On behalf of: the Claimants

Made by: Jonathan Peter Barden

Exhibit: JB2

Made on: 4 May 2023

IN THE HIGH COURT OF JUSTICE **Claim No PT-2022-000326**

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

PROPERTY TRUSTS AND PROBATE LIST

BETWEEN:

(1) ESSAR OIL (UK) LIMITED
(2) STANLOW TERMINALS LIMITED
(3) INFRANORTH LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN ENTER OR REMAIN, WITHOUT THE FIRST CLAIMANT'S CONSENT, ON THE FIRST CLAIMANT'S LAND AT STANLOW MANUFACTURING COMPLEX, ELLESMERE PORT, CH65 4HB SHOWN EDGED RED (SAVE FOR THE AREAS HATCHED BLUE AND ORANGE) ON THE ATTACHED 'STANLOW PLAN'

(2) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN OBSTRUCT OR OTHERWISE INTERFERE WITH THE FIRST CLAIMANT'S ACCESS OVER AND ALONG THE ROAD SECTION SHOWN SHADED YELLOW ON THE ATTACHED 'STANLOW PLAN'

(3) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION CAMPAIGN' OR THE 'JUST STOP OIL CAMPAIGN' OBSTRUCT THE VEHICULAR ENTRANCE AND EXIT TO STANLOW MANUFACTURING COMPLEX, ELLESMERE PORT, CH65 4HB, WHICH ARE SHOWN MARKED "A", "B" and "C" ON THE ATTACHED 'STANLOW PLAN'

(4) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN ENTER OR REMAIN, WITHOUT THE SECOND CLAIMANT'S CONSENT, ON THE SECOND CLAIMANT'S LAND AT (A) STANLOW MANUFACTURING COMPLEX, ELLESMERE PORT, CH65 4HB SHOWN HATCHED BLUE ON THE ATTACHED 'STANLOW PLAN' (B) TRANMERE OIL TERMINAL, ST PAUL'S ROAD, BIRKENHEAD SHOWN EDGED BLUE ON THE ATTACHED 'TRANMERE PLAN'

(5) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION CAMPAIGN' OR THE 'JUST STOP OIL CAMPAIGN' OBSTRUCT THE VEHICULAR ENTRANCE AND EXIT TO TRANMERE OIL TERMINAL, ST PAUL'S ROAD, BIRKENHEAD WHICH IS SHOWN MARKED "A" ON THE 'TRANMERE PLAN'

(6) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN ENTER OR REMAIN, WITHOUT THE THIRD CLAIMANT'S CONSENT, ON THE THIRD CLAIMANT'S LAND AT NORTHAMPTON OIL TERMINAL, 25 ST JAMES MILL ROAD, NORTHAMPTON NN5 5JN SHOWN EDGED RED (SAVE FOR THE AREAS EDGED BLUE) ON THE ATTACHED 'NORTHAMPTON PLAN'

(7) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION CAMPAIGN' OR THE 'JUST STOP OIL CAMPAIGN' OBSTRUCT THE VEHICULAR ENTRANCES OR EXITS TO NORTHAMPTON OIL TERMINAL, 25 ST JAMES MILL ROAD, NORTHAMPTON

NN5 5JN SHOWN MARKED WITH AN "A" ON THE ATTACHED 'NORTHAMPTON PLAN'

Defendants

SECOND WITNESS STATEMENT OF JONATHAN PETER BARDEN

I, **JONATHAN PETER BARDEN**, of Essar Oil (UK) Limited, The Administration Building 5th Floor, Stanlow Manufacturing Complex, Ellesmere Port, Cheshire, CH65 4HB will say:-

1 I am the Chief Operating Officer of Essar Oil (UK) Limited (**"Essar"**) and I confirm that I am duly authorised to make this Witness Statement on behalf of Essar and its subsidiaries in this claim.

