May 9th, 2016

Via Email

Ambassador Mark Brzezinski
Executive Director
Arctic Executive Steering Committee
Mark_F_Brzezinski@ostp.eop.gov

RE: The U.S.-Nordic Leaders Summit and Heavy Fuel Oil Use in Arctic Shipping

Dear Ambassador Brzezinski,

The undersigned organizations write to you, Executive Director of the U.S. Government’s Arctic Executive Steering Committee, today to urge the United States and the five Nordic countries of Denmark, Finland, Iceland, Norway, and Sweden to jointly commit to a prohibition on the use of heavy fuel oil (HFO) by ships in the Arctic. HFO use poses a major risk to the shared Arctic marine environment, and its emissions negatively impact the global climate—which as all five Nordic ambassadors recently noted are “global themes where Nordic and American views, policies and actions often coincide”.1 The U.S.-Nordic Leaders Summit is an ideal opportunity for these historically close nations to demonstrate clear regional leadership and work together to ban the use of HFO in the Arctic through the International Maritime Organization (IMO).

The leaders attending the Summit represent nations that have already reviewed the serious threat an HFO spill poses to the Arctic.2 A report by the Arctic Council’s Protection of the Arctic Marine Environment (PAME) Working Group concluded “[i]n light of particular HFO properties, significant risk reduction will be achieved if the onboard oil type is of distillate type rather than HFO”.3

As a result of its “particular properties” HFO spills are up to 50 times more toxic to fish than medium and light crude oil spills.4 HFO is also especially viscous, and takes longer to break down in the marine environment. For instance, while studies have found that weathering can break down a marine diesel after three days, 90 percent of HFO remains after 20 days.5 Were the spill to occur in icy areas, HFO would likely stick and become trapped inside of the ice, persisting even longer.

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2 PAME (2016). Heavy Fuel Oil in the Arctic: Protection for the Arctic Marine Environment. Available at: http://www.pame.is/images/03_Projects/AMSA/Heavy_Fuel_in_the_Arctic/Phase_I_HFO_project_AMSA_rec_IB_Final_report.pdf.
5 DNV 2011.
Were a major HFO spill to occur in the Arctic marine environment it would have devastating consequences for the region’s wildlife like the beluga whale, as well as to the food security of many Arctic indigenous communities dependent on marine subsistence hunting. For animals that rely on feathers or fur for insulation, like polar bears, seals, or eiders, viscous substances like HFO can compromise this defense and cause fatal hypothermia. Inhalation of vapors, as well as direct or indirect ingestion of HFO could have both lethal impacts on individual animals, and ultimately reverberate through an entire area’s food chain. Studies following the 1989 Exxon Valdez oil spill found that impacts on the affected ecosystem persisted for more than a decade.

Depending on its geographic location, the logistics of responding to an HFO spill, as any spill, in the Arctic would be challenging. These leaders know better than anyone that the Arctic is characterized by periods of complete darkness, intense storms, and in many places, distant infrastructure. Even if a spill were to occur near response facilities, HFO poses a unique challenge to clean-up and recovery. For instance, HFO emulsifies, rather than evaporating, making in-situ burning more difficult.

As Arctic shipping is expected to grow, the possibility of an accident causing an HFO spill to occur is also likely to increase. There were 71 shipping casualties within the Arctic in 2015, as opposed to just three in 2005. From 2015-2025, shipping transits in the U.S. Arctic alone are projected to increase between 100 and 500%.

In addition to its impacts on the Arctic marine environment, HFO use emits significant quantities of particulate matter and black carbon, the latter of which is the second largest contributor to global climate change after carbon dioxide (CO\textsubscript{2}). Reducing the impacts of black carbon, a short-lived climate forcer that is especially potent at higher latitudes, would complement the aspirational goal of the historic Paris Agreement to limit global temperature increases to 1.5 degrees Celsius, which all six Summit countries signed last month on April 22. One estimate found that switching from HFO to distillate fuel would reduce potential black carbon emissions by 30 to 80 percent.

In the U.S.-Canada Joint Statement issued on March 10\textsuperscript{th}, 2016, both nations committed to “determine with Arctic partners how best to address the risks posed by heavy fuel oil use and black carbon emissions from Arctic shipping”. We believe that the Summit’s leaders can offer a specific path to address these issues by committing to phase out HFO use in the Summit outcome.

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7 Ibid.
10 DNV 2011.
statement. We would also like to commend Sweden and Norway for joining with Canada and France to formally support an NGO paper that raised many of the concerns in this letter on the floor of the 69th meeting of the Marine Environment Protection Committee (MEPC) of the IMO last month.\(^\text{18}\)

In conclusion, we call for the U.S.-Nordic Summit to firmly commit to prohibiting the use of HFO in the Arctic and for the United States to take a leadership role on this issue at the Summit. The risk to the Arctic environment—its people, marine environment, and climate—has both regional and global implications and is too great to permit the continued use of HFO by ships operating in Arctic waters. Leadership on this issue not only complements the work all six nations have done through the Arctic Council, but it also supports the endeavors of the entire global community to mitigate the impacts of climate change.

We appreciate your consideration of this letter.

Sincerely,

Conrad G. Schneider
Advocacy Director
Clean Air Task Force

Danielle Grabiel
Senior Policy Analyst
Environmental Investigation Agency

John Kaltenstein
Senior Policy Analyst
Friends of the Earth

Andrew Hartsig
Director, Arctic Program
Ocean Conservancy

Kevin Harun
Arctic Program Director
Pacific Environment

Alexander Shestakov Ph.D
Director
WWF Global Arctic Program

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\(^{18}\) Clean Shipping Coalition, Friends of the Earth, Pacific Environment, WWF. (2016). Heavy fuel oil use by vessels in Arctic waters. MEPC 69/20/1.