

**Christopher Prichard-Gamble**  
**First Witness Statement**  
**Party: Claimants**  
**Exhibit: CPG1**  
**Date: 30 March 2023**  
**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 ENVIRONMENTAL 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)**

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**First Witness Statement of Christopher Prichard-Gamble**

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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**").

1.3 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.

1.4 References to page numbers in this statement are to page numbers in **Exhibit CPG1**.

1.5 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 made in support of the application and/or request for the continuation of the interim injunction orders made by this Court dated:

- 2.1.1 3 May 2022 by Bennathan J in respect of the Shell Centre Tower Proceedings (“**the Shell Centre Tower Injunction Order**”) – this injunction is due to expire on 2 May 2023;
- 2.1.2 17 May 2022 (as amended on 20 May 2022) by Johnson J in respect of the Shell Petrol Stations Proceedings (“**the Shell Petrol Stations Injunction Order**”) – this injunction is due to expire at 4pm on 12 May 2023; and
- 2.1.3 3 May 2022 by Bennathan J in respect of the Shell Haven Proceedings (“**the Shell Haven Injunction Order**”) – this injunction is due to expire on 2 May 2023.

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

2.2 In relation to the Shell Haven Proceedings, it should be noted that:

- 2.2.1 the initial injunction application sought an injunction in respect of two oil refineries: (1) known as Shell Haven Oil Refinery, the Manorway, Stanford Le-Hope (“**Shell Haven**”) and (2) Kingsbury Terminal, Piccadilly Way, Kingsbury (“**the Kingsbury Terminal**”);
- 2.2.2 at the hearing on 14 April 2022 before Mr Justice Sweeting, the application in so far as it relates to the Kingsbury Terminal was adjourned. This was because the Court had separately awarded an injunction to North Warwickshire Borough Council which included a power of arrest pursuant to statutory powers – which it was considered would provide the relief sought in respect of Kingsbury Terminal; and
- 2.2.3 the Shell Haven Injunction Order therefore only relates to Shell Haven.

2.3 This witness statement is made in respect of each of the proceedings making up the Proceedings and is made together with:

- 2.3.1 in respect of the Shell Centre Tower Proceedings:
  - 2.3.1.1 the third witness statement of Keith Garwood in the Shell Centre Tower Proceedings dated 30 March 2023; and
  - 2.3.1.2 the witness statement of Alison Oldfield dated 29 March 2023 (which is a single witness statement made in respect of each of the proceedings making up the Proceedings).
- 2.3.2 in respect of the Shell Petrol Stations Proceedings:

- 2.3.2.1 the third witness statement of Benjamin Austin in the Shell Petrol Station Proceedings dated 30 March 2023; and
    - 2.3.2.2 the witness statement of Alison Oldfield dated 29 March 2023 (which is a single witness statement made in respect of each of the proceedings making up the Proceedings).
  - 2.3.3 in respect of the Shell Haven Proceedings:
    - 2.3.3.1 the first witness statement of Fay Lashbrook in the Shell Haven Proceedings dated 30 March 2023; and
    - 2.3.3.2 the witness statement of Alison Oldfield dated 29 March 2023 (which is a single witness statement made in respect of each of the proceedings making up the Proceedings).
- 2.4 In this witness statement I outline:
  - 2.4.1 the background to the making of the Injunction Orders;
  - 2.4.2 the Injunction Orders;
  - 2.4.3 the operational significance of the sites which are subject to the Injunction Orders – being:
    - 2.4.3.1 Shell Centre Tower, Belvedere Road, London (“**Shell Centre Tower**”);
    - 2.4.3.2 Shell Petrol Stations in England and Wales (“**the Shell Petrol Stations**”); and
    - 2.4.3.3 Shell Haven(Shell Centre Tower, the Shell Petrol Stations and Shell Haven together being “**the Shell Sites**”);
  - 2.4.4 the incidents of direct-action protest against the Claimants and the wider Shell group companies and business since the Injunction Orders were granted;
  - 2.4.5 the harm caused to the Claimants by virtue of the protest activity; and
  - 2.4.6 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.
- 2.5 I should note at the outset that whilst the Claimants do not wish to stop protestors from undertaking peaceful protests whether near the Shell Sites or otherwise (and peaceful

protests have indeed taken place near them since the award of the Injunction Orders), it is considered necessary to seek the continuation of the interim injunctions made by this Court pursuant to the Injunction Orders so as to mitigate the very serious health, safety and wellbeing risks to the Claimants' employees, contractors and visitors which potentially unlawful actions and activities at them present.

### 3. **BACKGROUND TO THE INJUNCTION ORDERS**

3.1 In early 2022, the Claimants became aware that Extinction Rebellion ("**XR**") (a campaign group formed in October 2018 which seeks to affect government policy on climate change through civil disobedience) published guidance about its intention to take disruptive action to end the fossil economy. It called upon members of the public to support XR's aims. XR was not the only group at that time which sought to disrupt the Claimants' lawful activities with the aim of encouraging the Government to amend its energy policies and end the extraction and use of fossil fuels. There were various groups associated with this stance and many of the individuals who took the unlawful actions against the Claimants and the wider Shell group of companies - which gave rise to the initial circumstances which merited the award of the Injunction Orders - appear to belong to campaign groups known as Just Stop Oil, XR, Youth Climate Swarm and Scientist Rebellion.

3.2 Matters came to a head in April/May 2022 when various activities were undertaken by individuals with the apparent aim of causing maximum disruption to the Claimants' lawful activities and thereby generate publicity for their protest movement.

