

## SUBMISSION

# Submission to the EU Arctic Policy Consultation

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Since 2016, the European Union's (EU's) Arctic policy has included a commitment to ensuring that oil, coal, and gas stay in the ground, including in Arctic regions. **The International Institute for Sustainable Development recommends that the EU uphold its commitment to an Arctic fossil fuel extraction moratorium in the next iteration of its Arctic policy.** Furthermore, IISD recommends that the EU establish a clear timeline to phase out imports of fossil fuels originating from north of the Arctic Circle, including from the northern Norwegian and Barents seas.

## Energy Security and Affordability

The EU should maintain its commitment to an Arctic moratorium for energy security reasons. New fields in the Arctic would only become operational when the EU should already be well advanced on its net-zero pathway. The average time frame from the discovery of oil and gas resources to production on the Norwegian shelf is 13 years (Offshore Norge, 2023). This is likely to be even longer in the Barents Sea, due to severe weather conditions and limited infrastructure.

If the EU wishes to pursue true energy security, it should avoid fossil fuel lock-in whereby short-term European demand for fossil fuels incentivizes Norway—and potentially other Arctic jurisdictions—to invest in high-risk, high-cost long-term infrastructure in the Arctic. Instead, it should invest in renewables, storage, electrification, efficiency, and grid infrastructure.

In addition, due to their remote location and difficult weather conditions, Arctic fossil fuels are expensive to produce—about USD 75 per barrel, compared to around USD 48.5 for conventional oil from other regions (Gaulin, 2023). Therefore, they do not provide an affordable energy choice for Europe.



## Protecting Local Ecosystems

The Arctic is a vital yet fragile ecosystem. Oil and gas expansion would significantly increase the risk of oil spills, leakages, and harmful underwater noise from shipping and seismic surveys, threatening vulnerable wildlife populations and biodiversity. The 2021 Arctic policy noted “the specific difficulty, due to the prevailing weather conditions, for response and clean-up, in case of industrial or maritime accidents” (European Commission, 2021). If there were a major accident, it could devastate local ecosystems for decades.

## Reducing Security Risks

Maintaining the commitment to a moratorium will minimize security risks. Because the Barents Sea is shared between Norway and Russia, geopolitical changes have made it a vulnerable area. The more reliant the EU is on oil and gas imports from this region, the more exposed it is to security risks.

## Consistency With Partners

Key Arctic partners have recognized the need to protect the region from fossil fuel expansion. Canada and its Indigenous Nations introduced a moratorium on Arctic offshore oil and gas licensing in 2019 and extended it in 2023 following a review of the environmental evidence (Government of Canada, 2023). Greenland enacted a ban on oil and gas exploration in 2021 (Government of Greenland [Naalakkersuisut], 2021), citing climate and economic considerations. If the EU were to pull back from its own commitment, it would fall behind like-minded partners and dilute its credibility as a climate leader. At a time of geopolitical fragmentation in the Arctic (Spence & Conway, 2026), the EU has an opportunity to showcase leadership, reinforce cooperative governance, and anchor regional stability in science-based climate action.

Reaffirming the moratorium would demonstrate policy coherence with the European Green Deal, strengthen alliances with responsible Arctic actors, and send a clear signal that Europe’s long-term security and prosperity lie in accelerating the energy transition—not expanding frontier fossil fuel extraction in one of the planet’s most vulnerable regions. Failing to reaffirm its commitment to a ban would instead place the EU alongside actors that are pursuing expanded Arctic fossil fuel development (Gaulin, 2023), contributing to regional destabilization and sending a deeply counterproductive signal at a time when steady, climate-aligned leadership is most needed.



## References

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