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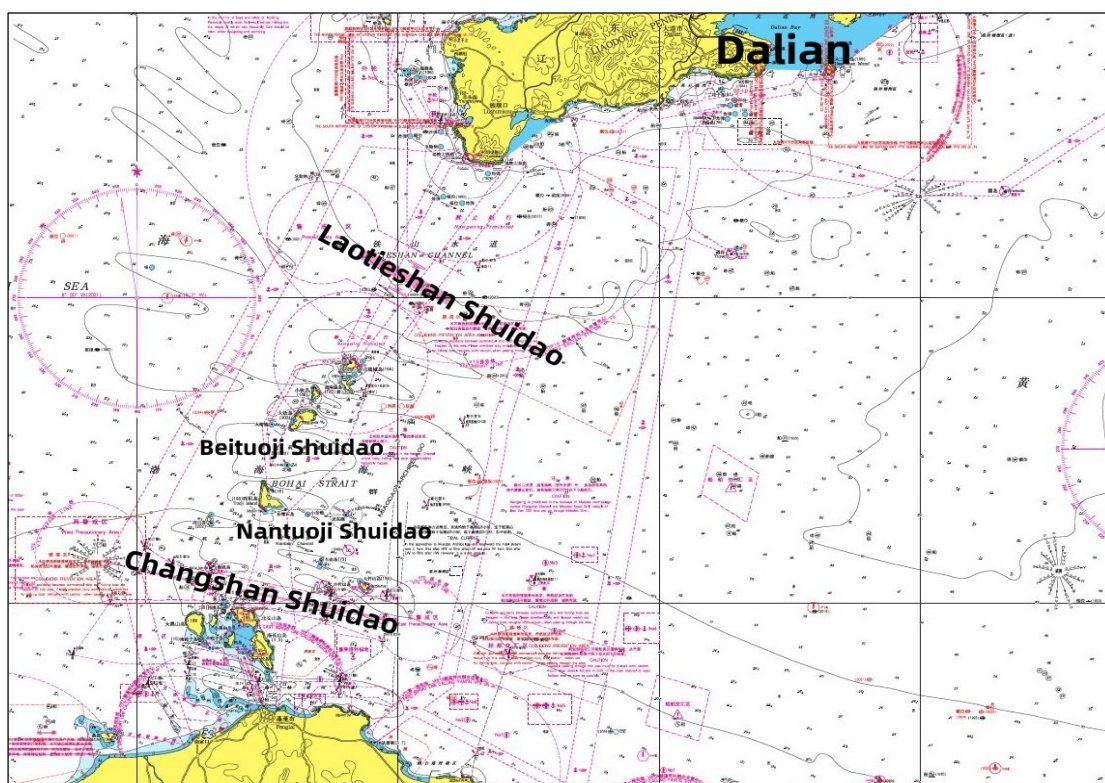
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PNI [2025] 03

2025 年 3 月 31 日



切勿未经授权非法穿越砣矶水道

烟台海事局近期分享了一艘散货船意图穿越砣矶水道的典型案例,并借此案例提醒船舶切勿非法穿越砣矶水道。非法穿越砣矶水道不仅可能导致行政处罚,更极易引发对船舶航行安全构成重大威胁的碰撞、搁浅、触礁等严重航行事故。受烟台海事局委托,我们特发布此通函,旨在帮助各协会及会员及时、全面地了解这一重要安全提醒。

华泰建议

砣矶水道由北砣矶水道和南砣矶水道构成, 位于老铁山水道和长山水道之间 (见封图)。近年来, 部分船舶因不了解砣矶水道禁航规定, 错误选择该水道进出渤海海峡, 因而受到海事局的行政处罚。华泰在此类案件处理方面拥有丰富经验, 近几年已成功处理数起类似案例。为帮助船舶规避航行风险, 降低违规受罚概率, 我们提出如下建议供参考:

一、船东/船舶管理人将此通函发放至其所有/所管理的船舶, 使船长和驾驶员充分认识到: 1) 未经授权穿越砣矶水道是海事局明令禁止的违法行为, 以及, 2) 200 总吨以上的商船进出渤海海峡只有老铁山水道和长山水道可供通行, 除此之外的其它水道禁止通行, 在进行航路设计时应特别注意这一要求。

