

### NOTICE ABOUT COMPLIANCE WITH LOW-EARTH ORBIT SATELLITE COMMUNICATION EQUIPMENT USE IN CHINESE TERRITORIAL WATERS

Recently, China MSA (CMSA) investigated and dealt with illegally using low-earth orbit satellite communication equipment by one vessel within China's jurisdictional waters. This behavior violated the laws of the People's Republic of China.

#### CASE STUDY

During a routine PSC inspection on a vessel in China, CMSA officers found a micro matrix antenna installed on the Compass deck, which was significantly different from conventional ones. It was confirmed to be a low-earth orbit satellite communication system manufactured and serviced by a non-Chinese company. After entering China's territorial seas, the vessel continuously used this system, however, all the data had not been transited through China's satellite gateway stations, which was determined to have violated relevant regulations. Therefore, the vessel was imposed with an administrative penalty.



(Not an actual photo, for reference only)

#### LEGAL BASIS

##### **Law of the People's Republic of China on Maritime Traffic Safety**

*Article 24, where a vessel requires the use of a shore-based radio station for communication within the waters under the jurisdiction of the People's Republic of China, such communication shall be relayed through a legally established domestic coastal radio station or satellite gateway station.*

##### **Regulations of the People's Republic of China on Radio Management**

*Article 54, radio stations installed on foreign vessels (including offshore units), aircraft, railway locomotives, vehicles, and other similar equipment operating within the territory of China shall comply with the laws and regulations of China, as well as international treaties to which China is a party.*

To ensure data security, Chinese law explicitly stipulates that the use of such communication methods within jurisdictional waters must be relayed through satellite gateway stations lawfully established within China. Illegal use of satellite gateway stations located overseas for data exchange poses a threat to China's communication and information security. Chinese law further stipulates that the use of radio frequencies for communications requires approval and authorization from the competent authorities. Unauthorized use not only infringes upon China's radio spectrum resources but may also cause interference to nearby radio equipment operating on adjacent frequencies.

Furthermore, in accordance with SOLAS, radio communication equipment used on board must comply with the corresponding performance standards adopted by the IMO. Mobile satellite services employed for GMDSS must be recognized by the IMO, such as Inmarsat and Iridium. The use of unrecognized or non-compliant satellite communication equipment may compromise the integrity of a vessel's GMDSS system, jeopardize navigational safety, and constitute a violation of port state requirements.

### RECOMMENDATIONS FROM CHINA CLASSIFICATION SOCIETY

To avoid similar penalties, potential detention, and further schedule delays, all shipping companies are advised to,

1. When using radio communication equipment within Chinese jurisdictional waters, comply with Chinese laws, regulations, and relevant administrative rules, and avoid direct data exchange with overseas satellite gateway stations;
2. Ensure all navigation safety-related radio equipment is approved by the flag state or its authorized RO and aligns with vessel documentation such as the Radio Station License and Cargo Ship Safety Radio Certificate;
3. Consult classification societies or radio service suppliers before adding or updating any radio equipment to avoid using non-approved devices.

### CONTACT DETAILS

Survey Division, International Survey Management Department

Email: [survey@ccs.org.cn](mailto:survey@ccs.org.cn)

For urgent business matters after office hours, please call our 24/7 service hotline at +86-10-5811-3599

#### **Disclaimer of Liability**

Although all possible efforts have been made to provide accurate and complete information, CCS is not responsible for any errors or omissions made herein, nor held liable for any actions taken by any party as a result of information retrieved from this information service.