Docusign Envelope ID: ADCF4C9D-3248-8F12-804A-64DAEA92F399

Party: Claimant
Witness: John Michael Armstrong
Number: Eight
Exhibit: UKOP20
Dated: 16 November 2026

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2022-000303**

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

BUSINESS AND PROPERTY DIVISION

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)

First Defendant / Respondent

(2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendant / Respondent

EIGHTH WITNESS STATEMENT OF

JOHN MICHAEL ARMSTRONG

Docusign Envelope ID: ADCF4C9D-3248-8F12-804A-64DAEA92F399

I, John Michael Armstrong, of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire will say as follows:

1. I currently act as the Director and General Manager of British Pipeline Agency Limited ("**BPA**") and have held this role since 1 September 2021. I have worked for BPA since July 2020 and, prior to becoming a Director and General Manager, I was the Chief Operating Officer of BPA. Prior to that, I enjoyed senior roles across distributed energy, power generation and engineering safety.

2. BPA is the UK's leading provider of engineering and operational services to the oil and gas pipeline sector. It has operated UK onshore pipelines and terminal facilities for over 50 years, currently managing over 1,000km of fuel pipes in the UK.

3. BPA acts as agent for the First Claimant, United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant, West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. I make this statement from facts within my own knowledge, which I believe to be true. Where I refer to matters not within my knowledge, I confirm that they are true to the best of my knowledge, information and belief, and I state the source of the information.

6. Produced and shown to me is a bundle of documents containing exhibit "**UKOP20**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.

7. Unless otherwise stated, in this statement I adopt the definitions set out in my first witness statement dated 7 April 2022.

CURRENT POSITION

8. On 12 April 2022, Peter Knox QC (sitting as a Judge of the Chancery Division) granted an interim injunction to restrain the Defendants from trespassing, causing damage or removing equipment from the Sites and / or obstructing or otherwise interfering with the First Claimant's access over private access roads at the Sites (the "**Interim Injunction**"). On 21 April 2022, the Injunction was extended until 20 April 2023 (together, the "**April 2022 Orders**").

9. On 21 April 2023, the Injunction was extended by Order of The Honourable Mr Justice Rajah (the "**April 2023 Order"**), until:

   (a) 20 October 2023;

   (b) final determination of the claim; or

   (c) further claim in the interim.

10. On 6 October 2023, Mr Simon Gleeson (sitting as a Judge of the Chancery Division) granted an Order (the "**October 2023 Order**") for final injunctive relief to restrain the same activities prohibited by the Interim Injunction (the "**Final Injunction**").

11. It was also Ordered, pursuant to paragraph 12 of the October 2023 Order, that there shall be, on or around the anniversary of the October 2023 Order (being 6 October each year) a hearing to review the Final Injunction granted therein.

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12. On 20 November 2024, at the first annual review of the October 2023 Order, by the Order of The Honourable Mr Justice Miles, the Final Injunction was continued (the "**November 2024 Order**").

13. Pursuant to the November 2024 Order:

    (a) any requirement in the April 2022 Orders and / or the April 2023 Orders on the Claimants to continue to fix copies of documents in clear transparent containers, by way of alternative service, was dispensed with;

    (b) paragraph 6(b) of the October 2023 Order was amended such that, prospectively, the Claimants be permitted to affix copies of the October 2023 Order in clear envelopes (in substitution for sealed transparent containers) to the perimeter fencing or gates at a minimum number of 2 prominent locations at each of the Sites; and

    (c) the November 2024 Order was to be served pursuant to the steps set out in paragraphs 9-11 of the October 2023 Order.

11. The second annual review of the October 2023 Order took place on 13 November 2025. By the Order of Master Kaye, the Final Injunction was continued, and the Claimants' application dated 24 October 2025 in relation to the description of the Defendants was granted (the "**November 2025 Order**").

12. Pursuant to the November 2025 Order:

    (a) the Claimants were permitted to amend the Claim Form and the Particulars of Claim to change the description of the First and Second Defendants (the "**Amended Claim Form and Particulars of Claim**");

    (b) service of the Amended Claim Form and Particulars of Claim was dispensed with;

    (c) the October 2023 Order was amended in the form appended at Schedule 2 to the November 2025 Order (the "**Amended October 2023 Order**");

    (d) the Amended October 2023 Order was to be notified to the First and Second Defendants in accordance with paragraphs 6 to 8 of the Amended October 2023 Order; and

    (e) the November 2025 Order was to be notified to the First and Second Defendants in accordance with paragraphs 9 to 11 of the Amended October 2023 Order

13. I make this further statement in connection with the third annual review hearing of the Final Injunction granted by the Amended October 2023 Order.

14. For the reasons I refer to below, the Claimants consider that the Final Injunction should remain in place until 23:59 hrs on 20 October 2028, subject to the annual reviews provided for at paragraph 12 of the Amended October 2023 Order.

