



Summary of decision

The Secretary of State has decided to agree to the grant of consent, subject to the conditions in her decision, having considered all relevant information in the round.

This summary about the Secretary of State's decision is provided to outline that decision. It does not form part of the reasons for the decision which are set out in the decision itself, and it should not be treated as part of those reasons.

The project was given consent under the previous government in 2022. This consent was challenged and ruled unlawful on the basis that the environmental impact assessment did not assess scope 3 emissions.

In reaching her decision, the Secretary of State has reached a conclusion on likely significant effects of the project on the environment (as identified below), including the scope 3 emissions, taking into account (amongst other things) the matters required by the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020 ("the Regulations"). These effects have been weighed along with all other relevant factors in making the decision.

The Secretary of State has noted the importance of the UK meeting our legally binding commitments to reduce carbon emissions and keeping a pathway to achieve net zero by 2050 and it is considered that the emissions from this project will not prevent the UK's ability to meet its carbon budgets and achieve net zero by 2050. Gas will remain an important part of our energy mix for decades to come as we make this transition. This is because it will continue to be required for heating and industrial uses while electrification gathers pace, as well as to generate electricity until there is sufficient battery storage and other forms of flexible generation to manage the intermittency of renewables. UK demand for gas will continue and the UK will be a net importer of gas through the life of the project. Jackdaw would enter the National Transmission System (NTS) at St Fergus. It is therefore reasonable to assume that the vast majority of the gas produced by the Jackdaw project would likely be burnt in the UK.

These factors have been considered in light of the government's overall energy and environmental objectives, following the Supplementary Guidance¹ published in June 2025.

The project would support UK gas supply and therefore contribute, to a small but meaningful extent, to our energy security. Through Jackdaw's expected lifespan of up to 11 years, the UK will be a net importer of gas to meet UK demand.

¹ DESNZ (2025) Environmental Impact Assessment (EIA) – Assessing the effects of downstream scope 3 emissions on climate. Supplementary guidance for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects.

The project would not remove the UK's dependence on imports or affect prices, which are set by the volatile international market. However, Jackdaw would increase domestic gas production by around 6% at peak production (averaging around 5% of domestic gas production over its lifespan), improving the security of supply and resilience of our gas system by a small but meaningful amount. Whilst Jackdaw would contribute to security of supply this winter, it would have a more significant impact over the coming winters as it ramps up to peak production. Gas volumes from Jackdaw would also help maintain the resilience and extend the lifetime of vital gas processing and transmission infrastructure as production from the North Sea continues to decline. The Secretary of State has given significant positive weight to this factor.

The Secretary of State has considered the severity of climate change, which she is committed to addressing, as well as the extent to which emissions directly arising from the project would be accounted for in the UK regime and the lower emissions intensity of Jackdaw gas than some potential alternatives.

Applying a precautionary approach, the Secretary of State has concluded that the project's direct and indirect greenhouse gas (GHG) emissions are likely to have a significant effect on the environment for the purposes of the Regulations. For the reasons set out in her decision, she has attributed moderate adverse weight to those effects and has considered them along with all other relevant factors in deciding to agree the grant of consent. **In concluding that the Project will have likely significant effects on the environment and assessing those effects:**

- The highest estimated project emissions under the high case production scenario have been used (10% probability of meeting or exceeding that stated level of production) rather than relying on a lower, more probable production case.
- It has been assumed that all the hydrocarbons extracted would be combusted. Jackdaw gas would enter the National Transmission System. The vast majority of Jackdaw-produced gas would be combusted in the UK; however, there is less certainty about where the by-products of gas production (condensates and natural gas liquids) would be combusted.
- It has been assumed that all GHG emissions are additional effects on the environment and treated as such in the absence of definitive evidence as to any substitution effect (i.e. whether production outside the UK, and the emissions associated with it, would reduce as a result of the project), whereas in reality the net impact of Jackdaw on global emissions may be less than the gross amount the assessment is based on.
- It is assumed the project's emissions would add cumulatively to atmospheric greenhouse gas, along with existing and approved projects, in circumstances where the remaining global carbon budget is reducing and the world is not on track to meet the Paris Agreement temperature goal.

However, a significant amount of the emissions directly arising from the project (both from production and end use) will be accounted for within the UK carbon budgets and the Nationally Determined Contribution (NDC). The Secretary of State is fully committed to tackling climate change through the UK's domestic and international decarbonisation and climate obligations including domestic carbon budgets, and NDC. UK emissions in all sectors are addressed by the Secretary of State in a managed, economy-wide manner to ensure compliance with climate obligations. The project is not expected materially to affect the United Kingdom's ability to meet those economy-wide targets because continued but declining gas use is already reflected in the transition pathway and the production emissions would only contribute a small proportion of emissions within the UK's overall carbon budgets (scope 1 emissions are estimated to account for 0.0194% of CB5). Emissions attributable to any combustion of hydrocarbons outside of the UK in countries that are signatories to the relevant climate treaties would normally be included and accounted for in the national greenhouse gas inventory of the state in whose territory they are emitted.

Jackdaw would result in a greener UK gas grid during a key period of our transition away from fossil fuels. Jackdaw gas production would be less emissions intense than the average for the UK continental shelf, and less emissions intense than the mix of imported gas that would otherwise be used to heat and provide power for UK homes and businesses. Due to previous regulatory action, modifications have already been made during the construction phase which lower the emissions intensity of the project.

Overall, and balancing all relevant factors, the Secretary of State has placed moderate adverse weight on GHG emissions associated with the project.

The Secretary of State has placed moderate positive weight in her decision on employment associated with Jackdaw. According to the developer, Jackdaw would create 27 new direct jobs and safeguard 273 existing jobs that would otherwise be lost when Shearwater would have ceased to operate. The Secretary of State recognises that the number of direct jobs is small in the context of the national economy and the wider oil and gas related workforce. However, the Secretary of State considers that the ongoing employment related to Jackdaw will nevertheless be meaningful to the individuals, contractors, supply-chain businesses and communities (particularly, but not only, in Northeast Scotland) directly affected. These are exactly the communities that would be hardest hit by a disorderly transition in the North Sea.

The Secretary of State has applied moderate positive weight to other factors including that Jackdaw would extend the life of other gas system infrastructure, and the other economic benefits of the project beyond jobs. The Secretary of State has applied moderate adverse weight to the potential impact on the UK's role as a climate leader, and limited adverse weight to the environmental effects of the project

not relating to GHG emissions, where she has reached the conclusion that they are not likely to have significant effects on the environment. The decision sets out other factors which have been considered but given negligible weight.

DECISION DOCUMENT

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

REGULATION 14 DECISION

JACKDAW FIELD DEVELOPMENT

Environmental Statement (ES) Title: Jackdaw Field Development	
Developer:	Adura Operations Limited ("Adura")
Consultants:	Genesis Energies
OGA Field Group:	Central North Sea
ES Report No:	D/4260/2021
Block No/s:	Blocks 30/02a, 30/03a DEEP, and 30/02d
Project Type:	Field development
OGA Reference No:	PCON/8825/0 (Version 2)

1. Decision

1. The Secretary of State for Energy Security and Net Zero has considered whether to agree to the grant of consent by the Oil and Gas Authority (OGA)² for the Jackdaw Field Development under regulation 14 of the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020 ("the Regulations"). For the reasons set out below, **the Secretary of State agrees to the grant of consent, subject to the conditions set out in this decision.**
2. The Secretary of State under a previous Government agreed to the grant of consent on 27 May 2022³ and the Oil and Gas Authority granted consent on 1 June 2022. In January 2025, the Court of Session held that the Jackdaw consent was unlawful because downstream emissions had not been taken into account. This decision is therefore a re-determination of the decision which was reduced (quashed).

² The Oil and Gas Authority operates under the business name of the North Sea Transition Authority (NSTA).

³ This followed refusal to agree to the grant of consent in September 2021 and subsequent changes to the project by the developer to reduce GHG emissions relative to the previous proposal. Further detail is in Annex B.

3. In reaching the decision, the Secretary of State has considered all relevant material including: the Environmental Statement (ES) submitted in February 2022 (which updated that submitted in May 2021 and consolidated the information already submitted) and the decision of May 2022 to agree to the grant of consent for the project; all further information obtained or provided under regulation 12 following the submission of the 2022 ES, in 2022, 2025 and 2026; representations received during the five public-notice periods; responses from consulted authorities; potential conditions; the conclusion on likely significant effects of the project on the environment; and the wider benefits to the interests of the nation and other relevant factors set out below. The procedural history of the environmental impact assessment (EIA) for the project is set out in Annex B.
4. The Secretary of State has reached a conclusion on likely significant effects of the project on the environment (set out in this decision), taking into account the matters required by regulation 14(2) of the Regulations. The Secretary of State concludes that the project would have a significant effect on the environment as a result of the GHG emissions from the project, taking a precautionary approach as required for an EIA.
5. In line with the Supplementary Guidance on assessing the downstream scope 3 emissions of offshore oil and gas projects⁴, the Secretary of State has formed a view of the overall balance of all relevant factors in deciding whether to agree to the grant of consent.

2. Project description

6. Jackdaw is an ultra-high pressure and high-temperature gas-condensate field in the Central North Sea, within Blocks 30/02a, 30/03a Deep and 30/02d, approximately 250 km east of Aberdeen and approximately 5 km from the United Kingdom/Norway median line. The water depth in the Jackdaw area is approximately 78 m. The development comprises a wellhead platform (WHP) and four wells. The WHP was installed in October 2025 and drilling of the wells was completed in February 2026. Produced hydrocarbons would be transported through a 31 km subsea pipeline to the Shearwater installation for processing, with gas subsequently exported through the Fulmar Gas Line to St Fergus Gas Terminal and condensate through the Forties Pipeline System.

⁴ DESNZ (2025) Environmental Impact Assessment (EIA) – Assessing the effects of downstream scope 3 emissions on climate. Supplementary guidance for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects.



Figure 1. Location of the Jackdaw project

3. Key effects of the project covered in this decision

7. The Secretary of State considers the most important matters relevant to the decision to be:
 - a. Effects on users of the sea (e.g., commercial fishing & shipping) from the physical presence of temporary and permanent infrastructure;
 - b. Effects on the sediment, seabed habitats, fauna and flora from seabed disturbance caused by the placement of temporary and permanent infrastructure;
 - c. Effects on water quality, flora and fauna from discharges to sea caused by drilling, commissioning and operational produced water;
 - d. Effects on marine mammals and fish from underwater noise caused by piling of infrastructure and vessel traffic;
 - e. Effects on the water quality, protected species and habitats, fauna and flora from an accidental event resulting in an oil release;
 - f. Effects on the local air quality, ocean acidification and climate from the discharge of atmospheric emissions generated from the project, including GHG emissions;
 - g. Use of the gas in the UK and effects on security of supply;
 - h. Impact of the project on infrastructure;
 - i. Economic impact and effects on jobs and supply chain;
 - j. Alignment with the Government's objectives for the future of the North Sea and effects on the UK's role as a climate leader.
8. The EIA relating to the 2022 grant of consent assessed the matters listed in points a-f above, other than the impact on the climate of downstream (scope 3) emissions. In reaching a conclusion on these previously assessed matters, the Secretary of State has considered the previous 2022 Environmental Statement, assessment, relevant representations and any changes to the ES or previous information raised by the developer.

4. Key Environmental Sensitivities

9. The ES identified the following environmental sensitivities:
10. *Fish and shellfish*: The project area lies within multiple nursery and spawning areas of fish species. Fish such as anglerfish, blue whiting, cod, haddock, herring, lemon sole, ling, mackerel, Norway pout, plaice, sandeels, spurdog and whiting are known to be found in the project area. Site specific survey footage verified the presence of flatfish, cod and haddock. Cod, spotted ray and spurdog are also listed on the OSPAR list of threatened and/or declining species in the project location. Sandeels are known to have a particularly important ecological function as a prey item for other fish, seabirds and marine mammals. There is evidence that the presence of fines in the sediment reduces the seabed's suitability to sandeels. The 2025 further information confirmed there was no change to fish and shellfish baseline data.
11. *Seabirds*: Multiple species of seabird could be present at the project area in various levels of abundance. The highest abundance of species is attributed to the Northern fulmar, common guillemot, and Atlantic puffin. The abundance of these species is moderate (between 5-10 individuals per km²). Sensitivity of seabirds in the project area is generally low throughout the year with exceptions in May and June when sensitivity is extremely high in block 30/08, and medium sensitivity in block 30/03. In September and October, the sensitivity is regarded as high in block 23/26. The 2025 further information confirmed there is no change to seabird baseline data.
12. *Protected habitats and species*: There are no Special Areas of Conservation within 40 km of the project area. The East of Gannet and Montrose Fields Marine Protected Area (MPA) is approximately 45 km from the project area. The MPA has been designated for offshore deep-sea muds and ocean quahog aggregations. The Fulmar Marine Conservation Zone (MCZ) is approximately 32 km from the project area. The MCZ has been designated for its subtidal sand, mud and mixed sediments as well as the Ocean Quahog. During site specific surveys Ocean Quahog were observed in samples. Horse mussels were observed at some of the site survey transects in the project area, but none of the areas was observed to meet criteria of reefs. Sea pen and burrowing megafauna communities were observed during the pipeline route survey. No new environmental survey data is available since the submission of the ES, but there is no noted difference to the protected habitats and species baseline data.
13. *European Protected Species and pinnipeds*: Cetaceans such as harbour porpoise, minke whale, white beaked dolphin and Atlantic white-sided dolphin are likely to occur in the project area, predominantly during the months from May to November. Pinnipeds, such as the grey seal and the harbour seal, may occur in the project area in very low densities, but are far more common close

to shore. Since the ES, SCANS-IV (Small Cetaceans in European Atlantic water and the North Sea) survey results have been issued. These show that harbour porpoise are at higher densities than stated in the ES. However, the difference in numbers is not considered to affect the ES conclusions.

14. Other users of the sea: Commercial fishing effort in the project area has been assessed as “low” representing less than 1% of the total UK fishing effort. The majority of fishing effort in the project area is focussed on the summer months. Demersal and shellfish fishing gear is most prevalent, but pelagic gear is also used in the project area. The 2025 further information indicates that the level of fishing continues to represent less than 1% of the total UK fishing effort.
15. The project area sits within a well-established location for offshore oil and gas infrastructure. The closest platform to the proposed WHP location is the Jade installation, situated approximately 10 km to the southwest of the WHP location. The closest installation to the pipeline route is the Erskine installation, which is approximately 4 km to the northeast of the pipeline route, with the Elgin platform located 8 km west-southwest of the Shearwater host facility. Since the 2022 ES the Pierce gas export pipeline now crosses the Jackdaw to Shearwater pipeline approximately 3.9km southeast of the Shearwater installation and the Vorlich wells have been drilled approximately 12.5km southwest of the Jackdaw location.
16. The project area is not used for military exercises. There are no wrecks within 10 km of the WHP, but a wreck has been identified 4.3 km from the proposed pipeline route. Shipping density in the area ranges from very low to moderate. The 2025 further information indicates that the shipping density is the same as presented in the ES.
17. In-combination, cumulative and transboundary sensitivities: The project area is adjacent to the Norway / UK median line and closest (8 km South) to a Norwegian Particularly Valuable Area for mackerel spawning. The installation of infrastructure (siting the WHP and associated 500 metre safety zone) has reduced the availability of the natural environment to activities such as fishing, but this was offset by trenching and burying the pipeline so that fishing activities can continue in those locations. The project has the potential to add cumulatively to the produced water discharge and GHG emissions at Shearwater. The 2025 further information indicates that the total cumulative areas of temporary and permanent seabed disturbance for activities undertaken was less than initially assessed in the ES. The further information considers the potential for the project to contribute cumulatively to global GHG emissions.
18. Marine Plans: The project is within an area covered by Scotland’s National Marine Plan (NMP).

19. *Climate*: From the further information, the climate is a further sensitivity and is considered in relation to atmospheric emissions below.

5. Consideration of effects of the project

5.1 Physical Presence of temporary and permanent infrastructure

20. The ES identified that physical presence of the WHP jacket, drilling rig and support vessels during construction of the project would displace other users of the sea. The WHP was installed in October 2025 and drilling was completed in February 2026. Shipping density in the vicinity of the WHP is very low and fishing effort over the pipeline area is low. A 2025 safety zone associated with the Jackdaw WHP excludes fishing and shipping for the lifespan of the field; however, vessels are not excluded from the pipeline area. Fishing in the area is considered low and mostly undertaken with demersal fishing gear with some pelagic gear also used. There were no changes identified in the 2025 further information to the project infrastructure originally assessed in the ES. Subsea infrastructure has been buried and covered by rock in places; the burial and rock cover is designed to allow for safe fishing interaction. The project area is not subject to strong ocean currents and has low sediment mobility. It is therefore unlikely that the pipeline will be scoured and freespans able to develop. **Based on the evidence presented the Secretary of State agrees with the developer's assessment that the impacts resulting from the physical presence of WHP, drilling rigs, vessels and associated infrastructure do not present any additional impacts over those assessed in the 2022 ES and have not had and will not have a significant effect on the environment. The Secretary of State gives this factor limited adverse weight.**

5.2 Seabed Disturbance

21. The ES assessed the disturbance to the seabed from the Mobile Drilling Unit (MODU) spud cans, anchors and chains, the WHP jacket installation, and pipeline and associated infrastructure installation. The ES also stated that the MODU would be moved and deployed multiple times during the commissioning phase of the project, but the developer confirmed in the 2025 further information that this proved not to be necessary and the MODU remained on location during the installation of the WHP topsides, reducing the disturbance to the seabed. **There will be temporary impacts to the seabed, but these will not be significant in terms of environmental effects given the ability of the environment to recover. While there are some differences between what was previously identified in the ES and the further information in the areas of impact associated with the activities**

described above, the overall areas of both permanent and temporary impact are lower than assessed in the ES and therefore the Secretary of State agrees that there has been and will be no significant effect on the environment.

22. The export pipeline installed from the Jackdaw WHP to Shearwater installation is the same length (31km) and diameter (18") as stated in the ES. The ES assessed the effects of 90,000 tonnes of rock prior to pipeline installation and the further information confirmed that 82,500 tonnes of rock was actually deposited as part of the pipeline installation preparatory works. **Given the hard substrate introduced to the seabed are expected to be colonised but are not expected to result in a physical change to another habitat type, and while the 2025 further information presented by the developer identified some differences in the types and quantities of pipeline protection/stabilisation materials deposited during pipeline installation, the overall areas of both permanent and temporary impact are lower than assessed in the ES. It is concluded that the pipeline has not had and will not have a significant effect on the environment.**
23. As stated in the ES the upper well sections were drilled with Water Based Mud (WBM) with drill cuttings discharged direct to the seabed (36" section) and discharge direct to sea from the MODU (26" section). It was reported in the 2025 further information that the actual mass of WBM drill cuttings discharged from these well sections was approximately 1.2% higher than stated in the ES, but this difference is not considered significant. The lower well sections were drilled with Oil Based Mud (OBM) as stated in the ES. A change to the well design resulted in the proposed 16" sections being replaced by 17 ½" sections for all wells. While the ES assessed the impact of discharging treated cuttings to sea from all the lower well sections, only the treated cuttings from the 17 ½" section were discharged. The cuttings from the other lower well sections were skipped and shipped to shore for treatment and disposal. When considering the increase in well section diameter from 16" to 17 ½", this resulted in the mass of OBM drill cuttings discharged from the lower well sections being approximately 6% higher than stated in the ES. **Given the treated cuttings are pulverised to a fine powder before discharge from the MODU and will have dispersed over a large area, this difference is not considered significant, and it is concluded that the drilling activity has not had and will not have a significant effect on the environment.**
24. While the introduction of hard substrate into the marine environment, such as rock and concrete mattresses, will result in limited habitat change from a sand/gravel sediment, the effect will be spatially limited and is not expected to result in a change to another habitat type. The species found in the area such as Sea Pens and Burrowing Megafauna, *Arctica islandica* juveniles (commonly known as Ocean Quahog) and sandeels are considered to be

resilient to sediment disturbance and will be able to recolonise the area soon after disturbance has ceased. **Given that there has been no significant change to the areas of both permanent and temporary impacts, it is considered that the assessment of impact in the ES remain valid. It is therefore concluded that the cumulative impacts of the project on the seabed have not been and will not be significant on the environment. The Secretary of State gives this factor limited adverse weight.**

5.3 Discharges to sea

25. In the 2025 further information the developer confirms that the reservoir quality and fluid property results from the four Jackdaw wells meet the expected pre-drill case. The developer considers that these static reservoir properties provide confidence that the production profiles included in the 2022 ES remain the most likely case for Jackdaw production. Jackdaw has been designed to tolerate corrosion (using corrosion resistant alloys on the pipeline and topside pipework) rather than treatment using chemicals. **Comingling of the Jackdaw with other fluids at Shearwater is not expected to result in a significant impact on water quality at Shearwater. There is no expected change in discharges to sea during the production phase and the assessment undertaken in the 2022 ES remains valid. It is concluded that the impacts from the discharge of produced water to sea from the project will not have a significant effect on the environment.**
26. With reference to seabed disturbance (paragraph 21 above), drilling discharges to sea were in greater quantities than assessed in the ES. The 2025 further information provides details of the various drill cuttings models that were run to assess the extent of impacts associated with these discharges. Modelling was run in 2023 to inform the screening direction applications for the drilling of the four wells. This modelling accounted for the change from the 16" sections to 17 ½" sections. Modelling was re-run in 2024 to build on the 2023 modelling and account for the four contingency 17 ½" sections (one per well). Despite a substantially larger quantity of cuttings discharge modelled, the 2024 modelling showed a reduced area of impact compared with the 2023 modelling. The 2023 modelling was subsequently found to present an exaggerated area of impact due to an error in the modelling software. The actual quantity of drill cuttings discharged was approximately 38% of that modelled in 2024 and was much closer to that modelled in the ES (actual discharge 8,501 tonnes vs ES modelled 7,056 tonnes). It is therefore considered that the area of impact assessed in the ES is more representative of the actual mass of drill cuttings discharged. Discharge of drill cuttings and WBM will have resulted in a reduction in water quality in the vicinity of the discharge but due to the hydrographic conditions at the project location there will have been sufficient dilution and dispersion meaning that any reduction in water quality will have been minimal and short

term. As indicated by the ES modelling, following the cessation of drilling activities the area where the combined risk to more than 5% of the most sensitive species in the sediment is predicted to be approximately 0.328 km². This reduces rapidly to 0.058 km² during the first year following discharge due to re-colonisation by opportunistic species. **Given the hydrographic conditions and temporary nature of impacts, the impact to water quality and biological receptors from drilling discharges is not considered to be significant. The Secretary of State gives this factor limited adverse weight.**

5.4 Underwater noise

27. As described in the ES, the primary source of noise during the project is the piling activity that was undertaken during the installation of the WHP jacket. The 2025 further information describes the differences between the piling activity as assessed in the ES and noted that both the length and diameter of the WHP jacket piles were slightly larger than described in the ES. However, the pile hammer energy remained the same as assessed in the ES and piling duration was completed in a shorter period than described in the ES. A period of hammer soft start was used but this period was reduced compared to that described in the ES. The further information notes that an Acoustic Deterrent Device (ADD) for marine mammals was used prior to the commencement of piling which was not a mitigation included in the ES. However, the further information also noted that this allowed for a reduced soft-start period while achieving the aim of allowing marine mammals to move away from the source of noise before full hammer power was used. There was a difference in the length of time regarded as a break in operations due to hammer repositioning and the requirement for a hammer soft start, with the ES stating 10 minutes and the subsequent permit stating 60 minutes. The longer period was agreed as part of a Disturbance Licence (Conservation of Offshore Marine Habitats and Species Regulations 2017) which was issued for the WHP jacket piling activity.
28. Noise associated with the piling of a Sub-Sea Isolation Valve (SSIV) was not accounted for in the ES. This activity was subject to a screening direction as part of the Jackdaw to Shearwater pipeline installation. The noise levels associated with the piling of the SSIV were lower than those assessed in the ES for the piling of the WHP jacket.
29. **The differences between the ES and further information regarding noise impacts do not change the original conclusions drawn. Given the mitigations that were in place, the impacts of underwater noise have not been and will not be significant. The Secretary of State gives this factor limited adverse weight.**

5.5 Accidental events

30. The ES assessed three hydrocarbon release scenarios which were: loss of produced hydrocarbons from the export pipeline, loss of diesel from the MODU, and a well blow-out. The 2025 further information confirms that there are no changes to the scenarios assessed in the ES, and the ES assessment remains valid. Of the three scenarios assessed only a well blow-out has the potential to result in a significant impact on the sediment and benthic communities, protected areas, birds and fish. While the likelihood of a well blow-out is remote, it is considered that such an event has the potential to result in a significant effect on the environment. The developer put in place measures to avoid and/or reduce the impact of a hydrocarbon release and included:

- Multiple well barriers – a primary barrier provided by the suitable overbalanced drilling fluids and a secondary barrier consisting of the well casing and blow-out preventer;
- Well control plan – which consists of well control procedures, equipment, training and drills as well as communication;
- Relief well plans – which outlines the relevant commitments and procedures for drilling a relief well to abate any well blow-out; and
- Oil pollution emergency plan which sets out arrangements for responding to incidents that cause marine pollution by oil.

