

**Report of the 2025 Concentrated Inspection Campaign (CIC)
on Ballast Water Management**

EXECUTIVE SUMMARY

From 1 September 2025 to 30 November 2025, the Black Sea MoU carried out a Concentrated Inspection Campaign (CIC) on Ballast Water Management. The campaign was carried out by the Member Authorities of the Black Sea MoU that have ratified the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (BWM Convention). The CIC was conducted in conjunction with the Paris and the Tokyo Memoranda. This campaign was conducted under the campaign coordination of the Maritime Administration of Türkiye. The Guidelines and Questionnaires jointly developed by the Paris and Tokyo Memoranda were used throughout the campaign.

The CIC applied to all ships and each ship was subjected to only one CIC inspection during the campaign period. Over the course of the campaign, a total of 775 inspections were carried out by the member Authorities of the BS MoU which are a party to the BWM Convention, covering 736 individual ships. Among these, 624 inspections were conducted using the CIC questionnaire. During the CIC, 76 ships were detained in total. Of which, 52 detentions were the result of inspections with CIC questionnaires and 16 of them were detained directly attributed to CIC-related deficiencies.

A total of 59 questionnaires recorded at least one non-compliance response, representing 9.46 per cent of CIC inspections. The overall average rate of non-compliances was 1.51%, reflecting the proportion of the “unsatisfactory” answers in relation to all applicable questionnaire responses.

The analysis indicates that non-conformities identified during the CIC were largely focused on a limited number of areas, with approximately 89.3% of all recorded non-compliances relating to three specific questionnaire items: the operational condition of Ballast Water Management Systems (BWMS), the proper completion of the Ballast Water Record Book (BWRB), and crew familiarization with the Ballast Water Management Plan (BWMP). Among these, BWMS operability emerged as the most significant area of concern, accounting for the highest number of non-conformities and the largest share of CIC related detentions.

The majority of CIC inspections were bulk carriers with 214 inspections (34.3%), followed by general cargo/multi-purpose ships with 213 inspections (34.1%), oil/chemical tankers with 74 inspections (11.9%) and oil tankers with 68 inspections (10.9%), which comprises 569 total CIC inspections with a rate of 91.2%. CIC-related detentions in the Region were observed in general cargo/multipurpose ships (8 detentions), bulk carriers (7 detentions) and one container ship.

During the campaign, vessels registered under the flags of 46 different States were inspected under the CIC scope. The highest numbers of inspections were conducted on ships registered under the flags of Panama with 117 inspections (18.8%), Liberia with 97 inspections (15.5%) and the Marshall Islands with 43 inspections (6.9%). CIC related detentions involved ships flying the flags of Barbados (3), Belize (1), Liberia (2), Palau (1), Panama (3), Saint Kitts and Nevis (4), Tanzania (1), and Vanuatu (1).

The findings further indicate that vessels aged between 15 and 25 years accounted for the majority of CIC related detentions. In addition, ships classified as High Risk Ships (HRS) recorded substantially higher non-conformity rates than Standard and Low Risk Ships. These results confirm the effectiveness of the BS MoU Ship Risk Profile System in identifying sub-standard vessels and support the continued application of a risk-based inspection approach.

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1 INTRODUCTION

1.1 Purpose of the report

This report documents the results of the Concentrated Inspection Campaign (CIC) on Ballast Water Management (BWM), carried out by BS MoU Member Authorities that have ratified the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (BWM Convention) between 1 September and 30 November 2025; which was conducted in conjunction with the Paris and Tokyo Memoranda.

1.2 Objective of the CIC

The objective of the CIC was to verify compliance with the mandatory requirements of the BWM Convention and to enhance awareness among shipowners, operators, and seafarers regarding key ballast water management obligations.

1.3 Scope of the CIC

The campaign targeted to examine proper certification in accordance with the BWM Convention; approval and update of the Ballast Water Management Plan (BWMP); crew familiarisation in the implementation of the BWMP; Ballast Water Management System approval and its operation; Records of Ballast Water Record Book (BWRB); Ballast water sediment management; and Valid exemptions, if any.

