this is approved. The current impact of the climate crisis is currently evident through vast wildfires.

The oilfield would weaken any UK position as a global leader on climate change and a green economy.

The oil will be sold on international markets at global prices, meaning this domestic production does not improve energy security or prices. The argument this will help ordinary people is a fallacy.

Yours Sincerely,

J0219

Business Support Team

I'd like to register my very firm opposition to the granting of this licence at Jackdaw. The thought of opening a new oil field in the midst of a climate crisis fills me with dread.

It will lead to millions of tonnes of extra (scope 3) CO2 emissions that at a time of worsening climate impacts (drought, wildfires, floods etc) we as a human race can do without.
Particularly given the IEA have said we don't need anymore oil and gas drilling.
Approving this field runs completely counter to the UK's Paris commitment

Also;
It will produce very few jobs (27!?!)
Do nothing to reduce energy costs for uk households as all oil and gas will be sold on the open international market
Any tax given to the government will be claimed back in tax relief
Drilling posses serious risk to the North Sea ecosystem
Please do not approve this licence

J0220

Ref: government consultation on Jackdaw oil field: **D/4260/2021**

I am writing on behalf of Dorking Climate Emergency. FYI here is a link to our website. Dorking Climate Emergency | Surrey Based Climate Action Group

This is a complex matter with many interlinked aspects. At the centre of this is the UK government's legal obligation to reach Net Zero by 2050. I do not see how this can be achieved if Jackdaw – and of course Rosebank – is allowed to go ahead.

Adura state that Jackdaw and Rosebank combined could make up 10% of UK natural gas production, with Jackdaw alone providing more than 6% of UK gas supply by this winter — "enough to heat 1.4 million homes". Their proposal frames both projects together as supporting "energy security, economic growth, skilled jobs, apprenticeships and substantial tax revenues."

Dorking Climate Emergency wishes to challenge these points and introduce what we see as other relevant matters.

1. International implications of a decision to go ahead.

a) The United Nations:

The United Nations is forthright – fossil fuels are the primary driver of the climate crisis and phasing them out is central to their climate agenda. In a June 2026 special address at London Climate Action Week, the Secretary-General drew on the latest scientific evidence to argue that the worsening climate crisis and growing energy insecurity are rooted in continued fossil fuel dependence. He outlined a pathway to a more secure, resilient energy future powered by renewables, stronger international cooperation, and science-based action.

b) **The UN's landmark resolution: A/80/L.65 (adopted 20 May 2026):** The resolution urges countries to cut carbon emissions by tripling renewable energy capacity, transitioning away from fossil fuels in energy systems, and phasing out inefficient fossil fuel subsidies. Climate Home News

c) Other countries worldwide are carefully watching the UK's reactions to the landmark **Finch vs Surrey County Council** case.

d) **Our dependence on importing fossil fuels:**

i) half of the UK's recessions since 1970 have been caused by fossil fuel shocks — the 1970s oil crises, and more recently the 2022 spike following Russia's invasion of Ukraine. The Climate Change Committee (CCC) put a direct number on this in March 2026: the total additional cost of a single fossil fuel price spike of the same

magnitude as 2022 is likely to be as large as the total net additional cost of meeting the entire net-zero pathway from now to 2050. One bad energy-market shock can cost as much as the whole 25-year transition. And of course we are now facing huge problems with closure of the Straits of Hormuz; if our oil production had indeed been used for our own energy security, we would have had sufficient oil reserves to weather this crisis as well as the Ukraine / Russia war.

ii) Adura's claims that drilling will help our energy security belie the fact that only around 10% of oil & gas produced from the North Sea is sold to the UK. It is sold at market rates on the open market. The only realistic way to have true energy security is to increase the rate at which we move from fossil fuels to renewables which will not happen if you approve expanded North Sea drilling.

2. Legal and moral implications of a decision to go ahead.

a) The UK signed the Paris Agreement (2015): 196 countries adopted the Paris Agreement at COP21, aiming to substantially reduce global greenhouse gas emissions and limit global temperature increase to well below 2°C, while pursuing efforts to limit it to 1.5°C. It includes commitments from all major emitting countries to cut emissions and strengthen those commitments over time, plus support for developing nations and a framework for transparent monitoring. United NationsUnited Nations

b) The UK joined the Glasgow Climate Pact (COP26, 2021): This marked a notable shift in UN climate diplomacy — countries agreed to a provision calling for a phase-down of coal power and a phase-out of "inefficient" fossil fuel subsidies, the first time these issues had been explicitly named in a UN climate decision, despite coal, oil and gas being the main drivers of global warming. Roughly 80 per cent of global greenhouse gas emissions come from energy generation and use. United NationsUnited Nations

c) Finch vs Surrey County Council: this is an important matter which I will leave to legal experts on the case and its implications.

d) The Climate Change Act of 2008, strengthened by the 2019 amendment. This made the UK the first major economy to legislate a net zero target.

3. Practical implications of a decision to go ahead with Jackdaw:

a) Carbon lock-in / stranded demand-side investment. Jackdaw is forecast to produce until around 2048 — a 25+ year asset life extending well into the UK's 2050 net zero target and past most credible heat-decarbonisation timelines. Investing in new supply infrastructure on this timescale creates a commercial and political incentive to keep gas demand alive to justify the investment, working against — not alongside — the government's own heat pump rollout and building decarbonisation targets. This is an

inconsistency at the heart of government policy: subsidising heat pumps with one hand while approving decades-long new gas supply with the other.

b) Financial implications of the effect of this on the govt's plans for net zero (please see later section).

4. Jackdaw's claims:

a) **Their emissions are a tiny proportion of world-wide emissions**. If each new proposal was allowed to use this as a basis to go ahead, nothing would change. Your analysis should consider Jackdaw's emissions cumulatively alongside Rosebank and other North Sea projects under the same "Adura" ownership, rather than each being assessed in isolation against the global total — this was IISD's specific criticism of the Rosebank process and appears equally unaddressed for Jackdaw. The DESNZ guidance itself warns this is not a meaningful way to express significance, since it would lead to the conclusion that no oilfield ever has a significant environmental impact.

Shell's most likely production scenario would generate 23.6 million tonnes of CO2, with a highest-scenario figure of 35.8 million tonnes — comparable to Scotland's entire annual emissions of 39.6 million tonnes in 2023. Most of this would be emitted between 2028 and 2032, at peak production.

b) **"Fuel for 1.4 million homes" is misleading.** Shell says Jackdaw would "provide enough fuel to heat 1.4 million homes," but gas sold into the national transmission network is a fungible commodity traded on a wholesale market, not ring-fenced for UK households — it doesn't lower bills or guarantee domestic use. It is a convenient measurement, nothing more,

We feel that you should ask Shell/Adura to substantiate how this gas is contractually or physically directed to UK home heating rather than sold at prevailing wholesale price to whoever bids for it. Dorking Climate Emergency has been unable to find these details.

5. **Jobs**:

a) Even taking Adura's most optimistic current figures at face value, this is a small fraction of the North Sea jobs already lost — the sector has been shedding jobs at a rate of around 725 a month since 1979. The sector lost around a third of its direct jobs between 2014 and 2023 alone. Jackdaw's jobs are a small offset against a much larger structural decline that clean energy investment — not new fossil fuel projects — is better placed to address.

The UK Govt's North Sea Plan highlights the way forward.

b) Clean energy job opportunities in North Scotland

Alongside many Shetland clean energy initiatives, we would like to make these points:

i) Scottish Government analysis suggests the offshore wind sector alone could support between 10,400 and 54,000 jobs across Scotland — dwarfing the job figures for Rosebank and Jackdaw combined by one to two orders of magnitude. gov.scot

ii) The Scottish Government is investing up to £500 million over 5 years to strengthen Scotland's offshore wind supply chain, with potential to unlock a further £1.5 billion in private investment. gov.scot

iii) The Energy Transition Zone in North East Scotland is backed by more than £26 million of Scottish Government investment, aimed at accelerating offshore wind, hydrogen, and CCUS development. Invest and Trade Scotland

iv) Scotland is already home to the world's first floating offshore wind farm and one of Europe's largest hydrogen bus fleets, and SSE Thermal and Equinor are developing a project at Peterhead aiming to be the world's first gas-fired power station fitted with carbon capture and storage. Invest and Trade Scotland

Sadly, there is still much to be done here and further investment is needed in developing a renewables infrastructure. Specifically:

There are insufficient domestic supply chains and UK manufacturing outlets — the UK's offshore wind projects largely source key components like nacelles, towers, and jackets from overseas. This import gap stood at £408 million in 2022, mainly from a £286.5 million gap in offshore and onshore wind. UK ParliamentUK Parliament

We therefore call on you to redirect the investment proposed for Rosebank and Jackdaw into improving the above. which would create many more jobs, more sustainably, and specifically in the same Shetland/North Scotland communities the developers say they're protecting.

To be more precise:

6. Finance. In a nutshell, oil & gas developers rely heavily on the UK govt's windfall tax relief.

a) It is hard to get specific figures for Jackdaw, but one recent analysis (July 2026) puts the combined taxpayer subsidy for both Rosebank and Jackdaw at nearly £4 billion through these tax reliefs, against projected lifetime tax revenues of up to £3.8 billion by 2034 — meaning, on this analysis, the subsidy given up-front roughly matches or slightly exceeds what the Treasury might eventually collect back in tax over the following decade.

b) These figures come from campaign groups, journalists, and independent analysts, not DESNZ or HM Treasury. The government's consistent public line is that it won't be drawn on individual project economics before the Secretary of State's consent decision.

c) **[] MP**, the Parliamentary Under-Secretary of State for Energy Security and Net Zero, during a House of Commons debate on **"Oil and Gas"** on **Tuesday, 24 March 2026** said:

"...as a Government we also have a duty to be honest about the challenges we face, and the reality is that **more domestic oil and gas production will not make us more energy secure and will not take a penny off bills**."

So the government itself has already conceded the consumer-benefit side of the economic argument, even while declining to quantify the taxpayer cost side.

We would therefore like to ask why the Secretary of State can commit to one half of that economic argument publicly but not the other.

We also press for the revenue/relief estimate to be published before the consent decision is made, given its direct relevance to "the wider benefits to the interests of the country" that the minister says will be weighed.

7. **The price of moving slowly towards net zero**, ie agreeing to North Sea oilfield expansion. Delay doesn't just push the problem back, it compresses the remaining time to deliver an even larger volume of change.

a) Great Britain's National Energy System Operator (NESO)'s road-map to net zero estimates that moving slowly towards our target will cost £14 billion less than a faster move. However these figures ignore the costs of a slower move as summarised in Carbon Brief's analysis of the Office for Budget Responsibility's detailed report on sustainabilty (Fiscal risks and sustainability – July 2025 - Office for Budget Responsibility) which states the government will save £36 billion a year by moving rapidly towards net zero. It puts the net cost of reaching net zero by 2050 at £116 billion over 25 years — around £204 billion lower than earlier projections, and equivalent to less than £70 per person per year. OBR: Net-zero is much cheaper than thought for UK – and unchecked global warming far more costly - Carbon Brief

b) Mitigation costs of climate change are already high and will increase if we do not take rapid action now and lead other nations by example.

c) Health costs: although air pollution is declining, it still poses a huge problem in the UK, with costs in human misery as well as the national purse. A June 2025 Royal College of Physicians report found air pollution may contribute to around 30,000 UK deaths in 2025 and cost the economy more than £27 billion annually in healthcare, productivity losses, and reduced quality of life — rising to as much as £50 billion when

wider effects such as dementia are included. Continued fossil combustion carries an ongoing health bill largely independent of the climate-cost arguments above.rcp-full-report-a-breath-of-fresh-air-responding-to-the-health-challenges-of-modern-air-pollution.pdf

- Weather extremes and their effect on the economy: Between August 2023 and now, total **identifiable insured** storm losses alone comfortably exceed **£1.5–2 billion** over the period. A few more figures: in 2024: Farmers lost **over £1 billion** in arable crop income, mainly from an exceptionally wet winter (Defra). In 2025 arable losses from record heat/drought were **£828 million** (ECIU analysis). We could continue with figures from the NHS. Our government and insurers (both of which are financed from our pockets) are subsidising the tardy response to climate change. Any of the so-called financial benefits of expanding Jackdaw are minimal when compared to these sums, especially when you take into account govt tax relief on the propject. To repeat a point already made: *the combined taxpayer subsidy for both Rosebank and Jackdaw stands at nearly £4 billion through these tax reliefs, against projected lifetime tax revenues of up to £3.8 billion by 2034.* Set against the above figures, this is an absurd waste of public money, giving the kiss of life to a dying industry which contributes to huge costs to our economy and to the poor health of many.

To summarise, we are looking for a consistent approach here. If the government is to fulfil its legal obligation re Net Zero and its moral obligation to future generations, it must turn its back on fossil fuels and move swiftly to create more renewables projects and infrastructure with subsidies rather than support an ailing dinosaur industry.

In conclusion, I quote [], head of energy at the Energy and Climate Intelligence Unit (ECIU), who said: “These fields make single-digit percentage difference to UK output, whereas the ramp-up of home insulation as well as heat pumps and EVs running on British renewables could dramatically and permanently cut the UK’s dependence on the volatile price of oil and gas which will increasingly need to be imported given the decades-long ongoing decline in North Sea output.”

We therefore urge you to reject the Jackdaw proposals.

1

[redacted]

Dear Sirs,

Ref: government consultation on Jackdaw oil field: **D/4260/2021**

I am writing on behalf of Dorking Climate Emergency. FYI here is a link to our website.
Dorking Climate Emergency | Surrey Based Climate Action Group

This is a complex matter with many interlinked aspects. At the centre of this is the UK government's legal obligation to reach Net Zero by 2050. I do not see how this can be achieved if Jackdaw – and of course Rosebank – is allowed to go ahead.

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magnitude as 2022 is likely to be as large as the total net additional cost of meeting the entire net-zero pathway from now to 2050. One bad energy-market shock can cost as much as the whole 25-year transition. And of course we are now facing huge problems with closure of the Straits of Hormuz; if our oil production had indeed been used for our own energy security, we would have had sufficient oil reserves to weather this crisis as well as the Ukraine / Russia war.

ii) Adura's claims that drilling will help our energy security belie the fact that only around 10% of oil & gas produced from the North Sea is sold to the UK. It is sold at market rates on the open market. The only realistic way to have true energy security is to increase the rate at which we move from fossil fuels to renewables which will not happen if you approve expanded North Sea drilling.

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3. **Practical implications of a decision to go ahead with Jackdaw:**
   a) **Carbon lock-in / stranded demand-side investment.** Jackdaw is forecast to produce until around 2048 — a 25+ year asset life extending well into the UK's 2050 net zero target and past most credible heat-decarbonisation timelines. Investing in new supply infrastructure on this timescale creates a commercial and political incentive to keep gas demand alive to justify

the investment, working against — not alongside — the government's own heat pump rollout and building decarbonisation targets. This is an inconsistency at the heart of government policy: subsidising heat pumps with one hand while approving decades-long new gas supply with the other.

b) Financial implications of the effect of this on the govt's plans for net zero (please see later section).

4. **Jackdaw's claims:**
   a) **Their emissions are a tiny proportion of world-wide emissions**. If each new proposal was allowed to use this as a basis to go ahead, nothing would change. Your analysis should consider Jackdaw's emissions cumulatively alongside Rosebank and other North Sea projects under the same "Adura" ownership, rather than each being assessed in isolation against the global total — this was IISD's specific criticism of the Rosebank process and appears equally unaddressed for Jackdaw. The DESNZ guidance itself warns this is not a meaningful way to express significance, since it would lead to the conclusion that no oilfield ever has a significant environmental impact. Shell's most likely production scenario would generate 23.6 million tonnes of CO2, with a highest-scenario figure of 35.8 million tonnes — comparable to Scotland's entire annual emissions of 39.6 million tonnes in 2023. Most of this would be emitted between 2028 and 2032, at peak production.
   b) **"Fuel for 1.4 million homes" is misleading.** Shell says Jackdaw would "provide enough fuel to heat 1.4 million homes," but gas sold into the national transmission network is a fungible commodity traded on a wholesale market, not ring-fenced for UK households — it doesn't lower bills or guarantee domestic use. It is a convenient measurement, nothing more,
   We feel that you should ask Shell/Adura to substantiate how this gas is contractually or physically directed to UK home heating rather than sold at prevailing wholesale price to whoever bids for it. Dorking Climate Emergency has been unable to find these details.

5. **Jobs**:
   a) Even taking Adura's most optimistic current figures at face value, this is a small fraction of the North Sea jobs already lost — the sector has been shedding jobs at a rate of around 725 a month since 1979. The sector lost around a third of its direct jobs between 2014 and 2023 alone. Jackdaw's jobs are a small offset against a much larger structural decline that clean energy investment — not new fossil fuel projects — is better placed to address. The UK Govt's North Sea Plan highlights the way forward.
   b) Clean energy job opportunities in North Scotland

Alongside many Shetland clean energy initiatives, we would like to make these points:

i) Scottish Government analysis suggests the offshore wind sector alone could support between 10,400 and 54,000 jobs across Scotland — dwarfing the job figures for Rosebank and Jackdaw combined by one to two orders of magnitude. gov.scot

ii) The Scottish Government is investing up to £500 million over 5 years to strengthen Scotland's offshore wind supply chain, with potential to unlock a further £1.5 billion in private investment. gov.scot

iii) The Energy Transition Zone in North East Scotland is backed by more than £26 million of Scottish Government investment, aimed at accelerating offshore wind, hydrogen, and CCUS development. Invest and Trade Scotland

iv) Scotland is already home to the world's first floating offshore wind farm and one of Europe's largest hydrogen bus fleets, and SSE Thermal and Equinor are developing a project at Peterhead aiming to be the world's first gas-fired power station fitted with carbon capture and storage. Invest and Trade Scotland

Sadly, there is still much to be done here and further investment is needed in developing a renewables infrastructure. Specifically:

There are insufficient domestic supply chains and UK manufacturing outlets — the UK's offshore wind projects largely source key components like nacelles, towers, and jackets from overseas. This import gap stood at £408 million in 2022, mainly from a £286.5 million gap in offshore and onshore wind. UK ParliamentUK Parliament

We therefore call on you to redirect the investment proposed for Rosebank and Jackdaw into improving the above. which would create many more jobs, more sustainably, and specifically in the same Shetland/North Scotland communities the developers say they're protecting.

To be more precise:

6. **Finance. In a nutshell, oil & gas developers rely heavily on the UK govt's windfall tax relief.**
    a) It is hard to get specific figures for Jackdaw, but one recent analysis (July 2026) puts the combined taxpayer subsidy for both Rosebank and Jackdaw at nearly £4 billion through these tax reliefs, against projected lifetime tax revenues of up to £3.8 billion by 2034 — meaning, on this analysis, the subsidy given up-front roughly matches or slightly exceeds what the Treasury might eventually collect back in tax over the following decade.

b) These figures come from campaign groups, journalists, and independent analysts, not DESNZ or HM Treasury. The government's consistent public line is that it won't be drawn on individual project economics before the Secretary of State's consent decision.

c) **Martin McCluskey MP**, the Parliamentary Under-Secretary of State for Energy Security and Net Zero, during a House of Commons debate on **"Oil and Gas"** on **Tuesday, 24 March 2026** said:

"...as a Government we also have a duty to be honest about the challenges we face, and the reality is that **more domestic oil and gas production will not make us more energy secure and will not take a penny off bills**."

So the government itself has already conceded the consumer-benefit side of the economic argument, even while declining to quantify the taxpayer cost side.

We would therefore like to ask why the Secretary of State can commit to one half of that economic argument publicly but not the other.

We also press for the revenue/relief estimate to be published before the consent decision is made, given its direct relevance to "the wider benefits to the interests of the country" that the minister says will be weighed.

7. **The price of moving slowly towards net zero**, ie agreeing to North Sea oilfield expansion. Delay doesn't just push the problem back, it compresses the remaining time to deliver an even larger volume of change.
   a) Great Britain's National Energy System Operator (NESO)'s road-map to net zero estimates that moving slowly towards our target will cost £14 billion less than a faster move. However these figures ignore the costs of a slower move as summarised in Carbon Brief's analysis of the Office for Budget Responsibility's detailed report on sustainabilty (Fiscal risks and sustainability – July 2025 - Office for Budget Responsibility) which states the government will save £36 billion a year by moving rapidly towards net zero. It puts the net cost of reaching net zero by 2050 at £116 billion over 25 years — around £204 billion lower than earlier projections, and equivalent to less than £70 per person per year. OBR: Net-zero is much cheaper than thought for UK – and unchecked global warming far more costly - Carbon Brief
   b) Mitigation costs of climate change are already high and will increase if we do not take rapid action now and lead other nations by example.
   c) Health costs: although air pollution is declining, it still poses a huge problem in the UK, with costs in human misery as well as the national purse. A June 2025 Royal College of Physicians report found air pollution may contribute to around 30,000 UK deaths in 2025 and cost the economy more than £27 billion annually in healthcare, productivity losses, and reduced quality of life

— rising to as much as £50 billion when wider effects such as dementia are included. Continued fossil combustion carries an ongoing health bill largely independent of the climate-cost arguments above.rcp-full-report-a-breath-of-fresh-air-responding-to-the-health-challenges-of-modern-air-pollution.pdf

- Weather extremes and their effect on the economy: Between August 2023 and now, total **identifiable insured** storm losses alone comfortably exceed **£1.5–2 billion** over the period. A few more figures: in 2024: Farmers lost **over £1 billion** in arable crop income, mainly from an exceptionally wet winter (Defra). In 2025 arable losses from record heat/drought were **£828 million** (ECIU analysis). We could continue with figures from the NHS. Our government and insurers (both of which are financed from our pockets) are subsidising the tardy response to climate change. Any of the so-called financial benefits of expanding Jackdaw are minimal when compared to these sums, especially when you take into account govt tax relief on the propject. To repeat a point already made: *the combined taxpayer subsidy for both Rosebank and Jackdaw stands at nearly £4 billion through these tax reliefs, against projected lifetime tax revenues of up to £3.8 billion by 2034*. Set against the above figures, this is an absurd waste of public money, giving the kiss of life to a dying industry which contributes to huge costs to our economy and to the health of many.

To summarise, we are looking for a consistent approach here. If the government is to fulfil its legal obligation re Net Zero and its moral obligation to future generations, it must turn its back on fossil fuels and move swiftly to create more renewables projects and infrastructure with subsidies rather than support an ailing dinosaur industry.

In conclusion, I quote Jess Ralston, head of energy at the Energy and Climate Intelligence Unit (ECIU), who said: “These fields make single-digit percentage difference to UK output, whereas the ramp-up of home insulation as well as heat pumps and EVs running on British renewables could dramatically and permanently cut the UK’s dependence on the volatile price of oil and gas which will increasingly need to be imported given the decades-long ongoing decline in North Sea output.”

We therefore urge you to reject the Jackdaw proposals.

Yours faithfully,

[redacted] (please redact if published)

DORKING CLIMATE EMERGENCY
Web: dorking-climate-emergency.net
Join us.

J0221

I would like to register my strong opposition to the granting of this licence at Jackdaw.

When you burn fossil fuels you increase greenhouse gases, trap more heat and drive further climate breakdown, irreparably . We are adding these gases faster than natural processes and technology can remove them. (Carbon capture has failed to deliver, is very expensive and releases more emissions than it removes). Environmental damage negatively impacts economies, societies and global stability as humans compete for valued resources and habitable places to live. It is estimated that between 200 million and 1.2 billion people could be displaced globally by 2050 due to environmental breakdown, climate change and related ecological threats. Over the past decade alone, weather related disasters have already forced roughly 250 million internal displacements worldwide.

Please take a moment to absorb these shocking figures..

Jackdaw would lead to millions of tons of extra (scope 3) CO2 emissions so dangerous to humanity as we currently struggle with worsening climate impacts (drought, wildfires, flood etc). The International Energy Agency has spoken out against anymore oil and gas drilling, and approval of Jackdaw would be against the UK's Paris Climate commitment.

Jackdaw would create very few jobs, and not reduce energy costs for uk families as it would be sold on the open market.

Approving more fossil fuel extraction completely undermines the credibility of the UK Government's commitment to achieving Net Zero and reducing energy bills.

Please do not approve this license.

J0222

Representation relating to the Jackdaw and Rosebank Field Developments, references **D/4260/2021** and **ES/2022/001**

Please accept this email as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of [], a Structural and civil Engineering Consultancy based in Poringland, just south of Norwich, UK. At [] we employ 15 highly qualified and trained individuals, comprising Civil and Structural Engineers, Graduates, CAD Technicians, Degree Apprentices and Admin.

Our interest in these projects is commercial: At [] around 25-30% of our business comes from Offshore Oil and Gas, particularly in The North Sea and Southern North Sea sectors. We typically provide specialist engineering services to facilitate Interfacing between fixed offshore platforms and mobile Drilling Rigs and Barges. We also engineer platform modifications and alterations. We are a small but growing business (established in 2019), and being able to plan our business growth and continue to invest in the development of our existing team. Uncertainty in this, and the wider economy, has resulted in curtailed growth of our business.

In addition to the wider benefits to the UK, these projects support a large supply chain of businesses, like ours, across the UK, and the jobs and skills within it.

Based upon the benefit that these developments mean for our business and our employees, we support the granting of consent.

I would ask that the Secretary of State takes account of representations from businesses and workforces affected, such as ours, and reaches a timely decision so that companies throughout the supply chain can plan with confidence

J0223

I'm contacting you to strongly oppose development of the Jackdaw oilfield.

The climate emissions resulting from this oilfield would be considerable and must be taken into account as this will have serious, dire impact on future generations and on the survival of all species. The IPCC has made it clear that the UK needs to divest from fossil fuels.

The UK needs a fast and fair transition to renewable energy and away from the oil and gas industry. This is urgent, to limit the effects of climate collapse.

Yours faithfully,

J0224

I'd like to register my opposition to the granting of this license at Jackdaw. It makes no sense whatsoever.

ECONOMICALLY

- It will produce very few jobs - 27 at most?

- It won't increase UK energy security - the oil and gas will be sold on the open international market therefore failing to reduce UK household energy bills

- Any tax generated by the government will be claimed back as tax relief

ENVIRONMENTALLY

- Drilling will cause devastation to the North Sea ecosystem

- Approval will lead to millions of extra CO2 emissions at a time of worsening climate impacts

- IEA have said there must be no new fossil fuels for a safe, liveable climate

- Approval will run completely counter to the UK's Paris Agreement

CONSCIENCE

- Can you seriously allow Jackdaw to go ahead when we are already in a state of climate chaos? Do you have children or loved ones? Approval of this field will put all living things in a state of jeopardy.

Please, please don't approve this field, for futures sake.

J0225

I would like to register my opposition to the granting of this license at Jackdaw. In my mind It makes no sense whatsoever for the following reasons:

ECONOMICALLY

- It will produce very few jobs - 27 at most?

- It won't increase UK energy security - the oil and gas will be sold on the open international market therefore failing to reduce UK household energy bills

- Any tax generated by the government will be claimed back as tax relief

ENVIRONMENTALLY

- Drilling will cause devastation to the North Sea ecosystem

- Approval will lead to millions of extra CO2 emissions at a time of worsening climate impacts

- IEA have said there must be no new fossil fuels for a safe, liveable climate

- Approval will run completely counter to the UK's Paris Agreement

CONSCIENCE

- Can you seriously allow Jackdaw to go ahead when we are already in a state of climate chaos? Do you have children or loved ones? Approval of this field will put all living things in a state of jeopardy.

Please, please don't approve this field, for futures sake.

J0226

This summer I've been deeply distressed by the wildfires in France and Suffolk, places I know and love. Friends and family have been struggling with the heat. Droughts are causing crop failures in the UK and abroad.

It feels insane that the Prime Minister is considering approving projects such as Rosebank and Jackdaw when we are already seeing the tangible and devastating effects of global heating.

If approved, Rosebank and Jackdaw's combined lifetime carbon emissions would cause approximately 65,495 excess heat eaths, equivalent to wiping out the entire population of Inverness. The science is starkly clear: there is no room for new oil and gas on an overheating planet.

We need to build a fairer, greener future. The government needs to support workers and communities in the transition away from fossil fuels and towards renewables, to stop subsidising planet-destroying projects and to make polluters pay.

Please stop the development of new oil and gas projects in the North Sea.

Ref. D/[illegible]/2021.

J0227

RECEIVED

[redacted]

22nd of August 2026

Dear Business Support Team, OPRED,

I am writing to tell you that I strongly disagree with your plans to start new drilling at the Jackdaw gas feild, as the use of gas leads to globle warming.

In June temperatures reached upto 39°C in Bristol, and my school had to shut for two days dew to red heat warnings. This never would have happened five years ago, but it is happening now because of climate change.

If this is what the world is like now, what will it be like when I am an adult? Some times I fear my generation will be the last. ~~to~~ This is why, on regarding this issue, we cannot afford ~~to make w~~ for you to make more problems, we need to act now.

Please donot allow this to happen, so

that my generation and all those to come can have a healthy planet to call home.

Thank you.

Your Sincerely,

[redacted]

To the Business Support Team, OPRED

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of [redacted], a business based in Altens Industrial Estate, Aberdeen South, employing approximately 400 people both on and offshore in the Oilfield Services Industry. Our interest in these projects is commercial: [redacted] supports and provides services related to drilling, well construction, intervention and well abandonment across the UK Continental Shelf, and further afield. Our activities and the services we provide drive activity across the wider North Sea supply chain, both directly and indirectly, through the employment of our Aberdeen-based workforce, the running of our Aberdeen based operational facilities and the provision of our specialist technical equipment and capability.

Our planning depends on a clear and timely decision. Consent being granted for these projects would provide significantly greater confidence in future activity levels in the UK, in turn supporting workforce planning, wider investment decisions to be taken by the business and the continued development of specialist skills. The uncertainty experienced over recent months has negatively impacted the market and has made forward planning more challenging and uncertain for businesses that play a role in the North Sea supply chain.

These projects support a large supply chain of businesses like ours across the UK, and the jobs and skills within it. On the basis of what they mean for our business and our employees, we support the granting of consent.

I would ask that the Secretary of State takes account of representations from the businesses and workforces affected, and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

Yours faithfully,

[redacted]

[redacted]

J0229

Re: Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020. As a business in the supply chain, I write in support of consent for these projects.

Jackdaw and Rosebank Field Developments are essential for the UK's energy security so not to be more reliant on imports, we also need to protect our jobs in the UK for all those who work in the industry, across the whole supply chain.

Failure to proceed with the **Jackdaw** and **Rosebank** developments (references D/4260/2021 and ES/2022/001), could have several negative consequences for our company.

[] has been providing services to the UK Oil & Gas Industry for almost 40 years, if the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001) do not proceed it would have a negative impact on our business, which could potentially be huge. Below are some of the areas our business would be negatively impacted.

Reduced Demand for Contract Personnel
Both Jackdaw and Rosebank are major UK North Sea developments. Industry estimates suggest that together they could support thousands of jobs during construction and operations phases if approved.

For [], this could mean:

- Fewer recruitment campaigns.
- Lower contractor placements.
- Reduced mobilisation activity.
- Fewer opportunities for engineering, offshore, project management, HSE and inspection personnel.

As a manpower and technical assistance provider, [] earns revenue from supplying personnel and managing contractors.
If Jackdaw and Rosebank are cancelled or significantly delayed:

- Major operators and contractors may reduce hiring budgets.
- Fewer contract vacancies would enter the market.
- Placement fees and contractor margins could fall.
- Expected growth from UKCS (UK Continental Shelf) activity could be lost.

Reduced North Sea Market Activity
The wider supply chain would be impacted:

- Operators
- EPC contractors
- Drilling contractors
- Inspection companies
- Marine services providers

A reduction in project activity tends to have a multiplier effect across the recruitment sector, reducing demand for both permanent and contract personnel.

Increased Competition Among Recruiters
If two major projects do not proceed:

- The available pool of vacancies decreases.
- Recruitment companies compete for a smaller number of opportunities.
- Margins may come under pressure.
- Existing clients become more cost conscious.

Impact on Aberdeen and UK Offshore Hiring
Both projects are strategically important to the UK offshore sector, particularly around:

- Aberdeen
- Shetland
- Operations support services
- Inspection and integrity management
- Project engineering

A downturn in these areas could reduce hiring demand in markets where [] has historically operated.

Contractor Availability and Pricing Effects
In the short term, cancellation could increase the availability of experienced offshore personnel.
While this may lower contractor rates, it can also:

- Reduce contract durations.
- Increase contractor attrition to overseas markets.
- Cause skilled personnel to leave the UK sector altogether.

The loss of two of the UK's largest undeveloped offshore projects could mean:

- Lower forecast revenue.
- Slower recovery of UK operations.
- Greater reliance on international markets (Middle East, Africa, APAC).
- Continued pressure to maintain a lean operating structure.

Thank you for taking our points into consideration.

J0230

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of [], a UK business with operations across the UK including Aberdeen, Glasgow, Aviemore, Teesside and Crawley, employing over 450 people, providing fluid transfer, power and control products and solutions across the Energy, Defence and Industrial sectors. Our interest in these projects is commercial: We have provided man-power services during the construction phase in Dubai, Norway and UK on Rosebank, and have provided essential fluid transfer products to Jackdaw. Should these projects go into production we anticipate being contracted to provide products and services over the life of these assets, supporting employment across a number of our UK operations.

Our business continues to be impacted by Government delays and changing policy decisions across the Energy market, both in conventional oil and gas exploration and production, and emerging energy transition markets such as Hydrogen with delays in the Hydrogen Allocation Rounds (HAR). In the UK sector of the North Sea our business has seen a 50% decline this summer in activity levels, directly related to government policies and delays in key projects such as Jackdaw and Rosebank. Investment, jobs, people, and supply chain companies are relocating from the UK, which is having a ripple affect throughout the supply chain. We therefore request a positive and timely consent to these field developments to help end the uncertainty in the sector.

Without a functioning and healthy oil and gas sector in the North Sea there will be no Energy Transition from a supply chain perspective. Projects such as Jackdaw and Rosebank support a large supply of businesses such as [] across the UK, and the jobs and skills within it. On the basis of what they mean for our business and our employees, we support the granting of consent.

I would ask that the Secretary of State takes account of representations from the businesses and workforces affected and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

J0231

I object to the development of the Rosebank and Jackdaw Oil and Gas Fields in the North Sea. Ref ES/2022/001

Approving new oil and gas is incompatible with a safe climate, real energy security, and a liveable future.

If approved, Rosebank could unlock over 480 million barrels of oil and produce around 254 million tonnes of CO_2 over its lifetime, at a time when communities are already facing worsening floods, wildfires and extreme weather.

Over 80% of the oil from Rosebank will be exported and any oil that reaches the UK will be sold at market rates so this will not reduce fuel prices for UK residents nor increase

our national and energy security. The number of jobs created by these polluting projects is small and would be easily eclipsed by the jobs created in the renewable energy if the subsides paid to the oil companies was transferred to the wind and solar industries.

The UK was the first country to declare a Climate Emergency. If Rosebank is approved it will send a signal to all countries that it is ok to extract the maximum amount of fossil fuels from the ground. This would be suicidal for the world, resulting in us passing climate tipping points, from which we may never recover.

STOP ROSEBANK KEEP IT IN THE GROUND!

J0232

Dear secretary of state,

I am writing to beg you to reject the Jackdaw oil field development in this consultation. This government's silence on the climate crisis has been unbelievable, despite the very clear human, environmental and financial cost we've seen in London alone this summer.

My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse, and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every

new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector. Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.
Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities. The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

J0233

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of [] Limited, a business based in Aberdeenshire employing 15 people which procure offshore vessels . Our interest in these projects is commercial as

without the procurement of vessel contracts we are unable to generate income for our business which will have an impact on our staff and their family's which will also have an impact on the wider Aberdeenshire businesses and supply chain.

Our planning depends on a clear and timely decision. The consent for these projects is vital to our order book and without this it will have a huge impact on our business. We are already struggling to invest and recruit due to the restrictive fiscal regime that is supressing our industry, which ironically have supported and somewhat propped up the UK economy for the last 60 years. [

I would strongly advise the government to look at the Norwegian model of a blended transition which should be a blueprint for our government. If you would like to discuss this please feel free to contact me.

These projects support a large supply chain of businesses like ours across the UK, and the jobs and skills within it. On the basis of what they mean for our business and our employees, we support the granting of consent.

I would ask that the Secretary of State takes account of representations from the businesses and workforces affected, and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

J0234

Please accept this as representation to the secretary of state relating to the Jackdaw and Rosebank field developments (references D/4260/2021 and ES/2022/001) made further to the public notices of further information published under the Offshore Oil and Gas exploration, production, unloading and storage (environmental impact assessment) regulations 2020.

I am writing on behalf of [], a business based on the East coast of England adjacent to Great Yarmouth in Norfolk. A business established in September 1978.

This business is heavily reliant on both these projects moving forward a pace, and the ramifications of not proceeding in a timely manner will be terminal for BFS.

We therefore urge the secretary of state to make a timely positive decision in relation to these two essential projects.

[redacted]

[redacted]

Our Ref: [redacted]

7th August 2026

OPRED
AB1 Building, Crimon Place
Aberdeen, AB10 1BJ

FAO : Business Support Team

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of [redacted] a business based in Aberdeen, Scotland employing 650people, in the provision of offshore well services.

[redacted] holds well construction-related contracts supporting both the Rosebank and Jackdaw developments. We are currently engaged in these projects and anticipate continued involvement in subsequent development phases. These developments provide employment for highly skilled personnel based in the United Kingdom and contribute to workload continuity across the broader UK energy supply chain.

Approval of these developments would provide continuity of activity within the United Kingdom Continental Shelf beyond current commitments, supporting ongoing employment, workforce development, and investment in Halliburton's UK operations. The prolonged uncertainty surrounding the consent process has created material challenges for resource planning, long-term capital investment decisions, and the ability to provide operational visibility to the suppliers and service partners upon whom our business relies. These projects support a large supply chain of businesses like ours across the UK, and the jobs and skills within it.

On the basis of what they mean for our business and our employees, we support the granting of consent.
I would ask that the Secretary of State takes account of representations from the businesses and workforces affected and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

Yours faithfully,

[redacted]

Vice President - Europe/UK

[redacted]

[redacted]

J0236

I'm writing to you regarding your ongoing consultations on the Jackdaw and Rosebank projects. I am a British citizen who is concerned about the effects of approving these projects.

I'm a member of the public. Below is my research and reasons why I do not support these projects.

Many thanks for reading this.

They will not bring energy bills down.

- The oil and gas produced from the North Sea is owned by private companies and will be sold at international market prices.1
- This has been stated by the Government's Climate Change Committee 1 and a factsheet dating from Keir Starmer's administration.2
- The government should clear up confusion about this.

Effect on the international stage:

- They may lead to a snowball effect of other countries delaying climate action or drilling more oil. We already have a vacuum left by the US's lack of climate leadership. This could significantly worsen global warming.
- If the UK – one of the world's wealthier nations – can't phase out fossil fuels, what chances do low- or middle- income countries have?

Global warming:

- The Met Office says: heatwaves in the UK "are now 30 times more likely to happen due to climate change."3
- Nearly 60% of oil and gas must remain in the ground by 2050 to limit global warming to 1.5C.4
- Antonio Guterres said, "Investing in new fossil fuels infrastructure is moral and economic madness."5

Greener gas?

- There are assertions that gas drilled from the North Sea releases less carbon through production and transport. This is true but when you account for the carbon released by burning the gas, it's relatively small.6 It may be offset by increased fossil fuel consumption elsewhere.6 It's like saying, "my house is on fire, but I'll cook dinner on the fire because it's more efficient".

Jobs:

- Jobs have been lost because the North Sea is a declining basin. According to campaign group Uplift, jobs in the North Sea declined by half between 2013-2023, despite the Conservative government licensing new drilling.7

Future policy?

- If Jackdaw and Rosebank are approved, what does that mean for future government policy? Where and how do we draw the line? There are already more oil fields in the pipeline, such as Cambo.

Sources:

1. Horton, Helena. *Factchecked: the UK government's claims about North Sea oil and gas*. The Guardian, 08 Jan 2024. Accessed 09 Aug 2026. https://www.theguardian.com/environment/2024/jan/08/factchecked-the-uk-governments-claims-about-north-sea-oil-and-gas

2. Department for Energy Security and Net Zero and Ed Miliband MP. *Iran, the Middle East and UK energy: factsheet*. GOV.UK, 06 Mar 2026. Accessed 09 Aug 2026. **https://www.gov.uk/government/news/iran-the-middle-east-and-uk-energy-factsheet - Quote: "New licences to explore new fields wouldn't make any difference to the prices set by international markets and paid by UK billpayers."

