

Christopher Prichard-Gamble
Second Witness Statement
Party: Claimants
Exhibit: CPG2
Date: 14 March 2024
Claim No: QB-2022-001420
Claim No: QB-2022-001241
Claim No: QB-2022-001259

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BETWEEN

SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

Claimant (QB-2022-001259)

SHELL U.K. OIL PRODUCTS LIMITED

Claimant (QB-2022-001420)

SHELL U.K. LIMITED

Claimant: (QB-2022-001241)

- and -

PERSONS UNKNOWN ENTERING OR REMAINING IN OR ON THE BUILDING KNOWN AS SHELL CENTRE TOWER, BELVEDERE ROAD, LONDON ("SHELL CENTRE TOWER") WITHOUT THE CONSENT OF THE CLAIMANT, OR DAMAGING THE BUILDING OR DAMAGING OR BLOCKING THE ENTRANCES TO THE SAID BUILDING

Defendant (QB-2022-001259)

PERSONS UNKNOWN DAMAGING, AND/OR BLOCKING THE USE OF OR ACCESS TO ANY SHELL PETROL STATION IN ENGLAND AND WALES, OR TO ANY EQUIPMENT OR INFRASTRUCTURE UPON IT, BY EXPRESS OR IMPLIED AGREEMENT WITH OTHERS, IN CONNECTION WITH PROTEST CAMPAIGNS WITH THE INTENTION OF DISRUPTING THE SALE OR SUPPLY OF FUEL TO OR FROM THE SAID STATION

Defendant (QB-2022-001420)

PERSONS UNKNOWN ENTERING OR REMAINING AT THE CLAIMANT'S SITE KNOWN AS SHELL HAVEN, STANFORD-LE-HOPE (AND AS FURTHER DEFINED IN THE PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT, OR BLOCKING THE ENTRANCES TO THAT SITE

Defendant (QB-2022-001241)

Second Witness Statement of Christopher Prichard-Gamble

I, Christopher Prichard-Gamble of Shell Centre, York Road, London SE1 7NA **WILL SAY AS FOLLOWS:**

1. **INTRODUCTION**

1.1 I am the Country Security Manager for the Shell group of companies' UK assets, with responsibility for keeping relevant assets in the UK (as well as other locations) secure. Whilst the security of the Shell Haven oil refinery and Shell Centre Tower, Belvedere London are not within my direct line of responsibility, I provide a strategic overview of all of the various threats to the Shell business within the UK, which includes threats posed by activism. The relevant site security teams then implement the appropriate risk mitigation measures at the relevant sites.

1.2 I am employed by Shell International Limited ("**SIL**"), which is within the same group of companies as the Claimants in the subject proceedings, being:

1.2.1 the proceedings with Claim Number QB-2022-001259 - which relate to Shell Centre Tower, Belvedere Road, London ("**the Shell Centre Tower Proceedings**") - in which Shell International Petroleum Company Limited ("**SIPC**") is the Claimant;

1.2.2 the proceedings with Claim Number QB-2022-001420 - which relate to Shell petrol stations in England and Wales ("**the Shell Petrol Stations Proceedings**") - in which Shell U.K. Oil Products Limited is the Claimant ("**SUKOP**"); and

1.2.3 the proceedings with Claim Number QB-2022-001241 which relate to the oil refinery known as Shell Haven, Stanford Le-Hope the Manorway, Stanford Le-Hope ("**the Shell Haven Proceedings**") - in which Shell U.K. Limited is the Claimant ("**Shell UK**").

(SIPC, SUKOP and Shell UK together being "**the Claimants**") and the Shell Centre Tower Proceedings, Shell Petrol Stations Proceedings and Shell Haven Proceedings together being "**the Proceedings**")

1.3 In these Proceedings, I have previously given a witness statement dated 30 March 2023 (my "**First Witness Statement**").

1.4 Unless I state otherwise, the facts in this statement are within my knowledge and true. Where the facts are not within my knowledge, they are true to the best of my knowledge and belief, and I identify the source of my knowledge.

1.5 References to page numbers in this statement are to page numbers in **Exhibit CPG2**.

1.6 I am duly authorised to make this statement on behalf of each of the Claimants.

2. **PURPOSE OF THIS WITNESS STATEMENT**

2.1 This witness statement is intended to address the following:

- 2.1.1 to update the Court as to the current position in relation to direct-action protest activity at each of the sites subject to the Proceedings;
- 2.1.2 to update the Court as to targeted protestor activity against the wider Shell group companies and business and protestor activity against the energy sector generally;
- 2.1.3 to set out the harm caused to the Claimants by virtue of the protest activity; and
- 2.1.4 to explain why the Claimants believe that further direct-action protest activity at or in the vicinity of the Shell Sites could cause irreparable damage to the Claimants and third parties, unless restrained by further injunction.

2.2 This statement is made in support of the Claimants' application for directions for trial and for the continuation of the injunction orders made by Hill J and each dated 23 May 2023 (and each as amended), as follows:

- 2.2.1 in respect of the Shell Centre Tower Proceedings ("**the Shell Centre Tower Injunction Order**") – this injunction is due to expire at 23:59 on 12 May 2024;
- 2.2.2 in respect of the Shell Petrol Stations Proceedings ("**the Shell Petrol Stations Injunction Order**") – this injunction is due to expire at 23:59 on 12 May 2024; and
- 2.2.3 in respect of the Shell Haven Proceedings ("**the Shell Haven Injunction Order**") – this injunction is due to expire at 23:59 on 12 May 2024.

(the Shell Centre Tower Injunction Order, the Shell Petrol Stations Injunction Order and the Shell Haven Injunction Order together being "**the Injunction Orders**").

2.3 Before turning to the evidence, I would like to reiterate a point I made at the outset of my First Witness Statement and which remains important; the Claimants have no wish to stop protestors from undertaking peaceful protests whether near the Shell Sites or otherwise. The Claimants' concern is to mitigate the serious health, safety and wellbeing risks (to the Claimants' employees, contractors, visitors and indeed protestors themselves) posed by the kind of unlawful actions and activities which prompted the Claimants to seek injunctive relief back in April 2022 and the Orders have been carefully considered and drawn so as to ensure that they are not too wide and only prohibit activity which would be clearly unlawful. For example, in relation to Haven and Tower, the order does not seek to prevent protest

on public land. In relation to the Petrol Stations, the order does not seek to prohibit protestors from entering the Petrol Stations. Rather, it seeks to control what they do within the Petrol Stations by prohibiting a campaign of protests which is intended to harm the Claimant and results in serious health and safety concerns. Fortunately, the Injunction Orders appear to be achieving their purpose in acting as an effective deterrent against that sort of unlawful protest activity. As I will explain protest activity, although extensive, has been self-described by protestors as non-violent direct action and therefore has not breached the terms of the Injunction Orders (at least as regards the Claimants' properties).

2.4 That said, the level of protestor activity both at Shell Sites (as defined below), as against the oil/gas industry and organisations connection to the use of (and funding towards the use of) fossil fuels generally, demonstrates to me that the Claimants, the Shell Sites (as defined below) and the wider business of Shell remain a key target for activity.

