— Chapter 11 —

The "Nordic Model" in the Middle East Oil Fields

How Shareholder Value Eclipses Corporate Responsibility

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Norwegian energy companies are known to use the "Nordic model" as part of their self-representations, as a business strategy, and as a potential competitive resource in their operations and interactions outside the Nordic countries. Yet, while Corporate Social Responsibility (CSR) in a Norwegian context might be doing exceptionally well, this is not necessarily the case with Norwegian companies abroad. In this chapter, I will discuss DNO ASA (Det Norske Oljeselskap, the Norwegian Oil Company) to cast light on how a private, Norwegian oil company responds to and negotiates CSR expectations both from the Norwegian government and from the countries in which DNO is situated. DNO is an interesting case, because outside of Norway, it operates only in regions characterized by weak states and low levels of democracy as well as in countries that have issues in the functioning of governance and high levels of inequality among its citizens. Understanding the ways in which CSR practices by a private, Norwegian oil company are understood by various actors can shed light on the role of the state in how CSR is implemented, and whether the nature of CSR initiatives is shaped by the expectations of the corporations' "host" and "home" government.

Since the early 2010s, Nordic countries have been considered global leaders in CSR and sustainability (Strand, Freeman, and Hockerts 2015), placing high on rankings such as the sustainability-adjusted Global Competitiveness Index (GCI).[1] Accordingly, Nordic actors engage explicitly with CSR issues and build on long traditions of stakeholder engagement (Midttun 2005; Strand et al. 2015), and social actors' (such as corporations, trades unions, and social organizations) take on accountability to build an inclusive society (Maon, Swaen, and Lindgreen 2017). The Nordic corporate actors are thought to lead CSR engagement in Europe and are regarded as models and sources of inspiration for CSR development (Maon et al. 2017). The reason for this success might be related to the Norwegian, and Nordic, model based on stable economic management, a regulated labor market with strong labor unions, coordinated wage formation, and a redistributive, tax-financed welfare state (see the introduction to this volume). CSR may also be a way for the Norwegian state to try, with varying success, to export the Nordic model, as in the case of Equinor in Tanzania (see chapter 8).

The Norwegian state is a major owner of companies in Norway and expresses that it is concerned about the conduct of Norwegian companies abroad.[2] This chapter asks: How are CSR and the expectations of the Norwegian government concerning ethical practices pursued by Norwegian companies operating outside the Nordic countries? Does the Nordic societal model and it's reputation of conducting responsible business shape how Norwegian private companies operate outside the European context? While this chapter views CSR partly as a neoliberal governance technique that can be used by various actors and whose setup varies partly according to the character of the state(s) involved, it also focuses on how it is understood differently by different actors. At the focus of my analytical attention are the ways that people perceived, talked about, and understood the work of oil companies and CSR.

The chapter is based on fieldwork and interviews in the Kurdish region of Iraq in addition to online sources, reports, and media. I pursued two weeks of fieldwork in Erbil, Duhok, and Tawke in 2014 as part of the Energethics project. Contact was mainly established through a social network developed over years of working in the region as a university lecturer. While many people were nervous about the theme of oil companies, they also were eager to share their experiences with an outsider. I spoke to thirteen men living in the Tawke village, three people working for DNO ASA, two people working for a different oil company in the region, two journalists, three students, and the natural resources advisor to the government (Ministry of Natural Resources, Kurdistan Regional Government, KRG, Erbil). While some of the conversations were conducted with the help of research assistant Dunya Slahdin Mirdan, who also in some cases functioned as a translator, several were done in English.

Many Kurds are well acquainted with English, having worked for several years with international NGOs or having been to Europe as a migrant or as a student. In the village of Tawke, I used a male translator. Notably, my informants were almost all men, given that those in formal positions relevant to interview happened to be men; the field of oil industry in Kurdistan Iraq, as in several other countries, is dominated by males; and, in the village, my contact person was a male head of the village, who gathered the male inhabitants for a common discussion. Lengthier fieldwork would have facilitated more communication with the women living in that village and broadened my insights of the situation but would most likely not have altered the main findings and arguments of this chapter.[3] Further, I made several attempts, through emails and calls, to meet DNO officials, but no one was willing to talk with me. Additionally, DNO management in Oslo did not respond to formal emails from the Energethics project leader. The lack of response is unfortunate. It might suggest a different approach to communication with outsiders compared to Statkraft and Equinor, who were willing to talk to the researchers in this volume.

After briefly introducing CSR from an anthropological perspective, I discuss what kind of company DNO is. Subsequently, I will present two empirical cases, the first being DNO's establishment of the oil field in the Kurdistan Region of Iraq in which I discuss the discrepancy between the government and the local community's experience of the company's CSR operations. The second case, DNO in Yemen, examines a mediated labor union conflict that led to a court case. For this case, I draw upon online documents and news media. In the discussion and conclusion, I draw attention to how DNO focuses on shareholder values, disregarding all expectations of the Norwegian state as to how Norwegian companies should operate abroad. Both the Kurdistan Region of Iraq and Yemen cases are suggestive of the company's instrumental relation to CSR and ignorance of workers' rights.

A Short Outline of the Anthropology of CSR

Anthropological studies have emphasized that the meaning, substance, and character of CSR practices will vary in different places and among different actors (Maon et al. 2017; Campbell 2007; Garriga and Melé 2004), making ethnographic studies of the phenomena essential. Adoption, management, and orientation of CSR are pursued in different ways at different temporalities of the operation (see chapter 4) and by different sectors of corporations and industries as well as in different regional and national contexts. Gond, Kang, and Moon (2011) point to the chameleonlike character of CSR: companies can shape their CSR according to new ideas and to the sociopolitical and economic context of its application. Through encounters with diverse configurations of actors and institutions, CSR is transformed and reconstituted (Welker, Partridge, and Hardin 2011; Dolan and Rajak 2016) and is highly adaptable (Dolan and Rajak 2016). This metamorphic character of CSR has contributed to the view among researchers that CSR materializes into a "global assemblage" (Collier and Ong 2005), spreading and acquiring new meanings and modes of capitalism through its contact with and enactment of private and state corporations, multinational enterprises, nongovernmental organizations, development institutions, social enterprises, and consultancies (Thrift 2005; Collier and Ong 2005: 11).

