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

Dear Sir/Madam,

Ocean Alliance Against Offshore Drilling response to the updated environmental impact assessment and further supporting environmental information for the Rosebank Field Development.

The Ocean Alliance Against Offshore Drilling is a network of over sixty marine and nature NGOs, business and marine groups all united behind calls to end offshore oil and gas drilling in UK seas, to protect marine life and habitats and the communities that rely on thriving seas.

The alliance welcomes the opportunity to respond to the publication of the updated environmental impact assessment and other supporting environmental information for the Rosebank field. Our response focusses on the issues raised in the assessment of the project's scope 3 emissions and the further environmental information submitted by Equinor. It is clear that the project should be refused all further consents. The assessments make clear that the Rosebank oilfield will generate enormous greenhouse gas emissions and cause direct harm to marine ecosystems which already face a myriad of pressures.

The Rosebank field, as well as blowing a hole in the UK's net zero obligations and doing next to nothing for either energy security or energy prices, is already causing significant damage to marine ecosystems, even before full production. It is extremely disappointing in particular to see from the updated information that the gas export pipeline has been constructed through the Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area (MPA), despite this MPA being in unfavourable condition, and that justification for this work is based on evidence from 2014. The Joint Nature Conservation Committee (JNCC) have since surveyed this site and made strong recommendations to protect the MPA from seabed damage from bottom towed fishing gear in 2024, reflecting its sensitivity to disturbance.

Approval of this project would deeply undermine the UK's global and domestic credibility and leadership on tackling the climate and biodiversity crises and signal that the UK Government is prioritising the profits of private oil and gas companies over

the future of the planet and the just transition of communities and workers to a clean and green energy future.

KEY MESSAGES

1. The greenhouse gas emissions are significant, and production would be incompatible with safe climate limits

The Equinor assessment estimates that this project could produce 254 million tonnes of carbon dioxide equivalent ($MtCO_2e$) over its lifetime, including 249 $MtCO_2e$ in downstream scope 3 emissions. This is a significant increase on previous estimates.

It is completely incorrect for Equinor to conclude these emissions are not significant and will not impact on climate change. The claim that the potential emissions would be insignificant if the rest of the world can keep on track with Paris Agreement targets is deeply flawed. There is widespread consensus that the world is not currently on track to achieve Paris Agreement targets. 2024 has been confirmed as the first year when global temperatures exceeded 1.5°C relative to pre-industrial levels, with multiple sources agreeing that surface air temperature reached 1.55°C warming in 2024.[1] In the run up to COP 30 many countries have yet to submit their climate action plans (NDCs). It is the UN's assessment that we have overshot 1.5°C and the Paris targets.[2] The UK also has its own, legally binding emissions targets to meet. Every contribution to warming will therefore make a significant difference, and a large project like this will add to emissions over future decades, taking us beyond 2050.

If the Secretary of State accepts Equinor's conclusion that this project will not have a significant climate impact and approves the oilfield, it would undermine decades of climate action and leadership in the UK. We strongly urge the government to reject this assertion.

2. Equinor have not – and cannot - produce any mitigation measures for the scope 3 emissions climate impact of the project

Equinor conclude that their downstream scope 3 emissions will not have a significant adverse effect on the environment because the impacts of the use of the oil and gas produced is not within their control. Equinor therefore do not think it is necessary to outline any mitigation measures for the scope 3 emissions. However, the requirement to assess scope 3 emissions, as dictated by the UK Supreme Court in the *Finch* ruling,[3] is testament to the fact that oil and gas exploration is indisputably the cause of emissions that do impact the global climate. These emissions are impossible to mitigate due to their scale and the global nature of their impacts. In the case of this consent decision, the only course of action that truly protects the climate, both globally and domestically, is to stop the field from being developed.

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[1] E. Bevacqua, C.-F. Schleussner, J. Zscheischler, 2025. A year above 1.5 °C signals that Earth is most probably within the 20-year period that will reach the Paris Agreement limit, Nat. Clim. Change 15 262–265. https://doi.org/10.1038/s41558-025-02246-9.

[2] J. Watts, W. Xipai, 'Change course now': humanity has missed 1.5C climate target, says UN head, The Guardian (2025). https://www.theguardian.com/environment/2025/oct/28/change-course-now-humanity-has-missed-15c-climate-target-says-un-head (accessed October 28, 2025).

