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Latest Update on Crew Change in Chinese Ports

Dear Sirs or Madam,

During the COVID-19 pandemic, crew change has become one of the greatest challenges to ship operators. It is widely recognized in the maritime industry that the regular change of seafarers is essential to keep the global trade, transport moving. IMO has issued its circular letter on 27 March, 2020 to recommend governments to grant professional seafarers and marine personnel with any necessary and appropriate exemptions from national travel or movement restrictions in order to facilitate their joining or leaving ships. The international chamber of shipping and the international transport workers' federation has issued a joint call on behalf of seafarers to governments to facilitate the essential movement of seafarers and marine personnel. As one of the major seafarer exporting countries, Chinese government has been actively responded to the international call to facilitate crew change in a safe manner with minimal risk. To help the Club/ ship operators to understand the crew change policy in Chinese ports, we prepared this circular for your kind reference.

On 2 April, 2020, the Ministry of transport issued the notice to strengthen the management of Chinese crew changeover on international navigation ships. We summarize the main contents of this Notice as below:

Implement the management responsibility on crew change

As per the notice, shipping companies and seafarers' manning agents should clearly define the management responsibility on crew change, guide the ship to effectively implement all necessary epidemic preventive measures in accordance with the latest edition of the "Guidance on the Prevention and Control of COVID-19 on board", properly arrange the necessary protective materials and life support materials for crew change, cooperate with the local government to implement the transfer, treatment, isolation, observation and other control measures, strictly control the communication activities between ship and shore side. No shore activities shall be arranged for other seafarers except those who are required for production and living and those who are in special emergency.

Prevention of overseas epidemic importation at international transportation ports

The maritime administration and transportation department shall cooperate with other port inspection units to optimize the control measures of overseas epidemic importation, establish the information notification and emergency contact mechanism, strengthen the information management of the calling ships and their crew. The transportation department shall guide the port sections to implement the control measures for ship-shore isolation, maintain the on-site crew changing in order, ensure the smooth access of crew changing vehicles to the port area so that the crew change is carried out in an orderly manner. While the vessel is at port, on duty personnel shall accurately record the crew's identity, reasons for boarding and disembarkation, contact detail as well as their close contact history, so as to make sure the traceability of all information.

Standardize the operation procedures for crew change

The notice made it clear that shipping companies and seafarers' manning agents shall carry out risk assessment on crew change. A crew change plan shall be formulated to ensure that the crew is in health condition for 14 days before their embarkation. The crew themselves shall carefully fill in the Health Record Registration Form for Sign-on Crew. Relevant materials shall be submitted to local authorities to get boarding permission. For crew members who meet the health requirements, the "point-to-point" transportation shall be adopted from their place of residence to the ship directly. In principle, there is no need for the crew to be further isolated at the locality of the port provided that the whole journey covers low-risk areas only and proper epidemic prevention and control measures are implemented.

For the sign-off crew, the shipping companies and seafarers' manning agents shall formulate a crew disembarkation plan. Crew shall fill in the Registration Form of Crew on-board Isolation Health Record. Relevant materials shall be submitted to local competent authorities. The vessel intended to enter the Chinese port for operation shall report the crew health information to the maritime administration 48 hours prior to its ETA. When the voyage is less than 48 hours, the vessel shall report immediately after leaving the previous port. If the voyage from the last berthing point outside the territory to the domestic port is more than 14 days and the Registration Form of Crew on-board Isolation Health Record shows the crew member's health condition is normal, they can go through the entry procedures and disembark after passing the customs health quarantine. If the voyage is less than 14 days and the Registration Form of Crew on-board Isolation Health Record shows the crew member's health condition is normal, they can go through the entry procedures and disembark after passing the customs health quarantine and they should stay under quarantine observation at home or at a designated place according to the requirements of the local people's government at the place of entry to complete the 14 days' isolation. If the Registration Form of Crew On-board Isolation Health Record

shows the crew member's health condition is abnormal or there is any abnormal health condition in the process of disembarking or during the customs health quarantine, the crew change shall be suspended immediately and be treated according to the epidemic prevention and control requirements. For crew member's that is diagnosed as asymptomatic case, measures shall be taken in accordance with the relative national regulations.

The sign-off crew shall strictly abide by the relevant isolation requirements during the isolation observation period. During isolation period, they shall report their health conditions to shipping companies or manning agents on a daily basis. Local epidemic prevention policy should be followed if they need to go to other cities in China after the 14 days' isolation. Shipping companies or manning agents shall be responsible for reporting the relevant information to the local health department and shall be responsible for cooperating with the health management for the sign-off seafarers.

Although the Ministry of Transport has published this Notice to keep crew change in Chinese ports on track, as per our understanding from our local offices, there are still obstacles need to be overcome in practice:

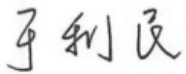
Strict protective measures implemented by local port authorities are still effective in some ports. For example, as per our latest understanding, outside parties are still not allowed to enter into **Luoyuan** port (Fuzhou) at this moment.

Except for the requirements in the Notice, additional restrictions may be adopted by local authorities for crew change. For example, some ports may require that the crew change must be carried out in daytime, or the crew change could only be carried out at the first Chinese port of call. In **Zhoushan**, the local authority announced that only crew of Zhoushan citizenship could disembark at the port.

Complicated procedures implemented by different authorities. We understand from local agents that even if all the above written requirements have been fulfilled, there is still much paperwork need to be done to meet the requirements of local health department, epidemic prevention special working group, frontier inspection, port authority and so on.

So far, in **Zhoushan, Shanghai, Haimen**, we have heard some successful crew change cases. To our knowledge, with the spread of the global COVID-19, the Ministry of Transport is now working on improving the crew changing system to face the trend of long-term epidemic prevention. If Owners/ ship operators face any difficulty during crew change in Chinese ports, please feel free to contact us and we shall take our strength to assist.

Best regards,



Yu Limin

President