15. This eighth witness statement supplements:

    (a) my first witness statement dated 7 April 2022 ("**First Witness Statement**");

    (b) my second witness statement dated 14 April 2022 ("**Second Witness Statement**");

    (c) my third witness statement dated 5 April 2023 ("**Third Witness Statement**");

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(d) my fourth witness statement dated 6 July 2023 ("**Fourth Witness Statement**");

(e) my fifth witness statement dated 22 September 2023 ("**Fifth Witness Statement**");

(f) my sixth witness statement dated 4 November 2024 ("**Sixth Witness Statement**"); and

(g) my seventh witness statement dated 24 October 2025 ("**Seventh Witness Statement**")

together my "**Previous Witness Statements**".

16. The purpose of this eighth witness statement is to provide the Court with an update in respect of relevant events following the grant of the November 2025 Order and since my Seventh Witness Statement and, ultimately, to demonstrate the continuing threat posed by the Defendants. It therefore addresses:

(a) pertinent developments that evidence the continuing threat posed by the Defendants;

(b) evidence of action targeted at other operators and / or other organisations affiliated with the oil and gas sector; and

(c) evidence that shows that the Final Injunction has been successful in restraining individuals from potentially causing disruption to the Sites (as such term is defined in Schedule 2 of the Amended October 2023 Order).

NOTIFICATION OF THE NOVEMBER 2025 ORDER AND AMENDED OCTOBER 2023 ORDER

17. I have reviewed the Sixth Witness Statement of Antony Phillips dated 19 January 2026 and understand that steps were taken following the second annual review hearing to notify the Defendants of the November 2025 Order and Amended October 2023 in accordance with the terms of those orders.

DIRECT ACTION IN THE VICINITY OF SITE 1 AND SITE 2

18. In my First Witness Statement and Second Witness Statement, I addressed in detail the direct action suffered by the Claimants in respect of Site 1 and the direct action targeted at the operations of the Claimants in close proximity to Site 1 and Site 2. This direct action formed the basis for the Claimants seeking an initial interim order for pre-emptive injunctive relief.

19. In my Third Witness Statement, I addressed the further incidents of direct action in close proximity to Site 2 since the April 2022 Orders.

20. In my Sixth Witness Statement, I outlined that there had been no further direct action at, or in the vicinity of, Site 1 and Site 2 since the date of my Third Witness Statement. I refer to paragraphs 17 and 18 of my Sixth Witness Statement, which set out a number of factors which I believe contributed to the reduction in direct action in the vicinity of the Sites and refer further to paragraph 26 of my Seventh Witness Statement which outlines the earlier statement made by Just Stop Oil, suggesting that it planned to end disruptive protests **[UKOP17: pages 19-21].** I continue to believe that the Final Injunction has been the most significant factor in minimising the risk of a future trespass and / or interference occurring at either Site and remains the strongest deterrent against future direct action, the relief granted having proved successful to date.

21. At paragraph 19 of my Seventh Witness Statement, I outlined that the other factors which I believe contributed to the reduction in direct action in the vicinity of the Sites included the continuing

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existence of an injunction order made by Mr Justice Sweeting in the King's Bench Division dated 9 May 2022 in favour of North Warwickshire Borough Council ("**NWBC**") (the "**NWBC Order**"). The NWBC Order protects the locality of the Kingsbury Oil Terminal (of which Site 2 forms part). I understand that at the second annual review of the NWBC Order heard on 7 October 2026, HHJ Emma Kelly noted that if individuals are minded to take direct action or other protest activity, the Kingsbury Oil Terminal (of which Site 2 forms part) would remain a prominent target. As a result, the NWBC Order has continued in full force and effect.

22. In light of the recent developments outlined in this statement, I believe that, if any of those factors I have referred to in my Previous Witness Statements were to be removed, the direct action would re-start, to the detriment of the Claimants and Site 1 and Site 2.

EVIDENCE OF ACTION BY JUST STOP OIL AND EXTINCTION REBELLION INCLUDING TARGETING OF OTHER OPERATORS AND AFFILIATED ORGANISATIONS FROM 24 OCTOBER 2025 TO 16 NOVEMBER 2026

23. Since the date of my Seventh Witness Statement, whilst there has been a marked change in the activities of Just Stop Oil, there continues to be activity targeted at industries and organisations that members of Just Stop Oil and / or Extinction Rebellion consider to be affiliated to the oil and gas industries. I have set out further detail of the activities of Just Stop Oil and Extinction Rebellion below.

JUST STOP OIL

24. On 27 March 2025, Just Stop Oil announced its plans to end disruptive protests and re-strategise its resistance efforts after a final demonstration on 26 April 2025 **[UKOP17: pages 19-21].** However, the extent to which Just Stop Oil had actually ceased its activities in the lead up to the second review hearing was unclear with a number of contradictory statements made on behalf of and / or by Just Stop Oil as outlined at paragraph 25 - 27 of my Seventh Witness Statement. Those previous statements suggested that the Just Stop Oil campaign was a continuing campaign notwithstanding the announcement of March 2025 which suggested that the group were "*hanging up the hi-vis*" and ceasing their activities **[UKOP17: pages 19-21]**.