[3] *Finch v Surrey County Council* [2024] UKSC 20 (*Finch*).

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

Very little consideration is given to the effects of climate change on the marine environment. There is a large body of evidence on the impacts of climate change on the UK's marine environment[4,5,6] and on future global impacts as increased greenhouse gas emissions drive rising sea surface temperatures, marine heatwaves, ocean chemistry changes and increasingly unpredictable and extreme weather,[7] all of which are relevant to this updated assessment.

Climate impact and marine environmental damage are not two separate issues; climate change impacts directly on the marine ecosystems being assessed and exacerbates other drivers of degradation. Climate change also reduces the capacity of the marine environment to mitigate and adapt to climate change. These interacting impacts are not explored.

4. The direct impact on the marine environment inside and adjacent to the Rosebank oilfield is significant and should lead to rejection of consent

The revised assessment of the wider environmental impacts concludes (as the original environmental statement did) that the environmental impact of the Rosebank Development 'arising from known and expected activities' is not significant. Yet the wide-ranging impacts of offshore oil, from survey to decommissioning, are well-documented, and should be clear reasons to refuse consent.

There are many ways in which the development could significantly impact on the local and regional marine environment, particularly in combination with climate impacts, including:

- Direct physical damage, degradation, and loss of seabed habitats
- Chronic pollution, including routine use of toxic chemicals and small oil spills.
- Noise pollution and disturbance of marine mammals.

Further details of these marine impacts are covered in Sections 5-9 below.

5. Priority marine habitats including sponge communities, cold water corals and offshore deep-sea muds are at significant risk from this development

[4] Pinnegar, JK, Garrett, A, Wouters, J, Kelly, R, Stiasny, MH, Marshall, CT, Pinnegar, J.K., Garrett, A., Wouters, J., Kelly, R., Stiasny, M.H. & Marshall, C.T. 2023. Climate Change Impacts on Commercial and recreational Fisheries Relevant to the UK and Ireland. MCCIP Science Review 2023., Marine Climate Change Impacts Partnership https://www.mccip.org.uk/sites/default/files/2023-10/Impacts%20on%20Commercial%20and%20Recreational%20Fisheries%20Relevant%20to%20the%20UK%20and%20Ireland.pdf

[5] Fox, C.J., Marshall, C., M.H. Stiasny, Trifonova, N., 2023. Climate Change Impacts on Fish of Relevance to the UK and Ireland. MCCIP Science Review 2023., Marine Climate Change Impacts Partnership https://www.mccip.org.uk/fish

[6] Evans, P.G.H. and Waggitt, J.J. 2020. Impacts of climate change on marine mammals, relevant to the coastal and marine environment around the UK (MCCIP Science Review 2020), Marine Climate Change Impacts Partnership. https://research.bangor.ac.uk/portal/files/37579599/EvansWaggitt_MCCIP1_Publication.pdf

[7] McCarthy, G., Graham, J., Hermanson, L., Hodge, K., Moat, B., Moffa-Sanchez, P., Petit, T., and Robson, J., 2025. Climate change impacts on ocean circulation relevant to the UK and Ireland, MCCIP Ocean Circ. Rev. (2025)

We fundamentally disagree with the continued assertion in the environmental statement that protected MPA and Priority Marine Feature (PMF) features are not at risk from this development.

The project requires a new gas export pipeline to be built through an area of the Faroe-Shetland Sponge Belt MPA which is known to have unique and locally specific sponge aggregations, with two sites with sponge aggregations being found on the pipeline route in Equinor's surveys. This has already been built in the full knowledge that full consent to operate is still outstanding. Sponge aggregations are a Vulnerable Marine Ecosystem (VME)[8] and an OSPAR Threatened and/or Declining Habitat.[9] They are very sensitive to development[10] and can take a long time to recover from impacts.[11] The oilfield site itself includes offshore subtidal sands and gravels and offshore deep-sea muds, both categorised as Scottish PMFs.

