Department for
Business & Trade

Unlocking Business: Reform Driven by You

BUSINESS QUESTIONNAIRE

This business questionnaire closes at 11:59pm on 16 December 2025

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Contents

Introduction

Help shape a modernised regulatory environment to support growth

Britain's economic potential is being held back by outdated and excessive regulation. Businesses across the country are spending valuable time and resources navigating administrative burdens that hinder innovation, investment, and job creation.

The Government has set an ambitious target: to reduce administrative regulatory costs by **25%**. Achieving this requires the insight and experience of those who understand the impact of regulation firsthand—you.

We're calling on business leaders, entrepreneurs, and industry experts to help identify regulations that are **outdated**, **duplicative**, or **disproportionate**. Your input will directly inform how we streamline the regulatory landscape while maintaining essential protections.

Every inefficiency removed is an opportunity for businesses to grow, compete, and thrive. This is your chance to shape a more agile, responsive, and growth-focused economy.

Join us in cutting red tape and unlocking Britain's full potential.

This business questionnaire is central to delivering the Government's commitment to cutting the administrative costs of regulation. It will build on measures already announced, including in the Regulatory Action Plan[1], published in March. It will also build on the Industrial Strategy[2], published in June, and on the evidence received about regulation in response to the Green Paper[3] which preceded it.

The Government recognises that it needs to be even more ambitious. We will leave no stone unturned to identify aspects of the regulatory system, across all sectors of the economy, that impose disproportionate costs on business – stifling economic growth, innovation, and investment.

Balancing Protection and Growth

Effective regulation is a force for good. It protects consumers and the public from harms related to quality, health and safety, pricing, and excessive monopolisation. It builds confidence in UK products and services, benefiting businesses themselves.

However, we know that excessive regulation or poor regulatory practices can undermine these strengths—it is precisely these issues that the Government is

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[1] HMT (2025), New approach to ensure regulators and regulation support growth (HTML) - GOV.UK
[2] DBT (2025), Industrial Strategy - GOV.UK
[3] DBT (2024), Invest 2035: the UK's modern industrial strategy - GOV.UK

committed to identifying and tackling while maintaining the highest standards for consumers and workers.

What we need from you

The purpose of this business questionnaire is to examine the specifics of the regulatory system and focus on those precise regulations and processes which are not fit for purpose and unjustifiably inhibiting growth, innovation, and investment.

Past studies have provided a high-level understanding of the challenges posed by the UK's complex and often inconsistent regulatory system. Now, we want you—UK businesses—to identify the exact aspects of regulations or their implementation that create problems, so we can work together with regulators, consumers, and other stakeholders to bring about vital change. In doing so, you may also wish to highlight examples of good practice, which might be adopted more widely.

If you cannot name a specific regulation or regulatory process, please describe the issue and its impact on your business as clearly and precisely as possible. All feedback is valuable and will help us prioritise reforms.

Scope and Audience

Scope

What is included

This business questionnaire asks for evidence about regulations which impose burdens on business, and public sector bodies performing statutory regulatory functions, in the UK which are the responsibility of the UK (Westminster) government.

We are particularly interested in regulations which impose unnecessary and disproportionate administrative burdens on business, outweighing their benefits. These include rules that demand time, effort, and resources to comply with, often beyond the core operational needs of the business. These burdens include tasks like filling out forms, maintaining records, reporting data, and navigating complex legal procedures. They can slow decision-making, increase costs, and reduce productivity—especially for small and medium-sized enterprises. While intended to ensure compliance and accountability, excessive or poorly designed regulations can hinder innovation and competitiveness.

There are a number of different types of bodies performing regulatory functions, including:

- Dedicated regulators - bodies with specific oversight of economic sectors, activities, or occupations. These have generally been established by statute and have operational independence from government. Examples include the Security Industry Authority and Information Commissioner's Office. Dedicated regulators also include economic regulators that oversee sectors with limited competition that ensure fair prices and quality of service for customers; and professional regulators that ensure technical and professional standards are met, for example the General Medical Council and Law Society.

- Government departments and agencies - executive agencies with regulatory functions include, for example, the Maritime & Coastguard Agency, Medicines & Healthcare Products Regulatory Agency, and Intellectual Property Office. Some government departments also have regulatory responsibilities, for example, the Food Standards Agency and (within the Department for Business and Trade) the Office for Product Safety and Standards.

- Local authorities – they, for example, enforce health regulations and consumer protection laws, issue licences for various activities or handle local planning, building safety, and environmental considerations.

What is not included

The following regulators and areas of regulation are not included within the scope of this business questionnaire:

- Areas where the Government has already initiated examinations into the effectiveness of parts of the regulatory system since the July 2024 General Election. These include, for example, environmental regulators, the water sector regulatory system, Ofgem, and the Office of Rail and Road. The business questionnaire is complementary to such action and respondents are asked to focus on areas of the regulatory landscape which have not been subject to extensive scrutiny by the current Government.

- Regulators and regulations within the Devolved Governments' remit (although we will work with them where UK-wide consistency benefits business).

- Self-regulating sectors (e.g. advertising).

Audience

Our primary audience is businesses operating in the UK - from sole traders to large corporations across all sectors. We also want to hear from **innovators and investors** (current and potential) - both domestic and international. We want to understand the regulatory challenges you face day-to-day and how UK regulation compares with other countries.

While focused on business feedback, we also welcome input from: **consumer groups**, **industry experts**, **academics** and **other interested stakeholders**.

Duration, Responding and Next Steps

Duration of the Business Questionnaire

Responses to this business questionnaire are invited for eight weeks until 16 December 2025.

Responding to the Business Questionnaire

Online: https://ditresearch.eu.qualtrics.com/jfe/form/SV_cO2kwpLWsclbljw

Email to: businessquestionnaire@businessandtrade.gov.uk

Write to:

Regulation Directorate
Room 1.91
Department for Business and Trade
Old Admiralty Building
Admiralty Place
London
SW1A 2DY

Your response will be most useful if it is framed in direct response to the questions posed, though further comments and evidence are also welcome.