31. The ES assessment remains applicable as there are no changes to the assessed scenarios. The ES concludes that a well blow-out does have the potential to give rise to a significant effect on the environment, however, mitigation measures and commitments will be in place to reduce the risk of a well blow-out occurring to as low a risk as possible. **The Secretary of State agrees that an accidental event, in this case well blow from a Jackdaw well, has the potential to have a significant effect on the environment, however the likelihood of such an event is remote. The developer committed to put in place mitigation measures. The Secretary of State is satisfied that the mitigation measures and commitments will reduce the risk of the occurrence of an accidental event and its potential environmental effects as far as reasonably practicable. The Secretary of State gives this factor limited adverse weight.**

5.7 Marine Plan

32. In the 2022 ES, the developer assessed the project against the objectives and general policies of Scotland's National Marine Plan (NMP), which applies to Scottish inshore waters (out to 12 nautical miles) and offshore waters (12 to 200 nautical miles). The aim of the NMP is to help ensure the sustainable

development of the marine area through informing and guiding regulation, management, use and protection of the NMP areas. Appendix A of the ES considers the applicability of each of the NMP's 21 General Policies to the project and summarises the assessment against each applicable policy. The ES assessed the project to be consistent with all applicable policies. The developer also considered the Jackdaw project in relation to the Marine Strategy Framework Directive Good Environmental Status descriptors ⁵ and the NMP objectives and policies for the oil and gas sector. The information in the 2022 ES supports the assessment that the project is consistent with the NMP. **The SoS has considered the 2025 and 2026 further information in the context of the NMP assessment in the 2022 ES. The further information has not altered the previous conclusion that the project is consistent with the NMP. Having considered the ES and further information, the Secretary of State concludes that the assessment of the developer remains unchanged and that the Jackdaw project is consistent with the NMP.**

5.8 Air Quality

33. For the purpose of assessing local air quality, the Secretary of State has considered only the atmospheric emissions arising from the extraction of hydrocarbons from the Jackdaw field. Emissions from the subsequent downstream combustion of those hydrocarbons have not been included in the assessment of local air quality because the locations in which the hydrocarbons would be combusted are not known. The 2022 ES assessment of local air quality considered the effects of the emission of pollutant gasses. The developer noted that the Jackdaw WHP is located offshore and will normally be unmanned. As set out in the ES, human exposure to air pollutants at the Jackdaw WHP, the Shearwater host installation and nearby offshore installations is expected to be limited. The nearest onshore population is approximately 220 km east of the project location, and emissions are expected to disperse rapidly under prevailing offshore meteorological conditions. Impacts on air quality will therefore be localised and no transboundary impacts are expected. The developer therefore continues to assess receptor sensitivity to local air quality effects as low. **The Secretary of State agrees with this assessment and concludes that there are no significant effects in relation to air quality. The Secretary of State gives this factor limited adverse weight.**

5.9 Atmospheric emissions

34. The Secretary of State has had regard to (amongst other things) the developer's assessment of GHG emissions and their impact on the climate, as

⁵ Descriptors of Good Environmental Status as set out in the EU Marine Strategy Framework Directive (2008/56), adopted as Strategic Objectives in the NMP.

set out in (i) the 2025 and 2026 further information in respect of scope 3 emissions and (ii) chapter 7 of the ES as updated by part 2 of the 2025 further information for scope 1 emissions. As with all other matters, the Secretary of State has also considered representations by third parties with regards to GHG emissions.

35. Scope 1 and scope 3 emissions have been assessed. Scope 2 emissions relate to indirect emissions from the generation of purchased energy associated with the project. There are no scope 2 emissions from the project because Jackdaw production would be powered by Jackdaw gas.
36. For the purposes of this Decision:
 - a. Reference to scope 1 emissions specifically relates to emissions originally assessed in the 2022 ES. These emissions relate to construction and operational stages of the project and activities that are the responsibility of the developer as part of the project. Some of those activities classed as scope 1 emissions may be undertaken by other parties on behalf of the developer and therefore may strictly meet the definition of scope 3 emissions in accordance with the definitions of the Greenhouse Gas Protocol⁶.
 - b. Reference to scope 3 emissions specifically relates to emissions associated with the end use (combustion) of the hydrocarbons along with the additional assessment provided by developer in relation to "well-to-tank" emissions associated with the processing and transportation of the produced hydrocarbons prior to their final use. The assessment focusses on category 11 emissions from the end-use combustion of Jackdaw hydrocarbons, together with the additional well-to-tank processing and transport emissions.

5.9.1 Legal context: environmental protection objectives

37. The Secretary of State notes the developer's explanation that the Regulations require the assessment of likely significant effects of a project to "*take into account environmental protection objectives established in retained EU law or at national level*" (paragraph (5)(d) of Schedule 6). The Secretary of State agrees that the UN Framework Convention on Climate Change and the Paris Agreement are, as the developer states, the key environmental protection objectives relevant to GHG emissions at an international level (albeit these are not established in assimilated law), and that the Climate Change Act 2008 ("CCA2008") is the relevant such objective at national level.
38. The Secretary of State notes the stated aim of the Paris Agreement to "*strengthen the global response to the threat of climate change ... including by holding the increase in global average temperature to well below 2°C above*

⁶ [Scope 3 Calculation Guidance | GHG Protocol](#)

pre-industrialised levels and pursuing efforts to limit it to 1.5°C above pre-industrialised levels". The Secretary of State is aware that collectively, all signatory countries have agreed to work towards this goal. The Secretary of State also notes that the International Court of Justice found in its Advisory Opinion on climate change that the 1.5°C threshold referred to in Art.2(1)(a) should be interpreted as "*the Parties' agreed primary temperature goal*" and that achievement of this goal is an "obligation" "addressed to all parties as a whole".⁷ Each signatory to the Paris Agreement is required to undertake and communicate ambitious efforts, representing progression over time, with a view to achieving the purpose of the Paris Agreement. Nationally Determined Contributions (NDCs) must be prepared and communicated and explain how individual countries intend to contribute to achieving the goals of the Paris Agreement. The Agreement provides that developed country parties, such as the UK, should continue taking the lead by undertaking economy-wide absolute emissions reduction targets.

39. The amended section 1 of the CCA2008 sets a legally binding GHG emissions reduction target for the UK of 100% by 2050, compared to a 1990 baseline. This revised target was introduced in 2019 as a change from the previous 80% reduction target. Section 4 of the CCA2008 imposes a duty on the Secretary of State to set carbon budgets to cap carbon emissions in a series of five-year periods, and to ensure that the net United Kingdom carbon account for a budgetary period does not exceed the carbon budget. Carbon budgets must be set with a view to meeting the target for 2050, under section 8(2). Carbon budgets are to be set 12 years in advance of the five-year period, taking into account the advice of the Committee on Climate Change (CCC) which recommends the level of each budget. Seven carbon budgets have been adopted. The time periods covering the fourth ("4BC"), fifth ("5CB"), sixth ("6CB") and seventh ("7CB") carbon budgets are 2023-2027, 2028-2032, 2033-2037 and 2038-2042 respectively. The 6CB was the first to fully reflect the revised net zero target for 2050. The Secretary of State must prepare such proposals and policies as she considers will enable the carbon budgets to be met, under section 13.

5.9.2 Quantification of emissions

40. The Secretary of State notes that the total project GHG emissions, comprising scope 1 and scope 3 emissions, are estimated at approximately 36.6 MtCO₂e. The Secretary of State has considered the scope 1 and 3 emissions, including considering them together.

⁷ Advisory Opinion of 23 July - 2025 <https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-00-en.pdf>. See further Annex A.

Scope 3 emissions quantification

41. To estimate the emissions from end-use combustion of Jackdaw hydrocarbons (gas, natural gas liquids and condensates), the developer's assessment used the forecast hydrocarbon volumes under both P10 and P50 production scenarios, representing high and mid production estimates. The developer then multiplied those forecast production volumes by published UK Government greenhouse gas conversion factors.
42. The P10 production scenario is expected to produce the highest estimate of project-related GHG emissions, although the P50 scenario is considered more likely. A P10 scenario means there is a 10% probability that the stated production volume will be equalled or exceeded. In practice P10 represents the upper estimate of hydrocarbon volumes likely to be produced and subsequently assumed to be combusted. The developer has therefore taken the precautionary approach expected under the Supplementary Guidance by using the P10 production scenario in the assessment. In the 2025 further information on scope 3 emissions, the developer explained two methodologies to calculate the emissions. The end-use, or "combustion-only", methodology assumes that all produced natural gas, natural gas liquids and condensate are combusted, and uses fuel-specific emissions factors to estimate the resulting carbon dioxide equivalent emissions. The developer estimated lifetime scope 3 emissions of approximately 30.5 MtCO₂e under the P10 production scenario for the end use combustion of the hydrocarbons.
43. The developer also applied a lifecycle methodology, which includes both end-use combustion emissions and additional "well-to-tank" emissions associated with processing and transporting the produced hydrocarbons before their final use. Separate lifecycle emission factors were applied to the forecast production volumes. Using this more comprehensive and conservative approach, the assessment estimated maximum lifetime scope 3 emissions of approximately 35.8 MtCO₂e under the P10 production case. This high-case estimate was used for the assessment. In the 2026 further information, the developer provided additional clarification on the methodology used to estimate the "well-to-tank" GHG emissions. This demonstrated that a conservative approach had been taken, by selecting the higher emissions estimate for "well-to-tank" emissions.
44. Applying a precautionary and robust approach, scope 3 emissions from condensate and natural gas liquids have also been assessed conservatively using a petrol emissions factor. The Secretary of State is satisfied that this methodology is comprehensive and reasonable for a realistic worst-case assessment. It avoids under-counting emissions on the basis of uncertain assumptions that these products might instead be used as non-combustion feedstock, or refined into hydrocarbons with lower emissions factors than petrol. While those outcomes are possible, they cannot be assumed with certainty. Applying an all-combusted assumption, natural gas liquids and

condensate account for approximately 17% and 22% respectively of end-use emissions.

45. The developer has not provided evidence nor argued that Jackdaw gas would have a substitution effect (i.e. that production outside the UK, and the emissions associated with it, would reduce as a result of the project). It is contended in some representations that the developer's assessment that the project would not have a significant effect on the environment, assumes a substitution effect. But in line with the Supplementary Guidance, it has been assumed that all GHG emissions are additional effects on the environment.
46. The Secretary of State is satisfied that, in line with the precautionary approach, scope 3 emissions for all produced hydrocarbons including natural gas liquids and condensate have been assessed on the assumption they will all be combusted and using the highest quantity expected to be produced.

Scope 1 emissions quantification

47. Under the P10 maximum production scenario assessed in the 2022 ES, Jackdaw construction and operational emissions (scope 1) were estimated at 808,935 tonnes of CO₂e over the lifetime of the project. This comprises the maximum combined emissions from the WHP, transit to the WHP and the Shearwater incremental emissions as a result of Jackdaw, under a P10 production scenario. In the 2022 ES the Developer estimated that the Jackdaw operational incremental emissions amounted to 543 kt CO₂e with the native baseline of the Shearwater hub amounting to 2550 kt CO₂e (from first year of production at Jackdaw)⁸, and that the worst case total annual CO₂e emissions from Jackdaw were expected to be 131 kt. The assessment of project emissions needs to include the incremental emissions at Shearwater for processing of Jackdaw gas there because this is part of the production process for the project and these emissions are additional to the emissions otherwise emitted at Shearwater.
48. The Secretary of State notes that the 2022 ES also considered Jackdaw emissions cumulatively with Shearwater emissions associated with production. The 2022 ES compared the cumulative Shearwater and Jackdaw emissions (for the year of highest Jackdaw projected emissions, which was then expected to be 2026) to 2018 UK and UKCS emissions, on the basis that 2018 emissions form the basis of the North Sea Transition Deal target reduction of 50% of 2018 UKCS emissions by 2030. This comparison found that the worst case estimated annual emissions for Shearwater and Jackdaw would reflect 0.1% of the 2018 overall UK emissions and 3% of the 2018 UKCS emissions. Consideration of Shearwater emissions cumulatively is important as, without Jackdaw, Shearwater's longevity would be shortened.

⁸ First production was expected to be Q3 of 2025 at the time of the 2022 ES and has changed to mid-2026. The developer did not identify material changes to the assessment in the 2022 ES, as explained more fully below.

However, the Secretary of State considers it appropriate to use the combined emissions from the Jackdaw WHP, transit and the incremental Shearwater emissions from Jackdaw as the project emissions. The developer has also raised that Jackdaw is likely to increase the life of fields tied back to the Shearwater installation. It is considered uncertain whether this would result in any additional production from those fields. The Secretary of State notes that Scope 1 emissions from the Jackdaw project account for around 2% of the project's total estimated GHG emissions, when scope 1 and scope 3 emissions are considered together.

Conclusion on quantification of emissions

49. The Secretary of State notes that different methodologies have been used to quantify and assess the scope 1 and scope 3 emissions and is content that the methodologies used to quantify scope 1 and scope 3 emissions are appropriate.

5.9.3 Considerations specific to scope 1 emissions

50. The 2022 ES assessed the atmospheric emissions from construction, commissioning and production operations (scope 1) including emissions associated with the host installation. These greenhouse gas emissions assessed included:
 - a. The construction phase of the project, fuel combustion from the heavy-duty jack-up drilling rig, drilling support vessels, helicopters, and installation of the Jackdaw wellhead platform (WHP);
 - b. The Jackdaw WHP commissioning phase, GHG emissions associated with WHP commissioning power generation, and venting and flaring during Jackdaw well start-up; and
 - c. In relation to the production operations, emissions from energy demand, combustion of fuel, emissions from intermitted venting and emissions associated with transits to the WHP.

The further information provided updates to the scope 1 emissions assessment in the ES and additional information. The Secretary of State has had regard to these, as follows.

Updates to scope 1 emissions assessment

51. The 2022 ES considered Jackdaw emissions both incrementally and cumulatively with the Shearwater hub installation. The assessment took into account optimisation of the Shearwater gas processing facilities, changes to the amine unit, maximising the volume of CO₂ blended into the export pipeline, and phasing of the Shearwater drilling programme to reduce cumulative vented CO₂ emissions during the Jackdaw production. When reaching the decision on the 2022 ES, the Secretary of State (acting through OPRED) concluded the measures identified above would reduce the offshore emissions relative to the project as proposed in 2021 and that the resulting atmospheric

emissions, including vented emissions, would not have a significant effect on the environment.

52. In the 2025 further information, the developer confirmed there was no change to the overall assessment of the scope 1 emissions, despite some changes to the project schedule and activities. Those scope 1 emissions were estimated at 808,935 tonnes of CO₂e under a P10 maximum production scenario. Under the P50 production scenario, lifetime scope 1 emissions were estimated to reduce to 661,406 tonnes of CO₂e. The developer did note that some actual or forecast fuel use was lower than had been assessed in the ES, with WHP jacket installation fuel use just under 1,400 tonnes, compared with the ES estimate of 4,600 tonnes. Topside installation fuel use was estimated to be just under 2,000 tonnes, compared with the 2,648 tonnes originally assessed in the ES.
53. The developer noted that drilling took longer than originally envisaged but the drilling rig used less fuel per day than had been assumed in the ES. The ES assumed a worst case of 25 tonnes per day, whereas the heavy-duty jack-up rig was using between 14 and 16 tonnes per day while drilling, and 5 to 12 tonnes per day when not drilling (i.e. during maintenance or in standby mode operations). Overall drilling fuel use is not expected to exceed the quantity addressed in the ES. The developer also noted that there could be limited flaring during perforation operations noting it may be required as a safety mitigation measure. The developer initially provided a summary of GHG emissions from perforation flaring and noted these emissions account for approximately 4% of the estimated emissions for the drilling phase but later confirmed in the June 2026 further information that well perforation activities were not required.
54. In the further information provided in June 2026, the developer clarified the total fuel consumption associated with drilling support activities, including emergency response and rescue vessels, supply vessels and helicopters. Total fuel consumption was estimated at 21,371 tonnes, around 3% higher than the 20,740 tonnes originally assessed in the 2022 ES. However, the developer confirmed that fuel use for drilling and installation was still expected to be approximately 11% lower than the total estimated in the 2022 ES.
55. For commissioning, start-up and production operations at the Jackdaw WHP, the further information confirmed that the activities assessed in the ES remain representative of the planned activities. The scope 1 emissions quantified in the ES have therefore been considered, estimated at 808,935 tonnes of CO₂e under the P10 maximum production scenario. For production operations at the Shearwater host installation, the further information confirmed that the reservoir quality and fluid properties from the four Jackdaw wells are consistent with the pre-drill expected case assessed in the ES. The further information also confirmed that the estimates of emissions assessed in the ES, including CO₂ emissions from the amine vent, remain valid. The developer

further noted that Shearwater native emissions are below what was originally assessed in the ES.

56. The Secretary of State notes the updates to the scope 1 emission assessments provided and has taken these into account, along with the scope 3 emissions.

Emissions intensity

Jackdaw emissions intensity

57. The Secretary of State notes the developer's estimate of the upstream operational emissions intensity of the Jackdaw Project being lower than that for Liquefied Natural Gas (LNG) or the UKCS average for gas. GHG intensity is the emission quantity of CO₂e relative to the amount of hydrocarbon production. For the purposes of assessing the significance of the effects on the environment, and on a precautionary basis, the Secretary of State assesses the project's emissions as additional. The potential difference in emissions intensity has therefore not been taken into account in determining significance. This has however been taken into account as a relevant factor in considering and weighing the impact of GHGs for the purpose of the overall decision as to whether to agree to the grant of consent. The Secretary of State considers that Jackdaw production would not affect future UK gas demand and, in the absence of Jackdaw, demand would be met through other supplies. This is on the basis that domestic supply will not meet demand over the project's lifespan⁹ and the shortfall will be made up of imports from a combination of sources, that gas prices in the UK are driven primarily by global factors not UK production – as set out more fully below (paragraph 194), and that UK gas demand is inelastic with any price changes unlikely to impact customer demand¹⁰.
58. The developer estimates that the upstream operational emissions intensity of the Jackdaw Project is 8.5 kgCO₂e/boe¹¹ (based on the Scope 1 emissions assessed as part of its likely significant effects assessment). After accounting for the UK average transport and processing intensity (representing a sector-wide average, not based on a project-specific assessment of the Jackdaw export system), the developer estimated an overall Jackdaw intensity after production of 18.5 kgCO₂e/boe.
59. The Secretary of State notes the developer's explanation of and data for how emissions intensity of imported gas varies by source: based on data from 2024, imported LNG has an average intensity of 85 kgCO₂e/boe; pipeline gas (99% from Norway) has an intensity of 8 kgCO₂e/boe and overall emissions

⁹ Based on projected domestic production (NSTA February 2026) and projected levels of gas demand that are consistent with the latest DESNZ Carbon Budget and Growth Delivery Plan (CBGDP).

¹⁰ <https://obr.uk/box/how-gas-demand-and-supply-have-responded-to-higher-gas-prices/>

¹¹ boe is barrel of oil equivalent

intensity for gas imported via interconnectors is unknown. The UKCS average for gas was 28 kgCO₂e/boe in 2024¹². Representations in support of the project also raised this point, stating that Jackdaw gas has comparatively lower GHG emissions than imported LNG sources and that the Secretary of State should consider the application of the UK's high environmental and regulatory standards compared to lower standards in other gas producing countries. One representation referenced a study undertaken which showed that that natural gas sourced from the UK and Norwegian North Sea is among the lowest carbon sources of gas available to the UK¹³ whilst another appears to have referenced the same NSTA source utilised by the developer¹⁴. Other representations making this argument did not provide evidence to support the claim.

60. The developer state that if Jackdaw were not consented, the expected gas supply from Jackdaw would be replaced by imported LNG to meet UK gas demand as Norwegian pipeline gas is at capacity. This appears to be based on past import data.¹⁵ Representations in support of Jackdaw also raised this, stating that the project would reduce reliance on imported gas.
61. The developer states that replacing the expected production of gas from Jackdaw with US LNG could result in approximately 4 MtCO₂e of additional emissions (around 20% more lifecycle CO₂e emissions than producing the same gas domestically). In this assessment, the developer has used the P10 production profile and has assumed that Jackdaw gas has displaced LNG only. Carrying out the same assessment but using the P50 profile, the emissions associated with US LNG are 2.6 MtCO₂e higher than Jackdaw. In its 2026 further information the developer presented UK LNG import GHG intensity data for imports (from various countries) as well as providing a more detailed comparison with US LNG. The Secretary of State notes that the majority of LNG imported into the UK in 2025 was from the US¹⁶.
62. The SoS has considered the developer's assertion that Jackdaw would displace LNG (rather than alternative sources) and finds that:
 - a. Norwegian supply sources are only expected to be at capacity during high demand periods in the winter season. For other periods, e.g. summer, without Jackdaw gas there would be increased flows via Norwegian pipelines in addition to increased supply from other sources.

¹² <https://www.nstauthority.co.uk/media/nupk5sx1/emissions-intensity-of-producing-natural-gas-factsheet-sept-2025.pdf>

¹³ [Representations Following Further Information Received August 2026 Redacted](#)

¹⁴ NSTA - [2024 Emissions intensity of producing natural gas](#)

¹⁵ Pages 56 and 148 of the 2026 further information, citing the above NSTA factsheet.

¹⁶ Department for Energy Security and Net Zero (2026) Digest of UK Energy Statistics Annual data for UK, 2025. Chapter: Natural Gas. [Digest of UK Energy Statistics \(DUKES\) 2026 - GOV.UK](#)

- b. Therefore, a decrease in UKCS supply from the Jackdaw project not being granted consent would likely cause an increase in both Norwegian Continental Shelf and LNG imports, along with a net increase in interconnector imports.

