

Keith Garwood  
First Witness Statement  
Party: Claimant  
Date: 14 April 2022  
Exhibit KG1

IN THE HIGH COURT OF JUSTICE

Claim No.

QUEEN'S BENCH DIVISION

BETWEEN

SHELL INTERNATIONAL  
PETROLEUM COMPANY LIMITED

Claimant

- and -

PERSONS UNKNOWN ENTERING OR  
REMAINING IN THE BUILDING KNOWN  
AS SHELL CENTRE TOWER,  
BELVEDERE ROAD, LONDON ("SHELL  
CENTRE TOWER") WITHOUT THE  
CONSENT OF THE CLAIMANT, OR  
DAMAGING OR BLOCKING THE  
ENTRANCES TO THE SAID BUILDING,  
IN CONNECTION WITH THE  
ENVIRONMENTAL PROTEST  
CAMPAIGNS OF JUST STOP OIL AND/OR  
EXTINCTION REBELLION AND/OR  
YOUTH CLIMATE SWARM AND/OR  
SCIENTIST REBELLION

Defendants

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WITNESS STATEMENT OF KEITH  
GARWOOD

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I, **KEITH GARWOOD** of Shell Centre, York Road, London SE1 7NA **WILL SAY AS FOLLOWS:**

## **1. INTRODUCTION**

- 1.1 I am an Asset Protection Manager employed by Shell International Limited, which is within the same group of companies as the Claimant.
- 1.2 Unless otherwise stated, the facts set out in this statement are within my own knowledge and true. Where 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.
- 1.3 References to page numbers within this statement are to pages within the exhibit annexed as KG1.
- 1.4 This statement has been prepared in support of the Claimant's claim for injunctive relief in respect of the building known as the Shell Centre Tower, Shell Centre, London SE1 7NA (the "**Shell Centre Tower**").

## **2. PURPOSE OF THE STATEMENT**

- 2.1 The purpose of my statement is to comment on the following issues in support of the Claimant's claim for an injunction:
  - 2.1.1 My role and responsibilities.
  - 2.1.2 Description of the Shell Centre Tower.
  - 2.1.3 Previous issues and concerns with protestors.
  - 2.1.4 The security position at the Shell Centre Tower.
  - 2.1.5 Current issues and concerns with protestors.
- 2.2 The injunction is being sought against individuals associated with the campaign groups known as Just Stop Oil, Extinction Rebellion, Youth Climate Swarm, and Scientist Rebellion.
- 2.3 I want to be clear, the Claimant does not wish to stop protestors, whether connected with these groups or otherwise, from undertaking peaceful protests whether near the Shell Centre Tower or otherwise. However, and reluctantly as a result of the events I set out in my statement, and to mitigate the potential health, safety and wellbeing risks to the Claimant's employees, contractors and visitors, the Claimant has made the decision to make this application in order to seek to prevent potentially unlawful actions and activities.

## **3. MY ROLE AND RESPONSIBILITIES AT SHELL**

- 3.1 I am employed by Shell International Limited, which is in the same group of companies as the Claimant, as an Asset Protection Manager. I have been in this role for around 13.5 years.
- 3.2 The role of an Asset Protection Manager is to ensure the safety and security of contractors, staff and visitors within the property assets for which he or she is responsible.
- 3.3 I am responsible for the security provision of the following sites: Shell Centre in London (which includes the Shell Centre Tower and 20 York Road), the Bacton Gas Plant in Norfolk, the Petersons Supply Depot in Great Yarmouth and the Shell Haven Tank Farm in Essex.
- 3.4 I carry out a security risk assessment for each of these sites (which is reviewed and conducted annually) to ensure that any security risks are mitigated to an ALARP (as low as reasonably

possible) standard. Part of undertaking these security risk assessments is to identify and take practical steps to make the relevant sites secure.

#### **4. THE SHELL CENTRE TOWER**

4.1 The Shell Centre Tower 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.

4.2 I have seen a copy of the official copy of title plan TGL8482 (page 2 of KG1) which shows that the Claimant's interest extends beyond the Shell Centre Tower.

4.3 The top floor of the Shell Centre Tower houses the plant and machinery for the building and the floors below are reserved as offices and meeting spaces for use by various Shell entities, including the Claimant (together "Shell").

4.4 The Shell Centre Tower is owned by the Claimant, managed by Shell and its contractors, and occupied and used by Shell's employees, contractors, agents and visitors/guests.

