



North Sea  
Transition  
Authority

# Consultation on the publication of company specific information

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Date of publication 29 August 2024  
Closing date 31 October 2024

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The document can be found on the NSTA's website.

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Published by the North Sea Transition Authority

# General information

## **Purpose of this consultation**

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The North Sea Transition Authority (**NSTA**) is the UK authority responsible for licensing, regulating and influencing the UK oil and gas, offshore hydrogen and carbon storage industries.

We support UK energy security, drive emissions reduction from UK supplies of oil and gas and help to accelerate the transition to net zero to realise the potential of the North Sea as an integrated energy basin.

In this consultation, we are seeking views on the approach that we intend to adopt, and the type of information that we intend to publish, in respect of those that we regulate. We are also consulting on the public interest factors set out in **ANNEX B**, which we intend to apply to the NSTA decisions to publish the information contained in **ANNEX A**; we also propose to apply the public interest factors in **ANNEX B** to the publication of company specific information more generally.

This consultation sets out the background to the proposals and the reasons for them. In formulating these proposals, we have had regard to, among other things, the matters in section 8 of the Energy Act 2016.

Issued: 29 August 2024

Respond by: 31 October 2024

Territorial extent: United Kingdom and United Kingdom Continental Shelf

## **Responding to this consultation**

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The NSTA invites written views and comments on the proposals, to be made by 31 October 2024. Your response will be most useful if it is framed in direct response to the questions posed, though further comments and evidence are also welcomed.

Please submit your response by email or post.

The NSTA has produced a coversheet for responses submitted by email or post (**ANNEX E**) and asks that you complete and include it with your response, which should speed up the processing of responses, and help to maintain confidentiality where appropriate.

Written responses to the consultation should be sent to:

North Sea Transition Authority  
Sanctuary Buildings  
20 Great Smith Street  
London  
SW1P 3BT

Email: [transparency@nstauthority.co.uk](mailto:transparency@nstauthority.co.uk)

Representative groups are asked to give a summary of the persons or organisations they represent when they respond.

## Additional copies

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Other versions of the document in Braille, large print, audio or Welsh can be made available on request. Please contact us using the 'enquiries' details to request alternative versions.

## Confidentiality and data protection

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The NSTA will aim to publish a summary of the response to this consultation.

The NSTA does not intend to publish individual responses to this consultation. However, the NSTA is subject to the requirements of the Freedom of Information Act 2000 ("**FOIA**") and Environmental Information Regulations 2004 ("**the EIR**") so, if you think any part of your response should be kept confidential, please place such part(s) in a separate annex to your response and include your reasons why this part of your response should not be published. For example, this may include information such as your personal background and experience. Therefore, if you want your personal details to remain confidential, it would be helpful if you could please provide them in the coversheet only so that the NSTA does not have to edit your response.

If someone asks us to keep part or all of a response confidential, we will of course take this request into account, including when we are considering any requests under FOIA and the EIR or under other relevant legislation. Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to the NSTA to use for its regulatory remit.

## Quality assurance

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This consultation has been carried out in line with the [government's consultation principles](#).

If you have any complaints about the consultation process (as opposed to comments about the issues which are the subject of the consultation) please address them to:

NSTA Consultation Coordinator  
20 Great Smith Street  
London  
SW1P 3BT

Email:  
[nstaconsultationcoordinator@nstauthority.co.uk](mailto:nstaconsultationcoordinator@nstauthority.co.uk)