63. In conclusion, the Secretary of State considers it is not certain that Jackdaw gas would displace only LNG. However, given the significant difference in emissions intensity between Jackdaw gas and LNG (paragraph 59 above), and the potential mix of gas it could replace (acknowledging that some pipeline supplies from Norway, with a lower emissions intensity than Jackdaw, could be displaced), the SoS is satisfied that it is likely that insufficient Norway pipeline gas is expected to be displaced to offset the significant difference in emissions intensity between Jackdaw gas and LNG and therefore that the mix of gas that Jackdaw gas displaces would be more emissions intensive than Jackdaw gas. The Secretary of State recognises that this would not impact end use combustion emissions, which will be broadly similar irrespective of the source of the gas, and make up the majority of lifecycle emissions.
64. The Climate Change Committee has previously found that it is not possible to establish the net emissions impact of UK gas production on global emissions because it cannot be determined whether a reduction in UK demand for imported gas (due to additional domestic production) will lead to less gas being produced globally, or to that gas being used in other markets.¹⁷
65. The Secretary of State agrees with the Climate Change Committee's finding and therefore cannot confidently establish the net impact of Jackdaw on global emissions (but has taken a precautionary approach of assuming all emissions are additional for the significance assessment, as set out above). The Secretary of State notes the context of the International Energy Agency estimating that the planned increases in LNG export capacity worldwide could be larger than projected global demand for LNG by 2030.

Methane intensity

66. The Secretary of State notes the developer has also addressed the methane intensity of the project. Methane is addressed within the broader considerations for Jackdaw emissions intensity above (as it is covered within CO₂e), but for completeness the Secretary of State has considered the points raised by the developer and in representations.
67. The developer's forecast combined Shearwater and Jackdaw methane intensity is 0.44 kgCO₂e/boe, which the developer notes is below the UK stated average of 1.5k gCO₂e/boe and below the stated global average of 15kg CO₂e/boe. Methane emissions from the UK's oil and gas sector are a relatively new area of focus, with the North Sea Transition Deal (published

¹⁷ Climate Chang Committee (2022). Climate compatibility of new oil and gas fields.
<https://www.theccc.org.uk/publication/letter-climate-compatibility-of-new-oil-and-gas-fields/>

March 2021) committing the sector to methane reduction targets and zero routine flaring and venting by 2030. As a result, the industry is still developing its capability in methane measurement, monitoring, reporting and abatement. The developer is currently at an early stage in this process, and its methane management approach at Shearwater can reasonably be expected to mature over time, due to wider UK industry and regulatory commitments and as a recent member of OGMP2. While the methodology and underlying data for the above forecast have not been provided, the Secretary of State considers an estimate to be sufficient in these circumstances.

68. The developer states in the further information that the UK methane intensity figure referred to in the paragraph above is much lower than the global average methane intensity, owing to the commitments made by the UK oil and gas industry to halving methane emissions by 2030 (using 2018 as a baseline) captured in the Methane Action Plan of Offshore Energies UK (OEUK)¹⁸.

Shearwater emissions intensity

69. The 2022 ES also addressed the emissions intensity of Shearwater. The Secretary of State notes the conclusion reached in the 2022 decision that the changes made to the project in 2021 to reduce emissions, resulted in the project benefitting from spare ullage capacity at the Shearwater export compressors, which would reduce both the additional energy requirements for the Jackdaw project and some of the power emissions resulting from Jackdaw production. The 2022 ES shows that GHG intensity and energy intensity at Shearwater are lower when Jackdaw emissions are included¹⁹. The combined Shearwater and Jackdaw emissions intensity was stated at 31 kgCO₂e/boe in the 2022 ES. The 2026 further information request asked the developer to explain why the Jackdaw emissions intensity figure did not include transport and processing emissions intensity and whether this would be above the UK average, given that the figure for Shearwater and Jackdaw was above the UK average.
70. In the 2026 further information the developer provided updated annual carbon intensities of the Shearwater host including production from Jackdaw, for 2026-31. The developer clarified that the Shearwater intensity figure uses the P50 production case (the most probable outcome of production, which is generally used to estimate GHG emission intensity) and included a factor for average UK transport and processing emissions (paragraph 58 above). The Secretary of State notes that P50 production case typically has a higher GHG intensity than the higher production volume P10 scenario. The projections provided in Table 9 of the further information of June 2026 show a range of GHG intensity of 13.8 kgCO₂e/boe in 2027 rising to 28.2 kgCO₂e/boe in 2031

¹⁸ [Emissions Monitoring Report 2025](#)

¹⁹ Table 7-8 of 2022 ES, 0.19 – 0.54 tonnes of CO₂e per tonne of hydrocarbon when including Jackdaw and 0.23 – 1.23 tonnes of CO₂e per tonne of hydrocarbon for the Shearwater baseline.

as Jackdaw production tails off under the P50 scenario. The average carbon intensity from 2026 – 2031 is 16.6 kgCO_{2e}/boe. The Secretary of State notes that a representation contends that the Shearwater emissions intensity information provided by the developer does not cover the Jackdaw project's full, P10, production period, which is stated elsewhere to run to 2037, and omits the period of the highest emissions intensity. The expected Jackdaw GHG intensity is lower than Shearwater installation GHG intensity, which is currently operating below UKCS average. The Secretary of State is satisfied that the emissions intensity of the hub is under the UKCS average on the P50 case for most of the period.

5.9.4 Environmental baseline and assessment of effects on Schedule (6)(4)(f) and 6(5) factors

Current environmental baseline

71. The Regulations require an ES to describe, as a baseline scenario, the relevant aspects of the current state of the environment, and an outline of its likely evolution without the project. Under the Supplementary Guidance, for scope 3 emissions, a global baseline scenario of GHGs is to be considered, with a reasonable future estimate of GHGs. The Regulations require an assessment of the likely significant effects of the project on the environment, including effects resulting from the impact of the project on climate and likely significant effects on various receptors as relevant (paragraph (4)(f) and (5) of Schedule 6).
72. The developer initially provided information about global temperature rise as a baseline. This was considered insufficient and further information was requested on behalf of the Secretary of State, to describe the current state of the environment and climate in relation to other indicators, based on up-to-date environmental information and scientific knowledge.
73. The developer summarised the current environmental baseline by reference to the factors set out in paragraphs 6(4) and 6(5) of the Schedule to the Regulations. The further information provided current global observations and drew on relevant literature, including peer-reviewed scientific evidence. The Secretary of State has had regard to the developer's overview of this information as set out in Table 1 of the developer's 2026 further information. The further information addresses a range of environmental indicators, including atmospheric greenhouse gas concentrations, surface temperature, extreme weather and climate events, sea-level rise, changes to the cryosphere and oceans, biodiversity, population and human health, material assets, cultural heritage and landscape.
74. The Secretary of State notes that, in summary, the sources the developer considered indicate that global surface temperature during 2011–2020 was approximately 1.1°C above the 1850–1900 pre-industrial baseline. It is also

indicated that extreme weather events, including temperature extremes, heavy precipitation and drought, are becoming more frequent and intense; sea levels have risen by around 0.6 m since the early 1900s; and there has been significant cryosphere loss (ice loss), ocean warming and biodiversity loss. The sources also identify increasing risks to human health, material assets, cultural heritage and landscapes.

75. The further information also provided an overview of atmospheric methane. It noted that methane concentrations have accelerated since 2006, and that methane has a greater warming potential per unit mass than CO₂, although methane remains in the atmosphere for a shorter period. Representations have been received about the management of methane emissions. The developer's information and representations are considered below (paragraph 98).
76. The Secretary of State recognises the developer's overview draws on peer-reviewed scientific literature, including assessments by the Intergovernmental Panel on Climate Change (IPCC), which is internationally recognised as reflecting the best available science on climate change and UNEP (Emissions Gap Report 2025). The Secretary of State has also had regard to more recent literature, including the Global Carbon Budget paper by Friedlingstein *et al.* (2026), the Indicators of Global Climate Change by Forster *et al.* (2026), and the UNEP Emissions Gap Report²⁰ and UNEP Limiting Overshoot Report²¹. These additional sources seek to address the current state of the climate by examining carbon budgets and key indicators of climate change.

Future environmental baseline

Developer's information

77. To give a future baseline, the developer initially referred to IPCC and International Energy Agency (IEA) pathways²², and UK carbon budgets and NDCs, stating these are aligned with the Paris Agreement temperature goal. They identified the IEA Net Zero Emissions by 2050 (NZE) and Announced Pledges Scenario (APS) as providing a future global baseline and a reasonable future estimate on the basis that these were at the bounds of a range of IPCC C1 and C2 scenarios, which lead to a 50%+ chance of limiting the temperature rise to 1.5°C in 2100. The developer also used the UK carbon budget as a baseline for a national context. This approach of treating certain

²⁰ UNEP (2025) Emissions Gap Report 2025: Off target – Continued collective inaction puts global temperature at risk. <https://doi.org/10.59117/20.500.11822/48854>

²¹ UNEP (2026) Limiting Overshoot: Navigating exceedance of 1.5°C and pathways towards return. Nairobi. <https://doi.org/10.59117/20.500.11822/49857>.

²² The APS (included in the World Energy Outlook 2024) assumes that governments fulfil all announced climate commitments and net zero pledges in full and on time, whereas the NZE represents a pathway consistent with achieving net zero CO₂ emissions by 2050 and limiting warming to 1.5°C.

1.5°C aligned pathways as a reasonable future estimate of emissions was considered insufficient because the selected scenarios are not predictors of future emissions and so their assumptions, limitations and uncertainties needed to be considered and the rationale for using them as the baseline explained before they were used in this way.

78. A further information notice was issued on behalf of the Secretary of State, requiring information about assumptions, limitations and uncertainties of scenarios used and raising that the APS scenario projects a global average temperature rise of 1.7°C above pre-industrial levels by 2100 and so is not aligned with the 1.5°C temperature goal.
79. The developer provided further information for a future baseline based on the IPCC's Shared Socioeconomic Pathways (SSPs). The information considers the effects of three ranges of future scenarios on specified receptors, based on the IPCC's SSPs from the Sixth Assessment Report (AR6) – Lower-Warming futures (rapid emissions reductions; ~1.5–2°C) which aligns with SSP1-1.9 and SSP1-2.6 and RCP2.6, Intermediate-Warming Futures (Intermediate Emissions and Warming Pathway; ~2–3°C) which aligns with SSP2-4.5 and RCP4.5 and Higher-Warming Futures (continued high emissions; >3°C which Aligns with: SSP3-7.0 and SSP5-8.5 and RCP8.5 (the Secretary of State notes that the SSP5-8.5 and RCP8.5 scenarios have been retired on the basis they are now implausible). The SSPs are not predictions or forecasts; rather, they are scenarios based on different assumptions and are used to illustrate a range of potential future greenhouse gas emissions trajectories and associated global climate outcomes.
80. The developer noted that, under SSP1-1.9 and SSP1-2.6, rapid reductions in CO₂ emissions are achieved, with global net zero emissions reached around mid-century. Under these pathways, atmospheric CO₂ concentrations peak before stabilising and gradually declining. These pathways are considered broadly consistent with limiting long-term global warming to between 1.5°C and 2°C. In contrast, SSP2-4.5 assumes a slower rate of decarbonisation, with continued accumulation of atmospheric CO₂ and correspondingly higher levels of long-term warming. The higher-emissions scenarios, SSP3-7.0 and SSP5-8.5, project continued increases in CO₂ emissions throughout the century, leading to rapidly rising atmospheric concentrations and substantially greater levels of warming.
81. The developer also referred to the IEA scenarios outlined in the World Energy Outlook (WEO) (2024 and 2025), which comprise the States Policies Scenario (STEPS) and Current Policies Scenario (CPS) (WEO 2025 only), as well as the APS (WEO 2024 only) and NZE scenarios, mapping these nominally to the IPCC SSPs. The Secretary of State notes the summary of the STEPS as a policy-driven scenario including both enacted and announced measures, with GHG emissions peaking and reducing modestly, fossil fuel use stabilising and

global warming reaching around 2.5°C. The Secretary of State recognises that this scenario gives context as to how current (including announced) policies worldwide may affect warming.

82. The developer also referred to UNEP scenarios, to identify which of the SSPs could be used as a reasonable estimate of global GHG emissions over the lifetime of the Jackdaw project. The developer referenced in the further information that UNEP's Emissions Gap Report 2025 concludes that global temperatures are likely to surpass 1.5°C above pre-industrial levels within the next decade. This report states that achieving a 1.5°C pathway would require greenhouse gas emissions to reduce by around 55% by 2035, compared with 2019 levels. Limiting global warming to 2°C would require a reduction of approximately 35%. The developer stated that UNEP analysis indicates that, while it remains possible for global emissions to reduce in a way that would align with a 1.5°C climate warming trajectory by 2100, current data indicates that this is becoming increasingly unlikely.
83. The developer concluded that a reasonable estimate of future global GHG emissions over the lifetime of the Jackdaw project is bounded by SSP1-1.9 and SSP2-4.5. The developer considered that an upper end of that range reflects a trajectory broadly consistent with current, or moderately strengthened, global policy action, rather than the achievement of the Paris Agreement-consistent temperature goal. The developer also considered this upper end to be indicative of future scenarios in which governments take no further action beyond measures already enacted.

Representations on future baseline

84. Representations contended (amongst other things) that the developer has considered inappropriate pathways that are not Paris Agreement-aligned, including SSP2-4.5 which could lead to a warming of 2.7°C by the year 2100, other pathways that used a 2°C carbon budget, and the APS scenario because it is not aligned with the temperature goal of 1.5°C but projects a global temperature of 1.7°C instead. Representations also contended that the scenarios in the further information neither consider global GHGs in the baseline as the Guidance requires, nor consider the world without the project and offer no means to compare how the environment changes with the addition of the project.

Secretary of State's consideration of future baseline

85. The Secretary of State notes that each pathway and scenario has limitations and depends on a range of assumptions, including assumptions about policy, technology, demand, economic development and societal change. The Secretary of State has taken those limitations into account when considering the pathways and scenarios to contextualise the project's GHG emissions in the assessment.

86. The Secretary of State notes all of the information provided. The Secretary of State also notes that the latest UNEP Limiting Overshoot reports that it is now likely that the world will exceed 1.5°C around 2030 and limiting warming to 1.5°C remains the global goal. This position is consistent with the IPPC AR6 which states *‘The IPCC states with high confidence that maintaining global CO₂ emissions at 2019 levels throughout 2020–2030 would almost exhaust the remaining carbon budget for limiting warming to 1.5°C and significantly reduce the remaining budget for 2°C. It further concludes that emissions from existing fossil fuel infrastructure alone are sufficient to exceed the remaining 1.5°C carbon budget, while emissions from existing and planned infrastructure, without additional abatement, are approximately equal to the remaining carbon budget consistent with limiting warming to 2°C.’*
87. In addition, the Secretary of State notes that based on new NDCs from 113 Parties under the Paris Agreement up to 9 November 2025, total global greenhouse gas emissions in 2035 are projected to be around 12% lower than 2019 levels. As of the 7 September there are 150+ NDC submissions, but a projected emissions reduction value will be available following the next NDC Synthesis Report by the United Nations Framework Convention on Climate Change (UNFCCC).
88. The Secretary of State notes the representations contending it is inappropriate to consider pathways that are not 1.5°C-aligned. She considers that the range of pathways used provides appropriate context as to potential future emissions scenarios given the uncertainties as to future emissions and recognises that this may have been useful for the public participation aspect of the EIA process. The Secretary of State notes that by using pathway SSP2-4.5 as part of their assessment the developer has contextualised the emissions as a lower share of total global emissions - the share is greater when compared, as the developer has also done, to pathway SSP1-1.9 (which is aligned to the 1.5°C temperature goal). The Secretary of State considers that the pathways showing higher warming demonstrate the importance of the global temperature goal, rather than meaning that higher levels of GHG could be tolerated. The Secretary of State considers the assessment of significance should therefore be considered against pathways aligned with the global 1.5°C temperature goal in order to consider the project within a trajectory to that temperature goal, which is recognised to be possible although the world is not currently on track, and provide a conservative approach as the developer has indicated.
89. As to representations that GHGs are not considered in the baseline information, the Secretary of State notes that the information addresses warming from global GHG emissions and its effects rather than focusing on the emissions themselves. However, the pathways and scenarios set limits for emissions that the developer references (set out in the further information with Jackdaw emissions compared to them - table 7 at p47 of the 2026 further information). The Secretary of State considers the developer has used a

number of future climate scenarios (a future baseline) which assess the different projections of climate scenarios without the Jackdaw project, although the Secretary of State notes that no reference is made to assessing how the environment would change with the addition of the project. The developer's view is that the project's effect could be to contribute to any of the scenarios and the effects described.

5.9.5 Assessing significant effects on receptors

90. Respondents to the public notice contended that the developer's initial further information failed to assess likely significant effects that are attributable to the project. OPRED (on behalf of the Secretary of State) also considered that the 2025 further information did not address the project's indirect effects – i.e. the effects of the projects impact on climate – and this information was therefore requested in the 27 March 2026 notice for further information.
91. The developer confirmed that the baseline information was also provided to assess the impact on the receptors included within the Regulations (Schedules 6(3) & 6(5)), as well as serving as an evolving baseline over the project's life.
92. Respondents have contended that the developer does not treat these warming scenarios as a baseline for the purposes of assessment. Representations raise (amongst other things) that the developer describes scenarios depicting how the climate might evolve in the future, without assessing effects attributable to the project against the baseline scenario. Representations note the linear relationship between greenhouse gas emissions and increased global average temperatures, and that information on temperature rise can be used in combination with the numerous attribution studies that have been published to estimate the effects – such as reduction in sea ice, reduction in snow cover, increased rainfall, likelihood of droughts, fires and floods, and human mortality – from given volumes of greenhouse gas emissions. This point is discussed in the section below on the Secretary of State's consideration of assessment of effects on receptors.
93. Representations note that Schedule 6(5)(a)(v) of the Regulations requires the ES to cover the likely significant effects on the interaction between the factors referred to in paragraphs (i)-(iv) of Schedule 6(5)(a). Representations raise the health consequences of extreme heat, as well as pressure on health and social care services and disruption to food and water security, and ask for clarification on how the health consequences of climate change have been incorporated into the decision-making process. Representations also consider that:
 - a. a rigorous and comprehensive EIA is required before authorising potentially dangerous activities that may seriously affect individuals' life, health, wellbeing and quality of life; and

- b. an assessment is required of the activity's compatibility with the State's national and international obligations to take effective measures against adverse climate impacts. Representations contend that this requires a project-level evaluation of the project's emissions and their significance and assessment of cumulative GHG emissions, not a project-by-project approach.

Secretary of State's consideration of assessment of effects on receptors

94. The Secretary of State notes that the developer's further information demonstrates the expected effects on various receptors depending on what level of warming ensues. The Secretary of State agrees that the developer has not expressly assessed specific project effects against the scenarios. The Secretary of State notes however that the developer views any of the warming scenarios as plausible so that the project's effect could be to contribute to any of the scenarios and the effects described. The Secretary of State notes the developer's view that external factors such as internationally agreed action are needed to alter the climate position.
95. The Secretary of State considers that the further information provided about climate effects of different warming scenarios enables her to consider the likely effects of the project's scope 3 emissions cumulatively by reference to the current state of the climate and global emissions reduction pathways. The information provided makes clear that the effect of increased GHG emissions is their contribution to climate change, with impacts on global surface temperature, extreme weather and climate events, sea level rise, cryosphere changes, oceanic changes including acidification, biodiversity, population and human health, material assets, cultural heritage and the landscape. In terms of ocean acidification this occurs via direct exchange through the air of CO₂, NO_x and SO_x. In the 2022 decision, reflecting the 2022 ES, it was considered that the impact on ocean acidification was minor and considered to be as low as reasonably possible due to low amounts of NO_x, SO₂ and CO₂, meteorological conditions causing rapid dispersion, and management and mitigation measures. That assessment was based on scope 1 emissions. The Secretary of State has also considered the 2026 further information on ocean acidification provided in relation to the baseline and future pathways. The Secretary of State has considered ocean acidification as part of reaching a conclusion on significance and whether to agree to the grant to consent.
96. Whilst the further information does not explicitly identify the impacts on receptors attributable specifically to the Jackdaw estimated emissions, the serious effects of increased GHG emissions under a 1.5°C warming scenario or higher warming scenarios are clear. The Secretary of State has had regard to the points raised in representations, including the serious concerns raised about the impacts of climate change on human health, mortality and pressures

on the NHS, as well as extreme weather, displacement of people and food insecurity.

97. Respondents highlighted the need for consideration of health consequences of climate change through the decision-making process. As part of the further information the developer described the current baseline and the impact on rising health risks, climate-sensitive diseases, heat-related impacts and food and nutrition insecurity. The impacts on these aspects were then assessed against a range of future global warming pathways. The Secretary of State has considered the information on impacts on human health provided within the further information, along with information about impacts on health and other receptors in reports during the decision-making process. The Secretary of State acknowledges these effects and the seriousness of climate change and its impacts, which are relevant to contextualising the project emissions (scopes 1 and 3). She has taken these into account in reaching a conclusion on significance and deciding whether to agree to the grant of consent. The Secretary of State is mindful of the obligations to carry out a rigorous process and assess the compatibility of an activity with national and international obligations; she considers the process to be rigorous and has assessed the compatibility of the project against these obligations. Cumulation of effects is also considered below.

5.9.6 Managing methane emissions

98. The developer raises, as do respondents to the 2026 public notice, that methane has a higher global warming potential than CO₂ (representations raise that it traps 80 times more heat over 20 years). Representations also contend that significant volumes of methane are wasted through venting, flaring and methane leaks (research cited states that the gas lost could heat 570,000 homes) and that flaring and venting should be ended before new extraction is permitted. Other representations contend that a condition should be imposed on the developer if consent is granted, in relation to methane management and minimising flaring and venting; and that methane emissions are underreported and underestimates of methane loss could exacerbate climate impacts of the project. The Secretary of State has considered the points raised by the developer and the representations in relation to methane emissions.
99. The developer has stated it is a signatory to the Oil and Gas Methane Partnership (OGMP2), a United Nations Environment Programme (UNEP)²³ led international measurement-based framework to tackle methane emissions. In the UK, flaring and venting accounted for 69% of upstream oil and gas methane emissions in 2023.

