



July 10, 2021

The Rt Hon Kwasi Kwarteng MP
Secretary of State for Business, Energy and Industrial Strategy
Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
Department for Business, Energy and Industrial Strategy
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

By email to: BST@beis.gov.uk

Re.: **D/4261/2021** (Cambo Field Development)

Dear Rt Hon Kwarteng:

We write to urge your resolute rejection of any Oil and Gas Authority (OGA) grant of consent to the Cambo offshore oil and gas exploration, production, unloading and storage project.

Cambo lies less than 16 miles to the west of the Shetland Islands in the North Sea. We live in the United States, some thousands of miles distant. And yet we write nonetheless, since the greenhouse gas emissions that would result from Cambo approval will injure our children and their progeny no less than those in Scotland.

Simply put, this vast fossil fuel expansion cuts sharply against the fundamental requirement of humanity in the present time. To restore [Earth's Energy Balance](#)¹ and avoid irretrievable regional and global impacts, we must restore and protect our climate system. And that, in turn, requires us to phase out GHG emissions and remove a substantial share of legacy emissions.

Accordingly, you must refuse the proposed OGA grant of consent for Cambo.

¹ Schuckmann et al, Heat stored in the Earth system: where does the energy go?, *Earth Syst. Sci. Data*, 12, 2013–2041, <https://doi.org/10.5194/essd-12-2013-2020>. See also, Hansen, J., M. Sato, P. Kharecha, and K. von Schuckmann, 2011: Earth's energy imbalance and implications. *Atmos. Chem. Phys.*, **11**, 13421-13449, doi:10.5194/acp-11-13421-2011. <https://acp.copernicus.org/articles/11/13421/2011/acp-11-13421-2011.html>.

We have reviewed a copy of a letter to you of this same date filed by a broad coalition of environmental groups, including ClientEarth, Uplift, and Friends of the Earth England, Wales, Northern Ireland, and Scotland. [Hereinafter, “FOE letter.”] We appreciate their detailed treatment, and we incorporate their analysis by reference here. But we hasten to add two points.

First, the very fact that Royal Dutch Shell and its cohorts continue to press for projects like Cambo serves to highlight the fundamental inadequacy of international and national climate safeguards. In particular, in our considered view, unless the price of fossil fuels soon reflects their full imposition on human health and the environment – including their jeopardy of our children and *their* future – then we will confront Cambo after Cambo after Cambo, in the UK and elsewhere. Accordingly, we urge you also to take time to consider how you might help reorient present domestic and international market structures so as to ensure the rapid phaseout of fossil fuels. See [here](#) for some of our similar recent and current advocacy with the US Administration.²

Second, we urge you to consider your Cambo decision in light of several fundamental features of our planet’s major systems.

(a) In considering Cambo, please consider the potential impact to Earth’s major ice sheets, Antarctica in particular, and the induced risk of nonlinear sea level rise – that is, multi-meter SLR on order of several decades – from continued high emissions. Undersigned Dr. Hansen and colleagues in particular have attempted to call this ultimate risk to the attention of the relevant climate scientific community and policymakers, and we take this opportunity here also to do this with you. Please see Hansen et al (2016) [here](#) for a comprehensive review.³ Relevant here, that group noted that “[t]he economic and social cost of losing functionality of all coastal cities is practically incalculable.” *Id.*

(b) In considering Cambo, consider also the potential impact of heatwaves on the habitability of regions that are not immediately cooled by the ocean. For instance, numerous communities in the normally moist and cool North American Pacific Northwest have experienced off-the chart record heat, and heat-related death, in recent weeks. The scientific community is struggling to quantify with precision the rarity of this heatwave, and yet a group of them, having undertaken a rapid attribution study, have been able to assert that this heatwave

² Hansen/ Galpern letter to the President urging him to: “make full use of a powerful tool already at your disposal to accelerate the necessary decarbonization of our power, industrial, agricultural, and transportation systems. That is [to] direct EPA to . . . impose a revenue-neutral carbon fee,” via invocation of “the Independent Offices Appropriation Act (IOAA), 31 U.S.C. §9701.” Also, “Petition to President Biden: Impose a Rising Fee on Carbon Pollution Without Delay,” describing a carbon fee and dividend program as a “highly cost-effective means of securing [the critical national climate goals](#)” that the President established, including 100 percent carbon pollution-free electricity by 2035, deep reductions in transportation and industrial sectors emissions, and improved public health. See [CPRclimate.org](#).

³ Hansen, et al., Ice melt, sea level rise and superstorms: evidence from paleoclimate data, climate modeling, and modern observations that 2 °C global warming could be dangerous, *Atmos. Chem. Phys.*, 16, 3761–3812, 2016. <https://acp.copernicus.org/articles/16/3761/2016/acp-16-3761-2016.pdf>

would have been “*virtually impossible* without human-caused climate change” (emphasis added) and that, as warming continues, it will become a lot less rare.”⁴

We also understand from the FOE letter that the Executive Director of the IEA has warned that such projects “*might contradict with,*” the UK’s climate goals and that, similarly, the UK Climate Change Committee, has advised Parliament that approval of such projects might “*send mixed messages and could undermine public buy-in* to the Net Zero transition.” [Emphasis added.]

We read these as extraordinary, if perhaps typically British, understatement, requiring immediate correction so as to see things for what they are:

Approval of Cambo, with its additional 16-18 coal-fired power plants’ worth of carbon emissions,⁵ does not *potentially* conflict with, but rather directly conflicts with the climate goals of the UK -- and indeed that of all nations that are party to the United Nations Framework Convention on Climate Change.

Likewise, Cambo approval would not “*send [a] mixed message*” and potentially “*undermine public buy-in*” to any meaningful decarbonization effort. Rather, it directly undermines such “*buy-in*” and, moreover, sends one clarion message: “Your government cares not a whit about your children’s future.”

This cannot stand. But, as we understand it, the decision is now in your hand.

Mr. Rt Hon Kwarteng, we urge you to do the right thing.

Sincerely yours:



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*To whom inquiries regarding this letter should be sent.

⁴ Philip et al., Rapid attribution analysis of the extraordinary heatwave on the Pacific Coast of the US and Canada June 2021, World Weather Attribution, <https://www.worldweatherattribution.org/western-north-american-extreme-heat-virtually-impossible-without-human-caused-climate-change/>.

⁵ Text accompanying footnotes 15 and 16 of the FOE letter.