2.5 Additionally, given campaigners have not provided confirmation or assurances that they will no longer target the Claimants by engaging in unlawful activity, it is clear to me that there is still a very real risk that without the protection of the Injunction Orders, protest activity would very likely return to the levels of unlawful activity previously experienced. Indeed, the ongoing demonstrations referred to below and the statements of intent (paragraphs 7.3.2- 7.3.6 below) clearly demonstrate that the Defendants have not abandoned their cause and intend to continue the protest activity for the foreseeable future. Indeed it is notable that very recently on 3 March 2024, Just Stop Oil released a press statement outlining their plans for 2024 confirming that nonviolent civil resistance will continue (as set out in more detail at paragraph 7.3.6). Therefore, from my perspective, the Injunction Orders remain necessary to mitigate the serious health, safety and wellbeing risks to the Claimants' employees, contractors and visitors (and indeed the protestors themselves) which unlawful actions at the Shell Sites present.

3. **BACKGROUND**

3.1 The sites which are subject to the Injunction Orders, comprise:

3.1.1 Shell Centre Tower, Belvedere Road, London ("**Shell Centre Tower**");

3.1.2 Shell Petrol Stations in England and Wales ("**the Shell Petrol Stations**"); and

3.1.3 Shell Haven, Stanford Le-Hope, Manor Way "**Shell Haven**"),

3.1.4 (Shell Centre Tower, the Shell Petrol Stations and Shell Haven together being "**the Shell Sites**");

3.2 All of these Shell Sites have on-going operational significance for the Claimants' business. They are all integral to the Claimants' operations, supply chain and consumer network - and the points I set out more fully in paragraph 5 of my First Witness Statement remain pertinent in that regard. For that reason too, they remain an attractive target for protestors.

In particular:

Shell Centre Tower

- 3.3 Shell Centre Tower remains Shell's global headquarters. It forms part of Shell Centre and fronts onto Belvedere Road, which in turn fronts onto Jubilee Gardens and overlooks the River Thames. It is made up of 25 floors and has a total office area of 41,875 sqm. There are also 2 levels underground.
- 3.4 There remains around 5,000 individuals registered to the Shell Centre from the Shell group of companies (i.e. Shell employees) globally (although my understanding is that the building's capacity remains at around 3,000). The daily number of staff, contractors and visitors at Shell Centre Tower varies on a day-to-day basis, but on average is between 1,500-2,500. Further details regarding Shell Centre Tower and the protestor activity leading up to the grant of the Injunction Orders is set out in Keith Garwood's witness statements dated 14 April 2022, 22 April 2022 and 30 March 2023.
- 3.5 The key concerns arising from the protest activities which are prohibited by the Shell Centre Tower Injunction Order are summarised at [17] of Hill J's judgment by reference to Keith Garwood's statement, where she says "*Mr Garwood expressed his concerns that protestors would continue to enter, vandalise or damage the Tower, intimidate staff/visitors and block the entrances and exits to the Tower. The latter was a health and safety risk, in particular, because it restricted access for emergency vehicles and sometimes meant that members of the public had to walk on the road*"

Shell Petrol Stations

- 3.6 Shell remains the world's largest single branded retailer serving approximately 25 million customers per day (approximately 400 million litres of fuel) and provides fuels to a variety of markets. There are currently approximately 1,083 Shell Petrol Stations in total across England and Wales. Further details relating to the Shell Petrol Stations and the protestor activity leading up to the Injunction Orders are set out in Ben Austin's witness statements dated 3 May 2022, 10 May 2022, 30 March 2023 and 14 March 2024.
- 3.7 The nature of the protests are summarised in the judgment of Hill J at [18] (by reference to the judgment of Johnson J). In short, entrances to forecourts were blocked, the display screens of fuel pumps were smashed with hammers and obscured with spray paint, kiosks were sabotaged to stop the flow of petrol, protestors glued themselves to the floor, a fuel pump, the roof of a fuel tanker or each other and fuel pumps were damaged to the extent that they were not safe for use and the whole forecourt had to be closed. In his judgment at [9] Johnson J noted that the Defendants were "*committed to protesting in ways that are unlawful, short of physical violence to the person*". He observed that their websites demonstrate this, with references to "*civil disobedience*", "*direct action*", and a willingness to risk "*arrest*" and "*jail time*".

Shell Haven

- 3.8 Shell Haven remains a critical terminal from which Shell UK picks up products and distributes them between over thirty other terminals. It is unique in that its only purpose is the import and distribution of aviation fuel.
- 3.9 Multiple airports are serviced by Shell Haven via direct pipelines, such as Heathrow and Gatwick and Stansted. The aviation fuel is otherwise distributed by road and by pipeline, with the main United Kingdom Oil pipeline running to Stanlow Refinery in the North-West. Further details relating to Shell Haven and the protestor activity leading up to the Injunction Orders are set out in Stephen Brown's witness statements dated 13 April 2022 and 22 April 2022 and Fay Lashbrook's witness statement dated 30 March 2023.
- 3.10 In short, the main concerns (which remain and which are summarised in the judgment of Hill J at [14]) related to the fact that the Haven site is used for the storage and distribution of highly flammable hazardous products. If unauthorised access is gained, this could lead to a leak causing a fire or explosion and very significant danger. Unauthorised access to the jetty creates an additional risk of damage which could lead to significant release of hydrocarbons into the Thames Estuary. There are concerns over the personal safety of staff/contractors and the protestors themselves (who had, for example, climbed on to moving vehicles) as well as the security of energy supply and Shell's assets.
- 3.11 The judgment of Hill J at [36]-[40] refers to the witness evidence as to the risk of future harm:

"36. The Claimants liaise regularly with the police whose intelligence indicates that there continues to be an ongoing threat; that the protest campaign is not over; and that protest groups will continue to attempt to put pressure on the government to halt new investment in fossil fuels. It is apparent that JSO continues to have the ability to draw on a large group of protestors who are willing to be arrested; that they take action using a variety of tactics and target locations across the UK; and that they employ tactics that attract the media and public interest. Further there is a high level of crossover between the individual protest groups, who appear to share disruptive tactics between them. His view was that activities of the sort described above would be likely to increase as a result of the government's recent approval of the building of a new power station, the cost-of-living crisis and the likely increase in support for JSO given that environmental concerns affect the majority of the public.

37. There is the following specific evidence of the likelihood of continuing action against the Claimants and the wider Shell business: (i) a 30 November 2022 report that JSO had stated they will "continue to escalate unless the government meets our demand to stop future gas and oil projects"; (ii) an 11 January 2023 report that JSO had said that they planned more large-scale disruption this year; (iii) a 29 January 2023 Twitter post from Fossil Free London inviting people to a meeting on the basis

that "in the last year, we've closed down Shell's AGM, challenged their legal director, sabotaged their CEO's leaving party & more! Now we want to go bigger"; and (iv) JSO's 14 February 2023 "ultimatum letter" issued to 10 Downing Street which stated that unless the UK government provided an assurance that it would immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK by 10 April 2023, they would be forced to escalate their campaign.

38. Further, during the hearing Ms Stacey took me to press coverage dated 26 April 2023 indicating that following a four-day demonstration XR and other groups said that it would step up campaigns to force the government to tackle the climate emergency. The co-founder of XR was quoted as saying that the government had a week to respond to the group's demands.

39. Mr Prichard-Gamble's overall view was that (i) the incidents described demonstrate a clear nationwide targeting of members of the wider Shell group of companies and its business operations since April/May 2022; (ii) such demonstrations will continue for the foreseeable future; and (iii) the injunctions need to be extended as they provide a strong deterrent effect and mitigate against the risk of harm which unlawful activities at the sites would otherwise give rise to. Unlawful activity at the sites presents an unacceptable risk of continuing and significant danger to the health and safety of staff, contractors, the general public and other persons visiting them.

