



Small groups, local hands, electric routes.

How a small Bergen tour company travels, pays its guides and works with its neighbours, and where we still fall short.



“We take the train, the light rail and the electric boat, because that is the Vestland we want our guests to see.”

COMPANY

Mountains and Fjords Guiding AS
Org. no. 934 160 215 · Bergen, Norway

REPORTING PERIOD

1 January to 23 September 2026
with 2025 for comparison

**PREPARED WITH REFERENCE
TO**

EFRAG VSME, Basic module
GSTC criteria for tour operators



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About this report

This is our first sustainability report. It covers Mountains and Fjords Guiding AS from 1 January to 23 September 2026, which is the whole 2026 tour season so far. Figures for 2025 are shown where we have them, so readers can see the direction of travel.

The report is prepared with reference to the EU's voluntary standard for small companies (EFRAG VSME, Basic module) and the GSTC criteria for tour operators. We follow their structure, but we have not had the report checked by an outside auditor.

We are a very small company. Where we have measured something, we say so. Where we estimate, the figure is marked **ESTIMATE** and the method is explained in Appendix A.

Contact

Tonje Sophie Dunder, managing director
booking@mountainsandfjords.com
mountainsandfjords.no



01 · A WORD FROM THE OWNERS

Why a company our size writes this

We started Mountains and Fjords Guiding with sustainability as the starting point, not as something added later. We wanted to show Bergen and Vestland the way locals see them: on foot, by train and by boat, in groups small enough to talk to. Every tour was designed that way from the first day, and we have never used diesel boats or private cars to move our guests.

Along the way we have made choices that cost us money. We chose the electric boat on the Nærøfjord, and chose not to offer a Sognefjord tour on a diesel express boat. We never use private cars or minivans to move guests. We pay our guides properly even when only one guest turns up.

From 27 September 2026, new EU rules mean that any company that talks about sustainability has to be able to prove it. We think that is a good rule. This report is where we show our evidence, and where we are honest about what we have not solved yet.

We are two siblings who own and run the company together, and three guides. We do not have a sustainability department. What we do have is a clear idea of the kind of company we want to be, and the willingness to be measured against it.

**Tonje Sophie Dunder and Andreas Viskedal
Øverli**

Owners, Mountains and Fjords Guiding AS

WHAT SUSTAINABILITY MEANS TO US

- **People:** fair pay, safe work and respect for guides and guests.
- **Fairness:** the person doing the work should not carry the risk of a quiet day.
- **Economy:** a fair share of what guests pay goes to guides, local attractions and operators.
- **Climate:** every motorised leg on electricity where it exists.
- **Environment and footprint:** small groups that leave little trace.
- **Culture:** stories told by people who grew up with them.



02 · WHO WE ARE

A small Bergen company with three tours

Mountains and Fjords Guiding AS is a family-owned company, founded in Bergen with sustainability as its starting point. We sell guided small-group tours through our own website and through online travel platforms, and we work with a small team of local guides.

Stave Church tour

Bergen centre, the Fløibanen funicular to Mount Fløyen, the Bybanen light rail to Fantoft Stave Church, and a historic cellar tavern. About 4.5 hours, on foot and by electric rail.

Haakon's Hall and Bryggens Museum

A mostly indoor walking tour of medieval Bergen, built for rainy days. About 3.5 hours, entirely on foot. First offered in 2026.

Flåm day trip

Bergen to Flåm and back by train, the Flåm Railway, an electric boat on the Nærøfjord and a coach from Gudvangen to Voss. A full day with the same guide throughout.

Key figures

	2025	2026 TO DATE
Operating revenue (NOK)	32 600	54 019
Operating result (NOK)	-7 468	-5 147
Guided departures	13	14
Guests guided	32	about 30
Guests per departure	1 to 4	1 to 6
Most common group size	2	2
Guides employed	0	3
Maximum group size	8	8

Revenue and result from the accounts (Tripletex, unaudited). Platform payouts are booked after commission, so revenue is shown net. 2025 departures and guests are counted from booking confirmations, 2026 from guides' after-tour reports.