2 Within Essar I am responsible for all aspects of the operations undertaken at Stanlow Oil Refinery and Tranmere Oil Terminal to ensure that the petrochemical refining processes and equipment operate efficiently and safely. My role gives me a broad overview of all aspects of Essar's business, including those of its subsidiaries. I am aware of and qualified to comment on the potential impact on Essar's business and its subsidiaries caused by operational interruptions.

3 This statement has been prepared following discussions with Essar's solicitor and a review of protestor action against the oil and gas industry and the industry's response (including injunctive action) since my First Witness Statement dated 19 April 2022.

4 The facts and matters set out in this statement are within my own knowledge unless otherwise stated and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

5 There is now produced and shown to me a paginated bundle of true copy documents marked **"JB2"**. All references to documents in this statement are to **Exhibit JB2** unless otherwise stated.

Background

6 Paragraphs 9 to 33 of my First Witness Statement set out the details of oil refinery and oil terminal facilities which are owned by Essar and its relevant subsidiaries, being Stanlow Refinery, Northampton and Tranmere Terminals together with the terminal at Kingsbury in Tamworth which is owned and operated as a joint venture with Shell UK Limited (together the **"Sites"**). The ownership position in respect of the Sites as set out therein remains the same as at the date of this Witness Statement.

7 Paragraphs 44 to 52 of my First Witness Statement record details of the direct action which was being undertaken by groups known as Just Stop Oil and Extinction Rebellion at oil refinery and terminal facilities in England at the time of my statement.

8 Paragraphs 53-56 of my First Witness Statement set out the threat of direct action taking place at the Stanlow Refinery and the extra security precautions taken. Paragraphs 83-89 of my First Witness Statement set out the security precautions taken at the Northampton and Tranmere Terminals. Paragraphs 59-82 summarise my understanding of a number of incidents of direct action by "Just Stop Oil" and "Extinction Rebellion" which took place at the Kingsbury Terminal and Kingsbury Complex in March-April 2022.

9 Paragraphs 90-120 of my First Witness Statement set out the operational and financial impact that resulted from the risk of disruption by protestor action trespassing onto, or obstructing access to any one of the Sites.

10 In light of the real and imminent threat of direct action at the Sites and the potential consequences, the Claimants commenced these proceedings for an interim injunction to prevent persons unknown in connection with the 'Extinction Rebellion' and 'Just Stop Oil' campaigns, from entering or remaining on and from obstructing entrances and exits at Stanlow Refinery,

Northampton and Tranmere Terminals. As set out in paragraph 33 of my First Witness Statement, an injunction was not sought in respect of the Kingsbury in Tamworth Terminal as it was understood that separate legal proceedings seeking injunctive relief in relation to this Terminal were being pursued by Shell UK Limited and/or Warwickshire County Council.

11 On 21 April 2022, the Honourable Mrs Justice Bacon granted an interim injunction to prevent the Defendants from entering or remaining on or obstructing or interfering with access to the Stanlow Refinery, Northampton and Tranmere Terminals.

12 On 11 May 2022, at the return hearing, the Honourable Mr Justice Adam Johnson, extended this injunction until 11 May 2023.

13 I make this Witness Statement in supports of the Claimants' application to continue the injunction beyond 11 May 2023.

Injunctions against Protestor Action sought and obtained in 2022-2023

14 I am advised by our solicitors that there has been a significant volume of injunction applications in 2022-2023 by other operators in the oil and gas industry who, like the Claimants, have sought to prevent interference with their operations from unlawful direct action relating to protestor activity. The details of other successful injunction applications include:

Parties	Location	Case No.	Length of Injunction
Shell UK Oil Products Ltd v Persons Unknown	Various Shell-branded petrol stations	QB-2022-001420	12 months expiring 12 May 2023 Joint Application relating to all three Shell cases for extension to existing injunctions made on 30

