

# 2025 Survey Report on Nordic Arbitral Institutions



## Mapping Nordic Arbitral Institutions

Natalia Petrik

Westerberg & Partners

---

## REPORT FINDINGS

---

### INTRODUCTION

This report forms part of the Nordic Commercial Arbitration Forum, a bi-annual conference bringing together primarily arbitration practitioners from the region. First launched in March 2025 in Stockholm, the forum provides a platform for discussing developments in Nordic arbitration, fostering collaboration, and strengthening the region's position on the global arbitration arena.

The report, based on a January 2025 survey of six Nordic arbitral institutions, aims to deepen understanding of arbitration practices in the region and raise awareness of its institutions, services, and procedures. It also aims to assist arbitration users in making informed decisions when choosing venues and rules.

The study was proposed by Johnny Herre and Therese Isaksson, two leading Swedish arbitration practitioners, whose vision of mapping Nordic arbitral institutions through a comparative approach was instrumental to this research. We gratefully acknowledge their contribution, as it has shaped the direction of this study.

We also extend our sincere gratitude to all participating institutions for their support and contributions. Their willingness to share data has been essential in creating this report.

### SCOPE OF STUDY

This report analyzes the data collected from six Nordic arbitral institutions: the Danish Institute of Arbitration (DIA), the Finland Arbitration Institute (FAI), the Nordic Arbitration Center (NAC) in Reykjavik, the Nordic Offshore and Maritime Arbitration (NOMA, which has no physical office), the Arbitration and Dispute Resolution Institute of the Oslo Chamber of Commerce (OCC), and the SCC Arbitration Institute (SCC). The report compares their structure, services, caseloads, arbitrator demographics, and digitalization efforts. Additionally, the study also incorporates statistics from the International Court of Arbitration of ICC as a benchmark, offering a comparative perspective between Nordic institutions and global arbitration practices.

The statistics represent the 2024 caseload of Nordic institutions, except for NAC, which provided both its 2024 statistics and average data for 2017–2024 due to its small caseload. ICC data pertains to cases involving at least one Nordic party filed in 2023. The level of detail varies, as some institutions have more comprehensive data available than others. Nevertheless, by compiling and analyzing the provided information, the report offers a structured overview of (1) institutional governance, (2) services, (3) case characteristics, (4) arbitrator statistics and (5) digitalization and technology usage. The study concludes with key findings on factors critical to the development of arbitration, both within individual jurisdictions and across the Nordics.

### **I. Institutional Governance**

The Nordics has six active arbitral institutions, four of which — FAI (Finland), NAC (Iceland), OCC (Norway), and SCC (Sweden) — operate as divisions of local chambers of commerce. The remaining two, DIA (Denmark) and NOMA (the Nordic Offshore and Maritime Arbitration Association, with no physical location), were established by professional associations and operate as standalone organizations. DIA was founded by the Danish Bar and Law Society, the Danish Society of Engineers, the Association of Danish Judges, SMEdenmark, and the Federation of Danish Engineers. NOMA was founded as an arbitration institution focused on shipping and offshore energy by the Maritime Law Associations of Sweden, Finland, Denmark, and Norway.

With the exception of NOMA, all institutions have a governance structure comprising a decision-making body, the Board, and an administrative body, the Secretariat. SCC and FAI bring international expertise to their Boards. SCC has the highest proportion, with 9 out of 15 members being international, while 11 participate in decisions on Swedish/Scandinavian cases. The FAI Board includes 7 international members. The Secretariat is staffed by employees of the respective Chamber of Commerce or, in the case of DIA — a standalone organization — by DIA itself. The number of employees varies significantly, ranging from 15 at SCC to one at NAC.

NOMA operates without permanent staff or an office. Its structure includes Contact Persons, a Board of Directors, and a Procedural Committee. The Board has two representatives from each of its founding Maritime Law Associations in

Norway, Sweden, Denmark, and Finland. For procedural decisions, it appoints a Procedural Committee with one representative from each country and a president from one of them.

Despite these structural differences, the institutions share key governance principles. All Boards consist of external experts, ensuring independent decision-making. DIA, FAI, NAC, OCC, and SCC do not appoint their own Board members as arbitrators during their tenure. At NOMA the parties or NOMA's Procedural Committee may appoint a Board member but the Procedural Committee may not appoint one of its own members. In NOMA arbitrations, tribunals are primarily appointed by the parties.

None of the institutions maintain formal arbitrator lists or require arbitrators to be members of the institution, allowing flexibility in appointments based on institutional rules and party agreements. A summary of the institutions' organizational data is provided in Table 1.

Table 1.

	<b>Location</b>	<b>Founded</b>	<b>Affiliation</b>	<b>Board</b>
<b>DIA</b>	Danmark	1981	Standalone	11 Danish members
<b>FAI</b>	Finland	1911	Part of Finland Chamber of Commerce	10 Finnish and 6 international members
<b>NAC</b>	Iceland	1921	Part of Iceland Chamber of Commerce	5 Icelandic members
<b>NOMA</b>	n/a	2017	Standalone	8 Nordic members
<b>OCC</b>	Norway	1984	Part of Oslo Chamber of Commerce	12 Norwegian members
<b>SCC</b>	Sweden	1917	Part of Stockholm Chamber of Commerce	6 Swedish and 9 international members

## **II. Services offered**

The surveyed institutions vary significantly in their service offerings and can be grouped into two categories: SCC, DIA, and FAI, which provide a broader range of services, and OCC, NAC, and NOMA, providing more basic dispute resolution procedures.