3.3 The relevant incidents are more fully set out in:

3.3.1 the first witness statement of Keith Garwood dated 14 April 2022 and the second witness statement of Keith Garwood dated 22 April 2022 made in respect of the Shell Centre Tower Proceedings;

3.3.2 the first witness statement of Ben Austin dated 3 May 2022 and the second witness statement of Ben Austin dated 10 May 2022 made in respect of the Shell Petrol Stations Proceedings; and

3.3.3 the first witness statement of Stephen Ian Brown dated 13 April 2022 and the second witness statement of Stephen Ian Brown dated 22 April 2022 made in respect of the Shell Haven Proceedings.

3.4 However, by way of an overarching summary, I understand, from reviewing the above witness statements, that:

#### 3.4.1 Shell Centre Tower

3.4.1.1 On 15 April 2019, Shell Centre Tower was targeted by approximately 30 protestors from XR. The protestors:

- (a) glued themselves to the revolving glass doors at the front of Shell Centre Tower;
- (b) painted symbols on the revolving doors;
- (c) smashed one of the glass panes in the revolving doors;
- (d) caused damage to a leaf door adjacent to the revolving doors;
- (e) climbed onto the canopy overhanging the revolving doors where they remained until the following day;
- (f) sprayed slogans and drawings on the walls and the windows on the side of Shell Centre Tower; and
- (g) and further protesters glued themselves to the Shell Centre Tower.

3.4.1.2 On 6 April 2022, Shell Centre Tower was targeted by approximately 20 protestors from a group called Scientist Rebellion. The protestors threw paint bombs or equivalent at the Shell Centre Tower.

3.4.1.3 On 13 April 2022, approximately 500 protestors converged on Shell Centre Tower:

- (a) In advance of their arrival, further protestors (approximately eight) variously:
  - (1) made their way into the reception of Shell Centre Tower and proceeded to superglue themselves to different parts of the reception area;
  - (2) made their way into the reception of an adjoining building, which members of the wider Shell group of companies have offices in – 20 York Road – and superglued themselves to the reception desk there; and
  - (3) managed to make their way to the fourth floor of Shell Centre Tower where they took photographs of employees and videos of themselves which they posted on Twitter.
- (b) When the approximately 500 protestors amassed outside of Shell Centre Tower, they variously:

- (1) banged drums to create significant noise and an intimidating environment;
- (2) unfurled banners stating "*Jump Ship*" and "*Shell = Death*" – which in my view can only be directed at Shell's members of staff; and
- (3) graffitied and stuck stickers on the outside of Shell Centre Tower.

3.4.1.4 On 15 April 2022, approximately thirty protestors associated with XR obstructed Belvedere Road, which is the road on which Shell Centre Tower is located – Shell Centre Tower was put into a complete lockdown.

3.4.1.5 For obvious reasons, these incidents gave rise to very real health and safety concerns primarily for members of staff and members of the public within the vicinity of Shell Centre Tower at the time, but also for the protestors themselves.

### 3.4.2 Shell Petrol Stations

3.4.2.1 The main incident occurred on 28 April 2022, when a number of protestors targeted two petrol filling stations on the M25, namely at the Clacket Lane (which is a BP petrol station) and the Cobham service stations (which is a Shell petrol station) in Surrey (the "**Clacket Lane Services**" and "**Cobham Services**" respectively). The protestors' clear aim was to disrupt the operation of the filling stations in various ways. Amongst other things, the protestors: smashed the display screens of fuel pumps with a hammer; covered display screens in spray paint; referred to their action as "sabotage"; superglued themselves to the forecourt floor and fuel pumps; superglued themselves to the roof of a cab of a fuel tanker making a delivery to the Cobham Services; and blocked the entrance to the service station forecourt.

3.4.2.2 Across the Clacket Lane Services and Cobham Services, the media and Police reported that 55 fuel pumps were damaged – out of a total of 71.

3.4.2.3 These incidents gave rise to a continuing and significant danger and threat to the health and safety of staff, contractors, the general public and other persons which visit the Shell Petrol Stations - particularly as acts of sabotage to equipment on the

forecourt of a Shell Petrol Station (i.e. breaking fuel pump screens with any implement could cause a spark) are potentially extremely dangerous, possibly resulting in a fire or an explosion which could potentially harm anyone in the vicinity with possibly catastrophic and fatal consequences.

### 3.4.3 Shell Haven

3.4.3.1 Throughout April 2022 protestors targeted Shell Haven, the Kingsbury Terminal and the local area surrounding them. With regards to activity:

(a) in the locality of the surrounding area, protestors blocked road access, attempted to deflate tanker tyres, climb tankers, glued themselves to the road, entered the premises of Valero's terminals at the Kingsbury Terminal complex and dug tunnels under the surrounding roads which resulted in concerns about structural integrity of the access roads; and

(b) undertaken specifically at Shell Haven and the Kingsbury Terminal, this included:

(1) On 1 April 2022, four protesters blocked the main entrance gate at Kingsbury Terminal thereby completely blocking the way for tankers to enter and exit the premises;

(2) On 6 April 2022, four protestors laid down at the main entrance gate at Kingsbury Terminal and chained themselves together. This forced the closure of the terminal until the protestors were removed the following morning; and

(3) On 15 April 2022, six protesters breached the fence line at the rear of Shell UK's terminal at Kingsbury and entered 3 areas within the terminal. Four of these protestors climbed the gantry, gluing themselves to it whilst others climbed a parked tanker. The terminal went into shut down as a result of this action for thirteen hours.

