JAPAN P&I CLUB
日本船主責任相互保険組合

No.1312
2025年7月3日

JAPAN P&I NEWS

外航組合員各位

中国沿岸水域における船舶からの水質汚染物質の排出に関するガイドライン

題記の件に関し、2018年7月18日付Japan P&I News No.972「中国ー船舶からの水質汚染物質の排出基準改定」および2022年10月3日付Japan P&I News No.1190「中国沿岸における食品廃棄物処理に関する規制ーロスプリベンションのための提案」をご参照ください。

今般、中国のコレスポンデンツHuatai Insurance Agency & Consultant Service Ltd.から、中国沿岸水域における船舶からの各種水質汚染物質の排出に関する要件を整理したガイドラインを入手しましたので、添付のとおりご案内します。

以上

添付資料：Huatai Circular No.PNI(2025)05

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CIRCULAR

PNI [2025] 05

30 Jun 2025

Compliance Guidelines for Discharge of Water Pollutants from Ships in Chinese Coastal Waters

Dear Sir / Madam,

Following the issuance of Huatai Circulars PNI [2018]11 *"China Amended 'Discharge Standard for Water Pollutants from Ships'"* and PNI [2022]08 *"Regulations on Disposal of Food Wastes in Chinese Coasts and Loss*

Prevention Suggestions", our office has successively received compliance consultations from Shipowners and Clubs regarding the discharge of water pollutants from ships in Chinese coastal waters (particularly in the Bohai Sea). This Circular systematically outlines the discharge control requirements for water pollutants from ships in Chinese coastal waters, with an aim to address these concerns and provide practical compliance guidance for Clubs and their Members.

Discharge Control Requirements for Water Pollutants from Ships in Chinese Coastal Waters

The discharge control requirements for water pollutants from ships in Chinese coastal waters are primarily based on the National Standard GB3552-2018 (hereinafter referred to as the "Standard"). Issued in 2018 jointly by the former Ministry of Environmental Protection of the People's Republic of China and the General Administration of Quality Supervision, Inspection and Quarantine, the Standard is generally aligned with the international discharge standards for water pollutants specified in the “International Convention for the Prevention of Pollution from Ships” (MARPOL). Additionally, the Standard further imposes more stringent control requirements on certain pollutant discharge indicators.

The discharge control requirements for various types of water pollutants in Chinese coastal waters are summarized as follows:

Discharge Control Requirements for Oily Wastewater

Water Pollutants	Waters	Ship Type	Discharge Control Requirements
	Inland Waters	Ships constructed before January 1, 2021	From July 1, 2018, discharge after meeting the discharge requirement (oil content ≤ 15mg/L) while the ship is proceeding en route, or collect and discharge into reception facilities.

<table>
<tr><th>Water Pollutants</th><th>Waters</th><th colspan="2">Ship Type</th><th>Discharge Control Requirements</th></tr>
<tr><td rowspan="4">Oily Wastewater Originated from Machinery Spaces</td><td></td><td colspan="2">Ships constructed on or after January 1, 2021</td><td>Collect and discharge into reception facilities.</td></tr>
<tr><td rowspan="3">Coastal Waters</td><td colspan="2">Ships of 400 gross tonnage and above</td><td>From July 1, 2018, discharge after meeting the discharge requirement (oil content ≤ 15mg/L) while the ship is proceeding en route, or collect and discharge into reception facilities.</td></tr>
<tr><td rowspan="2">Ships Less than 400 gross tonnage</td><td>Non-fishing Ships</td><td>From July 1, 2018, discharge after meeting the discharge requirement (oil content ≤ 15mg/L) while the ship is proceeding en route, or collect and discharge into reception facilities.</td></tr>
<tr><td>Fishing Ships</td><td>(1) From July 1, 2018 to December 31, 2020, discharge after meeting the discharge requirement (oil content ≤ 15mg/L) while the ship is proceeding en route.
(2) From January 1, 2021, discharge after meeting the discharge standard (oil content ≤ 15mg/L) while the ship is proceeding en route, or collect and discharge into reception facilities.</td></tr>
<tr><td rowspan="2">Oily Wastewater Containing Oil Cargo Residues</td><td>Inland Waters</td><td colspan="2">All Tankers</td><td>From July 1, 2018, collect and discharge to reception facilities.</td></tr>
<tr><td>Coastal Waters</td><td colspan="2">Tankers of 150 gross tonnage and above</td><td>From July 1, 2018, collect and discharge into reception facilities or discharge when the ship is proceeding en route while meeting the following conditions:
(1) The tanker is more than 50 nm from the nearest land (the nearest baseline of the Chinese territorial sea);
(2) The instantaneous rate of discharge of oil content does not exceed 30 litres per nautical mile;
(3) The total quantity of oil discharged into the sea does not exceed 1/30,000 of the total quantity of the particular cargo of which the residue formed a part;
(4) The tanker has an oil discharge monitoring</td></tr>
</table>