# Introduction

1. The NSTA licences, regulates and influences the oil, gas, carbon storage and hydrogen storage industries (the '**Industry**'). We help drive North Sea energy transition, realising the significant potential of the UK Continental Shelf ('**UKCS**') as a critical energy and carbon abatement resource. We hold industry to account on halving upstream emissions by 2030<sup>1</sup>.
2. As part of our Corporate Plan 2022 – 2027<sup>2</sup>, we set out our regulatory objectives which, amongst other things, aim to:
  - a. *Ensure effective and efficient asset stewardship at all stages of the oil and gas life cycle to optimize efficiency and ensure economic recovery and the drive to net zero carbon by 2050.*
  - b. *Promote timely and cost-effective decommissioning of assets to facilitate the energy transition and support value creation.*
  - c. *Measure and monitor UKCS atmospheric emissions to deliver as a minimum expectation the targets set out in the North Sea Transition Deal<sup>3</sup>.*
  - d. *Promote the transparency of emissions measurement and reporting, improving the accuracy of reported data and providing access to data and analysis.*
  - e. *Strengthen the ability of the UK offshore supply chain to further diversify into the specialist engineering manufacturing, services and technology sector to deliver the energy transition, and secure its position as a global supplier of expertise.*
  - f. *Support innovative partnering between oil and gas, renewables, hydrogen and carbon capture to accelerate energy transition and to support renewable energy production and hydrogen generation, transportation and storage.*
  - g. *Support continued investment in the UKCS to maximize contribution to energy security and as a bridge to a competitive UK renewables industry.*
  - h. *Deliver the NSTA Digital Strategy by supporting industry, academia and the supply chain to use digitalization to unlock the huge value from data, while providing excellent digital services to stakeholders.*
3. We use the tools in our regulatory framework to deliver these objectives. From time to time this may include the publication of information.
4. The NSTA receives and generates information about the sector as a whole, and about individual licensee performance and regulatory compliance.

<sup>1</sup> For more information on this, please see our website: North Sea Transition Authority ([nstaauthority.co.uk](https://nstaauthority.co.uk))

<sup>2</sup> <https://www.nstaauthority.co.uk/media/8166/corporate-plan-2022-final.pdf>

<sup>3</sup> The North Sea Transition Deal ([nstaauthority.co.uk](https://nstaauthority.co.uk))

We generally consider it appropriate to publish such information where it is in the public interest to do so.

5. This is because we consider there to be a fundamental principle that transparency of such information is desirable unless there is good reason *not* to publish it. Such visibility about the performance and regulatory compliance of those we regulate promotes confidence in the regulatory system. This is in both the public interest and the interest of those that comply with the NSTA's regulatory requirements.
6. In this consultation, we are seeking views on our proposed approach to the publication of information about those we regulate where that information is relevant to our regulation of the Industry. We are also seeking views on the public interest factors (set out in **ANNEX B**) that would apply when making publication decisions in respect of information specified in **ANNEX A** and also more broadly.
7. The intended effect of these proposals is to establish the NSTA's general policy approach to the publication of company specific information relating to a) investigations; and b) decommissioning obligations – and to provide greater transparency about the factors to which it would normally expect to have regard in making general company specific publication decisions.
8. We consider that these proposals are a necessary and proportionate way to ensure that we are publishing information about those we regulate where it is in the public interest to do so, and to do so in a way that is fair to those concerned.

# Proposals regarding publication

9. The NSTA has statutory powers to publish certain regulatory decisions, for example, a decision to impose a sanction notice where a person has breached a petroleum-related requirement.
  10. There are also circumstances in which the NSTA does not have *specific* statutory powers to publish certain information, but may do so, for example if it considers that there is a public interest in doing so. In reaching a decision to publish such information, we have regard to the matters in section 8 of the Energy Act 2016 in addition to other public interest factors.
  11. The table at **ANNEX A** sets out a list of company-specific information that we propose to publish, subject to this consultation. This list relates to the following defined categories:
    - a. **Enforcement Function:** information about a regulated person's compliance with an obligation, so that the NSTA will now provide company-specific information relating to the opening of an investigation and the giving of a sanction warning notice along with certain details of the investigation. The NSTA's Sanctions Procedure Guidance<sup>4</sup> would be amended accordingly, to reflect this change.
    - b. **Decommissioning Information:** information relating to the decommissioning obligations of specific regulated persons.
  12. In proposing the publication of the information in **ANNEX A**, we have considered and balanced the public interest factors set out in **ANNEX B**. In reference to the matters in section 8 of the Energy Act 2016, we consider the need to maintain a stable and predictable system of regulation which encourages investment to be directly relevant, as well as working collaboratively with Industry.
  13. We would normally expect to publish the information described in the table at **ANNEX A** unless we decide to make an exception based on our consideration of any relevant factors, including the factors set out in **ANNEX B**.
  14. We see transparency as an ongoing approach at the NSTA. As such, we will keep the list of information we expect to publish under review, with the aim of increasing transparency into other areas where this supports our regulatory objectives and is in the public interest.
- Subject to this consultation, our proposed new approach to publicising our investigations will apply to all our investigations including those that are ongoing when we introduce the new policy.