3.4.3.2 Given that Shell Haven is used for the storage and supply of fuel which is a highly flammable and hazardous substance, the activities gave rise to serious health and safety concerns for employees, the public and protestors - whose activities unduly increased the risk of harm arising.



#### 4. THE INJUNCTION ORDERS

4.1 In the light of the incidents and the Claimants' concerns described above, the Claimants each issued their respective injunction proceedings in April / May 2022. In relation to:

##### 4.1.1 The Shell Centre Tower Proceedings

4.1.1.1 On 15 April 2022, Sweeting J granted SIPC an interim injunction in respect of Shell Centre Tower.

4.1.1.2 On the return date, 28 April 2022, Mr Justice Bennathan granted the Shell Centre Tower Injunction Order which prevented persons unknown from:

(a) Entering or remaining upon any part of the Shell Centre Tower without the consent of SIPC.

(b) Blocking access to any of the doors which provide access and egress to and from the Shell Centre Tower.

(c) Causing damage to any part of the Shell Centre Tower whether by:

(1) affixing themselves, or any object, or thing, to any part of the Shell Centre Tower, or to any other person or object or thing on or in Shell Centre Tower;

(2) erecting any structure in, on or against Shell Centre Tower;

(3) spraying, painting, pouring, sticking or writing with any substance on or inside any part of Shell Centre Tower; or

(4) otherwise

4.1.1.3 The injunction granted under the Shell Centre Tower Injunction Order was ordered to last for 1 calendar year until 28 April 2023, unless varied, discharged or extended by further order.

##### 4.1.2 The Shell Petrol Stations Proceedings

4.1.2.1 On 5 May 2022, Mrs Justice McGown granted an interim injunction in respect of the Shell Petrol Stations.

4.1.2.2 On the return date, 13 May 2022, Mr Justice Johnson granted the Shell Centre Tower Petrol Stations Proceedings which prevented persons unknown from:

- (a) blocking or impeding access to any pedestrian or vehicular entrance to a Shell Petrol Station or to a building within a Shell Petrol Station.
- (b) causing damage to any part of a Shell Petrol Station or to any equipment or infrastructure (including but not limited to fuel pumps) upon it.
- (c) operating or disabling any switch or other device in or on a Shell Petrol Station so as to interrupt the supply of fuel from that Shell Petrol Station, or from one of its fuel pumps, or so as to prevent the emergency interruption of the supply of fuel at the Shell Petrol Station.
- (d) affixing or locking themselves, or any object or person, to any part of a Shell Petrol Station, or to any other person or object on or in a Shell Petrol Station.
- (e) erecting any structure in, on or against any part of a Shell Petrol Station.
- (f) spraying, painting, pouring, depositing or writing in any substance on to any part of a Shell Petrol Station.
- (g) encouraging or assisting any other person do any of the acts referred to above.

4.1.2.3 The injunction granted under the Shell Petrol Stations Injunction Order was ordered to last until 4pm on 12 May 2023, subject to any further order of the Court.

4.1.2.4 The Shell Petrol Stations Injunction Order provided that any application seeking an extension of the injunction granted under it so that it continues in operation after 4pm on 12 May 2023 was to be made by 4pm on 28 February 2023. Following an application made by SUKOP on 14 February 2023, this deadline was extended to 31 March 2023 by order dated 21 February 2023.

#### 4.1.3 The Shell Haven Proceedings

4.1.3.1 On 15 April 2022, Mr Justice Sweeting granted an interim injunction in respect of Shell Haven.

4.1.3.2 On the return date, 28 April 2022, Mr Justice Bennathan granted the Shell Haven Injunction Order which prevented persons unknown from:

(a) entering or remaining upon any part of Shell Haven without the consent of Shell UK.

(b) blocking access to any of the gateways to Shell Haven the locations of which are identified on appended plans.

(c) causing damage to any part of Shell Haven whether by:

(1) affixing themselves, or any object, or thing, to any part of Shell Haven, or to any other person or object or thing on or at Shell Haven;

(2) erecting any structure in, on or against Shell Haven;

(3) spraying, painting, pouring, sticking or writing with any substance on or inside any part of Shell Haven; or

(4) otherwise.

4.1.3.3 The injunction granted under the Shell Haven Injunction Order was ordered to last for 1 calendar year until 28 April 2023, unless varied, discharged or extended by further order.

## 5. **OPERATIONAL SIGNIFICANCE OF THE SHELL SITES**

### 5.1 Shell Centre Tower

5.1.1 Shell Centre Tower is Shell's global headquarters and has been since January 2022. 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.

5.1.2 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 members of the Shell group of companies, including SIPC.

5.1.3 The Shell Centre Tower is owned by SIPC, managed by SIPC and its contractors, and occupied and used by employees of the Shell group of companies, contractors, agents and visitors/guests.

5.1.4 There are around 5,000 individuals registered to the Shell Centre from the Shell group of companies (i.e. Shell employees) globally. My understanding is that the capacity at Shell Centre (being the Shell Centre Tower and 20 York Road) is around 3,000. The highest daily number of staff, contractors and visitors at Shell Centre Tower post-COVID has been about 1,500.

## 5.2 Shell Petrol Stations

5.2.1 A more complete explanation of the importance of the Shell Petrol Stations is provided in the first witness statement of Ben Austin dated 3 May 2022, the second witness statement of Ben Austin dated 10 May 2022 and the third witness statement of Ben Austin dated 30 March 2023.

