



Council of the European Union  
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## **CONTRIBUTION**

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From:	General Secretariat of the Council
To:	Working Party on Shipping
N° prev. doc.:	WK 15302/25
N° Cion doc.:	WK 14937/25
Subject:	Preparation of IMO/PPR 13 (London, 9-13 February 2026) – Draft Union submission to the 13th session of the International Maritime Organization's Sub-Committee on Pollution Prevention and Response proposing a new regulation in MARPOL Annex VI on the protection of Particularly Sensitive Sea Areas from Exhaust Gas Cleaning System's discharge waters - Comments by Estonia

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Delegations will find attached comments by Estonia on the subject above.

**WK 15302/25**

**Draft Union submission proposing a new regulation in MARPOL Annex VI on the protection of PSSA from Exhaust Gas Cleaning System's discharge waters**

Estonia supports the Presidency's compromise proposal in general, but we have some comments and a new text proposal.

In accordance with the requirements of Regulation 14 of Annex VI to MARPOL 73/78, ships are required to use fuel with a sulphur content not exceeding the limits specified in paragraphs 14.1 or 14.4 of that regulation. Regulation 4, however, provides for the possibility of using alternative technical solutions to achieve this objective.

These alternatives include, among other things, exhaust gas cleaning systems.

Shipowners have made significant investments in the purchase and installation of cleaning equipment in accordance with IMO guidelines. Therefore, it is not justified to apply restrictions in a way that would penalize operators who have decided to comply with the standards allowing alternative solutions and have made significant investments to that end.

Considering above mentioned and the fact that other extensive environmental requirements, including obligations arising from the EU ETS will have to be met in the coming years, we consider it necessary to establish a transition period for vessels which use scrubbers.

We believe that a reasonable solution would be to provide for an exemption whereby the restrictions would not apply to exhaust gas cleaning systems installed for example [x and earlier]. Practice shows that shipowners are already moving towards the use of more stable and environmentally friendly technologies, and the use of exhaust gas cleaning systems does not represent a long-term strategic solution.

**Our new text proposal:**

Considering that the use of exhaust gas cleaning systems is permitted as an alternative means of compliance under Regulation 4 of Annex VI to MARPOL, we have a new proposal:

**„New paragraph 9:**

*„The prohibition should not apply to all exhaust gas cleaning systems installed in [x and earlier], provided that such systems and their discharge water continue to comply with the relevant IMO requirements“.*