All institutions, except for NAC, administer arbitration, expedited/simplified arbitration, mediation, and the appointment of arbitrators in ad hoc and UNCITRAL arbitrations. NAC offers arbitration and mediation. Emergency arbitration, which allows for the appointment of an arbitrator to grant interim relief at the pre-arbitral and pre-referral stage are provided by DIA, FAI, and SCC. Express arbitration/express dispute assessment, the appointment of experts, and similar services, are offered by DIA and SCC.

### **1. SCC, DIA and FAI**

SCC and DIA stand out for their wide range of services. Beyond its core services, SCC offers SCC Express (Rules for express dispute assessment), facilitates the appointment of expert evaluators, and provides technical solutions such as the SCC Ad Hoc Arbitration Platform, a software designed specifically for ad hoc arbitrations. SCC also leads in technical solutions for SCC arbitrations, offering the SCC Platform, a secure system for file and communication sharing.

DIA has also introduced innovative mechanisms, such as Interim Arbitration for evidence-taking, Dispute Board services, IT legal/technical opinions, and expert appointments, similar to those offered by SCC. DIA's Express Arbitration service enables parties to submit resolution proposals, with the arbitrator selecting the most reasonable one as a binding award, subject to fallback provisions.

Both DIA and SCC offer fundholding services for ad hoc arbitrations.

FAI provides a solid range of basic services, comparable to those of SCC and DIA, with a caseload similar to theirs, as detailed below. FAI is also in the process of introducing a case management platform to enhance its case administration.

## **2. NAC, OCC and NOMA**

NAC, OCC, and NOMA form a group of smaller institutions.

NAC, while providing arbitration and mediation, does not extend its services to emergency arbitration or other procedural mechanisms, such as expedited/simplified arbitration. NAC does not assist with the appointment of arbitrators in ad hoc or UNCITRAL arbitrations. However, it distinguishes itself by including hearing facilities in its institutional fee.

OCC has a limited role in institutional arbitration in Norway, where ad hoc arbitration is more common. However, as shown below, it stands out for its highly competitive fees compared to other institutions.

NOMA, with its industry-specific focus on offshore and maritime disputes, has been quite successful in developing light-touch rules, including limited services (if needed) at low cost. As a result of its governance structure, there are no costs involved in applying the NOMA arbitration rules, except that NOMA may require a fee if called upon to deal with e.g. procedural issues or appointments as per the rules.

## **3. Hearing facilities**

The report shows certain differences in institutional capacity for accommodating in-person proceedings and providing hearing facilities and related services.

As previously noted, NAC includes hearing facilities in its institutional fee, while OCC, DIA and SCC offer facilities for additional fee. DIA offers specialized hearing facilities and accompanying services to its tribunals, as well as to ad hoc tribunals. SCC provides hearing facilities only for smaller cases.

The tables below compare the Nordic institutions with ICC, starting from the most comprehensive to the more basic service providers.

## 2025 Survey Report on Nordic Arbitral Institutions

Table 2. List of services

ICC	DIA	SCC	FAI
Arbitration Expedited arbitration Mediation Ad hoc appt.s Emergency arbitration  Experts appointments Docdex Dispute Boards ICANN New gTLD Dispute Resolution Hearing facilities	Arbitration Simplified arbitration Mediation/UNCITRAL Ad hoc appt.s  Emergency arbitration Express arbitration Interim arbitration (evidence-taking)  Expert appointments IT legal/technical opinions Dispute Boards Hearing facilities Fundholding	Arbitration Expedited arbitration Mediation Ad hoc appt.s  Emergency arbitration Expert appointments SCC rules for express dispute assessment  Fundholding Ad hoc Platform Certification and notarisation of SCC arbitral awards  Fundholding	Arbitration Expedited arbitration Mediation Ad hoc appt.s Emergency arbitration

NOMA	OCC	NAC
Arbitration Expedited arbitration Mediation Ad hoc arbitrator appointments	Arbitration Expedited arbitration Mediation Ad hoc arbitrator appointments Hearing facilities	Arbitration Mediation Hearing facilities

Table 3. All institutions compared to ICC

Services offered	DIA	SCC	ICC	FAI	NOMA	OCC	NAC
Arbitration	x	x	x	x	x	x	x
Ad hoc/ UNCITRAL appointments	x	x	x	x	x	x	
Mediation	x	x	x	x	x	x	x
Expedited/ simplified arbitration	x	x	x	x	x	x	
Emergency arbitration	x	x	x	x			
Expert appointment	x	x	x				
Other ADR (DAB, DRB, Express)	x	x	x				
Hearing facilities	x	x	x			x	x
Fundholding, and other admin	x	x					
Interim arbitrator	x						

### III. Case characteristics

This chapter illustrates patterns in case types, nationality of the parties, arbitration seats and disputed values, benchmarking the figures and other data against ICC.

