

Offshore Norge's input to the update of the EU Arctic Policy

16 March 2026

Offshore Norge is the industry association for companies with activities on the Norwegian Continental Shelf within oil and gas, offshore wind, carbon capture and storage (CCS) and related activities. We are grateful for the opportunity to provide input to the upcoming revision of the EU Arctic Policy. The energy sector will continue to play an important role for the development of the Arctic, and we are happy to clarify or provide further input if needed.

The 2021 EU Arctic Policy lacks a clear definition of the Arctic. For this note, we therefore use the term "Arctic" broadly.

Recommendations

Anchored in the objectives of **REPowerEU**, the White Paper for European Defence – **Readiness 2030**, and the ongoing **revision of the EU's Energy Security Framework**, Offshore Norge sets out the following recommendations for the update of the EU Arctic Policy:

1. **The Commission should align the EU's Arctic Policy with energy security policy objectives**, including security of supply, diversification and resilience, and closer energy cooperation between those who safeguard political stability, transparent governance, a strong rule of law, and with a conviction that the climate crisis must be addressed.
2. **The Commission should recognise economic activity in the Arctic as a security enabler for the EU.** Sustained settlement, employment and industrial activity in North Norway are essential to situational awareness, resilience, as well as structural surveillance and emergency preparedness. These factors contribute to strengthening Norway's and its allies' situational awareness and to supporting NATO and EU efforts to safeguard shared interests in the High North.
3. The Commission should reflect in the revised Arctic Policy that **the Norwegian part of the Arctic that is open for petroleum activities, are governed by well-established and comprehensive environmental and oceanic management plans and governance.** These plans are based on scientific ecosystem data, updated on a regular basis and grounded in broad democratic processes. The current operations take place in areas that are ice-free year-round.

Secure and predictable energy supply from trusted partners is a core security imperative. The European Parliament recognizes this e.g. in its Report on the Security of Energy Supply in the EU (2025/2055(INI)) and in the Report on the EU's Diplomatic Strategy and Geopolitical Cooperation in the Arctic (2025/2116(INI)). **Norway provides a stable and increasingly important source of energy for Europe.** Norway currently supplies around one third of the EU's natural gas demand. In 2025 34 % of this volume originated from North Norway, i.e. the

Norwegian Sea and the Barents Sea – a share expected to rise to 50 % in a few years partly due to maturation of fields in the south. See the *Annex* for further discussion.

Norway’s offshore oil and gas industry is an integral part of Europe’s and allies’ security and preparedness architecture in the Arctic. Through stable and reliable production, resilient infrastructure, advanced technological competence, environmental governance, and sustained settlement all the way to the Russian border, our industry contributes directly to European energy security, strategic autonomy, and resilient European value chains. This brings societal robustness and geopolitical stability in a region marked by growing strategic competition.

Aligning the EU’s Arctic Policy with Energy Security Policy objectives

Norway is providing EU with stable and reliable supplies of oil and gas from its continental shelf, including gas from the Norwegian Sea in pipelines and Liquefied Natural Gas (LNG) by ship from the Barents Sea. A map of producing fields is shown in *the Annex*.

Petroleum activity in North Norway provides substantial industrial activity which employs thousands of people in the region, contributing to sustainable local societies and settlements. See the *Annex* for further description.

Norway’s National Security Strategy (2025) identifies secure energy deliveries as Norway’s most important contribution to European security and underscores the need to protect and rapidly restore critical energy infrastructure in close cooperation with allies. By reducing the need for importing energy from non-democratic third countries, the Norwegian energy supply contributes to Europe’s strategic autonomy and independence. This is, as Commission President Ursula von der Leyen highlighted in her State of the Union speech in September 2025, a key priority for European security.

We note the EU objectives under **REPowerEU** and the conclusions of the **energy security framework fitness check**, which underline the importance of supply diversification and the strengthening of energy security through cooperation with trusted partners. We also note the recommendations in the **Draghi Report**¹ about trading gas with “reliable trade partners such as Norway”. With a continued strong demand for natural gas in the European market, moving away from Norwegian supply would most likely give the unwanted effect that the production and transport emissions will be moved to places with lower societal and environmental standards and thus harm rather than support the EU’s climate policy targets, and reduce the Union’s energy security level.

