
Re-use of oil and gas assets for carbon capture and storage projects

There is potential for significant cost savings for some initial CCUS projects which can re-use existing oil and gas infrastructure. The re-use of strategic assets can also help meet the government's stated ambition to deploy CCUS in the UK across this decade, putting us on a firm pathway to our net zero ambitions.

Introduction

Carbon Capture Usage and Storage (CCUS) is likely to be essential in successfully tackling climate change and meeting the ambitions of the Paris Agreement. Domestically, CCUS is likely to play an essential role in meeting our net zero target. The deployment of CCUS will also be central to supporting the low carbon transformation of the UK's industrial base and to achieve the government's mission, announced in the Industrial Strategy, to establish the world's first net zero carbon industrial cluster by 2040, and at least one low carbon cluster by 2030.

Central to our ambition to deploy CCUS at scale in the UK is the development of a network of infrastructure to transport and permanently store Carbon Dioxide (CO₂) offshore.

The government has been working closely with industry to evaluate potential business models for CO₂ transport and storage. In 2019 we launched a consultation on CCUS business models alongside the consultation on the re-use of oil and gas assets for CCUS projects. The response to the CCUS Business Models consultation is published alongside this response and can be found at <https://www.gov.uk/government/consultations/carbon-capture-usage-and-storage-ccus-business-models>.

A CCUS transport and storage network will require the development and construction of a large amount of infrastructure, including onshore and offshore pipelines, compressor stations, injection wells and subsea manifolds. This will require relatively high upfront capital expenditure, but once built, the operating costs for a transport and storage network are expected to be relatively low.

The UK currently has an extensive network of offshore infrastructure, put in place to facilitate oil and gas extraction. This includes pipelines, wells, and depleted oil and gas reservoirs, a number of which are due to be decommissioned in the coming years. These are broadly similar assets to those which would be built as part of the transport and storage infrastructure of a CCUS project. Some of these assets could potentially therefore be re-used as part of a CCUS project once they have reached the end of their commercial life for oil and gas extraction. The potential value of re-using oil and gas assets for CCUS projects has recently been highlighted by the CCUS Cost Challenge Taskforce¹, and by both the Scottish Affairs² and Public

¹ Delivering Clean Growth: CCUS Cost Challenge Taskforce report <https://www.gov.uk/government/groups/ccus-cost-challenge-taskforce#report>

² Scottish Affairs Committee: The future of the oil and gas industry: <https://publications.parliament.uk/pa/cm201719/cmselect/cmsscota/996/99602.htm>

Accounts³ Committees, who have called on the UK government to develop a policy on re-use.

There is the potential for significant cost savings for some CCUS projects which can re-use appropriate existing oil and gas infrastructure. Whilst the exact value of these cost savings is uncertain, upfront capital costs savings for some projects could be in excess of £100 million compared to the costs to construct new pipeline infrastructure⁴. The re-use of strategic assets can also lower the carbon footprint associated with the construction of infrastructure. There are also potential benefits for oil and gas owners and operators that transfer suitable assets to CCUS projects, including opportunities to maximise the economic life of their assets, and to potentially reduce or transfer decommissioning costs.

Box 1: Case Studies

There are several CCUS projects being developed in the UK and internationally that are proposing to re-use a range of different types of infrastructure previously used for oil and gas operations:

Project Acorn⁵ is a CCUS project in North East Scotland, planning to initially capture CO₂ emissions at the St Fergus Gas Terminal from the early 2020's. The proposals include the re-use of trunk pipelines to transport CO₂ from industrial sources to offshore storage sites, followed by the deployment of low carbon hydrogen production.

HyNet⁶ is a CCUS project in North West England, planning to capture CO₂ from industrial sources in the early-to-mid 2020's (phase 1), followed by the production of hydrogen from natural gas (phase 2). The proposals include re-using a range of existing oil and gas infrastructure, including a trunk pipeline that connects the Point of Ayr terminal to a depleted oil and gas field in the Liverpool Bay.

Internationally, the **Porthos Project**⁷ in the Netherlands is considering the re-use of existing oil and gas assets as part of their proposals to transport and store CO₂ that has been captured from several companies based in the Rotterdam port area.