#### 1. Number of cases

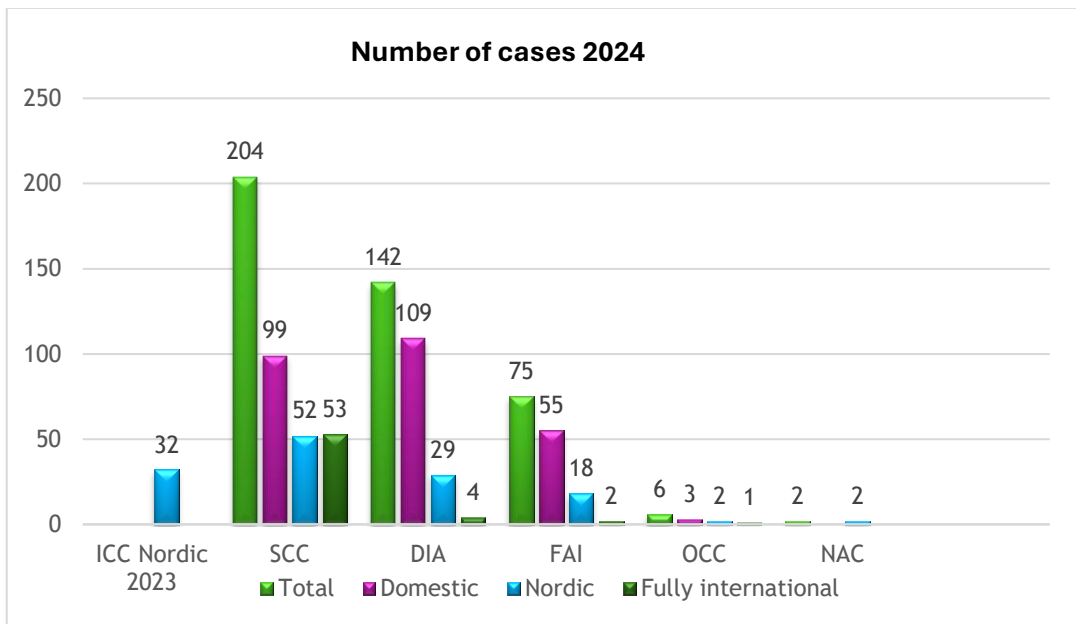
In aggregate, the total caseload of SCC, DIA, FAI, NAC, and OCC in 2024 counted 429 cases. 266 cases or 62% of the aggregate caseload concerns fully



domestic disputes. DIA, FAI, OCC and NAC have predominantly Nordic caseloads, while SCC administers more international disputes.

Cases involving at least one Nordic party (103) make up 24% of the total caseload across all institutions. Fully international cases (60) account for 14% of the total caseload, with SCC handling the majority.

Table 4.



SCC has the largest caseload which stands for almost half of the total caseload, followed by DIA, handling roughly one third of cases, and FAI which stands for approximately 17%.

The international caseload of DIA, FAI, OCC, and NAC consists largely of Nordic disputes involving at least one Nordic party. Purely international cases are rare, with only four at DIA, two at FAI, and one at OCC.

Data for NOMA is not publicly available, but estimates suggest it handles approximately two to three Nordic cases per year.

ICC's 2023 caseload involving at least one Nordic party totaled 32 cases, representing 3.8% of ICC's overall caseload of 838 cases. The relatively small number of Nordic cases at ICC, compared to the total caseload of Nordic institutions, indicates that ICC is not the primary forum for Nordic parties. Overall, these figures suggest that most Nordic arbitration users prefer regional institutions over ICC for resolving their disputes. From a statistical perspective,

SCC stands as the leading regional alternative to ICC, whereas DIA, FAI, OCC and NAC are more oriented towards the Nordic and national arbitration markets.

