

15. Impact assessment

The purpose of the proposed section 6 c is to establish a common minimum safety level, regardless of which classification society is used. However, certain elements of the proposal will have economic implications for the industry.

Under the first paragraph, costs will arise when existing battery systems are replaced.

The proposal in the second paragraph, which introduces design and configuration requirements intended to prevent gas release into the battery room in the event of internal cell failures, will affect several battery suppliers. These suppliers will need to adapt their designs to comply with the new requirements, and some may need to obtain new type approval from an MOU classification society. The NMA acknowledges that this may have notable economic implications for some market participants.

The proposal in the third paragraph will increase construction costs for battery rooms. For mobile offshore units that already have installed battery systems, these costs will only arise upon replacement at the end of the system's design life.

The costs associated with the fourth paragraph are limited to the purchase and installation of gas detectors, including cabling and integration into existing systems.

The proposal in the fifth paragraph will have minimal economic consequences for units replacing an existing battery system. The costs associated with the sixth paragraph are limited to the procurement and installation of IR cameras, including cabling and monitors in continuously manned control rooms.

There is currently a requirement for a fixed fire-extinguishing system in the battery room, as set out in section 10 of the Regulations of 31 January 1984 No. 227 on precautionary measures against fire and explosion on mobile offshore units. The proposal in the seventh paragraph introduces a requirement for two fire-extinguishing systems. This will necessitate an upgrade of existing systems. The extent and cost of such upgrades will depend on the type of fire-extinguishing systems already installed on board, and costs may be significant where an entirely new system must be installed.

The proposal in the eighth paragraph will entail costs associated with the modification or reconstruction of the battery room ventilation system. For units with existing battery systems, this may involve a substantial upgrade.

The proposal in the tenth paragraph may, for mobile offshore units that already have installed battery systems, entail costs associated with moving equipment to a new location. These costs will only arise upon replacement at the end of the system's design life.

The costs associated with the eleventh paragraph are limited to the purchase of audible alarms, visual alarms, or combined devices (Ex-certified), as well as cabling and integration into onboard safety systems.

The proposal in the twelfth paragraph entails the installation of sensors in the battery room and on individual components such as fans and dampers, together with integration into existing systems. The NMA assumes that this will have minor economic consequences.

There are currently no specific technical requirements for battery systems or battery rooms in the NMA's regulations applicable to mobile offshore units. However, there is a requirement that battery rooms and associated equipment be subject to risk assessment pursuant to the Regulations on risk analysis for mobile offshore units. The NMA has acquired considerable knowledge of the risks associated with battery systems, based on incidents and research in this field. The installation of battery systems today also entails significant costs, and the knowledge gained from recent research and past incidents must therefore be taken into account

in the risk assessment. Overall, the NMA considers that the costs of installing battery systems on board a mobile offshore unit today, where a risk analysis forms the basis, are likely to be broadly in line with the costs associated with the proposed requirements. In the NMA's view, the proposal safeguards maritime safety and provides a more user-friendly regulatory framework for the industry.

The amendments to sections 10, 11, 13 and 21 will entail no or minor economic implications.