

Party: Claimant
Witness: John Michael Armstrong
Number: Seventh
Exhibit: UKOP17
Dated: 24 October 2025

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

SEVENTH 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 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 "UKOP17". 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.
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. I make this further statement in connection with the second annual review hearing of the Final Injunction granted by the October 2023 Order.
12. 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 October 2023 Order.
13. This seventh 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**");
 - (d) my fourth witness statement dated 6 July 2023 ("**Fourth Witness Statement**");
 - (e) my fifth witness statement dated 22 September 2023 ("**Fifth Witness Statement**"); and
 - (f) my sixth witness statement dated 4 November 2024 ("**Sixth Witness Statement**")

together my "**Previous Witness Statements**".
14. The purpose of this seventh witness statement is to provide the Court with an update in respect of relevant events following the grant of the November 2024 Order and since my Sixth 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 October 2023 Order).
15. I also address, at paragraphs 43 to 52 of this statement, the Claimants' application dated 24 October 2025 for the Court's permission to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the October 2023 Order be amended to change

the description of the Defendants accordingly (the "Application") and the basis on which the Application has been made.

DIRECT ACTION IN THE VICINITY OF SITE 1 AND SITE 2

16. 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.
17. In my Third Witness Statement, I addressed the further incidents of direct action in close proximity to Site 2 since the April 2022 Orders.
18. 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.
19. These factors included 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 ("NWBC") and which protects the locality of the Kingsbury Oil Terminal (of which Site 2 forms part) (the "NWBC Order"). As set out at paragraph 18 of my Sixth Witness Statement, a final trial of NWBC's claim was heard at a hearing on 6 September 2024 and a final injunction was granted until 6 September 2027, subject to annual reviews. A copy of the order is at UKOP14: pages 30-44. The first annual review hearing took place on 18 September 2025 and on 23 September 2025 HHJ Emma Kelly sitting as a Judge of the High Court ordered that the final injunction should continue.
20. I continue to believe that, if any of those factors I have referred to were to be removed, the direct action would escalate.

EVIDENCE OF ACTION BY JUST STOP OIL AND EXTINCTION REBELLION INCLUDING TARGETING OF OTHER OPERATORS AND AFFILIATED ORGANISATIONS FROM 5 NOVEMBER 2024 TO 24 OCTOBER 2025

21. Since the date of my Sixth Witness Statement, 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.
22. Paragraph 24, 45, and 47 of my Sixth Witness Statement refer to the occupation by Extinction Rebellion of the City of London offices of various insurers, demanding they rule out insuring coal and oil related projects and held up signs stating "*Don't insure fossil fuels*". **[UKOP14 pages 114-119]** and "*warning that they would face more actions unless they pull the plug on their fossil fuel clients*". **[UKOP14: pages 254-257] [UKOP14: pages 262-268]**. Further examples of occupation by Extinction Rebellion have been reported since then, across England, including on 8 January 2025 Extinction Rebellion occupied the Manchester office of Marsh the insurance broker. On the "XR North" (being Extinction Rebellion North) X social media account, (as reported by The Insurance Times) it stated this was because it was "*“funding our destruction” by insuring fossil fuel projects*". **[UKOP17: pages 1-2]**
23. On 6 June 2025, the Times reported in relation to Youth Demand, "*Activists from the supposedly disbanded group [Just Stop Oil], however, were playing a central role in recruiting new members to Youth Demand to help its goal of bringing London to a halt. Events were even advertised using the JSO logo.*" The Times also quoted a Just Stop Oil activist as saying, "*This is the inhale before*

we breathe out and expand into brand new territory, into something even bigger than we've tried before." **[UKOP17: pages 3-10]**

24. On 30 January 2025, BBC News reported over 1000 activists blocked the road outside of the Royal Courts of Justice **[UKOP17: pages 11-12]**. In an article in response to the protest, Just Stop Oil confirmed that they are "*committed to nonviolent direct action...*" **[UKOP17: pages 13-18]**

STATEMENT FROM JUST STOP OIL

25. The recent action taken by Extinction Rebellion, Just Stop Oil, and other associated environmental groups, as referred to above in paragraphs 21 to 24, indicates that both groups are continuing to target companies and organisations affiliated with the oil and gas industry.

