

## The Facilitation Measures for "One-time Ship Position Reporting" Implemented in Major Waters of China



Ingostrakh's P&I Correspondent in China Messrs. Huatai Insurance Agency & Consultant Service Ltd., keeps us in loop of update concerning navigation updates in Chinese waters.

On October 21, 2024, the Maritime Safety Administration (MSA) of the People's Republic of China issued the "Announcement on Implementing the Facilitation Measures for 'One-time Ship Position Reporting' in Major Waters across the Country" (the "Announcement"), deciding to implement the "One-time Ship Position Reporting" facilitation measures in major waters of China starting from November 12, 2024.

## **Main Contents of the Announcement**

### **Major Waters for Implementing the "One-time Ship Position Reporting" Measures**

1. The Bohai Rim region: The Vessel Traffic Service (VTS) areas under the jurisdiction of Tianjin, Liaoning, Hebei, and Shandong MSA.
2. Yangtze River Delta and the Main stream of the Yangtze River region: VTS areas under the jurisdiction of Shanghai, Zhejiang, Fujian, Yangtze River, Jiangsu, and Lianyungang MSA.
3. Pearl River Delta region: VTS areas under the jurisdiction of Guangdong and Shenzhen MSA.
4. Qiongzhou Strait region: Qiongzhou Strait VTS area under the jurisdiction of Hainan MSA.
5. Beibu Gulf region: Beihai, Qinzhou, and Fangcheng VTS areas under the jurisdiction of Guangxi MSA.

### **Applicable Ships**

Ships with a length of 80 meters and above that accurately display the Automatic Identification System (AIS) information, excluding passenger ships and ships on trial voyages.

### **Reporting Contents**

The reporting contents required by the competent authority, such as the name, position of the ship, etc.

### **Reporting Methods**

1. After entering each region as described above, a ship shall submit a position report to the VTS center by means of very high frequency (VHF) telephony or other effective means when passing through the first VTS reporting line specified by the competent authority.

2. When a ship leaves her berth, she shall submit a dynamic report to the local or designated VTS center by VHF or other effective means.

3. Ships that have completed the above reports are not required to report when passing other VTS reporting lines in their respective regions.

## **Other Matters**

"Ship Position Reporting" refers to the reports made by ships when passing the VTS reporting lines. Ships that have submitted one-time ship position reports are not exempt from the obligation to keep listening watch on the VHF channels as prescribed by the competent authorities, nor are they exempt from the reporting obligation to apply for waterways, anchorages, berths, when passing through special areas such as bridges and when they are in emergency or under abnormal circumstances.

## **Comments and Suggestions**

The implementation of the "One-time Ship Position Report" facilitation measures has significantly simplified the reporting procedures after ships enter the VTS reporting area, effectively reduced the reporting burden on crew members, so that they can devote more time and energy to the safe navigation of ships. Therefore, the implementation of this measure will help reduce the navigation safety risks that associated with factors such as fatigue and distraction. Meanwhile, with the implementation of "One-time Ship Position Reporting" measure, VTS staff will obtain all the key information of ships when they pass the first reporting line within the region. By following this practice, VTS staff could allocate their time and energy saved from additional reports to other critical field, such as the strict supervision of key ships, key areas and the high-risk periods, which will significantly improve their supervision effectiveness and efficiency.

Taking into account the implementation of this new facilitation measure, Huatai suggests ships to ensure their onboard communication devices such as the AIS and VHF telephony are functioning properly, and verify the accuracy and completeness of the dynamic / static information that displayed on their AIS before entering the waters where the "One-time Ship Position Reporting" measures is applicable.

Additionally, in order to ensure that crew members comply with and effectively implement these measures, shipping companies are also suggested to actively fulfill their management responsibilities by reminding the relevant crew members onboard ships bound for Chinese ports to understand the "One-time Ship Position

Reporting" measures and familiarize themselves with the reporting requirements and relevant precautions well in advance.

Full text of the Circular is available via the [link](#).

## TURKIYE POLLUTION FINES 2025

**Ingosstrakh' s P&I Correspondent in Turkey Messrs. Kalimbassieris Maritime**, keep us in loop of update concerning the amendments to Turkish environmental legislation.

As stated previously in our annual Circulars regarding pollution fines, the fine amounts are updated each year based on the inflation adjustment rate. The Directorate of Revenue Administration under the Ministry of Treasury and Finance has announced the inflation adjustment rate in the Official Gazette dated 27 November 2024. The rate has been set at 43.93%, meaning that fines in 2025 will increase by 43.93% compared to the fine levels applied in 2024, effective from 1st January 2025.

The revised 2025 rates are outlined in the table below.