4.5 In early 2022, Shell's headquarters moved from the Hague to London.

##### ***Employee numbers***

4.6 I receive an update twice a day on the levels of staff in Shell Centre.

4.7 There are around 5,000 people registered to the Shell Centre, from Shell (i.e. Shell employees) globally. My understanding is that the capacity at Shell Centre (the Shell Centre Tower and 20 York Road) is around 3,000. Those figures have been impacted by working from home directives since the COVID pandemic. The highest number of Shell staff, contractors and visitors at Shell Centre post-COVID has been about 1,500.

#### **5. PREVIOUS ISSUES AND CONCERNS WITH PROTESTORS**

##### ***Protests in April 2019***

5.1 The Shell Centre was targeted by Extinction Rebellion on 15 April 2019, with the protestors inflicting significant damage and to the building including to the Shell Centre Tower. At around 12:30pm on that day, approximately 30 people arrived at the Shell Centre Tower.

5.2 Three of the protestors glued themselves to the revolving doors at the front of the Shell Centre Tower. Two of these protestors painted symbols on the glass doors. The third protestor smashed one of the glass panes in the revolving door (which she was glued to) and caused damage to an adjacent leaf door using an implement which looked like a centre punch tool. I consider that it was extremely lucky that she was not seriously injured in the process.

5.3 A further two protestors climbed onto a canopy overhanging the revolving doors, where they remained until the following day. Other protestors sprayed slogans and drawings on the walls and the windows on the side of the Shell Centre Tower. Copies of photographic evidence of this event and the damage caused are exhibited at pages 5, 27 and 50 – 54 of KG1.

5.4 This incident posed serious safety risks. The smashing of glass posed a serious threat to those in the vicinity, both protestors and staff/contractors. The canopy is also not designed to be load-bearing, so I was concerned that protestors had climbed onto it in case it was to collapse which could have resulted in significant injuries to those protestors and potentially anyone in the vicinity.

5.5 The activity also caused logistical safety risks. During the incident, the majority of staff, visitors and contractors, had to come in and out of a back entrance of 20 York Road. These logistical

difficulties were exacerbated by a refurbishment that was being undertaken at the time, which meant that other access points were restricted. Approximately 750 people had to be escorted out via the 20 York Road exit. The restriction of entrances and exits posed a clear safety risk, particularly if the building needed to be evacuated in an emergency. The protestors also seemed to intimidate and frighten a large number of staff.

- 5.6 The three protestors who glued themselves to the Shell Centre Tower and the two protestors who climbed onto the canopy (and I understand two others) were prosecuted. Despite causing significant damage to the Shell Centre Tower, and despite the judge directing the jurors that the individuals had no defence in law, the protestors were acquitted by the jury. I note from Extinction Rebellion's website (pages 3 – 49 of KG1), which contains a number of photographs of the damage caused by these protestors (named the 'Shell 7'), that the protestors are stated to have "*intentionally created more than £5,000 worth of damage so they could put their case before a jury of their peers*". It is particularly concerning that Extinction Rebellion's website refers to the "Shell 7" trial as being "*the first in a series of acquittals*" with a further "*13 jury trials scheduled over the coming months*" including another for criminal damage. To me this suggests an intention to cause damage rather than peacefully to protest.

## 6. SECURITY AT SHELL CENTRE TOWER

- 6.1 Shell Centre Tower has many security measures and those have been increased since the April 2019 protest. Shell Centre Tower has a permanent manned security staff, CCTV and access controls. However, as I will explain, even with these increased measures it has not proved possible to prevent all incursions to the building. Whilst the doors of the building can be secured, doing so clearly significantly restricts and constrains people using the building from coming in and out.
- 6.2 More significantly, the Claimant is concerned that activity which blocks entrances necessarily reduces the number of available emergency exits from the building. The nature of the protests has been to attempt to cause maximum and long-lasting disruption at a targeted entrance. The way in which that is done (including by protestors gluing themselves to make themselves difficult to remove) means that the entrances cannot just be immediately cleared again in an emergency.
- 6.3 Since April 2019 the canopy at the front of the Shell Centre Tower (which was climbed on during those protests) has been replaced. As I have said, the previous canopy was not built to withstand people climbing on it, and neither is the new canopy. I believe that there is a serious risk that the canopy could fail if protestors climb upon it again, with the potential to cause serious injury to the protestors and also to others in the immediate vicinity.
- 6.4 Outside of the Shell Centre Tower, to the North, there is a hostile vehicle mitigation system ("HVM") (2 retractable bollards). The HVM allows emergency and service vehicles to securely access the south bank estate, which includes a number of residential buildings as well as offices. When there are groups of people undertaking protest activities outside of Shell Centre Tower, this blocks access to the HVM and, therefore, to the south bank estate. I believe that restricting emergency vehicles from being able to access the south bank estate poses a significant health and safety risk.
- 6.5 In addition, it is possible to lock all of the external doors simultaneously. Once the lockdown has been initiated, we (the security team) then man the individual external leaf doors and provide access to individuals, provided that they can prove they are staff or contractors.

