

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY 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, 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, 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

FOURTH WITNESS STATEMENT OF

JOHN MICHAEL ARMSTRONG

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 1000km 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 "**UKOP9**". 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. I make this statement in support of the Claimants' application for summary judgment to obtain an order for final injunctive relief in the terms set out in the draft order.
9. The purpose of this third witness statement, which supplements my first, second and third witness statements dated 7 April 2022, 14 April 2022 and 5 April 2023 respectively (the "**Previous Witness Statements**"), is to provide to the Court with an update in respect of events following the grant of an interim order for injunctive relief in these proceedings made by the Honourable Mr Justice Rajah following a hearing on 20 April 2023 (the "**Order**") and therefore addresses:
 - (a) evidence of direct action which has occurred in the vicinity of Site 1 and Site 2 since the making of the Order;
 - (b) evidence of direct action targeted at other operators which has occurred since the date of my witness statement dated 5 April 2023; and
 - (c) evidence of direct action by Just Stop Oil and Extinction Rebellion, including where such action has targeted other organisations affiliated with the oil and gas sector which has occurred since the date of the Order.

DIRECT ACTION IN THE VICINITY OF SITE 1 AND SITE 2

10. In my first and second witness statements dated 7 April 2022 and 14 April 2022, 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 interim order for pre-emptive injunctive relief.

11. In my third witness statement dated 5 April 2023, I addressed the further incidents of direct action in close proximity to Site 2 since the date of the order for pre-emptive injunctive relief made by Mr Peter Knox KC acting as a Deputy High Court Judge in the Chancery Division following a hearing on 20 April 2022 (the "**April 2022 Order**").

12. Since the date of the Order, there has been no further direct action at, or in the vicinity of, Site 1 and Site 2. However, I believe that the reduction in direct action is due to a number of factors which I refer to at paragraph 20 in my third witness statement dated 5 April 2023, including:

- (a) the service of the April 2022 Order and the Order at the Sites and by email to the campaign groups Extinction Rebellion and Just Stop Oil;
- (b) the April 2022 Order and the Order providing a deterrent effect. For example, in response to a member of the public tweeting:

"They are in the wrong place. Outside oil refineries would be the right place to protest. Then of course they would not get the publicity they crave. Stopping workers only make their protest null and void."

on 9 June 2023 at 10.20am Just Stop Oil tweeted:

"Do you know what happens if you protest outside oil refineries now? Oil companies have bought injunctions to ban people from taking action at refineries, distribution hubs, even petrol stations. Punishments for breaking injunctions range from unlimited fines to imprisonments"

Extinction Rebellion UK retweeted the above tweet on 9 June 2023 **UKOP9: page 8**;

- (c) the continuing existence of an injunction order made by Mr Justice Soole on 20 January 2023 in favour of Valero Energy Limited, Valero Logistics UK Limited and Valero Pembrookshire Oil Terminal Limited (together, "**Valero**") and which protects a number of Valero's sites including land interests at Kingsbury Oil Terminal (of which Site 2 forms part) (the "**Valero Order**"). A copy of the Valero Order can be found at **UKOP6: pages 85-124**; and
- (d) the continuing existence of an injunction order made by Mr Justice Sweeting in the King's Bench Division dated 9 May 2022 in favour of the North Warwickshire Borough Council and which protects the locality of the Kingsbury Oil Terminal (of which Site 2 forms part) by placing restraints on the organisation of, or participation in, any protest against the production or use of fossil fuels at Kingsbury Oil Terminal (the "**NWBC Order**"). In particular, the NWBC Order gives a power of arrest outside the Kingsbury Oil Terminal and at the junctions of the roads leading into it. A copy of the NWBC Order can be found at **UKOP6: pages 125-131**. The NWBC Order remains in force as at the date of this witness statement. However, an application has been made to set aside the NWBC Order, which application I refer to at paragraph 49 below.

13. If any of these factors were to be removed, I believe that the direct action would escalate.

14. The deterrent effect provided by the Order continues to assist the Claimants in ensuring that they can conduct their operations at the Sites without risk of the significant practical, financial and logistical implications for the Claimants, many other third parties and potentially the UK economy, which would otherwise arise from direct action, not to mention the substantial health and safety risks that I refer to in paragraphs 20 to 42 of my first witness statement.

