



## Ministry of Petroleum and Energy

kunnskapsinnhenting@oed.dep.no

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## CONSULTATION COMMENTS TO THE KNOWLEDGE ACQUISITION ON EFFECTS OF PETROLEUM ACTIVITY IN THE NORTH-EASTERN NORWEGIAN SEA

Reference is made to the invitation from the Ministry of Petroleum and Energy, soliciting comments to the technical work conducted in the Knowledge Acquisition on effects of petroleum activity in the north-eastern Norwegian Sea. Idemitsu Petroleum takes no exception to the hearing comments made by Norsk olje og gass in this respect and would like to emphasise that:

- The north-eastern Norwegian Sea is presently ready for an impact assessment pursuant to the Petroleum Act. This will allow the Storting to balance the various interests and decide whether to open the area for petroleum activity.
- The completion of the Knowledge Acquisition represents an important milestone. Never before has such an extensive amount of technical documentation been available prior to a potential opening process for a sub-province on the Norwegian Continental Shelf. The thoroughness of the work is significant and commendable, and most areas of importance related to the matter of petroleum activity have been considered.
- The Knowledge Acquisition documents that the north-eastern Norwegian Sea does not exhibit notable differences from other areas on the Norwegian Continental Shelf where petroleum activity is conducted today. This was also the conclusion of the Minister of Petroleum and Energy when the Knowledge Acquisition reports were presented in Svolvær on the 23<sup>rd</sup> of November 2012.

Without questioning the intentions of the proponents of the concept of a "petroleum-free" northeast Norwegian Sea, it should be mentioned that this is indeed a misnomer, as it has been for years. Several times weekly, tankers transporting crude oil cargoes of Russian origin sail along the Norwegian coast. In addition to the implemented ship traffic separation systems and move of ship lanes for such "risk traffic", Idemitsu opines that potential synergies offered by responsible and safe petroleum activity will also be important for a further improved and effective oil spill protection and preparedness in the north-east Norwegian Sea.

Yours sincerely,

Teruyuki Takahashi Managing Director

Idemitsu Petroleum Norge AS

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