



If ships continue using high-sulphur fuel in combination with scrubbers, ocean pollution will increase.

Legal concerns

The **MARPOL Convention** requires that maritime nations do not allow damage to the environment, human health, property, or resources, or those of other States.

Scrubbers turn an air pollution problem into a water pollution problem which is unacceptable under the UN Convention on the Law of the Sea.

Non-compliance

A study in the southern North Sea found ships emitting **high SOx** levels, which is likely due to **malfunctioning of scrubbers**.

These findings are of special concern for **coastal inhabitants** due to impacts of sulphur emissions on human health.

Progress in regulation

The number of scrubber bans and restrictions is increasing. By February 2023, **45 countries** had introduced over **90 bans and restrictions** on scrubbers.

Call for action

Noting that reducing pollution at source remains the best option to tackle pollution, we ask that:



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Coastal States and ports should ban the discharge of scrubber wastewater in their waters



Maritime authorities should stop approving scrubbers for use on ships



Shipowners should not use high sulphur fuels in combination with scrubbers but opt for cleaner distillate fuels, and not LNG, en route to full decarbonisation



IMO should develop regional bans in ecologically, environmentally, and culturally significant areas including the Arctic, and ultimately ban scrubbers globally

Pay-back time for scrubbers



A recent modelling study showed a strong economic incentive to install scrubbers:

over **95%** of ships with **open-loop** scrubbers reached **break-even** in less than **5** years after installation

some vessels reached break-even within **1** year

BUT the cumulative societal damage associated with scrubber use is not accounted for.

Reference: PPR 11 INF.20 Submitted by Sweden.

