



North Sea
Transition
Authority

Stakeholder engagement

Carbon Storage Stewardship Expectation 5

September 2025

1. Expectation

The North Sea Transition Authority ('NSTA') expects that Carbon Dioxide Appraisal and Storage Licence ('CS Licence') holders will engage with all relevant stakeholders at appropriate times and promote a culture of collaboration with other users¹ and uses² of the sea.

This means CS Licence holders should:

- 1.1 Ensure senior leaders are committed to stakeholder engagement,
- 1.2 Proactively identify parties that might be affected by appraisal or subsequent development and operational activities that will take place under a CS Licence,
- 1.3 Consult in a timely manner with parties that might be affected by appraisal or subsequent development and operational activities under a CS Licence, and
- 1.4 Collaborate with other stakeholders beyond the immediate requirements to recognise common interest.

2. Reason for the Expectation

- 2.1 There is a robust regulatory framework in the UK relating to carbon capture and storage ('CCS') including legislation under which the NSTA operates in its role as the licensing and permitting authority for offshore carbon storage. This Expectation supports the NSTA's regulatory role in respect of carbon storage, as established by the Energy Act 2008¹, Energy Act 2023² and further elaborated by secondary legislation, including The Storage of Carbon Dioxide (Licensing, etc) Regulations 2010³ (the '**Storage Regulations**'), and assists CS Licence holders to fulfil their obligations.
- 2.2 One of the considerations in whether to grant a storage permit is the assessment of the potential for undue interference with uses of the area surrounding the proposed storage site, as set out in Regulation 8(f) of the Storage Regulations. Stakeholder engagement is one of the main ways for CS Licence holders to address this.
- 2.3 The NSTA considers that co-location of different energy technologies is possible and actively works with others to drive a co-ordinated approach to managing the seabed and associated marine activities. This is critical as offshore space becomes increasingly busy. Effective stakeholder engagement practices will aid CS Licence holders in:

- i. Managing co-location challenges that may arise from the need to maximise use of the seabed
- ii. Ensuring issues are identified early and can be resolved efficiently to reduce project risks
- iii. Promoting proactive collaboration between stakeholders to support multiple activities and encourage wider integration in support of the energy transition, and
- iv. Promoting continuous improvement of activities and sharing these lessons both internally and externally

2.4 Stakeholder engagement is critical to project success and should be central to project management:

- i. Failure to identify and engage stakeholders at an early stage of a project may result in delay or recycle and additional cost
- ii. Stakeholder engagement helps ensure issues are identified in a timely manner and resolved efficiently, reducing risks to project delivery
- iii. Stakeholder engagement is critical particularly where a project interacts with infrastructure that is not directly owned by the CS Licence holder or where the CS Licence holder is part of a larger venture that owns the infrastructure. For example, early engagement on matters including, but not limited to, the following can help mitigate potentially significant delays to a project:
 - direct early engagement over pipelines, their re-use or access for inspection,
 - access to well data to progress early risk assessments for well integrity,
 - ownership transfers of infrastructure, or
 - other matters on the critical path for project execution

2.5 As part of stakeholder engagement, CS Licence holders should share best practices and case histories with wider industry, through industry forums or papers as appropriate, to promote a culture of collaboration, effective stakeholder engagement and sharing of lessons learned.

2.6 Petroleum licence holders and other relevant persons have obligations in relation to CCS projects. CS Licence holders are expected to engage with petroleum licence holders to support them in executing the petroleum licence holders' obligations.

3. Delivering the Expectation

A. Stakeholder Identification

- A.1 It is expected that key stakeholders should start to be identified at the CS licence application stage, in order to submit a Stakeholder Engagement Plan ('**SEP**') as part of the CS licence application submission as set out in the NSTA's published guidance⁵.
- A.2 CS Licence holders are expected to include as stakeholders any interested parties that might have an interest in, or may be affected by, the proposed appraisal activities and any subsequent development or operational activities under any storage permit (if granted).
- A.3 Early attention should be given to potential users and uses of the area – the UK offshore space is a competed resource with both ongoing and rapidly developing activity that includes petroleum decommissioning, installation of transmission infrastructure, licensing for wind farms, extraction, fishing etc.
- A.4 The NSTA acknowledges that levels of stakeholder engagement will vary depending on where a project is in its lifecycle. However, projects should identify and engage with stakeholders as early as practicable to identify any issues that might need to be addressed.
- A.5 Stakeholders to consider may include, but not be limited to:
- Organisations from whom licences, consents, permits may be required
 - Transport and storage developers
 - Stakeholders critical for the commercial success of the project
 - Supply chain
 - Statutory consultees
 - Other users of the sea/seabed
 - Local communities
- A.6 New stakeholders may be identified as a project matures. As the CS licence holder identifies new interested parties, they should be added to the SEP. In cases where significant new stakeholders are identified, the NSTA should also be informed.

