Aberdeen & Grampian Chamber of Commerce

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D/4260/2021: Response to OPRED Consultation – Jackdaw Environmental Statement

Aberdeen & Grampian Chamber of Commerce (AGCC) welcomes the opportunity to respond to the consultation on the environmental information submitted in respect of the Jackdaw development.

As Scotland's largest business membership organisation, AGCC represents more than 1,400 businesses employing 100,000+ people across the North-east of Scotland and beyond. Our membership spans the full energy ecosystem, including oil and gas, offshore wind, carbon capture and storage, hydrogen, professional services, manufacturing, technology and the wider supply chain.

We recognise the importance of robust environmental assessment and support the UK's legally binding commitment to achieving net zero. We also believe that environmental decisions should be made in the context of the UK's continuing energy requirements, recognising both the impacts of domestic production and the consequences of increasing reliance on imported energy.

Our response therefore focuses on the wider environmental, economic and societal considerations that we believe are relevant to OPRED's assessment.

A balanced environmental assessment

The UK will continue to require significant volumes of natural gas for many years as it progresses towards net zero. The question facing policymakers is therefore not whether gas will continue to be consumed, but where that gas will come from.

If domestic production is constrained, demand will instead be met through increased imports. Those imports frequently originate from jurisdictions with higher production emissions and require additional transportation, processing and shipping before reaching UK consumers.

We therefore believe any environmental assessment should consider not only the emissions associated with domestic production, but also the environmental consequences of replacing that production with imported alternatives.

Evidence submitted by the operator indicates that Jackdaw gas would be produced with significantly lower production emissions than imported liquefied natural gas. The Adura-operated portfolio targets production emissions below 10kgCO_2e per barrel of oil equivalent, while Jackdaw gas is estimated to be around 78% less carbon intensive than imported US LNG. Meanwhile, emissions from UK Continental Shelf production have already fallen by 34% since 2018.

These figures demonstrate that where continuing UK gas demand exists, responsibly produced domestic gas can reduce the overall emissions associated with meeting that demand.

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Supporting the UK's energy transition

AGCC strongly supports the transition to a lower-carbon economy. Indeed, our membership includes many of the companies delivering offshore wind, carbon capture, hydrogen, electrification and wider decarbonisation technologies.

However, our research consistently demonstrates that businesses believe the transition will be most successful if it is managed pragmatically rather than through an accelerated decline in domestic energy production.

Our latest Energy Transition Survey found that 93% of respondents agree there remains a future for North Sea oil and gas, provided the UK establishes the right fiscal and regulatory framework.

Respondents also identified consenting complexity, policy uncertainty and delays to project delivery as key barriers to investment.

The survey also highlights that businesses do not see the future as a choice between oil and gas or renewable energy. Rather, they support a balanced transition that maintains energy security and industrial capability while accelerating investment in lower-carbon technologies.

We believe the Jackdaw project is consistent with that balanced approach.

Wider economic and societal considerations

The environmental assessment should also recognise the wider public interest associated with maintaining domestic energy production during the transition.

Jackdaw forms part of a wider package of investment expected to generate £28.7 billion of gross value added to the UK economy, support more than 3,500 jobs during peak construction, sustain around 880 long-term operational roles and create more than 125 apprenticeships.

Together with Rosebank, the projects are expected to generate approximately £1.4 billion in tax revenues during the current Parliament.

Jackdaw also has particular strategic significance because it could provide more than 6% of UK gas production at peak output, equivalent to heating approximately 1.4 million homes, reducing reliance on imported gas during a period of continuing geopolitical uncertainty.

More than £3billion has already been invested in preparing Jackdaw and Rosebank for production, with businesses throughout the UK supply chain committing significant resources over several years. Our own open letter, supported by more than 2,000 businesses, workers and organisations, reflected the widespread view that timely decisions are required to provide certainty for investors, supply chains and communities.

Industry confidence

Our research demonstrates that prolonged uncertainty is itself creating negative consequences. Energy Transition 43 identifies policy uncertainty and consenting complexity among the principal barriers to investment across the energy sector.

Businesses consistently report that they require long-term certainty if they are to continue investing in both existing energy production and emerging transition technologies.

This builds upon the findings of Energy Transition 42, which highlighted declining confidence, investment being diverted overseas and increasing concerns around the long-term competitiveness of the UK Continental Shelf under conditions of continuing uncertainty.

Providing certainty through a timely regulatory decision therefore has significance beyond a single development, reinforcing confidence in the UK's ability to deliver a predictable and credible investment environment.

Conclusion

AGCC believes OPRED's assessment should recognise that the environmental consequences of refusing domestic production cannot be considered in isolation from the UK's continuing demand for natural gas.

Where demand remains, lower-emissions domestic production can reduce the carbon intensity associated with imported alternatives while supporting energy security, investment, employment and the development of the industrial capabilities required to deliver the wider energy transition.

For those reasons, we believe the environmental information supports a positive determination for the Jackdaw development.

Yours sincerely,

Russell Borthwick
Chief Executive