Background to the consultation

In the 'CCUS Deployment Pathway: An Action Plan'⁸ we committed to complete a process to identify existing oil and gas infrastructure that could be re-used to support the development of CCUS projects, and to develop a policy on this.

The aim of the consultation is to help facilitate the deployment of CCUS at scale by identifying the existing opportunities and barriers to the re-use of infrastructure for CO₂ transport and storage.

³ Public Accounts Committee: Public cost of decommissioning oil and gas infrastructure: <https://www.parliament.uk/business/committees/committees-a-z/commons-select/public-accounts-committee/inquiries/parliament-2017/inquiry114/>

⁴ Acorn Project Infrastructure Reuse and Decommissioning: https://actacorn.eu/sites/default/files/Infrastructure_Poster2.pdf

⁵ Acorn Project <https://actacorn.eu/>

⁶ HyNet <https://hynet.co.uk/>

⁷ PORTHOS Project <https://www.rotterdamccus.nl/en/>

⁸ [The UK carbon capture, usage and storage \(CCUS\) deployment pathway: an action plan \(November 2018\)](#)

Nothing in these policy proposals is intended to diminish the decommissioning obligations which may be imposed upon the owners or operators of carbon storage installations, sub-surface pipelines, or other infrastructure installed or maintained for the purposes of CO₂ storage activities (including in connection with section 30 of the Energy Act 2008).

What we asked

The consultation included 13 questions, under 3 main headings:

- Identification of the oil and gas infrastructure with re-use potential for CCUS projects
- Policy to help facilitate the re-use of oil and gas assets for CCUS projects
- Policy on the preservation of assets

This document is a summary of the evidence submitted and the actions and next steps the government and its partner organisations will take under each of the 3 headings.

Several respondents submitted evidence, letters, and emails that did not respond directly to the 13 questions asked in the consultation document. These submissions have been considered as part of this consultation exercise and used in the development of our response.

Overview of the responses

We received 35 responses to the consultation, submitted online or via email. Respondents are broadly characterised into the groups listed in the table below.

Table 1: Breakdown of the responses received

Total number of responses received	35
Oil and gas and industrial sectors	12
Trade bodies and industry associations	6
Academia (including individuals) and professional bodies	8
Consultancy groups	7
UK devolved administrations	2

This document does not contain a list of the respondents or contain any personal or organisational details. Respondents' views are summarised in the following sections of this report but are not attributed to any individual respondent or specific organisation. The figures in this document relate to those who responded to the consultation and should not be treated as statistically representative of the groups listed above at large. The government does not plan to publish any individual consultation responses it received; however, organisations may wish to publish their own responses independently.

Devolved Administrations

We are committed to working with the relevant devolved administrations to ensure that the proposed policies take account of devolved responsibilities and policies across the UK. We will continue to engage with those administrations further as we develop our policy proposals.

During the consultation period and in the formulation of this response we took steps to engage with the devolved administrations. The Scottish and Welsh Governments have provided views on the issues and questions raised in the consultation via letters to BEIS Ministers and during discussions with officials. We welcome and thank both Governments for these views.

Stakeholder engagement

In developing this response, we have carefully considered the evidence submitted to the consultation and have continued our close engagement with stakeholders in the oil and gas and CCUS sectors.

We have also continued to work in close partnership with the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED), Oil and Gas Authority (OGA), the Crown Estate, the Crown Estate Scotland, the Health and Safety Executive (HSE), and the Marine Maritime Organisation, who have been vital to the development of this work.

Identification of oil and gas infrastructure with re-use potential

The UK has a substantial network of offshore oil and gas infrastructure in the North and Irish Seas, including over 300 platforms and 1,000 pipelines. An increasing amount of this infrastructure is being decommissioned as assets reach the end of their operational life for hydrocarbon production. The OGA estimate⁹ that the total cost of decommissioning these assets between 2019-20 and 2064-65 is £51 billion (2018 prices). The projected Exchequer cost of tax relief from this expenditure is £16.8 billion. This is made up of £8.3 billion from tax repayments and a reduction in the Offshore Corporation Tax of £8.5 billion. Decommissioning expenditure reduces company profits and hence lowers the overall tax take.¹⁰

To provide clarity to the oil and gas and CCUS sectors we consulted on a provisional list of the types of infrastructure we identified as having the most re-use potential, the criteria to decide whether infrastructure is suitable for re-use, and a provisional list of trunk pipelines and CO₂ stores with re-use potential.