²³ www.ogmpartnership.org

100. The Secretary of State notes the developers forecast combined Shearwater and Jackdaw methane intensity is below the UK stated average and below the stated global average of 15kg CO₂e/boe. The developer states in the further information that UK methane intensity figure is much lower than the global average methane intensity, owing to the commitments made by the UK oil and gas industry to halving methane emissions intensity figures by 2030 (using 2018 as a baseline) captured in OEUKs Methane Action Plan²⁴. The UK has signed up to the Global Methane Pledge²⁵, which aims to decrease methane emissions by at least 30% from 2020 levels by 2030. The UK oil and gas industry has also signed up to the Oil and Gas Climate Initiative (OGCI) to aim for a methane intensity target of below 0.2% by 2025. The sector met that target in 2020, and the projected methane intensity for upstream oil and gas is currently 0.12-0.13%²⁶. The UK government has committed to its own UK Methane Action Plan (October 2025), which includes the upstream methane emissions from the oil and gas sector. The plan refers to the NSTA commitments to ending routine flaring and venting by 2030, and the production of emissions reduction action plans, which form part of the NSTA stewardship programmes. The UK Methane Action plan for oil and gas, connects into the commitments made in the North Sea Transition Deal and OEUK's Methane Action Plan to reduce methane emissions.
101. The oil and gas sector has committed to ending routine flaring and venting by 2030 as per the World Bank's Zero Routine Flaring by 2030 initiative. The implementation of zero routine flaring and venting is reflected in the NSTA's regulatory expectations and stewardship programmes, with a reduction in flaring of 51% between 2018 and 2024. The Secretary of State is satisfied that existing measures overseen by the NSTA adequately address flaring and venting. Wider policy or legislative changes are not within the remit of this project decision. The Secretary of State notes the representation contending that methane emissions are underreported, and considers there is uncertainty as to the levels and appropriate reporting of methane emissions. The Secretary of State recognises the importance of reducing, reporting and monitoring methane emissions.
102. The Secretary of State is satisfied that project related methane emissions will be subject to an established framework of measurement, monitoring, reporting and mitigation. OGMP2 is an internationally recognised UNEP programme for reducing methane emissions at an asset level. There are also wider UK industry and regulatory commitments and controls to reducing methane, and the Secretary of State is satisfied that it is not necessary to impose additional

²⁴ [OEUK Methane Action Plan 2021](#)

²⁵ [Homepage | Global Methane Pledge](#)

²⁶ [Emissions Monitoring Report 2025](#)

project specific conditions in relation to methane or flaring and venting as proposed by representations.

5.9.7 UK Carbon Budget and Nationally Determined Contributions

103. The proposed project is expected to produce hydrocarbons for up to 11 years covering the years 2026 to 2037. The associated UK carbon budgets for these years are Carbon Budget 4 (2023-2027), Carbon Budget 5 (2028-2032) and Carbon Budget 6 (2033-2037). The relevant NDCs are 2030 and 2035.

Consideration of scope 1 emissions against UK carbon budgets

104. The emissions from production will occur in the UK and the developer has assessed them by reference to the UKCBs. In the further information, the developer has revised the expected carbon budget contribution of emissions (scope 1) previously assessed in the 2022 ES. Overall, the developer notes that the scope 1 emissions represent a relatively small contribution of the relevant carbon budget. However, delays to the project schedule have changed the distribution of those emissions between Carbon Budgets 4 and 5. The revised contribution to Carbon Budget 4 is lower than in the ES, decreasing from 0.0154% to 0.0088%. The revised contribution to Carbon Budget 5 is higher than in the ES, increasing from 0.0134% to 0.0194%. The contribution to Carbon Budget 6 remains unchanged at 0.0012%.

Basis for considering scope 3 emissions against UK carbon budgets

105. The developer also refers to UK carbon budgets during the production period as appropriate benchmarks against which the significance of Jackdaw's scope 3 emissions should be assessed, as well as for scope 1 emissions. This is on the basis that Jackdaw-produced hydrocarbons would contribute to meeting UK gas demand when UK demand is projected to exceed domestic production, which has been and is expected to be the case during the life of the field. The developer states that Jackdaw gas would be processed via the Shearwater hub, including the amine unit that would treat the gas to remove and discharge a proportion of the CO₂ to ensure the produced gas is within the gas quality parameters of the UK's National Transmission System (NTS) as defined by National Gas. The Jackdaw reservoir gas has a CO₂ content of approximately 4%. Emissions associated with removing CO₂ from the reservoir gas, so that the natural gas meets the pipeline standards for export, were assessed as part of the scope 1 emissions. Following processing, the hydrocarbons would be transported onshore to St Fergus before entering the NTS network.
106. The Secretary of State has considered whether it is reasonable to assume that the vast majority of the gas produced by the project is likely to be used in the UK. The Secretary of State notes that the gas will enter the UK gas transmission network as above. Gas entering the UK transmission system is commingled and the UK gas system is connected to international import and

export routes, so it cannot be guaranteed that every unit of Jackdaw gas would necessarily be combusted within the UK. However, the UK has been a net importer of natural gas since 2004 and is expected to continue to import more gas than it produces for the life of the field because natural gas production in the UK continues to decline and remains at the lowest level since 1973²⁷. Whilst the developer does not set out its position on this, the Secretary of State has also considered whether gas would be combusted shortly after production if used in the UK, given that demand for gas exceeds domestic supply. The UK also uses existing gas storage capacity to provide system flexibility, and it is possible that some of the gas from Jackdaw could be stored in these sites for use at a later date – if so, because UK gas storage sites typically inject and withdraw gas within days, it is likely any gas from Jackdaw would only be held for a short period. The Secretary of State therefore considers it reasonable to proceed on the basis that combustion of the volume of gas that would be produced by the project is likely to occur within the project period (as the developer has described) rather than a longer period.

107. On that basis, the Secretary of State considers it is reasonable to treat UK use of the vast majority of the volume of gas produced by the project as likely for the purposes of contextualising the assessment and to consider the scope 3 emissions against the domestic carbon budget for territorial emissions.
108. A respondent to the public notice contended that the use of UK carbon budgets and NDCs to contextualise the project's scope 3 emissions is not relevant nor compatible with the Supplementary Guidance. Under the Supplementary Guidance, developers are expected to consider how a project's emissions impact climate at a global and national level, and the Guidance provides that this is likely to involve assessment against global climate objectives and national objectives where appropriate. For the above reasons the Secretary of State considers it appropriate, relevant and in line with the Supplementary Guidance to consider Jackdaw scope 3 emissions at a national level against domestic carbon budgets, as additional context for considering the significance of the emissions. It would not be appropriate to contextualise the emissions against national carbon budgets alone for this assessment – the guidance states that global emissions are relevant to assessing scope 3 emissions, and there may be combustion emissions outside of the UK from gas displaced by the project gas. The Secretary of State also considers, as indicated in the Guidance, that a numeric comparison of an individual project's emissions against the UK carbon budgets is useful context and emissions can be further contextualised as addressed further below.

²⁷ DUKES (2026): Digest of UK Energy Statistics (DUKES) 2026: Chapter 4. [DUKES 2026 Chapter 4](#)

Assessment of GHGs against carbon budgets

109. The Secretary of State considers that use of domestic carbon budgets to contextualise the project's scope 3 emissions is a cumulative approach, on the basis that the carbon budgets are economy wide and so necessarily take account of emissions from other sources. They are based on scientific projections (and are the subject of advice of the Climate Change Committee) and have been set with a view to meeting the UK's domestic emissions reduction target for 2050 and complying with international obligations.
110. The developer contends that the UK's pathway to net zero, including its statutory carbon budgets and NDCs, assumes continued, albeit declining, use of natural gas during the transition to a low-carbon economy. The estimated life of field for Jackdaw is up to 11 years and there would be no gas production after this time.
111. A comparison is provided in the further information of the projected emissions (scope 1 and scope 3) from Jackdaw with the UK's carbon budget limits set under the Climate Change Act 2008 and the UK's NDCs under the Paris Agreement. (The 4th and 5th Carbon Budgets were set before the Paris Agreement came into force. The 6th Carbon Budget was set after and aligns with the Paris Agreement.) Based on the information provided by the developer, the anticipated scope 1 and scope 3 emissions under a P10 scenario would account for approximately 0.9%, 1.32% and 0.69% respectively of Carbon Budgets 4, 5 and 6. The drop in proportion is due to reduced emissions from Jackdaw as production reduces during the Carbon Budget 6 period.
112. From the further information it is noted that the proposed project's emissions represent a maximum of 1.32% of a relevant UK carbon budget (Carbon Budget 5). The developer argues that "*Jackdaw scope 3 emissions represent a very small proportion of UK carbon budget emissions in 2030 and 2035*" (Part 1 scope 3 Emissions Assessment November 2025 – the Secretary of State notes that the developer wrongly attributes responsibility for setting Carbon Budgets to the CCC. Carbon Budgets are set by the UK Government). The Secretary of State agrees that, in percentage terms, the Jackdaw scope 3 emissions represent a small proportion of the total budgeted emissions during the carbon budget 5 and 6 periods.
113. The developer initially considered (in its 2025 further information) that the UK's NDCs are incorporated within the International Energy Agency (IEA) Announced Pledges Scenario (APS), which the developer presented as a Paris Agreement-aligned emissions pathway. The Secretary of State notes that the APS referred to by the developer was published ahead of the UK's 2035 NDC submission, and that the APS has not been updated since the UK submitted the 2035 NDC. In the further information provided in June 2026 the

developer acknowledged that the IEA APS pathway is associated with a global temperature rise of 1.7°C by 2100 (with a 50% probability), rather than the more ambitious 1.5°C temperature goal of the Paris Agreement. Furthermore, the developer also noted that the APS was not included in the 2025 World Energy Outlook because all states had not submitted NDCs and so it is not up to date.

114. The Secretary of State notes that the UK has met all statutory carbon budgets to date and remains subject to a legally binding framework of progressively tightening carbon budgets under the Climate Change Act 2008. The CCC's most recent assessment is that the UK is on track to meet Carbon Budget 4, but that the pace of emissions reduction must increase substantially if the UK is to meet Carbon Budgets 5, 6 and 7 with confidence. The Carbon Budget and Growth Delivery Plan ("CBGDP") was published in October 2025, setting out the Secretary of State's proposals and policies for meeting Carbon Budgets 4 to 6. Carbon Budget 7 was set in June this year and a further plan, covering the period up to and including Carbon Budget 7, is due to be laid before Parliament under s14 Climate Change Act 2008 as soon as reasonably practicable. The 2025 CBGDP references the potential for emissions reduction from the upstream oil and gas sector through the electrification of platforms between 2030 and 2050. The 2022 ES discussed the potential for electrification and concluded that at this time emissions savings were limited to 36 tonnes CO₂e/yr and costs (in excess of £5 million) would be disproportionate to the emissions reductions achieved. The CBGDP also references upstream decarbonisation efforts through the cessation of routine flaring and venting, with particular reference to the NSTA's role as regulator and the UK's commitment to end routine flaring and venting by 2030, discussed further in paragraphs 100-101 of this document.
115. Some respondents contended that Jackdaw is incompatible with the UK's domestic and international climate commitments, including the Paris Agreement, UK carbon budgets and the 1.5°C temperature goal. They contended that approval would undermine the UK's ability to meet its climate obligations, on the basis that any additional global emissions would exceed or come close to exceeding the global carbon budget given the state of the climate and scientific evidence.
116. The Secretary of State recognises the seriousness of climate change. However, the proposed project's scope 1 and scope 3 emissions, taken together, would not be expected to lead to a material change in overall UK emissions relative to the emissions pathways underpinning the UK's carbon budgets, NDCs and net zero target. Gas demand is anticipated to persist and would otherwise be met through alternative sources of supply (the global perspective is considered below) and there remain legally binding requirements to meet carbon budgets in the CCA2008. The policies to meet

the requirement in section 13 CCA2008 are kept under review, with scope for the Secretary of State to amend the package should she consider this is necessary to fulfil her legal duties. She recognises the need for emissions reductions to meet carbon budgets 5, 6 and 7, but notes that the project's emissions in the UK would reflect existing and anticipated levels of demand. On the basis of these considerations, the Secretary of State has concluded that Jackdaw's emissions (scope 1 and scope 3) would not materially affect the UK's ability to meet its carbon budget and NDC targets.

5.9.8 Cumulation of global emissions and assessing significance

117. Above, the Secretary of State has considered emissions against UK carbon budgets, which is a cumulative approach. As it cannot be guaranteed that all gas will be combusted in the UK and the Supplementary Guidance expects a global assessment, the Secretary of State considers it is also appropriate to consider a cumulative assessment on a global basis, and that there is no single prescribed method for assessing this. While comparison against global emissions reduction pathways provides one means of evaluating whether project emissions are consistent with trajectories to achieve climate objectives, alternative approaches are also available provided they allow a robust assessment. These include the use of global oil and gas datasets, emissions inventories, carbon budget frameworks, or other cumulative assessment methodologies that place project emissions within the broader context of other emissions. The existence of multiple assessment approaches reflects the complexity of evaluating climate effects and provides different ways of understanding a project's contribution to cumulative global emissions.
118. The Supplementary Guidance states that *"If global reduction pathways are used to contextualise magnitude of emissions as above, this approach should be inherently cumulative, as these pathways take into account a wide range of existing and planned projects and other activities"*. Also under this Guidance, characterising a project's scope 3 emissions solely in numeric terms against global GHG emissions is not considered sufficient to give a meaningful expression of the global effect of the scope 3 emissions because of the difference in scale between individual projects and global emissions levels.

The developer's initial assessment of cumulative effects

119. The developer has compared the project's scope 3 emissions to emissions under global emissions reduction scenarios, expressing them as a percentage of the global emissions in those scenarios.
120. The developer initially relied on two scenarios, comparing the project emissions to the global emissions under the IEA Announced Pledges Scenario

(APS) and Net Zero Emissions (NZE) by 2050 Scenario²⁸ (in addition to UK carbon budgets as above). The developer compared project emissions with total world emissions and world oil and gas scenarios under these scenarios, for the NDC target years of 2030 and 2035 (the scenarios' emissions for the net zero year of 2050 were also set out but with no comparison as production at Jackdaw would have ceased by then) – in section 5.3.1 of its 2025 Scope 3 Emissions Assessment.

121. The NZE pathway provides an annual greenhouse gas emissions limit for specific years leading to 2050. For 2030, the NZE pathway projects global CO₂ emissions to decline to around 25 GtCO₂ per year²⁹ and by 2035 to around 18 GtCO₂ per year³⁰. The developer assessed that the scope 3 emissions from the Jackdaw project would equate to 0.0196% of the 2030 total and 0.0075% of the 2035 total. The Secretary of State notes that the total emissions from the Jackdaw Project would equate to around 0.0201% of the 2030 total and 0.008% of the 2035 total³¹.
122. The NZE scenario projects global emissions from the combustion of oil and gas of no more than 14.4 GtCO₂ per year for 2030 and 8.9 GtCO₂ per year for 2035. The developer assessed that the scope 3 emissions from the Jackdaw project would equate to 0.035% and 0.016% of these respectively.
123. The developer stated that this approach was cumulative because the scenarios include existing planned oil and gas projects, as they use the Global Energy and Climate (GEC) model which draws on an extensive survey of sanctioned, planned and announced upstream projects in OPEC and non-OPEC countries. (Section 3.1.4 of its 2025 Scope 3 Emissions Assessment). The developer also considers that its assessment of the project emissions against emissions in the pathways from oil and gas combustion, evaluates cumulative global impacts.
124. The respondents to the first public notice³² contended that the developer's approach was not cumulative because their assessment compared an individual project's emissions with global emissions and demand, albeit in a Paris-aligned trajectory, so that the project would appear insignificant and as a "drop in the ocean"; on this basis, virtually any fossil fuel project could be

²⁸ The APS (included in the World Energy Outlook 2024) assumes that governments fulfil all announced climate commitments and net zero pledges in full and on time, whereas the NZE represents a pathway consistent with achieving net zero CO₂ emissions by 2050 and limiting warming to 1.5°C. The Secretary of State notes that an updated version of the NZE has been published in the World Energy Outlook 2025.

²⁹ [World Energy Outlook 2024](#)

³⁰ [World Energy Outlook 2025](#)

³¹ Scope 3 figures taken from page 38 of the 2025 further information and scope 1 figures taken from page 7-18 of the 2022 ES.

³² This does not include the authorities served with information under regulation 12(5)(a), whose responses to their process were published with representations from the public notice process for transparency.

considered to have an insignificant effect. It was also raised that the developer had considered annual rather than total emissions, but the Secretary of State notes that this reflects the scenarios setting emission levels for certain years leading to 2050. Representations noted that 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.

125. Respondents also contended that the developer's approach failed to contextualise the project's emissions with the cumulative effects of existing and committed production or account for total modelled oil and gas demand in pathways, as it did not address the proportion of that demand already met by existing or approved projects. A representation proposed that this should be done by compiling a baseline on projected emissions from existing fields with assumptions as to whether, how and why they would produce less than their full reserves. Representations raised that the project's emissions should be assessed relative to the available space in the remaining global carbon budget. Respondents considered this to be a robust approach to assessing significance in a cumulative global emissions context, and without this a representation stated that the developer turns a blind eye to the extremely narrow window of opportunity that remains to hold global average temperature rise below 1.5°C and hence fails to acknowledge the dire state of the environment. It was also raised that the Norwegian court has required assessment of compatibility with the remaining 1.5°C global carbon budget.
126. Representations also contended that pathways such as the IEA NZE scenario are not cumulative in a manner relevant to the assessment of the significance of the Jackdaw project. This is on the basis that the IEA's GEC model is similar to Integrated Assessment Models (IAMS) which represent oil and gas crudely, and that they model a mix of energy sources to meet demands determined by the model, rather than at project level or capturing the pipeline of approved or existing developments. Representations raise that the APS and NZE scenarios are expressly exploratory, non-probabilistic and normative, meaning they work backwards from a desired outcome and show emissions under certain policy and demand scenarios. They contended that the developer failed to engage with the uncertainties of the scenarios, and so failed to evidence that they are sufficiently robust forecasting methods. They also raised that the NZE scenario does not justify fossil fuel extraction as it envisages some reserves will need to be left in the ground.
127. The Secretary of State (acting through OPRED) asked the developer in the March 2026 request for further information to explain how the approach taken in the November 2025 further information was cumulative, consider and explain the cumulative effect with other projects and provide fuller contextualisation beyond a percentage comparison against global emissions.

The request for further information raised that the pathways had been treated as forecasts of future emissions, whereas they are scenarios subject to assumptions and limitations which needed to be considered in order to make meaningful use of the scenarios, and that they do not demonstrate that particular scenarios are likely. For example, different scenarios are subject to different assumptions on population growth, economic development, energy systems and other socioeconomic factors that can influence greenhouse gas emissions.

The developer's 2026 further information

128. To address the points raised, the developer provided a further explanation of its approach to cumulation, comparison of the project emissions against the emissions under a wider range of global pathways and scenarios, description of the assumptions and limitations associated with the pathways and scenarios used, and consideration of the project's emissions in the context of the global carbon budget (items 3, 6 and 7, 10 and 11 of the 2026 further information). The developer also referred to the information provided to place the Jackdaw emissions in the context of the current state of the climate (items 6 and 11, referring to item 2), which has been discussed above under the section on the baseline.
129. In response to the request for further information as to how cumulation has been addressed, the developer explained that GHG emissions occupy a unique space for assessing cumulative effects, as their effect is global and so there is no meaningful spatial boundary for identifying other projects and no defensible basis for selecting particular projects to consider cumulatively, as would be the case for systematically assessing other effects cumulatively. The developer stated that there are a number of ways that a cumulative assessment could acceptably be undertaken and cited excerpts from the ISEP guidance to support its explanation.
130. It was contended in a representation that the developer has refused to assess the project cumulatively, by stating 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 emission for assessment over any other"* (on page 58 of the 2026 further information, citing ISEP). Another representation contended that the above passage (quoted more fully on page 45 of the 2026 further information) was used selectively, out of context, to support the developer's proposition that the Jackdaw project cannot be singled out in a cumulative assessment and to decline to assess the project's contribution or conclude on its significance. The Secretary of State notes that this part of the ISEP guidance was referring to treatment of cumulative projects rather than of the project which is the subject of an EIA. But the Secretary of State does consider that the global nature of the impact of GHG emissions distinguishes them from other effects in relation to assessing

cumulative impacts. The Secretary of State considers that the developer has explained that the project's emissions can be assessed cumulatively without comparing them to or cumulating them with specific projects but in a global context, and that it seeks to do so by reference to emissions projections under global pathways and scenarios (taking account of their limitations), the state of the climate and the remaining global carbon budget.

131. In response to the comments in the further information request that the scenarios do not provide forecasts and that their assumptions and limitations needed to be considered, the developer stated that it had considered the Jackdaw project against a range of plausible scenarios for emissions reductions to address the assumptions and limitations inherent in the pathways. The developer stated that pathways are exploratory rather than predictive, and that Paris-aligned pathways and Net Zero policies are benchmarks to test consistency with climate objectives rather than a prediction of outcomes.
132. The scenarios considered included the IPCC SSP1-1.9, which sets out a pathway to limit warming to 1.5°C. The project's projected emissions for 2030 would be 0.0153% of the median global GHG emissions for that year under the SSP 1-1.9 pathway.³³ (There was no data under this pathway for 2035, and Jackdaw would have ceased production for the later years covered by the pathway.) Under the range of scenarios considered, the developer calculated that project's scope 3 emissions would be:
- a. between 0.0079% (IPCC 3-7.0) and 0.0196% (IEA NZE) of the range of emissions for 2030; and
 - b. between 0.0034% (IEA Current Policies Scenario (CPS)) and 0.0075% (IEA NZE) of the range of emissions for 2035.

The developer stated that the SSPs are inherently cumulative because they consider a wide range of GHG sources from natural and anthropogenic activities, and consider the net impact of emissions attributed to sources and sinks.

133. The developer also set out the assumptions and limitations of the pathways and scenarios it had referred to, including that:
- a. The pathways represent alternative futures, rather than predictions. Emissions projections are typically based on Integrated Assessment Models (IAMs), which are simplified representations of complex systems;

³³ Scope 3 figures taken from page 38 of the 2025 further information and scope 1 figures taken from page 7-18 of the 2022 ES.

- b. IMPs and other similar pathways (e.g. NZE scenario from IEA (2023, 2024) and updated by IEA (2025a)) are normative (i.e. designed to achieve a specified outcome) and/or illustrative rather than predictive.
- c. These pathways are designed to demonstrate how temperature or emissions targets can be achieved under defined assumptions, and therefore represent ambitious (yet pragmatic), policy-driven futures;
- d. The pathways are based on assumptions regarding policy, technology deployment, behaviour change, and economic conditions;
- e. No specific likelihoods are assigned to individual pathways;
- f. Emission pathways are not representative of up-to-date global oil and gas production (historic and forecast); and
- g. The outcomes vary significantly depending on the extent and timing of global mitigation action.

134. The further information also provided fuller details of the state of the climate, as discussed in relation to the baseline above (section 5.9.4). This reflects the emissions accounted for at the time the state of the climate was considered.

135. In addition to the points set out above (paragraphs 128-134) further representations raised that the Secretary of State must evaluate the incremental effect of approving the project on the remaining global carbon budget, not whether the project would, in isolation, exhaust the budget. Representations contend that a cumulative assessment should consider the global stock of developed reserves, with some suggesting methodologies for stacking proposed projects above preceding emissions and for assessing these, and concluding that such assessment would show that new production would exceed the 1.5°C target. Representations have also raised that the project emissions should be assessed cumulatively with other proposed UKCS developments, or with future gas extraction from fields in the Shearwater area. They also raise that the Norwegian court has held that cumulative combustion emissions from a country's petroleum projects should be considered within an EIA – in this case, from the UK's petroleum projects. The Secretary of State has had regard to these points as well as to the developer's further information.

Remaining global carbon budget

136. The Secretary of State notes the developer's consideration of the remaining global carbon budget in the 2026 further information and the representations made in respect of this, including those describing the importance of considering this (set out in paragraph 125 above). The Secretary of State notes that the global carbon budget is an estimate of the cumulative net amount of CO₂ that can be emitted while limiting global warming to a specified

threshold with a given likelihood. The remaining global carbon budget estimates the future cumulative net CO₂ emissions that may be emitted from a specified date while maintaining the temperature limit and the likelihood of achieving it. The remaining global carbon budget from the beginning of 2020 was estimated in the IPCC AR6.