40. He emphasised that the Claimants do not wish to stop protestors from undertaking peaceful protests whether near their sites or otherwise. Many such peaceful protests have in fact taken place without breaching the injunctions, in particular outside and in the vicinity of the Tower and outside of Shell petrol stations.

3.12 In relation to all three Claims, Hill J remained satisfied that unless restrained by injunctions the Defendants would continue to act in breach of the Claimants' rights and that that there continued to be a real and imminent risk of future harm and that the harm which might eventuate was sufficiently "*grave and irreparable*" that damages would not be an adequate remedy: see e.g. [146], [147].

3.13 **Background to the Injunction Orders**

3.14 I set out the background to the Claimants' previous injunction applications in these proceedings in my First Witness Statement. That background remains relevant context for the application the Claimants make now. In particular:

3.14.1 Details as to the incidents which led up to the original injunctions being granted is set out at paragraphs 3.1 to 3.4 of my First Witness Statement.

3.14.2 The procedural background to the Injunction Orders is then set out in my First Witness Statement at paragraph 4.1.

3.14.3 The injunctions were renewed at a hearing which took place on 25 and 26 April 2023 (the "**April Renewal Hearing**") and the incidents which occurred between the original grant of the injunctions in 2022 and prior to the April Renewal Hearing (and which the court considered when it made the Injunction Orders) are set out in my First Witness Statement at paragraphs 6.1 to 6.10.

4. **INCIDENTS OF DIRECT-ACTION PROTEST AGAINST THE CLAIMANTS AND THE WIDER SHELL BUSINESS SINCE THE APRIL RENEWAL HEARING**

4.1 The Claimants' solicitors, Eversheds Sutherland (International) LLP, have prepared a chronology detailing the incidents which they have been able to identify of instances since the April Renewal Hearing of direct-action protest against the Claimants, the wider Shell business and the wider oil/gas industry and operators within it (including organisations connection to the use of (and funding towards the use of) fossil fuels generally). A copy of this chronology is exhibited at pages 3- 44 of **Exhibit CPG2** ("**the Chronology**").

4.2 It will be evident from those chronologies that:

4.2.1 as far as I am aware, there have not been any incidents of unlawful breach of the Injunction Orders at any of the locations covered by the current injunctions (subject to my comment at paragraph 4.5.2 below); however

4.2.2 protests have regularly occurred outside the Claimants' premises, most often Shell Centre Tower, with significant numbers of protestors being present (to which I refer further below). One recent trend involves protestors targeting Shell senior executives. For example, on 1 February 2024 Greenpeace protesters dressed up as senior executives and staged a "party" outside of Shell Centre Tower, celebrating Shell's "outrageous profits", pages 673 - 675 of **Exhibit CPG2** and on 22 February 2024, Greenpeace released a video superimposing the face of Shell's CEO, Wael Sawan, onto an image highlighting Shell's profits (along with senior executives from Equinor, BP, Chevron, Exxon and Total. See page 718 of **Exhibit CPG2**.

4.2.3 Protestor activity targeting the wider oil and gas industry and the use of fossil fuels generally is far from reaching a conclusion. Protestor activity - unlawful as well as lawful - targeting the wider Shell business and the wider oil/gas industry and key stakeholders within it continues unabated. For instance, in 2023, high-profile sports events and popular art galleries and museums appeared to be the focus of protestor groups in order to attract as much attention as possible.

4.3 In those circumstances I believe the Injunction Orders are currently having their desired effect in acting as a deterrent against unlawful protestor activity. That belief is also

supported by comments made by Just Stop Oil on Twitter (now "X") on 9 June 2023 which stated "*Do you know what happens if you protest outside oil refineries now? Oil companies have bought injunctions to ban people from taking action at refineries, distribution hubs, even petrol stations. Punishments for breaking injunctions range from unlimited fines to imprisonments*". Page 127 of **Exhibit CPG2**

4.4 Given all this extreme (and unlawful) protest activity (which I explained further below), which continues to be encouraged by protestor groups, I am concerned that without the protection of the Injunction Orders such unlawful activity would return to the Shell Sites. Shell Sites are firmly within the category of sites which are at risk and it is impossible for the Claimants to know in advance which of its particular sites might be targeted.

4.5 **Protestor activity at Shell Sites since the April Renewal Hearing**

4.5.1 It is evident that Shell Centre Tower remains an attractive target for protestor activity against Shell and the wider Shell business.

4.5.2 I am aware that there has been a total of 63 separate protest incidents at Shell Centre Tower since the April Renewal Hearing. Fortunately, the incidents have all been non-violent direct action although it should be noted that there have been at least three instances (on 12 June 2023, 15 June 2023 and on 19 June 2023) where protestors accessed the entrances to Shell Centre Tower and, on one of these occasions (15 June 2023) protestors also attempted to gain access to the remainder of the building. Thankfully, protestors were not able to make their way into the remainder of the building on these occasions.

4.5.3 The number of protestors in attendance is generally around 15-20 people, although I am aware that there is one individual protestor that has (so far, peacefully) protested at Shell Centre Tower on approximately 27 separate occasions since 20 September 2023.

4.5.4 I am also aware of one protest by Extinction Rebellion Oxford at a Shell Petrol Station in Headington. The protest was lawful, with protestors remaining outside of the filling station. Pages 370 - 373 of **Exhibit CPG2**

4.5.5 The Shell Annual General Meeting held on 23 May 2023 was heavily disrupted by protestors resulting in the meeting being delayed for over an hour whilst 67 protestors (affiliated with a number of groups including Extinction Rebellion, Fossil Free London and Christian Climate Action) were removed. Pages 67 - 69 of **Exhibit CPG2**

4.6 **Protestor activity against Shell's wider business, the oil and gas industry, the use and funding of the use of fossil fuels and other key stakeholders**

- 4.7 In addition to direct action against Shell at the Shell Sites, protestors often target the wider oil and gas industry and key stakeholders within it as well as protesting against organisations viewed to have connections to the use of (and funding towards the use of) fossil fuels.
- 4.8 According to Suella Braverman, Secretary of State for the Home Department at the time, during May and June 2023 Just Stop Oil carried out *"156 slow marches around London. That has required more than 13,770 police officer shifts. That is more than 13,000 police shifts that could have been spent stopping robbery, violent crime or antisocial behaviour, and the cost to the taxpayer is an outrage, with £4.5 million spent in just six weeks, on top of the £14 million spent last year."* A copy of the Hansard Extract can be found at 134 **Exhibit CPG2**.
- 4.9 These "slow marches" included blocking the A4 Hammersmith Flyover on 31 May 2023, and further slow marches on 26 June 2023 which impacted on access to King's College Hospital. Pages 79 – 83 and 156 - 159 of **Exhibit CPG2**
- 4.10 Other incidents that I am aware of include:
- 4.10.1 10 May 2023 - climate protestors gathered outside Equinor's London offices to oppose plans to develop the Rosebank oil and gas field located in the Shetland Islands. Pages 48 – 49 of **Exhibit CPG2**
- 4.10.2 11 May 2023 - protestors targeted the British Insurance Brokers' Association conference in Manchester, calling for insurers to refuse to back the East African Crude Oil Pipeline (which is a planned export project to transport oil from Uganda to Tanzania). Pages 50 - 51 of **Exhibit CPG2**
- 4.10.3 4 June 2023 - Extinction Rebellion protestors attended Essence Mediacom's office (a media planning organisation) to urge the agency not to re-pitch for the Shell media account, holding signs that read *"Don't do Shell's dirty work"*. Pages 107 - 108 of **Exhibit CPG2**
- 4.10.4 7 June 2023 - approximately 20 Extinction Rebellion protestors attended EICC to protest at the Pensions and Lifetime Savings Association Conference, sponsored by BlackRock, seemingly to protest *"against pension funds investing in fossil fuels, with the group of protestors singling out Blackrock in particular"*. Pages of 109 - 113 **Exhibit CPG2**
- 4.10.5 8 June 2023- "Ocean Rebellion" staged a stunt in which one protestor dressed up as the Prime Minister, Rishi Sunak and poured "oil" on another protestor dressed up as a gannet. The protest was in response to Equinor's application to develop the Rosebank oil field. Pages 114 - 116 of **Exhibit CPG2**

