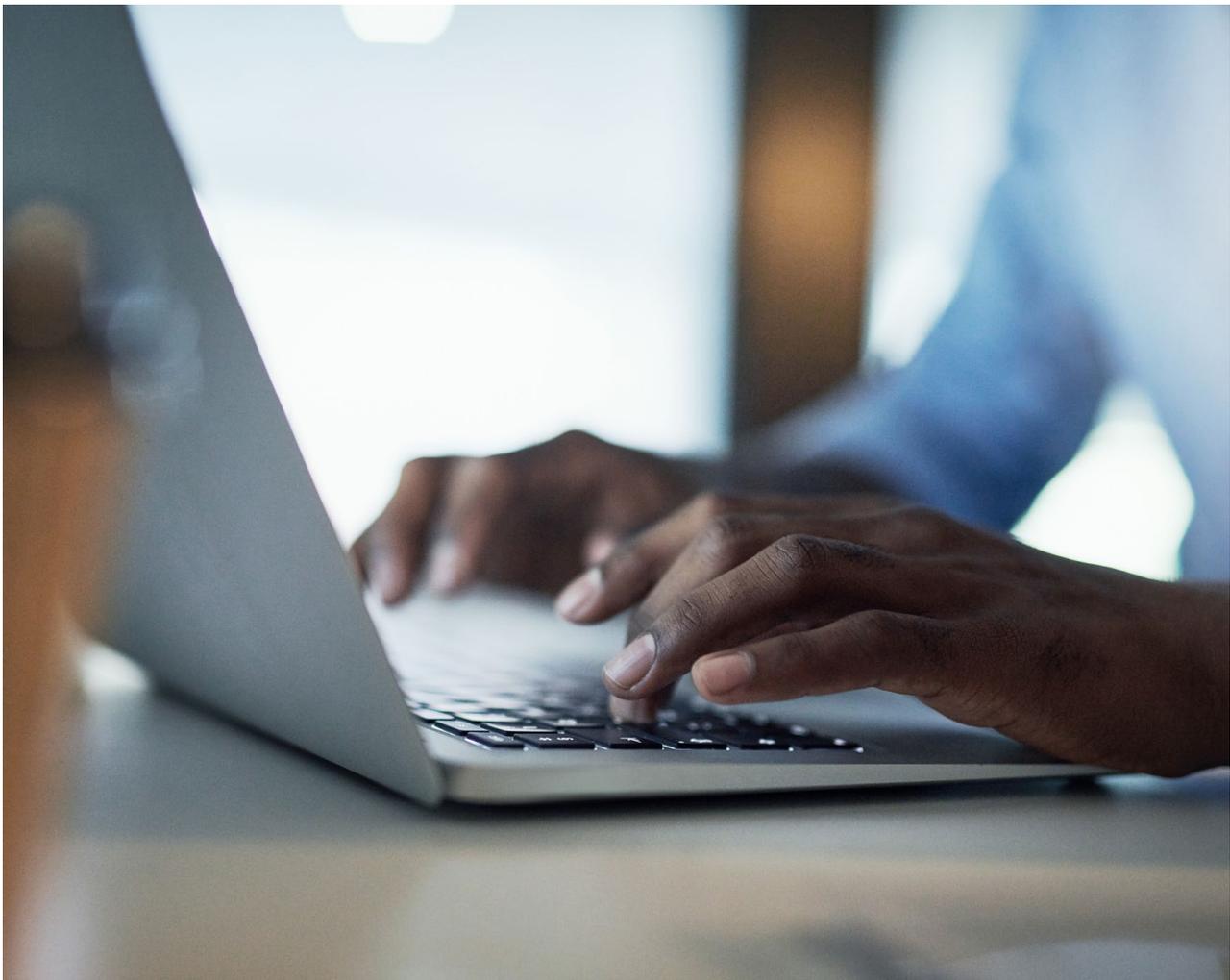


HSE response to consultation on Carbon Capture Utilisation and Storage and Offshore hydrogen production