So, when the 2021 Arctic Policy maintains that “*the Commission shall work with partners towards a multilateral legal obligation not to allow any further hydrocarbon reserve development in the Arctic or contiguous regions, nor to purchase such hydrocarbons if they were to be produced*”, this does not appear to align with the current practises nor with the

¹ The Draghi report on EU competitiveness (2024): https://commission.europa.eu/topics/competitiveness/draghi-report_en

current requirements for more European strategic autonomy or the political priorities of the von der Leyen II Commission.

We are concerned that, if maintained, this statement would add a political risk to energy projects in the region, and thus a risk also for the future of the Arctic societies, a risk for the EU's energy security and competitiveness, and consequently a risk for Europe's safety and security.

We recommend that the misalignment between these policies is considered carefully during the revision of the Policy.

Recognising the economic activity in the Arctic as a security enabler for the EU

In addition to contributing to energy security, offshore oil and gas activity in North Norway strengthens traditional European security in two mutually reinforcing ways:

- It sustains permanent settlement, employment and public services in strategically vital areas, helping prevent depopulation that would weaken societal resilience, situational awareness and long-term assertion of sovereignty and security.
- At the same time, energy infrastructure underpins surveillance, monitoring and emergency preparedness. Offshore installations, pipelines, terminals and logistics hubs bring advanced monitoring systems, maritime domain awareness and close cooperation with public authorities, enhancing the ability to detect and respond to threats and incidents.

Norwegian oil and gas companies operate in close partnership with national and local authorities and are integrated into total defence and civil preparedness structures and practices both onshore and at sea. Protecting critical energy infrastructure is inseparable from Europe's broader defence posture and resilience against hybrid threats. Energy installations, maritime traffic, ports and supply chains therefore form part of a wider security ecosystem, strengthening allied situational awareness and supporting NATO and EU efforts to safeguard shared interests in the High North.

Reflecting that the Norwegian part of the Arctic that is open for petroleum activities, are characterised by de facto non-Arctic climate conditions

In this context it is important to note that petroleum activities on the northern part of the Norwegian Continental Shelf currently take place in areas that are comparable to more southern parts of the Norwegian waters, and although the environmental and operational regulations are strict and fact based, they are not defined by the more northern location. The industry uses its vast experience of over 60 years on the Norwegian Continental Shelf to maximize safe and sustainable operation.



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Annex:

Additional information regarding Offshore Norge’s input to the update of the EU Arctic Policy

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The Arctic

There are many “Arctics”, and the European Arctic is different from the North American or the Russian Arctic, not the least regarding climatic and operational conditions, due to the warm waters of the North Atlantic Current, also called the Gulf Stream. The Arctic Monitoring and Assessment Program – AMAP – clearly points out the diverse characteristics of the Arctic:

“The Arctic is often delimited by the Arctic Circle (66°32’N), which approximates the southern boundary of the midnight sun. Such a definition, however, is simplistic, given variations in temperature, presence of mountain ranges, distribution of large bodies of water, and differences in permafrost occurrence. The terrestrial, freshwater and marine environments throughout this area exhibit considerable variation in climate, meteorology and physical geography.

The marine boundary of the Arctic is situated along the convergence of cool, less saline surface waters from the Arctic Ocean and warmer, saltier waters from oceans to the south. The warming effect of the North Atlantic Current (warm waters transported from the Gulf of Mexico) deflects this boundary north of 80°N west of Spitsbergen.”