二、考虑到老铁山水道相较于长山水道拥有更为开阔的可航水域和更大的水深, 对于驶往/驶离天津港、曹妃甸以及京唐港的吨位较大的船舶在通过渤海海峡时可优先考虑使用老铁山水道以降低航行风险。

三、航行于渤海海峡及其附近海域的船舶, 如安全可行, 尽可能沿着海事局公布的公共航路航行, 请参考 **PNI [2023] 12** 号华泰通函获取详细的公共航路信息以及我们的建议。

如有任何相关问题, 欢迎咨询华泰海事总部 (pni.bj@huatai-serv.com) 或华泰青岛海事部 (qingdao@huatai-serv.com) 。

华泰保险经纪有限公司



附件 - 海事局文件原文

中英双语提醒：船舶切勿非法穿越砣矶水道 Chinese-English Reminder: Do not Cross Tuoji Shuidao Without Authorization

一、航行安全风险

I. Risks of safety Navigation

案例分析：2025 年 3 月 18 日 1449 时，马绍尔群岛籍散货船“D*”轮意图穿越砣矶水道，烟台海事局值班人员电子巡查发现后立即通过甚高频提醒该轮前方为禁航区，要求该轮调整航向使用老铁山水道或长山水道，船舶之后调整航向至老铁山水道航行。事后核查该轮航次计划发现，该轮原计划穿越砣矶水道驶抵下一港。得益于烟台海事局值班员的及时发现和提醒，避免了该轮穿越砣矶水道禁航区而导致的行政处罚、触损事故等后果。

CASE STUDY: At 1449 LT, March ,18, 2025, the Marshall Islands flag bulk carrier "D*" intended to pass through Tuoji Shuidao. The officer on watch of Yantai MSA immediately informed the vessel by VHF that the Tuoji Shuidao is a prohibited area and remind the vessel to alter course to Laotieshan Shuidao or Changshan Shuidao for safe navigation. The vessel followed the instruction and altered course to Laotieshan Shuidao. The later investigation found the bulk carrier "D*" planned to cross Tuoji Shuidao, and with the timely instruction of Yantai VTS , the vessel avoided administrative penalties and accidents that may be caused by crossing Tuoji Shuidao without authorization.



渤海海峡是船舶进出渤海的唯一海上通道。位于海峡中南部的庙岛群岛将海峡自北向南有老铁山水道，北砣矶水道，南砣矶水道，长山水道，登州水道。

Bohai Haixia is the only sea passage for ships entering and leaving the Bohai Sea. Miaodo Qundao, located in the south-central part of the strait, divide the strait from north to south into Laotieshan Shuidao, Beituoji Shuidao, Nantuoji Shuidao, Changshan Shuidao, and Dengzhou Shuidao.

根据相关规定：庙岛群岛水道除老铁山水道、长山水道和登州水道（限 200 总吨以下船舶航行），其它诸水道禁止国内外商船通行。如果船舶在 200 总吨以上，进出渤海海峡，只有老铁山水道、长山水道可供通行。

According to the relevant regulations, the waterways of the Miaodo Qundao are forbidden for domestic and foreign merchant ships to pass through , except Laotieshan Shuidao, Changshan Shuidao and Dengzhou Shuidao (Only vessels of 200gt or less are permitted to use Dengzhou

Shuidao). If the ship GRT is more than 200, to enter and/or leave the Bohai Haixia, only the Laotieshan Shuidao and Changshan Shuidao can be used.

船舶穿越砣矶水道（南砣矶水道、北砣矶水道）禁航区，不仅面临海事部门的行政处罚，还存在以下安全风险。

Ships crossing the prohibited area of Tuoji Shuidao (Nantuoji Shuidao, Beituoji Shuidao) not only faces administrative penalties from the maritime department, but also has the following safety risks.

1、触碰事故。砣矶水道（南砣矶水道、北砣矶水道）周边水域存在大量海上养殖和定置网具，船舶穿越砣矶水道会导致触碰养殖或者定制网具事故。

1. Accidents of touching and damaging aquaculture. Large amount of marine farms and rigged fishing nets existed in Tuoji Shuidao (Nantuoji Shuidao, Beituoji Shuidao) water area, unauthorized passing through this area might cause accidents.