137. The developer referred to

- a. the Global Carbon Budget 2025 (Friedlingstein *et al.*, 2026), which is part of annual series of peer-reviewed literature papers seeking to provide updated estimates of the global carbon budget since the most recent IPCC assessment report and
- b. Indicators of Global Climate Change 2025 (Forster *et al.*, 2026), which is part of an annual series of peer reviewed literature papers tracking a set of indicators of the state of the climate.

These peer reviewed literature papers use different methodologies, but on the basis they draw on emissions that have occurred, they are understood not to include combustion emissions for Jackdaw. The Secretary of State considers it appropriate to take account of contextualisation against the global carbon budget as an additional means to evaluate the significance of emissions for the purposes of a project level EIA. The Secretary of State has therefore taken these into account, as well as the points made by the developer and in representations.

138. The developer compared the estimated Jackdaw scope 3 emissions to the remaining global carbon budget, concluding that the project alone would not materially influence the remaining global carbon budget. The developer also stated that *“how quickly remaining global carbon 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”* and that *“Whilst the Jackdaw Project emissions draw from the global carbon budget, the cumulative effect on the global carbon budget depends on the complex interactions between the sources and sinks, both natural and anthropogenic, that will be the result of actions of the international community”*.

139. The developer referred to Forster *et al.* (2023) and an estimated remaining carbon budget of around 1,050 Gt CO₂ from the beginning of 2025 for a 50% chance of limiting warming to 2°C. Against this, the developer compares the estimated Jackdaw scope 3 emissions of 0.0358 Gt CO₂e or approximately 0.01% of those emissions. However, Forster *et al.* (2025) also consider the remaining carbon budget for 1.5°C, 1.6°C, 1.7°C and 2°C for five levels of likelihood. For a 67% likelihood of limiting warming to 1.5°C it was estimated there was a remaining carbon budget of around 80 Gt CO₂ from the beginning of 2025 (Forster *et al.* 2025). The developer made reference to Wood

Mackenzie data and noted that *“Its data on commercially feasible (onstream, under development or probable development) hydrocarbon production, which included Jackdaw, 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”* (a source for this data has not been identified).

140. Respondents to the subsequent public notice raised that the remaining global carbon budget for limiting temperature increases to 1.5°C rather than 2°C should be assessed. The Global Carbon Budget 2025 (Friedlingstein *et al.*, 2026) estimated the remaining global carbon budget from the beginning of 2026 for a 50% probability of limiting warming to 1.5°C at approximately 170 GtCO₂ equivalent to around 4 years at the 2025 emissions levels and down from 235 GtCO₂ in the previous Global Carbon Budget (2024). The corresponding figure in Indicators of Global Climate Change 2025 is 130 GtCO₂. The Secretary of State notes that the 2°C budget reflects the developer’s reasonable future estimate of emissions, but agrees that the 1.5°C budget is appropriate to consider the project in the context of the Paris Agreement objective. Respondents also raised that by referring to an assessment with a 50% chance of limiting warming to a specified goal, the developer’s approach is not in line with the precautionary approach. As above, the Secretary of State notes that the Global Carbon Budget only provides a 50% likelihood, although the Indicators of Global Climate Change give five levels of likelihoods for different temperature scenarios which have also been considered.
141. Respondents to the public notice have provided or cited estimates of the emissions already “committed” by existing or under-development fossil fuel infrastructure. A number of respondents referred to a projection made by Oil Change International which estimates these “committed” emissions to be 936 Gt CO₂ (as at 2018) including 488 Gt CO₂ from oil and gas fields.³⁴ As at 2023, the same organisation (in a briefing cited by a respondent – this was not a journal article and was not peer reviewed) estimates these “committed” emissions to be 915 Gt CO₂ including 469 Gt of CO₂ pollution from oil and gas fields, if fully extracted, against a reduced global budget; and states that 60% of reserves should remain in the ground to stay within the global carbon

³⁴ Trout et al, 2022. This makes a bottom-up assessment of committed reserves from fossil fuel-producing infrastructure – specifically, from the portion of fossil fuel reserves within actively producing or under-construction oil and gas fields and coal mines. These are defined as developed reserves, with reserves being the quantity of fossil fuel deposits that have been discovered and can be commercially extracted. Rystad Energy’s UCube, a commercial bottom-up model is used to estimate developed oil and gas reserves. The article states that the UCube models the investment and operating decisions of 65 000 fields globally (of which around 25 000 are producing or under construction) based on their geology, costs and projected rates of return..

budget for 1.5°C (with 50% probability).³⁵ The committed amount would exceed the remaining budget for 1.5°C if fully extracted and combusted and take up most of the budget for 2°C. The Wood Mackenzie estimate cited by the developer (for which the source has not been provided, but on the developer's information would amount to c. 350 Gt CO₂e) would also exceed the remaining budget for 1.5°C. A respondent also provides another methodology showing that committed emissions already exceed allowable allocations. The Secretary of State notes that scope 1 and 3 emissions combined would be 0.0366 Gt CO₂e and that comparing this to a remaining global carbon budget of 80 or 170 Gt CO₂ (depending on the model and probability) provides context as to the scale of the project globally. She notes that the project emissions would contribute cumulatively to global GHG emissions and, when considered cumulatively with committed reserves, there would be no available budget for this or other project emissions. Respondents contended that approving the project would therefore exceed the global carbon budget and be inconsistent with the 1.5°C target; and that, to be compatible with 1.5°C, the developer would need to show how extraction of gas at Jackdaw would mean that other gas, from existing developed reserves, stays in the ground. The Secretary of State considers that analysis of the remaining global carbon budget suggests additional collective action by states is likely to be needed if the 1.5°C target is to be achieved and considers this in reaching conclusions in relation to GHGs (paragraph 176 below).

The Secretary of State's consideration of cumulation

142. The Secretary of State has considered the project's emissions (scope 1 and 3) in the context of the matters above. The Secretary of State considers that the developer has assessed the projects emissions cumulatively in the global context, taking together its consideration of global emission reduction pathways and the state of the climate, the global carbon budget including the portion taken by committed reserves within these, and UK carbon budgets as considered above.
143. The Secretary of State has noted the developer's explanation of its approach and the representations received as to what a cumulative approach requires (paragraphs 124-125, 129). As set out above, the Secretary of State considers that the global nature of the impact of GHG emissions means that cumulative impacts must be considered in a global context – this is consistent with the Supplementary Guidance (p12).

³⁵ <https://oilchange.org/wp-content/uploads/2023/08/skys-limit-data-update-2023-v3.pdf> Oil Change International Briefing August 2023 written by Kelly Trout of Oil Change International. It is possible but uncertain whether Jackdaw is included within the committed reserves as at the start of 2023, as works begun in 2022 with key construction such as installation of the steel jacket in 2023. Jackdaw appears to be included in the estimate the developer cites in paragraph 139. In any event, if the project were included within the committed reserves, only part of these are within the remaining global carbon budget under the published estimates.

144. The Secretary of State considers the use of global emission pathways or scenarios and the remaining global carbon budget for 1.5°C is appropriate to contextualise the project's emissions. In addition to considering the project against UK carbon budgets, the Secretary of State considers that assessing the project's emissions against the remaining global carbon budget and the amount of this attributable to committed reserves is an appropriate means of considering the project's emissions cumulatively with emissions from existing and approved projects globally. Reported emissions from actual extraction and combustion are counted within the annual update to the remaining global carbon budget, and future emissions from committed reserves in producing and under-construction approved projects are counted within the estimate set out above (paragraph 139 - these emissions also appear to be included within the Wood Mackenzie estimate cited by the developer although the source has not been seen). The Secretary of State recognises that this estimate was last updated at the start of 2023 but considers it reasonable to use the latest such published data given the complexity of compiling it. The developer's reference to the 2°C budget gave a less stringent limit than is considered applicable, though this reflects the uncertainty as to the future of the climate. The literature regarding the global budget and updates referenced by the developer showed the 1.5 and 2°C budget levels and the developer's approach enabled stakeholders to provide information in representations which has also been made publicly available and which the Secretary of State has taken into account.
145. The Secretary of State considers that the significance of the emissions should be assessed in the context of the 1.5°C target. In respect of the developer's consideration of global pathways and scenarios, the Secretary of State has therefore focused primarily on the developer's assessment of emissions under the NZE scenario and SSP 1-1.9, with the project's emissions being 0.0201% and 0.00153% of the global emissions under these scenarios respectively for 2030. The comparison with the APS scenario has not been taken into account for this because it was recognised as being out of date (paragraph 113).
146. The Secretary of State notes that these scenarios are not predictive and do not account for particular oil and gas projects. She considers that comparison against emission estimates under these scenarios is cumulative on the basis that the pathways draw on modelling and global emissions data to demonstrate ways for 1.5°C to be reached globally. That is, the developer has compared the project against emissions under global pathways rather than only against total global emissions. The Secretary of State also notes the limitations and assumptions of the scenarios and that the pathways do not have a likelihood; she notes that these limitations show the need to take account of a range of sources to contextualise the emissions. Whilst the pathways are exploratory rather than setting a forecast with a clear likelihood,

the Secretary of State considers they can be used as a means to contextualise the emissions.

147. The Secretary of State considers that the state of the climate under relevant literature should also be considered to assess significance – again, this is consistent with the Supplementary Guidance. Given the state of the climate and environmental literature as to the likelihood of achieving a 1.5°C target, the Secretary of State considers that a cumulative assessment of Jackdaw should account for the volume of emissions in scenarios or in the remaining global budget that is taken up by other projects.
148. The Secretary of State has had regard to the methodologies proposed in representations for assessing cumulative effects and determining significance, and the conclusions within these (paragraphs 125, 141). The Secretary of State does not discount the proposed methodologies and recognises that a developer may choose to use these approaches to support an assessment of a project. However, the Secretary of State considers the cumulative effects of the project with emissions from other projects may also be assessed more broadly, as in this case.
149. Given the global nature of GHG emissions, the Secretary of State considers it appropriate to assess the cumulative effect of the project with global emissions from all other projects. The Secretary of State therefore does not consider it necessary to conduct a separate assessment of the project's emissions cumulatively with those of other UK oil and gas projects, consented or otherwise.
150. In particular, as regards UK oil and gas projects, emissions from existing UK projects would be already accounted for in the remaining global carbon budget and the UK carbon budget, and in the assessment of committed emissions that will contribute to the remaining budget³⁶.
151. As to other UK-based non-consented projects, the Secretary of State considers that these are not required to be assessed as they are neither existing nor approved projects and, to the extent that they meet the threshold for consideration under EIA legislation they will be assessed individually and cumulatively as part of any approval process. Further, and separately, from the perspective of global emissions it is unclear why local projects seeking approval should be considered as part of a cumulative assessment and not those in other states. It is also not considered possible to carry out a meaningful assessment of all proposed but non-consented projects worldwide. The guidance refers to consideration of planned future projects but envisages consented projects being assessed.

³⁶ There have been no UK oil or gas extraction projects from new fields approved since 2023 when the Trout assessment of committed reserves was last updated – paragraph 141 above.

152. The project emissions assessed include the incremental addition to Shearwater emissions for processing of Jackdaw gas (paragraph 47). In addition, the Secretary of State has considered the emissions for the project cumulatively with the baseline of emissions at Shearwater of 2550 kt CO₂e, recognising that the longevity of the hub would be shortened without the Jackdaw project. (The Secretary of State notes that the baseline figure is necessarily a broad estimate given it includes emissions relating to production from other tied back fields.) These cumulative emissions are c. 39.15 MtCO₂. This does not include emissions at (or transit to) the tied back sites themselves nor scope 3 emissions from combustion of hydrocarbons produced at those sites, though these and the Shearwater baseline emissions would already be accounted for in the global carbon budget and the UK carbon budget.
153. The Secretary of State notes the representation stating that there should be a cumulative assessment with emissions from any future increased production at other fields tied back to Shearwater. This is considered too uncertain for any meaningful assessment to be made. However, the emissions from existing and committed production at these sites would already be addressed as above.
154. The developer's information together with the information provided in representations has enabled the Secretary of State to carry out a fuller cumulative assessment of the project's emissions in the global context by reference to global emission reduction pathways and the state of the climate, as well as global carbon budgets including the portion taken by committed projects within these and UK carbon budgets as above (section 5.9.7). Given the global nature of GHG emissions, the Secretary of State considers this appropriate and proportionate.

5.9.9 Developer's assessment of significance

155. The developer set out a significance matrix to evaluate the likely effects of the project's scope 3 emissions and stated that they have treated the climate system as a highly sensitive receptor. This reflects the Supplementary Guidance, which sets an expectation of use of a form of matrix combining the sensitivity of the receptor against magnitude of the impact, and that the sensitivity level will be high.
156. The matrix draws on the examples of significance criteria in guidance of the Institute of Environmental Management and Assessment (IEMA, rebranded as the Institute of Sustainability and Environmental Professionals (ISEP), the "ISEP guidance"). In the absence of an agreed global significance matrix for greenhouse gas emissions, the developer adapted existing significance criteria, stating that it applied the ISEP definitions which relate to UK carbon budget alignment with a 1.5°C compatible trajectory, in respect of global IEA

APS and NZE scenario trajectories as well. The developer confirmed in response to the 2026 request for further information that it developed a new methodology to assess scope 3 emissions.

157. The developer stated in the further information that GHG emissions from any source are likely to contribute to global temperature change, and therefore the impact of Jackdaw scope 3 emissions on the climate is considered likely. As noted above there is a well-established scientific consensus that GHG emissions affect climate. It is contended in representations that the developer does not conclude that any effect is likely, because the emission reduction pathways used have no likelihood assigned, and because GHGs necessarily cause climate change. Representations contend that the developer therefore does not provide a meaningful assessment of emissions nor show how the pathways can support a conclusion (as to likely significant effects) based on likelihood.
158. The Secretary of State notes that the developer refers to the pathways and scenarios used as being exploratory and not predictive, but that the developer has also referenced UNEP studies including the Emissions Gap Report 2025 and states that this indicates that a temporary exceedance of 1.5°C is now highly likely. The Secretary of State considers that consistency with the pathways can be assessed on the basis that they indicate a way to limit the increase in global average temperature to 1.5°C without being predictive. She considers that climate change and its effects are assessed as likely to occur from Jackdaw GHGs, with the assessment focussing on whether the effects of such GHGs cumulatively with global emissions would be significant.
159. The developer estimates the magnitude of the project's scope 3 emissions as minor in both national and global contexts. As regards magnitude in a global context, the developer states that Jackdaw scope 3 emissions represent a very small proportion of both the projected global emissions and the cumulative future global emissions for oil and gas under the IEA NZE and APS scenarios for 2030 and 2035. This is further discussed in paragraphs 120-1. The developer also states within its evaluation of magnitude that the Jackdaw scope 3 emissions are therefore – that is, based on the small proportions of emissions under the scenarios - not considered to have a likely significant effect on the ability of States to meet global Paris Agreement-aligned pathways that limit warming to 1.5°C (section 5.3.1 of the 2025 scope 3 emissions assessment). The developer seems to conclude there is no significant effect from the magnitude alone, as well as doing so by applying its matrix.
160. Similarly for the evaluation of magnitude in a national context, the developer states that the scope 3 emissions represent a very small proportion of UK carbon budget emissions for 2030 and 2035 (it appears this was intended to

refer to NDCs for those years), a very small proportion of UK carbon budget emissions in the period when Jackdaw is producing, and a small proportion of UK oil and gas emissions under the 2030 and 2035 UK oil and gas emissions scenarios from the 7th Carbon Budgets. The proportions of these scenarios taken up by Jackdaw emissions (scope 1 and 3) for those years would be approximately 4.31% (2030) and 1.79% (2035)³⁷. Again, the developer states that the Jackdaw scope 3 emissions are therefore not considered to have a likely significant effect on the UK's ability to meet its carbon budget targets or global Paris Agreement-aligned emissions pathways that limit warming to 1.5°C.

161. The developer defines a project with minor adverse effects as one that is fully in line with measures necessary to achieve a trajectory towards net zero where GHG impacts are fully consistent with current and emerging policy requirements and good practice design standards for projects of this type. In its initial assessment, the developer further assessed Jackdaw scope 3 emissions from a global perspective as:

- a. not considered to have a likely significant effect on the ability of States to meet global Paris Agreement-aligned pathways that limit warming to 1.5°C on the basis of being a very small proportion of global emissions for 2030 under the NZE and APS scenarios; and
- b. not considered to have a likely significant effect on the UK's ability to meet its carbon budget targets or global Paris Agreement-aligned emissions pathways that limit warming to 1.5°C of on the basis of the continued global demand for gas indicated in the NZE and APS scenarios, the low carbon intensity of Jackdaw gas as compared to the global average intensity stated by the IEA, and the small proportion attributable to Jackdaw of emissions for oil and gas consumption for 2030 under the NZE and APS scenarios.

On this basis, the developer assessed the global effects to be minor adverse and not significant under the matrix.

162. In the national context, the developer further assessed the Jackdaw emissions as not likely to have a significant effect on the UK's ability to meet its carbon budget targets on the basis of the UK's continuing demand for gas, the very small proportion attributable to Jackdaw of oil and gas emissions in UK carbon budgets, and the low carbon intensity of Jackdaw gas.

163. Representations contended that the developer's assessment is flawed because:

³⁷ Quantity for scope 1 and 3 emissions taken from Table 5-5 of November 2025 further information along with Page 7-18 of the 2022 ES.

- a. it relies on emissions from a single project being a small percentage of global emissions, which will necessarily be the case and the Supplementary Guidance states is not an adequate form of assessment; and
- b. it relies on the NZE scenario to justify production when the IEA's finding from modelling the NZE pathway was that there are no new oil and gas fields approved for development in the pathway beyond 2021 and there is evidence that the remaining global carbon budget for 1.5°C is exceeded by fossil fuel infrastructure that is already producing or under development.

164. The developer was asked to clarify the basis for its assessment in the 2026 further information request. The developer stated that its initial assessment relied on oil and gas production being well regulated in the UK with Paris-aligned targets and commitments; and that the UK has published Paris-aligned emission reduction commitments which include ongoing demand for hydrocarbons to 2050. The developer stated that consideration must be given to whether and how a project will contribute to or undermine the achievement of Paris-aligned targets (citing ISEP guidance). The developer referred to compliance with various domestic policies, as examples of contextual information against which a project can be evaluated to determine if it is contributing to or undermining Paris-aligned targets. Most of these relate to scope 1 emissions reduction.
165. The developer also raised UK and industry-wide methane commitments and its approach to methane management as part of the context to determine the significance of the project's GHG emissions. Some respondents to the public notice also raised the treatment of methane; the Secretary of State has considered this above (paragraph 98-102).
166. Whilst much of the developer's further information explaining its assessment relates to UK strategies and arrangements, the developer also sets out its consideration of the project's emissions against the global carbon budget and refers to its further comparisons of the project's emissions to other global pathways (see paragraphs 131-2, 137-141 above).
167. Representations contended that the ISEP guidance is used selectively by the developer and the test for a minor adverse effect is not met. They noted that the conclusion of minor-adverse/non-significant effects is based on policy-based assumptions that: UK oil and gas is a well-regulated industry; UK targets are Paris-aligned; UK carbon budgets include demand for hydrocarbons to 2050; and therefore Jackdaw scope 3 emissions are consistent with policy and good practice. Representations raised that an ISEP-conformant analysis would address 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 - and in doing so would point to the project having significant effects.

168. The Secretary of State has had regard to the methodology described by the developer and its assessment, and considers that the developer’s assessment of the project does not fall squarely within the ISEP approach. The developer appears to have considered aspects of the ISEP guidance in relation to scope 1 emissions and UK combustion emissions, but it is not clear that the global implications have been assessed under the ISEP-based criteria the developer referenced.
169. In concluding that the effects are minor adverse and not significant, the developer places significant reliance on the proportion of emissions under UK and global carbon budgets and global pathways that are attributable to the project, which it considers relatively small, and on the comparatively low GHG intensity of its scope 1 emissions. The Secretary of State notes the proportion of project emissions as compared to global emissions, but also acknowledges the difference in scale between these measures, as raised by respondents. Emissions intensity is considered further in paragraphs 57 to 70.
170. The Secretary of State therefore considers it appropriate to take account of the wider context. The Secretary of State has considered the state of the climate and limited global carbon budget, evidence that worldwide there is already sufficient gas and the wider context that the world is currently off-track to limiting global warming to 1.5°C. She notes that the project would add to total atmospheric greenhouse gas concentrations at a time when emissions must decline rapidly to align with the NZE pathway. The Secretary of State recognises the importance of these matters and takes seriously the UK’s role, and the Secretary of State considers the world being off-track will need to be addressed through collective action on emissions reduction.
171. The Secretary of State notes the contentions that the developer has not engaged with the conclusion of the NZE scenario. The IEA states that the NZE scenario sets out one way to meet the 1.5°C target but acknowledges it is not the only way. Within its NZE Scenario, the IEA concludes that falling demand means that to follow this pathway “no new long lead time conventional oil and gas projects are approved for development”, with investment focused instead on maintaining output from existing fields as production naturally declines. The IEA refers to 'long lead-time conventional oil and gas projects' but does not provide a specific numerical definition of lead time. The Secretary of State notes the proposed Jackdaw development would have virtually no lead time and as such production would begin within months if consented and then cease within 6-11 years.

172. For the reasons set out above the Secretary of State considers it reasonable to conclude in a national context, that the project would not materially affect the UK's ability to meet its carbon budget and NDC targets. However, separately and without reference to the ISEP guidance, the Secretary of State considers that the project's emissions are to be considered on a global basis. In line with EIA principles and the Supplementary Guidance, and given the uncertainty around whether gas displaced by Jackdaw would be produced and combusted and, if so, when and where that combustion would occur, the Secretary of State considers it appropriate to adopt a precautionary approach of assuming all such gas will be combusted.

5.9.10 The Secretary of State's conclusions on atmospheric emissions

173. The Secretary of State is aware that all GHG emissions contribute to climate change. The project will result in an increase in GHG emissions and the Secretary of State considers that the project needs to be considered in the context of global and national climate objectives and targets, in accordance with the Supplementary Guidance.
174. Consistent with the Supplementary Guidance and EIA principles, a precautionary assessment has been made using a P10 high-production case, assuming that all hydrocarbons produced will be combusted, including lifecycle emissions and assessing gross rather than net emissions.
175. In the domestic context, the Secretary of State concludes that the emissions from combustion of Jackdaw gas would not materially affect the United Kingdom's ability to meet carbon budgets or NDCs. There is uncertainty about the emissions associated with displaced imported gas by Jackdaw, and the extent to which the project's natural gas liquids and condensates would be combusted in the UK. Nevertheless, the vast majority of Jackdaw gas is expected to be consumed in the UK, and the associated territorial emissions will be managed by the Secretary of State under the cross-economy carbon budgets framework. Viewed in isolation, this national conclusion could indicate that the effect is not significant.
176. The GHG emissions have also been considered in a global context by reference to emission-reduction pathways, including scenarios aligned with 1.5°C, and the global carbon budget. The developer relies on a comparison of the project's emissions against the global emissions under the pathways and the remaining carbon budget. The project emissions can be considered as being proportionately small in the context of global emissions and the remaining global carbon budget. However, when the emissions from existing and approved projects are considered, there is little if any global budget available. Consideration has been given to the project's emissions in the round, including their scale, their cumulative contribution to global GHG concentrations and wider decarbonisation pathways, and scientific evidence

that substantial and sustained reductions in global emissions are required to limit future warming. The Secretary of State recognises that scope 3 emissions occurring outside of the UK (from gas displaced by the project or by-products of the project) would be additional to and cumulative with emissions from this and other projects. The Secretary of State has also considered the severe effects of climate change, which she takes seriously.