26. On 27 March 2025, Just Stop Oil announced its plans to end disruptive protests and re-strategise their resistance efforts after a final demonstration on 26 April 2025. **[UKOP17: pages 19-21]**. I do not think that the Court can consider that the announcement to end disruptive protests demonstrates that there is no longer a threat to the Sites from Just Stop Oil or other environmental campaign groups due to the following:

- (a) Extinction Rebellion made a similar announcement on 31 December 2022 yet has since engaged in disruptive action as is set out at paragraphs 48 to 54 (inclusive) of my Sixth Witness Statement **[UKOP17: pages 22-23]** and as referred to above at paragraph 22.
- (b) On 25 April 2025, BBC News reported that Just Stop Oil had "*hung up the hi-vis*", a phrase which also features on Just Stop Oil's X page, suggesting an end to the organisations further disruptive activity **[UKOP17: pages 24-35]**. However, the donation page for Just Stop Oil states "*There's more to come. Help make it happen*" and references "*Civil resistance works*" (referring further to the 3,285 arrests and 180 "*political prisoners*"). **[UKOP17: pages 36-46]**
- (c) On Just Stop Oil's website, Just Stop Oil note that "*A new campaign is in the works — one that builds on our success as Just Stop Oil, and faces the grinding injustice of our political and economic system head on. We're just getting started.*" and "*More protests are coming, buckle up*". **[UKOP17: pages 36-46]**
- (d) On 26 April 2025, Mel Carrington, a spokesperson for Just Stop Oil was quoted as stating in an article by Aljazeera that "*in the background, we are working with other [similar] groups...to develop a strategy for what comes next*". **[UKOP17: pages 47-50]**
- (e) On 28 April 2025, Just Stop Oil posted on its X account that "*Just Stop Oil may have finished actions but we aren't going anywhere. People will continue their resistance in the courts, and something new is building*". **[UKOP17: pages 51-52]**
- (f) The "Action" page of Just Stop Oil's website states "*a new revolutionary direct action campaign is coming. Help us build what's next*". **[UKOP17: pages 53-58]**
- (g) On Just Stop Oil's website, Just Stop Oil note that "*... revolutionary change is needed now more than ever*" and "*Nothing short of a political and economic revolution is going to get us out of this mess. We're just getting started*". **[UKOP17: pages 53-58]**
- (h) The FAQ section of Just Stop Oil's website states "*we are going to cause disruption*" and suggests that arrests are probable. **[UKOP17: pages 60-62]**

- (i) On 16 May 2025, it was reported by GB News that despite Just Stop Oil's previous announcement as referred to at paragraph 26(b) above, its members still have strong intentions to seek public attention by using highly disruptive strategies. Audio recordings of an alleged private internal Just Stop Oil meeting record a co-ordinator summarising the views of the group to remain "*action based*", make sure they are "*not becoming something more like Greenpeace*" and to continue doing acts like "*Darwin's grave*" (which would appear to be a reference to two Just Stop Oil activists graffitiing Charles Darwin's grave at Westminster Abbey in January 2025) and "*citizens arrests*". Further it was "*very important to do the spicy stuff*" and that "*to do protest stuff you have to do naughty stuff*". The individual admitted Just Stop Oil had had conversations with the Citizens Arrest Network and were "*extremely jealous of the stuff they have been doing*" however, it was said, if the Citizens Arrest Network had been "*more spicy*" they would have gained more media attention. It was further stated a "*rest*" and "*reset*" was needed before coming back and there was consensus that the group should "*carry on with civil disobedience, direct action, because it's the most effective thing to do*". Finally, it was stated in the "*second go around*" it was "*very much needed*" that they had to be so unpopular with the public. The report is available on GB News' YouTube site (https://www.youtube.com/watch?v=Jzkbkc4_yw). A transcript of this report can be seen at **[UKOP17: pages 63-71]**.
- (j) On 19 May 2025, Just Stop Oil posted on its X account an image stating "*Just Getting Started*". **[UKOP17: page 71]**
- (k) On 21 May 2025, Just Stop Oil circulated a link to a GB News story with the comment "*GB news was right for once. We are "plotting a very big comeback"*". **[UKOP17: pages 73-74]**
- (l) On 3 June 2025, in a blog post written by Mel Carrington, a spokesperson for Just Stop Oil, it is stated that "*[Just Stop Oil] are building a new street movement rooted in local communities and dedicated to nonviolent civil resistance on a scale that Just Stop Oil never even dreamt of*" and asks its followers to "*Help put people on the streets*". **[UKOP17: pages 75-78]**
- (m) On 18 June 2025, Just Stop Oil posted about the prospect of hotter UK summers in the next decade on their Instagram social media account with the following caption "*Over 1000 people died, homes and business burned down, roads melted and train tracks buckled. If we keep burning fossil fuels, it's only going to get worse. Help fund the nonviolent revolution. Link in bio — @just.stopoil*" **[UKOP17: page 79]**
- (n) Previously, Just Stop Oil's website suggested its focus was on stopping the granting of new licences to extract oil or gas **[UKOP2: page 195]**. However, a review of Just Stop oil's website suggests that the focus of Just Stop Oil now seems to be on the stopping of extracting and burning of oil and gas by 2030 **[UKOP17: page 60]**. Given the respective Sites' role in the supply chain for oil and gas fuels across the country, the Claimants are concerned that they will remain potential protest locations in connection with Just Stop Oil's new campaign focus.