25. At paragraph 27 of my Seventh Witness Statement, I referred to the fact that I was aware that the Court has been referred to the announcement by Just Stop Oil that it intended to stop disruptive protests in a number of recent cases where the continuation of injunctions against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil, and / or Insulate Britain campaigns had been sought. The judgments recorded that the Court determined in each case that the announcement by Just Stop Oil did not demonstrate that there was no longer a threat from Just Stop Oil or other environmental campaign group and that a real risk of unlawful activity would subsist if the respective injunctions did not remain in place. I referred, at paragraph 27(a) to (d) of my Seventh Witness Statement to the observations made by the Court in that regard and at paragraph 28 of my Seventh Witness Statement to a summary of the outcome of the hearings I referred to where the Court had determined that there remained a threat. At paragraph 29 of my Seventh Witness Statement, I also referred the Court to a number of statements made by activist members, including members of Just Stop Oil, where these members had acknowledged the utility of direct action and a willingness to do the same again.

26. As is evident from the making of the November 2025 Order, the Court was satisfied at the second annual review hearing that the announcement by Just Stop Oil did not demonstrate that there was no longer a threat from Just Stop Oil or other environmental campaign groups and a real risk of unlawful activity would subsist if the injunctions granted by the Court did not remain in place.

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27. Following the making of the November 2025 order, further statements were made by Just Stop Oil suggesting a turning away from direct action. In particular, I understand, having reviewed the evidence published in relation to (*1) ESSO Petroleum Company, Limited and (2) Exxonmobil Chemical Limited v Persons Unknown*, that on 28 April 2026, Just Stop Oil issued a mass email to its members and followers stating that "*Just Stop Oil has hung up the hi-vis, but there's still plenty going on in the wider movement*" **[UKOP20: pages 5-6].**

28. Similarly, in an article published by Just Stop Oil on 17 July 2026, a Just Stop Oil spokesperson is quoted as saying "*Just Stop Oil may have ceased action but others are continuing the flight [sic] against the fossil fuel industry"* **[UKOP20: pages 7-9].**

29. Unfortunately, to the extent there was ever any intention to stop direct action, this appears to have been short-lived.

30. As at 31 August 2026, the Just Stop Oil website contained a new project alert referring to "Take Back Power" , suggesting that Just Stop Oil, or at least groups affiliated or linked to Just Stop Oil, remained active **[UKOP20: page 10].**

31. Furthermore, as at the date of this statement, under the "Donate" page of JSO's website, there are quotes from supporters including "*more protests are coming, buckle up*", "*disruption is part and parcel of protest, it is how you get attention"*, "*civil disobedience is our last and only hope*" and "*the next wave of rebellion is coming*" **[UKOP20: pages 11-19].**

32. On 2 September 2026, it was reported that around 60 Just Stop Oil supporters or members sat and lay in the road at Parliament Square, Westminster, during Andy Burnham's first appearance at Prime Minister's questions. That event led to traffic being brought to a halt as well as a number of arrests.

33. The Telegraph reported the events of 2 September 2026, with Cameron Ford, a spokesman for Just Stop Oil saying that the disruption was timed to coincide with Mr Burnham's first Prime Minsters Questions before he was "*deciding whether to have more oil and gas projects*" and that activists wanted to send a message that "*Just Stop Oil is back*" **[UKOP20: pages 20-23].**

34. The Just Stop Oil website itself includes an article in relation to the incident and states:

> *"60 people are blocking the road on Parliament Square, with a significant number glued on. There are a further 40+ people demonstrating in support from the pavement. The Metropolitan Police have begun to make arrests from the group blocking the road. It's expected that all will be arrested. One lane has been left free of glued-on action takers to permit access for emergency vehicles. Today's drastic actions have been taken in resistance to the possibility raised by Andy Burnham of drilling more oil and gas from the North Sea…".* **[UKOP20: pages 24-29].**

35. Just Stop Oil also confirmed a return to carrying out direct action via its own social media, stating and "*Today Just Stop Oil returned*" on 2 September 2026 (being the date of the protest activity outlined above) **[UKOP20: page 30].**

36. This recent action by Just Stop Oil indicates that the group has not ceased protest activity, remains active and is embarking on a new campaign effort in targeting the oil and gas industry (of which the Claimants are part) including protesting the possible authorisation of new oil and gas projects by the government.

37. Just Stop Oil's website also contains the following statement:

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"*For fuck's sake Just stop oil! Think this summer was bad? It was just the start. Every new oil and gas project will make things worse. We do not consent to plans that will result in 3C of warming and mass death. If you feel the same, now is the time to resist. Exhausted firefighters, collapsing nurses and overheated bus drivers – we are all Just Stop Oil now. We are coming together to demand that the UK government stop licensing all new oil and gas projects and sign a Fossil Fuel Treaty to Just Stop Oil. Anything less is a death sentence".* **[UKOP20: pages 31-32]**

38. In addition, I understand that Just Stop Oil's website recently invited people to sign up to an online call to "*plan what happens next".* The entirety of JSO's opening page can be seen at **UKOP20: pages 33-34** but opens with the statement "*The choice is stark. Either we organise a rapid, fair transformation of society – or climate change forces chaotic, violent change upon us instead."* I understand from a review of Just Stop Oil's website that an online call was originally scheduled to be held at 10am on 3 October 2026, with a further online call then due to be held at 10am on 17 October 2026.

