To:
CEO of the Port of Rotterdam, Mr. Boudewijn Siemons
Chairman of the Management Board, Port of Hamburg Authority AöR, Mr Jens Meier
Port of Gdansk Authority SA, President of the Board, Ms. Dorota Pyć
Mayor of Rotterdam, Ms. Carola Schouten
Mayor of Hamburg, Mr. Peter Tschentscher
Mayor of Gdansk, Ms. Aleksandra Dulkiewicz
Caretaker Prime Minister of the Netherlands, Mr. Dick Schoof
Chancellor of Germany, Mr. Friedrich Merz
Prime minister of Poland, Mr. Donald Tusk
Commissioner, Directorate-General for Mobility and Transport of the European Commission, Mr. Apostolos Tzitzikostas
MEPs from ENVI commission:
Mr. Peter LIESE
Mr. Tiemo WÖLKEN
Ms. Silvia SARDONE
Mr. Alexandr VONDRA
Mr. Pascal CANFIN
Ms. Sara MATTHIEU
Mr. Jonas SJÖSTEDT
Ms. Anja ARNDT

Vilnius, 02/09/2025

OPEN LETTER

Do not help Russia to develop the Northern Sea Route

We write to bring your attention to an upcoming transarctic voyage by a Chinese ship along the Northern Sea Route to Europe, and we are worried about the precedent this sets for increased use of the route for transit, the environmental risks associated with this practice, and the potential benefits for the Russian regime.

Shipping on the Northern Sea Route is not sustainable, and ships involved in it might be a security threat to Europe.

According to multiple media sources this year, for the first time since the beginning of Russia's full-scale invasion of Ukraine, a Chinese company is planning a transit voyage via the Northern Sea Route (NSR) from China to Europe, specifically the ports of Rotterdam, Hamburg, and Gdansk.

The opening of such a regular transshipment route was announced by the Singapore's Sea Legend Shipping, which is controlled by Chinese investors. The first voyage is planned to start on the 20th of September 2025, for which, according to the company, all cargo spaces are already sold out. For this purpose, the *Istanbul Bridge* vessel (a

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Panamax class container ship with IMO 9200811, built in 2000), has already received permission from the Russian infrastructural operator of the NSR – the state nuclear corporation Rosatom – to pass through the NSR.

This vessel previously traversed the NSR in 2024 in a voyage from St Petersburg to China. But at that time, it sailed under a different name, the *Flying Fish 1*, flew a different national flag.

This sets a precedent for increased use of the route for transit, in accordance with the strategic plans of Russian authorities.

Bellona strongly discourages the use of the Northern Sea Route and cooperation with entities that wish to do so for two reasons:

1) **The route is harmful to the climate, creates an unacceptable risk of pollution to the Arctic environment, and unsafe for ships and crews.**

The Arctic is where global warming is most intense, and Arctic ecosystems are under enormous strain. Bellona has monitored for decades the Arctic industry, especially oil & gas, and shipping through the Northern Sea Route. Our experiences can be summarized as follows:

- Using the Northern Sea Route harms the global climate. Soot emissions from shipping in Arctic waters accelerate ice melt and add to the global impact of CO2 emissions.
- On July 1st, 2024, the IMO introduced a ban on the use of heavy fuel oil in the Arctic. Russian authorities refused to join the ban and have not changed their practices to comply with these requirements.
- An oil spill resulting from a wreck, collision, or grounding would cause an environmental catastrophe. There are no methods or equipment that could clean up the oil in an acceptable manner.
- The Northern Sea Route is not a safe route for the commercial fleet because of increasingly unpredictable ice conditions due to floating ice, more extreme weather, changes in currents and wave patterns, and poorly updated nautical charts.
- The scant infrastructure for search, rescue, and preparedness does not match the vast distances these areas represent.

Thus, according to international regulations by the IMO, sailing in the Arctic waters requires additional equipment on vessels and training for the crew. We suspect that the

Istanbul Bridge vessel might not be in full compliance with the Polar Code, where such requirements are listed. Such was the case in 2024 when Chinese vessels without either ice class or polar code compliance violated the Arctic safety while sailing through the NSR during deteriorating ice conditions.

2) **All activity along the Northern Sea Route gives Russian authorities more opportunities to finance their war efforts and may pose a security risk to Europe.**

Increased traffic on the Northern Sea Route would make a positive contribution to the Russian economy, making it easier for Russia to finance the war in Ukraine and increase its malign influence in other countries. Russian authorities have a goal of increasing the amount of goods transported yearly along the NSR from 38 mln t today to 150 mln t by 2030. The NSR is controlled solely by Russia, and only Russian icebreakers can escort vessels along the route, generating income to Russia's war chest. A boost in trade and transport would also strengthen the strategic and security importance of Russia's Arctic areas, which could lead to increased military activity in the region.

Russia could also use Chinese vessels for its hybrid war against Europe. In 2023, a Chinese vessel, the NewNew Polar Bear sailed between China and St. Petersburg via the NSR. The vessel was suspected of severing a gas pipeline and a telecommunications cable connecting Finland and Estonia by dragging its anchor. While China claimed the incident was accidental due to a storm, sabotage should not be ruled out so long as Russia continues its aggression against Ukraine.

More on the Russia's industrial and political expansion in the Arctic, it's environmental costs and risks of the shipping along the Northern Sea Route is in Bellona's recent report "The Northern Sea Route".

Bellona urges the Dutch, German, and Polish leaders to clearly convey to China's and Singaporean leadership that transport on the Northern Sea Route is neither desirable nor sustainable. Instead, China and Singapore, which both have held observer status in the Arctic Council, should be encouraged to contribute to protecting the Arctic marine environment – an obligation of all countries involved in Arctic activities.

We also urge the mayors and head of ports of Rotterdam, Hamburg and Gdansk to raise the issue with the national marine authorities and perform due diligence checks of the vessel prior to entering the ports. Should the ship reach the above-mentioned ports, we urge the relevant port authorities to conduct an inspection of the ship according to the Paris Memorandum of Understanding to check the compliance to the Polar Code.

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