

Response by Bellona to the open consultation and call for evidence on an updated EU Arctic policy

CONSULTATION RESPONSE

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The EU has both a responsibility and opportunity to upscale its Arctic engagement for the sake of **climate action**, regional stability and security, and a transition away from fossil fuels. In a changing geopolitical context with unclear perspectives, the EU has already shown that they have the power to set important standards and to influence Arctic policy.

1. Seize the moment to strengthen EU leadership in the Arctic

First and foremost, Bellona encourages the EU to use all tools - diplomatic, regulatory, and economic - to act as a **proactive standard-setter in the Arctic, especially in the constrained geopolitical environment**. Continued engagement with Arctic and non-Arctic partners, scientific institutions, and indigenous organisations is essential.

An updated EU Arctic Policy should clearly state that:

- While the security environment has changed dramatically since the last EU Arctic strategy, this must be met with a renewed commitment to climate protection, peace, and integrity.
- The EU will not contribute to an Arctic resource race for fossil fuels, other risky extraction activities like seabed mining, or unchecked shipping expansion.

2. Climate mitigation, adaptation and environmental protection must remain the core of EU Arctic policy

Climate change is an overriding challenge in the Arctic and should remain a primary lens through which EU Arctic engagement is assessed. The Arctic may become ice-free (less than 1 million km² sea ice) in the 2030s, but it does not automatically mean that the Arctic ocean will become more navigable. Climate change will also raise the frequency of severe weather conditions.

An updated policy should:

- Work toward an ambition to make the Arctic **the EU's first climate neutral region**.
- Ensure **meaningful participation of Indigenous Peoples and local communities** to support economic diversification and just transition strategies in Arctic regions.
- Regulate human activity to maximize and prioritise use of the best available technologies in the Arctic region.

3. Reaffirm that oil and gas development in the Arctic is incompatible with EU climate objectives – Reaffirm the Arctic oil and gas moratorium

Sustainable and inclusive development in the Arctic cannot be achieved through continued fossil fuel expansion. This includes indirect support through finance, infrastructure (e.g. pipelines), or political endorsement. A removal of the current oil and gas moratorium would signal EU support for fossil extraction in the Arctic – in opposition to the EU's long-term position. Countless studies show that we have already **discovered** more oil and gas than we can sustainably use and that the financial and environmental **risks** are extreme.

Bellona recommends that the updated policy:

- Reaffirms that the EU will not support Arctic oil and gas activities
- Ensures that **EU-supported Arctic investments** exclude all fossil fuel related activity and do not contribute to promotion or lock-in of such harmful activities.
- Calls for **decommissioning plans of oil and gas fields in the Arctic as a region of priority**.
- Work toward establishing **non-extraction zones** and expanded **marine protected areas** in Arctic waters.

4. Shipping, security and the Northern Sea Route: precaution over promotion

The retreat of sea ice increases interest in Arctic shipping, notably along the Russian coast via the Northern Sea Route (NSR). Bellona's **analysis** shows that the NSR does not represent a sustainable or reliable alternative to existing global shipping routes. Traffic remains highly risky, in multiple respects: increasing risks of spills, black carbon emissions, and accidents in vulnerable areas with limited emergency response capacity, while supporting Russian fossil fuel activities and war efforts.

The EU should:

- **Actively oppose the NSR** shipping corridor as a trade route and support international efforts to restrict this shipping lane.
- Recognise the security and **sanctions context linked to NSR** development and ensure EU Arctic policy is fully consistent with its foreign and security policy objectives.
- Enhance its work through the **IMO and bilateral partnerships** to accelerate and strengthen regulations on Arctic shipping, including zero-emission vessels, black carbon controls, expanding emission control areas and mandatory spill preparedness.

EU leadership in the Arctic is more essential than ever to safeguarding a stable, low-impact region in a rapidly warming world. Bellona is ready to support the Commission with further expertise and dialogue as the policy update progresses.

5. Nuclear safety and security in the Arctic

In times of unprecedented raise of nuclear security risks, given the failure of the Comprehensive Nuclear-Test-Ban Treaty and the history of using the Arctic as a test site for nuclear arms, it is necessary and important to protect the region from another round of nuclear threats. The EU should initiate a Nuclear-Test-Ban Treaty for the Arctic to start the global nuclear de-escalation from the most environmentally fragile region.

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