Fuels Industry UK Response to the consultation on: Regulatory proposals for Carbon Capture Utilisation and Storage and Offshore hydrogen production

Question 1: Who are you responding as?	Status	Please select only ONE response
Which of the following best describes your role? (please select only ONE response)	Consultant	
	Contractor	
	Employee	
	Employer	
	Health and Safety professional	
	Member of the public	
	Non-governmental Organisation (NGO)	
	Safety Representative	
If you select Other please provide details	Self employed	
	Trade Union representative	
	Other (please specify)	Trade Association
	Fuels Industry UK - 1 Castle Lane, Victoria, London, SW1E 6DR	

Question 2: Size of Business [routed to 'Employers' and 'Contractors' only]	**Number of people**	**Please select only ONE response**
Excluding yourself, how many people does your business employ (this includes contractors)? (please select only ONE response)	0	
	1 to 4	
	5 to 9	
	10 to 19	
	20 to 49	
	50 to 99	

	100 to 249	
	250+	Fuel production and marketing sector
	Unsure / don't know	

Question 3. Location of Business [routed to 'Employers' and 'Contractors' only]	**Location**	**Please select only ONE response**
Where is your business located? If your business has more than one site in the UK, please answer for the site where you are based. (please select only ONE response)	East Midlands	
	East of England	
	Greater London	
	North East	
	North West	
	Northern Ireland	
	Scotland	
	South East	
	South West	
	Wales	
	West Midlands	
	Yorkshire and the Humber	
	I am not based in a specific location	UK wide
	Not applicable	

Question 4: Approximate annual turnover [routed to 'Employers' and 'Contractors' only]	**Approximate annual turnover**	**Please select only ONE response**
What is the approximate annual turnover of your business? (please select only ONE response)	0 to £49,000	
	£50,000 to £99,000	
	£100,000 to £249,000	
	£250,000 to £499,000	

	£500,000 to £999,000	
	£1 million to £1,999 million	
	£2 million to £4,999 million	
	£5 million to £9,999 million	
	£10 million to £49,999 million	
	£50 million plus	
	Don't know / unsure	Not sure

Question 1: To what extent do you think that CO_2 should be classified as a dangerous fluid?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
Strongly agree				

Please provide a reason for your response

CO_2 should be classified as a dangerous fluid because it has hazardous properties such as displacement of Oxygen and asphyxiation. It must also be stored at extremely low temperatures.

Question 2: To what extent do you think that all phases of CO_2 should be classified in the same way?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
	Agree			

Please provide a reason for your response

The hazards and risks are the same when stored in bulk.

Question 3: To what extent do you think that operators of CO_2 pipelines should have to fit ESDVs to all risers of major accident hazard pipelines of 40mm or more in diameter at offshore installations?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
Strongly Agree				

Please provide a reason for your response

Emergency Shut Down Valves are critical for safe pipeline operations and will be essential for pipelines in densely populated areas.

Question 4: To what extent do you think that operators of CO_2 pipelines should have to submit a notification to HSE prior to construction?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
	Agree			

Please provide a reason for your response

Early engagement is essential to minimise the potential for any delays to development.

Question 5: To what extent do you think that operators of CO_2 pipelines should have to submit a notification to HSE prior to use?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
		Do not agree or disagree		

Please provide a reason for your response

Operational timescales should correspond with the timescales set out in planning, environmental permitting and control of major accident and hazard regulations.

Question 6: To what extent do you think that operators of CO_2 pipelines should have to submit a notification to HSE in specified other circumstances, laid out in Schedule 5 of PSR96?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
	Agree			

Please provide a reason for your response

Fuels Industry UK agrees that operators of CO_2 pipelines should have to submit a notification to HSE as specified in Schedule 5 of PSR96.

Question 7: To what extent do you think that operators of CO_2 pipelines should have to produce and maintain a Major Accident Prevention Document?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
	Agree			

Please provide a reason for your response

Pipelines Safety Regulations require a document demonstrating hazard identification, risk evaluation, and a suitable safety management system for major accident hazard pipelines. However, Fuels Industry UK believes that a Major Accident Prevention Document (MAPD) is a crucial document outlining an organisation's strategy for preventing major accidents, particularly those involving dangerous substances like CO_2 in pipelines and storage vessels.
The MAPD should detail the company's commitment to safety, the management structure for hazard control, and specific measures to minimize risks. The MAPD is a key requirement under regulations like the Control of Major Accident Hazards (COMAH), and it's a foundational document for a robust Safety Management System (SMS).