How guests book

Most bookings in 2026 came through online travel platforms, which charge a commission of up to 30 per cent. Our own website, built on the Bókun booking system, is growing. Every direct booking leaves more money with our guides and with the company.

Ownership and management

The company is family-owned: the two owners are siblings, one woman and one man, and they run it together. There is no outside investor. The owners drew no salary from the company before September 2026.

NACE 79.90 · Registered in Norway · Company form: AS



03 · AT A GLANCE

2026 in numbers

Every figure on this page is explained later in the report. Figures marked **ESTIMATE** use published emission factors rather than our own measurements.

100%

of motorised legs on the Stave Church tour run on electricity in normal operation: the Fløibanen funicular and the Bybanen light rail.

Operators · page 7

0

private cars, minivans or diesel boats used to move guests on any tour.

Tour design · page 7

8

guests at most per guide. The same guide stays with the group for the whole tour.

Booking settings · page 9

0

injuries or incidents on tours in 2026. Guides report after every tour.

After-tour reports · page 9

1

business flight in the period. Management work between Stockholm and Bergen is otherwise done remotely.

Travel log · page 8

0

guest payment details entered into AI tools. Two people in the company use AI, always with human review.

AI practice · page 12

Emissions per guest on a full day, Bergen to Flåm and back **ESTIMATE**

Kilograms of CO₂-equivalent per guest for the whole round trip. Our route compared with the same day by diesel coach.

■ Our route ■ Typical alternative

Our Flåm day

train, Flåm Railway, electric boat, coach



≈ 3.1 kg

Same day by diesel coach

about 350 km, half the seats filled



≈ 14 kg

The coach from Gudvangen to Voss is counted as diesel, because its energy source is not yet confirmed. Method in Appendix A.



04 · WHAT MATTERS MOST

Choosing what to report on

We looked at each topic in two ways: how much our business affects people and nature, and how much the topic affects our business. This is called a double materiality assessment. Topics in the top right matter most.



Our own assessment, September 2026. Position shows relative importance, not a measured score.

Who we listened to

GROUP	HOW
Guests	Reviews on booking platforms and conversations on tour
Guides	After-tour reports and direct dialogue about pay and routines
Transport operators	Published data from Skyss, Vy, Fløibanen and fjord boat operators
Local partners	Tavern, pub, museums and attractions on our routes
Booking platforms	Supplier terms and their notice on the new EU rules

What came out on top

Transport emissions, fair pay, safety and local knowledge are the four topics this report covers in most depth. Seasonal work and responsible use of AI follow close behind.

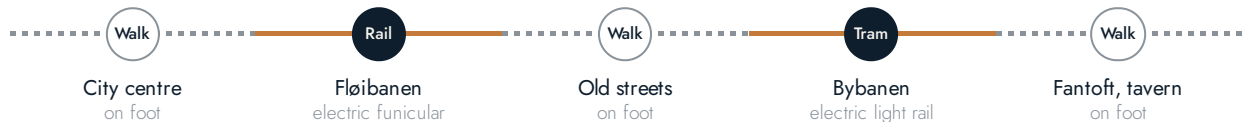


05 · ENVIRONMENT

Every leg, checked

We built every tour route around walking, trains, light rail and electric boats. Below is each leg, what it runs on, and how sure we are.

Stave Church tour



Flåm day trip



LEG	OPERATOR	ENERGY	STATUS
Fløibanen funicular	Fløibanen AS	● Electric	Confirmed by operator
Bybanen light rail	Tide for Skyss	● Electric	Confirmed
Replacement bus when Bybanen is closed	Skyss	● Public bus	Back-up only; see page 8
Bergen, Voss and Myrdal trains	Vy	● Electric	Confirmed
Flåm Railway	Flåm AS	● Electric	Confirmed
Nærøfjord boat	The Fjords	● Battery-electric	Vessels Future and Legacy of the Fjords
Gudvangen to Voss coach	Vy, for Norway's Best	● Not confirmed	Counted as diesel in our figures until confirmed
Haakon's Hall tour	None	● On foot	No motorised transport

A choice we made

There is another way to see the fjords from Bergen: a day on the Sognefjord, Norway's longest and deepest fjord. The boat that makes that trip is a diesel express boat, and the new contract from December 2026 keeps it that way. A diesel express boat emits many times more per guest than the electric boats and trains we use (see page 8). That is why we have chosen not to offer this tour, even though the fjord itself is spectacular.