2、搁浅和触礁事故。砣矶水道（南砣矶水道、北砣矶水道）为禁航区，海测部门难以对相关水域开展勘测，通航资料更新慢。航海出版物上显示的水深等数据资料可能并不准确，北砣矶水道存在礁石，船舶尤其是大型船舶航行容易造成搁浅或触礁事故。

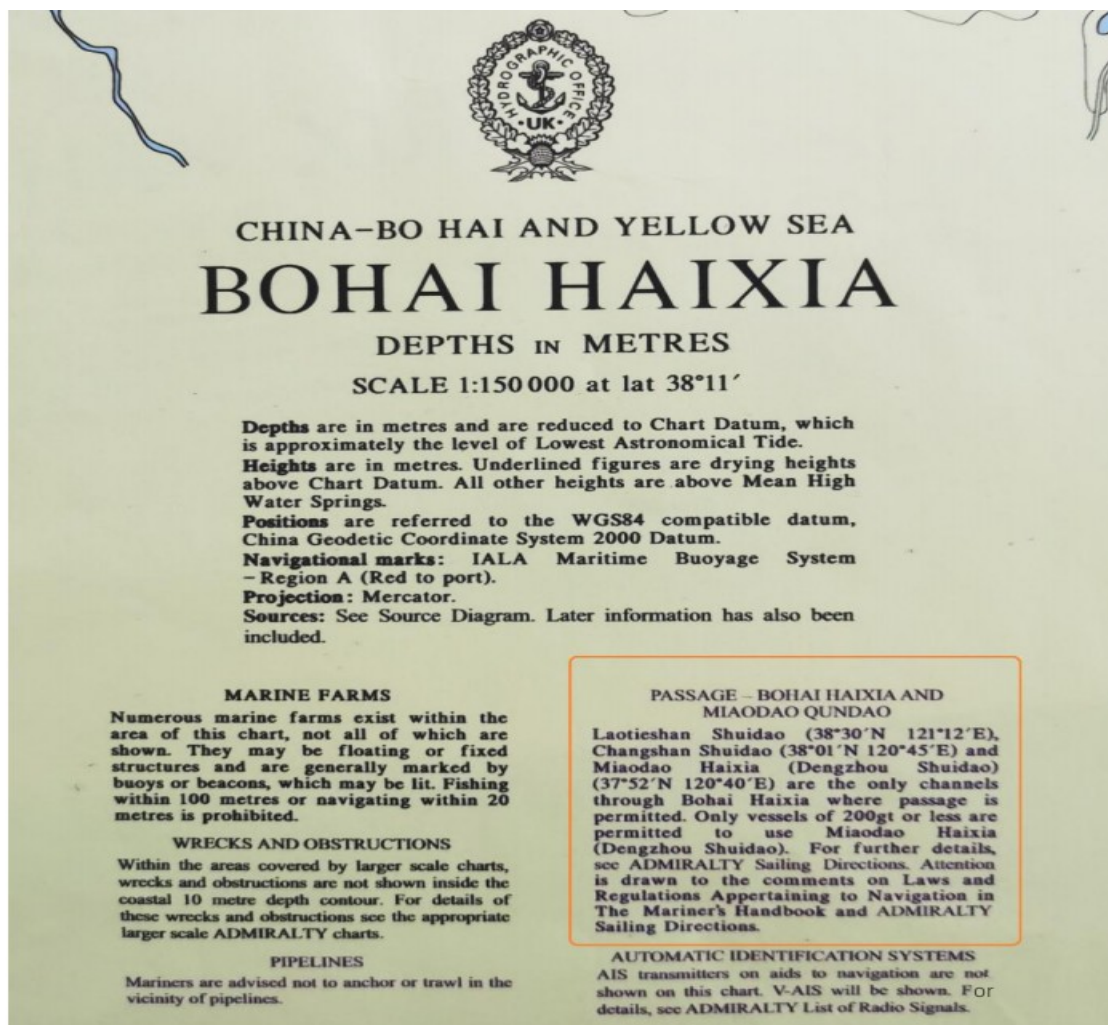
2. Grounding accidents. Tuoji Shuidao (Nantuoji Shuidao, Beituoji Shuidao) is a prohibited area, the National Hydrographic Department cannot survey and update the hydrographic information to date regularly. The hydrographic information of Nautical Publications/Charts in this area might be inaccurate.

Unknown rock(s) reported in Beituoji Shuidao, any unauthorized ship, especially large ships, passing this area may cause grounding accidents.

