

## Collision Risks between Merchant Vessels and Fishing Vessels in China's Coastal Waters: Analysis and Prevention Recommendations.

Ingosstrakh's P&I Correspondent in China Messrs. Huatai Insurance Agency & Consultant Service Ltd. provides us with recommendations on prevention on collision risks between Merchant Vessels and Fishing Vessels in China's Coastal Waters.

### **Geographic Distribution of Collision Accidents**

High-risk areas for merchant vessel-fishing vessel collisions are mainly concentrated in the following water types:

- Areas where customary routes of merchant vessels overlap with fishing grounds.
- Port anchorages and approach/departure channels.
- Waters with concentrated fishing activities during fishing seasons.
- Inshore waters with complex ocean currents and tides.

### **Analysis of Causes of Collision Accidents between Merchant Vessels and Fishing Vessels in China's Coastal Waters**

Investigation and analysis indicate that in most cases, both merchant and fishing vessels bear varying degrees of responsibility for the occurrence of such accidents. There are several factors that cause the accident and may involve aspects such as vessel manoeuvre, safety awareness, environmental backgrounds, and equipment that was operated on both sides.

#### **1. Merchant Vessel Aspects**

##### **1.1 Improper and Inadequate Look-out**

Some officers on watch (OOW) fail to properly perform look-out duties, e.g., over-relying on navigation equipment, like Radar, ECDIS, AIS, whilst neglecting the importance of visual look-out. Furthermore, in nighttime or restricted visibility conditions, the bridge may fail to maintain sufficient lookout personnel as appropriate to the prevailing

circumstances and conditions, resulting in a failure to detect fishing vessels at an early stage.

### 1.2 Insufficient Risk Anticipation

The actual density of fishing vessels during specific periods in China's coastal waters often exceeds the OOW's expectations of the traffic environment. This scenario often causes OOWs to fail to develop adequate response plans to address potential risks and the dynamic changes in the navigational environment, including:

- Failure to plan routes in advance to avoid dense fishing areas.
- Failure to prepare the vessel in all aspects for immediate maneuvering.
- Failure to promptly call the master to the bridge for supervision and support when circumstances so demanded.

### 1.3 Inappropriate Collision Avoidance Maneuvers

- Failing to take collision avoidance actions in ample time to keep well clear of fishing vessels in accordance with the International Regulations for Preventing Collisions at Sea (hereafter referred to as "COLREGS"). Accident investigations have shown that some OOWs tend to take action only when approaching fishing vessels at close range. This may leave inadequate time for collision avoidance decision-making or even lead to hasty judgments, resulting in unsatisfactory collision avoidance outcomes.
- The available manoeuvring space for merchant vessels is extremely limited upon entering waters with concentrated fishing vessels, which makes it difficult for the merchant vessels to execute effective collision avoidance actions (e.g., substantial course alterations and/or speed adjustments) as mandated by COLREGS. Even if such measures are taken with utmost endeavor, the merchant vessels may still find it is rather difficult for them to maintain a safe distance from fishing vessels (and their extended fishing gear). Additionally, it must be noted that the high density of fishing vessels significantly narrows the margin of error for merchant vessels' emergency actions, which in turn escalates the collision risk.

### 1.4 Navigation Equipment Issues

- Due to their smaller size and limited radar cross-section, fishing vessels can be difficult for merchant ships to detect effectively on radar, particularly in rough sea conditions. Furthermore, traditional merchant vessel radar also has a weak ability to distinguish net signals from sea clutter. As a result, it is not uncommon for fishing

vessels (and their nets) to be visually detected only when they are in close proximity to the merchant vessel.

- AIS information can be overlaid on radar and ECDIS, which may lead OOWs to over-rely on AIS data while neglecting the key operation of radar plotting. If a fishing vessel's AIS transmits incorrect or inaccurate data due to malfunctions, signal interference, or other factors, the merchant vessel is highly likely to make inappropriate collision avoidance decisions based on such data.
- Some fishing vessels deploy large quantities of fishing gear fitted with AIS beacons at sea. Excessive AIS signals from these gears can flood the radar screen, significantly impairing the merchant vessel OOW's ability to identify vessels with collision risks and thereby creating a major challenge to navigational safety.

## **2. Fishing Vessel Aspects**

### **2.1 Failure to Maintain Proper Look-out**

Due to the mindset of prioritizing production over safety among some fishing vessels, their bridge watchkeepers, who ought to be maintaining a proper watch on the bridge, often take part directly in fishing operations on deck, leaving the bridge unmanned.

