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CIRCULAR

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Transit of the Qiongzhou Strait: Mandatory Requirements, Navigational Risks and Loss Prevention Recommendations

The Qiongzhou Strait lies between Hainan Island and the Leizhou Peninsula. It ranks among China's waters with the highest vessel traffic density, featuring complex traffic flows and stringent maritime supervision. Given these challenges, safe and compliant transit through the Strait is a practical issue widely concerned by Shipowners. To address this, Huatai Marine held discussions with competent officers of the Qiongzhou Strait Vessel Traffic Service Centre (VTS Center). This Circular reflects the outcomes of those discussions and compiles the mandatory regulatory requirements and practical guidance for vessels transiting the Qiongzhou Strait, with the object of effectively reducing the likelihood of navigational incidents and mitigating compliance risks.

1. Ship's Routing System and Mandatory Reporting Procedures

A Ship’s Routing System consisting of separation zones, boundary lines, traffic lanes, precautionary areas, areas to be avoided, recommended routes, roundabouts and inshore traffic zones is established within the Qiongzhou Strait. Vessels navigating in these waters must strictly comply with all provisions of the COLREGs, particularly Rule 10 concerning traffic separation schemes. In addition, the competent authority has implemented a Ship Reporting System for the Qiongzhou Strait. For full details on the routing and reporting systems, please refer to our Circular PNI [2022] 03.

In addition to the above mandatory requirements, Masters should be aware that aids to navigation in the Qiongzhou Strait may be temporarily relocated, replaced, or withdrawn due to dredging or construction works. They should consult the Notices to Mariners and Navigational Warnings issued by the maritime authority, maintain a listening watch on safety information broadcast by the VTS Centre, and exercise caution when navigating.

2. Speed Control

Foreign-flagged vessels transiting the Strait should keep their speed at or below 10 knots unless there is a legitimate reason to do otherwise. Masters should, however, pay close attention to the risks associated with low-speed navigation, in particular reduced rudder effectiveness, which is more pronounced in strong following-current conditions.

3. Draft Restrictions

The competent authority has not imposed a uniform draft limit for transiting vessels. Vessels should therefore calculate their Under Keel Clearance (UKC) accurately based on their actual draught, and carefully assess the feasibility of transit with reference to the company's UKC policy.

It should also be noted that foreign-flagged vessels transiting the Strait are required to use the Central Channel. Previously, a shallow spot of 15.8 meters existed between Buoys No.7 and No.9, presenting a navigational hazard. In practice, the VTS Centre therefore required vessels with a maximum draught exceeding 13.5 meters to submit a declaration through their agent before transit, confirming that the vessel is aware of the shallow spot and has formulated a detailed passage plan to manage the risk in the shallow-water area.

On 26 August 2026, the Hainan Maritime Safety Administration issued a notice confirming that the dredging works at the shallow spot had been completed. The post-dredge channel depth is 20.2 meters, meeting the requirements for two-way, full-tide transit by fully laden 200,000 DWT container vessels. The former navigational hazard has therefore been removed. However, our communication with the VTS Centre indicates that the declaration requirement remains in force. Given the possibility of future adjustment, vessels are advised to verify the latest declaration requirements with the VTS Centre through their agent prior to each transit.

4. Radar Operation within the Strait

The *Rules for the Control of Non-Military Vessels Passing Through the Qiongzhou Strait*, promulgated by the State Council of the People's Republic of China in 1964, provides that foreign-flagged vessels shall not use Radar while navigating within the Strait. However, in view of the current traffic density and collision-avoidance needs, the VTS Centre has not raised objections to merchant vessels using Radar for normal navigational purposes. That said, as the 1964 Rules remain in effect, it is recommended from loss-prevention perspectives that foreign-flagged vessels give prior notice to the VTS Centre before using Radar within the Strait, so as to avoid potential misunderstanding and preserve an auditable record.

5. Navigational Risks

Heavy traffic prevails within the precautionary areas of the routing system and at channel junctions, often giving rise to crossing situations. In addition, the eastern entrance of the Central Channel and the waters off the western entrance of the Strait are designated by the maritime authority as high-risk warning zones for collisions between merchant ships and fishing vessels, and the peak period for collisions occurs between 2300 and 0400. Furthermore, large numbers of fishing nets are deployed near the western reporting line, posing a direct threat to navigational safety.

Masters should maintain a proper lookout by means of radar, AIS, and visual observation, determine the nature of fishing vessel operations at an early stage, and take collision-avoidance action in good time. When passing close to fishing vessels, they should verify whether any contact or wash damage has occurred. In addition, while transiting the Qiongzhou Strait, the Master should be in command on the bridge and, where appropriate, post additional lookouts.

6. Adverse Weather and Temporary Traffic Control

The Strait frequently experiences heavy fog from January to March. Between June and August, the southwest monsoon brings winds of Force 6 or above and severe convective weather, while the northeast monsoon prevails in the Strait in winter. Any such meteorological conditions may result in temporary traffic control measures. Masters should closely monitor weather warnings and VTS broadcasts, and strictly comply with any control measures in force.

7. Pollution Prevention

7.1 Discharge of Ship-Generated Water Pollutants

The entire Qiongzhou Strait lies within China's internal waters (i.e., within the baselines of the territorial sea). Masters should therefore treat the Strait as a zero-discharge zone for oily wastewater containing cargo oil residues, noxious liquid substance residues, and ship-generated garbage. These wastes should be delivered to shore reception facilities after berthing, or discharged overboard once the vessel has proceeded to waters where such discharge is permitted.

7.2 Domestic Emission Control Areas (DECA) for Atmospheric Pollution from Vessels

The Qiongzhou Strait falls within the Hainan waters of the DECA. With effect from 1 January 2022, vessels calling at Hainan ports or transiting the Qiongzhou Strait must

use fuel oil with a sulphur content not exceeding 0.10% m/m, or adopt equivalent measures. It should also be noted that wash water from open-loop scrubbers must not be discharged within the DECA.

7.3 Documentation and Record-Keeping

Vessels should confirm that fuel switching has been completed and properly recorded before entering Hainan waters. In addition, Bunker Delivery Notes, representative fuel oil samples, and Fuel Oil Non-Availability Reports, where applicable, should be retained on board. Other statutory records, such as the Oil Record Book, Cargo Record Book, and Garbage Record Book, must be properly maintained. Maritime authorities may inspect these records. Any inaccuracies or omissions may result in administrative penalties, detention, or further enforcement action.

Recommendations

We recommend that this Circular be forwarded to all vessels intending to transit the Qiongzhou Strait for reference. It is important to note that this Circular is issued solely as a loss-prevention guidance document. The regulations, notices and operational requirements referred to herein are subject to change at any time. Therefore, before each transit, vessels should verify the currency of the relevant requirements and confirm the latest information regarding reporting requirements, water depths, traffic control measures, and other pertinent details, so as to ensure a safe and compliant transit.

For any related questions, please feel free to contact Huatai Beijing (pni.bj@huatai-serv.com) or our local branch offices.

Best regards,

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