5.2.2 For present purposes, however, I would point out that:

5.2.2.1 Shell is 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.

5.2.2.2 SUKOP markets and sells retail fuels through the Shell Petrol Stations which constitute a network of 'Shell-branded' service stations. The retail network through which fuel is sold in the UK is divided into two main categories:

(a) direct - which involves a network of retail service stations where SUKOP owns or leases the land where the retail site is located and typically will own the structures and equipment at site, but which SUKOP does not actually operate; and

(b) indirect - which involves a network of retail service stations where SUKOP neither owns nor leases nor operates the site. Rather the retail site is owned/leased, and staffed and operated, by an independent, third party, with SUKOP supplying the dealer with Shell-branded retail fuels and permitting them to use the Shell brand and sell Shell-branded fuels to consumers at the relevant retail site.

5.2.3 There are currently 1,127 Shell Petrol Stations in England and Wales. Approximately 527 are Shell Owned Sites and 600 are Dealer owned sites. At the various petrol stations, fuel storage tanks are usually located under the forecourt which contain significant quantities of flammable fuels - which presents a risk of explosion and fire.

## 5.3 Shell Haven

- 5.3.1 Shell Haven is a critical terminal from which Shell UK picks up products and distributes them between over thirty other terminals. Any action taken by protesters in relation to it therefore has knock on effects, causing disruption to operations, supply and scheduling beyond Shell Haven itself.
- 5.3.2 The Shell Haven terminal is located in Essex and is a large import terminal. It is unique in that its only purpose is the import and distribution of aviation fuel. A significant proportion of the United Kingdom's aviation fuel is imported into Shell Haven where it is stored pending distribution.
- 5.3.3 There are multiple airports 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.

## 6. **INCIDENTS OF DIRECT-ACTION PROTEST AGAINST THE CLAIMANTS AND THE WIDER SHELL BUSINESS**

- 6.1 The Claimants' solicitors, Eversheds Sutherland (International) LLP, have prepared a chronology detailing the incidents which they have been able to identify of instances since April/May 2022 of direct-action protest against the Claimants, the wider Shell business and the wider oil/gas industry and operators within it. A copy of this chronology is exhibited at pages 32 to 906 of **Exhibit CPG1 ("the Chronology")**.
- 6.2 In addition to the Chronology, the Claimants' solicitors have also prepared three further chronologies – being chronologies setting out identified incidents which have occurred since April/May 2022 involving:
  - 6.2.1 protest activity at petrol station sites (some of which are Shell affiliated sites and others which have occurred at other petrol stations across the country which are run by other operators). The incidents are described in more detail in the third witness statement of Ben Austin in the Shell Petrol Station Proceedings;
  - 6.2.2 protest activity at Shell Centre Tower and other corporate buildings (some of which are Shell affiliated and others which are affiliated to other operators within the oil and gas industry). The incidents are described in more detail in the third witness statement of Keith Garwood in the Shell Centre Tower Proceedings; and
  - 6.2.3 protest activity at Shell Haven and other oil refinery sites (some of which are Shell affiliated sites and others which are affiliated to other operators within the oil and gas industry).The incidents are described in more detail in the first witness statement of Fay Lashbrook in the Shell Haven Proceedings.

6.3 It will be appreciated on reviewing these chronologies that a large number of incidents have been identified.

6.4 In this witness statement I focus particular attention on the incidents outlined in the Chronology – being those broader incidents which have occurred since April/May 2022 of general direct-action protest against the Claimants, the wider Shell business and the wider oil/gas industry and operators within it. These are outlined below.

6.5 Before turning to these, however, and so as to provide a general overview of the overall direct action which the Claimants, the wider Shell business and the wider oil/gas industry and operators within it have been subjected to since April/May 2022, I wish to summarise the key specific incidents referred to within the accompanying statements referred to at paragraph 6.2 above.

6.5.1 Petrol Station Sites

6.5.1.1 On 24 August 2022, protestors disrupted operations at three separate service stations on the M25: vandalising fuel pumps, supergluing themselves to the forecourt and blocking customers' access to the forecourt and fuel pumps.

6.5.1.2 On 26 August 2022, 51 Just Stop Oil protestors disrupted operations at seven petrol stations across London: vandalising fuel pumps and blocking customers' access to the forecourt and fuel pumps.

6.5.2 Corporate Buildings

6.5.2.1 Whilst, as far as I am aware, there have been no instances of unlawful activity during protests held within the vicinity of Shell Centre Tower, it continues to be a prime location for protests. Indeed, there have been a number of peaceful protests within the vicinity of Shell Centre Tower since the Shell Centre Tower Injunction Order was granted – as is more particularly described in the third witness statement of Keith Garwood dated 30 March 2023.

6.5.2.2 Personally, I think that the injunction in respect of Shell Centre Tower has had a deterrent effect - given the absence of unlawful protest and the fact that corporate buildings more broadly have been the target of unlawful activity by protest groups since it was ordered. In relation to the later, I am aware that:

- (a) prominent buildings and venues across London have since been targeted - as shown in the following video posted by Just Stop Oil: <https://www.youtube.com/watch?v=ubdLEY96Y18>;
- (b) various government and high-profile buildings (such as a Rolex Shop, high-end car dealerships) have also been targeted by protest groups (as I describe in further detail below); and
- (c) perhaps of most direct relevance, on 14 November 2022, Just Stop Oil supporters targeted the Silver Fin building in Aberdeen – covering it in orange paint. The Shell group of companies have offices in this building and the headquarters of Barclays Bank in Aberdeen are also located within it.

