

Onshore conventional oil & gas call for evidence - FoES response

29 July 2022

About us

Friends of the Earth Scotland exists to campaign, with partners here and across the globe, for a just transition to a sustainable society. We are Scotland's leading environmental campaigning organisation; an independent Scottish charity with a network of thousands of supporters and active local groups across Scotland. We are also part of the largest grassroots environmental network in the world, uniting over 2 million supporters, 75 national member groups, and some 5,000 local activist groups – covering six continents.

Summary of key points

FoES welcomes the opportunity to respond to the Scottish Government's call for evidence to inform the development of a policy on onshore conventional oil and gas extraction as part of the revision of the current energy strategy, and the development of a just transition plan for the energy sector.

Tackling the climate crisis has never been more urgent. In the 5 years since the current energy strategy was finalised, climate science and the reality of climate impacts around the world have made it clear that nothing short of a transformation of the economy and the energy systems it depends on is required to avoid catastrophic warming. The solutions are clear: we must end the expansion of new fossil fuels and leave much of existing reserves in the ground, rapidly and justly transitioning to a system powered by renewables with a reduced demand for energy.

The exploration for and development of any new fossil fuels, including onshore conventional oil and gas (and coal, which we deal with in our response to the separate call for evidence) in Scotland, is fundamentally incompatible with both the global goal of limiting warming to 1.5°C, and Scotland's national target of net zero emissions by 2045 and the urgent interim target for 2030.

The Scottish Government has already positioned itself in opposition to unlimited oil and gas extraction, extending the moratorium on fracking indefinitely in 2019 and ending its support for Maximum Economic Recovery of North Sea oil and gas in 2021. A ban on all new licences for onshore conventional oil and gas in Scotland (and on planning permission for coal extraction) is a logical next step as part of a managed phase out of all fossil fuels, and one that the Scottish Government has the power to take now.

This year's revision of Scotland's Energy Strategy, combined with the development of a Just Transition Plan for the energy sector, comes at a critical time in the fight to avoid climate

breakdown. The strategy covers the crucial years to meeting Scotland's 75% emissions reduction target by 2030, and out to 2050, by which time Scotland is expected to have been at net zero emissions for five years.

Therefore it is essential that the new Energy Strategy and Just Transition Plan (ESJTP) sets out a comprehensive strategy for a managed and just phase out of the extraction and use of fossil fuels. **A position of no support for onshore conventional oil and gas extraction in the new ESJTP must therefore be adopted, and enforced through the licensing regime and the new National Planning Framework 4.**

Climate breakdown and fossil fuels

Since the release of the current Energy Strategy in December 2017, there have been significant developments both in the impacts of the climate crisis around the world, and in the scientific consensus on how to mitigate the crisis. The Intergovernmental Panel on Climate Change (IPCC) has identified this decade as our last chance to make the “rapid and deep emissions reductions”¹ required to limit warming to 1.5°C, with global greenhouse gas emissions required to peak in 2025 in order to remain within this limit.

Since the Industrial Revolution, global average temperatures have risen by approximately 1.1°C, causing significant impacts to global weather systems, ecosystems and human life. Climate science is clear that to remain within the limits of the Paris Agreement, which commits nations “to pursue efforts to limit the temperature increase to 1.5°C”, there can be no new fossil fuel exploration, production or development and that production must begin to decline now and continue to be phased out over the coming decade in the wealthiest nations.

The International Energy Agency (IEA) report, '*Net Zero by 2050: A Roadmap for the Global Energy Sector*', states that to reach global net zero by 2050 there is "no need for investment in new fossil fuel supply" and there should be “no new oil and gas fields approved for development”². Further, the Working Group III contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change noted this year that “if investments in coal and other fossil fuel infrastructure continue, energy systems will be locked-in to higher emissions making it harder to limit warming to 2°C or 1.5°C”³.

