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Note: TotalEnergies is abbreviated throughout the consultation response to "TTE".

3.1 Planned investment in clean energy industries (partially grouped answer)

Question 1a: What role can government play to ensure that local workers can benefit from the growth of these new energy sectors?

The key determinant in enabling local workers willing to transition is the availability of projects. A visible, continuous pipeline of UK energy projects under development will allow management, upskilling and training of personnel, supporting the opportunity for transfers between businesses. [redacted]

12.5(e)

[redacted]

12.5(f)(ii)

[redacted]

12.5(f)(ii)

[redacted]

Question 1b: In addition to the investments in clean energy industries outlined in this section, are there any other areas you think should be targeted for investment?

Question 1c: What opportunities do you foresee for the oil and gas industry to invest into clean energy?

[redacted]

12.5(f)(ii)

[redacted]

12.5(f)(ii)

[redacted]

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Question 1d: Which locations offer the best opportunities for investment in clean energy industries?

Typically, either where the resource is or where consumer need is greatest. For CCS, examples include the UK North Sea for CO2 storage areas and large industry areas in the UK (emitters). In the case of offshore wind, Scotland brings very large marshalling (storage) areas to accommodate the specific needs of the sector. It is also an established logistics base, with quayside infrastructure, and a skilled workforce already embedded from the oil and gas sector.

3.2 Jobs supported by planned investment in clean energy industries (grouped answer)

Question 2: What, if any, additional measures could help the oil and gas workforce to transition into a) clean energy and b) other industrial strategy sectors?

Question 3a: What support is required for oil and gas workers to transition into low carbon sectors that align with the UK's longer-term environmental and economic ambitions, as proposed within this consultation? In your response, please consider the transition through different lenses – for example, by location (domestically and internationally) or by demographic.

Question 3b: How do you think we should approach measuring the transition of workers from the oil and gas sector to low-carbon industries? Do you have a view on what metrics we could be using to measure the transition of workers from the oil and gas sector to low carbon sectors?

Question 3c: How would you define a good work opportunity within the low-carbon economy? In your response, please consider fair remuneration, the role of trade unions and creating jobs that are inclusive and contracted with financial security.

Question 3d: What, if any, other key occupations not already listed could oil and gas workers transition into that you think are important to supporting the transition to a low carbon economy?

Question 3e: Do you think the UK has a sufficient skills base to underpin the transition? What role will the oil and gas sector play in the availability of critical skills?

Refer to section 3.3 which includes TTE's comments on the topic of "jobs supported by planned investment in clean energy industries."

3.3 Facilitating opportunities for oil and gas workers

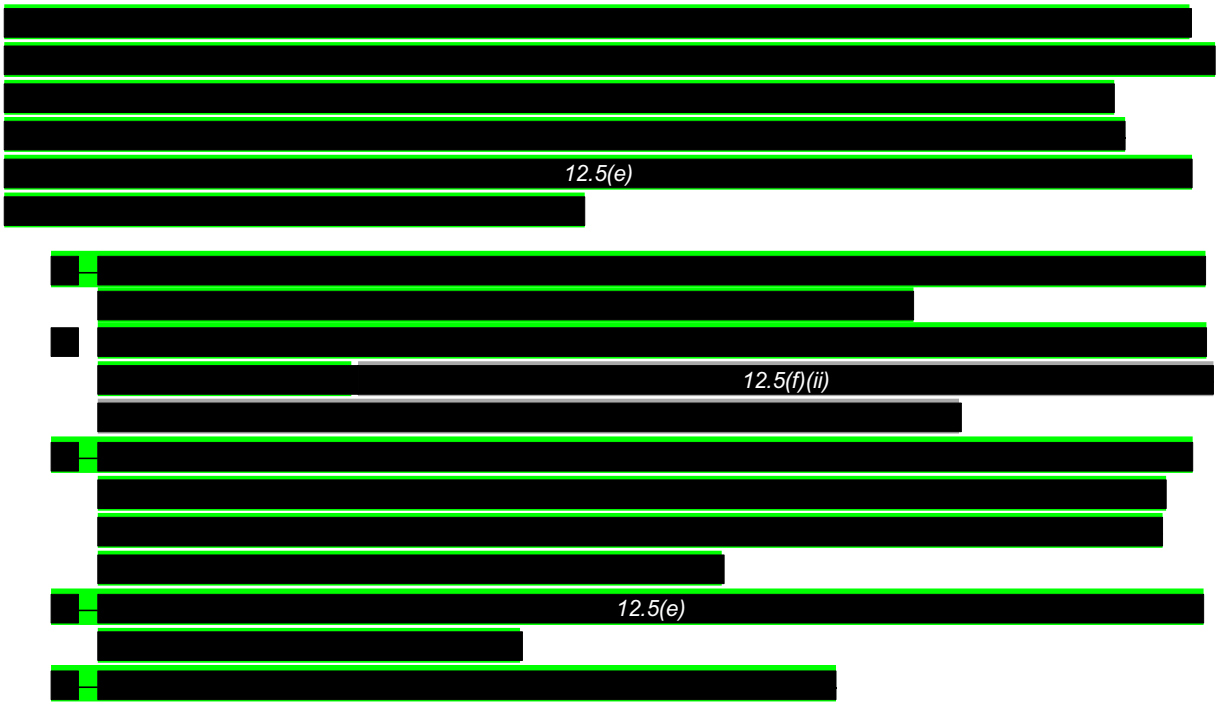
Question 4a: How can government and industry develop the skills passport into a meaningful and effective mechanism for workers to transition from oil and gas into other industries? What is the correct role for industry and government to make this happen?