B: Stakeholder analysis

- B.1 Stakeholder analysis is a critical part of project delivery and should follow an established and well-defined process. The CS Licence holder should identify an appropriate method of stakeholder mapping for the project.
- B.2 The CS licence holder should aim to understand the needs, interests, concerns and expectations of stakeholders so they can proactively address issues or be prepared for them as they arise through future engagements.

- B.3 The CS licence holder is expected to understand the relative importance and potential impact to the project of each stakeholder. CS Licence holders should consider categorising stakeholders according to their level of influence on the project.
- B.4 Consideration should be given to prioritising engagement with infrastructure owners.
- B.5 An engagement strategy should seek to understand at what level and at what time each stakeholder might optimally be engaged and how each engagement addresses project risks.

C: Stakeholder Engagement Plan

- C.1 CS Licence holders should be able to demonstrate, among other things, a prioritised engagement strategy informed by appropriate analysis.
- C.2 As a project moves into areas of activity that require permits, licences, authorisations, notifications and consents, the CS Licence holder might consider use of a compliance management solution to manage time-critical regulatory engagements and requirements.
- C.3 The NSTA expects CS Licence holders to demonstrate their plan of engagement including key milestones, deliverables, mitigations and appropriate escalation points. CS Licence holders should also be able to demonstrate that it meets the requirements in the NSTA's published guidance.
- C.4 In general, CS Licence holders should maintain the SEP as a live document. While it should be updated in line with the NSTA's published Guidance⁶, the need for updates may also occur:
 - to record engagements with new stakeholders or interested parties as they arise,
 - where a significant event or material change to the project occurs
- C.5 While routine updates should be shared with the NSTA, CS Licence holders should also share any non-routine updates as noted in C.4.
- C.6 CS Licence holders are encouraged to regularly review the status of any commercial matters that may have an impact on the timely delivery of a storage permit application (see also the relevant paragraphs regarding Commercial and other Conditionality in the NSTA's guidance⁵).

4. Demonstrating Delivery

Information obtained from various sources and engagements between the NSTA and CS Licence holders will help inform the NSTA of the extent to which they may be delivering against this Expectation. These may include, but not be limited to:

4.1 Reporting

The NSTA collects a range of data from CS Licence holders as part of the annual reporting in accordance with paragraph 3 of schedule 2 of the Storage Regulations³ and may request additional information or reports (for example using the powers in s112 of the Energy Act 2023²). Information may be collected in accordance with any applicable regulations or guidance.

4.2 Stewardship Engagement Meetings

The NSTA will engage with CS Licence holders during the lifecycle of a project. For any meeting, the NSTA may suggest an agenda to focus on issues that present the greatest stewardship impact, and the agenda will be based on data received, any applicable benchmarking, and delivery against this Expectation.

4.3 Meeting of Licence commitments and Permit conditions

CS Licence holders are required to meet their licence commitments (including delivery of work programme commitments) and any conditions in a storage permit). Many of these commitments will require proactive stakeholder engagement. Where the NSTA considers that stakeholder engagement is critical to the delivery of a licence commitment, the NSTA will expect that stakeholder engagement plans are tailored to take this into account. If the NSTA does not consider sufficient progress is being made, it may engage with the relevant parties to understand the situation.

4.4 Sharing with Industry

CS Licence holders are encouraged to share examples of best practice and lessons learned with Industry, through active participation at forums such as conferences, industry-convened workgroups, taskforces, and publications such as academic journals. The NSTA may, on occasion, convene or co-convene events and participation is strongly encouraged to demonstrate delivery against this Expectation.

5. References

- 1 *Energy Act 2008*
- 2 *Energy Act 2023*
- 3 *The Storage of Carbon Dioxide (Licensing, etc) Regulations 2010*
- 4 [Guidance on the application for a Carbon Dioxide Appraisal and Storage Licence](#)
- 5 [Guidance on Applications for a Carbon Storage Permit](#)

