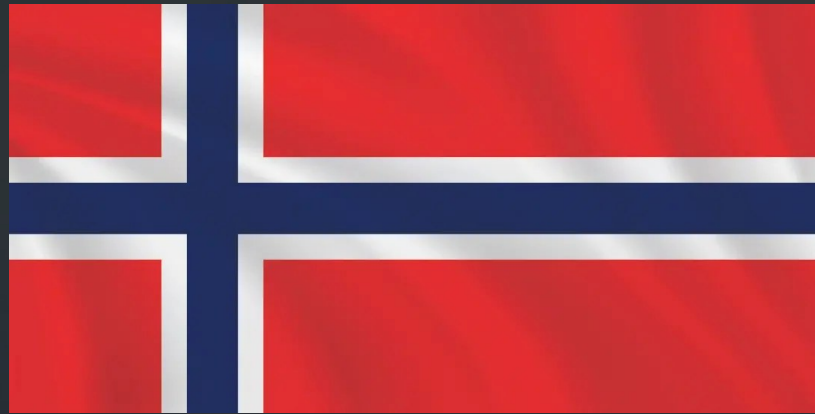




FICTITIOUS USE CASE: NORDFJORD SUBSEA SERVICES AS, STAVANGER

*“The Sustainability data SMEs need already exists
- they just need access to it.”*



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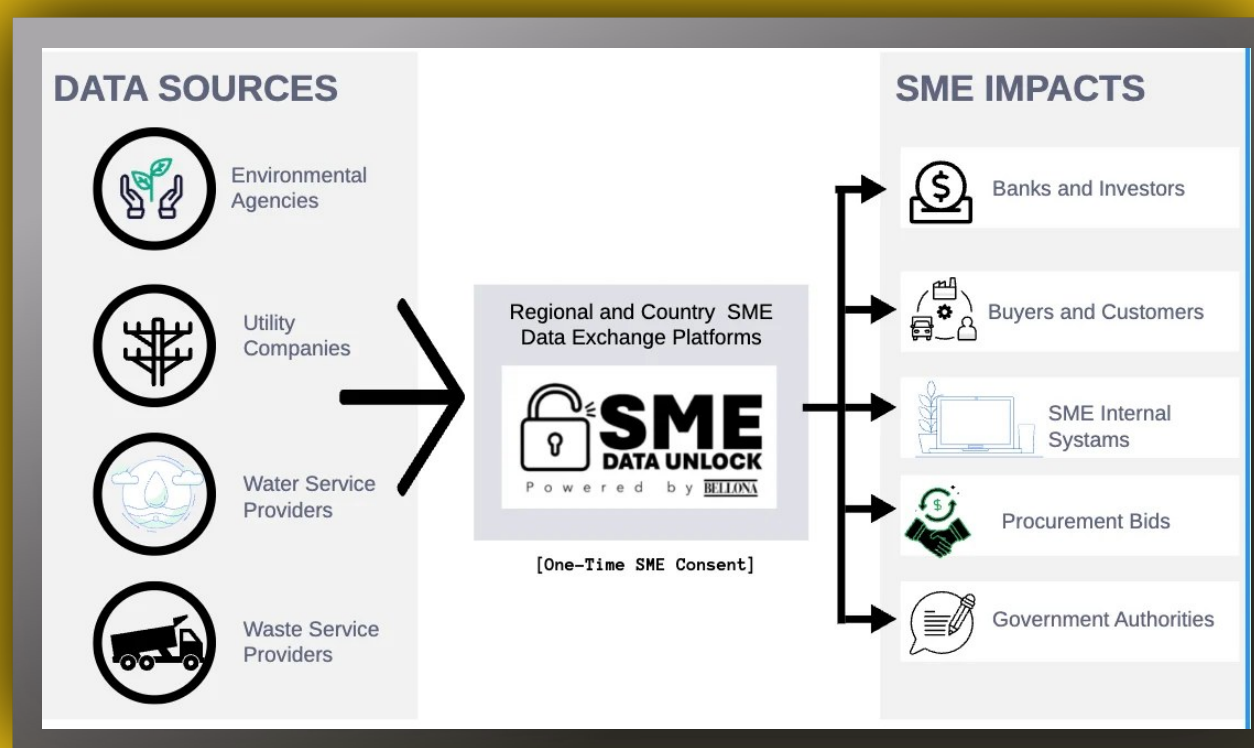
Introduction to the SME Data Unlock Use Case

In the current data-driven economy, the demanding environment of the real economy, Small and Medium-sized Enterprises (SMEs) are increasingly caught in a regulatory data storm. As strict sustainability reporting frameworks cascade downstream, small businesses face intensive data demands from operators, banks, and regulators—including multi-page questionnaires, green-loan criteria, and voluntary standards.

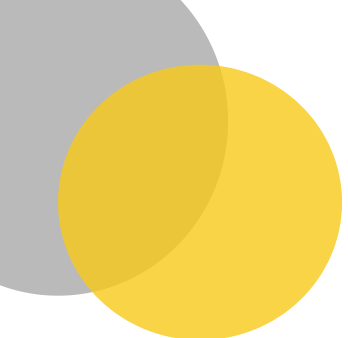
The critical challenge for these companies is not a lack of capacity or negligence, but a fragmented data infrastructure problem. The sustainability data these companies are desperately hunting for—ranging from hourly energy consumption to regional flood risks and waste tracking—already exists. However, it remains trapped across disparate public-sector registries, government repositories, and utility systems that do not communicate with one another. Manual data collection imposes a massive, error-prone administrative burden on small teams lacking dedicated sustainability departments. Using the concrete operational realities of the Norwegian offshore supply chain as a primary framework, this use case demonstrates how structural data barriers actively stall climate transparency and green investment—and precisely how a unified data highway can solve it.

About SME Data Unlock

SME Data Unlock is an open, collaborative global initiative designed to bridge the persistent data gap preventing SMEs from fully participating in the green transition. Rather than acting as a software product or a consulting service, the initiative operates as a proposal to treat sustainability data as vital digital public infrastructure. By bringing together public and private stakeholders, SME Data Unlock focuses on developing AI-powered SME Data Exchange Platforms. The initiative leverages an open-source, AI-powered taxonomy-mapping platform combined with a secure, consent-driven data-sharing trust framework.



Through a single, secure interaction tied to existing digital identity networks, businesses can instantly authorize the automated retrieval of their existing data. SME Data Unlock automatically maps fragmented outputs into standardized, machine-readable formats (such as XBRL).

