



North Sea
Transition
Authority

General policy approach to the publication of company specific information

Introduction

1. The NSTA licences, regulates and influences the UK oil, gas, offshore hydrogen and carbon storage industries (the '**Industry**'). We help to drive North Sea energy transition, realising the significant potential of the UK Continental Shelf ('**UKCS**') as a critical energy and carbon abatement resource.
2. The NSTA receives and generates information about individual licensee performance and regulatory compliance. We generally consider it appropriate to publish such information where it is in the public interest to do so.
3. This document sets out our general policy approach to the publication of company specific information. It sets out the information that we would normally expect to publish and the factors to which we will normally have regard to in making such publication decisions.
4. The NSTA retains the discretion to depart from this general policy on publication on a case-by-case basis where appropriate, having regard to relevant factors.

Information that we expect to publish

1. 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 will normally consider the factors set out later in this document, in our consideration of:
 - a. Whether to make an exception to our 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.	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 Investigations and Enforcement 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 regulatory requirement / petroleum-related requirement the investigation relates to.	The NSTA's powers. Area of the North Sea concerned. Accompanying press statement.	Published on the Investigations and Enforcement section of 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 (“ WONS ”) metrics: a. All inactive wells that require decommissioning. b. Wells with expired well decommissioning deadlines/no NSTA approved decommissioning deadline.	<p>Name of operator.</p> <p>The licence number.</p> <p>Location of wells including a numerical identifier.</p> <p>Number of wells that require decommissioning.</p> <p>The status of the well in respect of whether there is a valid WONS consent or valid and complete application.</p> <p>This would not include specific technical well data.</p>	Accompanying press statement.	<p>Published on the Decommissioning section of the NSTA’s website.</p> <p>Updated at least annually.</p>
4.	Table specifying the progress relevant regulated persons have made in respect of their decommissioning obligations.	<p>Name of operator.</p> <p>Number of wells that require decommissioning.</p> <p>The status of the well in respect of whether there is a valid WONS consent or valid and complete application.</p>	Accompanying press statement.	<p>Published on the Decommissioning section of the NSTA’s website.</p> <p>Updated at least annually.</p>

Public interest factors considered in respect of publication of information¹

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.

¹For 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 facilitate 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.