			March 2023 and heard on 25 April 2023. Injunctions extended until 25 May 2023.
Valero Energy Ltd v Persons Unknown	Pembroke Refinery and Pembrokeshire Avonmouth, Cardiff, Plymouth, Kingsbury, Manchester Oil Terminals	QB-2022-000904	Extended in January 2023 for 12 months and three weeks
Esso Petroleum v (1) Breen and (2) Persons Unknown	Southampton-London Pipeline	QB-2022-002577	Extended in February 2023 pending judgment being handed down
Exolum Pipeline System and Others v Persons Unknown	Grays, Bramhall, Seal Sands, Misterton, Hallen, Thetford and Saffron Walden Oil Terminals	QB-2022-001142	Extended in January 2023 subject to a further review in February 2024
Shell International Petroleum Company Limited v Persons Unknown	Shell Centre Tower	QB-2022-001259	12-month injunction expired on 22 April 2023. Joint Application relating to all three Shell cases for extension to existing injunctions made on 30 March 2023

			and heard on 25 April 2023. Injunctions extended until 25 May 2023.
Shell UK Limited	Shell Haven Site	QB-2022-001241	12-month injunction expires on 27 April 2023. Joint Application relating to all three Shell cases for extension to existing injunctions made on 30 March 2023 and heard on 25 April 2023. Injunctions extended until 25 May 2023.

15 I am advised by our solicitors that there has also been injunctive action by National Highways Limited and local authorities in order to prevent protestor action obstructing roads and motorways within the immediate vicinity of oil refineries and terminals, including:

Parties	Location	Case No.	Length of Injunction
(1) Thurrock Council (2) Essex County Council v Madeline Adams and Others	Roads in the vicinity of Navigator Terminals; Thurrock Terminal; Purfleet Terminal; Grays Terminal and	KB-2022-001317	Until further order with provision for the Claimants to inform the Court within 28 days of the Supreme Court judgment in Case UKSC/2022/0046

	Canvey Island Terminal		
North Warwickshire County Council v David Baldwin and Others	Kingsbury Terminal	KB-2022-001236	Until further Order. An application was made by the Council in March 2023 to make directions for a final hearing to make a Final Order.
National Highways v Persons Unknown and Others	M25, M25 Feeder Roads and Kent Road	KB-2021-003576 KB-2021-003626 KB-2021-003737	12-month injunction expiring on 9 May 2023. An application for a continuation of the existing injunction, for a period of 12 months, was made on 13 April 2023 and heard on 24 April 2023. Judgment was reserved and will be handed down on 5 May 2023.
National Highways v Persons Unknown and Others	Activities involving gantries and other structures over under or adjacent to M25 motorway	KB-2021-004333	12-month injunction expiring 15 November 2023

Reasons for seeking the Injunction

16 In the conclusion to my First Witness Statement, I summarised the reasons for which the Claimants sought an injunction in these proceedings as follows:

16.1 Essar and its subsidiaries are required to comply with very strict health and safety regulations and there is a real risk of persons trespassing onto and entering any of the Sites being endangered or exposed to dangerous substances (as explained more fully at paragraphs 34-43 of my First Witness Statement).

16.2 The threat of protests being undertaken by Just Stop Oil and Extinction Rebellion presents a real risk of interference and disruption to Essar's business operations at the Sites. Essar retains a dedicated security team at the Stanlow Refinery and previously engaged a specialist enforcement firm (County Enforcement Limited), at a large financial cost to Essar, to deal with any protest action at the Sites.

16.3 In addition, Essar's security team are in constant dialogue with the local police force as regards monitoring current threats. I understand that police patrols were increased last summer in response to the threat of protest activity and were posted close to Essar's Northampton Terminal.

16.4 Direct action by protestors would inevitably impact on Essar's ability to continue to supply products, which are required in the public interest. In particular, the Stanlow Refinery provides over 16% of the total UK road transport fuels market annually (as explained more fully at paragraphs 93-95 of my First Witness Statement).

17 I confirm that the reasons set out above remain valid as at the date of this Witness Statement.

Continued Threat

18 I can confirm that fortunately since the injunction was granted on 21 April 2022 and extended on 11 May 2022, there have been no breaches of the

injunction in these proceedings. This is viewed by the Claimants as evidence of the effectiveness of the injunction.