3. The Met Office. *Effects of climate change*. n.d., accessed 09 Aug 2026. https://weather.metoffice.gov.uk/climate-change/effects-of-climate-change

4. Malm, Andreas and Carton, Wim. *Overshoot*, Chapter 1, "Chronicle of Three Years Out of Control". No page number, digital edition. Quote: "When the clock strikes 2050, 89 per cent of the coal supplies staked out in 2018 will have to remain intact [to limit global warming to 1.5C], 58 per cent of the oil, 56 per cent of the gas," Quoting: Welsby, Dan et al. *Unextractable fossil fuels in a 1.5°C world*. Nature, 08 Sep 2021. https://www.nature.com/articles/s41586-021-03821-8)

5. Guterres, Antonio. Post on X. 05 Apr 2022. Accessed 09 Aug 2026. https://x.com/antonioguterres/status/1511294073474367488 - Quote: "Investing in new fossil fuels infrastructure is moral and economic madness."

6. Dunne, Daisy et al. "Factcheck: Nine false or misleading myths about North Sea oil and gas." Carbon Brief. 25 Mar 2026, accessed 09 Aug 2026. https://www.carbonbrief.org/factcheck-nine-false-or-misleading-myths-about-north-sea-oil-and-gas#10

7. Wakefield, Jasmine. *Rosebank oil field: the complete guide*. 10 July 2026, accessed 09 Aug 2026. https://www.upliftuk.org/post/rosebank-oil-field-the-complete-guide

J0237

I hear the consultation is ongoing.

We are in a trilemma,

energy security.

We need energy until we can run purely on renewables.

Jobs and money.

We need taxable income.

We are currently importing liquified natural gas. It is so ungreen to do this.

Hopefully jackdaw and rosebank aren't registered to the Cayman Islands and the income can be used for our own people

The Rt Hon Miatta Fahnbulleh MP
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Department for Energy Security and Net Zero
AB1 Building
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Aberdeen
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August 2026

Regarding: Public consultations on Jackdaw field development, D/4260/2021 and Rosebank field development, ES/2022/001

Dear Secretary of State,

We, [redacted], are writing to respond to the public consultation on the Jackdaw and Rosebank field developments.

[redacted] is an independent think tank and charity focused on ambitious leadership for the environment. Our work crosses climate, the natural environment and resource use. Since 1979, we have been working with the most influential leaders in business, NGOs and politics to accelerate political action and create transformative policy for a green and prosperous UK.

This comment draws upon concepts and evidence set out in recent [redacted] publications, including:

- *The climate blind spot,* 2026, available here: https://green-alliance.shorthandstories.com/the-climate-blind-spot/index.html
- *Wasted North Sea gas undermines calls for more UK drilling,* 2026, available here: https://green-alliance.org.uk/briefing/wasted-north-sea-gas-undermines-calls-for-more-uk-drilling/

The Jackdaw and Rosebank Field developments are two advanced oil and gas projects currently being progressed. While both projects have been promoted as supporting the UK's energy security, oil and gas produced in the UK is sold into international markets. As a result, increased domestic production is likely to have only a limited impact on consumer energy prices.

Recent analysis by [redacted] raises questions about the case for opening new oil and gas fields while significant volumes of gas continue to be wasted from existing North Sea operations through venting, flaring and methane leaks.[i] These emissions represent a direct and avoidable threat to the UK's energy and climate security, while also resulting in lost economic value and potential tax revenue.

In 2024, North Sea operators flared 566 million cubic metres of gas and vented a further 11 million cubic metres. We estimate that this is enough gas to heat over 570,000

homes for a year, equivalent to all households in South Yorkshire. At recent market prices, the value of this lost gas was approximately £300 million.[ii] If captured by operators, using technologies that are readily available, this gas could have contributed to domestic energy supplies, reduced reliance on imports and generated additional tax revenue.

Importantly, the volume of gas lost through venting and flaring is equivalent to nearly one-thirds of the projected peak production from the proposed Jackdaw gas field.[iii] Before approving new drilling projects, we argue that the Secretary of State should prioritise stronger action to reduce waste from existing operations and require operators to prevent avoidable gas losses more rapidly.

While these emissions from venting, flaring and leaks are reported to the regulator, there are no requirements around directly measuring these or having a third party verify them. There is mounting evidence that emissions are underestimated and underreported from operators by a factor of between three to five times.[iv] So, the total gas being wasted from existing operators could be greater than we think.

Gas that is vented, flared or leaked contributes to both climate change and harmful air pollution. In particular, methane, the primary component of natural gas, is a powerful greenhouse gas that is around 80 times more potent than carbon dioxide over a 20-year period. Reducing methane emissions from existing oil and gas operations would therefore deliver significant benefits for both the climate and the UK's energy security.

We therefore urge the SoS to consider the UK’s climate commitments and its role as a champion of the Global Methane Pledge and refuse to agree to the OGA’s grant of consent to the Jackdaw and Rosebank projects. Instead, a focus should be placed on reducing emissions from current North Sea operators.

Yours sincerely,

[redacted]

[redacted]

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[i] J Singh et al., 2026, *Wasted North Sea gas undermines calls for more UK drilling,* Green Alliance
[ii] Ibid
[iii] Ibid
[iv] Riddick and Mauzerall, 2023, ‘Likely substantial underestimation of reported methane emissions from United Kingdom upstream oil and gas activities’, *Energy & Environmental Science,* vol16, 295-304

J0239

Representation relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of [], a business based across the UK, employing **1,854** people. [] is a global leader in providing advanced equipment, technologies and services to the offshore energy industry, supporting the safe and efficient delivery of major offshore developments for the last forty years.

Our interest in these projects is commercial and strategically important. [] will provide a range of products and services in support of both the Jackdaw and Rosebank developments, and we have a long-standing contractual relationship with Adura that underpins our role within these projects. Our Aberdeenshire facilities play an important role in the UK offshore supply chain, delivering specialist capabilities that support major North Sea developments.

Our planning depends on a clear and timely decision. Over the last 12 months, there has been 234 redundancies. We are now operating in survival mode, with the long-term sustainability of our UK presence under continuous review by our US headquarters on a daily, weekly, and monthly basis.

[] currently support **81 apprentices** on fixed-term contracts. Our preference has traditionally been to provide apprentices with an opportunity to move into permanent employment following successful completion of their apprenticeship. However, given the current level of business and market uncertainty, discussions are taking place regarding whether permanent opportunities will be available for all apprentices completing their programmes.

Recent apprentice intake has reduced from:

- 24 apprentices three years ago
- 17 apprentices the following year – a 29% reduction
- 15 apprentices last year – a further 12% reduction

This represents an overall 37.5% reduction in apprentice intake, across the period.

Final apprentice numbers for 2026 have not yet been confirmed, but current indications are for a lower intake. This reflects a more cautious approach to future workforce

commitments while there remains uncertainty around longer-term demand and the availability of permanent positions following apprenticeship completion.

The approval of Jackdaw and Rosebank would provide critical workload, helping to sustain highly skilled jobs, retain specialist capability and improve confidence to continue investing in our UK operations. Conversely, any further delay or failure to approve these projects would have a significant adverse impact on our business, placing additional pressure on employment, investment and the future viability of our UK business. The loss of these projects would not only affect [] but would also have wider consequences throughout the UK offshore supply chain, where businesses depend on a stable pipeline of major developments to maintain skills, capacity and competitiveness.

These projects support a large supply chain of businesses like ours across the UK, and the jobs and skills within it. On the basis of what they mean for our business, our employees and the wider UK energy supply chain, we strongly support the granting of consent.

I would ask that the Secretary of State takes account of representations from the businesses and workforces affected and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

[redacted]

[redacted]

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August 6, 2026

Representation on Jackdaw Field Development – Reference D/4260/2021

Response to Reg 12(1) Further Information (Notices dated 21 July and 22 September 2025; developer response 19 June 2026)

Dear Secretary of State,

I am writing to make a representation on the Jackdaw Field Development consent decision, in response to the further information submitted by Adura on 19 June 2026 under OPRED's Regulation 12(1) Notice of 27 March 2026 (OPRED Ref: D/4260/2021).

I am a postdoctoral fellow at [redacted] University and the lead author of the study "Robust climate tests for fossil fuel supply under the Paris Agreement" ([redacted] under review at Nature Communications), which applies a suite of climate tests directly to UK oil and gas production, including Jackdaw.

I am submitting a parallel representation on Rosebank (ref. ES/2022/001); this letter sets out the findings in relation to Jackdaw.

1. The developer's response does not properly test Jackdaw's climate compatibility

The further information sets Jackdaw's estimated life-of-field Scope 3 emissions (0.0358 $GtCO_2e$) against a global remaining carbon budget of approximately 1,050 $GtCO_2$ (notably a 2°C, 50% chance budget, which is far in excess of any credible "well below 2°C" budget dictated by the Paris Agreement). The information describes Jackdaw's production in Table 8 as "not a material proportion" of the UK carbon budget, and compares the field's emissions as a percentage of global GHG emissions in any reference year at under 0.02%.

As our paper argues, this methodological error is endemic to developer assessments across the UK oil and gas sector. Comparing a single project's emissions against an inappropriately large global benchmark is not a valid test of climate compatibility. This is because it will make almost any

[redacted]

[redacted]

individual field look negligible, regardless of whether the UK's cumulative committed production already exceeds its fair or feasible allocation. The developers are committing a false equivalence fallacy: while these quantities are indeed both GHG emissions, their scales are qualitatively different and cannot be directly compared in any meaningful way. This is why we set out to propose proper ways to contextualize smaller scale emissions from individual oil and gas fields within national and global limits.

OPRED's own further information notice for Jackdaw raises a closely related concern (Items 6, 7 and 8), asking the developer to move beyond percentage-based comparisons to a genuinely cumulative assessment. It is my expert assessment that the 19 June 2026 response fails to do so.

2. Applying the climate test framework to Jackdaw

Adura's response argues that individual projects' GHG emissions should not be assessed against cumulative benchmarks because there is no basis for selecting any particular set of projects over any other.

Our framework and paper directly answer this objection. It defines a replicable, principled stacking order by likelihood of extraction (existing reserves, then approved developments, then licensed, then unlicensed contingent resources). It then tests each cumulative increment against UK-specific, Paris-aligned carbon budget allocations using different allocation principles.

Four allocation principles are used: cost-optimal, current trends (continuation of the UK's present production share), and two equity-based principles (one with partial reallocation of the current trends shares, representing a compromise between practicality and equity, and one uniquely concerned with equity that fully reallocates remaining oil and gas).

The UK has a high non-oil-and-gas GDP per capita ($48,020; 11th globally, roughly 2.3 times the mean across major producers). It follows logically that under the Common but Differentiated Responsibilities and Respective Capabilities principle in the Paris Agreement, the UK should be constraining extraction faster than lower-capacity producers. We apply these principles as partial reallocation and full reallocation, which shift a growing share of remaining extraction toward lower-capacity producers based on non-oil-and-gas GDP per capita.

Jackdaw results

Jackdaw is treated in our framework as one of the fields under active regulatory scrutiny and is included in our stacked test-subject ordering for UK oil and gas.

For gas specifically, existing UK gas reserves excluding fields under regulatory scrutiny fail all tests under 1.5°C. They show only marginal, assumption-dependent compatibility under 1.7°C even before Jackdaw's own gas production is added to the stack.

Once Jackdaw's gas volumes are added, the effect is incremental across most benchmarks. Under our full reallocation benchmark, Jackdaw fails when classified as a reserve (Table 2, Test Subject 3). Jackdaw fails under more lenient benchmarks when reclassified as a new development, which may more realistically allow for extraction of fuels in producing fields or when using higher end

[redacted]

[redacted]

estimates of reserve and resource volumes (Figure S2). On this basis, my view is that Jackdaw is not credibly compatible with fossil fuel production under the Paris Agreement. This field-specific finding aligns with the global boundary condition that no new oil and gas fields are compatible with the Paris Agreement, since combustion emissions from existing reserves excluding projects pending approval like jackdaw would already exceed remaining well below 2°C carbon budgets (Table S3). These findings still do not account for the underestimated climate impact of gas due to underreported methane emissions (Supplementary Discussion).

In addition, as Jackdaw is a high-pressure/high-temperature gas condensate field, we also classify its natural gas liquids and condensate output as oil-equivalent. This approach is corroborated by the developer's response to Item 4, which treats Jackdaw's condensate as being refined and combusted as a transport fuel, not as methane. At the UK level, existing oil and oil-equivalent reserves (which include Jackdaw's condensate) fail all quantitative 1.5°C benchmarks we tested. Under the 1.7°C benchmarks, the oil and oil-equivalent component again fails under our full reallocation benchmark. Restacking the fields to allow more room for resources in already producing fields once again would imply Jackdaw is incompatible with more Paris-aligned benchmarks.

In sum, the oil and gas that Jackdaw would produce therefore appear incompatible with UK efforts to align oil and gas production with levels required to keep global warming well below 2°C and uphold the Paris Agreement. Passing climate tests rely on highly inequitable benchmarks and/or constrained production in producing fields. As a gas producing field, upstream methane loss underestimates could exacerbate Jackdaw's climate incompatibility.

3. Request to OPRED

I ask that OPRED and the Secretary of State:

- Treat the significance conclusions in the developer's response as unsound, since they continue to rest on comparisons of Jackdaw's emissions to global and national aggregates rather than a proper cumulative test.
- Ensure developers test downstream Scope 3 emissions cumulatively against UK-specific, Paris-aligned carbon budget allocations rather than against the entire remaining global carbon budget or percentage shares of national emissions in isolation.
- Outline how OPRED and the Secretary of State have considered their commitment to Common but Differentiated Responsibilities and Respective Capabilities in the Paris Agreement.
- Consider the results summarised above, and the full methodology and data in our paper and its supplementary materials, as part of the evidence base for the decision.

The preprint is available at https://doi.org/10.21203/rs.3.rs-9546305/v1. I am happy to be contacted for clarification or further detail.

[redacted]

[redacted]

Yours faithfully,

[redacted]

[redacted]

[redacted]

Integrated Earth System Dynamics (iESD)
Department of Earth and Planetary Sciences, [redacted] University

[redacted]

J0241

I oppose the Jackdaw development because it would be reckless to drill for more gas and oil while we are already experiencing the affects of climate change from drought across the UK, wildfires, extreme heat and thousands of heat related deaths - not to mention the affect this has had on the economy and the food shortages farmers are saying British people will face because of this.

The science is clear, we can have no more fossil fuels in order to have a liveable climate. The planet is heating up faster than scientists even predicted and Europe is getting much hotter.

Fatih Birol, the world's leading energy economist has said that Jackdaw and Rosebank drilling would do very little for the UK's energy security, they would not make any significant difference to this. Experts have echoed this statement too, and also that it will do little for employment. What it will do however, is make the climate crisis worse. We are already suffering from this, and to drill for more gas and oil during a climate emergency would be incredibly reckless. Future generations will remember the government for the decisions they made during this time, let's hope it's for positive reasons.

J0242

Please register my firm opposition to granting any licence for exploration or production in the Jackdaw field of the North Sea. Any new production of oil or gas will breach the UK commitments internationally, will create more climate change, reduce food yields and damage the health of UK citizens and others globally.

The UK Climate Change Act 2008, passed with overwhelming cross-party support, requires governments to set legally binding carbon budgets to reduce UK greenhouse gas emissions. Parliament amended the Act in 2019 to require the UK to achieve net zero greenhouse gas emissions by 2050.

The most effective way to improve long-term energy security is to reduce demand for fossil gas through home insulation, heat pumps, renewable electricity, storage and demand management. If households need less fossil gas, they're less exposed to volatile international prices.

The tax breaks and other subsidies that would go to Shell Oil for Jackdaw will be much better spent on renewable energy and on preparation for the disaster already coming.

J0243

I oppose the Jackdaw development because I feel the only way to slow or halt global warming is by stopping the burning of fossil fuels. This means no new oil or gas drilling, and ceasing that which is already happening.

I am a mother of two girls, terrified for their future of unbearable summers, wildfires and flooding.

Please consider the future generations of this world by refusing to listen to oil and gas lobbyists and investing in renewable energy instead.

J0244

I'd like to register my extremely firm opposition to the reopening of the Jackdaw gas site. I know it's all ready to go but it simply adds more fuel to the fire that is climate change and actual collapse. At some point the bullet has to be bitten. We should have been working on reducing our need for gas and changing to renewables for years. This is becoming more urgent and expensive by the day. The price of fossil fuels needs to become untenable and countries like ours, which purports to be advanced should lead the way by vociferously refusing to grant any more licences to drill the north sea and actually make the changes that everyone wants. We no longer wish to be at the mercy of unaccountable fossil fuel firms worldwide. Changes must be made. I will not vote for a politics that ignores this issue.

J0245

[redacted]

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8 August 2026

D/4260/2021: Response to OPRED Consultation: Jackdaw Field Development

The [redacted] is pleased to respond to the consultation on the Jackdaw Field Development, expressing our support for consent for this project.

The [redacted] brings together 51 national Chambers of Commerce, representing businesses of all sizes and all sectors across the whole of the UK. The [redacted] has been closely engaged in the energy transition in the North Sea for several years, and had a leading role in the North Sea Transition Taskforce. This recognised the importance of delivering a long-term energy transition for businesses, workers, and investment for the whole of the UK. With supply chain businesses across the country, the impacts of the North Sea energy transition extend far beyond the North-East of Scotland.

The [redacted] is fully supportive of the energy transition towards a low carbon economy and recognises the role that many UK businesses play in supporting this through developing renewable technologies which will play an increasing role in the UK's energy mix.

Alongside this, the [redacted] recognises the essential role that many businesses and workers in the oil and gas sector play in the energy transition. Robert Gordon University has estimated that around 90% of the UK's oil and gas workforce have medium to high skills transferability and are well-positioned to work in adjacent energy sectors. This demonstrates the significant overlap between the oil and gas sector and the renewables sector. However, it is estimated that around 1,000 jobs are being lost every month in the oil and gas sector. This emphasises how important it is that the oil and gas sector does not decline faster than the acceleration of renewable energy to prevent the loss of jobs in the UK.

The [redacted] supports an 'all-energy' approach which recognises the ongoing role that oil and gas plays in the UK's energy mix. As part of this, the [redacted] is supportive of increased domestic production of oil and gas, for as long as the UK remains dependent on imports of oil and gas to make up the UK's energy demand.

In relation to Jackdaw, this project has the potential to deliver around 6% of the UK's gas supply from 1 October this year, meaning that it can provide gas to households and businesses this winter. With the conflict in the Middle East this year and the concerns around energy security linked to it, the gas provided from Jackdaw will be key in supporting the UK's energy security in the coming months and years. In addition to this, it is estimated to be 78% less carbon-intensive than imported liquified natural gas (LNG) from abroad.

[redacted]

[redacted]

Collectively, both Jackdaw and Rosebank are expected to generate billions of pounds of investment for the UK, and support the creation of jobs. It is estimated that combined, both will bring in £1.4 billion in tax revenues before the end of this Parliament, which would rise to around £3.8 billion by 2034.

The [redacted] supports the approval of both Rosebank and Jackdaw, which would strengthen energy security as well as support economic growth through investment and jobs to the UK.

[redacted]

J0246

In response to the Jackdaw Gas Field Consultation, we would urge the Government under Andy Burnham to abandon any notion of reopening this oil field, given the global warming events we are witnessing on a daily basis, whether it is forest fires in evidence this summer throughout Europe - the intolerable temperatures we are daily experiencing both day time and night time and the impact on the natural environment and wildlife.

Please be brave and set an example like other progressive countries are doing.

J0247

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of

emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.
Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.
Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.
The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

J0248

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2. **Hold fossil fuel companies accountable**for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.
3. **Invest in green jobs and infrastructure**, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

J0249

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I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

North Yorkshire Climate Coalition

Thirsk Friends of the Earth | Zero Carbon Harrogate | CPRE North and East Yorkshire | Climate Action Stokesley and Villages | Richmondshire Climate Action Partnership | Ryedale Environmental Group | Nidderdale Climate + Environment Group | Climate Action Northallerton | Clapham Sustainability Group | Thirsk Churches Ecology Group | North Yorkshire West Federation Women's Institutes Climate Change Action | Pickering Environmental Group | Project Purple Hovingham | Malton and Norton Environmental Group | Kirby Misperton Environmental Group | Action on Climate Emergency (ACE) Settle and Area | Malhamdale Environmental Group | Climate Action Skipton | Kirkbymoorside Environment Group | Fossil Free North Yorkshire | Community Climate Action Group – Sand Hutton, Claxton and Surrounding Villages | Circular Malton and Norton | Our Zero Selby | Knaresborough and Harrogate Friends of the Earth

Submission to the OPRED consultation on Jackdaw

Reference: D/4260/2021

North Yorkshire Climate Coalition, representing 24 climate and environmental groups across North Yorkshire, wishes to make the following representations in response to the OPRED consultation on the proposed Jackdaw gas field.

At a moment when the devastating consequences of climate change are becoming ever more visible across Europe and even in our own region of North Yorkshire, we believe that any decision to approve significant new fossil fuel developments would seriously undermine the UK's long-term national interest, our international obligations and our ability to fully harness the economic opportunities emerging from the transition to a low-carbon economy, while having little or no impact on energy bills, energy security, jobs or the cost of living.

The case against the Jackdaw proposal is clear.

International commitments and credibility of UK climate leadership

Any expansion of fossil fuel extraction would directly undermine the UK's legally binding national and international climate commitments (including the Climate Change Act and the Paris Agreement).

In this context, we also note the joint letter recently signed by the UK Foreign Secretary and the Spanish Foreign Minister, explicitly acknowledging that climate change is 'now a national security emergency facing Europe and threatening our way of life', The letter reaffirms UK support for the UNFCCC and stresses the importance of fulfilling the international commitments contained in the Paris Agreement, 'underlining in particular the urgency of increasing global efforts to limit the increase in temperature to 1.5°C above pre-industrial levels'.

Yet, drawing on the latest climate science, highly authoritative and independent analyses (including reports by the Climate Change Committee, the International Energy Agency and the International Institute for Sustainable Development) show that

new gas (and oil) fields are incompatible with pathways that keep global warming within safe limits.

Furthermore, any decision to approve Jackdaw would send a very damaging signal. The UK has long been regarded as a climate leader, but its future credibility among international partners depends on aligning domestic decisions with its stated ambitions. Authorising new fields risks weakening diplomatic influence at a time when global cooperation is essential.

Shell's updated Environmental Statement for Jackdaw

In our view, Shell's assessment of the field's projected downstream (Scope 3) emissions in its updated Environmental Statement is misleading, methodologically flawed and non-compliant with legal requirements.

It sets projected emissions (nearly 36 million tonnes of CO_2 equivalent over the project's lifetime) from the field in the context of the huge volume of global fossil fuel projects and concludes that the emissions are therefore "minor adverse and not significant'. This is misleading as there is an obvious difference in scale between individual projects and global emissions.

Reflecting the fact that the global climate responds to cumulative GHG volumes, the supplementary guidance issued by DESNZ for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects clarifies that Environmental Statements must consider the cumulative effects of the proposed project with other existing and planned future projects, in a global context'.

The Environmental Statement is non-compliant with the applicable EU EIA Directive, reinforced by the UK Supreme Court's *Finch* ruling, as it fails to:

- Assess cumulative combustion emissions from all national petroleum activities.
- Assess compatibility with remaining 1.5°C carbon budgets.
- Quantify indirect climate impacts (health, ecosystems, infrastructure).

The tie-back and displacement arguments

As noted by Professor Kevin Anderson in an open letter to the Prime Minister, the argument that permitting Jackdaw (and Rosebank) would not technically breach Labour's previous commitment to stop issuing new oil and gas licences is 'immaterial to the physics of climate change', which 'responds to the cumulative quantity of greenhouse gases released into the atmosphere. If these developments proceed, they will ultimately result in the release of hundreds of millions of tonnes of additional carbon dioxide.'

Research conducted by Uplift highlights that any displacement of imported LNG would be minimal (approx. 2% for Jackdaw). By contrast, Government and independent

energy research cited by Carbon Brief shows that expanding renewable energy capacity (such as offshore wind) would displace significantly larger volumes of imported LNG than new North Sea drilling can achieve.

Environmental and social costs

The extreme weather events unfolding across Europe and worldwide this summer illustrate the urgency of accelerating the shift away from reliance on burning fossil fuels. Wildfires have devastated large areas of Europe, displacing communities, destroying ecosystems, and placing enormous strain on emergency services. These fires are widely and authoritatively reported, e.g. in the 26 June report by the World Weather Attribution Group, as being intensified by prolonged heatwaves linked to climate change, and they serve as a stark reminder of the escalating risks associated with continued fossil fuel dependence, including prolonged drought, excess heat-related deaths, the widespread destruction of habitats and cherished landscapes, the drying out of soils, and not least large-scale crop disruption and the associated risk to food supplies.

With specific regard to excess mortality, we note that the projected scope 3 emissions associated with Jackdaw equate to approximately 8,000 human deaths from climate effects before 2100, according to the IPCC-derived 'mortality cost of carbon' or 'thousand tonne rule'. In financial terms, based on Greenpeace estimates and the Treasury Value of Prevented Fatality (VPF, £2 million per death), the value of not going ahead with Jackdaw is over £16.1 billion.

Any properly evidence-based decision must demonstrate strategic foresight by taking full account of these actual, projected and estimated impacts and costs.

Economic rationale and cost of living

The economic rationale for new extraction is weak. The recent CBI report highlights the strength and resilience of the UK's net-zero economy, which grew significantly even during periods of wider economic stagnation. According to the report, sectors aligned with the transition – renewable energy, green manufacturing, clean tech and low-carbon services – are expanding rapidly, attracting investment, creating skilled jobs and strengthening the UK's global competitiveness. This evidence suggests that permitting further extraction from a largely depleted basin – with minimal job creation benefits in the case of Jackdaw – would be not only environmentally damaging but economically short-sighted, misdirecting crucial investment away from the low-carbon sector.

Equally, greenlighting the Jackdaw project would offer no meaningful relief to UK consumers. As widely noted by energy analysts, the extracted resources would be sold to the highest bidder on international markets, with prices determined globally. As the highly respected economist Mariana Mazzucato puts it, 'Drilling the North Sea won't help people across the UK struggling with their energy bills'. Nor would the resulting production enhance energy security in a way that compares to accelerating investment in renewables, storage and efficiency.

A 2025 report by the LSE's Grantham Institute finds that any decision to approve the development of Jackdaw (and Rosebank) would 'lead to confusion about the direction of travel and undermine investment into the clean transition. This might be justified were there to be clear economic benefits but, in fact, such investment risks generating low returns and would be against the UK's strategic economic self-interests'.

We agree with the report's conclusions that approval would:

- lock in further reliance on volatile oil and gas markets while losing out on productivity and efficiency gains of domestic clean energy
- risk putting money into stranded assets which will require taxpayers to bail out decommissioning costs
- distract from the growth opportunity of the 21st century
- fail to capture broader benefits such as cleaner air
- undermine the UK's credibility, i.e. its ability to convince other countries to act.

In conclusion, for all these reasons – environmental, social, human, economic and diplomatic – we believe the Jackdaw proposal should be rejected and that Government should instead focus on accelerating the UK's transition to a clean, secure and future-proof energy system while ensuring that the current oil and gas workforce is offered all the support needed to find high-quality and well-paid jobs in the clean energy sector.

Yours sincerely,

North Yorkshire Climate Coalition

August 2026

J0251

Dear Secretary of State,

I am writing today to urge you to reject the Jackdaw oil field development in this consultation.

The science is clear, the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate change, deadly heatwaves, floods, and wildfire, yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in an industry that drives further climate catastrophe for the benefit of very few, when we could be building a stronger more sustainable future for the many?

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.
Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.
People and community centred adaptation strategies that support low income households with implementation in particular

Please prioritise the future of our children, livelihood of our communities and survival of our planet over the short term gains of very few.

Thank you and I look forward to your response.

J0252

Dear Secretary of State,

I am writing today to urge you to reject the Jackdaw oil field development in this consultation.

The science is clear, the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate change, deadly heatwaves, floods, and wildfire, yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

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drives further climate catastrophe for the benefit of very few, when we could be building a stronger more sustainable future for the many?

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.
Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.
People and community centred adaptation strategies that support low income households with implementation in particular

Please prioritise the future of our children, livelihood of our communities and survival of our planet over the short term gains of very few.

Thank you and I look forward to your response.

J0253

Dear OPRED,
I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.
I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.
This is no longer an abstract future risk.
The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.
The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.
These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.
The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.
Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.
I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.
The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.
However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.
I am concerned that this approach risks obscuring the fundamental issue.
Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does

not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.
Indeed, the Jackdaw assessment itself acknowledges this causal relationship.
Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.
I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

1. The rapidly deteriorating climate conditions being experienced in the UK and internationally.
2. The increasingly well-established relationship between climate change, extreme heat and premature mortality.
3. The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
4. The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
5. The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.
6. The Government's stated intention to protect the population from the health consequences of extreme weather.
7. Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.
According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.
This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.
I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.
I would therefore ask OPRED to explain:

- Where and how the current consultation was publicised;
- Which newspapers and other media outlets carried the statutory notices;
- What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
- Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
- And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.
I am raising a public-health concern.
As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.
The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

I look forward to your response.

Yours faithfully,

Climate Genocide Act Now
10 Martyns Grove
Westcliff on Sea
Essex
SS0 9XX
[redacted]

https://www.climatecriminals.uk/

9 August 2026

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

By email: OPRED@Energysecurity.gov.uk

Dear Sir/Madam,

CGAN response to consultation on the Jackdaw gas field project

1. About CGAN

1.1 This response to the consultation is on behalf of Climate Genocide Act Now (CGAN) and focuses on the climate breakdown impacts relating to the Jackdaw project. CGAN uses UK and international criminal law in the context of mass death, mass suffering and annihilation caused by the policies that drive climate breakdown.

2. Introduction to CGAN response

2.1 The draft consultation does not include the latest UK governmental policy developments relating to climate change and recent scientific developments that reveal serious flaws in the assumptions made in the original and updated environmental statements, and the recent Scope 3 related documents.

3. Governmental policy developments not taken into account in the consultation.

3.1 The UK has voted to accept the International Court of Justice (ICJ) legal opinion on the financial liabilities of states that contribute to mass harms caused by greenhouse gas emissions.

3.2 The UN voted to adopt the ICJ 'Advisory Opinion' on the responsibilities of states relating to climate breakdown (1). The UK voted in favour of the resolution and is therefore bound by the obligations imposed by the decision.

3.3 Please particularly note Page 4 of the UN document and items 4 and 9 on the unprecedented financial liability imposed on the UK by polluting industries. The UK accepts that a financial liability exists and that any activity that makes it impossible to achieve the 1.5°C threshold target must cease.

3.4 The scale of financial liability depends on historical emissions and also any decision taken to increase greenhouse gas emissions that contribute to a global increase in temperatures beyond the 1.5°C threshold. One paper (2) has suggested the UK's liability may be in the region of £4.2 trillion. But it could be greater, particularly if government permits an increase in emissions. Drilling for new fossil fuels, when it is clear the Paris target thresholds will be breached, will very likely be seen is an aggravating factor in the ensuing legal proceedings.

3.5 The financial liability could include compensation for:

- The contribution emissions from the Jackdaw gas field make to the killing of around 1 billion people caused by reaching the 2°C threshold of global heating (3) (Pearce and Parncutt: 2°C of heating to kill around 1 billion) (See 4.9 below: Jackdaw scope 3 emissions will kill between 2,360 & 8,950 people per annum.
- The contribution emissions from the Jackdaw gas field make to the killing of 4 billion people (the Institute and Faculty of Actuaries identifies a worst case scenario where 4 billion people could be killed by 3°C of global heating (4);
- Contributing to the complete annihilation of low-lying island states due to sea level rise, with permanent displacement required of hundreds of millions of people by inundated coastal cities (5); and
- Contributing to the displacement of hundreds of millions of people caused by climate breakdown (6) (European Parliament).

3.6 At no point in over 1,160 pages of material in the consultation is there an acknowledgement of the financial liability identified by the ICJ and imposed by expansion of fossil fuel projects such as Jackdaw. There is a complete absence of awareness that new extraction will contribute to the imposition of a £multi-trillion liability upon the UK population.

3.7 Offshore Petroleum Regulator for Environment & Decommissioning must demand that Shell calculates the range of plausible costings associated with the Jackdaw project. Shell should show what they believe the compensation should be for contributing to the killing 1 billion people, potentially 4 billion people (worst case scenario at 3C of heating), what sums should be paid to those nations that have been completely annihilated and other communities permanently displaced.

3.8 The Offshore Petroleum Regulator for Environment & Decommissioning and Department for Energy Security and Net-Zero (DESNZ) must seek legal advice on the significance of taking a decision that will expose the UK to greater liability by wilfully and deliberately contributing to exceeding the 1.5C threshold established in the ICJ paper.

3.9 The ICJ paper goes beyond imposing a vast financial burden. Item 9 says: -

9. *Calls upon all States to act in accordance with their respective international obligations, noting the Court's finding in its advisory opinion that a breach by a State of any of the obligations identified by the Court in relation to climate change constitutes an internationally wrongful act entailing the responsibility of that State, that the responsible State is under a continuing duty to perform the obligation breached and that the legal consequences resulting from the commission of an internationally wrongful act may include the obligations of:*

(a) ***Cessation of the wrongful actions or omissions, if they are continuing****;*

(b) ***Providing assurances and guarantees of non-repetition, if circumstances so require.***

3.10 The implications of the UK's acceptance of the ICJ paper and ratification of the UN resolution is that government must implement an 'emergency brake' on greenhouse gas emissions, including signalling to the world no new fossil fuel facilities can be opened anywhere.

4. Governmental policy on criminal activities not taken into account in the consultation.

4.1 This group seeks to use international criminal law in the context of mass death, mass suffering and annihilation associated with the policies and activities that drive climate breakdown.

4.2 This group has proven that certain activities are illegal and those individuals responsible for them should be prosecuted under legislation enacted by parliament.

4.3 The Offshore Petroleum Regulator for Environment & Decommissioning/ DESNZ must not authorise or give approval to criminal activity.

4.4 The UK is a signatory to the Rome Statute of the International Criminal Court (7). The UK is required by the Court to bring comparable legislation within the national jurisdiction which is achieved by virtue of the International Criminal Court Act 2001 (8)

4.5 Article 25 of the Rome Statute tackles the concept of 'common purpose' where an individual may not personally kill another person, but they know their actions contribute to the harms set out in the legislation. Article 30 tackles behaviour known as 'direct intent' and 'oblique intent'. In the case of the construction of new gas fields and extraction of new gas, the government minister, and others who authorise or facilitate an increase in greenhouse gas emissions, know with absolute certainty that the emissions will contribute to mass death, suffering and annihilation. With current technologies, it is impossible this to happen without contributing to mass death, mass suffering & annihilation of low-lying island states.

4.6 It is therefore impossible to permit the expansion of fossil fuel extraction without committing a criminal act.

4.7 CGAN has proven its case to the Metropolitan Police, which is responsible for enforcing ICCA 2001. Currently the Metropolitan Police refuse to act on Parliament's legislation. Steps are in hand to force the Police to uphold the law in this area. Please also note that CGAN and other groups have climate related cases at the International Criminal Court in The Hague.

4.8 It is important to provide an indication of the number of people being killed by operations at the Jackdaw project. At 3.5 above reference is made to the killing of around 1 billion people by greenhouse gas emissions that lead to planetary heating of 2°C. Prof Richard Parncutt (University of Graz, Austria) was approached for comment. He replied:

> The quantitative relationship between CO2 emitted today and future human deaths caused worldwide by global warming has been estimated as follows:
>
> - Nolt (2011) estimated that if the lifetime emissions of the average American are ~1840 tonnes CO2e, s/he "causes through his/her greenhouse gas emissions the serious suffering and/or deaths of two future people" (p. 9). That formulation implies that 1840 tonnes CO2e corresponds to one future death. That was the first calculation of its kind and some of the premises were problematic.
> - In a top-down, semi-quantitative approach, Parncutt (2019) assumed that humanity will burn one trillion tonnes of carbon and emit ~4 trillion tonnes CO2e by 2100 (enough to cause 2°C of global warming), and that those emissions will cause roughly one billion additional premature human deaths. Therefore, an additional premature death is caused by burning ~1000 tonnes of fossil carbon ("1,000 tonne rule"), which is

equivalent to emitting 3,700 tonnes of CO2e. That is a maximum likelihood estimate that assumes a symmetrical log-linear distribution of mortality outcomes (the bell-shaped curve in Figure 1). The points on that distribution that correspond to plus/minus one standard deviation can be regarded as likely best-case and worst-case scenarios, and they correspond to roughly 10,000 and 1,000 tonnes CO2e respectively.

- Parncutt checked his prediction in various quantitative and qualitative ways. Qualitatively, it is consistent with a list of the predicted negative effects of 2°C warming in different countries by comparison to 1.5°C; that list has not changed much since 2019. Quantitatively, it is consistent with an increase in the global premature death rate in connection with poverty (global poverty mortality) from ~18 million per year currently (Pogge, 2015) to ~28 million per year for roughly a century as a result of 2°C of warming. Global poverty mortality fell steadily during the final decades of the 20th century due to a combination of economic growth and development assistance. For the past decades, it has been relatively constant; progress has been slowed down by global warming and most recently by aid cuts. In coming decades, it is predicted to rise steadily due to negative effects of global warming.
- In an economic modelling approach that considered only heat-related mortality (ignoring effects of hunger, air pollution from forest fire smoke, flooding, landslides, conflict, migration, disease migration, increased frequency of earthquakes, etc.), Bressler (2021) estimated that emitting 4,434 tonnes CO_2 (or between 1,470 and 5,850 tonnes, with 90% probability) in 2020 will cause one excess death globally between 2020 and 2100.
- In a series of recent unpublished papers, Bressler and colleagues considered this issue from different angles. Their results were consistent with his original estimate. But Bressler's estimates are conservative. They are confined to mortality caused by direct heat, for example increases in death rates during heat waves. Several other causes of death will be ultimately due to global warming. For example, crop failures will cause famine. In a first rough first estimate, Bressler's estimates could be halved to take those additional causes of death into account. His estimate would then be about 2,200 tonnes CO2e per future death, or between 750 and 3,000.

These findings imply that the mass of emitted CO2e corresponding to an additional future premature death certainly lies between 1,000 and 10,000 tonnes. No serious research has proposed a value that lies near or outside these limits. It follows that a person who wilfully and unnecessarily causes 10,000 tonnes of CO2e to be emitted causes a future death with virtual certainty, even in a best-case scenario in which global warming turns out to be much less severe than expected based on current scientific predictions. An estimate of 10,000 tonnes of CO2e per future death caused is therefore beyond reasonable doubt in the legal sense, lying way outside the ranges of uncertainty proposed by both Bressler and Parncutt, in both absolute and relative terms. Its probability of being true may be estimated at 95 to 99%. By comparison, an estimate of 4,000 tonnes corresponds to the preponderance of evidence in legal terms. The probability that it is true exceeds 50%.

References

Bressler, R. D. (2021). The mortality cost of carbon. Nature Communications, 12(1), 4467.

Nolt, J. (2011). How harmful are the average American's greenhouse gas emissions? Ethics, Policy and Environment, 14(1), 3-10.

Parncutt, R. (2019). The human cost of anthropogenic global warming. Frontiers in Psychology, 10, 2323.

Pogge, T. (2005). World poverty and human rights. Ethics & International Affairs, 19(1), 1-7.

4.9 Turning specifically to Jackdaw Gas Field:

For Jackdaw, the document: '*Further Information required under DESNZ: Regulation 12(1) Notices dated 21st July and 22nd September 2025: Part 1: Scope 3 Emissions Assessment: November 2025'* (9) page 18 provides two scenarios for scope 3 emissions. Shell estimates the likely total to be 23.6 million tonnes CO_2e but adds it could be 35.8 million tonnes CO_2e.

That implies the following scale of death globally attributable to the scope 3 emissions:

Scenario	Most likely number of deaths p/a	Minimum deaths
23.6 m/t CO_2e	5,900	2,360
35.8 m/t CO_2e	8,950	3,580

4.10 Whether 2,360 people are killed every year, or 8,950 people every year (upon exceeding the 2C threshold), either scenario represents an extreme of criminality which should be prosecuted under ICCA 2001 and international criminal law.