二、航海出版物及海图中的相关信息

II. Related information in nautical publications and nautical charts

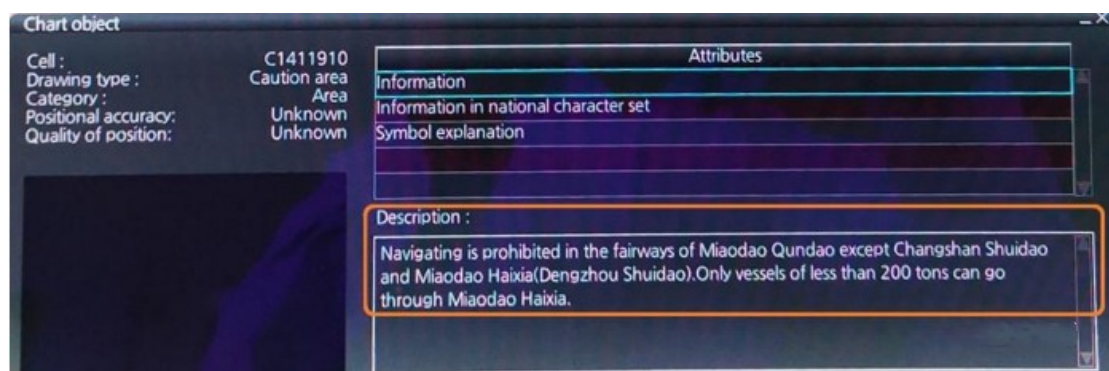
纸质海图：在相关英版海图（如 BA1206）上警示信息指出，老铁山水道、长山水道和庙岛海峡（登州水道）是通过渤海海峡的通航水道。值得注意的是只有 200 总吨以下的船舶才可以通过庙岛海峡（登州水道）。



英版海图 British Admiralty Chart

Paper chart: Warning information on the British Admiralty Chart, (e.g. BA1206) states that Laotieshan Shuidao, Changshan Shuidao and Miaodao Haixia (Dengzhou Shuidao) are navigable waterways through the Bohai Haixia. It shall bear in mind that only vessels of 200gt or less are permitted to use Miaodao Haixia (Dengzhou Shuidao).

电子海图：以下快照显示了一款电子海图（ECDIS）上的警示信息：除长山水道和庙岛海峡（登州水道）外，庙岛群岛（的）其他水道禁止通行。



电子海图（ECDIS）上的警示信息
Warning information on the ECDIS

Electronic Charts: The following snapshot shows a warning information on one of the electronic charts (ECDIS) that navigating is prohibited in the fairways of Miaodao Qundao, except Changshan Shuidao and Miaodao Haixia(Dengzhou Shuidao). Only vessels of less than 200 tons can go through Miaodao Haixia.)