27. I am 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 have been sought. I have read the judgments in these cases which have been shared with me by the Claimants' instructed solicitors. The judgments record that the Court has determined in each case set out below that the announcement by JSO does not demonstrate that there is no longer a threat from Just Stop Oil or other environmental

campaign groups and that a real risk of unlawful activity would subsist if the respective injunctions did not remain in place:

- (a) In (1) *ESSO Petroleum Company, Limited and (2) Exxonmobil Chemical Limited v Persons Unknown* [2025] EWHC 1768 ("**Esso**") at paragraph 25 of the judgment, the Court observed that Just Stop Oil's announcement "*cannot be taken as an unequivocal and final renunciation of direct action*" and further that it would be "*premature to rely on this announcement as a basis for amending or discharging the injunction*"; (**UKOP17: pages 80-88**)
- (b) In *London City Airport Ltd & Ors v Persons Unknown* [2025] EWHC 2223 at paragraph 15 of the judgment, the Court held that "*although the announcement by JSO on 21 March 2025 could signal a reduction from the risk of unlawful activity at the airports, there is also clear evidence of a possible U-turn from that announcement*" (**UKOP17: pages 89-98**); and
- (c) In *Gatwick Airport Ltd v Persons Unknown* [2025] EWHC 2228, at paragraph 29 of the judgment the Court agreed with the analysis in Esso. It was further confirmed at paragraph 30 that "*there remains such a risk from other similar protest organisations*" and, at paragraph 31 that "*There has been no indication from any of these organisations, including Just Stop Oil, that they have abandoned the convictions that has underpinned their actions thus far*". (**UKOP17: pages 99-111**)
- (d) In the review hearing of the NWBC Order which I refer to at paragraph 19 above, and which took place on 18 September 2025, the Court also agreed with the Court's analysis in Esso and concluded, at paragraph 22 of the judgment, that the references to "*just getting started*", civil resistance and a "*new revolutionary direct action campaign*" on Just Stop Oil's website "*very much suggest that Just Stop Oil do indeed have further direct action planned*". The Court also found, at paragraph 23 of the judgment, that "*if individuals are minded to take direct action or other protest activity, the Terminal remains a prominent target. The evidence before the Court is that the Terminal continues to operate as it did when the Injunction was granted. The Terminal remains a prominent cog in the supply chain of oil and gas products for consumption...*" The references to "*Terminal*" in the judgment are of course to Kingsbury Oil Terminal, of which Site 2 forms part. In fact, the Chief Executive of NWBC, Mr Maxey, who gave evidence at the review hearing is recorded in the judgment (at paragraph 19) as having stated that at a meeting of the Strategic Coordinating Group of the Warwickshire Local Resilience Forum which he attended, the police indicated that they continue to regard the NWBC Order (and its power of arrest) as being "*operationally essential and being the mechanism by which order has been resorted to the site*". (**UKOP17: pages 112-125**)

28. A summary of the outcome of the recent hearings in the above matters, and the further injunction proceedings of which I am aware is at paragraphs 34(a) and 34(b) of this statement, as well as paragraph 19 in respect of the NWBC Order.

29. Indeed, activist members, including members of Just Stop Oil, acknowledge the utility of direct action and a willingness to do the same again, including:

- (a) On its website, Just Stop Oil refer to their campaigns to date as "*one of the world's most effective climate campaigns*". [**UKOP17: page 53**]
- (b) Just Stop Oil remain a member of the A22 Network, a network which will do "*whatever it takes*" to meet its aims and demands. [**UKOP17: page 126**]

- (c) In an article dated 19 May 2025, Ella Ward, a member of Just Stop Oil, stated, following her arrest as a result of plans to enter Manchester Airport's airfield, that she would "*still do it again*". **[UKOP17: pages 127-132]**
- (d) In an article dated 23 July 2025, following conditional discharges given to Just Stop Oil members who interfered with the use of key national infrastructure, members of Just Stop Oil stated that "*direct action works*". **[UKOP17: pages 133-136]**

