

Rt Hon Miatta Fahnbulleh
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London
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Dear Secretary of State,

We understand that you are considering whether to grant consent for further development of the Rosebank and Jackdaw oil and gas fields. This letter does not address or endorse those decisions directly but rather outlines the conditions that must be attached to any such development if it is to be reconciled with the United Kingdom's target to achieve net zero emissions by 2050.

All scenarios modelled by the Intergovernmental Panel on Climate Change that limit global warming to 'well below 2°C' project fossil fuel use declining rapidly in the near term but persisting at a very reduced level (in difficult to abate uses only) for many decades. Temperature stabilisation is achieved only once the carbon dioxide still generated by this residual use is captured or removed and committed to geological-timescale storage. Given the mounting pressures already borne by the biosphere, nature-based removals cannot reasonably be relied upon to compensate for continued fossil fuel use.¹ Developing geological storage is therefore a necessary condition for reconciling continued fossil fuel extraction with long-term climate objectives, yet policy has not conventionally linked the licensing of extraction to any corresponding responsibility for disposing safely and securely of the resulting carbon dioxide.

Carbon capture and storage (CCS) and carbon dioxide removal (CDR) are both indispensable to net zero by 2050. CCS is required to address unavoidable industrial process emissions by capturing them at source, such as those from cement production, while CDR addresses emissions that are diffuse or otherwise impossible to capture at source. The UK's Seventh Carbon Budget relies significantly on carbon capture and storage as one of its key delivery routes. Parliamentary scrutiny has flagged this as an area of delivery risk, citing uncertainty over long-term policy signals.²

A storage obligation on licensees would help unlock private capital needed for CCS and CDR at a scale public funding alone is unlikely to match, allowing government to step back from a direct subsidising role sooner. The public funds thereby made available could instead support high-priority investments, such as home insulation and low-carbon energy infrastructure. Additionally, the UK continental shelf has considerably more CO₂ storage capacity than is likely to be needed for domestic requirements,³ indicating an economic opportunity to dispose of European CO₂. A rising obligation would guarantee that storage is developed in time to meet the successive Carbon Budgets set under the Climate Change Act 2008.

The UK is widely recognised as a leader in climate policy. While a decision to award licenses or grant consents for any further oil and gas development would set that leadership back, attaching storage obligations to those licences and consents would offer a way to recover some of that ground by pioneering an innovative policy approach for net-zero-aligned production. The bulk of the path to ending global warming will come from obviating the need for fossil fuels. However, to the extent that fossil fuel use is to continue, it must stop contributing to global warming. Ensuring fossil fuel producers are responsible for carbon dioxide clean-up is a fair and effective way of achieving this – supporting an industry, and a policy framework, capable of enduring long after the North Sea's reserves are finally exhausted.

¹ <https://www.nature.com/articles/s41586-024-08326-8>

² <https://committees.parliament.uk/publications/51956/documents/288307/default/>

³ <https://www.sciencedirect.com/science/article/abs/pii/S1750583621003194?via%3Dihub>

Yours sincerely,



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Signed by 160 members of academia, civil society, and professionals working in environmental services, as individuals and not as representatives of our institutions.

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The views in this letter are attributed to the named authors and do not necessarily reflect those of their wider organisations.