CCSA Subsurface and Storage Working Group Meeting (UK)

15 July 2025

10:00 – 12:00 (BST)

CCSA

Agenda

Nr.	Time	Item	Presenter
1.	**10:00am** (10 mins)	**Introductions & Housekeeping**	**Matthew Booth**
2.	**10.10am** (20 mins)	**CCSA Updates and Policy Overview**	**Beth Hebditch**
3.	**10:30am** (up to 1 hour)	**DESNZ Presentation and Engagement session: Post Implementation Review of the Storage of Carbon Dioxide Regulations**	**Viv Collins & team -** DESNZ CCUS Strategy and Policy Directorate
4.	**11:30am** (25 mins)	**CCSA response to the NSTA consultation on proposals to introduce new and amended fees**	**Beth Hebditch**
5.	**11.55am** (5 mins)	**AOB and meeting close**	**Matthew Booth**

House Keeping & Introductions

- This meeting is being recorded
- Slides and recording will be available for members after the meeting
- CCSA Competition Law Policy notice is attached to the meeting invite
- If you are not speaking, please mute your microphone
- Please **raise your hand** if you wish to comment, you will be invited to come off mute, if you can also turn on your camera.
- *We encourage questions to be saved until the end of the presentations where there will be dedicated time for Q+A.*
- Please also pose any **comments in the chat** and these will be picked up by the secretariat

CCSA updates and policy overview

Beth Hebditch – CCSA Head of UK Policy

- Terms of reference for the group
- Policy updates: Spending Review, Infrastructure Strategy, Trade Strategy, Industrial Strategy
- Policy mapping: timeline of expected policy updates

CCSA

Terms of Reference

Mission

The UK Subsurface and Storage Working Group is committed to addressing key industry issues and developments related to CO2 storage, with the aim of accelerating the development of the CCUS sector in the UK. The Group convenes leading stakeholders and experts to provide insights and evidence to government, regulators, and the wider market, supporting efforts to overcome current barriers and promote the establishment and growth of the CCUS industry.

Objectives

- Convene experts from technical, regulatory, commercial and legal perspectives to develop a detailed understanding the UKs evolving CO2 storage landscape.
- Develop common industry positions and influential policy papers to shape CCUS policy development.
- Identify risks, technical challenges and administrative barriers to help work towards a streamlined policy and regulatory landscape.
- Respond to Government consultations with a unified industry voice to influence the development of UK CO2 storage.
- Disseminate information and materials to raise the profile of UK CO2 storage developments within the CCSA membership and, where appropriate, across the wider industry.
- Provide a trusted, industry-led forum that Government and external stakeholders (for e.g. NSTA, The Crown Estate), can readily engage for detailed policy expertise.
- Ensure alignment with external groups (for e.g. NSTA CCUS Taskforce, Subsurface Taskforce, The Crown Estate Co-location Forum).

Draft ToR were circulated after the kick-off meeting. Considered adopted.

Policy Updates

[11 June] CSR & key CCUS Funding Announcements

- **£9.4 billion capital funding allocated over the Spending Review period**
- Funding to build out **East Coast Cluster** and **HyNet** (North East Wales & Merseyside) and fill storage capacity
- Development funding for Acorn and Viking CCS; final investment decision this Parliament, subject to readiness and affordability
- Focus on filling existing storage capacity and advancing Acorn and Viking CCS
- This funding contributes toward the £21.7bn commitment to Carbon Capture made last October for the next 25 years

[19 June] Infrastructure Strategy

- Reconfirms £9.4bn for CCS Support and £500m for hydrogen infrastructure
- £725 bn of Government Funding for Infrastructure over the next decade.
- Reasserts importance of CCUS in industrial decarbonisation.
- NISTA to Publish New Infrastructure Pipeline Portal