30. 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

31. As well as Just Stop Oil and Extinction Rebellion, there are other protest groups who are targeting companies and organisations affiliated with the oil and gas industry, including the following:

- (a) On 21 January 2025, it was reported by the Insurance Times that members of the activist group 'Shut the System' had sabotaged the fibre optic cables of major insurance companies in London, Leeds, Birmingham and Sheffield, causing disruption to their internet operations, targeted due to their work underwriting oil and gas activities. **[UKOP17: pages 137-141]**
- (b) As referenced at paragraph 26(d) above, a spokesperson for Just Stop Oil confirmed that the organisation was "*working with other [similar] groups...to develop a strategy for what comes next*". **[UKOP17: page 50]**
- (c) It is understood that 'Youth Demand' is an offshoot of Just Stop Oil's youth wing (as mentioned at paragraph 23 above) and the Standard reported on 5 April 2025 that members of the group had swarmed to block roads in central London in protest against (inter alia) "*the development of new oil and gas projects*". Youth Demand has threatened to take part in disruptive protests, including to "*shut down*" London until its climate goals are met. **[UKOP17: pages 142-152]**
- (d) The website for 'Youth Demand', as referred to above, further states that the organisation "*will be in nonviolent resistance against this rigged political system*" **[UKOP17: pages 153-155]**
- (e) In March 2025, members of the activist group Citizen's Arrest Network ("**CAN**") targeted senior personnel at oil and gas companies by confronting them in public and attempting to hand them legal documents purporting to be "*indictment papers*" and "*evidence dossiers*" and which detail crimes that CAN allege the individuals have committed in their capacity as senior members of their companies. These individuals include the CEOs of Shell, EnQuest and Serica Energy. On its social media profiles CAN is publicising direct altercations close to the workplaces of oil and gas employees to its approximately 17,900 followers **[UKOP17: pages 156-157]**. On 5 April 2025, The Guardian reported that an activist involved in Extinction Rebellion "*helps run the Citizens Arrest Network*". **[UKOP17: pages 158-164]**
- (f) It has been reported by the Times and the Guardian that some members of Just Stop Oil and Extinction Rebellion have splintered off to join other activist groups such as the Citizens Arrest Network and Youth Demand **[UKOP17: pages 5 and 163]**. On 5 May 2025 Youth Demand posted on its X account that "*This summer Youth Demand and Just*

Stop Oil are running a joint 6-week training course to build the generation of revolutionary organisers we need". [UKOP17: page 165]

(g) Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right to protest and training videos relating to direct action. **[UKOP17: pages 166-168]**

32. The announcement made by Just Stop Oil does not mean that it or its members will not undertake further disruptive activity whether under the title of Just Stop Oil or similar groups or organisations. Though the names and tactics may change and evolve, the evidence in this statement demonstrates that for a number of the activists the primary objective remains disruptive demonstrations against organisations they believe stand opposed to their demands, which includes oil and gas companies such as the Claimants.

33. The materials that have been published on Just Stop Oil's website, as well as the evidence outlined above, continue to indicate that oil and gas companies will remain a target of Just Stop Oil, Extinction Rebellion and other environmental campaign groups' campaigns. Consequently, there remains a risk to the Claimants' sites which the Final Injunction granted in its current terms protects against.

OTHER INJUNCTION PROCEEDINGS

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

(a) The injunctions granted to oil and gas companies in relation to protests against the industry, as set out at paragraph 45 of my Fourth Witness Statement, paragraph 28 of my Fifth Witness Statement and paragraph 59 of my Sixth 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 most recent review hearing on 17 October 2025 the Court upheld the injunction.
QB-2022-001241	Shell Haven Site	Shell UK Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029

			<p>subject to annual review on each year.</p> <p>At the most recent review hearing on 17 October 2025 the Court upheld the injunction.</p>
QB-2022-001420	Petrol filling station	Shell UK Oil Products Limited	<p>Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review on each year.</p> <p>At the most recent review hearing on 17 October 2025 the Court upheld the injunction.</p>
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	<p>Final injunction granted on 29 January 2024 until 11 July 2028 subject to annual review on 18 July of each year.</p> <p>At the most recent review hearing on 9 July 2025 the Court upheld the injunction.</p>
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	<p>Final injunction granted until 13 December 2028 or further order in the meantime following a hearing on 17 January 2024.</p> <p>At the most recent review hearing on 24 January 2025, the Court upheld the injunction.</p>