- 4.10.6 9 June 2023 -Extinction Rebellion protestors glued themselves to the front door of SLB Cambridge Centre, demanding that Cambridge University cuts ties with SLB which develops technology for fossil fuel companies such as Shell and BP. Pages 121 - 123 of **Exhibit CPG2**
- 4.10.7 10 June 2023- Activists took to beaches across Scotland to protest at the planned development of the Rosebank oil and gas field, leaving messages in the sand, partaking in a beach clean and setting out on boats, kayaks and paddleboards to highlight their concerns the plans could have on local marine life. Pages 128 - 132 of **Exhibit CPG2**
- 4.10.8 11 June 2023 - It was reported that protestors would march to Poole Quay, calling for oil company Perenco to lose its licence following an oil spill in Poole Harbour. Page 133 of **Exhibit CPG2**
- 4.10.9 20 June 2023 - Activists protested outside the UAE Embassy against the decision to hold the Cop28 climate conference in the United Arab Emirates, citing the UAE's contribution to the climate crisis as one of the reasons for the protest. Pages 144 - 146 of **Exhibit CPG2**
- 4.10.10 21 – 25 June 2023 - A "Hell" bus and petrol station were erected at the Glastonbury festival. Pages 147 - 155 of **Exhibit CPG2**
- 4.10.11 1 July 2023 - JSO published a list of demands to organisers of London Pride and threatened disruption if their demands were not met. JSO activists later blocked a London Pride parade by sitting in front of a Coca-Cola truck, citing sponsorship from "high-polluting industries" as their reasoning. Pages 163 - 166 of **Exhibit CPG2**
- 4.10.12 3 July 2023 - Extinction Rebellion protest outside the offices of Wood Group in Aberdeen and Surrey as a result of their connection to the oil and gas sector. They let off flares and sprayed fake oil across the entrance of the Surrey based office. Pages 172 – 174 of **Exhibit CPG2**
- 4.10.13 6 July 2023 - Four Extinction Rebellion activists were reportedly arrested after chaining themselves to a pink boat and blocked the entrance of an opencast coal mine in Merthyr Tydfil, claiming that the mine is continuing to operate illegally as a result of planning permission running out. Pages 179 - 181 of **Exhibit CPG2**
- 4.10.14 13 July 2023 - Fossil Free London protestors staged a sit-in at the offices of the UK Government Department for Energy Security and Net Zero in protest of the Rosebank oil field. Pages 198 - 200 of **Exhibit CPG2**

- 4.10.15 15 July 2023 - Climate Camp Scotland, climbed onto a building inside an Ineos plant which powers the Grangemouth refinery in Scotland. Pages 206 - 211 of **Exhibit CPG2**
- 4.10.16 20 July 2023 - Just Stop Oil activists threw orange paint at Policy Exchange's HQ, with protestors claiming Policy Exchange had received funding from ExxonMobil prior to recommending restrictions on climate protests. Pages 219 - 221 of **Exhibit CPG2**
- 4.10.17 23 July 2023 - climate activists from "This Is Rigged" climbed up a 100ft Kelpie statue in Falkirk, following a week of action outside oil terminals in Grangemouth and Cydebank. The group are calling upon the Scottish Government to oppose new fossil fuel projects. Pages 225 - 226 of **Exhibit CPG2**
- 4.10.18 28 July 2023 - Extinction Rebellion members staged a "mediation" protest at Barclays Bank in Yeovil, calling on Barclays to "*divest away from investment in fossil fuels and to transition to renewable energy investments*". Pages 237 - 240 of **Exhibit CPG2**
- 4.10.19 1 August 2023 - red paint was thrown over the entrance to the Scottish Parliament in response to new North Sea oil licences being granted. Members of JSO also marched through the centre of Cambridge in protest of the UK Government's licencing of 100 new oil and gas fields in the North Sea. Pages 241 - 243 of **Exhibit CPG2**
- 4.10.20 3 August 2023 - Greenpeace protestors targeted the Prime Minister's family home by climbing on top and draping a large sheet of black cloth over its façade, in protest of the oil drilling expansion. Pages 247 - 250 of **Exhibit CPG2**
- 4.10.21 8 August 2023 - Fossil Free London gathered outside of Shell Centre Tower displaying posters featuring Shell's CEO, Wael Sawan, along with the message "*this Ken is a climate criminal*". Shell's CFO, Sinead Gorman, was also targeted by this campaign. They also handed out leaflets with the message "*5 signs you work at a toxic company*". Pages 260 of **Exhibit CPG2**
- 4.10.22 1 September 2023 - Extinction Rebellion activists gathered outside Perenco's HQ in London, demanding that the oil and gas company does not expand further in the Democratic Republic of Congo. Pages 306 - 307 of **Exhibit CPG2**
- 4.10.23 4 September 2023 - activists staged a protest outside of Barclays bank while dressed as The Spice Girls, 'corporate-rats' and Jacob Rees-Mogg with one protestor claiming "*Barclays invests billions and billions of pounds to make profits from fossil fuels*". Pages 308 - 312 of **Exhibit CPG2**