177. No project-specific mitigation has been proposed for scope 3 emissions for EIA purposes, which reflects the developer's position that the project would not have significant effects. The Secretary of State has also taken account of the developer's view that mitigation measures for scope 3 emissions would likely depend on the development of a functioning market for carbon capture and storage, alongside demand for hydrogen, supported by collaboration between government, customers and the private sector over time. The developer proposed mitigations in relation to reducing scope 1 emissions, for the 2022 ES, which remain relevant.
178. The Secretary of State notes that, assuming the gas displaced by Jackdaw would be combusted, the state in whose territory the gas is combusted may well be under its own obligations under the Paris Agreement (provided it is a signatory). However, there is uncertainty about where the gas displaced by Jackdaw, as well as the project's by-products, would be combusted and how the resulting emissions would be addressed by the relevant states. Applying a precautionary approach, it is therefore not possible to rule out likely significant effects as a result of the project's GHG emissions. Taking account of all these points, and as set out above, the Secretary of State considers that the project's emissions (including its scope 3 emissions) would contribute to climate change and that this contribution is to be treated as giving rise to a significant effect on the environment for the purposes of the environmental impact assessment.
179. Whilst the world is off-track to limiting global warming to 1.5°C and the 1.5°C aim is collective, the UK takes seriously its climate commitments and obligations. In particular, the Secretary of State takes seriously the UK's role, including its Common but Differentiated Responsibilities and Respective Capabilities under the Paris Agreement as a developed state.
180. The UK complies with this through meeting its obligations in relation to carbon budgets, pledging ambitious NDCs in relation to territorial emissions and complying with its other obligations and commitments under the Paris Agreement including its provision of financial support. The UK also demonstrates its commitment to reducing emissions more broadly – for example it supports clean energy industries through catalytic public investment and addressing barriers to private investment. A significant amount of the emissions resulting from Jackdaw would be accounted for within the

United Kingdom's ambitious legally binding carbon budgets and NDCs and managed as part of the economy-wide path to net zero. The Secretary of State considers that tackling climate change should carry considerable weight in any balance of competing considerations. Where the gas displaced by, and the by-products of, the project would be combusted in other states, they would normally be included in the national greenhouse gas inventory of the state in whose territory they were emitted, particularly if it is a signatory to the relevant climate treaties. That state would need to have regard to the effect of those emissions as part of its own contribution towards the collective long term temperature goal of 1.5°C, if a signatory to the relevant climate treaties. The Secretary of State has considered representations and science stating that committed emissions from existing infrastructure already exhaust the 1.5°C budget and no new gas is needed if the target is to be reached. The Secretary of State takes the climate crisis seriously and considers the state of the climate demonstrates the need for further collective action. She does not consider that Jackdaw would materially impede or undermine such collective action. Nor does the Secretary of State consider the project to be incompatible with the UK's obligations to take effective measures against the adverse effects of climate change, for the reasons set out above.

181. Further, Jackdaw gas would have a lower production emissions intensity than both the UK Continental Shelf average and the likely mix of imported gas that would otherwise meet demand from UK homes and businesses. The UK can control and reduce, through consenting decisions, the scope 1 emissions associated with the gas produced in the UK and therefore consumed in the UK. The Secretary of State is committed to the transition from fossil fuels but recognises the importance of gas in the UK's energy mix for decades to come, to enable an orderly transition. Whilst the extent of reductions in production emissions compared to a scenario without Jackdaw would be limited and cannot be quantified with certainty, the Secretary of State considers the potential opportunity to reduce the lifecycle emissions of UK consumed gas (as set out in paragraph 59), and in this way to green the UK gas grid, to be important.
182. In light of the uncertainty as to the level of emissions intensity reduction that may occur as a result of production from Jackdaw, the Secretary of State has gone on to consider whether she would agree to the grant of consent if the project were not to deliver any reduction in emissions intensity. The Secretary of State considers that she would still give moderate weight to the GHG emissions arising from the project for the other reasons identified and would still agree to the grant of consent, taking account of all of the other factors that she has weighed.
183. The Secretary of State has considered, in accordance with the Supplementary Guidance, the magnitude and likelihood of the project's contribution to climate

change, the global extent, long-term nature and severity of the resulting effects, and the cumulative nature of the resulting GHG emissions. She has also taken account of the well-established scientific understanding of the relationship between GHG emissions and climate change. In that context, she has considered the project's limited emissions relative to global emissions, carbon budgets and the remaining global carbon budget, together with Jackdaw's expected operational life and the absence of project-specific mitigation for scope 3 emissions. In light of all relevant considerations, the Secretary of State gives moderate adverse weight to the effects of the GHG emissions of the project.

6. Other relevant factors

6.1 UK use of Jackdaw gas

184. Gas demand has declined over the last decade and is projected to further decline as the UK continues to transition away from fossil fuels. However, as that transition occurs, oil and gas will remain an important part of our energy mix for decades to come, including for home heating and power generation during cold winter days, especially when solar or wind power is unavailable. As a result, UK demand for gas is expected to continue, but decrease, through the life of the project.
185. Over the lifespan of Jackdaw, domestic supply will not meet demand and the shortfall will be made up by imports from a combination of sources (LNG, piped gas from the Norwegian continental shelf and interconnectors).
186. Jackdaw gas would enter the NTS at St Fergus. The developer therefore states that *"Jackdaw gas will be used mainly to heat UK homes and business, provide energy for industries and generate electricity"*.
187. The Secretary of State considers that it is reasonable to assume that the vast majority of Jackdaw gas would likely be consumed in UK therefore supporting the domestic market.

6.2 Security of Supply

188. The developer raised that the Jackdaw Project is critical to strengthening UK energy security by maximising domestic gas production and contributing to the secure supply of energy during the transition. To demonstrate this, the developer states that, at peak production, Jackdaw is expected to contribute around 6.5% of UK Continental Shelf (UKCS) gas production and calculated that this would produce an amount of energy equivalent to heating over 1.4 million homes. Some representations raised the role of domestic gas

production in supporting UK energy security and reducing reliance on imported LNG gas as a key reason that the project should proceed.

189. Conversely, other representations contend that those claims are misleading given the relatively limited impact that gas from the Jackdaw project would have on the UK's overall reliance on imported gas. They suggest that even if new fields such as Jackdaw were developed, the UK's reliance on imported gas is set to rise from 55% today to more than two-thirds dependent by 2030; by 2050, the UK could be over 90% dependent on imported gas. They note that the Jackdaw project has the potential to reduce annual gas import dependency by 2% a year on average.
190. The SoS considers that assessment of future gas import dependency should take account of the reduced reliance on gas in the energy system. In none of the scenarios included in NESO's Future Energy Scenarios does the UK start importing materially higher volumes of gas, but as a proportion of gas used that proportion increases.
191. Based on the central production forecast from the developer, at peak production Jackdaw would increase UKCS gas production by up to 4 mcm/d (million cubic metres per day) by 2027/28, which analysis (to verify the information) finds is equivalent to ~6% of UKCS supply³⁸ and could provide gas to about 350,000 homes on a rare cold winter's day³⁹. The SoS considers it more appropriate to use the peak-day figure when assessing the security of supply impacts of the project, as opposed to the annual-average basis, which was used by the developer and spreads a typical household's yearly consumption. Over the field life, however, its maximum contribution to the total amount of gas available from all sources on a peak (i.e. rare cold winter) day would be less than 1%.
192. The Secretary of State has also considered the energy security claims made by the developer and in representations, and analysed how Jackdaw would affect her statutory responsibility to ensure gas system resilience, as measured by the N-1 test, a calculation of supply capability after accounting for the loss of our largest single piece of infrastructure during a 1-in-20 peak demand day. Jackdaw production would make a small but meaningful contribution to gas margins for this winter and could make a more meaningful contribution over the coming few winters.

³⁸ In 2028/29 Jackdaw would still be expected to be ~6% of UKCS supply, despite the absolute production from Jackdaw being lower (3.8 mcm/d).

³⁹ On the coldest (1-in-20) winter day, GB non-daily-metered demand is ~320 mcm, of which ~50 mcm is medium industrial, commercial and business use, leaving ~270 mcm across 23 million domestic gas consumers. This gives roughly 1 mcm/d per ~85,000 homes on a peak day (after adjusting for a small share of 'homes' that are small businesses such as hotels or care homes).

193. Taking the above points into account, the Secretary of State concludes that the gas security of supply impact of the project is small but meaningful. In making this judgement the Secretary of State has recognised that Jackdaw would not materially change the UK's import dependency and also that no individual field supplies a decisive share, but contributes to the cumulative portfolio of supply – domestic production, imports, storage and interconnection – that together underpins the UK's gas security of supply.
194. Some representations contend that Jackdaw would not reduce the UK's current vulnerability to global gas price shocks or reduce bills because the gas price is set by international markets. Other representations argue that without Jackdaw, the UK would import more LNG to meet demand, and that LNG is more expensive than domestic gas. The Secretary of State is of the view that Jackdaw will not materially affect energy prices or consumer bills as the UK is a price-taker in global oil and gas markets. She therefore gives this factor negligible weight in the decision.
195. Given the narrowing of positive margins for the N-1 test (due to overall decline in UKCS gas production and maintained peak demand on rare cold days used in the N-1 test), substantial weight is given to the small but meaningful gas security of supply contribution.

6.3 Impact on infrastructure

196. Hydrocarbons would be exported from Jackdaw via the new 31 km subsea pipeline to the existing Shearwater installation, where they would be processed for onward export to onshore terminals in GB, with gas being transported to St Fergus via the Fulmar Gas Line.
197. The developer states that gas from Shearwater (and by extension Jackdaw) supports continued operation of the St Fergus gas terminal and the Shell Esso Gas and Associated Liquids (SEGAL) System, which together process around one third of the UK's gas demand. They state that this is a nationally important piece of energy infrastructure for the UK and that this part of the UK gas system is reliant on ongoing investment in gas supplies to ensure it has suitable feed gas for its operations. The Secretary of State also notes that gas from Shearwater area fields is (and would continue to be) exported to St Fergus where it enters the NTS, and the vast majority would be used in the UK as part of the energy transition. In the Further Information from November 2025 and June 2026, the developer states that Jackdaw would extend the life of the Shearwater hub and area fields; and may unlock further development (subject to consents). The Secretary of State considers the potential for such further development to involve speculation such that it is not considered possible to carry out any meaningful assessment, and so to be too uncertain to place any material weight on it.

198. Based on this information and officials' operational experience and judgement, the Secretary of State considers that Jackdaw would support resilience of the gas NTS infrastructure, including St Fergus, and extend the life of the Shearwater hub. This is because increased overall volumes and diversity of supply would help it remain buoyant, so that the loss of any single field has less impact.
199. Some representations argued that Jackdaw could lead to increased fossil fuel extraction from the Shearwater area fields. The Secretary of State considers this to involve speculation and to be too uncertain to place any material weight on it. The Secretary of State recognises that Jackdaw is likely to extend the life of Shearwater area fields, but notes that there is uncertainty as to whether there would be additional production as this is distinct from extending the life of a field (e.g. operators may adjust flow-rates from the Shearwater area fields depending on whether Jackdaw is consented, or additional production may require additional consents to occur).
200. The Secretary of State gives moderate weight to the infrastructure benefits and gas infrastructure resilience set out in paragraph 198, as gas will remain an important part of our energy mix over the lifespan of the project and is needed as part of an orderly transition to renewable energy.

6.4 Economic impact, jobs and energy supply chain effects

6.4.1 Jobs

201. The developer information contends that Jackdaw can play a key role in sustaining and transforming the UK's offshore energy workforce. They provided information on both past and future employment and related effects.
202. The developer estimates that, during operation, Jackdaw would create 27 new full-time-equivalent roles and safeguard 273 existing Shearwater jobs that would otherwise be lost when Shearwater would have ceased to operate. Additionally, the developer states that it supports apprentice programmes and that there are 73 apprentices with contractor companies working on Jackdaw.
203. The Secretary of State has considered the employment effects in the context of total employment across the UK offshore oil and gas sector. She notes that some representations contend that the number of jobs supported or safeguarded by Jackdaw is relatively small and the benefit is overstated; whereas other representations raise the importance of employment provided by the project. The Secretary of State recognises the relatively small number of jobs, but notes that the project would have a meaningful impact for the workers, contractors and communities directly affected, particularly through the safeguarding of existing jobs at Shearwater. This distinction also applies to indirect supply chain jobs and induced employment effects.

204. More broadly, employment in the offshore oil and gas sector is expected to decline over the coming decade alongside reductions in investment. Representations raised concerns both for workers and communities that depend on the sector, and for the retention of skills (including apprenticeship programmes to train new workers) and supply chain capability needed to support a managed and just transition. Some representations specifically tied job/skills retention and investment to the project being consented, raising that they expect to be commissioned for future work on Jackdaw. They raised that the lack of a timely and positive decision would have implications for their workforce, investment and planning. The Secretary of State has had regard to representations from companies and industry groups affected as well as those that contend employment effects are too limited to balance against climate impacts.
205. While specific evidence is not available on the transferability of jobs associated with Jackdaw, research by Robert Gordon University suggests that more than 90% of the current oil and gas workforce possesses skills that are transferable to offshore renewable energy, hydrogen and carbon capture, utilisation and storage (CCUS) sectors⁴⁰. In addition, Skills England data shows that common occupations such as engineering technicians, mechanical engineers, or physical scientists will be in strong demand in other critical sectors: primarily defence, advanced manufacturing, life sciences, and construction⁴¹. DESNZ analysis of this data finds that oil and gas workers' skills will be in high demand in these critical sectors, with around 70% of oil and gas workers already employed in occupations identified as a priority for them⁴².
206. Against the scale of anticipated workforce reductions, the Secretary of State considers Jackdaw's contribution to supporting a managed transition is likely to be limited but positive at the margin. The benefits of employment and investment associated with Jackdaw are also expected to be concentrated geographically. As many supply chain companies and the developer's offshore workforce are based in North-East Scotland and North-East England, the economic and employment benefits are likely to be felt most strongly in communities that are also among the most exposed to the long-term decline of North Sea oil and gas production. The SoS considers it especially important to

⁴⁰ Robert Gordon University, 2021. [UK Offshore Energy Workforce Transferability Review](#)

⁴¹ Skills England, 2025. Assessment of priority skills to 2030

⁴² 148 priority occupations are identified across ten sectors in Skills England, 2025, Assessment of priority skills to 2030 – see Accompanying tables (sheet 'Priority occupation growth'). DESNZ analysis finds 70% of phase-down sector employment in 2023 was distributed across these 148 occupations. These 'phase-down' sectors are taken from Climate Change Committee, 2023, A Net Zero Workforce. Employment estimates taken from DESNZ analysis of ONS, Annual Population Survey, 2024, and ONS, Business Register and Employment Survey, 2023. See "Supply pool analysis" in DESNZ, 2025, Clean Energy Jobs Plan: technical annex for methodology.

support the communities of Aberdeen, North-East Scotland and North-East England as we transition to renewable energy.

207. The Secretary of State therefore places moderate weight on the continued employment that Jackdaw provides and its impact on the individual workers and communities.
208. The developer has also submitted information regarding its wider social impact in the UK (including energy skills transition hubs, engineering schemes and other social programmes). The developer notes that their contribution is a product of the cumulative success of the portfolio rather than any individual asset. Whilst the Secretary of State is supportive of schemes that provide social benefit and recognises their value, she gives them negligible weight here because of the extent to which they are removed from the individual decision in question.

6.4.2 Wider economic contribution

209. The developer and representations also raise Jackdaw's economic contribution. In June 2026, the developer provided information relating to the investment in Jackdaw and its contribution to the economy in the form of Gross Value Added (GVA).
210. Spend related to the operational phase of the project is exclusively operating expenditure. The Secretary of State notes that the operating expenditure, employment and other activity during Jackdaw's operational phase could generate around £2.9 billion of GVA which would be additional if consent is granted, averaging approximately £230 million annually during operations. The Secretary of State also notes the context that the United Kingdom oil and gas sector had GVA of around £21 billion in 2025⁴³, though that one individual project will always be a small part of the overall sector.
211. However, some representations contend that the economic case presented by the developer is one-sided. They state that benefits are presented without sensitivities, and damages resulting from climate change not assessed at all. Further, representations assess the damage as a result of heat related deaths at over £16.1 billion, several times the claimed lifetime GVA, before infrastructure damage, air pollution, and non-heat climate mortality are counted. This cost has been calculated based on an assumption that Jackdaw would result in 35.8 MtCO_{2e} in emissions which would result in 8,074 heat related deaths between 2020 and 2100. A Value of Prevented Fatality (VPF) of £2 million per death has been applied to reach the £16.1 billion cost.

⁴³ ONS GDP output approach – low-level aggregates, table 1 (Industry code 06 and 09): [GDP output approach – low-level aggregates - Office for National Statistics](#)

212. The Secretary of State accepts that the project will result in emissions but as set out above, it is not possible to form any non-speculative view on the net impact of the project on global emissions given the CCC's view identified in paragraph 64 and the responsibilities of other countries in dealing with emissions from their own territories and their own climate change obligations. It is also important to view Jackdaw in the wider context of the UK's decarbonisation and Net Zero target. The Secretary of State therefore considers the climate related damages raised in these representations are speculative. Moreover, and in any event, the Secretary of State does not deem the VPF methodology used here to value the impacts to be appropriate: the Government uses a target consistent approach, based on estimates of abatement costs⁴⁴ rather than a damages-based approach (as implied by valuing heat related fatalities).

213. In addition to investment, some representations raised that Jackdaw would have wider macroeconomic benefits, including to the UK's balance of payments. Given the relatively small scale of natural gas trade in macroeconomic terms and the modest expected uplift in production from Jackdaw, the Secretary of State considers that the resulting impact on the trade balance and balance of payments is likely to be limited.

214. Overall, the Secretary of State has given the economic contribution set out in paragraph 210 moderate weight.

6.4.3 Taxation

215. The Secretary of State notes that competing contentions have been made regarding the project's taxation implications. She has considered these.

216. The developer has stated that the UK Government stands to gain substantial tax revenues from Jackdaw, which would be lost if the project does not proceed. No figures have been attached to this specific claim for Jackdaw alone. However, representations raise that if consent were granted to both Jackdaw and Rosebank, there could be projected tax receipts of up to £1.4 billion by 2029 and a total of up to £3.8 billion by 2034 – also published by Offshore Energies UK. Other representations estimate tax relief for both Rosebank and Jackdaw at nearly £4 billion – roughly matching, or even exceeding, expected tax revenue.

217. Corporate structure, overall profitability of the company in the future, capital & investment allowances and future tax policy all impact on tax receipts. Whilst it is inevitable that the project will generate tax receipts in the form of employment taxes, VAT etc., given the broad uncertainties and complexities

⁴⁴ As set out in the HM Treasury Green Book ([The Green Book – UK government guidance on appraisal](#)) and the Green Book Supplementary Guidance on the Valuation of Energy Use and Greenhouse Gas Emissions ([Green Book supplementary guidance: valuation of energy use and greenhouse gas emissions for appraisal - GOV.UK](#))

related to forecasting tax receipts, the SoS has not been able to form a view in which she has sufficient confidence. Therefore, she has considered it as a material consideration but gives negligible weight to potential tax receipts.

6.4.4 Economic effects not dependent on decision

218. Some economic and employment effects have already occurred due to the developer carrying out preparatory construction work (as allowed by the Court of Session). As infrastructure has already been installed at the site, the removal of that infrastructure is required even if consent is not granted. In this respect, the Secretary of State recognises that some employment and economic effects are not dependent on her decision.
219. Some representations put forward the argument that the investment and employment already made in the project should be considered in favour of the agreement to the grant of consent. This situation is unusual. The Court of Session, when quashing the original Jackdaw consent in 2025, made clear that work could continue at the sites whilst a new consent was sought because it is a complex engineering project and it would be disproportionate for the reduction to take effect immediately. However, the court was also clear that this work would be at the developer's own risk and was commercial decision for the developer whether they continue with the project, or make the project safe and take no further action until they have the result of the re-consideration. The Secretary of State recognises the value of the employment and investment to date as well as the unusual circumstances and that these have already occurred. Therefore, although the Secretary of State considers the incurred investment and employment to be a material factor, she has decided to give it negligible weight.

6.5 Alignment with the future of the North Sea

220. The supplementary guidance stated that the Secretary of State would consider the extent to which a project aligned with the Government's objectives for the future of the North Sea. These are set out in the North Sea Future Plan (NSFP):
- Overarching objective: To foster an internationally-leading offshore clean energy industry, which ensures good, long-term jobs, growth and investment in communities across the North Sea, in tandem with a sustainable transition in oil and gas – boosting the country's economy and energy security, in line with our climate obligations.
 - Supporting objective 1: To ensure our oil and gas workers and supply chain can take advantage of the opportunities of our clean energy transition, creating a global blueprint for a transition which supports prosperity, jobs, economic growth, communities and energy security.

- Supporting objective 2: To take a globally standard setting, 1.5°C and climate science aligned approach to future oil and gas production.

221. Representations raise aspects related to these objectives (as set out in the relevant sections above – for example a “just” and “managed” transition and climate science) and the Secretary of State has had regard for these when considering those factors. However, very few representations directly engaged with whether Jackdaw aligns with the government objectives for the North Sea. A few representations raise that the Jackdaw project could align with the 1.5°C target and climate science (supporting objective 2) by requiring the developer to permanently store a rising share of the scope 3 emissions (see Section 7).

222. The Secretary of State considers that the following features of the Jackdaw project are relevant to its alignment with the Government’s objectives for the future of the North Sea:

- Supporting the Shearwater hub indicates alignment with government commitment (as set out in the North Sea Future Plan) to manage existing fields for the entirety of their lifespan and support a sustainable transition in oil and gas;
- Jackdaw's contribution to supporting a managed transition in terms of jobs, offshore energy supply chain companies and communities in north-east Scotland which are the most exposed to the long-term decline of North Sea oil and gas production is likely to be limited but positive at the margin;
- Jackdaw would make a small, but meaningful positive contribution to UK gas supply indicating further alignment with a managed transition; and
- The Secretary of State considers that the design of the project has been reasonably optimised to minimise impacts on the environment associated with Scope 1 emissions. As with any fossil fuel production project, Jackdaw has scope 3 emissions associated with it. All emissions have been assessed as part of the conclusion on significant effects which considers the trajectory to 1.5°C and climate science – and GHG emissions have overall been given moderate adverse weight.

223. The Secretary of State notes that these factors have already been considered and weighed elsewhere, as described earlier in this decision document, and therefore gives no additional positive weight separately to alignment with Government's objectives for the future of the North Sea.

