



WWF Global Arctic Programme (GAP): Comments to Inform the Revision of the EU Arctic Strategy

WWF acknowledges several strengths of the EU's 2021 Arctic Policy, including its recognition of climate change as the defining challenge for the Arctic, its emphasis on environmental leadership, and its commitment to the rights and livelihoods of Indigenous peoples. These priorities remain highly relevant.

As the Arctic policy is updated, WWF encourages the EU to articulate a more concrete and strategic role in advancing biodiversity conservation and precautionary governance. This includes continued support for a moratorium on new Arctic oil and gas projects and deep seabed mining, leadership in reducing the impacts of shipping in the Arctic and setting global standards, and translating global biodiversity commitments into meaningful Arctic action, with priority given to the Central Arctic Ocean.

Oil and gas: continued support for a moratorium on new oil and gas projects in the Arctic

Expanding petroleum activity in the Barents Sea and the northern Norwegian Sea poses serious risks to one of the world's most vulnerable ecosystems, threatening marine wildlife and Indigenous communities, while offering no timely solution to Europe's energy security needs. New Arctic projects involve long lead times, and would only become operational well after Europe is expected to be significantly advanced toward climate neutrality. At the same time, new infrastructure, such as gas pipelines, could lock in fossil fuel exports for decades beyond 2050.

The EU should:

- Reiterate and reinforce a commitment to limiting global warming to 1.5°C to avoid the most extreme climate impacts on Arctic biodiversity and ecosystems.
- Maintain its commitment to pursuing a moratorium on new oil and gas projects in the Arctic.
- Establish a clear timeline for phasing out hydrocarbons sourced north of the Arctic Circle in Norway, particularly from the northern Norwegian Sea and the Barents Sea.
- Strengthen energy security by accelerating renewable energy development and reducing long-term dependence on imported fossil fuels.

Deep Seabed Mining: support for a global moratorium

The deep sea, including Arctic regions, hosts some of the world's most vulnerable and least understood ecosystems. Scientific evidence indicates that damage from deep seabed mining (DSM) would be



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irreversible, and that significant knowledge gaps make environmental risks impossible to manage effectively. The European Commission has stated in the [2025 EU Ocean Pact](#) that “[u]ntil sufficient scientific evidence is available to confirm that deep-sea mining poses no threat to marine ecosystems, the Commission calls for a precautionary pause and calls on the Council to confirm this approach.”

In 2024, the European Parliament expressed strong concern over Norway’s decision to open large Arctic areas to DSM, urging Norway to uphold international environmental commitments and calling on the EU to pursue a global moratorium. The EU Long Distance Advisory Council has expressed similar concerns. Norway has since halted its deep seabed mining plans until 2029.

The EU should:

- Reaffirm its precautionary stance by supporting a global moratorium on deep seabed mining until robust independent science and strong governance frameworks are in place, and unless and until it can be demonstrated that no harmful effects will occur.
- Clearly reflect a commitment to pursuing a global moratorium on deep seabed mining within the EU Arctic Strategy with the aim of protecting vulnerable biodiversity and deep-sea ecosystems.
- Strengthen mineral security by investing in circular economy solutions and reduced demand for primary mineral extraction.

Shipping: EU leadership to reduce impacts and set global standards

Shipping is an increasing source of environmental pressure in the Arctic with impacts that extend well beyond the region. Through its regulatory influence, market power, and leadership in global and regional fora, particularly the International Maritime Organization (IMO), FuelEU Maritime, and ETS rules, the EU is well positioned to play a decisive role in reducing the climate and biodiversity impacts of Arctic shipping.

Priority actions include:

- Maintaining a commitment to Zero Emission and Zero Pollution shipping in the Arctic Ocean.
- Accelerating the transition away from residual fuels, including heavy fuel oil and other high-polluting marine fuels.
- Reducing black carbon emissions that are particularly detrimental to Arctic ecosystems and people.
- Reducing greenhouse gas emissions from European shipping that is operating in Arctic waters.



