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17 August 2026

Dear Secretary of State

Representation from the Weald Action Group regarding the Rosebank Oilfield Development Project (reference: ES/2022/001)

Introduction and overview

The Weald Action Group is a collaboration of community groups and campaigners against all forms of oil and gas extraction across the Weald and the south-east of England.

We, with Sarah Finch as the claimant, initiated the judicial review of the Horse Hill onshore oil development, *Finch v. Surrey County Council* ('*Finch*'),¹ which led to the June 2024 Supreme Court judgment on the requirement to include downstream scope 3 impacts in environmental assessment for fossil fuel developments.

It was as a direct result of our success that the Court of Session ruled that the previous consent for the Rosebank development was unlawful, and that Adura has had to submit new further information regarding an assessment of the climate effects of scope 3 emissions.

We made a submission to the previous consultation on Rosebank in November 2025 and the concerns we raised then still stand.² This second representation is in response to the new information provided by Adura, dated 19 June 2026³, in response to OPRED's March 2026 request for further information⁴. Specifically, we are responding to Part 1: Scope 3 Emissions Assessment Document.

¹ R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council and others [2024] UKSC 20. <https://www.supremecourt.uk/cases/uksc-2022-0064>

² Representation from the Weald Action Group regarding the Rosebank Oilfield Development Project (reference: ES/2022/001), 20 November 2025. [Weald-Action-Group-Submission-Reference-ES.2022.001.pdf](https://assets.publishing.service.gov.uk/media/6a58b37e31fb6daf31413817/Rosebank_Further_Information_Reg12_1_Response_redacted.pdf)

³ Adura, Rosebank Development: Responses to Reg 12(1) Notice (27th March 2026), 19 June 2026. https://assets.publishing.service.gov.uk/media/6a58b37e31fb6daf31413817/Rosebank_Further_Information_Reg12_1_Response_redacted.pdf

⁴ OPRED, Letter to Adura Operations Ltd, 27 March 2026. https://assets.publishing.service.gov.uk/media/69c6a22c43217762153609e8/12_1_FINAL_for_issue_27_March_2026_Redacted.pdf

We also want to make an overarching point about public participation. The Supreme Court’s ruling in our case affirmed the important role of informed public participation in environmental-decision making. Key to the Court’s finding was that, for the Environmental Impact Assessment (EIA) regime to function effectively, and for decisions to approve projects with likely significant environmental effects to be made lawfully, those decisions must be subject to “*public debate*” and made with “*full knowledge of the environmental cost*” (para. 3). The Court held that “*public participation is necessary to increase the democratic legitimacy of decisions which affect the environment*” (para. 21).

That is particularly the case for decisions relating to climate change. As the Court said, these decisions will often be made within a political arena with competing economic, social and environmental considerations. This “***enhances the importance***” of “*comprehensive and high-quality information about the likely significant environmental effects of a project*” (para. 153, our emphasis).

In this case, Adura has not provided information requested by OPRED. For example, they dismiss your request that they assess the likely significant effects of the project on the environment including matters such as population, human health and biodiversity, in line with the EIA regulations, as being not possible, or not required by the Institute of Sustainability and Environmental Professionals Guidance on Assessing Greenhouse Gas Emissions and Evaluating their Significance (ISEP Guidance, see section 6 below). And OPRED made several requests for clarity regarding how emissions associated with current and approved fossil fuel projects are taken into account in the assessment. Adura failed to provide this clarity.

Adura has failed to provide all the information necessary to enable informed public consultation, and so the public is not able to take part in the consultation with full knowledge of the effects that would arise were the Rosebank development go ahead. Therefore the decision cannot be made with “*full knowledge of the environmental cost*”. As Supreme Court Judge Lord Leggatt said of the Horse Hill case, “***the potential global warming effect of the proposed development ... should have been properly assessed so that public debate could take place on an informed basis. That is a key democratic function of the EIA process.***” (para. 154).