6.6 Impact on the UK's role as a climate leader

224. The UK's influence on climate has been built in significant part on leading by example – and there are clear instances where UK action has helped encourage others to follow. The UK was the first major economy to legislate for net zero in 2019. At least three-quarters of global GDP is now covered by country-level net zero commitments, rising to over 80% when accounting for sub-national governments. The UK co-founded and co-leads the Powering Past Coal Alliance, established in 2017, which has grown to more than 180 members. As COP26 President, the UK helped secure commitments from a broad coalition of countries and organisations to phase out coal power, including a number of countries committing to do so for the first time.
225. The Secretary of State recognises that this influence is strengthened by the consistency between the UK's own actions and what it asks of others. The UK advances global action most effectively through the power of its domestic example.
226. The UK's leadership record is substantial. It has over-achieved against its first three carbon budgets under the Climate Change Act 2008. Its Seventh Carbon Budget, requiring an approximately 87% reduction on 1990 levels over 2038-2042, has been set at a level consistent with the Paris Agreement's 1.5°C goal, and its 2035 Nationally Determined Contribution is among the most ambitious of any major economy. This is underpinned by domestic delivery, including the UK's clean power mission for 2030, the jobs and growth supported by the net zero economy, and continued investment in clean energy sectors such as carbon capture and storage and offshore wind.
227. A number of representations expressed concern that a decision to grant consent for Jackdaw could send a damaging signal internationally, and that it risks weakening the UK's climate leadership at a time when global cooperation remains essential. Others argued that the significance of such a decision lies not only in its direct emissions impact but in the precedent it could set. They contended that if other developers in the UK, or other countries internationally, were to adopt a similar approach, the cumulative effect could become more significant.
228. The Secretary of State recognises that global climate goals depend on the aggregate effect of many individual decisions and accepts that there is a legitimate concern that continued approval of new fossil fuel projects, if replicated elsewhere, could contribute to a gradual erosion of progress towards limiting warming and add pressure to the remaining global carbon budget. She recognises this as a legitimate, if inherently uncertain, concern about the precedent this decision could set for others.

229. Against this, the Secretary of State is mindful that a managed transition recognises that moving to a low-carbon economy requires balancing climate objectives with energy security, affordability and economic stability. International discussions increasingly focus on how countries can reduce dependence on fossil fuels over time while accelerating the deployment of clean energy, electrification and emissions reductions. Maintaining progress on the clean energy transition, while ensuring secure and reliable energy supplies, is a key element of delivering an orderly transition and achieving long-term climate goals.
230. The Secretary of State acknowledges that international standing on climate is important and accepts that a decision to grant consent may not further the UK's international climate leadership. She acknowledges concerns about the potential implications for the UK's credibility and influence - including the difficulty inherent in encouraging other states to move away from fossil fuel production while the UK continues, in a limited and transitional way, to draw on its own domestic resources. She notes that this relates to the development of a licenced field, though accepts this does not fully resolve the underlying tension in the UK's position. She does not underestimate the significance of these concerns but considers this alongside the substance of the UK's wider record, which remains significant.
231. Taking these considerations together, the Secretary of State accepts that the concerns raised are legitimate, and that the potential impact on the UK's role as a climate leader is a consideration that weighs against agreement. The Secretary of State gives it moderate negative weight.

7. Mitigation and conditions

7.1 Features of the project or measures envisaged to avoid, prevent, reduce or offset significant effects

Atmospheric emissions

232. The developer has not proposed project-specific mitigation in respect of downstream scope 3 emissions reflecting that they have not concluded significant effects in respect of GHG emissions. The developer stated that some mitigation measures may be possible in future for some projects, for example if there is a market for carbon capture and storage and sufficient demand for hydrogen. The developer stated that such measures require progressive government policy supported by collaboration between government, customers and private organisations.
233. Representations also proposed a Carbon Take Back Obligation (CTBO), whereby the developer is required to store a rising fraction of the carbon dioxide released from the extracted hydrocarbons being combusted.

Representations also raised the existing work companies operating in the sector are doing to develop carbon reduction development.

234. The Secretary of State recognises that development of carbon capture, utilisation and storage (CCUS) is a key part of the UK's transition to net zero. CCUS has an important role to play in reducing emissions from hard-to-abate sectors, supporting low-carbon industrial growth, and helping to protect and create skilled jobs across the UK.
235. However, there is not an existing policy framework for a CTBO and the SoS considers it likely that primary legislation would be required to provide powers to create a CTBO regime, and that implementing such a regime would take significant time. Moreover, this is a matter of policy which is not for regulatory decisions to address. Noting that the Regulations require her to take timely regulatory decisions, the SoS does not consider it appropriate to impose a CTBO as a condition on this project.
236. In 2022, the developer committed to the following project specific key measures within the ES to avoid, prevent, reduce, or offset any significant adverse effect on the environment from atmospheric emissions, which remain applicable. These measures were:
- a. Management of the export gas specification over field life via operation of the amine unit to minimise the mass of CO₂ vented offshore;
 - b. Re-routing the CO₂ extracted from the produced gas to a dedicated emission point to minimise emissions from the flare;
 - c. Rephasing of wells relating to other fields planned to be produced via the Shearwater installation during the Jackdaw period of production, in order to minimise the cumulative mass of CO₂ vented from Shearwater over the field life;
 - d. WHP design including space and weight capacities and J-tube to accommodate a potential electrification retrofit should green power become available (no further information was provided in the 2025 to 2026 process).
237. The Secretary of State considers that mitigation measures and commitments will be in place to reduce production-related atmospheric emissions to a level that do not have the potential to give rise to a significant effect on the environment. However, for the GHG emissions from the project together (including scope 3 emissions), a significant effect on the environment cannot be ruled out.

Accidental Events

238. As set out at paragraph 31 above it has been identified that a well blow-out from a Jackdaw well could potentially have a significant effect on the

environment. The developer has a number of measures in place to ensure that the risk and impact of a well blow-out occurring is minimised. These preventative measures are:

- a. Multiple well barriers – a primary barrier provided by the suitable overbalanced drilling fluids and a secondary barrier consisting of the well casing and blow-out preventer;
- b. Well control plan – which consists of well control procedures, equipment, training and drills as well as communication;
- c. Relief well plans – which outlines the relevant commitments and procedures for drilling a relief well to abate any well blow-out; and
- d. Oil pollution emergency plan which sets out arrangements for responding to incidents that cause marine pollution by oil.

239. Although a significant effect on the environment would be expected in the case of an unplanned, accidental well blow-out from a Jackdaw well, the mitigation measures and commitments in place above will seek to avoid and/or reduce the unlikely impact as far as possible.

240. The Secretary of State agrees with the developer and the conclusion reached in the 2022 decision that a well blow-out does have the potential to give rise to a significant effect on the environment, however, mitigation measures and commitments will be in place to reduce the risk of a well blow-out occurring to as low a risk as possible.

7.2 Conditions to the agreement of the grant of consent

241. The Regulations require the decision to state any conditions attached to agreement and any features or measures envisaged to avoid, prevent, reduce or offset significant adverse effects. Monitoring conditions must be proportionate to the project and significance of the effects, and account must be taken of relevant existing monitoring arrangements.

242. Conditions were placed on the 2022 agreement to the grant of consent to avoid, prevent, reduce or offset any significant adverse effect on the environment from atmospheric emissions. The Secretary of State considers it appropriate for those operational conditions to remain in place, namely:

- The export gas specification must be managed over the field life via operation of the amine unit to minimise as far as reasonably possible the mass of CO₂ vented offshore;
- The CO₂ extracted from the produced gas must be routed to a dedicated vented emission point to minimise as far as reasonably possible emissions from the flare;

- A meter must remain fitted to the amine unit vented emission point and that meter must meet a standard that is consistent with recognised UK industry standards and is designed, installed, operated and maintained to ensure a consistent level of uncertainty in all operational scenarios.
- The wells relating to other fields that may be produced via the Shearwater installation during the Jackdaw period of production must be phased so as to minimise as far as reasonably possible the cumulative mass of CO₂ vented from Shearwater over the Jackdaw field life.

8. Other Information to Note

8.1 Effects on Relevant Sites

243. In accordance with the Offshore Petroleum Activities (Conservation of Habitats) Regulations 2001 (“Habitats Regulations”), consideration has been given to whether a grant of consent for the Jackdaw project is likely to have a significant effect on a relevant site (for the purposes of the Habitats Regulations). On behalf of the Secretary of State regard has been had to the original Habitats Regulations conclusion in respect of the 2022 ES and the information received in response to the further information notices. The work already undertaken at Jackdaw has also been considered, including the installation of the steel jacket on the seabed, the drilling of four wells, and the laying of the 31km gas pipeline. In light of this, **it is not considered that anything that might be done or any activity which might be carried on pursuant to the consent, if granted, is likely to have a significant effect on a relevant site, whether individually, or in combination with any other plan or project.**

9. The Secretary of State’s conclusions and decision

244. The Secretary of State has reached a conclusion on the significant effects of the project on the environment, taking into account the matters required by the Regulations. The Secretary of State has concluded that the only significant effect for the purposes of the Regulations is a significant effect on the environment as a result of the GHG emissions from the project. A well blow-out also has the potential to result in a significant effect; however, the likelihood of such an event is remote, and the Secretary of State is satisfied that the proposed mitigation measures and commitments will reduce the risk of its occurrence and its potential environmental effects as far as reasonably practicable. These conclusions have been integrated into the Secretary of State’s overall decision.

245. The Secretary of State has considered the overall balance of all relevant factors in considering whether to grant consent. She has weighed the

expected benefits of the project against the potential negative effects. For all of the reasons set out in this decision document, the Secretary of State has decided to agree to the grant of consent under regulation 14 of the Regulations, subject to the conditions above. This agreement does not determine the NSTA's separate statutory decision, remove any other consent or permit requirement, or prejudge any other project.

14 October 2026

Annex A – Summary of representations

1) Representations received during public consultation periods in 2021/22

Three public consultations took place prior to the original decision to agree to the grant of consent in 2022. Only two representations were received from members of the public. Many of the points raised have been superseded by the further information received in 2025 and 2026 but a high-level overview is provided below.

a) Representations considered that change in project scope failed to consider an alternative host installation.

OPRED was content with information from the developer that demonstrated that an alternative host installation was not a reasonable alternative. That position has not changed.

b) Representations considered that the upstream emissions were excessive.

A detailed analysis was provided of the emissions assessed in support of the 2022 ES decision, including proposed mitigation to make amendments at the Shearwater installation in relation to an amine unit to strip out CO₂ from the export gas. The developer subsequently estimated in the further information from 2025 and 2026 that the emissions assessed in the 2022 ES could be up to 11% lower. An overview of that updated assessment is presented in paragraphs 57 to 65 of the decision document.

c) The ES failed to address downstream end use emission from combustion of hydrocarbons

Further information in relation to the assessment of Scope 3 emissions has been provided and the Secretary of State's assessment of that information is presented in paragraphs throughout the decision document.

d) Developer failed to address impacts on the marine environment.

OPRED disagreed with this point and provided a detailed assessment of the impacts of the project on the marine environment in the 2022 ES decision. The developer provided an update in relation to that assessment in the 2025 and 2026 further information. Impacts on the marine environment are presented in paragraphs 20 to 32 of the decision document.

e) Developer was inconsistent and optimistic in assumptions to estimates of cold vented methane; and

f) Developer had not given due regard to alternative to cold venting methane

In relation to cold vented methane, the developer provided clarity in relation to the assumptions used to estimate cold vented methane. The available options for the

safe disposal of cold vented methane were presented by the developer and OPRED considered that alternative cases had been presented.

2) Representations received during public consultation period commencing 21 November 2025

Representations received during the public consultation period raised various issues. By way of summary, key issues raised in the representations received during the public notice period include:

a) *Flaws in contextualisation of project's emissions and assessment of cumulative effects global emissions*

The representations contended that the further information failed to assess the cumulative likely significant effects of the project. Specifically, that the project's emissions need to be contextualised with existing oil and gas projects globally, accounting for production from existing and approved fields. A requirement under a finding of the Norwegian court to assess project emissions in cumulation with national oil and gas projects was also referenced. Representations contended that the further information relied on future scenarios that are not predictors of future extraction or emissions, and that the developer uses the NZE pathway, without engaging with its position that some reserves should be left in the ground. Representations contended that the project emissions should be assessed against available space in the remaining 1.5°C global carbon budget, and that emissions from other oil and gas projects needed to be specifically accounted for to determine the available space when using pathways to contextualise emissions.

Representations contended that, by assuming that the project could be consistent with the NZE scenario, the developer assumed there would be substitution, which is inconsistent with the law and guidance.

Response: OPRED (acting for and on behalf of the Secretary of State) identified that further information was required to assess the emissions in line with the Supplementary Guidance, or explain how the approach taken did so and because, as set out in the Supplementary Guidance, characterising a project's emissions solely as a numerical comparison against global GHG emissions does not provide a meaningful expression of the global effect of those scope 3 emissions. In the further information notice dated 27 March 2026, OPRED required the developer to ensure that the assessment of likely significant effects was consistent with the Supplementary Guidance, including by:

- i) Considering the project emissions in relation to the current state of the climate and global emission reduction pathways;
- ii) Considering and explaining the project's emissions in cumulation with the emissions from existing and approved projects over the life of the field;
- iii) Clarifying how the project is considered to be fully in line with measures necessary to achieve a trajectory towards net zero and therefore how the project scope 3 emissions are aligned with the 'Minor adverse' significance criteria.

In response to the March 2026 notice, further consideration of scenarios was provided, as well as the limitations and assumptions underpinning these. Fuller explanation of the developer's approach was also provided. These have been considered in the Secretary of State's assessment of significance in the decision document.

b) Inappropriate comparison of the project GHG emissions with global / national GHG emissions and by numerical comparison.

Representations contended that the developer relied on a "drop in the ocean" approach of comparing the project GHG scope 3 emissions solely in numerical terms against global and national GHG emissions, and that in isolation the impacts of scope 3 emissions from any project could claim to be insignificant. They referred to the Supplementary Guidance which specifically cautions against this approach.

With regard to characterising the project scope 3 emissions against UK national targets, some representations contended that this is irrelevant for the purposes of assessing the impact of scope 3 emissions and the Supplementary Guidance indicates that project scope 1 and 2 emissions should be considered against the Climate Change Act 2008 and associated UK carbon budget, whereas scope 3 emissions should be evaluated in the context of a global baseline scenario of GHGs.

Response: OPRED considered further information was needed because, as set out in the Supplementary Guidance, characterising a project's emissions solely as a numerical comparison against global GHG emissions does not provide a meaningful expression of the global effect of those scope 3 emissions. In the further information notice dated 27 March 2026 the Secretary of State required the developer to:

- i) update its assessment of GHG emissions, as appropriate, in line with the Supplementary Guidance; specifically in relation to the current state of climate and global emissions reduction pathways.

Further information was provided by the developer in response to the 27 March 2026 notice in relation to the state of the climate and emissions pathways. These points have been considered in the Secretary of State's assessment throughout the decision document.

c) Flaws in assessment of significance, including use of science

The representations contended that the developer's approach to comparing project emissions to those under global pathways does not engage with the state of the climate or reflect scientific evidence that the global carbon budget is virtually exhausted and the world is passing global targets and tipping points. It was contended that approving any new project would breach the 1.5°C global temperature target, and that this is separate from countries' NDCs. Representations contended that the developer does not properly reflect the IEMA / ISEP Guidance, as the developer did not examine possible mitigations. It was also contended that the Government's objective to take a 1.5°C aligned approach to future oil and gas production translates globally into the need for almost 60% of the fossil fuels within already operating or under-construction extraction sites to not be burned.

Response: the science and global budget are considered in the Secretary of State's decision document throughout.

d) Baseline

The representations contended that the further information did not consider global GHGs in the baseline scenario. Representations contended that the further information did not present a baseline in the absence of the project i.e. a 'do nothing' scenario and therefore did not provide a reference point with which to compare the impact of the project.

Response: OPRED considered from its review that the developer had not sufficiently assessed existing and predicted global greenhouse gases (GHG) as part of the baseline or adequately addressed the baseline scenario for climate and the environment over the lifetime of the project in line with the expectations outlined in the supplementary guidance. Furthermore, OPRED noted that the developer had not sufficiently addressed the assumptions and limitations of the selected pathways, which the Secretary of State considered important when using those using pathways to contextualise the project GHG emissions. In the further information notice dated 27 March 2026 the Secretary of State required the developer to:

- i) present information on the global baseline of GHGs;
- ii) consider the baseline scenario for climate and the environment over the lifetime of the project and put it into context of the selected pathways, giving IPPC AR6 and Global Carbon Budget as examples of appropriate pathways,
- iii) consider the assumptions and limitations of the selected model to help contextualise and assess the significance of scope 3 emissions from the project.

In the June 2026 further information response, the developer summarised the current environmental baseline with reference to the factors required by the Regulations (Schedules 6(3) & 6(5)) to provide 'current global observations' including summaries of relevant literature referencing peer reviewed and scientific evidence. The developer provided a future global baseline, basing the projections on the same environmental receptors as identified for the baseline. The developer provided a summary of the assumptions and limitations of the pathways and SSP scenarios used. The Secretary of State has considered these points in paragraphs 71 to 89 of the decision document.

e) Failure to assess all indirect likely significant effects of the project

The representations contended that the further information failed to assess the likely significant effects of the project on the factors identified in paragraph 5 of Schedule 6 to the Regulations - including population and human health; biodiversity, with particular attention to species and habitats protected under any law of any part of the United Kingdom; land, soil, water, air and climate. It was contended that the Regulations require an assessment not just of the amount of greenhouse gas emissions a development will contribute to, but also how those emissions will affect those factors.

Response: OPRED's view was that the developer had not sufficiently addressed all the matters laid down in Schedule 6(4)(f) and 6(5) of the Regulations. Furthermore, OPRED considered that the baseline scenario should include a reasonable future estimate of global GHG emissions affecting the climate over the lifetime of the project, reflecting the expected trajectory of climate conditions and the environment. OPRED sought further information on the project scope 3 emissions in accordance with the Regulations by the further information notice dated 27 March 2026 which required the developer to:

- i) ensure that the assessment of likely significant effects is in line with the requirements of the Regulations and that the assessment should be undertaken against the baseline scenario for the environment and climate and its likely evolution over the lifetime of the project

Further information was provided by the developer in response to the 27 March 2026 notice in relation to Schedule 6(4)(f) and 6(5) of the Regulations, and the baseline scenario for the environment and climate. The Secretary of State has considered these points document in paragraphs 71 to 89 of the decision document.

f) Energy security

Representations raised that the claim in the further information that the Jackdaw project was critical to strengthening UK energy security by maximising domestic gas production was misleading given the relatively limited impact that gas from the Jackdaw project would have on the UK's overall reliance on imported gas. They suggested that even if new fields such as Jackdaw were developed, the UK's reliance on imported gas was set to rise from 55% today to more than two-thirds dependent by 2030, and over 90% dependent by 2050. The Jackdaw project had the potential to reduce annual gas import dependency by just 2% a year on average.

Representations raised that Jackdaw project's gas would not reduce the UK's current vulnerability to global gas price shocks or reduce bills because the gas price is set by international markets. Representations raised that the only way to lower bills, increase reliability and ensure energy security was to transition to clean UK energy.

Representations referenced the Climate Change Committee reports (such as the [Progress in Reducing Emissions: 2025 Report to Parliament](#)) and raised that continued reliance on fossil fuels undermined UK energy security.

Response: the Secretary of State's assessment of the energy security impacts of the Jackdaw project is set out in paragraphs 188 to 195 of the decision document.

g) Economic & societal impacts

Representations raised that a total Gross Value Added (GVA) for the project had not been calculated within the further information, but the claimed value thus far of the Jackdaw project to the UK economy is £2.1 billion. Representations raised that the

further information did not analyse the economic damage that would be caused by emissions from the Jackdaw project, which was likely to be considerable.

Representations calculated the number of heat related deaths attributable to the scope 3 emissions and presented a monetised cost relating to these deaths.

Response: OPRED's review of the information identified that information on GVA was required and in the further information notice dated 27 March 2026 OPRED asked the developer to provide:

- An annual profile across the Jackdaw project's lifespan of the Gross Value Added (GVA) generated - broken down by direct, indirect and induced GVA, including detail of the methodology and assumptions.
- Any uncertainty analysis of GVA generated (i.e. high / low sensitivities).
- An annual profile across the Jackdaw project's lifespan of the investment and cost figures - for example, capital expenditure; operating expenses and decommissioning, with a breakdown of investment / costs.

Information was provided in response and has been considered, to verify and investigate the information on GVA provided.

As to economic damage, the Secretary of State's assessment of the potential for economic and societal damage of the Jackdaw project is set out in paragraphs 211 to 212 of the decision document.

h) Compliance with international law

Representations raised that an assessment is required of the compatibility of the project with the UK's obligations under domestic and international law to take effective measures against climate change. Representations contended that the developer's information did not meet the requirements of the Regulations and caselaw, and that approval of the project would be incompatible with the global 1.5°C target, as set out in point (c) above.

Response: the Secretary of State has considered whether the project is compatible with the UK's obligations under domestic law and international treaties in respect of climate change. The Secretary of State has considered these points in paragraphs 173 to 183 of the decision document.

i) Representations from Joint Nature Conservation Committee (JNCC)

JNCC agreed with the conclusions in the further information that the environmental effects associated with the current project status remained consistent with those in the original Environmental Statement. There are no protected areas within the pipeline route, however JNCC raised the potential presence of individual horse mussels along the route. In subsequent applications received by OPRED, it was considered that the proposed pipeline route may cause mortality of individual horse mussels, however it was assessed by OPRED and it was concluded that this would not affect the long term viability of the species. Ocean Quahog were also found in

some samples along the pipeline route however the resilience of these species to sediment disturbance is noted, and the species are able to recolonise quickly should any be damaged. The Secretary of State has considered benthic impacts in paragraphs 12, and 20 to 26 of the decision document.

JNCC noted that noise modelling should be undertaken for piling, using up to date sound thresholds and mitigation. Noise modelling has been undertaken by the developer using the most up to date thresholds (at the time of application) and the developer adopted JNCC's noise mitigation guidance for injury to marine mammals. The Secretary of State has considered noise impacts in paragraphs 27 to 29 of the decision document.

j) Representations from other Government Bodies

Maritime and Coastguard Agency

MCA stated that the additional information does not change the impact on shipping or navigation and as such had no further comments.

Scottish Government, Marine Directorate (SGMD)

SGMD advised the application should consider how the proposed works comply with Scotland's National Marine Plan. The 2022 ES detailed, in Appendix A, how the proposed project would meet the various objectives and policies of Scotland's National Marine Plan. The Secretary of State has considered compliance with the Marine Plan in paragraph 32 of the decision document.

SGMD also highlighted the need for site specific modelling in relation to discharges and emissions. It is highlighted in the decision document that the site is 220 km east of the UK mainland, with emissions expected to disperse rapidly and impacts will be localised to the site. The decision document discusses discharges to sea and concludes that the impact on water quality from discharges from produced water and drilling discharges is not considered to be significant. Further chemical specific modelling will be undertaken under the developer's applications under the Offshore Chemical Regulations (OCR). The Secretary of State has considered discharges to sea in paragraphs 25 to 26 of the decision document.

SGMD recommend the timing of the operation should be moved based on spawning periods of certain fish species. This comment is not in relation to production from the field. Drilling and other works which may impact on spawning of species has already been completed and an assessment of these impacts undertaken through the appropriate EIA submissions. Commercial fishing and aquaculture and shellfish water protected areas were also highlighted, the developments impact on commercial fishing is assessed within the ES and is in an area of very low commercial fishing. Impacts on fisheries are considered further in paragraph 20 of the Decision Document. Oil spill modelling showed that there is a <5% probability of hydrocarbons reaching the UK coastline and impacting shellfish water protected areas, with less than <0.009% of discharged oil reaching the shoreline. Mitigation

measures and commitments will be in place to reduce the risk of a well blow-out occurring to as low a risk as possible. The developer has committed to put in place mitigation measures that the Secretary of State is satisfied will avoid, and/or reduce the unlikely significant adverse effects on the environment from an accidental event. The Secretary of State has considered accidental events in paragraphs 30 to 31 of the decision document.