- 4.10.24 15 September 2023 - a group of protestors in Bradford gathered at the West Yorkshire Pension Fund, urging the insurance fund to “*cut off investments in Shell and BP*”. Campaigners also protested outside Chubb Insurance offices in Manchester calling on the company to commit to not insuring the East African Crude Oil Pipeline. Pages 318 - 320 of **Exhibit CPG2**
- 4.10.25 18 September 2023 - Extinction Rebellion activists poured fake oil over the steps of the Labour party’s headquarters to protest against the party’s position on oil and gas licences. Two activists climbed onto the Labour head office in Southwark, south London, and set off smoke grenade canisters. Another activist chained himself to a handrail to demand Labour cancel new fossil fuel licences and fund the transition to renewables. Pages 332 - 334 of **Exhibit CPG2**
- 4.10.26 21 September 2023 - JSO gathered outside North Warwickshire Borough Council offices, claiming the Council had wasted public money on obtaining an injunction to prevent JSO protests outside the Kingsbury Oil Terminal. JSO later disrupted the Council’s meeting in protest over the Kingsbury oil terminal injunction on 29 September 2023. Pages 336 - 338 of **Exhibit CPG2**
- 4.10.27 28 September 2023 - Just Stop oil held a demonstration in Portsmouth city centre and blocked traffic in response to the UK government’s refusal to “stop licensing all new oil, gas and coal projects”. Pages 364 - 365 of **Exhibit CPG2**
- 4.10.28 8 October 2023 - activists staged a demonstration outside Barclays bank in York, criticising the bank for financing the Rosebank oil and gas field in the North Sea, by covering themselves in black liquid and sitting underneath the Barclay’s sign. Pages 389 - 391 of **Exhibit CPG2**
- 4.10.29 9 – 11 October 2023 - protestors targeted a number of Universities, by spraying paint across University buildings and climbing upon glass facades, calling upon Universities to cut ties with Barclays bank and fossil fuel companies. Pages 392 - 405 of **Exhibit CPG2**
- 4.10.30 14 October 2023 - Extinction Rebellion staged a protest around the perimeter of Gatwick Airport in protest of plans to expand the airport runway. Pages 424 - 426 of **Exhibit CPG2**
- 4.10.31 18 October 2023 - Extinction Rebellion protestors occupied the offices of ten City of London insurance companies, calling upon them to stop insuring West Cumbria Coalmine and East Africa Crude Oil Pipeline. Pages 440 - 441 of **Exhibit CPG2**
- 4.10.32 4 November 2023 - Extinction Rebellion activists blocked the entrance to Farnborough Airport and released smoke flares, in protest of its proposed expansion. Pages 497 - 498 of **Exhibit CPG2**

- 4.10.33 10 November 2023 - Extinction Rebellion occupy the offices of the Daily Telegraph to protest "about their campaign of lies and disinformation aimed at stopping urgent action to tackle the accelerating climate crises" Pages 508 - 510 of **Exhibit CPG2**
- 4.10.34 13 November 2023 - Fossil Free London activists, joined by Greta Thunberg, staged a protest outside Guildhall in the City of London to disrupt Rishi Sunak's speech inside the Lord Mayor's banquet. Pages 527 - 531 of **Exhibit CPG2**.
- 4.10.35 14 November 2023 - Fossil Free London activists disrupted an energy conference held at the Hilton Hotel in Tower Bridge, in protest against oil and gas drilling at Rosebank. Pages 531a - 531h of **Exhibit CPG2**. On the same day, Just Stop Oil march from Kennington Park Road at the Oval to north Kennington. Police warn that resources are becoming strained. 23 arrests were made. Pages 532 - 534 of **Exhibit CPG2**
- 4.10.36 15 November 2023 - 66 Just Stop Oil protesters march down Cromwell Road. By 11.50am all protesters were arrested by the police, according to Just Stop Oil. Pages 536 - 538 of **Exhibit CPG2**
- 4.10.37 19 November 2023 - members of Extinction Rebellion rallied outside British Cycling's annual general meeting in protest of its partnership with Shell. Pages 545 -548 of **Exhibit CPG2**
- 4.10.38 20 November 2023 - Activists from Fossil Free London blocked the doors to the headquarters of BP. Approximately 70 activists blocked both entrances to BP's office near Piccadilly Circus. Further activists held signs reading "stop fuelling genocide". Pages 549 - 554 of **Exhibit CPG2**
- 4.10.39 20 November 2023 - Just Stop Oil began their slow march from Trafalgar Square and headed towards Parliament Square holding banners in protest of the government's recent fossil fuel licensing. Pages 555 - 556 of **Exhibit CPG2**
- 4.10.40 30 November 2023 - A demonstration by Just Stop Oil protesters was held outside the Prime Minister's London home calling for a halt on fossil fuel exploration in the UK. The protest group said about 18 supporters gathered outside Rishi Sunak's home beating pots and pans while carrying placards stating: "COP Failure=Crop Failure", "No rest for the Wicked" and "Arrest the Real Criminals". Pages 560 - 562 of **Exhibit CPG2**
- 4.10.41 30 November 2023 - Fossil Free London held a silent demonstration outside the headquarters of Barclays in protest of Barclays' investments. Pages 563 - 567 of **Exhibit CPG2**

- 4.10.42 30 November 2023 - Christian Climate Action interrupted a service at Chichester Cathedral to "hold signs" and "sing a plainsong penitential chant" over the diocese's decision to invest in fossil fuel giants Shell and BP. Pages 568 - 570 of **Exhibit CPG2**
- 4.10.43 1-2 December 2023 - Campaign groups Fuel Poverty Action, Unite Community, and their allies held nationwide protests carrying out 'Warm Ups' to demand action on fuel poverty. People occupied British Gas offices, protested outside Scottish Power, and engaged their local communities. Groups organised over 30 events as far afield as Southend-on-Sea, Portsmouth, Gateshead, and the Isle of Arran. Pages 572 - 576 of **Exhibit CPG2**
- 4.10.44 2 December 2023 - Oxford Extinction Rebellion group protested in Oxford by dressing up as fossil fuel executives and pouring oil over others, "representing all of us who will be affected by climate change". Pages 580 - 582 of **Exhibit CPG2**
- 4.10.45 6 December 2023 - Activists from Fossil Free London assembled outside BP's London headquarters to protest Israel's approval of 12 new licences for natural gas exploration off the west coast of Gaza to six companies, including BP. Pages 594 - 597 of **Exhibit CPG2**
- 4.10.46 9 December 2023 - Protesters from Extinction Rebellion and other campaign groups joined a demonstration outside BP offices in London as part of a "global day of action" calling for countries to tackle climate change and following Israel's grant for licence for BP to explore a gas field in the Mediterranean, close to the Tamar field and about 50 miles offshore. Page 608 of **Exhibit CPG2**
- 4.10.47 9 December 2023 - Protestors formed a group outside Jubilee Gardens with strong lights shining a message on Shell Centre Tower which reads Fossil Free COP. On the same day, Extinction Rebellion also called for marches in Southampton for immediate action on climate change as part of an international day of action by the Climate Justice Coalition, with events happening across the globe. Pages 611 - 614 of **Exhibit CPG2**
- 4.10.48 13 December 2023 - Protesters from Nottingham Extinction Rebellion occupied St Peters Square holding banners stating 'COP 28 - Betrayal'. Pages 619 - 620 of **Exhibit CPG2**
- 4.10.49 14 December 2023 - JSO supporters gathered outside Keir Starmer's house demanding that Starmer commits to cancelling all new oil and gas licences, including those already greenlit by the current government. Pages 621 - 624 of **Exhibit CPG2**