We further note that last year, 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. 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.⁵

Response regarding Part 1: Scope 3 Emissions Assessment Document

1. The competence of the author of the document has not been demonstrated

The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020 (hereafter, ‘the Regulations’) Regulation 8(3) requires developers to “*ensure that (a) the environmental statement is prepared by competent experts; and (b) the*

⁵ International Court of Justice, Advisory Opinion on the Obligations of States in respect of Climate Change, 7 July 2025. <https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-00-en.pdf>

*environmental statement is accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts”.*⁶

The Environmental Statement published by Equinor in September 2025 included details of the qualifications of the Xodus and Equinor staff who wrote it. The Further Information supplied by Adura does not.

2. Wrong approach to assessing significance

Adura’s assessment of the ‘significance’ of Rosebank’s effects on the climate does not meet the requirements of the Regulations or the Supplementary guidance for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects published by the Department for Energy Security & Net Zero in June 2025 (hereafter, the Supplementary Guidance).⁷

Adura says: *“The assessment in Equinor (2025) demonstrates that the Rosebank Development’s emissions:*

- *Fall within the range of emissions factored into Paris Agreement–aligned scenarios.*
- *Represent a small incremental contribution to total global emissions.*
- *Are consistent with projected residual demand for oil and gas in Net Zero transition scenarios and do not represent a material proportion of the remaining emissions ‘space’”.*

On this basis, they conclude that the effect of the development’s downstream Scope 3 emissions on climate is *“not significant”*. We dispute each of the three points, arguing that

- Rosebank’s emissions do not “fall within” 1.5°C-aligned scenarios, which are the only ones that are relevant here.
- There is no room for even small incremental contributions to total global emissions in 1.5°C-aligned scenarios.
- Whether oil from Rosebank would meet residual demand is irrelevant as there is no remaining ‘space’ for emissions in the remaining 1.5°C carbon budget.

We discuss each of these points below, and make some additional comments.

3. Failure to place Rosebank’s greenhouse gas emissions within a global cumulative emissions context which takes into account the emissions from current and approved fossil fuel projects

The Regulations require assessment of the *“cumulation of the impact with the impact of other existing or approved projects”*. OPRED makes several requests for Adura to clarify how emissions

⁶ The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020, Regulation 8. <https://www.legislation.gov.uk/uksi/2020/1497/regulation/8>

⁷ Department for Energy Security and Net Zero, *Environmental Impact Assessment (EIA) – Assessing effects of downstream scope 3 emissions on climate*, June 2025. https://assets.publishing.service.gov.uk/media/6853fa3d1203c00468ba2b15/Supplementary_guidance_-_Effects_of_Scope_3_Emissions.pdf

associated with current and approved fossil fuel projects are taken into account in the assessment. For example:

- Paragraph 16: “Explain how the assessment accounts for emissions associated with **current and approved fossil fuel projects** (i.e., how much demand/ emission reduction pathway “space” is already met by existing/approved supply), and how this affects your conclusions” (our emphasis).
- Paragraph 19: “Please update your assessment where any emission reduction pathways or IMPs from various sources are used, to acknowledge the assumptions and limitations for the purpose of contextualising and assessing the significance of the scope 3 emissions from the project. This assessment of the cumulative effects of the scope 3 emissions may also benefit from global oil and gas datasets and inventories. **There are multiple sources of projected emissions from current plans and projects you may wish to consider**, such as IISD (2022), Muttitt et al (2025), IEA (2023), UNEP (2023) - Figure 2.2, Trout et al (2022)” (our emphasis).
- Paragraph 25: “Please therefore update the assessment as appropriate to explain how cumulative global effects have been considered. In doing so, it may be useful to expand on the global carbon budget discussion ... by placing the Rosebank project’s GHG emissions in the context of remaining IPCC AR6 global carbon budgets, **alongside emissions from existing and planned projects over the life of the field**. This would help clarify how cumulative emissions relate to a 1.5°C Paris-aligned trajectory and inform conclusions on the significance of effects” (our emphasis).

In all cases Adura’s responses fail to include the information requested. Often they present a confusing picture. For example Adura continues to insist that “*the modelled scenarios and pathways considered in Equinor (2025) already utilise available forecasts for oil and gas production*”. This is despite the fact that they also acknowledge that “*Emission pathways are not representative of up to date global oil and gas production (historic and forecast)*” (page 55).