39. The recent activity by Just Stop Oil suggests that the original threat posed by those groups remains, notwithstanding the statement made in March 2025 and the other statements referred to at paragraphs 27 to 28 above.

40. I am aware that the Court has been referred to this point in a number of recent cases where the continuation of injunctions against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil, and / or other environmental campaigns have been sought. I have read the judgments in these cases which have been shared with me by the Claimants' instructed solicitors and the judgments record that in each case the Court has determined there remains a threat from Just Stop Oil or other campaign groups and it remains the position that a real risk of unlawful activity would subsist if the respective injunctions did not continue:

    (a) In *Various Airports v Persons Unknown* [2026] EWHC 2248 (KB) at paragraph 37 of the judgment dated 30 June 2026, the Court observed that "… *there continues to be a compelling need for these orders. The evidence does indeed demonstrate the deterrent effect of the injunctions. However, it does not follow that that there can be any relaxation against the continuing background of similar type of direct-action protests"* and that "*all the ingredients that were present for the original grant of the orders remain and all the arguments which justified those orders are still in place"* **[UKOP20: pages 35-48].**

    (b) In *London Southend Airport Ltd v Persons Unknown* [2026] EWHC 2249 (KB) at paragraph 39 of the judgment dated 2 July 2026, the Court noted that "…*the fact that the injunctions have been effective does not give any cause for relaxation*", and that "*In the event that they were to be lifted, I am quite satisfied that the real and imminent risk of serious harm would continue…"* and further that "*there has been no material change of circumstance and that there is no other reason in any of the circumstances of the case not to continue with the order*" **[UKOP20: pages 49-61].**

    (c) In *Gatwick Airport Ltd v Persons Unknown* [2026] EWHC 2251 (KB), the Court took a similar approach and confirmed at paragraph 11 of the judgment dated 17 July 2026 that "t*here is no material change of circumstance and that it is necessary, compellingly necessary, for the injunction to be continued"* **[UKOP20: pages 62-68].**

41. In summary, Just Stop Oil's recent activity suggests that the threat from JSO has not gone away. Instead, the group has gone through a resurgence and has resumed direct protest action targeted at the oil and fossil fuel industry, of which the Claimants are part.

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EXTINCTION REBELLION

42. Extinction Rebellion remain a well-known protest group and a number of protests and incidents in the last year have taken place involving Extinction Rebellion, indicating that the group remains an active environmental protest group involved in direct action targeted against the oil and gas industry.

43. On 18 November 2025, it was reported that protestors from a coalition of climate movements led a march in Manchester, demanding the UK government honour its climate commitments. The demonstration was organised by Extinction Rebellion UK and other campaigners, as reported by Extinction Rebellion itself **[UKOP20: pages 69-72].**

44. On 21 November 2025, climate activists, which reportedly included members of Extinction Rebellion, scaled a Christmas tree gifted from Norway to London whilst it was being felled to protest against the Rosebank Oil field in the North Sea. Whilst the Rosebank oil field project does not directly relate to the Claimants or the Claimants' business activity, there is evidence of continuing use by Extinction Rebellion supporters of direct-action tactics to delay or disrupt and generate publicity **[UKOP20: page 73].**

45. On 26 November 2025, it was reported that Extinction Rebellion gathered on a Wimborne footbridge to display placards and publicly read climate change testimonies. The protest promoted anti-fossil fuel messaging, including calls for a global phase-out of fossil fuels and criticism of fossil fuel subsidies **[UKOP20: pages 74-76]**.

46. I understand from reviewing the evidence submitted as part of the *Shell* injunction reviews[1] that on 28 December 2025, an Extinction Rebellion protest group of approximately 35 demonstrators, accompanied by four members of the Red Rebel Brigade, passed through the Belvedere Road area as part of a march travelling from Westminster Bridge towards London Bridge. The group briefly gathered on Belvedere Road, with drummers and performers in red robes present, before continuing towards the Festival Hall.

47. On 20 January 2026, it was reported that Extinction Rebellion activists demonstrated outside Macquarie Group's London headquarters, criticising its majority ownership of Farnborough Airport and proposed increases to annual flight limits. Two protesters dressed as aircraft occupied the entrance canopy and displayed a banner calling for a ban on private jets and, importantly from the point of view of the Claimants, an end to fossil fuel investments **[UKOP20: page 77-78].**

48. On 29 June 2026, it was reported that protestors associated with Extinction Rebellion disrupted the launch of the University of Exeter's Climate and Environment Institute during the Exeter Climate Forum by staging a protest and occupying the stage. The protest targeted the forum's sponsorship by Howden, an insurance broker accused by campaigners of facilitating fossil fuel projects through insurance services. Activists used the event to criticise links between climate institutions and companies connected to the fossil fuel sector **[UKOP20: pages 79-83].**

49. On 14 September 2026, it was reported by Extinction Rebellion that its members had organised a protest march in central London demanding publication of the Government's unredacted National Security Assessment **[UKOP20: pages 84-87].**

[1] Shell International Petroleum Company Limited v Persons Unknown (as more particularly defined), Claim Number: QB-2022-001259; Shell U.K. Oil Limited v Persons Unknown (as more particularly defined), Claim Number QB-2022-001241, Shell U.K. Oil Products Limited v Persons Unknown (as more particularly defined), Claim Number: QB-2022-001420.