- 4.10.50 18 December 2023 – A two-hour Just Stop Oil protest march was held around Cambridge’s ring road in response to “the dismal failure of COP28”. The march included 14 people and the police were not involved. Pages 625 - 626 of **Exhibit CPG2**
- 4.10.51 20 January 2024 - environmental activists staged a sit-in at Barclays bank in Cambridge – calling for an end to the bank’s funding of the fossil fuel industry. Pages 646 - 650 of **Exhibit CPG2**
- 4.10.52 22 January 2024 - Fossil Free London, Just Stop Oil, Extinction Rebellion and Scientists for Extinction Rebellion protested in Parliament Square, urging MPs not to back the Offshore Petroleum Licensing Bill. Pages 651 - 655 of **Exhibit CPG2**
- 4.10.53 24 January 2024 - Members of East and North Hertfordshire XR targeted the Barclays branch in North Street, Bishop’s Stortford, to highlight the institution’s fossil fuel investments. Page 656 of **Exhibit CPG2**
- 4.10.54 25 January 2024 - Climate activists gathered at the headquarters of Havas London to protest the ad agency’s relationship with Shell. Pages 657 – 658 of **Exhibit CPG2**
- 4.10.55 27 January 2024 - Greta Thunberg joined hundreds of local residents and activists to protest against the use of private jets and the expansion of Farnborough airport. Protesters held banners and placards that read “Ban Private Jets”. Pages 662 - 664 of **Exhibit CPG2**
- 4.10.56 27 January 2024 – Health professionals led a protest in Plymouth calling for an end to investment in fossil fuels. Pages 665 - 667 of **Exhibit CPG2**
- 4.10.57 1 February 2024 - Greenpeace activists dressed as Shell board members and danced around a burning sign reading ‘Your Future’ at a mock party outside Shell Centre Tower. Pages 673 - 675 of **Exhibit CPG2**
- 4.10.58 3 February 2024 - Protestors from Extinction Rebellion lay outside Barclays on Above Bar Street, Southampton, to protest against the bank’s alleged “funding of fossil fuel expansion”. Pages 680 - 681 of **Exhibit CPG2**
- 4.10.59 10 February 2024 - Members of Extinction Rebellion Wandsworth created a blockade at the junction of Putney High Street and Upper Richmond Road, armed with banners which read ‘Air Pollution Kills’ and ‘End Fossil Fuels Now’. Pages 685 - 686 of **Exhibit CPG2**

- 4.10.60 10 February 2024 - Activists from Extinction Rebellion protested outside Barclays Bank in Reading and campaigned against the banks investment in fossil fuels. Pages 687 – 689 of **Exhibit CPG2**
- 4.10.61 21 February 2024 - More than 40 of the top insurance firms in the City of London were sent an ultimatum letter by Extinction Rebellion demanding that leading insurers ‘pull the plug’ on the fossil fuel companies by refusing to insure new and existing oil, gas and coal projects and infrastructure. Pages 713 - 716 of **Exhibit CPG2**
- 4.10.62 23 February 2024 - The Oxford Climate Justice Campaign (OCJC) protested against the University of Oxford’s fossil fuel investments. The protest took place in Radcliffe Square at 2pm on Friday, with around 15-20 demonstrators present. Protesters handed out leaflets to passersby, and posed with signs and a banner calling for divestment. Pages 723-724 of **Exhibit CPG2**.
- 4.10.63 27 February 2024 – Extinction Rebellion commenced their “Insurance Week of Action” targeting the global insurance industry because they are “the people who could stop the fossil fuel crooks in their tracks overnight if they wanted to”. During this week-long campaign, protestors targeted offices in the square mile including the buildings of Lloyd’s of London, with the group announcing over 800 activists would form a blockade around the building. Police were involved and confirmed that arrests were made. Pages 725 - 774 of **Exhibit CPG2**.
- 4.10.64 29 February 2024- Extinction Rebelion infiltrated the London HQ of global advertising and media agency McCann Worldgroup, in protest against the “*company’s reported bid for another stint as top greenwasher for fossil fuel giants Saudi Aramco*”. On the same day, Extinction Rebellion protestors in Middlesbrough held a protest outside AXA’s office for “*the role they play in the climate and ecological emergency – the key ask being to put a stop of insuring all new fossil fuel projects and the opportunity for the insurance workers to be climate heroes*”.

5. **INCIDENTS OF GENERAL PROTESTOR ACTIVITY**

- 5.1 In addition to the incidents I refer to above, over the course of 2023, protestors also appear to have turned some of their attention to large scale sporting and other high-profile events. Presumably to raise their campaign against the industry with a wider audience. The nature of the incidents and the extremity (in some cases) of the lengths protestors are willing to go to is also, I believe, clear evidence that some individuals are still willing to carry out unlawful activity in order to advance their campaign. In particular, I am aware that:

- 5.1.1 28 May 2023 - JSO protestors stormed the football pitch at Twickenham, throwing orange paint onto the field and disrupting play. Pages 76 - 78 of **Exhibit CPG2**
- 5.1.2 1 June 2023 - JSO protestors briefly held up the England cricket team bus in London. Pages 85 - 87 of **Exhibit CPG2**
- 5.1.3 15 June 2023 - JSO protestors interrupted an opera performance during the Glyndebourne opera festival, letting off glitter cannons and blowing air horns. Pages 135 - 136 of **Exhibit CPG2**
- 5.1.4 28 June 2023 - two JSO protestors invaded the ground at the Ashes carrying orange paint dust. Pages 160 - 162 of **Exhibit CPG2**
- 5.1.5 3 - 5 July 2023 - JSO was reported to have refused to rule out disruption at the tennis in Wimbledon, with a spokesperson reported to have said that "*Just Stop Oil supporters will continue to do whatever is nonviolently necessary to end new oil and gas*" (Page 171 of **Exhibit CPG2**). Two matches at Wimbledon were later disrupted with JSO protestors throwing confetti and jigsaw pieces, citing objections to Wimbledon being sponsored by Barclays bank which JSO claims has lent £30 billion to oil and gas companies. It was reported that a man and a woman had been taken into custody. Page 176 of **Exhibit CPG2**
- 5.1.6 10 July 2023 - climate change activists gathered outside Wimbledon's gate to protest against the tournament being sponsored by Barclays Bank, on grounds that it is one of the "*biggest fossil fuel investors in the banking industry*". Pages 182 - 183 of **Exhibit CPG2**
- 5.1.7 15 July 2023 - JSO protestors invaded the stage during the Proms and interrupted a live broadcast of Channel 4's "The Last Leg". Pages 212 - 215 of **Exhibit CPG2**
- 5.1.8 21 July 2023 - JSO invaded the green during the Open Championship at Hoylake, spreading orange powder over the green and setting off a smoke flare, resulting in four people being reported to be arrested for conspiracy to commit criminal damage and public nuisance. Pages 222 - 224 of **Exhibit CPG2**
- 5.1.9 27 July 2023 - a portrait of the King held in the National Gallery of Scotland was vandalised by the climate group, "This Is Rigged". Pages 229 - 230 of **Exhibit CPG2**
- 5.1.10 6 August 2023 - "This Is Rigged" protestors disrupted the Cycling World Championship, by gluing themselves to the road, calling upon the Scottish Government to "*stand up to Westminster and oppose all new oil and gas...*". Pages 254 - 256 of **Exhibit CPG2**

