

# IOGP written input to the consultation “International Ocean Governance”

## Introduction

The International Association of Oil & Gas Producers' (IOGP) member companies account for approximately 90% of the oil and gas produced in Europe. IOGP shares the world's ambition to reach the Paris Agreement's goals and supports the EU's objective of climate neutrality by 2050 upon the implementation of enabling measures.

Oceans and seas are important areas of operations for the European Oil and Gas industry, as more than 80% of current oil and gas production takes place offshore. To protect the marine environment, exploration, drilling and production are conducted according to the highest industry standards and in line with the applicable EU legislation.

IOGP also has access to a wealth of technical knowledge and experience with its members operating around the world in many different ocean governance frameworks, supporting goals of the 2030 Agenda for Sustainable Development, and in particular the sustainable development goal on the ocean (SDG14).

We welcome this early opportunity to share our input. In responding to the Commission's consultation on the International Ocean Governance, because of the limitations of the questionnaire format, we would like to share some of our observations in this written submission.

While assessing the International Ocean Governance, the following aspects should be considered:

### 1. A stable, predictable and transparent regulatory framework

A stable, predictable and transparent regulatory framework in the EU seas and international oceans is essential to the planning and conduct of energy projects and especially energy projects (oil and gas and wind energy). Such oil and gas projects involve long-term planning (5-20 years) and involve significant investment (multi-millions/billions of euros). This encompasses technical requirements, permitting, as well as visibility on financial terms.

Regulations applicable to oceans and seas are set by variety of different actors (UN, EU, Regional Conventions, national and regional regulators). This inadvertently leads to differences in regulations across the globe as they are written by different people of different background. To follow and maintain these large volumes of regulations requires a lot of resources. Therefore, we believe that having the same requirements on a global basis with the necessary regional adaptations to the prevailing conditions at specific location would be more efficient.

**For that reason, we continue to support initiatives that aim at a more efficient coordination ensuring closer cooperation between all organizations involved in ocean affairs, internationally and regionally.**

**At the same time, we are supporting the EU efforts towards harmonization of the different assessment methods, that are taking into account regional ecological specificities ensured by the work in regional frameworks such as the Regional Sea Conventions.**



Moreover, we would like to stress that it is essential to involve all relevant stakeholders in a transparent and inclusive consultation process throughout the policy making process.

## 2. Importance of Strategic Environmental Assessments (SEAs)

The SEAs are assessment tools which can aid sector-wide planning, area-based planning, and the formulation (or revision) of governmental policies or strategies, as well as large-scale or nation-wide programmes. Oil and gas companies are often involved in SEA's because of the size and nature of the projects during decision-making process or as an affected stakeholder in the public consultation phase. In contrast to environmental (and social/health) impact assessments of individual projects, SEAs provide a broader, high level framework for identifying and evaluating potential environmental and social impacts related to government policies, strategies and programmes.

**We call for a full implementation of the SEA framework at international and national level as we believe these assessments are a very important tool in terms of stability of the regulatory framework that provides a consultation opportunities at the very early stage when potential uses of ocean or sea area are being assessed and a key stage of the licensing and permitting processes.**

## 3. Industry and science collaborations

We believe that there should be more opportunities for exchange of views and information on the EU and international level regarding the ocean science among various stakeholders (regulators, industry and civil society). Moreover, the outcomes from these discussions could be better used and reflected in the regulatory framework. The oil and gas industry is already involved in a number of ocean governance initiatives (outlined in Annex I) and research projects with a combined budget of more than €60 million (outlined in Annex II). Some of these collaborations should be used for more informed, and science-based policy making (e.g. assessment of impacts on marine populations could contribute to better policy regarding the underwater sound in line with the requirements of the Marine Strategy Framework Directive(2008/56/EC) and Good Environmental Status Decision (EU/2017/848)).

We also believe that it is very important to share data and develop other initiatives aiming at building open databases of scientific information at the international level similar to European Marine Observation and Data Network (EMoDNet), European Directory of Marine Environmental Data (EDMED), or EU-funded Atlas or iAtlantic projects.

