

*The Director General*



EUROPEAN COMMITTEE FOR STANDARDIZATION  
COMITÉ EUROPÉEN DE NORMALISATION  
EUROPÄISCHES KOMITEE FÜR NORMUNG

Mr Daniel Calleja Crespo  
EC DG GROW Director General

Mr Dominique RISTORI  
EC DG ENER Director General

Brussels, 30 January 2015

Ref: 14805  
Subject: Application of sanction law on standards for oil & gas

*Dear Daniel,  
Dear Dominique,*

I would like to bring your attention to a long standing issue that is seriously damaging the use and promotion of European standards and technology in the global market for the oil and gas (O&G) industry.

Standards in this domain are very important for many reasons, of which I think it is relevant to highlight two: **safety** for the O&G industry (people and environment) and **cost** (with the industry spending some \$1000 billion per year to build/improve platforms, refineries, rigs and other installations).

We can rightly say that for many years, the CEN TC12, which is the European mirror committee for ISO TC67, *Materials, equipment and offshore structures for petroleum, petrochemical and natural gas industries*, has been producing standards on equipment for the oil and gas industry, working closely together with API, the "*American Petroleum Institute*". Whereas this collaboration has been very satisfactory and resulted in common, global standards, which have led to substantial reductions in risks and have helped to keep costs under control, these are now under threat.

Since 2012, international sanctions are making this collaboration impossible. First, Iranian sanctions made the work in ISO TC67 WGs very difficult, and the recent Russian sanctions have put the system under even more pressure, jeopardizing the safety of some 1500 international experts.

CEN, ANSI *-American National Standards Institute-* and IOGP *-the International Association of Oil and Gas Producers-* have already tried, both on the US and the European side, to make the sanction policy makers aware of the consequences of these sanctions on standardization work in the sector.

The European Commission has indeed been helpful in providing us with an evaluation of the Compatibility of standards development processes with EU export control and sanctions law (Ref. Ares(2012)1304763 – 06/11/2012). Nevertheless, this has not allayed the concerns of the many international experts who need a safe legal environment to do the job that is required and expected of them.

That is why, due to safety and trade reasons, I would be very grateful if you could help us find a solution to support the European industry, the suppliers, manufacturers, service companies or the European environment and the industry experts/employees' safety.

To achieve this, standardization work needs to be clearly exempted from sanction regimes.

I'm afraid that in the absence of such a decision, the oil and gas industry standards work will stop completely. We are fully aware of the difficulty of this request and are ready and available to have deeper discussions on the matter together with representatives of major companies suffering from the current situation.

I would appreciate your guidance on how to proceed next and be given the opportunity to meet with you or relevant EC services to try and find a way forward.

Thank you very much for your attention and consideration,

Yours sincerely,



Elena SANTIAGO CID

CC: Mr Jean-Luc DEMARTY, EC Director General DG TRADE  
Mr Stefano MANSERVISI, Head of Cabinet of VP Federica MOGHERINI  
Mr Tung-Lai MARGUE, Director Service for Foreign Policy Instruments  
Mr Antti PELTOMAKI, EC Deputy Director-General 1 DG GROW  
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