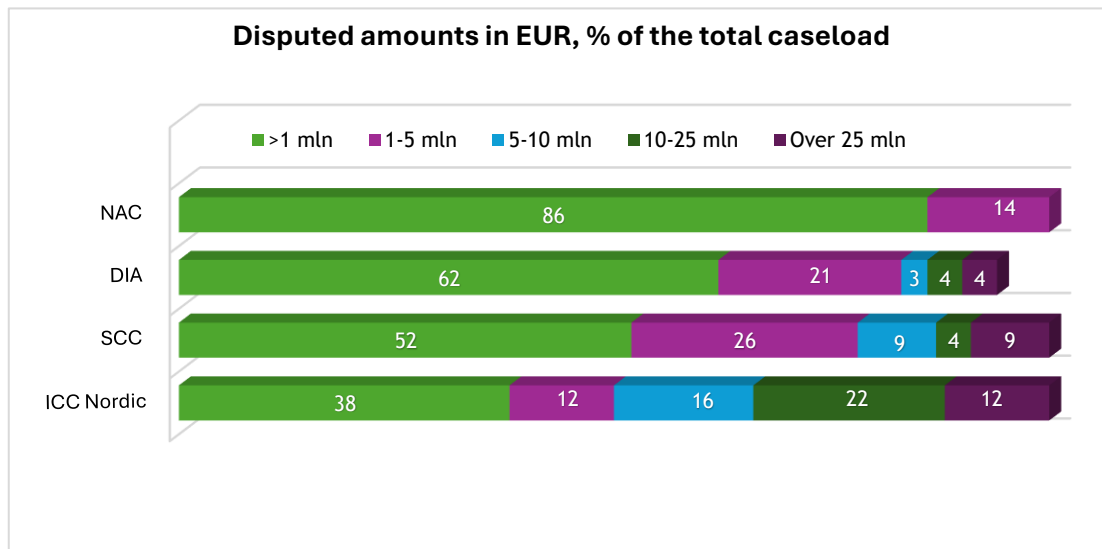
**2. Disputed amounts**

The following statistics are based on figures provided by ICC, SCC, DIA, NAC and OCC, reflecting the typical size of claims submitted to each institution.

ICC and SCC stand out as forums for disputes of higher value, with the majority of their cases involving claims exceeding EUR 1 million. In contrast, a significant proportion of disputes administered by NAC (based on the cases submitted in 2017 – 2024) and DIA —84% and 62%, respectively—fall below this threshold. Notably, all claims submitted to NAC remain under EUR 5 million. NAC’s data concerns its total caseload in 2017 – 2024.

ICC and SCC also reported both the highest and lowest disputed amounts in 2023 and 2024, respectively. For ICC cases involving Nordic parties, the largest claim reached EUR 81,156,731, while the smallest amounted to EUR 50,000. SCC, in turn, registered a high of EUR 4,636,285,000 and a low of EUR 3,781. The SCC and ICC figures indicate that the average claim value is significantly higher in ICC and SCC proceedings compared to the other Nordic institutions, which primarily handle small to mid-range claims.

Table 5.



### 3. Top three types of disputed agreements

Construction and M&A transactions are among the most common sources of disputes across the region. ICC also reported that construction was one of the leading categories of disputes involving Nordic parties in 2023. Sale and purchase agreements are similarly prevalent.

Table 6. Top types of disputed agreements

ICC Nordic cases 2023	SCC 2024	DIA 2024	FAI 2024	NAC 2017- 2024
<b>Construction</b>	M&A Delivery Purchase agreement	Cooperation Agreement Shareholder Agreement M&A	Service Agreement <b>Construction</b> Sale and Purchase	Delivery Employment <b>Construction</b>

### 4. Top seats of arbitration

SCC cases are mainly seated in Stockholm, FAI cases in Helsinki, and Icelandic cases in Reykjavik, OCC in Oslo and Bergen, reflecting the practice of choosing the seat based on each institution's country. London is included as one of the seats of SCC arbitrations, which confirms SCC’s higher level of internationalization. In contrast, ICC cases involving Nordic parties are often seated in non-Nordic locations like London and Geneva, which is consistent with ICC’s practice.

Table 7. Top seats of arbitration

ICC Nordic cases 2023	SCC 2024	DIA 2024	FAI 2024	OCC 2024	NAC 2017-2024
Copenhagen Paris Geneve London	Stockholm Gothenburg London	Copenhagen	Helsinki Tampere Oulu Turku	Oslo Bergen	Reykjavik

## 5. Top nationalities of the parties

The geographic origin of the parties highlights the internationalization of Nordic arbitration institutions. While the majority of cases, as noted above, involve domestic parties, the international segment is primarily focused on neighboring Nordic and European countries.

SCC has a broad geographic reach, similar to ICC, with parties from both within and outside the EU. DIA's cases are mainly concentrated in Europe, with parties from Denmark, Germany, Belgium, and Sweden. FAI has strong international outreach, particularly in Europe and the Baltics, reflecting Finland's economic ties and proximity to the region. In contrast, OCC and NAC remain more localized, with a party pool predominantly made up of Nordic entities.

Compared to the ICC, parties at DIA, FAI, OCC, and NAC are primarily from the Nordics or the EU.

Table 8. Top nationalities of the parties

ICC Nordic cases 2023	SCC 2024	DIA 2024	FAI 2024	NAC 2017-2024
Norway	Sweden	Denmark	Finland	Iceland
Sweden	Russia	Germany	Estonia	Finland
Denmark	Great Britain	Belgium	Uruguay	
Spain	Norway	Sweden	Germany	Russia
Germany	Finland		Italy	Danmark
Finland	Latvia		Lithuania	Bulgaria
France	Germany		Sweden	
USA	Switzerland			
Romania	Ireland			
Netherlands	China			

