Panama Maritime Authority
General Directorate of Merchant Marine
Control and Compliance Department

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V.04

SAFETY RECOMMENDATIONS FOR VESSELS NAVIGATING IN CHINA'S COASTAL WATERS DURING THE FISHING SEASON

No: **MMN-15/2026**

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1. The purpose of this Merchant Marine Notice is to inform shipowners, operators, Masters and officers of vessels flying the Panamanian flag of the safety recommendations issued by the Maritime Safety Administration of the People's Republic of China (China MSA) for vessels navigating in China's coastal waters, particularly in areas with dense fishing vessel activity. The complete text of the recommendations is available in the Annex entitled "Safety Recommendations for Vessels Navigating in China´s Coastal Waters".

2. In view of the increased interaction between merchant vessels and fishing vessels in these waters, all concerned parties are urged to take the following measures to strengthen navigational safety, prevent collisions and ensure an appropriate response in the event of an emergency.

3. Strengthen Shore-Based Monitoring and Guidance.

3.1. Shore-based monitoring and pre-voyage risk assessment.

3.1.1. Shipowners and operators are advised to:

- Implement 24-hour shore-based watchkeeping, as appropriate;
- Strengthen dynamic monitoring of vessels navigating in China's coastal waters;
- Promptly receive and disseminate early-warning information issued by competent authorities concerning:
    - Waters with dense fishing vessel activity;
    - High-risk waters; and
    - Areas with concentrated entry or departure of fishing vessels;
- Ensure that vessels conduct thorough pre-voyage risk assessments before navigating in affected areas;
- Pay particular attention to the verification of:
    - Voyage plans;
    - Collision-prevention measures; and
    - Watchkeeping arrangements in fishing areas.

3.2. Voyage planning

3.2.1. When developing voyage plans for navigation in China's coastal waters, full reference should be made, as applicable, to relevant documents issued by the competent Chinese authorities, including:

- The Guidelines for Coastal Public Shipping Routes;
- The Notice of the Maritime Safety Administration of the People's Republic of China on Promulgating High-risk Warning Zones for Collisions between Merchant Ships and Fishing Vessels in Coastal Waters of China; and
- The Guidelines for the Prevention of Collisions between Merchant Ships and Fishing Vessels in Coastal Waters of China.

3.2.2. Vessels and companies should use the above information to establish reasonable routes and specify appropriate collision-prevention measures.

4. Enhance Navigation Safety.

4.1. Voyage planning and watch handover.

4.1.1. Vessels navigating along the coast of China should formulate voyage plans in a proper and systematic manner.

4.1.2. As far as practicable:

- Planned routes should keep clear of areas of concentrated fishing activity;
- Vessels should navigate along recommended routes whenever possible;
- Particular attention should be given to areas known to have a high concentration of fishing vessels; and
- Appropriate collision-prevention measures should be established before entering such areas.

4.1.3. During navigation watch handover, complete information concerning the following shall be communicated to the relieving watchkeeper:

- Movements of surrounding merchant vessels;
- Movements of fishing vessels;
- Fishing operations and fishing gear in the vicinity; and
- All other identified navigational safety hazards.

4.1.4. Watch handover should only be completed after any collision-avoidance manoeuvres have been concluded and the vessels involved have passed and cleared each other.

4.2. Bridge watchkeeping and navigation safety meeting.

4.2.1. Before entering areas of dense fishing vessel activity in China's coastal waters, a navigation safety meeting should be conducted to clarify the navigational requirements and responsibilities of the bridge team.

4.2.2. When navigating in waters with dense fishing vessel activity:

- Bridge watchkeeping manpower should be strengthened;
- There should be at least two watchkeeping officers on the bridge;
- The Master should take command whenever necessary; and
- The bridge team should maintain an enhanced lookout and continuously monitor the surrounding traffic.

4.2.3. When navigating in fishing areas at night, the Master should issue night orders specifying the requirements for safe navigation, watchkeeping and collision avoidance.

4.3. Inspection and testing of navigational and safety equipment.

4.3.1. Before entering fishing areas, vessels should inspect and test the proper operation of all relevant navigational, communication, propulsion and steering equipment.

4.3.2. Particular attention should be given to:

- Radar;
- Electronic Chart Display and Information System (ECDIS);
- Automatic Identification System (AIS);
- Voyage Data Recorder (VDR);
- Very High Frequency (VHF) radio;
- Emergency power supply;
- Navigation lights;
- Daylight signalling lights;
- Sound signalling equipment; and
- Other equipment necessary for safe navigation and collision avoidance.

4.3.3. The vessel should also verify the proper working condition of the "four engines and one boiler", as applicable to the vessel's configuration, and the main engine should be maintained ready for immediate use when required.

4.3.4. The following steering arrangements should be inspected and tested:

- Manual steering – follow-up;
- Manual steering – non-follow-up;
- Automatic steering; and

- Emergency steering.

4.3.5. These tests should ensure that the steering system can function properly and respond effectively during an emergency collision-avoidance manoeuvre.

4.4. Collision avoidance with fishing vessels

4.4.1. When taking measures to avoid collision with fishing vessels, and provided that the safety of the own vessel is maintained, Masters and officers should exercise good seamanship and take early and positive action to keep clear of fishing vessels and prevent the development of close-quarters situations.

4.4.2. The minimum CPA should be maintained at not less than 1 nautical mile, with 0.5 nautical mile as far as practicable in areas of dense fishing activity, taking into account the prevailing circumstances and the safety of navigation.

