

**Brevdato** 09-04-2021

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**Ansvarlig** Tor Søltoft

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**Dokumenter uden PDF-version (ikke vedlagt)**

**Udskrevet** 15. jun 2021

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**Til:** Import/Eksport (postkasse) (impeksp@mst.dk)  
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**Sendt:** 09-04-2021 15:55

Due to an ongoing enquiry and prequalification of Norwegian bidders for third party waste water treatment, we have received information from SAR (prequalification only).

SAR, together with other bidders, has received information about the content of the waste water. I can confirm that we have received prequalification answer from SAR. The process is still confidential, and I will come back with further information as soon as this is available.

Best regards,  
Anne Kolstad Morken

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**Fra:** Import/Eksport (postkasse) <impeksp@mst.dk>  
**Sendt:** mandag 22. mars 2021 10:14  
**Til:** Hanne Seljelid <hasel@equinor.com>; Anne Kolstad Morken <akmo@equinor.com>  
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**Emne:** NO 500083 Supplerende partshøring (MST Id nr.: 2620920)

### **Notifikasjon NO 500083**

Til Equinor Asa Avd Raffineri Mongstad  
Att. Hanne Seljelid og Anne Kolstad Morken  
E-mail: [hasel@equinor.com](mailto:hasel@equinor.com), [akmo@equinor.com](mailto:akmo@equinor.com)

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At the 23rd of november 2020, we informed you of an issue with this notification, and of it being cause for objection. The opinion was preliminary.

In your letter of 11th of january this year, you presented your documentation of the capacities of different treatment facilities in Norway. We have assessed this information, and we have subsequently received additional information regarding the capacity for waste water treatment in Norway, specifically at SAR Mongstad. Please see description further below.

***Based on our assessment of the new information we now object to the shipment. Notification validity ceases within 10 working days (see below).***

You have the possibility to provide your comments, and to provide any additional information. We emphasize that the burden of proof is on Equinor.

We expect any new information within 10 working days from now. Due to weekends and public holidays, this means at the latest by the end of the day on Friday the 9th of April, after which notification validity ceases.

We note that pursuant to the Regulation article 9, para. 5, issues must be resolved within 30 days following the date of transmission of the acknowledgement of the competent authority of destination in accordance with Article 8. This deadline has passed, and the 10 working days is to be seen as an extension of this deadline.

If at a later time you still intend to carry out the shipment (and if the issues has been solved at such a later time), a new notification must be submitted.

### **The new information we have received**

At the 15<sup>th</sup> of January 2021 we contacted Miljødirektoratet in Norway to seek confirmation for the information provided by you. Miljødirektoratet informed us at the 19<sup>th</sup> of January that they did not have any comments to - or specific reservations against - the documentation provided by you.

On the 2<sup>nd</sup> of February 2021 we contacted SAR Mongstad in order to obtain their confirmation of your conclusion. SAR responded in a manner which could not confirm your conclusion. SAR described to us that the volume treated in 2020 (approx. 100.000 tons) is not indicative of maximum capacity. Potentially, and given the right circumstances, SAR may be able to treat all of the water from Equinor, or a smaller amount such as 80%, depending on the content of the waste water. At least 20% would be possible to treat. SAR needs more information about the content of the waste water to estimate how much of it may be viable to treat. SAR also needs more information from Equinor in order to assess the commercial viability of a contract. SAR informed us of a continuous dialogue between your companies.

*Please see attached e-mail correspondence of the 2nd and 3rd of February 2021*

At our meeting on the 3<sup>rd</sup> of February 2021, we provided to you an early notice of this information from SAR. At the meeting, you confirmed to us that you have had communications with SAR since December last year, regarding their capacity for waste water treatment. You noted that salinity is important. We informed you that we would respond to you in a more formal manner regarding our assessment of the case.

Danish EPA met again with Miljødirektoratet on the 15<sup>th</sup> of February 2021 concerning the new information from SAR. Miljødirektoratet confirmed the view expressed by SAR; that it is plausible that SAR may have capacity for treating volumes of waste water equivalent to the volumes produced by Equinor, and that more information about the content of the waste water is necessary for SAR to evaluate whether the particular type of waste water may be treated at their facility.

Danish EPA met again with Miljødirektoratet on the 22nd of March 2021. No new information was fielded.

### **Our assessment**

On basis of the information we received from SAR it would seem at the outset that there is - or may soon be acquired - the needed capacity for treatment in Norway. As far as capacity is a concern it seems SAR can scale production to a level where it becomes possible to accept some or all of the water produced by Equinor. SAR needs more information from Equinor in order to conclude in final.

In order to give consent, Danish EPA would require for it to be ascertained in a conclusive manner that there is not the possibility of treating the waste water in Norway. We therefore note that the possibility of a consent would at the least require for Equinor to provide any needed information to SAR, and for Equinor

to provide Danish EPA with a response to such information from SAR.

### **Further issues**

*If it should be concluded* that SAR has the technical capability to treat the waste water, we would then need information about their current capacity as well as their ability to scale production and an expected timeframe.

Furthermore, it is important to note that the criteria for import into Denmark are

-whether the exporting country has the means to treat the waste itself (and if such facilities exist but do not have capacity, that is considered the equivalent of not having the means to treat the waste), and  
-whether the waste is generated in such small amounts that the building of new facilities must be considered uneconomical.

For practical reasons, we do not expect to go into detail with these issues unless you are able to provide new information regarding the treatment possibilities at SAR.

Venlig hilsen

### **Tor Søltoft**

Sagsbehandler | Cirkulær Økonomi & Affald

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Sagsbehandlernes tlf. +45 23 72 92 28, alle hverdage mellem kl. 9:00 – 15:00

### **Miljøministeriet**

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### **Sådan håndterer vi dine personoplysninger**

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Thank you