I provide further detail on these and other incidents below.

### 6.5.3 Oil Refinery Sites

- 6.5.3.1 In August and September 2022, protesters targeted the operations of a number of oil refineries located in Kingsbury, Warwickshire. The main road used to access the site was closed as a result of protestors making the road unsafe by digging and occupying a tunnel underneath it. Access roads were also blocked by protestors forming a sit-down roadblock.
- 6.5.3.2 On 28 August 2022, eight people were arrested after protestors blocked an oil tanker in the vicinity of Grays Oil terminal in West Thurrock – protestors climbed on top and deflated the tanker’s tyres.
- 6.5.3.3 In August/September 2022, protesters occupied a tunnel dug under a road in Grays, a road which ultimately serves as access to Grays Oil Terminal in West Thurrock, with the aim of disrupting the terminal’s operations.
- 6.5.3.4 On 14 September 2022, c.50 protestors acted in breach of an injunction obtained by North Warwickshire Borough Council by protesting in an unlawful manner outside of Kingsbury Oil Terminal.
- 6.5.3.5 On 14 February 2023, activists associated with XR blocked access to a private jet terminal at Luton Airport.

6.6 In relation to broader incidents of direct-action protest against the Claimants, the wider Shell business and the wider oil/gas industry and operators within it, I am aware that:

- 6.6.1 Just Stop Oil issued a call in May 2022 for the seizure of Shell's assets (as well as BP's) – *"let's face it, a windfall tax will not solve the cost of living crisis or help stave off climate collapse. It is time for a more radical solution to the intersecting crises we face. We should seize the assets of Shell, BP and other climate criminals and use them to cut energy bills and fund a fair transition to net zero including renewables, insulation and free public transport. Anything less is throwing our young people, the fuel poor and the global south under a bus"* – ([Windfall tax: we don't need crumbs from the oil industry's table we need to take away their lunch – Just Stop Oil](#)).
- 6.6.2 protestors targeted Shell's annual shareholder meeting in May 2022 – disrupting it with shouts of *"we will, we will stop you"* to the tune of the Queen song We Will Rock You and with protestors gluing themselves to chairs and parts of the building hosting the AGM (the Methodist Central Hall in Westminster) and (according to the news article) telling shareholders *"we will dismantle you"* ([Three arrested after activists storm Shell shareholder meeting chanting 'we will stop you' | ITV News London](#) and [XR activists hijack Shell AGM in London disguised as shareholders | Daily Mail Online](#)).
- 6.6.3 on 13 June 2022, Just Stop Oil activists sprayed red paint on the Treasury building protesting against the government's plans to give the green light to new oil and gas projects ([Treasury sprayed with red paint in protest against oil and gas plans - Global Energy News \(energynewsline.co.uk\)](#)) – the article states that *"according to Just Stop Oil campaigners, the symbolic move aimed at showing that the government has blood on its hands. They claim that this action was prompted by the approval of Shell's Jackdaw North Sea gas field two weeks ago. The group also said that the demonstration was also triggered by the Chancellor's announcement of a new tax credit to encourage oil and gas investment"*.
- 6.6.4 on 27 June 2022, XR protestors occupied the central lobby of the Westminster building and unveiled a sign reading *"G7 pay your climate debt"* ([Extinction Rebellion storms Parliament as eco-activists hold protest INSIDE building | Politics | News | Express.co.uk](#)).
- 6.6.5 on 3 July 2022, five Just Stop Oil supporters disrupted the British Grand Prix at Silverstone by invading the track and sitting down ([Just Stop Oil supporters invade the track at Silverstone disrupting the British Grand Prix – Just Stop Oil](#)).
- 6.6.6 on 4 July 2022, two Just Stop Oil protestors glued themselves to the frame of a painting by John Constable (the Hay Wain (1821)) at the National Gallery; having first attached their own version of the painting – which Just Stop Oil described as an *"apocalyptic vision of the future"* that depicts *"the climate*



*collapse and what it will do to this landscape*". It was reported that there was damage to the frame and disruption to the surface of the varnish on the painting ([Climate protesters glue themselves to John Constable masterpiece - BBC News](#)).

6.6.7 on 31 July 2022, more than 20 climate protesters entered a restricted area of the Port of Aberdeen to protest the fossil fuel industry ([Climate activists stage 'mass trespass' into Port of Aberdeen to protest fossil fuel industry - Aberdeen Live](#)). The article notes that the group were protesting against the then recently approved Cambo oil field (which is a prospective oil and gas field in the North Sea, 125 kilometres north west of the Shetland Islands, Scotland) and the Jackdaw oil fields (which is a gas and condensate field proposed to be developed in the North Sea, United Kingdom and operated by Shell).

6.6.8 in October 2022, Just Stop Oil engaged in a month-long campaign of civil disobedience and protest – a chronology of the 'events' making up this campaign is exhibited at pages 399 to 568 of **Exhibit CPG1**. In high-level terms, however, they involved:

6.6.8.1 the blockading of various roads across the country (with instances of protestors supergluing themselves to the surface of roads and suing lock-ons), causing disruption to road users at large on multiple days;

6.6.8.2 two supporters of Just Stop Oil throwing soup over Vincent Van Gogh's *Sunflowers* at the National Gallery ([Just Stop Oil supporters throw soup over Van Gogh's Sunflowers to demand no new oil and gas. – Just Stop Oil](#)) on 14 October;

