

IOGP input to European Commission call for evidence on 'setting the course for a sustainable blue planet, an update of the international ocean governance agenda'

Introduction

The International Association of Oil & Gas Producers¹ (IOGP) supports the goals of the Paris Agreement and the EU's ambition to reach climate neutrality by 2050. We recognise that there are many challenges on the road to meet this objective as the energy transition will require significant investments, new technologies, effective policies and behavioural changes.

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 at the highest industry standards and in accordance with applicable international conventions, national laws and EU legislation.

In line with the UN Sustainable Development Goals, we all share the responsibility to manage the oceans in a sustainable way. The energy industries share this responsibility while supplying the EU with the energy it needs. 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 opportunity to share our input.

In assessing International Ocean Governance, and taking into account the recommendations from the EU International Ocean Governance Forum, we believe that the following considerations are important:

1. A coherent, predictable and transparent regulatory framework

Energy projects, including those involving oil and gas, involve long-term planning (5-20 years) and involve significant investment (multi-millions/billions of euros). Therefore, a stable, predictable and transparent regulatory framework in the EU seas and international oceans is essential to the planning and conduct of energy projects. We believe there are several key elements involved:

- Regional ecological specificities should be carefully considered in EU efforts to harmonise different assessment methods. This can be ensured by taking into account the valuable work taking place in regional frameworks such as the Regional Sea Conventions
- Consistency in management of marine protected areas and aligned approaches to ecosystem restoration
- Alignment, coordination and integration between policy frameworks for different sectors, especially for emerging industries such as CCUS and deployment of offshore electrification infrastructure
- There should be consistency of governance in different jurisdictions, as this will ensure greater legal certainty and a more predictable framework

¹ The International Association of Oil & Gas Producers' (IOGP) member companies account for approximately 90% of the oil and gas produced in Europe

- Data transparency and the role of science should be afforded due importance
- There is a need for clarity as to technical requirements, permitting and financial terms
- The green transition can be supported by increasing research and awareness regarding application and development of innovative technologies

2. Importance of Strategic Environmental Impact Assessment

In contrast to environmental (and social/health) impact assessments of individual projects, Strategic Environmental Impact Assessment (SEA) provides a broader, high-level framework for identifying and evaluating potential environmental and social impacts related to government policies, strategies and programmes. This is also aligned with the Better Regulation principles, which promote strategic foresight. Oil and gas companies are often involved in SEAs because of the size and nature of the projects during the decision-making process or as a relevant stakeholder in the public consultation phase. We would like to emphasise the importance of the following:

- There is a need for integrated and more strategic environmental and social impact assessments that consider all sectors and interests and underpin marine spatial planning
- We call for a full implementation of the SEA framework at international and national level as we believe these assessments are an important tool for stability of the regulatory framework
- SEAs provide consultation opportunities at the very early stage when potential uses of ocean or sea area are being assessed, and represent a key stage of the licensing and permitting processes

3. Industry and science collaboration

Oil and gas will still be important energy sources for decades yet to come and can be produced with high environmental standards in many parts of the world's oceans. The technologies developed in this sector will be decisive for the development of other ocean energy sources, for the development of new industrial sectors at sea, and for modernization of current industries. We would like to highlight the following:

- 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

Final Remarks

We share the ambition set out at the EU International Ocean Governance Forum to aim for an ocean that is clean and healthy, resilient, productive and understood. We would like to encourage the European Commission to engage in a meaningful dialogue with the industry and science collaborations, to establish more EU and international level open databases and in general to create more opportunities between policy makers, industry and researchers to exchange views and information.

Furthermore, we are committed to continuously working on further improving the sustainability of our operations, and we would gladly share the outcomes of our projects and the gathered data and experience collected by our researchers throughout the decades.

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 and gas industry 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: Examples of collaboration between the oil and gas industry and science

- 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
- [INSITE](#) – to better understand the influence of man-made structures on the marine ecosystem in the North Sea (Phase 1 funding by Oil & Gas UK, and Phase 2 funding by UK NERC with in-kind support from Oil and Gas industry)
- [Rigs to Reefs](#) – This project focuses on the value of offshore oil and gas installations as important habitats for marine life and ecosystems
- [IUCN WGWP](#) – (IUCN Western Gray Whale Advisory Panel) - Since 2004, IUCN has worked with Sakhalin Energy (an oil and gas company) with Gazprom, Shell, Mitsui and Mitsubishi as shareholders, and other actors to ensure the long-term conservation of the western grey whales. Over the course of time, other companies have joined the monitoring program. In 2022, the developed approaches and overall lead and oversight of the conservation efforts are being transferred to the Russian Federation government.

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