UN Secretary General Antonio Guterres said that the recent IPCC report “must sound a death knell for coal and fossil fuels, before they destroy our planet. Countries should end all new fossil fuel exploration & production”.⁴

In June this year, a UN Summit - Stockholm 50+ - has for the first time recommended a "phase out of fossil fuels while providing targeted support to the poorest and most vulnerable

¹ https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_FinalDraft_FullReport.pdf

² <https://www.iea.org/reports/net-zero-by-2050>

³ https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_FinalDraft_FullReport.pdf

⁴ [UN Secretary-General Statement](#) on new IPCC report

in line with national circumstances and recognizing the need for financial and technical support towards a just transition."⁵

However, the United Nations Environment Programme 2021 Production Gap report shows that the world's governments are on track to produce 110% more fossil fuels in 2030 than would be consistent with limiting warming to 1.5°C, and 45% more than would be consistent with limiting warming to 2°C⁶. The report finds that "global fossil fuel production must start declining immediately and steeply to be consistent with limiting long-term warming to 1.5°C."

The UNFCCC enshrines the principle of common but differentiated responsibilities, meaning that wealthy countries like Scotland and the UK who have done most to cause the climate crisis should cut emissions faster than the global average, to give those countries with low historic emissions more time to decarbonise. As a country with historically high emissions, and relatively low dependence on revenue from oil and gas exports, Scotland has a duty to be among the first to equitably phase out fossil fuel extraction and demand in order to reduce emissions rapidly.

The recent *Phase out Pathways for Fossil Fuel Production* report by the Tyndall Centre for Climate Research has calculated equitable phase out dates for oil and gas producing countries, and finds that for a 67% chance of limiting warming to 1.5°C, the UK and other rich nations must end oil and gas production by 2031⁷. We would add that the report highlights that simply ending production is no longer enough. The UK and other rich nations must provide "substantial and ongoing financial transfers to poorer nations to facilitate their low-carbon development, against a backdrop of dangerous and increasing climate impacts."

Awarding new licences for exploration and extraction of onshore conventional oil and gas in Scotland is therefore entirely incompatible with our international obligation to limit temperature rises to the 1.5°C limit, locking us into a high level of future greenhouse gas emissions.

Already, alliances have formed between global 'first movers' such as Denmark, Ireland and Costa Rica, who have ended support for all new fossil fuel extraction within their territories⁸. It is Scotland's obligation through common but differentiated responsibility, as a country that has historically benefitted hugely from burning fossil fuels, to join these first movers in rapidly and equitably phasing out new extraction of onshore conventional oil and gas.

Energy Security

The dramatic rises in the prices of oil and gas, compounded by the reductions in supplies as a result of the war in Ukraine, have demonstrated the failings of our broken energy system.

⁵ UN Stockholm 50+ [Key recommendations for accelerating action towards a healthy planet for the prosperity of all](#)

⁶ <https://productiongap.org/2021report/>

⁷ [https://www.research.manchester.ac.uk/portal/en/publications/phaseout-pathways-for-fossil-fuel-production-within-pariscompliant-carbon-budgets\(c7235a8e-e3b1-4f44-99de-c27958c03758\).html](https://www.research.manchester.ac.uk/portal/en/publications/phaseout-pathways-for-fossil-fuel-production-within-pariscompliant-carbon-budgets(c7235a8e-e3b1-4f44-99de-c27958c03758).html)

⁸ <https://beyondoilandgasalliance.com>

What is unfolding now is not solely the result of the Russian invasion, or any other one event. This current energy price crisis is a symptom of the inherent volatility of the international oil and gas market and the heightened exposure of Scotland and the UK to this volatility due to our reliance on fossil fuels. The oil and gas extracted on our shores and in our waters belongs to the companies extracting it, and is sold on the open market to the highest bidder. This does nothing to bring down domestic energy prices or satisfy domestic demand. The solution to this crisis lies not in increasing domestic extraction of oil and gas, but in phasing out fossil fuels altogether, and transitioning to a system driven by energy efficiency and domestically produced renewables.