6.6.8.3 two Just Stop Oil protestors scaling the Queen Elizabeth II Bridge on 17 October 2022, causing it to be shut for 24 hours ([Day 17: Just Stop Oil supporters defy gravity by climbing the QE2 Bridge forcing police to close the bridge – Just Stop Oil](#));

6.6.8.4 Just Stop Oil protesters spraying orange paint on the front of Harrods in central London on 20 October ([Just Stop Oil blocks Knightsbridge and spray paints Harrods on 20th day of action in the capital – Just Stop Oil](#));

6.6.8.5 on 24 October, two Just Stop Oil protestors covering Madame Tussauds' waxwork model of King Charles III with chocolate cake at the waxworks museum ([Day 24: Just Stop Oil cakes the King – Just Stop Oil](#));

- 6.6.8.6 on 26 October, Just Stop Oil supporters spraying paint on a number of high end car dealerships in Berkeley Square, London ([Day 26: Just Stop Oil sprays high end car dealers with orange paint – Just Stop Oil](#));
- 6.6.8.7 on 28 October, two Just Stop Oil supporters spraying orange paint from a fire extinguisher over the premises of Rolex in Knightsbridge ([Day 28: Just Stop Oil sprays high end jeweller with orange paint – Just Stop Oil](#)); and
- 6.6.8.8 on 31 October, supporters of Just Stop Oil spraying paint from fire extinguishers on the Home Office, the MI5 building, the Bank of England and The News Building, the headquarters of News UK at London Bridge ([Day 31: Just Stop Oil paint the town orange – Just Stop Oil](#)).
- 6.6.9 On 1 November, a group of Just Stop Oil supporters swarmed towards the entrance to Downing street on Whitehall and attempted to scale the gates. A further group sat down in the road with banners to block Whitehall. Some also glued themselves to the tarmac ([Day 32: Just Stop Oil target Downing Street to demand no new oil and gas – Just Stop Oil](#)).
- 6.6.10 On 7 November Just Stop Oil protestors started a campaign of targeting motorway gantries around the M25 in at least six locations causing police to halt traffic ([Just Stop Oil disrupts the M25 in multiple locations – Just Stop Oil](#)). This continued for a number of days and ended following an announcement on 11 November that Just Stop Oil would halt its campaign of civil resistance on the M25 to “give time to those in Government ... to consider their responsibilities” ([STATEMENT: Just Stop Oil halts M25 actions – Just Stop Oil](#)). I would like to point out:
- 6.6.10.1 that a police officer was injured during the course of this campaign “*in a collision which also involved two lorries at a rolling roadblock*” ([Just Stop Oil protests: Police officer hurt amid M25 disruption - BBC News](#)); and
- 6.6.10.2 the statement made by Chief Constable of Essex Police BJ Harrington who said the protests were “*putting lives at risk*”, and warned “*someone is going to get hurt*” ([Just Stop Oil protests: Police officer hurt amid M25 disruption - BBC News](#)).
- 6.6.11 On 10 November 2022, activists, from XR and Scientist Rebellion, staged blockades at Farnborough airport, in Hampshire, and London Luton airport’s

Harrods terminal on Thursday morning ([Climate activists target private jet airports and demand ban at Cop27 | Environmental activism | The Guardian](#)).

- 6.6.12 On 11 November 2022, an event (Legal Leaders Europe 2022) at which Mr Donny Ching (Legal Director, Shell) was speaking at was targeted by an activist who disrupted a panel session by making a protest speech against Shell.
- 6.6.13 On 14 November 2022, Just Stop Oil supporters covered the Silver Fin building in Aberdeen in orange paint – in which members of the Shell group of companies have offices and in which the headquarters of Barclays Bank are situated ([Just Stop Oil supporters cover Barclays Aberdeen in paint – Just Stop Oil](#)). Whilst it appears that this activity may have been primarily aimed at Barclays, it is clear from a Twitter post from the Just Stop Oil account reporting on the incident that the Shell business was also targeted ([Just Stop Oil on Twitter: "🚒 BREAKING: BARCLAYS BANK AND SHELL HQ DOUSED IN PAINT Just Stop Oil supporters covered the Silver Fin building offices of @Barclays and @Shell UKLtd in Aberdeen in orange paint, in solidarity with @XRebellionUK. #COP27 #A22Network #BetterWithoutBarclays #ClimateChange #M25 https://t.co/Ju9yXiRiaD" / Twitter](#)).
- 6.6.14 On 20 November, two protesters from XR scaled the National Cycling Centre in Manchester to protest British Cycling's partnership with Shell, displaying a banner which read "Get Shell out of British Cycling" and letting off flares. They were joined by more protestors and a samba band on the ground ([Extinction Rebellion target Ineos and British Cycling with protests | Cycling Weekly](#)).
- 6.6.15 On 28 November, 3 Just Stop Oil supporters wearing hi-vis vests walked onto the road at Shepherds Bush Green in west London and proceeded to march slowly in the road, causing traffic delays. The Just Stop Oil article states that police arrested two people for obstruction of the highway ([Just Stop Oil supporters disrupt traffic on London's roads despite government posturing on tougher policing tactics – Just Stop Oil](#)).
- 6.6.16 On 8 December, around 15 Just Stop Oil supporters wearing hi-vis vests walked onto Whitechapel Road, East London and proceeded to march slowly east and then west causing delays to rush hour traffic ([Just Stop Oil supporters disrupt traffic calling for U-turn on coal decision – Just Stop Oil](#)).
- 6.6.17 On 12 December 2022, a protest involving approximately 30 to 40 protestors took place outside Shell Centre Tower which was aimed at targeting Shell's outgoing CEO Ben van Beurden.