EVIDENCE OF DIRECT ACTION BY JUST STOP OIL AND EXTINCTION REBELLION, INCLUDING TARGETING OF OTHER OPERATORS AND AFFILIATED ORGANISATIONS FROM 5 APRIL 2023 TO 6 JULY 2023

15. Since the date of the Order, there continues to be activity targeted at industries and organisations that members of Extinction Rebellion and / or Just Stop Oil consider to be affiliated to the oil and gas industries.
16. On 24 April 2023, Just Stop Oil announced a new campaign involving disruption across central London by marching slowly on major roads as part of an *"indefinite campaign of civil resistance to demand an end to new UK oil and gas projects"* **UKOP9: pages 9-10**
17. On 12 June 2023, the Metropolitan Police confirmed that there had been 156 slow marches since the end of April, with 86 arrests and 49 charges made **UKOP9: pages 11-12**. As of 6 July 2023, Just Stop Oil supporters have completed up to seven marches a day, six days a week since the campaign commenced on 24 April 2023, causing disruption and blockage to traffic on major roads across London (**UKOP9: pages 13-152**) including:
 - (a) On 3 May 2023, 55 Just Stop Oil supporters began marching at The Shell Centre on London's South Bank aiming for Parliament Square. The police served a notice under section 12 of the Public Order Act 1986 (a **"section 12 notice"**) on the protesters **UKOP9: pages 21-25**. I understand a section 12 notice is served where a senior police officer gives directions such as conditions on public processions as necessary where they reasonably believe there could be, for example, serious public disorder, serious damage to property or serious disruption to the life of the community;
 - (b) On 11 May 2023, around 41 supporters set off marching down the Strand. After police threatened public order notices, they briefly moved to the pavement, before returning to the road at Parliament Square, where police subsequently arrested around 13 supporters **UKOP9: pages 30-31**;
 - (c) On 23 May 2023, 45 supporters marched through three major London routes, being on Blackfriars Bridge, London Bridge and Tower Bridge. This caused major disruption delays for road users, including commuters, and police issued public order notices on all three groups of participating protesters **UKOP9: pages 44-45**;
 - (d) On 24 May 2023, 39 Just Stop Oil protesters marched on roads in Islington, Marylebone and the City of London. A section 12 notice was served and six protesters were arrested for remaining on the road in breach of this notice **UKOP9: pages 46-49**;
 - (e) On 29 May 2023, 31 Just Stop Oil supporters marched down Upper Street in Islington, 41 supporters marched down Holloway Road in Islington and 9 supporters disrupted traffic outside Wimbledon Magistrates Court. It was reported that supporters were acting in solidarity with the protesters charged following the events at the Rugby Premiership final on 27 May 2023, as referred to at paragraph 28 below **UKOP9: pages 54-55**;
 - (f) On 30 May 2023, police served section 12 conditions on Just Stop Oil demonstrators causing disruption and forcing traffic to a crawl during rush hour by marching on Waterloo Bridge, Tower Bridge, London Bridge and Blackfriars Bridge **UKOP9: pages 56-59**;
 - (g) On 1 June 2023, around 50 Just Stop Oil supporters marched in five groups on roads around Hyde Park and Battersea Park and a smaller group walking on Kensington Gore delayed the England Cricket Team coach. Police served a section 12 notice in order to move the supporters off the road. On the same date, a further march took place on Waterloo Bridge, where three people were arrested **UKOP9: pages 62-64**;