They also say, “*OPRED reference IEA (2023) and SEI et al. (2023) ... were considered in the assessment in Equinor (2025)*” (page 55). However, they fail to acknowledge that both these studies concluded that no new oil and gas production can be allowed under 1.5°C-aligned scenarios, with a significant proportion of existing infrastructure required to end production early.⁸

As noted by OPRED, multiple estimates of emissions from operating or under development fossil fuel infrastructure are in the public domain. For example in 2022 Trout et al. forecast that emissions from the burning of the oil, gas and coal in infrastructure already operating or under development equated to 936 GtCO₂ (around 446 GtCO₂ from coal, 323 GtCO₂ from oil and 165 GtCO₂ from gas)⁹. This volume of emissions massively exceeds all 1.5°C aligned remaining global carbon budget forecasts.

Adura refuses to consider these sources, stating: “*Oil and gas databases and inventories, including Rystad’s UCube database, organisation / oil and gas company forecasts and other reports (e.g. IISD, 2022; Muttitt, 2025; Trout et al., 2022) can provide useful insights into project-level supply outlooks but are potentially constrained by the uncertainties in predicting future production*”. However, all

⁸ Stockholm Environment Institute, *The Production Gap*, 2025. <http://productiongap.org/2025report>.

⁹ Kelly Trout et al., ‘Existing fossil fuel extraction would warm the world beyond 1.5°C’, *Environmental Research Letters*, 17: 6, 2022. <https://iopscience.iop.org/article/10.1088/1748-9326/ac6228>

predictions of the future are inherently uncertain, including the exploratory and non-probabilistic emission scenarios on which Adura relies to support its conclusion of non significance. This is not a legitimate reason not to consider these sources.

4. Incorrect assumption that new oil and gas is compatible with the remaining 1.5°C carbon budget

Adura repeatedly tries to minimise the significance of Rosebank's contribution to climate change, with statements like: *"production from the Rosebank Development is unlikely to be evident above statistical noise."* (page 51) and *"The Rosebank Development's production will not materially alter global emissions trajectories or the ability to achieve pathway-defined temperature outcomes."* (pp. 59–60)

This ignores the fact that a plethora of sources show that new oil and gas developments are wholly out of step with 1.5°C-aligned remaining global carbon budget forecasts. For example, a 2022 report by the International Institute for Sustainable Development found there is a *"large consensus"* across all published studies that developing new oil and gas fields is *"incompatible"* with the 1.5°C target.¹⁰ As mentioned above, Trout et al. (2022) forecast emissions from existing and under development fossil fuel infrastructure to 936 GtCO₂.¹¹ Adura refuses to meaningfully engage with these sources.

5. Failure to acknowledge that demand for oil and gas in 1.5°C-aligned scenarios can be met by existing and planned developments

Adura repeatedly states that there will still be demand for oil and gas in various scenarios e.g. *"Rosebank production will fit within overall demand required in the NZE scenario, and there is no conclusive evidence that Rosebank would cause the level of supply to exceed that future demand."* (p. 65, footnote 9).

This ignores the fact that science-driven Paris-aligned 1.5°C scenarios indicate that existing and planned supply is sufficient to meet that demand¹². The fact that there will be continued demand for oil and gas, and that Rosebank could contribute to meeting it, is irrelevant. The task here is to assess what impact there would be on the climate if Rosebank, and all planned projects, proceed.

¹⁰ International Institute for Sustainable Development, *Navigating Energy Transitions: Mapping the road to 1.5°C*, 2022.

<https://www.iisd.org/system/files/2022-10/navigating-energy-transitions-mapping-road-to-1.5.pdf>; Greg Muttitt, Fergus Green and Steve Pye, *The Climate Implications of New Oil and Gas Fields in the UK – An overview of the evidence*, UCL, June 2025.

https://www.ucl.ac.uk/policy-lab/sites/policy_lab/files/report-climate_implications_pages_online.pdf

¹¹ Trout et al., 2022.