Is a valid International Ballast Water Management Certificate (IBWMC) on board?
Is the approved Ballast Water Management Plan (BWMP) on board?
Is the BWMP up to date to reflect the applicable requirements to manage Ballast Water as required by the Convention?
Are officers and crew familiar with their duties in the implementation of the BWMP?
Is the Ballast Water Management System (BWMS) approved by the Administration/Organization, as appropriate?
Is the BWMS operational?
Is the Ballast Water managed according to the BWMP?
Is the Ballast Water Record Book (BWRB) properly filled, including exemptions if granted?
Is the crew managing ballast water sediments in accordance with the BWMP?
If an exemption has been granted, are the conditions of exemption implemented?

1.4 General remarks

This report presents an analysis of the responses to the CIC Questionnaire submitted during the campaign period. Thereby, for the purpose of this report:

- *Inspection: An inspection with a completed CIC Questionnaire with an applicable response (Except Table 1);*
- *Non-compliant response:* a "NO" response to any of the questions 1-10 which indicates non-compliance to a requirement in the questionnaire;
- *CIC inspection with a non-compliant response:* Questionnaire with at least one "NO" response to any question 1-10;
- *CIC Detention:* CIC-topic related detention which is indicated by a "Detention" response to any question; and
- *Total applicable responses:* Total number of "YES - Compliant" plus "NO - Non-compliant" answers to the questions. "N/A" responses filtered out from the result.

2 SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

2.1 Summary

During the campaign, a total of 775 inspections were carried out by the member Authorities of the BS MoU which are a party to the BWM Convention, covering 736 individual ships. 624 of them were carried out with the CIC questionnaire. Only one CIC inspection was carried out on board an individual vessel. This shows that the Regional CIC questionnaire submission rate is 84.78%.

The results of the CIC show that a total of 84 non-compliant responses were recorded. 59 CIC inspections contained at least one non-compliant response and 16 ships were detained as a direct result of CIC inspections.

The main findings of the CIC are summarised as follows:

- .1 A total of 59 questionnaires had at least one non-compliant response, which resulted in 9.46 per cent of CIC inspections not conforming to the requirements set out in the questionnaire.
- .2 A total of 84 non-compliant responses was recorded. The overall average of non-compliant responses to total applicable responses was 1.51%.
- .3 During the campaign, a total of 76 vessels were detained. Of these, 52 detentions followed inspections conducted with CIC questionnaires and 16 detentions were directly related to CIC deficiencies, resulting in a CIC topic related detention rate of 2.56%.
- .4 A total of 214 (34.3%) CIC inspections concerned bulk carriers, followed by general cargo/multi-purpose ships with 213 (34.1%) inspections, oil/chemical tankers with 74 (11.9%) and oil tankers with 68 (10.9%) inspections, which comprises 569 (91.2%) total CIC inspections.
- .5 CIC related detentions in the Region were recorded for general cargo/multipurpose ships (8 detentions), bulk carriers (7 detentions), and one container ship.
- .6 Vessels from 46 different States were inspected under the CIC scope. Most CIC inspections were carried out on board ships flying the flags of Panama with 117 inspections (18.8%), Liberia with 97 inspections (15.5%) and the Marshall Islands with 43 inspections (6.9%).
- .7 A total of 27 flags, representing 24.32% of CIC inspections with 111 CIC inspections, recorded no non-compliant responses, particularly; Türkiye with 20 inspections, Sierra Leone with 15 inspections and Hong Kong, China with 10 inspections.
- .8 CIC related detentions in the Region involved ships flying the flags of Saint Kitts and Nevis (4), Barbados (3), Panama (3), Liberia (2), Tanzania, Vanuatu, Belize, and Palau.
- .9 No non-compliant CIC inspections were recorded for ships aged 0–10 years and no CIC related detentions were observed for ships aged over 35 years.
- .10 Ships aged between 15 and 25 years accounted for more than half of the non-compliant responses and 62.5% of CIC-related detentions.
- .11 Full compliance was observed for Questions 1, 2, 5, and 9 which means no non-compliances were observed for these questions and a very high level of compliances were observed for Questions 3 and 7 with over 99% 'YES' answers.