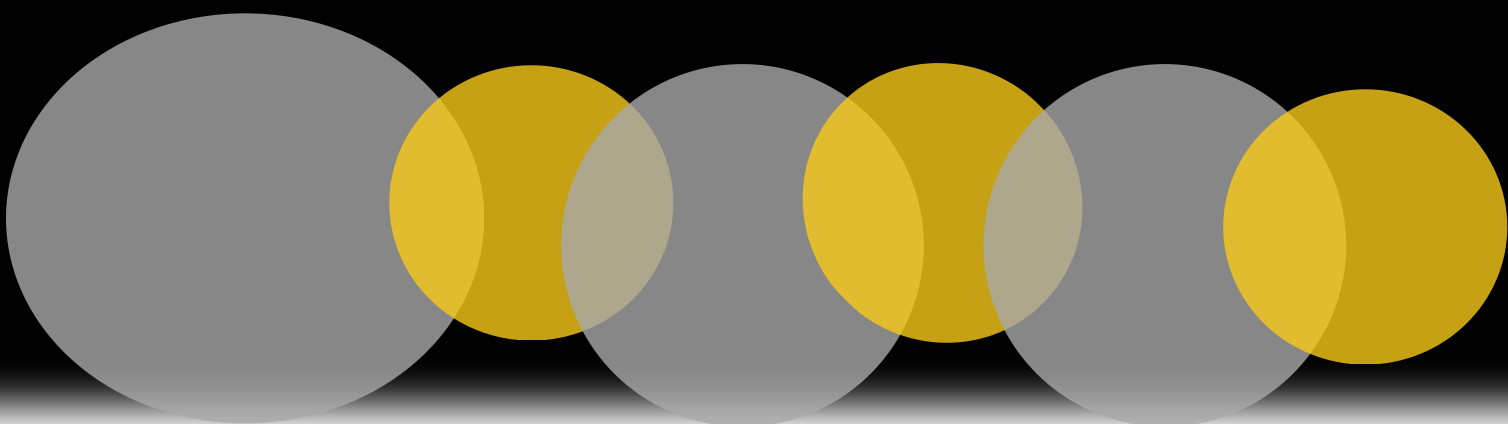


WHY

The SME Sustainability Data Crisis

Across the globe, SMEs form the backbone of economies and make up more than 90% of all businesses, yet they face serious barriers to accessing the sustainability data they need. As a result of new global regulations, green market and finance policies, SMEs are facing myriad data requests, each structured differently. Yet, they can't access the data because it is siloed and fragmented, and the cost and time burden of compliance is too high.

Despite efforts by international, regional, and country-level institutions to support SMEs, SMEs continue to lack the resources, expertise, and tools needed to meet data demands from customers, regulators, and financial institutions, as well as procurement requirements. The key sustainability data SME's need is in public and regulated systems, but they can't access it. As a result, they are at increasing risk of losing their place in critical value chains and often choose not to participate in green lending and finance programs.



Introduction

Norway's offshore oil and gas supply chain is one of the most technically demanding in the world. The companies that keep the Norwegian Continental Shelf (NCS) operating — welders, inspection firms, subsea equipment specialists, logistics providers, and engineering consultancies — are overwhelmingly SMEs. They are also increasingly caught in a regulatory data storm not of their making.

Sustainability reporting is not a capacity problem. It is a data infrastructure problem.

The story of Nordfjord Subsea Services illustrates that the pressure bearing down on oil and gas supply-chain SMEs is not a consequence of their own complexity or negligence. It is the downstream manifestation of an upstream regulatory architecture that has outpaced the data systems designed to serve it. The data these companies need to report already exists — in government registries, permit databases, and operator qualification systems. It is simply not accessible in the standardized, machine-readable formats that reporting frameworks now demand.

About Nordfjord Subsea Services AS

Rune Dahl is the managing director of Nordfjord Subsea Services AS, a 34-person subsea inspection and integrity management firm based in Stavanger. The company provides remotely operated vehicle (ROV) inspections, pipeline surveys, and structural integrity assessments to operators on the NCS. Under Rune's leadership, Nordfjord has built a reputation for precision and reliability, earning long-term framework agreements with two mid-sized operators and a place on the Magnet JQS prequalification register — the joint qualification system used by most major Norwegian operators to assess and onboard suppliers.

The company employs a mix of ROV pilots, subsea engineers, HSE coordinators, and project managers. It operates two owned ROV systems, leases a third, and mobilizes through its operators' vessels. Its environmental footprint includes its Stavanger office, a workshop and maintenance facility in Tananger, a diesel generator backup system, a company vehicle fleet, and the chemical consumables used in subsea surveys. By any ordinary measure, Nordfjord Subsea is a well-run, technically competent Norwegian SME.

In May 2026, three separate reporting demands landed on Rune Dahl's desk within ten days.

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Three Requests in Ten Days



Figure 1. Three separate sustainability data requests

The first demand: Equinor

The first demand came from Equinor's procurement team as part of their annual supplier sustainability review. As a company well above the revised CSRD thresholds — 1,000 employees and €450 million in turnover, set by the EU Omnibus I package of March 2026 — Equinor must account for material impacts across its entire value chain, including Scope 3 emissions from its contractor base. The questionnaire sent to Nordfjord runs to 38 pages. It asks for Scope 1 emissions from the company's diesel generator and vehicle fleet, Scope 2 emissions from purchased electricity, and Scope 3 Category 1 data on the carbon footprint of chemicals and materials used in survey operations. It also requests the waste generated by the stream in tonnes, the water consumption in cubic meters, and a description of the company's HSE management system, with reference to its Havtil audit history.

Failure to respond risks removal from the framework agreement.

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The second demand: DNB Bank

The second demand arrives from Nordfjord's bank. DNB is offering a preferential financing facility to support the purchase of a new, more energy-efficient electric-hybrid ROV system — a significant capital investment. The green loan application requires documented Scope 1 and Scope 2 emissions baselines, evidence of the company's existing energy consumption profile, and a forward-looking assessment of how the new ROV will reduce the company's operational carbon intensity. The application also asks whether the company's Tananger workshop is exposed to coastal flood risk under a 10-year climate scenario — a requirement that traces back to the European Banking Authority's ESG risk guidelines, which entered into force in January 2026.

The third demand: a mid-sized operator

A third request for information reached Nordfjord Subsea through a more circuitous route. One of their smaller clients in the 250- to 500-employee bracket—a firm technically exempt from the updated CSRD mandates—has chosen to implement a voluntary sustainability reporting framework to meet its investors' demands. Consequently, their ESG lead has issued a data inquiry for suppliers that follows the EFRAG Voluntary SME Standard (VSME). While the VSME is intended to be a streamlined, less burdensome framework, it still necessitates the provision of organized, quantitative data regarding energy intensity, greenhouse gas emissions, and waste protocols—metrics that Nordfjord has not previously systematically recorded.

None of the three requests references the others. None uses the same definitions, reference periods, or data formats. Each is, strictly speaking, manageable in isolation. Collectively, they represent a systemic burden for a 34-person company with no dedicated sustainability function.



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Rune passes the stack of documents to his Health, Safety, and Environment (HSE) coordinator, Inger. She is competent and conscientious — fully qualified in NORSOK Z-013 risk assessment and familiar with Havtil's reporting systems. She has, however, never encountered the phrase 'Scope 3 Category 1 purchased goods and services.' She opens a spreadsheet and begins.