February 2026



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Introduction

1. The UK Government is supporting the development of industrial clusters co-locating high energy industries with Carbon Capture Usage and Storage ('CCUS') projects, and both on and offshore hydrogen production. This includes the announcement of £21.7bn of funding for two CCUS clusters, and the Hydrogen Allocation Rounds programme¹, which allocates support for non-CCUS enabled hydrogen production. The Health and Safety Executive (HSE) has been working with the Department for Energy Security and Net Zero² to identify what health and safety regulations currently apply, and any potential issues that need to be addressed to support these industries in developing safely.
2. HSE's regulatory regime is underpinned by the Health and Safety at Work etc. Act 1974³ ('HSWA'), which places a fundamental general duty on employers to ensure, so far as is reasonably practicable, the health, safety and welfare at work of their employees, and of other people who may be affected by the work activity. HSWA is supported by topic and sector specific secondary legislation including regulations applying to major hazard sectors. 'Major hazards' is a general term applied to industries that have the potential to cause catastrophic harm to people or the environment in the event of an accident.
3. Existing regulations concerning offshore activities and the transport of dangerous fluids in pipelines were written primarily for the regulation of hydrocarbons (such as crude oil, petroleum, and natural gas) and, as such, do not fully, clearly, or consistently apply to proposed CCUS operations or offshore hydrogen production. This limits HSE's ability to ensure appropriate safety standards and control measures are adopted as these projects develop, and also potentially leads to an uneven regulatory landscape for prospective dutyholders.

¹ Hydrogen Allocation Rounds - <https://www.gov.uk/government/collections/hydrogen-allocation-rounds>

² Department for Energy Security and Net Zero - <https://www.gov.uk/government/organisations/department-for-energy-security-and-net-zero>

³ Health and Safety at Work etc. Act 1974 - <https://www.legislation.gov.uk/ukpga/1974/37/contents>

Purpose of consultation and proposals

4. HSE's overall proposal during consultation was to amend existing health and safety regulations concerning offshore activities and the transport of dangerous fluids in pipelines to apply to CCUS operations offshore and in pipelines, and to offshore hydrogen production. This is because HSE considers that industries and technologies which involve CCUS operations and offshore hydrogen production have the potential to cause significant damage to people or the environment and should therefore be regulated as major hazard risks. The regulations that would require changes are:
 - The Pipeline Safety Regulations 1996⁴ ('PSR')
 - The Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995⁵ ('MAR95')
 - The Offshore Installations and Wells (Design and Construction, etc.) Regulations 1996⁶ ('DCR96')
 - The Offshore Installations (Offshore Safety Directive) (Safety Case etc) Regulations 2015⁷ ('SCR15')
 - The Offshore Installations (Prevention of Fire and Explosion, and Emergency Response) Regulations 1995⁸ ('PFEER95')
5. The consultation sought views on whether the proposals were appropriate to the hazards associated with the CCUS and offshore hydrogen production industries, and also on whether the estimates of costs to industry for compliance with new regulatory requirements were broadly correct.
6. The consultation also proposed to make a variation to the Health and Safety at Work etc. Act 1974 (Application outside Great Britain) Order 2013⁹ (AOGBO) to apply HSE jurisdiction to offshore CCUS activities involving CO₂ in all chemical phases, and offshore hydrogen production.

⁴ The Pipeline Safety Regulations 1996 - <https://www.legislation.gov.uk/ukSI/1996/825/contents>

⁵ The Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995 - <https://www.legislation.gov.uk/ukSI/1995/738/contents/made>

⁶ The Offshore Installations and Wells (Design and Construction, etc.) Regulations 1996 - <https://www.legislation.gov.uk/ukSI/1996/913/contents>

⁷ The Offshore Installations (Offshore Safety Directive) (Safety Case etc.) Regulations 2015 - <https://www.legislation.gov.uk/ukSI/2015/398/contents/made>

⁸ The Offshore Installations (Prevention of Fire and Explosion, and Emergency Response) Regulations 1995 - <https://www.legislation.gov.uk/ukSI/1995/743/contents/made>

⁹ The Health and Safety at Work etc. Act 1974 (Application outside Great Britain) Order 2013 - <https://www.legislation.gov.uk/ukSI/2013/240/contents/made>

7. A proposal was also made to extend the existing requirement for dutyholders to provide transport, accommodation, and subsistence to HSE inspectors carrying out regulatory activity at offshore installations to dutyholders at offshore wind and marine energy facilities.
8. The consultation generally sought to establish whether stakeholders and potentially interested parties considered the proposals to be reasonable, and whether the estimates of potential costs to industry were accurate.
9. This paper summarises HSE's analysis of the responses received to the consultation, HSE's response to stakeholders views and the proposed next steps.
10. It is designed to be read in conjunction with the consultation document¹⁰ and the policy options assessment document¹¹.