4.4.3. For early communication and warning, vessels may use, as appropriate:

- VHF Channel 16;
- Ship's whistle; and
- Navigation and signalling lights.

4.4.4. All such communications and manoeuvres shall be conducted in accordance with the applicable COLREGs and good seamanship.

4.5. Passing fishing vessels and fishing gear.

4.5.1. When giving way to fishing vessels engaged in fishing operations, vessels should maintain a sufficient safe distance from both the fishing vessel and its fishing nets or other fishing gear.

4.5.2. Particular attention should be given to the following:

- When passing a trawler, maintain a distance of not less than 1 nautical mile from its stern;
- Crossing between two trawlers is prohibited;
- When passing fishing vessels engaged in seining operations, maintain a safe distance to windward and upstream of the vessel, as appropriate; and
- Maintain sufficient clearance from fishing nets and other fishing gear to avoid entanglement or collision.

5. Emergency Response and Rescue.

5.1. Close-quarters situations.

5.1.1. In the event that a close-quarters situation develops with a fishing vessel, decisive and appropriate evasive action should be taken without delay.

5.1.2. Depending on the circumstances and while maintaining the safety of the own vessel, such actions may include:

- Slowing down;
- Stopping;
- Reversing propulsion; and
- Altering course.

5.1.3. Particular attention should be given to avoiding a bow-on collision with the side of a fishing vessel and to minimizing the consequences of a potential collision.

5.1.4. The Master should take command whenever necessary and ensure that the bridge team responds promptly and effectively.

5.2. Collision and rescue.

5.2.1. In the event of a collision, the rescue and preservation of human life shall be given priority.

5.2.2. The vessel shall adopt all possible measures, consistent with the safety of the vessel and persons on board, to rescue persons in distress.

5.2.3. The nearest competent maritime administration should be notified immediately through all effective means.

5.2.4. The report should include, as available:

- Location of the incident;
- Name of the vessel in distress;
- Number and details of casualties;
- Extent of ship damage;
- Weather conditions;
- Sea conditions; and
- Rescue or assistance requirements.

5.2.5. At the same time, surrounding vessels should be notified and their assistance requested when necessary to support rescue operations.

6. Other Important Navigational Notices.

6.1. Fishing-net AIS locators.

6.1.1. Fishing vessels engaged in drift-netting, stow-netting and cage fishing may use fishing-net position AIS locators to indicate the location of their fishing nets.

6.1.2. Such fishing-net AIS locators may appear as triangular symbols on ECDIS.

6.1.3. These indications may affect the watchkeeper's interpretation of shipborne AIS, ECDIS and radar information. Bridge teams shall therefore exercise particular attention when identifying and interpreting such information and shall distinguish fishing-net position indications from conventional shipborne AIS targets.

6.1.4. The presence or absence of an AIS indication shall not relieve the bridge team of the obligation to maintain an effective visual, auditory and radar lookout.

6.2. Fishing vessels with limited visibility or communications.

6.2.1. Fishing vessels engaged in fishing operations may fail to exhibit the appropriate lights and shapes required by applicable regulations.

6.2.2. Masters and officers should therefore exercise particular caution around:

- Low-speed fishing vessels;
- Fishing vessels operating at anchor;
- Fishing vessels adrift;
- Fishing vessels with inadequate watchkeeping arrangements;
- Fishing vessels with VHF switched off or not being monitored; and
- Fishing vessels with AIS switched off or not transmitting.

6.2.3. Some wooden fishing vessels may be difficult to detect by radar due to their material and construction.

6.2.4. Enhanced lookout and the effective use of all available navigational equipment are therefore essential.

6.3. Sudden manoeuvres by fishing vessels.

6.3.1. Fishing vessels may suddenly alter course or increase speed in order to protect, recover or otherwise manage their fishing nets.

6.3.2. Masters and deck officers shall therefore maintain an enhanced lookout and continuously assess the movements and intentions of fishing vessels operating in the vicinity.

6.3.3. Particular caution should be exercised when the behaviour of a fishing vessel appears inconsistent with its previous course, speed or expected manoeuvring pattern.

6.4. VHF communications and language barriers.

6.4.1. Foreign ships communicating with fishing vessels by VHF in China's coastal waters should fully consider the possibility of language barriers.

6.4.2. VHF communications should therefore be clear, concise and unambiguous. Where effective communication cannot be established, vessels should not rely solely on VHF communication and should continue to assess the navigational situation using visual observation, radar, AIS, ECDIS and other available means.

6.4.3. Appropriate sound and light signals and early, clear manoeuvring should be used in accordance with the COLREGs and good seamanship.

7. Compliance.

7.1. Shipowners, operators, Masters and deck officers of vessels flying the Panamanian flag are urged to review and implement the safety recommendations contained in this Merchant Marine Notice when navigating in China's coastal waters, particularly in areas with dense fishing vessel activity.

7.2. Companies should ensure that these recommendations are appropriately incorporated into voyage planning, risk assessments, bridge procedures and the vessel's Safety Management System (SMS), as applicable.

7.3. Masters shall ensure that the bridge team is fully informed of the navigational risks before entering fishing areas and that all necessary precautions are taken throughout the voyage.

7.4. All vessels are reminded to comply strictly with applicable international regulations, including the International Regulations for Preventing Collisions at Sea (COLREGs) and the applicable STCW watchkeeping requirements, together with relevant requirements and navigational information issued by the competent maritime authorities of the People's Republic of China.

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Inquiries concerning the subject of this Merchant Marine Notice or any other request should be forward to:

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