Type of infrastructure

We consulted on a list of types of infrastructure, identified through our stakeholder engagement as having the most re-use potential, depending on the individual project. These were:

- Depleted oil and gas reservoirs

⁹ The OGA 2019 UKCS Decommissioning Cost Estimate Report <https://www.ogauthority.co.uk/news-publications/publications/2019/ukcs-decommissioning-cost-estimate-2019-report/>

¹⁰ Statistics of Government revenues from UK Oil and Gas production https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818296/Statistics_of_government_revenues_from_UK_oil_and_gas_production_July_2019.pdf

- Wells
- Trunk pipelines
- Platforms
- Other infrastructure

Have we identified the correct types of oil and gas infrastructure that are likely to be important for re-use in CCUS projects? (Question 1)

Of the 35 responses received, 25 responded directly to this question.

The majority of respondents agreed with the types of infrastructure identified, including our assessment that trunk pipelines and depleted oil and gas reservoirs are likely to have the most re-use potential. However, there was a consensus that the infrastructure listed should be considered as 'high-level' and not exhaustive.

It is possible that for certain projects there will be other types infrastructure with re-use potential. In these cases, there may be a need to adopt a case-by-case approach to evaluate the individual assets being proposed.

Depleted oil and gas reservoirs are likely to have been appraised and monitored extensively as part of previous oil and gas operations, meaning that the subsurface geology is well-characterised. Respondents agreed that this could be of benefit for certain CCUS projects by allowing for accurate modelling of CO₂ injection and storage performance. These potential benefits may need to be balanced against the number and condition of existing wells drilled into the store, which could be at risk of corrosion, particularly if they have not been plugged and abandoned in a way in which is suitable for the presence of CO₂.

Several respondents questioned the exclusion of saline aquifers from the infrastructure list. Saline aquifers are geological formations consisting of water-permeable rocks that are saturated with brine and, alongside depleted oil and gas reservoirs, are likely to be key resources for the geological storage of CO₂. As they have not been involved in oil and gas extraction activities, saline aquifers are not considered to be re-used or re-purposed. However, for completeness we included saline aquifers within the list of sites we have identified as having the most CO₂ storage potential in the annex published alongside the consultation document.

Wells include exploration, appraisal, and production wells drilled into the reservoir as part of the hydrocarbon extraction process, which could be re-used to inject CO₂. The potential to re-use a depleted oil and gas reservoir may be largely dependent on the integrity of wells present.

In the consultation we said that the re-use of wells is likely to be less common as they would need to be situated in the correct location and meet the required safety standards, including being capable of withstanding re-introduced pressure into the reservoir during CO₂ injection and corrosion from their contact with CO₂-bearing fluids.

Depleted oil and gas reservoirs may also contain historic wells that have not been decommissioned in a way that is suitable for re-use for CO₂ injection. In these instances, there may also be a lack of data and technical records on the condition of the well and the way in which it was plugged and abandoned. Respondents suggested that where this information exists it should be made available to CCUS projects, alongside sub-surface data.

Respondents largely agreed that in many cases the re-use of wells will not be possible without significant re-design and re-completion, leading to an increase in the cost of developing a CO₂ store.

Trunk pipelines are large pipelines that transport oil and gas from offshore facilities to the mainland. Trunk pipelines can often be hundreds of kilometres long and typically have a large diameter, capable of transporting large volumes of gas or fluid. In the consultation we said that, depending on their condition, there may be significant time and cost savings for projects able to re-use trunk pipelines. Several respondents highlighted that many of the trunk pipelines in the annex published alongside the consultation continue to be used for oil and gas extraction activities, and in some cases are not due to be decommissioned within the timescales set out in our CCUS Deployment Pathway¹¹.