- .12 There were 41 instances that an exemption had been granted. 3 of them (7.3%) had non-compliances, 2 of which resulted in detainable deficiencies.
- .13 The most unfavourable results (89.3% of all non-compliances) were recorded in responses to Questions 4, 6 and 8 which asked:

Question 6: Is the BWMS operational? (38.1%);

Question 8: Is the Ballast Water Record Book (BWRB) properly filled including exemptions if granted? (34.5%); and

Question 4: Are officers and crew familiar with their duties in the implementation of the BWMP? (16.7%).

- .14 A breakdown of major non-compliant responses as indicated by “NO” answers has been studied concerning ship flag, ship type and ship age. Findings are presented in Section 4.6 below.

2.2 Conclusions

The CIC results indicate a very high level of compliance with certification, approval of the BWM Plan and BWM System, and ballast water sediment management. Nevertheless, the CIC related detention rate of 2.56% highlights the need for continued attention to certain operational and procedural requirements.

In particular, the results suggest that further improvements are required in relation to the implementation of exemption conditions, proper completion of the Ballast Water Record Book, operational reliability of the Ballast Water Management System, and crew familiarization with BWMP procedures.

2.3 Recommendations

Although the overall results of the CIC were considered satisfactory, non-compliance in key areas of ballast water management continues to present potential environmental risks.

It is therefore recommended that:

1. basic findings of the report, including the analysis of the responses to the questionnaire and breakdown of major non-compliances by ship flag, ship type, and ship age, to be submitted to the IMO III Sub-Committee;
2. PSC Officers continue to be encouraged to complete CIC questionnaires during routine PSC inspections, as appropriate;
3. increased attention be given to older ships and ships classified as High Risk Ships; and
4. continue to put emphasis on the vital requirements of the BWM Convention when performing PSC inspections, particularly the requirements that raised the most concern in the CIC:
 - a. the operational condition of the Ballast Water Management System;
 - b. the proper completion of the Ballast Water Record Book;
 - c. crew familiarization with the implementation of the Ballast Water Management Plan; and
 - d. compliance with exemption conditions.

It is further recommended that the industry pay greater attention to strengthening its efforts to ensure full compliance with the requirements of the BWM Convention, including through technical dialogues with Flag States, Port States and Coastal States, as well as with relevant intergovernmental organizations, with a view to supporting improvements in fleet technical standards and overall compliance with the BWM Convention.

3 CIC QUESTIONNAIRE RESULTS

3.1 General

The total number of inspected ships and the total number of inspections performed during the CIC are presented in **Table 1**.

Table 1 Summary of inspections during the CIC

	No. of individual ships inspected during CIC	No. of inspections with a CIC questionnaire	No. of inspections without CIC questionnaire
Total	736	624	112
Total number of detentions	76	52	24
Detentions with CIC-topic deficiencies	16	16	-

Looking at the number of inspections performed with a CIC questionnaire (Column 2 of Table 1), the percentage of detentions that were CIC-topic related amounts to:

2.56%

3.2 CIC Questions

The responses to the CIC questionnaire are summarised in **Table 2** below. In order to analyse results on an individual question basis, all Not Applicable (N/A) and Blank responses are filtered for the percentage of compliance and noncompliance responses.

