

Input from Offshore Norge to the EU Commission's call for evidence on revision of the EU's energy security framework

13th October 2025

We welcome the Commission's initiative to review the EU's energy security framework. 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 hydrogen.

For over 50 years, European energy from Norway - oil, natural gas and renewable electricity - has been reliably delivered through offshore infrastructure and underpinned stable, competitive industrial partnerships. As Europe together transitions towards climate neutrality, the Norwegian offshore industry will contribute to the EU's climate, energy security, and competitiveness ambitions – ensuring predictable energy supplies with low emissions, while advancing, CCS, offshore wind technologies and hydrogen.

European oil and natural gas from the Norwegian continental shelf have production and transport emissions amongst the lowest in the world. Continued access to such supply of energy is essential in responding to the expected demand as forecasted by the European Commission in the impact assessment to the EU's 2040 climate targets and will only be possible with further exploration and development of oil and gas reserves on the Norwegian continental shelf. Long-term demand commitments would help incentivize the necessary development of such long-term energy resources.

The geopolitical climate underlines the need for partnerships between those who safeguard political stability, transparent governance, a strong rule of law, and a conviction that the climate crisis must be addressed. Europe has already suffered from Russia's war on Ukraine and weaponization of natural gas supply, and the ongoing trade war is again putting European consumers in a vulnerable position. Europe should therefore make full use of its energy potential as this contributes to the economic resilience of the continent.

The primary objective of the review should be to adapt existing tools by reducing complexity and increasing flexibility. A future-proof framework must remain pragmatic, operational, and able to support the energy transition while safeguarding the availability of reliable and affordable energy.

Offshore Norge's recommendations for the review are the following:

- **Ensure a predictable regulatory environment that does not impose undue risks or costs on producers or consumers.** This will safeguard both energy security, competitiveness and price predictability in the EU.
- **Remove barriers to energy trade and ensure sufficient import infrastructure rather than distorting market choices.** Well-functioning markets are the best guarantee of resilience even under extreme circumstances, and future measures should build on the market strengths while remaining pragmatic and forward-looking.
- **Following up the recommendations for EU policymakers in Mario Draghi's Report on the Future of European Competitiveness (2024), to develop a long-term framework for natural gas during the green transition.** Natural gas is a key enabler of the energy

transition supporting the integration of renewable energy sources by providing flexible and reliable back-up capacity.

- **Favor long-term partnership with countries like Norway, who stand with the EU in protecting democratic principles and advancing the energy transition.**
- **Carry out joint crisis preparedness exercises between EU/EEA Member States, industry, and NATO** to anticipate and manage cross-sectoral risks, ensuring a coordinated response that safeguards security of supply under stress scenarios. Planning and preparation to respond to incidents and recover services is key to developing resilience. Efforts should be prioritized around a common understanding of critical assets.
- **The European Commission should provide practical guidance on implementing EU security, cybersecurity and digital regulations**, aligning them with international standards and existing national regulations.

For further details we refer to the input from IOGP Europe.

The logo for Offshore Norge, featuring three stylized blue wavy lines above the text "OFFSHORE NORGE" in blue capital letters.

Best regards,
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