05 · ENVIRONMENT

What our choices mean in numbers

Norwegian electricity is almost all renewable. In 2025 it came with 9.4 grams of CO₂-equivalent per kilowatt-hour.

Emissions per guest-kilometre, by transport mode

ESTIMATE

Grams of CO₂-equivalent per passenger-kilometre.

■ Modes we use

■ Typical alternatives we avoid

Bybanen light rail

Stave Church tour



≈ 1.5

Battery-electric fjord boat

Nærøyfjord



≈ 2

Electric train

Bergen Line, Flåm Railway



≈ 4

Diesel coach day tour

half the seats filled



≈ 40

Private diesel minivan

4 guests



≈ 70

Diesel express boat

measured load, Norway



≈ 106

Reference categories, not named companies. Sources: UK DESNZ conversion factors 2025, NVE 2025, operator data. See Appendix A.

Our own travel and office

The company has no office. Management work is done from home, and one of the owners now lives in Stockholm. In the reporting period she flew to Bergen once for work. All other coordination is done remotely.

Buses on the Stave Church tour

On the Stave Church tour, we normally use the Bybanen light rail, and a bus is only a back-up. When Bybanen was closed between Slettebakken and Byparken from 29 June to 26 July 2026, we used Skyss replacement buses. Skyss put more than 100 electric buses into service in Bergen in 2020, and 140 more electric buses joined the fleet across Vestland in 2025. We did not record which vehicles we rode, so these trips are not included in our figures for electric transport.

Waste, nature and crowding

Our tours produce very little waste: tickets are mobile, and the included drink is served at the venue. Groups of eight or fewer keep noise and wear low on trails and in narrow streets, and we can avoid the busiest times at popular sights.

We have not measured waste. Given our size, we judge it as a minor topic.



06 · PEOPLE

Fair pay, even on quiet days

Our guides are employed on temporary, seasonal contracts. We are not yet large enough to offer permanent positions, and as a very small company we may also need to work with freelance guides in the future, particularly in the low season, when bookings are too few to support more employment.

Guides are paid a fixed base for every tour they take on, plus a supplement for each guest. If a tour they are assigned to is cancelled, they still receive the base pay.

On a tour with one or two guests, the guide earns more from that tour than the company does. We accept that: the person doing the work should not pay for a quiet day.

We do not have a collective agreement, and there is no specific tariff for tour guides in Norway. The closest is the travel-industry agreement between Virke and HK. Our lowest possible hourly pay, on a tour with a single guest, is above the highest pay step in that agreement for 2026.

“Nobody should earn less because the booking calendar was thin that week.”

Our pay principle

3

guides employed in the
2026 season

2 : 1

women to men among
guides

1 : 1

women to men among
owners

0

injuries to guests or guides

Safety on every tour

After every tour, the guide fills in a short report. It asks whether anything unexpected happened, whether anyone was hurt or became ill, and whether tickets, equipment or information were missing. Every report in 2026 answered no to injuries.

Both owners have worked on ships and have completed the safety training that such work requires.

Training and support

Our guides bring a great deal with them from the start: deep knowledge of Bergen and strong storytelling. Before leading a tour on their own, every guide completed a paid training tour on the route, to learn our stories, standards and routines. With a company card and our accounting app, guides never pay tour costs out of their own pocket.

Pay rules were updated in September 2026, partly based on input from the guides, and the new rates were sent to every guide in writing.



07 · COMMUNITY AND CULTURE

Local stories, local partners

Our guides know Bergen well, and the company's founders grew up in the city, with family roots going back generations. Local knowledge, shared in person, is what guests come for.

