



CHINA RE

华泰保险经纪有限公司

HUATAI INSURANCE AGENCY & CONSULTANT SERVICE LTD.

Circular No.:1808

Date: 28/04/2018

Dear Sir/Madam

Subject: Tianjin Municipal Government Enhances Supervision and Control on Ship Pollution in Tianjin port as from 01.05.2018

“Provisions on Prevention and Control of Ship Pollution in Tianjin Port” (“Provision” hereinafter) has been promulgated by Tianjin Municipal Government on 01.03.2018 which shall come into force from 01.05.2018. This Provision sets several rules for ships, terminals and other relevant entities when navigating or operating within Tianjin port in order to prevent environmental pollution.

The applicable area of this Provisions is the maritime environment of Tianjin port (“Tianjin port” hereinafter) as is described in General Plan of Tianjin Port 2010, including water areas (refers to BA Charts) and its atmosphere above.

In order to advise our clients on the special requirements provided in this provision, we hereby summarized as below together with our preliminary comments based on our best knowledge and practice experience for your reference.

1. Using incinerators are prohibited within Tianjin port. Rectification and penalty from RMB3,000 to RMB30,000 shall be imposed by maritime administration authorities in violation of said requirement.

Our comments:

(1) Garbage Record Book should be properly recorded.
(2) As far as we know, incinerators and other pollutant equipments are not allowed to be used within Bohai sea areas.

2. Ships that enter Tianjin port for navigating, berthing, anchoring or operating for more than 30 days, or ships that enter dock yards within Tianjin port for reparation purpose are required to seal its pollutant

discharge equipment. In violation of above, maritime administration authorities shall order the ship to make rectification and impose a fine from RMB2,000 to RMB20,000. Ships should notify MSA in advance before unsealing the equipment. In case of emergent circumstances that ships' safety, life and property are threatened, the pollutant discharge equipment can be unsealed. The ship should report the unsealing action to local MSA as early as possible and record the said situation in engine log book properly.

Our comments:

(1) The sealing period of pollutant discharge equipment starts from the 31st day of ship's free floating (navigating, mooring, anchoring or operating) within Tianjin port until the date of ship's departure.

(2) The said 30-day period is calculated cumulatively including the period of ship's docking.

(3) The pollutant discharge equipment needs to be sealed including but not limited to the oily mixture discharging valves in engine room, whereas the class approved sewage treatment plant is not within the scope.

(4) In view that local MSA shall conduct supervision or inspection for unsealing operation, the following points should be noticed:

i) The seal shall be in good order in order to ensure the equipment is unable to be opened and operated.

ii) A notice with description that "by Order of the Master, it was sealed on dd-mm-yyyy. This equipment is prohibited to unseal / open / operate without Masters' further Order. Dated dd-mm-yyyy" shall be posted on or near the said equipment.

iii) Ships are recommended to take photos which can prove the date and condition of sealing in case of local MSA's onboard inspection.

iv) A proper record for sealing and unsealing in engine log book and/or other official books is also recommended in case of local MSA's onboard inspection.

3. Sealing or other protective measures shall be taken by the ships that carry, load or unload dust cargo or cargo that might diffuse toxic and harmful gas in order to prevent causing atmospheric pollution. Recycling of toxic and harmful gas should be conducted by ship side when carrying or operating cargo with hazardous pollutants. Rectification and a fine from RMB3,000 to RMB30,000 shall be ordered by maritime administration authorities for breach of the requirements.

Our comments:

1) While a general cargo ship, bulk carrier, oil tank, gas carrier, etc. is in

navigation, her hatch covers or cargo valves should be closed and kept in weather-tight condition.

2) When conducting cargo operation at berth, the party responsible for cargo operations is also responsible for conducting protective measures. Ship side shall ensure that all pollution prevention equipments onboard are available at any time.

3) Terminal or stevedore company also has their responsibilities for pollution prevention during cargo operation as per this Provision.

4) The said measures not only apply to international navigation ships, but also apply to domestic trading ships irrespective of size, type or kind of domestic cargo transportation.

(5) For the sake of good order, the operation of hatch covers or cargo valves should be recorded in gangway record book, cargo operation book or other official books properly.

4. Cleaning operation should be conducted in advance before deck washing. Under any of the following circumstances, ships are not allowed to wash deck within Tianjin port: deck is contaminated with pollutants; ship is staying or navigating in special protection zones including marine nature reserves, marine special protection areas, agricultural and fishing areas, salt field conservation areas and downstream water areas of the Haihe River.

Our comments:

(1) Deck washing in other areas of Baohai Sea is also prohibited as the waste water is defined as wet garbage.

(2) So far as we know, the special protection zones are mainly distributed along the coast line of Tianjin Administrative Area which is not within the regular routes of international navigation ships. For more details, please refers to BA charts and Guide to Port Entry on board if any.

(3) Ships are suggested to collect cargo residues or other substances on deck or inside cargo holds properly to avoid them falling into Tianjin port through rainwater or deck washing. If washing operation is unavoidable, the waste water and relevant residues should be kept or disposed properly.

5. If ship's pollutants are received by the receiving entities, a reception agreement shall be signed in advance to clarify the responsibility in respect of safety and pollution prevention.

6.No special requirement of ships' construction, equipment, apparatus and certificate is stipulated in this Provision.

Given the above, owners are recommended to take appropriate measures when entering Tianjin port as from 01 May 2018 to ensure satisfaction of relevant requirements and to avoid any delay or penalty to the ship.

Hope the above is of assistance. Should you have any query/instruction, please feel free to contact our Tianjin office at tianjin@huatai-serv.com.

Best regards

Handwritten signature in Chinese characters: 于利民

Yu Limin
President