航路指南：英版航路指南 NP32B 规定，外国船舶只允许使用三个水道通过渤海海峡，即庙岛群岛北部的老铁山水道，长山

水道，以及庙岛海峡（登州水道）（仅适用总吨不超过 200 的船舶）。

CHAPTER 3	
COAST OF CHINA FROM CHENGSHAN JIAO TO YALUJIANG KOU (AMNOKKANG KU) INCLUDING BOHAI HAIXIA AND APPROACHES	
GENERAL INFORMATION	
Scope of the chapter 3.1	of this current sets W through Bohai Haixia. Throughout the year a coastal current sets E along the N coast of Shandong Bandao and around Chenshan Jiao. The surface currents are considerably affected by the prevailing winds.
1 This chapter covers the N coast of Shandong Bandao from Chengshan Jiao (37°23' 70N 122°42' 18E) to Penglai Tou (37°49' 93N 120°44' 58E), 97 miles W, and the several channels of Bohai Haixia with their approaches, and the S coast of Liaodong Bandao from Laotieshan Xijiao (38°43' 64N 121°08' 09E), to the approaches to Yalu Jiang, known in Korea as Amnok Kang, (39°46' 00N 124°07' 00E). The chapter is arranged as follows:	2 Tidal streams are complicated by the coastal configuration, with the rising tide setting in a general N direction into this part of Huang Hai, and then W through Bohai Haixia. The tidal streams are mostly reversing and generally follow the direction of the shore. They attain a rate of about 1½ kn, but may attain 2 kn or more at spring tides.
2 Through routes - Chengshan Jiao to Bohai Haixia (3.5). Offshore route - Chengshan Jiao to Yalu Jiang (Amnok Kang) (3.32). Chengshan Jiao to Sang Dao (3.37). South coast of Liaodong Bandao, Changshan Gundao and Yalu Jiang (3.150).	3 Ice may form along the N shore of Huang Hai from the middle part of November to the end of March. It does not normally occur along the N coast of Shandong Bandao, but Yantai Gang (37°34' 20N 121°24' 00E) has been known to freeze over. Drift ice may be met, during January to March, in the narrow part of Bohai Haixia.
Satellite-derived positions 3.2	Buoyage in winter 3.4
1 See 1.32.	1 During the winter months a number of buoys, particularly in port approaches and waters, are removed or replaced by ice buoys in N area of Yellow Sea. Details may be promulgated by local Notice to Mariners.
Natural conditions 3.3	
1 Flow. A branch of the Tsushima warm current sets N into Huang Hai (Yellow Sea) at an average rate of 0.1 kn, being at its strongest in summer. A small part	
THROUGH ROUTES — CHENGSHAN JIAO TO BOHAI HAIXIA	
General information	Dalian VTS is compulsory for vessels passing through its area. For details see <i>ADMIRALTY List of Radio Signals</i> Volume 6(6).
Area covered 3.5	Traffic regulations 3.8
1 The areas covered in this section are the direct offshore routes from the TSS precautionary area N of Chengshan Jiao to Miaodao Haixia, Changshan Shuidao and Laotieshan Shuidao, the three channels through Bohai Haixia that are permitted for foreign vessels, see 3.6. It is arranged as follows:	1 Traffic separation schemes, with precautionary areas in the approaches, are established off Chengshan Jiao (2.169), and through Changshan Shuidao (3.12) and Laotieshan Shuidao (3.26). Restricted areas. Anchoring and fishing are prohibited due to the presence of submarine cables in the E and W approaches to Bohai Haixia and in Changshan Shuidao as indicated on the chart.
2 Chengshan Jiao through Changshan Shuidao to Bohai Haixia (3.10). Chengshan Jiao through Laotieshan Shuidao to Bohai Haixia (3.23).	2 Prohibited areas. The following areas are closed to foreign shipping: The areas of Bohai Haixia outside the permitted channels, see 3.133. An area 7 miles in radius around Beihuangcheng Dao Light (38°23' 69N 120°54' 60E). An area 10 miles in radius to the S and E of Laotieshan Xijiao Light (38°43' 64N 121°08' 09E) and to 5½ miles W.
Routes 3.6	Marine farms 3.9
1 Foreign vessels are permitted to use only three of the channels through Bohai Haixia as follows: Changshan Shuidao (3.10), Laotieshan Shuidao (3.30) to the N of Miaodao Gundao, and; Miaodao Haixia (3.133); vessels of 200 gt or less only are permitted to use this channel.	1 Marine farms for the cultivation of shellfish and kelp, and numerous fishing nets exist in Bohai Haixia, mainly in the prohibited areas (see 3.8), especially during the fishing season from June to September. Mariners should proceed with caution.
vessel traffic services 3.7	
1 VTSs are in operation for Chengshan Jiao (2.173), Changshan Shuidao (3.10), Laotieshan Shuidao (3.30) and are compulsory for most vessels. Use of the Yantai VTS (3.97), Beichangshan Shuidao VTS or	

英版航路指南 NP32B 规定
ADMIRALTY Sailing Directions NP32B

Sailing Direction: ADMIRALTY Sailing Directions NP32B states that foreign vessels are permitted to use only three of the channels through Bohai Haixia as follows: Changshan Shuidao, Laotieshan Shuidao in the northern part of the Miaodao Qundao and; Miaodao Haixia; vessels of 200 gt or less only are permitted to use this channel.)

其他海事安全信息

Other maritime safety information

烟台海事局针对外轮违规穿越砣矶水道问题，发布了多条航行警告（NW）和航海通告（NTM），如 2017 年 NW SD0434、NTM NO.068，2020 年 NTM NO.0519，2022 年 NW SD0088。

Yantai MSA has issued a number of navigational warnings(NW) and notices to mariners (NTM) in response to the problem of foreign vessels illegally crossing Tuoji Shuidao, such as NW SD0434, 2017, NTM NO.068, NTM NO.0519, 2020, and NW SD0088。(2017 NW SD0434) (NTM NO.068) (2020 NTM NO. 0519) (2022 NW SD0088)



庙岛群岛水道禁航区信息提醒-鲁航警0468

发布日期: 2017-11-17 11:03 信息来源: 通航管理处 访问次数: 141 字号: [大] [中] [小]

鲁航警0468

庙岛群岛水道除长山水道和登州水道外, 其它诸水道禁止任何商船航行。登州水道限200总吨以下船舶航行。

请各航船注意。

SD0434

NAVIGATING IS PROHIBITED IN THE FAIRWAYS OF MIAODAO ARCHIPELAGO EXCEPT CHANGSHAN CHANNEL AND DENGZHOU CHANNEL. ONLY VESSELS OF LESS THAN 200TONS CAN GO THROUGH MIAODAO STRAIT.