The Upstream Regulatory

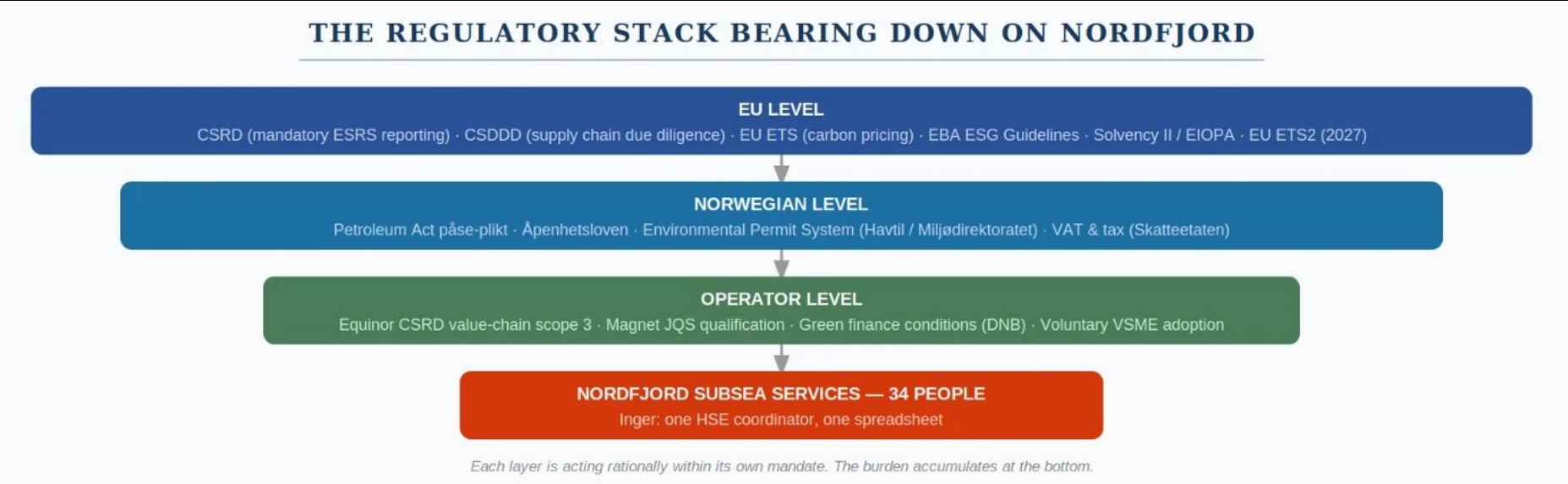


Figure 2. The regulatory stack bearing down on a



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None of Nordfjord's counterparts is acting arbitrarily. Each is responding rationally to obligations embedded in a layered regulatory structure.

Equinor's supply chain requirements stem from multiple intersecting obligations. As a company well above the revised CSRD thresholds, Equinor must produce a comprehensive sustainability report covering material environmental impacts across its value chain. The Corporate Sustainability Due Diligence Directive (CSDDD), scoped to companies with more than 5,000 employees and €1.5 billion in turnover, further obliges it to identify and mitigate environmental and human rights risks throughout its value chain. Norway's own Åpenhetsloven (Transparency Act) imposes additional due diligence duties at considerably lower thresholds. And under the Petroleum Act's performance-based 'see-to duty' (påse-plikt), licensees are legally required to ensure that their entire contracting chain meets functional safety and environmental targets — which in practice means gathering evidence from SME suppliers.

The EU ETS adds yet another layer. Norwegian offshore installations have been integrated into the EU Emissions Trading System since 2008. With the EU ETS2 launching in 2027 to cover fuel-related emissions, demand for granular carbon accounting across the supply chain will only intensify.

The bank's requirements reflect the EBA's ESG risk management guidelines, which since January 2026 require financial institutions to systematically identify and manage climate-related risks across their portfolios, including exposures to SME borrowers. Green loan products are, in practice, a vehicle for extracting assurable sustainability data. The bank needs Nordfjord's emissions baseline not to obstruct the loan, but because supervisory expectations now make lending without it a compliance liability.

The insurance and investor-driven request traces back to updates in the Solvency II framework, which now embeds physical and transition climate risks in insurer risk management. EIOPA mandates long-term climate scenario analysis — up to 75–80 years — in insurers' Own Risk and Solvency Assessments. These pressures cascade through the investment and insurance value chain, eventually reaching the ESG managers of mid-sized operators, who pass them on to suppliers like Nordfjord.



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What Inger Encounters

Inger sits at her desk with the 38-page Equinor questionnaire, a browser, and a spreadsheet. She works through it methodically.

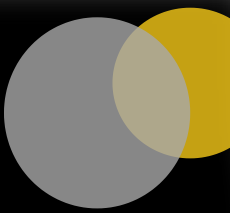
Question 7 asks for total Scope 1 GHG emissions in tonnes of CO₂ equivalent for calendar year 2025, broken down by emission source. Nordfjord's primary Scope 1 sources are its diesel backup generator and vehicle fleet. The generator's fuel purchase records are a folder of supplier invoices, in liters, with no emissions factor attached. The vehicle fleet uses a mix of diesel and one plug-in hybrid — the fuel card records are in the company's accounting system, but are not disaggregated by vehicle. Inger calculates approximate emissions using a conversion factor she finds on Miljødirektoratet's website, then wonders whether she should use a location-based or market-based factor and what the difference means.

Question 12 asks for total Scope 2 emissions from purchased electricity. Nordfjord buys electricity for both its Stavanger office and its Tananger workshop from the same supplier. The invoices show kWh and NOK. Inger knows that Norway's grid is predominantly hydropower, but the questionnaire asks for the specific guarantee-of-origin (GO) certificate status of the purchased electricity. The power company's invoices do not specify this. She searches the Norwegian guarantee-of-origin registry (NECS), cannot find Nordfjord's account, and writes "approximately 98% renewable based on Norwegian grid mix" — directionally correct, but not the assurable figure Equinor needs.

Question 19 asks for the total waste generated in tons, disaggregated by waste stream. The waste hauler collects from Tananger monthly and sends pickup confirmations—the confirmations list category codes and approximate volumes, not weights. Inger contacts the waste company, which tells her that tonnage data is available from Miljødirektoratet's waste reporting portal — but only if Nordfjord has registered as a waste producer with its organization number, which it has not done explicitly for this purpose.



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Question 24 requests the company's Havtil audit history — specifically, whether any non-conformances related to chemical discharge management have been raised in the past three years. This information exists in Havtil's internal systems and in Nordfjord's Magnet JQS profile. But extracting it in the specific format the questionnaire requires means manually downloading and reformatting data from multiple sources.