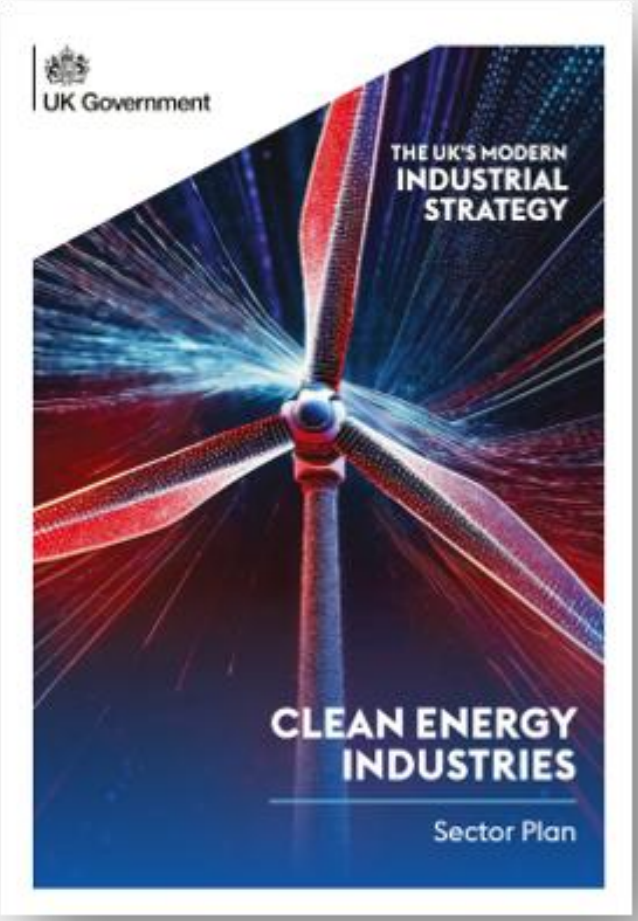
Policy Updates

[23 June] Industrial Strategy Headlines & Clean Industries Sector Plan

- '**CCUS inc. GGRs**' identified as one of six "**Frontier Clean Energy Industries"**
- Reaffirms £9.4bn in capital budgets over the spending review period.
- Welcomes the industry-led voluntary ambition of 50% UK local content for CCUS across the Value Chain from 2030.
- Commits to working with the EU to agree a regulatory framework for enabling cross-border CO_2 .
- Supports the development of a Hydrogen & CCUS Skills Curriculum
- Targets public investment including £1 bn GB Energy Clean Energy Supply Chain Fund and confirming £27.8bn National Wealth Fund, with at least £5.8bn targeting CCUS.

[26 June] New Trade Strategy inc. support for Clean Energy Exports

- Mutual recognition of professional qualifications
- Strengthening of clean energy and green trade agreements
- Increased funding for UK Export Finance



Status of UK CCUS

Hynet and ECC

- Oct 24: £21.7 billion, over 25 years, to support 5 projects between Hynet and East Coast Cluster.
- FIDs:
  - Dec 2024 Net Zero Teesside (NZT) Power and Northern Endurance Partnership (NEP)
  - March 2025 Liverpool Bay

'Filling the Storage Capacity'

- Part of £9.4bn in the Spending Review to build out projects to fill the transport and storage infrastructure
- **Awaiting Publication of Project Negotiation List**

Viking and Acorn

- Part of £9.4bn for development funding for Acorn and Viking CCS.
- Final investment decision this parliament, subject to readiness and affordability.
- **Discussions ongoing in relation to next steps**

Other UK Clusters and Projects

- Market transition consultations expected second half of this year
- National Wealth Fund (NWF) engaged with sector. Last week, NWF announced a £28.6 million equity investment in the Peak Cluster, a significant step forward in decarbonising the UK's cement and lime industries through CCUS.
- **Needing transparent and predictable allocation frameworks.**
- **Development of wider market drivers - E.g. Cross-Border, GGRs, UK ETS and CBAM, low carbon product markets**

Upcoming workstreams and publications* (market transition)

Call for Evidence: CCUS Future Networks *(DESNZ)*

- Network market transition
- Steps needed to advance network development towards a self-sustaining CCUS sector
- Challenges for future progression of CCUS networks

Consultation: Non-Pipeline Transport *(DESNZ)*

- Will set out policy proposals to support NPT deployment
- Aims to provide NPT projects with information on key commercial areas to focus on
- Policy proposals to support NPT costs, risk allocation and economic licensing

Publication: The Consenting Lifecycle of Marine Geological CO_2 Stores *(DESNZ)*

- For information purposes
- Outline the roles and responsibilities of organisations involved in the consenting lifecycle of marine geological carbon dioxide storage in the UK

Call for Evidence: Evolution of economic regulation for CO2 storage *(DESNZ & Ofgem)*

- Long-term use of the Regulated Asset Base model of economic regulation for storage
- Evidence on natural monopolies for CCUS, storage competition and costs, and equity and debt investment considerations

Consultation: CCUS Third Party Access *(DESNZ)*

- Amendments to *Storage of Carbon Dioxide (Access to Infrastructure) Regulations*
- Amendments to ensure fit for purpose regulations to enable CO2 T&S networks
- Provide long-term sustainability access to CCUS infrastructure

Report: Post Implementation Review of the Storage of Carbon Dioxide Regulations *(DESNZ)*

- For information purposes
- The PIR report to be produced for these regulations, will answer the questions set out in their review provisions and will provide the analysis to support decisions about the next steps with the regulations