Oil and gas production in the Norwegian Arctic

Norway is currently providing EU with stable and reliable supplies of oil and gas from its continental shelf, including gas in pipelines from the Norwegian Sea and Liquefied Natural Gas (LNG) transported by ship from the Barents Sea. A map of producing fields is shown below, with Johan Castberg in the Barents Sea being the most recent field put into production. The field started production in 2025 with an expected lifetime of more than 30 years. Production from the Snøhvit field started in 2007 through the onshore facilities at Hammerfest LNG plant. In 2025 the owners of the field made major investments to prolong the production lifetime and to reduce CO₂ emissions through electrification of the production plant. In the same area, the fully electrified Goliat field is producing with close to zero CO₂ emissions. That field is expected to produce oil and gas towards the second part of the 2040s.

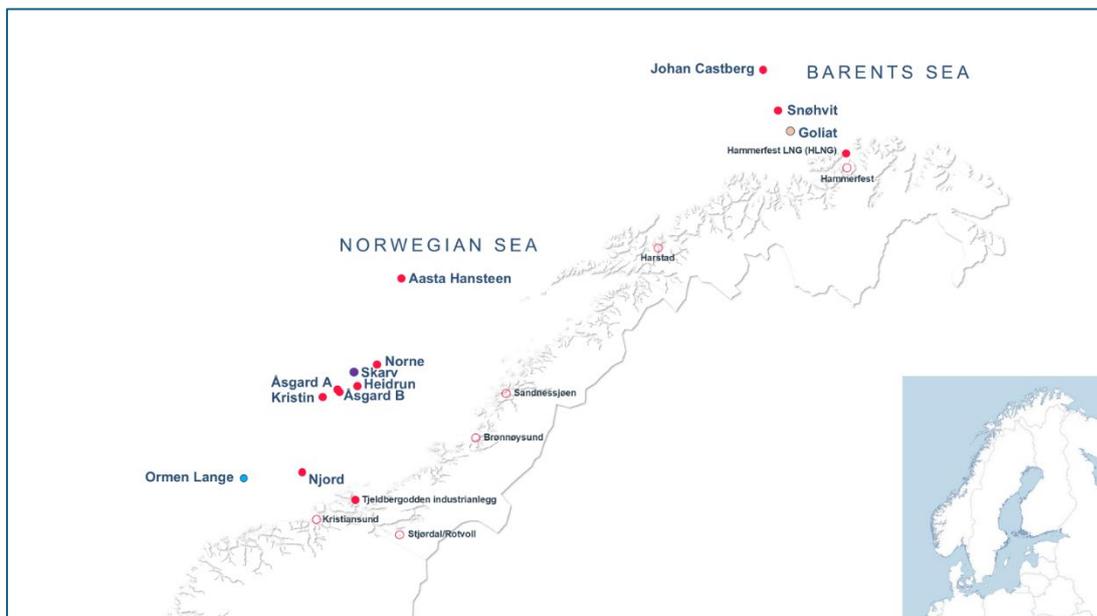
Drilling of wells is an integral part of oil and gas operations. This includes drilling of production wells to get oil and gas out of the ground. It includes exploration and appraisal drilling to optimise the production from existing fields, and drilling of wells to prove near-field resources that will be produced through the existing facilities at lower costs than through new fields. Exploration wells in contiguous areas or new areas are drilled to prove up new resources to

maintain the activity in an area, or to maintain or increase the production levels in a basin, region or country.

All operations in the Norwegian Arctic take place in areas that are ice-free year-round and are performed within strict environmental and safety standards and regulations, including extensive environmental monitoring programs. It is anchored in democratic governance through parliamentary approval under the Norwegian Petroleum Act, and regulatory oversight by independent authorities. It is carried out with a significantly lower environmental footprint than the global average due to high environmental and safety standards, electrification of installations, and methane emissions mitigation.

Operators in the Barents Sea cooperates on logistics, contingency and other issues related to operations in the north through the industry cooperation *BASOP*. As part of the cooperation, *BASOP Security* was established in 2023 with the objective to address security issues through the entire value chain, involving both local communities and authorities, the police and the military. *BASOP Security* has facilitated closer cooperation and a better common situational understanding between the different actors through meetings, seminars and tabletop exercises on how to handle different threat scenarios.