One respondent suggested that where certain trunk pipelines may not be available within the required timeframe the re-use of inter-field pipelines should be considered, which could connect individual storage sites to trunk pipelines via adjacent fields or through a development hub. Inter-field pipelines are likely to become available for re-use at an earlier stage than trunk pipelines following the decommissioning of a field; however, they typically have a shorter design life, which may increase costs for a CCUS project.

Platforms are used to produce, process, and sometimes store oil and gas. In the consultation document we said that there may be potential for some CCUS projects to re-use platforms, but that this was likely to only be the case in some very specific circumstances.

The condition of platforms typically deteriorates quickly after oil and gas operations have ended and, of the 25 respondents to this question, only 4 recommended their re-use potential.

One respondent suggested that options to modify existing platforms for CCUS should be considered. They noted that a distinction should be made between the platform and jacket structures because it may be possible to remove the topside and retain the jacket structure, retrofitting a smaller, fit-for-purpose module.

Other infrastructure associated with oil and gas activities, such as that suggested in the consultation document, may have some re-use value for certain CCUS projects. In the consultation we said that we did not view there to be a strong case for government intervention to preserve these assets, either because they are likely to have low re-use value or because they could be transferred as part of a commercial transaction.

Respondents also suggested additional infrastructure not listed in the consultation document. These are shown in Figure 1, against the frequency raised. Whilst the focus of the consultation was on physical offshore infrastructure, 15 respondents suggested that the re-use potential of onshore infrastructure should be also evaluated, including gas terminals and processing, onshore pipelines and storage, shipping facilities, compressors, and injectors.

¹¹ [The UK carbon capture, usage and storage \(CCUS\) deployment pathway: an action plan \(November 2018\)](#)

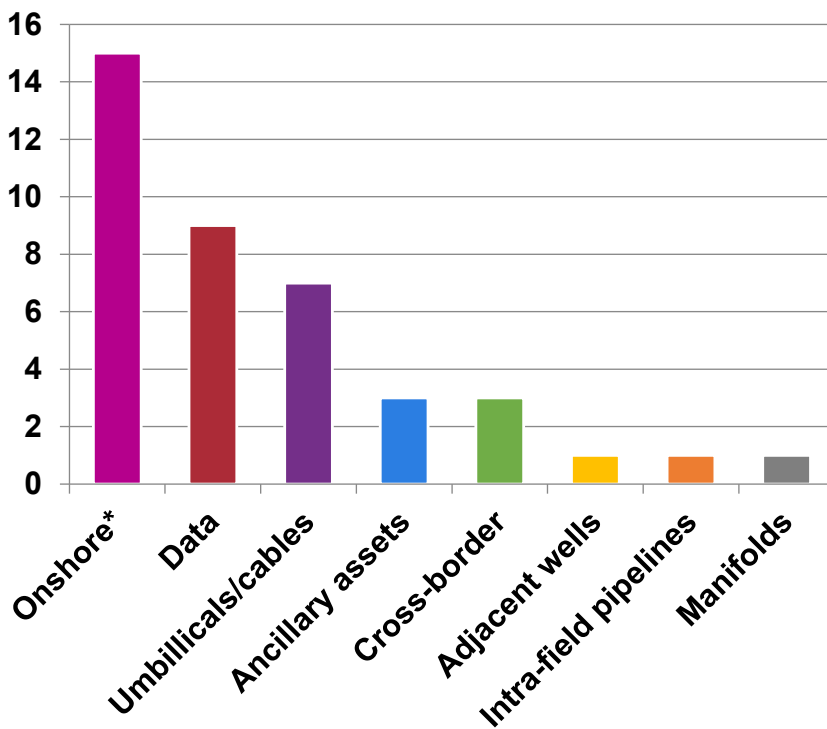


Figure 1: Bar chart showing other infrastructure suggested by respondents (excluding depleted oil and gas reservoirs, wells, and trunk pipelines). * Onshore infrastructure includes gas terminals, shipping facilities, compressors, onshore storage, onshore pipelines, and injectors.