[redacted]

12.5(f)(ii)

[redacted]

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Question 4b: What can we do to further support specific local communities that are heavily reliant on oil and gas through the transition?

Accelerating the decline of domestic production from the UKCS, before domestic demand reduces, will result in increased imports leading to increased global emissions. It also risks a disorderly transition of the basin, by negatively impacting the continuity of the project pipeline required to sustain the domestic supply chain whilst the renewables/low carbon sectors build scale. This will lead to consequential impacts on the communities across the UK that are reliant on oil and gas.

This can be addressed through measures to maximise economic indigenous oil and gas production, which would support the UK's energy security, sustain and anchor the domestic supply chain, enabling the renewable/low carbon sectors to build scale and ultimately provide continuity in the project pipeline, the key determinant for a managed transition of the workforce.

Question 4c: Are you aware of any examples of successful collaborations between regions or sectors that could serve as a model for facilitating worker transitions?

TTE is a leading multi-energy company in the UK, developing our two-pillar strategy across Integrated Power and oil and gas (for example with gas produced used to generate power).

TTE's UK renewable investments include Seagreen (1.1GW), Scotland's largest offshore wind farm and the world's deepest fixed-bottom wind farm, which became fully operational in 2023. We are also participating in the Northern Endurance Partnership, a Carbon Capture and Storage Project, operate one of the largest EV charging networks in London and have approximately 600MW of solar projects across the UK. We have an ambitious pipeline of offshore wind developments in the UK, which include Outer

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Dowsing, a 1.5GW wind farm in development off the coast of Lincolnshire awarded in Offshore Wind Leasing Round 4, and West of Orkney, a 2GW fixed-bottom project being developed off the North Coast of Scotland. TTE also holds a 50% stake in the West Burton 1.3GW gas fired power plant and 49MW battery storage system.

[redacted]
12.5(e)
[redacted]

3.4 Other challenges to moving oil and gas workers across to clean energy sectors (grouped answer)

Question 5a: We would welcome any evidence you can share on any of the barriers mentioned in this section (pay, geography, policy uncertainty, employer incentive to support retraining, aging workforce).

Question 5b: What, if any, additional barriers not already mentioned in this section are you aware of?

Question 5c. What do you think could be done to improve the pay and standards of the clean energy sector and help ensure a proper role for trade unions?

Question 6: How can we enhance diversity within the sector? In your response, please consider the role of external organisations (such as employers and trade unions), and detail which group or persons this intervention would benefit.

The key determinant in a successful transition for the workforce is the availability of projects. Accelerating the decline of domestic production from the UKCS risks a disorderly transition, negatively impacting the continuity of the project pipeline and limiting the opportunity for elements of the workforce willing to transition.