Petroleum activity in North Norway provides substantial industrial activity which employs thousands of people in the region, contributing to sustainable of local societies and settlements. A recent report² estimates a current employment effect of about 4500 people in North Norway from the six northernmost oil and gas fields. This includes 150 small and medium sized enterprises (SMEs) which make up the bulk of the service and supplier industries in the region, located all the way to the Russian border in the East. These SMEs are also important employers for the Norwegian indigenous population.



Map of oil and gas fields in the Norwegian Sea and the Barents Sea (colours indicating different operating companies)

² KPB (2025): <https://www.levertrappporten.no/om-levert>

Norway's National Security Strategy (2025) identifies secure energy deliveries as Norway's most important contribution to European security and underscores the need to protect and rapidly restore critical energy infrastructure in close cooperation with allies. By reducing the need for importing energy from non-democratic third countries, the Norwegian energy supply contributes to Europe's strategic autonomy and independence. This is, as Commission President Ursula von der Leyen highlighted in her State of the Union speech in September 2025, a key priority for European security.

A long history of responsible development

The oil and gas industry on the Norwegian continental shelf has been guided by the principles of responsible development of natural resources from its inception more than 60 years ago.

Norwegian authorities adopted a step-by-step approach, opening for hydrocarbon development only gradually. This ensured that the industry had time to mature its experience and know-how by the time the Barents Sea had its first gas and condensate field (Snøhvit) set in production in 2007.

Our member companies have embraced the dedicated framework conditions and enhanced operational requirements in the Arctic. The companies have cooperated closely with the authorities and applied thoughtfulness, care for the environment, and scientific due diligence in project development. Examples:

- Pro-actively engaging to understand and mitigate any environmental impact based on facts and by working with science.
- Developing robust supplier network locally and regionally for positive societal impact.
- Train and strengthen the quality of the supply chain to for best health, safety, security and environmental (HSSE) practices.
- Continuous efforts to reduce greenhouse gas emissions from production has led to the NCS being one of the regions in the world with lowest carbon footprint from production³
- Facilitating the interaction with robust governance, including supporting Arctic industries' response to the Arctic Council establishing the Arctic Economic Council.
- Establishing long term collaboration with scientific institutions and universities on Arctic related matters.
- Initiating collaboration with other activities in the Arctic including oil spill preparedness programs and working with Arctic fisheries.

In sum this gives the Norwegian oil and gas industry players an unparalleled experience in operating in Arctic waters, and strong legitimacy and credibility in commenting upon the continuation of these activities and the new challenges.

³ 6 kg CO₂e/boe (Rystad Energy, 2026) and methane intensity 0.01% (Offshore Norge, 2025)

The role of the Norwegian Arctic for the EU's energy security and competitiveness

The 2021 Arctic Strategy highlights that the EU is an importer of oil and gas extracted in the Arctic, but it points only to the fact that in 2021 a large share of the EU gas import was in the form of LNG – liquefied natural gas – produced in the *Russian Arctic*. As discussed above, large volumes of oil and gas to the EU comes from the Norwegian Arctic. So, when the 2021 Strategy maintains that *“the Commission shall work with partners towards a multilateral legal obligation not to allow any further hydrocarbon reserve development in the Arctic or contiguous regions, nor to purchase such hydrocarbons if they were to be produced”*, this does not appear to align with the current practises nor the political priorities of the von der Leyen II Commission.

Norway currently supplies around one third of the EU's natural gas demand, and in 2025 34 % of this volume originated from the Norwegian Sea and the Barents Sea – a share expected to rise to 50 % in a few years. Thus, translated to the 2026 political reality, unless the policies are modified, this means that the EU risks disrupting further supply of oil and gas representing a significant part of today's total imports, despite this gas being among the lowest-emission sources of fossil fuels in the world and delivered by a reliable partner at competitive terms with other sources of imports.

It is a geopolitical reality that the **EU's competitiveness** is under strong pressure from other major economies like the USA and China. Safe and secure access to the energy that the European industries need is becoming a prerequisite for competitiveness. Oil and gas from the Norwegian Arctic play an important and integral role in this picture.