**We stand ready to share the outcomes of our projects and the gathered data and experience collected by our researchers throughout the decades.**

**Given the above, we would like to encourage the European Commission to engage in a meaningful dialogue with the industry and science collaborations, establish more EU and international level open data basis and in general create more opportunities between policy makers, industry and researches to exchange views and information.**

## Final Remarks

IOGP would like to stress the importance of inclusive and transparent dialogue with all relevant stakeholders when seeking solutions for the International Ocean Governance aiming to build a stable regulatory framework. The industry and science collaborations should play an important role in this process.

The oil and gas exploration and production industry recognises the need to develop consistent databases and records in certain fields. The IOGP's members are encouraged to use the guidelines as a starting point for their operations or to supplement their own policies and regulations which may apply locally. We also continuously work to further improve the sustainability of our operations.

We look forward to cooperating with all the relevant stakeholders, sharing our experience, knowledge regarding the ocean research and policy framework, and the outcomes of our many projects (Annex II).

## ANNEX I: Oil&gas engagement in the ocean governance initiatives

- International Ocean Governance Forum
- 2020 UN Ocean Conference
- UN Decade of Ocean Science For Sustainable Development (2021-2030)
- UN Global Compact: Blue Resilience Brief
- UN Global Compact: Sustainable Ocean Principles
- UN Global Ocean Treaty on Marine Biodiversity of Areas Beyond National Jurisdiction (BBNJ)
- UN Sustainable Ocean Business Action Platform

## ANNEX II: Collaboration of industry and science

Several good examples of industry and science collaborations to collect data and scientific research projects.

- **Atlantic Frontier Environmental Network** – established to collect data in Atlantic Margin area with large scale regional environmental surveys undertaken to North and West of Scotland in 1996 and 1998 – collaboration between government, academic and industry scientists and representatives.
- [ATLAS project](#) – The ATLAS consortium consists of 12 universities, 5 small and medium-sized enterprises (SMES), 3 government agencies and 4 national research centres and focuses on the trans-Atlantic assessment and deepwater ecosystem based spatial management plan.
- [E&P Sound and Marine Life Joint Industry Programme](#) – aims to increase understanding of how the sounds generated by oil and gas exploration and production activity – especially by seismic surveys – can affect marine life.
- [Environmental Genomics Joint Industry Programme](#) – set up to coordinate research aimed at exploring the application of eDNA-based analyses in environmental assessments and monitoring of oil and gas offshore and onshore operations.
- [iAtlantic project](#) – iAtlantic consists of 33 scientific partners and 11 international associate partners aiming to deliver integrated assessment of Atlantic marine ecosystems in space and time.
- [Offshore Angola and Congo](#) - regional environmental baseline and monitoring surveys, and deep-water observatory – collaboration between industry scientists and academia. Study of deep-sea environments on the Angola-Congo margin and in the abyssal zone.
- [SERPENT project](#) – the “Scientific and Environmental ROV Partnership using Existing iNdustry Technology” (SERPENT) project aims to make cutting-edge industrial Remotely Operated Vehicle (ROV) technology and data more accessible to the world’s science community, share knowledge and progress deep-sea research. The programme interacts with science and conservation groups globally to communicate the project to the public, increasing the awareness of the fragile marine resources.

**Registered Office:** City Tower, Level 14, 40 Basinghall Street, London EC2V 5DE, United Kingdom  
T +44 (0)20 3763 9700 / [reception@iogp.org](mailto:reception@iogp.org)

**Brussels Office:** Avenue de Tervuren 188A, B-1150 Brussels, Belgium  
T +32 (0)2 790 7762 / [eu-reception@iogp.org](mailto:eu-reception@iogp.org)

**Houston Office:** 15377 Memorial Drive, Suite 250, Houston, TX 77079, USA  
T +1 (713) 261 0411 / [reception@iogp.org](mailto:reception@iogp.org)

[www.iogp.org](http://www.iogp.org)  
[www.oilandgaseurope.org](http://www.oilandgaseurope.org)