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02.10.2025

Konu : Çin'in Uluslararası Deniz Taşımacılığı
Düzenlemeleri Hk.

Sirküler No: 752

Sayın Üyemiz,

Uluslararası Deniz Ticaret Odası (ICS) tarafından Odamıza gönderilen 30.09.2025 tarihli Ek'te sunulan e-posta yazısında;

Çin Halk Cumhuriyeti tarafından Uluslararası Deniz Taşımacılığı'na İlişkin Yönetmeliklerinde yapılan değişikliklerin 29 Eylül 2025 tarihinde Xinhua Haber Ajansı tarafından duyurulduğu belirtilmekte olup bahse konu yönetmeliklerde değişiklik öngören Devlet Konseyi kararının Çin Halk Cumhuriyeti Başbakanı Li Qiang tarafından imzalanmasını takiben söz konusu değişikliklerin 28 Eylül 2025 tarihinden itibaren yürürlüğe girdiği bildirilmektedir.

Yazıda; Çin' in Uluslararası Deniz Taşımacılığına İlişkin Yönetmeliklerinde yapılan söz konusu değişikliklerin EK-A'da yer alan ICS Çin İrtibat Ofisi Raporu'nda özetlendiği ifade edilerek; bahse konu değişikliklerin; uluslararası deniz taşımacılığı faaliyetlerini standartlaştırmayı, adil rekabeti sağlamayı, uluslararası denizcilik piyasasındaki düzeni korumayı ve uluslararası deniz taşımacılığında yer alan paydaşların meşru hak ve çıkarlarını korumayı amaçladığı belirtilmektedir.

ICS, Ek-A'da yer alan 46. Madde kapsamında; herhangi bir ülke veya bölge tarafından Çin Halk Cumhuriyeti'nin uluslararası deniz taşımacılığı faaliyetleri ve ilgili yan hizmetlerinde yer alan işletmecilere, gemilere veya mürettebata karşı ayrımcı yasaklar, kısıtlamalar ya da benzeri önlemlerin uygulanması halinde, Çin tarafından bu ülke veya bölgeye karşı özel ücretler ya da giriş-çıkış kısıtlamaları uygulanabileceğine dikkat çekmektedir.

ICS, ayrıca, 46. Maddenin; ABD'nin Çin denizcilik sektörüne yönelik olarak başlattığı USTR 301. Bölüm soruşturması ve önerilen ücret uygulamalarına yönelik yeni karşı önlemler geliştirdiğini belirterek Çin Hükümeti'nin, ABD önlemlerini Çinli gemi sahiplerine karşı ayrımcı ve 2003 Çin-ABD Denizcilik Anlaşması'nın özellikle vergi ve ücretlerin karşılıklı muamele ilkesini güvence altına alan 6. Madde ihlali olarak değerlendirmekte olduğunu ifade etmektedir.

ICS, Çin Hükümeti'nin söz konusu anlaşma kapsamında, Çin limanlarına yanaşan ABD gemilerine ek ücretler uygulamak ve ABD yapımı gemilerin Çin limanlarına erişimini kısıtlamak veya yasaklamak gibi önlemler aldığını belirtmektedir.

Bu belge, 5070 sayılı Elektronik İmza Kanuna göre Güvenli Elektronik İmza ile imzalanmıştır.



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Çin Halk Cumhuriyeti'nin Uluslararası Deniz Taşımacılığına İlişkin Yönetmeliklerinde yapılan değişiklikleri içeren ICS Çin İrtibat Ofisi Raporu Ek-A'da yer almaktadır.

Bilgilerinize arz ve rica ederim.

Saygılarımla,

e-imza

İsmet SALİHOĞLU
Genel Sekreter

Ek:

- 1- ICS'den Alınan 30 Eylül 2025 Tarihli E-Posta (2 Sayfa)
- 2- EK-A ICS Çin İrtibat Ofisi Raporu (3 Sayfa)

Dağıtım:

Gereği:

- Tüm Üyeler (Odamız Web sitesi ve e-posta ile)
- Türk Armatörler Birliği
- SS Armatörler Taşıma ve İşletme Kooperatifi
- GİSBİR (Türkiye Gemi İnşa Sanayicileri Birliği

Derneği)