** Indicative, subject to change*

Post Implementation Review of the Storage of Carbon Dioxide Regulations

Viv Collins – CCUS Strategy and Policy Directorate

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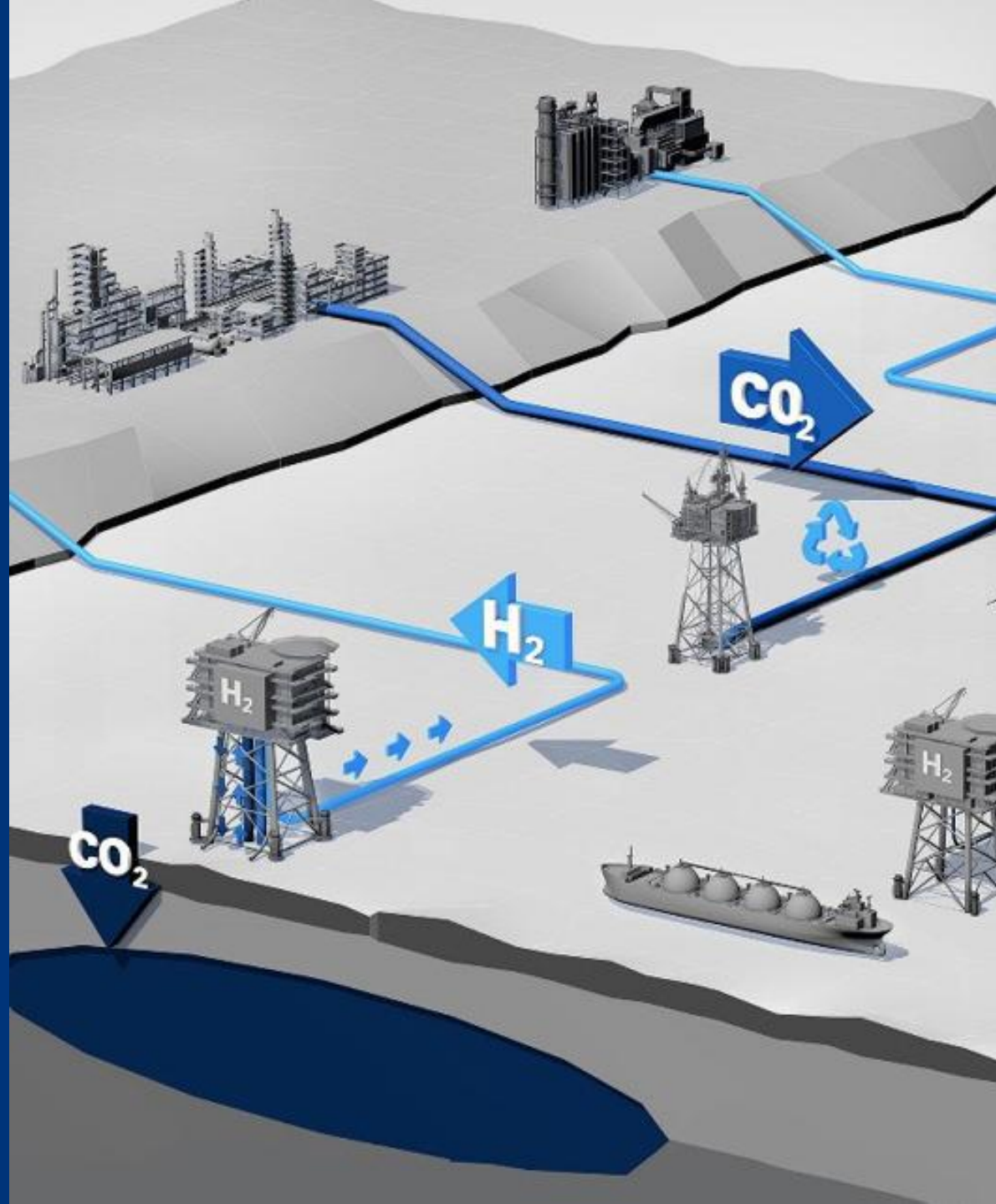
Department for Energy Security & Net Zero

Post-implementation Review (PIR)

The Storage of Carbon Dioxide Regulations



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Carbon Capture, Usage and Storage

The Storage of Carbon Dioxide Regulations

DISCLAIMER: The details, as set out in this presentation and subsequent documents, in whatever form they are expressed, are indicative and for discussion only. They do not constitute an offer by government and do not create a basis for any form of expectation or reliance.

This discussion is intended to gather preliminary views only and does not constitute a consultation with legal, regulatory or other effect. The Department for Energy Security and Net Zero (DESNZ) will not be publishing any feedback received or our responses, but we reserve the right to respond to feedback individually to discuss points raised. Further, we cannot guarantee that any feedback provided will be reflected in the Storage of Carbon Dioxide Regulations and Government reserves the right to alter, remove or add to any or all of the proposals set out, for any reason.

Parties are expected to get their own financial and legal advice.

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Contents

1. Agenda

The aim of this slide deck is to:

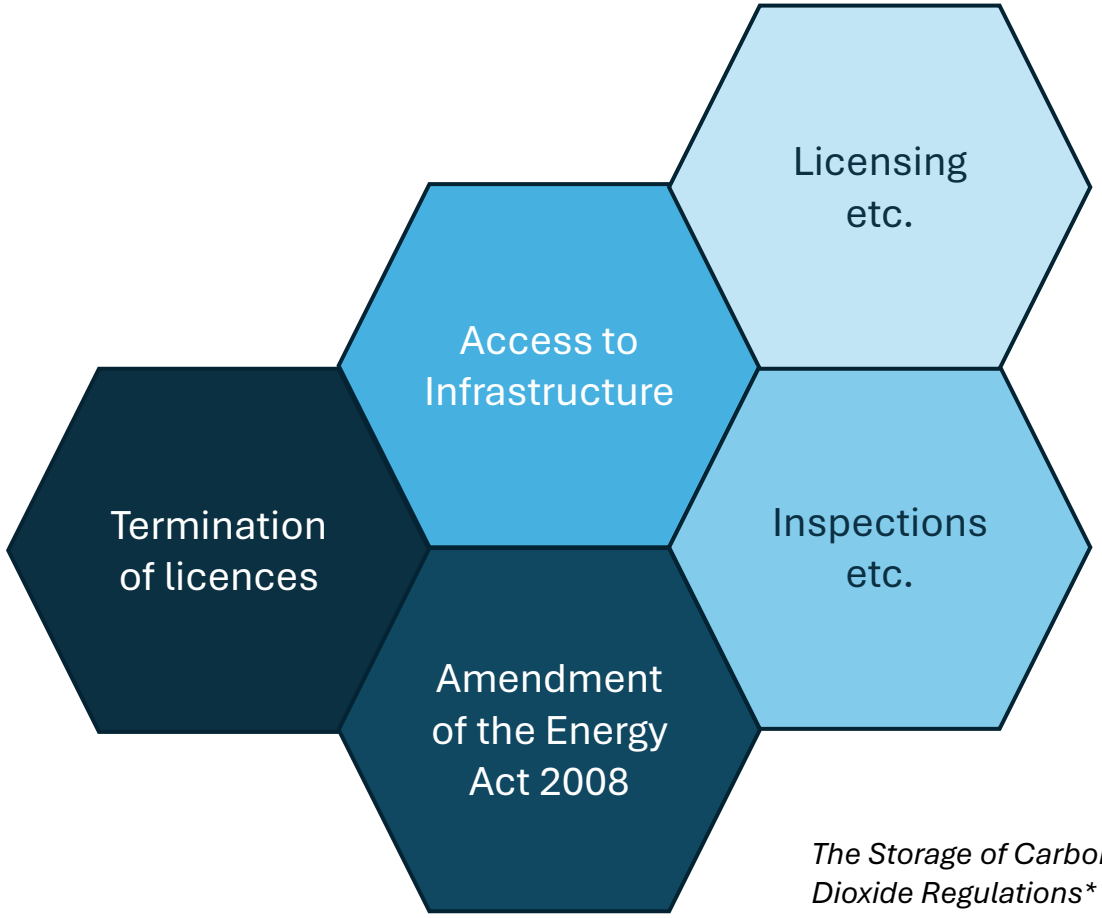
- Hold an Engagement Session to discuss the Post Implementation Review (PIR) of the Storage of Carbon Dioxide Regulations and seek feedback from industry on subjects relating to the legislation.

The presentation sets out:

- An overview
- PIR background and objectives
- The PIR process
- Context - PIR questions for industry on legislation-related subjects
- Discussion and Questions

2. Overview

- A **Post Implementation Review (PIR)** is a process to assess the **effectiveness** of a regulation after it has been implemented and operational for a period of time.
- We have identified <u>five</u> sets of regulations for the **Storage of Carbon Dioxide** that require a PIR.
- We have identified several issues we are seeking industry's views on, which have been identified from other reviews/sources.



The Storage of Carbon Dioxide Regulations requiring review.*

*These regulations concern powers under the Energy Act 2008, which established the North Sea Transition Authority and devolved governments as the relevant licensing authorities for the storage of carbon dioxide.

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3. Background and objectives

3.1 PIR objectives - The Storage of Carbon Dioxide (Licensing etc.) Regulations 2010

Regulation	Objective
The Storage of Carbon Dioxide (Licensing) Regulations 2010	These regulations implement the licensing regime for carbon storage, enabled under the **Energy Act 2008**, which assigns the NSTA and Devolved Administrations as the relevant licensing authorities. They set out the licensing procedures, operational compliance standards, and long-term stewardship responsibilities for storage site operators, including closure and post-closure obligations, to ensure environmental integrity and regulatory certainty for industry stakeholders. There are separate, **equivalent regulations for Scotland and Northern Ireland.**

3.2 PIR objectives - The Storage of Carbon Dioxide (Amendment of the Energy Act 2008) Regulations 2011

Regulation	Objective
The Storage of Carbon Dioxide (Amendment of the Energy Act 2008) Regulations 2011	These regulations implement Article 27 of the **CCS Directive** and many articles more generally. 1. They **extend the geographical scope of the prohibition on carrying out carbon dioxide storage activities without a licence** under Part 1, Chapter 3 of the Energy Act 2008. The prohibition was extended so that it applies onshore. 2. **Ensure comprehensive oversight** by broadening the definition of a "controlled place" to cover internal waters adjacent to relevant UK territories. 3. **Amend the Pipe-line Works (Environmental Impact Assessment) Regulations 2000** to ensure that EIAs apply to carbon dioxide transport pipelines, including booster stations. 4. **Align domestic legislation** with the EU's Carbon Capture and Storage (CCS) Directive to maintain high environmental and safety standards. 5. **Support UK climate objectives** by strengthening the legal framework for safe, regulated geological storage of CO_2 from industrial sources.

