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《加强中国沿海防范商渔船碰撞工作的建议》解读及安全航行指引

近期，中华人民共和国海事局向各直属海事局下发了《加强中国沿海防范商渔船碰撞工作的建议》（以下简称《建议》），针对渔业春汛期间中国沿海水域商渔船航行安全问题，提出了专项补充规定。应海事局要求，我们现将该《建议》作为附件随本通函转发，并结合华泰 [2025] 07 号通函《中国沿海商渔船碰撞风险分析及预防建议》，对《建议》的要点内容进行梳理解读，同时提出相关操作建议，供协会及会员参考。

《建议》的主要内容

除华泰 [2025] 07 号通函中的商渔船碰撞风险分析及防范建议外，《建议》还结合《中国沿海防范商渔船碰撞事故指引》相关要求，进一步补充提出以下重要内容：

一、强化岸基监控与指导

- 明确要求开展 24 小时岸基值班制度，岸基需履行船舶动态监控义务，实时接收主管机关发布的渔船密集水域、高风险水域、渔船集中进出港等预警信息。同时指导船舶开展航前风险评估，核查渔区航行计划、避让方案与值班安排，构建“岸基 - 船舶”协同防控机制。
- 上述要求虽主要适用于中国船东及中国籍船舶，我们仍建议所有船东及船舶均将该措施作为行业最佳实践参照执行。

二、细化航行要求

- 强调航行交接班时“避让优先”原则，要求必须在避让操作完成且驶过让清后再进行交接班，避免交接过程中因信息中断或干扰引发碰撞风险。
- 明确船舶航行于中国沿海渔船密集水域应加强驾驶台值班力量配备，驾驶台需保持至少两名值班人员，夜间渔区航行时船长应签发有关安全航行要求的夜航命令。
- 提供了更加具体的预防商渔船碰撞的建议，如：商船在确保自身航行安全情况下注意运用良好的船艺及早主动避让渔船，避免形成紧迫局面，最小会遇距离尽可能保持 1 海里以上（渔船密集水域尽可能保持 0.5 海里以上）；在避让拖网渔船时需保持距离其船艏不少于 1 海里距离，禁止从双拖渔船间通过；避让围网渔船需从其上风流侧保持安全距离通过。
- 远离低船速渔船。此类船舶可能处于捕鱼作业、锚泊或漂航状态，其驾驶台值班可能异常且 VHF、AIS 设备可能停止工作，需注意特别谨慎避让。

三、设备操作与应急处置方面

- 指出流刺网、张网及网箱作业渔船的渔网在电子海图上显示为三角形标识，同时提醒 AIS 网位仪可能影响航行值班人员对 AIS、ECDIS 和雷达信息的判断。
- 针对外籍船舶，强调通过 VHF 与渔船沟通时需充分考虑语言障碍。
- 提出商船在紧迫局面下的应急操纵措施，比如，果断采取减速、停车、倒车、改变航向避免船首与渔船侧面撞击，以最大程度减轻碰撞后果。
- 若发生碰撞事故须立即停船，始终将人命救助置于首位，在不危及自身安全的前提下，全力开展搜救且严禁擅自驶离现场，直至所有遇险人员脱险。同时通过 VHF、海事卫

星电话等有效途径，立即向就近海事管理机构报告事故位置、船舶名称、人员伤亡、船舶受损情况、天气海况及救助需求等详情，并通告周边船舶请求救助支援。

华泰建议

1. 组织船员对《建议》开展专项学习，准确把握各项防控要求与实操建议。
2. 本通函内容需结合华泰 [2025] 07 号、[2026] 02 号（中国沿海主要公共航路）通函协同研读，以全面理解中国沿海商渔船碰撞防范的各项实操要点与执行要求。
3. 据了解，该《建议》目前已下发至中国船东、渔业主管部门以及船舶代理等相关航运单位。部分海事局已明确要求船舶代理将《建议》转交船舶，并由船长签字确认收悉。建议各船舶高度重视，严格遵守文件中的相关规定，避免因违反操作要求而引发相关责任追究。
4. 建议各船东、船舶管理/经营人密切关注中国沿海水域商渔船碰撞风险动态变化，结合船舶实际航行情况，优化商渔船碰撞防控措施，降低碰撞事故风险，保障船舶、船员及货物安全。