- (h) On 5 June 2023, around 75 Just Stop Oil supporters marched in four groups in West, East and South London, with two supporters being arrested by police in Vauxhall **UKOP9: pages 68-73;**
 - (i) On 7 June 2023, eight arrests were made as 54 Just Stop Oil protesters marched along key routes in in Hammersmith, Islington and Bayswater and following a second set of marches in the West End, City Fulham and Borough **UKOP9: pages 74-76;**
 - (j) On 14 June 2023, Just Stop Oil supporters marched at ten locations across London, including Westminster Bridge, London Bridge, Tower Bridge and other major routes in Central London along with roads around West London. Nine protesters were arrested at various locations for refusing to leave the road or comply with conditions imposed by officers **UKOP9: pages 94-98;**
 - (k) On 15 June 2023, 54 Just Stop Oil supporters marched in four groups on roads around Ealing and Battersea Bridge. Nine supporters were arrested at Hanger Lane in Ealing for failing to comply with a section 12 notice **UKOP9: pages 99-102;**
 - (l) On 20 June 2023, 26 Just Stop Oil supporters slow marched on Queen Victoria Street near Mansion House tube station and continuing on key roads through the City until police served a section 12 notice **UKOP9: pages 109-111;**
 - (m) On 26 June 2023, Just Stop Oil supporters carried out four separate slow marches across London, which included blocking Denmark Hill in Camberwell, close to the hospital entrance of King's College Hospital. Metropolitan Police issued a Section 12 condition for the Just Stop Oil supporters to move out of the carriageway **UKOP9: pages 119-130;**
 - (n) On 27 June 2023, 34 Just Stop Oil supporters launched a slow march across London Bridge. Police were called and a section 12 notice was issued **UKOP9: pages 131-136;** and
 - (o) On 30 June 2023, a group of 25 student Just Stop Oil supporters disrupted traffic outside Waterloo Station. Following a section 12 notice being issued by the Metropolitan Police, the supporters then moved to Parliament Square. A Just Stop Oil press release confirmed that three of the supporters were defying bail conditions by protesting at Parliament Square **UKOP9: pages 141-144.**
- 18. On 9 June 2023 and 15 June 2023 Just Stop Oil posted tweets indicating that protesters were breaking bail conditions to join the slow marches **UKOP9: pages 153-154.**
 - 19. In addition to the slow march campaign, members of Extinction Rebellion and Just Stop Oil continue to carry out direct action at public locations and events.
 - 20. On 10 April 2023, it was reported that two Just Stop Oil protesters breached a security barrier and climbed the "*Dippy the Diplodocus*" exhibition at the Herbert Art Gallery and Museum in Coventry, which resulted in the museum closing for the day. The protesters were apprehended by the security guards, arrested by West Midlands Police on conspiracy to cause criminal damage and subsequently charged with having an article with intent to destroy or damage property **UKOP9: pages 155-160.**
 - 21. On 17 April 2023, the World Snooker Championship was disrupted by an individual climbing on the snooker table and covering it in orange powder during a match, whilst another individual attempted to glue herself to the table during another match. It was later reported that Just Stop Oil had claimed responsibility for the incident. The two protesters were arrested by South Yorkshire Police. **UKOP9: pages 161-163.**

