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CIRCULAR

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Joint Special Campaign on Ship Pollution Prevention and Control Launched by the Four MSAs around the Bohai Sea (2026)

Dear Sir / Madam,

According to a notice published on the official website of Tianjin Maritime Safety Administration (Tianjin MSA) on June 5, 2026, the maritime authorities of Tianjin, Hebei, Liaoning, and Shandong have jointly launched a special campaign on ship pollution prevention and control in the Bohai Sea region (hereinafter referred to as the "Campaign"), with a duration of nearly five months. Members are hereby reminded to prepare for inspections in advance to guard against administrative penalties and detention risks.

I. Overview of the Campaign

During this Campaign, each MSA will, relying on the coordinated supervision mechanism

for ship pollution prevention and control in the Bohai Sea region, conduct joint inspections and share relevant information. The enforcement methods will combine boarding inspections, cross-regional inspections, unannounced spot checks, and remote supervision, utilizing technical means such as UAV patrols, maritime patrol vessels, shore-based monitoring, and on-site rapid fuel testing, to supervise ships in fulfilling their pollution prevention responsibilities in accordance with international conventions and Chinese laws and regulations.

II. Covered Ports

This Campaign covers the major ports and their surrounding ports within the Bohai Sea region, including Tianjin, Tangshan (Jingtang and Caofeidian port areas), Qinhuangdao, Huanghua, Jinzhou, Yingkou, Longkou, etc.

III. Inspection Items

Based on the information released, combined with our communication with the Tianjin MSA, as well as the established enforcement practices in ship pollution prevention and control in the Bohai Sea region, it is anticipated that this Campaign will focus on regulatory inspections covering the disposal and documentation of oily water, toxic and hazardous tank washing water, sewage and ship-generated garbage, air pollution prevention (covering emissions of nitrogen oxides, sulphur oxides, volatile organic compounds and fuel compliance, etc.), and the supervision of high-pollution-risk operations, among other aspects.

IV. Our Suggestions

To effectively address this special ship pollution prevention inspection, we advise ships bound for the Bohai Sea region to pay particular attention to the following key areas. It should be particularly noted that the content of this Circular is not exhaustive. Shipowners and operators are kindly requested to tailor additional measures to their specific trading patterns, equipment configurations, and operational profiles.

1. Disposal and Documentation of Ship-generated Pollutants

The management of ship-generated pollutants constitutes the primary focus of this Campaign. As stipulated in the MSA notice, maritime authorities will conduct joint inspections in coordination with port, ecological environment, and municipal administration

departments to strictly verify the disposal of ship-generated pollutants, including bilge water, sewage, and garbage. Any fraudulent practice, such as issuing disposal receipts without actual delivery, is strictly prohibited.

- Ship-generated pollutants, including engine room bilge water, sewage, domestic garbage, and tank wash water, if sent ashore for disposal, must be delivered to qualified reception facilities or ships for treatment, and ensure that the pollutants are actually delivered.

- Keep complete and traceable pollutant reception receipts, and ship transfer documents for inspection purposes.

- Should any ship-generated pollutants be discharged into the sea, such discharge must strictly comply with international conventions and relevant Chinese laws and regulations.

- Statutory record books, including but not limited to the Oil Record Book, Garbage Record Book, and Cargo Record Book, shall be completed in a standardized manner. Recorded entries must be mutually corroborated with the Deck Log, Engine Log, and port documents to ensure their authenticity, continuity, and completeness.

2. Shore Power Connection

- It is advisable for ships equipped with shore power receiving facilities (excluding tankers) planning to berth for more than three hours to verify through their agent in advance whether the intended berth is fitted with shore power facilities. Where such facilities are available, relevant technical parameters should be exchanged with the terminal operator before arrival to ensure a prompt and seamless shore power connection upon berthing.

- Records of the use of shore power shall be retained on board for a minimum of two years for inspection purposes. These records must include the berth name, vessel name, times of berthing and unberthing, shore power connection and disconnection times, and quantity of electricity consumption. In the event of any interruption or failure, the time of occurrence, the nature and cause of the fault, and the time when supply was resumed shall be duly documented.

- Regular inspections of shore power receiving facilities, with particular attention to

cables and associated connectors, shall be conducted to ensure that they are continuously maintained in good technical condition. Furthermore, crew training programs must be reinforced to eliminate functional failures and safety hazards arising from operational errors.

3. Ship Energy Efficiency and Carbon Intensity Management

Applicable ships shall:

- Implement energy efficiency improvement measures such as speed optimization and hull fouling management in accordance with Part I of the Ship Energy Efficiency Management Plan (SEEMP) and retain relevant records properly.

- Strictly implement Part II of the approved SEEMP (IMO Data Collection System) to accurately collect and report data on fuel consumption, voyage distance, and operation time.

- Ships subject to the Carbon Intensity Indicator (CII) requirements shall complete annual CII calculations and ratings in a timely manner. Ships rated D for three consecutive years or E in any single year shall formulate a corrective action plan reviewed and approved by a recognized organization in accordance with Part III of the SEEMP, and keep it on board for inspection.

4. Control of Ship Volatile Organic Compounds (VOCs)

- Ships carrying crude oil and high-volatile refined oil shall be fitted with VOC recovery systems approved by competent authorities. When using such systems, operations must be conducted strictly in accordance with the company's SMS, and accurate operational records must be maintained for inspection.