4.11 The calculations provided by Prof Parncutt and his colleagues should not be viewed in isolation. There are a number of organisations calculating the scale of death and suffering associated with climate breakdown. The annual Lancet 'Countdown' report (10) on the health consequences of climate breakdown should be noted. It is vital that government understands that the ill-health consequences of its policies are not confined to the elderly. All age groups will suffer. Indeed hundreds of thousands of infants are killed by the increased spread of disease every year, with a clear warning millions will lose their entire lives if governments refuse to take action to ban activities that contribute to global heating exceeding the 1.5C threshold.

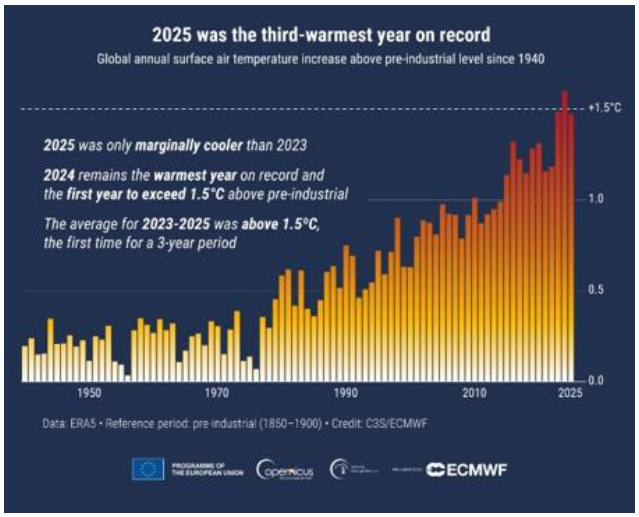
4.12 UK legislation on the criminal prosecution of individuals associated with any decision that leads to mass death do not solely extend to the Secretary of State who makes the final decision. All civil servants, staff in associated regulatory organisations and Shell staff should note the case of Irmgard Furchner, a 99 year old who was convicted of being an accessory to more than 10,000 murders in her role as a secretary at the Stutthof concentration camp. She was never accused of personally killing anyone but had undertaken secretarial work that showed support for the crimes.

5. Failure to acknowledge recent scientific developments

5.1 There are over 1,160 pages in the consultation documents but nowhere is there evidence of a grasp of the significance of recent scientific developments in relation to climate change.

5.2 In January 2026 the University of Exeter and the Institute and Faculty of Actuaries published the 'Parasol Lost' report (11) that showed global heating has accelerated and why that has happened. The report makes it clear 2°C of global heating before 2050 is likely. We must expect temperatures to be permanently over the 1.5°C threshold by 2030, with the Paris COP21 threshold, of 'well below 2°C' being exceeded in the early 2040s.

Figure 1. Heating is accelerating.



There is a plausible risk that we could see 3°C of heating by 2050.

The data here from the Copernicus service and others shows global heating has accelerated since 2015 with the years 2023, 2024 and 2025 very close to, or above the 1.5°C threshold.

2026 is expected to be close to the 1.5°C threshold, with 2027 expected to be significantly hotter.

5.3 In January 2025 the Institute and Faculty of Actuaries warned there is a plausible risk of 3°C of global heating (4). There was also an extreme scenario risk identified that this could kill 4 billion people. The report warned that the economic impacts would be extreme later in this century, with a risk of a loss of 50% of GDP between the years 2070 and 2090.

5.4 The UK Met Office reported 2,750 people were killed in the 2026 heatwaves in England & Wales (May and June 2026) (12), with 42% of those deaths being directly attributable to climate change. The Met Office also warned we must expect 45°C temperatures in England in the 2050s (13). The human and economic consequences will be horrendous, with severe damage to UK food and water supplies, tens of thousands of heat related deaths every year, and a massive reduction in the ability of people and infrastructure to work.

5.5 The grain harvest In England and Wales in the summer 2026 was the worst since the current form of records began in 1984 (14). The National Farmers Union warned the agricultural sector and government could not carry on as before, raising the grave prospect of food shortages (15).

5.6 In 2024 scientists who specialise in ocean currents issued an open letter to the Nordic Council of Ministers on the grave risk of the collapse of the AMOC ocean current (16). The current brings warm water from the equator to Northern Europe. Without that warmth and associated rainfall, the UK climate would be akin to Southern Alaska. The National Preparedness Commission warned the risk of AMOC collapse had been underestimated and said: 'Colder, drier conditions would largely wipe out crop growing in the British Isles' (17). The extreme long cold winters would cause significant damage to infrastructure, economic activity, and prevent most conventional agriculture. AMOC collapse would accelerate heating in other parts of the world, severely damaging global food production, resulting in an inability of the UK and other Northern European countries to import food.

5.7 In 2025 Prof James Hansen et al published peer reviewed research that warned of a risk AMOC shutdown could be by mid-century (18). The warning from the scientists that issued the open letter (16) is that AMOC will continue to weaken gradually, with a 50-70% chance of shutdown this century. However, if James Hansen team's prediction is correct: AMOC collapses suddenly, the UK virtually loses the ability to grow food and is unable to import food from abroad, this risks the decimation of the British population.

5.8 In 2025 the UK's Joint Intelligence Chiefs prepared a report (19) that warned of potentially appalling consequences of ecological collapse, biodiversity loss and climate breakdown. Large parts of the report were suppressed, with an edited version being released on the DEFRA website (20). The Joint Intelligence Chiefs clearly warned government ministers that the UK faces unparalleled threats to UK national security.

5.9 Neither DESNZ nor Shell have ever factored into their calculations the reality of the vast, unprecedented human and economic cost of polluting projects such as Jackdaw.

6. Conclusion

6.1 Several documents in the consultation are critically flawed and need revision. The legislative impacts in the environmental statements do not recognise the contradiction between approval of the Jackdaw project and new government policy relating to the ICJ Advisory Opinion.

6.2 There is an insurmountable contradiction between approval of Jackdaw and criminal law as enacted in ICCA2001. The most likely number of deaths annually, caused specifically by the Jackdaw project, fall between 5,900 and 8,950 per annum (deaths globally). That scale of death and suffering has never been factored into calculations by NESNZ, can never be justified and would represent a breach of the criminal law.

6.3 The Scope 3 document (Jackdaw field development responses to regulation 12(1) notice (27th March 2026) 19th June 2026: ES Ref: D/4260/2021 (February 2022), published on 19 June (21), does not include the range of extreme climate related threats that are identified in Section 5 above. The fact that global heating has accelerated, and the AMOC ocean current may pass a critical tipping point in the next 20 years, represents an existential threat to the UK population. If AMOC collapse was abrupt, as suggested by the Hansen team, the UK population would be decimated.

6.4 The correct government response to the unprecedented climate emergency is to implement an emergency stop, necessitating a dramatic reduction in the use of fossil fuels. Government must lead by example, signalling to the world that no new fossil fuel facilities can be opened anywhere.

Yours faithfully,

[redacted]

Climate Genocide Act Now

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J0255

Dear OPRED,

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The increasingly well-established relationship between climate change, extreme heat and premature mortality.

The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

The Government's stated intention to protect the population from the health consequences of extreme weather.

Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

Where and how the current consultation was publicised;

Which newspapers and other media outlets carried the statutory notices;

What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;

Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;

And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

I look forward to your response.

Yours faithfully,

J0256

Dear OPRED,

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

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These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government’s stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

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And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a care worker and a member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency. That is abundantly clear to anyone paying attention.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

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We cannot keep feeding the fire, whilst just telling people they must protect themselves better from the ever growing flames.

I look forward to your response.

Yours faithfully,

J0257

Dear OPRED,

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

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I look forward to your response.

Yours faithfully,

Friends of the Earth York

Submission to the OPRED consultation on Jackdaw

Reference: D/4260/2021

York Friends of the Earth, representing approximately 100 local members, wishes to make the following representations in response to the OPRED consultation on the proposed Jackdaw gas field. We are making this submission in collaboration with our colleagues at the North Yorkshire Climate Coalition.

At a moment when the devastating consequences of climate change are becoming ever more visible across Europe and even in our own region of North Yorkshire, we believe that any decision to approve significant new fossil fuel developments would seriously undermine the UK's long-term national interest, our international obligations and our ability to fully harness the economic opportunities emerging from the transition to a low-carbon economy, while having little or no impact on energy bills, energy security, jobs or the cost of living.

The case against the Jackdaw proposal is clear.

International commitments and credibility of UK climate leadership

Any expansion of fossil fuel extraction would directly undermine the UK's legally binding national and international climate commitments (including the Climate Change Act and the Paris Agreement).

In this context, we also note the joint letter recently signed by the UK Foreign Secretary and the Spanish Foreign Minister, explicitly acknowledging that climate change is 'now a national security emergency facing Europe and threatening our way of life', The letter reaffirms UK support for the UNFCCC and stresses the importance of fulfilling the international commitments contained in the Paris Agreement, 'underlining in particular the urgency of increasing global efforts to limit the increase in temperature to 1.5°C above pre-industrial levels'.

Yet, drawing on the latest climate science, highly authoritative and independent analyses (including reports by the Climate Change Committee, the International Energy Agency and the International Institute for Sustainable Development) show that new gas (and oil) fields are incompatible with pathways that keep global warming within safe limits.

Furthermore, any decision to approve Jackdaw would send a very damaging signal. The UK has long been regarded as a climate leader, but its future credibility among international partners depends on aligning domestic decisions with its stated ambitions. Authorising new fields risks weakening diplomatic influence at a time when global cooperation is essential.

Shell's updated Environmental Statement for Jackdaw

In our view, Shell's assessment of the field's projected downstream (Scope 3) emissions in its updated Environmental Statement is misleading, methodologically flawed and non-compliant with legal requirements.

It sets projected emissions (nearly 36 million tonnes of CO_2 equivalent over the project's lifetime) from the field in the context of the huge volume of global fossil fuel projects and concludes that the emissions are therefore ''minor adverse and not significant'. This is misleading as there is an obvious difference in scale between individual projects and global emissions.

Reflecting the fact that the global climate responds to cumulative GHG volumes, the supplementary guidance issued by DESNZ for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects clarifies that Environmental Statements must consider the cumulative effects of the proposed project with other existing and planned future projects, in a global context'.

The Environmental Statement is non-compliant with the applicable EU EIA Directive, reinforced by the UK Supreme Court's *Finch* ruling, as it fails to:

- Assess cumulative combustion emissions from all national petroleum activities.
- Assess compatibility with remaining 1.5°C carbon budgets.
- Quantify indirect climate impacts (health, ecosystems, infrastructure).

The tie-back and displacement arguments

As noted by Professor Kevin Anderson in an open letter to the Prime Minister, the argument that permitting Jackdaw (and Rosebank) would not technically breach Labour's previous commitment to stop issuing new oil and gas licences is 'immaterial to the physics of climate change', which 'responds to the cumulative quantity of greenhouse gases released into the atmosphere. If these developments proceed, they

will ultimately result in the release of hundreds of millions of tonnes of additional carbon dioxide.'

Research conducted by Uplift highlights that any displacement of imported LNG would be minimal (approx. 2% for Jackdaw). By contrast, Government and independent energy research cited by Carbon Brief shows that expanding renewable energy capacity (such as offshore wind) would displace significantly larger volumes of imported LNG than new North Sea drilling can achieve.

Environmental and social costs

The extreme weather events unfolding across Europe and worldwide this summer illustrate the urgency of accelerating the shift away from reliance on burning fossil fuels. Wildfires have devastated large areas of Europe, displacing communities, destroying ecosystems, and placing enormous strain on emergency services. These fires are widely and authoritatively reported, e.g. in the 26 June report by the World Weather Attribution Group, as being intensified by prolonged heatwaves linked to climate change, and they serve as a stark reminder of the escalating risks associated with continued fossil fuel dependence, including prolonged drought, excess heat-related deaths, the widespread destruction of habitats and cherished landscapes, the drying out of soils, and not least large-scale crop disruption and the associated risk to food supplies.

With specific regard to excess mortality, we note that the projected scope 3 emissions associated with Jackdaw equate to approximately 8,000 human deaths from climate effects before 2100, according to the IPCC-derived 'mortality cost of carbon' or 'thousand tonne rule'. In financial terms, based on Greenpeace estimates and the Treasury Value of Prevented Fatality (VPF, £2 million per death), the value of not going ahead with Jackdaw is over £16.1 billion.

Any properly evidence-based decision must demonstrate strategic foresight by taking full account of these actual, projected and estimated impacts and costs.

Economic rationale and cost of living

The economic rationale for new extraction is weak. The recent CBI report highlights the strength and resilience of the UK's net-zero economy, which grew significantly even during periods of wider economic stagnation. According to the report, sectors aligned with the transition – renewable energy, green manufacturing, clean tech and low-carbon services – are expanding rapidly, attracting investment, creating skilled jobs and strengthening the UK's global competitiveness. This evidence suggests that permitting further extraction from a largely depleted basin – with minimal job creation benefits in the case of Jackdaw – would be not only environmentally damaging but economically short-sighted, misdirecting crucial investment away from the low-carbon sector.

Equally, greenlighting the Jackdaw project would offer no meaningful relief to UK consumers. As widely noted by energy analysts, the extracted resources would be sold to the highest bidder on international markets, with prices determined globally. As

the highly respected economist Mariana Mazzucato puts it, ‘Drilling the North Sea won’t help people across the UK struggling with their energy bills’. Nor would the resulting production enhance energy security in a way that compares to accelerating investment in renewables, storage and efficiency.

A 2025 report by the LSE’s Grantham Institute finds that any decision to approve the development of Jackdaw (and Rosebank) would ‘lead to confusion about the direction of travel and undermine investment into the clean transition. This might be justified were there to be clear economic benefits but, in fact, such investment risks generating low returns and would be against the UK’s strategic economic self-interests’.

We agree with the report’s conclusions that approval would:

- lock in further reliance on volatile oil and gas markets while losing out on productivity and efficiency gains of domestic clean energy
- risk putting money into stranded assets which will require taxpayers to bail out decommissioning costs
- distract from the growth opportunity of the 21st century
- fail to capture broader benefits such as cleaner air
- undermine the UK’s credibility, i.e. its ability to convince other countries to act.

In conclusion, for all these reasons – environmental, social, human, economic and diplomatic – we believe the Jackdaw proposal should be rejected and that Government should instead focus on accelerating the UK’s transition to a clean, secure and future-proof energy system while ensuring that the current oil and gas workforce is offered all the support needed to find high-quality and well-paid jobs in the clean energy sector.

Yours sincerely,

York Friends of the Earth

August 2026

J0259

Dear OPRED,

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The increasingly well-established relationship between climate change, extreme heat and premature mortality.

The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

The Government's stated intention to protect the population from the health consequences of extreme weather.

Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

Where and how the current consultation was publicised; Which newspapers and other media outlets carried the statutory notices; What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond; Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation; And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a Specialist Nurse and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0260

Dear all at OPRED and DESNZ,

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

As a medical professional, I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

- The rapidly deteriorating climate conditions being experienced in the UK and internationally.
- The increasingly well-established relationship between climate change, extreme heat and premature mortality.
- The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
- The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
- The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.
- The Government's stated intention to protect the population from the health consequences of extreme weather.
- Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

- Where and how the current consultation was publicised;
- Which newspapers and other media outlets carried the statutory notices;
- What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
- Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
- And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I am raising these concerns because I believe they are linked to a serious risk to public health.

As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the climate and health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, disruption to food and water security, and disproportionate harm to older people, children and those already suffering health inequalities.

In this context, I'm concerned that an assessment of Jackdaw which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as

separate considerations: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0261

Dear OPRED,

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from

the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The increasingly well-established relationship between climate change, extreme heat and premature mortality.

The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

The Government's stated intention to protect the population from the health consequences of extreme weather.

Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

Where and how the current consultation was publicised;

Which newspapers and other media outlets carried the statutory notices;

What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;

Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;

And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats

their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0262

Dear OPRED,

I am writing to object to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

It is extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

Can OPRED explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The increasingly well-established relationship between climate change, extreme heat and premature mortality.

The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

The Government's stated intention to protect the population from the health consequences of extreme weather.

Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The

Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

Where and how the current consultation was publicised;

Which newspapers and other media outlets carried the statutory notices;

What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;

Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;

And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a doctor and member of the public who has been following the climate crisis for decades, I am increasingly alarmed by the apparent disconnect between the scale of

the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency noting that the NHS has recognised the health emergency. The consequences of continued fossil fuel use are not confined to atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care

services, disruption to food and water security, and disproportionate harm to older people, children and those already living with health inequalities. In this context, I'm concerned that an assessment of Jackdaw which does not give sufficient prominence to these human health consequences risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate. Protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0263

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive issue.

However, the assessment characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing. Several tipping points come nearer with each fraction of a degree of warming.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

- The rapidly deteriorating climate conditions being experienced in the UK and internationally.

- The increasingly well-established relationship between climate change, extreme heat and premature mortality.

- The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

- The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

- The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

- The Government's stated intention to protect the population from the health consequences of extreme weather.

- Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

- Where and how the current consultation was publicised;

- Which newspapers and other media outlets carried the statutory notices;

- What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;

- Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;

- Whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As an immunologist, health expert and member of the public who has been following the climate crisis with increasing concern over many years, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe,

and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined to atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, disruption of food and water security, disproportionate harm to older people, children, and those already living with health inequalities, and increasing risk of pandemic infectious diseases.

In this context, I'm concerned that an assessment of Jackdaw which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate considerations; protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0264

Dear OPRED,

I am a London-based GP and am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than realising the escalating threat it poses to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded. These statistics translate into preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I can't see how the continuing development of new fossil-fuel infrastructure can be reconciled with the Government’s stated commitment to protecting public health and responding to climate change.

Jackdaw's Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of its products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor. However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines. I am concerned that this approach risks obscuring the fundamental issue. Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing. Indeed, the Jackdaw assessment itself acknowledges this causal relationship. Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

- The rapidly deteriorating climate conditions being experienced in the UK and internationally.
- The increasingly well-established relationship between climate change, extreme heat and premature mortality.
- The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
- The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
- The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.
- The Government's stated intention to protect the population from the health consequences of extreme weather.

- Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health. I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

- Where and how the current consultation was publicised;
- Which newspapers and other media outlets carried the statutory notices;
- What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
- Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
- Whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds. I am raising a public-health concern.

As a doctor I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development. The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to

determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. An assessment of Jackdaw which does not give sufficient prominence to these human health consequence risks understating the true significance of the project.

Protecting the population from climate change must be regarded as a fundamental public health responsibility.

Response to the Consultation (Ref: PRA/357): Why Jackdaw matters

Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning (OPRED)
Department for Energy Security & Net Zero (DESNZ)
AB1 Building
Crimon Place
Aberdeen AB10 1BJ

Email: OPRED@energysecurity.gov.uk

The case at a glance

- Gas remains essential for the UK's total energy and electrical (power) systems. Natural gas accounted for 35% of UK total energy demand and 27% of our electricity needs in 2025, oil and gas combined accounted for over 75%, while 85% of British homes are connected to the gas grid to meet heating and cooking needs.
- UK was self-sufficient for gas (and oil) from the late 80s to the early 2000s, from which time we have seen a decline and increasing gap between what we consume and what we produce, a gap we need to fill from somewhere.
- Production is falling faster than demand. UK gas production fell 3.4% in 2025; demand was broadly stable, declining by only 1.0%.
- Imports already provide around half of supply. Norway provided 40% of UK gas supply in 2025, while US LNG provided 13%.
- Jackdaw is material and deliverable. All of its gas will go into the UK gas network. The operator, Adura estimates it could provide more than 6% of UK gas supply by this winter – equivalent to the annual heating needs of 1.4 million homes – with gas entering the UK network through existing infrastructure.
- The source of residual gas demand matters. The gas produced from the Jackdaw field carries significantly less carbon emissions than Liquified Natural Gas (LNG) that the North Sea Transition Authority (NSTA) calculated has almost four times the average supply-chain carbon intensity of producing gas from the UKCS.

1. Supply and demand

The fundamental problem is that UK gas production is falling faster than gas demand. Production dropped by 3.4 per cent in 2025 while demand was broadly stable, down only one per cent. If that gap is not filled by new domestic supply, it must be filled by imports. So, given we still need gas, the key questions are: where do we get it from and what's the justification for doing so?

2. Jackdaw is material

Six per cent of UK gas supply is not marginal; it is material. All of Jackdaw's gas would enter the UK network through existing infrastructure. Adura estimates it could supply the equivalent of 1.4 million homes. In other words, over half the homes in Scotland could be served by it when Jackdaw is at peak production. In a market where domestic output is declining, dismissing that volume as insignificant ignores how energy systems actually work.

3. Why Norway cannot be the whole answer

Norway is a vital and dependable supplier, and its piped gas has a lower upstream carbon footprint than UK production. But Norway is already supplying much of Europe and its production is expected to decline. Furthermore, we rely primarily on one pipeline, Langeled, which makes it a critical point of failure. Norwegian supply cannot expand indefinitely to cover future UK shortfalls, and should anything befall Langeled, we would lose half our gas supplies immediately.

4. The LNG alternative

When Norwegian pipeline supply cannot fill the gap, the fallback is LNG bought from overseas. We currently receive that from eleven countries, but the largest contributor is now fracked (shale) gas from the United States. In 2025, the United States supplied 76% of Britain's LNG imports. Cargoes can go to the highest bidder, exposing the UK even further to international competition and geopolitical shocks. Domestic production gives greater certainty over the physical source of our gas, even though no single field can set the global wholesale price.

5. The emissions comparison

Gas creates the same combustion emissions wherever it is produced, so the relevant comparison is how the gas we will still use reaches the consumer. LNG has to be liquefied, shipped over long distances and regasified. The NSTA finds that importing LNG has, on average, almost four times the supply-chain carbon intensity of producing gas on the UK Continental Shelf. Refusing Jackdaw would not make gas demand disappear; it would risk replacing domestic gas with a higher-emissions supply chain, something that is worse for the global climate.

6. Gas and renewables

This is not a choice between Jackdaw and renewables. Renewables should continue to grow as fast as the system can accommodate, but gas still supplied over a quarter of UK electricity generation in 2025 and a much larger share, which often exceeds 50% during periods of low wind and no sunlight. Until battery storage, networks and other low-carbon capacities can cover those periods at scale, gas remains a critical source of system resilience.

7. Existing infrastructure and jobs
Jackdaw is a tie-back to the existing Shearwater hub and the St Fergus terminal. Maintaining throughput matters: once terminals and pipelines close, remaining discoveries can become stranded and capability is lost, something we have already seen in other parts of the North Sea. Consenting Jackdaw supports not only its own production, but the resilience of strategically important North Sea infrastructure and the skilled workforce around it.

8. Risk of stranded assets
Theddlethorpe is a warning of what can happen when infrastructure closes while gas remains in connected fields. When the terminal and the Caister Murdoch System shut in 2018, production from the Ketch Field ceased with gas still stranded in the field. We should not repeat that in the central North Sea. If hubs and pipelines are allowed to wither and closed before developments such as Jackdaw come onstream, valuable domestic resources can be stranded and may never be recovered economically."

9. The wider national interest
As well as providing energy and hence, national security and lower emissions, every unit of gas produced domestically supports UK employment, increased tax receipts and the balance of payments rather than transferring all of that economic value overseas. Those benefits do not replace the climate test, but they belong in any honest assessment of the national interest.

10. The consent decision
Taking the evidence in the round –declining production, persistent demand, import exposure, energy and nationals security, higher LNG supply-chain emissions, infrastructure, tax revenue generation and jobs – Jackdaw should receive environmental consent. The alternative is not a gas-free Britain; it is a Britain that imports more of the gas it continues to need, which requires reliable supply routes and carries a higher carbon intensity.

J0266

Dear secretary of state,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's

offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0267

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one

environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

- The rapidly deteriorating climate conditions being experienced in the UK and internationally.
- The increasingly well-established relationship between climate change, extreme heat and premature mortality.
- The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
- The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
- The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

- The Government's stated intention to protect the population from the health consequences of extreme weather.
- Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

- Where and how the current consultation was publicised;
- Which newspapers and other media outlets carried the statutory notices;
- What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
- Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
- And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined to atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess deaths during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, disruption to food and water security, and disproportionate harm to older people, children and those who already live with health inequalities. In this context, I'm concerned that an assessment of Jackdaw which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate considerations: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0268

09/08/26

Your Ref: D/4260/2021

Dear OPRED,

I am writing to object to the Jackdaw gas field development.

I copy and paste a letter already sent to you by a colleague, below. I too am a health professional and agree with all the points and with all the concerns stated by my colleague.

Additionally, I point out to you that latest IPSOS MORI poll, dated 7.08.26, shows 74% of people are concerned about climate change following 'heatwave summer'.

The poll also shows that:

"Despite widespread concern over future weather patterns, public confidence in political solutions remains low" my italics.

The public are joining the dots between the hot dry summer and global heating, and expect more weather disruptions to come.

People are joining the dots in spite of inefficient or even obstructive media reporting. This causes a sense of disconnect, as many think they are in a minority in regard to their concerns whereas in fact they are in the majority.

The mental health of children and young people is particularly adversely affected, as shown in this recent government report:

https://www.gov.uk/guidance/climate-change-and-the-mental-health-of-children-and-young-people

The above government report goes even further, linking to an authoritative study published in The Lancet in 2021 showing that lack of appropriate government action causes some children a crisis of confidence in government and authority figures that affects their functioning and development and can drive thoughts of self-harm and suicide.

The majority of people are not hoodwinked by fossil fuel lobbying and do not feel secure. The government can make a start to improve people's safety and their confidence in this government by refusing permission for the Jackdaw field development.

We need a speedy transition to a safe future and the Jackdaw field development has no place in it.

As a retired GP I also fully endorse and sign this separate letter:

Dear OPRED,

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many,

rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

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These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions

adequately reflects:

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Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.
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Which newspapers and other media outlets carried the statutory notices;
What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
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And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.
I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made

about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

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I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jackdaw which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

I look forward to your response.

Yours faithfully,

J0269

I oppose new fossil fuel extraction because it will contribute to the climate crisis. The earth is getting hotter and people and wild life are nearly unable to cope. With out plants, because they ve burnt we will have no oxygen or food. This is a crisis. We need to do things in a different low carbon low energy way. Using Fossil fuels is contributing to the crisis. No more extraction.

J0270

Dear secretary of state,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental

impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

J0271

I am an energy scientist with a PhD in Sustainable Battery Materials. I am writing to object in the strongest possible terms to the Jackdaw gas field development. I would also like to raise serious concerns about whether the current assessment and

consultation process has been sufficiently accessible, and if it adequately reflects the climate emergency we are now experiencing.

The environment is not just one consideration. Our entire economy, lifestyles and lives depend on it. I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population. It has not rained in my home in many weeks now, and this is no longer an abstract future risk, nor does it feel like one.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe. The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded. These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor. However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines. I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing. Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The increasingly well-established relationship between climate change, extreme heat and premature mortality.

The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

The Government's stated intention to protect the population from the health consequences of extreme weather.

Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

Where and how the current consultation was publicised; Which newspapers and other media outlets carried the statutory notices; What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond; Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation; And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds, as I am raising a public-health concern.

As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development. The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself. At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

I look forward to your response. As someone in their late 20s, I am terrified for what the future will look like at 2050, having seen the summer we are currently living through in 2026.

J0272

I write to you as a biologist and concerned citizen, in objection to the proposed Jackdaw Field development.

We are in a state of Climate Emergency that has only accelerated since it's Parliamentary declaration in 2019. It is hard to comprehend how my government could give their blessing to any further fossil-fuel infrastructure or activity within our borders. The Scope 3 emissions would be massive, and an insult to those who worked hard for our country's supposed reputation as a leader in climate action.

The climate emergency is real, is killing people and threatening our whole way of life - many civil servants and even parliamentarians understand this, but too many seem to have missed the seriousness of the situation.

While the country, and the whole planet, is suffering severe climate distortion is a disgraceful time to rush out a so-called consultation with such a ridiculously tight deadline for response.

This will be a short email, because the objections are so simple. They've already been met with complex and misleading lines about energy security, the economy and even jobs, but none of these hold water. The lobbying capacity of the fossil fuel industries seems overwhelming, but I'm hoping that enough of you will hold the line.

J0273

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The increasingly well-established relationship between climate change, extreme heat and premature mortality.
The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.
The Government's stated intention to protect the population from the health consequences of extreme weather.
Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.
I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

Where and how the current consultation was publicised;
Which newspapers and other media outlets carried the statutory notices;
What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.
I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0274

Dear Secretary of State,

I would like to register my firm opposition to the approval of the Jackdaw Field Development licence as per the above consultation reference.

Firstly, the development will create millions of tonnes of additional CO2 emissions at a time when we need to be scaling fully back on the burning of fossil fuels. Not to mention being in direct conflict with the government's manifesto and the Paris agreement. We have and are still experiencing the hottest summer on record, with terrifying climate crises emerging; wildfires, countrywide drought, and thousands of excess deaths. The global south have been experiencing these effects for far longer and it is only set to get worse.

The argument that this field accounts for a very small proportion of global CO2 emissions should be deemed irrelevant; the UK should be forging our way forward as world leaders in green and sustainable technologies/energy, approving an oil/gas field sends completely the wrong message - we must be leading by example; and seeking innovative ways to combat the growing climate crisis.

Secondly, this licence will not reduce energy costs for us the consumer in the UK, and it creates a truly negligible number of jobs.

Our children and future generations need a habitable world to inherit. Approving this licence is in direct contravention to this notion.

J0275

I am writing to strongly oppose the Jackdaw development because of the enormous risks to life and health of our population if we do not take sufficient measures to reduce carbon emissions urgently.

I understand that the scientific experts at the IPCC have recommended that there can be no new oil and gas extraction if we are to meet the Paris commitments and stay

within 1.5 degrees of warming. Already we are seeing huge a rapid changes to our climate which is risking our food security as crops start to fail due to drought. What will the likely future be in 10 or 15 years from now when my young children are entering adulthood? I urge you to take the correct course of action and to prevent catastrophic loss of all that is worth protecting in our world.

J0276

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the

health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

- The rapidly deteriorating climate conditions being experienced in the UK and internationally.
- The increasingly well-established relationship between climate change, extreme heat and premature mortality.
- The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
- The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
- The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.
- The Government's stated intention to protect the population from the health consequences of extreme weather.
- Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

- Where and how the current consultation was publicised;
- Which newspapers and other media outlets carried the statutory notices;
- What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
- Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
- And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As an engineer and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0277

I am writing to formally log my objection to the environmental statement submitted by Adura for the Jackdaw gas field. **I strongly urge the Secretary of State and the regulator to deny final consent for this development.** The physical reality of climate breakdown, combined with the project's flawed economic logic, renders this field entirely incompatible with the UK's statutory and moral obligations.

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1. Extreme Weather and Systemic Food Insecurity

We are witnessing climate collapse in real time. Europe and the UK are currently locked in a devastating pattern of extreme, compounding heatwaves.

- **Immediate Agricultural Failure:** These prolonged heat spikes are actively decimating agricultural yields. If we continue on this path, our autumn harvests will decline sharply, threatening to leave supermarket shelves as critically bare as they were during the peak supply disruptions of the pandemic.
- **Compounding Catastrophes:** The climate crisis does not stop at heatwaves; it guarantees a future of severe floods that destroy infrastructure, wipe out crops, and inflict widespread economic misery on UK communities.

2. Uninsurable Markets and Macroeconomic Upheaval

We are accelerating toward a threshold where climate-driven damages will distort everyday life. The resulting macroeconomic instability will disrupt every household and business.

- **The Collapse of Insurance:** If global carbon emissions are permitted to keep rising, the financial foundations of our society will fracture. We are rapidly moving toward an uninsurable world, where standard property, agricultural, and business protections cease to exist because the risks of extreme weather become too high to underwrite.

3. Violation of Legally Binding Net Zero Obligations

Mankind must completely cease the extraction and combustion of oil and gas.

- **The Legal Disconnect:** Approving a massive new extraction project like Jackdaw is fundamentally at odds with the UK's legally binding net zero targets. Greenlighting decades of fossil fuel pollution while legally committed to decarbonisation is an irreconcilable policy contradiction. Every new cubic metre of gas we extract pushes the global biosphere closer to irreversible tipping points.

4. Flawed Energy Security and Economic Arguments

The justifications put forward by the oil and gas lobby do not withstand scrutiny:

- **Zero Impact on Domestic Bills:** The gas extracted from the Jackdaw field will be owned by private corporations and traded on international markets. It will not lower household energy bills by a single penny, nor will it insulate the UK economy from geopolitical supply shocks or global price volatility.
- **Profits Private, Costs Public:** The economic framework of this development heavily penalises the taxpayer. Due to generous investment allowances and tax loopholes, the vast majority of the profits will flow directly to the developers. Meanwhile, the public purse is left absorbing massive foregone revenues and future decommissioning liabilities.

Conclusion

The updated Environmental Impact Assessment confirms that the lifetime combustion of Jackdaw's reserves will release millions of tonnes of carbon dioxide into our shared atmosphere. We cannot afford to prioritize short-term corporate gains over a liveable ecosystem and a stable economy.

Do NOT Grant Consent for Jackdaw.

J0278

I believe that allowing this field to start production would be advantageous - the recent UK weather conditions are further evidence of the urgent need to reduce global greenhouse gas emissions. My reasoning is:-

1. Piped natural gas has lower overall emissions than imported LNG. Until Europe no longer needs to import LNG, there is a clear positive environmental impact to satisfying legacy needs with additional piped gas supplies.
2. UK and European operations will be better managed and regulated than some extraction activities elsewhere in the world, and penalties can be readily applied where needed to ensure regulatory compliance, particularly to avoid avoidable methane emissions, a powerful and long lived greenhouse gas.
3. The resulting taxation revenue can be used to fund low carbon projects, for example the reduction of national grid reconfiguration levies on the UK electricity price, thus encouraging the move to heat pumps, electric vehicles and other similar proven technologies.

Also of course, in the short term, there is likely to be a worldwide shortage of LNG in northern hemisphere winters due to disruption in the middle east, both shipping and LNG production facilities. Piped gas to UK/Europe from a politically stable region will help to mitigate those shortages.

J0279

I am contacting you to provide my support for the Jackdaw development under Public Consultation reference 4260/2021.

As a professional engineer within the oil and gas industry I am fully aligned with the value proposition outlined by Adura regards to this development. In particular, I believe

the maintaining highly skilled jobs and the tax revenue that these derive is of significant importance to the UK and the North East

J0280

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared

to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Jackdaw Field Development Consultation Response

Representation in Support of Consent (Reference: D/4260/2021)

[redacted]
[redacted]
[redacted]
tel: [redacted]
[redacted]

To the Secretary of State and OPRED,
I am writing in support of the Jackdaw Field Development and respectfully request that consent be granted following consideration of the Environmental Statement and further information submitted under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

Economic Benefits and Employment
The Jackdaw development represents a significant investment in the UK Continental Shelf and in the wider UK energy economy. The project has already required substantial capital investment, supporting employment across engineering, fabrication, offshore construction, logistics, marine services and specialist supply chains throughout the United Kingdom.
The project provides economic benefits not only through direct employment but also through the preservation of highly skilled technical capabilities that have been developed over many decades in Aberdeen and across the wider UK offshore energy sector. Maintaining these capabilities is important for the future competitiveness of the UK energy industry and for supporting the development of emerging low-carbon technologies that will rely on many of the same engineering and project delivery skills.

Energy Security and Immediate Supply Benefits
The most compelling argument in favour of Jackdaw is its contribution to UK energy security. The United Kingdom continues to rely heavily on natural gas for domestic heating, electricity generation, industrial processes and the manufacture of a wide range of products essential to modern life.

Unlike many energy developments that may take years to progress from approval to production, Jackdaw is already substantially developed and effectively production-ready. The platform, pipeline and associated infrastructure have been installed, drilling activities have been completed, and the project is capable of making an immediate contribution to UK gas supplies once consent is granted and production commences. Public information indicates that Jackdaw has the potential to provide a material proportion of UK domestic gas production and could supply sufficient gas to heat more than one million homes. The project is connected to existing infrastructure and will bring gas ashore through established facilities at St Fergus in Aberdeenshire. This means that the benefits of enhanced domestic supply, reduced import dependence and improved energy security can be realised in the near term rather than at some point in the distant future.

The importance of additional domestic gas production has been highlighted by recent disruptions and constraints within global energy markets. European energy security has been significantly affected by reduced Russian gas supplies, while global LNG markets have are dependent on a relatively limited number of exporting nations and are currently being disrupted by closure of the strait of Hormuz. The UK therefore benefits from maintaining secure domestic sources of supply which are less exposed to geopolitical risks, infrastructure disruptions and international market volatility.

While the UK continues its transition towards lower-carbon energy sources, maintaining access to secure domestic gas supplies remains essential. Natural gas continues to play a critical role in supporting electricity system reliability and providing energy during periods when renewable generation is insufficient to meet demand.

Climate Considerations and Global Emissions
I acknowledge that development of the Jackdaw field will result in additional production-related emissions and that the assessment of Scope 3 emissions forms an important element of the consultation process.

However, it does not automatically follow that refusing consent would reduce global greenhouse gas emissions by an equivalent amount. As long as demand for natural gas exists, global markets will seek alternative sources of supply. Restricting UK production without an equivalent reduction in demand risks increasing reliance on imports rather than reducing overall consumption.

The more effective long-term policy objective is to reduce demand through improvements in energy efficiency, electrification, technological innovation and the deployment of low-carbon alternatives, while ensuring that unavoidable remaining demand is met through the most responsibly produced sources available.

Domestic Production versus Imports
It appears inconsistent to oppose domestic gas production while continuing to import substantial quantities of natural gas from overseas.

The UK Continental Shelf operates within a highly regulated environmental and safety framework. Domestic production benefits from direct regulatory oversight and transparency. In many cases, imported gas may involve additional transportation emissions associated with liquefaction, shipping and regasification.

Where demand continues to exist, it is reasonable to favour gas produced under robust UK environmental standards over increased reliance on imports from international suppliers whose environmental standards and carbon intensities may differ significantly.

Investor Confidence and Regulatory Stability
Jackdaw is a mature project that has undergone many years of planning, assessment and regulatory scrutiny. Significant investment has already been committed, infrastructure has

been installed and development activities have largely been completed. Stopping this project at this late-stage risks serious reputational damage to the UK as an investment destination.

Providing a stable and predictable regulatory environment is essential to maintaining investor confidence in the United Kingdom. Investors in major infrastructure projects must be able to rely on established regulatory processes and expect that projects meeting regulatory requirements will receive fair and consistent treatment.

Decisions which undermine confidence in long-established approval processes risk extending beyond a single project and may influence investment decisions across a range of sectors, including both conventional and renewable energy developments. The UK's reputation as a stable investment destination depends upon predictable regulation and transparent decision-making.

Conclusion

In my view, Jackdaw represents a sensible and proportionate approach to balancing In my view, Jackdaw represents a sensible and necessary development that balances environmental responsibilities with the practical realities of the United Kingdom's continuing energy needs.

The UK remains dependent on natural gas for heating, power generation, industrial production and energy system resilience. Refusing consent for Jackdaw would not eliminate that demand. Instead, it would increase reliance on imported gas at a time when international energy markets remain exposed to geopolitical uncertainty, constrained supply and heightened competition for LNG cargoes. By contrast, Jackdaw can make an immediate and meaningful contribution to domestic energy security through infrastructure that has already been substantially developed and invested in.

The project supports skilled UK jobs, strengthens domestic supply chains, contributes tax revenues, reinforces investor confidence and provides a lower-risk source of supply than increased dependence on overseas imports. Importantly, it enables the UK to meet continuing demand from a domestic resource developed under one of the world's most rigorous environmental and regulatory regimes.

What particularly distinguishes Jackdaw from many other energy developments is that it is no longer simply a proposal for future supply. The platform has been installed, the export infrastructure is in place, drilling activities have been completed, and substantial capital has already been committed. The project is therefore capable of delivering tangible benefits to UK consumers and businesses in the near term rather than many years into the future.

For these reasons, I strongly support the granting of consent for the Jackdaw Field Development. Given the advanced stage of the project, the significant investment already committed, and the clear public interest benefits arising from enhanced energy security, economic resilience and reduced dependence on imported gas, I believe approval is both justified and firmly in the national interest. I respectfully urge the Secretary of State to agree

to the grant of consent and enable Jackdaw to commence production without further delay so that its economic and energy security benefits can be realised as soon as possible.