<sup>4</sup> Sanction Procedure (nstauthority.co.uk)

## Reasons for our proposals

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15. Our general view is that it is necessary for the NSTA to publish information about our regulatory decisions and the regulated persons they relate to. This is important because, as a regulator, we consider there to be a fundamental principle that transparency of such information about regulation and decision-making is desirable unless there is good reason *not* to publish it.
16. Transparency can provide a means to facilitate the exercise of our statutory functions and deliver on the aims in our corporate strategy, particularly those in respect of decommissioning, the reduction of emissions and strengthening the supply chain. We explain this further below.
17. We will not disclose information that is protected from disclosure under the NSTA's regulatory framework (for example, under section 61 of the 2016 Energy Act) unless it is appropriate to do so under that framework, for example, under the Oil and Gas Authority (Offshore Petroleum) (Disclosure of Protected Material after Specified Period) Regulations 2018.

## Information in respect of our Enforcement Functions

18. We consider that there is a public interest in transparency in respect of enforcement functions.
19. Publishing timely information can help to facilitate the NSTA's enforcement functions and regulatory objectives by, among other things:
  - a. Encouraging persons to come forward with information that can assist the NSTA's investigations.
  - b. Enhancing regulated persons' and the public's understanding of when the NSTA does, and does not, consider it appropriate to take enforcement action.
  - c. Keeping the public informed of the progress of a case, including making clear when a regulated person is not under investigation. Further transparency can also address public concern or speculation, including by correcting information already in the public domain.
  - d. Developing public and investor confidence in the UKCS by demonstrating how the NSTA is acting to ensure that regulatory obligations are complied with.
  - e. Contributing to achieving due process as the NSTA's processes will be transparent, provides reassurance that we are taking appropriate action, and ensures that parties directly involved in a case are treated fairly.
  - f. Deter future non-compliance of regulatory obligations.



20. The published NSTA disputes and sanctions case register<sup>5</sup> currently identifies when we have opened a case and the focus of that investigation. However, we do not currently publish additional information about the investigations that we have opened and their progress, and we do not identify which company is the subject of that investigation, unless and until the investigation results in the imposition of a sanction notice.
21. Often, by the time a final outcome has been reached in an enforcement case, the benefit to the sector of publishing our decision and the reasons for it may be less marked than if more information about the investigation had been published earlier.
22. For this reason, we consider that there is a strong public interest in the publication of more detailed information at an earlier stage in an investigation. Publishing the additional information in respect of live investigations signals to regulated persons the issues that are of concern to the NSTA. This in turn will encourage good practice and compliance with regulatory requirements and, in consequence, will support the social licence to operate of those we regulate. Transparency at an earlier stage in an investigation could also encourage witnesses and whistleblowers to come forward which could assist in an investigation.
23. Publication also demonstrates to the public and those persons that are compliant that action is being taken to address potential non-compliance. This in turn promotes confidence in the regulatory system, and a stable and predictable system of regulation which encourages investment in the UKCS.
24. We therefore propose publishing the name of any regulated person under investigation and high-level details of the alleged breach which is set out in **Table 1** of **ANNEX A** below, where it is in the public interest to do so, and where there are no compelling legal or other reasons not to do so.
25. We also propose to publish more information where the NSTA has made a decision to issue a Sanction Warning Notice, including the name of the regulated person being investigated and a summary of the alleged breach. We note however that different considerations are likely to apply where the intention would be to name a particular individual and we would likely approach that on a case-by-case basis having regard to applicable legal requirements, for example, any restrictions in relevant data protection law.
26. While we consider that there is a strong public interest factor in regulated persons visibly being held to account in respect of their regulatory obligations, we recognise that a decision to publish information at this stage in an investigation will need to be carefully balanced against any material impact to the commercial and/or reputational interests of the company concerned.

<sup>5</sup> NSTA Case Register

27. If the NSTA were to publish such information, the NSTA would make clear that the opening of an investigation into a regulated person should not be read as the NSTA having taken a view on the substance of that investigation or as to that regulated person's responsibility for the alleged breach of a regulatory requirement. Final decisions on breach are taken following a full investigation, including an opportunity for the regulated person concerned to provide representations to the NSTA in respect of the alleged breach. We will also announce publicly when we have decided that no further action should be taken.
28. Where appropriate, the NSTA will provide regulated persons with sight of the information we intend to publish and an opportunity to comment prior to publication.