- Crude oil tankers shall carry an approved Volatile Organic Compound (VOC) Management Plan on board, detailing emission control requirements and mitigation measures during loading, voyage, discharging, and crude oil washing operations. Furthermore, crew training programs shall be reinforced to ensure proficiency in relevant operational procedures and control measures.

5. Marine Fuel Oil Management

- As stipulated in the MSA notice, MSA officers may use portable rapid testing equipment to conduct on-site sampling and screening of ship fuel. Fuel samples with abnormal initial test results shall be sent to designated third-party institutions for confirmatory re-testing. Ships found in violation of using non-compliant fuel oil will face severe penalties.

- A comprehensive fuel oil quality control system shall be established on board, covering document management, onboard sampling, and laboratory testing procedures. The crew shall diligently adhere to these procedures so as to preclude the receipt of non-compliant fuel oil during bunkering operations.

- Bunker delivery notes, quality certificates, and all associated documentation shall be retained on board for a minimum period of three years from the date of bunkering. Representative fuel samples shall be securely sealed, clearly labeled, and stored in a designated safe location until the corresponding fuel batch has been substantially consumed. Under no circumstances shall the retention period be less than twelve months from the date of delivery, and the samples shall be readily accessible for verification when required.

6. Approval and Supervision of High-pollution-risk Operations

- When carrying out high-pollution-risk operations, including bunkering, sludge disposal, tank cleaning, and the loading/discharging of pollution-hazardous cargo, the pre-operational reporting and approval system shall be strictly enforced. In the event of any change to the operation, the relevant information shall be promptly updated and re-approved. The Master shall ensure that the declared information aligns with the actual operation time, location, ship particulars, and documentary records.

- During high-pollution-risk operations, the requirements of the shipboard Safety Management System (SMS) must be strictly implemented. All critical operations shall be conducted in accordance with prescribed SMS procedures to prevent any pollution incident.

- Prior to entering port or conducting loading, discharging, or lightering operations outside the port, applicable ships shall enter into a formal Agreement for Ship Pollution Response with qualified ship pollution response organizations. The original executed agreement shall be maintained on board and be readily available for inspection by authorities.

7. Pollution Prevention Equipment and Statutory Documents

- The operational status of pollution prevention equipment, including oil-water separators, sewage treatment plants, and oil discharge monitoring and control systems, shall be verified to ensure they remain in good working order at all times. Any form of pipeline bypass, unauthorized shutdown of equipment, or continued operation of equipment with known defects is strictly prohibited.

- The quantity, expiry dates, and storage conditions of pollution prevention equipment and materials, such as oil booms, absorbent pads, portable emergency pumps, cleaning tools, and dispersants, shall be periodically verified to ensure they remain in a state of readiness for immediate use at all times.

- During high-pollution-risk operations, anti-pollution equipment shall be deployed in advance within the operational area and maintained in a state of readiness throughout the entire operation.

- Verify the validity of statutory certificates, including the International Oil Pollution Prevention (IOPP) Certificate, International Air Pollution Prevention (IAPP) Certificate, and International Sewage Pollution Prevention (ISPP) Certificate, and their conformity with the shipboard equipment.

- Ensure the accuracy, authenticity, and completeness of documents such as the Oil Record Book, Ozone Depleting Substances Record Book, Garbage Record Book, and Ship Energy Efficiency Management Plan.

8. Crew Training and On-site Response

- Shipowners and Managers shall ensure that all relevant crew members are thoroughly briefed on the specific requirements of this Campaign prior to the ship's entry into Bohai Sea waters. Whenever practicable, a pollution response emergency drill shall be conducted, supplemented by targeted training to enhance crew proficiency in operating pollution response equipment. This ensures that contingency plans, personnel, and equipment are maintained in a constant state of readiness for immediate deployment.

- The Master, Chief Officer, or designated responsible officer shall accompany MSA

officers throughout the inspection. They shall produce upon request all ship certificates, official documents, and relevant records, while maintaining a professional, courteous, and cooperative attitude at all times.

- When MSA officers conduct bunker fuel sampling on site, the Chief Engineer shall be present throughout the operation. The Chief Engineer shall jointly witness and verify the sampling and sealing process, confirm the integrity of the sample label and seal number, and endorse the records as required.

For any related questions, 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

Related Huatai Circulars

1. PNI[2018]07 - Administrative Penalty Imposed to Ships that Fail to Sign SPRO Agreement When Calling Chinese Ports

2. PNI[2018]16 - Chinese Ministry of Transport Issued New Requirement Regarding Emission Control Areas in Chinese Territorial Waters to be Effective from 01.01.2019

3. PNI[2019]01 - Prohibition of discharging wastewater generated by open-loop exhaust gas cleaning systems (scrubbers) in Inland River Emission Control Area, all ports within Coastal Emission Control Area and Bohai-rim Sea Area in China.

4. PNI[2022]08 - Regulations on Disposal of Food Wastes in Chinese Coasts and Loss Prevention Suggestions

5. PNI[2024]05 - Requirements for the Use of Shore Power in Chinese Ports

6. PNI[2025]04 - Official Release of the 2025 Revised Edition of the Administrative Measures for the Ship Pollution Response Agreement Regime

7. PNI[2025]05 - Compliance Guidelines for Discharge of Water Pollutants from Ships in Chinese Coastal Waters