3.3 PIR objectives - The Storage of Carbon Dioxide (Termination of Licences) Regulations 2011

Regulation	Objective
The Storage of Carbon Dioxide (Termination of Licences) Regulations 2011	These regulations set out the requirements for the transfer of responsibility to the State for a closed storage site and the associated financial mechanism the Government will require before accepting responsibility. Their main objectives are to: 1. **Implement Articles 18 and 20 of the EU Directive 2009/31/EC**, relating to the termination of storage site licences and the transfer of responsibility for closed CO_2 storage sites to the competent authority. 2. **Ensure environmental protection** by setting out clear procedures for when and how a licence for CO_2 storage can be terminated, particularly after a site has been closed and deemed safe. 3. **Establish financial mechanisms** to cover long-term monitoring and potential remediation after the operator's responsibility ends. 4. **Provide legal clarity for operators and regulators** on the conditions under which responsibility for a storage site can be transferred back to the state.

3.4 PIR objectives - The Storage of Carbon Dioxide (Access to Infrastructure) Regulations 2011

Regulation	Objective
The Storage of Carbon Dioxide (Access to Infrastructure) Regulations 2011	These regulations implement Articles 21 and 22 of the **CCS Directive**. 1. **They enable third parties to access existing CO_2 pipelines and storage sites** on transparent and non-discriminatory terms, avoiding unnecessary duplication of infrastructure. 2. **Any "third party" seeking to join the network** can apply to a T&SCo who must consider the access request 3. **Promote efficient use of infrastructure** by encouraging shared use of pipelines and storage facilities; help reduce costs and environmental impact and support the effective development of CCS networks. 4. **Provide a clear dispute resolution process,** empowering the Secretary of State Scottish Ministers, or the NSTA to intervene and resolve disputes over access, ensuring that negotiations are fair and that infrastructure owners cannot unreasonably block access. 5. **There are separate, equivalent regulations for Northern Ireland.** These do not require a review.

3.5 PIR objectives - The Storage of Carbon Dioxide (Inspections) Regulations 2012

Regulation	Objective
The Storage of Carbon Dioxide (Inspections) Regulations 2012)	These regulations establish inspection procedures for CO_2 storage sites to ensure compliance with safety and environmental standards. Their main objectives are: 1. **To implement Article 15 of EU Directive 2009/31/EC,** which requires regular inspections of carbon dioxide storage complexes to ensure environmental safety and compliance 2. **They require** the NSTA to carry out **routine inspections** of each storage site **once a year** and provide powers for non-routine inspections to be carried out. Inspections are for the purposes of monitoring the effects on the environment and on human health. 3. The regulations also **amend existing licensing regulations (specifically the 2010 Licensing Regulations)** to incorporate inspection and enforcement provisions. 4. **There are separate, equivalent regulations for Scotland.** These do not require a review.

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4. PIR process

4.1 PIR process

A PIR seeks to establish whether, and to what extent, the regulations:

a) **achieved their original objectives** as set out in the original Impact Assessment (IA),
b) resulted in any **unintended effects**,
c) have **objectives** which are still **valid**,
d) are **still required and remain the best option** for achieving those objectives; and,
e) can be **improved** to reduce the **burden on business and its overall costs**.

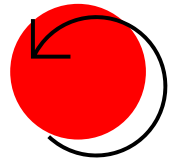
The PIR report to be produced for these regulations will answer the questions set out in their review provisions and will provide the analysis to support decisions about the next steps with the regulations.

The next steps following a PIR are:


Renewal


Amendment


Removal


Replacement

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5. Subjects and questions for industry stakeholders

5.1 Questions for industry

The overall objective of the carbon storage regulations is to establish a legal framework for the safe and environmentally sound geological storage of CO_2. We consider these objectives are met by the regulations.

We welcome views from stakeholders on any aspect of the regulations in scope of the PIR process which may have had **unintended effects** or whether they could be **improved** to reduce the **burden on business and its overall costs**.

While we welcome views on any aspect of the regulations in this regard, we have also identified a number of specific aspects where we are seeking industry views:

- Demonstration projects
- Definitions of leakage and significant risk of leakage
- Post closure transfer requirements
- Post closure monitoring requirements
- Financial security requirements
- Cost and value for money considerations
- Regulatory overlaps

5.2 Demonstration projects - background

Relevant legislation

- The Storage of Carbon Dioxide (Licensing etc) Regulations 2010
- The Storage of Carbon Dioxide (Termination of Licences) Regulations 2011

Summary of current position

- The regulations require that a carbon storage permit and associated requirements must be in place before any carbon storage injection can occur.
- There is no minimum volumetric or other threshold for the storage permit requirement.
- The EU Directive on CCS sets out that the requirements in the Directive requirement, to hold a storage permit and associated requirements, does not apply to geological storage of CO_2, with a total intended storage below 100 kilo tonnes, undertaken for research, development or testing of new products and processes. This aspect of the EU Directive was not transposed into UK law.

5.2. Demonstration projects - questions

1. How effective are current regulations in facilitating demonstration projects?

- *Please rate your answer in the range 1-4. where 4 is very effective and 1 is not effective. at all.*
- *Please provide reasoning and evidence for your answer, including evidence on the costs and benefits associated with the regulatory requirements where possible.*

2. To what extent do you agree that the requirement in the EU CCS Directive, that a storage permit and associated requirements, need not apply to projects, with an intended storage of less than 100 kilo tonnes, undertaken for research, development or testing new products or processes?