Other VME indicator species are found within and adjacent to the Rosebank site, including cup corals, sea pens, soft corals and gorgonians.[12] Coral habitats were recorded in Equinor's surveys within the oilfield site which could qualify as OSPAR priority habitat but a technicality around the definition of a coral garden is used to dismiss their importance.

6. **The impact on the Faroe-Shetland Sponge Belt MPA in particular will be significant and is unacceptable given its unfavourable status**

The IUCN guidelines on MPAs are very clear that no oil and gas development or associated infrastructure is appropriate in an MPA.[13]

Whilst the oilfield itself is not within the Faroe-Shetland Sponge Belt MPA, it is close to the northern boundary and as the new information shows, the pipeline has already been constructed through part of the MPA, travelling through the zone of the MPA now protected from mobile fishing gear and also the zone now protected from mobile and static gear. It is extremely disappointing that this pipeline was allowed to go ahead, through an MPA already regarded as being in unfavourable condition, despite overall consent to operate not having been secured. This in our view represents a material change in the baseline environmental state that undermines the wider conclusions of the assessment.

This additional protection gives the Faroe-Shetland Sponge Belt MPA a relatively high level of protection from bottom towed fishing, allowing the recovery of benthic species and habitats from fishing impacts. However, the impacts from the Rosebank

[8] FAO, Report of the Technical Consultation on International Guidelines for the Management of Deep-sea Fisheries in the High Seas., Food and Agriculture Organisation, Rome, 2009.
[9] OSPAR Commission, List of Threatened and/or Declining Species & Habitats, OSPAR Comm. (2008). https://www.ospar.org/work-areas/bdc/species-habitats/list-of-threatened-declining-species-habitats (accessed October 11, 2022)
[10] Jones DOB, Ian R. Hudson, Brian J. Bett, 2006. Effects of physical disturbance on the cold-water megafaunal communities of the Faroe–Shetland Channel, Mar. Ecol. Prog. Ser. 319 43–54
[11] Jones DOB, Gates AR, Lausen B. 2012. Recovery of deep-water megafaunal assemblages from hydrocarbon drilling disturbance in the Faroe–Shetland Channel, Mar. Ecol. Prog. Ser. 461 71–82
[12] ICES, A suggestive list of deep-water VMEs and their characteristic taxa, ICES, 2020. https://www.ices.dk/data/Documents/VME/VMEs%20and%20their%20taxa.pdf
[13] Day, J., Dudley, N., Hockings, M., Holmes, G., Laffoley, D., Stolton, S., Wells, S., Wenzel, L., eds. 2019. Guidelines for applying the IUCN protected area management categories to marine protected areas., IUCN, Gland, Switzerland

development will add to existing oil and gas infrastructure in the MPA, increasing the multiple impacts on the conservation features and the wider marine ecosystem. Given the welcome investment made in protecting the MPA from fishing impacts, it is counterproductive and undermining to then approve an oil development that will not only directly impact on the MPA, but also exacerbate climate change impacts on marine ecosystems.

In JNCC's advice on that site in relation to fisheries that recommended a full exclusion of bottom towed fishing gear, they note that "As our evidence-base improves, there is potential that we identify further records of deep-sea sponge aggregations in habitat considered suitable for colonisation (namely between the 400–600 metre depth contour in each site)".[14] This is worth noting as the revised environmental statement states that these only occur in a much narrower band at 500m, which dates back to a JNCC report from 2014.

7. **The routine pollution impacts associated with an oilfield of this size will impact on the marine environment and have already started**

The insidious threat of chronic oiling to marine ecosystems in UK waters is well documented.[15] A large oil development of this nature is expected to release many tonnes of oil in chronic oiling and small accidental spills over its lifetime. However, Equinor assessed the likely volume and content of accidental discharges and concluded that the impacts would be insignificant. We do not believe this to be the case, particularly when considering that this additional pollution will add to existing chronic oiling from many other oilfields and the wider pressures of marine pollution in the region, impacting on many elements of the ecosystem. For example, the Faroe-Shetland Channel is important for cetaceans, including fin whale, sei whale, minke whale, humpback whale, sperm whale, northern bottlenose whale, long-finned pilot whale, blue whale, beaked whale and orca. All these species will be susceptible to ingesting or otherwise absorbing small quantities of oil when surfacing or through their food sources, leading to well-documented impacts on individuals and populations.

