

Dear Bogdan,

The CCSA does not wish to submit a formal detailed response to this consultation but I would like to make the following general observations:

1. It is an economic and environmental imperative that CCS is developed as quickly as possible internationally but especially in the UK where development of CCS is extremely compelling. CCS represents a major opportunity for prosperity and employment for the UK whilst promising to be a cost-effective option to meet national climate objectives. This is embodied in current Government policy.
2. The provision of transportation infrastructure for the first project represents a significant financial hurdle so re-use of existing assets will make an important contribution towards minimising barriers to early adoption of CCS. For that reason it will be essential to utilise all possible redundant assets both on-shore and off-shore where this can be achieved.
3. The fossil fuel industry has a major interest in the development of CCS projects to continue to be able to provide energy supplies in a low carbon future. This includes gas as well as solid fuel as the current policy is to aim to have all power generation decarbonised by 2030.
4. The transportation of captured CO₂ for storage is not a high added value operation. Indeed CCS significantly increases the costs of fossil fuel generation, particularly for early projects that will have an inherently higher cost. Re-use of existing assets presents an opportunity to minimise early development costs given favourable terms for the transfer of the assets.
5. The design, planning and approvals process for CO₂ pipelines could take a considerable time and may hold up the early development of commercial development of CCS. Re-use of existing assets is an opportunity to accelerate the introduction of CCS in the UK.

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The Carbon Capture & Storage Association (CCSA) exists to represent the interests of its members in the business of capture and geological storage of carbon dioxide (known as Carbon Capture and Storage, or CCS) as a means of abating atmospheric emissions of carbon dioxide and potentially, as a means of enhancing the production of fossil hydrocarbons. From its base in London the CCSA brings together specialist companies in manufacturing & processing, power generation, engineering & contracting, oil, gas & minerals as well as a wide range of support services to the energy sector such as law, banking, consultancy and project management.