- *Please rate your answer in the range 1-4, where 4 is strongly agree and 1 is strongly disagree.*
- *Please provide reasoning and evidence for your answer, including evidence on the costs and benefits associated with the regulatory requirements where possible.*

5.3 Definitions relating to leakage - background

Relevant legislation

- The Storage of Carbon Dioxide (Licensing etc.) Regulations 2010

Summary of current position

- The Storage of Carbon Dioxide (Licensing etc.) Regulations 2010 provide that before granting a storage permit the licensing authority must be satisfied that there is no significant risk of leakage or of harm to the environment or human health. The Regulations also make provision to monitor sites and take corrective measures in response to any leakage.
- The Regulations (Regulation 1) take the definitions of “leakage’ and “significant risk” from Article 3 of the EU Directive on CCS, where:
  - “leakage” means any release of CO_2 from the storage complex; and
  - “significant risk” is defined as “a combination of a probability of occurrence of damage and a magnitude of damage that cannot be disregarded without calling into question the purpose of this Directive for the storage site concerned.
- The Regulations do not include any thresholds or quantification for what constitutes leakage or tolerance for probability of occurrence of “significant” risk of leakage.

5.3 Definitions relating to leakage - questions

3. **As defined in the Storage of Carbon Dioxide Regulations 2010, my organisation understands what is meant by "leakage" and "no significant risk of leakage"**

    - *Please rate your answer in the range 1-4, where 4 is completely agree and 1 is completely disagree. Please explain your answer.*

4. **The Storage of Carbon Dioxide Regulations do not quantify leakage, for example leakage requiring corrective measures. Does this affect your business practices?**

    - *Please include evidence on the costs and benefits associated with the regulatory requirements where possible.*

5.4 Post closure transfer requirements - background

Relevant Legislation

- The Storage of Carbon Dioxide Regulations 2010, Regulation 13 and 14.
- The Storage of Carbon Dioxide (Termination of Licences etc) Regulations 2011, Regulation 8.

Summary of current position

- The Regulations require a post-closure monitoring plan to be agreed as a condition of the grant of a storage permit.

- Sections 8(a) and 8(d) of The Storage of Carbon Dioxide (Termination of Licences etc) Regulations 2011, require that “all available evidence indicates that the stored CO_2 will be "completely and permanently contained" before the storage licence can be terminated and transfer of responsibility.

5.4 Post closure transfer requirements - questions

5. **How feasible does your organisation consider it to be to demonstrate that “all available evidence indicates that the stored CO_2 will be "completely and permanently contained” as required for terminating a storage licence after site closure?**

   - *Please rate your answer in the range 1-4, where 4 is completely feasible and 1 is not feasible at all.*

   - *Please provide reasoning and evidence for your answer, including evidence on the costs and benefits associated with regulatory requirements where possible.*

5.5 Post closure monitoring requirements

Relevant Legislation

- The Storage of Carbon Dioxide (Licensing etc.) Regulations 2010, Regulations 13 and 14
- The Storage of Carbon Dioxide (Termination of Licences etc) Regulations 2011

Summary of current position

- The Regulations require a post-closure monitoring plan to be agreed as a condition of the grant of a storage permit. This must be based on best practice, and in accordance with Annex II to the EU CCS Directive.

- The minimum post-closure monitoring period established in the Regulations is 20 years, with scope for this period to be shortened if conditions in regulation 8a of The Storage of Carbon Dioxide (Termination of Licences etc) Regulations 2011 are met.

- Post-closure monitoring obligations could account for a significant proportion of project and associated costs. These costs may vary according to frequency and type of monitoring technologies used.

5.5 Post closure monitoring requirements - questions

6. **Has the flexibility (or lack thereof), of post-closure monitoring requirements affected your organisation's business practices?**

    - *Please provide reasoning and evidence for your answer, including evidence on the costs and benefits associated with regulatory requirements where possible.*

7. **What proportion of overall project costs do you anticipate the costs associated with post-closure monitoring requirements to comprise.**

    - *0-25%%; 26-50%:51-75%: 76%-100%.*

    - *Please provide reasoning and evidence for your answer, including evidence on the costs and benefits associated with regulatory requirements where possible.*

5.6 Financial security requirements - background

Relevant Legislation

- The Storage of Carbon Dioxide (Licensing etc.) Regulations 2010, Schedule 2, Section 7.

Summary of current position

- The Storage of Carbon Dioxide (Licensing etc.) Regulations 2010 require that operators demonstrate they have adequate financial security in place before a storage permit is granted. This financial security must be in force before the commencement of injection and remain in force until the licence is terminated.
- This is to ensure that the obligations under the storage permit can be met, including obligations relating to monitoring, closure, and post-closure responsibilities.
- Under Schedule 2, section 7, of The Storage of Carbon Dioxide (Licensing etc.) Regulations 2010 the licensing authority may review the amount of financial security in place to ensure it remains appropriate taking into account the assessed risk of leakage, and the estimated costs of meeting the obligations.

