

Dear OSPAR Secretariat,

We deeply value the crucial role that OSPAR plays in driving ambitious and science-based regional marine protection efforts. OSPAR's long-standing commitment to safeguarding marine ecosystems serves as a model for regional cooperation.

We are aware of the ongoing discussions regarding the **planned 12-nautical-mile discharge ban for wastewater from exhaust gas cleaning systems (EGCS)**. While we have not yet engaged with the Secretariat on this specific topic, we would like to share our perspective and raise concerns about recent reports suggesting that discussions might be delayed.

From our perspective, deferring action on this issue contradicts the principles and commitments that underpin OSPAR's mission to protect and conserve the marine environment of the North-East Atlantic. For instance, the **precautionary principle is central to addressing environmental risks** where uncertainty exists. Given the nature of EGCS wastewater and the established risks, **waiting for consensus at the IMO would be a missed opportunity for OSPAR to exercise leadership in protecting the North-East Atlantic.**

Rather, **the outcomes of PPR 11 should be seen as a strong endorsement of the necessity for regional regulations** regarding the disposal of EGCS wastewater. These outcomes also encourage individual states to adopt such regional measures. **OSPAR should interpret this as a clear signal from the IMO to implement regional actions** to protect the marine environment within the OSPAR framework. Moreover, **coastal states have the right to ban discharges within their territorial waters**, and the rights of shipowners to pollute should not outweigh the rights of coastal states to protect these waters. Therefore, **OSPAR should make unified efforts to support coastal states in their right to a clean marine environment.**

The IMO discussions on emission factors, while important, should not delay action where harm is already evident. While ongoing debates at the IMO may focus on the precise extent of the impacts, there is clear evidence that EGCS wastewater has negative consequences for marine ecosystems. **Numerous studies¹ have conclusively demonstrated** that scrubber discharges release harmful pollutants, including polycyclic aromatic hydrocarbons (PAHs), heavy metals, and other toxic substances, into the marine environment. These contaminants not only pose immediate risks but also accumulate in marine ecosystems, leading to long-term damage to biodiversity and **creating significant barriers to achieving Good Environmental Status (GES)**. This underscores the need for urgent preventive measures, irrespective of unresolved discussions on the exact magnitude of the harm.

OSPAR's goals should be driven by its own commitments to the precautionary principle and the protection of marine ecosystems. Consequently, **the 12-nautical-mile discharge ban for wastewater from EGCS should be adopted at the OSPAR ministerial meeting in summer 2025** regardless of the ongoing discussions at the IMO about the precise quantification of the EGCS' emissions factors.

Delaying action would also set a concerning precedent, implying that progress on regional protection can be indefinitely postponed in favor of global-level consensus, even when robust evidence supports immediate intervention. **By advancing the discharge ban, OSPAR would demonstrate its commitment to proactive, science-based decision-making, reinforcing its role as a regional leader in marine conservation.**

Thank you for considering our input.

Yours sincerely



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Clean Shipping Coalition
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NABU e.V.
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North Sea Foundation
Maarten Verdaasdonk



Opportunity Green
Blánaid Sheeran



Seas at Risk
Sian Prior



Zero - associação sistema terrestre sustentável
Carolina Silva

¹ E.g. Jalkanen; Jukka-Pekka, Fridell; Erik, Kukkonen; Jaakko, Moldanova; Jana, Ntziachristos; Leonidas, Grigoriadis; Achilleas, Moustaka; Maria, Fragkou; Evangelia, Tsegas; George, Maragkidou; Androniki. (2024). Environmental impacts of exhaust gas cleaning systems in the Baltic Sea, North Sea, and the Mediterranean Sea area. Finnish Meteorological Institute, Helsinki, Finland, January 2024, 181pp, ISBN: 978-952-336-189-8 <https://doi.org/10.35614/isbn.9789523361898>

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