## 6. Duration of proceedings

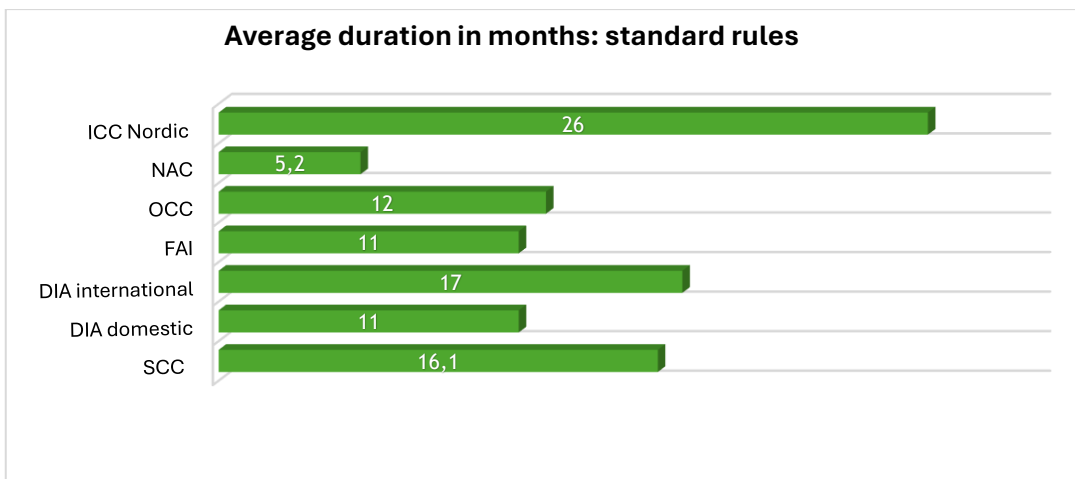
The average duration of proceedings in the below tables covers cases concluded with the arbitral award. The average duration under the standard arbitration rules is relatively consistent across the Nordic institutions, with SCC, FAI, and DIA's cases requiring approximately 11 months to the award.

DIA's breakdown indicates that DIA's international cases take approximately 3 months longer than domestic. While similar breakdowns are not provided for

the other institutions, a reasonable assumption can be made that international cases generally take longer across all of them. Logistical complexities, such as coordinating and scheduling hearings across different countries, are likely to contribute to this extended duration.

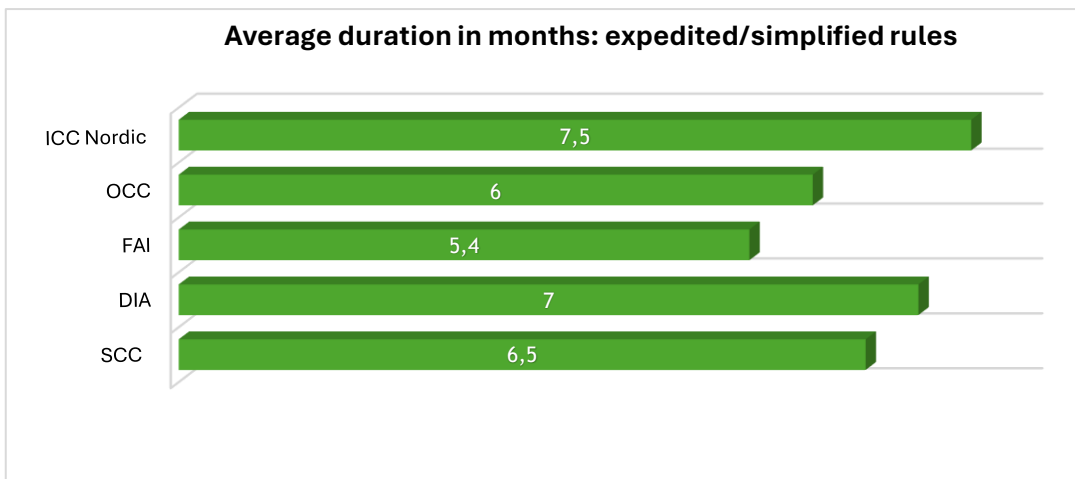
Benchmarking against the ICC, the report shows that ICC proceedings take an average of 26 months (2.2 years) from initiation to award—more than twice as long as FAI cases and approximately 1.5 times longer than those of the SCC and DIA. This is largely due to higher disputed values and more hands-on administration, involving scrutiny and confirmation of awards in ICC proceedings.

Table 9.



The duration of expedited/simplified proceedings is quite similar for all institutions, ranging from 7.5 months (ICC) to 5.4 months (FAI) on average.

Table 10.



### 7. Median costs

Table 11 summarizes the estimated median fees in EUR for proceedings with a three-member tribunal and disputed amounts of 1 million, 10 million, and 25 million EUR. The data indicates that ICC is consistently the most expensive option across all categories. For disputes involving 1 million EUR, FAI's costs slightly surpass those of SCC; however, SCC's costs are marginally higher in the 10 million and 25 million EUR categories. Both SCC and FAI are more expensive than DIA, which falls into the mid-range cost category. OCC and NAC, on the other hand, are positioned in the lower-cost range, with costs notably lower than those of the other institutions.