Question 8: To what extent do you think that operators of CO_2 pipelines should have to put appropriate emergency arrangements in place?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
Strongly agree				

Please provide a reason for your response

Fuels Industry UK believes that operators of CO_2 pipelines should be responsible for establishing comprehensive emergency arrangements, including robust communication plans, setting emergency planning zones, and providing training for first responders.

CO_2 pipelines present unique hazards due to the properties of CO_2, including its asphyxiant nature and the potential for rapid release and vapor dispersion. Therefore, an effective emergency response is crucial to minimize the impact of potential incidents and protect public safety.

Question 9: To what extent do you think that the Local Authority/ Authorities where a CO_2 pipeline is located should have to produce an emergency plan?				
1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
Strongly Agree				
Please provide a reason for your response Local authorities have a crucial role in emergency planning for CO_2 pipelines, though specific arrangements are often handled by pipeline operators and national agencies. However, local authorities are responsible for coordinating with these entities, informing the public, and managing local impacts during an incident. They also must play a role in longer-term planning and prevention and a clearly set out plan on how this will be achieved is essential to ensure accountability in any event. For instance, a local authority should collaborate with pipeline operators, emergency services (like fire and rescue), and other relevant agencies (e.g., the Health and Safety Executive) to develop and implement emergency response plans. Local authorities are responsible for informing the public about potential risks associated with CO_2pipelines, including what to do in case of an incident. They must also be ready to help manage the local impacts of an incident, such as traffic diversions, evacuation procedures, and support for affected residents.				

Question 10: Do you have any further comments you would like to make regarding the regulation of CO_2 pipelines?
Fuels Industry UK does not have any further comments to make regarding the regulation of CO_2 pipelines.

Question 11: The upfront cost of installing an ESDV has been estimated to be approximately £310,000. Is this estimate about right?					
1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know
If you answered 1,2,4 or 5: Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?					

Fuels Industry UK does not have sight of the detailed assumptions behind the estimate for the compliance costs of £310,000 to retrofitting an existing pipeline that would be converted to CO_2. However, based on experience in the oil and gas industry this cost may be conservative, depending on the exact requirements as they become established.

Question 12: The ongoing cost of maintaining and testing an ESDV is estimated to be approximately £11,000 annually. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have sight of the detailed assumptions behind the estimate for the compliance costs of £11,000 annually to maintain and test emergency shut-down valves on an existing CO_2 pipeline. This is because these costs are likely to be different dependent on company and complexity of the project. However based on oil industry experience, the cost is likely to be conservative particularly in the early years of CO2 pipeline development as experience matures.

Question 13: The cost of producing and sending a notification before construction has been estimated to be approximately £10,000 per notification. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have an accurate view of the assumptions behind the estimate for producing and sending a notification before construction as these costs are likely to be different dependent on company and complexity of the project.

Question 14: The cost of producing and sending a notification before use has been estimated to be approximately £7,000 per notification. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have an accurate view of the assumptions behind the estimate for producing and sending a notification before use as these costs are likely to be different dependent on company and complexity of the project.

Question 15: The cost of producing and sending a notification in other cases has been estimated to be approximately £4,000 per notification. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have an accurate view of the assumptions behind the estimate for producing and sending a notification in other cases as these costs are likely to be different dependent on company and complexity of the project.

Question 16: The upfront cost of preparing a Major Accident Prevention Document (MAPD) has been estimated to be approximately £28,000. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have an accurate view of the financial assumptions behind the cost estimate for preparing a Major Accident Prevention Document (MAPD) as these costs are likely to be different dependent on company and complexity of the project.

Question 17: The ongoing cost of maintaining and updating the MAPD is estimated to be approximately £4,300 annually. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have an accurate view of the financial assumptions behind the cost estimate for maintaining and updating a Major Accident Prevention Document (MAPD) as these costs are likely to be different dependent on company and complexity of the project.

Question 18: The upfront cost of preparing emergency procedures has been estimated to be approximately £43,000 per pipeline. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have an accurate view of the financial assumptions behind the upfront cost estimate for preparing emergency procedures as these costs are likely to be different dependent on company and complexity of the project.

Question 19: The ongoing cost of maintaining and updating the emergency procedures has been estimated to be approximately £17,000 per pipeline annually. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have an accurate view of the financial assumptions behind the ongoing cost estimate for maintaining and updating emergency procedures as these costs are likely to be different dependent on company and complexity of the project.