Water Pollutants	Waters	Ship Type	Discharge Control Requirements
			and control system that is working properly.
		Tankers less than 150 gross tonnage	From July 1, 2018, collect and discharge into reception facilities.

Discharge Control Requirements for Sewage

<table>
<tr><th>Ship Type</th><th>Waters</th><th colspan="2">Discharge Control Requirements</th></tr>
<tr><td rowspan="5">From July 1, 2018, for ships of 400 GT and above, and ships under 400 GT approved to carry 15 or more persons.</td><td rowspan="4">In inland waters and sea areas within 3nm (inclusive) from the nearest land (the nearest baseline of the Chinese territorial sea)</td><td colspan="2">Stored in holding tanks and then discharged into reception facilities; or</td></tr>
<tr><td rowspan="3">Treated by the onboard treatment plant to meet the discharge criteria specified in the right column and discharged when the ship is en route.</td><td>For ships with sewage treatment plants Installed (including replaced) before January 1, 2012:
(1) 5-day biochemical oxygen demand (BOD_5)≤50mg/L;
(2) Suspended Solids (SS) ≤150mg/L;
(3) Number of Thermotolerant Coliform ≤ 2500/L.</td></tr>
<tr><td>For ships with sewage treatment plants Installed (including replaced) on and after January 1, 2012
(1) 5-day biochemical oxygen demand (BOD_5)≤25mg/L;
(2) Suspended Solids (SS) (mg/L) ≤ 35mg/L;
(3) Number of Thermotolerant Coliform ≤ 1000/L;
(4) Chemical Oxygen Demand (CODCr) ≤125mg/L;
(5) pH 6-8.5;
(6) Total Chlorine (residual Chlorine) < 0.5 mg/L.</td></tr>
<tr><td>For ships with sewage treatment plants installed (including replaced) on and after January 1, 2021, discharge in inland waters:
(1) 5-day biochemical oxygen demand (BOD_5)≤20mg/L;
(2) Suspended Solids (SS) (mg/L) ≤20mg/L;
(3) Number of Thermotolerant Coliform≤1000/L;
(4) Chemical Oxygen Demand (CODCr) ≤60mg/L;
(5) pH 6-8.5;
(6) Total Chlorine (residual Chlorine) < 0.5 mg/L;
(7) Total Nitrogen < 20 mg/L;
(8) Ammoniacal Nitrogen < 15mg/L;
(9) Total Phosphorus < 1.0mg/L.</td></tr>
<tr><td>Sea areas more than 3nm from the nearest land (the nearest</td><td colspan="2">Discharge is allowed subject to meeting both conditions below:
(1) The sewage shall be comminuted and disinfected using a system;
(2) The ship is en route and proceeding at no less than 4 knots, the rate of discharge shall not exceed the maximum allowable rate corresponding to the</td></tr>
</table>

	baseline of the Chinese territorial sea)	ship speed.
	Sea areas more than 12nm from the nearest land (the nearest baseline of the Chinese territorial sea)	Discharge is allowed when the ship is en route and proceeding at no less than 4 knots, and the rate of discharge shall not exceed the maximum allowable rate corresponding to the ship speed.

Note: It should be particularly noted that the Standard requires that in inland waters and sea areas within 3 nautical miles (inclusive) from the nearest land (the nearest baseline of the Chinese territorial sea), sewage treated by the onboard treatment plant can only be discharged while the ship is proceeding en route, whereas MARPOL Annex IV does not prescribe any navigation status requirement for sewage discharge through treatment plants.