National Armaments Director Group

No objection to the project.

Northern Lighthouse Board

No comment to provide with regard to navigational safety.

3) Representations received during public consultation period commencing 8 July 2026

Representations received during the public consultation period raised a number of points⁴⁵. By way of summary, key points raised in the representations received include:

i) Support for Jackdaw:

Representations received during the public consultation period identified several recurring themes among members of the public who supported the Jackdaw development. These included the role of domestic gas production in supporting UK energy security, reducing reliance on imported LNG gas, the comparatively lower greenhouse gas emissions associated with UK produced gas relative to certain imported LNG sources and the application of the UK's high environmental and regulatory standards. They raised that increased domestic production (including Jackdaw) would support security of supply, particularly when international supply chains are disrupted, e.g. during war.

Representations also raised that the project will support jobs, communities (particularly in North East (NE) Scotland), investment, the supply chain and a managed transition. Specifically, they raised that:

- i) Jackdaw has already been constructed with significant investment already made in the project.
- ii) The local community in NE Scotland/Aberdeen is suffering from the decline in UK O&G production. Continued support for oil and gas as part of a managed transition is essential for the local community;
- iii) In the supply chain, a steady pipeline of oil and gas projects (including Jackdaw) is essential for continued investment and recruitment. Representations raise that this has been hampered by the uncertainty around the consenting process. They raise that the UK is losing its skilled offshore workforce overseas due to the decline in oil and gas production. They raise that granting consent to Jackdaw will help maintain a skilled

⁴⁵ Where representations in the July 2026 consultation period raised similar points already outlined in Section 2 above, these points have not been repeated in this Section 3 (and vice versa for points raised from the November 2025 consultation period that are covered in Section 3).

workforce (including training apprentices) and investment in the supply chain needed for the transition to renewables.

Further, representations also raise wider economic benefits such as that Jackdaw would generate tax, including from employment taxes, and would improve the UK's trade position and balance of payments. Specifically, representations raise that Jackdaw and Rosebank 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.

Response: the Secretary of State has considered the points raised around energy security, including the continued UK demand for natural gas, security of supply, and reduced reliance on imports, together with economic considerations such as employment, gross value added and supply chain and regional impacts, in forming a view on the overall balance of advantage of the project. The Secretary of State's assessment on UK use of Jackdaw gas, security of supply and economic impact is presented at paragraphs 184 to 223 of the Decision Document.

The consultation responses in relation to the relative greenhouse gas emissions associated with imported gas, particularly LNG, have been addressed by the Secretary of State in paragraphs 57 to 70 of the Decision Document.

Representations highlighting the UK's high environmental standards and regulatory framework have also been considered within the Secretary of State's assessment through the implementation of the UK's relevant legislative and regulatory requirements.

ii) Objections to Jackdaw

The representations received during the public consultation period identified a number of recurring themes from members of the public who objected to the Jackdaw development and further detail is provided below:

a) Climate Change, global warming and extreme weather consequences

Many representations stated that the current presence of wildfires in the UK and around the world are an indirect effect of burning fossil fuels connected to climate change. The world is witnessing more extreme weather patterns linked to premature deaths, excess heat, NHS pressures in the UK, issues with food security and the wellbeing of future generations.

Response: The Secretary of State has considered current climate baseline and future baselines in paragraphs 71 to 89 of the Decision Document.

b) Scope 3 emissions assessment & compatibility with climate commitments

Representations also called for a scope 3 emissions assessment to be undertaken by the Secretary of State to ensure global cumulative emissions are taken into account. Many objections argued that Jackdaw is not compatible with the UK's climate commitments, the Paris Agreement and carbon budgets, and approval of

Jackdaw would undermine the UK's ability to meet its own domestic and international climate obligations.

Response: The developer has submitted a scope 3 emissions assessment. The project emissions have been considered cumulatively on a global basis, in the context of global scenarios, the global carbon budget and alignment with the Paris Agreement.

Refer to the decision document.

c) International Court of Justice's Advisory Opinion on climate change

Representations have raised that there is now an authoritative legal opinion regarding the obligations of states in respect of climate change. Representations noted that the International Court of Justice confirmed that the duty of States to prevent activities from causing significant harm to the environment and to act with due diligence applied to the climate system; and that failure to prevent such activities – such as through the continued allowance of fossil fuel exploration, production, consumption or subsidies – may constitute an internationally wrongful act. Representations also raised that the Court ruled that the primary temperature goal is the 1.5°C target.

Response: The ICJ's Advisory Opinion on the Obligations of States in respect of Climate Change (the Opinion), as handed down in July 2025, is not legally binding. While the Court found that the customary international law duty to prevent significant harm to the environment applies in a climate context, this is not something which the UK accepts – as made clear in the UK's recent Explanation of Vote in respect of a related UNGA resolution. Nevertheless, we consider the application of the duty, as articulated by the court, should be considered - as a matter of policy rather than legal obligation.

The Opinion makes clear that the duty requires States to act with due diligence in preventing significant harm, clarifying that this is an obligation of conduct (rather than an obligation to achieve a certain outcome). While the standard of due diligence is stringent, what is required by each State will ultimately depend on the specific situation of each State. The test of significant effect under an EIA is different from significant harm for these purposes, and the Secretary of State's conclusion that the project would have significant effect on the environment does not indicate that it would cause significant harm.

The Secretary of State considers that agreement to the grant of consent for the project would not lead to significant harm to the environment or be contrary to the duty.

d) Inappropriate comparison of the project GHG emissions with national and global GHG emissions in an attempt to demonstrate the insignificance of emissions

Representations have raised that the developer makes inappropriate comparison of the project GHG emissions with national and global GHG emissions in an attempt to demonstrate the insignificance of emissions. Representations were also raised in relation to the relevance of presenting the project's emission in the context of UK carbon budgets.

Representations also considered the developer's "minor adverse" conclusion was unsupported, as the developer has not demonstrated that the project is fully aligned with a net-zero trajectory for a 1.5°C temperature goal.

Response: the Secretary of State considers it appropriate, relevant and in line with the Supplementary Guidance (p.12) to consider Jackdaw emissions (scope 1 and 3) against domestic carbon budgets, as additional context for considering the significance of the emissions. It would not be appropriate to contextualise the emissions against national carbon budgets alone for this assessment, and Jackdaw's emissions have been assessed in the global context. The assessment does not solely consider Jackdaw's emissions as a percentage of global emissions, as the Supplementary Guidance notes that this would not on its own provide a meaningful expression of the global effect of those scope 3 emissions, because of the obvious difference in scale between individual projects and global emissions levels. Refer to Atmospherics emissions section of the decision document.

e) Use of SSP2-4.5 pathways to assess Jackdaw emissions

A representation was raised in relation to the use of SSP2-4.5 pathways by the developer to assess Jackdaw emissions, which could lead to warming of 2.7C. It was also considered that the use of SSP2-4.5 pathway dilutes the appearance of Jackdaw's global contribution.

Response: the Secretary of State considers that through using an intermediate pathway (SSP2-4.5) as part of their assessment, the developer has contextualised the emissions as a lower share of these total emissions. The Secretary of State considers that contextualising emissions by reference to emission reduction pathways can be inherently cumulative, on the basis that they are indications of global emissions in certain scenarios, including (under the NZE scenario) to reach the 1.5°C target. Pathways draw on a wide range of projects and activities in order to give a cumulative target or scenario and therefore different scenarios can help to contextualise the emissions from a project. The Secretary of State has recognised the implications of different scenarios in her assessment. See paragraphs 71 to 89 of the decision document.

f) Failure to assess Jackdaw cumulatively

Representations consider that the developer does not provide a lawful or adequate cumulative effects assessment under the Regulations and Supplementary Guidance.

In particular representations consider that the developer has failed to assess Jackdaw's scope 3 emissions in a global cumulative context because it does not account for existing and committed fossil fuel production from operating or approved projects. Instead, the analysis of the developer compares the project against broad modelled oil and gas demand pathways without distinguishing what portion of that demand is already supplied by existing or committed fields.

Respondents criticise the developer's reliance on a 2°C carbon budget and a 50% probability of limiting warming, arguing that these are inconsistent with the Paris Agreement as interpreted by the ICJ Advisory Opinion and with the precautionary principle. They also disagreed with the developer's "project only" framing, saying the relevant question is not whether Jackdaw alone materially affects the global carbon budget, but whether approving it adds emissions to an already constrained or exhausted remaining budget.

Respondents consider when existing and committed oil and gas production is properly taken into account, there is no remaining allowance for new UK oil and gas projects within 1.5°C aligned pathways.

Response: The Secretary of State considers that the global nature of the impact of GHG emissions distinguishes them from other effects in relation to assessing cumulative impacts. As indicated in the Supplementary Guidance, pathways can be considered inherently cumulative on the basis that they are indications of global emissions in certain scenarios, including scenarios for reaching the 1.5°C target. Pathways draw on a wide range of projects, other activities and policies in order to give a cumulative target or scenario. The Secretary of State recognises that pathways and scenarios do not necessarily include details of all oil and gas projects, but as they are recognised to indicate the global position for particular scenarios, including a way to meet the 1.5°C target, they are considered to provide a cumulative global position.

In relation to the global carbon budget, the developer has referred to an estimated remaining carbon budget of 1,055 Gt CO₂e (Forster, 2025; Friedlingstein et al. 2026) from the beginning of 2025 for a 50% chance of limiting warming to 2°C and assesses the project emissions against this. The Secretary of State considers that this provides useful context on the relative scale of the project but it does not alter the fact that the emissions would draw from the remaining global budget and contribute to global GHG emissions. The Secretary of State acknowledges that the 1.5°C budget is relevant to considering the project against the goal of the Paris Agreement to pursue efforts to limit temperature increases to 1.5°C. Refer to paragraphs 117 to 172 of the decision document.

g) Misuse of IEA pathways and Net Zero Emissions pathway.

Representations noted that using IEA pathways do not support new extraction, and that under the Net Zero Emissions scenario, reserves must stay in the ground. Representations considered that the developer conclusion therefore contradicts these scenarios.

The main point raised was that the developer is relying on IEA APS and NZE scenarios, despite acknowledging that they are exploratory and have no assigned likelihood. Representations questioned how the developer has used such scenarios to support a conclusion expressed in likelihood terms, particularly where APS is not aligned with a 1.5°C pathway. The relevance of presenting the project's emissions as a small proportion of global emissions was also questioned, with representations received arguing that this does not demonstrate consistency with Paris-aligned pathways.

Response: The developer has sought to use the following approach in their submission: (i) quantifying total scope 3 emissions; (ii) contextualising those emissions against global decarbonisation pathways as well as UK carbon budgets and NDCs on the basis that Jackdaw hydrocarbons are likely to be combusted in the UK; and (iii) assessing whether the emissions are compatible with global pathways intended to achieve net zero.

The Secretary of State acknowledges that it is the IEA NZE pathway that is relevant to considering alignment with a global temperature increase of 1.5°C whereas the IEA APS pathway projects a global temperature increase of 1.7°C by 2100 rather than the target of 1.5°C which the Paris Agreement targets. The Secretary of State notes that the consideration of the remaining global carbon budget suggests that there is likely to be a need for additional collective action by states if the 1.5°C target is to be achieved. Refer to paragraphs 117 to 172 of the decision document.

h) Lack of evidence to support substitution

Representations received considered that the developer's analysis is assuming substitution with no evidence to support this. A central criticism is that the developer assumes climate outcomes and gas consumption would be largely unchanged with or without Jackdaw because other projects would fill demand.

Response: As outlined in the Supplementary Guidance, substitution is not considered to be a factor affecting whether scope 3 emissions from the project should be assessed. The developer does not attempt to demonstrate whether there will be a high degree of substitution of imported gas from Jackdaw or that there will be no other demand for the international gas supplies that are substituted by the new UK fields. The Secretary of State has not made an assumption of substitution when considering likely significant effects on the environment from the scope 3 emissions, but has considered the gross emissions from the project.

i) Significance tests conclusions on 'minor/adverse' is incorrect

Representations considered that the significance test the developer has used concluding 'minor/adverse' is incorrect and would allow all fossil fuel projects to be approved. It was considered that the developer's "minor adverse" conclusion is unsupported because it has not shown that the project is fully aligned with a net-zero trajectory consistent with the 1.5°C temperature goal. Representations also considered that the developer has also used an unexplained methodology to conclude that the project is 'minor adverse/non-significant'.

Response: The Secretary of State has considered whether the project would have a likely significant effect on the basis that a broad approach is required for the EIA process. The Secretary of State considers that it is appropriate for methodologies to be based upon published scientific data and evidence. Refer to paragraphs 117 to 183 of the decision document.

j) Failure to assess Schedule 6 factors.

Representations raise that the developer has not properly assessed the project's likely significant effects under Schedule 6, paragraphs (4)(f) and (5) of the Regulations. Representations consider that the developer has described future climate warming scenarios but has not used those scenarios as a proper environmental baseline, nor assessed the project's indirect greenhouse gas impacts on the required environmental factors, such as population, human health, climate, biodiversity, land and water or cultural heritage. It was also argued that the assessment of the developer fails to consider how climate impacts interact with those factors over the project's lifetime.

Representations also questioned whether the developer had provided an adequate description of reasonable alternatives, and raised concerns about the impact of drilling in the North Sea on marine ecosystems.

Response: The developer summarised the current and projected environmental baselines with reference to the Regulations (Schedules 6(4)(f) & 6(5)) to provide 'current global observations' and projected changes including summaries of relevant literature referencing peer reviewed and scientific evidence. (Tables 1 and 2 of the developer's responses to regulation 12(1) notice (27th March 2026)). The summaries focus on the environmental indicators of surface temperature, extreme weather and climate events, sea level rise, cryosphere changes, oceanic changes, acidification, biodiversity, population and human health, material assets, cultural heritage and the landscape. The Secretary of State considers that the developer's provision of multiple baselines and their contextualisation of the emissions within these baselines provide adequate information for the Secretary of State to use as part of the determination of the likely significant effect. Refer to the decision document.

As noted above, the Secretary of State is content that the developer has provided sufficient information on alternatives, and assessed why these are not reasonable alternatives. The Secretary of State's conclusion on the environmental effects of the

project, including effects on marine mammals and fish, seabed habitats and other aspects of the marine environment, is set out in the decision document.

k) Misapplication of ISEP guidance.

Representations raised that ISEP guidance has been incorrectly applied, and that the developer has selectively quoted the ISEP guidance but not applied it as a whole. Representations consider that the ISEP guidance has been interpreted incorrectly to justify not assessing project-specific cumulative effects; and that the project has been wrongly presented as incapable of having a measurable climatic effect because it contributes only a small percentage of global emission. Representations received noted that the Guidance actually requires assessment of individual project contributions within the wider cumulative climate context.

Response: The developer has sought to quantify total scope 3 emissions and contextualise those emissions against global decarbonisation pathways, including scenarios intended to achieve net zero, and the global carbon budget, as well as UK carbon budgets and NDCs on the basis that Jackdaw hydrocarbons are likely to be combusted in the UK. Please see further discussion in paragraph 167 to 172 of the decision document.

l) Preparation of further information by competent expert.

A representation raised that there were shortcomings in the response provided by the developer in the further information and questioned whether that information had been prepared by a competent expert in accordance with regulation 8(3) of the Regulations.

Response: A statement has been provided by the developer to confirm that the further information was prepared by competent experts.

m) Failure to support the ‘beneficial net effect’.

Representations consider that the developer has failed to support the ‘beneficial net effect’ by stating that producing domestic gas from Jackdaw may produce lower emissions than importing LNG. They also considered that the developer’s comparison with LNG was unsupported because no evidence was presented to demonstrate that LNG would be displaced by Jackdaw gas. Representations also noted that the comparison focuses on operational emissions (Scope 1) rather than combustion emissions (scope 3), noting that the scope 3 emissions will have a more significant impact on climate. The assumption that LNG would be the displaced alternative supply is not evidenced while imported Norwegian pipeline gas may have lower production emissions than UK production. Overall, some representations considered that the developer’s asserted beneficial net gain was unsupported and was inconsistent with the Supplementary Guidance.

Response: Using the carbon intensity figures provided by the developer and the NSTA, the carbon intensity of Jackdaw gas is lower than the UK average, and significantly lower than LNG imports. The developer does acknowledge that combustion emissions are broadly similar irrespective of the source of the gas. The carbon intensity discussion relates primarily to differences in upstream and midstream supply chain emissions between alternative sources of gas. The Secretary of State has assessed the significant effects on the assumption of no substitution. See paragraphs 57 to 70 of the decision document.

n) Employment and economic factors

The claims from the developer around job creation and economic benefit to the UK are disputed. Some representations raise that the economic case presented by the developer is one-sided. They raise that benefits are presented without sensitivities, and economic cost of damages resulting from climate change (e.g. disease, crop loss, heat related death) not assessed at all. They also raise that Jackdaw would only create 27 new direct jobs. It is claimed by some representations that renewable energy alternatives would provide more jobs and energy security, and that tax relief/subsidies for oil and gas sector undermines the economic justification provided by the developer.

Response: The Secretary of State's assessment of employment and economic factors is set out in paragraphs 201 to 219 of the decision document.

o) Energy bills, energy security and international markets

Representations were made regarding the fact that Jackdaw will not contribute to lowering energy bills, and that oil and gas are traded on global markets so there is no energy security of supply.

Response: the Secretary of State's assessment of security of supply impacts is set out in paragraphs 188 to 195 of the decision document.

p) Climate leadership

Representations raised that a decision to consent Jackdaw would send a very damaging signal internationally. 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.

Response: The Secretary of State's assessment of the impact of granting consent on the UK's role as a climate leader is set out in paragraphs 224 to 231 of the decision document.

q) Adequacy of consultation

Representations questioned whether the timing and publicity of the consultation on the 2026 Further Information provided a sufficient opportunity for the public to consider and respond to the material.

Response: The Secretary of State is satisfied that the consultation on the Further Information complied with the timing and publicity requirements under the Regulations. The public consultation was publicised on the developer's website, the gov.uk page for the Jackdaw environmental assessment, the Daily Telegraph and the Press and Journal. The consultation ran for more than 30 days (from 8 July to 10 August) and was one of multiple public consultations on information submitted by the developer (with other consultations in 2021/2022 and November to December 2025, as set out above).

r) Broad policy changes

Many representations suggested broad policy changes, including accelerating/increasing investment in renewables, increasing gas storage capacity, and changes to the tax system for oil and gas e.g. ringfencing revenue.

Response – This is a regulatory decision and therefore the assessment undertaken by the Secretary of State relates to the proposed Jackdaw project and not wider government policy.

s) Proposals for conditions, including for a Carbon Takeback Obligation (CTBO)

Representations raised that, should Jackdaw be granted consent, a CTBO should be attached as a condition, whereby the developer is required to store a rising fraction of the carbon dioxide released from the extracted hydrocarbons being combusted.

Response: For the reasons set out in paragraphs 233 to 235 of the Decision Document, the Secretary of State does not consider it appropriate to impose a CTBO as a condition on this project.

Representations have proposed that a condition should be imposed in relation to methane management.

Response: The Secretary of State is satisfied that project related methane emissions associated with the project will be subject to an established framework of measurement, monitoring, reporting and mitigation. The developer's voluntary participation in OGMP2 is in an internationally recognised UNEP programme for reducing methane emissions at an asset level. There are also wider UK industry and regulatory commitments and controls to reducing methane, and the Secretary of

State is satisfied that it is not necessary to impose additional project specific conditions in relation to methane or flaring and venting as proposed by representations. Methane management is covered in paragraphs 98 to 102 of the decision document.

Annex B - Summary of procedural history

1. The Environmental Statement was submitted on 6 May 2021. OPRED, acting for and on behalf of the Secretary of State, requested further information on 17 June 2021 and the developer responded on 28 June 2021. Following assessment, a decision was taken on 28 September 2021 not to agree to the grant of consent.
2. The developer proposed changes and OPRED requested further information on 14 October 2021. A revised Environmental Statement and project summary were submitted on 22 February 2022. Further information was requested on 13 May and provided on 17 May 2022. The Secretary of State agreed to the grant of consent on 27 May 2022 and the Oil and Gas Authority granted consent on 1 June 2022.
3. The developer reached a final investment decision in July 2022 and construction and installation works began in 2023. Greenpeace challenged the grant of consent in July 2022 in the Scottish Court of Session.⁴⁶ The proceedings were paused pending a judgment of the Supreme Court in the case of *Finch*.⁴⁷ On 20 June 2024 the Supreme Court held that downstream combustion emissions were indirect effects which had to be assessed for the Horse Hill project.
4. In January 2025 the Court of Session held that the Jackdaw consent was unlawful because downstream emissions had not been taken into account. The consent was reduced (quashed), with the effect suspended while a fresh application and decision were pursued. The developer was permitted to continue works at its own risk, but no extraction or production of hydrocarbons was permitted. The wellhead platform was installed in October 2025 and drilling completed in February 2026.
5. OPRED requested a scope 3 emissions assessment and updated whole-project assessment on 21 July 2025. The developer responded on 2 September 2025. OPRED sought further information on 22 September 2025, and the developer responded on 5 and 6 November 2025. That information was publicly notified from 21 November to 22 December 2025.
6. OPRED issued a further regulation 12 request on 27 March 2026 covering scope 3 emissions, current and future baselines, cumulative effects, scope 1 emissions, significance and wider benefits. The developer responded on 19 June 2026. The material was publicly notified from 8 July to 10 August 2026.
7. Five public consultation exercises were completed and details provided below:

⁴⁶ [2025csoh10-petitions-by-greenpeace-limited-and-uplift-for-judicial-review.pdf](#) , [2025] CSOH 10

⁴⁷ R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents) [2024] UKSC 20
https://supremecourt.uk/uploads/uksc_2022_0064_judgment_c3d44bb244.pdf

- i. The ES and the summary of the project was subject to public consultation, for which the public notice was published on 10 May 2021 and ended on 9 June 2021. There were no public representations received.
- ii. Some of the further information provided on 28 June 2021 engaged regulation 12(3), and was subject to further public consultation, for which the public notice was published on 6 July 2021 and ended on 5 August 2021. There were no public representations received.
- iii. The further information provided on 22 February 2022 engaged regulation 12(3) and was subject to further public consultation, for which the public notice was published on 18 March 2022 and ended on 18 April 2022. Two public representations were received.
- iv. Following reduction of the consent by the Scottish Court of Session (see table 1), further information was provided on 5 and 6 November 2025. This engaged regulation 12(3), and was subject to further public consultation, for which the public notice was published on 21 November 2025 and ended on 22 December 2025. Four public representations were received, and a further representation was received after the public consultation period ended.
- v. The further information provided on 19 June 2026 engaged regulation 12(3), and was subject to further public consultation, for which the public notice was published on 8 July 2026 and ended on 10 August 2026. A total of 399 representations were received. A further 15 representations were received after the public notice period closed. The Secretary of State is not required to take these late responses into account but has satisfied itself that they contain no novel points to address.

All representations received up until midnight of 10 August 2026 were considered during the ES review process. The decision and Annex A explain how these representations were taken into account.

- 8. The relevant authorities were consulted on the Environmental Statement and further information and did not object (See Annex A).
- 9. Due to the location of the proposed development, Norway was notified in accordance with regulation 13 to offer the opportunity to participate in the EIA process. Norway confirmed that they did not wish to participate in the EIA process.
- 10. The Secretary of State has considered all material environmental information, representations and authority responses in reaching the decision.