Yours faithfully,

[redacted]

J0282

I welcome the opportunity to respond to OPRED's public consultation on the Rosebank and Jackdaw offshore energy projects. My response draws on publicly available evidence as well as my own experience living and working in the North East of Scotland and working across both Oil and Gas and on delivering the energy transition. The Rosebank and Jackdaw developments represent strategically significant investments in the UK's domestic energy system and will play a vital role in supporting national and European energy security, economic resilience, and the managed transition to a lower-carbon future by providing a cleaner energy system than the alternatives available to us.

The UK continues to rely heavily on oil and gas, with up to 78% of our energy demand supplied by oil and gas, according to the governments own data (The UK energy system, Commons Library). Indeed, independent forecasts indicate that demand equivalent to up to 15 billion barrels will be required by 2050, primarily due to our reliance on these fuels for heating and transport, including the transportation of essential goods. Without new domestic production, this demand will increasingly be met through imports—often with significantly higher associated emissions. OEUK notes that imported oil and gas can carry a carbon footprint up to four times greater than UK-produced resources. This is particularly true of liquified natural gas (LNG), which is expected to supply an increasing proportion of our energy needs as UK production declines because Norwegian supply to the UK is already close to pipeline capacity and production limits. In addition to carrying a significantly higher extraction and transportation footprint, LNG primarily comes from Qatar, the USA and Russia all of which have inferior environmental and safety standards and regulation relative to the UK. This reliance leaves us exposed to geopolitical events, such as the current war in the Persian Gulf, to the whims of dictators and demagogues and, disturbingly, it also leaves us funding Russian aggression in Europe, bringing war and instability almost to our doorstep and further exacerbating the cost of living crisis. Furthermore, the nuances of gas trading and delivery mean that the cost of imported LNG is higher than that of UK produced natural gas, meaning that when gas is setting the cost of electricity (around 60% of the time), LNG in the system sets a higher electricity price than UK produced natural gas. The USA is by far our largest supplier of LNG, increasingly so since the start of the Iran War and this LNG is particularly harmful to the environment, being largely produced from onshore fracked gas, which is energy intensive and carries increased risk of harm due to their onshore location and often shallow extraction depths. For these reasons, it is imperative that we do not artificially accelerate the decline of UK production and that as much of our oil and gas demand as possible is met by UK production during the period in which it is required; Rosebank and Jackdaw are part of the solution to this.

Rosebank and Jackdaw together are expected to provide around **10% of UK domestic natural gas production** and **10% of UK oil output** at peak. In a context where UK gas production currently meets only 39% of national demand, these projects offer a meaningful buffer against rising import dependency. The development of these fields will:

- Generate **£28.7bn in Gross Value Added** over their lifespans.
- Deliver **£9.1bn in supply-chain activity** across the UK.
- Provide **£1.4bn in tax revenues** before the end of the current Parliament, rising to **£3.8bn** by 2034.
- Support **3,500 jobs at peak construction** and **880 long-term operational roles**, with average salaries of approximately £85,850 - **this represents income tax and NI (employer and employee) contributions of £37,000 (england) - £40,000 (scotland) per employee per annum on average**.
- Create **at least 125 apprenticeships**, strengthening the future workforce for both offshore energy and the wider transition and providing good vocational training opportunities for young people.

These benefits will be felt across multiple regions, including north-east Scotland, Fife, the Highlands, north-east England, and Shetland—where Rosebank activity is already supporting Lerwick Port. Nearly 200 contracts have already been placed with UK supply-chain companies.

Both projects are designed to use **state-of-the-art extraction methods**, reducing operational emissions to around **half the North Sea average**. While oil and gas production is not itself a net-zero activity, domestic production with lower emissions intensity is materially preferable to higher-carbon imports as outlined at the beginning of this submission. The Rosebank and Jackdaw projects therefore support the UK's climate objectives by:

- **Minimising lifecycle emissions** associated with unavoidable oil and gas use.
- **Sustaining the workforce and supply chain** required for offshore wind, CCS, hydrogen, and other transition technologies.
- Providing **stable domestic energy supply during periods of variable renewable generation**.

This consultation follows two years of uncertainty despite prior government approval (Rosebank in 2023, Jackdaw in 2022). OEUK highlights that this uncertainty has already stifled investment and contributed to increased reliance on imports. A timely and positive regulatory decision would demonstrate that the revised regulatory regime is functioning effectively and restore investor confidence in the UK Continental

Shelf. Furthermore, it would help to unlock the wider pipeline of **111 offshore energy projects** needed to maintain domestic production and support the transition.

I recognise OPRED's critical role in ensuring that offshore developments meet stringent environmental standards. Based on the evidence available, the Rosebank and Jackdaw proposals are aligned with best-practice emissions reduction technologies, responsible operational planning and long-term commitment to environmental management and decommissioning.

Given the UK's ongoing need for oil and gas during the transition period, approving lower-carbon domestic projects is environmentally preferable to increasing imports with significantly higher emissions intensity.

In conclusion Rosebank and Jackdaw represent essential components of a secure, lower-carbon, economically beneficial UK energy system. Their approval would: strengthen national energy security; reduce reliance on high-cost higher-carbon imports; support thousands of high-quality jobs; deliver billions in economic value; reinforce the UK's offshore industrial base; and enable a smoother, more resilient energy transition.

For these reasons, I support the progression of both projects through the regulatory process and encourage OPRED to grant consent to these projects.

J0283

I want you to be aware of my dismay that the Prime Minister is considering issuing licenses to allow oil and gas drilling at Rosebank and Jackdaw. It seems like a retrograde step as we are experiencing the impacts of climate crisis now.

In my view investing in alternative energy sources and adapting to the changing climate would be a much better use of money and brain power.

J0284

I am writing to submit my formal representation IN FAVOUR OF granting environmental consent for the Jackdaw Field Development (Reference: D/4260/2021).

Key Reasons for Support:

1. Domestic Energy Security: Jackdaw utilises existing UK North Sea infrastructure (tied back to the Shearwater hub) and can supply significant domestic natural gas to reduce reliance on higher-emissions imported Liquefied Natural Gas (LNG).

2. Economic Benefit & Jobs: The project supports crucial UK supply chain jobs, skilled offshore roles, and generates substantial tax revenues for public spending.

3. Lower Emissions Profile: Local gas extraction via tied-back infrastructure carries a lower overall carbon intensity compared to long-distance imported gas alternatives.

I urge the Secretary of State for Energy Security and Net Zero to grant environmental consent for this project to proceed.

If we no longer used oil and gas fair enough, but we do and we will continue to do so for years

Better sell ours support jobs and get tax revenues whilst we transition

Transition does not mean jump off a cliff

J0285

As a resident of Scotland, brought up in the North East, I would like to register my objection to any further drilling in the North Sea, for oil or gas, including the Jackdaw field.

With wildfires burning across Scotland and Europe, we need to take responsibility for the disastrous effects that using fossil fuels is having on our planet, and on our economies. We need to be investing in renewable sources of energy, and we need to stop relying on oil and gas. That shift has to start now, not keep being pushed into the future.

And any suggestions that drilling in the North Sea will help with energy costs in Scotland or the rest of the UK are misleading, as oil and gas prices are set internationally.

So, please step up, take responsibility for the future of the planet, and stop drilling for the fossil fuels that are endangering all our futures.

J0286

I write to formally object, in the strongest possible terms, to the proposed development of the Jackdaw gas field.

Approving this project is incompatible with our national and international climate commitments. New fossil fuel extraction does nothing to secure lower energy prices for UK households, instead locking us into long-term carbon dependence while yielding minimal direct employment benefits.

I urge the government to refuse development consent and instead focus entirely on accelerating renewable energy sources.

J0287

I am writing to register my strong opposition to the Jackdaw Project and to any decision that would permit further extraction of hydrocarbons from this field.

I write both as an ecologist and as a scientist who is deeply concerned by the continuing expansion of fossil-fuel extraction at a time when the scientific evidence on climate change could scarcely be clearer. Climate change is not a distant or theoretical future threat. Its effects are occurring now, in the United Kingdom and across the world, through increasingly severe heat waves, flooding, drought, wildfires and other extreme weather events, with consequences for ecosystems, human health, food security and lives.

Against this background, approving new oil and gas extraction is, in my view, fundamentally inconsistent with the scale and urgency of the transition that is required. The UK should be accelerating its move away from fossil fuels, not authorising the extraction and combustion of additional hydrocarbons that will contribute further greenhouse-gas emissions over the coming decades.

The issue extends far beyond meeting individual emissions targets on paper. Every additional development contributes to the cumulative burden of greenhouse gases in the atmosphere and perpetuates infrastructure and economic dependence on fossil fuels. Decisions being taken now will have environmental consequences long after the immediate economic benefits of an individual project have passed.

As an ecologist, I am particularly concerned that climate change is already placing ecosystems and biodiversity under substantial and increasing pressure. Species and habitats cannot simply adapt indefinitely to rapidly changing temperatures, altered rainfall patterns, extreme weather events and associated ecological disruption. These impacts ultimately affect people as well: functioning ecosystems underpin food production, water regulation, flood protection and many other services on which society depends.

There is also an important question of responsibility to future generations. We already possess overwhelming scientific evidence about the consequences of continued greenhouse-gas emissions. Our children and future generations will live with the environmental consequences of decisions being made today. Continuing to open new sources of fossil fuels despite that knowledge is a course I find extremely difficult to justify scientifically or ethically.

I recognise that the transition away from fossil fuels presents genuine challenges for energy security, employment and the wider economy. However, those challenges strengthen the case for rapid investment in renewable energy, energy efficiency, storage and other low-carbon infrastructure; they should not be used to justify prolonging dependence on additional oil and gas extraction.

I therefore urge you to reject PRA/357 and not permit the Jackdaw Project to proceed. The UK should demonstrate genuine climate leadership by accelerating the transition away from fossil fuels rather than approving further hydrocarbon extraction.

Please record this correspondence as my formal objection to the proposal.

J0288

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The increasingly well-established relationship between climate change, extreme heat and premature mortality.

The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

The Government's stated intention to protect the population from the health consequences of extreme weather.

Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

Where and how the current consultation was publicised;

Which newspapers and other media outlets carried the statutory notices;

What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;

Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;

And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves,

worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0289

To whom it may concern,

I write to formally object, in the strongest possible terms, to the proposed development of the Jackdaw gas field.

Approving this project is incompatible with our national and international climate commitments. New fossil fuel extraction does nothing to secure lower energy prices for UK households, instead locking us into long-term carbon dependence while yielding minimal direct employment benefits.

I urge the government to refuse development consent and instead focus entirely on accelerating renewable energy sources.

J0290

I'm adopting a Trump-style response to the consultation. You already know all the arguments so I will save you the time of reading them all again.

JUST SAY NO!

DRILLING IS KILLING.

J0291

As a member of the public I support the opening of this gas field. We are currently importing gas from various locations around the world, they are delivered to this country

by heavy oil powered ships. This is in addition to the amount of pollution placed in the atmosphere by the countries producing this gas.

The argument that it doesn't count against our countries carbon emissions, but in this case we are responsible for these emissions, so are the emissions from drilling for our own gas and oil in excess of the amount produced to deliver gas to our country.

Processing our own gas and oil would lead to more employment and a greater revenue for the Exchequer. This would make us more self sufficient in our energy security and less dependent on alternative supplies which are subject to Geo-Political shocks.

In short I totally agree that this field and others should be opened for the benefit of the country.

J0292

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK’s own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and

corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0293

Global scientific consensus is clear. There can be no new extraction of fossil fuels if we are to stand a chance of keeping global temperature rises below 2.5c compared to pre-industrial levels. Let alone levels which match the Paris Agreement and give the world a chance of remaining habitable in major areas under threat.

Renewable energies are becoming cheaper. China has placed a bet on that being the future. The UK must do the same.

Put aside the nuances and economic arguments about needing fossil fuels for some years to come. There will not be business or an economy if we do not act with alacrity to tackle global heating.

Any decision to proceed is sacrificing our children's future for very short term considerations.

J0294

I am writing to express my opposition to the possible licensing of the Jackdaw field in the North Sea. We are currently experiencing a summer dominated by extreme weather conditions and wildfires. The overwhelming scientific consensus is that all this has been made much worse by the burning of fossil fuels. If we are to have any hope of giving our children and grandchildren a liveable future, then we must act now to reduce our depends on fossil fuels. The UN has made it clear that we must stop all new fossil fuel developments if we are to avoid the worst excesses of climate change. As Antonio Gutteres said recently, 'Countries that cling to fossil fuels are not protecting their economies—they are sabotaging them, driving up costs, undermining competitiveness, locking in stranded assets, and missing the greatest economic opportunity of the 21st century.” It is clear that any development of Jackdaw would not increase the UK's energy security or its ability to influence the global market as any product would be sold on the open market. Worst of all, it would damage our reputation as a leader in combatting climate change and therefore discourage other countries from taking action to reduce dependence on fossil fuels.

I quote from the LSE Grantham Research Institute on Climate Change and the Environment, press release February 2025.

The Government allowing the development of Rosebank and Jackdaw would lead to confusion about the direction of travel and undermine investment into the clean transition. This might be justified were there to be clear economic benefits but, in fact, such investment risks generating low returns and would be against the UK's strategic economic self-interests, causing the country to:

- **Risk putting money into stranded assets which will require taxpayers to bail out decommissioning costs**
    - The breakeven price for the Jackdaw and Rosebank fields is below the price for oil and gas prevailing today, but higher than many fields around the world (for context, see **this analysis**). With oil demand **likely to peak and fall** over the coming decade as cars and other technologies become powered by electricity, these fields may be rendered uneconomic and left unused soon into their lifetime.
    - Further global tensions in oil producing regions such as Russia, the Middle East or elsewhere may help sustain higher oil and gas prices, and prolong the viability of the fields, but this risk simply increases the economic rationale for investment in cheaper, domestically sourced renewable energy.
- **Lock in further reliance on volatile oil and gas markets while losing out on productivity and efficiency gains of domestic clean energy**
    - **Evidence is clear** that production from Jackdaw and Rosebank would make no significant difference to the UK's energy security or ability to influence international market prices for oil and gas.
    - Instead, by undermining investment in the transition away from fossil fuels, it would leave the UK vulnerable to future potential price shocks. The energy crisis triggered by Russia's invasion of Ukraine helped to drive inflation and required the Conservative Government **to spend more than £58 billion in 2022–23** to protect households and businesses against high prices, which contributed to huge profits for energy companies and foreign gas suppliers.

- The oil and gas economy involves ongoing imports from volatile international markets and costly labour resources to operate associated infrastructure, whereas the clean economy is built on capital- and knowledge-intensive technologies like wind, solar PV and batteries which operate at close to zero marginal costs, once the kit is installed. This means lower cost electricity and electric vehicles that are cheaper to run and maintain than internal combustion engines.

- **Miss the growth opportunity of the 21st century**
  - Net zero is a growth opportunity for the UK because domestic firms and innovators are able to create competitive clean products and services for growing global markets. According to the International Energy Agency, the global market for key clean energy technologies is set to triple to more than $2 trillion by 2035 as energy transitions advance.
  - Realising this opportunity requires investment now in the necessary capabilities and supply chains within an overall rise in annual public and private investment of no less than 3% of GDP each year, with around 1% coming from public investment, to drive sustainable growth and tackle environmental degradation.
  - The UK has existing comparative advantages over other countries in services like green finance and in many clean technologies like offshore wind, carbon capture and storage and tidal stream energy. Given the location of such strengths around the country, related investments also have the potential to boost the performance of some of the UK's less productive regions.
  - Failing to drive that investment would mean a loss of competitiveness in global markets for the technologies and services of the future, leading to continued stagnation in productivity and living standards.

- **Fail to capture broader benefits such as cleaner air**
  - A slow transition would also mean the UK would be delayed in capturing the broader benefits – such as cleaner air, improved access to green space and reduced traffic congestion – of adopting clean energy and infrastructure.
  - These problems currently threaten people's wellbeing and limit productivity, with air pollution costing the NHS and UK businesses more than £20 billion each year.

- **Lose its ability to convince other countries to act**

- Allowing the development of these fields would send a dangerous **signal to other fossil fuel producing countries** that the UK Government supports a 'business as usual' approach to the oil and gas industry, undermining efforts to limit global warming to 1.5°C.
- This would have catastrophic impacts on the UK and populations around the world. According to a **2022 LSE study**, without strong global mitigation action, the total cost of climate change damages to the UK could increase from 1.1% of GDP in 2020 to 3.3% by 2050 and 7.4% by 2100.

Esin Serin, Policy Fellow at the Grantham Research Institute on Climate Change and the Environment at the London School of Economics and Political Science, said:

"Allowing the development of Rosebank and Jackdaw would be clearly against the interests of the UK public and the economy, whatever a narrow assessment of the environmental impacts may suggest. The signal such a decision would send to investors in the UK and to other fossil fuel producing countries would be disastrous.

"Continuing to support investment in oil and gas is not a credible clean growth strategy and would fail to convince investors to put their money in the UK when it comes to developing clean echnologies and capabilities of the future. The result would be a loss of competitiveness in global markets and forgone growth opportunities. Prioritising clean growth is the common sense approach."

J0295

As part of the public consultation into this project, I would like to put forward my support for it. This project will reduce the UK's reliance on imports and provide much needed tax revenue to the UK government. Also providing much needed jobs through the supply chain to the north east of Scotland and country as a whole.

J0296

With regard to the D/4260/2021 - Jackdaw Public Consultation, I wish to declare my support for bringing the development on stream, whilst also making the following comments and posing a high-level energy source questions:

- I started working in the offshore hydrocarbon industry in 1991, and expanded into HVDC Interconnector Projects in the late 1990s via work with the Norwegian Network provider, and with OWF developments in the Moray Firth in 2007. As such I have a good overview to comment on the current status of the offshore energy industry, and the transition to renewables.
- From personal experience, working with subsea Interconnector and bootstrap HVDC cable projects, as well as offshore wind farm develops, the implementation of developments from concept to operation is still too long to justify moving rapidly away from hydrocarbon sources of energy, averaging at least 10 years, even for NIPs via DCO. As such the provision of reliable sources of hydrocarbons to maintain energy supply is imperative as the National Grid is currently not fit for purpose for power derived 100% from renewables, nor for the planned additional renewable connections required to produce required energy from renewables alone.
- The environmental impact of deriving UKCS hydrocarbons, as opposed to importing from other suppliers by ship is significantly less, and removes the transport costs which are additional to the costs of the hydrocarbons on the open market, as well as emissions for ship transport vs. existing export facilities.
- The environmental and HSE aspects of deriving hydrocarbons from UKCS, in a tightly regulated industry, are far safer and more environmentally aware than importing from other sources (excluding the NOCS), and therefore are a positive indicator for the project.
- The GeoPolitical stability and security of source areas for hydrocarbons outwith the North Sea Basin are increasingly at higher risk. Although the UK cannot escape the cost fluctuations of the global market, sources local to the North Sea basin (UKCS / NOCS) are more reliable and under direct control of the UK / EU / EOS nations and their collective asset monitoring systems and security awareness for deliberate damage of infrastructure.
- Although the focus on the Jackdaw (and Rosebank) developments has been on the environmental effects of burning hydrocarbons for fuel, the use of hydrocarbons for non-fuel purposes cannot be ’transitioned’ easily as the technologies for replacing hydrocarbon-based devices with less environmental effects have not been proven / do not exist to date at scale.
- The government’s 'just transition' for the switch for reliable energy production from the hydrocarbon industry to the renewables industry (wind, wave, hydro, solar) both as a concept and as a viable skills transfer has failed miserably, and the opportunity to transfer the experiences gained from 60 years of offshore hydrocarbon extraction and supply experience in the North Sea to the offshore

renewables industry is rapidly reducing. Until the OWF turbines are fully installed and commissioned, the majority of the work is the same as installing an offshore hydrocarbon extraction system, in fact it is far simpler for OWFs and HVDC interconnector systems as the risks associated with a hydro-carbon spill or gas leak are not present. The 'just transition resulting in less environmental effects' cannot be used as a reason for blocking Jackdaw, as it is far from ready to offer up a viable alternative to hydrocarbon extraction, and the inertia in implementing it has actively led to key stakeholders not investing in, or leaving the Basin. This is compounded by the current Profits Levy on hydrocarbons, which makes the Basin one go the highest taxed areas in the world, so any investment in the area, especially for a constructed and commissioned field is to be supported, as per the original decision of the UK Government. The transition *per se* is unlikely to be completed within the next decade, by which time the additional expense of the decommissioning and re-developing of the current OWFs will be adding to the financial burden, without a fall-back solution, which can only be hydrocarbons.

Given the environmental objection which has created the need for this Public Consultation, have similar environmental 'upstream' effects been considered for the installation of the alternate offshore renewable sources which have a significantly shorter lifespan, and given the outsourcing of the infrastructure procurement, manufacture, installation and operation, do these provide the benefits to the UK economy and environment in a way which the highly legislated hydrocarbon extraction industry is currently not seen to provide?

Similarly what are the environmental impacts and economic costs of decommissioning and/or replacing old and obsolete OWF assets at the end of the 25 year lifespan commonly cited within development planning applications?

JACKDAW PUBLIC CONSULTATION D/4260/2021

ROSEBANK PUBLIC CONSULTATION ES/2022/001

Response from:

DNV UK Limited

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Submitted to:

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1 OUR HEADLINE MESSAGE

Climate change is real and the transition of UK energy demand away from fossil fuels needs to be accelerated. The bulk of greenhouse gas emissions from fossil fuels are scope 3 and come at point of use. Scope 1 emissions arising from fossil fuel extraction and scope 2 emissions from oil and gas operations are also important and can be kept to a minimum with good governance, regulation and controls such as those in the North Sea.

DNV's Energy Transition Outlook[1] forecasts that UK fossil fuel use will decline substantially over time, and long-term energy security will come from domestic renewables, nuclear, storage and flexible demand. However, we also show that the UK will still require substantial oil and gas volumes to support the energy system during the transition. We forecast that about 14 bn barrels of oil equivalent (boe) will be required between now and 2050. The NSTA estimates that about 10 bn boe could be produced from the United Kingdom Continental Shelf (UKCS) – this represents about 70% of our total requirement.

*DNV's **Energy Transition Outlook** is a single forecast that reflects the most likely outcome for our energy transition based on current technology development, costs, energy demand and policies. We do not develop scenarios to cover a range of outcomes or force our model to reach government targets such as net zero emissions in 2050. Our Outlook is updated annually – the UK report is now in its fourth year and the tenth 2026 global report will be issued in the Autumn.*

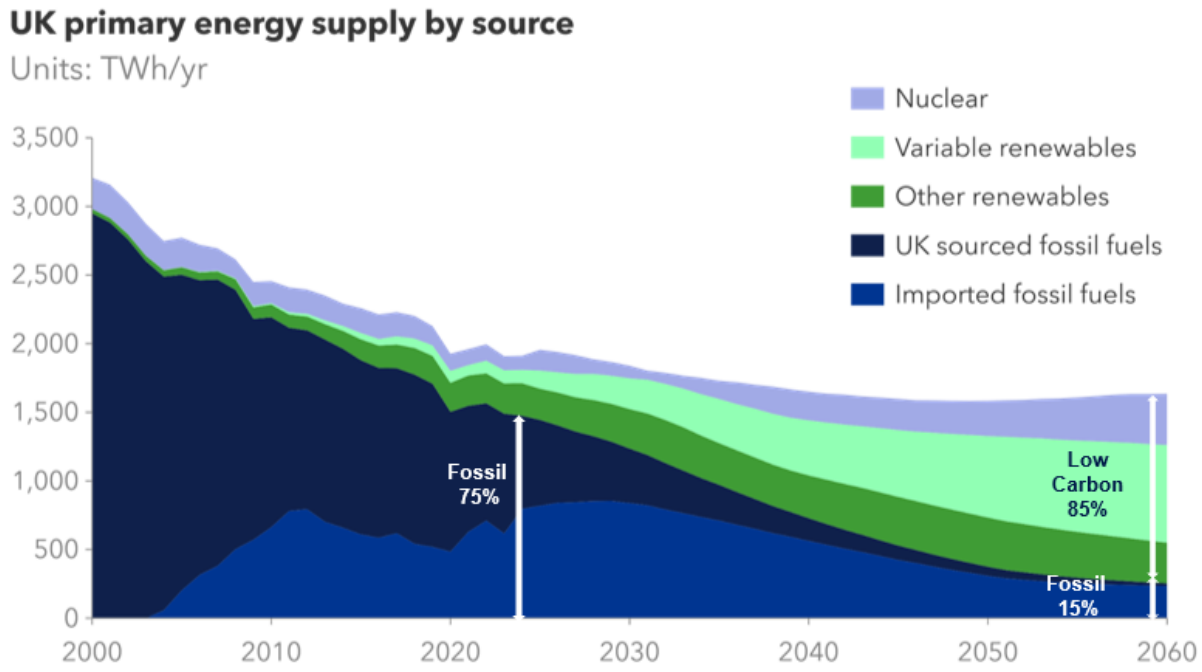
The UK now has a choice to either produce from the UKCS or import from overseas. Our analysis concludes that replacing domestic North Sea production with imports would reduce energy security and increase lifecycle supply-chain emissions because a larger share would come from LNG and other higher-emission sources of hydrocarbon production. Every barrel of oil or cubic metre of gas produced and sold domestically reduces the amount that must be purchased from abroad. This helps reduce the UK's energy import bill and improves tax receipts.

For the same unit of gas and oil consumed in the UK, North Sea hydrocarbons delivered by pipeline are generally one of the lowest greenhouse gas emission supply options available to the UK with materially lower scope 1 and 2 emissions than imports of LNG.

[1] https://www.dnv.com/energy-transition-outlook/uk/

2 THE FUTURE OF FOSSIL FUELS IN THE UK ENERGY MIX

The UK has set itself ambitious climate targets and our forecast shows that the UK is transitioning quickly and effectively. In our Energy Transition Outlook, we show that primary energy supply will continue to shift away from fossil fuels to low-carbon sources, with the former reducing from 75% of primary energy today to 34% by 2050 and 15% in 2060 as shown below.



Without further recovery of hydrocarbons from fields such as Jackdaw and Rosebank, we forecast that the proportion of imported hydrocarbons would increase from about 50% today to close to 100% by 2050 - this would increase global scope 1 and 2 emissions and increase UK dependence on imported oil and gas.

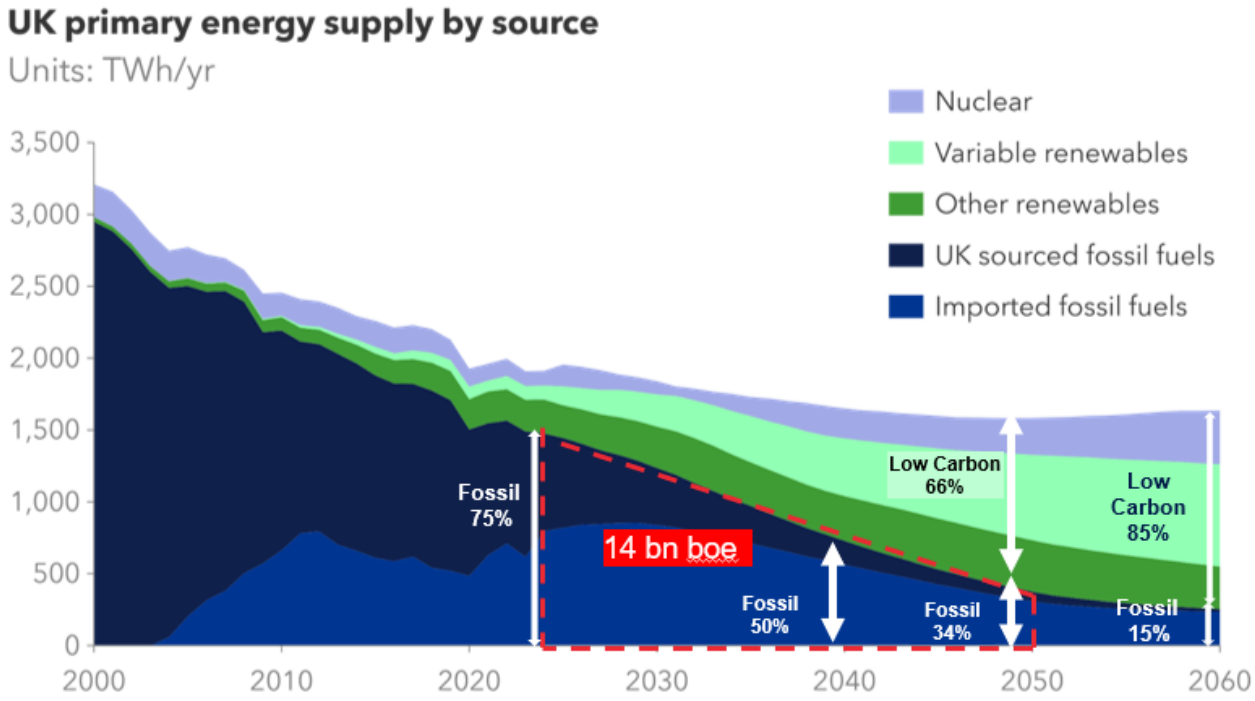
The UK government has committed to deploy CCS to decarbonise the hydrocarbon "tail" from the hard-to-abate areas and the industrial clusters. We forecast that the UK will need to sequester 52 $MtCO_2$/annum by 2060 - retention and repurposing of UKCS infrastructure and skills is an important consideration to support the development of both CCUS and offshore wind infrastructure[2].

3 HOW MUCH ENERGY FROM FOSSIL FUELS IS NEEDED BY 2050?

By using our plot of UK primary energy supplies, we can calculate the quantity of fossil fuels required between now and 2050. The area under the curve and outlined in red below amounts to about 14 bn boe and about 10 bn boe could be sourced from the North Sea[3] leaving an import requirement of 4 bn boe.

[2] Examples of UK assets being repurposed for CCS are Eni CCUS, Viking CCS, Acorn SCO2T, Northern Endurance for the Humber and Teesside industrial cluster and Perenco's Poseidon projects.

[3] NSTA UK Oil and Gas Reserves and Resources (end 2024). Issued Oct 2025 https://www.nstauthority.co.uk/news-publications/reserves-and-resources-as-at-end-2024/



4 NORTH SEA FOSSIL FUELS ARE THE LOWER CARBON OPTION

For the same unit of gas consumed in the UK, North Sea gas delivered by pipeline is the lowest-greenhouse gas supply option available to the UK and materially lower in emissions than LNG imports.

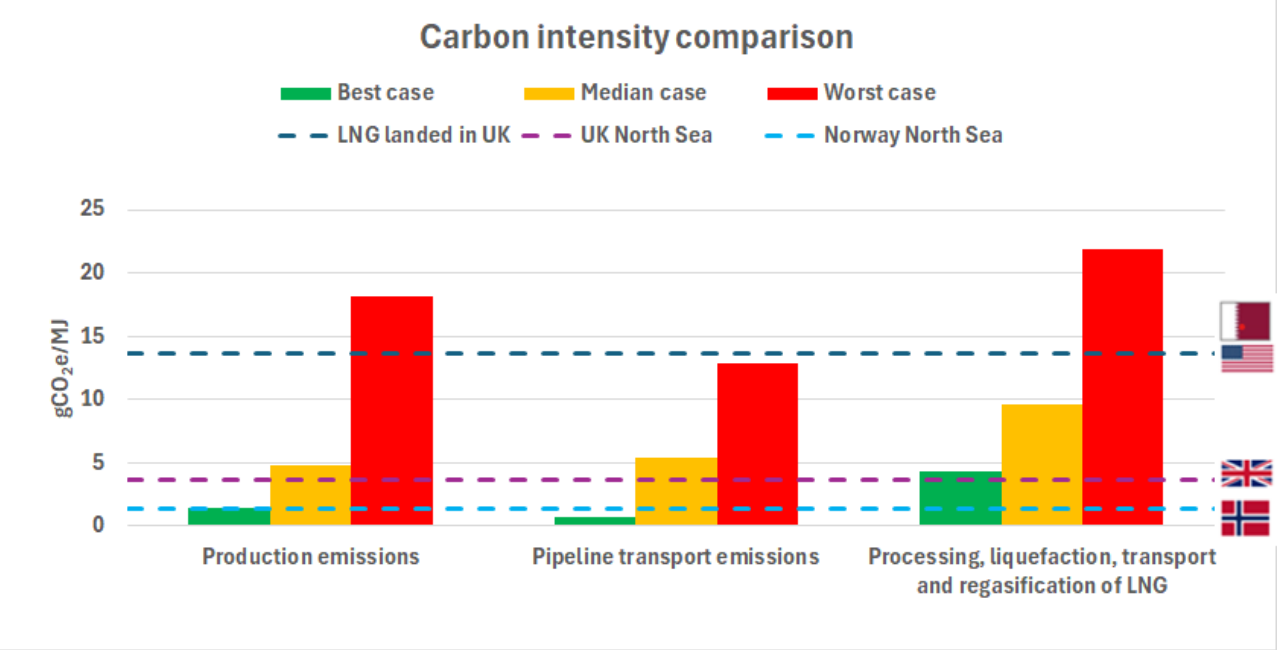
DNV carried out a benchmarking exercise for a European regulator that derived the ranges of carbon intensity of different sources of natural gas. Our global assessment[4] covered lifecycle emissions from upstream hydrocarbon production, pipeline transport and the additional steps required for making and transporting LNG. A summary of the best (green), median (amber) and worst (red) cases is shown in the plot below. Note that:

- North Sea gas emissions (from both the UK and Norwegian sectors) are the sum of the production and pipeline transport categories
- For LNG landed in the UK, emissions are the sum of gas production and pipeline transport categories (as for North Sea gas) **plus** emissions from the additional processing, liquefaction, transport by tanker across the Atlantic or from the Middle East and then regasification prior to injection into the National Transmission System.

We have overlaid the overall carbon intensities of gas in landed in the UK from the Norwegian continental shelf (blue dotted line), the UK continental shelf (purple dotted line) and LNG from Qatar and the United States (dark blue dotted line)[5].

[4] International Council on Clean Transportation - https://theicct.org/wp-content/uploads/2023/07/ISO_blue_hydrogen_GHG_ICCT_DNV.pdf with input from Agora Energiewende

[5] North Sea Transition Authority https://www.nstauthority.co.uk/media/nupk5sx1/emissions-intensity-of-producing-natural-gas-factsheet-sept-2025.pdf



We concluded that natural gas sourced from the UK and Norwegian North Sea is among the lowest carbon sources of gas available to the UK – they are both close to best in class. Imported LNG necessarily has higher emissions than locally produced pipeline gas due to additional processing, liquefaction to -160 °C, fuel consumption and methane boil-off during shipping, transfer to onshore tanks and regasification before injection into the UK gas network.

5 OTHER IMPACTS OF SOURCING GAS FROM THE UKCS

UK fossil fuel use will decline substantially over time, and long-term energy security will come from domestic renewables, nuclear, storage and flexible demand, with energy imports falling to about 15% of total demand by 2060. However, in the interim, North Sea fossil fuels could be an important part of energy security and reduce import dependence, and resilience during the transition. According to our DNV *Energy Transition Outlook UK 2026*, here are some additional points to consider:

1. Producing fossil fuels domestically[6] supports UK supply-chain businesses, and tax revenues. A reliance on imports shifts economic value overseas rather than retaining it within the UK economy. Whereas, every barrel of oil or cubic metre of gas produced and sold domestically reduces the amount that must be purchased from abroad. Skills retained by maintaining the UK Oil & Gas industry will be needed to support the development of offshore wind and CCUS.

2. Better energy security - the UK will still need significant quantities of oil and gas during the energy transition, with around 14 billion boe required between now and 2050. Without continued domestic production, the UK would become more reliant on imports up to the early 2040s, increasing exposure to supply disruptions. Greater imports of fuels leave the UK more vulnerable to international conflicts (Ukraine and Iran), sanctions (Russia, Iran, Venezuela), shipping disruptions (Straits of Hormuz, Bab-al-Mandab, Suez and Nord Stream), and decisions by exporting countries. Domestic North Sea production reduces vulnerability to these external shocks.

[6] Offshore Energies UK https://oeuk.org.uk/uk-must-back-domestic-oil-and-gas-alongside-renewables-to-secure-energy-supply/

3. Renewable electricity generation will grow rapidly but DNV forecasts that two-thirds of homes (about 16 million households) are likely to use gas boilers in 2035, more than half of vehicles will still be fossil-fuelled in 2035 and gas-fired electricity generation remains important for balancing a renewable-heavy power system. Fossil fuels will be needed to support the transition while renewable capacity, storage, hydrogen and grid infrastructure are being expanded. About 35 GW of gas-fired electricity capacity (equivalent to about 5 M sm^3/h but depending on the efficiency of the power generator) will still be needed through the 2030s to provide flexible backup when wind and solar output is low.

About DNV

DNV is the independent expert in risk management and assurance, operating in more than 100 countries. Through its broad experience and deep expertise DNV advances safety and sustainable performance, sets industry benchmarks, and inspires and invents solutions.

Whether assessing a new ship design, optimizing the performance of a wind farm, analyzing sensor data from a gas pipeline, or certifying a food company's supply chain, DNV enables its customers and their stakeholders to make critical decisions with confidence.

Driven by its purpose, to safeguard life, property, and the environment, DNV helps tackle the challenges and global transformations facing its customers and the world today and is a trusted voice for many of the world's most successful and forward-thinking companies.

In the energy industry

DNV provides assurance to the entire energy value chain through its advisory, monitoring, verification, and certification services. As the world's leading resource of independent energy experts and technical advisors, the assurance provider helps industries and governments to navigate the many complex, interrelated transitions taking place globally and regionally, in the energy industry. DNV is committed to realizing the goals of the Paris Agreement, and supports customers to transition faster to a deeply decarbonized energy system.

Learn more at www.dnv.com

J0298

Please find attached a response from DNV to your consultation on the Jackdaw (D/4260/2021) and Rosebank (ES/2022/001) field developments. Our response is based on our independent research and analysis of the whole energy system and energy transition in the UK.

If you require further information or clarification on any point, we would be happy to discuss our analysis with you.

J0299

I write to formally object to the proposed development of the Jackdaw gas field.

Approving this project is incompatible with our national and international climate commitments. New fossil fuel extraction does nothing to secure lower energy prices for UK households, instead locking us into long-term carbon dependence while yielding minimal direct employment benefits.

I urge the government to refuse development consent and instead focus entirely on accelerating renewable energy sources.

J0300

Please accept this email as a representation to the Secretary of State in relation to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001.

I am writing on behalf of StormGeo Ltd, a UK business providing weather intelligence, forecasting and decision-support services to the offshore energy and maritime sectors. StormGeo has a long-standing presence within the North Sea energy supply chain, supporting offshore operators and their supply chains in managing weather-related operational risk, safety and planning.

Our interest in Jackdaw and Rosebank reflects our broader involvement in supporting offshore energy activity on the UK Continental Shelf. Continued investment in major North Sea developments provides important activity not only for operators and their principal contractors, but also for the extensive specialist supply chain that supports safe and efficient offshore operations.

For businesses such as StormGeo, a clear and timely decision on projects of this scale provides greater certainty for workforce and resource planning, investment in specialist capabilities, and the retention and development of skills required to support offshore operations in the UK.

The impact extends beyond individual projects. A sustainable pipeline of North Sea activity helps maintain the specialist expertise, infrastructure and supply-chain

capability that has been developed in the UK over many years. These capabilities are also important to the wider offshore energy sector as it continues to evolve.

We therefore support a timely decision and the granting of consent for the Jackdaw and Rosebank developments, recognising the contribution that both projects can make to continued investment, employment, skills and confidence throughout the UK offshore energy supply chain.

We would ask that the Secretary of State takes account of the representations of businesses and workforces throughout the wider supply chain when considering both development

J0301

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

I am very worried about continuing on the path we are on and the impact on those who are most vulnerable for example those who are over crowded in accommodation, vulnerably housed, homeless, facing food insecurity, children and the elderly. They all face the biggest impact of climate change, and bear the bring of the health and economic impacts. This step must be taken in the right direction as collective national action, to show accountability and responsibility for people now and in future generations.

Thank you for your time and consideration. I look forward to your response

J0302

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.
I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one

environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgement, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

- The rapidly deteriorating climate conditions being experienced in the UK and internationally.
- The increasingly well-established relationship between climate change, extreme heat and premature mortality.
- The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
- The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
- The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.
- The Government's stated intention to protect the population from the health consequence.