- 5.1.11 13 August 2023 - protestors disrupted the AIG Women's Golf Open with JSO setting off flares in protest against the UK Government's approach to the licensing of oil, gas and coal. Pages 275 - 281 of **Exhibit CPG2**
- 5.1.12 31 August 2023 - Fossil Free London protestors disrupted a performance of "Romeo and Juliet" at the West End, citing the theatre's partnership with Barclays as their reasoning. Pages 302 - 305 of **Exhibit CPG2**
- 5.1.13 4 October 2023 - JSO protestors locked themselves to the stage and interrupted a performance of "Les Miserables" at the West End. Pages 381 - 385 of **Exhibit CPG2**
- 5.1.14 15 October 2023 - JSO staged a protest at a gaming convention final, Tekken 7 at EGX 2023 in London. Dressed as ghostbusters, protestors used specially adapted water pistols to spray orange paint over the equipment. Pages 427 - 429 of **Exhibit CPG2**
- 5.1.15 6 November 2023 - two JSO protestors were arrested after smashing the protective glass protecting the "Rokeby Venus" painting at the National Gallery. Pages 500 - 501 of **Exhibit CPG2**
- 5.1.16 1 February 2024 - Greta Thunberg joined Extinction Rebellion protestors and interrupted a panel talk organised at the Science Museum by hanging banners that said "2024, more droughts, floods and deaths - fuelled by Science Museum oil and gas sponsors". Pages 677 - 679 of **Exhibit CPG2**
- 5.2 Protestors have also targeted public sector institutions which protestors have referred to as "centres of oppression", in particular I note:
 - 5.2.1 2 December 2023 - JSO protestors held a demonstration outside the Metropolitan Police's central London headquarters. Protestors held speeches in which they said they would take their protest to other London sites, which they dubbed "centres of oppression", such as the Supreme Court. "The police think they can stop our protests. They can never stop our protests." Pages 578 - 579 of **Exhibit CPG2**
 - 5.2.2 4 December 2023 - Defend Our Juries protested outside Sheffield Crown Court against "attacks" on the rights of juries within the criminal justice system. The campaign cites a desire to protect the principle of 'jury equity', which has seen a number of climate activists acquitted of charges stemming from direct action protests. Pages 583 - 590 of **Exhibit CPG2**
 - 5.2.3 8 December 2023 - Activists from Fossil Free London protested in front of the Uganda High Commission in Trafalgar Square in solidarity with seven Ugandan student activists facing trial on Friday 8 December. The students' arrests came

after they protested against the proposed East African Crude Oil Pipeline (EACOP). Pages 601 - 607 of **Exhibit CPG2**

5.2.4 12 February 2024 - Just Stop Oil protesters stood outside Isleworth Crown Court during the trial of a JSO protester from the M25 incident, which is part of the 'Protect Our Jurors' campaign. Pages 693 of **Exhibit CPG2**

6. **HARM CAUSED TO THE CLAIMANTS**

6.1 It remains the case that the Claimants have suffered loss and damage because of the Defendants' actions to date and are likely to suffer further loss and damage if the Defendants are not restrained by further injunction (which would be incapable of being compensated for in damages). Paragraph 7.1 of my First Witness Statement sets out the details of the loss suffered by the Claimants. The additional security costs (as mentioned at paragraph 7.7.2 of my First Witness Statement) continue to be incurred on an ongoing basis.

6.2 The level of security measures taken continues to be reviewed in respect of the Claimants' assets and are improved, increased and enhanced, as appropriate (for example, a new security fence was installed at the Claimants' Kingsbury Oil Terminal (which is covered under a separate injunction not concerned with these proceedings) and which cost approximately £625,000 following protestor activity in 2022).

6.3 Moreover, as previous judges have acknowledged (e.g. Johnson J at [34] and Hill J at [134-136]), the Defendants' conduct gives rise to potential health and safety risks and if those risks materialise they would cause serious harm which could not adequately be remedied by way of an award of damages. There is no evidence that the Defendants have the financial means to satisfy any award of damages even if the losses were capable of being quantified.

7. **REQUIREMENT FOR A FURTHER INJUNCTION**

7.1 As I have emphasised in this statement (and my previous evidence) the Claimants do not wish to stop protestors from undertaking peaceful protests whether near the Shell Sites or otherwise. It is pleasing to note that since the April Renewal Hearing, direct protestor activity against Shell has remained lawful, and the terms of the Injunction Orders have been respected (particularly outside and in the vicinity of Shell Centre Tower). This clearly indicates the Injunction Orders' continued effectiveness as a deterrent.

7.2 As is more fully explained in my First Witness and the accompanying witness statements however, unlawful activity at the Shell Sites presents an unacceptable risk of continuing and significant danger to the health and safety of staff, contractors, the general public, other persons visiting them and indeed the protestors themselves. The protection provided by the existence of the injunctions remains necessary to mitigate against the continued risk and the grave and irreparable harm which would arise if the prohibited activities recommenced.

- 7.3 As a general comment and, in my experience, such activist groups will often undertake a number of protests in short periods to maintain a continuous level of disruption and gain momentum going forward. In relation to the likelihood of continuing action against the Claimants and the wider Shell business specifically, I would note the following:
- 7.3.1 Somewhat inevitably, increased activity against Shell from protestors is occasionally as a result of increased attention that Shell and its wider business receives in the press or as a result of other amplifying events. For example, activity tends to increase following Shell publicising its quarterly results or whenever it announces a new strategic initiative (such as increased investment on the Victory gas field in the UK North Sea), as well as its Annual General Meeting. As such, I firmly believe that protestor activity is likely to continue in the future, particularly (as mentioned) following the occurrence of certain amplifying events.
- 7.3.2 A press release issued by Just Stop Oil following protestors storming the pitch at the Gallagher Premiership Rugby final at Twickenham stated, *"Our indefinite campaign of civil resistance is underway and will not end until our government makes a meaningful statement halting new fossil fuel projects in the UK"*. Pages 146a – 146c of **Exhibit CPG2**
- 7.3.3 On 9 July 2023, a spokesperson for Just Stop Oil confirmed that they would continue their campaigns until the Government gives a *"meaningful statement"* that it will not any new licences for fossil fuel exploration within the UK and that *"The protests will continue, I can guarantee they will continue until the Government makes that statement"*. Pages 181a – 181d of **Exhibit CPG2**
- 7.3.4 Extinction Rebellion has also indicated that they will continue activity and appear to have joined forces with other protest groups / organisations by confirming in a statement on 11 August 2023 that *"we've forged alliances and friendships with other movements, organisations and groups, and are looking to build more connections with our community assemblies throughout the UK"*. Pages 270 - 271 of **Exhibit CPG2**
- 7.3.5 Just Stop Oil, in an interview with the Guardian on 30 October 2023 explained that they were not fazed by the potential of criminal consequences of carrying out unlawful activity in the context of slow marches, by stating *"Just Stop Oil supporters are willing to slow march to the point of arrest today and every day until the police take action to prosecute the real criminal the people who are facilitating new oil and gas when they know that to do so will kill hundreds of millions of people"*. Pages 483 – 484 of **Exhibit CPG2**
- 7.3.6 Very recently, on 3 March 2024, Just Stop Oil released a press statement outlining their plans for 2024 by stating:

“nonviolent civil resistance to a harmful state will continue, with coordinated, radical actions that reach out to new people and capture the attention of the world...Just Stop Oil will continue to be the major focus until we win, but we have a new three part demand: No New Oil, Revoke Tory Licences and Just Stop Oil by 2030. In addition to disrupting high-profile cultural events and continuing our Stop Tory Oil campaign, focussing on MP’s and those in power, this summer Just Stop Oil will commence a campaign of high-level actions at sites of key importance to the fossil fuel industry – airports.” Pages 775 - 776 of **Exhibit CPG2**

7.3.7 On 10 March 2024, an article in the Sunday Express recorded that Just Stop Oil activists had raised £285,863 of their £1m target through donations which will fund plans for *“major disruption”* and the spokesperson from Just Stop Oil stated that *“We’re ready to do battle bigger and better. We want 2024 to be even bigger”*. Pages 777-778 of **Exhibit CPG2**.