- 6.6.18 On 11 January 2023, a group of XR protesters formed a single file human chain along Westminster Bridge, days after promising to quit their public disruptions (<https://www.londonworld.com/news/environment/extinction-rebellion-protesters-human-chain-westminster-bridge-first-non-disruptive-action-3982340>).
- 6.6.19 This article reports that the action officially launched "Extinction Rebellion's '100 Days' campaign – the biggest mobilisation campaign XR has ever undertaken".
- 6.6.20 On 13 January 2023, a Whitehall Industry Group meeting (at which David Bunch (Shell UK County Chair) was interrupted by members of Fossil Free London ([Fossil Free London on Twitter: "From 2010 - 2018, Shell was reported to have dedicated just 1% of its long-term investments to low-carbon energy like wind & solar. We call out their greenwash. It's lies & cover up. Shell trashes the planet. It's who they are, it's what they do. We say: #ShutDownShell https://t.co/x9j1z9j140" / Twitter](https://twitter.com/FossilFreeLondon/status/1614567890123456789)).
- 6.6.21 On 20 January 2023, members of Just Stop Oil blocked a major road in the centre of Sheffield by forming a human blockade with queuing traffic behind them (<https://www.examinerlive.co.uk/news/local-news/live-just-stop-oil-protest-26018845>). A similar 'go slow' march took place in Manchester on 28 January 2023, which brought traffic to a crawling pace across the city centre ([Just Stop Oil stages 'go slow' march in Manchester today – Just Stop Oil](https://www.juststopoil.org/news/just-stop-oil-stages-go-slow-march-in-manchester-today)).
- 6.6.22 On 31 January 2023 four protesters (with a further two protesters later joining on 6 February 2023) representing Greenpeace boarded and began to occupy a moving Shell floating production and storage facility ("FPSO") whilst it was in transit heading for the North Sea. This incident took place at sea and whilst both the FPSO and the vessels initially carrying the protestors were moving independently of each other. As can be appreciated from the available video footage of the initial boarding manoeuvre (<https://www.youtube.com/watch?v=xWinX51quuw>), this was an inherently and exceptionally dangerous action taken by the protestors and in my view it is only by sheer luck that the protestors were not seriously injured or killed in attempting to board the FPSO. The article published by Greenpeace on this action makes it clear that this activity was primarily aimed at the Claimants and the wider Shell group of companies and business in an aim to highlight "... Shell's reckless plans to keep drilling for more fossil fuels" as part of its 'stop drilling start paying' campaign. In an article by the Independent, one of the activists reports "...they had left the main Greenpeace boat early in the morning and used ropes to scale the vessel and platform. "It was a bit of an adventure to get on board," she said, over gusts of Atlantic wind. "But we are well and safe. We have all the equipment we need to keep ourselves safe".

6.6.23 Such actions are obviously incredibly dangerous and raise significant and real health and safety concerns. The incident also highlights the risks and lengths individual activists are still prepared to take against the wider Shell business. A Greenpeace activist stated in the Greenpeace article that *"Shell might think this is the end of our protest but my message to chief executive Wael Sawan is that this is just the beginning"*. A further article released by Greenpeace reported one of the activists involved confirming *"So we will take them on at sea, at shareholder meetings, in the courtroom, online and at their headquarters. We won't stop until we get climate justice. We will make polluters pay."* These articles are exhibited at pages 807 to 827 and 833 to 840 of **Exhibit CPG1** ([How Greenpeace activists occupied a Shell platform heading for a major oil and gas field | Greenpeace UK](#) [Greenpeace climate justice activists board and occupy Shell platform en route to major oilfield with message: 'STOP DRILLING. START PAYING.' - Greenpeace International](#) and <https://www.theguardian.com/environment/2023/jan/31/greenpeace-protesters-board-shell-platform-bound-for-shetland>).

6.6.24 on 2 February 2023:

6.6.24.1 approximately 15 to 20 Global Witness protesters congregated outside Shell Centre Tower to protest against the Shell's Penguins FPSO to be deployed in the Brent Field within the North Sea later this year. Most of them were wearing penguin costumes and distributed leaflets (['Penguins' protest outside Shell's London headquarters | News | Independent TV](#)); and

6.6.24.2 Greenpeace activists set up a mock petrol station price board outside Shell Centre Tower in protest against Shell's profits announced that day ([Greenpeace protests outside Shell HQ in London after record profit announced | Evening Standard](#)).

6.7 The Claimants have been in communication with the police from time to time about JSO's activities and the nature and level of any ongoing threat. Whilst police intelligence cannot be referred to specifically on the basis that such communications are confidential, it is consistent with the conclusion reached on the basis of the evidence referred to in this statement 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.

6.8 It is apparent that JSO continues to have the ability to draw on a large cadre of protestors who are willing to be arrested for protest action, to use a variety of tactics and target locations across the UK and employs tactics which attract high media and public interest. It is also apparent that there is a high level of cross over between the individual protest groups.

6.9 Intelligence further suggests that the high disruptive tactics are likely shared between groups, traction is likely to increase as a result of the government's recent approval of the building of a new power station and as a result of the cost of living crisis which is also likely to increase animosity of JSO towards oil companies. As environmental concerns affect the majority of the public, it is also highly likely that those supportive of JSO will increase in number. There is protestor coverage across the UK and groups clearly have the ability to carry out strategic action nationwide.