Question 20: The upfront cost to the operator of liaising with the Local Authority (LA) to create their emergency procedures has been estimated to be approximately £7,900 per pipeline. (This is not including costs recovered by the LA from the operator). Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have an accurate view of the financial assumptions behind the cost estimate for the operator to liaise with the Local Authority (LA) to create their emergency procedures as these costs are likely to be different dependent on company and complexity of the project.

Question 21: The ongoing cost to the operator of assisting with the LA maintaining and updating their emergency plans has been estimated to be approximately £6,400 per pipeline annually. (This is not including costs recovered by the LA from the operator), Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know
					Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have an accurate view of the financial assumptions behind the ongoing cost estimate for the operator assisting the Local Authority to maintain and update their emergency procedures as these costs are likely to be different dependent on company and complexity of the project.

Question 22: Please provide brief description(s) and estimate(s) of any other costs associated with complying with part 3 of PSR96

Fuels Industry UK does not have a response to this question.

Question 23: – Do you think that the AOGBO should be extended to include CO_2 captured through CCUS operation in all chemical phases?				
1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
	Agree			
Please provide a reason for your response Fuels Industry UK believes that the Application Outside Great Britain Order should be extended to include CO_2 captured through CCUS operation in all chemical phases. This is because it would be sensible to extend the requirements to all chemical phases of CO_2.				

Question 24: Do you think that the AOGBO should be extended to include all CCUS activities offshore?				
1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
	Agree			
Please provide a reason for your response Fuels Industry UK is of the opinion that the AOGBO should be extended to include all CCUS activities offshore. However, the decision of whether to extend the AOGBO to all offshore CCUS activities requires careful consideration of the potential benefits and drawbacks. A targeted approach, focusing on specific activities with higher risks, while also leveraging existing regulations, might be the most effective way to ensure safety and promote the development of the CCUS sector. Further consultation with stakeholders, including industry, regulators, and environmental organizations, is crucial to developing a balanced and effective policy.				

Question 25: – Do you think that the AOGBO should be extended to include all offshore hydrogen production activities?				
1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
	Agree			
Please provide a reason for your response				

Fuels Industry UK agrees with the proposal to extend the AOGBO to include all offshore hydrogen production activities. This is because FIUK supports all attempts to increase safety and reduce risk. However, it is important to have a regulatory approach that can adapt to the evolving nature of hydrogen technology and infrastructure development.

Question 26: Do you think that the requirements of MAR95 should apply to offshore CCUS activities involving CO_2 in all chemical phases, including activities that do not involve an installation?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
	Agree			

Please provide a reason for your response

The Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995 (MAR95) primarily focus on the safety of offshore installations and pipelines. While amended to include offshore CO2 storage, the wording potentially limits its application to gaseous CO2. Fuels Industry UK believes that MAR95 should apply to offshore CCUS activities involving CO2 in all chemical phases, including activities that do not involve an installation.

Question 27: - Do you think that the requirements of MAR95 should apply to all offshore hydrogen production activities?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
	Agree			

Please provide a reason for your response

Fuels Industry UK agrees that the requirements of MAR95 should apply to all offshore hydrogen production activities. However, its application to hydrogen activities is extremely complex. Some aspects of MAR95, particularly those related to safety and major accident hazards are relevant and could be adapted but wholesale application might not be appropriate. Therefore, a tailored approach, potentially incorporating elements of MAR95 alongside new regulations specific to hydrogen, is likely to provide a more suitable solution.

Question 28: Do you think that the requirements of SCR15 should apply to offshore CCUS activities involving CO_2 in all chemical phases, including activities that do not involve an installation?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
		Do not agree or disagree		

Please provide a reason for your response

Extension of the Safety Case Regulations 2015 to offshore CCUS activities involving CO_2 in all chemical phases, including activities that do not involve an installation is complex. It would need careful consideration to avoid overly burdensome regulations on activities where the risk is minimal or where existing regulations already provide adequate safeguards.

Question 29: Do you think that the requirements of SCR15 should apply to all offshore hydrogen production activities?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
		Do not agree or disagree		

Please provide a reason for your response

Fuels Industry UK believes that it is reasonable to expect that the SCR15 regulations could be adapted for the regulation of offshore hydrogen production facilities. This is due to the similarities in hazards between hydrogen and the oil and gas industry. However, the existing offshore safety case regulations are comprehensive, they are limited to hydrocarbon-producing installations.