22. On 3 May 2023, activists from Extinction Rebellion addressed Barclays' annual general meeting being held at the QEII Centre in Westminster. It was reported that a number of protesters were removed by security **UKOP9: pages 164-171.**
23. On 17 May 2023, it was reported that Just Stop Oil protesters disrupted a policing inquiry regarding King Charles' Coronation. One of the activists stood up and stated "*We, as supporters of Just Stop Oil, are here today because our democracy is under threat*" before being removed from Parliament **UKOP9: pages 172-175.**
24. On 18 May 2023, Extinction Rebellion infiltrated the AGM of Lloyds Banking Group at the Armadillo in Glasgow. It was reported that the protesters had repeatedly interrupted the chairman's opening speech to criticise the bank's alleged increased financial support of the fossil fuel industry and others stood outside the venue displaying banners which read "*Lloyds take the next steps...renounce fossil fuels*" **UKOP9: pages 176-180.**
25. On 23 May 2023, it was reported that Extinction Rebellion activists had interrupted the opening remarks at the annual general meeting of Shell, condemning the fossil fuel giant and shouting "*shut down Shell*" and "*go to hell Shell*". A number of protesters were carried from or escorted out of the auditorium. Extinction Rebellion UK also tweeted on 23 May 2023 at 10:18am "*Join us to #ShutDownShell and demand #NoNewOilAndGas*" **UKOP9: pages 181-187.**
26. On 25 May 2023, Lloyd's of London annual general meeting was targeted by Money Rebellion, which has been reported as being a sister movement of Extinction Rebellion. Protesters set off fire alarm sirens and smoke flares outside Lloyd's' headquarters in London as their annual general meeting was being held inside **UKOP9: pages 187-189.**
27. On 25 May 2023, it was reported that Just Stop Oil protesters had vandalised one of the show gardens at Chelsea Flower Show by throwing orange paint powder. Commander Karen Findlay of the Metropolitan Police's major operations team commented that the gardens had been "*criminally damaged*" and the three protesters involved were arrested **UKOP9: pages 190-193.**
28. On 27 May 2023, it was reported that two Just Stop Oil supporters had stormed the pitch with orange powder paint during the Gallagher Premiership Rugby final at Twickenham. Just Stop Oil's press release after the event stated "*Just Stop Oil is calling on everyone to get off the sidelines and join in civil resistance against new oil gas and coal... Our indefinite campaign of civil resistance is underway and will not end until our government makes a meaningful statement halting new fossil fuel projects in the UK*" **UKOP9: pages 194-196.**
29. On 9 June 2023, Just Stop Oil staged its first "slow cycle" down Park Lane in London's West End and the police served a section 12 notice due to the disruption caused to traffic. It was reported that the slow cycle was in a response to the government's attempts to clamp down on marching activists and a spokesperson for Just Stop Oil confirmed "*our tactics will continue to evolve*" **UKOP9: pages 197-199.**
30. On the same date, Extinction Rebellion activists glued themselves to Schlumberger's research facility in Cambridge, a company reported as providing technology and infrastructure for oil and gas extraction to firms such as BP and Shell. It was reported that the protestors were calling on the University of Cambridge to cut ties with the company **UKOP9: pages 200-202.**
31. On 15 June 2023, three Just Stop Oil protesters disrupted an opera performance at Glyndebourne Festival in Sussex by setting off a confetti bomb, blowing an air horn and shouting. Just Stop Oil tweeted after the event to confirm that they had interrupted the festival and that "*We are running out of time. Take action with Just Stop Oil*" **UKOP9: pages 203-204.**

32. On 27 June 2023, four Just Stop Oil protesters entered the lobby of the energy firm TotalEnergies', UK headquarters and doused it with black paint from fire extinguishers. Four additional activists also covered the exterior of the building with orange paint. It was reported that Scotland Yard arrested four people on suspicion of criminal damage. One of the protesters taking action was reported as stating *"I wish we could stop these atrocities through peaceful and quiet protest, but we can't."* **UKOP9: pages 205-209.**
33. On 28 June 2023, two Just Stop Oil protesters entered the playing field during one of the England v Australia test matches at Lord's cricket ground to spread orange powder on the pitch and another protester was prevented from accessing the pitch by security. These actions delayed the game and the Metropolitan Police announced that three arrests were made after the protest. The three protesters were subsequently charged with aggravated trespass **UKOP9: pages 210-214.**
34. On 1 July 2023, it was reported that seven Just Stop Oil protesters were arrested after having interrupted London Pride by sitting in front of a Coca-Cola company float, accusing Coca-Cola of being *"the world's worst plastic polluter, accused of numerous human rights abuses"*. Two other protesters sprayed paint across the road. Five of the protesters halting the Coca-Cola float were subsequently charged with Public Order offences **UKOP9: pages 215-220.**
35. On 3 July 2023, as part of their "Cut the Ties" with the fossil fuel industry campaign, climate activists, including members of Extinction Rebellion, protested outside Wood Group's Aberdeen and Surrey offices to protest the engineering firm's ties to the oil and gas sector, including setting off flares and spraying fake black oil across the entrance of the Surrey offices Two Extinction Rebellion activists were arrested for alleged criminal damage **UKOP9: pages 221-227.**
36. On 5 July 2023, Just Stop Oil protesters ran onto Court 18 at Wimbledon, disrupting a match and throwing orange-coloured confetti and a jigsaw on the grass. One protester also sat down on the Court by the net. A statement from Just Stop Oil said *"we can't leave it to the next generation to pick up the pieces"*. Two of the protesters were arrested on suspicion of aggravated trespass and criminal damage **UKOP9: pages 228-233.**