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50. On 24 September 2026, it was reported that climate campaigners, including members of Extinction Rebellion and Green New Deal, protested and lobbied councillors during a meeting considering a motion to rescind Calderdale Council's 2019 climate emergency declaration. Two protesters interrupted proceedings and were removed by security **[UKOP20: pages 88-91].**

51. On 23 October 2026, it was reported that Extinction Rebellion protested at Albert Square, Manchester (the location of Andy Burham's offices) against Rosebank, holding signs saying "No New Fossil Fuels" **[UKOP20: page 92].** Again, whilst the Rosebank oil field project does not directly relate to the Claimants or the Claimants' business activity, the protest included wider messaging targeted at the fossil fuel industry.

52. Accordingly, there is evidence that both Just Stop Oil and Extinction Rebellion remain engaged in protest activity, including direct action, which is directly targeted at members of the oil and gas industry, with that activity increasing both in frequency and in severity since my Seventh Witness Statement. Furthermore, I am not aware of Just Stop Oil, Extinction Rebellion, or any other environmental group having provided any assurances or evidence to either the Court or the Claimants that the Sites will not be targeted again in the future.

OTHER ENVIRONMENTAL / CLIMATE CAMPAIGN GROUPS

53. As a result of the November 2025 Order, the definition of the Defendants included in the Amended October 2023 (and therefore subject to the Final Injunction) was widened to include members of other environmental campaigns. Therefore, in addition to Just Stop Oil and Extinction Rebellion, I set out below the activities of other protest groups who are targeting companies and organisations affiliated with the oil and gas industry.

FOSSIL FREE LONDON

54. Fossil Free London's website describes the group as one which "*disrupts and protests the fossil fuel industry"* **[UKOP20: page 93].** Their website also states that the group uses "*visible and disruptive protest actions to challenge fossil fuel corporations and their enablers here in London*" **[UKOP20: page 94]**. I recognise that this language, the group's name and the activities identified below indicate that London is presently the principal focus of its protest activity. Neither Site 1 nor Site 2 is situated in London.

55. However, the substantive objectives of Fossil Free London's campaigns are not confined to activities or projects located in London. The "*Campaigns*" section notes that Fossil Free London's campaigns include *"Our Anti Oil and Gas campaign strand works to counter key fossil fuel corporations (like Shell) and new oil & gas projects (like Rosebank)*". The Claimants are, of course, both prominent members of the oil industry **[UKOP20: pages 94-95]**. Rosebank, and the Jackdaw project which is also prominently opposed on the group's website, are North Sea developments outside London. The website describes the group as opposing new UK oil and gas and states that it is "*throwing everything*" at fighting Rosebank **[UKOP20: page 93]**

56. The website also demonstrates that Fossil Free London seeks to engage supporters beyond London. Its "*Get involved*" page separately addresses people "*Outside of London*", inviting them to join its mailing list and receive updates about its activity. **[UKOP20: pages 96-97]** It has also advertised for a full-time campaigner to deliver a 12-month protest-based campaign against a major oil company to deliver what is described as an "*active, far-reaching, and effective campaign*". **UKOP20: pages 98-100]**. Those matters indicate an organised capacity to research targets and mobilise supporters and mean that the risk cannot safely be assessed solely by reference to the word "London" in the group's name or the location of its activities to date.

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57. In terms of its activities, on 5 November 2025, it was reported that at least 2 activists from Fossil Free London disrupted a BP speaker on the panel of a discussion hosted by the Association of International Energy Negotiators at Simmons & Simmons LLP's London office **[UKOP20: pages 101-102].** Fossil Free London also posted about the event on their own social media **[UKOP20: page 103].**

58. In addition, on 4 December 2025, it was reported that members of Fossil Free London disrupted the World Energy Council Assembly awards dinner at the Hilton Hotel in Mayfair, London. Protesters entered the event, where oil and gas industry representatives including nominees/attendees from Shell, BP and Ithaca Energy were present, and chanted "*no awards for climate criminals*" before being removed by security **[UKOP20: pages 104-105].**

59. On 13 February 2026, it was reported that Fossil Free London held a themed protest in St Dunstan's in the East ahead of the Government's decision on the Rosebank oil field. Participants dressed as couples and displayed placards including "*Stop Rosebank*," "*Save Me*," and "*Hot Earth*." The article reports that the group's director publicly called on the Government to reject new oil projects **[UKOP20: pages 106-107].**

60. Similarly, in February of 2026, Fossil Free London activists disrupted events held at hotels and bars hosting executives attending International Energy Week in London, as posted on the group's own social media. **[UKOP20: page 108].**

61. On 11 March 2026, Fossil Free London publicised a protest targeting Shell at the London Oceanology Conference, alleging that Shell has caused extensive environmental damage in the Niger Delta and has failed to adequately "*clean up*" pollution from historic oil operations **[UKOP20: page 109-110].**

62. On 5 May 2026, it was reported that Fossil Free London staged a protest outside the London offices of Equinor ahead of oil and gas Q1 profits announcement. Activists piled life-sized body bags outside the offices of Equinor, as one campaigner dressed as an executive stood on top of them **[UKOP20: pages 111-112].**

