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12 June 2024

REF: Consultation - Proposal for changes to the Public Administration Act and sectoral legislation with regard to shipping

To whom it may concern,

We write to provide comment on the proposals for changes to the Public Administration Act and sectoral legislation with regard to shipping.

About the EnerGeo Alliance

Founded in 1971, the EnerGeo Alliance is a global trade association for the energy geoscience industry, the intersection where earth science and energy meet. Providing solutions to revolutionize the energy evolution, the EnerGeo Alliance and its member companies span more than 50 countries, representing onshore and offshore survey operators and acquisition companies, energy data and processing providers, energy companies, equipment and software manufacturers, industry suppliers, service providers, and consultancies. Together, our member companies are the gateway to the safe discovery, development, and delivery of mainstay sources of energy, alternative energy, and low-carbon energy solutions that meet our growing world's needs.

Through reliable science- and data-based regulatory advocacy, credible resources and expertise, and future-focused leadership, the EnerGeo Alliance continuously works to develop and promote informed government policies that advance responsible energy exploration, production, and operations. As the global energy demand evolves, we believe that all policymakers and energy



companies, providing mainstay, alternative, and low-carbon solutions, – should have access to reliable data and analysis to support their forward moving efforts.

Activities on the Norwegian Continental Shelf

Members of EnerGeo Alliance are active in providing geoscience data acquisition services across a range of applications within Norwegian waters including hydrocarbon exploration, offshore wind site characterisation, carbon storage and seabed minerals. In so doing, member companies operate specialised vessels with international maritime and technical crews on board, spending periods of time that maybe weeks or months in duration while actively surveying, before likely moving to other locations globally to continue operations in other jurisdictions. The vessels operate in a global market, regularly moving between jurisdictions in carrying out work to acquire data on behalf of national and international energy companies. Data acquisition can and often does take place across borders, including working across the border with the United Kingdom for example, when surveying locations in the North Sea.

Marine geoscience survey vessels are typically accompanied by support vessels in order to provide safety, maintenance and fisheries response services during survey operations. The flag of vessels varies, with some being flagged in Norway, and many being flagged internationally, as is common within the shipping sector generally. A number of our member companies are headquartered in Norway, and the NCS remains a critical area for the work of our members, carrying out regular survey activities during the summer season.

Consultation

EnerGeo Alliance is not an invited consultation body of the Ministry of Trade and Fisheries. As such, the consultation was not something that we had been aware of from the time of it being launched. Given the scale of member company work within Norway, we would like to request that EnerGeo Alliance be included as a consultee going forward, so that we have awareness of any related consultations as soon they are made available in the future. It has not been possible within the current timeframe to fully consider the potential consequences of the proposed legislative changes, but we would like to highlight the following points for clarification and consideration:

- Our understanding is that bill does not introduce requirements for Norwegian wages, and that these would be detailed within regulations to be drawn up at a later date (p. 61). As highlighted, we would like to ensure that we are able to fully participate in relevant consultation processes as they are launched by the Ministry.
- We wish to request clarity regarding the boundaries of application to the proposed changes in relation to the role of crew. The proposal states that applicable personnel are

those who carry out activities with a predominantly maritime element. We assume therefore that this excludes survey personnel, which would be analogous to 'industrial personnel who carry out petroleum activities' (p. 58).

- Following the development of relevant regulation, the potential to increase wages through equalisation between foreign and Norwegian ships could be significantly impactful. The main consequence to highlight is that this may lower the appetite for investment. For vessels operating within a global market, companies are likely to deploy assets preferentially in those areas where returns on investment can be maximised.
- It is understood that through assessing the economic consequences of the potential regulations, 'certain categories of ships should not be covered by the future regulation' (p. 62). As an industry, particularly the highly specialized energy geoscience sector that operates in a global market as highlighted, we would like to take the opportunity to suggest a specific exclusion for the marine geoscience sector.

Summary

EnerGeo Alliance welcomes the opportunity to provide comments on the proposed changes related to wages and working conditions on vessels operating in Norwegian waters. Our member companies provide services of significant value and benefit to Norway, operating a small and highly specialised fleet of vessels globally, with significant activity levels within Norway across a range of applications. Further, we acknowledge and support comments submitted in relation to this consultation by Offshore Norge.

In order to discuss the nature of our sector in more detail and the intent of the proposed bill and subsequent regulations, we would like to request a meeting at a mutually convenient time in the near future. We remain at your disposal to provide any further information or clarification as may be helpful as the Ministry considers responses to the present consultation.

Sincerely,

Bengt Larssen

Chair – EnerGeo Alliance Norway Workgroup

Copies to:

Henrik Roende – Vice Chair – EnerGeo Alliance Norway Workgroup

Dustin Van Liew – Vice President, Global Policy and Government Affairs

Ross Compton – Director, Global Policy