- *Gas terminals and onshore processing facilities* are typically located at the landfall of existing oil and gas pipelines and often house much of the equipment required to operate the pipeline, for example corrosion inhibitor injectors and PIG launching facilities. Their proximity to both emissions hubs and offshore storage locations, and their high capacity connections to the national gas transmission system, may be an enabler for both CCUS projects and low carbon hydrogen production. Respondents generally viewed there to be limited opportunity to re-use much of the existing physical infrastructure at the facilities, but that both the existing footprint of the site, including the supporting infrastructure and utilities, and an existing skilled workforce to operate equipment, could significantly reduce the upfront investment costs required to develop a CO₂ transport and storage network.
- *Onshore pipelines*, part of the existing national transmission system, were suggested as having the potential for re-use, as well as to reduce the time, cost and environmental issues associated with the construction of new pipelines.
- *Shipping and port facilities* suggested included onshore facilities to combine and process CO₂ streams from different sources, temporary storage facilities, and port facilities for CO₂ loading and unloading.
- *Onshore storage*, including salt caverns were suggested as a potential low cost, short-term alternative to offshore storage.

Box 3 - British Geological Survey CO₂Stored database

CO₂Stored, the UK's CO₂ Storage Evaluation Database, is the global leader in the provision of high-quality detailed data of a nation's geological storage resource.

The CO₂Stored database contains detailed information on more than 570 prospective storage units underlying the seabed around the UK.

The data was acquired by industry and research partners supported by the Energy Technologies Institute and BEIS. Input data were assessed, abstracted, and compiled, and complex calculated values derived for potential storage capacity in geological formations and hydrocarbon fields.

The database has been further developed through improvements to data and functionality. Data is freely available via the [CO₂Stored website](#) to registered users.

Of the additional infrastructure proposed by respondents, onshore gas terminals were the most frequently mentioned. We agree with the views expressed that these facilities would have an important role in monitoring and operating CO₂ pipelines.

Action 4: Based on the feedback received, the OGA have conducted an initial assessment of existing UK onshore gas terminals to determine their location and connections to the trunk pipelines identified as having the greatest re-use potential. We will undertake further work with the OGA to determine the capacity, anticipated end of life, and feasibility for re-using infrastructure at these sites.

The re-use of cross-border infrastructure may become more important with increased CCUS deployment. However, we do not view the detailed assessment of the potential to re-use cross-border infrastructure to be a priority at this early stage.

Criteria to assess the re-use potential of infrastructure:

The majority of respondents were in broad agreement with the criteria we identified as being important in deciding whether individual oil and gas assets are suitable for re-use in CCUS projects.

This list of criteria is by no means exhaustive and the appraisal of assets will involve in-depth assessments on a case-by-case basis. Based on our stakeholder engagement and further analysis of the evidence we received, we agree with the views expressed that well integrity and asset availability are two factors which should be included under our list of criteria.

We recognise that information on the availability of an asset will be a crucial consideration in determining whether it can be re-used for CCUS. This will need to include an indication of anticipated cessation of production, as well as the potential for the asset to be used at a later date for further hydrocarbon extraction activities, in line with the UK Maximum Economic Recovery Strategy. This assessment will also highlight where there are more immediate decisions to be made by industry regarding the decommissioning or suspension of assets with re-use potential.

Action 5: We are working closely with the OGA to make an assessment of availability and future cessation of production plans for the pipelines and storage sites we have identified as having the most re-use potential.

We currently hold the view that publishing an indication of the approximate cessation of production date for assets over 5-year intervals would be appropriate and proportionate.

However, recognising that there are potential commercial sensitivities around publishing this information we intend to consult with industry on this proposal over the coming months.

We received a large amount of highly technical information in response to this question, which warrants further consideration. The government is working in partnership with industry, through CCUS Expert Groups, to consider a range of commercial, technical and delivery aspects applicable to future business models and these topics will be considered in more detail as part of this process.

