

# Central government efforts to reduce discharge of harmful substances into the sea from shipping

## Summary

Shipping contributes to several pressures on the marine environment in the Baltic Sea and the North Sea through actions such as discharges of harmful substances in washwater from exhaust gas cleaning (scrubber water) and from the cleaning of cargo tanks. To reduce discharges into the sea, sufficient controls of discharges and adequate capacity of port reception facilities are needed. This audit has examined the efforts of the Government, the Swedish Agency for Marine and Water Management, the Swedish Coast Guard, the Swedish Maritime Administration and the Swedish Transport Agency to reduce discharges of noxious liquid substances into the sea from shipping.

The overall conclusion is that central government measures to reduce discharges of harmful substances into the sea from shipping have not been effective. The Swedish National Audit Office's assessment is that most of the current measures are not expected to lead to actual reduced discharges of harmful substances in the next few years.

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## Sweden's regulations on discharges are not enough



Swedish regulations provide greater opportunities than numerous other countries for ships to discharge noxious liquid substances into the sea. So far, neither the Government nor the Swedish Transport Agency have utilised the existing possibilities to decide to regulate scrubber water discharge into Sweden's territorial waters. However, in June 2024, the Government referred a proposal to introduce a ban in 2025 on scrubber water discharge throughout Sweden's territorial waters. In the case of cargo residues with noxious liquid substances, Swedish regulations provide greater scope for interpretation compared with international convention requirements on the circumstances under which discharges are permitted. Under Swedish regulations, after unloading, ships can exit the port to discharge cargo residues in international waters and then return to load new substances. Likewise, Sweden has not implemented the international convention requiring the central government to appoint or authorise surveyors to monitor and approve mandatory flushing (prewash) of cargo tanks used for noxious liquid substances. All in all, there is a risk that discharges into the sea and thus the environmental impact will not decrease.

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## Insufficient measures concerning capacity of port reception facilities



Adequate reception capacity in ports is fundamental for reducing discharges of noxious liquid substances into the sea from shipping. As more substances are being banned from being discharged into the sea and thus must be delivered in port, the need for adequate capacity of port reception facilities is growing. This applies, for example, if Sweden would introduce a ban on scrubber water discharge in Swedish territorial waters. There are several indications that port reception capacity is not always adequate. The Swedish Transport Agency does not have an overview of ports' reception capacity which means there is a lack of data needed to develop regulation, approval and monitoring. Regulations on reception of ship waste in port do not in themselves ensure that the ports have reception capacity. In connection with its examination of ports' waste management plans, the Swedish Transport Agency likewise does not make any detailed assessment of whether the capacity of the port reception facilities is adequate. The issue of adequate port reception capacity is also not addressed by the Swedish Transport Agency's supervision of waste management plan implementation. The supervision of port operations by environmental supervision agencies (county administrative boards or municipalities) covers waste management and may then also concern the issue of reception capacity. However, the Swedish Transport Agency and the environmental supervision agencies have limited contact with each other regarding supervision of reception and management of waste from ships.

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## Few actions to reduce discharges into the sea from shipping



There are few other central government initiatives that are expected to lead to reduced discharges of noxious liquid substances into the sea within the next few years. The Swedish Agency for Marine and Water Management is responsible for developing and establishing the Swedish programme of measures for the marine environment. This programme includes a measure to minimise the environmental impact of shipping, for which the Swedish Transport Agency is responsible. Although the Swedish Transport Agency has developed an implementation plan for this measure, it contains few concrete actions. The Swedish Agency for Marine and Water Management has not highlighted research needs regarding discharges of cargo residues. The Swedish Coast Guard's investigations of suspected illegal discharge into the sea of noxious liquid substances almost never lead to legal action, partly due to lacking methods for calculating discharge volumes. The Swedish Maritime Administration's environmental differentiation of fairway dues is a weak incentive for shipping to reduce discharges of scrubber water and other noxious liquid substances into the sea.

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## Recommendations

## To the Government

As soon as possible, introduce a ban on scrubber water discharges throughout Sweden's territorial waters.

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- As soon as possible, introduce a ban on scrubber water discharges throughout Sweden's territorial waters.
- Review Swedish regulations to ensure that they comply with international convention requirements regarding
  - 'proceeding on route' as a basis for allowing discharge of cargo residues
  - surveyors who monitor and approve prewash of cargo tanks must be appointed or authorised by the state.

## To the Swedish Agency for Marine and Water Management

- In consultation with the Swedish Transport Agency, for a future programme of measures for the marine environment, consider developing more concrete and feasible actions under the measure to minimise the environmental impact of shipping.
- In the Agency's research need priorities, consider also highlighting research on discharges of cargo residues.

## To the Swedish Coast Guard

- Investigate how the development of methods to calculate emission volumes and noxious liquid substances other than mineral oil can be implemented and financed.

## To the Swedish Maritime Administration

- In the ongoing review of the fairway dues model, consider how incentives to reduce scrubber water discharges can be enhanced and how incentives to reduce discharge of cargo residues with noxious liquid substances can be introduced.

## To the Swedish Transport Agency

- Ensure that the capacity of actual port reception facilities for noxious liquid substances is sufficient by
  - analysing ports' actual reception capacity in relation to vessels' needs to deliver noxious liquid substances in port

- in the examination of ports' waste management plans, including an assessment of actual sufficiency of the reported reception capacity
- improving monitoring of ports' implementation of waste management plans.
- Organise cooperation with environmental supervision agencies that monitor port operations to ensure regular cooperation that includes monitoring of both reception and management of ship waste.
- In consultation with the Swedish Agency for Marine and Water Management, consider developing concrete and feasible actions in the implementation plan under the measure to minimise the environmental impact from shipping in the current programme of measures for the marine environment.