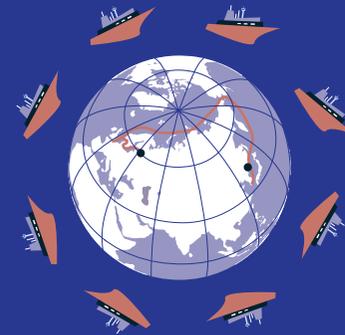


The IMO Draft Arctic Heavy Fuel Oil (HFO) Regulation: A Ban In Name Only?



Arctic sea ice is melting faster than most climate models predict. Scientists are now predicting summer sea ice could disappear as early as 2035.



Increased summer melting is opening up Arctic shipping routes to increased activity.



Between 2015 and 2019, HFO use in the Arctic grew 75%, while carriage of HFO grew 19%.

The regulation on HFO use and carriage risks being a ban in name only...

An Arctic HFO ban as currently drafted to take effect in 2024 is a "paper ban", devoid of meaningful protection for the Arctic until 2029!

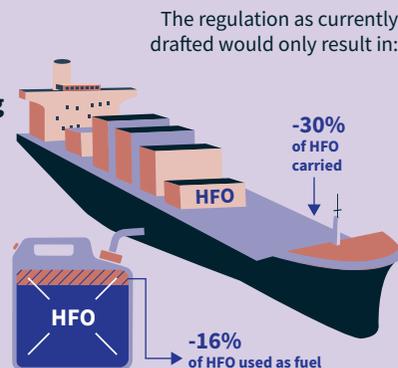
The draft Arctic HFO regulation includes an **exemption** for ships with protected fuel tanks until 2029, and the opportunity for Arctic coastal states to **waive** the HFO ban for their own flagged ships while operating in their own waters until 2029. **It will not protect the Arctic.**



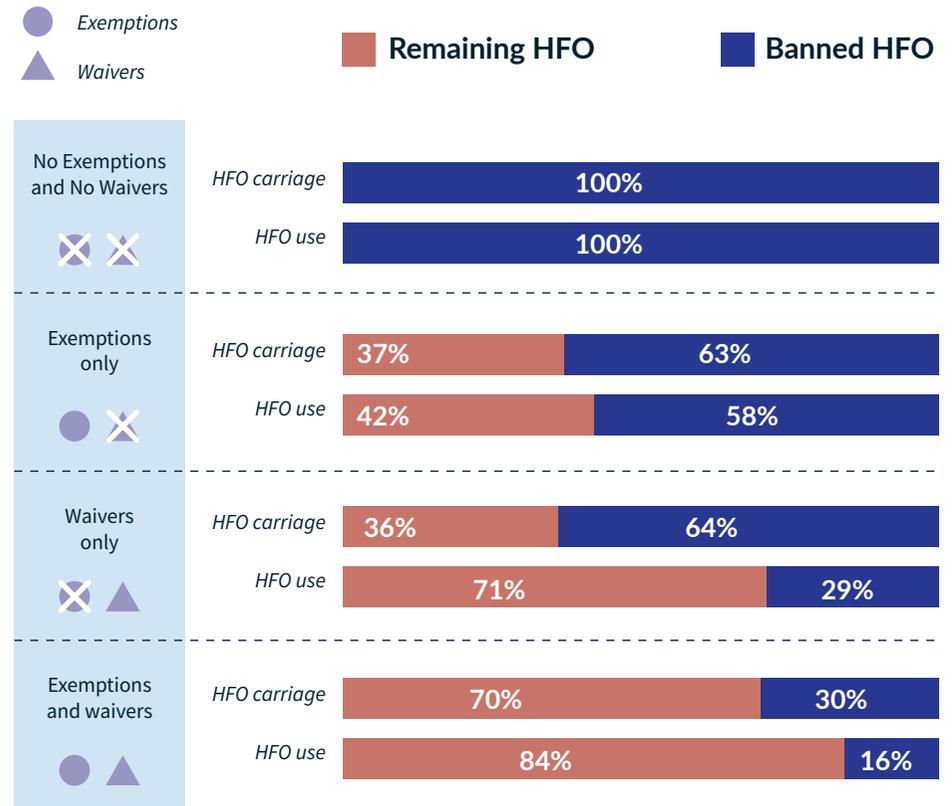
...and fails to protect the Arctic

A regulation with exemptions and waivers will result in **banning only 16% of HFO used and 30% of HFO carried in the Arctic:**

- allowing "business as usual" for most shipping operators in the region
- and as shipping continues to increase and newer ships with protected tanks replace older vessels, the amount of HFO used and carried for fuel in the Arctic will also increase.



How different combinations of exemptions and waivers affect HFO carriage and use:



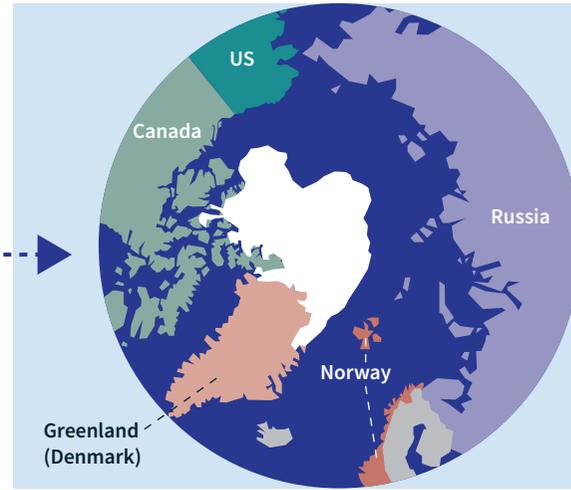
based on 2019 figures

Sources: Comer et al., 2020. <https://theicct.org/publications/analysis-HFO-ban-IMO-2020>
MEPC 75/10/7 Submitted by FOEI, Greenpeace International, WWF, Pacific Environment and CSC.
Legal Advice from Matrix Chambers & Leigh Day, and from E.J. Molenaar, Utrecht University, September 2020.



Spotlight on the waiver clause

The draft Arctic HFO regulation includes a provision which allows waivers to be issued by **Arctic coastal states** for ships bearing their flag while operating in their own waters.



The Arctic Five coastal states

The Arctic Ocean is a unique ecosystem which the five central coastal states have a stewardship role in protecting.

(Ilulissat Declaration, 2008)

How waivers could sink the HFO ban

The Clean Arctic Alliance is concerned that the waiver clause ...

- is not flag-neutral
- will have negative environmental consequences
- will result in lower environmental standards in Arctic territorial seas and exclusive economic zones (compared to high seas)
- will create to a two-tier system of environmental protection and enforcement
- fails to address transboundary risks
- could lead to an increase in the amount of HFO used and carried as fuel in the

Arctic if shipowners re-flag their ships to countries issuing waivers



Don't miss the boat – what needs to happen now...

The Clean Arctic Alliance does not support the draft IMO Arctic HFO regulation – it is not fit for purpose, and the flaws must be addressed.

The IMO and its members must:

- protect Arctic ecosystems - and the rights of Indigenous communities to a clean and sustainable environment must also be respected;
- mitigate any negative socio-economic impacts for northern communities by supporting the transition to alternative fuels;
- strengthen the Arctic HFO regulation by removing the possibility of exemptions and of waivers.