This can be addressed through measures to maximise economic indigenous oil and gas production, which would support the UK's energy security, sustain and anchor the domestic supply chain, enabling the renewable/low carbon sectors to build scale and ultimately provide continuity in the project pipeline.

[redacted]
12.5(e)
[redacted]

3.5.5 Supporting the supply chain to reach its potential (partially grouped answer)

Question 7a: Which parts of the oil and gas industry supply chain do you think will be most affected by the transition, and what impacts will it have on the workers within those businesses?

[redacted]
12.5(f)(ii)
[redacted]

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[redacted] 12.5(f)(ii) [redacted]

Question 7b: What potential barriers exist for current oil and gas supply chains to transition to alternative sectors?

Question 7c: What additional measures can we take to support these supply chains during the transition?

The lack of availability of UK projects across the energy spectrum presents a clear barrier to the UK supply chain's transition to alternative sectors.

OEUK's 2025 Supply Chain Report identified that "UK energy supply chain companies see tax rates, political and project uncertainties, operating costs and more attractive opportunities elsewhere as their top challenges in investing in the UK." It noted that "High tax rates hinder investment and

competitiveness, while project uncertainty, often arising from the tax situation, delays investment in supply chain capability."

Accelerating the decline of domestic production, before domestic demand reduces, will result in increased imports leading to increased global emissions. It risks a disorderly transition of the basin, negatively impacting the project pipeline required to sustain the domestic supply chain whilst the renewables/low carbon sectors build scale.

This can be addressed through measures to maximise economic indigenous oil and gas production, which would support the UK's energy security, sustain and anchor the domestic supply chain, enabling the renewable/low carbon sectors to build scale and ultimately provide continuity in the project pipeline, the key determinant for a managed transition of the workforce.

Question 7d: What are the current existing key strengths in the UK supply chains for these sectors?

A detailed assessment of the strengths of the UK oil and gas supply chain for opportunities in new energy sectors was produced Rystad Energy's energy supply chain report , which shows the oil and gas supply chain has 60 to 80% of the capabilities required to develop the UK's low carbon energies.

Question 7e: Do you think that UK supply chain companies will be competitive in accessing growing clean energy sectors in the North Sea? What role can government play in supporting them?

Question 7f: What key export opportunities do you anticipate will be open to the UK supply chain, because of the development of clean energy sectors in the North Sea?

OEUK's sentiment survey as part of its 2025 Supply Chain Report issued on 19th March 2025, revealed nine companies out of every 10 see more attractive opportunities to grow their business overseas due to uncertainty and a less positive business environment at home.

In order to anchor the UK supply chain to deliver the renewable/low carbon projects of the future, continuity of the project pipeline is critical. This can be addressed through measures to maximise economic indigenous oil and gas production, which would sustain and anchor the domestic supply chain, enabling the renewable/low carbon sectors to build scale and ultimately provide continuity in the project pipeline.

Question 7g: Where do you see the main opportunities in a) offshore wind b) floating offshore wind, c) CCUS (T&S) d) hydrogen e) decommissioning for the oil and gas supply chain?

TotalEnergies is a leading multi-energy company present across the energy value chain.

Our renewable investments include Seagreen (1.1GW), Scotland's largest offshore wind farm and the world's deepest fixed-bottom wind farm, which became fully operational in 2023. We are also participating in the Northern Endurance Partnership, a Carbon Capture and Storage Project, operate one of the largest EV charging networks in London and have approximately 600MW of solar projects across the UK.

We have an ambitious pipeline of offshore wind developments in the UK, which include Outer Dowsing, a 1.5GW wind farm in development off the coast of Lincolnshire awarded in Offshore Wind Leasing Round 4, and West of Orkney, a 2GW fixed-bottom project being developed off the North Coast of Scotland.

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[redacted]

12.5(e)

[redacted]

4.1.1 Managing existing fields for their lifespan (partially grouped answer)

Question 8: How can we improve our understanding of the interconnected basin, including its opportunities and risks? Do you have any evidence you can share about this?

Question 9: How can we manage future oil and gas production from existing fields, in a way that accounts for the interdependencies across existing assets and supports an orderly transition across the basin? We would welcome examples of technical or commercial dependencies including timing-related considerations if relevant.

