

Wednesday 19th June, 2024

Dear Secretary General,

1 July 2024 is a momentous day for the protection of the Arctic, as from this date heavy fuel oil (HFO) - the dirtiest of shipping fuels - will no longer be allowed to be carried as fuel or used on board ships operating in Arctic waters.

This measure will reduce the risk of HFO spills in Arctic waters and also have the co-benefit of reducing emissions of black carbon which contribute to climate heating. As you know, the ban was adopted three years ago by the International Maritime Organization through Resolution MEPC.329(76) which introduces into Annex I of the MARPOL Convention a new regulation prohibiting the use and carriage of HFO as fuels. There has been plenty of time for all IMO Member States to transpose the regulation into domestic law which will ban the practice of carrying and using heavy fuels in the Arctic by ships flying their own flags. It has also allowed plenty of time for Arctic shipping to prepare for new practices and purchase cleaner fuels to be used after this date. Norway has already implemented a ban on the use and carriage of HFOs in the waters around the island archipelago of Svalbard and [recently fined a Master and shipping company for having heavy fuel aboard the vessel while in Svalbard waters](#).

Unfortunately, there are significant loopholes in the regulation which will allow Arctic coastal nations to grant waivers and for shipping companies to make use of exemptions which allow ships with protected fuel tanks to continue carrying and using HFO until 1 July 2029. This is why the Clean Arctic Alliance is planning to write to IMO Member States ahead of 1 July 2024 urging them to implement the Arctic HFO ban and enforce it with immediate effect - without resorting to loopholes. We also propose that the shipping industry be encouraged to demonstrate their commitment to a cleaner future from 1st July, and not hide behind the use of exemptions. Shipping companies can move to readily available, relatively cleaner fuels such as marine distillate fuels or alternative forms of propulsion.

Our ask will be that IMO Member States:

- implement and strictly enforce the Arctic HFO ban with immediate effect from 1 July 2024,
- ensure full compliance with the new requirement by all ships operating in Arctic waters through comprehensive flag state and port state controls including checks on the fuels being carried by ships operating in Arctic waters,
- support an extension to the area of application to cover all waters above 60° North, and
- urge shipping fleets to follow the spirit of the regulation and not hide behind the use of exemptions.

In doing so, we believe that the risk of HFO spills in the remote and pristine Arctic environment can be eliminated and the co-benefit of reducing air pollution can contribute to slowing down the impacts of climate warming in the Arctic.

Please find attached a new infographic “Are you HFO ready” and we hope that you and members of the IMO Secretariat will join a webinar we are organising on 25th June at 16.00 BST (details attached to the e-mail).

We thank you for your support in protecting the Arctic,

Yours sincerely



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