OFFSHORE NORGE
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EUROPEAN COMMISSION
Submitted via the Have Your Say portal
02 November 2026

Feedback on the proposed amendments to the EU MRV Regulation and the FuelEU Maritime Regulation

Offshore vessels and offshore operations | COM(2026) 620

1. Introduction and scope of the response

Offshore Norge represents companies operating on the Norwegian continental shelf and supplier companies that procure and provide maritime services. This response is limited to issues concerning offshore vessels and offshore operations.

Offshore Norge supports the objective of consistent emissions reporting and a more integrated data chain for the EU Monitoring, Reporting and Verification framework (EU MRV), the EU Emissions Trading System (EU ETS) and FuelEU Maritime. We welcome the proposed move from a static list of offshore vessel types to an activity-based scope and the greater reuse of monitoring plans, MRV reports and verification across the regulatory frameworks.

The final framework should nevertheless provide an unambiguous and practicable scope. It should identify the activities, voyages and energy quantities covered, the responsible entity, and the boundary between maritime reporting and reporting from offshore installations. An extension of EU MRV should not indirectly extend the material scope of FuelEU Maritime.

2. Executive summary

Offshore Norge supports the proposed activity-based approach and a common data chain. Before the legislation applies, the Commission should clarify overlapping provisions and cross-references, establish binding system boundaries between ships and offshore installations, operationalise the concepts used for offshore activities, preserve the distinction between EU MRV and FuelEU Maritime, enable reuse of verified data and sustainability evidence, and ensure that guidance, templates and IT systems are ready and tested. The framework should be capable of consistent and timely application throughout the EEA.

3. Offshore Norge's main recommendations

- Retain an activity-based scope for offshore vessels and align all relevant provisions, definitions and cross-references before adoption.

- Issue harmonised guidance, including representative examples, for ordinary transport, offshore operations, supporting activities, transit, mobilisation and demobilisation, standby, weather waiting, port stays and mixed assignments.

- Establish clear and binding system boundaries based on the principle of one energy quantity, one responsible entity, and one regulatory regime.

- Clarify the treatment of mobile drilling units, jack-up units, FPSOs, FSOs, accommodation units and other mobile offshore units by reference to their primary function and any existing reporting or EU ETS treatment as installations.

- An extension of EU MRV coverage should not, in itself, extend the material scope of FuelEU Maritime. Any extension of FuelEU obligations should be expressly provided for in the FuelEU Maritime Regulation

- Provide consistent, traceable, and reusable sustainability and mass-balance documentation across FuelEU Maritime, EU ETS and the Renewable Energy Directive.

- Coordinate the implementation timeline and ensure that supplementary acts, guidance, reporting templates, examples and IT systems are finalised and tested before the first monitoring year and before financial obligations take effect.

- Ensure functional, predictable, and symmetrical application throughout the EEA, including access to relevant reporting systems for companies and accredited verifiers.

4. Activity-based scope for offshore vessels

Offshore Norge supports deleting the exhaustive list of ship types and linking the scope to whether a ship performs or supports offshore operations at an offshore worksite. This is better suited to multipurpose vessels and to new vessel and activity types than classification by ship type.

The relationship between the proposed provisions must, however, be fully coordinated before adoption. Definitions and cross-references should be reviewed so that parallel or overlapping rules do not create uncertainty for offshore vessels.

The Commission should develop harmonised practical guidance. It should show how each activity phase is classified and when it starts and ends. Representative examples should cover ordinary transport, support activities, work at an offshore worksite, transit, standby and weather waiting, mobilisation and demobilisation, port stays, mixed assignments and multipurpose vessels. For mixed assignments, the framework should permit classification by voyage or operational phase.

5. System boundaries between ships and offshore installations

The risk of overlap between maritime reporting and reporting from offshore installations is particularly relevant for mobile drilling units, jack-up units, FPSOs, FSOs, accommodation units and vessels working in close integration with an installation. Rules and practical system-boundary diagrams should be available before the framework takes effect.

A floating or mobile offshore unit should not automatically be treated as a ship solely because it has its own propulsion or can be relocated. The assessment should reflect the unit's primary function and whether its emissions are already covered by reporting or EU ETS obligations as an offshore installation.