Table 2 Responses to CIC questionnaire

	YES		NO		N/A		Detention	
	Nr	%	Nr	%	Nr	%	Nr	%
Q1	616	100.0%	0	0.0%	8	1.3%	0	0.0%
Q2	617	100.0%	0	0.0%	7	1.1%	0	0.0%
Q3	614	99.5%	3	0.5%	7	1.1%	1	0.2%
Q4	603	97.7%	14	2.3%	7	1.1%	9	1.4%
Q5	613	100.0%	0	0.0%	11	1.8%	0	0.0%
Q6	579	94.8%	32	5.2%	13	2.1%	11	1.8%
Q7	610	99.5%	3	0.5%	11	1.8%	0	0.0%
Q8	584	95.3%	29	4.7%	11	1.8%	0	0.0%
Q9	609	100.0%	0	0.0%	15	2.4%	0	0.0%
Q10	38	92.7%	3	7.3%	583	93.4%	2	0.3%

Breakdown CIC inspections, inspections with nonconformities to the requirements set out in the questionnaire, the average percentage of nonconformities, number of unfavourable responses/nonconformities and CIC topic related detentions by ship type, ship age, ship flag and ship risk profiles presented in **Section 4.2 - Section 4.5** of this report. The breakdowns of the major nonconformities by ship flag, ship type and ship age are presented in **Section 4.6**. The comparison of questions with non-compliant responses is set out in **Section 4.7**.

4 DETAILED ANALYSIS OF CIC INSPECTION DATA

4.1 Inspection summary during CIC Period

During the campaign, a total of 76 vessels were detained. **Table 3** provides an overview of inspections that resulted in detentions during the campaign period. Of the 76 detentions recorded, 52 resulted from inspections conducted using the CIC questionnaire. Based on the outcomes of the questionnaire, 23 non-compliant responses were considered as ground for detention, leading to the detention of 16 ships as a direct result of the campaign.

Accordingly, CIC-topic related detentions represented 21.05% of the total PSC detentions recorded during the campaign. When compared to the total number of CIC inspections, the overall detention rate directly related to CIC topics amounted to 2.56%.

Table 3 Inspection summary during CIC period

Total PSC Inspections	775
Nr. of PSC Inspections for individual vessels	736
Total PSC of Detentions	76
Inspections CIC-topic related	624
Detainable deficiencies CIC-topic related	33
Detentions with CIC-topic related deficiencies	16
% of Detentions with CIC-topic related deficiencies to Inspections CIC-topic related	2.56
% of Detentions with CIC-topic related deficiencies to Total PSC of Detentions	21.05
% of Detentions with CIC-topic related deficiencies to Total PSC Inspections for individual vessels	2.17

4.2 Analyses by ship flag

The following **Table 4** presents the results of the CIC by the ship flag. A total of 624 individual ships flying the flags of 46 different Administrations were subjected to CIC inspections during the campaign.