- VDAD (Vapur Donatanları ve Acenteleri Derneği)
- TÜRK LİM (Türkiye Liman İşletmecileri Derneği)
- KOSDER (Koster Armatörleri ve İşletmecileri Derneği)
- GBD (Gemi Brokerleri Derneği)

Bilgi:

- Yönetim Kurulu Başkan ve Üyeleri

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30 September 2025

SPC(25)62

TO: SHIPPING POLICY COMMITTEE

COPY: BOARD MEMBERS

CHINA UPDATES REGULATIONS ON INTERNATIONAL MARITIME TRANSPORT

Action required: Members are requested to note the below and attached updates to the Regulations of the People's Republic of China on International Maritime Transportation. Members are advised to provide any comments or questions to the undersigned (rachel.noronha@ics-shipping.org).

Background

Members are to be advised of recent amendments to the Regulations of the People's Republic of China on International Maritime Transportation, which have been reported by the Xinhua News Agency on 29 September 2025. Chinese Premier Li Qiang has signed a State Council decree introducing amendments to the regulations, which officially came into effect on 28 September 2025.

The aim of these amendments is to standardise international maritime transport activities, ensure fair competition, maintain order in the international shipping market, and protect the legitimate rights and interests of stakeholders in international ocean shipping. The key amendments are summarised in the report from ICS China Liaison Office attached as **Annex A**.

These amendments include the introduction of countermeasures under Article 46, in the form of special fees or entry and exit restrictions on ships *"if any country or region adopts or assists, supports, or takes discriminatory prohibitions, restrictions, or other similar measures against operators, ships, or crew members engaged in international maritime transportation and its auxiliary businesses of the People's Republic of China"*.

This amendment to Article 46 is seen as a direct response to the USTR Section 301 investigation and proposed fee imposition targeting China's maritime sector, as these measures from the U.S. have been deemed discriminatory against Chinese shipowners and a violation of the 2003 China-U.S. Maritime Agreement, particularly Article 6 which ensures reciprocal treatment in the imposition of taxes and fees. Under this agreement, China reserves the right to implement reciprocal punitive measures, which may include:

- Imposing additional fees on U.S. ships docking at Chinese ports.

- Restricting or prohibiting U.S.-manufactured ships from accessing Chinese ports.

It appears that the Chinese Government may have introduced this countermeasure in advance of the scheduled implementation of the USTR Section 301 actions on 14 October, potentially using it as leverage in the next round of U.S.-China trade negotiations which are entering a more complex stage and include USTR Section 301 measures as one of the key issues to be addressed.

It is anticipated that the Ministry of Transport, as the competent transportation department of the State Council in China, will soon update its Detailed Rules for the Implementation of the Regulations on International Maritime Transportation in light of these amendments. The ICS China Liaison Office will closely monitor the developments, and the Secretariat will circulate any further updates accordingly.

Members are advised to direct any questions or comments to (Rachel.noronha@ics-shipping.org) or the ICS China Liaison Office (edward.liu@ics-shipping.org).

[SPC\(25\)62 -Annex A - ICS China Liaison Office report - China Updates Regulations on International Maritime Transport](#)

Rachel Noronha
Head of Shipping Policy



International Chamber of Shipping (China) Liaison Office

國際航運公會中國辦事處

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Ek-2

Circular to ICS Members

Subject: China Updates Regulations on International Maritime Transport

Date: 30 September 2025

We would like to inform you of recent updates to the Regulations of the People's Republic of China on International Maritime Transportation (《中华人民共和国国际海运条例》), as announced by the Xinhua News Agency on 29 September 2025. Chinese Premier Li Qiang has signed a State Council decree introducing amendments to the regulations, which officially came into effect on Sunday, 28 September 2025.

The revised regulations aim to standardize international maritime transport activities, ensure fair competition, maintain order in the international shipping market, and protect the legitimate rights and interests of stakeholders in international ocean shipping.

The key amendments are summarized below:

1. Amendment to Article 2, Paragraph 2

The second paragraph has been revised to define auxiliary business activities related to international maritime transportation as follows:

"The auxiliary business activities related to international maritime transportation mentioned in the preceding paragraph include international ship agency, international ship management, international maritime cargo loading and unloading, international maritime cargo warehousing, international maritime container station and yard services, international shipping transaction platform services, and other businesses."

