Impact Assessment

The proposed regulation aims to establish a minimum common safety level regardless of the chosen classification society. Most of the sections proposed have already been established as requirements in regulations from recognized classification societies regarding battery safety. For vessels under 24 meters in length and with a gross tonnage under 500, it continues the regime established by circular RSV 09-2022.

However, parts of the proposal may have economic implications for the industry.

According to Section 3 of the proposal, upgrading costs will arise when replacing battery systems. The NMA emphasizes that the proposed requirements for battery systems are based on recent research and two significant incidents. To achieve the fire safety objectives of managing any fire in its originating space, many of the rules developed between 2015 and 2024 must be incorporated as new requirements for existing vessels.

The proposal for Section 5 on battery selection and configuration requires that battery systems be designed to prevent gas release into the battery room during internal cell incidents. This requirement will impact several current battery suppliers, necessitating design changes to meet the proposed standards. The NMA acknowledges that this requirement may have significant economic consequences for some market players. If the requirement is established, certain battery suppliers will need to redesign their products and likely obtain new type approval from a recognized classification society for installation on Norwegian vessels.

Similar conditions are outlined in guidelines from the European Maritime Safety Agency (EMSA), stating that Battery Energy Storage Systems (BESS) should not vent off-gas directly into the room. Although this requirement is not yet part of industry standards or classification society regulations, the NMA assumes it will not remain a uniquely Norwegian requirement over time. The requirement will apply equally to Norwegian and foreign battery suppliers. Requirements in Section 5 are crucial for the feasibility of the proposals in Section 20.

The competence requirement for conducting risk assessments in Section 8 will lead to increased costs for battery installations on vessels, with feedback indicating typical costs of NOK 250.000–300.000.