7.4 I am aware of other organisations operating within the oil and gas sector also seeking injunctions to specifically protect oil refineries and petrol stations, as follows:

Essar				
Claim No.	Parties	Locations affected by order	Type of Sites	Date and Length of Injunction
PT-2022-000326	<p>Claimants:</p> <p>(1) Essar Oil (UK) Limited</p> <p>(2) Stanlow Terminals Limited</p> <p>(3) Infranorth Limited</p> <p>Defendants:</p> <p>Persons unknown in connection with Extinction Rebellion Campaign or the Just Stop Oil Campaign...</p>	<ul style="list-style-type: none"> • Stanlow Manufacturing Complex, Ellesmere Port, • surrounding roads at Stanlow • entrances and exits to the Stanlow Terminal • Tranmere Oil Terminal, Birkenhead • entrances and exits to the Tranmere Terminal 	Registered Office and Terminals	Further interim injunction granted on 11 May 2023 for 1 year.

		<ul style="list-style-type: none"> • Northampton Oil Terminal, Northampton • entrances and exits to the Northampton Terminal 		
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North Warwickshire

Claim No.	Parties	Locations affected by order	Type of Sites	Date and Length of Injunction
QB-2022-001236	<p>Claimants:</p> <p>North Warwickshire Borough Council</p> <p>Defendants:</p> <p>(1-18) Named Defendants</p> <p>(19) Persons unknown...</p>	Kingsbury Oil Terminal	Oil Terminal	14 April 2022 (as varied on 6 May 2022) – Injunction – Power of Arrest 9 May 2022 – Interim Injunction Order Until hearing of the claim unless varied or discharged by further order.

Esso & Exxonmobil

Claim No.	Parties	Locations affected by order	Type of Sites	Date and Length of Injunction
QB-2022-001098	<p>Claimants:</p> <p>(1) Esso Petroleum Company, Limited</p> <p>(2) Exxonmobil Chemical Limited</p> <p>Defendants:</p> <p>Persons unknown in connection with Extinction Rebellion Campaign or the Just Stop Oil Campaign...</p>	<ul style="list-style-type: none"> • the Oil Refinery and Jetty at the Petrochemical Complex, Southampton • Hythe Terminal, Handley • Avonmouth Terminal, Bristol • Birmingham Terminal, Birmingham 	Refineries, Terminals, Pumping Station & Chemical Plant	Final Injunction granted on 18 July 2023 for 5 years subject to: (a) a review following the Supreme Court decision in <i>Wolverhampton City Council v London Gypsies and Travellers</i> (2022/0046) and, (b) annual review.

		<ul style="list-style-type: none"> • Purfleet Terminal, Essex • West London Terminal, Middlesex • Hartland Park Logistics Hub, Farnborough • Alton Compound, Hollybourne • Chemical Plant, Southampton • entrances or exits to any of the Sites 		
QB-2022-002577	<p>Claimants:</p> <p>(2) Esso Petroleum Company Limited</p> <p>Defendants:</p> <p>(1) Scott Breen</p> <p>(2) Persons Unknown</p>	<ul style="list-style-type: none"> • Southampton to London Oil Pipeline Project 	Construction of Pipeline	Final injunction granted until 31 December 2023 . (note the shorter period granted was due to the specific programme of works / completion of the construction of the pipeline)
Thurrock Council and Essex County Council				
Claim No.	Parties	Locations affected by order	Type of Sites	Date and Length of Injunction
QB-2022-00317	<p>Claimants:</p> <p>(1) Thurrock Council</p> <p>(2) Essex County Council</p> <p>Defendants:</p> <p>(1) Madeline Adams</p> <p>(2-222) Other Named Defendants</p>	<ul style="list-style-type: none"> • Roads within the Thurrock and Essex Council boundaries • Administrative areas of Thurrock and Essex • Fuel Terminals: 	Any roads surrounding Terminals in council areas, fuel terminals and storage facilities.	1 June 2022 – Original Injunction Order Injunction extended by order dated 27 January 2023 “until and subject to any further order”.

	(223-229) Persons unknown...	<ul style="list-style-type: none"> • The Navigator Fuel Terminal, West Thurrock • The Esso Fuel Terminal, Purfleet • Exolum Storage Ltd, Grays • Oikos Storage Limited, Essex 		
UK Oil Pipelines Ltd and West London Pipeline and Storage Ltd				
Claim No.	Parties	Locations affected by order	Type of Sites	Date and Length of Injunction
PT-2022-000303	Claimants: UK Oil Pipelines Ltd West London Pipeline and Storage Ltd Defendants: Persons Unknown	<ul style="list-style-type: none"> • Buncefield • Kingsbury 	Terminals	Final Injunction granted for 5 years until 20 October 2028 subject to annual review.
Exolum				
Claim No.	Parties	Locations affected by order	Type of Sites	Date and Length of Injunction
QB-2022-001142	Claimants: Exolum Pipeline Systems Ltd Exolum Storage Ltd Exolum Seal Sands Ltd Defendants: Persons Unknown	<ul style="list-style-type: none"> • Various 	Terminals and associated equipment	Final interim injunction granted on 23 January 2023 until February 2024.
Valero				

Claim No.	Parties	Locations affected by order	Type of Sites	Date and Length of Injunction
QB-2022-000904	<p>Claimants:</p> <p>VALERO ENERGY LTD</p> <p>(2) VALERO LOGISTICS UK LTD</p> <p>(3) VALERO PEMBROKESHIRE OIL TERMINAL LTD</p> <p>Defendants:</p> <p>(1) and (2)</p> <p>Persons unknown (as defined in the proceedings</p> <p>(3 – 19) Named Defendants</p>	<p>Pembroke oil refinery, Angle, Pembroke SA71 5SJ</p> <p>Pembroke oil refinery jetties at Angle, Pembroke SA71 5SJ</p> <p>Manchester oil terminal at Churchill Way, Trafford Park, Manchester M17 1BS</p> <p>Kingsbury oil terminal at Plot B, Trinity Road, Kingsbury, Tamworth B78 2EJ</p> <p>Plymouth oil terminal at Oakfield Terrace Road, Cattedown, Plymouth PL4 0RY</p> <p>Cardiff oil terminal at Roath Dock, Rover Way, Cardiff CF10 4US</p> <p>Avonmouth oil terminal at Holesmouth Road, Royal Edward Dock, Avonmouth BS11 9BT</p> <p>Pembrokeshire terminal at Main Road, Waterston, Milford Haven SA73 1DR</p>	Oil refineries and jetties	Final injunction for 5 years granted until 13 December 2028

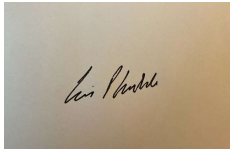
7.5 The evidence I have outlined, of all the activities of protestors which have taken place since the injunction orders of May 2023, taken together with these statements threatening further activity lead me to believe that that there remains a real risk of future unlawful activity at the Shell Sites by protest groups looking to target the Claimants’ business as well as the oil industry more generally.

7.6 For the reasons I have outlined in this statement I also believe it is reasonable to conclude that the reduction in unlawful activity since the Claimants’ were granted injunctive relief has been achieved as a consequence of those interim injunctions. It is for that reason also that I genuinely believe that, absent the continuation of the injunctions unlawful protest action would resume. The continuation of the injunctions also provide the police and the Claimants’ with the ability to take swift and impactful action if such unlawful activity does resume.

7.7 I would therefore respectfully ask that the Court grant the continuation of the Injunction Orders beyond their current expiry dates on the terms sought or alternatively as the Court considers appropriate.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to made, a false statement in a document verified by a statement of truth without an honest belief in its truth.



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Christopher Prichard-Gamble

Dated: 14 March 2024