When responding, please state whether you are responding as an individual or representing the views of an organisation. Evidence will be reviewed thereafter by the review team. If further information or clarification is required, the review team will be in contact with you.

Next steps following the Business Questionnaire

Ideas generated in response to this business questionnaire will be thoroughly tested with all interested stakeholders before any changes are implemented. Our goal is a balanced approach that prioritises growth while protecting consumers and businesses alike.

We aim to publish the response to evidence submitted through this business questionnaire within twelve weeks of the closing date.

If you have any complaints about the way this business questionnaire has been conducted, please email: businessquestionnaire@businessandtrade.gov.uk

Summary of Structure

The business questionnaire is structured as follows:

- **Section 1: Identifying regulatory burdens to business growth and innovation:** We ask for examples of how regulations impose disproportionate costs on business, and what changes might be helpful to reduce burdens. (Questions 1 - 2)

- **Section 2: Direct costs of regulation on business:** We ask questions about the direct costs on business arising from regulation, i.e. those costs imposed by regulations themselves rather than how they operate, and ask what changes might be helpful to reduce direct costs. (Questions 3 - 8)

- **Section 3: Indirect costs of regulation on business:** We ask questions about indirect costs on business arising from regulation, i.e. costs that arise from how regulations operate in practice. These costs can arise from how regulators carry out their duties on a day-to-day basis, and mechanisms for challenging regulators' decisions. (Questions 9 - 16)

- **Section 4: Opportunity costs of regulation for business and consumers:** We ask questions on the opportunity costs of regulation, such as missed or delayed business opportunities caused by regulations and the way they operate in the UK, where possible in comparison to overseas jurisdictions. We want to understand how particular aspects of regulation are inhibiting growth and investment, and how you think this can be remedied. (Questions 17 - 21)

- **Section 5: Closing questions:** We ask some background questions about respondents to help us understand how the impact of regulation differs between different sectors and types of business. (Questions 22 - 28)

Confidentiality and Data Protection

Information you provide in response to this business questionnaire, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please tell us, but be aware that we cannot guarantee confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not be regarded by us as a confidentiality request.

We are trialling Artificial Intelligence (AI) solutions to support the delivery of our functions. Unless made expressly clear to you, we will not use AI to either make or inform decisions about you. We will apply effective data minimisation techniques to all such uses of your data.

Your responses, including any personal data, may be shared with a third-party provider, or other government department or organisation acting on behalf of the Department for Business and Trade (DBT) under contract or an equivalent agreement, for the purpose of analysis and summarising responses for us and may use technology, such as AI.

An anonymised version of responses in a list or summary of responses received, and in any subsequent review reports may be published. We may also share your personal data where required to by law. You can leave out personal information from your response entirely if you would prefer to do so.

Wherever possible avoid including any additional personal data in free-text responses beyond that which has been requested or which you consider it necessary for DBT to be aware of.

We will process your personal data in accordance with all applicable data protection legislation. See our privacy policy[4].

We will publish a government response on GOV.UK.

[4] DBT, Personal information charter - Department for Business and Trade - GOV.UK

Section One: Identifying Regulatory Burdens to Business Growth and Innovation

We want to know which regulations make business life unnecessarily difficult when balanced against the benefits they bring – both for your daily operations and when you try to grow or innovate. We also want to understand how these rules affect different types of businesses. Your specific feedback will directly inform our regulatory reform agenda.

Be as specific if possible – name the exact regulations that cause problems. If you can't name them, just describe how they affect you, and we'll work across government to identify which ones need fixing. This isn't about eliminating all regulations – it's about making them more practical and efficient.

We are interested in radical solutions to remove or simplify regulations (including through AI and digital technology). We want to make regulatory compliance more efficient, and less costly and cumbersome for your business. Even if you cannot name specific regulations, describing their operational impact will help us work across government departments to prioritise reforms.

Subsequent sections will explore the direct and indirect costs of regulation on businesses, as well as quantify the opportunity costs imposed on innovation and growth. Your expertise is invaluable in creating a regulatory environment that protects necessary standards while enabling British businesses to thrive and compete globally.

Question 1

(a) Are regulations in your sector imposing unreasonable costs on **your business's** current activities?

Yes

(b) Are there regulations which are limiting **your** ability to grow **your business** further and/or innovate for the future?

Yes

(c) Do you think regulations in your sector are creating more unnecessary problems (costs or restrictions) for **certain types of businesses or business activities than others**? For example, do they affect small businesses differently from large ones, or impact certain business models more heavily than others?

No

(d) If you have answered "yes" to any of the above questions, please give **specific examples** with evidence below, if possible naming individual regulations, or regulatory activities.

There are specific regulations as well as the interaction with their implementation that are adding to the overall regulatory burden for fuels suppliers. Examples include:

A) Unreasonable costs / reporting -

*i) **Reporting and verification of renewable fuel volumes:** Under the RTFO there is opportunity for rationalising verification of obligated fossil fuel volumes. These volumes are currently billions of litres in any calendar year for fuel suppliers but highly detailed verification is required precisely to the litre, for little practical benefit. Reporting into DESNZ for example is only required at the tonne level rather than the litre, which given that billions of litres (Millions of tonnes) are delivered annually, would appear to be proportionate as well as reducing the administrative reporting burden. Similarly with the RTFO, there are other administrative burdens from the revocation and resubmissions for minor errors (even typos) in reporting, which do not materially affect sustainability reporting, but which add to reporting requirements for companies.*

*ii) **Climate Related Transition Plan requirement** for subsidiaries: Proposals consulted on in 2025 on climate related transition plan reporting requirements offer an example of a new regulatory requirement being proposed which will not practically offer the benefits the policy aims to deliver while potentially becoming a significant new reporting requirement for companies.*
The proposals suggest that all UK companies over a certain size will need to deliver climate related transition plans with the policy intent of helping better inform investors of climate impacts on business. However, in the case of UK registered private subsidiaries of foreign multinational parents, investors are not able to invest in the subsidiary Company. Given the intent of the proposals is to help investors, it is not obvious how expecting subsidiaries to report can meet the objective. An exemption to the reporting requirement would appear appropriate as these parent companies often follow internationally recognised frameworks such as CSRD, ISSB, TCFD, or SEC disclosure rules, which offer equivalent or overlapping coverage with the UK sustainability disclosures.