19 The Claimants' position however is that the threat of protestor action remains and that further injunctive relief is required, if not there is a real risk that one or more of the Sites could be subject to substantial interference by protestors.

20 In support of this position and the Claimant's application to extend, I will address the following in the remainder of this Witness Statement:

20.1 Renewal of others' Injunction Applications and Breaches of Injunctions

20.2 The Threat to Oil Terminals and Refineries and the general Oil and Gas Industry

20.3 Continued General Protestor Activity

Renewal of Others' Injunction Applications and Breaches of Injunction

21 I firstly refer back to the tables set out above which evidence that other operators in the oil and gas industry have sought extensions to injunctions and these have been granted. Similarly, such extension applications are also being made by National Highways to continue to protect crucial associated road networks and judgment is due to be handed down on 5 May 2023.

22 These applications for extensions indicate that other key organisations within the oil and gas industry share the Claimants' view of the continued threat that the industry faces from protestor action and that the industry remains a target.

23 This is also evidenced by the fact that, whilst the Claimant has suffered no breaches of the injunction in these proceedings, other operators have done. Injunctions therefore remain an important tool to address such direct disruptive action.

24 In particular, I refer to the following breaches:

24.1 In July 2022, Extinction Rebellion led a protest outside Plymouth terminal in breach of the Order granted to Valero Energy Ltd (Claim No. QB-2022-000904, see paragraph 15 above).

24.2 In August 2022, a protestor dug a pit next to the M25 in Chertsey Surrey and spent 24 days in it, in breach of the Order granted to Esso Petroleum (Claim No. QB-2022-002577, see paragraph 15 above). On 6 September 2022, the protestor was jailed for 112 days.

24.3 On 24 August 2022, Just Stop Oil members sat on the road at Thurrock Motorway Services, Grays, Essex in breach of the Order granted to Thurrock Council and Essex County Council (Claim No. KB-2022-001317, see paragraph 15 above). The campaigners received suspended sentences on 18 November 2022.

24.4 On 14 September 2022, 14 Just Stop Oil protestors campaigned outside of Kingsbury Oil Terminal in breach of the Order granted to North Warwickshire County Council (Claim No. KB-2022-001236, see paragraph 15 above). On 21 September 2022, the protestors appeared in Birmingham County Court; one supporter was jailed, five were remanded and eight were given suspended sentences.

25 A collection of news articles reporting on the injunction breaches set out above are at pages 1-16 of **JB2**.

The Threat to Oil Terminals, Refineries and the Oil and Gas Industry

26 Following the grant of the injunction in these proceedings there has remained a threat to oil terminals and refineries across England and Wales and the general oil and gas industry. This is evidence by the following incidents:

26.1 On 19 July 2022, protestors gathered outside various Nottingham petrol stations calling for action on fossil fuels and a boycott from Nottingham residents using Shell and BP.

26.2 On 28 July 2022, Extinction Rebellion activists carried a coffin containing a world on fire to demonstrations at petrol stations in Leicestershire.

26.3 On 24 August 2022, Extinction Rebellion targeted the University of Cambridge's Chemistry department and a Shell petrol station; their actions included climbing the roof of the petrol station to hang a protest sign.

26.4 On 24 August 2022, protestors from an Extinction Rebellion affiliated group blocked Cobham and Clacket Lane service stations on the motorway smashing fuel pumps and forcing the stations to close with 20 arrests made.

26.5 On 26 August 2022, Just Stop Oil protestors blocked entrances to various central London petrol stations, glued themselves to pumps and vandalised signs with spray paint.

26.6 On 3 September 2022, Extinction Rebellion protestors gathered outside a Shell Garage in London Apsley lying under body sheets to represent those killed by climate change and others were dressed as Shell executives throwing cash around and spilling "oil" from a teapot.

26.7 On 25 April 2023, Extinction Rebellion protestors marched across London to demonstrate on the impact of fossil fuels including visiting the Shell Headquarters on the Southbank.