Question 31 asks whether the company's facilities are within a coastal or fluvial flood risk zone, referencing a 10-year return period. Inger checks NVE's flomsonekart for Tananger and finds the relevant layer. The answer is no — but she has to navigate three separate NVE data portals to confirm it, and the information is not in a format she can attach or cite directly.

By the end of the first day, Inger has answered approximately half the questionnaire. Many of her answers are approximations, inconsistently referenced to different time periods, and — though she does not know this — incorrect in two places where she applied the wrong emissions conversion methodology.

The Data Already Exists — It Is Just Not Where Nordfjord Needs It

THE DATA JOURNEY: WHERE INGER'S ANSWERS ACTUALLY LIVE

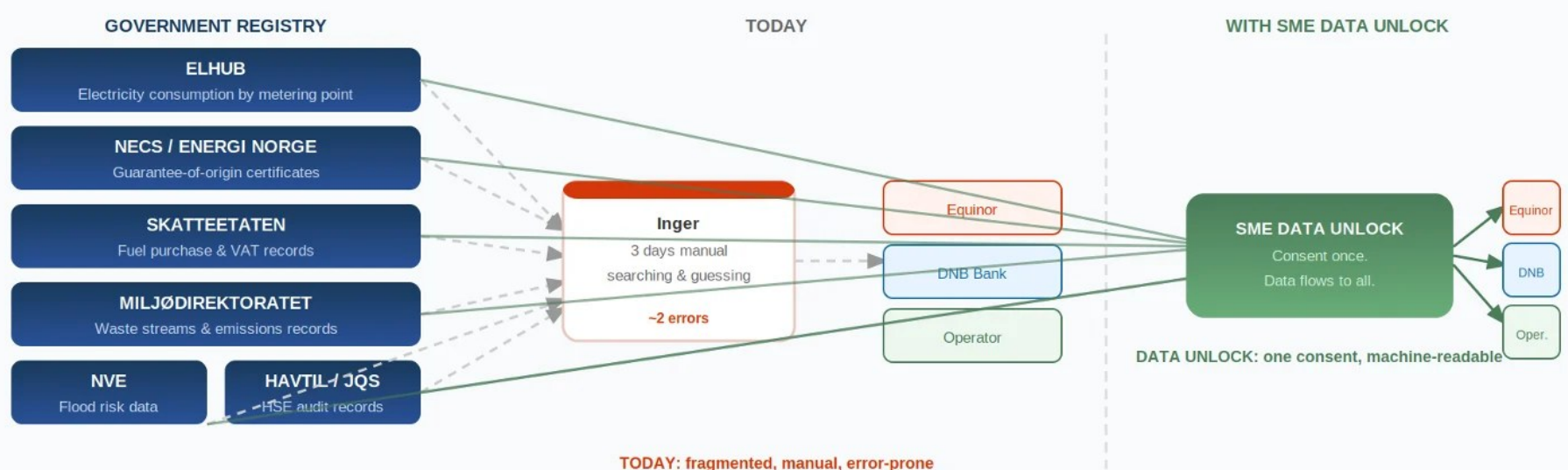
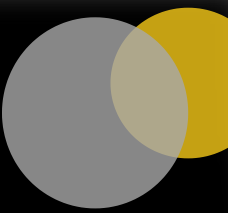


Figure 3. The same data, two paths: fragmented and manual today; consolidated and consent-based with SME Data Unlock.

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A majority of the figures Inger struggled to compile already exist in Norwegian public-sector databases and regulatory systems, in a more accurate and auditable form.

Electricity and grid data

Electricity consumption and grid-mix data for Nordfjord's metering points exist in Elhub — Norway's centralized electricity data hub managed by Statnett. Elhub holds hour-by-hour consumption data for every metered point in the country. Guarantee-of-origin certificate data is held in the NECS registry under Energi Norge. Neither system is designed to deliver this data to a small subsea company on demand, in a format that maps to CSRD reporting fields.

Fuel purchase and emissions data

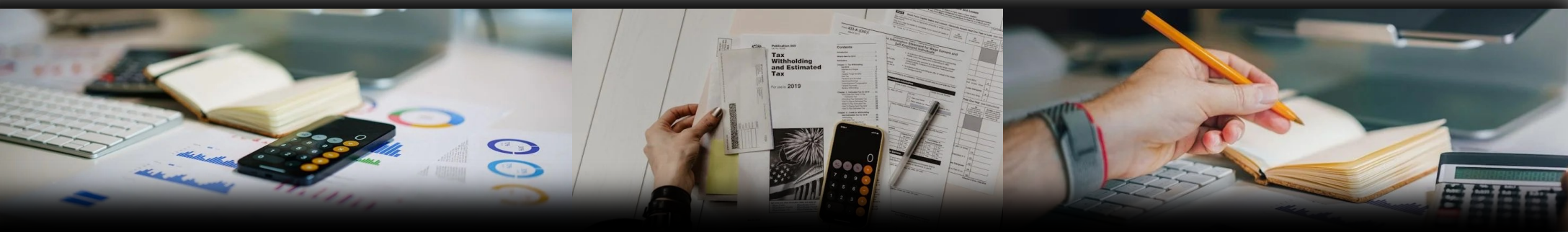
Vehicle fuel consumption is logged by the card provider and, to the extent tax recovery is claimed, referenced in the company's VAT returns held by Skatteetaten. Emission factors are published annually by Miljødirektoratet. No standardized pathway exists to pull these together into a formatted Scope 1 disclosure.

Waste data

Nordfjord's waste streams are partly captured in Miljødirektoratet's avfallsstatistikk system and partly held by licensed waste operators under their own reporting obligations to the Environment Agency. The data exists — it is reported by the waste hauler to the authorities — but it is not accessible to Nordfjord in structured form.

Flood and climate risk data

NVE maintains the national flomsonekart and the groundwater and coastal flood risk datasets. The Norwegian Meteorological Institute (MET Norway) maintains climate projection data. These are publicly available but not in formats that can be integrated directly into a supplier questionnaire or a bank's climate risk disclosure.



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Havtil audit and HSE compliance records

Nordfjord's non-conformance history, corrective action records, and Havtil inspection outcomes are partly visible in the Magnet JQS portal — which operators already require the company to maintain. That same data, reformatted, is precisely what Equinor is asking for in its supplier questionnaire. The data is being reported twice across two different systems because those systems do not communicate.

Company registration and employee data

Enhetsregisteret at Brønnøysund holds Nordfjord's organisation number, sector classification, and size data. The A-ordningen system holds salary and headcount reporting. These are the building blocks of any reporting framework's entity-level data requirements — and they already exist.

The problem is not data availability. The problem is that none of these registries was designed to interoperate with each other, or to deliver data to an SME in the structured, standardized format that reporting frameworks require. Each answer to a different regulator, a different statutory mandate, and a different access regime.



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The Oil and Gas Supply Chain: A Uniquely Complex Data Environment

The Norwegian oil and gas sector presents data challenges that go beyond those facing most other SME sectors. Several features of the industry make the gap between 'data exists' and 'data is usable' especially acute.