63. On 6 May 2026, Fossil Free London protested outside Shell's headquarters ahead of quarterly profits which were due to be announced on 7 May 2026. It was reported that the protest included a demonstration with bloody petrol pumps **[UKOP20: pages 113-114]** and the protest was also posted on the group's social media accounts **[UKOP20: pages 115].**

64. On 18 May 2026, climate activists gathered around Shell's headquarters on the day of the annual general meeting demanding justice for the Philippines and Niger Delta. Social media posts from Fossil Free London stated *"We're outside Shell HQ on the day of their AGM with a clear message: it's the world v Shell!*! **[UKOP20: page 116].**

65. On 27 May 2026, it was reported that Fossil Free London staged a stunt outside a supermarket in Hackney to draw attention to cost of living and oil/gas prices soaring. I understand that this involved campaigners dressed as oil executives filled with sacks of money. There were also reportedly placards stating *'Shell profits. We pay the price*"**[UKOP20: pages 117-120].**

66. On 1 April 2026, it was reported that activists campaigned outside the US Embassy in London in response to the increase in oil company profits in the wake of the war in Iran. Two activists were tied with life sized petrol pumps branded Rosebank **[UKOP20: pages 121-124].**

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67. On 8 July 2026, Fossil Free London announced its new campaign "London Calling" which suggests that "*In the face of this crisis Fossil Free London are planning something big - but we need you to make it happen*" suggesting that a further campaign is due to be deployed by the group **[UKOP20: page 125-128]**

68. On 9 July 2026, Fossil Free London campaigners protested inside the QEII Centre in Westminster "*to demand that they: stop hosting oil*". In a social media post from Fossil Free London, the group stated that "*They willingly allow Shell, Exxon, as well as weapons manufacturing corporations to meet in their venue*" **[UKOP20: page 129].**

69. On 16 July 2026, Fossil Free London campaigners again protested inside the QEII Centre in Westminster while the venue hosted its annual Summer Showcase. It was reported that five campaigners entered the event and made speeches stating "*Did you know the QEII Centre is one of the biggest hosts of the fossil fuel companies in London? They line the pockets of the oil and gas industry. They have blood on their hands and their pocked are lined with oily money"* **[UKOP20: pages 130-132]**.

70. On 29 July 2026, it was reported that Fossil Free London protestors had gathered at Shell's headquarters and held signs stating "DON'T POUR OIL ON THE FIRES" and "SHELL FUELS WILDFIRES" "SHAME ON SHELL" **[UKOP20: pages 133-134].**

71. On 5 September 2026, Fossil Free London staged a major demonstration outside Parliament against reports that the Jackdaw gas field would be approved, as publicised on its own social media. Activists carried banners reading "*Jackdaw: Burnham's betrayal*" and "*No More Planet Wrecking Fossil Fuels".* Jackdaw is a reference to the major North Sea gas and condensate development and is not directly related to the Claimants or the Claimants' business activity but is linked to the oil and gas industry generally **[UKOP20: page 135].**

72. Taken together, the matters above demonstrate sustained hostility towards the oil and gas industry generally, including named corporations and projects situated outside London; a stated commitment to visible and disruptive action; and a willingness to enter and disrupt venues associated with that industry. I recognise that the examples identified above took place in London and that I have not yet come across evidence of Fossil Free London itself carrying out direct action at an operational oil or gas site outside London. I nevertheless consider its activities relevant to the assessment of risk because its campaigns concern UK-wide oil and gas projects and companies whose operations and assets are not confined to London, and because its website demonstrates the ability to organise planned actions and communicate with supporters outside London.

CUT THE TIES TO FOSSIL FUELS

73. Cut the Ties to Fossil Fuels' donation site "Chuffed" remains active and states:

"*Now as an independent, autonomous campaign, Cut The Ties To Fossil Fuels will be able to work with a broader spectrum of other activist groups and movements, whilst remaining agile and focusing on our core belief in non violent direct action. We only do direct action*." Cut the Ties to Fossil Fuels therefore remains active **[UKOP20: pages 136-137]**

74. On 10 December 2025, it was reported that Cut The Ties To Fossil Fuels staged a protest at a business on Three Field Lane, Southampton, displaying banners including "*cut the ties to carbon pollution*". Police attended following reports of the protest and arrested one protester. Hampshire

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Police stated that officers were balancing the rights of lawful protest with the rights of others to avoid unacceptable disruption, with public safety as the priority **[UKOP20: pages 138-140**

75. Cut the Ties to Fossil Fuels has also been reported as involved in the protest of 20 January 2026 outside the Macquarie Group headquarters in London referred to at paragraph 47 of this statement, positioning themselves in front of the main entrance and holding banners that urged the company to cut ties with fossil fuels. I understand from the reports that Extinction Rebellion activists were present and at least one individual was arrested. **[UKOP20: pages 77-78]**