B) Restricting Innovation –
*i) **Development fuels obligations under the Renewable Transport Fuels Obligation** – this policy originally had the aim of stimulating innovation, however, due to unclear an restrictive approvals it has only done so in a very constrained way.*
Companies have come forward with proposals for development fuels to the DfT but a significant number have been rejected on various grounds such as the renewable feedstock type not meeting the DFT requirement or the development fuel not meeting minimum blend thresholds into petrol or diesel (typically 25% minimum).
Due to there being insufficient clarity on what would qualify as a development fuel (the EU has a clearer definition), companies have seen wasted time in developing proposals without a clear framework and a lack of investment in development fuel manufacturing plants in the UK. The policy is also not helped by proposals to change policy on development fuels where once projects have been approved particularly for refinery-based fuels and those that co-process fossil alongside renewable feedstocks. Investors have committed capital based on current eligibility criteria; changes to exclude refinery-based fuels risk stranding assets and

undermining confidence in the RTFO. A stable, inclusive policy framework is essential to unlock further investment in low-carbon fuels.
This example also serves as one which results in unreasonable costs as the lack of available development fuels means that companies must purchase buy-out of their obligation.
Given the lack of clarity and lengthy approval times for development fuels, a policy review to incorporate learnings and clear updates to the RTFO guidance to broaden definitions and streamlines approvals could remove barriers to more development fuels coming forward and being invested in.

ii) ***Bio feedstock trials and permits under Environmental Permitting Regulations*** *- proposals to run trials where bio feedstocks would be co-processed alongside fossil fuels by the Valero Pembroke Refinery were delayed by insufficient resources to efficiently process applications. This would be a process which helped move towards lower carbon fuel production which are wanted by government policy, but again the potential for innovation is restricted due to regulation.*
Similarly, while the Environment Agency (EA) have been supportive in allowing industrial trials of Development Fuels at refineries where the permit allows for some processing, issues have arisen when companies look to increase the volumes and the ways in which feedstocks are processed. Permit variation application is very challenging when looking to expand the types of feedstocks available to process.

iii) ***Waste and renewable feedstock frameworks under Environmental Permitting Regulations*** *– companies have been working with the Environment Agency on the development of a Resource Framework for Tyre Pyrolysis Oil since 2022. This has been undertaken by the EA Resources from Waste Team, with costs of £40k+ charged out to the lead association and the process has still not completed. Other countries have found ways to move forward with similar projects showing the restriction due to the UK's systems and processes.*

iv) ***Restrictions on use of handheld electronic devices in COMAH sites (under DSEAR 2002 regulation)*** *– Fuels Industry UK has been working with members to argue in favour of (limited and controlled) use of conventional handheld electronic devices on sites given specifically designed devices (often known as "ATEX rated" or "non-Ex") for dangerous workspaces are not as practical or flexible. This is already allowed in some specific cases with no recorded incidents, but is not consistently applied meaning some sites are not able to make use of such devices. Phones, tablets, smart watches and medical devices (such as insulin pumps and hearing aids) can provide many safety, reliability and efficiency benefits including:*

- *Easy access to important documents and databases on site which may be helpful to have in the field*
- *Facilitating quick and accurate reporting of incidents and defects including photos and videos (that may not be possible with ATEX rated alternatives)*
- *Location and Tracking Services*

Question 2

How can we cut down on the paperwork and administrative burdens created by regulation and regulators, and with what positive effects? You should name specific regulations, regulators, and/or regulatory activities wherever possible.

Total reporting requirements of fuels sector

Policy	Energy Use	Energy Intensity	Potential Projects	Company Data	Inventory	Supply	Production	Incidents	Acquisition Data	Import Volumes	Import Values	Import Sources	Export Volumes	Export Values	Export Locations	Fuels Data	Emissions of Pollutants	Carbon Intensity of Fuels	Processes	Pump Prices	CO2 Emissions	Volume of Waste	Type of waste	Management Plan	Energy Source	Monitoring Plan	Verifications / QA	Improvement Report	Accounts	R&D	Company Governance	Chemical composition	Infrastructure / Assets	Resource RAG	andatory / By Agreement / Other	Reporting frequency
Energy Savings Opportunity Scheme (ESOS)	Y	Y	Y																						Y		Y							R	M	4 years
Downstream Oil Reporting System and Digest of UK Energy	Y				Y	Y	Y			Y	Y	Y	Y	Y	Y				Y						Y		Y						Y	R	B	Monthly (can be more frequent in emergencies
COMAH Safety Report				Y	Y														Y									Y			Y	Y	Y	R	M	5 years
UK Emissions Trading Scheme	Y	Y		Y			Y									Y			Y		Y				Y	Y	Y	Y			Y		Y	R	M	Annual
Annual Business Survey				Y			Y				Y			Y															Y	Y				R	M	Annual (Sampling if a smaller company)
Renewable Transport Fuel Obligation				Y		Y	Y			Y		Y						Y									Y				Y			R	M	Monthly
SAF Mandate				Y		Y	Y					Y						Y									Y				Y			R	M	Monthly
Excise				Y		Y	Y									Y																	Y	R	M	Monthly
Customs				Y	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y																	Y	R	M	Monthly
Environmental Permitting Regulations			Y	Y				Y									Y		Y					Y	Y	Y	Y	Y			Y			R	M	Monthly
Mandatory climate-related financial disclosures	Y	Y		Y	Y		Y														Y								Y		Y		Y	R	M	Annual
REACH / CLP				Y			Y			Y			Y			Y																Y		R	M	When trigger reached - regular
Cyber Assessment Framework																																		R	B	Ad Hoc (less than annual)
NIS Directive - Incidents				Y				Y											Y												Y			R	M	When trigger reached - regular
Core Fuels - BAU (infrastructure surveys for both refinery/terminals and				Y	Y	Y	Y																								Y		Y	G	M	Annual
National Security and Investment Act									Y																									G	M	When trigger reached - rare
Digest of UK Energy Statistics (DUKES): calorific values and density of fuels																Y																		G	B	Annual
Energy Intensive Industries Compensation Scheme	Y			Y			Y																		Y				Y		Y		Y	G	O	Not Eligible
Energy Intensive Industries Exemption Scheme	Y						Y														Y				Y									G	O	Quarterly
Companies Act				Y																	Y								Y		Y		Y	G	M	Annual, when trigger reached - regular
Fuel price reporting																				Y														G	B	Weekly
Biofuels Survey					Y	Y	Y						Y																				Y	G	B	Annual
Core Fuels - Incidents								Y																							Y			A	M	When trigger reached - regular
National Atmospheric Emissions Inventory (NAEI)				Y				Y									Y				Y					Y								A	B	Annual
RIDDOR				Y				Y																							Y			A	M	Annual
COMAH notification				Y	Y														Y												Y		Y	A	M	One off
Fuel Finder				Y																Y											Y			A	M	When trigger reached - regular
Compulsory Stockholding of Oil					Y																										Y		Y	A	M	Monthly
Streamlined Energy and Carbon Reporting	Y		Y	Y																	Y													A	M	Annual
Business Rates				Y																													Y	A	M	Quarterly
Red diesel				Y		Y										Y																		A	M	Monthly
Fuel Quality Data Reporting																Y																		A	M	Annual
Waste Management Plan				Y	Y		Y															Y	Y	Y		Y			Y					A	M	Annual
Rules of Origin				Y		Y	Y			Y		Y	Y																					A	M	When trigger reached - regular
Plastic Packaging Reporting				Y			Y			Y			Y																					A	M	Quarterly
Pollution Inventory				Y													Y					Y	Y		Y	Y	Y							A	M	Annual
Pollution Inventory (Scotland)				Y													Y					Y	Y		Y	Y	Y							A	M	Annual
Hydrogen Production					Y	Y	Y																		Y									G	B	Annual
Terminal Survey				Y	Y	Y	Y			Y						Y																	Y	A	B	One off
Pipeline Survey				Y		Y				Y						Y															Y		Y	A	B	One off
	7	3	3	27	11	11	18	5	1	7	3	5	6	3	2	8	4	2	6	2	6	3	3	2	9	6	8	3	5	1	15	2	14			