Specific assets with re-use potential:

Alongside the consultation document we published an annex including the pipelines and stores identified as having the greatest re-use potential. This was intended to aid discussions around the potential to re-use an asset as it approaches the end of its economic life for oil and gas purposes. The consultation document also contained a table listing assets that we had identified as likely to have the greatest re-use potential and a figure illustrating the locations of stores and pipelines.

Through our review, we have concluded that these tools are not dynamic enough to depict the range of different UK Continental Shelf interfaces and technologies.

As part of Phase 2 of the Energy Integration Project (see Box 3), and following publication of the report¹² in August, the OGA have mapped infrastructure with re-use potential, which will be integrated with other offshore data in an interactive digital map to be published later this year. This will allow interested stakeholders to visualise the location and interaction of key assets, which may be of strategic value for CCUS projects. We believe this is a more appropriate and dynamic means of holding this information.

Action 6: Information on the oil and gas assets we have identified as having re-use potential will be integrated into an interactive digital map hosted by the OGA. This will include stores and trunk pipelines (originally included in the annex published alongside the consultation document), in addition to the spur lines and onshore gas terminals, which we have included based on the feedback we received through this consultation exercise. This will be published later this year, subject to legal checks. The OGA will also be publishing an app combining data from the OGA, The Crown Estate, and The Crown Estate Scotland to provide information on UK Continental Shelf leasing and licensing for CCUS projects and offshore wind activities.

Following our review and planned consultation on the availability of oil and gas assets, and with the consent of industry, we are recommending that a future iteration of the digital map also includes cessation of production information for the pipelines, stores, and onshore gas terminals we have identified as having re-use potential.

Box 4 – UK Continental Shelf Energy Integration Project

¹² <https://www.ogauthority.co.uk/news-publications/publications/2020/ukcs-energy-integration-final-report/>

The UK Continental Shelf Energy Integration Project has been led by the OGA, working with BEIS, The Crown Estate, Ofgem and other stakeholders to test for potential technical and regulatory opportunities in the short-term, while also looking at longer-term opportunities to maximise the value of the UK Continental Shelf through energy integration. This can also enhance the value of the existing infrastructure; skills, technology and supply chains.

The project has been funded by a £900,000 grant from the Better Regulation Executive's Regulators' Pioneer Fund.

It is important to note that inclusion of an asset in this tool is provisional and subject to change. Each asset identified would need further, more detailed appraisal, to confirm its re-use potential and suitability. There is also potential for other assets, which may fall outside the parameters applied, to have re-use potential.

The inclusion of any asset in the interactive map does not confer any legal status, including in relation to the potential availability of Change of Use Relief under the proposed policy (see pg. 18) or that an application for suspension will be approved.

We welcome further engagement with external stakeholders as we develop and refine the assets identified. Any proposal to remove an asset from the infrastructure map will require independent verification by BEIS of the supporting evidence provided, in consultation with OGA, BGS, and industry.

Action 7: We will continue to work with both industry stakeholders and the relevant regulators to ensure that oil and gas assets with re-use potential continue to be identified.

Facilitating the re-use of oil and gas assets for CCUS projects

The summer 2019 consultation proposed to expand on an existing discretionary power for the Secretary of State to remove the decommissioning liability from previous oil and gas owners if assets are transferred to a CCUS project. As set out in the consultation document published last year, we emphasised that this proposed power would be discretionary and, if exercised, prior consideration would be given by both BEIS and HMT to any contingent liabilities that might arise for the government, including the extent to which the transferee can demonstrate that it has adequate resources to give effect to a decommissioning programme as and when it is required to do so, and to ensure that there would be no disruption to the wider oil and gas decommissioning regime.

In the consultation document we set out some of the potential challenges to overcome in re-using assets for CCUS projects. These were:

- Some oil and gas assets that have re-use potential are likely to be decommissioned in the coming years before CCUS projects may be willing and able to take ownership of them.
- Whilst it might be possible to defer decommissioning of offshore oil and gas assets to a date that would increase the likelihood of an asset being transferred to a CCUS project, this would result in essential ongoing monitoring and maintenance costs being incurred by the asset owner.