¹² International Institute for Sustainable Development, *Navigating energy transitions: Mapping the road to 1.5°C*, 2022, <https://www.iisd.org/system/files/2022-10/navigating-energy-transitions-mapping-road-to-1.5.pdf>; Olivier Bois von Kursk and Greg Muttitt, *Lighting the Path: What IPCC energy pathways tell us about Paris-aligned policies and investments*, International Institute for Sustainable Development, 2022, <https://www.iisd.org/publications/report/ipcc-pathways-paris-aligned-policies>; Fergus Green, Olivier Bois von Kursk, Greg Muttitt and Steve Pye, 'No new fossil fuel projects: The norm we need', *Science* 384: 6699, 2024, pp. 954–57; International Energy Agency, *Net Zero by 2050: A Roadmap for the Global Energy Sector*. 2021, <https://www.iea.org/reports/net-zero-by-2050>

In particular Adura misrepresents the IEA's position regarding demand and what this means for new oil and gas developments within its NZE scenario. OPRED said: *"Paragraphs 6.4.13 to 6.4.19 – makes reference to the International Energy Agency (IEA) report 16 but does not address some of its conclusions. The IEA Net Zero scenario requires no new oil and gas projects to meet the future demand. The IEA report also discusses on p14 that there is no room for new fields and p16 discusses that it cannot be left to addressing demand solely to resolve emissions. Please ensure that the IEA report has been fully considered as part of the assessment."* (para. 28)

Adura says it has "noted" this comment and that the conclusions of the IEA report are "fully considered". However, in citing the IEA's *World Energy Outlook 2025* report¹³ Adura goes on to say, *"IEA (2025c) acknowledges that the level of new supply will depend partly on demand and that for the NZE Scenario the investment in existing and approved conventional projects is sufficient to meet demand. However, overall, the report emphasises the importance in maintaining sufficient supply to meet residual demand during the transition, while overall production declines in line with climate targets"*. (page 65)

Adura appears to be implying that the *"importance in maintaining sufficient supply"* trumps the fact that no new long-lead-time oil and gas projects are needed within the NZE Scenario. There is no evidence that this is the case. Indeed, the IEA's report *The Implications of Oil and Gas Field Decline Rates*¹⁴ – published just a few months before the *World Energy Outlook 2025* – reaffirmed this position. Furthermore, it showed that by 2035, production from existing and already approved fields could exceed demand in the NZE pathway by over 15%, meaning that some production would need to be retired early. This is completely at odds with Adura's position that, *"the Rosebank Development is considered to align with the ongoing oil and gas demand and use under the NZE scenario"*. On the contrary, under the NZE, the opening of any new oil or gas fields will mean either that even more operating fields will have to close early, or that it will lead to even more global heating if they are allowed to continue production.

6. Failure to assess the actual effects of greenhouse gas emissions

OPRED told Adura, *"Please ensure that the assessment of likely significant effects, including cumulative effects, covers the requirements of the EIA Regulations as relevant"* (section 15). The Regulations require the assessment of a project's *"effects"* on listed factors including human health, biodiversity, land, soil, water, air and climate and more.¹⁵ The Regulations therefore require an assessment not just of the volume of greenhouse gases a development will generate, but also how those emissions will affect the listed factors. The European Court of Human Rights reinforced this in its October 2025 judgment on the case *Greenpeace Nordic and Others v. Norway*, when it ruled that

¹³ International Energy Agency, *World Energy Outlook 2025*, <https://iea.blob.core.windows.net/assets/9753df19-0a71-422a-b725-012c555763b3/WorldEnergyOutlook2025.pdf>

¹⁴ International Energy Agency, *The Implications of Oil and Gas Field Decline Rates*, 2025 Box 6, page 58: <https://iea.blob.core.windows.net/assets/9ea2076e-5a0d-4a0d-9767-a1eec20aff23/TheImplicationsofOilandGasFieldDeclineRates.pdf>

¹⁵ Schedule 6(4)(f) and 6(5).

approving oil and gas field development without comprehensively assessing the impacts on life and health from all emissions is prohibited under fundamental human rights.¹⁶

Yet Adura refuses to estimate these effects, contradicting OPRED about what is required and selectively quoting from the ISEP guidance to avoid complying with the Regulations and the Supplementary Guidance (see the Uplift, submission, appended, for further examples of Adura cherry-picking the ISEP Supplementary Guidance).