Table 4 Results by ship flag

Ship Flag	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non-compliances	% of non-compliance	% total non-compliances	CIC topic related detentions	% CIC topic related detentions
Antigua and Barbuda	8	2	25.00	73	3	4.11	3.57	0	0.00
Aruba (NL)	1	0	0.00	9	0	0.00	0.00	0	0.00
Bahamas	2	0	0.00	18	0	0.00	0.00	0	0.00
Barbados	31	4	12.90	281	7	2.49	8.33	3	9.68
Belize	17	3	17.65	153	6	3.92	7.14	1	5.88
Cameroon	13	1	7.69	98	1	1.02	1.19	0	0.00
China	5	1	20.00	47	1	2.13	1.19	0	0.00
Comoros	10	1	10.00	89	1	1.12	1.19	0	0.00
Cook Islands	3	0	0.00	27	0	0.00	0.00	0	0.00
Cyprus	1	0	0.00	10	0	0.00	0.00	0	0.00
Denmark	2	0	0.00	10	0	0.00	0.00	0	0.00
Dominica	3	0	0.00	27	0	0.00	0.00	0	0.00
Egypt	2	0	0.00	18	0	0.00	0.00	0	0.00
Gabon	1	0	0.00	9	0	0.00	0.00	0	0.00
Gambia	7	1	14.29	63	1	1.59	1.19	0	0.00
Gibraltar (GB)	1	0	0.00	9	0	0.00	0.00	0	0.00
Greece	8	0	0.00	72	0	0.00	0.00	0	0.00
Guinea	2	2	100.00	18	3	16.67	3.57	0	0.00
Guinea-Bissau	3	1	33.33	27	1	3.70	1.19	0	0.00
Hong Kong, China	10	0	0.00	91	0	0.00	0.00	0	0.00
Isle of Man (GB)	1	0	0.00	9	0	0.00	0.00	0	0.00
Liberia	97	7	7.22	878	11	1.25	13.10	2	2.06
Malawi	1	0	0.00	9	0	0.00	0.00	0	0.00
Malta	36	1	2.78	323	1	0.31	1.19	0	0.00
Marshall Islands	43	3	6.98	392	4	1.02	4.76	0	0.00
Mongolia	1	0	0.00	4	0	0.00	0.00	0	0.00
Mozambique	2	1	50.00	18	1	5.56	1.19	0	0.00
Nauru	1	0	0.00	9	0	0.00	0.00	0	0.00
Netherlands	1	0	0.00	9	0	0.00	0.00	0	0.00
Norway	1	0	0.00	9	0	0.00	0.00	0	0.00
Oman	3	0	0.00	27	0	0.00	0.00	0	0.00
Palau	35	7	20.00	314	8	2.55	9.52	1	2.86
Panama	117	11	9.40	1,062	16	1.51	19.05	3	2.56
Portugal	6	0	0.00	54	0	0.00	0.00	0	0.00
Russian Federation	23	2	8.70	206	2	0.97	2.38	0	0.00
Saint Kitts and Nevis	39	7	17.95	342	12	3.51	14.29	4	10.26

Table 14 Results by ship flag (continue)

Ship Flag	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non-compliances	% of non-compliance	% total non-compliances	CIC topic related detentions	% CIC topic related detentions
Saint Vincent and the Grenadines	8	0	0.00	72	0	0.00	0.00	0	0.00
San Marino	3	0	0.00	27	0	0.00	0.00	0	0.00
Sierra Leone	15	0	0.00	136	0	0.00	0.00	0	0.00
Singapore	6	0	0.00	54	0	0.00	0.00	0	0.00
Tanzania, United Republic of	12	2	16.67	82	2	2.44	2.38	1	8.33
Togo	4	0	0.00	28	0	0.00	0.00	0	0.00
Türkiye	20	0	0.00	181	0	0.00	0.00	0	0.00
Tuvalu	5	0	0.00	45	0	0.00	0.00	0	0.00
United Kingdom	1	0	0.00	9	0	0.00	0.00	0	0.00
Vanuatu	13	2	15.38	119	3	2.52	3.57	1	7.69
TOTAL	624	59	9.46	5,567	84	1.51	100.00	16	2.56

The highest numbers of inspections were conducted on ships flying the flags of Panama (117 inspections; 18.75%), Liberia (97 inspections; 15.54%), and the Marshall Islands (43 inspections; 6.89%). A total of 19 flag Administrations had one or more non-compliance responses to the questionnaire, the remaining flags, representing 24.32% of the total CIC inspections, had no non-compliance responses.

The top 5 Flags in terms of the number of CIC inspections with non-compliant responses were Panama (11 non-compliances; 9.40%), Liberia (7; 7.22%), Palau (7; 20.00%), Saint Kitts and Nevis (7; 17.95%), and Barbados (4; 12.90%).

During the three-month campaign period, detentions for CIC related deficiencies were linked to Barbados, Belize, Liberia, Palau, Panama, Saint Kitts and Nevis, Tanzania, and Vanuatu.

Flags with more than 10 CIC inspections and no recorded non-compliances included Hong Kong (China), Sierra Leone, and Türkiye which demonstrated a high level of compliance with the CIC requirements.