Extending the production life of existing UKCS assets through infrastructure led exploration and tie-ins sustains the existing workforce and positively impacts other elements of the value chain, including pipelines, processing facilities and other areas of critical infrastructure. It supports continuity of the project pipeline, required to anchor the domestic supply chain whilst the renewables/low carbon sectors build scale.

[redacted]

12.5(f)(ii)

[redacted]

12.5(e)

[redacted]

The awarding of appropriate new licences is consistent with the UK Climate Change Act 2008 and the Climate Change Committee 7th carbon budget. The Climate Change Committee in the 7th carbon budget estimates the UK requires 13-15 billion barrels of oil and gas equivalent in the period 2025 to 2050. The UK is currently forecast to produce less than one third of that demand. Any additional production through the award of new licenses will reduce the level of imported energy, whilst remaining within the 7th carbon budget.

[redacted]

12.5(e)

[redacted]

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[redacted]

12.5(e)

[redacted]

Question 10: How can decarbonisation projects or asset repurposing support an orderly transition of the basin, or vice versa? Please share any evidence to support your suggestions.

[redacted]

12.5(f)(ii)

[redacted]

12.5(f)(ii) Accelerating the decline of domestic production from the UKCS, before reducing domestic demand will result in increased imports leading to increased global emissions. It also risks a disorderly transition of the basin, by negatively impacting the continuity of the project pipeline required to sustain the domestic supply chain whilst the renewables/low carbon sectors build scale.

[redacted]

12.5(f)(ii)

[redacted]

4.1.2 Offshore licencing (grouped answer)

Question 11a: To what extent do you agree or disagree that this position on new licenses will support the UK to set a globally leading example in tackling climate change?

Question 11b: Is there anything else you think should be considered in the government's definition of i) licensing and ii) new fields? What would be the case for doing so, including consideration of the commercial and environmental impacts?

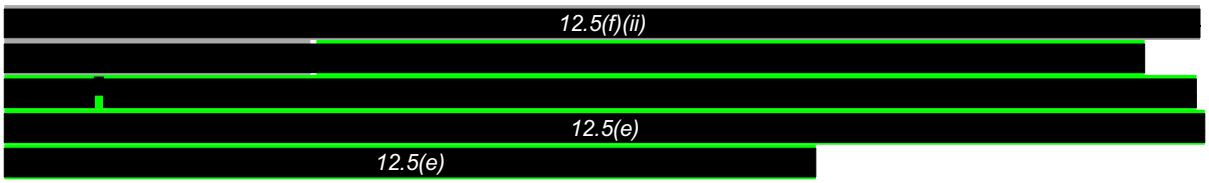
Question 11c: Aside from oil and gas, are there any other sectors you think would be affected by these proposals? If yes, how would they be affected?

Question 11d: Do you anticipate any situations where additional targeted interventions might be needed or beneficial to support the government's climate and North Sea objectives? If so, what criteria or mechanisms do you think should be used to determine whether such situations have arisen?

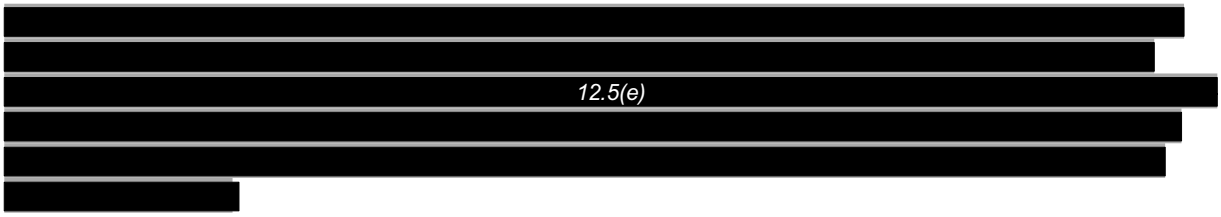
Question 12a: What, if any, impact do you think these policy considerations could have on businesses? Please consider if small and micro and/or medium-sized businesses would be disproportionately affected.