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- Addressing non-climate impacts of shipping, particularly underwater radiated noise (URN) which poses growing risks to Arctic marine mammals. The EU can share with Arctic states and the Arctic Council its expertise and experience in addressing underwater noise in European waters through the Marine Strategy Framework Directive, promote the uptake of best practices and, where feasible, mandatory measures for vessels operating in sensitive Arctic waters.

Biodiversity conservation: translating global commitments into Arctic action

The EU has established itself as a leader in global biodiversity governance including under the Convention on Biological Diversity (CBD) and the Agreement on Biodiversity Beyond National Jurisdiction (BBNJ). The updated Arctic Policy provides an opportunity to more clearly define how this leadership can be translated into tangible, region-specific conservation outcomes across Arctic marine and terrestrial environments.

The EU should:

- Support the development of an Arctic-wide, ecologically coherent network of protected and conserved areas, including in marine areas across and beyond national boundaries, as a contribution to global biodiversity goals such as the EU's 30×30 commitment, and in partnership with Arctic States and relevant regional and global frameworks.
- Elevate the Arctic's ecological significance within global biodiversity and climate negotiations and implementation processes.
- Provide financial, technical, scientific, and convening support to the implementation of biodiversity commitments in Arctic-relevant processes, including under the BBNJ Agreement and through regional mechanisms such as OSPAR, to help translate global targets into effective conservation outcomes.
- Share EU experience in mainstreaming biodiversity and conservation into economic sectors, such as fisheries, shipping, and infrastructure development, in ways that are relevant to Arctic contexts.

Central Arctic Ocean: precautionary governance and institutional leadership

The Central Arctic Ocean (CAO) represents a rare opportunity to apply precautionary, ecosystem-based governance before large-scale industrial activity takes place. The EU can play a constructive role in supporting emerging governance arrangements and helping to ensure they deliver concrete conservation outcomes.



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WWF encourages the EU to articulate a clearer role for itself in CAO governance by:

- Continuing to support the Agreement to Prevent Unregulated High Seas Fisheries in the Central Arctic Ocean (CAOFA), including implementation of the Joint Program of Scientific Research and Monitoring (JPSRM) Framework, and the adoption of Conservation and Management Measures, particularly for exploratory fishing, that include the identification and protection of vulnerable marine ecosystems, inclusive of sea ice.
- Using its influence in relevant international fora, including CAOFA, IMO, OSPAR, and the BBNJ framework, to encourage coherent, science-based conservation measures for the CAO.
- Exploring how emerging BBNJ tools, including area-based management measures, could be applied in Arctic high seas contexts in a manner consistent with Arctic realities and Indigenous knowledge.

The EU can also play a convening and bridge-building role, helping to align fragmented institutional processes toward a shared vision for long-term conservation and stewardship of the CAO.

Cross-cutting priorities: implementation, coherence, and credibility

Effective implementation will ultimately determine the impact of the updated Arctic Policy. Coherence across EU institutions, member states, and external engagements will be essential if the EU's Arctic ambitions are to translate into meaningful outcomes. A successful EU Arctic Policy depends on the most ambitious formulation of new objectives, and the rigorous interpretation and implementation of existing ones.

WWF encourages the EU to:

- Align Arctic policy objectives with the EU Integrated Maritime Policy, The Marine Strategy Framework Directive, EU Green Deal, European Climate Law, and sustainable finance frameworks.
- Ensure that EU funding and investment in the Arctic, including actions undertaken in support of the green transition and the Critical Raw Materials Act, are conditional on high environmental and social standards, including respect for Indigenous rights and meaningful participation, including Free, Prior, and Informed Consent (FPIC).
- Communicate clearly to EU citizens the global importance of the Arctic, for climate stability, biodiversity, and food security, and the EU's responsibility as a major economic and political actor.



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- Meaningfully engage Arctic youth in the revision and implementation of the EU Arctic Strategy, recognizing their role as rights-holders, knowledge holders, and civil society leaders, and ensuring their perspectives inform policy priorities, implementation, and long-term stewardship of the Arctic through representative institutional Arctic youth advisory bodies.