4.3 Analyses by Ship types

The following **Table 5** presents the results of the CIC by ship type. A total of 214 (34.3%) CIC inspections concerned bulk carriers, followed by general cargo/multi-purpose ships with 213 (34.1%) inspections, oil/chemical tankers with 74 (11.9%) and oil tankers with 68 (10.9%) inspections. Together, these ship types represented 569 CIC inspections, corresponding to 91.2% of the total.

Table 5 Results by ship types

Ship Type	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non-compliances	% of non-compliance	% total non-compliances	CIC topic related detentions	% CIC topic related detentions
Bulk carrier	214	23	10.75	1,945	33	1.70	39.29	7	3.27
Container Ship	33	3	9.09	297	4	1.35	4.76	1	3.03
Gas carrier	6	-	-	54	-	-	-	-	-
General cargo/multipurpose	213	25	11.74	1,886	37	1.96	44.05	8	3.76
Livestock carrier	4	-	-	4	-	-	-	-	-
Oil tanker	68	4	5.88	614	4	0.65	4.76	-	-
Oil tanker/Chemical tanker (OILCHEM)	74	3	4.05	668	5	0.75	5.95	-	-
Passenger ship	1	-	-	9	-	-	-	-	-
Ro-Ro cargo	8	1	12.50	63	1	1.59	1.19	-	-
Ro-Ro passenger ship	3	-	-	27	-	-	-	-	-
TOTAL	624	59	9.46	5,567	84	1.51	100.00	16	2.56

Non-compliant responses were recorded on general cargo/multi-purpose ships with 25 responses (42.37% of non-compliance), bulk carriers with 23 responses (38.98%), oil tankers with 4 responses, container ships (6.78%), oil/chemical tankers with 3 responses each (5.08% each) and Ro-Ro cargo ships with 1 response (1.69%).

During the campaign period, CIC related detentions were recorded for general cargo/multi-purpose ships (8), bulk carriers (7), and one container ship.

4.4 Analyses by ship age

By ship age, higher non-compliance rates were generally observed among older ships. Ships aged 35 years and above recorded 13 non-compliant inspections (17.57%), followed by ships aged 25–29 years with 10 non-compliant inspections (12.82%), ships aged 21–24 years with 13 non-compliant inspections (10.00%), and ships aged 16–20 years with 15 non-compliant inspections (9.93%).

With regard to CIC related detentions, no non-compliant CIC inspections were recorded for ships aged 0–10 years. In addition, while no CIC related detentions were observed for ships aged over 35 years, this age group accounted for 22.03% of CIC inspection with non-compliant responses were identified. By contrast, ships aged between 15 and 25 years accounted for 62.5% of all CIC related detentions. This age group may therefore warrant increased attention during future inspections. Results by ship age are presented in **Table 6** below.

Table 6 Results by ship age

Ship Age	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non-compliances	% of non-compliance	% total non-compliances	CIC topic related detentions	% CIC topic related detentions
0-5	22	-	-	198	-	-	-	-	-
6-10	31	-	-	279	-	-	-	-	-
11-15	77	4	5.19	693	6	0.87	7.14	1	1.30
16-20	151	15	9.93	1,358	22	1.62	26.19	6	3.97
21-24	130	13	10.00	1,169	21	1.80	25.00	4	3.08
25-29	78	10	12.82	682	13	1.91	15.48	3	3.85
30-34	61	4	6.56	540	8	1.48	9.52	2	3.28
35+	74	13	17.57	607	14	2.31	16.67	-	-
TOTAL	624	59	9.46	5,526	84	1.52	100.00	16	0.03

4.5 Analyses by ship risk group

The results of the CIC analysed in accordance with the Ship Risk Groups are provided in **Table 7** below.