Furthermore, in addition to the damage caused by the construction of the gas export pipelines, accidental spills and leaks at the Rosebank site have already started. Two separate spills have already been documented in 2025 from vessel operations and other activities, even before major drilling operations have begun.[16]

8. **The risk of a major spill is unacceptable and would cause serious damage to Vulnerable Marine Ecosystems, numerous MPAs and endangered and protected species**

The environmental statement acknowledges that the biggest risk from any offshore development is the potential for a large oil spill. However, the impact of a spill is dismissed because it is assessed as unlikely and a rare event. The worst-case scenario is

[14] JNCC. 2025. JNCC's response concerning proposed fisheries management measures for offshore MPAs in Scotland (October 2024). Available at https://data.jncc.gov.uk/data/9c17e159-8ffd-412e-a849-b3b459e04633/Scottish-fisheries-management-proposals-JNCC-response.pdf (Accessed 3 November 2025)
[15] Oceana in the UK, 2024. Sea Slick: The True Scale And Impact Of Chronic Oil Pollution In UK seas. DOI number: 10.5281/zenodo.13684166
[16] UK Government. 2025. UK Energy Portal, PON1 database notifications 7844 and 7588. Available at https://itportal.energysecurity.gov.uk/irs/publications/pon1 (Accessed 3 November 2025)

a well blow-out which would result in large volumes of oil being released into the environment and impacting on a very wide area of sea and coast. Oil from a blow-out at Rosebank could severely impact on at least 29 protected sites and many iconic conservation species including otters, seals and a wide range of seabirds. Seabirds are particularly vulnerable to oil spills and some seabird populations that would be vulnerable to spills from the Rosebank oilfield operations have already been badly impacted by avian influenza, e.g. the great skua.

9. **The project will impact on blue carbon and the wider capacity for the marine environment to mitigate/adapt to climate change.**

Habitats within the footprint of the proposed development include those of high blue carbon value. MPAs in the vicinity of the proposed oilfield were assessed for their blue carbon potential and were found to be responsible for large quantities of carbon storage and accumulation.[17] However, the impacts of the development on blue carbon have not been specifically assessed. Scottish seabeds represent by far the most important set of habitats for carbon storage in Scotland, and indeed the area covered by the Rosebank field and associated infrastructure represents some of the densest quantities of organic and inorganic blue carbon in Scottish and UK seas.[18]

There are many potential risks to blue carbon habitats from the construction and operation of the site. The impacts of a large oil spill would affect many important marine and coastal blue carbon habitats, but this risk is not assessed. It has been recommended that a precautionary approach should be taken to manage these critical blue carbon habitats.

Conclusion

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

The following organisations and individuals have signed onto this response to the consultation:

Oceana UK

Blue Marine Foundation

British Divers Marine Life Rescue

Chris Packham, broadcaster and environmental campaigner

Community Radio Environment Network

Cornwall Climate Care

Environmental Justice Foundation

[17] M. Burrows, C. Smeaton, H. Tillin, S. Grundy, H. Sugden, P. Moore, C. Fitzsimmons, W.B. Austin, A. O'Dell, 2024. The United Kingdom's Blue Carbon Inventory:: Assessment of Marine Carbon Storage and Sequestration Potential in Scotland (Including Within Marine Protected Areas): A Report to The Wildlife Trusts, WWF and the RSPB., Scottish Association for Marine Science, Oban.
[18] ibid

Grace Blakeley, political economist

Greenhouse Communications

Gripping Films

Hockerton Housing Project

Lizzie Daly, scientist and filmmaker

London Surf / Film Festival

Megan McCubbin, zoologist and wildlife TV presenter

Mother Ocean Blue

Oceanographic Magazine

Open Seas

Pembrokeshire Seal and Marine Research Trust

Professor Sascha Hooker, Deputy Head of School of Biology, University of St Andrews

Project Seagrass

Rewilding Britain

Sir Tim Smit, co-founder of the Eden Project

Stop Rosebank

Sustainable Hockerton

Tom Mustill, biologist and filmmaker

Uplift

Whale and Dolphin Conservation

Wildlife and Countryside Link

Will Works

World Cetacean Alliance

Young Sea Changers Scotland