### A- ARTICLE 20 (i) (1) Petroleum and petroleum products including but not limited to crude oil, liquid fuel, greasy waste, oily mud, slop, sludge by tankers

GROSS TONNAGE	Rates valid from 01.01.2025
Up to 1000 (inclusive) GT	TRY per GT (Base) 4,583.90
1001-5000 (inclusive) GT	TRY per GT (Additional) 1,146,01
5001 and up	TRY per GT (Additional) 114.55

### B- ARTICLE 20 (i) (2) Dirty ballast discharged by tankers

GROSS TONNAGE	Rates valid from 01.01.2025
Up to 1000 (inclusive) GT	TRY per GT (Base) 835.15
1001-5000 (inclusive) GT	TRY per GT (Additional) 166.61
5001 and up	TRY per GT (Additional) 26.44

### C- ARTICLE 20 (i) (3) Vessels / other sea vehicles releasing dirty ballast and petroleum products

GROSS TONNAGE	Rates valid from 01.01.2025
Up to 1000 (inclusive) GT	TRY per GT (Base) 2,291.94
1001-5000 (inclusive) GT	TRY per GT (Additional) 458.40

5001 and up	TRY per GT (Additional) 114.55
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**D- ARTICLE 20 (i) (4) Vessels and other sea vehicles discharging/releasing solid waste garbage/ domestic wastewater/ sewage/ detergent water/ foam/ scrubber water or similar wash water, etc.**

GROSS TONNAGE	Rates valid from 01.01.2025
Up to 18 (inclusive) GT	TRY 25,419.48
18-50 (inclusive) GT	TRY 50,843.27
50-100 (inclusive) GT	TRY 101,686.55
100-150 (inclusive) GT	TRY 152,531.26
Up to 1000 (inclusive) GT	TRY (Base) 1,146.10
1001-5000 (inclusive) GT	TRY (Additional) 229.21
5001 and up	TRY (Additional) 26.44

\* According to the provisions of the Environment Code (Article 23), the repetition of the same act by the same vessel within the next three years after the service date of the first fine will result in doubling the fine amount for the next pollution event and tripling for the following ones.

\*\* If any hazardous waste or similar nature or of its substance is released / dumped to the sea, the fine to be imposed is 10 (ten) times of the announced tariffs under the category of "A" above.

\*\*\* If the vessel or the sea craft (offender) cleans the pollution caused by its own, by using her own means and efforts, the administrative fine shall be 1/3 of the total amount.

\*\*\*\* Payment of the fine within 30 days as of the service date provides an advantage of 25% discount over the total amount.

\*\*\*\*\* The above rates are tripled if the owner of the vessel, which caused pollution is a legal entity registered in Turkey.

\*\*\*\*\* The above rates will be doubled for the pollution incurred at Special Environment Protection Zones. The special zone covers the Marmara Region and Straits which also cover the Marmara Region and Straits (contains all ports and anchorage areas within Istanbul, Kocaeli, Yalova, Bursa, Balikesir, Canakkale, Tekirdag).

\*\*\*\*\* Gross tonnage limitation has been introduced for additional amount per GT applicable for vessels exceeding 5,000 GT under article 20 (i) (4). Accordingly, the following table would be used and for tankers, ships and other marine vehicles which are larger than GRT 100,000, an administrative fine shall be imposed on the basis of those for GRT 100,000.

## Statements and Sampling Process

When a pollution allegation arises, the vessel is detained by the Harbor Master, and the following procedure is initiated:

Coastguard personnel usually board the vessel to take crew statements, and if deemed necessary, will also collect samples from onboard the vessel. The Authorities may take samples from the polluted area (if possible) and from the open sea (clean area) during their inspection for comparison purposes. It is important to note that this procedure may vary depending on the specific case or region.

When samples are collected by the Authorities, they are sent to The Scientific and Technological Research Council of Turkey (TÜBİTAK) for analysis.

Once the analysis is complete and if presence of pollutant in samples is confirmed, the Authorities will then issue a fine.

## Payment and Objection Procedures

For the purpose of releasing the vessel from detention while the procedures, as explained above, are completed, the Authorities will request security from the vessel's interests in the form of Club Letter of Undertaking or Bank Guarantee issued by a Turkish bank.

In most cases, a Letter of Undertaking (LoU) from the vessel's P&I Club is usually acceptable. However, the LoU wording requested by the Turkish Authorities for pollution cases differs from the standard wording of a Club LoU. It is essentially an agreement to accept payment within 30 days after the fine is issued and to date, Authorities have not shown any sign of flexibility to accept amendments to this wording.

Once the Authorities formally issue a fine for the alleged pollution incident, it must be paid immediately, within 30 days. As outlined above, if the fine is paid within 30 days, a 25% discount will be applied.

Objections to fines can be filed with the Administrative Court within 30 days of receiving the fine notice. It should be noted that payment of the fine does not prejudice the Owner's right to appeal the fine within the given timeframe.

In this regard, in the event of an allegation of marine pollution, prompt appointment of P&I local correspondent is essential to ensure the efficient management of procedures with the Authorities from the outset of the matter for best possible protection of the vessel's interests.