

**Association of Journalists-Environmentalists
of the Russian Union of Journalists • Circumpolar Conservation Union •
Earthjustice • Oceana • Pacific Environment • World Wildlife Fund**

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Gustav Lind
Chair, Arctic Council Senior Arctic Officials
gustav.lind@gov.se

Sigrid Anna Johnson
Senior Arctic Official, Canada
mda@international.gc.ca

Klavs A. Holm
Senior Arctic Official, Denmark
klahol@um.dk

Hannu Halinen
Senior Arctic Official, Finland
hannu.halinen@formin.fi

Hjalmar W. Hannesson
Senior Arctic Official, Iceland
hwh@mfa.is

Karsten Klepšvik
Senior Arctic Official, Norway
kkl@mfa.no

Andreas von Uexkull
Senior Arctic Official, Sweden
andreas.von-uexkull@gov.se

Anton Vasiliev
Senior Arctic Official,
The Russian Federation
anton.vasiliev@mid.ru

Julie Gourley
Senior Arctic Official,
United States of America
GourleyJL@state.gov

Dear Senior Arctic Officials:

As the Arctic Council becomes an increasingly prominent forum for establishing Arctic-wide policies with global ramifications, the role of the Senior Arctic Officials takes on a higher profile in ensuring that the Council is addressing the most important and pressing issues facing the Arctic.

With that in mind, we, the undersigned non-governmental organizations, concerned about the extreme vulnerability of Arctic ecosystems to climate change and to the stresses associated with increased resource exploitation and shipping, respectfully suggest that the Council place a high priority on addressing the following set of issues in the Kiruna Declaration.

1. Achieving significant reductions in short lived climate forcers, fast.

The Arctic Council must very publicly put its full weight behind efforts to reduce emissions of the short lived climate forcers (SLCF) black carbon, methane, and ground-level ozone. Ambitious global action on carbon dioxide (CO₂) remains the backbone of efforts to limit the adverse consequences of climate change in the Arctic and globally. But the long atmospheric lifespan of CO₂ means that CO₂ emission reductions alone cannot avert further dramatic, potentially devastating changes to the Arctic in the near term. Rapid reductions in SLCF emissions have been identified as the only effective strategy to slow near-term warming and melting in the Arctic from now until 2040, giving the cultures and biodiversity of the region more time to adapt and slowing continental ice melting that contributes to rising sea levels. Arctic states have a special responsibility to reduce their emissions of black carbon, as it is a particularly potent climate forcer when emitted from within or near the Arctic, where particles have a greater chance of settling on Arctic ice and snow and amplifying warming and melting.

Arctic states should demonstrate global leadership in reducing SLCF emissions to protect the Arctic by committing to enhance efforts to reduce domestic emissions, guided by the Arctic Council's Task Force on SLCFs, and by agreeing to establish in the Kiruna Declaration a mechanism for reporting and consultations on progress on national mitigation actions.

Arctic states should also demonstrate their collective leadership as parties to the Convention on Long Range Transboundary Air Pollution (CLRTAP) by agreeing that each Arctic state shall submit a national black carbon emissions inventory, based on inventory guidelines to be agreed by CLRTAP, within an agreed time period.

We further urge that the Kiruna Declaration commit the Arctic states to establish a high level negotiating group to draft a circumpolar black carbon instrument that will set a regional target for black carbon emissions reductions, require the states to develop national black carbon mitigation plans, and include procedures for reporting and for consultations on implementation.

2. Adopting strong measures to prevent or reduce the likelihood of large oil spills and marine pollution.

Those states that are promoting offshore oil and gas development in the Arctic are consciously choosing to risk one of the world's most fragile and least understood ecosystems. Because so little is known about the Arctic, because oil and gas development will inevitably result in oil spills, and because there is very little that can be done to clean up a spill once it happens, particularly under harsh Arctic conditions, we believe that the Arctic countries should delay offshore oil development indefinitely while they begin to fill in the gaps in our knowledge and develop the legal and physical capacity to prevent oil spills and other pollution and to deal effectively with the accidents that will occur. Only then should they decide where to allow oil and gas development, if at all.