Where guest money goes

A large part of every ticket price is passed on to local attractions and operators: the funicular, the light rail, the stave church, the museums, the trains and the fjord boat. Tours end at small, local businesses, a historic wine cellar and a neighbourhood pub, where the included drink is served.

- Fløibanen funicular and Mount Fløyen
- Fantoft Stave Church
- Haakon's Hall and Bryggens Museum
- Frille og Dyvekes vinkjeller, historic wine cellar
- Dr. Wiesener, neighbourhood pub
- Skyss, Vy, Flåm Railway and The Fjords

Heritage and crowding

Our routes pass a UNESCO World Heritage site at Bryggen and the Nærøyfjord, which is also on the World Heritage list. Keeping groups small means we add very little to the crowding these places already face.

Accessibility

We want everyone to be able to join us. Wheelchair users are welcome on our city tours, as long as they travel with someone who can push the wheelchair, since parts of the routes are cobbled or steep. Guests who need extra help can contact us before booking, and we will see what we can arrange. The Flåm day trip has tight connections between train, boat and coach and is not suitable for wheelchair users. We are working on clearer accessibility information on every booking platform for the 2027 season.

Honest gap: we have not yet measured how much of our spending goes to local, independent businesses. We will report this share from 2027.



08 · ECONOMY AND GOVERNANCE

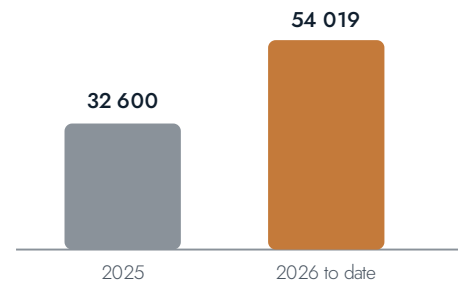
A small business that pays its way fairly

2026 revenue so far is 66 per cent higher than for the whole of 2025. The company still runs at a small loss, mainly because platforms take up to 30 per cent in commission and many tours run with one or two guests.

We have chosen to carry that loss ourselves rather than lower guide pay. The owners drew no salary from the company before September 2026, so the wages paid in 2026 went to our guides.

We build our own website so that more guests can book directly. That is the most important step we can take for both the company and our guides.

Revenue, NOK



Operating revenue from the accounts, unaudited.

Ethics

No convictions or fines for corruption, bribery or other business misconduct.

Guest data

Card payments are handled by the payment provider. We never see or store card numbers. Booking data stays in the booking systems and is not shared beyond what a tour needs.

Taxes and records

Accounts are kept in a Norwegian accounting system. Guides are on regular payroll with tax deducted, and expenses are documented with receipts.



09 · AI AND DIGITAL RESPONSIBILITY

We use AI, and we say so

AI tools help us run a small company without a back office. We think guests and guides have a right to know how we use them.

What we use AI for

- Handling bookings and customer messages
- Writing and checking texts for our website, listings and social media
- Research, for example the transport checks in this report
- Administration such as payroll and accounting routines

Who uses it

Two people in the company use AI tools: the managing director and one other person. Guides do not use AI in their work with guests. Every text we write to a guest or a guide is read and approved by a person first. Automated messages, such as booking confirmations and shift reminders, are templates we have written and checked ourselves.

Our rules in practice

- Card and payment details are never entered into AI tools.
- Identity documents and other sensitive personal data never reach AI tools.
- At most, an AI assistant may see a guest's name and phone number while helping us read a booking list.
- Facts about tours are checked against our own sources before they are published.
- We never use AI to write or fake reviews.

Energy use

AI tools run in data centres that use electricity and water. We cannot measure our share, and we have not included it in our emission figures. We include it here so the gap is visible.



10 · WHERE WE FALL SHORT

What we have not solved yet

A report that only shows good news is not worth much. These are the gaps we know about, and what we will do about them.