Increasingly, research has examined how corporations pursue CSR and how CSR influences local communities (Rajak 2011; Rajak 2016; Welker 2014; see also the introduction to this volume). Empirical studies have shown the lack of intentionality and consistency in CSR practices and that CSRs are frequently operationalized in response to external pressures and thus transpire reactively (Welker 2014). In this chapter, research on the ways in which the state is challenged, bypassed, or strengthened through CSR is particularly relevant. Providing a historical contextualization of CSR, Djelic and Etchanchu (2017) recall a persistently blurry and shifting frontier between economy and polity and that firms have long played a political role. The political role and its nature, extent, and impact have altered over time and changed with shifting dominant ideologies. Djelic and Etchanchu (2017) suggest that Friedman's "null hypothesis"—that the corporate executive is only responsible to the shareholders (Friedman 1970)—as a distinct separation between business and state responsibilities does not describe a natural state of things but is instead a particular perspective with anchors in neoliberal ideology. Scholars have investigated the ways in which structures of political authority are shaped by modes of energy production (Mitchell 2013) and the way in which state ideas and practices are coproduced by state officials, transnational companies, and civil society (Schubert 2020). Resource-extractive enclaves can produce fragmented political and social orders where state power and corporate strategies become intertwined (Ferguson 2005; Watts 2004). Companies' CSR practices interweave corporate risk management and community engagement in ways that trigger indirect government when statehood is limited

(Hönke 2011). Thus, extractive industries become actors in governmentality through resource extraction. The conglomeration of state power and private capital produces particular configurations of control over territories and populations (Buu-Sao 2021). While CSR can be a technique for nation-states to indirectly govern their territories (Billo 2015), companies can also interject in such governmental "discharge" (Hönke 2011), seizing CSR principles and filling in for the state by conducting social functions. The multivalent character of CSR in some cases contributes to the functioning of companies as proxy states, providing jobs, social welfare, and infrastructure and managing environmental issues (Welker 2014) concurrently as companies are instrumentalizing corporate codes and global compacts (Dolan and Rajak 2016).

In these descriptions, the state is characterized as being both present and absent, giving the impression of being thinned or "hollowed out" (Bridge 2010; Ferguson 2006). Simultaneously, neoliberal processes of production and extraction are characterized by dispersion of "power away from geographically defined nation states" (Duffy 2006: 93). In some cases, extractive companies manage to sidestep the state by drawing on local enclaving (Ferguson 2005) or forming partnerships with nonstate actors (Gardner 2012); other researchers call attention to the ways in which companies mobilize new power arrangements by means of different forms of corporate and local infrastructure, through which companies represent themselves as a caring actor and blame the state for negative causes and effects (Appel 2012).

Recognizing that CSR is a particular form of business-society interaction with historical twists and turns opens new ways for ethnographically exploring and understanding CSR and its role in a global neoliberal market. As the introduction to this volume has well argued, researchers have not sufficiently recognized the various ways in which state actors and institutions relate and respond to CSR processes. While research has shown that some multinational corporations bypass governments and take over state institutions' roles through the ways they implement CSR, states can also try to increase their power through CSR. Just as with any tool, machine, or concept, if CSR is transferred to another setting, we as anthropologists need to study what it becomes and does at a specific location. CSR is not an "immutable mobile" (Latour 1987); it is not a thing that does not change when transported, nor is it a directly transferable mobile from one region to another. It becomes "localized" (Welker 2014) and "domesticated" (Knudsen 2015).

One could argue that the multifaceted and multisided character of CSR makes it hard to study. Who is to decide whether or not a company is performing CSR sufficiently in a region? What should the criteria be, and according to whom? While many actors outside of the site of production or operation have important roles in CSR policies, much of the initiation, implementation, and renegotiation of CSR is framed locally and thus must also be studied locally. This chapter provides one small but important contribution to the study of the role that CSR can be given by state actors, companies, and the local population, and how it is understood differently by the actors involved. The chapter also casts light on the various ways CSR is approached by nation-states of different characters. The states involved in the CSR process in this chapter include states that build their (various degrees of) sovereign legitimation from their population and the international community in very different ways: namely, a state in becoming (Kurdistan Iraq), a state in chaos or with minimum capacity (Yemen), and a state that fronts itself as moral and just (Norway).

The Company DNO: Attentive to Shareholders and Profit

The Norwegian oil and gas operator DNO ASA was established in 1971 and is Norway's oldest oil company. It is a small private corporation in the world of oil business and is largely dependent on financial capital in an international market. Its shares are distributed among several international owners, including the Government Pension Fund Norway (4 percent), with RAK petroleum as the largest owner (44 percent) and holding the greatest decision-making power. RAK petroleum is a public limited company established under the laws of England and Wales, listed on Oslo Børs in Norway, and registered in the Netherlands. The largest shareholder (36 percent) and CEO of RAK petroleum is the Iranian-born Bijan Mossavar-Rahmani (a US citizen who resides in the United States). In 2011, the company merged with DNO international, in which it already held a 30 percent stake, increasing its shares in the Norwegian company. Mossavar-Rahmani became executive chairman of the DNO board of directors. DNO ASA is Norwegian in the sense that is it listed on the Oslo stock exchange and headquartered in Oslo. Further, three out of five members of the board of directors and five out of eight members of the executive management are Norwegian citizens, all with higher education from Norway. In this capacity, DNO ASA is obliged to follow rules and regulations of the Norwegian state abroad because it is a company considered to be Norwegian and is expected, as other Norwegian companies, to follow international regulations.

DNO is known for pursuing a business strategy characterized by "who does not dare, does not win" and "Risk and Reward" (Bøe 2017: 121).[4] In the 1990s, the company focused on operations in the Middle East and Africa, with economic activities in Kurdistan North Iraq, Yemen, Oman, United Arabic Emirates, Tunisia, and Somaliland. Its business model is the diligent use of network strategies, cost-efficient collaboration, keeping costs down, and timing, including at what point to enter a potential oil field and operating quickly (Bøe 2017). As Mossavar-Rahmani stated to the media: "We are in the oil sector. You have to be a risk taker. You like risk, you have the ability to control it, you have a balance that allows you to survive and the rest are opportunities."[5] The cowboy approach of the company is suggested by the former administrative director, Helge Eide, who, reflecting back on DNO's early history, expressed: "It went pretty fast in the turns many times, and we did not have good enough contact with our networks at this time. We shot from the hip and missed" (Bøe 2017: 205).[6]

Online, DNO presents itself, under "Mission and Values," in the following way:

> Our mission is to deliver superior returns to our shareholders by finding and producing oil at low cost and at an acceptable level of risk. DNO's DNA is to be first, fair and firm. We are driven to stay ahead of our competition—and ahead of the opportunities. We treat stakeholders fairly by adhering to high standards of governance, business conduct, and corporate social responsibility. We meet our commitments efficiently and transparently and expect the same of our suppliers, contractors, partners, and host governments.[7]

Their self-representation appears in sharp contrast to that of Equinor, the largest operator in Norway, which Strønen (chapter 6) quotes as "doing business with a clean conscience" and a concern with having a social footprint. Equinor was partially privatized in 2001, and while it has international ownership, the largest shareholder is the Norwegian state, with 67 percent held by the Norwegian Ministry of Petroleum and Energy. Although Strønen argues well that what is meant by Equinor's clean conscience depends upon what the company considers as its responsibility; the Equinor corporation's *raison d'être* versus that of DNO's is strikingly different. In DNO's "Corporate Social Responsibility Highlights 2018," DNO's approach to CSR is represented in the following way:

> Corporate social responsibility starts with identifying, understanding, and addressing the needs of all key stakeholders. Wherever we operate, we make a concerted effort to maintain mutually beneficial relationships with these stakeholders, achieved through open dialogue and efforts to balance their interests with our own as a public company with over 15,000 shareholders. In addition to balancing stakeholder interests, essential ingredients to DNO's success as a responsible and effective global player include our active engagement with local communities, the safety and security of our people and operations, a light environmental footprint, and zero tolerance for corruption.[8]

This online representation contrasts sharply with how DNO has been portrayed in the media and how local informants in the Kurdistan Region of Iraq talked about their experience with the company. Over the last two decades, DNO's operations have been under scrutiny by various actors, and their lack of openness concerning procedures and guidelines has been commented upon in the media and by the OECD National Contact Point for Responsible Business Conduct Norway. DNO has reached the public media both with titles related to charges on tax fraud ("Berge Gerdt Larsen [DNO Chairman of the Board] charged for fraud and tax evasion"[9]) and as the small oil company who is taking the lead in "The Race to Tap the Next Gusher" (*Time* May 2006).[10] DNO's operations in the Kurdish region of Iraq and in Yemen have been publicly critiqued and deemed controversial in different ways. To explore DNO's practice of CSR and how it responds to the Norwegian state's expectations of Norwegian companies, in the following I will discuss the cases in the Kurdish region of Iraq and in Yemen.

Case 1. The Kurdistan Region of Iraq: Expectations and Disappointments

Iraq holds the fourth largest proven oil reserves in the world, and in 2011, it was the ninth largest producer of oil globally. Much of that oil exists in the north, the Kurdish areas. After the fall of Saddam Hussein following the US-led invasion in 2003, the principle of federalism was included in the new Iraqi constitution in 2005. This legalized the Kurdistan Region of Iraq (KRI) as an autonomous federal region, which included a high degree of international sovereignty as well as its own parliament, armed forces, and government (O'Driscoll and Baser 2019). An oil and gas law was enacted by the KRG in 2007, based on Articles 111 and 112 in the Iraqi constitution (Hasan 2019). On this basis, the KRG signed more than sixty oil and gas contracts with international oil companies (IOCs). Consequently, a major dispute between the KRG and the federal government in Baghdad unfolded, as the KRG claimed a constitutional right to sign petroleum contracts and argued that the constitution decentralized the management of natural resources in Iraq (Natali 2012). Tension between the Kurdistan Region of Iraq and Baghdad concerning petroleum contracts in general continues and concerns the future of oil exploration and revenues; some of the large deposits of natural resources are in the disputed areas of northern Iraq.

The liberalization and opening of the petroleum fields as well as the constellation of production-sharing agreements brought new public and private partnerships to the Kurdish region (O'Driscoll and Baser 2019). Business deals with large oil companies began. This came with prosperity, bringing a level of political and economic stability that gave the impression of the KRI as "the other Iraq" (O'Driscoll and Baser 2019) or the "next Dubai." While the region has embarked on a long-term effort to build a democratic and well-functioning state structure, it is still characterized by corruption, high unemployment, distrust toward the government, kinship-defined power dynamics, and political turbulence. State investments in basic services have been fragmented and, in some places, scarce.

There are around six million inhabitants in the Kurdish region of Iraq who make up between 17 and 20 percent of the population of Iraq. After a short optimistic and peaceful period from around 2007 through 2010, the region again faced economic crisis, turmoil, and conflict as a consequence of strained relations with the Iraqi government in Baghdad and of the war against *Daish* (ISIS). Simultaneously, transnational cooperations have become important players in various sectors of the Kurdistan Region, including for infrastructure, construction work, and the oil industry. From being the source of war, violence, and suppression, oil is now transforming the semiautonomous state of the Kurdistan Region of Iraq into a global capitalist economy with neoliberal ways and means that have changed the patterns of production and consumption.[11] Its current economy is characterized by global connections, including investments by international oil and construction companies from China, Norway, South Korea, Turkey, and the United States, and the capital Erbil/Hewler is booming with construction work and migrant workers.

The Controversial Beginnings

As the first international oil company in the region, DNO signed what was to become a controversial production sharing contract (PSC) with the Kurdistan Regional Government in 2004. DNO's presence in Kurdistan was facilitated through networks and indirect contacts to the political leaders in the Kurdish region of Iraq, including the prime minister, Nechirvan Barzani. DNO country manager in Yemen Magne Normann contacted the Ministry of Foreign Affairs in Oslo before his visit to the Kurdish region of Iraq in 2004 to ask how the Norwegian government would respond to a possible oil engagement in Iraqi Kurdistan. Normann was warned unofficially that "to make a deal with the Kurds about oil in Kurdistan would be perceived as if a foreign oil company would make a deal with the [Norwegian] Sami about oil extraction in the Barents Sea" (Bøe 2017: 210).

For the KRG, cooperation with DNO was deemed important: the oil company entered a contract directly with the KRG rather than with the Iraqi authorities or "Baghdad," and this became part of the public discourse in statements from the Kurdish authorities in their struggle for greater autonomy and possible future independence. Iraqi authorities in Baghdad, on the other hand, sued DNO because it had negotiated with the KRG rather than with authorities in Baghdad. Thus, while national governments in some cases support nationally based corporations—both state and nonstate—as they seek to expand abroad (see the introduction to this volume), in this case DNO became part of politics by default: the Norwegian government stressed, if only unofficially, that any direct deals DNO made with the Kurds would be politically problematic, while for the Iraqi Kurdistan authorities (KRG), the company's direct contact was a welcomed political—as well as economic—support.