76. On 27 May 2026, it was reported that protestors aligned with Cut the Ties to Fossil Fuels had targeted Federated Hermes (an Investor in Total Energies, in turn a majority shareholder in the East Africa Crude Oil Pipeline) **[UKOP20: pages 141-143].** This involved entering the lobby of Federated Homes to display banners, painting windows with slogans and setting off smoke flares. The same action appears to be advertised on the Action Network Website requesting "*the usual support crew"* **[UKOP20: page 144]**

OTHER GROUPS

77. In addition to the specific activity of the groups I have outlined above, I understand that there are additional groups continuing to target the oil and gas industry as set out below:

(a) On 23 January 2026, it was reported that climate protesters had disrupted and caused an evacuation at the Fitch Ratings Insurance Insights 2026 conference in London the previous day. The protesters called on the UK insurance sector to stop supporting the fossil fuel industry and held up placards stating "*No New Workers for Fossil Fuel Insurers*" **[UKOP20: pages 145-146].**

(b) On 19 February 2026, it was reported that Christian Climate Action protested against Rosebank, holding a 24 hour prayer vigil outside St Paul's in London. The activists left white sheets in front of the steps of St Pauls with tombstones art their feet to represent people around the world dying due to climate impact **[UKOP20: pages 147-149].**

(c) On 7 May 2026, it was reported that Greenpeace activists had projected photos across buildings displaying alleged sources of Shell's profits and claiming "*They Profit We Pay*" "*War Profits HQ*" "*War profiteers*" **[UKOP20: pages 150-152].**

(d) I understand from reviewing the evidence submitted as part of the *Shell* injunction review that on 21 April 2026, ten protestors arrived at the Shell Centre Tower in London and refused to disclose details of the group they belong to (though it was submitted to the Court that many were believed to be from Fossil Free London). Two protestors sat on Jubilee walls. The remaining eight gathered around a beach ball with a world map drawn on it. One protestor repeatedly hit the beach ball with a baseball bat until it burst, releasing a sticky red paint-like substance.

(e) On 28 April 2026, it was reported that Climate activists forced the chair of NatWest to halt its annual general meeting after the bank disclosed in February that it had loosened restrictions imposed on financing of clients' fossil fuel activities. A few minutes into the AGM, nine protestors wearing shirts with slogan "*No more Oil*" stood and began singing. It was reported that the activists may have been members of Extinction Rebellion splinter group, XR Money Rebellion **[UKOP20: pages 153-156].**

OTHER INJUNCTION PROCEEDINGS

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78. The only updates to my knowledge in relation to:

(a) The injunctions granted to, or in relation to, oil and gas companies regarding direct action against the industry, as set out at paragraph 45 of my Fourth Witness Statement, paragraph 28 of my Fifth Witness Statement, paragraph 59 of my Sixth Witness Statement, and paragraph 34 of my Seventh Witness Statement are as follows:

Claim Number	Property	Claimant(s)	Duration of injunction
QB-2022-001259	Shell Centre Tower	Shell International Petroleum Company Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review on each year. At the second reviewing hearing on 15 October 2026, Mr Justice Richie held that the injunction should continue in full force an effect pending future review and subject to a number of amendments.
QB-2022-001241	Shell Haven Site	Shell UK Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review on each year. At the second reviewing hearing on 15 October 2026, Mr Justice Richie held that the injunction should continue in full force an effect pending future review and

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			subject to a number of amendments.
QB-2022-001420	Petrol filling station	Shell UK Oil Products Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review on each year. At the second reviewing hearing on 15 October 2026, Mr Justice Richie held that the injunction should continue in full force an effect pending future review and subject to a number of amendments.
QB-2022-001098	Fawley Petrochemical Complex, Hythe Terminal, Avonmouth Terminal, Birmingham Terminal, Purfleet Terminal, West London Terminal, Hartland Park Logistics Hub and Alton compound at Holybourne	Esso Petroleum Company Limited and Exxonmobil Chemical Limited	Final injunction granted on 29 January 2024 until 11 July 2028 subject to annual review on 18 July of each year. At the second review hearing on 22 July 2026, Mrs Justice Tipples held that the injunction should continue in full force an effect pending future review and subject to a number of amendments.
QB-2022-000904	Pembroke oil refinery and jetties, Manchester oil terminal, Kingsbury oil terminal, Plymouth oil terminal, Cardiff terminal, Avonmouth terminal and Pembrokeshire terminal	Valero Energy Ltd, Valero Logistics UK Ltd and Valero Pembrokeshire Oil Terminal Ltd	Final injunction granted until 13 December 2028 or further order in the meantime following a hearing on 17 January 2024.

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			On the second annual review on 16 February 2026, Mrs Justice Lambert DBE held that the injunction should continue in full force and effect pending further future review. The next review of this injunction will be heard in early 2027.
QB-2022-001236	Oil terminal known as Kingsbury Oil Terminal, Kingsbury, Warwickshire	North Warwickshire Borough Council	Final injunction granted until 6 September 2027. At the second reviewing hearing on 7 October 2026, HHJ Kelly held that the injunction should remain in full force and effect until its expiry.