¹⁰ HSE CCUS and Offshore hydrogen consultation document (bottom of page) - https://consultations.hse.gov.uk/hse/proposals-carbon-capture-utilisation-storage/supporting_documents/Carbon%20Capture%20and%20Hydrogen%20Consultation%20Document.docx

¹¹ HSE CCUS and Offshore hydrogen options assessment (bottom pf page)- https://consultations.hse.gov.uk/hse/proposals-carbon-capture-utilisation-storage/supporting_documents/Carbon%20Capture%20Utilisation%20Storage%20Hydrogen%20Options%20Assessment.docx

Consultation methodology

11. The consultation ran on HSE's Consultation Hub¹² for ten weeks between 4 June and 13 August 2025. Responses were accepted through an online survey or via a Word document emailed to a shared mailbox. Some respondents sent unformatted response letters to the address(es) provided on the online platform predominantly concerning the questions concerning helicopter transfers and accommodation for HSE inspectors to offshore wind and marine facilities. Three responses were accepted after the survey closed from stakeholders who had contacted HSE explaining the need for a short amount of additional time.
12. This was an open consultation, however, due to the small size of the sector and its status as a developing technology, responses were predominantly anticipated from those with a significant interest in the sector. The consultation was publicised via HSE e-bulletins aimed at over 90,000 subscribers in relevant industries and was also sent directly to interested industry and government stakeholders.
13. The e-bulletin was opened over 40,000 times, the consultation questionnaire over 2500 times and in total 77 responses were received. The demographic of respondents reflected the expected audience, being predominantly health and safety professionals, employers, and employees.
14. The HSE Consultation Hub is based on a system which produces a raw data set and basic charted responses. HSE's Social Researchers and Economists collaborated with policy teams in HSE's Engagement and Policy Division and Subject Matter Experts from HSE's Energy Division to systematically analyse this data and consider qualitative consultation responses. Qualitative responses were each considered separately and have been summarised thematically in this report.
15. The described approach combined knowledge of the policy intent, scientific developments and scientific rigor during analysis of qualitative responses and interpretation of impacts on industry. It also enabled triangulation of scientific, operational and consultative evidence to maximise impacts of the evidence and to assist policy decision making in making a rounded assessment. HSE's social researchers apply methods set out in central government guidance on evaluation, [The Magenta Book](#), and [Social Research Association Ethics Guidelines](#).

¹² HSE Carbon Capture Utilisation and Storage and offshore hydrogen production consultation - <https://consultations.hse.gov.uk/hse/proposals-carbon-capture-utilisation-storage/>

Consultation responses and respondent demographics

16. The questionnaire consisted of 56 questions mostly utilising multiple-choice, Likert-scale response mechanisms for ease of completion. Supplementary qualitative questions aimed at gathering a broader understanding of the data and enhancing its robustness were also used.
17. The resulting quantitative data was subjected to a basic numeric analysis to determine majority responses. In addition, a thematic analysis was conducted using qualitative data from free-text and supplementary questions to ascertain reasons underlying responses and wider issues of significance to respondents.
18. There were 77 responses to the consultation in total: 46 responses to the online version of the consultation and 31 responses received as Word versions or response letters. Most of the letter responses referred to issues around questions 48 and 49, concerning helicopter transfers and accommodation for HSE inspectors to offshore wind and marine energy facilities, emphasising the unsuitability of helicopter transfers to some of these installations.
19. While this might be regarded as a good response rate for a small industrial sector, the number of responses to many of the questions is too low to extrapolate broadly across whole industries. Accordingly, the use of percentages has been avoided in discussing the data resulting from the questionnaire.
20. It should be noted that many respondents did not answer all the questions, which accounts for differences in total response numbers.
21. The consultation included questions to understand whether the respondent was an individual or represented an organisation, also to understand the size, location and approximate annual turnover of the business represented, as appropriate.
22. Responses were primarily from potential dutyholders and others involved in the sector, including health and safety professionals, employers and employees. 11 respondents described themselves as members of the public. The responses to questions on size and turnover of businesses were limited, with responses received being predominantly larger companies (over 250 people) and larger turnovers (over £50m).