- 6.6 Initiating a lockdown helps significantly and is the best solution when there is protestor activity outside of Shell Centre Tower. It limits people wandering around opening doors and gaining access. However, it does cause some issues as whilst we have protocols in place, it limits the number of entrances and depending on the location of the activity may have a potentially significant impact on the ability for emergency exit and for emergency services to attend at the Shell Centre Tower.
- 6.7 My primary concern is that the fire alarm is activated whilst we are in lockdown or that the emergency services are required to attend the offices, and that the lockdown will cause delay to either evacuation or entrance. Further, should anyone in the building need to exit in an emergency, for example to get home to their family, the exit process will be more complicated and time consuming. This would obviously be extremely distressing for the individual.
- 6.8 In my experience, what some protestors are really seeking is to gain access to the buildings. Until the most recent events, discussed below, protestors have only managed to gain access to the Shell Centre Tower on one occasion. Unfortunately, on 13 April 2022, protestors were again able to enter the Shell Centre Tower.

## **7. CURRENT ISSUES AND CONCERNS WITH PROTESTORS PRIOR TO APRIL 2022**

### ***Recent protest activity***

- 7.1 Since April 2019 and the beginning of the COVID-19 pandemic, Shell Centre Tower has been subject to one or two smaller protest groups (not necessarily Extinction Rebellion).

### ***Protest movements***

- 7.2 My understanding is that the main protest group is Extinction Rebellion. Just Stop Oil, Youth Climate Swarm, and Scientist Rebellion seem to be splinter groups from the main Extinction Rebellion group. They all appear to have the same stated aims of disrupting the oil and gas industry with the hope of obtaining enough publicity/support behind their cause to encourage the government to change its energy policies.

## **8. 6 APRIL 2022 PROTEST**

- 8.1 Last Wednesday, 6 April 2022, protestors from a group called Scientist Rebellion, arrived outside of Shell Centre Tower just after 11am.
- 8.2 I believe there were around 20 people, including photographers who were recording the event. They were wearing white scientist coats; they stood in a line and held a big banner that said "*Scientist Rebellion*" complete with what I understand is the Extinction Rebellion logo.
- 8.3 One of them threw paint bombs or equivalent at the Shell Centre Tower; I understand that it contained some kind of a vegetable oil mixed with vegetable dye. There are now large black marks and splashes all over the walls and above one of the staff entrances of the Shell Centre Tower.
- 8.4 At the time, we immediately put the building into lockdown. A number of employees and contractors needed to be escorted out, but the protest action was solely focused on the back of the Shell Centre Tower. The protestors arrived around 11am and were there for around two to two and a half hours. The police arrested the man who threw the paint bombs.
- 8.5 I have seen that Extinction Rebellion have reported this incident on their website (pages 45 – 49 of KG1). Photos of the damage have also been annexed to this witness statement at pages 55-59 of KG1.

## 9. 13 APRIL 2022 PROTESTS

9.1 On the morning of 13 April 2022, I understand that protestors met in Hyde Park at 11am and from there moved to Trafalgar Square where they split up into two groups. One of those groups made its way towards Shell Centre.

9.2 Our security team were then put on high alert.

9.3 The main group of around 500 protestors arrived outside Shell Centre Tower at around 1:30pm. The Shell Centre site was put into lockdown around this time.

### *Inside Shell Centre Tower*

9.4 However, in advance of that group's arrival, eight protestors dressed in business attire entered Shell Centre Tower and 20 York Road.

9.5 Five of the protestors made their way into the reception of Shell Centre Tower.

9.6 Having entered reception, the protestors proceeded to superglue themselves to different parts of the reception area:

9.6.1 one male glued himself next to a pillar in the reception area;

9.6.2 one female glued herself to a pillar (she informed me that she was one of the Shell 7 from the April 2019 protests and recognised me from Court); and

9.6.3 two protestors glued themselves to the reception desk.

9.7 Stills from the reception's security footage showing the five protestors, and the police, are exhibited at pages 61 – 63 of KG1.

9.8 Three protestors also made their way into the reception of 20 York Road. These protestors glued themselves to the reception desk there. A photograph of these three protestors was published on Extinction Rebellion's website (pages 38 – 44 and 60 of KG1).

9.9 At around 3:15pm a police team specialising in glue removal arrived to unglue the protestors. I understand all of the glued protestors were arrested.

