



NORWEGIAN PETROLEUM
DIRECTORATE

Fax

ADDRESSE Committee of European Securities Regulators (CESR) 11-13 Avenue de Friedland 75008 Paris, FRANCE	FAX NO. 00033158364330	NO. OF PAGES (INCL THIS ONE) 2
ATTENTION Secretary General, Mr. Fabrice Demarigny	EXEMPTED FROM PUBLIC DISCLOSURE CF.,	
FROM Kjell Agnar Dragvik	DATE 19.10.2004	PHONE, INQUIRIES TO
☐ 1. Will also be sent by post. ☒ 2. Will not be sent by post. ☐ 3. The contents of this facsimile are not binding for the NPD as an institution		

Concerning:

**Comments from The Norwegian Petroleum Directorate to CESR Consultation on
Recommendations for the Consistent Implementation of the European Commission's
Regulation on Prospectuses no. 809/2004**

Dear Sir,

We are pleased to provide our comments to CESR's recommendations for the consistent implementation of the European Commission's Regulation on Prospectuses no.809/2004.

The Norwegian Petroleum Directorate (NPD) has been made aware of the Consultation Paper (CESR/04-225b) in connection with its engagement in the United Nations Ad Hoc Group of Experts on Supply of Fossil Fuels. This is one of several international standardisation and harmonisation projects that NPD is engaged in.

Although financial reporting is not within the scope and responsibility of NPD, we would like to give some general comments to the Consultation Paper. In particular, we emphasise the importance of adopting well established and internationally recognised definitions of the commodities. The definitions have to be clear and meaningful for the companies as well as for the evaluators or investors.

It is NPD's experience, in connection with the annual reporting of data to NPD from the oil companies operating on the Norwegian Continental Shelf, that adoption of clear and internationally recognised definitions and classification system is very important to ensure quality and consistency of the data that are reported. The classification used by NPD is very similar to the SPE/WPC/AAPG classification published in 2000 and has been developed in close cooperation with the oil companies working in Norway. The SPE/WPC/AAPG classification has been the main classification used for the harmonization process to the UNFC. In this respect we regard the definitions set forward in the UNFC for Energy and Minerals as the best choice to be incorporated in the CESR document. The NPD has contributed actively to the development of the UNFC.

Concerning the documentation required and the certification of the documentation provided, our comment is that documentation should be kept to the minimum required to make an objective and fair judgement of the prospectus, thus making the burden of the companies as small as possible.

Further, we express our full support to the comments given by the UNECE (Reference No.: IREED/EN/2004/CESR) to the consultation paper which we have been made aware of.

Yours sincerely

Kjell Agnar Dragvik
Director

Per Blystad
Senior Geologist