Today, DNO has three main explorations in the KRI (Tawke PSC, Duhok PSC, and Erbil PSC), with the Tawke area as a "world-class giant oil field" from which international export started in 2011. At the time of my interview with the natural resources government advisor (Ministry of Natural Resources, KRG, Erbil), the government was in the process of creating guidelines on CSR that the companies were to follow. That said, the local content included from the beginning an expectation that international oil companies should employ between 60 and 100 percent of their workforce locally. Yet, the government advisor argued that the nature of oil operations situated in remote areas made it difficult to fulfill this expectation: "It is local development in remote areas where people are conservative and poor—and so the government is not so strong in those regions. And they [locals] don't have so many skills. They are not sophisticated, and so it is difficult to implement it." He continued: "Qualified workers are not in that area. But the population see the oil companies in these areas, and they will have great expectations. They should not feel that they are ignored, they must be included." He argued that the KRG was developing a supporting infrastructure, although he did not provide any concrete examples: "The intention of the government is to draw up an instruction manual to follow up that role to local authorities in the area. To have good coordination with them. As a matter of courtesy, the companies must respect them [the locals]. This coordination is led by the major [in the area]. It needs to be localized."

The Kurdish region of Iraq has a so-called business-friendly climate that gives maximum rights to investors; there is, for example, no taxation system for international businesses. The natural resources government advisor told me during our interview that the KRG-implemented procedures, including complaints procedures, are followed by DNO. He suggested that "CSR from companies should not replace the government, but it should be a good gesture to the locality where you have invested."

In 2015, there was a financial crisis in the Kurdish region of Iraq, exacerbated by the influx of millions of refugees from Syria and budget cuts from Baghdad. Consequently, the government did not pressure the companies to pursue CSR activities. Further, KRG resolved part of their debt by selling KRG-owned shares to DNO, increasing DNO's share in the Tawke field from 55 to 75 percent.[12] Some years earlier, in 2008, a controversial sale of its shares led DNO to be investigated by Økokrim (the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime) for violating the obligations for ongoing disclosure.[13] Økokrim fined DNO NOK 20 million (approximately US$3.3 million) for market manipulation in connection with the sale of shares to the KRG.[14] DNO reached an out-of-court settlement. Bijan Mossavar-Rahmani said: "We agreed to pay a reduced fine, without admitting any liability, to bring an end to a protracted and costly distraction involving matters that predate the current executive management and board of directors of DNO International."[15]

The KRG natural resources government advisor told me that the Kurdish people demand so much from the government, expectations that the government cannot meet. The expectations from the KRG toward oil companies involve social investment projects: "The significant part of the project is to create coordination with the people." To do this, he told me, the production companies should conduct a demographic social study in the area and then draw up a plan for the social programs: "They have a plan that is renewable and can be redrafted based on the needs of the people. It's a localization policy:

that expats are to be replaced by local people." He explained that the community should be involved in the decisions of which projects to develop and the next steps. He expressed that the Kurdish population needs to distinguish between the oil companies and the government: if something goes wrong, "blame should be on the companies, not the government. The government must not be interrupted." As an advisor, he pays attention to that, and he is "very happy about what DNO is doing."

In contrast to the positive image of DNO provided by government representatives, journalists and scholars talked extensively about ongoing environmental issues—such as water shortage, air and water pollution, plastic waste, urbanization, geological imbalances, increasing numbers of cars, and destruction of agricultural areas—produced by oil companies in the Kurdistan Region of Iraq. What are the local population's expectations and experience of CSR conducted by DNO?

Local People's Experience of CSR: The Missing School

One day during my fieldwork in the Kurdish region of Iraq, I go to a village situated in Tawke to talk with the village inhabitants about their experience of the DNO oil drilling next door. The old road leading to the village is still a gravel road, but now village residents must also pass two roadblocks with security checks to enter and exit the village. The oil drilling is visible from the doorstep of the house of Ahmed, a man in his forties and father of three children.

The village men are gathered in Ahmed's living room; thirteen men are seated on the floor, leaning against the wall. The children are playing outside, and the women are not around except for Ahmed's wife, who serves us tea and water. After a short round of introductions and explanation of who I am and why I am there, Ahmed says, "We gave them our land, but they have not visited us even once." He is disappointed and frustrated. On the advice of the KRG and the village's muxtar (head of a village), he and his neighbors had leased land to DNO for an agreed amount of money. None of the measures promised had been met, they argue; the only thing they have gotten is a bad area for the children to grow up in. Living in a village situated some five hundred meters from Tawke—DNO's largest facility in Iraqi Kurdistan—the inhabitants no longer work in their fields, as these are occupied by pipes, other oil industry infrastructure, and grease. But they have no other work either. Ahmed, like his co-villagers, had believed they would receive better infrastructure for their remote

Figure 11.1. View from a village close to the Tawke field. © Synnøve Bendixsen

village and that the road from the village to the nearby town would be paved by the oil company, facilitating everyday life. They had also expected the company to build a school in the village. The villagers, I was told, had been informed that the men of the village would get jobs at the facility. But the only thing they had received, says Ahmed, was a new mosque.

The men in the village fear that the future will bring major health problems for all of them, in particular their children, because of living amid a whirlpool of gas, truck dust, and extraction dirt. They argue that a nearby village, where most inhabitants were Turkmen and thus Christians, had received a school built with money from DNO. They believe the differential treatment is due to the different ethnic and religious composition of the two villages. “All the villagers want today,” Ahmed says, “is to move from the village, but they cannot afford it,” continuing: “We feel like victims living in the heart of oil extraction without any of the benefits falling to us.” The other men seated on the floor express feeling cheated by the government and believe the international oil companies are making a fortune on their land, while they are left without anything but a bleak future. The idea that they had been promised more than they had received was shared by everyone in the village. The men blamed the situation on the lack of control and follow-up on the part of the Kurdish authorities rather than on the oil company.