5.6 Financial security requirements - questions

8. **How flexible do you consider the financial security requirements in the Storage of Carbon Dioxide (Licensing etc.) Regulations 2010 to be, for example in respect of the form security may take, or how it is to be assessed?**

   - *Please rate your answer in the range 1-4 where 4 is highly flexible and 1 is not at all flexible.*
   - *Please provide reasoning and evidence for your answer, including evidence on the costs and benefits associated with regulatory requirements where possible.*

5.7 Cost and value for money requirements – background

Summary of current position

- Current Storage of Carbon Dioxide Regulations do not include value for money or cost efficiency considerations.
- This means the licensing authority is not required to take into account economic or VfM considerations associated with compliance with the regulations e.g. associated with monitoring or financial security requirements.
- The economic regulator of CO_2 transport and storage has a statutory objective to promote the efficient and economic development and operation of transport and storage networks.

5.7 Cost and value for money requirements - questions

9. Does the absence of value for money considerations in the regulations impact your business practices?

- *Please rate your answer in the range 1-4, where 4 has a large impact and 1 has no impact at all.*
- *Please provide reasoning and evidence for your answer, including evidence on the costs and benefits associated with regulatory requirements where possible.*

5.8 Overlap of regulatory responsibilities - background

Relevant Legislation

- The Storage of Carbon Dioxide (Licensing etc.) Regulations 2010
- The Storage of Carbon Dioxide (Termination of Licences etc) Regulations 2011

Summary of current position

- In a number of areas covered by the regulations, more than one regulatory body has a role or interest. For example, the NSTA and OPRED both have responsibilities for ensuring the risks to environment are minimised, and that facilities are removed.
- We are interested in hearing about the practical experience of the storage licensing and permitting processes from the perspective of how effective the regulations are, including when read in conjunction with other regulatory requirements, at ensuring clarity on processes and respective roles and responsibilities.

5.8 Overlap of regulatory responsibilities - questions

10. **What has been your experience of the Storage of Carbon Dioxide licensing process with respect to the requirements, roles and responsibilities of the different regulatory bodies and organisations involved?**

    - *Please explain your answer.*

11. **How effective are the current regulations at minimising regulatory overlap?**

    - *Please rate your answer in the range 1-4, where 4 is very effective and 1 is not effective at all.*
    - *Please provide reasoning and evidence for your answer, including evidence on the costs and benefits associated with regulatory requirements where possible.*

5.9 General

- We also intend to ask an open question inviting stakeholders' views on **any other aspects of the regulations that they consider burdensome for businesses.**
- As part of this we would value reasoning and evidence for answers given, including **evidence on the costs and benefits associated with regulatory requirements where possible**.
- This question will be subject to a 250-word limit.
- **Please note the disclaimer as displayed on slide 2, also applies to the questionnaire.**
- There will be a published report of the PIR conclusions, however the PIR is not a policy consultation. We will give consideration to any policy-related issues that may be identified through the PIR following the report.

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6. Discussion and Questions

Thank you

Close.

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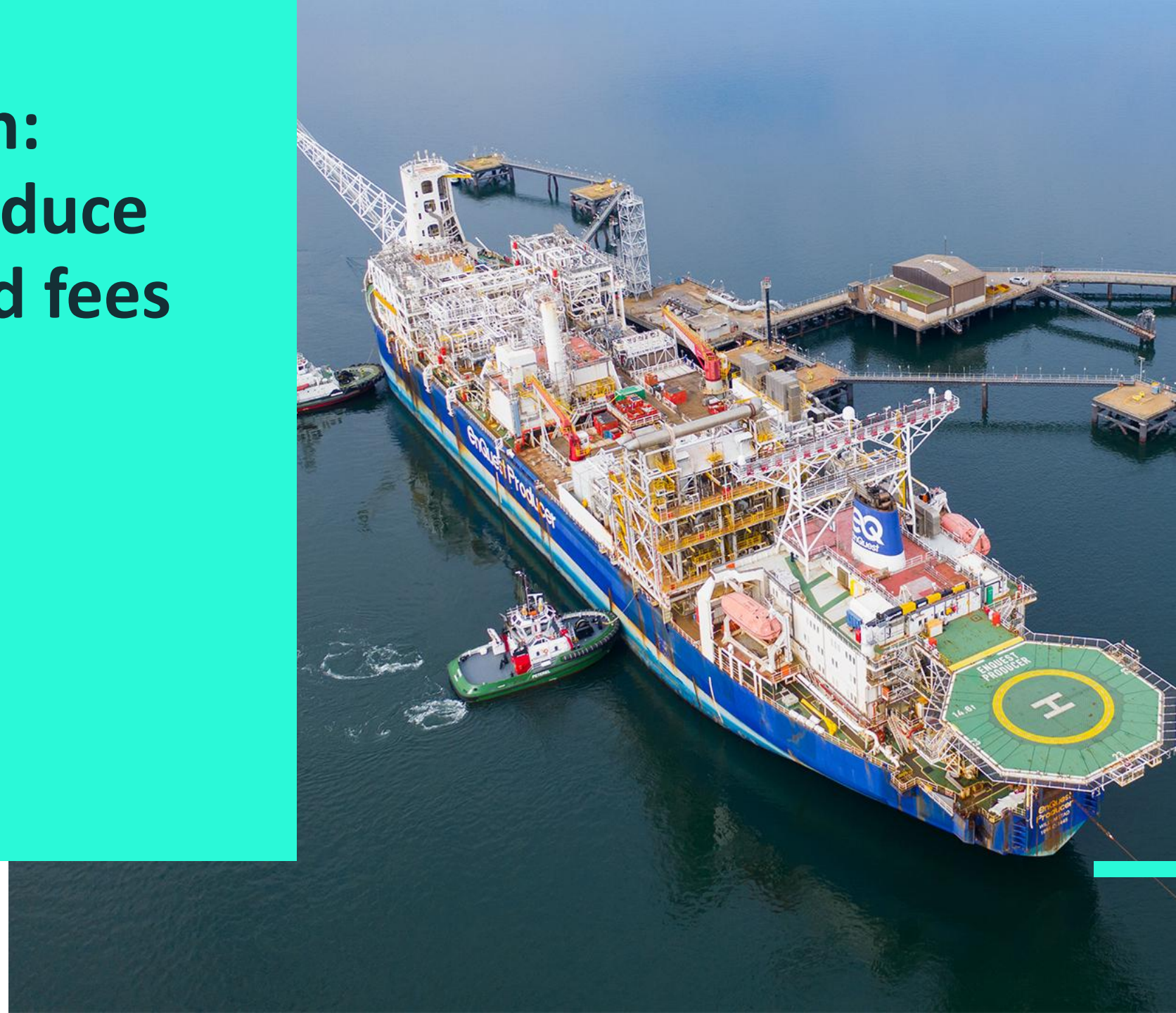
Useful links