J0303

Dear Sir/Madam,

I am writing to express my support for the Jackdaw Field Development project, Consultation Reference D/4260/2021.

The UK continues to face significant energy challenges, with global political instability and international conflicts contributing to volatility in oil and gas markets and driving up energy costs for households and businesses. These increased costs have placed additional pressure on families already struggling with the ongoing cost of living crisis. In this context, I believe that developing domestic energy resources such as the Jackdaw field is both sensible and necessary.

The Jackdaw gas field, located in the Central North Sea east of Aberdeen, will help strengthen the UK's energy security by increasing supplies from a domestic source operating under some of the highest environmental and regulatory standards in the world. The project will utilise existing infrastructure through the Shearwater platform, helping to maximise efficiency while contributing to the nation's energy needs. [adura.com], [shell.co.uk]

I strongly believe that sourcing energy from UK waters is preferable to increasing reliance on imported oil and gas from overseas. Greater domestic production can help reduce exposure to international supply disruptions and price shocks, providing a more stable and reliable source of energy for the country.

The project will also deliver substantial economic benefits, supporting highly skilled jobs in Aberdeen, the North East of Scotland, and throughout the wider UK supply chain. The offshore energy industry remains a cornerstone of the regional economy, and investment in projects such as Jackdaw helps sustain employment, apprenticeships, and business opportunities for local communities.

I note that the Environmental Statement prepared for the project concluded that, following the implementation of mitigation measures, no significant environmental or socio-economic impacts were identified. The project has also been subject to extensive environmental assessment and regulatory scrutiny. [shell.co.uk], [gov.uk], [assets.pub…ice.gov.uk]

At a time when energy affordability remains a major concern for many households, it is important that the UK continues to develop responsible domestic energy sources. While the transition to lower-carbon energy continues, oil and gas remain essential to daily life, industry, and electricity generation. Producing these resources domestically helps support energy security, economic resilience, and the interests of consumers.

For these reasons, I fully support the approval and progression of the Jackdaw Field Development and respectfully request that my comments be taken into consideration as part of the consultation process.

J0304

I am writing in response to this consultation to urge you to reject the Jackdaw oil field development.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that new oil and gas fields are incompatible with limiting global warming to 1.5°C, which is what we need for a liveable future.

The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions.

We are already seeing the devastating consequences of continued fossil fuel extraction - record-breaking temperatures, floods, and wildfires which are causing crops to fail, food prices to rise, economic productivity to be lost, schools to close, ambulance services to be overwhelmed and more than 3000 excess deaths in the UK this year so far.

As scientists increasingly warn that we are on course for catastrophic warming beyond 1.5 degrees, every fraction of a degree saved is critical to averting the incredibly dangerous consequences of climate breakdown, and to protecting our national, economic, health and food security. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas

emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

I urge you to reject the Jackdaw oil field and instead prioritise policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction.

J0305

I email to register my very firm opposition to the potential granting of the licence for Jackdaw.

The current Israel/USA/Iran confrontation is a vivid demonstration of how vulnerable oil/gas markets are to political turmoil. Energy prices do not spike because renewables failed, they spike because we remain tethered to a system where a conflict thousands of miles away can determine whether a family in, say, Bristol can afford to heat their home.

There is a strong rejection that decarbonisation is a sacrifice. It's a national security strategy that simultaneously delivers energy INDEPENDENCE, lower long-run costs and sustainable economic growth.

Jackdaw's production, if given licence, doesn't end our vulnerability, it MAY delay it, very briefly. As we have a decline of a system that was always going to be replaced.

By approving Jackdaw, it will shine a light on a government willing to trade long-term credibility for, what can only be described as short-term relief, which in itself cannot be verified as, Shell marked it's own homework when it came to a feasibility study.

The communities most affected by climate breakdown, the very real and present breakdown, with the fifth heatwave, this year, beginning this week. Extreme heat, wildfires, extreme drought in areas, food insecurity, possible fresh drinking water insecurity, together with energy poverty, have very little to gain from Jackdaw.

North Sea jobs could be safeguarded through offshore wind, tidal and green hydrogen projects, all of which require many of the same skills, that the proposed 27 full time employees needed for the running of Jackdaw.

We have a genuine opportunity here: offshore wind capacity, ready now to lead this country in the next phase of the energy transition.

Jackdaw, by contrast, offers a few potential years of marginal supply, which will not directly benefit the people of this country, The site will also ensure a carbon legacy that rivals a nation's annual emissions, especially now that Shell have to count the emissions from scope 3. Plus a signal to investors, the likes of Blackrock, Vanguard etc and a signal to the future generations of this country that, when the pressure came, we flinched, we folded.

It's a big NO to the granting of the licence from me.

J0306

I am writing to you as someone who is deeply concerned about the future we are creating for ourselves and, most importantly, future generations. I am urging you to reject the proposed Jackdaw oil field development.

My concerns are based on the extremely urgent need for meaningful action to address the climate crisis, and the ethical implications of allowing fossil fuel companies to profit from an industry whose impacts are felt most severely by vulnerable communities and future generations. The consequences of climate change are becoming increasingly difficult to ignore. We are already seeing record-breaking temperatures, prolonged heatwaves and devastating wildfires here in the UK. Against this backdrop, I find it extremely difficult to understand why we would continue approving new fossil fuel projects when *no* new oil and gas fields are compatible with limiting global warming to 1.5°C.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. The fossil fuel industry has known for decades about the serious consequences of burning oil and gas, yet companies such as Shell continue to pursue new developments. At a time when ordinary people are being asked to change their behaviour and make sacrifices to address climate change, it feels deeply unfair that fossil fuel companies and their shareholders can continue to profit from further extraction at the expense of human lives and a liveable planet.

The scientific evidence should be at the heart of this decision. The Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has also warned that approving new North Sea projects such as Jackdaw risks undermining our net-zero targets and locking in additional emissions for *decades*.

I appreciate that Shell has argued that Jackdaw would have only a negligible impact on global emissions. Its environmental impact assessment suggests that the project would account for less than 0.02% of annual global greenhouse gas emissions, but I do not believe this should be used as a reason to dismiss the project's impact. Every single new fossil fuel project adds to the global carbon burden. Climate change is the result of the accumulation of emissions from countless individual sources. If every new fossil fuel project is justified because its individual contribution is relatively small, we will never make the progress necessary to tackle the crisis.

I am also concerned about what Jackdaw actually offers in return. The project is expected to create only 27 direct full time jobs. In contrast, the UK's offshore wind sector already employs over 30,000 people, with enormous potential for further growth. I would much rather see investment directed towards renewable energy, green infrastructure and industries that can provide secure, sustainable employment for the future.

We have a choice. We can continue investing in fossil fuels and risk locking ourselves into decades of additional emissions, or we can use this moment to accelerate the transition towards cleaner energy and create opportunities for workers and communities in the process.

There is also a moral question that I believe deserves serious consideration. The people who are most vulnerable to climate change are often those who have contributed least to the problem, while future generations will inherit the consequences of decisions being made today. It does not feel right to allow companies that have profited from fossil fuels for decades to continue expanding extraction while the wider public is left to deal with the environmental and social consequences.

I therefore urge you to reject the Jackdaw oil field development and instead support policies that:

• Accelerate the transition to renewable energy while ensuring a fair transition for workers in the oil and gas industry.

• Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

• Invest in green jobs, renewable energy and infrastructure that can provide lasting economic opportunities for communities.

I understand that decisions about energy security and the economy are complex. However, I believe that true leadership means looking beyond short-term gains and considering our futures and the world we are leaving to those who come after us.

The UK has an opportunity to lead by example. Rejecting Jackdaw would demonstrate that our commitment to tackling climate change is more than just words, and that we are prepared to make decisions based on the long-term interests of people and the planet.

I sincerely hope you will listen to these concerns and reject the Jackdaw development.

Thank you for taking the time to consider my views. I would appreciate a response explaining how the concerns around climate change, future generations and the long-term direction of our energy policy have been considered in this decision.

J0307

Dear Sir/Madam,

Please approve further oil and gas exploration for our energy security and to protect jobs.

J0308

I very much support the implementation of Jackdaw.

The rationale is as per Offshore Energies UK.

J0309

I support the submissions made by Offshore Energies UK.

Continuing to support UK industry, jobs and tax revenue by allowing the Jackdaw development to proceed quickly. It will also support a just pragmatic energy transition, reduce the impact on climate by reducing imports and strengthen our industrial base

J0310

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit

from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0311

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

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The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

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The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

Date: 10th August 2026

To the Business Support Team, OPRED

Representation relating to the Jackdaw and Rosebank Field Developments, references [redacted] and [redacted]

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references [redacted] and [redacted] made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of Anatec Limited, an employee-owned business based in Aberdeen employing 16 local people within the marine risk assessment, offshore energy and transition fields. Our interest in these projects is commercial and based on being able to keep our employee-owned local Aberdeen company engaged in all elements of the energy market including existing assets, proposed developments and transitional activities.

Our company has been operational since 2001 providing employment and training opportunities to graduates over that time and our ability to continue to offer employment requires certainty on a range of projects across the energy transitional field including Jackdaw and Rosebank.

These projects support a large supply chain of businesses like ours in Aberdeen and across the UK, and the jobs and skills within it. On the basis of what they mean for our business and our employees, we support the granting of consent.

I would ask that the Secretary of State takes account of representations from the businesses and workforces affected, and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

Yours faithfully,

[redacted]

[redacted]

Anatec Ltd

[redacted]

J0313

Dear Secretary of State,

In response to the consultation about the Jackdaw field, due to close later today, I wish to register my objection. The Climate and Waste Emergencies behove that Jackdaw (and Rosebank) should not proceed. In addition, proceeding with either or both would knowingly commit to an illegal act – breach of the Climate Change Act 2008 (2050 Target Amendment) Order 2019. It would also be a wrongful act, in breach of the ICJ's recent ruling.

Proceeding for political expediency (/ convenience / comfort) would not only be unforgivable but would also demonstrate that, unlike the great majority of the general public, government does not comprehend the Emergencies.

For negligible benefit and from a self-evidently weak negotiating position, proceeding would also expose the UK to being sued for loss of profit should the field have to close in advance of the scheduled end date.

The UK has already used up almost all its share of the global carbon budget under the UNFCCC's least ambitious target (for well below 2C), determined according to the science and the UK's historic culpability.

The UK would lose what little remaining credibility it has on the global stage. Time for more fossil fuel has run out – whether produced in the UK or embodied in what the UK imports.

J0314

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

I strongly object to the possibility of this oil and gas field being opened for fuel extraction.

We are living in a climate emergency and extracting and using fossil fuels will exacerbate this emergency, leading to higher temperatures, more forest fires and more deaths of animals and humans on this planet.

We have enough fuel already but much of it is being wasted by allowing one person to drive a large fossil fuel powered car at will rather than use public transport or active travel.

The oil field is not publicly owned and thus any profits will go to increase even further the wealth of the few people who own it and there shareholders. There is no evidence that it will reduce the cost of fuel and power for the people of the nearest country, ie Scotland, who are already paying some of the highest fuel and energy prices in Europe.

We have plenty of alternative sources of power that we need to use: solar, wind and tidal. They are currently not being used to their full potential.

I urge you not to all extraction from this field**,**

J0315

Dear Sir / Madam,

It is incomprehensible that the Jackdaw field drilling is even being considered for approval for more drilling. As the UN says, we must not extract any more oil or gas.

This application to drill must be refused. Any other decision would be catastrophic for the planet and our children's future.

J0316

To whom it may concern,

I write to formally object, in the strongest possible terms, to the proposed development of the Jackdaw gas field.

Approving this project is incompatible with our national and international climate commitments. New fossil fuel extraction does nothing to secure lower energy prices for UK households, instead locking us into long-term carbon dependence while yielding minimal direct employment benefits.

I urge the regulator and the government to refuse development consent and instead focus entirely on accelerating renewable energy sources.

J0317

Dear Secretary of State and OPRED Regulators,

I am writing as a local Green Party councillor on behalf of my residents and their future generations to formally and strongly object to the revised Environmental Statement and approval application for the Jackdaw gas and condensate field (Reference: D/4260/2021). Following the legal ruling that previous consents failed to account for full lifecycle emissions, this revised consultation makes it plain that proceeding with Jackdaw is incompatible with our local, national, and global climate duties.

Climate Science and Forecast Emissions:
Carbon emissions: The revised environmental data reveals that Jackdaw will still unleash tens of millions of tonnes of
equivalent over its operating lifetime. There are then the

Incompatibility with Carbon Budgets: Leading UK climate researchers, including Greg Muttitt, Emily Shuckburgh, Kevin Anderson, and many others have repeatedly demonstrated that wealthy industrial nations like the UK must rapidly phase out fossil

fuel extraction to stay within the Paris Agreement limits, including no new development. Research from climate analysts shows that new extraction fields bypass remaining carbon budgets entirely, locking in climate warming trajectories that guarantee severe local climate impacts—such as extreme heat, flooding, failed harvests, etc —which local councils are left to manage with chronically underfunded budgets.
The Lie of 'Insignificant' Emissions: The developers argue that Jackdaw's emissions are a small percentage of global or sectoral totals. This slice-of-the-pie accounting is a dangerous illusion. Every single new extraction project claims insignificance while collectively pushing the planet past well researched irreversible tipping points. Every extra emission is now hugely significant to humanity's future.

There is more I could write. Time prevents it. I am sure this ties in with other submissions you will have received.
Why Jackdaw Fails the UK Economy:
The claim that extra North Sea drilling shores up the British economy is a myth. Approving Jackdaw does not deliver economic stability or Iublic benefit:
Few New Employment Places created: Official project documentation reveals that the Jackdaw platform will be unstaffed for most of its operating life - indeed the proposal document itself states that it is "not permanently attended", supporting a negligible number of direct, long-term full-time UK jobs (as few as 27 direct operational jobs from what I can make out). This is a drop in the ocean compared to the hundreds of thousands of sustainable jobs a rapid rollout of home insulation and renewable energy could provide, which would improve the outcomes for so many who are currently ill and stressed from the cost of heating sieve-like homes which get damp and too extreme in temperature dangerously easily.
Household Bills will not get Relief: Gas extracted from Jackdaw is not reserved for UK citizens at a discounted rate; it is owned by multinational joint ventures (Shell and Equinor via Adura) and sold dynamically onto the volatile international commodity market. It will do precisely zero to lower local energy bills or alleviate the cost-of-living crisis facing our communities.
Subsidising Corporate Profits Over Public Wealth: The massive capital expenditure required offers tiny net financial returns for the UK public relative to the multi-billion-pound funding that we supply to these projects, for example as decommissioning liabilities money and public tax reliefs. That it is considered OK to continue giving this money to companies making record properties while the Earth starts burning more, is utterly fatal in all senses of that word.
Transition Diversion: Pouring capital, engineering capacity, and political focus into dead-end fossil projects actively crowds out investment in the green transition. Economic vitality in the 2026 global landscape relies on localized renewable generation, grid modernization, and retrofitting—not clinging to depleting offshore hydrocarbons that enrich corporate shareholders while communities bear the

ecological cost.
Conclusion
Approving Jackdaw (D/4260/2021) defies clear climate science, tips us further into climate breakdown, offers little in economic returns, and fails to protect household energy security. I urge the government to reject this application outright, uphold our climate commitments, and redirect every resource toward a genuine, job-rich transition to renewable energy.

J0318

Dear secretary of state,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

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There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

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The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0319

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Thank you for your time and consideration. I look forward to your response.

J0320

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I urge you to reject the Jackdaw oil field and instead prioritise policies that:

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-Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

-Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction a step that prioritises short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong. I am very concerned for the future of my daughters.

Thank you for your time and consideration. I look forward to your response.

J0321

Dear Secretary of State,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

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The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0322

Dear Secretary of State,

I am writing to input to the current public consultation re. the proposed Jackdaw oil field development. I am strongly against the development proposed.

Adura's Environmental Impact Assessment claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project

adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions. This argument is spurious, putting forth, essentially, that Jackdaw will be 'a drop in the ocean' in the context of global emissions and the UKs carbon budget. Any fossil fuel extraction project could justify itself on these grounds, which ignores the cumulative effects of such projects worldwide.

Further fossil fuel extraction is not in step with meeting the challenges presented by the current climate emergency. The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. To limit warming to 2°C, global emissions would need to drop 35% by 2035 - even if all national commitments to carbon reduction were met this would not be achieved (UNEP Emissions Gap Report, 2025). The world is already off-track; it is self-evident that Jackdaw would take it further so. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions.

We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires. There is no justification for further fossil fuel extraction.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. This is a poor investment of taxpayer money, when far more economic benefit could be generated through projects focussed on transitioning the UK to more sustainable energy sources.

I am also concerned that new fossil fuel projects such as Jackdaw take the UK further off track in achieving stronger national energy security and addressing our current cost of living crisis. The products of projects such as Jackdaw will inevitably be sold on the international market, to the highest bidder. Investment in more sustainable energy projects - solar, wind etc., - would give us far more domestic control over energy access and prices, safeguarding UK citizens from over-reliance on imported fuels and associated oscillations in prices on the international market.

There is also a moral dimension to this issue. Fossil fuel companies have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. It is unjustifiable that UK taxpayers will continue to support the profit of a company with such a poor

record on ethics and human rights. I urge you to reject the Jackdaw oil field and instead prioritize policies that:

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Thank you for your time and consideration. I look forward to your response.

J0323

Dear Secretary of State,

I urge you to grant consent for this development, which has been delayed for far too long. Millions of pounds have already been invested in this project and it should be allowed to proceed.

The UK is still heavily dependent on gas and that is going to be the case for many years. Better to use gas produced by Jackdaw than to import even more gas from elsewhere. The development will also support jobs and investment in the UK and generate tax receipts for the UK; things that are desperately needed.

Thank you.

J0324

Dear secretary of state,

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The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

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Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0325

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have recklessly continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. They echo – and, therefore, strengthen – the conclusions of the International Energy Agency (IEA), which has said there are “no new oil and gas fields approved for development in our [1.5C] pathway”. The UK’s own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project’s environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK’s offshore wind sector already employs over 30,000 people, with opportunities for far

greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and deliberately mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0326

Sirs,

This consultation has drawn my attention only on the closing day, when the closing of the consultation has hit the news. I have not read all of the documentation.

I am neither for nor against the proposal. I expect that others will assess whether greenhouse gas (GHG) emissions associated with the production and processing of fluids from the Jackdaw field are minimised by the proposed scheme of working. Clearly, they should be, to the extent that is practicable, especially fugitive methane emissions. We should also be aware of the possibility of small fields being orphaned when processing facilities originally built for other purposes cease to be economic.

There will be GHG emissions from the use of produced fluids and these are beyond the applicant's control. I see the issue being not so much as to whether use of Jackdaw fluids will contribute GHG, but whether the use of Jackdaw fluids will contribute GHG that would not otherwise have been emitted. That is a point that cannot easily be proved, because it depends on the whole spectrum of UK GHG emissions.

There is a simple way of addressing this issue, in the context of the UK achieving nett zero GHG emissions by 2050. It would be possible to produce a trajectory of steadily reducing GHG emissions from the combustion of fossil fuels, to near zero by 2050. The use of hydrocarbons will not fall to zero, because of their use as a raw material in manufacture of many essential substances, including lubricants for wind turbines. It may even be necessary for there to be some use of hydrocarbons for fuel, given the difficulty of de-carbonising aviation. Some GHG emission from the use of petroleum hydrocarbons may be captured and stored geologically, but this 'end of pipe' solution is less preferred than avoiding GHG generation in the first place.

However, given a trajectory of steadily reducing oil and gas use, it would be sensible to limit UK production to be no more than UK use. Oil and gas are traded internationally, but UK use can be hypothecated. In that context, Jackdaw will not result in an increase in UK emissions,but will result in some decrease as a result of eliminating transport. It then becomes a purely commercial decision by operators, as to whether investment in new production facilities is commercially sensible in the context of a declining production ceiling.

Should a point occur when UK production can meet UK needs, then there may be no need for the international market to be involved, and UK can benefit from hydrocarbons on a production cost plus basis.

Whether or not Jackdaw will generate jobs is actually irrelevant. We should not destroy the planet just to create jobs. Instead, we need to plan to relocate jobs away from declining hydrocarbon production. Other industries have managed their decline, some better than others.

I am now retired and have never had an association with the applicants. This response may be published.

J0327

To whom it may concern:

In response to the public consultation, I write to express a strong opposition to any continued Jackdaw Field development. It is unacceptable for Scotland to continue any fossil fuel extraction, let alone expand upon it. In the hottest year on record, this is a question not only of morals, but of survival.

On Sunday July 19th, I went for a run from my home in Craigmillar in Edinburgh, only to run straight into the latest fire just starting on the Crags in Holyrood Park - less than a year after watching Nether Hill burn from my window and some two months after seeing Whinny Hill burn on my bike ride home. The following Friday July 24th, I sat on a farm in Cullerlie, helping to register singers in their 60s and 70s - tradition bearers of song and

culture of Aberdeenshire - for our singing weekend as we all choked on the smoke from the Cairngorms burning 50 miles away. I can only pray that my father, a slowly recovering stroke survivor, is going to survive the heatwaves in continental Europe this summer. All of these "small", everyday disasters are a direct result of anthropogenic climate change caused by extraction and burning of fossil fuels.
This is a matter of great personal importance to me, but more importantly a global issue. Europe faces heatwaves which have already killed thousands, and will continue to do so every summer for decades to come. And yet that is nothing compared to suffering experienced by those more vulnerable in lower income countries.
This needs to stop. As a public health expert and a scientist, I view our continued involvement in fossil fuel extraction as an active threat to the health of everyone on this planet, and as a particular threat to those made systematically marginalized. As a human being, I view it as immoral and infuriating. As a New Scot, I want none of this on our doorstep.
The purported economic benefit to Aberdeenshire or to Scotland is both overblown and, ultimately, false: there is no economic growth on a burning planet. We have plentiful wind energy in Scotland and we must pivot every penny and job to transitioning away from fossil fuels asap.

J0328

Dear Sir/Madam,

I urge you to refuse development consent for the Jackdaw field, because approving new fossil fuel production is incompatible with the scale and urgency of the climate crisis. The recent spate of wildfires across the UK shows that climate impacts are no longer distant or abstract - over 700 willdfires have been reported this year by the National Fire Chiefs Council.

Granting consent for more fossil fuel extraction would send the wrong signal at the very moment communities, emergency services and landscapes are under growing pressure from extreme heat and fire risk.

Please put public safety, climate responsibility and the UK’s clean energy future ahead of further fossil fuel extraction.

J0329

Dear Sirs,

I would like you to consider the following points which, in my opinion, strongly favour rejecting the issuance of a licence for further development of this field:

Environmental Grounds

- Scope 3 emissions: Greenhouse gases released from burning the extracted gas are excluded from the main corporate climate balances, driving global temperatures higher.
- Climate litigation risks: Approving fields under revised environmental statements leaves the project highly vulnerable to ongoing, lengthy, and costly legal challenges by climate groups.
- Carbon budget violations: Opening new fossil fuel infrastructure directly contradicts the UK's statutory net-zero targets and commitments under the Paris Agreement.
- Ecosystem degradation: Drilling activities risk disrupting marine habitats and local biodiversity in the North Sea.
- Transition delays: Continued reliance on domestic gas locks in fossil fuel infrastructure, slowing down the vital shift toward clean renewable energy.

Employment Grounds

- Job instability: Fossil fuel sector jobs are vulnerable to extreme global market volatility and boom-and-bust cycles.
- Skills gap expansion: Investing in oil and gas instead of renewables delays the retraining and transition of the workforce into long-term green tech roles.
- Stranded workforce risks: Workers face sudden layoffs when fields become economically non-viable due to tightening international climate policies.

Economic Grounds

- No impact on household bills: The extracted gas is sold on international market terms, meaning it will not lower energy costs for UK consumers.
- Stranded assets: Trillions in capital risk being trapped in unprofitable fossil fuel infrastructure as global carbon taxes and regulations tighten.
- Subsidy inefficiencies: Massive tax relief and investment allowances divert public funds away from cheaper, more stable renewable energy projects.

Thank you for considering these comments.

J0330

[redacted]

Jackdaw Reference: D/4260/2021
Rosebank Reference: ES/2022/001

[redacted]

Dear Consultation Team

[redacted] response to the Jackdaw and Rosebank consultations

[redacted] welcomes the opportunity to respond to the consultations on the Jackdaw and Rosebank field developments.

[redacted] connects both the North-East of Scotland and the North Sea to the world. We recognise the criticality of the energy sector to the region's economy, employment base and supply chain. [redacted] plays a crucial role in supporting connectivity for a region which has powered the UK for decades and remains central to both energy security and the transition to a lower-carbon future.

The North-East is at a critical point in its economic journey. The region requires a managed transition which protects skilled employment, attracts investment, sustains industrial capability and supports diversification into new areas of growth, including low-carbon energy, sustainable aviation, carbon reduction technologies, tourism and wider regional investment. [redacted] supports the region's potential to help deliver that transition through sustainable aviation fuel opportunities at St Fergus, green hydrogen production using surplus wind energy, and the Acorn carbon capture and storage project, all of which can help position the North-East at the forefront of clean energy innovation. This is consistent with AGS Airports' ESG strategy, which recognises the need to balance the social and economic benefits delivered by our airports with our climate change responsibilities.

BP's announcement that it intends to sell its North Sea business further underlines the precarious nature of the UK's oil and gas sector and the importance of providing clarity, confidence and a stable investment environment for projects that can sustain jobs, supply chains and energy security through the transition.

In that context, [redacted] supports consent being granted for the Jackdaw and Rosebank developments as part of a balanced approach to the UK's energy transition and energy security. Responsible, well-regulated domestic energy production has an important role to play while the UK accelerates investment in lower-carbon technologies and infrastructure.

The economic case for these projects is significant. According to Offshore Energies UK, Jackdaw and Rosebank are expected to generate £28.7 billion in Gross Value Added across their producing lifespans, including £9.1 billion in supply chain activity. They are also forecast to generate £1.4 billion in tax revenues before the end of this Parliament, rising to £3.8 billion before the expected end of the next Parliament in 2034. The projects are expected to support more than 3,500 jobs at peak construction, sustain 880 high-quality roles during production and create at least 125 apprenticeships.

INVESTOR IN PEOPLE

[redacted]

These benefits would extend beyond the operators themselves. Rosebank and Jackdaw are expected to support long-term work for ports, fabricators, manufacturers, engineering firms, vessel operators and specialist energy businesses across the UK, including many with strong links to the North-East of Scotland. This matters for a region whose economic future depends on retaining skills, supply chain capability and confidence in long-term investment.

[redacted] support is grounded in the need for a managed and responsible transition. Economic growth and environmental responsibility should not be treated as competing objectives. AGS Airports has committed to achieving net zero carbon emissions from its direct operations by 2035 and is supporting innovation in sustainable aviation fuel, zero-emission flight, responsible procurement and local supply chains.

For that reason, we recognise the importance of rigorous environmental assessment, transparency, mitigation and compliance through the statutory regulatory process. Decisions on consent must properly consider environmental impacts and ensure that any development proceeds within the framework set by the relevant regulator and government.

However, the transition to net zero must also be delivered in a way that protects communities, retains industrial capability and creates credible pathways into the jobs and technologies of the future. The North-East has the people, skills, infrastructure and supply chain expertise required to support both current energy needs and the development of lower-carbon industries. Losing that capability would weaken, rather than strengthen, the UK's transition.

[redacted] therefore supports consent being granted for Jackdaw and Rosebank, subject to the appropriate regulatory and environmental safeguards. We believe these projects can make an important contribution to energy security, economic resilience, skilled employment and a managed transition for the North-East of Scotland and the wider UK.

The UN defined sustainability as the ability to "meet the needs of today without compromising the ability of future generations to meet their own needs." The fragility of our energy supply chain as evidenced by the situation in the Middle East and the increasing outsourcing of existing energy resources that support a managed transition put us in danger of failing to meet today's needs.

The North-East of Scotland has powered the UK for decades. With the right investment, regulation and partnership through the transition it can power the UK for decades to come.

Yours Sincerely

[redacted]

J0331

Hi there,

I support this development.

This country uses hydrocarbons. It is better that we produce what we can of our own resources rather than buying from other countries where producers may operate to lower standards and pay no UK tax.

Please keep my personal details confidential and withheld from the public register

J0332

I am writing to urge you to support decide in favour of the Jackdaw development, at a key moment in the UK's offshore energy industry and its vital role in our country's financial, energy secure, and as important as a key part of the UK's energy transition future.

I am convinced that decisions made now regarding the North Sea will have a lasting impact on our energy security, economy, and our path to Net Zero. In order to support all objectives, I believe a pragmatic approach is needed, one that prioritises homegrown energy production, protects UK skills and jobs, and provides tax revenue to fund the cost-of-living crisis and invest in the technologies and skills development to achieve home grown energy transition of the coming years. A decision in favour of Jackdaw will also reduce our reliance on costly foreign imports, which also result in a significantly higher carbon footprint.

The UK's offshore energy sector supports over 200,000 skilled jobs and is a cornerstone of our local and national economy. It is also essential for the energy transition, with the skills and infrastructure in place to, over time, develop cleaner technologies such as carbon capture, hydrogen production and offshore wind, in economically and environmentally sustained ways. It Is a fact that many of these technologies are not yet fully developed, mature or sustainable for the energy transition to be accelerated overnight. They need investment, further development and testing to reliably, safely and sustainably be made ready for large scale deployment and commercialisation. Further investment in upgraded infrastructure (for electrification or hydrogen) is also essential before the energy transition can be fully realised.

My business, Astrimar Ltd, with its head office in Lethenty (near Inverurie, Aberdeenshire), employs 16 highly skilled professional engineers, plus admin staff, and has been working with such technology developers (in offshore wind, wave, hydrogen generation and distribution, carbon capture and storage, energy storage and electrification) for over 10 years, helping them successfully and sustainably develop their brilliant ideas to market ready solutions, but this takes time, investment, and early adopters of the technologies to make that happen.

The Oil & Gas sector, as well as providing essential expertise to these new technologies, has historically provided a huge amount of investment and technology trials to support the development and validation of the energy transition technologies. However, with the curtailment of innovation relief and block to new wells, it is obvious to me that the appetite and capacity for oil and gas companies to invest in the energy transition have been removed. So, these actions end up having the opposite effect to that intended. Instead of forcing a faster transition, these policy decisions have resulted in slowing the UK's capability for the transition. Instead, investment is being made in more favourable overseas economies, accelerating energy transition technologies in countries other than the UK, at the expense of our homegrown technologies and expertise. It is often said that the UKCS is “running out of oil and gas”, but if the fiscal and policy environment does not encourage exploration of new wells, then our knowledge of available reserves will be curtailed. The comparison with Norway only works if we embrace exploration and drilling of new wells in the same way that Norway does.

In parallel, the increasing reliance on imported energy not only puts 1000s of UK jobs at risk (1000s have already been lost) and removes the revenue to the treasury from homegrown profits but also means that we have no control over the higher carbon footprint of transporting energy from overseas, nor on the environmental practices adopted by these international producers.

By supporting our domestic energy industry, we can secure our energy supply, protect jobs, support investment into technology development and hence ensure a smooth and effective transition to a net-zero future, creating jobs as the technology and infrastructure is able to support, and providing time for highly skilled professional and manual workers to evolve their skills to the new requirements, maintaining the level of expertise, but applied to new areas. The alternative, if the Jackdaw, Rosebank and further North Sea development is not supported, will be the abrupt curtailment of jobs now, before the energy transition jobs are even created, forcing highly skilled workers to claim benefits and learn while unemployed, costing far more to the treasury than the value they could have generated.

Jackdaw and Rosebank are not proposals on the drawing board. More than £3billion has already been invested into their development. Investment made by Adura in good faith, that it will see returns on the investment, pay its taxes on those returns and sustain jobs across Aberdeen, Scotland and the wider UK, to continue to deliver this and other future opportunities. Jackdaw's platform is already installed and nearly ready for start-up, while the Rosebank floating production vessel has already arrived west of Shetland. Hundreds of employees are effectively waiting on the government decision to see if they will still have a job by Christmas.

In my own company, we have seen a direct consequence of the delayed decision on Jackdaw. Innovative engineering design work that had been awarded to us, that was to be co-funded by Adura has been cancelled, as Adura were unable to commit to their share of the costs. We can't help but think it is due to the government delayed decision on Jackdaw and Rosebank, and the lack of certainty in future revenue for the company that has driven their decision to limit expense and this time.

Supporting Jackdaw and Rosebank together at this time will give the projects the potential to:

1. Generate £28.7billion of economic value for the UK, with the majority of benefits flowing to Scotland.

2. Support 3,500 construction jobs, alongside 880 long-term operational roles and 125 apprenticeships.

3. Generate £1.4billion in tax revenues before the end of this Parliament and £3.8billion by 2034.

4. Provide around 10% of UK gas production, with Jackdaw alone capable of supplying enough gas this winter to heat around 1.4 million homes.

As a small business owner, I am having to manage the uncertainty of the UK oil and gas sector on a daily basis. Having recently created 2 new graduate jobs, I am struggling with the uncertainty of where our work will come from that will allow them to develop to professional chartered engineers in the sector and prepare them for a long career in the UK energy sector addressing all energy forms across the long-term energy mix. The same applies to the rest of my staff, in whom we have invested over the last 5, 10, 15 years and for whom we need home grown oil and gas customers as well as home grown hydrogen, offshore wind and carbon capture customers.

I would be grateful if you would hear the informed perspectives of those like myself who are championing the energy transition in the front line of UK industry, and recognise the importance of the Jackdaw and Rosebank as part of the bigger picture in the energy transition, not just assuming importing oil and gas from overseas is cleaner than the oil and gas produced in the UK, just because it wasn't produced here, and recognising the security and treasury benefits of home grown oil and gas as an economic and environmental stepping stone towards the long term energy transition goals.

J0333

Dear Secretary of State,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address

climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction record-breaking temperatures, floods, and wildfires yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

- Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

- Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

- Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0334

Dear Sir/Madam,

I am writing as an individual in response to the consultation on the Rosebank and Jackdaw developments.

I work as a solicitor in the clean energy sector and, alongside my professional career, I serve on the Board of 2050 Climate Group, a charity that supports and empowers young people to take action on climate change and contribute to Scotland's transition to a net zero economy.

Through both my professional work and my involvement with 2050 Climate Group, I regularly engage with people who are deeply concerned about the pace of action on climate change. In particular, many young people within our network feel that the Government is not acting quickly enough to address the climate crisis and that policy decisions are not always aligned with the scale of change required to meet the UK's climate commitments. In a summer where Scotland and Wales have been plagued with wildfires and there have been many excess deaths brought about by extreme heat, it is clear that climate change is a present threat and urgent action should be taken.

In considering these applications, I believe it is important that full weight is given to the principles established by the Supreme Court in Finch v Surrey County Council. The judgment recognised the importance of considering the downstream emissions resulting from the eventual combustion of extracted fossil fuels. These emissions represent the majority of a project's climate impact and should be a central consideration when assessing whether new oil and gas developments are compatible with the UK's climate objectives.

While I recognise the importance of energy security (which there is limited evidence that oil and gas sold on the global market would aid), I believe that future economic growth and investment should increasingly be directed towards sectors that support the transition to a net zero economy. Renewable energy, clean technology and other low-carbon industries are among the fastest-growing areas of the economy and offer significant opportunities for innovation, investment and high-quality employment across the UK.

Many young people are looking for clear evidence that Government policy is prioritising the industries of the future and creating the conditions for long-term sustainable growth. Approving major new oil and gas developments risks sending a conflicting signal at a time when substantial investment is needed in clean energy infrastructure and technologies.

I therefore urge OPRED to give careful consideration to the full climate impacts of these projects, including downstream emissions, as well as the wider implications for the UK's climate commitments and long-term economic transition.

J0335

Dear secretary of state,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

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The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0336

[redacted]
10th August 2026

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

OPRED@Energysecurity.gov.uk

Response to public consultation Ref: [redacted] Jackdaw Gas Field

Dear Secretary of State,

Climate change is an emergency that cannot be ignored. It is essential that we avoid increasing the amount of carbon dioxide and methane in the atmosphere.

Therefore **please disallow the proposed extraction of gas at Jackdaw and seek to persuade the gas and oil companies to invest in renewables instead**.

However, if you decide to allow the proposed extraction of gas, please make it a condition of the licence that **the company extracting the fossil fuel must ensure the capture and permanent storage of carbon dioxide underground**. The amount of CO_2 captured must be sufficient **both** to offset the **CO_2** released by burning the extracted gas **and** to offset the effect of **methane loss** to the atmosphere, bearing in mind that methane traps approximately 100 times as much heat as CO_2 immediately, and 80 times as much over a 20-year period. (Comparisons over a longer timescale are far less relevant; climate change is progressing rapidly and must be addressed urgently.)

This licensing condition would be essential in order to offset the significant adverse effect on the environment caused both by CO_2 from burning the extracted fossil fuel, and by the likely methane release throughout the extraction and supply chain.

The technology exists for this carbon capture and permanent storage, and it needs to be scaled up urgently. The gas and oil companies should fund this mitigation out of their enormous profits. It should not need to be paid for by taxpayers or household bill payers.

Humans have already caused a climate change emergency, and it will worsen still further if more carbon dioxide and methane are released into the atmosphere without **full mitigation**.

The current heatwaves, drought, wildfires and risks to water and food security are clear signs of the need for urgent action to limit and reduce global warming. I write as a concerned member of the public. Your decision affects us all.

Yours faithfully,

[redacted]

J0337

Dear Sir/Madam

Many of the arguments used to justify granting more North Sea oil and gas licences rely on claims about their effect on household bills, energy security and emissions that are inaccurate or misleading. In contrast, shifting to clean energy sources is expected to do far more to strengthen the UK's energy security, cut dependence on imported fuel, and generate jobs with lasting, long-term value.

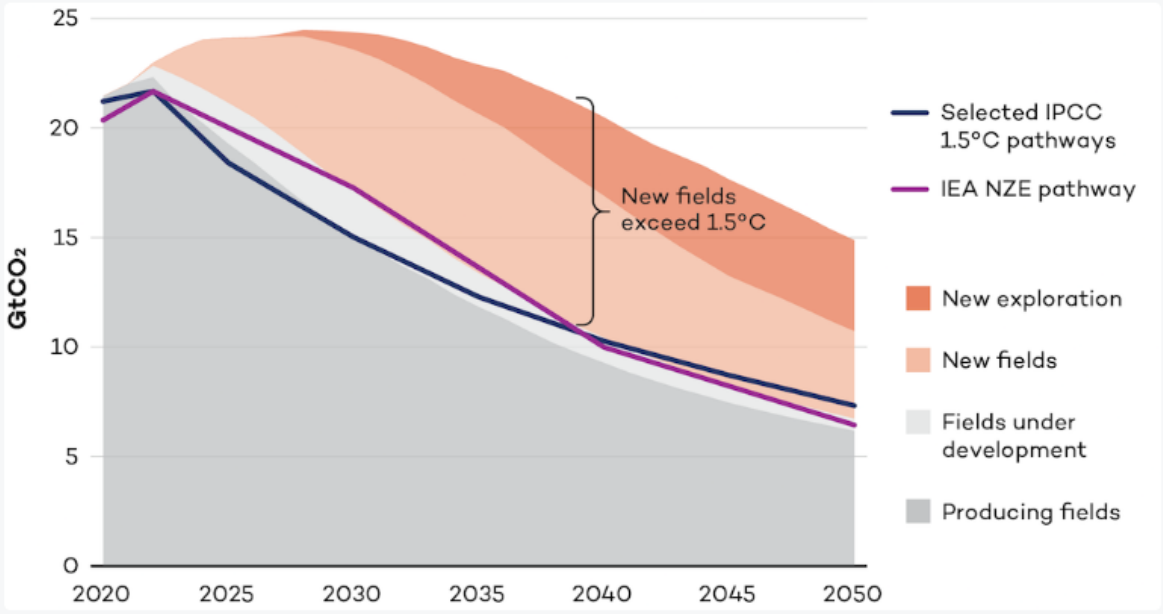
Moreover, and perhaps more importantly the science is unequivocal. We cannot afford opening new drilling sites to keep global heating under control.