The snapshot above captures data reporting requirements for fuels suppliers in the UK, with heavily simplified assessments of what information is to be reported along with an indicative RAG status of the reporting burden of each. The sheer volume of reporting requirements shown above is in itself an issue of regulatory burden which imposes cumulatively high costs of compliance for day-to-day business as well as reducing the attractiveness of the UK as a place to do business in the longer term. The matrix above also highlights potential areas of duplication of reporting on companies with multiple areas (company data, inventories, supply, production, governance and infrastructure) being reported into at least 10 different points within regulators and Government. Finding means for companies to only report such information once into government would offer a relatively simple means to reduce existing reporting burdens.

As per the list of 40 separate reporting requirements above which must be met to operate in the fuels sector, there is considerable overlap which could be removed and reduce unnecessarily duplications of reporting, reducing costs of regulatory compliance for companies as well as potentially within government if only one dataset needs to be provided / handled.

In terms of how best this could be delivered, options such as mapping of requirements (undertaken by the relevant teams) could be a suitable way to identify and then in turn better share information within Government, however, other options, such as a single point of reporting for multiple HMG requirements may also be a means to reduce duplications. While this may have good reasons to be limited for large volumes of data (sensitivities on handling and accessing data even within HMG for example) making better use of even basic data e.g. of Companies House data by directly linking it to reporting requirements elsewhere could reduce the need for company and governance data to be replicated

Duplicative reporting:

As the table shows, there are a considerable number of reporting requirements into HMG which appear to overlap and should be considered further to reduce administrative burdens. If we consider specific information types then we see that companies report the following types under more than 10 individual reporting requirements:

- Production and supply levels

- Inventory levels

- Infrastructure / assets

- Company and Governance data

As noted in the response to Q1 we would also flag that ***Reporting and verification of renewable fuel volumes*** *under the RTFO offers an opportunity for rationalising verification of obligated fossil fuel volumes.*

Section Two: Direct Costs of Regulation on Business

In this section we want to hear about the **direct** costs imposed on business by regulation. These are costs businesses must meet when laws require them to take specific actions, with little or no flexibility in how they comply. Indirect costs, i.e. those incurred because of how a regulator decides to fulfil its role through the processes it adopts etc, are examined in the next section.

This part of the business questionnaire focuses on four ways in which regulations and regulators may impose **direct** costs on a business:

- Information requirements
- Investigations, inspections and enforcement
- Further regulatory activities
- Regulatory structures and strategic prioritisation

Further information to help you answer the questions in this section is provided under each subheading below. Please be as specific as possible in your answers, providing clear examples to make your points and explaining how you think these issues can be addressed.

Your detailed examples will help us develop a comprehensive understanding of regulatory cost distribution across different business sizes and sectors, informing our efforts to create a more proportionate and efficient regulatory environment.

(A) Information Requirements

Regulations often impose a range of information obligations on businesses, including to:

- *Provide information to government bodies and/or regulators*. This can include for registration or notifications in relation to particular activities; periodic reporting on regulatory compliance; and/or making applications for any sort of licence or authorisation in relation to a regulated activity, or for an exemption from those requirements.
- *Provide information to third parties*. This can include requirements to label products or installations with specified consumer information; or to make other information, e.g. a financial prospectus to accompany investment products, available in certain circumstances.
- *Keep and maintain specified documents and records*. This might include keeping copies of some records for minimum time periods or maintaining up to date manuals on issues such as emergency planning.

Question 3

In relation to such rules:

(a) What information or reporting does your business have to provide to regulators that creates unnecessary burdens? Please be as specific as possible.

(b) As noted in response to Q2, there are well over 40 separate policy-related reporting requirements on typical fuels businesses with duplication making much of it unnecessary if information was more accessible among regulators and departments.