9.10 Of more significant concern is that fact that one of the five protestors managed to make his way up to the fourth floor of the Shell Centre Tower (pages 64 – 67 of KG1).

9.11 Whilst on the fourth floor he took pictures of the employees and videos of himself which he posted on Twitter. A member of staff challenged him and he was then escorted down to reception where he was searched by the police and arrested.

9.12 The member of staff was understandably quite distressed and concerned by the incident and also about whether any photos or footage of her or any of her colleagues would appear on the protestor's social media.

### *Outside Shell Centre Tower*


9.13 As stated, around 500 protestors amassed outside of Shell Centre Tower. Various photographs showing these protestors outside of Shell Centre Tower, in Belvedere Road, and in Jubilee Gardens opposite the tower are at pages 68 – 78 of KG1.

9.14 In addition to swamping the entrance to Shell Centre Tower, banging drums to create significant noise, both of which I consider to be intimidating to staff, the protestors also unfurled large banners in Belvedere Road and Jubilee Gardens stating, "Jump Ship" and "Shell = Death". My view is that these can only be directed at Shell's members of staff.

- 9.15 The protestors have also graffitied and stuck stickers with the Extinction Rebellion logo on the walls outside Shell Centre Tower and 20 York Road. Photographs of this damage are at pages 79 – 81 of KG1.
- 9.16 Members of staff have been extremely upset and disturbed by these protests. Like me, they are principally concerned about the health and safety risks of having the entrances and exits to the buildings blocked as well as being restricted as to how and when they can leave in the event that they need to do so urgently. Further, they want to be able to come to work without being intimidated.
- 10. CONCERNS**
- 10.1 My greatest concerns are that the protestors will continue to (1) block the entrances and exits to the Shell Centre Tower; and (2) endeavour to enter into the Shell Centre Tower and obtain access to the office space or vandalise or damage the premises.
- 10.2 My concerns are first and foremost about the people in and around the Shell Centre Tower. It is clearly unsafe for entrances and exits to be blocked. I am also concerned to prevent protestors from entering and intimidating and/or frightening staff and causing significant damage within the building. I believe that staff have been intimidated by the protestors' entry into Shell Centre Tower and 20 York Road on 13 April 2022.
- 10.3 My concern is heightened when I see that Scientist Rebellion's website contains a guide to "throwing 'blood'/slime/paint", "pasting papers" and most alarming to me, given the events in 2019, "safely cracking windows" pages 82 – 84 of KG1. I am also concerned that, based on the stated aims of Extinction Rebellion and Just Stop Oil, that the protests may continue for a significant length of time.

## 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 be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: 

Name: **KETA GARWOOD**

Position: **ASSET PROTECTION MANAGER**

Dated: 14 April 2022

**Keith Garwood**  
**First Witness Statement**  
**Party: Claimant**  
**Date: 14 April 2022**  
**Exhibit KG1**

**Claim No.**

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**BETWEEN**

**SHELL INTERNATIONAL PETROLEUM  
COMPANY LIMITED**

**Claimant**

**- and -**

**PERSONS UNKNOWN ENTERING OR  
REMAINING IN THE BUILDING KNOWN AS  
SHELL CENTRE TOWER, BELVEDERE  
ROAD, LONDON WITHOUT THE CONSENT  
OF THE CLAIMANT, OR DAMAGING OR  
BLOCKING THE ENTRANCES TO THE SAID  
BUILDING, IN CONNECTION WITH THE  
ENVIRONMENTAL PROTEST CAMPAIGNS  
OF JUST STOP OIL AND/OR EXTINCTION  
REBELLION AND/OR YOUTH CLIMATE  
SWARM AND/OR SCIENTIST REBELLION**

**Defendant**

**FIRST WITNESS STATEMENT OF  
KEITH GARWOOD**

**Cannon Place  
78 Cannon Street  
London EC4N 6AF  
Ref: O10051.00007**

**Solicitors for the Claimants**



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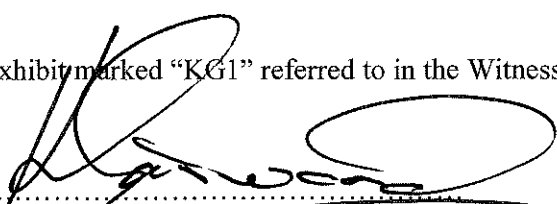
WITNESS STATEMENT OF KEITH  
GARWOOD  
EXHIBIT "KG1"

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This is the exhibit marked "KG1" referred to in the Witness Statement of Keith Garwood dated 14 April 2022.

Signed.....

Dated.....

  
14/4/2022