Table 11. Median costs in EUR

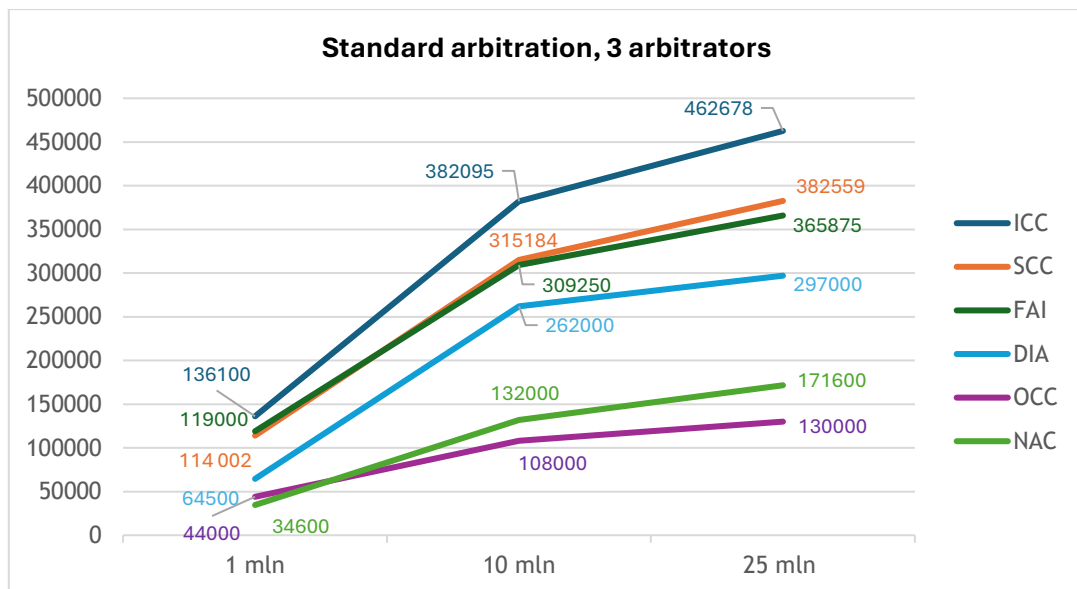


Table 12 below compares the median costs for standard arbitration with a one-member tribunal and a disputed value of 1 million EUR. In this scenario, the cost pattern shifts, with SCC slightly surpassing ICC. FAI's costs follow closely ICC, while DIA falls into the mid-range category, significantly below the costs of SCC, ICC, and FAI. NAC and OCC follow the pattern and correspond to the lowest cost segment on the chart.

Table 12. Median costs, standard arbitration

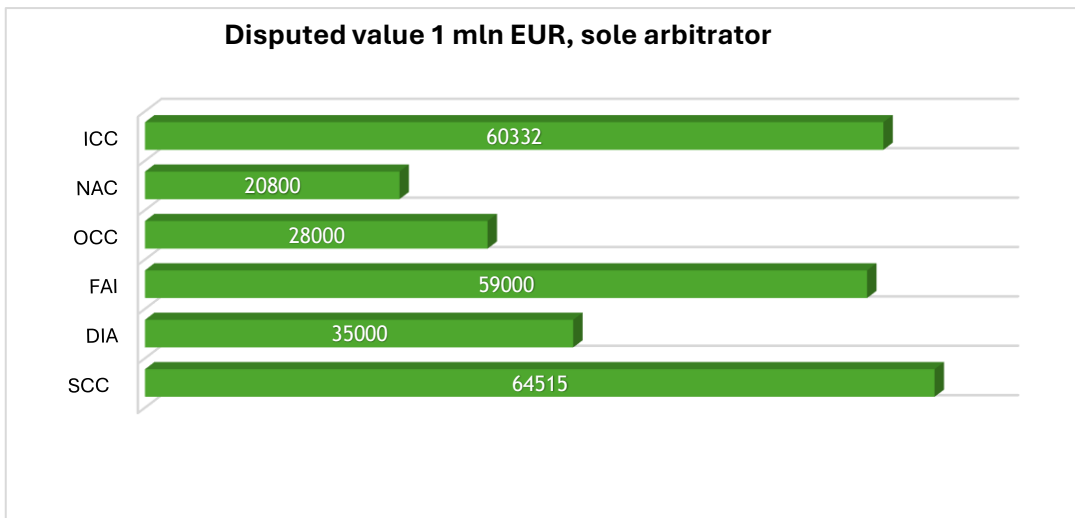
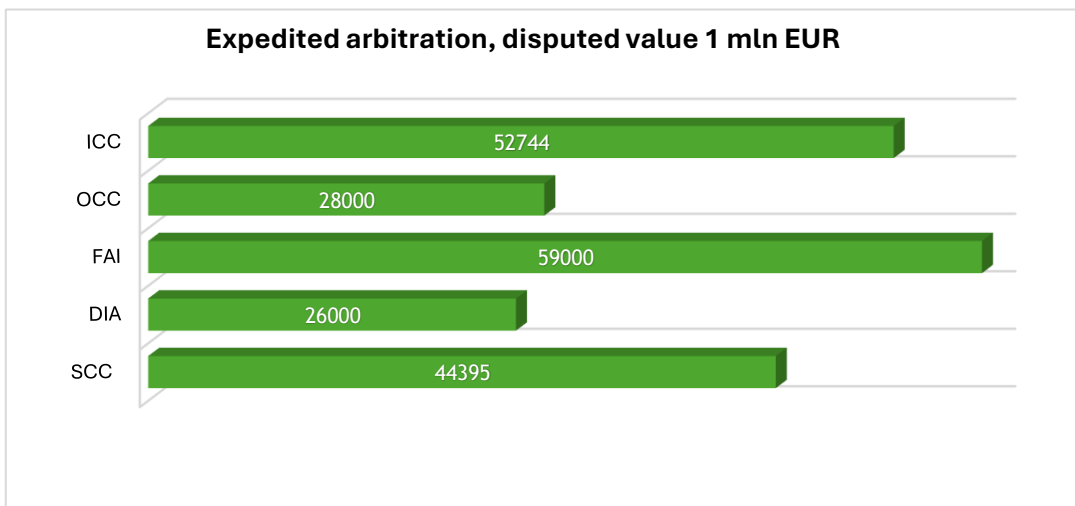