Fatih Birol, Director of the International Energy Agency warned us already 5 years ago: *"If governments are serious about the climate crisis, there can be no new investments in oil, gas and coal, from now"*

The well-respected Production Gap report that tracks the misalignment between governments planned fossil fuel production and global production levels consistent with a safe limit in global warming concluded again in 2025 that

"Governments, in aggregate, still plan to produce more than double the amount of fossil fuels in 2030 than would be consistent with limiting warming to 1.5°C. The persistence of the global production gap puts a well-managed and equitable energy transition at risk."

There is a "large consensus" across all published studies that developing new oil and gas fields is "incompatible" with the 1.5C target. The findings, from the International Institute for Sustainable Development (IISD), are based on a comprehensive review of all "feasible" routes to staying below 1.5C. The figure shows that these existing and under-development fields are sufficient to meet demand for oil and gas, if the world follows a 1.5C pathway. Consequently, there would be no space for oil and gas from developing new fields (pink) or from new exploration in licensed reserves (red).



Global CO2 emissions from burning oil and gas, billions of tonnes per year. Shaded areas: Emissions expected from oil and gas in existing fields (dark grey); those already under development (light grey); from new fields (pink); and from new exploration of licensed reserves (red). Lines: Emissions under the median of feasible IPCC 1.5C pathways (blue) and the IEA's 1.5C scenario (NZE, purple). Source: IISD.

Now regarding inaccurate or misleading claims that north sea drilling will lower household bills lower emissions and improve energy security:
1. New licences to explore new fields are not going to make any difference to the prices set by international markets and paid by UK billpayers.

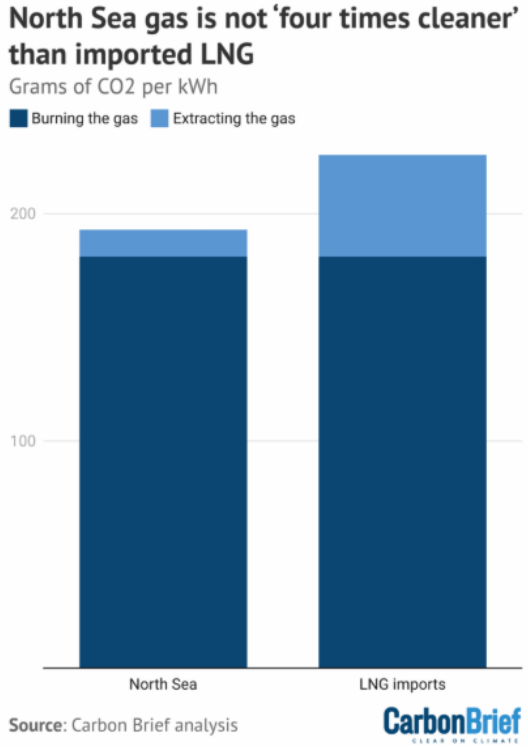
Oil and gas reserves are owned by private companies once licences are issued and the fuel is sold at international rates. Therefore, whether it is produced in the North Sea or elsewhere, its price is driven by the global market.

In 2022, the Climate Change Committee (CCC) wrote that increased UK extraction was not expected to "materially affect global oil or gas prices, as the UK energy market is highly connected to international markets and the potential supply [is] relatively small". (even if all proven UK reserves and resources of gas from new fields were extracted, this would only meet about 1% of European demand each year up to 2050.)
2. Gas produced from the North Sea does not generate a lot less CO2

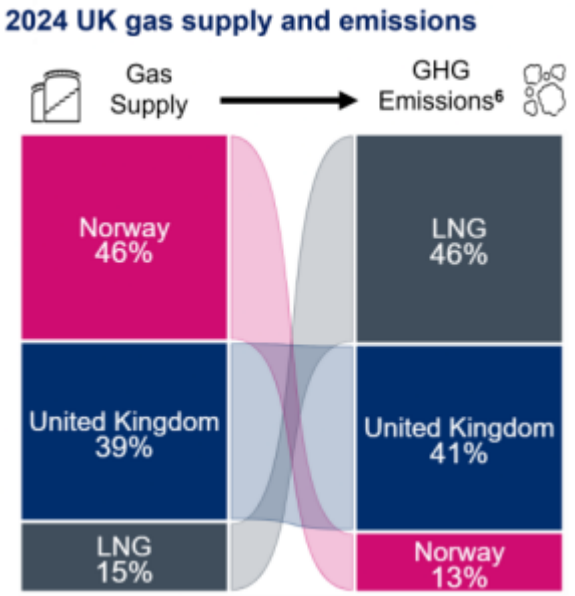
The misleading claim that North sea gas is cleaner is made when comparing the emission to the production emission of the LNG gas which represents 15% of our supply.

However, as the chart below shows, the vast majority of emissions from gas result from burning it to produce energy.

When CO2 from gas combustion is taken into account, North Sea gas emissions are not four times lower than LNG emissions, but 15% lower.



And if we were comparing the carbon intensity of gas production, we should compare our UK production to Norway which represents nearly half of our supply. In which case, as shown by the North Sea Transition Authority, the production carbon intensity of UK-produced gas is more than three times that of gas imported from Norway.



https://www.nstauthority.co.uk/media/nupk5sx1/emissions-intensity-of-producing-natural-gas-factsheet-sept-2025.pdf

3. The best way to provide energy security is to maximise our homegrown energy resources and reduce our demand

The North Sea is a "mature basin", with around 90% of what it contained "already drained dry". Most of what is produced for the basin is now oil, around 80% of which is exported.

Expanding clean-energy supplies would have a larger impact on UK gas imports than an increase in North Sea drilling and demand reduction (such as replacing gas boilers with heat pump, insulating homes and adjusting boiler flow temperature) should be a core focus of UK gas security.

I hope that all the points above will be taken into account in the decision made.

J0338

Dear secretary of state,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.
The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.
The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of

emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.
Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?
There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.
I urge you to reject the Jackdaw oil field and instead prioritize policies that:
Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.
Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.
Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.
The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0339

Dear OPRED,

I am writing as a citizen and environmental scientist to object to the Jackdaw gas field development.

The national and international environmental harms to which it will give rise are not acceptable for a civilised country and supposed climate leader to inflict.

Firstly, it is important to fully recognise that any development will be in addition to extraction that is already taking place both in the UK and internationally. There are those who argue that any gas derived from Jackdaw and other North Sea sites will, in effect, be a form of substituion of gas derived from elsewhere and that is currently imported – and that we should draw on our own sources rather than import. The reality, however, is that further commitment to extraction and the associated emissions will be additive in its effects. It is highly unlikely that, as a result of sourcing additional gas from North Sea,

an equivalent amount of production and extraction would be absent or be lost elsewhere in the world; instead, those other gas-producing companies and nations would simply sell it elsewhere on the open market. In sum, permitting Jackdaw would *add* to the amount of extraction and emissions in the world, not substitute for other sources, and as such, add to the harms associated with carbon emissions.

Adding to the concentration of CO2 in the atmosphere can be directly linked to future deaths from heatwaves and extreme weather, as well as other harms such as food shortages, health burdens and destabilisation of societies. Limiting the amount of fossil fuels extracted and processed in UK territory is necessary to limit these harms. In is furthermore not acceptable to suggest that because Jackdaw constitutes a small proportion of global emissions overall, therefore it is irrelevant. The population of any UK city or town is but a small percentage of the global population, but we would never discount the lives of people living in them as irrelevant as a result, any more than we should discount the certain harms that would arise from additional atmospheric CO2 from permitting Jackdaw or any other development.

Secondly, permitting this development would send the most appalling signal domestically and internationally about the need to urgently transition from fossil fuels. There are countries such as the US under the Trump administration that wish to push for ever more fossil extraction; as such, it is essential that countries that claim to recognise the importance of moving beyond fossil fuels, such as the UK, demonstrate leadership in this area. For the UK to be a climate leader requires that it acts in line with its rhetoric on climate action. It will be clear to the rest of the world that the UK is not serious about climate action and emissions reduction if it permits yet more fossil developments. At future COP talks, the UK will be diminished in its standing and influence.

Permitting additional extraction and burning from Jackdaw would lead to many deaths (Oxfam estimates in the tens of thousands) as well as damage to people's wellbeing in the near and long-term future, and the undermining of global climate action. The calls from vested interests to support their short-term concerns should be resisted in order to safeguard the future of the UK and the rest of the world.

J0340

Dear secretary of state,

I am writing to urge you to please reject the Jackdaw oil field development in this consultation.

My opposition is rooted in two fundamental concerns: the urgent need to address the climate crisis and the unethical profiteering from an issue that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritise profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear - the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction with record-breaking temperatures, floods, and wildfires devastating numerous areas all over the country - yet governments and corporations continue to prioritise short-term profits over the long-term survival of our people and planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies and cares little for the people of our country and children of the future, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy - it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritise policies that:

- Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.
- Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction, a step that prioritises short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0341

Dear OPRED,
As a scientist and emeritus fellow of Kellogg College, Oxford, I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.
I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.
This is no longer an abstract future risk.
The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heat waves more frequent, longer-lasting and more severe.
The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.
These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.
The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.
Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor. However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The increasingly well-established relationship between climate change, extreme heat and premature mortality.

The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

The Government's stated intention to protect the population from the health consequences of extreme weather.

Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were

added on 16 July.
This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.
I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.
I would therefore ask OPRED to explain:
Where and how the current consultation was publicised;
Which newspapers and other media outlets carried the statutory notices;
What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.
The possibility that permission may be given risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.
I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.
I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.
At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.
I look forward to your response.

J0342

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

I am writing to urge you to support and decide in favour of the Jackdaw development, at a key moment in the UK's offshore energy industry and its vital role in our country's financial, home produced energy security.

I am convinced that decisions made now regarding the North Sea will have a lasting impact on our energy security, economy, and our path to Net Zero. In order to support all

objectives, I believe a pragmatic approach is needed, one that prioritises homegrown energy production, protects UK skills and jobs, and provides tax revenue to fund the cost-of-living crisis, defence of our nation, and invest in the technologies and skills development to achieve home grown energy transition of the coming years. A decision in favour of Jackdaw will also reduce our reliance on costly foreign imports, which also result in a significantly higher carbon footprint.

The UK's offshore energy sector supports over 200,000 highly skilled jobs and is a cornerstone of our local and national economy. It is also essential for the energy transition, with the skills and infrastructure in place to, over time, develop cleaner technologies such as carbon capture, hydrogen production and offshore wind, in economically and environmentally sustained ways. It Is a fact that many of these technologies are not yet fully developed, mature or sustainable for the energy transition to be accelerated overnight. They need investment, further development and testing to reliably, safely and sustainably be made ready for large scale deployment and commercialisation. Further investment in upgraded infrastructure (for electrification or hydrogen) is also essential before the energy transition can be fully realised.

My business, Astrimar Ltd, with its head office in Lethenty (near Inverurie, Aberdeenshire), employs 16 highly skilled professional engineers, plus admin staff, and has been working with such technology developers (in offshore wind, wave, hydrogen generation and distribution, carbon capture and storage, energy storage and electrification) for over 10 years, helping them successfully and sustainably develop their brilliant ideas to market ready solutions, but this takes time, investment, and early adopters of the technologies to make that happen.

The Oil & Gas sector, as well as providing essential expertise to these new technologies, has historically provided a huge amount of investment and technology trials to support the development and validation of the energy transition technologies. However, with the curtailment of innovation relief and block to new wells, it is obvious to me that the appetite and capacity for oil and gas companies to invest in the energy transition have been removed. So, these actions end up having the opposite effect to that intended. Instead of forcing a faster transition, these policy decisions have resulted in slowing the UK's capability for the transition. Instead, investment is being made in more favourable overseas economies, accelerating energy transition technologies in countries other than the UK, at the expense of our homegrown technologies and expertise. It is often said that the UKCS is "running out of oil and gas". That is completely false. Norway and UK share the same basin, and with it, the same geology. There is not an imaginary subsea line coinciding with UK-Norway border with all productive wells on Norwegian side and none in UK. That is nonsense. There are significant prospect remaining. Just look at Norway. If the fiscal and policy environment does not encourage exploration of new wells as is the case, then our knowledge of

available reserves will be curtailed. The comparison with Norway only works if we embrace exploration and drilling of new wells in the same way that Norway does.

In parallel, the increasing reliance on imported energy not only puts 1000s of UK jobs at risk (1000s have already been lost) and removes the revenue to the treasury from homegrown profits and taxation but also means that we have no control over the higher carbon footprint of transporting energy from overseas, nor on the environmental practices adopted by these international producers.

By supporting our domestic energy industry, we can secure our energy supply, protect jobs, support investment into technology development and hence ensure a smooth and effective transition to a net-zero future, creating jobs as the technology and infrastructure is able to support, and providing time for highly skilled professional and manual workers to evolve their skills to the new requirements, maintaining the level of expertise, but applied to new areas. The alternative, if the Jackdaw, Rosebank and further North Sea development is not supported, will be the abrupt curtailment of jobs now, before the energy transition jobs are even created, forcing highly skilled workers to take their highly sought skills overseas, or claim benefits costing far more to the treasury than the value they could have generated.

Jackdaw and Rosebank are not proposals on the drawing board. More than £3billion has already been invested into their development. Investment made by Adura in good faith, that it will see returns on the investment, pay its taxes on those returns and sustain jobs across Aberdeen, Scotland and the wider UK, to continue to deliver this and other future opportunities. Jackdaw's platform is already installed and nearly ready for start-up, while the Rosebank floating production vessel (FPSO) has already arrived west of Shetland. Hundreds of employees are effectively waiting on the government decision to see if they will still have a job by Christmas.

In my own company, we have seen a direct consequence of the delayed decision on Jackdaw. Innovative engineering design work that had been awarded to us, that was to be co-funded by Adura has been cancelled, as Adura were unable to commit to their share of the costs. This is directly due to the government delayed decision on Jackdaw and Rosebank, and the lack of certainty in future revenue for the company that has driven their decision to limit expense and this time.

Supporting Jackdaw and Rosebank together at this time will give the projects the potential to:

1. Generate £28.7billion of economic value for the UK, with the majority of benefits flowing to Scotland and UK.

2. Support 3,500 construction jobs, alongside 880 long-term operational roles and 125 apprenticeships.

3. Generate £1.4billion in tax revenues before the end of this Parliament and £3.8billion by 2034.

4. Provide around 10% of UK gas production, with Jackdaw alone capable of supplying enough gas this winter to heat around 1.4 million homes.

5. Reduce reliance on costly and carbon heavier imports

As a small business owner, I am having to manage the uncertainty of the UK oil and gas sector on a daily basis. Having recently created 2 new graduate Engineer jobs, I am struggling with the uncertainty of where our work will come from that will allow them to develop to professional chartered engineers in the sector and prepare them for a long career in the UK energy sector addressing all energy forms across the long-term energy mix. The same applies to the rest of my staff, in whom we have invested over the last 5, 10, 15 years and for whom we need home grown oil and gas customers as well as home grown hydrogen, offshore wind and carbon capture customers.

I would be grateful if you would hear the informed perspectives of those like myself who are championing the energy transition in the front line of UK industry, and recognise the importance of the Jackdaw and Rosebank as part of the bigger picture in the energy transition, not just wrongly assuming importing oil and gas from overseas is cleaner than the oil and gas produced in the UK, just because it wasn't produced here, and recognising the security and treasury benefits of home grown oil and gas as an economic and environmental stepping stone towards the long term energy transition goals.

J0343

Objections to the Jackdaw licensing

I am 65, and this summer is the hottest that I can remember. It's making life difficult for many people and causing destruction through the massive wildfires that are sweeping through Europe and many parts of the world. Global warming seems to be speeding up and leaving countries less able to cope with the impact of climate change. It seems like we are getting to a tipping point where we will not be able to contain global warming.

Licensing further extraction of the Jackdaw field would give completely the wrong signal. It would signal that the drive towards sustainable renewable energy could be paused, no longer prioritised, leading to reduced investment, fewer jobs in renewables and a weaker economy.

The emissions from the output from the Jackdaw field would contribute to global warming. There would be very limited benefit in terms of local employment, and no impact on the price of UK energy bills. This development would do nothing to address fuel poverty in the UK.

A decision to allow further extraction at the Jackdaw field would be like putting your head in the (very hot) sand, not facing up to the facts. We need to do all we can to mitigate the effects of global warming, find sustainable solutions that help people to live, work and have a viable future in the UK.

J0344

I wanted to express my support for the Jackdaw project in the hope that it still can be brought online.
My main reasons are the fact that this country is still a nett importer of oil and gas and if this project is halted we still require oil and gas as the transition away from oil and gas is still a long way away.
If we were further down the road of becoming carbon neutral I would wholeheartedly be against the idea of using fossil fuels.
The idea that the oil companies should factor in the carbon generated from the oil and gas is fair enough, but at the same time I strongly feel that you should also factor in the same carbon generation of the oil and gas that will still need to be imported to satisfy the country's need for fossil fuels.
At the end of the day there will still be fossil fuel brought into the UK and there should be a figure offset against this.
This should also include the additional carbon used to actually brig the imported oil and gas into the uk.
That in my opinion would be a much fairer and more accurate way to work out the correct amount of carbon added to the atmosphere.
We should be producing our own reserves while we are an importer and at least the country is gaining from the associated revenues and employment which to me is win, win until we are in a position to move away from fossil fuels.
I hope you take my opinions into consideration when you are making your decision.

J0345

Dear Sir,

I've only just discovered that there is a public consultation on this and it closes today. I hope I'm emailing the right place and I'm not too late.

Please this has to go ahead as well as Rosebank. We are currently paying Norway to produce oil and gas. Costing more and losing valuable tax revenue, jobs are being lost, we have no energy security, I could go on and on.

I do everything I can to help the environment, but at present we cannot live without oil and gas. Both are necessary for day today living, please grant the license.

J0346

Thank you for the opportunity to comment on the Jackdaw proposal. Please can I strongly urge the Secretary of State and OGA /NSTA to refuse consent for this project.

I appreciate that you have already received many representations on the project, presenting well-informed and impassioned reasons for refusing consent. This email simply summarises the points that struck me as most important, and adds a few perspectives of my own.

1. Significance of Scope 3 emissions

In March 2026, DESNZ asked the developer for further information - see https://assets.publishing.service.gov.uk/media/69c69832cdfd19de13d0f7de/D_4260_2021_Jackdaw_Reg_12_1__Further_Information_Request_Notice_Redacted.pdf.

This included a request for clarification of how significance had been assessed, pointing to the guidance in the DESNZ Supplementary Guidance [Supplementary_guidance_-_Effects_of_Scope_3_Emissions.pdf],

The developer's response regarding significance is principally in Item 10 of https://assets.publishing.service.gov.uk/media/6a4e0dac895317eadc354515/2026.07.07_-_D_4260_2021_-_Adura_Jackdaw_Further_Information_Reg_12_1_Response_redacted_June_26.pdf.

Unfortunately, this response persists in drawing the same simplistic and erroneous conclusions as in the 2025 Further Information document [https://assets.publishing.service.gov.uk/media/69203f99cf3db184075cfd90/Further_Information_Part_1_-_Scope_3_Emissions_Assessment.pdf]: essentially that climate impacts would not be significant, as they are only a small fraction of global (or UK) totals.

This 'drop in the ocean' argument is not tenable. Comparing emissions from any one development to total global or country emissions (or carbon budgets) will (unless the development is of unprecedented size) give a misleading impression of insignificance, regardless of the real, additive impact on cumulative emissions. On this basis, virtually any project could be considered to have insignificant impact.

The DESNZ Supplementary Guidance states 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 …, because of the obvious difference in scale between individual projects and global emissions levels"* and 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. 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." The developer has not satisfactorily dealt with these considerations.

2. Socio-economic benefits

The developer's claims, arguments and evidence regarding socio-economic benefits are in [https://assets.publishing.service.gov.uk/media/69203f995c394e481336ab61/Further_Information_Part_3_-_Relevant_Information_to_the_Project.pdf] , with updates in [https://assets.publishing.service.gov.uk/media/6a4e0dac895317eadc354515/2026.07.07_-_D_4260_2021_-_Adura_Jackdaw_Further_Information_Reg_12_1_Response_redacted_June_26.pdf]

Estimates and information are provided about factors such as the following:

- *"a peak annual Gross Value Added (GVA) of over £825 million, and over £4.4 billion GVA through its lifetime"*
- *"has contributed over 1,000 direct and indirect jobs on- and offshore to date"* (note the sunk-cost fallacy here)
- *"utilises 117 UK based supply chain companies …"*
- contributions to social and educational programmes.

Such information is of very limited use in decision-making. It is hard to get any useful picture of the value of the claimed benefits. Almost any large engineering project should be able to create jobs and other socio-economic benefits, but there is no comparison with alternative ways of using the developer's expertise, assets and investments. If Jackdaw does not go ahead, the money and resources will not sit idle. Shell and Equinor could, for example, have provided comparisons against the socio-economic benefits of investing in offshore wind (both companies have experience in this area).

I would also urge the Secretary of State to consider carefully evidence presented to the Rosebank consultation by others, questioning whether oil and gas developments actually contribute at all to the UK's finances, given the tax regime, and how far they would improve energy security in reality.

It is even more difficult to weigh the claimed socio-economic benefits against the climate impacts, because socio-economic effects are presented in absolute terms, whereas the significance of climate impact is only assessed by comparison with global or UK totals. Any socio-economic benefits would doubtless also be insignificant in relation to the UK or global economies.

3. Impacts on international co-operation and energy investment

Approving Jackdaw in the face of the increasingly obvious climate emergency would undermine the UK's credibility as a climate leader, and be likely to have an adverse effect on the ambitions and commitment of other countries. It would also damage investor confidence in the UK government's commitment to energy conservation and renewables.

4. GHG intensity of production, transport and processing

Another point that the developers put forward in favour of Jackdaw is that it would have lower GHG intensities (from production, transport, processing etc) than alternatives. (They focus on imported LNG as the alternative to consider.)

This may be true, in the limited sense that Jackdaw could reduce UK Scope 1 and 2 emissions, relative to LNG import. However, because climate change is a global issue, there will only be a climate benefit if Jackdaw production substitutes for other hydrocarbon resources, enabling them to be left in the ground, or at least to be transported and used in ways that have lower carbon emissions than they would in the UK. I have not looked at all the documentation, but the developer does not seem to have claimed that this will be the case in their most recent documents.

Given the operation of the international oil and gas market, it seems more likely that, if Jackdaw goes ahead, the resources that would otherwise be imported to the UK will simply be sold and consumed elsewhere. Jackdaw would add to global supply and hence, most likely, to consumption and emissions.

5. No new oil and gas development is allowable, or needed

The scientifically-informed consensus is that no new fossil fuel extraction projects can be developed if the world is to have any chance of avoiding the most dangerous effects of climate change.

For the above reasons, and many others put forward by others, please refuse consent.

I have similar concerns about the associated, even more damaging, Rosebank proposal, and will respond separately about that.

Thank you for considering this.

J0347

Dear Sirs,

I object to more gas being produced from the Jackdaw field. I do NOT want to die in a heatwave but it is becoming increasingly likely that I might. I have known about the causes of climate change for years and so have the oil and gas companies. Any gas produced will belong to Shell and will NOT bring down energy prices. To continue with oil and gas is lunacy; we are like birds fouling our own nests by continually pumping

CO2 into the atmosphere. I am terrified for my children's and grandchildren's futures. Over 80% of the population are very worried about climate change, yet ministers continue listening to the lies and misinformation poured into their ears by the fossil fuel lobbyists. The evidence has been clear for many decades and now we are seeing tangible proof of it – heatwaves, flooding, drought, spread of diseases, climate migration, ecosystems collapsing… HOW BAD DOES IT HAVE TO GET BEFORE THE FOSSIL FUEL COMPANIES STOP FILLING THEIR OWN POCKETS AND IGNORING THE REST OF HUMANITY? They are sadly mistaken if they think they can escape climate change just because they're rich; nature doesn't care about that and if nothing changes, life will just become unliveable – for them as well.

That is my contribution to the public consultation on Jackdaw. Please put your money into green energy and renewables instead.

J0348

Dear Secretary of State

A summary from your departments Framework Guidance (EIA)-Assessing effects of downstream scope 3 emissions on climate (June 2025) could be:

Mitigation arguments need to be in the context of global GHG emissions-"Vague substitution arguments will not do".

UK North Sea Ltd has made no attempt to provide mitigation, in spite of it being within its power to do so. They could, for instance have said " in recognition of the scope 3 emissions from Jackdaw, our parent company Shell will close down an alternate equivalent size field anywhere in the world as of 2027, 15 years before it's predicted end of life, and we are obtaining permission from the relevant government to do so".

This statement might sound unlikely- I would agree, and suggest this only emphasises the point that the application proposes an unmitigated increase in global GHG emissions.

Thus the decision comes down to the tradeoff between the impact on the environment and wider benefits to the nation.

I suggest the key factor here is timing. The question is not do we want to have or not have the benefits of gas from Jackdaw, but whether now is the best time to use it. The reserves will still be there, and still be controlled by the UK however long we leave it in the ground before extraction.

At present, we have rapidly rising global GHG levels, which are already giving us a rapidly changing climate. The consequences of expanding GHG emissions further right now are unclear, but unlikely to be good.

Deciding that now is not the time to extract and use one of our last remaining gas reserves would be a prudent choice, giving us the ongoing option of exploiting it at a time most beneficial to us and our climate.

At which point we may have more need of it, climate processes be better understood, possible tipping points may be clear or safely discounted, and carbon capture and sequestration processes more developed and deployed.

Furthermore, there is a strong benefit to the nation in being a leader in the new green economy- we led the world into the fossil fuel driven industrial revolution, we can reap economic benefit and influence by leading the way out. Some may argue this is easier if we keep extracting fossil fuel, primarily based on the tax revenue provided. However this is small and declining, £4.5bn for 24/25,:and predicted £2.7 to £4.1bn 25/26 - If we can't step away from new fossil fuel development when it represents such a small fraction of our economy, how can we expect other producing nations to do so? I suggest our engineers and business people are simple sorts, and respond well to a clear message and mission. Approval of Jackdaw, whilst not technically a breach of manifesto, clearly goes against the momentum gained to date.

In summary, in the interest of safety and national benefit, I urge that consent, for now, is declined.

J0349

Dear secretary of state,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of

additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.
Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.
Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.
The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0350

Dear secretary of state

I am writing with a view to permit drilling inthe Jackdaw oil field

My view that it is not in the public interest or furthers the aim of reindustrialising the UK via Green sector.

The many arguments for giving the go ahead are misinformation. For example, it will boost domestic supply even though it's sold on the international market

70 per cent of the UK population are worried about climate change

Future generations will not thank you and will condemn our actions if the go-ahead is given

It realise it takes courage but it is the only thing to do

J0351

Climate Change is unquestionably the greatest threat to this and future generations. Scientific evidence to this effect is clear. The decision about whether or not to open up the Rosebank and Jackdaw fields for the new extraction of oil and gas is likely to be a watershed moment for the UK's future approach to Climate Change. If the government's commitment not to open up new fields for is reaffirmed, it will establish a clear message that this government is serious about its legally binding commitments under the Climate Change Act 2008, that it is concerned about more than just its next term in office, that you are planning for our futures for generations to come.

Conversely, if approval is given for new extraction, it will subsequently prove almost impossible to constrain future extraction - the president will have been set. At best, there would be scramble to 'catch up' on lost emission reductions which the vested interests of high-emission industries, such as the oil and gas industry, will exploit. The UK will lose any chance of achieving its Net Zero targets, and will join other countries in what would inevitably be a 'race to the bottom.' As UN General Secretary Antonio Guterres said in 2022, "We are on a highway to climate hell and our foot is still on the accelerator". "Climate Change" he continued "is on a different timeline and a different scale. It is the defining issue of our age. It is the central challenge of our century."

Financial crises are literally as old as history. Some of the earliest accounts from China, the Middle East, India as well as Ancient Greece and Rome contain numerous references to serious 'money crises'. And doubtless money crises will continue with this and future generations. Other attention-grabbing world events will also doubtless continue. But only if we prevent human-caused climate change from causing a global social and financial collapse, the first signs of which are already with us.

Opportunities of this magnitude are rare for governments. By definition, this is a once in a multiple-generations moment. A moment for a new DESNZ Secretary of State and a

new Prime Minister to show the world that we can and will rise to the challenge, even if it means telling powerful people things they do not want to hear, that we MUST transition from our addiction to fossil fuels to renewable energy. As long as the possibility of maintaining the disastrous status quo remains, those vested interests in 'business as usual' will never cease.

This is the moment to make the only morally correct decision, for the sake of this and future generations, and endorse the current legal position that the Environmental Impact Assessment for Rosebank and Jackdaw are inadequate, that it would be disastrous for global climate, and consequently their development must be rejected.

J0352

You already know the arguments for and against Jackdaw. I'm against. The earth is burning and people are dying because of greedy wealthy powerful companies and their shareholders. Please do not grant the licence.

The Secretary of State for Energy Security and Net zero

J0354

I urge OPRED and the Secretary of State to reject the application for the development of the Jackdaw field.

This application is incompatible with UK's legally-binding climate commitments and the achievement of the Net Zero target. It would undermine the UK's commitment to the Paris Agreement's 1.5°C target and further erode confidence that the UK government is committed to its climate goals, undermining investment and the essential and urgent shift to a low carbon economy.

Jackdaw offers no meaningful contribution to energy security in the UK, reducing import dependency by 1-2% at most. The impacts of fossil fuel extraction and combustion are becoming increasingly widespread, frequent and severe and this trend will continue for decades because of our past exploitation of coal, oil and gas. We cannot afford to continue to use fossil fuels without putting all life and human well-being in further jeopardy.

Jackdaw might seem small in a global context but the lifetime scope 3 emissions are significantly higher than Ghana's total territorial annual emissions from a population of over 34 million people. Refusing the application is not sufficient to meet even just the UK's target for emissions reductions - but it is absolutely necessary. The future of the energy industry is not fossil fuels but renewables. Investment in skills and technology to create jobs is essential, to help society adapt, thrive and avoid the worst of climate

breakdown. Sadly whilst there are huge profits still to be made in oil and gas, people and the planet will pay the price.

It is in the UK national interest to refuse this application and focus investment and ambition on a low carbon economy and society adapted to a more challenging climate. I hope that the Secretary of State will put the welfare and future of the nation above private, short-term business interests.

J0355

I support the approval of the Jackdaw gas field. As long as we use oil and gas within the UK, we should prioritise the production of domestic hydrocarbons over imports for so many reasons that have been published recently.

J0356

Dear OPRED,

Europe is literally on fire, yet this is the best weather we will have as global warming increases.

I do not support increasing North Sea extraction. According to research by Oxford University, North Sea extraction is an ineffective way of bringing down household bills, reducing them by only £82 a year compared with £441 from green technologies. Also, while gas may still have a small role in the future, we should be moving quickly to a much more diverse energy mix. This includes ramping up forms of renewable energy that provide consistent power, such as tidal power, and expanding battery storage solutions for our energy needs, as well as solar and wind.

Do not open Jackdaw, I beg you. It would be a betrayal of your climate commitments - the reason why I voted Labour.

J0357

Dear Sir or Madam

I wish to make clear my opposition to the Jackdaw Field Development.

As I write this, three quarters of the country is in drought, unprecedented fires have raged across Europe, we are entering our fifth heat wave this year, heat records are rising and around 3000 people have died from the heat in the UK alone. Our food security is also under threat. This has all been caused by greenhouse gas emissions, so the idea that the government should give the go-ahead to more emissions is bizarre. We should remember that the UK has already declared a climate emergency. Pouring more fuel on the fire is not a valid response to an emergency.

This has everything to do with the massive profits made by the fossil fuel companies and nothing to do with energy bills or energy security. The Jackdaw field can only add more greenhouse gases to the atmosphere; the fuel price will be set by the international market and the war in Iran has shown that reliance on fossil fuels undermines our energy security.

Please do not allow Jackdaw to go-ahead.

J0358

Dear OPRED,
I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.
I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.
This is no longer an abstract future risk.
The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.
The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.
These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of our society.
The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.
Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.
I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.
The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.
I am concerned that this approach risks obscuring the fundamental issue.
Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.
Indeed, the Jackdaw assessment itself acknowledges this causal relationship.
Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.
I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:
The rapidly deteriorating climate conditions being experienced in the UK and internationally.
The increasingly well-established relationship between climate change, extreme heat and premature mortality.
The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.
The Government's stated intention to protect the population from the health consequences of extreme weather.
Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.
I am also deeply concerned about the timing and visibility of the present consultation.
According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.
This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.
I would therefore ask OPRED to explain:
Where and how the current consultation was publicised;
Which newspapers and other media outlets carried the statutory notices;
What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.
I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.
I am raising a public-health concern.
As a member of the public who volunteers not only in the social care sector but also as an advocate for Wildlife, Environment and Biodiversity, I have been following the climate crisis with increasing concern over the last decade, and have become alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.
The climate emergency is a health emergency.
The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.
That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.
I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.
I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.
At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, disruption to food and water security, and disproportionate harm to older people children and those already living with health inequalities. In this context, I'm concerned that an assessment of Jackdaw which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate considerations: protecting the population from climate change must be regarded as a fundamental public health responsibility.

I look forward to your response.

J0359

Dear Secretary of State,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK’s own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.
I urge you to reject the Jackdaw oil field and instead prioritize policies that:
Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.
Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.
Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.
Thank you for your time and consideration. I look forward to your response.

Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
Department for Business, Energy and Industrial Strategy
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

By email: OPRED@Energysecurity.gov.uk

10 August 2026

Dear Secretary of State,

Jackdaw Field Development – Ref. D/4260/2021 - Uplift Consultation Response

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 Jackdaw Field Development (**Jackdaw Project**) for which Adura has made an application for consent to the Oil and Gas Authority (OGA, operating as North Sea Transition Authority (**NSTA**)).

2. In reviewing the Jackdaw Project's Further Information dated 19 June 2026[1] (the "**19 June 2026 Further Information**") required under the Regulations 12(1) Notice dated 27 March 2026[2] (the "**27 March 2026 Regulation 12(1) Notice**"), we consider that it fails to comply with the requirements of the Offshore Oil and Gas Exploration, Production Unloading and Storage (Environmental Impact Assessment) Regulations 2020 (**EIA Regulations**[3]) 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**[4]). Granting consent by taking into account the information in this EIA would breach Regulations 4 and 14.

3. Adura has not remedied the significant shortcomings in their previous Further Information response, and as a result, Uplift's previous consultation submission remains fully applicable. In addition, it is unclear whether the 19 June 2026 Further Information has been prepared by competent experts in accordance with Regulation 8(3). A statement from the developer outlining the relevant expertise or qualifications of such experts is not provided. The developer cannot rely on any previous statement as this information has been produced by a new entity (Adura).

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[1] https://assets.publishing.service.gov.uk/media/6a4e0dac895317eadc354515/2026.07.07_-_D.4260_2021_-_Adura_Jackdaw_Further_Information_Reg_12_1_Response_redacted_June_26.pdf
[2] https://assets.publishing.service.gov.uk/media/69c69832cdfd19de13d0f7de/D.4260_2021_Jackdaw_Reg_12_1__Further_Information_Request_Notice_Redacted.pdf
[3] Offshore Oil and Gas Exploration, Production, Unloading and Storage, Environmental Impact Assessment Regulations 2020 (SI 2020/1497) (EIA Regulations).
[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,

(i) Missing assessment of Schedule (6)(4)(f) and 6(5) factors

4. An ES must identify, describe and assess a project's likely significant effects by reference to the environmental baseline and its likely evolution over the project lifetime, including indirect effects on the factors in Schedule 6(5)(a) (population and human health, land, water, climate, biodiversity, cultural heritage, and others) in the UK and/or globally.[5] Schedule 6(5)(a)(iv) imposes a further legal requirement to assess the likely significant effects of the project on the interaction between the factors referred to in paragraphs (i)-(iv). The 19 June 2026 Further Information does not assess the indirect effects of the project's greenhouse gas (**GHG**) emissions on the Schedule 6(5) factors.

5. The developer describes various future warming scenarios, but does not treat these as a baseline for the purposes of assessment, in accordance with Schedule 6(3), 6(4) and 6(5) of the EIA Regulations.[6]. Instead, the 19 June 2026 Further Information describes scenarios depicting how the climate might evolve in the future, without assessing likely significant effects attributable to the project against the baseline scenario and its likely evolution. The 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. The result is that there is no project-specific baseline for future compliance or monitoring.

6. The European Court of Human Rights (**ECtHR**) has held that Article 8 European Convention on Human Rights (**ECHR**) requires Contracting States, when deciding on petroleum extraction, to conduct a rigorous and comprehensive EIA, undertaken in good faith and based on the best available science, before authorising potentially dangerous activities that may seriously affect individuals' life, health, wellbeing and quality of life through climate change.[7]

7. For petroleum production, the SoS must assess whether the activity is compatible with the State's national and international obligations to take effective measures against adverse climate impacts.[8] That compatibility assessment cannot be made without a project-level evaluation of the project's emissions and their significance. The ECtHR's approach (and the EIA Directive framework) requires assessment of cumulative GHG emissions from all projects combined. A purely project-by-project approach that avoids cumulative assessment is not permitted.[9]

8. Subsequent case law clarifies that EIA alignment requires assessing whether the project is compatible with the remaining 1.5°C carbon budget and assessing the indirect effects of GHG emissions on the Article 3 receptors (mirrored in Schedule 6(5)).[10] Expert evidence in those proceedings[11,12]shows project-level emissions can be attributed to

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[5] As above, note 4

[6] As above, note 4

[7] Greenpeace Nordic and Others v Norway [2025] ECHR no. 34068/21 para. 318

[8] ECHR, above note 8, para. 319

[9] ECHR, above note 8, para. 336

[10] Borgarting Court of Appeal, Oslo, Case 24-036810ASD-BORG/02, 14th November 2025, para. 6.1

[11] Expert opinion related to case number 24-036810ASD-BORG/02 Brussels, 23/06/2024

[12] 1 Expert report at the request of the law firm Simonsen Vogt Wiig in case 24-036810ASD-BORG/02 Dr Rupert Stuart-Smith* Senior R

specific impacts because global temperature rise scales[13] near-linearly with cumulative CO_2 emissions, and temperature rise drives quantifiable physical and socio-economic harms (e.g., heat-related deaths, additional heatwaves and extremes, sea-level rise, glacier loss, and economic losses).

9. 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.[14]

10. 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*".[15] 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.[16]

11. The standard to which already industrialised nations are held is stringent,[17] given their historic contributions to cumulative GHG emissions and the principle of common, but differentiated, responsibilities and respective capabilities (**CBDR-RC**).[18] 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.[19]

12. 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.[20] 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.[21]

13. 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*".[22] The ICJ Advisory Opinion (**AO**) also accepts the IPCC's data on the links between human contribution to climate change and harms such as

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[13] IPCC. 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 (eds V. Masson-Delmotte et al.) pp. 3-32, Cambridge University Press. (IPCC, 2021)

[14] International Court of Justice (ICJ) (2025). *Advisory Opinion: On the Obligations of States in respect of Climate Change,* ICJ Case No. 187 *"While advisory opinions are formally non-binding, the ICJ is the UN's principal judicial organ, and its authoritative interpretations of treaty obligations carry profound normative weight. The UK is a dualist states, so international law is not automatically incorporated into domestic law, but the ICJ's AO is highly persuasive as to the proper interpretation of the UK's international obligations."*

[15] ICJ, above note 14, para. 73.

[16] ICJ, above note 14, p.131, para. B(a).

[17] ICJ, above note 14, para. 138.

[18] ICJ, above note 14, para. 137.

[19] ICJ, above note 14, para. 136.

[20] ICJ, above note 14, paras. 252, 428.

[21] ICJ, above note 14, para. 427.

[22] ICJ, above note 14, para. 137.

heatwaves, flooding, drought,[23] as well as human health.[24]

14. Given the scientific basis for quantification and attribution, apportionment uncertainty is not a lawful basis for the avoidance of assessing project-level likely significant effects (including indirect effects on Schedule 6(5) factors and the interaction of climate change with those factors) and cumulative/carbons-budget compatibility.

15. The 19 June 2026 Further Information is legally inadequate because it substitutes a description of scenarios depicting how the climate might evolve in the future for the required, best-available-science, project-level assessment of likely significant effects (including indirect effects on Schedule 6(5) factors), and it fails to provide the cumulative and 1.5°C carbon-budget compatibility assessment necessary for lawful decision-making on petroleum extraction.

(ii) Failure to assess the cumulative effects of the project

16. The 19 June 2026 Further Information fails to comply with the EIA Regulations and the Supplementary Guidance in evaluating cumulative effects of the project. Paragraph 4 of Schedule 6 of 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*".

