

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

Ingosstrakh's P&I Correspondent in China Messrs. Huatai Insurance Agency & Consultant Service Ltd., keeps us in loop of the "Compliance Guidelines for Discharge of Water Pollutants from Ships in Chinese Coastal Water".

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. Some of the requirements are listed below.

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.

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.

The full text of the circular which is available via the [link](#).