GAP	WHY IT MATTERS	TARGET
No written emergency plan	Our safety routines are known and followed, but they are not yet collected in one written plan for guides.	Written plan and a practice run with all guides before the 2027 season
Seasonal work	Guides work per tour in the season. We want to offer year-round work.	At least one winter tour from 2027
No written AI policy	We follow clear rules, but they are not yet published.	Published AI policy by spring 2027
Commission pressure	Platform commission of up to 30% limits what we can pay.	Report share of direct bookings from 2027
One leg not confirmed	The energy source of the Gudvangen to Voss coach, operated by Vy for Norway's Best, is not yet confirmed.	Written confirmation from the operator before the 2027 season
Local spend not measured	Much of our spending goes to local attractions and operators, but we have not measured the share.	Report local share of spending from 2027
Business travel	One work flight in 2026, with an owner based in Stockholm.	Remote work as the default, with about one work trip a year; report every trip
Accessibility	Accessibility information has not been clear or consistent across our booking platforms.	Clear information on how to join with a wheelchair or other needs, on every platform, for the 2027 season



APPENDIX A · METHOD

How we calculated

Boundaries

The figures cover guest transport during our tours, the owners' business travel and the company's own operations. Guests' travel to and from Bergen is not included, because we do not arrange it.

Emission factors

MODE	G CO ₂ E PER PKM	SOURCE
Norwegian electricity	9.4 per kWh	NVE 2025
Electric train	4	Klimatsmart Semester method v5.1 (Nordic)
Light rail	1.5	Own calculation, Bybanen energy data
Electric bus	1.5	Own calculation
Electric fjord boat	2	Own calc.: about 800 kWh per crossing (Danfoss case study), 150 to 200 guests
Diesel coach	40	DESNZ 2025 coach factor plus fuel supply, half full
Diesel minivan, 4 guests	70	DESNZ 2025
Diesel express boat	106	Fjorddronningen, 2019 actual load (Teknisk Ukeblad)

Flåm day calculation

LEG	KM	KG CO ₂ E
Train Bergen to Myrdal	166	0.66
Flåm Railway	20	0.08
Electric boat	28	0.06
Coach to Voss, counted as diesel	47	1.88
Train Voss to Bergen	108	0.43
Total per guest	369	≈ 3.1
Diesel coach, same day	≈ 350	≈ 14

Uncertainty

Figures for electric transport depend on how full the vehicle is and on the electricity mix, so they are rounded. Diesel figures depend strongly on how many seats are filled; we used half full as a typical case. None of the figures include producing vehicles or infrastructure. Data has not been checked by an outside auditor. The Gudvangen to Voss coach is counted as a diesel coach until the operator confirms its energy source; if it is electric, the Flåm day falls to about 1.3 kg per guest. The factors come from different sources and do not all use the same boundaries: some cover only fuel and electricity in use, others include fuel supply. The comparison therefore shows orders of magnitude, not exact differences.



APPENDICES B AND C

VSME index and claims register

B · VSME Basic module

ITEM	TOPIC	PAGE
B1	Basis for preparation	2, 4
B2	Practices and future initiatives	3, 13
B3	Energy and greenhouse gases	7, 8, 14
B4	Pollution	Not material
B5	Biodiversity	8, 10
B6	Water	Not material
B7	Resources and waste	8
B8	Workforce	4, 9
B9	Health and safety	9
B10	Pay and training	9
B11	Corruption and bribery	11

C · Claims register

Every environmental statement we use in marketing, and where the evidence is.

CLAIM	EVIDENCE
All motorised transport on the Stave Church tour is electric in normal operation (back-up buses not included)	p. 7
We use no private cars, minivans or diesel boats to move guests	p. 7
The Nærøysfjord crossing is on a battery-electric boat	p. 7
A Flåm day with us has less than a quarter of the emissions of the same day by diesel coach	p. 5, 14
Groups of at most eight, with one guide throughout	p. 9

We do not describe our tours as “eco-friendly”, “green” or “sustainable” on their own. When we use such words, the specific reason is given in the same place.

MOUNTAINS AND FJORDS GUIDING AS

Thank you for reading. Tell us where we
can do better.

booking@mountainsandfjords.com

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Org. no. 934 160 215 · Bergen, Norway