



# UNITED NATIONS OCEAN CONFERENCE NICE, FRANCE 2025

## UNOC3 Conference Side Event

### **0292: The Scrubber case – time for glocal solutions**

**June 10, 2025, 11:30 – 12:45, at Université Côte d'Azur,  
ELMI, Campus Saint Jean d'Angély, 5 rue du 22ème BCA  
06300 Nice. Room 2B08.**

### **Organized by:**

**Swedish Institute for the Marine Environment,  
Governments of Sweden and Denmark, Oskar**

### **Background**

Today, more than 25 percent of the bunker volume used by global shipping is heavy fuel oil, only allowed to use in combination with a scrubber resulting in discharge of large volumes of polluted and acidic wash water to the sea. Scientific consensus that scrubbers are posing an unacceptable risk for marine ecosystems, calls for regulation. IMO is striving for harmonized global regulations, a slow process causing conflicting perspectives with coastal nations responsible to act for protection of the marine environment within their jurisdiction.

### **Key Issues discussed**

Scrubbers imply a continued use of heavy fuel oil, and there is consensus within the scientific community that the use of scrubbers is harmful to the marine environment. The

shipping company Wallenius Lines proposed a global regulation on scrubbers and high-sulphur fuels.

Use of scrubbers is in conflict with UNCLOS as countries have a duty not to transfer one type of pollution into another (article 195). Swedish government highlighted their bill to protect the sea with several shipping-related measures. Sweden bans discharges from open-loop scrubbers in territorial water from 1 July 2025. Denmark has also decided about a similar ban in the Danish territorial sea. Use of closed loop will be banned from 1 July 2029 in Denmark, and 1 January in Sweden. France has a ban within 3 nautical miles since 2022, and France will consider extending its ban for both open and closed loop scrubbers if regional and global measure prove insufficient.

Regional coordination, such as Oskar, can pave the way for new agreements on global ban through the IMO, by the dialogue of contracting parties that can agree on stricter rules.

IMO consists of countries and decisions are taken together. Exhaust gas cleaning system (scrubbers) can operate as a result of the 2020 agreement to reduce sulphur in marine fuel oil. This is complemented by IMO guidelines and countries are encouraged to take action and propose suggestions for future regulations.

### **Key recommendations for action and voluntary commitments**

Progress is often faster at the national level than globally, where differing views among countries can slow decision making. National bans show political leadership, and as more countries act, global momentum increases. While current bans may appear fragmented, they mark an important base point. Staggered phase-out dates for different scrubber types, such as open and closed-loop systems, were suggested as a way forward. The idea of putting pressure on shipowners was also raised, highlighting the role of NGO:s and the financial sector.

Overall, participants agreed that global regulations on scrubbers would be ideal, but national and regional action is essential to drive progress and guide future IMO and regional decisions. Panellists emphasized the need to correct flawed regulations - such as allowing scrubbers - and called for decisive, coordinated action at all levels: national, regional, and global.

In [#OceanAction58813](#), Denmark has in addition to the already mentioned ban in territorial water also decided to work towards a regional ban on discharges of wastewater from scrubbers in OSPAR and HELCOM and globally through the IMO. Sweden has decided a similar action and will continue the efforts for these discharges to be banned or restricted [#OceanAction58756](#).