17. 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). It is not explicit on the methodology for doing so.

18. The 19 June 2026 Further Information fails to provide a lawful assessment of cumulative effects because it does not account for existing and committed production from operating or in-development fossil fuel projects. It fails to distinguish between total modelled oil and gas demand in pathways and the portion of that demand already met by existing or approved projects' supply over their lifetime, obscuring a proposed new development's additional impact. As a result, the analysis fails to situate Jackdaw's scope 3 emissions within a cumulative global context.

19. As set out in Uplift's previous submissions (see attached), 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

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[23] ICJ, above note 14, para. 437.

[24] ICJ, above note 14, para. 78

models (Figure 1). This approach 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.

20. This cumulative approach, consistent with methodologies adopted in the International Energy Agency (**IEA**) World Energy Outlook (**WEO**) scenario analyses,[25] International Institute for Sustainable Development (**IISD**) report on navigating energy transitions,[26] and University College London (**UCL**) report on climate implications of new oil and gas fields in the UK,[27] and peer-reviewed literature on establishing an accurate baseline,[28] would enable a meaningful assessment of whether the addition of the Jackdaw Project's production is compatible with Paris-aligned pathways.

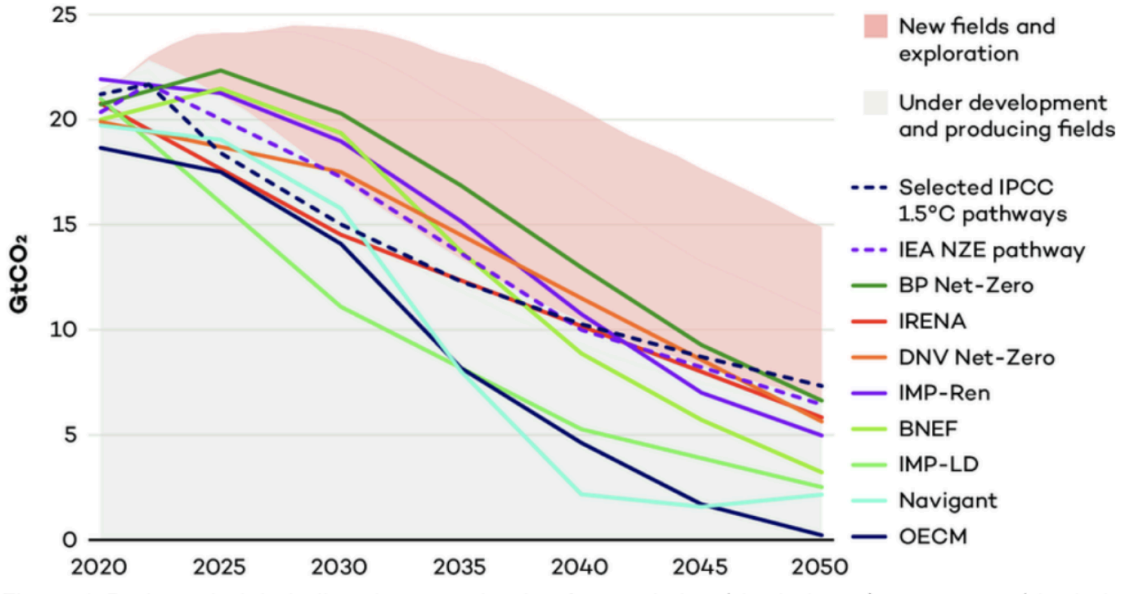

Figure 1: Projected global oil and gas production from existing (shaded grey) versus new (shaded pink) fields, compared to oil and gas consumption in 1.5°C scenarios. Source: Muttitt *et al* (2025), reproduced from IISD Navigating energy transitions 2022.

21. 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 in Uplift's previous submission 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 Jackdaw Project's scope 3 emissions would conclude that there is no remaining allowance for the Jackdaw Project within Paris-aligned pathways, and, therefore, the project is not compatible with the UK's obligations under the Paris Agreement. In order for the UK properly to comply with its

[25] International Energy Agency (IEA) (2025), World Energy Outlook 2025.
[26] International Institute for Sustainable Development (IISD) (2022). Navigating Energy Transitions: Mapping the road to 1.5°C | International Institute for Sustainable Development.
[27] Muttitt G, Green F and Pye S (2025). The Climate Implications of New Oil and Gas Fields in the UK
UCL Policy Lab, UCL Energy Institute & UCL Department of Political Science.
[28] 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

international obligations (explained in the ICJ's AO above), this reality needs to be confronted.

22. Overall, the developer has failed to use modelled pathways in a way that identifies the proportion of production that originates from existing or approved fields, as opposed to new developments. As a result, they have failed to situate the Jackdaw Project's scope 3 emissions within a cumulative global context.

23. The significance of a project's downstream GHG emissions should be assessed relative to the available space in the **remaining 1.5°C global carbon budget**, once existing and committed fields have been accounted for, in the usual way, with information provided as at the time of the EIA and updated as required at the time of project determination.

24. The 19 June 2026 Further Information states that *"the estimated remaining global carbon budget from the beginning of 2025 that give (sic) a 50% chance of limiting warming to 2°C is circa 1050 Gt CO2 (Forster, 2025; Friedlingstein et al. 2026). These figures are considerably higher than the estimated 0.0358 GT CO2e Jackdaw Scope 3 emissions (Shell, 2025), demonstrating that* ***the project alone*** *will not materially influence global carbon budgets. How quickly remaining global budgets will be spent will depend on the actions of the international community as a whole and will likely continue on a similar trajectory with or without the Jackdaw Project*".[29]

25. There are several problems with this statement. First, it applies the wrong temperature goal. By using a 2°C budget, the analysis does not select a temperature target aligned with the Paris Agreement's temperature goal. While the original text of the Paris Agreement provides for limiting the global average temperature "*well below 2*°C" and, pursuing efforts to limit the temperature increase to 1.5°C, the ICJ AO has confirmed that "***1.5°C has become the scientifically based consensus target under the Paris Agreement***" and that the 1.5°C threshold represents the Parties' agreed primary temperature goal.[30] Any assessment which relies instead on a 2°C budget would be in clear conflict with the UK's international obligations. Therefore any choice of a comparator trajectory, for ISEP section 6.3 and Box 3 purposes[31], which is not aligned with 1.5°C, requires justification for choosing a route that assumes the UK will not meet its international obligations.

26. Furthermore, the remaining carbon budget against which the project should be compared must begin with a realistic baseline (i.e. the current position) and calculate the remaining budget in order to achieve limiting the temperature increase to 1.5°C – otherwise, again, the choice would assume failure to comply with international obligations.

27. This approach is even more important where there is evidence that we are currently off track to limit temperature increase to 1.5°C. Such evidence does not justify the use of higher degrees of warming in EIA, thus effectively baking in missing the 1.5°C goal and thus baking in the very serious adverse impacts this will have on people, the economy and on the factors listed in Schedule 6(5). Evidence that we are currently off

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[29] As above, point 1, page 58

[30] ICJ, above note 13, 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)"*.

[31] ISEP 'Assessing Greenhouse Gase Emissions and Evaluating their Significance' Edition 2.1. April 2026 with Supplementary Guidance, Section 6.3

track means that greater effort is required to avoid every percentage of a degree of warming, in order for temperatures to be brought back below a 1.5°C rise as quickly as possible or to limit overshoot to a low as possible. The UK evidence, in particular the Climate Change Committee's (**CCC**) most recent statutory climate risk assessment, shows that each increment of warming above 1.5°C costs disproportionately more to the economy.

28. In addition, the probability used here of "*a 50% chance of limiting warming*" does not meet the precautionary principle, as this probability is equivalent to a coin toss. The precautionary principle underlies the EIA Directive (per the Supreme Court in *R (Champion) v North Norfolk* [2015] 1 WLR 3710 at §51) – it therefore also underlies the EIA Regulations. Domestic legislation for the protection of the environment derived from EU Directives should be interpreted purposively in light of the precautionary principle, and the jurisprudence of the Court of Justice of the European Union continues to be relevant to the interpretation of this legislation: *CG Fry and Son Ltd v Secretary of State* [2025] UKSC 35; [2026] 1 All E.R. 615 at §§50–51. Choosing a probability of a 50% chance of limiting warming is contrary to the precautionary principle – a properly precautionary approach needs at the very least to assess against a range of chances, with 50% being the least precautionary and higher chances of limiting warming (60%; 70%; 80%) presented, with higher percentages being more properly precautionary.

29. Furthermore, the primary temperature obligation under the Paris Agreement is to limit warming to 1.5°C. However, if a developer selects a temperature target above 1.5°C, then the probability or likelihood of meeting that target is even more critical and should be >90%; the high-confidence standard published annually by the IPCC (or indicators of Global Climate Change (**IGCC**)).

30. Secondly, the statement fails to account for existing and committed fields and the concept of available space. The relevant question is not the share of a gross, pre-commitment total, but the share of a residual budget actually available for new approvals at the time of determination. Thirdly, it relies on improper 'project only' framing. Setting Jackdaw's scope 3 estimate of 0.0358 GT CO2e against a global total to argue immateriality isolates the project from the cumulative problem to which it contributes. Climate impact is the sum of additional increments. The SoS's decision-making task is to evaluate the incremental effect of approving this project on the remaining budget, not to ask whether, in isolation, this project exhausts it. Finally, it introduces a fallacy of collective action and inevitability. The assertion that the carbon budget will be spent similarly with or without the project conflates uncertainty about global collective action with the legal and analytical duty to assess the incremental consequences of the decision at hand.

31. Another approach to robustly assess a new proposed development in the context of global committed emissions from existing production is a carbon budget approach, as outlined by Horen Greenford et al. in *Nature* (forthcoming).[32] This study provides a detailed methodology for assessing the climate compatibility of UK oil and gas extraction projects against Paris Agreement climate targets. A reproducible methodology is outlined to assess the climate compatibility of an oil and gas project's scope 3 emissions, as required in the EIA process, against the remaining global carbon budget. The paper assesses the emissions of oil and gas projects, cumulatively, stacked on top of

[32] Pre-print version of Daniel Horen Greenford *et al*, Robust climate test for fossil fuel supply under the Paris Agreement, 7th May 2026.

committed-to UK oil and gas reserves and resources emissions. By stacking the emissions from a proposed project on top of existing committed-to reserves and resources emissions, the project is assessed cumulatively, representing a worst-case scenario where committed-to production is assumed to continue for the entire life of its production.

32. The emissions of a field plus committed-to emissions (with different stacked versions accounting for regulatory timing, such as the sequence of field approvals) are measured against 'climate tests'. The 'climate tests' divide the remaining global carbon budget into specific allocations for UK oil and gas extraction. The paper provides a reproducible methodology for partitioning the remaining global carbon budget by fuel type, using proportions from IPCC AR6 1.5°C mitigation scenarios. The proportions reflect phase-out rates in Paris-compliant pathways, where coal declines the fastest and gas slowest. The remaining global carbon budget is allocated to the UK depending on what a given 'climate test' prioritises. The climate tests span dimensions of climate adequacy, techno-economic feasibility, and international equity. Developers choosing this approach should clearly justify their selection of climate test in the EIA for transparency.

33. Across all tests, existing UK reserves alone fail 1.5°C targets. Oil and gas reserves exceed allocations based on current extraction trends by 2.5 and 2.1 times, and exceed equity-based allowances by 3.7-4.9 and 2.9-3.9 times, respectively. Ultimately, this paper supports the conclusion that no new UK oil and gas production can be approved, including the Jackdaw Project, as committed emissions already exceed allowable allocations across all 1.5°C partitionings, whether one prioritises market efficiency, equity, or feasibility.

(iii) Misapplication of the Institute of Sustainability and Environmental Professionals (**ISEP**) Guidance

34. At various points in the 19 June 2026 Further Information, ISEP (formerly IEMA) Guidance[33] is selectively quoted to support analysis, assessment and conclusions on significance. In order for Adura to claim that it is applying the ISEP Guidance, that guidance makes it very clear that it must be applied as a whole. Point 2 of the ISEP 2026 supplement (p.S-3) states:

> *"The guidance (the 2022 guidance and 2026 Supplement, together, Edition 2.1) is intended to be read and applied as a whole, including the approaches to screening, scoping, assessing impacts, determining significance of effects, and recommending mitigation and monitoring. If a statement is made that an assessment has been carried out using or in conformance with this guidance, the guidance must be applied fully. Any exceptions or differences in approach should be transparently described and justified"*.

Selectively citing the ISEP Guidance or applying only parts of it means that the Further Information (and so the ES) fails to apply the ISEP Guidance and so its robustness needs to be judged on that basis.

35. The developer selectively cites elements of the ISEP Guidance to support its proposition that a specific project, such as Jackdaw, cannot be singled out in a cumulative

[33] ISEP (2026) guidance

assessment. Specifically, the 19 June 2026 Further Information states that "*[a]ccording to ISEP, effects of GHG emissions from specific cumulative projects should not be individually assessed, as there is no basis for selecting any particular cumulative project(s) GHG emissions for assessment over any other (ISEP, 2026)*".[34]

36. The relevant paragraph in the ISEP Guidance, which is quoted at Item 6.1, Page 45[35] in the 19 June 2026 Further Information, reads as follows:

> *"Effects of GHG emissions from specific cumulative projects therefore in general should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other"*.[36]

37. The ISEP Guidance does not define "*specific cumulative projects*" in its glossary; the meaning is given by the context. The selected sentence sits in Step 5 of the assessment methodology, under the heading "*Cumulative GHG emissions*", in a passage contrasting GHG assessment with topics such as air quality, where a shortlist of nearby projects within a bounded study area is compiled and assessed alongside the proposed project. The passage explains that, because the receptor is the global atmosphere, there is no defensible spatial basis for compiling such a shortlist, and that cumulation is instead addressed through the contextualisation of the project's emissions[37], which is inherently cumulative. "*Specific cumulative projects*" therefore refers to the other emitting projects that might be considered in cumulation with the project being assessed. It does not refer to the project under assessment, and it provides no basis for declining to assess that project's own contribution or to conclude on its significance. The ISEP Guidance in its entirety exists to do exactly that for an individual project. This reading rests on the text.

38. Individual oil and gas projects are capable of being 'cumulative projects' in the assessment of some other development. In this EIA, however, the Jackdaw project is the subject of the assessment, not a member of the surrounding cumulative set, and the sentence quoted has no application to it. The developer's reading, under which no individual project can be "*singled out*", would apply with equal force to every emitting project everywhere, and would empty both the ISEP Guidance and the cumulative assessment requirement in Schedule 6(4)(e) of content. That is not a suitable interpretation. It is also not a lawful interpretation, given the requirement in Schedule 6(4) of the EIA Regulations that assessment is required of the likely significant effects of the project resulting from the cumulation of effects with other existing or approved projects. The lawful interpretation must be preferred.

39. The same inversion appears in reference to the "*project alone*", where the developer reasons in its discussion on the remaining global carbon budget that "*the*

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[34] https://assets.publishing.service.gov.uk/media/6a4e0dac895317eadc354515/2026.07.07_-_D.4260_2021_-_Adura_Jackdaw_Further_Information_Reg_12_1_Response_redacted_June_26.pdf, p.58

[35] https://assets.publishing.service.gov.uk/media/6a4e0dac895317eadc354515/2026.07.07_-_D.4260_2021_-_Adura_Jackdaw_Further_Information_Reg_12_1_Response_redacted_June_26.pdf, Item 6.1, Page 45

[36] ISEP guidance, Section 5.3, Step 5, p.18

[37] ISEP guidance, Section 6.4, pp.22-24

project alone will not materially influence global carbon budgets".[38] The phrase is repeated on p.59 "*[t]he projected Jackdaw proportion of global GHG emissions is anticipated to be less than 0.02% in any reference year during the lifetime of the Jackdaw Project for the emissions pathways and scenarios bound by SSP1-1.9 to SSP2-4.5. This indicates that the project alone will not materially influence the evolution of future global GHG levels or the impacts attributed to those future GHG levels".* Reasoning of this character, under which no individual source is measurable and therefore no individual source is significant, runs contrary to the ISEP Guidance itself by the principle that all emissions contribute to "*the largest interrelated cumulative environmental effect*"[39] and by the high sensitivity assigned to the receptor.

40. The 19 June 2026 Further Information does not conform to the ISEP Guidance. Accordingly, any claim that relies on purported compliance with that guidance is unsound. An ISEP-conformant analysis - properly addressing matters omitted from the developer's approach (including the absence of mitigation, the high threshold for a "non-significant" conclusion, and the guidance's exclusion of percentage thresholds) - would instead point to the project having significant effects.

(iv) Unsound conclusion of 'minor adverse' and non-significance

41. The 27 March 2026 Regulation 12(1) Notice asks the developer for a clear rationale for developing a new methodology for assessing the likely significant effects of scope 3 emissions, yet none has been provided.

42. The 27 March 2026 Regulation 12(1) Notice notes that the developer defines 'minor adverse' as meaning the project is "*fully consistent with applicable existing and emerging policy requirements and good practice design standards*" and "*fully in line with measures necessary to achieve a trajectory towards net zero*".[40] It notes, in addition, the developer has "*stated that the IEMA approach, combined with the project's (assumed to be receptors) sensitivity [high] and magnitude assessment have been used in a significance matrix (Table 5-6) to assess the likely significant effect of the Jackdaw scope 3 emissions".*[41]

43. However, the ISEP approach does not treat 'policy compliance' or 'well regulated sector' status as sufficient to reach a conclusion of 'minor adverse'. The Guidance is explicit that where a project is unmitigated (as in the case of the Jackdaw project) or only meets do-minimum regulatory standards, locks in emissions and does not make a meaningful contribution to the UK's trajectory towards net zero, that typically indicates moderate or major significant adverse effects.[42]

44. The developer's 'minor adverse' conclusion is reached via a substituted 'pathway-alignment' narrative. The reasoning for 'minor adverse' is essentially:

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[38] https://assets.publishing.service.gov.uk/media/6a4e0dac895317eadc354515/2026.07.07_-_D.4260_2021_-_Adura_Jackdaw_Further_Information_Reg_12_1_Response_redacted_June_26.pdf, Item 10.1, p. 58

[39] ISEP 'Assessing Greenhouse Gase Emissions and Evaluating their Significance' Edition 2.1, April 2026 with Supplementary Guidance, Section 6.1, p.19

[40] https://assets.publishing.service.gov.uk/media/6a4e0dac895317eadc354515/2026.07.07_-_D.4260_2021_-_Adura_Jackdaw_Further_Information_Reg_12_1_Response_redacted_June_26.pdf, p:53

[41] As above point 39, p:52

[42] As above point 38,(p.S-6)

- UK oil and gas is a well regulated industry;
- UK targets are Paris-aligned;
- UK carbon budgets include demand for hydrocarbons to 2050;
- Therefore Jackdaw scope 3 emissions are consistent with policy and good practice, so likely effects are 'minor adverse'.

45. That is not an assessment of the project's scope 3 effects. It is a set of policy-based assumptions and reliance on government support for a given type of project which is an inherently unlawful approach to carrying out EIA in light of *Finch*.[43] It is evidently also not an assessment of the project's scope 3 effects using ISEP's significance criteria. If the developer considers the ISEP mitigation-based framework inapplicable to upstream oil and gas, this must be transparently described and any deviations from it justified.[44] No such justification is provided.

46. The developer's "*minor adverse, non-significant*" conclusion is therefore unsound because it is reached by adopting an unexplained, outcome-driven methodology change and substituting a policy-compliance narrative for the ISEP Guidance's mitigation and trajectory-based significance test.

(v) Failure to consider likelihood of pathways and alignment with 1.5°C

47. In the 27 March 2026 Regulation 12(1) Notice, the developer is asked the following question, reproduced in full for ease of reference:

> *"Item 10. Pages 26 and 27 – Section 5.4.2.1 – [Significance Assessment of Jackdaw emissions] Global Future Estimates of Carbon Emissions – The assessment against global future estimates of carbon emissions refers back to the IEA APS and NZE scenarios and states that the project emissions are very small proportions of these scenarios and the emissions are not considered to have a likely significant effect on the ability of states to meet global Paris aligned emission pathways that limit warming to 1.5°C. The effects of the project scope 3 emissions have therefore been concluded to be 'Minor adverse' and therefore not significant in line with the matrix set out at Table 5-6. 'Minor adverse' is described as 'GHG impacts would be fully consistent with applicable existing and emerging policy requirements and good practice design standards for projects of this type. A project with minor adverse effects is fully in line with measures necessary to achieve a trajectory towards net zero.'. As previously stated, the IEA scenarios do not have a likelihood attached but the assessment of significance relies on these pathways as reasonable future estimates of global GHGs affecting climate over the lifetime of the project (and the APS scenario is not aligned with a 1.5°C pathway). Furthermore, characterising the emissions from the project solely in numeric terms against global GHG emissions does not provide a meaningful expression of the global effect of those scope 3 emissions.*
>
> *It is unclear how the project is considered to be fully in line with measures necessary to achieve a trajectory towards net zero and therefore how the*

[43] *R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents)* [2024] UKSC 20. (§§108 and 151)
[44] ISEP supplement Point 2, p.S-3

project scope 3 emissions are aligned with the 'Minor adverse' significance criteria. Please clarify."

48. The developer does not address the substance of the question. The challenge was to the developer's reliance on IEA Announced Pledges Scenario (**APS**) and Net Zero Emissions (**NZE**) scenarios to underpin a significance conclusion when those scenarios are expressly exploratory and non-probabilistic, with APS in particular not aligned to a 1.5°C pathway. While the developer concedes that these scenarios have no attached likelihood, it does not explain how they can logically support a conclusion framed in likelihood terms that effects are "*not considered to have a likely significant effect*". Nor does the developer justify treating APS as a Paris-aligned benchmark given its non-alignment with 1.5°C, or explain why presenting the project's emissions as a small fraction of global totals is a meaningful indicator of global climate effect or of consistency with Paris-aligned pathways.

49. Further, the asserted 'minor adverse' conclusion remains unsupported. According to the developer's own reasoning, a 'minor adverse' effect requires the project to be fully in line with measures necessary to achieve a trajectory towards net zero. However, the response substitutes references to UK regulation, national carbon budgets, environmental protection objectives (**EPOs**) and projected hydrocarbon demand, but does not demonstrate that the project aligns with a 1.5°C consistent net-zero trajectory.

50. As set out above, the ICJ confirmed that 1.5°C is the "*scientifically based consensus target under the Paris Agreement*".[45] Achieving the primary temperature goal under Paris requires near-term global reductions, including peaking before 2025 and a 43% decline by 2030. Therefore, only scenarios that are genuinely constrained to, and assessed against, the 1.5°C threshold can rationally be used to evaluate whether effects are significant on a Paris-aligned basis. This is even more strongly the case in light of evidence that we are off track in meeting the Paris 1.5 °C obligation.

51. As explained in the *Cumbria Coal Mine* case,[46] the obligation is on the developer to produce information which is legally essential for a compliant ES (§115, with reference to the equivalent of Regulation 12 of the EIA Regulations). Schedule 6(7) of the EIA Regulations (based on the Directive) require a description of the forecasting methods or evidence used to assess significant effects, including any uncertainties involved. A chosen decarbonisation pathway/scenario is a forecasting method and the developer is required to evidence both why it was chosen and the main uncertainties involved. If a scenario fails to provide information about how likely it is that the scenario will come to pass, that is a serious deficiency and diminishes the robustness and reliability of the scenario and of the assessment based on that scenario.

52. The 19 June 2026 Further Information does not engage with, acknowledge or set out the uncertainties that arise from choosing expressly exploratory and non-probabilistic scenarios. The SoS therefore cannot come to a reasonable conclusion on significance on the basis of the Further Information. The 19 June 2026 Further Information uses pathways not constrained by a 1.5°C temperature goal which reflects a broader failure to recognise

[45] International Court of Justice (ICJ) (2025). *Advisory Opinion: On the Obligations of States in respect of Climate Change,* ICJ Case No. 187, para. 224.
[46] Friends of the Earth and South Lakes Action on Climate Change v Secretary of State for Levelling Up, Housing, and Communities; and West Cumbria Mining [2024] EWHC 2349 (Admin)

1.5°C as the controlling benchmark for Paris alignment - this difficulty with the chosen forecasting method is just ignored.

53. The SoS's decision on whether to approve this project must align with the UK's international obligations as articulated in the ICJ AO and the subsequent UK supported UN General Assembly resolution. Those obligations include exercising due diligence to limit emissions caused by private actors under the State's jurisdiction, including through regulation of fossil fuel production/consumption and related licensing and support measures.[47]

54. Because the developer has (i) failed to engage with the uncertainties of the scenarios it relies upon and so failed to evidence that they are sufficiently robust forecasting methods and (ii) failed to evidence how the project is positioned to meet the 1.5°C temperature goal, the SoS is deprived of a proper evidential basis on which to reach a reasoned conclusion on the project's likely significant environmental effects.

(vi) Claims of 'beneficial net effect' are unsupported

55. The developer states that producing gas via the Jackdaw tie-back is likely to result in lower emissions than importing LNG ("*Producing gas via the Jackdaw field as a tie-back to existing infrastructure (Shearwater host installation) is likely to result in less emissions than the* ***do-nothing case*** *of importing LNG. This indicates that there is* ***likely a beneficial net effect*** *from domestic UK production*")[48] and that domestic production has lower GHG intensity than the global average with Adura expecting Jackdaw to be better than the sector average ("*Benchmarking against global oil and gas production demonstrates that* ***hydrocarbons are produced in the UK sector with lower GHG intensities than the global average****. This shows that meeting the hydrocarbon demand in the UK's Net Zero pathway* ***using domestic production results in lower GHG emissions globally than meeting that demand with imported LNG****. Adura complies with sector initiatives and commitments and anticipates that the GHG intensity of the gas produced from the Jackdaw Project will be better than the sector average*").[49]

56. None of these assertions addresses the mandatory requirement to quantify and assess the project's absolute downstream combustion emissions against the zero-emissions no-project baseline. Nor do they satisfy OPRED Supplementary Guidance[50] evidential requirements for any substitution contextualisation. They assume, without evidence, that LNG is the displaced supply into the UK market.

57. First, this comparison only considers scope 1 and 2 operational emissions. These are dwarfed by scope 3 combustion emissions, which generate the same climate impact regardless of extraction origin. Consequently, scope 1 and 2 emissions are irrelevant when assessing scope 3 significance.

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[47] ICJ, above note 14, para. 427.

[48] https://assets.publishing.service.gov.uk/media/6a4e0dac895317eadc354515/2026.07.07_-_D.4260_2021_-_Adura_Jackdaw_Further_Information_Reg_12_1_Response_redacted_June_26.pdf Item 10.1, page 58)

[49] https://assets.publishing.service.gov.uk/media/6a4e0dac895317eadc354515/2026.07.07_-_D.4260_2021_-_Adura_Jackdaw_Further_Information_Reg_12_1_Response_redacted_June_26.pdf Item 10, page 59

[50] Environmental Impact Assessment (EIA) – Assessing effects of downstream scope 3 emissions on climate, p.12

58. Secondly, the developer's use of LNG as the counterfactual baseline is not the no-project case and is not sufficiently supported, particularly given that in 2025[51] the dominant imported supply's production emissions (scope 1 & 2) were lower-intensity Norwegian pipeline gas at 8 kgCO2e/boe[52] compared to 28 kgCO2e/boe for UK domestic production. The claimed beneficial net effect and any implication that effects are minor or not-significant are therefore unsupported and not in line with the Supplementary Guidance.

59. Overall, we conclude that the 19 June 2026 Further Information does not adequately or lawfully assess the likely significant environmental effects of the Jackdaw Project.

[51] https://assets.publishing.service.gov.uk/media/6a69f4232c4b5ba9d1242a67/DUKES_2026_Chapter_4.pdf
[52] https://www.nstauthority.co.uk/media/nupk5sx1/emissions-intensity-of-producing-natural-gas-factsheet-sept-2025.pdf

J0361

Dear Sir/Madam,

Writing in full support of Jackdaw advancing to production. Rather than being dependent on gas imports from other areas in the world, at higher prices and with associated reputational risks, it is much preferable to operate within our geographical area and be independent. This supports our community from all points of view, keeps skilled workforce at home, secures good jobs for a highly specialised next generation and provides substantial revenue and energy security for the whole of the UK. The projects have been supported and are tantalisingly close to operational status. The only logical outcome is to see them through. They are not a threat – they are a superb achievement.

With my very best wishes,

J0362

For the attention of OPRED,

I do not support increasing North Sea extraction. According to research by Oxford University, North Sea extraction is an ineffective way of bringing down household bills, reducing them by only £82 a year compared with £441 from green technologies. Also, while gas may still have a small role in the future, we should be moving quickly to a much more diverse energy mix. This includes ramping up forms of renewable energy that provide consistent power, such as tidal power, and expanding battery storage solutions for our energy needs.

J0363

To the Business Support Team, OPRED,

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments (references D/4260/2021 and ES/2022/001), made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

I am writing on behalf of myself, as a senior business leader in the drilling contractor community, based here in Aberdeen. I, like many other people who work in offshore drilling services, work responsibly to deliver the energy that is needed to power society. Whilst we still consume hydrocarbon products in our country, we should continue to support projects like Jackdaw and Rosebank. These projects are great examples of how we can responsibly produce the products we consume, whilst maximising the economic benefit for our country. The alternative is to import the hydrocarbons from overseas at a significantly higher carbon footprint, polluting the world faster whilst also losing the economic benefits.

So many well paying jobs and company capabilities are already being lost by the lack of a pragmatic plan forward and timely decision making. Not only are we losing the ability to produce the hydrocarbons needed to maintain our energy security, but we're also losing the capability to move forward with carbon capture and storage projects.

Projects like Jackdaw and Rosebank are critical to maintain our UK supply chain and the jobs and skills within it. On the basis of what they mean for our businesses and their employees, we support the granting of consent.

I would ask that the Secretary of State takes account of representations from the businesses and workforces affected, and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

J0364

Dear OPRED,

I am writing to strongly object to the development of the Jackdaw gas field because of a very well known reason: climate breakdown.

Scientists have been clear: fossil fuels must remain in the ground if we want to maximise the chances of a liveable future. Climate change has been recognised as the greatest threat to human life, yet governments continue to ignore this existential threat.

Instead continue to please the fossil fuel companies which are making obscene profits. This must stop.

Along with big oil companies' profits, temperatures also continue to rise exponentially, year after year, with new record breaking numbers being a new normal. This summer's raging temperatures and droughts in the UK and Europe is a serious alarm bell to all aspects of life, from habitats and biodiversity loss, to food production, and human health/death. During May and June 2026, 2,877 heat-associated deaths in England have been estimated (UK Health Security Agency). I work in healthcare settings and on a daily basis we are working in increasingly challenging situations brought by the effects of extreme heath, not just on patients, but on us all.

The Government has made several statements about committing to protect public health and responding to climate change. Moreover, although very secretatively, has also published the threat which ecological collapse is posing to our national security. Failing to maintain the promises made within the Labour's manifesto, for which people voted for, will be an act of betrayal, and if laws were not orchestrated around corporations and biased politicians, this would be a crime (it is a crime, a crime against humanity and all the species we are displacing and making extinct because of our relentless predatory behaviour).

It has been well established that every additional greenhouse-gas emission will exacerbate climate breakdown. Therefore, comparing the magnitude of Jackdaw emissions to other major sources of emission, as in your scope 3 assessment is inherently flawed and dangerous.

What is also grave is also the fact that the public has been provided with only a very limited period to be able to engage with such important information-consultations, hence formulate a meaningful response. Moreover, this consultation has not been brought to the attention of the public in a way it might be expected for something so important. Therefore, I would like to ask to consider extending the consultation period to allow for as many people as possible to respond.

On another matter, one of the arguments brought forward by the governments and corporations is that this will create jobs. According to research by Oxford University, North Sea extraction is an ineffective way of bringing down household bills,

reducing them by only £82 a year compared with £441 from green technologies. The only way to energy security is renewable.

In summary, by allowing the Jackdaw gas field development, you will be committing ecocide and hopefully retrospectively you may be held accountable (https://www.stopecocide.earth/).

We urge you to maintain the elections' promises and not to go ahead with the development of the Jackdaw field.

J0365

I am deeply opposed to the further development or reopening of oil and gas fields in the UK. We and the rest of the planet are clearly in the grip of a climate crisis. Exploiting Jackdaw will not insulate the UK from energy price rises or shocks and we need urgently to focus our efforts on alternatives.

J0366

To the Secretary of State for the Environment

I write as an ordinary citizen who is simply experiencing first-hand the distressing changes in our climate, particularly the increase in temperature over this and recent summers. It is undeniable except amongst those who have a vested interest that this is in large point due to the burning of fossil fuels.

This is therefore a heartfelt plea that the Jackdaw Field Development should not go ahead, and that every financial encouragement be given to the expansion of non fossil-based fuels.

Our descendants will judge us bitterly for ignoring the evidence and giving in to our short-term needs and the profit motive of giant corporations.

J0367

Dear Secretary of State

As we enter the FIFTH heatwave this year, it is clear that the climate is changing because of the burning of fossil fuels.

It is, therefore, clear that we must reduce our use of fossil fuels as quickly as possible.

This is also necessary to fulfil our legal commitments. And it is an opportunity to re-establish Britain's leadership in the world.

We can also take this opportunity to redirect the skills and resources or the Scottish east coast to north sea renewables rather than exhausting and then abandoning them as we did in the coal fields.

Fast transition to net zero is hugely popular among the electorate (about 85%) this is also the best way to develop our economy, rather than hanging on to old technology until China has cornered the market in EVs, batteries, lithium, solar etc.

I therefore ask you NOT to grand consent to the project.

J0368

Dear secretary of state,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK’s own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of

additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0369

Dear Business Support Team, Offshore Petroleum Regulator,

As you must be well aware the impacts of Climate Change are now at our doors, as Britain faces devastating drought, crop production is affected , land burns here and across the world with firefighters are battling devastating fires.

Channel 4 have just today 20.8.26 had a very insightful interview which you might find interesting https://www.youtube.com/watch?v=o8L5ZXBBdjs

Notably the responses to the last question … why is the opening of new gas (& oil) even a matter of discussion?

Allowing Jackdaw will lock in decades more emissions and will

- make the UK knowingly and willingly culpable for climate change deaths around the world and will be a betrayal of UK residents, particularly young people

- be in conflict with international law (blasting through 2degrees of heating

- cost UK taxpayers- the UK has ratified at the UN the recent International Court of Justice advisory opinion on the financial liabilities nations face if they contribute to breaching the 1.5C global heating threshold target.

This isn't about choosing between jobs and the climate. It's about choosing between investing in the industries of the future or doubling down on the industries driving the crisis.

I assume no decision will be made without full consideration of the facts. All involved in the decision making process should be required to watch and take account of the National Emergency Briefing https://www.nebriefing.org/

J0370

10 August 2026

Offshore Petroleum Regulator for Environment and Decommissioning
Department for Energy Security and Net Zero

Re: Consultation on the Jackdaw Gas Field Environmental Permit — Representation

I am writing in response to the reopened consultation on the environmental permit for the Jackdaw gas field. I recommend that the Department grant approval, and set out below the basis for that position, together with a small number of policy measures I ask the Department to carry forward alongside it.

1. Summary of Position

Jackdaw should be approved. This is not on the basis that it will lower household bills — it will not, for reasons set out below. It is on the basis that (a) on a consumption-based accounting of emissions, approval is the lower-carbon outcome relative to the realistic counterfactual, and (b) domestic production, if properly used, strengthens the UK's resilience against the kind of external supply shocks the last four years have made routine. Approval should be accompanied by three further measures, addressed in Section 4, which I ask the Department to raise with HM Treasury and ministerial colleagues as the appropriate mechanisms to realise the full value of this decision.

2. On Price: What Approval Will Not Do

I want to be direct about the limits of this case. Approving Jackdaw will not reduce baseline retail energy prices for consumers on a day-to-day basis. UK wholesale gas is priced off the National Balancing Point and moves with the international market; a single domestic field, even a material one, does not on its own decouple UK prices from that market. Arguments that suggest otherwise do not withstand scrutiny, and I do not make them here.

The case for approval rests instead on resilience, not price — addressed in Section 3.

3. On Energy Security: Resilience, Not Price Insulation

The UK currently holds only around eight days of gas storage. Combined with the ongoing war in Ukraine, the conflict in Iran, and Russia's continued use of pipeline supply as a lever of coercion, this leaves the UK exposed to a narrow set of supply disruptions with limited buffer. Jackdaw could supply up to 6–6.5% of UK gas demand at peak production — enough to heat the equivalent of 1.4 million homes — delivered through existing infrastructure at the Shearwater hub and St Fergus terminal, with no new build required to bring it online.

This resilience case depends on how the gas is used, not merely on its extraction. Sold directly into the open market, Jackdaw's output does little to insulate UK households from a price shock, since it is priced identically to imported gas. Its security value is realised only if a meaningful share is held back from the open market as a deliberate buffer — which is the purpose of the Strategic National Gas Reserve proposed in Section 4. **I ask the Department to treat that mechanism as integral to the case for approval, not a separate ask.**

4. On Emissions: The Consumption-Basis Comparison

I understand the Department's re-assessment follows the Court of Session's finding that the original 2022 consent failed adequately to account for the climate impact of the gas's eventual combustion. I address that question directly, on a consumption basis, since the relevant comparison is not “Jackdaw's gas vs. no gas” — UK gas demand will not fall to meet the shortfall — but “Jackdaw's gas vs. the imported gas that replaces it if Jackdaw is refused.”

On that comparison, approval is very likely the lower-carbon outcome. The North Sea Transition Authority finds that imported LNG carries, on average, roughly four times the supply-chain carbon intensity of gas produced on the UK Continental Shelf, once liquefaction, ocean shipping and regasification are accounted for. The US supplies roughly two-thirds of current UK LNG imports, with Nigeria, Algeria, Trinidad & Tobago and Equatorial Guinea supplying smaller and in several cases growing shares — sources with materially higher methane leakage and processing intensity than UK Continental Shelf production. Refusing Jackdaw does not reduce UK gas consumption; it redirects that demand toward higher-carbon imports.

This is a comparative claim, not a claim that domestic gas is low-carbon in absolute terms. I would encourage the Department to treat it as such in its own assessment: the relevant test is relative to the realistic import counterfactual, not against a hypothetical of reduced demand that approval or refusal of this permit will not itself bring about.

5. Recommendations to Accompany Approval

The following do not form conditions of the environmental permit itself — I recognise that ring-fencing tax revenue and expanding public energy ownership are matters for HM Treasury and primary legislation, not for a permitting decision. I ask that the Department nonetheless convey them, as the policy framework that would allow this decision to deliver lasting value rather than a one-off extraction.

i. Establish a Strategic National Gas Reserve. A defined share of Jackdaw's output should seed a state-backed gas reserve, held back from the open market and drawn down only during supply disruption. Without this, the resilience case in Section 3 is significantly weaker — extraction alone does not insulate UK households from a price shock; a deliberately withheld buffer does.

ii. Expand public capacity in energy infrastructure. Great British Energy's current statutory mandate is investment in clean and renewable generation; it does not extend to control of fossil fuel pricing or flow. I ask the Department to consider, separately, whether a dedicated public vehicle — whether an expanded GBE mandate or another mechanism — should hold a stake in ensuring domestic gas serves UK energy security rather than being sold at the discretion of private shareholders alone.

iii. Ring-fence Jackdaw's tax revenue for demand reduction. Revenue raised from Jackdaw under the 78% Energy Profits Levy and associated corporation tax should be directed toward home insulation, heat pump deployment and grid capacity expansion. This uses a short-term extraction decision to fund the permanent reduction of the demand that decision serves — the most direct route from “more domestic gas now” to “less gas dependence long-term.”

6. Conclusion

Jackdaw should be approved. The case does not rest on lower bills, and I would ask the Department to treat any submission that claims otherwise with appropriate scepticism. It rests on a comparative emissions case that the Department's own evidence on LNG supply-chain intensity supports, and a resilience case that requires the accompanying measures above to be realised in practice rather than assumed. I would welcome the opportunity to expand on any part of this submission.

Yours faithfully,

J0371

To whom it may concern.

I write to provide feedback in the proposed Jackdaw gas extraction project in the North Sea.

The Paris Agreement, uk climate action plan and consensus of world scientists requires Greenhouse Gas emissions to be rapidly reduced in order to deliver no more than 2degrees of warming. A slower pace or increased emissions (or both) will result in a higher level of impact and increased commercial, social and environmental impacts including higher costs for mitigation to address these impacts.