(c) One notable example of duplication from that table that creates notable unnecessary burdens is under ***Pollution Inventories which duplicate with Environmental Permitting Regulations reports****. The detail which is reported under EPR is extremely detailed for the purposes of regulatory compliance, and the pollution inventories which companies must also feed into add no value to the companies themselves. As such, and given the information is already available within Government, the pollution inventories should not be a separate reporting requirement but could be produced.*

(d) ***Reporting of environmental and climate impacts/assessments across a number of requirements*** *is also an area where there has been an increase in potential for overlapping reporting from companies. The Streamlined Energy and Carbon Reporting duplicates some data already in public domain/HMG reported under the Energy Savings Opportunity Scheme & the UK Emissions Trading Scheme. Similarly, Mandated Climate Related Financial Disclosures has overlap with Companies Act and other data sources. All of the above are large reporting burdens even individually, so avoiding duplications and overlap could offer significant savings if rationalised.*

(e) As a more sector specific example, the fuels sector and the Environment Agency are currently considering whether it is appropriate for companies to report ***small losses of primary containment*** *as little as 5 litres of product, as proposed by the regulator. This proposal goes considerably beyond industry's interpretation of permitting requirements for Losses of Containment with minimal/manageable environmental impact given that losses of that scale are lower than what is already permitted (and reported on) within environmental permitting legislation, as well as being losses within primary containment, so not straying into the environment given there are other secondary and tertiary levels of containment at our sites too. As such, this reporting appears completely unnecessary.*

(f) As noted in response to Q1, ***reporting and verification of renewable fuel volumes is at an unnecessarily detailed level****. Under the RTFO there is opportunity for rationalising verification of obligated fossil fuel volumes. These volumes are currently billions of litres in any calendar year for fuel suppliers but highly detailed verification is required precisely to the litre, for little practical benefit. Reporting into DESNZ for example is only required at the tonne level rather than the litre, which given that billions of litres (Millions of tonnes) are delivered annually, would appear to be proportionate as well as reducing the administrative reporting burden.*

b) For any requirements identified in your answer to question (a), how much money does your business spend and how many staff hours are devoted to meeting these requirements? Please provide specific cost and time estimates if possible.

For reporting under RTFO, it is common for companies to have 1 dedicated FTE for the reporting requirement.

c) What changes would you make to reduce these burdens?

For areas noted above where level of reporting is the issue (e.g. Loss of Containment, RTFO) we would recommend consideration of reporting needs to be proportionate to the policy being implemented e.g. tonnes a better measure for RTFO. Loss of Containment reporting should be based only on Environmental Permitting Regulation level reporting not just all losses of containment above 5 litres, which has not been justified to date.

For the other areas flagged, it is a case of rationalising reporting where there is duplication and overlap and keeping the information requirement only to what is necessary for delivery of operational or regulatory need (such as the various climate and environmental reporting being reduced to e.g. ESOS, UK ETS, with SECR and MCRFD information taken from that existing data), which may be improving data access between government departments, or simply removing reporting burdens on companies if government already has the data elsewhere (as with the pollution inventories)

(B) Investigations, Inspections and Enforcement

Regulations often contain requirements that regulators conduct periodic inspections and investigations, or powers to enable them to do so where they consider it appropriate. Failure to comply can result in enforcement action including fines, requiring a business to do certain things, or even prosecution. Some of the need to co-operate with enforcement bodies is the inevitable consequence of an enforcement regime, but some requirements may feel disproportionately burdensome for your business.

Your insights will help us identify how the current investigation, inspection and enforcement regimes can be made more proportionate – focusing resources where risks are greatest and reducing unnecessary burdens.

Question 4

(a) What does your business have to do for regulators' investigations and inspections which you feel is unnecessarily burdensome? Please be as specific as possible.

Regulators' inspections for the sector are all planned and agreed in advance – some data requests are burdensome on time and effort. In some cases it is apparent that they have not been looked at as the inspectors ask questions that they have the answers to in writing which adds to the burden as well as directly adding to costs given that inspections are a chargeable activity. The UK's Health and Safety Executive (HSE) charges businesses an hourly regulatory cost through its "Fee for Intervention" (FFI) program. As of 2024, the rate is £174 per hour, which applies when inspectors identify and address a "material breach" of health and safety law.

(b) For any requirements identified in your answer to Question (a), how much money does your business spend and how many staff hours are devoted to meeting these requirements? Please provide specific cost and time estimates if possible (but exclude any penalties that might be levied through enforcement action).

Please provide your answer here.

(c) What changes would you make to reduce these burdens?

It would be important to ensure that regulators at the local level are meeting their KPIs in terms of being prepared for inspections, which is not always the case as highlighted above. Other jurisdictions many countries do not directly charge businesses for regulatory inspections unless serious violations are uncovered. For instance, while the U.S. Occupational Safety and Health Administration (OSHA) imposes penalties for safety violations, it generally does not impose direct inspection fees. Similarly, EU countries may fund regulatory inspections through general taxation rather than charging businesses directly at a high hourly rate.

(C) Further regulatory activities

The Government has already announced a range of measures to simplify this landscape, so that it is easier and less costly for business to navigate while continuing to act in consumers' and the wider public interest.

In this section, please provide evidence of any additional ways in which legal obligations imposed by a regulator have created unnecessary burdens or operational challenges for your business. This may include requirements stemming from a regulator's statutory duties or discretionary powers that compel businesses to take specific actions, even when those actions may not be proportionate or clearly aligned with business needs.

We also would like to understand whether and how you think regulators should be doing more to drive growth. Under the Deregulation Act 2015, certain regulatory bodies must have regard to the desirability of promoting economic growth under the "Growth Duty", alongside various other duties. The Government announced on 21 October that it intends to reform the Growth Duty so that the legal framework is clearer, more focused and elevated to ensure regulators must actively consider and promote growth.

Question 5

(a) In questions 3-4 above, we asked you about what you have to do to meet regulators' information and inspection / investigation / enforcement requirements. Do regulators make other demands of your business outside these categories which result in it facing unnecessary challenges?

Yes

(b) If you answered “yes” to question (a) above, what does your business have to do which you feel is unnecessarily burdensome?