The village population's distrust toward international oil companies and the government as well as their pessimism about what the oil drilling had brought the region were replicated in various ways by other Kurds I spoke to, including journalists, students, and oil company workers. Many blamed the KRG for not being hard enough on the oil companies and letting them do as they wish: "The KRG doesn't push the companies, because they are new, and they don't want to push—they want companies to come to Kurdistan." A geologist in Duhok, whom I interviewed, told me:

> In 2003, when DNO started with oil here, they started very badly. They cut down many trees, with long-term impact. Protesters talked to the government, but the government just said: "It is also so in the US." "Yes, but there they have regulations—they follow the instruction there," the protesters had responded, but to no avail. The companies don't take care of the residential areas. … And now people start to react. … DNO gave $200 per family for hotel and transportation and for three days to evacuate the village. These people were evacuated for one to two days.

He believes that the muxtar (village head) took the compensation and did not give much of it to the villagers. Further, he adds, evacuation is not a matter of two to three days: "Oil wells are bad socially and for children. When you make a dam, for example, you must evacuate people for a long term, not short." Although the KRG tells the international oil companies to "please take care," the geologist believes that the KRG does not push the companies enough: "It is temporary solutions the whole time. The only permanent solution is about making oil fields." He talks about the environment, and how the last rain in the region included acid and oil: "The polluted rain is not from particular DNO activities or from one of the other companies—it is from all! The combination. Villages are very close to the oil activities, one kilometer." When we finish our talk, he adds that people are

> afraid to write about this in the newspaper. This is a matter of oil; it is a secret, so you will be under pressure. Security forces will tell you to be quiet. We only speak about this with a low voice. Sometimes there are demonstrations in certain areas. Then they give them money, and they will be quiet, they [the former protesters] then say: "It is not my problem, it is the problem of KRG." … Because of high unemployment, a small amount of payment is enough to keep people quiet.

People in the villages and beyond expressed that they were overwhelmingly dissatisfied and disillusioned by the international oil companies and the government's policies on energy. One Kurdish journalist, who had investigated the CSR of companies in the Kurdish region of Iraq, commented on the CSR report of DNO: "A drop of water in the sea: they made a road which they needed for their own company and put that in the report! People are very religious, and so they made a small hall for religious meetings, for funerals, etc., and said that this is CSR!" He added: "The government has no clear plans for CSR. It is a matter of capacity building—they do not know how to raise this issue or work on it." His comment resonated with other informants in the region who believed that the KRG put blame on international companies for insufficient social responsivity without making sufficient efforts to ensure that their CSR expectations of these international companies were clearly stated and followed up. Many local informants also criticized the KRG for not engaging and interacting with the local communities affected by oil operations. They expressed dismay and distrust toward the KRG's management of international oil companies and had lost faith that the black gold would benefit their local communities in any way, for example by providing jobs.

Actors involved in CSR have different objectives and expectations. The government seeks CSR to create goodwill from its population and, ultimately, to facilitate continued expansion of oil operations. Governing in a fragile democracy, the KRG needs to make evident to its citizens that it is making demands on international companies with regard to CSR. Yet, its limited experience with international companies, malfunctioning government, and undeveloped legal regulations may be reasons for their failure to regulate and monitor the CSR practices of DNO ASA (and other multinational corporations).

Examining the CSR highlight reports available online, one finds the image of a company that is profit and shareholder-value oriented; the reports are directed toward the international financial market and show less commitment to CSR standards. Performing on-the-ground assemblages of CSR appeared important in the company's relation with the KRG. It seems as though the need to make things work locally involves transactions with local and national authorities, and that this is articulated as CSR. The company's approach to CSR looks to be more about continuing and expanding its business without interruptions from the government or population, expending as few resources as possible.

The locals' expectations of CSR included the implementation of projects in a way that will benefit the local community. The outcome of the CSR practices during my fieldwork was that representatives from the KRG claimed to be satisfied, though they were also concerned that any failure on the part of an oil company to meet CSR standards would boomerang on the government with increased distrust and dismay. We see in the village that, indeed, the government was held responsible for the disappointing CSR effects. It suggests that when CSR fails, the government risks being blamed.

The image left is that of an oil company preaching vague promises about CSR measures combined with a lack of control mechanisms from local, regional, and national authorities. This situation facilitates keeping costs for CSR down and limiting the time and effort expended on implementing CSR. For the oil company, talk of CSR is a way by which their presence in the region is legitimated. Yet, on the ground, the population expressed being exploited by the company, and the situation increased distrust toward the authorities. Poor management or potential mismanagement of CSR—here taking the form of a lack of concrete promises or creating a mismatch between expectations and implementation—can have serious ripple effects beyond the financial; there are negative effects on democracy building in weak states, such as the Kurdish region of Iraq.

I turn now briefly to the second case, from Yemen, to examine whether the low CSR input and lack of transparency in the Kurdish region of Iraq is an exception or part of more general trends and character in the operations of DNO.

Case 2. Yemen: Strike and Workers' Rights

Yemen is one of the poorest countries of the Arab world. Scholars have suggested that rather than calling Yemen a "failed state," actors in Yemen are using the production of chaos (Blumi 2011) to receive international funding (Dingli 2013). The strategy of simulating statehood, argues Dingli (2013), was one way in which the Yemeni regime ensured funding, facilitating the continuation of functioning power structures. The outbreak of civil war in 2014 exacerbated existing economic challenges, brought increased unemployment, and created a humanitarian crisis. At the same time, Yemen has large proven oil reserves, with the first commercial discovery in 1984. DNO had at one moment six oil fields in the country, yet their operations ended with criticism from labor unions and employees.

After a brief hesitation, DNO accepted an invitation from Dove Energy Ltd., a smaller English oil company, to collaborate on an oil project in Yemen in 1997 (Bøe 2017). Yemen was interesting because the price of licenses was cheaper than in other places and the costs of drilling wells less than offshore. Thus, the break-even price was lower than most other places. DNO budgeted the first operation to be $23 million, considered by other companies as unrealistically low. This, apparently, was to send a signal to those delivering tasks and activities that "nothing would be wasted": "Those who are not delivering will not be given a new chance" (Bøe 2017: 137). The time schedule was also made implausibly tight with the intention that work should be "quick and effective." To accomplish this, the company reduced the number of people engaged in the field to a minimum and made decisions hands-on, "with few negotiations, time-consuming evaluations and unproductive bureaucracy" (Bøe 2017: 138). Notably, the first Tasour field operation in Yemen was achieved with even lower costs than budgeted (at $13 million) and only two months delay. For some years, DNO's operation in Yemen was considered a success as explained by their "business model, the countercyclical network strategy, risk-reward philosophy, increased extraction and not least, timing" (Bøe 2017: 146).