Table 13 presents the median costs for expedited/simplified arbitration involving a disputed value of 1 million EUR. In this scenario, FAI has the highest cost due to using the same cost table for both standard and expedited arbitration. ICC's costs are slightly lower, followed by SCC in the mid-range. OCC and DIA have the lowest median costs.

Table 13. Median costs



## IV. Arbitrator statistics

The statistics presented below analyses appointments by nationality of arbitrators, number of arbitrators, and appointment of women arbitrators.

### 1. Top nationalities

Table 14 indicates the top five most frequent nationalities of arbitrators. In the case of ICC, the fifth position is jointly occupied by Spanish and German arbitrators, both having received three appointments. For SCC, the fifth position is held collectively by Norwegian, Swiss, and Latvian arbitrators, each with four appointments.

Nordic institutions primarily appoint arbitrators from their own jurisdictions or regions, with SCC and FAI showing the highest level of internationalization. DIA has more regional focus, while NAC has appointed only Icelandic arbitrators to date. The most frequently appointed arbitrators from outside the Nordic region are from the UK and Switzerland. ICC, in contrast, has greater geographical diversity in cases involving Nordic parties. OCC's statistics of nationality is not available.

Table 14. Top nationalities of arbitrators

ICC 2023	Nordic	SCC 2024	DIA 2024	FAI 2024	NAC 2017 – 2024
UK		Sweden	Danmark	Finnish	Iceland only
France		Finland	Germany	Norwegian	
Sweden		Danmark	Norway	Swiss	
Switzerland		UK	Sweden	Austrian	
Spain		Norwegian		Estonian	
Germany		Switzerland			
		Latvia			

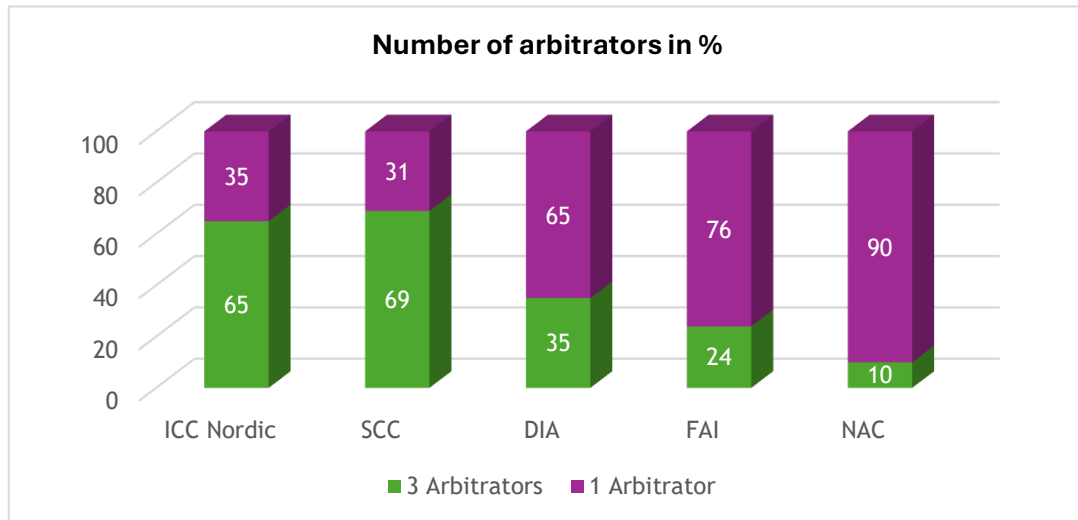
### 2. Number of arbitrators

Table 15 outlines the number of arbitrators in the proceedings conducted under the standard arbitration rules. A three-member tribunal is the predominant composition in ICC and SCC cases, accounting for 65% and 69% of the cases, respectively.



In contrast, the majority of cases in DIA, FAI, and NAC are handled by a sole arbitrator. At the DIA and NAC, this correlates with the relatively large proportion of low-value disputes in their respective caseloads.