STATEMENTS FROM EXTINCTION REBELLION AND JUST STOP OIL

37. At paragraphs 45 and 46 of my third witness statement dated 5 April 2023, I referred to the statement published by Extinction Rebellion on 1 January 2023 indicating that they would *"temporarily shift away from public disruption as a primary tactic"*, suggesting a shift in tactics and strategy. However, subsequent actions taken by the group, as referred to at paragraphs 37 to 41 and 43 of my third witness statement indicated that Extinction Rebellion was continuing to target companies and organisations, which are affiliated to the oil and gas industry with unlawful direct action. The recent action taken by Extinction Rebellion, as referred to above, indicates that the targeting of companies and organisations affiliated to the oil and gas industry is continuing, notwithstanding the public statement, and that to the extent that there was any shift away from public disruption, that disruption was only temporary.
38. Extinction Rebellion also appear to be focused on mobilising new members to their campaign. For example, at paragraph 54 of my third witness statement dated 5 April 2023, I referred to *"The Big One"* event organised by Extinction Rebellion due to take place on 21 April 2023. The event took place as planned and ran for four days with over 60,000 people in attendance and 200 participating organisations. The event included pickets outside the entrances to every major government department in Whitehall, a bio-diversity march and "die-in" and protests in Parliament Square **UKOP9: pages 234-252.** Extinction Rebellion have confirmed *"over the next three months, we will be translating the appetite for action amongst people at The Big One into a whole new range of campaigns and action across the country"* **UKOP9: pages 250.**

39. In relation to Just Stop Oil, as outlined above at paragraphs 16 to 18, Just Stop Oil are currently engaging in a sustained campaign of slow marches across central London, as well as disrupting public and high profile events as outlined at paragraphs 20 to 34. In announcing the campaign of slow marches, a spokesperson for Just Stop Oil in their press release on 24 April 2023 stated that *"we have chosen to act. Civil resistance is our only hope... We won't stop until our genocidal government ends new oil and gas"* **UKOP9: page 254.**
40. Just Stop Oil also appear to be attempting to recruit members to join in the protests, for example, by making multiple posts on Twitter inviting individuals to sign up to slow march and to *"Take action"* with Just Stop Oil **UKOP9: pages 256-257.** A press release by Just Stop Oil on 29 June 2023 also stated *"Just Stop Oil is calling on everyone to get off the sidelines and join in civil resistance against new oil, gas and coal"* **UKOP9: page 260.**
41. Similarly, Just Stop Oil's press release following the interruption to the Gallagher Premiership Rugby final outlined at paragraph 28 above stated *"Our indefinite campaign of civil resistance is underway and will not end until our government makes a meaningful statement halting new fossil fuel projects in the UK"* **UKOP9: page 196.**
42. Combined, this suggests that the fossil fuel industry (and any organisations affiliated with that industry) remains the target of Just Stop Oil's campaign and that Just Stop Oil are intending to continue their campaign, involving as many members as possible, without any discernible end date.
43. For example, in the press release by Just Stop Oil on 28 June 2023 after the disruption to the Ashes cricket match outlined at paragraph 33 above, it was reported that Just Stop Oil commented that the Lords' cricket grounds'

"principal partner' is JP Morgan, the world's worst "fossil bank," that contributed \$317 billion in fossil fuel financing from 2016 to 2020" **UKOP9:page 263.**

TotalEnergies also appears to have been targeted, as referred to above at paragraph 32, as it is a shareholder in the East African Crude Oil Pipeline (as well as being an energy company itself) **UKOP9: pages 205-209.**

44. The materials that have been published on Just Stop Oil's and Extinction Rebellion's websites as well as the groups respective social media channels therefore continue to indicate that oil and gas companies will remain a target of their campaign, and there therefore remains a risk to the Claimants' sites which the order in the terms sought would protect against.