- The decommissioning regime which applies in respect of offshore oil and gas infrastructure means that in the event that the current owner is not capable of meeting their decommissioning obligations, the Secretary of State can call upon previous owners and operators to decommission the infrastructure.

Our stakeholder engagement highlighted that the perceived uncertainties regarding the potential differences in decommissioning some types of CO₂ transport and storage infrastructure (both in terms of the technical requirements and cost), compared to the oil and gas regime, may also act as a disincentive to transfer assets. The UK's international obligations on decommissioning are principally governed by the Convention for the Protection of the Marine Environment of the North East Atlantic (OSPAR Convention) Decision 98/3, which requires all fixed installations to be completely removed unless a derogation is granted.¹³

Are there any additional substantial barriers to the effective transfer of assets? If yes, please provide evidence for your answer. (Question 4)

Of the 35 responses received, 20 responded directly to this question.

Respondents perceived there to be a lack of clarity regarding the legal, fiscal and regulatory framework within which a transfer of assets would take place. As a result, there is perceived to be a lack of existing incentives to transfer assets relative to decommissioning, and in particular a lack of clarity regarding abandonment liabilities.

Other additional barriers raised by respondents included:

- Complex asset ownership arrangements, where one or more joint venture partners do not currently have an interest in participating in a CCUS project.
- Uncertainty over the implications for decommissioning tax relief of the re-use of oil and gas assets for CCUS.
- Ongoing maintenance and monitoring costs.
- Uncertainty over future decommissioning costs. Assets reaching the end of their economic life are typically decommissioned as part of a package in order to reduce costs. Removing an individual asset from a scheduled decommissioning programme, in order to preserve and suspend it, might result in increased decommissioning costs for assets not later re-used.
- Concerns about the potential reputational damage for previous owners in the event of a liability materialising following CO₂ injection.
- Data availability, quality, and transfer issues.
- Lack of clarity regarding potential license overlaps between CO₂ storage and other co-located subsurface activities.
- Uncertainty on the technical feasibility of re-using specific infrastructure for CO₂ transport and storage.

¹³ [Offshore Oil and Gas Decommissioning Guidance Notes November 2018](#)

- Potential conflicts with the OGA UK Maximum Economic Recovery Strategy.

Are changes to the current policy and legislative regimes needed to help facilitate the re-use of oil and gas assets for use as part of a CCUS project? (Question 5)

Of the 35 responses received, 20 responded directly to this question.

The majority of respondents believed that changes to the current policy and legislative regimes are needed to incentivise the transfer of oil and gas assets to CCUS projects. The justifications provided largely reflected the barriers outlined under question 5 and many respondents combined their answers for both questions.

It was suggested that an independently mandated body could coordinate and manage the transfer of assets, including the appraisal of infrastructure identified as having re-use potential, a minimum of two to three years before estimated cessation of production to coordinate the transfer of valuable data and information.

Several respondents suggested that clarity is needed over the status of these assets under Transferable Tax History.

Do you agree that the proposed policy is an effective and proportionate measure? (Question 6)

Of the 35 responses received, 20 responded directly to this question.

Responses were generally supportive of the proposed policy and felt that it would encourage asset transfer and provide clarity on liabilities. However, a small number of respondents said that the scope of the proposed policy was inadequate and should be expanded to include all infrastructure with re-use potential.

Several respondents representing the oil and gas sector highlighted the need for clarity on the status and eligibility requirements of Change of Use Relief (including that this is entrenched and protected once agreed), with the view that this would need to be confirmed with all parties before any asset transfer could take place.

It was also suggested that the government consider how dispute resolution will differ in the CCUS regime, where there may be a greater number of stakeholders involved in asset ownership and operations.

Timing of the Trigger Event

We consulted on options for an earlier designation of the trigger event, whilst emphasising that our primary consideration will be ensuring that there is not and can never be a point where neither the former oil and gas owners/operators or the incoming CCUS operator are liable to decommission the asset.

What event should be used as the point at which the Secretary of State could make a decision on removal of decommissioning obligations to previous duty holders? (Question 7)

Of the 35 responses received, 17 responded directly to this question.