Table 15. Number of arbitrators



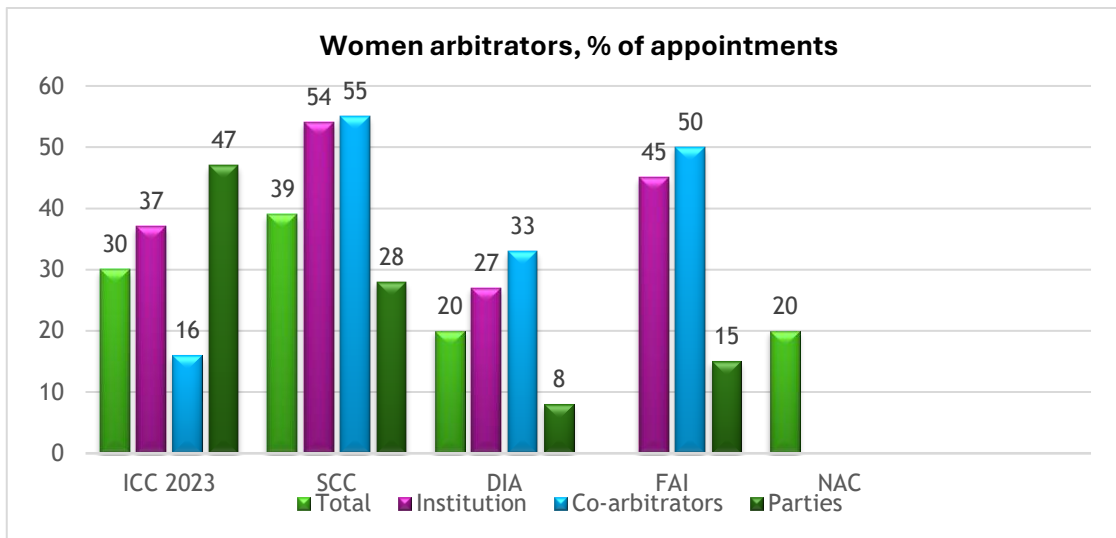
### 3. Women arbitrators

Table 16 presents the percentage of women arbitrators appointed by each institution, broken down by appointments made by the institution, by the parties, and by co-arbitrators in three-member tribunals.

The data shows that women remain underrepresented in all of the institutions when it comes to the total number of appointments. SCC has the highest percentage in all categories, followed closely by FAI in institutional and co-arbitrator appointments. DIA lags behind, with nearly half the percentage of women appointments compared to SCC and FAI. NAC also shows gender imbalance in its 2017 – 2024 caseload.

At ICC, the trend toward gender equality is also evident, but with a different pattern: the share of women arbitrators appointed by parties is higher than the share appointed by the institution. These statistics reflect the overall 2023 ICC caseload, not just Nordic cases.

Table 16. Women arbitrators



#### IV. Digitalization and technology usage

Table 17 analyzes the digitalization level of Nordic institutions, comparing them with ICC. Both ICC and SCC use tailor-made file exchange platforms, while FAI is in the process of developing a similar system. NAC manages its cases through an E-court system, a digital platform designed for courts and arbitral institutions. DIA and OCC currently lack such platforms. Additionally, SCC and FAI provide standardized Request for Arbitration forms, streamlining the initiation of arbitration. DIA, NAC, and OCC do not offer comparable tools. Notably, all Nordic institutions, have moved away from requiring paper submissions, indicating a broader shift toward digital case management.

Table 17. Digitalization and technology usage

	ICC	SCC	DIA	FAI	OCC	NAC
Online platform	Available	Available	Not available	Under development	Not available	Available
Standardized forms of submissions	Not available	Available	Not available	Available	Not available	Not available
Paper copies	Not required	Not required	Not required	Not required	Request for arbitration	Not required

## **V. Key takeaways and strategic outlook**

The Nordic arbitration institutions handled over 400 cases in 2024, dominating the region. Their total caseload far exceeds the number of ICC's Nordic-related cases. Most disputes are domestic, confirming the Nordic institutions' strong position in national markets. Additionally, each institution handles a significant number of cases involving at least one Nordic party, indicating their clear preference for regional arbitration

SCC is the major player and is the most globally oriented institution but also has a considerable Nordic user base. Its 50% international caseload includes roughly equal number of purely international and Nordic cases.

DIA and FAI handle solid case volumes but are less international in their caseloads. For both institutions, international cases — including those involving Nordic parties — account for approximately one-quarter of their caseloads.

OCC and NAC are small institutions focused on domestic and Nordic cases. NOMA has a similar caseload and plays a niche role in the offshore and maritime sectors.

All Nordic institutions offer cost- and time-efficient arbitration compared to the global players. At the same time, they vary significantly in service sophistication, international experience, visibility, and digitalization. OCC and NAC have potential for growth within their domestic markets and the Nordics by enhancing their visibility and expanding their services. NOMA's specialized expertise and no-cost model provide strong growth prospects both within and beyond the Nordic region.

SCC, DIA, and FAI are well-established and well-known institutions, with services that make them competitive on a global scale. Given the small size of the region, international outreach is crucial for their further development. To sustain their growth, these institutions will need to continue enhancing their relevance to non-Nordic parties and strengthen their presence on the global arbitration market.