A dedicated set of regulations are therefore likely to be needed for the safe and efficient development of offshore hydrogen production. Such regulations would specifically address the hazards and risks associated with offshore hydrogen production and would deliver a higher degree of safety and risk reduction.

Question 30: Do you think that requirements of DCR95 should apply to offshore CCUS activities involving CO_2 in all chemical phases, including activities that do not involve an installation?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree

		Do not agree or disagree		

Please provide a reason for your response

Fuels Industry UK does not have a detailed response to this question.

Question 31: Do you think that requirements of DCR95 should apply to all offshore hydrogen production activities?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree
		Do not agree or disagree		

Please provide a reason for your response

Fuels Industry UK does not have a detailed response to this question.

Question 32: The average annual full time equivalent salary of a Helicopter Landing Officer (HLO) is estimated to be approximately £96,000. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 33: The number of HLOs required per installation is estimated to be approximately five. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 34: The cost of training a HLO is estimated to be approximately £6,900 annually. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 35: The cost of putting maintenance and operation instructions and procedures into writing at company level is estimated to be approximately £690,000 per company. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 36: The cost of undertaking a well examination and the subsequent review by an independent and competent person is estimated to be approximately £22,000. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 37: The cost of upgrading one 4-bed cabin to a 2-bed cabin is estimated to be approximately £100,000 as a one-off conversion costs. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 38: The upfront cost of preparing and submitting a Safety Case, for either a production or non production installation, is estimated to be approximately £710,000. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 39: The cost of preparing and submitting a five year Safety Case review, for either a production or non production installation, is estimated to be approximately £240,000. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate

Fuels Industry UK does not have a detailed response to this question.

Question 40: The cost of preparing and submitting a Well notification, not including any information likely to be included in the Safety Case, is estimated to be approximately £91,000. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 41: The upfront cost of establishing a verification scheme for an independent person to ensure safety and environmental-critical elements and the specified plant are suitable and remain in good repair and condition is estimated to be approximately £1,600,000. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 42: The ongoing cost of maintaining a verification scheme for an independent person to ensure safety and environmental-critical elements and the specified plant are suitable and remain in good repair and condition is estimated to be approximately £340,000 annually per installation. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 43: The cost of regularly reviewing a verification scheme for an independent person to ensure safety and environmental-critical elements and the specified plant are suitable and remain in good repair and condition is estimated to be approximately £69,000 every three years per installation. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 44: The cost of appointing a dutyholder for an offshore installation by a licensee is estimated to be approximately £41,000 per installations. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 45: The cost of overseeing an operator of an offshore installation is estimated to be approximately £41,000 annually per installation. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 46: In addition to the per installation cost in question 45, it is estimated that there is an additional cost for a company to oversee its operators of approximately £680,000 annually per company. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 47: Please provide brief description(s) and estimate(s) of any other costs, which you consider to be the greatest costs, associated with complying with MAR95, SCR15 or DCR95 not identified here.

Fuels Industry UK does not have a detailed response to this question.

Question 48: Do you think that the requirement to provide helicopter transport, accommodation and subsistence to inspectors when undertaking regulatory activity on offshore installations should be extended to include offshore wind energy installations?

1 – Strongly Agree	2 – Agree	3 – Do not agree or disagree	4 – Disagree	5 – Strongly Disagree	6 - Don't know

Please provide a reason for your response

Fuels Industry UK does not have a detailed response to this question.

Question 49: The cost of providing helicopter travel, accommodation and subsistence for one HSE inspector is estimated to be approximately £4,800. Is this estimate about right?

1 - Much too high	2 - Too high	3 - About right	4 -Too low	5 - Much too low	6 - Don't know

If you answered 1,2,4 or 5:
Please briefly outline the reasons why you disagree with the estimate. What would be a more accurate estimate?

Fuels Industry UK does not have a detailed response to this question.

Question 50 – Do you have any further comments you would like to make about the regulation of CO_2 in pipelines, offshore CCUS operations, offshore hydrogen production or arrangements for the inspection of offshore wind energy installations?
Fuels Industry UK does not have a detailed response to this question.

Question 51 Do you foresee any unintended consequences as a result of the proposed changes in this consultation?		
Yes	No	Don't know
If you answered 'Yes' to this question, please provide a brief explanation below:		
Fuels Industry UK does not have a detailed response to this question.		

Question 52 – If you are happy to contacted by HSE for any potential follow up on your answers please provide your email address here.
Simon.wood@fuelsindustryuk.org