In October the EA announced a “trial” that would require reporting against the proposals thresholds on an annual basis from the 1 January 2026. This goes beyond what is required by the Environmental Permits and current regulations. This significantly moves the goal posts. The trial is focussed on 3 refineries and not Environmental Permitting Regulations (EPR) regulated industry – this is not fair because under EPR any changes need to be implemented across all regulated industry following formal consultation. The Association is concerned that the data gathered will be used to develop overly-stringent reporting thresholds that will add to the future reporting burden.

The Association’s view remains that EA’s desire for refineries to report minor loss of primary containment is not in line with permit regulations.

(c) How much money does your business spend and how many staff hours are devoted to meeting these requirements? Please provide specific cost and time estimates if possible.

Please provide your answer here.

(d) What changes would you make to reduce these burdens?

Please provide your answer here.

Question 6:

(a) Do you believe the regulators you deal with adequately support economic growth in your sector?

No.

(b) If not, please provide evidence of how this could be improved if they had a stronger legal duty to promote economic growth alongside their main objectives?

A change of mindset may be the most direct way to address the growth duty more effectively as regulators are both aware and mindful of the duty in our sector's experience, however, the mindset change could be to "start with yes" when considering changes to operations which are within scope of regulations – particularly those with growth potential.

It is particularly the case that with innovative technologies and applications, that it can be very complex and burdensome to get permits from regulators – we have seen examples of information requests for information that may not yet exist due to it being of a novel technology and having to provide such information may result in long delays or even cancellation of plans. It should be noted that the Environment Agency has introduced flexibility around site waste regulation; there is now a standard rules permit which provides greater flexibility for companies who want to trial something new for 12 months, which is exactly the sort of approach which we should look to be applying in other areas.

The growth duty also does not feel of top priority in instances where permitting is not progressed as quickly as it could be. We are aware of a September permit variation application from a refinery to add the set of Standard Rules - Research and development at a Part A(1) installation (SR2024 No 1) – a very simple addition to a permit. Two months later an update on progress was requested which came back that the application was yet to be allocated. Given that the variation requested was a simple one – requiring little determination and no specific skills or knowledge – working on the assumption that this could be quickly agreed and progressing it, rather than adding it to an allocation list based on an assumed level of complexity which in this case is simply not there. This also gives an example of where better screening of requests / or even a classification system to bring simple requests or those which prioritise growth to the fore could avoid such delays.

(D) Regulatory Structures and Strategic Prioritisation

We would like you to identify regulators that perform with similar, overlapping, or potentially redundant functions and consider whether these could be consolidated or, or, where appropriate, abolished. Please highlight areas where regulatory oversight is fragmented by such instances. Multiple agencies are responsible for overseeing different aspects of the same business activity. We encourage you to suggest specific opportunities for streamlining these processes in ways that would reduce the compliance burden on businesses, while still maintaining the integrity and effectiveness of regulatory objectives.

Finally in this section, we want you to recommend areas where more binding government guidance to regulators about how to weigh up competing priorities (sometimes called "strategic steers") would benefit business planning and operations. This might include where you think that regulatory priorities appear misaligned with market realities or business needs. An example of a recent strategic steer is that issued to the Competition and Markets Authority in May 2025.[5]

[5] DBT (2025), Strategic steer to the Competition and Markets Authority - GOV.UK

Question 7

(a) Would **combining or streamlining the number of regulators** save your business money, including where you think they do similar or overlapping work?

n/a

(b) If you answered "yes" to question (a), please provide **further detail** here making clear which regulators, and similarities or duplication, you are referring to.

Please provide your answer here.

Question 8

(a) In which of the following areas do you think that regulators need clearer and stronger guidance from government to help them do their jobs better?

*To balance competing priorities / To manage risk / **To support growth / To improve regulator accountability** / To help regulators in another way / They do not need more*

(b) Please provide further information about the regulators you are thinking about when answering this question, and any evidence for thinking such binding guidance is needed?

In support of growth, this is an area where there is known to be guidance to regulators and where senior level engagement with Regulators tends to be positive, however, at the site-inspector level, we sometimes find greater issues of implementation and interpretation. Cost Benefit Analyses (CBA) are there to be used and to help support growth – they have a clearly defined mechanism and can include flexibilities for how environmental pollution is measured and controlled across complex sites (such as the 'bubble methodology') exist. However, they tend to be used at the end of a process and only following request from a regulated entity – this means that companies are having to effectively 'remind' the regulator of their requirement to support growth. As noted in the response to 6b, there are examples where the growth duty could be better delivered with a starting point of saying 'yes'.

In terms of regulator accountability, there is clearly a careful balance to be struck, but our sector has seen examples in recent years where regulators' efforts to be more transparent and accountable have unfortunately led to them being more inflexible and adding to burdens for companies. We view that a good relationship with a regulator should mean sites are able to work collaboratively with a regulator to test approaches before having to submit the more formal requirements of setting permits and the like. Formal written submissions will certainly be required at the appropriate point, and in some cases a regulator will need formal evidence to take even indicative views, however, requiring full submissions before a decision can even be commented upon means that an iterative permitting process may be required, wasting resource on both sides, while not necessarily getting towards a determination any faster. Clarity of the transparency and accountability needed and expected in advance of the formal application of permits could reduce burdens and improve the opportunity for collaborative relationships.

Section Three: Indirect Costs of Regulation on Business

In this section, we're seeking evidence on the **indirect costs** of regulation—those sometimes less visible but still significant burdens that arise from how regulators implement and enforce rules, and how businesses must adapt to regulatory procedures.

These costs may include:

- **Processes created by regulators** that go beyond legal requirements.
- **Delays** in decisions, approvals, or authorisations.
- **Time and resources** spent navigating complaints or challenging decisions.
- **Customer service and communication issues** that affect business efficiency.

We're particularly interested in **specific examples** that highlight how these issues impact your operations and bottom line, including which regulators are involved and what changes could help reduce these burdens.