### ***Information in respect of our Decommissioning Functions***

32. Decommissioning presents a significant challenge to the sector, noting in particular the substantial shortfall in the number of inactive wells that have been successfully decommissioned to date, relative to the extent of decommissioning that regulated persons with decommissioning obligations had planned. (Licensees are expected to fulfil their decommissioning obligations under

### **Consideration of alternative proposal**

29. In preparing this consultation document, the NSTA also considered as an alternative proposal, the publication of a decision to place a regulated person into Enhanced Facilitation.
30. Where the NSTA identifies a risk of non-compliance or it considers that a breach has already occurred, it normally applies its measured escalation policy. Under this approach, the NSTA will seek to steward the regulated person concerned back to compliance through "Facilitation", or "Enhanced Facilitation" where the NSTA's concerns are more serious.
31. However, we consider that the Enhanced Facilitation process provides the final opportunity for a regulated person to resolve any areas of dispute before the matter is then referred to the Dispute and Sanctions team in the NSTA and a formal investigation may be opened. In view of this split, we have decided not to take this forward as a proposal.

their licences including the remediation of the marine environment).

33. The NSTA aims to ensure that decommissioning is carried out cost effectively in accordance with regulatory requirements and in a manner consistent with the OGA Strategy, which includes, as part of the Central Obligation, assisting Government in meeting the net zero target<sup>6</sup>.

<sup>6</sup> See also the Supporting Obligations in [The OGA Strategy](#).

34. To deliver on this aim, the NSTA's Decommissioning Strategy<sup>7</sup> focuses on the following four priorities:

- **Planning for decommissioning:** driving cost efficiency through effective late-life stewardship, creating a platform for timely delivery.
- **Commercial transformation:** improving market efficiency, establishing a competitive and sustainable market.
- **Supporting energy transition from late life into decommissioning:** reducing greenhouse gas emissions on opportunities to reuse or re-purpose infrastructure.
- **Technology, processes and guidance:** the development and deployment of technology, appropriate regulatory processes and clear guidance underpin delivery of the Strategy.

35. We consider that effective, efficient, and planned asset stewardship in addition to operators working collaboratively with a sustainable and competitive supply chain are key to delivering the effective decommissioning of the UKCS.

### Regulatory compliance

36. The model clauses associated with the licenses granted by the NSTA set out various obligations in relation to the plugging and abandonment of any wells drilled pursuant to an offshore licence. While the specific obligations may vary depending on the applicable model clauses, the effect is that all licensees are

required to plug and abandon any wells drilled before the expiry or surrender of their licence, and sometimes earlier.

37. There are also obligations that require licensees to obtain consent from the NSTA before they abandon and/or plug and abandon a well. Licensees are also required to carry out any plug and abandon work in accordance with a specification approved by the NSTA.
38. The OGA Strategy sets out a Central obligation and Supporting obligations, describing the actions and behaviours required to support the delivery of cost-efficient decommissioning and re-purposing or reusing infrastructure including support for carbon storage and offshore hydrogen projects.
39. In addition, the NSTA has, through its Decommissioning Strategy and published guidance, set out its decommissioning expectations. These explain what is required of infrastructure owners; and how the NSTA will engage through a Tier Review process using performance dashboards, supporting knowledge sharing and driving improvements in cost efficient planning.
40. We consider that greater transparency about companies' decommissioning obligations will assist in ensuring general public transparency with the decommissioning conditions stated in licences. Not only will this greater transparency apply pressure on the company named in any publication to meet their regulatory obligations;

<sup>7</sup> Decommissioning Strategy

publication will also signal to other regulated persons the issues and areas of priority to the NSTA, which will in turn drive greater awareness within the public and industry. This will promote a stable and predictable system of regulation which encourages investment in relevant activities - including increased visibility and certainty of work to the supply chain, which is crucial in the effective delivery of the NSTA's decommissioning expectations.