Multiple overlapping regulatory systems

An SME in the NCS supply chain must report to or interact with Havtil (operational HSE), the Norwegian Offshore Directorate (NOD, resource management and licensing), Miljødirektoratet (environmental permits and discharge monitoring), Skatteetaten (tax and VAT, including special petroleum tax considerations for some larger suppliers), Enhetsregisteret, and the Epim Environment Hub — all before a single voluntary or supply-chain-driven request lands on the desk. The architecture of Norwegian petroleum regulation is sophisticated and well-maintained. It was not, however, designed with SME sustainability disclosure in mind.

The Magnet JQS paradox

The joint qualification system used by major operators is both part of the problem and part of the solution. Nordfjord already populates detailed company profile data into Magnet JQS — HSE statistics, certifications, financial indicators, and environmental data. That data was entered once for qualification purposes and remains in the system. When Equinor sends a sustainability questionnaire, it is in practice asking for a large subset of information that already exists in a system Equinor itself operates. The duplication is not accidental — it reflects the fact that qualification systems and CSRD reporting frameworks have evolved in parallel, without interoperability as a design goal.

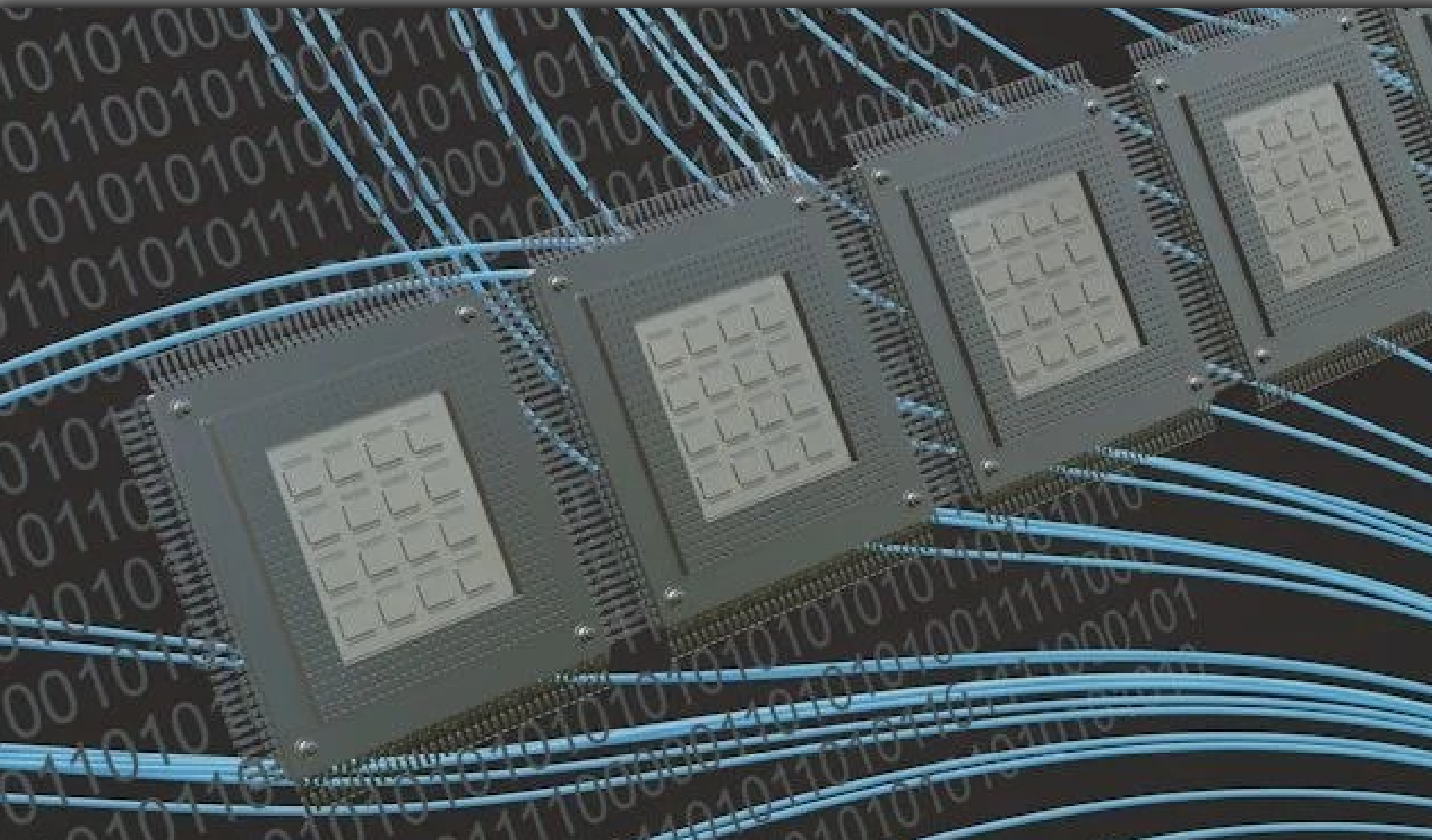
Chemical and material traceability

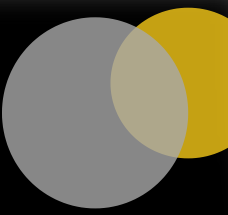
Subsea inspection companies use a range of chemical consumables — hydraulic fluids, cleaning agents, inhibitors, and equipment preservation compounds. Scope 3 Category 1 emissions accounting (purchased goods and services) requires understanding the carbon footprint embedded in these supplies. This data does not exist in any Norwegian government registry; it relies on supplier-level product carbon footprints, which are themselves rarely available in standardized form. For this category, the data genuinely does not yet exist in machine-readable form anywhere — not in government systems, not in the supply chain. This is a genuine gap, not an access problem.

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Offshore vs. onshore boundaries

Nordfjord's primary environmental footprint occurs during offshore mobilisations on operator vessels — in a regulatory space where the operator, not the service company, holds the discharge permit and emissions reporting obligations. This creates a conceptual ambiguity: whose Scope 1 emissions are the ROV's hydraulic fluid discharges? Whose energy consumption is the thruster power draw from the operator's vessel? These boundary questions remain unresolved in current reporting frameworks and are a consistent source of error in any hand-assembled response.