### **2.2 Weak Safety Awareness**

- Fishing in waters such as merchant vessels' customary routes, anchorages, inbound/outbound port channels, and improper activities like crossing channels will significantly increase the risks of collision.
- Under the Influence of local customs, some fishing vessels tend to cross the bow of merchant vessels at close range, with the misconception that merchant vessels will invariably give way to them.
- To protect their gear from approaching merchant ships, fishing vessels may make sudden, unpredictable manoeuvres, significantly increasing collision risk.
- Fail to display lights and shapes in accordance with COLREGS, preventing merchant vessels from accurately determining the type and movement of the fishing vessels.

### **2.3 Inadequate Navigation Skills**

- Some crews on fishing vessels lack a thorough understanding of COLREGS and rely heavily on personal experience when navigating. They may fail to take

appropriate actions in case of an emergency, such as when a close-quarters situation forms.

- Actions to avoid collision are not taken in ample time, as the fishing vessel crews have insufficient knowledge of the navigation characteristics (such as sluggish turning response) of merchant vessels.

## 2.4 Communication & Navigation Equipment Issues and Associated Risks

Most fishing vessels are fitted with limited communication and navigation equipment, and some crews fail to operate this equipment properly. An example in this regard is that some fishing vessels shut down their generators when at anchor to save bunkers, and therefore, the AIS may be turned off due to insufficient power supply. This may make it difficult for merchant vessels to detect fishing vessels in a timely manner, particularly during nighttime or under restricted visibility conditions. Additionally, some fishing vessels fail to maintain a listening watch on the VHF, resulting in poor communication between merchant and fishing vessels and triggering incidents.

## 3. Other Contributing Factors

### 3.1 Environmental Factors

- Crew members' judgment and reaction capabilities are adversely impacted by seasonal severe weather such as typhoons, cold waves, and heavy fogs etc.
- Following the lifting of the summer fishing ban, a large number of fishing vessels sail out to sea. This results in an abrupt increase in maritime traffic density and leads to the creation of complex encounter situations between merchant vessels and fishing vessels.

### 3.2 Nighttime Impacts

- Intense operational lights on fishing vessels may prevent merchant vessel OOWs from detecting approaching fishing vessels in a timely manner, and may also significantly impair their ability to assess the risk of collisions.
- Due to circadian rhythms, night watchkeeping personnel tend to experience fatigue, which diminishes their watchkeeping concentration and emergency response capabilities.

### 3.3 Communication

In some cases, language barriers (e.g., differences in languages, dialects, and terminology comprehension) between merchant and fishing vessel crews may hinder effective communication and prevent the exchange of collision avoidance intentions.

### **Huatai's Suggestions**

1. The Guideline for the Prevention of Collisions between Merchant Vessels and Fishing Vessels in Coastal Waters of China (hereafter referred to as the "Guideline", (attached to the original circular) issued by the Maritime Safety Administration of the People's Republic of China (China MSA) has provides comprehensive safety operation standards and risk prevention guidelines for merchant vessels navigating in China's coastal waters. It is recommended that bridge teams familiarize themselves with the Guideline and adopt safe navigation practices contained therein when navigating in China's coastal waters.

2. In 2023, China MSA identified 38 high-risk areas for merchant-fishing vessel collisions in China's coastal waters (e.g., Bohai Bay, waters surrounding the Zhoushan Fishing Ground, and the Pearl River Estuary, attached to the original circular). Before entering these waters, merchant vessels are advised to familiarize themselves with the geographical distribution of these areas and plot those affecting their intended routes on Charts. Where conditions permit, detouring high-risk areas is a relatively prudent strategy. If navigating through such areas is unavoidable, it is imperative to maintain enhanced vigilance and navigate with caution.

3. In order to align with China MSA's requirements for the promotion, dissemination, and application of the two aforementioned documents, some regional MSAs may require ship agents to distribute the said documents to the vessels they represent and secure a signed acknowledgment from the masters (see Attachment 3 to the original circular) as proof of receipt of the documents.

4. Prioritize the adoption of public routes published by China MSA when planning routes along China's coastal waters.

5. Before entering China's coastal waters, ensure that:

- OOWs are fully aware of the vessel's maneuvering characteristics (e.g., turning circles, crash stop distance, etc.) and other key parameters that significantly impact navigation safety (e.g., bridge blind sectors).

- Key equipment, such as steering systems, signage appliances (whistles, navigation lights/shapes, daylight signal lamps), has undergone functional tests and is in good working order.

6. When approaching waters with dense fishing activities, prepare the engine and engage manual steering to facilitate immediate maneuvering. Meanwhile, adopt a safe speed to allow adequate time for a full assessment of the situation and collision risks.

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

### **China Suspends Imposition of Special Port Dues on U.S.-Linked Vessels for One Year**

Ingosstrakh' s P&I Correspondent in China Messrs. Oasis P&I Services Company Limited informs us that on November 10, 2025, Ministry of Transport of China released announcement on the Suspension of Special Port Dues for U.S. - Linked Vessels for one year, starting from November 10, 2025.

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