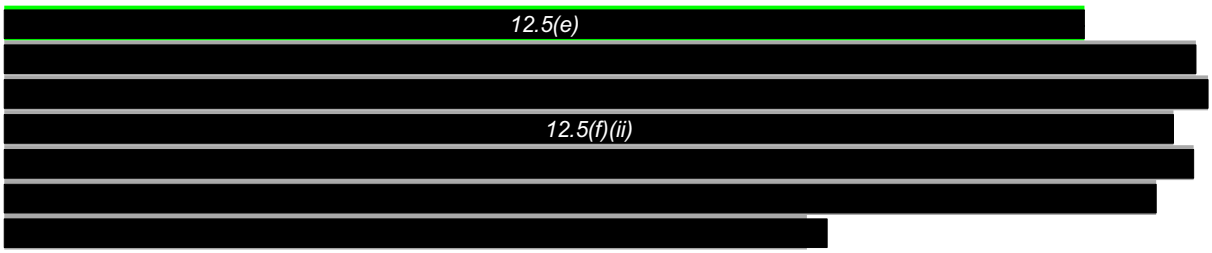
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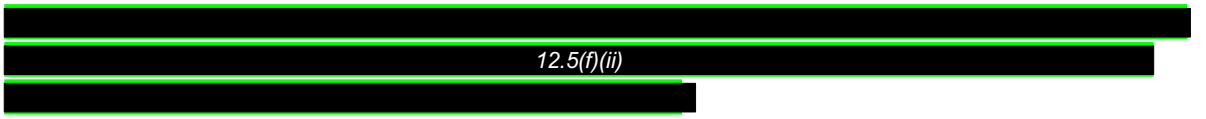
Question 12b: What, if any, impact do you think these policy considerations could have for individuals with protected characteristics? If there are negative impacts, what potential mitigations could be explored?

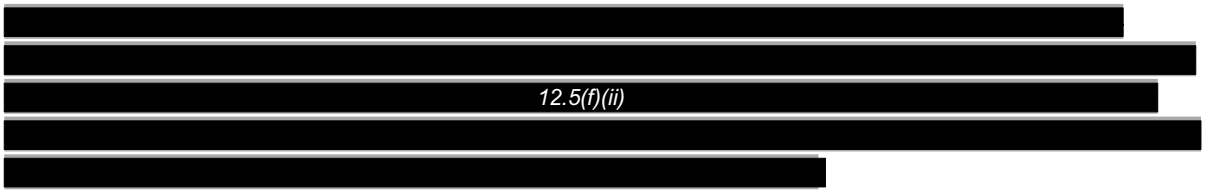


Furthermore, maximising economic indigenous oil and gas production supports the UK's energy security and sustains the domestic supply chain required to deliver the low carbon projects of the future, providing continuity in the project pipeline whilst renewable/low carbon sectors build scale.









4.2 The future focus of the NSTA (grouped answer)

Question 13a: Which of the following options for revising the principal objectives, if any, do you prefer?

[1] The NSTA published analysis in July 2023 comparing the carbon intensity of producing United Kingdom Continental Shelf (UKCS) gas with importing liquefied natural gas (LNG). The analysis shows that the carbon intensity of producing gas domestically is on average almost four times lower compared with importing gas in LNG form.

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Question 13b: Please share your rationale for your answer to question 13a. If you prefer the introduction of a revised single principal objective, or the introduction of sub-objectives or multiple primary objectives, please outline what you think the objective(s) should cover.

Question 14a: What are your views on the ideas for reforms to the NSTA's powers considered above.

Question 14b: In addition to those explored above, are there any other areas of the NSTA's powers which could benefit from reforms?

12.5(e)

MER UK remains compatible with the UK Climate Change Committee Balanced Pathway to achieve net zero greenhouse gas emissions by 2050. Furthermore, maximising economic indigenous oil and gas production supports the UK's energy security, sustains the domestic supply chain whilst renewable/low carbon sectors build scale and provides continuity in the project pipeline, the key determinant for a managed transition of the workforce.

TTE acknowledges the government's recent call to regulators to play a more active role in driving economic growth, as part of a broader strategy to streamline regulations and reduce administrative burdens on businesses.

12.5(e)

12.5(e)