What SME Data Unlock Could Do for Nordfjord

SME Data Unlock proposes a consent-based data highway that allows Nordfjord Subsea Services to authorize — through a single interaction built on Norway's existing BankID/Altinn/ID-porten trust infrastructure — the retrieval of its data from the registries where it already resides. A structured data pull for Nordfjord's annual sustainability disclosure would draw from the following sources:

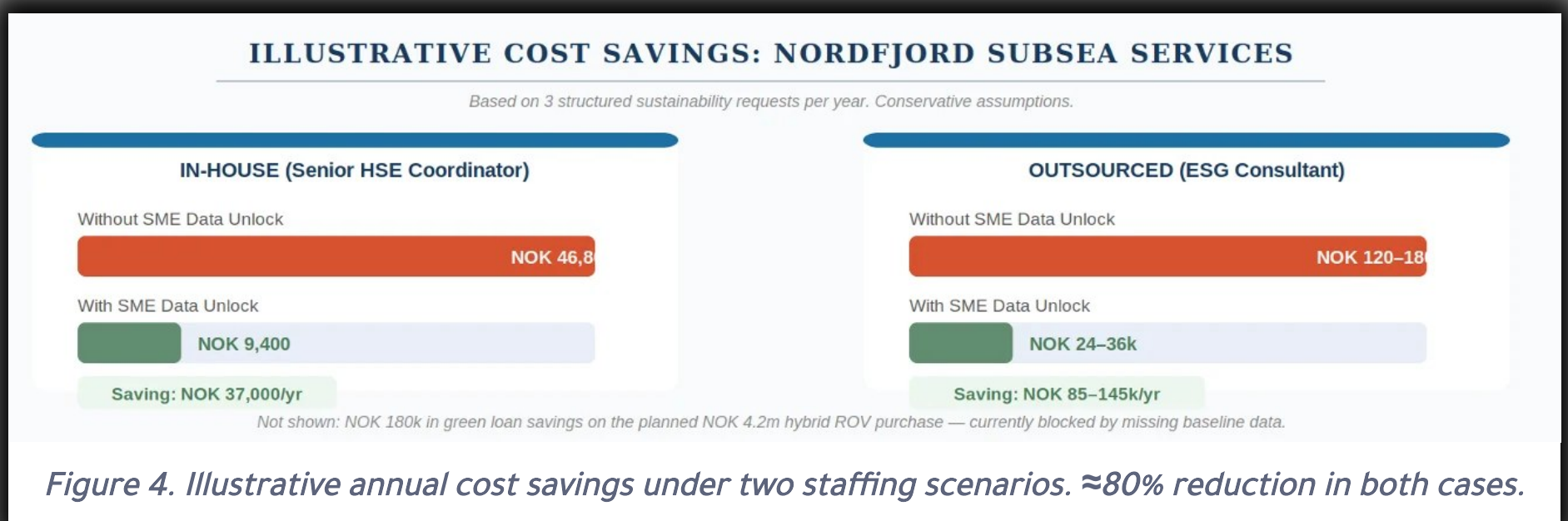
Data need	Regulatory framework	Source registry	Current accessibility
Electricity consumption by metering point	Scope 2 (CSRD / VSME)	Elhub	API available; not SME-oriented
Grid electricity emissions factor / GO certificates	Scope 2 market-based	NECS (Energi Norge)	No structured SME access
Vehicle fuel consumption (VAT-claimed)	Scope 1 (CSRD / VSME)	Skatteetaten VAT data	No structured access; fragmented
Waste volumes and stream classification	Waste reporting (CSRD / VSME)	Miljødirektoratet / waste operators	Accessible via operator reporting; not SME-facing
Flood risk zone classification	Climate risk (EBA guidelines, green loans)	NVE flomsonekart	Publicly available; not API-formatted for disclosure
Climate projections (coastal, temperature)	Physical risk assessment	MET Norway	Published; not structured for SME disclosure
HSE non-conformance and audit records	Petroleum Act; supply-chain questionnaires	Havtil / Magnet JQS	Exists; not interoperable with CSRD frameworks
Company entity data (employees, sector, turnover band)	CSRD entity-level scoping	Enhetsregisteret	Well-structured; accessible
CO ₂ tax and ETS compliance records	EU ETS; Petroleum Act	Miljødirektoratet ETS registry	Operator-level; SME access unclear

The goal is a single, SME-controlled consent flow that authorizes data retrieval from these sources, maps the outputs to the relevant reporting fields (VSME, ESRS, EFRAG taxonomy, or a specific customer's questionnaire schema), and produces a structured, XBRL machine-readable disclosure that can be submitted to any requesting party — the bank, the operator, the insurer — without replication of manual effort.

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Illustrative Savings: Nordfjord Subsea Services

The figures below are illustrative models, not measured results. They apply conservative assumptions to Nordfjord's profile: a 34-person company receiving three structured sustainability data requests per year (one major operator questionnaire, one green loan application, one VSME-aligned investor request).



These figures do not capture the most significant value at stake: access to green financing that is currently blocked. The new electric-hybrid ROV system Rune Dahl wants to finance costs NOK 4.2 million. The preferential interest rate on DNB's green facility represents savings of approximately NOK 180,000 over the loan term — savings that are unavailable if the baseline emissions data required for the application cannot be produced in an ascertainable form. Nor do they capture the risk of de-listing from framework agreements if supplier questionnaires cannot be completed to the operator's required standard.



USE CASE: NORDFJORD SUBSEA SERVICES AS, STAVANGER

Why the Oil Sector Data Gap Is Harder to Close — and Why It Must Be Closed

The Norwegian offshore supply chain is one of the highest-value SME ecosystems in the country. More than 1,600 companies supply the NCS. The sector has the highest average revenue per employee of any Norwegian SME segment. It also faces the most complex, multi-layered, and rapidly evolving regulatory data demands of any supply chain in Norway.

The Magnet JQS system, operated jointly by major operators, is a partial precedent for what SME Data Unlock proposes: a shared, SME-facing data infrastructure built on industry coordination. It demonstrates that the sector can organize around shared data standards when there is sufficient commercial incentive to do so. What it lacks is the connection to the public-sector registries — Elhub, Miljødirektoratet, NVE, Skatteetaten, Enhetsregisteret — that hold the source data needed to populate sustainability disclosures.

The A-ordningen — Norway's unified payroll and tax reporting system — is a direct analogy. Before A-ordningen, employers submitted salary, tax, and social insurance data to three separate agencies, in three different formats, on different schedules. A-ordningen replaced that with a single monthly submission that satisfies all three. The result was a measurable reduction in administrative burden and a significant improvement in data quality. The connective infrastructure for sustainability reporting in the oil and gas supply chain requires the same level of ambition.

The question is not whether Norway has the capacity to build this. The question is whether anyone owns the problem. Currently, no one does. Ultimately, it is Inger — Nordfjord's HSE coordinator — who owns the data gap.



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What SME Data Unlock Is — and Why Government Must Step Up

SME Data Unlock is not a software product. It is not a consultancy service. It is not a reporting tool that helps small businesses fill in forms more efficiently.

It is a proposal to treat sustainability data as digital public infrastructure — in the same category as roads, electricity grids, and the internet itself — and to build the connective layer that allows that infrastructure to function for the businesses that need it most.