This section focuses on three key areas:

- Regulator delays and timeliness
- Regulators' operational processes and behaviours
- Challenging regulators' decisions

Further guidance is provided under each subheading. Please be as specific as possible in your responses—your insights will help us identify practical ways to reduce unnecessary procedural costs and free up resources for growth and innovation.

(A) Regulator Delays and Timeliness

When regulators aren't clear about their timeframes or fail to meet them, businesses face uncertainty and additional administrative burdens due to delayed decisions and follow-up requirements. The Regulatory Action Plan[6], published in March 2025, introduced measures to hold regulators to account more effectively, to improve regulator accountability through performance transparency. Regulators have now published their Key Performance Indicators (KPIs) on dedicated webpages and are engaging with stakeholders to ensure these metrics genuinely reflect performance.

We aim to go further, so in this section we would like to hear sector-specific evidence about the timeliness of regulatory decisions, including the extent to which regulators

[6] DBT (2025), New approach to ensure regulators and regulation support growth (HTML) - GOV.UK

are transparent about their own performance standards, how they meet them, the costs incurred by business, and changes in regulatory practice that could address issues identified.

Question 9

Do you think regulators are sufficiently transparent about their expected and actual delivery times, by:

(a) Having the right Key Performance Indicators (KPIs) to measure their performance?

Yes

(b) Providing updates on progress in reaching decisions?

Yes

(c) Please provide specific examples referring to named regulators here.

Please provide further detail here.

Question 10

(a) Has your business experienced delays by regulators, such as a delayed approval / authorisation / licence?

No

(b) If yes, please specify the regulator and relevant process(s) where you can do so.

If yes, please provide further detail here.

Question 11

How much do delays caused by regulators cost your business? Provide examples in either lost days or revenue or increased financial costs if possible.

Please provide your answer here.

Question 12

How do you think regulators could make decisions faster and reduce delays? Please suggest specific improvements that would help speed up regulatory processes.

Regulators are assessed against specific KPIs e.g. for time taken to assess a permit or planning decision, however, in practice these indicators are defined very narrowly and do not consider the total time and implications of decisions on final investment decisions – considering indicators that are better able to account for practical implications on project delivery should be explored.

(B) Regulators' Operational Processes and Behaviours

The procedures that regulators develop to carry out their role can also add significantly to businesses' administrative costs. Sometimes regulations require regulators to act in particular ways (see section on direct costs) but they often have a considerable degree of discretion about how they perform their roles. In some instances, businesses also have to rely on third party service providers to support them in regulatory compliance.

Businesses will always necessarily have to absorb costs so regulators can protect consumers and the public, but these costs must be minimised wherever possible. Digitalisation and the efficient information sharing between regulators can, for example, reduce administrative burdens on business. In this section we ask for sector-specific evidence about issues including where and how the processes regulators impose unnecessary costs; regulators' transparency about the impacts of their actions; and procedural improvements that might be made to reduce administrative costs to business.

Question 13

(a) Can you provide examples of where regulators use outdated or unnecessarily complex processes (including where two regulators' processes may overlap)?

Yes – planning and permitting

(b) If yes, please provide evidenced examples.

Nationally Significant Infrastructure Projects (NSIPs) benefit from set timelines and penalties for delays. In contrast, locally processed industrial projects face no such certainty.

Environmental and safety permitting is often not synchronised with planning, forcing developers to delay work or submit incomplete designs that later require variations.

Strategic organisations—like the National Infrastructure Commission—lack the authority to coordinate or enforce planning decisions across administrative boundaries.

Good practice should be learned from with infrastructure brought forward through the Nationally Significant Infrastructure Projects (NSIP) regime, offering industries a system that is set up to enable development with timelines – with penalties on the planning inspectorate if they are not met. This means that for large nationally significant infrastructure development there is more certainty for investors. There is also early engagement with the Planning inspectorate on NSIP applications that improves understanding of a project ahead of application, helping speed up the process, reduce wasted cost and lead to applications being accepted at the first pass. However, for industrial sectors that must go through the local planning system there are no penalties on the planners for delays on decisions. National guidance can be interpreted differently by individual planning inspectors which means there is inconsistency across the country for the same equipment.

Question 14

(a) Do regulators provide sufficiently clear guidance about their requirements and processes when submitting an application (such as for a licence or permit) or other information?

No – based both on specific pieces of guidance (HSE example below) as well as more general issues seen commonly across guidance (CMA example below)

Fuels Industry UK has significant concerns with the ***HSE's approach to predictive risk*** *has resulted in the withdrawal of the association from the Chemical & Downstream Oil Forum (CDOIF) the voluntary body through which HSE is producing their guidance. The HSE's Predictive Risk Assessment principles are being applied – both in interventions and in Safety Report submissions. One refinery has been strongly advised to apply the CDOIF method via their Safety Report. However, they have taken the view that they are "free to select any appropriate approach they wish to". Another refinery is in the process of developing their next Safety Report submission and they have also taken the view that they are "free to select any appropriate approach they wish to". Two terminal operators have been forced to adopt the CDOIF approach. This is despite the HSE's position that any adoption before completion of the CDOIF approach would have been done in conjunction with the Lead Unit at HSE and because the site was keen to test out the guidance. One of the operators followed the approach to the letter and concluded that the approach did not deliver any fundamental change to the safety profile of their site.*

The ***CMA's draft enforcement guidance*** *on the Fuels Finder scheme which will be introduced at the end of 2025 offers an example of where guidance is not as clear as it could be indeed in their response to the consultation, they have committed to making improvements for the final version (as yet unpublished) in particular:*

- *when we will use our powers*
- *what action we will take*
- *how we will determine the level of any fines"*

However, the concerns we have with the draft apply in other areas and are outlined below:

- **Language in regulation or guidance can often be open to interpretation** e.g. "reasonable belief" (of non-compliance in this case) is an inherently unclear term.
- The same also applies to a "reasonable excuse", and while there was an example given in the draft guidance of what a reasonable excuse might be, this attempted clarity was undone by a qualifier later on which said the mitigation example given "might amount to a reasonable excuse" thereby not being more clear at all.
- **Related / interlinked guidance needs to be available at the same time –** The CMA draft guidance was issued for comment before related guidance (from the data aggregator) had issued their own guidance. This makes it impossible for businesses to fully understand the processes involved in this example.