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

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 terminal; and Oikos' Canvey Island terminal	Thurock Essex Council	A final injunction up until and including 12 July 2029, subject to an annual review hearing. However, the Claimants did not seek an extension of the Injunction at the annual review.
QB-2021-003576 QB-2021-003626 QB-2021-003737	M25, M25 feeder roads and Kent roads	National Highways	Injunction expired at 23:59 on 10 May 2025.
QB-2021-003841	Multiple A roads, bridges and tunnels in London	Transport London for	Final injunction until 2 May 2028. At a hearing in January 2025, the Court upheld the injunction subject to annual review in respect of named defendants who had not offered undertakings to the Court and in respect of Persons Unknown.
KB-2022-003542	Multiple Roads, bridges and tunnels in London	Transport London for	Final injunction until 2 May 2028. At a hearing in January 2025, the Court upheld the injunction subject to annual review in respect of named defendants who

			had not offered undertakings to the Court and in respect of Persons Unknown.
KB-2024-002210	Heathrow Airport	Heathrow Airport Limited	<p>Final injunction granted until July 2029, subject to review.</p> <p>At the most recent review hearing, in June 2025, the Court upheld the injunction.</p>
KB-2024-002336	Gatwick Airport	Gatwick Airport Limited	<p>Injunction granted on 19 July 2024 until 19 July 2025, extended by 12 months on 18 July 2025.</p>
KB-2024-001765	London City Airport	London City Airport Limited and Docklands Aviation Group Limited	<p>Injunction granted on 20 June 2024 until 20 June 2029, final determination or further order in the meantime.</p> <p>At the most recent review hearing in June 2025, the Court upheld the injunction.</p>
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	<p>Injunction granted on 5 July 2024 with immediate effect.</p> <p>At the most recent review hearing of June 2025, the Court upheld the injunction.</p>
KB-2024-002473	Bristol Airport and Liverpool Airport	Birmingham Airport Limited, Liverpool Airport Limited, Peel L&P Investments (North) Limited, Bristol Airport Limited,	<p>Injunction granted on 6 August 2024 with immediate effect.</p> <p>At the most recent review hearing of</p>

		South West Airports Limited and Bristol Airport Developments Limited	June 2025, 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 2025, 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 granted on the 14 August 2024 until 14 August 2029. The first annual review hearing is set for 22 October 2025.

35. In relation to the injunction obtained in respect of London Stansted Airport, Manchester Airport and East Midlands International Airport in July 2024 and which was upheld at the recent review hearing in June 2025, the Claimants' instructed solicitors have shared with me the evidence that was made available to the Court for that review hearing, and which is in the public domain. Of particular note is the fact that on 21 May 2025, London City Airport received intelligence information from the Metropolitan Police of a protest by environmental protest groups which had been planned at Heathrow Airport to be held at the Sofitel Hotel on 20 May 2025, where an annual general meeting for Shell was being held and which was within the red line boundary of the injunction obtained by that airport. The emails from the police which were produced in evidence state that the protest was relocated to the Shell head office "*in order to avoid the risk of associated penalties for breaching the injunction*". The emails from the police go on to say that "*the injunction at [Heathrow Airport] had a real impact on the Shell protest yesterday [...] To remove an injunction now would open up to further protest and whilst JSO have stepped down there appears to be a cycle of new groups emerging and this cannot be ruled out so maintaining it would be very much recommended.*" [UKOP17: pages 169-171]

36. At paragraph 58 of my Sixth Witness Statement, I set out why the targeting of airports is a concern for the Claimants. In particular, as Mr Peter Davis refers to at paragraphs 16 - 21 of his first witness statement dated 7 April 2022, 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. Protests at either of the Sites therefore have the potential to impact the airports at Luton and the Midlands airports as well as

Heathrow and Gatwick (which have already been a target, see paragraph 35 of my Sixth Witness Statement and paragraph 34 above).

SUMMARY

37. The evidence set out above, as well as that in my Previous Witness Statements, demonstrates that there continues to be a significant threat posed by Just Stop Oil, Extinction Rebellion, as well as other environmental campaign groups, and which continues to target those affiliated with the oil and gas industry.
38. Despite the statements given by Just Stop Oil of late, there is no clear end date to the action of Just Stop Oil, Extinction Rebellion or other such organisations, with those organisations focusing on changing their names and members and evolving tactics, in continued efforts to meet their aims and demands.
39. As referred to 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 Order continuing, there is a real risk of imminent trespass and / or interference with the private access routes in relation to the Sites.
40. 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, as well as by other environmental groups, as outlined at paragraph 36 above.
41. Consequently, the Claimants are applying for the Final Injunction to remain in place in its current form until 23:59 hrs on 20 October 2028, subject to the annual reviews provided for at paragraph 12 of the October 2023 Order.