Summary of response analysis and HSE response

23. Both quantitative and qualitative analyses of the responses to the consultation showed broad support for the proposals concerning CCUS operations offshore and in pipelines, and offshore hydrogen production. Useful feedback was received concerning the transport of inspectors to offshore wind installations. Responses to individual question areas are summarised below.

The transport of CO₂ in pipelines (onshore and offshore)

Proposal 1 - to apply the Part III requirements of the Pipeline Safety Regulations 1996 (PSR96) to pipelines conveying CO₂ in relation to CCUS operations, by defining CO₂ in gaseous phase, liquid phase, and supercritical phase as a dangerous fluid.

Policy questions response analysis

24. **For detailed background on this proposal and the consultation questions please see pages 14-18 of the consultation document.** Questions 1 and 2 whether CO₂ should be classified as a dangerous fluid, and eight questions on the proposal to classify carbon dioxide (CO₂) as a dangerous fluid under Schedule 2 of PSR96. The focus was on the overall proposal and on specific requirements that would be placed on dutyholders by this specific proposal. The questionnaire included free text follow up questions asking respondents to provide a reason for their response.
25. The responses to the overall proposal of classifying CO₂ as a dangerous fluid were broadly positive, with over half (40) of the responses to this question agreeing or strongly agreeing. 46 respondents provided free text rationale for their response, with the most commonly expressed opinion (32 responses) being that CO₂ is a high-risk substance and requires strong regulation. A small single figure of responses to these questions disagreed or strongly disagreed with the proposal, there was no clear rationale in the free text comments to provide reasons for not agreeing with the proposal.
26. Questions 3 - 9 sought specific views on the implications of classifying CO₂ as a dangerous fluid in PSR, which would require dutyholders to:
- fit emergency shutdown valves (ESDVs) to all risers of major accident hazard pipelines of 40mm or more in diameter at offshore installations.
 - submit a notification to HSE prior to construction or use of a pipeline and in other specified circumstances.
 - Produce and maintain a Major Accident Prevention Document (MAPD)
 - Put appropriate emergency arrangements in place.

- e. Have an emergency plan put in place by the Local Authority.
27. The responses to all these questions were broadly positive with single figures of respondents answering either 'disagree' or 'strongly disagree' apart from the question concerning production and maintenance of a MAPD were positive where all 31 responses provided were positive.
28. The free-text responses varied widely, and the small number of responses made it difficult to identify clear themes. However, several common points emerged. Respondents frequently referenced alignment with other regulatory requirements, proportionality to the risk posed by CO₂ and the importance of integrating requirements into a broader safety management framework. Some also noted that such measures help create a perception of safety and enhance public confidence, and 9 asserted that a requirement for Emergency Shutdown Valves (ESDVs) should be risk-based rather than determined by a fixed pipeline diameter. Comments on emergency response arrangements similarly emphasised that requirements should be proportionate to the level of risk.
29. Question 10 in this section asked respondents for any further comments on the regulation of CO₂ pipelines. The responses were varied with two consistent themes emerging; firstly, that the regulation of CO₂ pipelines must be commensurate to the risk that they present, and secondly that they should be controlled in similar ways to those operated by the oil and gas industry.
30. It was noted early in the consultation process that the question concerning MAPDs was visible in the Word version of the questionnaire but not the online version. This was corrected and early respondents to the online questionnaire were contacted to offer the option to respond to the question separately. The total number of responses to this question is lower than that of other questions in this section, but not so significantly that extra research was considered to be appropriate. All 31 responses received to this question were positive.