Yet, in 2013 and 2014, workers went on strike because they were paid less compared to other companies. For example, an engineer was paid around NOK 5,000 (around $800 in 2014) per month by DNO, the lowest among all oil companies in Yemen.[16] DNO management responded with the written notification that they would fire all workers who went on strike. This violated the statutory right to strike in Yemen. Following the outbreak of war in the spring of 2015, DNO and several other international oil companies, such as Total and Dove, stopped all operations in Yemen. In June 2015, DNO notified the workers by SMS and email that they had been dismissed. This was in sharp contrast to the obligations DNO had accepted when initiating their operation: the law of Yemen states that if a company is granted a license to operate a field, the company must pay wages and honor social obligations to the workers so long as the company has a license. If the company wishes to terminate operations before the license period is over, the company must hand over the entire operation, including oil fields and workers, to the state.

Consequently, DNO faced a law court in Yemen, and in 2016 the company was ordered to pay their workers and to fulfill their obligations.[17] After losing their appeal, DNO was charged to forcibly recover the wages of the workers. Considering that DNO had in the meantime initiated new operations in Iran, the company's argument that their assets were too low to pay was not considered credible. The court seized DNO's properties, bank accounts, and cars in Yemen.[18] Nonetheless, according to the federal secretary of Industry Energy (the Norwegian trade union for those who work in the industry and energy sectors), the workers were not remunerated because at this point DNO did not own much in Yemen.

In an interview with Industry Energy, Ryadh Al-Gharady, the leader of the trade union for the workers in DNO Yemen, criticized DNO: "Our case is that DNO has treated us inhumanely and illegally. It is the only oil company in Yemen that has laid off workers and not paid wages. The families of the workers are suffering and lack money for food." He added: "We want to take the case not only on a national level but also internationally and hold DNO responsible for their actions."[19] Email campaigns and media coverage reporting bad treatment of workers in Yemen figured also in Norway. Industry Energy filed a complaint against DNO on behalf of the Yemeni trade union to the National Contact Point for Responsible Business Norway (NCP) whose primary task is to promote OECD guidelines for multinational companies and help resolve complaints that may arise in connection with an alleged failure of compliance with the guidelines.[20] The central point of the complaint was that DNO did not comply with OECD Guidelines: Chapter I, Section 2, "A company's first obligation is to comply with national laws," and Chapter V, Section 4a, "Comply with standards of employment and the employer-employee relationship which are no less favorable than those followed by similar employers in the host country."[21] DNO rejected participation in mediation and requested that most of the company's letters to the Contact Point be kept confidential, including in relation to complaints. In its final statement (22 March 2018), the NCP held that DNO did not comply with the OECD guidelines in parts of Chapter V.[22] Industry Energy also criticized the fact that DNO had opposed the employees' right to organize in trade unions and conduct collective bargaining in Yemen. The NCP did not find any grounds for DNO *not* to meet the expectations of the right of workers to join trade unions.[23] The NCP critique was extensive: "The National Contact Point recommends that DNO in future carry out risk-based due diligence assessments and show greater transparency in its guidelines and procedures for responsible business activities."[24] They also recommended that, in future, DNO "respect the National Contact Point Scheme's complaint mechanism, which is central to the OECD's guidelines, and co-operate with the National Contact

Point in good faith; map out what are comparable wage conditions in Yemen and apply these; follow up on its promise to enter into wage and post-payment agreements in keeping with Yemeni law."[25]

DNO responded initially that the complaint by the NCP was neither submitted by a party affected by the circumstances concerned by the complaint nor sufficiently founded or documented. They argued that the complaint was based on mere allegation.[26] In response to the final conclusions of the NCP, DNO argued that the Yemeni court decision had not been adjudicated correctly, arguing that toward the end of the process new judges had been appointed who had "questionable legal competence." DNO also expressed little confidence in the handling of the complaint by the NCP.[27]

The NCP does not have any sanctioning authority. Yet, the "un-Norwegianness" of DNO's actions and lack of ethical approach overseas were highlighted, although not highly mediatized, in the media. The adviser to Industry Energy argued in the media that "we like to believe that Norwegian companies have ethical values that make them behave properly towards their employees. Here at home, they usually do. But not always abroad. The oil company DNO is one of the worst."[28] DNO was also depicted as particularly undesirable compared to other international oil companies in Yemen. As a consequence of the mismanagement of its workers in Yemen and the outcome of the court ruling, the Norwegian trade union, Industry Energy, warned shareholders and partners against DNO. So far, these warnings have had little, if any, effect on shareholder behavior, nor have they led to any real effects in the Norwegian government's approach toward DNO ASA, as will be discussed next.

Discussion: License to Operate and Its Depoliticizing Effect

How does DNO relate to the "expectations" set forth by Norwegian authorities? The Norwegian government highlights that companies are expected to develop their own CSR standards, establish mechanisms for whistleblowing, and show transparency in the economic, social, and environmental consequences of their operations. State- and non-state-owned Norwegian companies are reminded that "Norwegian companies operating abroad are often equated with the Norwegian state, and their conduct is therefore also important for Norway's reputation."[29] The Norwegian minister for development aid (in 2018) has expressed great faith that Norwegian business and industry are the best in class in terms of social responsibility. The government also "considers it important that the trade union movement is involved in the company's work with social responsibility."[30] The Norwegian state does not require corporations abroad to follow a "Nordic model" but instead to follow universal standards, including applying the International Labor Organization's (ILO) core conventions to "establish notification routines for their activities abroad"[31] and pay attention to certain values (see the introduction to this volume). Companies that operate in countries that top the UN corruption index,[32] such as the countries in which DNO operates, are expected to take care to contribute to transparency concerning cash flows.

The two cases discussed here suggest that DNO initiates their operations and pursues their activities by accepting high risk and active use of social networks, personal contacts, and patronage in their region of operations. Disrespect of workers' rights is clear-cut in the Yemen case and conceivable in the Kurdistan Region case. CSR is not grounded in the operation of the company but, rather, pursued haphazardly to avoid the most stringent criticisms in the country of operation. While it becomes an informal requirement for license to operate (Nielsen 2013; see also chapter 7), it does not provide the company legitimacy to operate from the perspective of the local population due to its bad management or lack of implementation. Legitimacy is here understood as "a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs and definitions" (Suchman 1995, 574).

