

20th January 2025

Dear Ms Hvistendahl,

On behalf of the Clean Arctic Alliance, I am writing to set out our Vision for action during the Kingdom of Denmark's Chairship of the Arctic Council. The Clean Arctic Alliance urges prioritizing action to mitigate the Arctic climate crisis and to safeguard of the Arctic cyrosphere and ocean environment alongside sustainable development in the region.

To help accomplish this, and by adopting a special focus on new measures to mitigate the impacts of Arctic shipping, the Clean Arctic Alliance calls upon the Chair to:

- Minimize emissions of greenhouse gases and short-lived climate pollutants from shipping, including black carbon and methane.
- Reduce pollution discharges into the ocean and the risk of oil spills.
- Turn down the sound: quieten the Arctic ocean by addressing underwater radiated noise.

As you will be aware, the Arctic has already [warmed by 2.5°C](#). International shipping is one of several sectors contributing to that heating, through emissions of both greenhouse gases and short-lived climate forcers such as black carbon (BC) and methane. Coupled with these emissions, growth in international shipping in the Arctic, both in terms of numbers of ships and increasing distance being sailed, is leading to increased marine pollution and greater levels of disturbance. The Kingdom of Denmark's actions during its leadership (2025–2027) will be critical to the future health of the Arctic Ocean, the people that depend on it, and the global climate systems. These priorities provide an opportunity for the Chair to demonstrate global leadership by addressing challenges in a region experiencing extreme year-round temperature changes, record low summer sea ice, and earlier opening of Arctic sea routes.

The time to act is now, and the Clean Arctic Alliance recommends the Chair to take action to protect the ARCTIC ENVIRONMENT by:

- Promoting the development of a zero-emission vision for Arctic shipping and supporting a roadmap to transition from oil-based fuels to cleaner, non-fossil alternatives, along with the necessary onshore infrastructure.
- Encouraging Arctic nations to adopt the IMO's resolution [MEPC.342\(77\)](#), which advocates for using distillate or cleaner fuels in or near the Arctic, and endorsing the 'polar fuel' concept at the IMO leading to regulation.
- Implementing the Arctic heavy fuel oil (HFO) ban by immediately eliminating waivers and other loopholes that allow its use until the year of 2029, and steering clear of investing in or supporting the use of LNG as a marine fuel because of its lack of life cycle GHG reductions and supply chain methane leaks.
- Calling for the prohibition of the use of Exhaust Gas Cleaning Systems (scrubbers) and the discharge of scrubber waste in the Arctic.
- Encouraging the IMO to develop Arctic-specific recommendations and mandatory measures to significantly reduce underwater radiated noise by 2030.
- Strengthening regulations on marine plastic litter, sewage discharges and developing Arctic-wide regulations on greywater discharge.

- Promoting further reductions in shipping's impacts on priority Arctic ecosystems and species by establishing green shipping corridors with both biodiversity and climate goals which include vessel routing, speed reductions, and designation of shipping-free zones.

Promote CLIMATE AND GREEN ENERGY SOLUTIONS by:

- Advocating for mandatory IMO measures to reduce and eliminate black carbon emissions from Arctic shipping through amendments to MARPOL Annex VI, and supporting the uptake of diesel particulate filters (DPFs) which offers a ship based technical solution to reducing black carbon.
- Convening Arctic states, within the context of the IMO, to designate all regions of the Arctic an emission control area (ECA).
- Encouraging Arctic states to reduce black carbon emissions in line with 1.5°C warming pathways, the latest science, and Indigenous Knowledge. For shipping, this requires reductions in the range of 75% by 2030 and 95% by 2035 from 2013 levels, across the whole of the Arctic.
- Supporting short-term measures to reduce greenhouse gas emissions from Arctic shipping, including speed reductions, installation of wind-assist technology, and increased energy efficiency measures.

Support PEOPLE IN THE ARCTIC by:

- Supporting the rights of Indigenous communities to protect their livelihoods and resources by reducing black carbon emissions to slow snow and ice melt and implementing a strong HFO ban to protect vital subsistence resources like fishing and hunting, essential for Arctic Indigenous peoples' food security and cultural identity.
- Promoting a just and equitable transition that directly benefits Arctic Indigenous communities through cleaner alternative non-fossil fuels and increased use of renewable energy (e.g., solar, wind, and battery storage), alongside the HFO ban.

Develop a STRONGER ARCTIC COUNCIL by:

- Recognizing and addressing the lack of trained emergency responders and equipment for search, rescue, and oil spill response in the Arctic.
- Strengthening cooperation among Arctic nations to collaboratively respond to shipping accidents, including oil and chemical spills.

This cohesive and actionable plan emphasizes the Chair's critical role in shaping the Arctic's future during the Kingdom of Denmark's time leading the Arctic Council. We look forward to working with the Chair and all the members of the Arctic Council to address the urgent need to reverse the impacts of the climate crisis in the Arctic and sustainable opportunities for its people.

Yours sincerely,



Sian Prior

Lead Advisor, Clean Arctic Alliance

cc. Kristian Rasmussen and Margretha Jacobsen