我司将持续关注中国海事局关于商渔船碰撞防范工作的后续通知及要求，及时向各协会及会员传递相关信息。

如有任何相关问题，欢迎咨询华泰海事总部（pni.bj@huatai-serv.com）或当地机构。

华泰保险经纪有限公司



附件：

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加强中国沿海防范商渔船碰撞工作的建议

Notice on Strengthening the Prevention of Collisions between Merchant Ships and Fishing Vessels in Coastal Waters of China

春节假期后，正值中国沿海渔业春汛，沿海水域渔船数量将大幅增加，商渔船交汇密集，碰撞风险显著上升。为坚决防范商渔船碰撞事故，保障船舶航行安全，现就进一步加强防范商渔船碰撞工作提出如下建议：

Following the Spring Festival holiday, the coastal waters of China will enter the spring fishing season. The number of fishing vessels will increase sharply, resulting in dense encounters between merchant ships and fishing vessels and a significant rise in collision risks. To further prevent collisions between merchant ships and fishing vessels and ensure navigation safety, the following suggestions are hereby put forward.

一、加强岸基监控指导

1. Strengthen Shore-based Monitoring and Guidance

（一）开展 24 小时岸基值班，加强对所属船舶的动态监控，及时收取主管机关发布的渔船密集水域、高风险水域、渔船集中进出港等预警信息，指导所属船舶认真开展航前风险评估，重点核查渔区航行计划、避让方案与值班安排。

1. 1 Implement 24-hour shore-based watch-keeping, strengthen dynamic monitoring of your ships, and promptly receive early warning information issued by competent authorities on waters with dense fishing vessels, high-risk waters, and concentrated entry or exit of fishing vessels. Guide your ships to conduct thorough pre-voyage risk assessments, focusing on verifying voyage plans, collision prevention measures, and watch-keeping arrangements in fishing areas.

（二）制定航行计划时，应充分参考《沿海公共航路指南》《中华人民共和国海事局关于公布中国沿海商渔船碰撞高风险警示区的通告》《中国沿海防范商渔船碰撞事故指引》

等文件要求，合理规划航线，明确避让措施。

1. 2 When developing voyage plans, full reference should be made to documents 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, to plan reasonable routes and specify collision prevention measures.

二、加强航行安全工作

2. Enhance Navigation Safety

（一）航经中国沿海的船舶，应科学制定航次计划，计划航线尽量远离渔区和较大渔场，应尽可能使用推荐航路航行。航行交接班时，应全面交接周围商船、渔船动态及所有航行安全威胁，应在避让操作完成且驶过让清后再进行交接班。

2. 1 Ships navigating through coastal waters of China should develop sound voyage plans, keep routes as far away from fishing areas and major fishing grounds as possible, and use recommended routes wherever practicable. During navigation watch handover, a complete handover should be made, including the movements of surrounding merchant ships and fishing vessels, as well as all threats to navigation safety. Watch handover should only be carried out after collision prevention operations are completed and the ship has passed and cleared the other vessel.

（二）进入中国沿海渔船密集区前，应召开航行安全会议，明确航行要求。船舶航行于中国沿海渔船密集水域应加强驾驶台值班力量配备，驾驶台应保持至少两名值班人员，必要时船长亲自指挥。夜间渔区航行，船长应签发有关安全航行要求的夜航命令。

2. 2 Before entering areas with dense fishing vessels in the coastal waters of China, a navigation safety meeting should be convened to clarify navigation requirements. When navigating in waters with dense fishing vessels, ships should strengthen bridge watch-keeping manpower, with at least two watch-keeping officers on the bridge. The master should take command when necessary. When navigating in fishing areas at night, the master should issue night orders specifying safe navigation requirements.

（三） 进入渔区前，应对雷达、电子海图、船舶自动识别系统、航行数据记录仪、甚高频无线电话、应急电源，以及航行

灯、白昼信号灯和其他声响信号设备进行检查和测试。要检查“四机一炉”，确保工作状况良好；备妥主机，以便随时用车。要对手操舵（随动、非随动）、自动舵和应急操舵等操舵方式进行测试，确保操舵系统工作正常，以便紧急时随时操纵避碰。

2. 3 Before entering fishing areas, inspect and test 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 and other sound signalling equipment. Inspect the “four engines and one boiler” to ensure their good working conditions and stand by the main engine for immediate use. Test manual steering (follow-up, non-follow-up), automatic steering, and emergency steering to ensure the steering system functions properly for emergency collision avoidance manoeuvres.