Fuel bunkered by a vessel but demonstrably delivered onwards to an offshore installation or another energy consumer should not form part of the vessel's own fuel consumption or emissions basis. The same emissions should not be reported, priced, or verified twice.

6. Operational criteria for offshore worksites and mixed assignments

The terms "performing offshore operations", "supporting offshore operations" and emissions "closely related" to such operations require common operational criteria. For "performing", the relevant test should be whether the vessel's crew or equipment carries out the actual work at an identified offshore worksite.

"Supporting" should require a direct, specific and documentable functional link to a particular offshore operation. A general commercial connection to offshore activity should not be sufficient.

For port emissions, "closely related" should require that the emissions-generating activity is directly necessary or relevant to the mobilisation, execution or demobilisation of an identified offshore assignment. The assessment should be based on purposive, functional, and temporal proximity and be documentable through work orders, cargo lists, sailing plans, or deck logbooks.

The framework should clarify whether an offshore worksite corresponds to an entire permit area or to a narrower operational zone. Permit areas, operational work areas and other relevant geographical boundaries should be identifiable, verifiable and available in a digital, machine-readable format. The approach must also work for operations in third countries, where permits and coordinates may not be publicly available to the shipping company.

In addition, the common criteria and guidance should specify how the following situations are to be classified:

- the boundary between cargo or passenger transport and offshore operations, including supply voyages with multiple purposes;
- transit, standby, weather waiting, port stays and relocation between installations;
- changes in contractual or operational responsibility, and assignments for multiple customers;
- short or marginal offshore assignments, including whether simplified reporting is appropriate; and
- rescue operations, well control, authority-mandated emergency preparedness and other safety-critical activities.

7. Interaction between EU MRV, EU ETS and FuelEU Maritime

Offshore Norge supports one monitoring plan, one MRV report, and coordinated verification. Data collected and verified under EU MRV should be reused in EU ETS and FuelEU Maritime wherever the requirements overlap. Operators should not have to report or verify the same information twice.

At the same time, EU MRV coverage and FuelEU Maritime obligations must remain legally and technically distinct. A vessel may be subject to EU MRV without being subject to FuelEU Maritime's greenhouse-gas intensity requirements. This distinction should be reflected in the legislation, guidance, data model, and user interfaces.

The implementation timelines should also be coordinated. Under the current framework, offshore vessels are expected to enter the EU ETS in 2027, while the timing of the proposed activity-based model remains uncertain. Requiring operators to implement the current reporting logic for a short period and then change scope, methodology and systems would create unnecessary complexity. The Commission should coordinate the transition so that industry and verifiers can prepare a stable model.

More broadly, parallel obligations should not cause double reporting, double economic treatment, or conflicting incentives for the same emissions. The framework should support consistent and timely applications throughout the EEA, including equivalent functional access to reporting systems and databases for relevant companies and accredited verifiers.

8. Sustainability documentation and mass balance

FuelEU Maritime relies on lifecycle emissions and recognised evidence when actual values are used for biofuels, biogas, renewable fuels of non-biological origin and recycled carbon fuels. A vessel using a sustainability characteristic must have a traceable and verifiable documentation chain.

The Commission should facilitate consistent documentation and mass-balance arrangements across FuelEU Maritime, EU ETS, and the Renewable Energy Directive. The responsible company and verifier should have access to the evidence needed for compliance, and the same approved documentation and audit should be reusable where requirements overlap. This would maintain safeguards against double counting while avoiding parallel controls and supporting traceability and a level playing field in the EEA market.

9. Implementation timeline, guidance and IT systems

Supplementary delegated and implementing acts should be developed in close dialogue with the offshore industry. The necessary acts, sector guidance, reporting templates, practical examples, and IT solutions should be finalised and tested well before the first monitoring year.

Early testing should cover representative vessel types, mobile offshore units, mixed assignments, cross-border operations and the interaction between maritime and installation reporting.

10. Concluding recommendations

Offshore Norge encourages the European Commission, the European Parliament and the Council to retain the activity-based direction of the proposal while ensuring that the final legal text is clear, internally consistent, and practically implementable. The central safeguards should be unambiguous system boundaries, a clear distinction between EU MRV and FuelEU Maritime obligations, reuse of verified information, interoperable sustainability documentation and a coordinated transition to a stable reporting model.

The framework and its technical solutions should support consistent and timely applications throughout the EEA.

Yours faithfully

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