Table 7 CIC inspection data by ship risk groups

SHIP RISK PROFILE	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% of non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non-compliances	% of non-compliance	% total non-compliances	CIC topic related detentions	% CIC topic related detentions
HRS	103	14	13.59	879	18	2.05	21.43	4	3.88
SRS	427	39	9.13	3,835	56	1.46	66.67	10	2.34
LRS	94	6	6.38	853	10	1.17	11.90	2	2.13
TOTAL	624	59	9.46	5,567	84	1.51	100.00	16	3

The analysis indicates that High Risk Ships recorded a significantly higher non-compliance rate of 13.59%, compared with Standard and Low Risk Ships, 9.13% and 6.38%, respectively. This result provides further support for the effectiveness of the BS MoU Ship Risk Profile System in identifying sub-standard ships for inspection.

4.6 Analyses of the major non-compliances

This section presents an analysis of the major non-compliances identified during the CIC, with a breakdown by ship flag, ship type and ship age. The analysis focuses on Questions 4, 6, and 8 of the CIC questionnaires, which recorded 14, 32, and 29 unsatisfactory responses, respectively. Collectively, these three questions accounted for 89.3% of all non-compliant responses recorded during the campaign.

Question 6 Is the BWMS operational?

Of the 611 applicable inspections, 32 inspections recorded unsatisfactory responses, corresponding to a non-compliance rate of 5.2%. The analysis confirms that BWMS operability represents the most critical area of non-compliance under this CIC, accounting for 38.1% of all non-conformities.

Unsatisfactory responses to this question were a significant contributing factor to CIC related detentions, with 11 detentions directly linked to deficiencies associated with the operational condition of the BWMS. These findings underscore the importance of verifying the actual operational performance of BWMS during inspections.

The highest numbers of unsatisfactory responses were observed on ships flying the flags of Panama (7) and Liberia (6). Half of the unsatisfactory responses were recorded on bulk carriers, followed by general cargo/multi-purpose ships (13).

A detailed breakdown of the non-compliances to **Question 6** by ship flag, ship type and ship age is presented below.

Ship Flag	Nr. of CIC inspections	Nr. of non-compliances	% of non-compliance	% total non-compliances
Panama	117	7	5.98	21.88
Liberia	97	6	6.19	18.75
Barbados	31	3	9.68	9.38
Marshall Islands	43	3	6.98	9.38
Saint Kitts and Nevis	39	3	7.69	9.38
Others	297	10	3.37	31.25
TOTAL	624	32	5.13	100.00

Ship Type	Nr. of CIC inspections	Nr. of non-compliances	% of non-compliance	% total non-compliances
Bulk carrier	214	16	7.48	50.00
General cargo/multipurpose	213	13	6.10	40.63
Oil/Chemical tanker	74	2	2.70	6.25
Oil tanker	68	1	1.47	3.13
TOTAL	624	32	5.13	100.00

Ship Age	Nr. of CIC inspections	Nr. of non-compliances	% of non-compliance	% total non-compliances
16-20	151	12	7.95	37.50
21-24	130	8	6.15	25.00
25-29	78	5	6.41	15.63
Others	265	7	2.64	21.88
TOTAL	624	32	5.13	100.00

Question 8 Is the Ballast Water Record Book (BWRB) properly filled including exemptions if granted?

Of the 613 applicable inspections, 29 inspections recorded unsatisfactory responses to this question, corresponding to a non-compliance rate of 4.7%. Deficiencies related to the proper completion of the Ballast Water Record Book accounted for 34.5% of all non-conformities recorded during the campaign.

A notable proportion of these deficiencies were identified on ships aged over 35 years, suggesting that older vessels may face greater challenges in maintaining administrative compliance with BWM requirements.

The majority of unsatisfactory responses were observed on ships flying the flags of Panama (5), Saint Kitts and Nevis (4), and Palau (4).

A detailed breakdown of the non-compliances to **Question 8** by ship flag, ship type and ship age is presented below.