	Regulations
1	The Storage of Carbon Dioxide (Termination of Licences) Regulations 2011
2	The Storage of Carbon Dioxide (Amendment of the Energy Act 2008 etc.) Regulations 2011
3	The Storage of Carbon Dioxide (Access to Infrastructure) Regulations 2011
4	The Storage of Carbon Dioxide (Inspections etc.) Regulations 2012
5	The Storage of Carbon Dioxide (Licensing etc) Regulations 2010) Email contacts: Viv.collins@energysecurity.gov.uk Julie.Little@energysecurity.gov.uk

NSTA Consultation: proposals to introduce new and amended fees

Group discussion



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Context: consultation overview

Context:

The (NSTA) has launched a consultation seeking views on its proposals to introduce new fees for some of its services, and amend some of the existing fees for its services to better reflect service costs, align with petroleum licensing, and ensure fairness under the “user pays” principle.

The consultation is split into two main parts, each covering different sectors of regulated activity:

- **Carbon Storage – developing a robust and fair fee regime for the growing CO_2 storage sector**
  - New fixed fees for carbon storage wells (e.g. drilling, suspension, injection)
  - Change from timesheet-based to fixed fee for work programme amendments
  - Inclusion of End Assess Phase Review in storage proposal fees
  - Introduction of interim fees and withdrawal fees for permit applications
  - New timesheet-based fee for periodic financial security assessment
- **Petroleum & Gas Storage* - refining existing frameworks to address complexity and emerging activities**

** includes hydrogen storage*

Part 1 (carbon storage): summary of proposals and questions

	Full Question	Related Proposal
Q1	Do you have any comments on the proposal that the NSTA introduces fixed fees for consents in relation to wells used for CO2 appraisal and development? Do you agree that the rates of the fees should be broadly similar to equivalent fees for consent for petroleum licences?	Introduce **fixed fees** for consents related to carbon storage wells (e.g., drilling, injection, suspension), aligned with petroleum fees.
Q2	Do you agree that the NSTA should amend the fee for processing applications for amendments to carbon storage work programmes from timesheet-based fee to a fixed fee?	Replace **timesheet-based fee** for carbon storage work programme amendments with a **fixed fee**.
Q3	Do you have any comments on the proposal that the fee for consent to a carbon dioxide storage proposal should include the costs of the NSTA's work carried out in the End Assess Phase Review?	Include **End Assess Phase Review** costs in the fee for carbon dioxide storage proposals.
Q4A	Do you have any comments on the proposal that the NSTA should introduce six-monthly interim fees for carbon storage permit applications?	Introduce **interim (six-monthly) fees** to reflect costs incurred before final permit decisions.
Q4B	Do you have any comments on the proposal that the NSTA should introduce a fee for carbon storage permit applications that are withdrawn?	Introduce a **withdrawal fee** for permit applications that are withdrawn before determination.
Q5	Do you have any comments on the proposal that the NSTA should introduce a timesheet-based fee for periodic assessment of financial security maintained by an operator of a carbon storage site?	Introduce a **timesheet-based fee** for annual reviews of **financial security** held by storage operators.

Discussion & next steps: CCSA response

(Today)

CCSA member call

- *Any initial views?*

(W/C 21 Jul)

CCSA to circulate first draft

- Request member comments and input
- Comment window ~ 2 weeks

(W/C 4 Aug)

CCSA to circulate second draft

- Request final comments ahead of submission
- Shorter comment window (~ 1 week)

(12 Aug)

Submission deadline

Final Questions & AOB

- **AOB**
- **Actions?**
- **Next Meeting Dates:** a placeholder will be circulated for the next quarterly meeting (October 2025)