2. Addition of a New Article (Article 22)

A new article has been introduced to regulate international shipping transaction platforms:

"Operators of international shipping transaction platforms shall submit information such as the operator's name, registered address, contact details, platform service agreements, and shipping transaction rules to the competent transportation department of the State Council. Specific measures shall be formulated by the competent transportation department of the State Council."

3. Addition of a New Article (Article 39)

The following penalties have been introduced for non-compliance by international shipping transaction platform operators:

"If operators of international shipping transaction platforms fail to submit the required information as stipulated, the competent transportation department of the State Council or the transportation departments of local people's governments authorized by it shall order them to complete the submission within a specified period. Failure to comply within the deadline shall result in a fine of no less than 20,000 yuan and no more than 100,000 yuan. For serious cases, they shall be ordered to cease conducting relevant business activities."

4. Amendment to Article 46 (Renumbered as Article 48)

This amendment introduces measures for addressing violations of maritime agreements and discriminatory actions:

(1) For Violations of Maritime Agreements:

"If a country or region with which the People's Republic of China has concluded or jointly participates in international maritime-related treaties or agreements violates the provisions of such treaties or agreements, thereby causing the People's Republic of China to lose or suffer damage to the benefits it enjoys under the treaty or agreement, or obstructs the realization of the objectives of the treaty or agreement, the Government of the People's Republic of China has the right to request the government of the relevant country or region to terminate the aforementioned behavior, take appropriate remedial measures, and may suspend or terminate the performance of relevant obligations under the treaty or agreement in accordance with the provisions thereof."

(2) For Discriminatory Actions:

"If any country or region adopts or assists, supports, or takes discriminatory prohibitions, restrictions, or other similar measures against operators, ships, or crew members engaged in international maritime transportation and its auxiliary businesses of the People's Republic of China, except where sufficient and effective remedies are provided by relevant treaties or agreements, the Government of the People's Republic of China shall, based on actual circumstances, take necessary countermeasures. These measures may include but are not limited to charging special fees for ships of such country or region docking at Chinese ports, prohibiting or restricting the entry and exit of such country's or region's ships from Chinese ports, and prohibiting or restricting organizations and individuals from such country or region from obtaining data, information, or conducting international maritime transportation and its auxiliary businesses related to Chinese ports."

5. Terminology Revision

The term "competent transportation department" in the regulations has been revised to "competent transportation department of the State Council."

Focus on Article 46 (Renumbered as Article 48)

The amendment to Article 46 has garnered significant attention within the maritime industry. According to authoritative sources consulted by the ICS (China) Liaison Office, this amendment is seen as a direct response to the U.S. "301 investigation" and its proposed fee imposition targeting China's maritime sector.

The U.S. "301 investigation" measures have been deemed discriminatory against Chinese shipowners and a violation of the 2003 China-U.S. Maritime Agreement, particularly Article 6, which ensures reciprocal treatment in the imposition of taxes and fees.

Under Article 6 of the agreement: *"The taxes and fees imposed by one party on the vessels of the other party shall not be less than those imposed on the vessels of a third country under similar circumstances, ensuring reciprocal treatment."*

The United States Trade Representative (USTR) has proposed additional fees targeting Chinese-manufactured ships and shipowners, which, according to authoritative sources, undermine the principles of fairness and reciprocity agreed upon in the 2003 treaty.

In response, China reserves the right to implement reciprocal punitive measures, which may include:

- Imposing additional fees on U.S. ships docking at Chinese ports.
- Restricting or prohibiting U.S.-manufactured ships from accessing Chinese ports.

These measures aim to safeguard the interests of Chinese shipowners and ensure the continued enforcement of international maritime agreements.

Conclusion

It is anticipated that the Ministry of Transport, as the competent transportation department of the State Council, will soon update its Detailed Rules for the Implementation of the Regulations on International Maritime Transportation in light of these amendments. The China Liaison Office will closely monitor the developments and keep the members updated.

Members are encouraged to review these regulatory updates and assess how they may impact current and future operations in the region. Should you have any questions or require further clarification, please do not hesitate to contact the ICS Secretariat or the ICS (China) Liaison Office.

Best regards,

Edward Liu, MH

Principal Representative

ICS (China) Liaison Office & Shanghai Representative Office