Costs estimate questions response analysis

31. Questions 11 – 22 asked about the potential costs of classifying CO₂ as a dangerous fluid under PSR96. It asked respondents whether they thought the estimated costs were accurate, too high, or too low. Since the CCUS industry is still developing in the UK and CO₂ pipelines are not yet in operation, there was no existing cost data available. Instead, initial estimates were extrapolated from data on oil and gas pipelines. The questionnaire included free text follow up questions asking respondents to provide a reason for their response.
32. The majority of responses to the cost-related questions were 'don't know.' As respondents had the option to leave questions blank, it is reasonable to conclude that those who did answer had reviewed the provided estimates and considered their views. Some data was provided in responses where respondents thought the estimates were 'too low', allowing for cost modelling to be updated.
33. The questionnaire provided an estimate for the costs of preparing a MAPD as approximately £28,000 and asked if this was about right. Although 'don't know' was

still the main response, 12 respondents said it 'too low' or 'much too low'. The free text supporting this question indicated that the cost of producing a MAPD was variable based on its content and resources required, with alternative estimates ranging from £40,000 to £200,000 given by 4 respondents, alternative estimates for the cost of maintaining and updating a MAPD of £7,000 to £20,000 were given by 3 respondents.

34. The questionnaire provided an initial estimate for the costs of liaising with the Local Authority to create emergency response procedures as approximately £7,900 per pipeline. Although 'don't know' was the main response, 10 respondents said it was 'too low' or 'much too low', while 3 responses gave alternative estimates ranging from £50,000 to £100,000. However, the small number of responses made it difficult to identify clear themes for reasons provided.
35. The final question in this section asked respondents for any further comments on costs associated with the regulation of CO₂ in pipelines. Although 15 respondents provided data, it was not possible draw any clear theme from the information.

HSE response

36. Responses to the questions on proposals to classify CO₂ as a dangerous fluid under PSR were broadly positive and supportive. No significant objections or alternative proposals were received. HSE intends to proceed with the proposed regulatory changes noting the ongoing importance of regulation and regulatory activity being proportionate to the hazards associated with this activity.
37. Responses to the questions on the estimated costs of this proposal were limited, with most questions receiving a 'don't know' response. However, the estimated costs for the upfront cost of producing a MAPD and for liaising with the LA on Emergency Procedures will be adjusted up by 25% to take into account the 'too low' responses and the alternative costs suggested.

CCUS operations offshore and offshore hydrogen production

Proposal 2 - to amend the Health and Safety at Work etc. Act 1974 (Application outside Great Britain) Order 2013 ('AOGBO') to apply HSE jurisdiction to offshore CCUS activities involving CO₂ in all chemical phases, and offshore hydrogen production

38. **For detailed background on this proposal and the consultation questions please see pages 19-27 of the consultation document.** The AOGBO applies specific sections of The Health and Safety at Work etc. Act 1974 (HSWA) beyond the mainland of Great Britain to specified offshore areas and work activities. The AOGBO currently applies HSE jurisdiction to offshore CO₂ storage and injection to CO₂ in gaseous phase but not to activities involving CO₂ in other phases or to hydrogen production offshore.

Policy questions response analysis

39. Questions 23 - 25 asked about proposals to extend existing offshore regulation to CCUS operations offshore and to offshore hydrogen production by amending the AOGBO. The consultation document explained that the sector is regulated by intersecting and complimentary regulations.
40. Between 30 and 34 respondents provided views on these questions with the majority being broadly supportive of the proposals with the majority of responses, where one was given, being 'Agree' or 'Strongly Agree', each question had single figures of responses that were negative.
41. The answers that emerged from the free-text data provided alongside these questions stated that extending health and safety regulations to these sectors would help address the risks and that the amendments to regulations were relevant. Additional comments made concerning CCUS operations were generally positive. Comments about offshore hydrogen production were also generally positive, however, three respondents asserted that regulation should be proportionate to the hazard associated with the industry. It was not possible to clearly draw any rationale for the small number of responses that were opposed to the proposal, however the comments about the need for regulation to proportionate are noted.

HSE response

42. HSE intends to proceed with this proposal noting the ongoing importance of regulation and regulatory activity being proportionate to the hazards associated with this activity.

