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JAPAN P&I NEWS

外航組合員各位

中国－中国管轄海域内における Starlink サービスの使用について（外国籍船への罰金事例）

中国のコレスボンデンツ Oasis P&I Services Company Limited から、中国管轄海域内における低軌道（Low Earth Orbit: LEO）衛星通信 Starlink サービスの使用に関する規制要件と、実際に発生した罰則事例についての情報を入手しましたのでご案内します。

2025年12月、寧波海事局（Ningbo Maritime Safety Administration）は、Starlink 設備を使用していた外国籍船に対して調査を行いました。これは中国における同種の事案で初の摘発例となります。

中国領海内では、中国政府の承認を得ていない衛星通信サービスの利用や、国内ゲートウェイを経由しない通信は違法となり、高額な罰金（最大 50 万人民元以上になる可能性あり）や、船員の海技免状の停止、機器の没収などが科されるおそれがあります。

規則の詳細および推奨されるコンプライアンス対策（入域前の物理的な接続切断やログブックへの適切な記録等）につきましては、添付の Oasis P&I Services Company Limited のサーチュラーをご参照ください。

以上

添付資料： Oasis Circular No.2601



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Oasis Circular No.: 2601

Subject: Vessel fined for using Starlink service in Chinese waters

Recently, China MSA has intensified supervision over the use of Low Earth Orbit ("LEO") satellite communication equipment (e.g., Starlink) by vessels within Chinese jurisdictional waters. In December 2025, Ningbo MSA conducted investigation into a foreign vessel using Starlink equipment, marking the first case of its kind in China.

Key Chinese Legal and Regulatory Provisions

Under Chinese laws and regulations, the use of unauthorized satellite communication equipment or the failure to route communication data through Chinese domestic satellite gateway stations constitutes a violation. The legal basis is set out as follows:

- Article 24 of the Maritime Traffic Safety Law

Vessels within Chinese jurisdictional waters must route communications requiring shore-based relay through lawfully established domestic coast stations or satellite gateway stations.

- Article 28 of Regulations on the Administration of Direct Satellite Services for Terminal Devices

It is explicitly stipulated that the use of satellite communication services within Chinese territory requires that the satellite communication service provider obtain legal approval within China. Using services from providers not legally approved is considered unlawful.

- Article 54 of the Radio Administration Regulations

Radio stations installed on foreign vessels must comply with Chinese laws, regulations, and international treaties when used within Chinese territory.

Administrative Penalties

According to Article 101 of the Maritime Traffic Safety Law, a fine of not more than CNY30,000 shall be imposed on the relevant responsible personnel by maritime authorities;

if the circumstances are serious, a fine of not less than CNY30,000 but not more than CNY100,000 shall be imposed, and the competency certificate(s) of the responsible seafarer(s) shall be suspended for a period of one to three months.

According to Article 70 of the Radio Administration Regulations, where, in violation of these Regulations, radio frequencies are used without authorization or without a license, or radio stations (or sites) are established or used without authorization, the radio regulatory authority shall order corrections to be made, confiscate the equipment used for the illegal activities as well as any illegal gains, and may impose a concurrent fine of not more than CNY50,000. If the party refuses to make corrections, a concurrent fine of not less than CNY50,000 but not more than CNY200,000 shall be imposed. Where a radio station (or site) is established or used without authorization to engage in illegal activities such as fraud, which does not constitute a crime, a concurrent fine of not less than CNY200,000 but not more than CNY500,000 shall be imposed.

Recommendations

To mitigate compliance risks, vessels are advised to adopt the following measures:

1. Device Management

Completely power off and physically disconnect (e.g., unplug) unauthorized devices such as Starlink terminals before entering Chinese jurisdictional waters (including internal waters, territorial sea, and Exclusive Economic Zone).

While some MSA offices may focus on activities within the territorial sea (12 nautical miles), for comprehensive compliance, it is advisable to shut down equipment before entering the EEZ (200 nautical miles).

Clearly label installed satellite equipment to remind crew of usage restrictions in specific waters.

2. Documentation

Accurately record the time, location (coordinates), and action taken (e.g., "Starlink terminal powered off and physically disconnected") in the vessel's deck logbook.

3. Crew Training

Integrate Chinese regulations on satellite equipment usage into pre-voyage briefings to ensure that the crew understands the timing and procedures for shutting down equipment, are familiar with relevant Chinese legal requirements, and can clearly explain compliance measures during maritime inspections.

4. Emergency Preparedness

In the event of a MSA inspection, present logbook records to demonstrate compliance.

If a penalty notice is received, contact the local agent or correspondent or legal counsel to seek guidance.

We hope the above will be of assistance. If there is any query, please feel free to contact us at [**oasis@oasispandi.com**](mailto:oasis@oasispandi.com) at any time.

Best regards,

Oasis P&I Services Company Limited