CAUTION ADVISED.

SHANDONG MSACHINA.

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(2017 NW SD0434)



庙岛群岛水道禁航区信息提醒-烟海航〔2017〕068号

发布日期: 2017-11-17 11:05 信息来源: 通航管理处 访问次数: 172 字号: [大] [中] [小]

近期, 发现船舶违反相关规定, 穿越庙岛群岛水域禁航区。为预防类似事故再次发生, 特此通告: 庙岛群岛水道除长山水道和登州水道外, 其它诸水道禁止任何商船航行。登州水道限200总吨以下船舶航行。

[【打印本页】](#) [【关闭窗口】](#)

(NTM NO. 068)



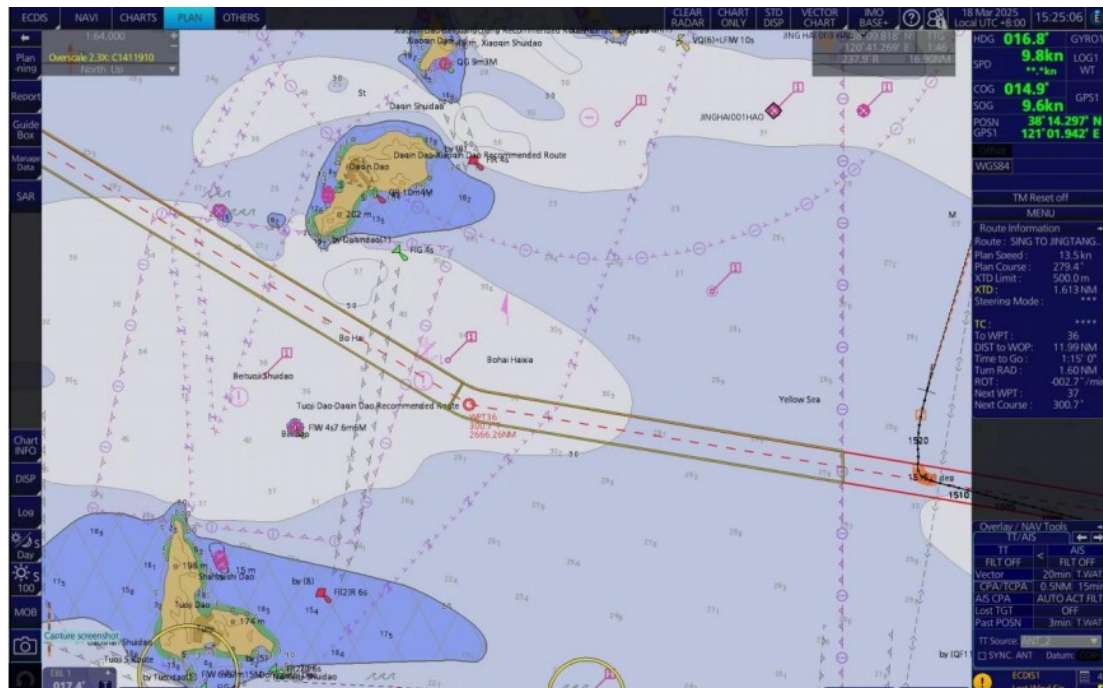
(2020 NTM NO. 0519)



(2022 NW SD0088)

部分外轮船舶海图上显示的“Tuoji Dao-Daqin Dao Recommended Route”是指“砣矶岛-大钦岛”陆岛交通运输推荐航路，并非穿越砣矶水道禁航区的推荐航路。（详见中华人民共和国山东海事局《航行通告》鲁航通〔2023〕0738号）"Tuoji Dao-Daqin Dao Recommended Route" shown on the chart of some foreign ships refers to the recommended

route for land-island transportation of "Tuoji Dao-Daqin Dao", which is not a recommended route through the restricted area of Tuoji Shuidao. (For details, please refer to the "Notice of Navigation" of Shandong MSA of the People's Republic of China, Luhangtong [2023] No. 0738)