The risk of tipping points also increases with these by nature and definition being irreversible in generational timelines.

The Developers have noted an increased in greenhouse gas emissions and project a 1.89% rise in uk emissions when the Uk is required to reduce emissions. And note themselves that :

In the Paris Agreement, states agreed to "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"20

I object to this development not just myself but on behalf of future generations (my children and yet to be born grandchildren included).

The Developers have brushed off the rise in emissions as insignificant but any rise will drive further climate change and increase greenhouse gases throughout the operating period of the project - EXACTLY THE TIME PERIOD WHERE EMISSIONS SHOULD BE RAPIDLY REDUCED.

The developers make no impact assessment of these increased emissions and therefore have not provided an adequate assessment of impact (to quantify emissions is not to explain the environmental impacts that will arise from increasing Greenhouse gas emissions).

Furthermore Shell were well placed to contribute to emissions reductions through adoption of offshore wind technology. They invested in London Array offshore windfarm and then withdrew from the project and also competed for, and won, seabed leases in the Scotwind Auction and again have withdrawn from this development (in this case delaying the introduction of measures which would decarbonise energy). Their pursuit of the jackdaw development could have been avoided if they had taken an active part in renewable energy development (with higher job creation) so energy security is not their primary concern. Their strategic approach is to maximise profits whilst downplaying the harm that their developments will cause.

They have also proceeded with Development work without Consent/license and without undertaking an appropriate environmental impact assessment.

Finally I note that Jackdaw will create only 27 permanent FTE roles. The damage to the climate is not justified by such a small socioeconomic benefit. Energy security will not be improved as the gas will be sold through international markets which will not bring down prices for consumers.

I object as the assessment provided is incomplete inadequate and unsound.

J0372

There is no basis upon which this application should be allowed.

In the year where we are entering our 5th heat wave, 75% of the nation under drought conditions, less rain than since records began 190 years ago, food scarcity or at lease huge increase in costs is on the horizon, we must stretch every option in reducing our use of fossil fuel.

We have the technology, personally I have remove fossil fuels from my domestic heating and my transport. With the right political will the majority of our population can do the same. We must move away from fossil fuels.

J0373

It's so important first to reduce fuel consumption & invest in renewable fuel sources rather drilling for fossil fuel at Rosebank. Once it's drilled it's gone. This is a last resort and it's not time yet. Please think of your grandchildren's grandchildren and x100 at least.

Do not feel as government that you must compete with the world on this front instead invest in renewable. Do not feel the pressure from the oil lobby. Instead support your local communities with local energy and food production. Do not drill Rosebank.

J0374

Dear Secretary of State

I am writing to strongly urge you not to approve drilling in the Jackdaw gas field.

Although Jackdaw can make a defensible contribution to *short-term* UK gas security, it is a weak answer to *long-term* energy security. The alternative must be to attract faster investment in a reliable renewable system, then the long-term case for accelerating that transition outweighs the case for developing the additional gas capacity from Jackdaw.

In addition, I urge you to end Government subsidies and tax breaks that are afforded to fossil-fuel companies like Adura. Why should we, the taxpayers, subsidise an investment in Jackdaw whose fundamental product contributes to the very fossil-fuel dependence that the Government is simultaneously spending billions trying to eliminate? It's high time that the Government removes fossil-fuel-specific subsidies and tax advantages, makes developers bear the full economic and environmental costs,

and uses the resulting fiscal space to accelerate investments that permanently reduce Britain's dependence on fossil fuels.

Government support should go to investments that deliver the greatest combination of energy security, affordability, emissions reduction and economic value. The investments we need are in Renewables.

Furthermore, the goal of Goverment must be **cheap energy + energy security + decarbonisation**, so I want to see government support used to make **clean electricity abundant and cheap** than use taxpayers' money to maintain a system in which gas remains the price-setting fuel and taxpayers then have to compensate people for the resulting costs.

The real political challenge is that **the benefits of this reform are long-term, while the costs of transition are immediate**. Government needs to redesign the pricing, taxation and subsidy system so that households actually **feel the benefit when renewables become cheaper**.

I am ever hopeful that this Government will act courageously in the long-term interests of the people and the planet.

J0375

Dear Business Support Team,

Please accept this as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments, references D/4260/2021 and ES/2022/001, made further to the public notices of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage Environmental Impact Assessment Regulations 2020.

I am writing on behalf of TechnipFMC plc, a business based in Newcastle Upon Tyne, United Kingdom, employing approximately 22,000 people, **including around 2,000 employees in the United Kingdom,** and maintaining major engineering, manufacturing, project delivery and offshore operations capabilities across the UK.

We are part of the wider North Sea supply chain, providing **integrated subsea production systems, pipelines, risers, umbilicals, subsea infrastructure, engineering, manufacturing, installation and project execution services** to support complex offshore energy developments. TechnipFMC has a long-standing presence in the UK and plays a key role in delivering critical infrastructure for major North Sea projects.

Our interest in these projects is economic and industrial.

TechnipFMC **directly supports** the delivery of both the Jackdaw and Rosebank developments through major contract awards covering the design, manufacture, supply and installation of critical subsea infrastructure. For Jackdaw, our scope includes the pipeline system, riser, subsea isolation valve (SSIV), cooling manifold, umbilicals and associated tie-back infrastructure connecting the field to the Shearwater platform. For Rosebank, TechnipFMC is delivering subsea production systems, flexible and rigid pipes, umbilicals, and associated offshore installation and connection services.

These projects mobilize engineering, manufacturing and project execution teams across the UK and support highly skilled jobs, industrial capability, and long-term investment throughout the UK energy supply chain.

A timely decision on both Jackdaw and Rosebank would provide greater certainty for companies like ours to plan, invest, retain critical skills, and support employment across the UK energy supply chain.

The last period of uncertainty has made business planning more challenging. For supply chain companies, confidence in future project activity is essential to sustain skilled jobs, maintain industrial capability, and make decisions on investment, recruitment, training, and apprenticeships. Without timely consent, there is a risk that capacity, expertise, and investment across the North Sea supply chain will be delayed, reduced, or redirected.

These projects matter beyond the individual developments. Together, Jackdaw and Rosebank represent a significant economic and industrial opportunity for the UK supply chain, supporting jobs, skills, investment, and long-term confidence across the sector. The toolkit notes that, together, the projects are expected to generate significant investment, Gross Value Added, tax revenue, jobs, apprenticeships, and work with UK-

registered suppliers across the country. The benefits extend well beyond a single project or region, supporting businesses and communities across the UK.

Based on what these projects mean for businesses like ours, our employees, and the wider industrial ecosystem, we support the granting of consent for both Jackdaw and Rosebank.

I would ask that the Secretary of State takes full account of representations from the businesses, workforces, and communities affected, and reaches a timely decision so that companies throughout the supply chain can plan with confidence.

J0376

Dear Secretary of State,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

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

10 August 2026

Dear Sir or Madam,

Representation relating to the Jackdaw and Rosebank Field Developments

Please accept this letter as a representation to the Secretary of State relating to the Jackdaw and Rosebank Field Developments, made further to the public notice of further information published under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020. [redacted]

These projects have the potential to deliver around 10% of the UK's domestic gas and oil production respectively. At a time of ongoing geopolitical uncertainty and increasing volatility in global energy markets and supply chains, maintaining domestic oil and gas production is a crucial component of the UK's energy security and resilience. Given that they will continue to be part of our energy mix for many years to come, where resources are available, we should use them.

Importing oil and gas not only undermines our energy security, but also British jobs and industry. Proceeding with the Jackdaw and Rosebank Field Developments would bring significant economic benefits to the UK. Together they would deliver £1.4 billion in tax revenues before the end of this Parliament, rising to £3.8 billion by 2034, and contribute £28.7 billion to the UK economy.[1][2]

[1] Urgent decisions on Rosebank and Jackdaw needed for national security | Offshore Energies UK (OEUK)

[2] The evolution of North Sea oil and gas receipts - Office for Budget Responsibility

Continued domestic oil and gas production can make a positive contribution to the UK's balance of payments by reducing reliance on imported energy. The UK has been a net importer of natural gas since 2004, and historical analysis by the Bank of England has shown that North Sea production made a substantial contribution to improving the UK's external trade position by reducing the oil import deficit.[3][4]

Crucially, the developments would support more than 3,500 jobs during peak construction, create 125 apprenticeship opportunities, and sustain around 880 skilled jobs throughout the production phase, helping to safeguard vital expertise across the UK's energy supply chain.[5]

A failure to support projects like Jackdaw and Rosebank will result in further offshoring of this strategically important industry, and risks deindustrialisation in pursuit of Net Zero goals. A transition to a low-carbon future that is not carefully managed will result in a loss of jobs, our skills base, and investment in our domestic supply chains.

The economic impacts would be felt most acutely in communities that depend on these industries for employment and prosperity. My constituents understand well what is at stake. Pembroke Oil Refinery supports 1,000 jobs.[6] Polling conducted this year revealed that nearly 4 in 5 of my constituents recognise and support the job contributions that the oil and gas sector delivers for their local area.[7]

If this Government is to deliver growth in every postcode, and a just energy transition, supporting both existing and future industries is vital. I therefore urge the Secretary of State to give full consideration to the representations received from workers, supply chain businesses, and communities whose livelihoods depend on these projects, as well as to the wider economic and energy security benefits they would bring across the UK. A timely and

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[3] DUKES 2026 Chapter 4

[4] North Sea oil and gas in the United Kingdom balance of payments since 1970 | Bank of England

[5] Urgent decisions on Rosebank and Jackdaw needed for national security | Offshore Energies UK (OEUK)

[6] Valero Energy Ltd - Submission to the Energy Security and Net Zero Committee Inquiry on Oil and Gas - 060126_FINAL.pdf

[7] Adura – A new chapter in the North Sea

positive decision is needed to provide certainty, unlock investment, safeguard jobs, and ensure that the substantial benefits these developments could deliver are not lost.

J0378

Dear Secretary of State,

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's

offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0379

I am writing to express my concern at the proposal for drilling licenses to be issued for the Rosebank Oilfield.

We are having a summer of extreme heat and devastating wildfires so it would be irresponsible to approve new oil and gas developments that would accelerate climate change and do nothing to lower the energy bills of UK households.

We must support and fund decarbonisation projects and take action to change the dramatic impact that climate change has had on our lives in 2026. If we don’t things will get worse.

By email to: OPRED@energysecurity.gov.uk

Reference: D/4260/2021

I object to consent being granted for the Jackdaw Field Development. My objection focuses particularly on whether the further information provided by Adura adequately addresses the requirements of **Schedule 6(5) of the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020**, especially the cumulative and long-term effects of the project's greenhouse-gas emissions.

The assessment should not consider Jackdaw in isolation or conclude that its emissions are insignificant merely because they represent a small proportion of global emissions. Schedule 6(5) requires consideration of direct, indirect, secondary and cumulative effects, their interaction, their long-term consequences, and relevant environmental protection objectives.

1. Climate change is already creating material risks in Herefordshire

The relevance of these requirements is particularly clear where I live in Herefordshire.

Herefordshire Council's climate assessment identifies that the county is already experiencing a changing climate, with increasing risks from **flooding, heatwaves, drought and extreme rainfall**. Its technical report provides projections at a 25km scale specifically for Herefordshire. (herefordshire.gov.uk)

The effects of climate change become progressively more severe with every additional increment of global warming. The **Paris Agreement's temperature goal is to hold the increase in global average temperature to well below 2°C above pre-industrial levels and pursue efforts to limit it to 1.5°C**. The significance of this is directly relevant to the assessment of Jackdaw. The environmental consequences of additional greenhouse-gas emissions cannot sensibly be assessed as though all levels of warming produce equivalent impacts. **Every additional fraction of a degree increases climate risks and reduces the margin for avoiding dangerous impacts.** An assessment therefore needs to consider the project's contribution in the context of the rapidly diminishing carbon budget and the cumulative emissions from other fossil-fuel developments.

Herefordshire's projected impacts illustrate why this matters locally. The Council's assessment projects the impact of further increases in temperature, including changes in rainfall patterns, longer and more severe summer dry periods and increasing risks from extreme rainfall and flooding. It also identifies increasing risks to human health, including the occurrence of **"Tropical Nights"**, when overnight temperatures remain above 20°C. (herefordshire.gov.uk)

These changes have direct consequences for the matters expressly listed in Schedule 6(5)(a): **populations, human health, biodiversity, water, land, cultural heritage and material assets**.

The Environment Agency has also formally recognised drought conditions in Herefordshire. 'Exceptionally serious situation' as Herefordshire in drought | Hereford Times The current heat and dry spell has also produced nearby wildfires, Ebbw Vale wildfire smoke spreads further through Herefordshire | Hereford Times In the recent Hanter Hill fire, a local family described fearing that there was a "50-50" chance they would lose their home. Hanter

Hill's family feared it was "50-50" they would lose house - BBC News

These are precisely the kinds of interacting effects which Schedule 6(5)(a)(v) requires the decision-maker to consider.

2. The River Wye SAC demonstrates why cumulative climate effects matter

The **River Wye is a Special Area of Conservation**, designated for internationally important habitats and species including Atlantic salmon, lamprey, shad, Ranunculus vegetation, white-clawed crayfish, freshwater pearl mussel and bullhead.

The condition of the Wye is already a serious concern. It is subject to significant pressures from nutrient pollution, altered flows and other environmental stresses. Climate change adds to those pressures.

Atlantic salmon are particularly vulnerable because they depend upon cold, clean and well-oxygenated rivers throughout their freshwater life cycle. Rising river temperatures and reduced summer flows increase thermal and physiological stress, while declining water quality, nutrient pollution and habitat degradation can act cumulatively to reduce the resilience of salmon populations and the river ecosystem.

Environment Agency research demonstrates the close relationship between temperature and the thermal biology of salmonids. The thermal biology of brown trout and Atlantic salmon - GOV.UK

Jackdaw would contribute additional greenhouse-gas emissions to the cumulative climate forcing which increases the pressures on biodiversity and an already vulnerable protected ecosystem.

3. Human health and material assets

Herefordshire is particularly vulnerable to climate impacts because of its dependence on agriculture and rural livelihoods, its sensitive and protected ecosystems, its flood-prone river valleys, rural water infrastructure and an older housing stock that is often poorly adapted to increasing heat.

The county is also heavily dependent upon a healthy environment for tourism, recreation, agriculture and associated businesses.

Winters bring significant flood risks along the **Wye, Lugg, Frome, Arrow and Teme**, and residents receive repeated Environment Agency flood warnings. Flooding can damage homes, businesses, roads, agricultural land and infrastructure, while also producing significant mental-health and community impacts.

Drought and heat create different but interconnected risks: pressure on water resources, agricultural losses, ecological stress, increased wildfire risk and heat-related illness.

These are not separate issues. They interact. **Hotter and drier conditions can reduce river flows and increase wildfire risk; intense rainfall can then produce flooding and increased runoff; degraded ecosystems become less resilient to further climate pressures.**

These are exactly the **interactions between population and human health, biodiversity, water, climate and material assets** contemplated by Schedule 6(5)(a)(v).

4. Long-term and cumulative effects must be properly assessed

The assessment fails to show what additional environmental effect results from **approving rather than not approving Jackdaw,** in the context of existing and approved fossil-fuel developments and the UK's climate trajectory.

The fact that the world is already approaching, or has temporarily exceeded, important temperature thresholds makes this cumulative assessment more—not less—important. **An emission occurring within a finite and rapidly diminishing carbon budget has significance even if that emission represents only a small percentage of global annual emissions.**

Greenhouse-gas emissions are cumulative and long-lived. Every individual project can be characterised as a small percentage of global emissions; that does not make the cumulative effect of approving many such projects insignificant.

The assessment should therefore demonstrate, transparently, the cumulative emissions associated with Jackdaw and other existing and approved developments.

5. Conclusion

Herefordshire provides a concrete example of why the Schedule 6(5) requirements matter.

The Paris Agreement's **1.5°C temperature goal provides an important context for assessing the significance of further emissions**. The closer the world moves to and beyond that level of warming, the greater the environmental and human consequences and the less remaining capacity there is to accommodate additional emissions without increasing climate risk.

Against that background, approving another long-lived fossil-fuel development should only occur following a robust assessment of its **direct, indirect, cumulative and long-term effects**, including the interaction between climate, water, biodiversity, human health and material assets.

As well as my own objections above, I formally endorse and adopt in full the detailed points made in the consultation response by Uplift (attached) and wish for my submissions to be considered in conjunction with theirs.

I respectfully request that **consent for the Jackdaw Field Development be refused**.

Yours sincerely,

[redacted]

J0381

I write to formally object, in the strongest possible terms, to the proposed development of the Jackdaw gas field.

Approving this project is incompatible with our national and international climate commitments. New fossil fuel extraction does nothing to secure lower energy prices for UK households, instead locking us into long-term carbon dependence while yielding minimal direct employment benefits.

I urge the government to refuse development consent and instead focus entirely on accelerating renewable energy sources.

J0382

I wholeheartedly support the development of the Jackdaw Field.

It will safeguard the UK's energy security, reduce or remove the CO2 emissions associated with the importation of hydrocarbons, create a substantial tax revenue stream and provide meaningful employment for many thousands of skilled UK residents.

Please do not waste this opportunity.

J0383

I object to the going ahead of the Jackdaw and Rosebank oil fields, for reasons including the following:

1. Shell & Equinor claim the developments will create jobs, yet their own documents state only 27 jobs directly as a result of Jackdaw, for example. Regardless, any jobs created in an industry of the past will not be safe, permanent jobs. The government needs to concentrate on jobs in industries of the future, and not allow oil companies to keep the UK stuck in the past.

2. Shell and Equinor claim the developments will lead to lower fuel bills. This is a lie. The oil & gas produced will be owned by private companies and sold on the international

market for as much money as said companies can get away with. This is how oil companies such as Shell and BP caused the fuel and cost-of-living crises of recent years, eg by profiteering from war. BP's Chief Financial Officer said "it's possible we're getting more cash than we know what to do with" while pushing millions of Brits into fuel poverty. Lower fuel bills come with renewables, eg personal solar panels and community energy schemes, and applying tax sensibly (ie on dirty fuels that we need to transition away from, not clean energy).

3. Renewable energy increases independence from geopolitical instability, which is obviously of particular importance right now. North Sea oil and gas is 90% depleted - what will we use when it runs out, if we haven't transitioned - fuel from Russia, or the US?

4. Oil companies and their corrupt supporters argue that we need time to transition. Well, it's been around 2 centuries since the first theories of man-made climate breakdown, and half a century or more since oil companies KNEW that the breakdown is actually happening and that they are mostly responsible. The "we need more time" pseudo-argument is just another attempt by oil companies to continue being allowed to perpetrate climate breakdown.

5. The UK's security services say that climate breakdown is one of the biggest threats to the UK. Climate breakdown is not an accident, it is the biggest crime ever committed, perpetrated mostly by oil companies. Shell knew about the consequences of their activities in the 1960s, if not earlier. They have spent decades trying to cover it up, pretend it's not happening, pretend it's not their fault, sabotage alternatives, etc. For example, it's been shown that Shell increases their disinformation campaigns in advance of COPs.

5. Shell and Equinor argue that the developments' contribution to global emissions is insignificant. This is an absurd argument - every single CO2-emitting project in the world could say the same thing. It's a bit like arguing that it's ok to crap in a river because one turd is insignificant, when everyone in the whole country is doing it!

So, why does the government continue to aid and abet these companies, helping them to push people into fuel poverty, helping them to murder for money all around the world, helping them to keep the UK stuck in the past?

These companies should be prosecuted for corporate mass-murder, not given licence to carry on doing exactly that, especially when governments have also known for half a century or more about the damage caused quite deliberately by oil companies.

J0384

I am writing to express my support for the extraction of oil and gas from the Jackdaw and Rosebank developments. In this uncertain world, still so reliant on oil and gas, it seems ridiculous to me that we import oil and gas from countries openly hostile to our nation and at great cost, when we have our own supply sitting, ready to be extracted and to give our country a desperately needed, secure energy supply. In addition to providing a European supply of oil and gas, the jobs created will lead to increased tax take for the government and kick start a very sluggish UK economy.

The people of the north east of Scotland kept the UK's lights on for nearly 50 years, some families lost loved ones in the process and now, they have been thrown on the scrap heap. There is no just transition for oil and gas jobs because the numbers required in the renewables sector in no way replaces those lost by the short sighted closure of what was once considered a vital part of the UK economy. We will need oil and gas for many years to come while we develop efficient and affordable renewable energy, with the emphasis on affordable. To close down the UK Oil and gas industry while shipping in oil and gas from the likes of Russia is indefensible.

I therefore urge the UK Government to allow the development of the Jackdaw and Rosebank oil fields.

J0385

There is no basis upon which these two applications should be allowed.

In the year where we are entering our 5th heat wave, 75% of the nation under drought conditions, less rain than since records began 190 years ago, food scarcity or at lease huge increase in costs is on the horizon, we must use every option in reducing our use of fossil fuel, not open new wells.

We will be criminally negligent if we allow the methane and CO2 emissions from these sites to increase the climate crisis.

J0386

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritise profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction -record-breaking temperatures, floods, and wildfires -yet governments and corporations continue to prioritise short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritise policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountable for their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritises short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0387

I am writing because I am extremely concerned at the proposal that drilling licences should be issued for Rosebank oil field. Especially as we are about the enter our 5th heatwave this summer with wide spread draught and raging wildfires, a government which would take this step would appear out of touch, irresponsible and ignorant of the impacts of climate change caused by fossil fuels. There is no basis upon which this application should be allowed.

Please show the right leadership at this important moment, and reject any new licences.

J0388

I am writing to object to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we're experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the hottest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government’s stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, MUST be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The well-established relationship between climate change, extreme heat and premature mortality.

The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

The Government's stated intention to protect the population from the health consequences of extreme weather.

Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

Where and how the current consultation was publicised;

Which newspapers and other media outlets carried the statutory notices;

What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;

Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;

And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a doctor and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0389

It probably doesn’t count for anything in this country as I don’t have the money of an oil and gas company backing me, but I object to the provision of consent for for the Jackdaw Field Development (reference number D/4260/2021).

In a year where most of the country is in drought due to climate change caused by the kind of emissions this development will product, it is ridiculous to consider drilling for more oil and gas in the UK.

People argue that drilling for oil and gas in the UK will help to reduce our dependence on the international price of oil or gas, but any gas produced by the Jackdaw field will still be sold on the world market, at the world price, and will not benefit the british people in any way.

Additionally, people will argue that this gas field will help to reduce our dependence on imports, but its production only accounts for approximately 1% of the UKs gas imports.

Given it’s minuscule impact on the price and availability of gas in the UK, and it’s significant impact on the worsening of global climate change, it is clear that this project should not be approved.

J0390

I am writing to object to the Jackdaw gas field development and to raise serious concerns about how the climate emergency is being treated.

This summer we have had heatwave after heatwave representing a significant threat to human health and wellbeing alongside escalating energy costs due to linkage with the cost of gas. It astounds me that instead of trying to detach from unstable prices and limited stocks of gas and oil were still having the discussion about whether a new gas field is appropriate despite promises from the government not to allow this.

It is clear that the climate emergency isn't a future threat but is something that needs to be taken seriously now.

As an infection doctor I've seen over the last decade the creep of tropical diseases I was taught about as abstract conditions that I may only see once in a blue moon in a returning traveller become true threats in the UK

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

The rapidly deteriorating climate conditions being experienced in the UK and internationally.

The increasingly well-established relationship between climate change, extreme heat and premature mortality.

The implications of climate change for NHS capacity, social care, public health and vulnerable populations.

The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.

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The Government's stated intention to protect the population from the health consequences of extreme weather.

Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation.

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This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

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And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe, and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jack door which does not give sufficient prominence to these human health consequence risks understating

the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0391

I am writing to urge you to reject the Jackdaw oil field development in this consultation. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.

Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.

Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

J0392

I would like to formally register my strong opposition to Jackdaw development

"Every new fossil fuel project approved today makes tomorrow's heatwaves more dangerous, and our world less secure," the UN Chief Guterres said.

Personally, the heatwaves are impacting me by worsening my health conditions, making my home feel like a hazardous greenhouse (even overnight in the heatwaves) and disrupting my child's education with dangerously hot classrooms and several school closures. In recent years there's also been widespread school closures due to severe flooding in my area too. And there have been wildfires in my county of Wiltshire and a couple of days ago, a fire engine was on our street and the smell of smoke filled the air. There are numerous regions of England and Wales suffering drought, I've received multiple messages from my water company with suggestions to save water as there's been so little rain. My child is concerned about the real risk of water shortages in their future. It's heartbreaking trying to balance quelling their fears with being honest about climate change and it's impact on water security, even in a famously rainy country!

We can all see unprecedented UK wildfires on the news, feel the summers heating up faster than we can adapt, smell the smoke if we're near the fires, hear the devastating experiences of those whose homes are flooded. Heatwaves, wildfires, drought and flooding in the UK. Farmers raising the possibility of food supply issues due to climate change induced crop failures and media discussion about the risk of water shortages.

Climate change is no longer abstract or far away.

Allowing any Jackdaw fossil fuel extraction is the wrong path. The path my child needs for a safer future is an urgent, hyperfocus on safer, cleaner, cheaper renewable energy. And a total rejection of the fossil fuel industry that got us into this mess.

Fossil fuel expansion is climate vandalism without any meaningful benefit to bills or energy security. And sends the wrong message to the world about the UK's commitment to climate change commitments both legally and morally.

At the recent London Climate Action Week, the UN chief Secretary-General António Guterres demanded an ambitious acceleration on clean energy. This would be better economically as clean energy investment now attracts almost twice as much as fossil fuels. He said the G20 group of wealthy nations “must lead” on this, as it is responsible for around 80 per cent of global emissions.

Jackdaw development is incompatible with the UK's commitments under the Paris Agreement to limit warming to 1.5°C. Chris Murray, the Labour MP for Edinburgh East and Musselburgh, said the UK must stay the course on decarbonisation. “Britain was

the first country to industrialise and we have a duty to lead the world on net zero. We must be wary of the self-interest from which oil and gas companies are arguing, while the future of the planet is at stake."

Tessa Khan, the executive director of Uplift, a campaign group, said: "It would be a mistake if the first thing Andy Burnham does as prime minister is cave into the demands of the profiteering oil and gas industry.

"These are companies that have made obscene profits, while our energy costs have skyrocketed. New North Sea drilling will not take a penny off our bills, it will just make a handful of executives and their shareholders even richer."

And again, because this cannot be said enough....

"Every new fossil fuel project approved today makes tomorrow's heatwaves more dangerous, and our world less secure."

Please do not approve Jackdaw development

J0393

As a mother deeply concerned about the escalating climate crisis, which no sensible person can deny, given the devastating wild fires and many deaths caused by extreme temperatures across Europe this summer, I am writing to urge you to reject the Jackdaw oil field development in this consultation.

My opposition is based in two fundamental concerns: 1) the urgent need to address climate collapse and 2) the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to make billions from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

Accelerate the transition to renewable energy, ensuring a just transition for workers in the oil and gas sector.
Hold fossil fuel companies accountablefor their role in the climate crisis, including ending subsidies and tax breaks for oil and gas.
Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.
The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our

children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0394

I am writing to register my support for the Jackdaw gas field development, consultation reference D/4260/2021, currently open for public consultation.

Jackdaw represents a straightforward case for timely approval. The production platform is already installed, and the project ties back into the existing Shearwater Hub, meaning the necessary infrastructure to bring gas onshore to St Fergus is already in place. This is about as efficient a route to new domestic gas supply as the UK Continental Shelf can offer.

At a time when the UK still imports a significant share of its gas, every barrel or unit of domestic production reduces our exposure to volatile international markets and strengthens national energy security. Jackdaw also supports UK supply chain jobs and investment at a moment when the North Sea sector badly needs both.

I would urge OPRED to grant consent without unnecessary delay, so that this investment and the jobs attached to it are not put at risk.

J0395

I am writing in my personal capacity as an energy and infrastructure commercial professional with extensive experience of offshore oil and gas, major-project delivery, EPC contracting and commercial management. These views are my own and do not represent those of any current or former employer.

I support the grant of consent for the Jackdaw Field Development.

The UK requires a pragmatic, orderly and investable energy transition. That must include continued responsible production from domestic resources where it can be undertaken under the UK's robust environmental regulation and transparent assessment. Jackdaw has an important potential role in supporting UK gas supply, energy resilience, skilled employment and the wider North Sea supply chain during that transition.

In my experience, large, capital-intensive energy developments require regulatory processes that are rigorous, clear and timely. Delays and uncertainty do not remove the underlying demand for energy; they can instead increase reliance on imports, weaken UK industrial capability and undermine the confidence needed to retain skills and investment in the UK offshore sector. The consequences of prolonged uncertainty are already becoming apparent in investment decisions, supply-chain confidence and workforce retention. Clear policy signals to the oil and gas industry are needed without further delay.

Jackdaw was previously granted development consent by the NSTA in 2022, following OPRED's environmental assessment. Significant funds have since been invested in anticipation of completing the remaining regulatory steps. The present consultation follows the requirement for further environmental assessment, including consideration of scope 3 emissions, before the project can proceed to production.

Government and expert forecasts recognise that the UK will continue to require significant volumes of oil and gas through to 2050. The Climate Change Committee's balanced pathway projects demand materially above expected domestic production, meaning continued imports will be required. UK-produced oil and gas can have a lower emissions intensity than imported alternatives, particularly imported LNG.

Scope 3 climate effects should be assessed properly and transparently. However, the decision should also recognise that the relevant question is not whether the UK will require gas, but how much of that continuing requirement should be met by responsibly regulated domestic production rather than imports. I consider that this strategic context, alongside compliance with the applicable environmental requirements, strongly supports consent being granted.

I support Offshore Energies UK's submission to this consultation and its call for prompt decisions that provide certainty to the UK's offshore energy sector.

I therefore respectfully ask the Secretary of State to grant consent for the Jackdaw Field Development.

J0396

I am writing in response to public consultation 4260/2021 to urge you to reject the Jackdaw oil field development. My opposition is rooted in two fundamental concerns: the urgent need to address climate collapse and the unethical profiteering from a crisis that disproportionately harms vulnerable communities and future generations.

Shell, the company behind Jackdaw, is a global leader in fossil fuel extraction. Despite knowing for decades about the catastrophic impacts of burning oil and gas, Shell and other major fossil fuel companies have continued to prioritize profits over people and the planet. While families in the UK and around the world suffer from extreme weather events, air pollution, and rising energy costs, Shell and its shareholders are set to profit from yet another oil and gas project. This is profiteering at its most cynical and morally indefensible.

The science is clear: the Intergovernmental Panel on Climate Change (IPCC) has stated that no new oil and gas fields are compatible with limiting global warming to 1.5°C. The UK's own Climate Change Committee has warned that approving new North Sea projects like Jackdaw risks undermining our net-zero targets and locking in decades of additional emissions. We are already seeing the devastating consequences of climate inaction—record-breaking temperatures, floods, and wildfires—yet governments and corporations continue to prioritize short-term profits over the long-term survival of our planet.

The Jackdaw project is a perfect example of this hypocrisy. Shell claims that Jackdaw will have a negligible impact on global emissions, but this ignores the reality that every new fossil fuel project adds to the global carbon burden. The project's environmental impact assessment suggests it would account for less than 0.02% of annual global greenhouse gas emissions, but this is a distraction. The issue is not just the scale of emissions from Jackdaw itself, but the signal it sends: that the UK is still open for business for fossil fuel companies, even as we face a climate emergency.

Beyond the climate impacts, the Jackdaw project offers little benefit to local communities. It is expected to create only 27 direct full-time jobs, a pittance compared to the potential of renewable energy and green infrastructure. Meanwhile, the UK's offshore wind sector already employs over 30,000 people, with opportunities for far greater growth. Why invest in a dying industry that fuels climate collapse when we could be building a sustainable, equitable future?

There is also a moral dimension to this issue. Fossil fuel companies like Shell have known for decades about the harm their products cause, yet they have spent millions lobbying to delay climate action and mislead the public. While communities bear the brunt of climate disasters, these companies continue to extract record profits. This is not just bad policy—it is a violation of basic ethical principles.

I urge you to reject the Jackdaw oil field and instead prioritize policies that:

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Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

- The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritizes short-term profits over the future of our children and the health of our planet is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0397

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planet.

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- Invest in green jobs and infrastructure, creating sustainable economic opportunities for local communities.

The UK has the opportunity to lead by example. Approving Jackdaw would be a step in the wrong direction—a step that prioritises profits over the future of our children,the health and wellbeing of citizens in the UK, and the health of our planet, is legally uncertain and morally wrong.

Thank you for your time and consideration. I look forward to your response.

J0398

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government’s stated commitment to protecting public health and responding to climate change.

I have also examined the additional information submitted in relation to Jackdaw following OPRED's requests for further information.

The Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor.

However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing.

Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

- The rapidly deteriorating climate conditions being experienced in the UK and internationally.

- The increasingly well-established relationship between climate change, extreme heat and premature mortality.
- The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
- The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
- The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.
- The Government's stated intention to protect the population from the health consequences of extreme weather.
- Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.
- I am also deeply concerned about the timing and visibility of the present consultation.

According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.

This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

- Where and how the current consultation was publicised;
- Which newspapers and other media outlets carried the statutory notices;

- What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
- Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
- And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

J0399

I am writing to object in the strongest possible terms to the Jackdaw gas field development and to raise serious concerns about whether the current assessment and consultation process adequately reflects the climate and public-health emergency we are now experiencing.

I am particularly concerned that decisions of this significance continue to be approached within a framework that appears to treat climate change as one environmental consideration among many, rather than as an escalating threat to the health, safety and wellbeing of the population.

This is no longer an abstract future risk.

The UK Health Security Agency has recently estimated that there were 2,877 heat-associated deaths in England during the May and June 2026 heat events alone. UKHSA has also stated that climate change is already making heatwaves more frequent, longer-lasting and more severe.

The Met Office reports that 2025 was the warmest year in the UK temperature record dating back to 1884, with the last four years all among the five warmest years recorded.

These are not merely environmental statistics. They represent preventable illness, premature deaths, pressure on the NHS and social care, disruption to communities and increasing risks to the most vulnerable members of society.

The Government itself recognises these risks. The current Adverse Weather and Health Plan explicitly identifies the need to protect individuals and communities from the

health effects of adverse weather and to build resilience within health and social-care systems.

Against that background, I find it extremely difficult to reconcile the continuing development of new fossil-fuel infrastructure with the Government's stated commitment to protecting public health and responding to climate change.

Regarding the additional information submitted in relation to Jackdaw following OPRED's requests for further information, the Scope 3 assessment acknowledges that greenhouse-gas emissions from the combustion of Jackdaw's products are likely to contribute to global temperature change. It also explicitly recognises the global climate as a highly sensitive receptor. However, the assessment ultimately characterises the effect as not significant by comparing Jackdaw's emissions with very large global and national carbon baselines.

I am concerned that this approach risks obscuring the fundamental issue.

Climate change is caused by the cumulative addition of greenhouse gases to the atmosphere. The fact that one individual fossil-fuel project represents a relatively small proportion of global emissions does not mean that its emissions are without consequence. Every additional increment of fossil-fuel-derived greenhouse gas contributes to the cumulative warming that is producing the heatwaves, flooding, ecological damage and associated health impacts we are already experiencing. Indeed, the Jackdaw assessment itself acknowledges this causal relationship.

Following the Supreme Court's Finch judgment, the Government has stated that the full environmental effects of fossil-fuel extraction, including downstream emissions from the combustion of the extracted hydrocarbons, must be recognised in environmental impact assessments.

I therefore ask OPRED to explain how the assessment of Jackdaw's downstream emissions adequately reflects:

- The rapidly deteriorating climate conditions being experienced in the UK and internationally.
The increasingly well-established relationship between climate change, extreme heat and premature mortality.
- The implications of climate change for NHS capacity, social care, public health and vulnerable populations.
- The cumulative nature of greenhouse-gas emissions and the fact that an individual project's emissions cannot meaningfully be considered in isolation from the global carbon budget.
- The UK's legally binding climate objectives and the scientific evidence underpinning the UK's carbon budgets.

- The Government's stated intention to protect the population from the health consequences of extreme weather.
- Whether approving additional fossil-fuel production risks perpetuating precisely the dependence on fossil fuels that the Government's climate policies are intended to reduce.

I am also deeply concerned about the timing and visibility of the present consultation. According to the Government's own Jackdaw records, the latest further-information consultation commenced on 8 July 2026 and closes on 10 August 2026. The Government's records also show that newspaper further-information notices were added on 16 July.This appears to provide the public with only a very limited period in which to engage with substantial new environmental information concerning a project with potentially significant implications for climate policy and public health.

I am particularly concerned that this consultation has not received the level of public attention that might reasonably be expected for a decision of this importance.

I would therefore ask OPRED to explain:

- Where and how the current consultation was publicised;
- Which newspapers and other media outlets carried the statutory notices;
- What steps were taken to ensure that members of the public, health professionals, environmental organisations, academics and affected communities were made aware of the opportunity to respond;
- Whether OPRED considers that a consultation of this significance, closing only weeks after the relevant information was published, provides a genuinely meaningful opportunity for public participation;
- And whether OPRED will consider extending the consultation period if there is evidence that members of the public have not had a reasonable opportunity to understand and respond to the new material.

I would also ask that my concerns are not treated simply as an objection to fossil fuels on ideological grounds.

I am raising a public-health concern.

As a doctor, mother and member of the public who has been following the climate crisis with increasing concern over the last decade, I have become increasingly alarmed by the apparent disconnect between the scale of the health emergency we are witnessing and the decisions still being made about fossil-fuel development.

The climate emergency is a health emergency.

The Government cannot simultaneously warn the public about the increasingly serious health consequences of extreme heat, develop plans to protect people from those consequences, acknowledge that climate change is making heatwaves more severe,

and then assess new fossil-fuel developments largely within a framework that treats their individual contribution as insignificant because it is small relative to the global total.

That approach risks losing sight of the purpose of environmental regulation: not simply to determine whether one project is large enough to alter the climate by itself, but to determine whether its environmental consequences are acceptable in the context of the cumulative emergency we are facing.

I therefore ask OPRED to give these concerns full consideration before any consent is granted and to provide a substantive response to the questions above.

I would particularly welcome clarification as to how the health consequences of climate change have been incorporated into the decision-making process, rather than simply the direct environmental effects of the offshore installation itself.

At a time when thousands of people are already dying during heat events in England, I believe the public is entitled to ask whether continuing to develop new fossil-fuel resources represents responsible government.

I would also urge OPRED to consider climate change explicitly as a public health emergency. The consequences of continued fossil fuel use are not confined atmospheric concentrations of greenhouse gases or abstract future temperature projections. They are already being felt through excess death during heatwaves, worsening cardiovascular and respiratory illness, mental health impacts, pressure on health and social care services, Disruption to food and water security, and disproportionate harm to older people children and those already live with health inequalities. In this context, I'm concerned that an assessment of Jackdoor which does not give sufficient prominence to these human health consequence risks understating the true significance of the project. Climate policy and health policy can no longer be treated as separate consider: protecting the population from climate change must be regarded as a fundamental public health responsibility.

J0400

I would like to register my objection to all aspects of the application for consent made by Adura Operations Ltd in respect of the development of the Jackdaw oil and gas field D/4260/2021 and any associated references).

Regard must be had to the scope 3 carbon emissions (ie the downstream use of the gas and oil produced) in any assessment of this application. This will immediately make clear the devastating impact the development will have on the level of the UK's carbon emissions and its ability to meet its own net zero targets and its obligations under the Paris Agreement.

Scientists will be well equipped to provide an accurate assessment of this damage. I am an ordinary member of the public with a level of education about the climate crisis we face. The warming of the planet over the last decade, including the record breaking heatwaves and devastating wildfires across Europe in the summer of 2026, provide sufficient evidence. Burning fossil fuels drives climate breakdown. It is completely irrational to contemplate developing further locations for oil and gas excavation.

Further, the development will not provide the UK with energy security or lower cost oil and gas, as prices will continue to be governed by the volatile international market. The UK will not, beyond the granting of permissions, reap the benefit of the financial gains made by the fossil fuel industry.

Finally, the jobs created are minimal and short term.

It makes no economic or environmental sense to continue to develop the oil and gas industry. The answer is to invest in clean, independent renewable energy industries. The billions of profits already made by the oil industry through the sale of fossil fuels need to be directed into the development of the infrastructure which will enable this transition.