Discharge Control Requirements for Wastewater Containing Noxious Liquid Substances

Water Pollutants	Waters	Discharge Control Requirements
Wastewater containing toxic substances, which is generated during the cargo tank cleaning process after the ship unloads according to the specified	Sea areas within 12nm from the nearest land (the nearest baseline of the Chinese territorial sea)	Collect and discharge into reception facilities.

procedures and carries out specified pre-washing, effective tank cleaning, or ventilation.	Sea areas more than 12nm (inclusive) from the nearest land (the nearest baseline of the Chinese territorial sea)	Discharge is allowed while meeting the following conditions: (1) The water depth is not less than 25 m; (2) The ship is proceeding en route at a speed of at least 7 knots in the case of self-propelled ships or at least 4 knots in the case of ships which are not self-propelled; (3) The discharge is made below the waterline through the underwater discharge outlet(s) not exceeding the maximum rate for which the underwater discharge outlet(s) is (are) designed (For ships constructed before 1 January 2007, the discharge into the sea of residues of substances in category Z or of those provisionally assessed as such may exempt from this requirement).

Discharge Control Requirements for Garbage

<table>
<tr><th>No.</th><th>Garbage Type</th><th colspan="2">Discharge Control Requirements</th></tr>
<tr><td>1</td><td>Plastics, cooking oil, domestic wastes, incinerator ashes, fishing gear, and E-waste.</td><td colspan="2">Collect and discharge into reception facilities.</td></tr>
<tr><td rowspan="3">2</td><td rowspan="3">Food Waste</td><td>Sea areas within 3nm (inclusive) from the nearest land (the nearest baseline of the Chinese territorial sea)</td><td>Collect and discharge into reception facilities.</td></tr>
<tr><td>Sea areas more than 3 nm from the nearest land (the nearest baseline of the Chinese territorial sea)</td><td>Disposal is allowed for food wastes that have been passed through a comminuter or grinder, and such comminuted or ground food waste is capable of passing through a screen with openings no greater than 25 mm.</td></tr>
<tr><td>Sea areas more than 12 nm from the nearest land (the nearest baseline of the</td><td>Discharge is permitted.</td></tr>
</table>

No.	Garbage Type	Discharge Control Requirements	
		Chinese territorial sea)	
3	Cargo Residues	Sea areas within 12nm (inclusive) from the nearest land (the nearest baseline of the Chinese territorial sea)	Collect and discharge into reception facilities.
		Sea areas more than 12 nm from the nearest land (the nearest baseline of the Chinese territorial sea)	Disposal is permitted if the cargo residues contain no substances that are harmful to the marine environment.
4	Animal carcasses	Sea areas within 12nm (inclusive) from the nearest land (the nearest baseline of the Chinese territorial sea)	Collect and discharge into reception facilities.
		Sea areas more than 12 nm from the nearest land (the nearest baseline of the Chinese territorial sea)	Discharge is permitted.
5	Cleaning agents and additives contained in the cargo hold, deck, and external surfaces wash water	Discharge is permitted if cleaning agents and additives are not harmful to the marine environment.	
6	Operational wastes other than Item 5 listed above	Collect and discharge into reception facilities.	

Note: 1. Disposing of garbage into inland waters is prohibited; 2. To comply with the Standard's explicit provision that "for the discharge control of mixed garbage comprising various categories of ship waste, the discharge control requirements for each category of ship waste contained therein shall be concurrently satisfied", in Chinese coastal waters, ships after unloading bulk solid cargo shall adhere to the discharge control requirements for cargo residues when discharging wash water generated from cargo hold cleaning operations (cleaning agents and additives are not harmful to the marine environment, if used). Since it is generally acknowledged that wash water and cargo residues will inevitably intermingle during the cleaning process, making effective physical separation of the two challenging.

Discharge Control Requirements for Other Substances

Ballast Water

Meet the D2 ballast water management standard and apply for discharge permission from the MSA in advance.

Wash Water from Open-Loop Exhaust Gas Cleaning Systems

Discharge of wash water from open-loop exhaust gas cleaning systems is prohibited within the Domestic Emission Control Areas for Atmospheric Pollution from Ships (DECAs).