Just Transition

Ensuring that oil and gas workers are fully supported in the transition away from fossil fuels is of the utmost importance and should be a core element of the new Energy Strategy. Workers across high-carbon industries must be supported to gain training and employment in other sectors, such as the renewables industry. Research conducted by Friends of the Earth Scotland and Platform London has found that 81% of oil and gas workers would consider leaving the oil and gas industry to work in another sector⁹. Fundamental to securing a Just Transition is clarity of the changes to take place and consistency in approach. Fossil fuel production and demand must decline rapidly and it is important that the Scottish Government is focused on ensuring there are pathways and opportunities for those in these industries today to move across. Pursuing the expansion of fossil fuels, whether in conventional onshore extraction or elsewhere, creates carbon lock-in and undermines the wider strategy needed to ensure a well-managed phase-out of the fossil fuel industry. It is vital that the Scottish Government works with trade unions and oil and gas workers to ensure that the transition away from fossil fuel extraction does not come at the expense of workers' livelihoods.

However, given there is currently no onshore oil and gas production in Scotland there will be no impact on workers from a policy of no support for conventional onshore oil and gas extraction.

Scottish Government policy on fossil fuel extraction

Scottish Government policy on fossil fuel extraction is starting to move in the right direction in terms of responding to the climate crisis.

In October 2017, the Scottish Government announced its position of no support for unconventional oil and gas extraction (fracking), following a consultation in which 99% of respondents were opposed to fracking. In October 2019, the Scottish Government confirmed its position on fracking, announcing its intention to implement an indefinite moratorium on the unconventional extraction of oil and gas by including the position in the National Planning Framework, and exercising newly devolved licensing powers in line with the position.

⁹ <https://foe.scot/wp-content/uploads/2020/09/Oil-Gas-Workers-Report-Final.pdf>

In his statement to Parliament announcing the confirmation of the policy, then Energy Minister Paul Wheelhouse explicitly cited climate change as a key part of the Government's reasoning: "We considered carefully how support for the development of onshore unconventional oil and gas sits with our policies on climate change, energy transition and the decarbonisation of our economy. We have concluded that it is incompatible."¹⁰

The climate grounds for opposition to onshore unconventional oil and gas extraction also apply to onshore conventional oil and gas. Therefore the Scottish Government should similarly adopt a position of no support for onshore conventional oil and gas extraction in the new ESJTP, enforced through the licensing regime and the new National Planning Framework 4, for a consistent policy to limit warming to 1.5°C.

The Programme for Government 2021/22 states that "unlimited extraction of fossil fuels is incompatible with our climate obligations and meeting the aims of the Paris Agreement"¹¹. This signals a significant shift from the Government's previous policy of maximising the economic recovery of North Sea oil and gas by pledging to support the extraction of the 20 billion barrels of oil remaining in the UK Continental Shelf.

In October 2021, the First Minister announced that the Scottish Government would end its support for the Maximum Economic Recovery of North Sea oil and gas, recognising that "the necessity of accelerating the transition away from fossil fuels could not be clearer".¹² Sturgeon's subsequent public opposition to the proposed Cambo oil field off the coast of Shetland further cemented this new policy direction. Since then, the First Minister, backed up by the independent Climate Change Committee, has called for all new offshore oil and gas projects to be subjected to "robust" climate tests - and has extended this condition to projects which have already been licenced but have not yet entered the development phase, such as the controversial Jackdaw gas field which was approved by the UK Government in June 2022. In reality, a truly "robust" climate test should not allow the licensing of any new oil and gas extraction, as to stay below 1.5°C of warming it is clear that we must implement a managed phase out of all oil and gas extraction as soon as possible.

¹⁰ <https://www.gov.scot/publications/unconventional-oil-gas/>

¹¹ <https://www.gov.scot/publications/fairer-greener-scotland-programme-government-2021-22/>

¹² <https://www.gov.scot/news/unlimited-recovery-of-hydrocarbons-not-sustainable/> and <https://www.gov.scot/publications/first-ministers-speech-scotlands-priorities-cop26/>