（四） 避碰渔船时，在确保自身航行安全情况下注意运用良好的船艺及早主动避让渔船，避免形成紧迫局面，最小会遇距离尽可能保持 1 海里以上（渔船密集水域尽可能保持 0.5 海里以上），并综合运用 VHF16 频道、汽笛以及灯光等方式及早联系和警示渔船。

2. 4 When taking measures to avoid collision with fishing vessels, on the premise of ensuring the ship's own navigation safety, exercise good seamanship to take early and positive action to keep clear of fishing vessels, so as to avoid the close-quarters situation. The minimum distance at the closest point of approach (CPA) should be kept at no less than 1 nautical mile (0.5 nautical mile as far as possible in dense fishing areas). Use VHF Channel 16, the ship's whistle, and lights to carry out early communication and warning with fishing vessels.

（五） 避让正在捕鱼作业的渔船时，应与渔船及渔网保持足够的安全距离。避让拖网作业渔船时，应保持距离其船艉不少于 1 海里通过，禁止从双拖渔船间通过；避让围网作业渔船时，应从其上风流侧保持安全距离通过。

2. 5 When giving way to fishing vessels engaged in fishing operations, maintain a sufficient safe distance from both the vessels and their fishing nets. When passing a trawler, keep a distance of no less than 1 nautical mile from its stern. Crossing between pair trawlers is prohibited. When passing fishing

vessels engaged in seining operations, keep a safe distance to windward and upstream of the vessel.

三、做好应急救助工作

3. Emergency Response and Rescue

（一） 紧迫局面时，应果断采取减速、停车、倒车、改变航向避免船首与渔船侧面撞击或其他应急避让措施，以最大程度减轻碰撞后果。

3. 1 In a close-quarters situation, take decisive evasive actions such as slowing down, stopping, reversing, and altering course to avoid bow-on collision with the side of fishing vessels, to minimize collision consequences.

（二） 发生碰撞事故后，应将人命救助置于首位，采取一切办法，全力救助人命；应通过一切有效途径，立即向就近的海事管理机构报告，报告内容应包含事故发生位置、遇险船舶名称、人员伤亡情况、船舶受损情况、天气海况、救助需求等。同时，通告周围船舶，请求参与救助。

3. 2 In the event of a collision, prioritize the rescue of human life and adopt all possible measures to rescue persons in distress. Immediately report to the nearest maritime administration through all effective means, including the location of the incident, name of the vessel in distress, casualties, ship damage, weather and sea conditions, and rescue needs. Meanwhile, notify surrounding vessels and request their assistance in rescue operations.

四、其他有关注意事项

4. Other Important Notices

（一） 渔船从事流刺网、张网和网箱捕鱼作业活动时，通常使用 AIS 网位仪显示渔网，在电子海图上显示为三角形图形标识。AIS 网位仪可能影响航行值班人员对船舶 AIS、ECDIS 和雷达信息的判断，需重点关注识别。

4. 1 Fishing vessels engaged in drift netting, stow netting and cage fishing usually use fishing net position AIS locator to indicate fishing nets, which appear as triangular symbols on ECDIS. Fishing net position AIS locator may affect watch-keepers' judgment of shipborne AIS, ECDIS and radar information,

requiring special attention and identification.

(二) 渔船在从事捕鱼作业时，可能未按照规则显示相应的号灯号型。应远离低船速渔船，此类渔船可能处于捕鱼作业、锚泊或漂航状态，可能值班异常，甚高频或 AIS 设备可能停止工作。部分木质渔船因其材质和构造，可能难以被雷达识别。

4. 2 Fishing vessels engaged in fishing operations may fail to exhibit appropriate lights and shapes in accordance with regulations. Keep clear of low — speed fishing vessels, which may be operating, anchored or adrift, possibly with improper watch-keeping or switched — off VHF/AIS equipment. Some wooden fishing vessels may be difficult to be detected by radar due to their material and structure.

(三) 渔船有可能会因保护其渔网而突然改变航向、加速，需加强瞭望。

4. 3 Fishing vessels may suddenly alter course or increase speed to protect their fishing nets. Enhanced lookout is required.

(四) 外籍船舶在中国沿海与渔船通过 VHF 沟通时，应充分考虑语言问题。

4. 4 Foreign ships communicating with fishing vessels via VHF in the coastal waters of China should fully consider language barriers.