Grey Water

Presently, China has not yet established mandatory regulatory requirements for the discharge of grey water. Nevertheless, for the consideration of marine environment protection, it is suggested that ships adhere to the following good practices while in port:

1. For those ships that cannot store grey water, they should minimize the production of grey water whilst in port. Examples of ways to minimize the production of grey water may include delaying laundry, scullery activities, and restricting the length of showers while in port, as well as using high-efficiency faucets and shower heads.

2. If grey water needs to be discharged, minimize the entry of kitchen grease into the grey water system, e.g., remove food and grease residues as much as possible before rinsing tableware.

3. Use phosphorus-free and low-toxic soaps and detergents, and prohibit the use of products containing heavy metals or bio-accumulative compounds.

4. If feasible, prioritize discharging grey water into port reception facilities.

Our Suggestions

Discharge Control Requirements for Water Pollutants in the Bohai Sea

The Bohai Sea (the sea area west of the line connecting Laotieshan Cape at the southern end of the Liaodong Peninsula and Penglai Cape at the northern end of the Shandong Peninsula) is the internal sea of China. Under normal circumstances, ships in this sea area are prohibited from discharging water pollutants except for the following:

1. Sewage treated by the onboard sewage treatment plant meets the discharge control requirements (discharge when the ship is proceeding en route);

2. Oily wastewater from machinery spaces treated by the oil-water separation

plant meets the discharge control requirements (discharge when the ship is proceeding en route);

3. Deck, and external surface washing water does not contain cleaning agents or additives harmful to the marine environment;

4. Grey water;

5. Ballast water meets the D2 treatment standard (obtain prior discharge permission from the MSA).

Discharge Control Requirements for Water Pollutants in the Sea Area Where the Territorial Sea Baseline Has Not Been Declared

Currently, the baselines of the Chinese territorial sea north of Shandong Province have not been officially announced. When ships intend to discharge water pollutants subject to minimum distance requirements from the nearest land in this sea area, the absence of a distinct territorial sea baseline as a geographical reference makes it challenging to determine an appropriate discharge location. Based on available information to date, no cases have been documented where ships were penalized for non-compliance with the discharge distance requirement in this region. Nevertheless, it is advisable for ships to adopt prudent measures to mitigate non-compliance risks. The following water pollutant management measures are provided for reference (listed in descending order of priority):

1. Discharge into the reception facilities

Discharging water pollutants into qualified pollutant reception ships or facilities is the most reliable solution to eliminate disputes over discharge distance.

2. Temporarily store on board for discharge in compliant sea areas

If delivery conditions are not available, water pollutants can be properly stored on board and disposed of as required after sailing to sea areas where clear territorial sea baselines are explicitly delimited.

3. Refer to the boundaries of DECAs

While ship air pollutant emission control areas (DECAs) are not applicable to water pollutant management, their coverage substantially overlaps with Chinese jurisdictional waters, where territorial sea baselines have been clearly defined. Ships may consider discharging water pollutants in sea areas outside DECAs, provided they comply with other applicable discharge requirements in the meantime.

4. Taking the actual geographical distance as a reference

Should the above measures prove unfeasible, the discharge location may be determined based on the actual distance from the ship to the nearest land (e.g., as measured via electronic nautical charts), provided that navigation tracks, discharge data, and other supporting documentation are properly recorded.

The aforementioned suggestions 1 to 3 represent priority recommended solutions, whereas suggestion 4 serves as an alternative measure that should be exercised with great caution and supported by complete operational records. Notably, these suggestions are intended to provide general compliance references for the industry. Specific operations must be comprehensively determined by referencing to ship types, pollutant characteristics, and real-time regulatory requirements，etc. When necessary, the local MSA should be consulted to confirm operation compliance.

Finally, we would like to express our sincere gratitude to Ms. Jia Rui from Tianjin MSA for her professional guidance in the preparation of this Circular.

Should you have any inquiries, please feel free to contact Huatai Beijing (pni.bj@huatai-serv.com) or our local branch offices.

Best regards,

CUI Jiyu

Head of Marine Team