6.10 In my view the above incidents demonstrate a clear nationwide targeting of members of the wider Shell group of companies and its business operations since April/May 2022. For the reasons explained further below, I believe that:

6.10.1 such demonstrations will continue for the foreseeable future; and

6.10.2 the injunctions need to remain in place as they provide a strong deterrent effect and mitigate against the risk of harm which unlawful activities at the Shell Sites would otherwise give rise to.

## 7. **HARM CAUSED TO THE CLAIMANTS**

7.1 The Claimants (and I would strongly suspect other third parties) 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. Since the First and Second Defendants started actively targeting oil companies and their assets in this way in March 2022, the Claimants have incurred the following hard costs in connection with the protest activity:

7.1.1 the cost of installing fencing and upgrading the Intrusion Detection System and CCTV system at the Kingston oil terminal at a cost of approximately £135,000;

7.1.2 the cost of engaging additional security officers and installing additional surveillance cameras at Shell Centre Tower; and

7.1.3 in relation to the protest action described at paragraph 6.6.22 specifically, the cost of engaging an additional vessel to shadow the platform as it is in transit.

## 8. **REQUIREMENT FOR A FURTHER INJUNCTION**

8.1 As stated above, the Claimants do not wish to stop protestors from undertaking peaceful protests whether near the Shell Sites or otherwise and I should note that many peaceful protests have taken place at the Shell Sites since the award of the Injunction Orders without breaching their terms – in particular outside and in the vicinity of Shell Centre Tower and outside of shell petrol stations (as more particularly described in the third witness statement of Keith Garwood and the third witness statement of Ben Austin); indicating their effectiveness as a deterrent.

8.2 As is more fully explained in this statement and the accompanying witness statements, unlawful activity at the Shell Sites does present an unacceptable risk of continuing and significant danger to the health and safety of staff, contractors, the general public and other persons visiting them. It is for this reason that the Claimants have decided to make their applications to continue the injunctions beyond their respective expiry dates – in an effort to mitigate against the grave and irreparable risk of harm arising from the Defendants’ activities.

8.3 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:

8.3.1 an article published on Sky News’ website on 30 November 22 records Alex De Koning, a spokesman for Just Stop Oil, as saying:

*that Just Stop Oil will "continue to escalate unless the government meets our demand" to stop future gas and oil projects"; and*

*"If things need to escalate then we're going to take inspiration from past successful movements and we're going to do everything we can. If that's unfortunately what it needs to come to, then that's unfortunately what it needs to come to. We're fighting for our lives, why would we do any less". ([Just Stop Oil considers slashing famous artworks as it threatens to 'escalate' protests | UK News | Sky News](#)).*

8.3.2 on 29 January 2023, a post on twitter by Fossil Free London invites people to a meeting with the accompanying statement of “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. Sign up & help us plot!” (<https://twitter.com/fossilfreeLDN/status/1619375156199309317?cxt=HHwWi oDS9f3HlvksAAAA>).

8.3.3 an article on the LBC (Leading Britain’s Conversation) published on 11 January 2023 ([Just Stop Oil plan new campaign of disruption in 2023 - and could target the King's... - LBC](#)) states that:

*“[Just Stop Oil] has said that because of their ‘success’ in 2022 in ‘getting people talking about the climate crisis’ they plan more large scale disruption this year.*

*The group, which saw over 2,000 arrests in 2022, including 138 protesters ending up in prison, has said that their membership has significantly grown since their large-scale disruptions last year - with more active members.*

*Alex De Koning, a spokesperson for the group, said: "Yes unfortunately we're probably having to do more, because we need more change... and we need it faster... why would we slow down now?"*

*When pressed on whether this meant an increase in days of disruption, or increasing the level of disruption [Alex De Koning] replied, "it could potentially mean both... When two people threw soup at the Van Gough painting, that got more people talking about the climate crisis than when 33 million people in Pakistan got displaced because of the floods".*

*When asked about whether Just Stop Oil could target strike days for their demonstration, Koning said 'potentially', adding the group was in 'full solidarity with strike workers', saying many of its members would 'want to be on the picket lines with them'.*

*Similarly, the group refused to rule out disrupting key events this year, when asked whether the group would target the UK local elections or Kings Coronation, both the 4th & 6th May respectively, the group said, 'it's not being ruled out'.*

*Alex De Koning, a climate scientist with the group, admitted it was 'horrible' that 'people get caught up in this', but claimed he, and his colleagues from the group, would end their action immediately "if the government made a meaningful statement to end all oil and gas in the UK".*

*He added "unfortunately the actions will be disruptive... history has shown that is how change is more likely to happen...if it's not in the public sphere, it's not in the public information".*

8.3.4 in relation to Just Stop Oil, it issued an "ultimatum letter to 10 Downing Street" on 14 February 2023 ([Just Stop Oil youth campaigners deliver ultimatum to Rishi Sunak – Just Stop Oil](#)) – which stated that:

*"Just Stop Oil is demanding that: The UK government makes a statement that it will immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK".*

*If you do not provide such assurance by 10th April 2023, we will be forced to escalate our campaign – to prevent the ultimate crime against our country, humanity and life on earth...*

*We will not be bystanders".*

(A copy of the relevant statement is exhibited at pages 847 to 851 of **Exhibit BA3**).



8.4 These statements strongly suggest to me 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 – in respect of which, the continuation of the injunctions will help minimise (so far as possible – given their deterrent nature) the risk of unlawful protest action taking place and give the police and the Claimants’ the ability to take swift and impactful action if it does.

8.5 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.



.....

Christopher Prichard-Gamble

Dated: 30 March 2023