27 A collection of articles which provide an overview of the incidents described in the preceding paragraphs together with Twitter posts is attached at pages 17-45 of **JB2**.

Continued Protestor Activity

28 There has also been consistent and repeated protestor activity at other venues not directly used with the oil and gas industry but with a continued

message that such action is in protest to the industry. I refer to the following examples:

28.1 On 2 September 2022, climate protestors glued themselves to chairs around the Speaker's chair in the House of Commons and others locked themselves by their necks to railings outside Parliament in protest of the climate crisis.

28.2 On 14 October 2022, Just Stop Oil activists threw tomato soup over the Vincent Van Gogh Sunflowers at the National Gallery in London.

28.3 On 8 December 2022, the Aberdeen Energy Awards were gate-crashed by Extinction Rebellion and Just Stop Oil activists protesting against the 'greenwashing' of the Shell sponsored event.

28.4 On 28 February 2023, Extinction Rebellion and HS2 Rebellion disrupted the offices of law firm Eversheds Sutherland (International) LLP in Nottingham by gathering outside in hazmat suits and spraying fake oil at the premises. Similar action has been taken by protestors at the firm's other UK offices. This has included spray-painting 'Cut the Ties to Fossil Fuels' on the Birmingham premises, spraying oil and protestors gluing themselves to the Cardiff offices and demonstrating with white masks and fake blood outside of the London offices.

28.5 On 30 February 2023, Extinction Rebellion disrupted debates in the House of Lords of new protest laws and were escorted out of the public gallery.

28.6 On 25 March 2023, a Barclays Bank in Leeds city centre was sprayed with orange paint by protestors supporting Just Stop Oil who were demanding an end to fossil fuel lending by banks.

28.7 On 10 April 2023, Just Stop Oil supporters were arrested at the Herbert Museum in Coventry when demanding action by employees and directors of UK cultural institutions against the government's policies and plans for over 100 new fossil fuel projects.

28.8 On 17 April 2023, at the World Snooker Championship, supporters of Just Stop Oil climbed onto the snooker tables and threw paint, calling on sporting institutions to join in the resistance against new UK fossil fuel projects.

29 A collection of articles which provide an overview of the incidents described in the preceding paragraphs and further Twitter posts are attached at pages 46-82 of **JB2**.

Current Position of Just Stop Oil and Extinction Rebellion

30 The evidence in this Witness Statement demonstrates the continued protestor activity by Just Stop Oil and that the group remains committed to causing disruption to the oil and gas industry.

31 This is also the case for Extinction Rebellion. Further, whilst it was stated by the group on 1 January 2023 that it was making "*a controversial resolution to temporarily shift away from public disruption as a primary tactic*" (emphasis added), it confirmed that it must still be "*radical in* [its] *response*" and "*determined in* [its] *efforts to address the climate and ecological emergency."* A full copy of the statement is at pages 83-84 of **JB2**.

32 As such, the Claimant's position is that action from both groups remains an ongoing threat to the Sites.

Conclusion

33 As evidenced in this Witness Statement, the Claimant's position is that protestors are committed to disruptive direct action against the oil and gas industry, including the Claimant's activities at the Sites. Accordingly, an extension to the current injunction in these proceedings is sought.

34 The current injunction has been effective in deterring incidents of trespass or other unlawful activity at any of the Sites and that protection is required to be retained in order to avoid exposure to any direct action by Just Stop Oil or Extinction Rebellion groups going forward.

35 I therefore support the application for an order for further injunctive relief injunction in these proceedings to be made.

Statement of Truth

I believe that the facts stated in this 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: 4 May 2023

Jonathan Peter Barden

On behalf of: the Claimants

Made by: Jonathan Peter Barden

Exhibit: JB2

Made on: 4 May 2023

CLAIM NO PT-2022-000326

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
PROPERTY TRUSTS AND PROBATE LIST
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(3) INFRANORTH LIMITED

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Defendants

SECOND WITNESS STATEMENT OF JONATHAN PETER BARDEN

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