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Sendt: 01.03.2024 15:45:42
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Tittel: 2023/1318: Comments on Consultation note

Sie erhalten nicht oft eine E-Mail von ruediger.urhahn@siemensgamesa.com. [Erfahren Sie, warum dies wichtig ist](#)

EXTERNAL SENDER

To whom it may concern:

Dear Madam or Sir,

Siemens Gamesa Renewable Energies (SGRE) is the worlds leading provider for offshore wind farm solution and offshore floating solutions.

We provide wind turbines and integrated solutions to large scale offshore wind farms to all markets around the globe.

Since many years SGRE drives innovations for the industry and has contributed significantly to increase level of safety, environmental safety, quality, reliability and performance of large scale offshore wind turbines for bottom fixed installation and for floating installation. Most recent developments reach out to integrated hydrogen application.

SGRE has also contributed significantly into developing technical solutions for offshore wind floating application for Norwegian project in close cooperation with most renown and qualified Norwegian industry partners.

SGRE appreciates the efforts of Norwegian industry and authority consortia to develop regulation, adjust legislation and provide effective guidance to the industry.

SGRE has a high interest to contribute to further development of the local guidance.

In that context we may provide insights about industry best practice and standards prevailing in industry and where these may have an implication to cost.

Within SGRE we are aligning with colleagues from other Siemens Energy branches that are located in Norway.

Our aim is to find a good set up that allows for transparent and direct cooperation with local Norwegian industry players and related authorities.

This with the ambition to drive safe and viable solutions for the development, installation and operation of offshore wind farms in Norwegian waters.

Below we provide some high level comments on the recently published consultation note for your consideration.

We are looking forward to receiving feedback and information on next activities.

It would be much appreciated if you could let us know, how we may involve ourselves further.

Please feel free to contact Rüdiger Urhahn at the given email or phone number at any time for questions or clarification.

Thank you very much for providing us the chance to comment.

Comments on Consultation note on proposal for regulating safety and the working environment for renewable energy production at sea.

It is highly recommended to make reference to specific standards for offshore wind (IECRE / IEC) to have a minimum of standards set for a best practice driven industry that safeguards safety.

The authority is reserving the right to comment and provide feedback for reaching consent, it is not clear to what extent this can become binding and consequently force the developer to ultimately adjust the design. Such a commenting can come very late in projects, when design is already well developed and critical investment decisions might have been taken. Late reworking of design will come at high cost and might actually drive towards commercially not feasible solutions.

It is not clear, to what extent IECRE / IEC or EN standards are for installations in Norway considered equivalent to Norsok or DNV standards. Offshore wind industry usually follows internationally accepted IECRE / IEC standards and has developed qualified and certified industry solutions at a high safety level specified for the industry.

Driving a need for modification of prevailing designs to locally preferred standards other than basic industry standards should be avoided. This will help to avoid a need to redesign substantial parts of the turbines at high cost. Even the need to show or demonstrate that an IECRE / IEC based solution is equivalent to Norsok or DNV standard will drive significant efforts and ambiguities. Cost for wind farms may be driven into regions that are no longer viable for business.

Working environment:

The turbine is no working environment.

Only occasional maintenance work will be performed on turbines. Staff will only stay on board of turbines for few hours up to a day, exception might only apply during emergency conditions. The working environment requirements definitions needs to be adjusted accordingly. They need to allow for such maintenance considerations and must not drive the standard on turbines well beyond what is needed. International best practices must be considered and will well cover the safety needs. The proposal is not explicit in this regards and needs to be reworked in order to provide clear, explicit guidance to industry for enabling a common standard for local windfarm solution that serves the maintenance aspect of the work to be performed on turbines. Modification of turbines for meeting excessive working environment standards will drive to substantial redesign and extra installations of equipment at high cost for actually no explicit benefit. Please note that maintenance staff executing the maintenance work on such turbines is highly qualified and well trained and educated for working in that environment.

It is required that the relevant authorities make available formal translation of applicable legislation in order avoid different interpretation from false uncontrolled translations. For

offshore wind industry multiple parties will cooperate with each other, if all have to work with different uncontrolled translation, massive misunderstanding and risk resulting from that can be the consequence.

Best regards

Ruediger Urhahn
Head of project certification & local regulations



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