41. In addition to the NSTA, the Health and Safety Executive, Offshore Petroleum Regulator for Environment and Decommissioning and the Scottish Environment Protection Agency have a role in the effective decommissioning of offshore infrastructure, including offshore wells. Greater transparency in respect of the requirements of those regulated by the NSTA will also assist those organisations listed above to understand areas of concern, which in turn can assist with the appropriate exercise of their functions.
42. We consider that, publishing a table of licensee performance in respect of their stated decommissioning obligations, would be an effective and accessible means of providing transparency in this area. This would enable regulated persons and the public to see which licensees have outstanding decommissioning obligations and how these rank against other licensees.

43. We propose that, any information we publish in respect of the decommissioning obligations of those we regulate will be kept factual and will not be accompanied by additional analysis of whether that regulated person has breached an obligation.

### The supply chain

44. With limited resources available, it is important that those who operate in the supply chain have knowledge of upcoming decommissioning projects in order to prepare, bid and deliver on such upcoming projects. Greater transparency in respect of upcoming decommissioning projects will enable the supply chain to assist in the effective delivery of decommissioning programmes.
45. The NSTA's Pathfinder Platform<sup>8</sup> and Decom Data Visibility Dashboard<sup>9</sup> already provide some information in respect of upcoming decommissioning projects. However, operators are not currently obliged to upload information on to the Pathfinder Platform, which risks an incomplete picture of upcoming opportunities for those operating in the supply chain.

<sup>8</sup> Energy Pathfinder ([nstauthority.co.uk](http://nstauthority.co.uk))

<sup>9</sup> Decommissioning data visibility dashboard ([nstauthority.co.uk](http://nstauthority.co.uk))

46. We consider that further transparency in respect of upcoming decommissioning projects (i.e. wells that will require decommissioning in the future) would assist the supply chain to better plan, as set out in the table at **ANNEX A**. This could also include taking steps to ensure a more complete data set on the Pathfinder Platform and/or the Decom Data Visibility Dashboard.
47. We propose that any information we publish in respect of what the decommissioning obligations are of those we regulate will be a summary of those obligations. Where appropriate, the NSTA will provide regulated persons with sight of the information we intend to publish and an opportunity to comment prior to publication.

### ***Application of the proposed public interest factors to information not specified in ANNEX A***

48. We will continue to look for areas where further transparency can complement the delivery of our regulatory functions. As a result, we expect to publish wider types of information not specified in **ANNEX A** where we consider that it will help to deliver our regulatory functions and it is in the public interest to do so.
49. This means that we will not consult in all cases where we publish information and we propose that in such cases we will apply the public interest factors in **ANNEX B** in addition to any other public interest factors we consider relevant to the decision to publish such information.

# Proposed implementation

50. Subject to the representations received as a result of this consultation, we intend to make a decision in Spring 2025 and to implement any resulting approach at that point.

## ANNEX A – Proposed information that we expect to publish

1. Our proposal is that we would normally expect to publish the information on the subject matter set out in **Table 1**.
2. In relation to the subject matter in **Table 1**, we propose to consider the factors set out in **ANNEX B** in our consideration of:
  - (a) Whether to make an exception to our proposed general policy to publish information about a particular subject matter.
  - (b) What information relating to a particular subject matter will be included in a publication, in particular, whether to publish some or all of the related or ancillary material listed in **Table 1**.

**Table 1: Information that the NSTA would expect to publish**

ENFORCEMENT FUNCTION				
	Main subject matter	Main content in respect of that subject matter	Any related or ancillary material	Frequency and format
1.	A decision to open an investigation into a breach of a petroleum-related requirement.	Name of operator.  Details of the regulatory requirement / petroleum-related requirement the investigation relates to.  A summary of the suspected breach being investigated.	The NSTA's powers.  Area of the North Sea concerned.  Date investigation opened.  Status of the investigation.  Stage of the investigation.  Accompanying press statement.	Published on the Disputes and Sanctions section of the NSTA's website following the decision to open an investigation.
2.	A decision to issue a Sanction Warning Notice.	Name of operator/licensee.  Details of the NSTA's case in respect of the alleged breach of a petroleum-related requirement.	The NSTA's powers.  Area of the North Sea concerned.  Accompanying press statement.	Published on the Disputes and Sanctions section of the NSTA's website following the NSTA Board's decision to issue a Sanction Warning Notice.