Proposal 3 - To apply the duties of existing offshore regulation to (i) offshore CCUS activities involving CO₂ in all chemical phases, (ii) offshore hydrogen production and (iii) CCUS activities that do not involve an installation

43. **For detailed background on this proposal and the consultation questions please see pages 19-27 of the consultation document.** The Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995 ('MAR95') currently applies to installations involved in offshore CO₂ storage and injection when CO₂ is in gaseous phase, but not to activities involving CO₂ in other phases or to hydrogen production, or to CCUS activities that do not involve an installation.
44. The Offshore Installations (Offshore Safety Directive) (Safety Case etc) Regulations 2015 ('SCR15') was written to apply to offshore activities concerned with the exploration and production of hydrocarbons and so does not fully, clearly or consistently apply to CCUS operations or hydrogen production activities offshore. Nor does it apply to offshore activities that do not involve an installation, which may be the case for some CCUS projects.

45. The Offshore Installations and Wells (Design and Construction, etc.) Regulations 1996 ('DCR95') was written to apply to offshore activities concerned with the exploration and production of hydrocarbons and so does not fully, clearly or consistently apply to CCUS operations or hydrogen production activities offshore. Nor does it apply to offshore activities that do not involve an installation, which may be the case for some CCUS projects.

Policy questions response analysis

46. Questions 26 - 31 asked respondents whether they agreed that the requirements of MAR95, SCR15 and DCR96 should be extended to CCUS operations.

47. As the regulations are detailed and contain varying and multiple requirements specific to individual circumstances, the consultation sought views on whether respondents agreed with the principle of the proposal. The questionnaire included free text follow up questions asking respondents to provide a reason for their response.

48. The responses to these questions were broadly supportive of the proposals, with the majority of responses, where one was given, being 'Agree' or 'Strongly Agree'.

49. The most common themes emerging from respondents' free text comments supporting the proposals concerned the need for effective controls and safety measures. Many responses noted that any regulations applied in this sector should be both relevant and proportionate, however 4 respondents stated that they did not think SCR15 would be relevant as a regulation if there was no installation being used.

Cost estimate questions response analysis

50. Questions 32 – 47 focused on potential costs of the proposal to extend the requirements of existing offshore regulation to CCUS operations and to offshore hydrogen production. As the CCUS and offshore hydrogen production industries are developing in the UK, and planned projects are not yet fully operational there was limited cost data to work with. Thus, estimates were extrapolated from available existing data.

51. Given the wide range of requirements for dutyholders under offshore regulations, it was concluded that the most appropriate approach was to focus on some of the largest potential costs. This allowed for testing whether the overall cost model was broadly correct. The questionnaire also included free-text follow-up questions, inviting respondents to explain the reasons for their answers.

52. The most common response to all the cost questions was 'don't know'. As respondents could leave questions blank if they did not want to provide an answer, it is reasonable to draw a conclusion that those who did respond did review the estimates provided and think about their views.

53. Questions were asked on the costs of preparing and submitting a Safety Case, and a five-year review of a Safety Case. For both these questions 10 of those

respondents who provided a meaningful response stated that the costs were 'about right'. This can be viewed as a reasonable indication of the overall cost model being reasonably accurate. A question was asked on the costs of putting maintenance and operation instructions and procedures into writing at company level. This question had a broader range of answers with 6 respondents saying the estimate was 'too high', 4 'too low' and 3 'about right'. No alternative estimates were provided.

54. There were few common themes in the free-text responses. However, comments on Helicopter Landing Officers (HLOs) often noted that HLOs typically hold multiple roles on an installation. Other responses, particularly those related to the costs of preparing and submitting Safety Cases, verification schemes, and notifications, indicated that these costs vary between installations. Only a small number of respondents suggested alternative cost estimates.

HSE response

55. Responses to the questions on proposals to extend offshore regulation to CCUS operations and offshore hydrogen production were also broadly positive and supportive. No significant objections or alternative proposals were received. HSE intends to proceed with the proposed regulatory changes noting the ongoing importance of regulation and regulatory activity being proportionate to the hazards associated with these industries.

56. Responses to the questions on the estimated costs of this proposal were limited, with most questions receiving a 'don't know' response. The responses to potential costs for well examination schemes, whilst broadly in agreement, were slightly skewed to 'too low'. However, as the potential cost range was already wide (£23,000 - £83,000) and limited data on alternative costs was received it is not proposed to alter the cost estimate.