OTHER INJUNCTION PROCEEDINGS

45. In addition to the Valero Order outlined above at paragraph 12(c), I am aware that there have been a number of other injunction orders granted to oil and gas companies in relation to protests against the industry. I have set out below a summary of the injunctions that have been obtained, which summary has been provided to me by the Claimants' solicitors:

| Claim Number | Property | Claimant(s) | Duration of injunction |
|----------------|--------------------|---|----------------------------|
| QB-2022-001259 | Shell Centre Tower | Shell International Petroleum Company Limited | Initial interim injunction |

| | | | |
|----------------|--|-----------------------------------|---|
| | | | extended on 28 April 2023 until 25 May 2023 Extended until 12 May 2024 |
| QB-2022-001241 | Shell Haven Site | Shell UK Limited | Initial interim injunction extended on 28 April 2023 until 25 May 2023 Extended on 23 May 2023 until 12 May 2024 |
| QB-2022-001420 | Petrol filling station | Shell UK Oil Products Limited | Initial 12 months expiring on 12 May 2023 Extended on 28 April 2023 until 25 May 2023 Further extended on 23 May 2023 until 12 May 2024 |
| PT-2022-000326 | Oil terminals at Stanlow, Ellesmere Port, Tranmere, Birkenhead and Northampton | Essar Oil (UK) Limited and others | Initial 12 months expiring on 11 May 2023. Extended on 11 May 2023 until 11 May 2024. |

46. In addition to the NWBC Order, I am also aware that further injunctions have been obtained by parties against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil and/or Insulate Britain campaigns. I have set out below a summary of the injunctions that have been obtained, which summary has been provided to me by the Claimants' solicitors:

| Claim Number | Property/Land | Claimant(s) | Duration of injunction |
|----------------|---|-----------------------------------|--|
| KB-2022-001317 | Roads in the vicinity of Navigator Terminals Thurrock terminal; Esso's Purfleet terminal; Exoleum's Grays | Thurrock Council Essex Council | Until further order with provision for Claimants to inform the Court within 28 days of the Supreme Court |

| | | | |
|--|--|----------------------|---|
| | terminal; and Oikos' Canvey Island terminal | | judgment in Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors (UKSC/2022/0046) |
| KB-2022-004333 | Structures over, under or adjacent to the M25 Motorway | National Highways | Initial interim injunction granted until 10 December 2022 Extended by 12 months until 15 November 2023 |
| QB-2021-003576 QB-2021-003626 QB-2021-003737 | M25, M25 feeder roads and Kent roads | National Highways | Initial 12 month injunction expiring on 9 May 2023 Extended the interim injunction on 5 May 2023 until 10 May 2024 with a renewal hearing on 26 April 2024 |
| QB-2021-003841 | Multiple A roads, bridges and tunnels in London | Transport for London | Final injunction until 2 May 2028 with an annual review hearing |
| KB-2022-003542 | Multiple Roads, bridges and tunnels in London | Transport for London | Final injunction until 2 May 2028 with an annual review hearing |

SUMMARY

47. The evidence set out above, as well as in my Previous Witness Statements, confirms that there continues to be frequent and significant direct action undertaken by Just Stop Oil and Extinction Rebellion, and which continues to target those affiliated with the oil and gas industry. There is also no clear end date to the action, in fact, the scale of the action has escalated since my first witness statement, and both organisations would appear to be focused on mobilising their supporters and recruiting new members to their campaigns.
48. As referred to at paragraph 55 of my third witness statement dated 5 April 2023, given the importance of the Sites covered by the Order, Just Stop Oil and Extinction Rebellions continuing campaigns, and the highly disruptive and inherently dangerous effect of their protesting techniques, means that I continue to believe that in the absence of further final injunctive relief being granted in the terms sought, there is a real risk of imminent trespass on the Sites and / or interference with the private access routes in relation to both Sites, and this risk would be unlikely to abate in the near or medium future. The Claimants are making this Application in an effort to minimise the risk

of a future trespass and / or interference occurring at each of the Sites by continuing the deterrent effect that appears to have arisen by virtue of the continuing relief granted by the Order.

49. I refer above and in my third witness statement (at paragraphs 56 to 58) to the fact that the Claimants currently enjoy the benefit of the double protection afforded by the NWBC Order and the Order. However, the NWBC Order remains subject to an application to set aside. It therefore remains the case that the Claimants cannot rely on the protection afforded by the NWBC Order continuing, and which therefore makes it critical that the injunctive protection sought by the Claimants continues.

For the reasons set out in this statement and the Previous Witness Statements, I respectfully request that the Court grants final injunction on the terms sought by the Claimants.

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:  Dated: 6 July 2023
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John Michael Armstrong