(b) The updates to injunctions obtained by parties against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil, and / or Insulate Britain campaigns as previously set out at paragraph 46 of my Fourth Witness Statement are as follows:

Claim Number	Property/Land	Claimant(s)	Duration of injunction
QB-2021-003841	Multiple A roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028. At the review hearing in November 2025, the Claimant indicated that it would not seek

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			continuation of the injunction.
KB-2022-003542	Multiple Roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028. At the review hearing in November 2025, the Claimant indicated that it would not seek continuation of the injunction
KB-2024-002210	Heathrow Airport	Heathrow Airport Limited	Final injunction granted until July 2029, subject to review. At the most recent review hearing in July 2026, the Court upheld the injunction.
KB-2024-002336	Gatwick Airport	Gatwick Airport Limited	Final injunction granted until July 2029, subject to review. At the most recent review hearing in July 2026, the Court upheld the injunction.
KB-2024-001765	London City Airport	London City Airport Limited and Docklands Aviation Group Limited	Injunction granted on 20 June 2024 until 20 June 2029, final determination or further order in the meantime. At the most recent review hearing in June 2026, the Court upheld the injunction.

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KB-2024-002132	London Stansted Airport, Manchester Airport and East Midlands International Airport	Manchester Airport PLC, Airport City (Manchester) Ltd, Manchester Airport Car Park Limited, Stansted Airport Ltd and East Midlands International Airport Ltd	Injunction granted on 5 July 2024 with immediate effect. At the most recent review hearing in June 2026, the Court upheld the injunction.
KB-2024-002473	Bristol Airport and Liverpool Airport	Birmingham Airport Limited, Liverpool Airport Limited, Peel L&P Investments (North) Limited, Bristol Airport Limited, South West Airports Limited and Bristol Airport Developments Limited	Injunction granted on 6 August 2024 with immediate effect. At the most recent review hearing in June 2026, the Court upheld the injunction.
KB-2024-002317	Leeds Airport, London Luton Airport and Newcastle International Airport	Leeds Bradford Airport Limited, London Luton Operations Limited, Newcastle International Airport Limited and Nial Services Limited	Injunction granted on 19 July 2024 with immediate effect. At the most recent review hearing in June 2026, the Court upheld the injunction.
KB-2024-002596	London Southend Airport	London Southend Airport Company Limited, London Southend Solar Limited and Thames Gateway Airport Limited	Injunction grated on the 14 August 2024 until 14 August 2029. At the most recent review hearing in July 2026, the Court upheld the injunction.

SUMMARY

79. The evidence set out above, as well as that in my Previous Witness Statements, demonstrates that there continues to be a significant active threat posed by Just Stop Oil, Extinction Rebellion,

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as well as other environmental campaign groups, and which continues to target those affiliated with the oil and gas industry.

80. It is clear that a number of environmental campaign groups, including Just Stop Oil, have increased their protest activity against the oil and gas industry despite previous suggestions that direct action had ceased.

81. At paragraph 58 of my Sixth Witness Statement and paragraph 36 of my Seventh Witness Statement, I set out why the targeting of airports is a concern for the Claimants and why the continuation of the injunctions noted at paragraph 78(b) remains of critical importance to the Claimants. In particular, the terminal at Site 1 is an important fuel source to the British aviation industry, providing aircraft fuel for local airports including Gatwick, Heathrow and Luton airports. It is therefore of key strategic importance to the UK as a key hub in the distribution of fuel for aviation and Heathrow, Gatwick and Luton airports depend on supplies from the Site 1 terminal to maintain operations. In addition, the terminal at Site 2 is also of key strategic importance to the UK as it provides aviation kerosene to the Midlands airports.

82. As referred to at paragraph 55 of my Third Witness Statement, paragraph 48 of my Fourth Witness Statement and paragraph 61 of my Sixth Witness Statement, given the importance of the Sites covered by the Final Injunction, the continuing action and / or threat of action by Just Stop Oil and Extinction Rebellion and other environmental campaigns, and the highly disruptive and inherently dangerous effect of the protesting techniques used by those groups, I continue to believe that in the absence of the final injunctive relief under the Final Injunction continuing, there is a real risk of imminent trespass and / or interference with the private access routes in relation to the Sites. This was the conclusion reached by HHJ Emma Kelly when continuing the NWBC Order in relation to Kingsbury Oil Terminal (of which Site 2 forms part), as she noted the Terminal would remain a prominent target if individuals are minded to take direct action or other protest activity (thereby recognising the threat posed to Site 2).

83. The Final Injunction continues to have a deterrent effect, and its impact (as well as that of Orders of a similar nature granted to other oil and gas operators) on deterring unlawful protestor activity on sites owned by oil and gas operators has been referred to by both Just Stop Oil and Extinction Rebellion, as outlined at paragraph 62 of my Sixth Witness Statement.

PROCEEDINGS

84. The Claimants' solicitors have confirmed to me that no acknowledgment of service, admission or defence has been received on behalf of any Defendant to these proceedings since my Seventh Witness Statement (or at all). The Claimants' solicitors have also confirmed to me that no Defendant has ever engaged with these proceedings.

CONCLUSION

85. For the reasons set out in this statement and the Previous Witness Statements, I respectfully request that the Final Injunction granted by the Amended October 2023 Order continues in full force and effect.

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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: Signed by: John Armstrong 6E140BA83F324D9... Dated: 16 November 2026

John Michael Armstrong