They say: “Guidance e.g. ISEP (2026) does not stipulate the assessment of downstream Scope 3 emissions be assessed against the receptor-based framework set out in Schedule 6(5). The focus of the assessment for downstream Scope 3 emissions is the global atmosphere as the primary receptor ... any indirect implications for other receptors cannot be reliably disaggregated or attributed at the scale of an individual project ... there are significant uncertainties in attributing a defined quantity of emissions from a single project to discrete effects on population and human health, biodiversity, land, water, air quality or receptors listed on Schedule 6(5) (e.g. due to uncertainties in future global emissions trajectories, climate system feedbacks, and natural variability)” (item 15, response B (page 42)).

This is disingenuous. The exercise can and should have been attempted. As described in our 2025 response, the linear relationship between greenhouse gas emissions and increased global average temperatures mean that such impacts can be estimated with confidence¹⁷ and this information 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. See our 2025 response for some examples.¹⁸

Indeed, the exercise of attributing a defined quantity of emissions from a single project to discrete effects has been done for other fossil fuel developments. Scientists writing in *Nature* in 2025 showed how quantifying the additional warming from every additional tonne of CO₂ enables concrete, foreseeable consequences to be identified and evaluated in a formal risk assessment framework. They said: “This approach reveals that major socioeconomic and environmental consequences can be attributed to CO₂ emissions associated with individual fossil fuel projects, contrary to the pervasive unquantified claims of negligible risks by project proponents”.¹⁹ And they used this method to

¹⁶ European Court of Human Rights, *Greenpeace Nordic and Others v. Norway*.
<https://hudoc.echr.coe.int/eng?i=001-245561>

¹⁷ Valérie Masson-Delmotte et al., ‘Summary for Policymakers’, in *Climate Change 2021: The Physical Science Basis, Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*, IPCC, 2021, page 28, para. D.1.1.
https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf; Lamboll, R.D., Nicholls, Z.R.J., Smith, C.J. et al. ‘Assessing the size and uncertainty of remaining carbon budgets’, *Nature Climate Change*, vol. 13, pp. 1360–1367, 2023. <https://doi.org/10.1038/s41558-023-01848-5>

¹⁸ Representation from the Weald Action Group regarding the Rosebank Oilfield Development Project (reference: ES/2022/001), 20 Nov. 2025, see footnote 24,
<https://www.wealdactiongroup.org.uk/wp-content/uploads/2025/11/Weald-Action-Group-Submission-Referece-ES.2022.001.pdf>

¹⁹ Abram, N.J., Maher, N., Perkins-Kirkpatrick, S. et al. ‘Quantifying the regional to global climate impacts of individual fossil fuel projects to inform decision-making’. *npj Climate Action* 4, 92 (2025).
<https://doi.org/10.1038/s44168-025-00296-5>

calculate the effects of a large gas project off Western Australia.²⁰ More recently, Oxfam has calculated the heat deaths that would be attributable to Rosebank and Jackdaw if they were to go ahead.²¹

7. Failure to recognise that 1.5°C and not 2°C is the true global temperature target under the Paris Agreement

Adura persists in treating 2°C as a global temperature goal even though 1.5°C is the true goal of the Paris Agreement. For example, they say: *“The remaining carbon budget is used to estimate the net cumulative amount of CO₂ that can be released to remain under the 1.5 and 2°C global temperature goals of the Paris Agreement.”* (page 2) They also refer to global emissions pathways which would lead to warming beyond the 1.5°C goal, such as the IPCC's C3–C8 scenarios (Tables 13 and 15) and the IEA's STEPS and APS energy scenarios (Table 17). These are irrelevant to this assessment and should not have been included. The 1.5°C goal was confirmed by the Glasgow Climate Pact adopted at the 26th Conference of Parties to the UN Framework Convention on Climate Change (COP26) in 2021²², and by the International Court of Justice's 2025 Advisory Opinion on the Obligations of States in Respect of Climate Change which stated, *“1.5°C has become the scientifically based consensus target under the Paris Agreement”*²³.