In the absence of such a prudent policy, what is needed most are more effective laws and practices aimed at preventing oil spills and other pollution and protecting the lives and health of workers and Arctic communities. Through the Arctic Council and their own domestic law-making processes, the Arctic countries should not only harmonize their laws and procedures relating to offshore oil and gas operations but *raise* those standards in ways that will reduce the frequency of spills and other pollution and the likelihood of catastrophic accidents. Responses to Freedom of Information Act requests to the U.S. government concerning Shell Oil's "oil spill containment dome," which collapsed in trials in calm, shallow non-Arctic waters, reveal just how unprepared even that company and the U.S. are to handle an offshore blowout. Indeed, as the experiences of Shell over the last few months in Alaska demonstrate, even basic transportation issues present challenges in Arctic and sub-Arctic waters for which oil companies are not prepared.

3. Filling the serious gaps in the recently negotiated Agreement on Cooperation on Marine Oil Pollution Preparedness and Response in the Arctic.

The Council's Task Force on Oil Spill Preparedness and Response, under the very able leadership of Ambassadors Balton, Klepssvik and Vasiliev, recently completed its work on this agreement, which applies to spills from both offshore oil and gas operations and to those from shipping and transport. The ambassadors and all who participated in the process are to be congratulated for their achievement. The agreement takes important first steps by requiring each country to maintain emergency response plans tied to the probability of accidents arising from particular activities at specific sites and to identify areas most important to protect for ecological reasons, and it should lessen delays in requesting and providing assistance.

Nevertheless, the agreement had to be negotiated under a very tight deadline and, as a consequence, there is much that still needs to be done. The agreement does not commit the parties, together or individually, to increase their level of preparedness through greater investment and placement of personnel and equipment. Nor does the agreement require or facilitate the use of equipment that is privately owned by oil companies operating in the Arctic or by associations or companies under contract to them. The parties have committed to exchange information on a wide range of issues that should lead to improved preparedness, response and environmental protection, but the agreement does not set out a clear or concrete process for how cooperation on these broader issues will proceed.

The agreement recognizes the Arctic Council as a forum with which the parties may cooperate to address implementation of the agreement. We encourage the Arctic Council member states to endorse a process through which ongoing work under the agreement can continue and gaps such as those identified above can be filled.

4. Working with Arctic peoples and communities to improve health and environmental protection.

The Permanent Participants represent the concerns of the Arctic's Indigenous Peoples in the work of the Arctic Council, and we defer to them in identifying the issues of greatest priority to those they represent. From an environmental perspective, however, we note that Arctic peoples and communities, along with people in low-lying coastal and island states, are facing the impacts of climate change sooner and more acutely than any other people, with little in the way of financial resources to help adapt to the new and changing Arctic climate, potential food scarcity and other challenges as well as to build truly sustainable jobs and economies that are not based on the depletion of finite resources. We also note that the black carbon emissions within the Arctic pose a health threat to many Arctic communities in addition to their role in promoting climate change and ice loss. We strongly encourage the Arctic Council and its member states to work with the Permanent Participants and others to address these issues and help provide the financial resources that local communities need to meet these substantive challenges; and to recommit the Council itself to the values of transparency and openness that will be needed if they and others are to continue to contribute to the Council's important work.

By accident of geography, states that are among the wealthiest and most developed on Earth "own" most of the Arctic. The Arctic states must, however, demonstrate to an increasingly concerned international community that they are also stewards of the Arctic, especially with respect to the global impacts of Arctic regional climate change, and that in the event of potential conflict their long-term, global stewardship responsibilities outweigh their commercial interests. Joint action through the Arctic

Council to address the concerns we have raised would be a clear and convincing demonstration of that stewardship.

Thank you for your kind attention. We look forward to a cooperative, constructive relationship with the Council, its member states and Permanent Participants and to supporting strong policies to protect the Arctic.

Sincerely,

Alexander Fyodorov
Association of Journalists-
Environmentalists of the Russian
Union of Journalists

Erika Rosenthal
Vawter Parker
Earthjustic

Whit Sheard
Oceana

Iva Kaufman
Circumpolar Conservation Union

Alex Levinson
Pacific Environment

Alexander Shestakov Levinson
World Wildlife Fund

cc: Arctic Athabaskan Council
Aleut International Association
Gwich'in Council International
Inuit Circumpolar Council
Russian Arctic Indigenous Peoples of the North
Saami Council
Indigenous Peoples Secretariat

cc: Magnus Johannesson
Director, Arctic Council Secretariat
magnus.johannesson@umh.stjr.is