At its core, SME Data Unlock is an open-source, AI-powered taxonomy-mapping platform combined with a consent-driven data-sharing trust framework. Through secure connections built on Norway's existing digital identity infrastructure — BankID, Altinn, ID-porten — it allows an SME to authorise, in a single interaction, the retrieval of its own data from the government registries where it already resides: Elhub for energy, Matrikkelen for property, Miljødirektoratet for emissions and waste, NVE for flood risk, Enhetsregisteret for company data. That data is then mapped automatically to the relevant reporting fields — ESRS, VSME, EFRAG taxonomy, or a specific customer questionnaire — and produced as a structured, machine-readable disclosure.

The result: data captured once, reused across every reporting context. The bank application, the operator questionnaire, the insurer's climate risk request — all answered from the same verified source, without Inger spending three days hunting invoices and guessing at conversion factors.

This is not technically difficult. Norway has done harder. The A-ordningen unified salary, tax, and social insurance reporting across three agencies into a single monthly submission. Altinn already mediates between businesses and dozens of government registers. BankID underpins an entire generation of private-sector digital services that the state did not have to build. The connective infrastructure SME Data Unlock requires is the same kind of infrastructure Norway has successfully built before, in other domains.

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The consent layer that does not yet exist

Norway already has a world-class digital identity infrastructure for individuals and for businesses interacting with the state. What it does not yet have is a clean, standardized mechanism for a business to say: 'I authorize this third party to retrieve my Elhub consumption data, my Matrikkelen record, my Miljødirektoratet waste reports, and my NVE flood risk classification — for the specific purpose of producing a sustainability disclosure — for the next twelve months.'

The issue is a consent architecture problem, and it sits squarely in the public domain. Public authorities hold the data. The identity infrastructure is public. The interoperability standards must be set by someone with the mandate to set them across multiple agencies and statutory frameworks. No private company can do this. No foundation can mandate it. Only the government can establish the legal basis, the governance model, and the cross-agency coordination required to make it real.

Why No One Has Fixed It Yet

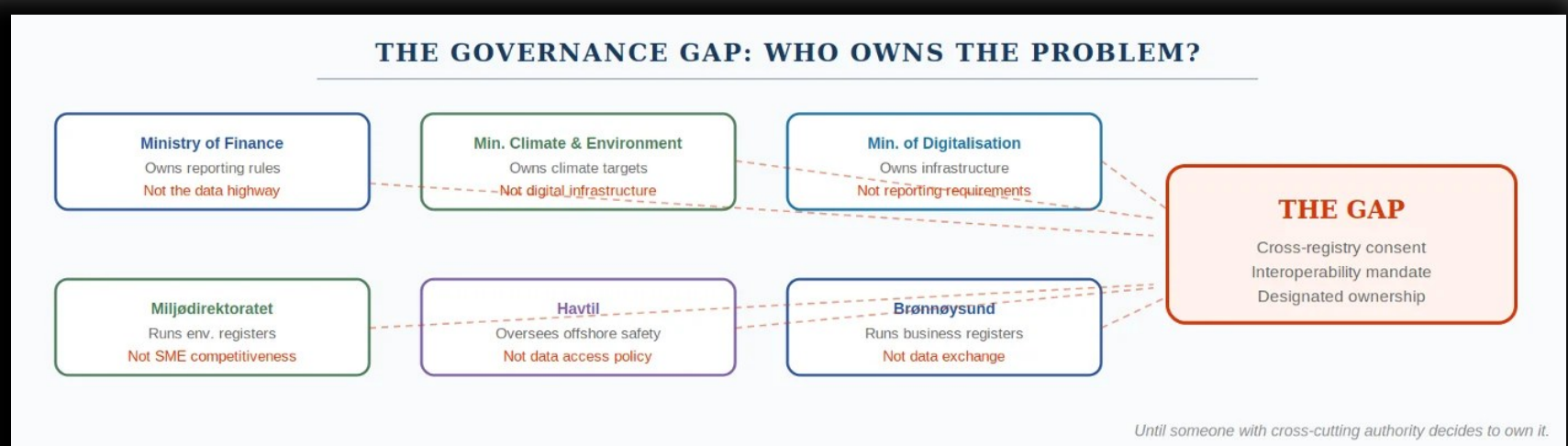


Figure 5. Six well-functioning institutions, one gap none of them owns.



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What SME Data Unlock Is – and Why Government Must Step Up

The reason this gap persists is not that the solution is unknown. It is that the problem falls between institutional mandates.

The Ministry of Finance owns the Accounting Act and the sustainability reporting rules that flow from it — not the data highway beneath those rules. **The Ministry of Climate and Environment** is responsible for climate targets — not digital infrastructure. **The Ministry of Digitalisation** owns the infrastructure — but does not set sustainability reporting requirements. **Miljødirektoratet** runs environmental registers — but is not responsible for SME competitiveness. **Havtil** oversees operational safety in the oil sector — but does not manage data access policy. **Brønnøysund** runs the business registers — but does not operate a data exchange for sustainability disclosures.

Each of these bodies is doing its job well. The problem exists not within any of their mandates, but in the gaps between them. And problems that live in the gaps between mandates are, by definition, no one's problem — until someone with cross-cutting authority decides to own them.

That is what SME Data Unlock is asking the government to do. Not to build the platform itself, but to adopt an open source SME Data Unloc solution. Not to fund a new agency. But to make three decisions that only the government can make:

- **Establish the legal basis for cross-registry consent.** Determine which statutory instruments govern each relevant registry, and create the legal mechanism that allows a business, using its existing BankID/Altinn identity, to grant a third party time-limited, purpose-limited access to its data across multiple registries simultaneously. This is a legislative and regulatory task that requires coordination among the Ministry of Finance, the Ministry of Digitalization, and the individual agencies that hold the data.
- **Mandate interoperability standards.** Each registry currently has its own API maturity, data schema, and access regime. Standardizing the output format — so that a kWh reading from Elhub, a property record from Matrikkelen, and a waste record from Miljødirektoratet all speak the same machine-readable language and map to the same reporting fields — requires a government mandate. This is not a market that will self-coordinate, because no individual registry has an incentive to invest in interoperability for a use case that is not its core mandate.

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- **Designate an owner.** The A-ordningen works because someone owns it. Altinn works because someone owns it. SME Data Unlock needs a designated owner — a body with the mandate, the resources, and the cross-agency authority to build and maintain the connective layer. That owner does not need to be a new institution. It could be an expanded mandate for Altinn, a new function within Digitaliseringsdirektoratet, or a joint program anchored in the Ministry of Digitalization. What it cannot be is no one.

What the private sector can contribute — and what it cannot

The private sector has a critical role to play, but it is not the role of building the foundational layer. Banks, operators, insurers, and technology companies can build services on top of a shared, open infrastructure. They can develop user interfaces, reporting tools, sector-specific taxonomy mappings, and value-added analytics. This is exactly how BankID worked: the state established the identity standard, and the private sector built an entire ecosystem of services on top of it.

What the private sector cannot do is establish the legal consent mechanism that allows cross-registry data access. It cannot mandate interoperability standards across agencies that answer to different ministries. It cannot resolve the governance questions about who is responsible for data quality when records drawn from Elhub, Miljødirektoratet, and Matrikkelen are combined into a single disclosure. These are questions of public authority, public law, and public accountability. They require government decisions.