三：原因分析

III: Analysis of causes

1、外轮对水道禁航的规定不熟悉。穿越禁航区的船舶均为外国船舶。砣矶水道（北砣矶水道、南砣矶水道）一直禁止船舶航行，已为中国籍船舶、船员所熟知，外国籍船舶船员对该水道禁航的相关规定不熟悉，偶有擅自驶入或穿越禁航区现象。

1. Foreign vessels are unfamiliar with the prohibition of navigation in waterways. According to analysis of record, Ships crossing the Tuoji Shuidao (Nantuoji Shuidao, Beituoji Shuidao) prohibited zone are all foreign ships. This prohibition rule is well known to

Chinese ships and crew, The crew of foreign vessels are unfamiliar with the relevant regulations on the prohibition of navigation in this waterway, and occasionally enter or cross the prohibited area without authorization.

2、电子海图的航行注意事项不直观。电子海图信息显示系统已普遍配备到船，多数大型船舶配备 2 台电子海图以取代纸质海图。较之纸质海图，电子海图的航行注意事项不直观，都置于下拉菜单中，往往易被船员忽视。

2. The navigational notes display on electronic charts are not intuitive. And most large ships have two sets of ECDIS in replace of paper charts. Comparison with paper charts, the navigational notes placed in the drop-down menu display on ECDIS are not intuitive , which is often easily ignored by the crews.

3、电子海图中水域标注名称外籍船员难以理解。许多英版出版物中的地理名称使用了中文拼音而不是对应的英文翻译，群岛、水道、海峡等名称均以汉语拼音标识，对于外国籍船员而言，从复杂的电子海图界面上查找到 QUNDAO、SHUIDAO、HAIXIA 等名称，实属不易。

3. Difficulty of understanding the names of water in Chinese pinyin marked on ECDIS. The geographical names in many British admiralty publications use Chinese pinyin instead of corresponding English translations, and the names of islands, waterways, straits, etc. are all identified in Chinese pinyin system. For foreign crews, it is not easy to find the names meaning of QUNDAO, SHUIDAO, HAIXIA, etc. from the complex ECDIS interface.

4、船舶可能为避开军事演习水域或渔船密集区域而选择砣矶水道。渤海和黄海北部经常开展军事演习，为避免此类活动可能造成的拥堵或延误，有些船舶可能会寻求其他“替代路线”。在渔汛季节，渤海海峡和黄海北部会有大量的渔船，如果船舶预计通过老铁山水道或长山水道存在大量的渔船，可能会寻求其他“替代航线”。

4. For avoidance of military exercises or heavy fishing area and mistakenly entering the prohibition zone. Unscheduled Military exercises are frequently conducted in the Bohai Sea and the northern Yellow Sea, The ship may seek alternative routes to avoid the congestion or delays that may result from such activities. During the fishing season, there are large numbers of fishing vessels in the Bohai Haixia and the northern part of the Yellow Sea, and ships may seek alternative routes if they anticipate the presence of large numbers of fishing vessels through Laotieshan Shuidao or Changshan Shuidao.

四、相关法律责任

IV. Relevant legal responsibilities

根据《海上交通安全法》第四十四条的规定，船舶不得违反规定进入或者穿越禁航区。

According to article 44 of *MARITIME TRAFFIC SAFETY LAW OF THE PEOPLE'S REPUBLIC OF CHINA*, No vessel may enter or pass through a prohibited navigation area in violation of the provisions.

第一百零三条第七款列明了对违反规定进入或者穿越禁航区的处罚：船舶的所有人、经营人或者管理人处二万元以上二十

万元以下的罚款；船长、责任船员处二千元以上二万元以下的罚款，暂扣船员适任证书三个月至十二个月；情节严重的，吊销船长、责任船员的船员适任证书。

Paragraph 7 of Article 103 sets out the penalties for entering or passing through a prohibited navigation zone in violation of the provisions: impose a fine of not less than 20,000 yuan but not more than 200,000 yuan on its owner, operator or manager, and impose a fine of not less than 2,000 yuan but not more than 20,000 yuan on the captain and crew member liable, and temporarily seize the certificate of competency for 3 to 12 months; if the circumstances are serious, the certificate of competency of the captain or crew member liable shall be revoked.