Ship Flag	Nr. of CIC inspections	Nr. of non-compliances	% of non-compliance	% total non-compliances
Panama	117	5	4.27	17.24
Palau	35	4	11.43	13.79
Saint Kitts and Nevis	39	4	10.26	13.79
Belize	17	2	11.76	6.90
Guinea	2	2	100.00	6.90
Liberia	97	2	2.06	6.90
Others	317	10	3.15	34.48
TOTAL	624	29	4.65	100.00

Ship Type	Nr. of CIC inspections	Nr. of non-compliances	% of non-compliance	% total non-compliances
General cargo/multipurpose	213	12	5.63	41.38
Bulk carrier	214	9	4.21	31.03
Container Ship	33	3	9.09	10.34
Others	164	5	3.05	17.24
TOTAL	624	29	4.65	100.00

Ship Age	Nr. of CIC inspections	Nr. of non-compliances	% of non-compliance	% total non-compliances
35+	74	10	13.51	34.48
21-24	130	7	5.38	24.14
16-20	151	4	2.65	13.79
Others	269	8	2.97	27.59
TOTAL	624	29	4.65	100.00

Question 4 Are officers and crew familiar with their duties in the implementation of the BWMP?

Out of 617 applicable inspections, 14 of them recorded unsatisfactory responses to this question, corresponding to a non-compliance rate of 2.3% and representing 16.7% of all non-compliant responses. Of these unsatisfactory responses, nine were considered detainable deficiencies.

The results indicate that crew familiarisation with the implementation of the Ballast Water Management Plan remains an area requiring continued attention. Among the unsatisfactory responses, 3 were identified on board ships flying the flag of Barbados (9.7%), while half of the unsatisfactory responses were recorded on general cargo/multi-purpose ships.

A detailed breakdown of the non-compliances to **Question 4** by ship flag, ship type and ship age is presented below.

Ship Flag	Nr. of CIC inspections	Nr. of non-compliances	% of non-compliance	% total non-compliances
Barbados	31	3	9.68	21.43
Palau	35	2	5.71	14.29
Panama	117	2	1.71	14.29
Saint Kitts and Nevis	39	2	5.13	14.29
Others	402	5	1.24	35.71
TOTAL	624	14	2.24	100.00

Ship Type	Nr. of CIC inspections	Nr. of non-compliances	% of non-compliance	% total non-compliances
General cargo/multipurpose	213	7	3.29	50.00
Bulk carrier	214	4	1.87	28.57
Container Ship	33	1	3.03	7.14
Oil tanker	68	1	1.47	7.14
Oil/Chemical tanker	74	1	1.35	7.14
TOTAL	624	14	2.24	100.00

Ship Age	Nr. of CIC inspections	Nr. of non-compliances	% of non-compliance	% total non-compliances
16-20	151	4	2.65	28.57
21-24	130	3	2.31	21.43
25-29	78	3	3.85	21.43
Others	265	4	1.51	28.57
TOTAL	624	14	2.24	100.00

4.7 Comparison of the recorded deficiencies

Difference between the non-compliant responses to the CIC topic requirements and the recorded deficiencies indicated in the CIC Guidelines presented below **Table 8**.

Table 8 Questions non-compliant responses and recorded deficiencies, detentions

Question	Deficiency Code	Nature of Deficiency	Nr. of NO response to this question	Nr. of CIC inspection with this deficiency	Number of this CIC Deficiency	Nr. of this CIC detainable deficiency	Number of CIC inspection with detention including this detainable deficiency	Nr. of RO Related this CIC detainable deficiency
Q1	01136	Ballast Water Management Certificate	0	1	0	0	0	0
Q2	14801	Ballast Water Management Plan	1	11	0	1	0	0
Q3					3			
Q4	14806	Crew Training and familiarization	10	14	14	10	0	0
Q5	14812	Ballast Water Management System - Approval by Administration	0	0	0	0	0	0
Q6	14811	Ballast Water Management System	15	47	32	14	2	0
Q7	14813	Ballast Water Management Plan - Implementation	0	4	3	0	0	0
Q8	14802	Ballast Water Record Book	1	41	29	1	0	0
Q9	14805	Sediment removal and disposal	0	0	0	0	0	0
Q10	14809	Conditions for exemptions	2	3	3	2	0	0