There is a wider concern our sector has with regard to the Fuel Finder, in that it is itself an example of where regulation – delivered from DESNZ and enforced by the CMA – has gone above its original scope and intent and risked creating a disproportionate burden. The original recommendation from CMA was to increase price transparency in the sector. However this new regulation on the sector has evolved and is disproportionate as it requires reporting by companies of things beyond the live price reporting and threatens large fines (5% of global turnover) or potential custodial sentences for non-reporting of non-price items such as whether the petrol station has a car wash or not. Such scope creep of regulation is unhelpful for business and makes the UK a less attractive place to do business.

(b) Do regulators clearly explain how their decisions, guidance and rules affect business and consumers?

n/a

(c) If not, please provide evidenced examples.

n/a

Question 15

What changes should regulators make to their internal procedures, for example by digitisation or simplified reporting, to reduce administrative costs on your business?

n/a

(C) Challenging regulators' decisions

Businesses may also incur indirect costs where they decide to challenge regulators' decisions – for example where they disagree with a licencing decision or in response to an unfavourable outcome. Typically, after any internal appeals mechanism within a regulatory body is exhausted, it will also be possible to appeal further. Who considers such appeals will vary between regulatory regimes, and includes the relevant Secretary of State, the Competition and Markets Authority (CMA), the Competition Appeals Tribunal (CAT), the First-tier and Upper Tribunals, the Magistrates Court, and the High Court. Within these, there is a significant variance in grounds, complexity, time and cost.

Question 16

(a) Do you think that mechanisms for your business to challenge a regulator's decision are unnecessarily complex or burdensome?

n/a

(b) If yes, in what ways is the process for challenging a regulator's decision which you feel is unnecessarily complex or burdensome for your business? Please be specific about the regulator being challenged and the type of decision being challenged.

n/a

(c) If yes, how much money does your business spend and how many staff hours are devoted to meeting these requirements in order to challenge a regulator's decision? Please provide specific cost and time estimates if possible.

n/a

(d) If yes, have you decided to leave a decision you disagreed with unchallenged due to the potential cost of the challenge?

n/a

(e) If you answered yes to question (d), please give details of the decision and also of any time and cost estimates you used when deciding not to proceed with the challenge.

n/a

(f) What changes would you make to appeal mechanisms to reduce the costs they impose on your business? This might, for example, include simpler administrative processes, greater use of regulatory tribunals, or greater consistency of approach in terms of appeal mechanisms between regulators.

n/a

Section Four: Opportunity Costs of Regulation

The first three sections of this business questionnaire ask for your views on how regulations affect your existing business operations. In this fourth set of questions, we focus on the impact of regulation on business' potential future activities. We want to hear how the UK's regulatory regime impacts on business decisions on the trialling and rolling out of new products and services, working practices, innovation, attracting investment, and international trade.

As in the previous sections of this business questionnaire, you should be as precise as possible in your answers, so we can identify exactly where within regulatory processes change would be most beneficial.

Question 17

(a) Have you decided not to bring a product or service to market because of regulatory issues, such as uncertainty, delays, costs or other impacts?

No

(b) If yes, please provide examples to explain why this is the case.

n/a

Question 18

(a) Have you decided not to adopt new technology or working practices in the UK because of regulatory obligations or uncertainty?

No

(b) If yes, please provide examples to explain why this is the case.

n/a

Question 19

What improvements in the regulatory environment could better support you in bringing new products or services to market, or to adopt new technology or working practices?

n/a

Question 20

Are there any areas where you would like to see the government test new approaches to regulation (i.e. adoption of ‘fast-lanes’ for approvals), disapply regulation to allow innovation in a controlled environment (i.e. a sandbox) or create dedicated services within government support businesses in their interactions with regulators they need to engage with? Please provide examples.

n/a

Question 21

Please provide details of any international best practices in your sector in other major economies that the UK should consider adopting to ensure our regulatory system supports innovation and growth?

n/a

Section Five: Closing Questions about Respondents

Question 22: This business questionnaire is targeted primarily at businesses, however we appreciate that other stakeholders may also wish to respond. Therefore please select the most appropriate option that represents you, and respond according to your primary responsibilities.

- Regulated entity (i.e. business)
- Consumer
- Regulator
- Academic or think tank
- **Other**

Trade Association

Question 23: If you are a business, which regulators do you engage with most frequently?

The sector engages closely with the HSE, EA, NRW and SEPA as well as central government departments who have regulatory functions e.g. DESNZ (resilience measures for fuels) and DfT (RTFO).

Question 24: If you are a business, how many employees do you have?

- Not Applicable – not a business
- **1 – 9 employees**
- 10 – 49 employees
- 50 – 99 employees
- 100 – 499 employees
- 500+ employees

Question 25: If you are a business, please name the Sector(s) that you operate in using the UK Standard Industrial Classifications published by Companies House.[7]

94110 - Activities of business and employers membership organisations

Activities of companies we represent include include:

19201 - Mineral oil refining

46711 - Wholesale of petroleum and petroleum products

[7] Companies House, https://resources.companieshouse.gov.uk/sic/

Question 26: Please select where your headquarters are based using the categories under the statistical regions set out by the Office for National Statistics (ONS).[8]

- East Midlands
- East of England
- **London**
- North East
- North West
- South East
- South West
- West Midlands
- Yorkshire and the Humber
- Scotland
- Northern Ireland
- Wales
- International

Question 27:

a) What is your name, or the name of your organisation?

Fuels Industry UK

b) What is your e-mail address (optional response)?

Jamie.baker@fuelsindustryuk.org

Question 28: We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

- **Yes**
- Yes, but without information which could identify me as an individual
- No, I want my response to be treated as confidential

[8] Office for National Statistics, International geographies - Office for National Statistics

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Department for Business and Trade

The Department for Business and Trade is an economic growth department. We ensure fair, competitive markets at home, secure access to new markets abroad and support businesses to invest, export and grow. Our priorities are the industrial strategy, make work pay, trade and the plan for small business.

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