While the Norwegian authorities have expressed a particularly low threshold for corruption in companies both nationally and abroad, the court cases against DNO through the years suggest that this is of lesser concern to DNO. Additionally, the Sustainability Disclosure Database GRI reports that DNO has an "incomplete profile" and that "this organization has not yet disclosed their sustainability opportunities [and risks] on this profile."[33] DNO reports have frequently been criticized for incompleteness and lack of transparency. Its first country-by-country report is deficient according to the regulations on such reporting (Weum and Mohagen 2015).[34] Their land-for-land report for 2014, for example, lacks information, such as the status of internal interest costs, complete information on taxes paid in kind, the omission of tax information to the Kurdistan Region of Iraq, and the difference between income figures in the country-by-country report and the annual accounts, which should have been relatively easy to include (Weum and Mohagen 2015). DNO's corporate social responsibility highlight reports (2014, 2015, 2016, 2018) are characterized by being short, generic, and imprecise. While the court case in Yemen is closed (although the workers have yet to receive their salaries), there is an ongoing lawsuit by Iraqi lawyers against DNO in the labor court of Erbil. The lawsuit concerns the breaching of employment laws of the federal Republic of Iraq and the regional employment laws of the Kurdistan Region of Iraq.[35] It points to a lack of concern for labor rights and the lack of functioning mechanisms for whistleblowing as well as DNO's failure to follow Norwegian governmental expectations for the role of trade unions. DNO practices are important beyond the company's specific operations, considering that smaller companies on a world basis, such as DNO, might be seen as forerunners, laying the groundwork for larger companies that later buy the smaller companies' licenses when fields are up and running, expanded, and appear more stable.

Researchers have importantly alluded to the depoliticizing effects of CSR in other contexts, "that is, how it stops critique by bathing the corporation in a virtuous hue that masks the pathologies of capitalism" (Dolan and Rajak 2016, 21). In this case, there is another depoliticizing effect of CSR: namely, that national authorities in Iraqi Kurdistan and Yemen can blame the transnational corporations (TNCs) for a lack of real cooperation with the local population and for not paying heed to their own failure to standardize CSR through policies, laws, and regulations or to provide proper services themselves. One of the main consequences of the CSR practices of international oil production companies, such as DNO, and the KRG approach to international companies is the proliferation of distrust toward the local and national government by the population, detrimental to the ongoing formation of a well-functioning democracy.

Industry Energy reports that DNO has not complied with OECD guidelines for responsible business or with the UN's guiding principle for business and human rights (UNGP).[36] In his online blog, Leif Sande (former head of Industry Energy) states, "I would like to urge everyone who comes into contact with these bandits not to make any promises about licenses on Norwegian soil. This is a company that should have been kicked out—on their head and ass. After several court judgments, they continue to deny people the salary they owe them."[37] Yet, the Norwegian state has not blocked DNO from entering Norwegian waters: having not had a presence on Norwegian soil since 2007, DNO has recently been given licenses to operate in Norway and thus has been neither reprimanded nor penalized for their lack of following the Nordic model or more general CSR standards. The lack of adherence to expectations and a negative reputation apparently do not bear any consequences for their interests in the Norwegian waters.

Conclusion

The practices of social responsibility by DNO in the Kurdish region of Iraq and in Yemen reflect exceptionally bad divergences from the archetype known as the Nordic model. DNO's practices of CSR in the Kurdistan Region of Iraq and in Yemen are characterized by swift entrance to the market, limited CSR practices, and deep frustration among the local population. The locals' experience that DNO did not fulfil its CSR obligations in the Kurdish region of Iraq, a view that appeared to be shared by the broader population, was largely blamed neither on the corporation nor on the role of the Norwegian state but rather on the authorities in the Kurdish region of Iraq. CSR was thus not considered merely as the international corporation's responsibility, as in the case of Hydro in Brazil (see chapter 4).

While one might have expected that the lack of transparency, neglect of workers' rights, and limited CSR programs abroad could backfire as the company seeks to again become an actor in Norwegian waters, so far there have been no repercussions. Lack of compliance with the Norwegian government's expectations abroad has had little aftereffect in terms of access to licenses and thus economic consequences for misdeeds. So far, poor CSR has not limited this privately owned company's capacity to pursue business opportunities—even in Norway.

The acceptance, through the provision of licenses in Norway, by the Norwegian state of a company whose ethical practices and the reputation of its operations abroad are far from what is represented to be the Nordic model, signals a moral double standard by the Norwegian authorities. It might also suggest the limitations of the Norwegian state in promoting the Nordic model or their limited power of intervention when companies abroad are not following the Nordic model of corporate conduct. Yet, when the Norwegian state is less concerned with how Norwegian companies, although privately owned, operate abroad or whether the government's expectations beyond the international regulations are met, the Nordic model may turn out to be considered as only relevant when operating in the Nordic region and thus viewed more as an exception than a rule.

This is particularly the case if operation of the Nordic model is dependent upon a host state that is already familiar with the model—not only international CSR practices—and has state institutions with the means and power to ensure implementation. There may be little incentive for companies to follow CSR practices with a long-term perspective, but they may find it useful, rather, as a minimum practice for operations to facilitate and simplify the progress of an oil project in the short term. Lack of real (economic) consequences might contribute to erode the idea and ideal of a Nordic model in the longer run and dwindle its value as a resource.

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Notes

1. The Nordic countries top the Transparency International Corruption Perceptions Index (with Denmark at a shared number 1, Finland and Sweden at number 2, and Norway at number 7 in 2020), suggesting low levels of perceived corruption across the Nordics. Midttun, Gautesen, and Gjølberg (2006) suggest that at the European level the Nordic corporations score best on CSR initiatives (see also Strand et al. 2015; Maon et al. 2017).
2. This is spelled out in their white paper on corporate social responsibility in a global economy: "The Government assumes that Norwegian business and industry will be

among the foremost in demonstrating social responsibility based on a good value base, awareness and reflection." Meld. St. no. 10 (2008–9)—retrieved 7 July 2021 from regjeringen.no.