DECOMMISSIONING INFORMATION				
	Main subject matter	Main content in respect of that subject matter	Any related or ancillary material	Frequency and format
3.	Well Operations Notification System (“ <b>WONS</b> ”) metrics:  a. All inactive wells that require decommissioning.  b. Wells with expired well decommissioning deadlines/no NSTA approved decommissioning deadline.	Name of operator.  The licence number.  Location of wells including a numerical identifier.  Number of wells that require decommissioning.  Current well decommissioning deadline date of each well (i.e. from WONS or instruments issued under the licence such as a P&A notice and Deeds of Variation).  <b>This would not include specific technical well data.</b>	Accompanying press statement.	Published on the Decommissioning section of the NSTA's website.  Updated at least annually.
4.	Table specifying the progress relevant regulated persons have made in respect of their decommissioning obligations.	Name of operator.  Number of wells that require decommissioning.  Number of wells that are past well decommissioning deadline date or do not align with NSTA guidance relating to well decommissioning timing (UKCS Well Applications and Consents Guide).  Historical data of operator fulfilment of its decommissioning obligations.	Accompanying press statement.	Published on the Decommissioning section of the NSTA's website.  Updated at least annually.



# ANNEX B – Proposed public interest factors considered in respect of publication of information<sup>10</sup>

## a. The public interest

### *Factors in favour of publication:*

- i. There is a general public interest in regulators being transparent about the actions they have taken in respect of those they regulate.
- ii. Publication may enable the NSTA to regulate in a way that is more proportionate and cost effective. This is because the publication of our enforcement actions can be a less resource intensive means of encouraging compliance amongst other operators.
- iii. Greater awareness amongst public and operators in respect of decommissioning obligations will likely lead to operators fulfilling those obligations. This in turn will mitigate the extent to which those obligations will need to be fulfilled by recourse to public funds.
- iv. Publication may encourage third parties to come forward to provide information about an operator that supports the NSTA's regulatory functions, for example, an investigation into a potential breach of a petroleum-related requirement.

### *Factors against publication:*

- v. Specific details may be protected from disclosure under relevant legislation or licence.
- vi. Specific details may be considered commercially sensitive and/or publication could give rise to competition law concerns.
- vii. Publication of specific details may limit the NSTA's ability to perform its functions effectively, for example, by reducing the likelihood of operators reporting regulatory risk if they know that they are likely to be identified as being the subject of an investigation.
- viii. In some cases there may be a risk that publishing details could compromise confidential sources of information and evidence about potential wrongdoing, for example, where there is a risk of evidence being destroyed or lost.
- ix. In some cases there may be a risk that publishing information could prejudice investigatory or compliance activities of the NSTA or other enforcement bodies, for example, where the content and timing of publication could lead to evidence being concealed or destroyed.

<sup>10</sup> For Operator, also read Licensee where appropriate.

## **b. The sector/operator interest**

### *Factors in favour of publication:*

- i. Publication signals to other operators the issues that are of concern to the NSTA and that, in turn, will encourage compliance with regulatory requirements and thereby support operators' social licence to operate.
- ii. Publication demonstrates to operators that are compliant that action is taken to address non-compliance. This in turn promotes a stable and predictable system of regulation which encourages investment in the UK Continental Shelf.
- iii. Transparency of upcoming projects (e.g. decommissioning of wells) in the UKCS enables supply chain companies to better prepare, bid and deliver on projects. This in turn is likely to better competition and lead to cost efficiencies for operators.
- iv. Publication of decisions and reasons for those decisions demonstrates to the supply chain that operators will be held to account in respect of their licence obligations, for example, the decommissioning of wells.

### *Factors against publication:*

- v. Publishing information at too early stage may disproportionately impact on an operator's commercial/reputational interests at that time.
- vi. Publication may damage an operator's commercial interests if it generates adverse publicity and/or would create a competitive advantage for other operators.