SME Data Unlock, is doing what foundations can do: mapping the problem, building a stakeholder coalition, developing open-source AI-powered taxonomy-mapping tools, and demonstrating through use cases that the constraint is not SME capacity. The technology is available. The data exists.

The public-private partnership alliance structure is designed. What is needed now is for the government to step up and take ownership of the coordination layer that only it can build.

USE CASE: NORDFJORD SUBSEA SERVICES AS, STAVANGER

The Cost of Inaction

The cost of not solving this is not abstract. It is measured in green loans that SMEs do not apply for, framework agreements they lose because they cannot complete sustainability questionnaires, and capital investment in more energy-efficient operations that does not happen.

A 2025 Finans Norge survey found that 68% of Norwegian SMEs declined to apply for green financing, citing the reporting burden. This is not a measure of SME indifference to the green transition. It is a measure of an access barrier embedded in the infrastructure — and a barrier that government has the tools, the mandate, and the obligation to remove.

Norway has positioned itself as a global leader in digital public goods and digital public infrastructure. The 50-in-5 campaign, the Digital Public Goods Alliance, the A-ordningen, Altinn — these are not accidents. They reflect a deliberate national decision to treat shared digital infrastructure as a public good. SME Data Unlock is asking Norway to apply that same logic to sustainability data: to decide, as a matter of national policy, that the data SMEs need to participate in the green transition should flow as reliably and accessibly as electricity.

Call to Action

SME Data Unlock proposes to build that connective layer: an open-source, AI-powered taxonomy-mapping platform combined with a consent-driven data-sharing trust framework, anchored in Norway's existing digital infrastructure and jointly governed by the registries that hold the source data.

For the Norwegian oil and gas supply chain, this is not only a question of reporting efficiency. It is a green transition question. SME suppliers that cannot produce auditable sustainability data will lose access to green financing, lose framework agreement positions with operators moving toward mandatory CSRD compliance, and be unable to demonstrate the emissions reductions their clients increasingly need to account for.

The data gap is a competitiveness gap.

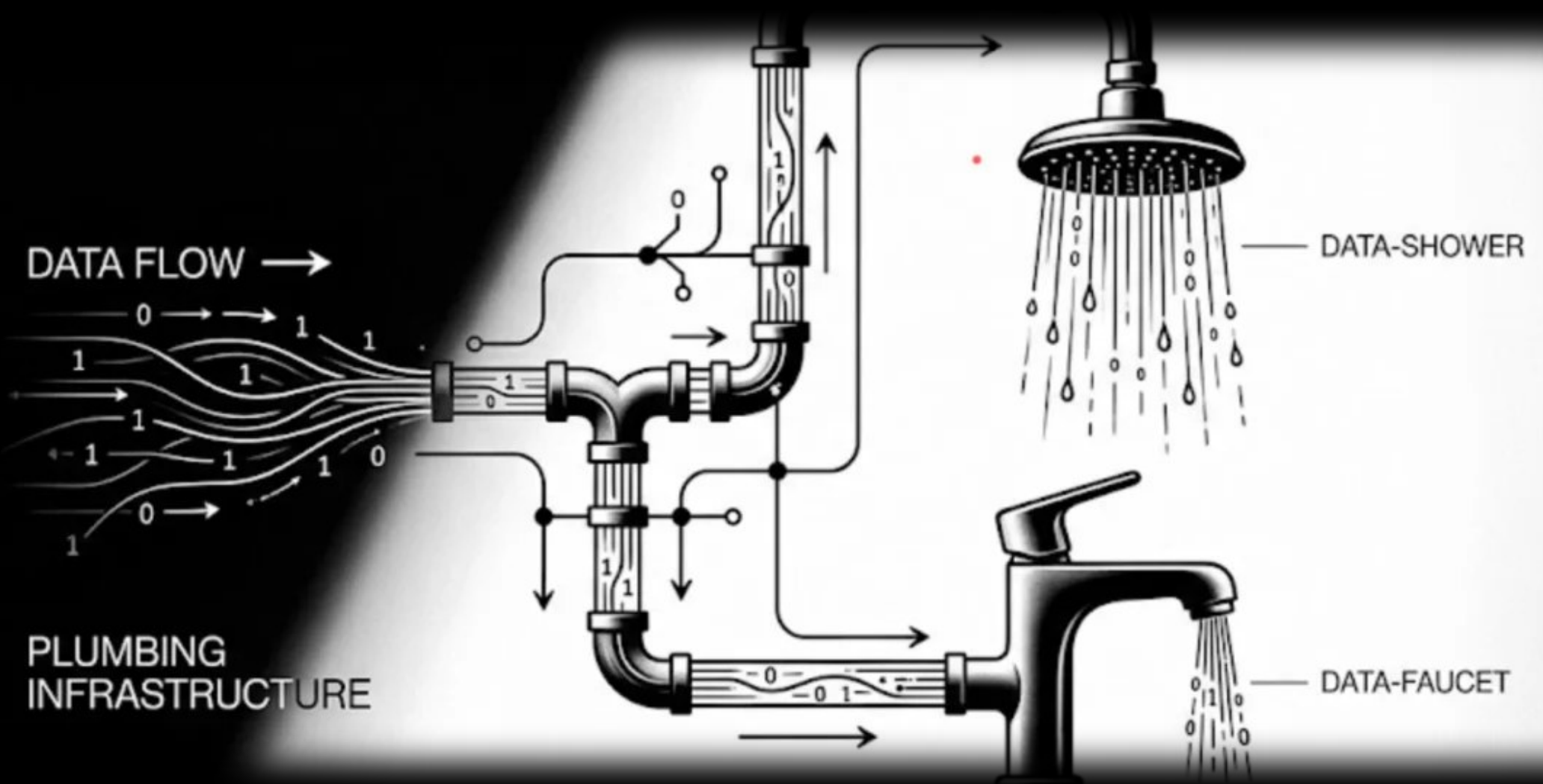


Join the SME Data Unlock Alliance today. Move your organization from data to unlocking it, and become a foundational part of the solution.

Imagine a world where sustainability, carbon and climate-related data flow seamlessly like water from a faucet.

In this world, SMEs are enabled to make timely, well-informed decisions based on trusted, audited data.

Businesses can harness the power of data to enhance their sustainability performance, while governments, regulators, policymakers, and investors can confidently rely on data to develop and implement effective environmental policies for informed investment decisions.





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Catherine is a co-founder of SME Data Unlock Alliance, an initiative of the Data Unlock collaboration platform which is focused on unlocking diverse sustainability datasets and building a digital-first global data infrastructure. As an attorney specializing in climate, disclosure, and digital technology, she shapes the initiative's legal and policy architecture. Her work ensures the open-source code and trust frameworks can effectively operate and scale globally.