8. Failure to acknowledge that all greenhouse gas emissions are significant

Combustion emissions are *always* ‘significant’ effects of fossil fuel projects. Scientists writing in *Nature* in 2025 wrote: *“Every tonne of CO₂ emissions adds to global warming, and every fraction of a degree of additional warming matters.”*²⁴

This fact was also confirmed by the Supreme Court's ruling in our case. Lord Leggatt said: *“It is not disputed that these emissions, which can easily be quantified, will have a significant impact on climate.”*²⁵ Note that this case concerned a much smaller oil development. The total emissions from Horse Hill oil were estimated at 10.6 million tonnes of CO₂eq, compared with Rosebank's estimated at 254 million tonnes. Yet the parties to the case – which included the Secretary of State for Housing, Communities and Local Government – did not dispute that they were significant. And the Planning

²⁰ Sarah Perkins-Kirkpatrick, Andrew King and Nicola Maher, ‘For the first time, we linked a new fossil fuel project to hundreds of deaths. Here's the impact of Woodside's Scarborough gas project’, *The Conversation*, 13 Oct. 2025,

<https://theconversation.com/for-the-first-time-we-linked-a-new-fossil-fuel-project-to-hundreds-of-deaths-here-s-the-impact-of-woodsides-scarborough-gas-project-266060>

²¹ Hamish Morrison, ‘Rosebank and Jackdaw heat deaths “would kill more than population of Inverness”’, *The National*, 10 Aug. 2026,

<https://www.thenational.scot/news/26448996.rosebank-jackdaw-heat-deaths-would-kill-inverness>. Their methodology is explained here: https://scotland.oxfam.org.uk/documents/1138/Methodology_Note_Rosebank_and_Jackdaws_combined_lifetime_carbon_emissions_Final.pdf

²² UNFCCC, Report of the 2021 CoP, Decision 1/CMA.3, Glasgow Climate Pact.

https://unfccc.int/sites/default/files/resource/cma2021_10_add1_adv.pdf, para. 224.

²³ ICJ, Advisory Opinion on the Obligations of States in respect of Climate Change

²⁴ Abram et al., 2025a, p. 7

²⁵ *Finch v Surrey County Council*, para. 7.

Inspectorate said about the proposed coal mine in Cumbria (estimated downstream emissions: 220 MtCO₂eq): *“The information demonstrates that substantial carbon emissions will arise from the end use of the extracted coal. Having regard to this information and relevant IEMA guidance (IEMA Assessing Greenhouse Gas Emissions and Evaluating their Significance. 2nd Edition) it is my opinion that the release of these emissions at this scale and intensity are likely to be significant”*²⁶ Again, this concerned a smaller volume of emissions than Rosebank, and the Planning Inspector’s opinion was accepted by the High Court Judge.

Conclusion

The new information provided by Adura has not addressed the concerns we had about the 2025 Environmental Statement and in several areas they have not supplied the information requested by OPRED. Hence, Adura’s claim that the emissions to be generated by Rosebank are *“not significant”* cannot be supported.

There can be no doubt that if the Rosebank oilfield development goes ahead, it will cause significant harm to the climate system. It is abundantly clear that there is no space in the rapidly dwindling 1.5°C-aligned global carbon budget for any new fossil fuel developments, and a massive excess of emissions from existing oil, gas and coal infrastructure that will now need to close before the end of its economic life. **Any emissions from the Rosebank oilfield would be additional, cumulative and hence contribute to the further exceedance of the global carbon budget.**

The UK government must act with due diligence and refuse this development. To do otherwise ignores the scientific consensus that new fossil fuel projects are incompatible with the 1.5°C target. It would run counter to the government’s objective for the North Sea, *“to take a globally standard setting, 1.5°C and climate science aligned approach to future oil and gas production”*.²⁷ It would undermine the UK’s credibility as an international climate leader, and it may constitute an internationally wrongful act.

In addition to the points raised above, we formally endorse and adopt in full the detailed points made in the consultation response by Uplift, which is appended here, and wish for our submissions to be considered in conjunction with theirs.

Please contact us if you have any questions or would like to discuss any issues raised in this response.

Yours sincerely

Kirsty Clough and Sarah Finch

For Weald Action Group

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²⁶ Planning Inspectorate, quoted in Judgment, *Friends of the Earth and South Lakes Action on Climate Change v Secretary of State for Levelling Up, Housing and Communities and West Cumbria Mining* [2024] EWHC 2349 (Admin), para. 35.

²⁷ Department for Energy Security & Net Zero, *North Sea Future Plan*, 26 November 2025 <https://assets.publishing.service.gov.uk/media/6926dede345e31ab14ecf507/north-sea-future-plan-governments-response.pdf>