# ANNEX C – Consultation questions and next steps

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**Q1. Q1. Do you have any comments about the proposals to publish the information in ANNEX A?**

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**Q2. Do you have any comments about the public interest factors set out in ANNEX B? Are there any additional public interest and/or operator/sector interest factors that you consider we should or should not take into account?**

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**Q3. Do you have any comments about the application of the public interest factors to the wider publication of information not specified in ANNEX A?**

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**Q4. Do you have any comments about any unintended consequences of the proposals set out in this consultation?**

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**Q5. Do you have any other comments on the issues raised in this consultation?**

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## **Next steps**


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This consultation closes on the 31 October 2024. The NSTA will consider the feedback received and aims to publish a response to this consultation.

# ANNEX D – Regulatory Impact Assessment and Equality Impact Assessment

1. The intended effect of the proposals in this consultation is to establish the NSTA's general policy approach to the publication of company specific information and to provide greater transparency about the types of information the NSTA would be likely to publish and the factors to which it would normally expect to have regard to in making publication decisions.
2. The table at **ANNEX A** sets out a list of company-specific information that we propose to publish unless there are good reasons not to, subject to this consultation. This includes information relating to the opening of an investigation and the giving of a sanction warning notice.
3. We also propose publishing information in respect of operators' decommissioning obligations in relation to specific wells.
4. We consider that these proposals are a necessary and proportionate way to ensure that we are publishing information about operators where it is in the public interest, and to do so in a way that is fair to those concerned.
5. **The consultation seeks views and evidence on the potential impacts (costs and benefits) to business and wider society of the proposals.**
6. In making these proposals, the NSTA has had regard to the desirability of promoting economic growth, and has applied an understanding of the business environment such that the proposals set out are proportionate to the aims to be achieved.
7. The NSTA has a general duty under the Equality Act 2010 in carrying out its functions to have due regard to the need to:
  - eliminate unlawful discrimination, harassment and victimisation;
  - advance equality of opportunity between different groups; and,
  - foster good relations between different groups.
8. Further details can be found at: <https://www.equalityhumanrights.com/equality/equality-act-2010>
9. We have considered whether the proposals in this consultation would have an adverse impact on persons with protected characteristics. Our assessment is that, given the corporate nature of licensees and operators, it is not anticipated that there would be such an impact.
10. If any reader of this consultation document thinks that the proposals in this consultation will have an adverse impact on persons with protected characteristics, please respond to the consultation with as much detail as possible.

# ANNEX E – Response coversheet

 North Sea Transition Authority	<b>CONSULTATION ON THE PUBLICATION OF COMPANY SPECIFIC INFORMATION</b>						
To: transparency@nstauthority.co.uk							
<p><b>YOUR DETAILS</b></p> Name: Company/Organisation: Position: E-mail address: Address: Representing:							
<p><b>CONFIDENTIALITY</b></p> Please tick below if you consider any part of your response is confidential, giving your reasons why: <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Nothing <input type="checkbox"/></td> <td style="width: 50%;">Name/contact details/position <input type="checkbox"/></td> </tr> <tr> <td>Whole response <input type="checkbox"/></td> <td>Company/organisation <input type="checkbox"/></td> </tr> <tr> <td>Part of the response <input type="checkbox"/></td> <td></td> </tr> </table> <p>If there is no separate annex, which parts?</p>		Nothing <input type="checkbox"/>	Name/contact details/position <input type="checkbox"/>	Whole response <input type="checkbox"/>	Company/organisation <input type="checkbox"/>	Part of the response <input type="checkbox"/>	
Nothing <input type="checkbox"/>	Name/contact details/position <input type="checkbox"/>						
Whole response <input type="checkbox"/>	Company/organisation <input type="checkbox"/>						
Part of the response <input type="checkbox"/>							
<p>If you want any part of your response, your name or your organisation to be kept confidential, can the OGA still publish a reference to the contents of your response including (for any confidential parts) a general summary that does not disclose the specific information or enable you to be identified?</p> <p style="text-align: center;">YES <input type="checkbox"/> NO <input type="checkbox"/></p>							
<p><b>DECLARATION</b></p> <p>I confirm that the correspondence supplied with this coversheet is a formal consultation response that the NSTA can publish, except as indicated above.</p> <p>However, in supplying this response, I understand that the NSTA may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations.</p> <p>If I have sent my response by email, the NSTA can disregard any standard e-mail text about not disclosing email contents and attachments.</p> <p>Name:</p> <p>Signed (if hard copy): _____</p>							



North Sea Transition Authority

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