3. My research intention was to return to the region in the following year; yet the *Daish* (ISIS) situation prohibited my return. Although I had not conducted fieldwork in this region in the past, I am familiar with the region as I worked as a university lecturer in Erbil for three semesters, 2008–9.
4. The book about DNO by Bøe (2017) was contracted by Berge Gerdt Larsen (DNO chairman of the board).
5. https://finansavisen.no/nyheter/energi/2015/05/forvalter-om-dno-loennen-spiller-ingen-rolle, [Manager about DNO: Salary does not matter], accessed 20 April 2021.
6. Author's translation from Norwegian: "Det gikk ganske fort i svingene mange ganger, og vi hadde ikke god nok kontakt med nettverkene våre i denne tiden. Vi skjøt fra hoften og bommet."
7. From DNO's online homepage: Mission and values | About DNO | DNO ASA, accessed 20 June 2021.
8. From DNO's online homepage Mission and values | About DNO | DNO ASA, accessed 2 May 2021.
9. In BT: Berge Gerdt Larsen tiltalt for bedrageri og skattesvik (bt.no) [Berge Gerdt Larsen charged with fraud and tax evasion], accessed 4 May 2021.
10. "The Race to Tap the Next Gusher," *Time*, 16 April 2006. From online: Kurdistan is rich in oil resources, Kurds are ready to deal (ekurd.net), accessed 20 June 2021.
11. There are more than 2,250 functioning foreign companies in the Iraqi Kurdistan region including Arabic companies (Ministries of Commerce and Industry, KRG). Oil companies include BP, CNPC, DNO, Lukoil, Eni, Occidental, Kogas, Shell, ExxonMobil, Petronas, Sonangol, and Total.
12. https://e24.no/olje-og-energi/i/jPynXn/dno-sjefen-kan-ha-skutt-gullfuglen-brikkene-falt-paa-plass [DNO boss may have shot the golden bird. Pieces fell into place], accessed 14 May 2021.
13. Økokrim etterforsker DNO-saken—Økokrim (okokrim.no) [Ecocrime investigates DNO case], accessed 14 May 2021.
14. Millionbøter til DNO for markedsmanipulasjon—Økokrim—Tips en venn (okokrim.no) [Million fines to DNO for market manipulation], accessed 12 May 2021.
15. DNO International Settles ØKOKRIM Claim | Announcements | Investors | DNO ASA, accessed 12 May 2021.
16. https://www.industrienergi.no/nyhet/dno-tvinges-a-betale-arbeiderne/ [DNO forced to pay the workers], accessed 15 June 2021.
17. Norwegian oil company DNO targeted by unions | IndustriALL (industriall-union.org), accessed 10 June 2021.
18. Arbeidere lider på grunn av oljeselskapet DNO—Industri Energi [Workers suffering because of the oilcompany DNO] (translated from Norwegian, accessed 2 February 2021), see also Dette selskapet må lempes på hode og ræva ut av norsk sokkel. (leifsande.no) [This company must be kicked in the head and ass off of the Norwegian shelf].
19. https://www.industrienergi.no/nyhet/dno-tvinges-a-betale-arbeiderne/ [DNO forced to pay the workers], accessed 15 June 2021.
20. The OECD guidelines are recommendations for responsible business and good practice for all types of companies in all sectors and builds on internationally recognized standards. The guidelines have recommendations for transparency, human rights, employment, and workers' rights, the environment, bribery and blackmail, consumer interests, science and technology, competition, and taxation. They contain voluntary, nonlegal recommendations, while there is a clear expectation from the authorities that companies comply with the Guidelines.

21. Industri Energi klager DNO inn for Norges OECD-kontaktpunkt—Industri Energi [Industry Energy complains DNO to Norway's OECD contact point], accessed 5 July 2021.
22. Slutterklæring-Industri-Energi-DNO-II-FINAL.pdf (regjeringen.no), accessed 6 July 2021.
23. Slutterklæring Industri Energi DNO ASA—Ansvarlig Næringsliv (responsiblebusiness.no), accessed 10 June 2021.
24. https://www.responsiblebusiness.no/nyheter/slutterklaering-industri-energi-dno-asa/?fbclid=IwAR3UvagvtVdXhxL8mX4xC9Ztkm0W3soAz8jo3PpsP9yuPzRRvdVO4AoPLvY [final declaration industry energy dno-asa], accessed 10 June 2021.
25. https://www.responsiblebusiness.no/nyheter/kontaktpunktets-slutterklaering-i-klagesak-industri-energi-dno-asa-ii/?fbclid=IwAR3ygNKtB8W_cLiAU61vGfCWitnSYKHSWJDyuScAAaclzHmDr2G26GSK-R4 [Contact point closing statement in complaint case, industry energy dno-asa], accessed 10 June 2021.
26. Specific-instance-DNO-Industri-Energi-English_090517_-1.pdf (regjeringen.no), accessed 7 July 2021.
27. Skarp kritikk mot oljeselskapet DNO (aftenbladet.no) [Sharp critique against the oil company DNO], accessed 7 July 2021.
28. Arbeidere lider på grunn av oljeselskapet DNO—Industri Energi [Workers suffers because of the oil company DNO], translated from Norwegian, accessed 2 February 2021.
29. Meld. St. no. 10 (2008–9)—regjeringen.no, accessed 7 July 2021.
30. Meld. St. no. 10 (2008–9)—regjeringen.no [Corporate social responsibility in a global economy—Report no. 10 (2008–9) to the Storting], accessed 7 July 2021.
31. Meld. St. no. 10 (2008–9)—regjeringen.no, [Corporate social responsibility in a global economy—Report no. 10 (2008–9) to the Storting], accessed 7 July 2021.
32. Global Corruption Barometer—2013—Transparency.org, accessed 8 July 2021.
33. See SDD—GRI Database (globalreporting.org), accessed 16 June 2021.
34. https://openaccess.nhh.no/nhh-xmlui/bitstream/handle/11250/2382953/masterthesis.pdf?sequence=1&isAllowed=y, accessed 17 June 2021.
35. https://telematique.co.uk/wp-content/uploads/2020/01/IraqLawyer_spokesperson_DNO_ASA_28-Nov-2019v2-2.pdf, accessed 16 June 2021.
36. https://www.industrienergi.no/2018/07/03/dno-asa-ein-omsynslause-profittjeger-eller-eit-ansvarlege-selskap/ [DNO ASA: a careless profit hunter or a responsible company], translated by the author from Norwegian, accessed 15 June 2021.
37. Dette selskapet må lempes på hode og ræva ut av norsk sokkel (leifsande.no) [This company must be kicked in the head and ass off of the Norwegian shelf], translated by the author from Norwegian, accessed 16 June 2021.

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