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ES/2022/001: Response to OPRED Consultation – Rosebank 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 Rosebank 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 support the UK's legally binding commitment to achieving net zero and recognise the importance of rigorous environmental assessment. We also believe that such assessments should be grounded in the practical realities of the UK's energy transition, recognising both the environmental impacts of domestic production and the wider consequences of how the UK's continuing energy demand is met.

Our response focuses on the role Rosebank can play in supporting a managed transition that maintains industrial capability, strengthens energy security and enables continued decarbonisation.

Maintaining industrial capability

The UK's transition to a lower-carbon economy will rely heavily on the skills, businesses and supply chains developed through more than five decades of offshore energy production.

The companies designing and operating offshore wind farms, developing carbon capture projects, electrifying offshore infrastructure and deploying new energy technologies are, in many cases, the same engineering businesses, manufacturers, vessel operators and specialist contractors that have been built around the North Sea oil and gas industry.

For that reason, the future of domestic oil and gas production cannot be viewed in isolation from the UK's wider energy ambitions. A successful transition depends not simply on investing in new technologies, but on retaining the industrial capability needed to deliver them.

Our latest Energy Transition Survey demonstrates that businesses overwhelmingly recognise this reality. While companies continue to diversify into offshore wind, carbon capture, hydrogen and other low-carbon sectors, they consistently describe the future as one of evolution rather than replacement.

Indeed, 93% of respondents agree there remains a future for North Sea oil and gas provided the UK establishes the right fiscal and regulatory conditions to support it. Respondents also identify policy uncertainty, consenting complexity and planning delays as barriers slowing investment across both existing and emerging energy sectors.

This reflects a clear consensus from industry that maintaining domestic production and accelerating the energy transition are complementary objectives rather than competing priorities.

Rosebank's contribution extends beyond energy production

Rosebank is frequently discussed in terms of barrels of oil, but it will also deliver 4% of the UK's gas requirement and is vital for the wider industrial capability it supports.

The project forms part of an investment programme expected to generate £28.7 billion of gross value added to the UK economy, support more than 3,500 jobs during construction, sustain around 880 long-term operational roles and generate approximately £1.4 billion in tax revenues during the current Parliament. More than 125 apprenticeships have already been created, helping develop the skilled workforce required across the wider energy sector.

Its economic impact also reaches far beyond North-east Scotland. Rosebank and Jackdaw together support a supply chain involving 171 UK-registered businesses, including 125 based in Scotland and suppliers located across England and Wales. These businesses represent specialist engineering, fabrication, subsea, marine, manufacturing and technology capabilities that underpin not only today's offshore industry but the delivery of future offshore wind, carbon capture and wider energy transition projects.

Maintaining this capability is itself an important public interest consideration. Once specialist skills, engineering expertise and internationally competitive supply chains are lost, they are difficult and costly to rebuild. Preserving them through a managed transition will strengthen the UK's ability to deliver both its climate ambitions and its long-term industrial strategy.

Environmental performance should be considered in context

AGCC believes environmental assessment should reflect the practical reality that UK demand for oil will continue throughout the transition to net zero.

The relevant question is therefore not whether oil will continue to be consumed, but whether that demand is better met through responsibly produced domestic resources or increasingly through imported supplies.

Evidence submitted by the project operator indicates that Rosebank's production emissions are expected to be significantly below the global average. Rosebank is expected to produce oil with an emissions intensity of approximately 12kgCO_2 per barrel of oil equivalent compared with an estimated global average of around 33kgCO_2 per barrel. More broadly, emissions associated with UK Continental Shelf production have fallen by 34% since 2018.

Where continuing demand exists, replacing lower-carbon domestic production with higher-emissions imported alternatives risks increasing the overall emissions associated with meeting UK energy needs while transferring economic activity, employment and tax revenues overseas.

We therefore believe these wider environmental consequences should form part of OPRED's overall assessment.

The importance of regulatory certainty

Our research consistently demonstrates that businesses require long-term policy and regulatory certainty to invest with confidence.

Energy Transition 43 identifies policy uncertainty and consenting complexity among the principal constraints on investment across the energy sector, with respondents highlighting the importance of stable frameworks capable of supporting long-term capital allocation.

These findings build upon Energy Transition 42, which found that investment was increasingly being diverted to international markets offering greater certainty, while businesses expressed growing concern over declining confidence in the UK Continental Shelf and the long-term competitiveness of the basin.

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A timely decision on Rosebank therefore has significance beyond a single project. It will demonstrate that the UK's regulatory system is capable of reaching evidence-based decisions that balance environmental protection with economic resilience, energy security and industrial competitiveness.

That confidence will be important not only for the future of the North Sea but also for attracting investment into the offshore wind, carbon capture and other transition projects that depend upon the same investors, workforce and supply chain.

Conclusion

AGCC believes the environmental assessment of Rosebank should recognise both the environmental performance of the development itself and the wider consequences of the decision being made.

The UK's transition to net zero will require continued domestic oil production for many years while simultaneously accelerating investment in lower-carbon technologies. Maintaining the industrial capability needed to deliver that transition is therefore a matter of strategic national importance.

Rosebank offers an opportunity to meet continuing demand through production with emissions significantly below the global average while supporting jobs, investment, energy security and the highly skilled supply chain upon which the UK's wider energy transition depends.

For those reasons, AGCC believes the environmental information supports a positive determination for the Rosebank development.

Yours sincerely,

Russell Borthwick
Chief Executive