PROCEEDINGS

42. 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 Sixth Witness Statement (or at all). The Claimants' solicitors have also confirmed to me that no Defendant has ever engaged with these proceedings.

APPLICATION DATED 24 OCTOBER 2025

43. The following paragraphs of my statement relate to, and are made in support of, the Application.
44. As set out in this statement, there continues to be activity targeted at industries and organisations that members of Just Stop Oil and Extinction Rebellion consider to be affiliated with the oil and gas industries, however, it is clear from the evidence that such activity is not limited to those organisations. For example:
 - (a) It was "XR North", as opposed to Extinction Rebellion itself, which stated that Extinction Rebellion's occupation of the Manchester office of Marsh was due to Marsh "*funding our destruction*" by *insuring fossil fuel projects*" (see paragraph 22 of this statement).

(b) On 6 June 2025, it was reported in relation to Youth Demand (rather than Just Stop Oil) that "*activists from the supposedly disbanded group [Just Stop Oil]...were playing a central role in recruiting new members to Youth Demand to help its goal of bringing London to a halt*" (see paragraph 23 of this statement).

45. Furthermore, as outlined at paragraph 31 of this statement, there are other protest groups, unrelated to Just Stop Oil and / or Extinction Rebellion (but who admit to having similar aims) which are targeting companies and organisations affiliated with the oil and gas industry, including (inter alia): "Shut the System", "Citizen's Arrest Network" and "Fossil Free London", and which, as such, now pose a threat to the Sites currently protected by the Final Injunction.

46. When considered collectively, the evidence in this statement suggests that there is a strong possibility that members of Just Stop Oil, Extinction Rebellion and / or other environmental campaigns will continue to undertake direct action whether operating under the banner of Just Stop Oil or Extinction Rebellion, or under the guise of a group or organisation with the same aim and goals but a different name. The Claimants are therefore concerned about the possibility of:

- (a) the membership of Just Stop Oil and / or Extinction Rebellion evolving into a different organisation or campaign and undertaking unlawful activity at the Sites which (absent the Claimants being able to prove a connection to or affiliation with the Extinction Rebellion campaign or the Just Stop Oil campaign) would not be caught by the terms of the Final Injunction; or
- (b) an organisation or campaign with the same aim and goals as Just Stop Oil and / or Extinction Rebellion undertaking unlawful activity at the Sites which would not currently be prohibited by the terms of the Final Injunction.

47. The Claimants have therefore made the Application for the Court's permission to amend the description of the Defendants on the Claim Form and Particulars of Claim and that the October 2023 Order is amended accordingly to include "*or other environmental campaign*" in order not to frustrate the purpose of the Final Injunction.

48. The Application has been made by the Claimants following the Claimants having become aware from their Instructed Solicitors of similar applications being successfully made in other final injunction cases such as the Esso case referred to at paragraph 27(a) above.

49. For all of the reasons above, the Claimants seek the Court's permission in the Application to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the October 2023 Order be amended to change the description of the Defendants accordingly.

50. As set out at paragraph 13 of this statement, the provisions of the October 2023 Order were varied pursuant to the November 2024 Order to the effect that paragraph 6(b) of the October 2023 Order be 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.

51. A consolidated version of the October 2023 Order was not made following the November 2024 Order. However, in light of the Application, and for ease of reference:

- (a) the amendments to the October 2023 Order made pursuant to the November 2024 Order are shown in red coloured text on the draft Order forming part of the Claimants' Application; and

(b) the amendments sought pursuant to the Claimants' Application are shown in green coloured text on the draft order.

52. In addition, the amendments sought pursuant to the Claimant's Application are shown in red coloured text in both the Claim Form and the Particulars of Claim.

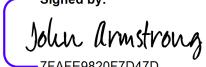
CONCLUSION

53. For the reasons set out in this statement and the Previous Witness Statements, I respectfully request that the Final Injunction granted by the October 2023 Order continues and that the Application is granted in the terms sought.

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 by:

Signed:.....7FAFE9B20F7D47D..... Dated:

24-10-2025 | 18:59:04 BST

John Michael Armstrong