Inspection of offshore wind energy installations

Proposal 4 – Provision of helicopter transport, accommodation and subsistence for inspectors

57. **For detailed background on this proposal and the consultation questions please see pages 28-29 of the consultation document.** Currently dutyholders are required to provide transport, accommodation and subsistence to inspectors under the provisions of The Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995 (MAR95). These provisions do not extend to offshore wind energy installations, and transport is currently provided by operators on a voluntary basis.

58. With the significant expansion in wind energy operations expected (Government mission to quadruple offshore wind energy by 2030) and associated potential increase in HSE activity it is proposed to extend the requirements to provide

transport, accommodation and subsistence to wind energy installations to ensure HSE is able to appropriately regulate this growing sector.

Policy and cost questions response analysis

59. Question 48 asked stakeholders whether they agreed with the proposal and Question 49 asked about the estimated costs of the proposal.
60. There were 51 answers from respondents expressing an opinion in response to the first question. 29 respondents disagreed or strongly disagreed that the requirement to provide helicopter transport, accommodation and subsistence to inspectors when undertaking regulatory activity on offshore installations should be extended to include offshore wind energy installations. An additional 22 contributors agreed or strongly agreed with the proposal. The most consistent theme in the free-text responses was that helicopters are often unnecessary or impractical for accessing many wind energy installations, and that requiring their use would impose prohibitively high costs on the industry, 4 respondents suggested that marine transport may be a more suitable alternative.
61. 29 respondents answered the question on estimated costs, with 20 saying the estimate was 'too low' or 'much too low'. The free text responses to this question provided alternative estimates ranging from £6,000 to £50,000. Free text responses to this question also noted that numerous factors contribute towards potential costs whilst 3 reiterated that helicopters are not necessary and / or practical for accessing many installations.

HSE response

62. Responses to the questions on proposals that dutyholders be required to provide helicopter transport, accommodation and subsistence to inspectors when undertaking regulatory activity at offshore wind energy installations were largely negative. However, responses were focused on the helicopter transport element with limited views offered on the other aspects such as the general principle of providing transport, accommodation, and subsistence. HSE intends to proceed with the proposed regulatory changes but without the method of transport being specified. HSE will continue to note the ongoing importance of regulation and regulatory activity being proportionate to the hazard.
63. Responses to the questions on the estimated costs of this proposal were focused on the helicopter transport aspect, with most respondents stating the estimate was too low. HSE intends to review this element of the model using the alternative estimates provided.

Concluding Questions

64. The concluding questions of the consultation asked for any further comments on the proposals, and for views on whether any unintended consequences could be foreseen. 46 respondents provided further comments. While responses varied, several consistent themes emerged. The necessity for effective safety measures

and controls in the sector, together with the need for regulation to be proportionate and suitable for the sector. Then, the need for regulation and guidance to be clear, and the need for continuing engagement between HSE and the sector.

65. 29 of the 51 respondents who provided a response to the question on unintended consequences said 'yes'. However, the comments in the free text were numerous and varied. The most common themes were that regulation should be proportionate to the risk presented and that engagement with HSE could help the sectors manage the impacts of the changes put forward. Moreover, 6 responses noted that forcing the offshore wind sector to accommodate helicopter transport could impact achievement of the UK's renewable energy goals.
66. Responses to the questions on proposals to classify CO₂ as a dangerous fluid under PSR were broadly positive and supportive. No significant objections or alternative proposals were received. HSE intends to proceed with the proposed regulatory changes noting the ongoing importance of regulation and regulatory activity being proportionate to the hazards associated with this activity.
67. Responses to the questions on the estimated costs of this proposal were limited, with most questions receiving a 'don't know' response. However, the estimated costs for the upfront cost of producing a MAPD and for liaising with the LA on Emergency Procedures will be adjusted up by 25% to take into account the 'too low' responses and the alternative costs suggested.

Next steps

68. HSE acknowledges the support from all stakeholders who shared and promoted this consultation and all those who took time to respond. All responses have been considered within this analysis.
69. The consultation findings will feed directly into the development of regulatory amendments regarding CCUS operations offshore and in pipelines, offshore hydrogen production, and inspection of offshore wind energy installations.

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