CAPITAL REGISTER OF SHIPPING

Technical Information

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POLICY ON BALLAST WATER MANAGEMENT CONVENTION, 2004 (BWMC) FOR COMOROS-FLAGGED VESSELS

Reference: Union of Comoros Maritime Administration Circular Ref. No. 26/05140/COM, Dated 05 October 2026

To: All Owners/Managers, Deputy Registrars, Classification Societies, Recognized Organizations and Port State Control Officers concerned with Comoros-flagged vessels

The Maritime Administration of the Union of Comoros has issued a Circular establishing the procedures for surveys, certification and compliance with the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (BWM Convention) for vessels flying the Comoros flag. This Technical Note highlights the key requirements and the actions expected from Owners/Managers and Recognized Organizations.

1. Scope and Applicability

The Circular applies to all ships, including submersibles, floating craft, floating platforms, FSUs and FPSOs, as applicable under the BWM Convention. Ships subject to the Convention shall maintain, as applicable, an approved Ballast Water Management Plan (BWMP), a Ballast Water Record Book and the applicable International Ballast Water Management Certificate (IBWMC) or other document required under the Convention. Ships of 400 GT and above shall carry the IBWMC on board together with the approved BWMP and Ballast Water Record Book.

Mobile offshore units, including Mobile Offshore Drilling Units, are to be surveyed and certified in accordance with Regulations E-1 and E-2 of the BWM Convention and relevant IMO circulars. Ballast Water Management Systems (BWMS) type-approved by another Administration may be accepted, provided the type approval complies with the applicable IMO requirements and resolutions. Ships operating to ports or waters under United States jurisdiction shall also comply with the applicable United States Coast Guard (USCG) requirements, including BWMS acceptance requirements.

NOTES:

- This Technical Note has been prepared to keep readers informed of current developments and is offered for general guidance purposes only.
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2. Ballast Water Management Plan (BWMP)

The BWMP shall be submitted by the Shipowner/Manager to a Recognized Organization (RO) authorized by the Administration for evaluation and approval in accordance with Regulation B-1 of the BWM Convention. The RO shall approve the BWMP in line with the Convention and IMO guidelines, and **a copy of the approved BWMP shall be maintained on board** and made available for inspection.

Where a vessel is fitted with a BWMS, or an existing BWMS is modified or replaced, the BWMP shall be reviewed, amended as necessary and submitted to the RO for approval. BWMPs previously approved in accordance with applicable IMO requirements remain valid unless revision is required due to changes to the vessel, the BWMS or applicable requirements.

3. Certification, Surveys and Exemptions

Ships of 400 GT and above subject to the BWM Convention shall undergo the applicable surveys in accordance with Regulation E-1. After satisfactory completion of the initial or renewal survey, the authorized RO may issue a Short-Term Certificate and shall submit the survey report, approved BWMP and a copy of the Short-Term Certificate to the Administration for review and record. Annual and intermediate surveys are to be carried out by the duly authorized RO, which may endorse the Certificate following satisfactory completion.

- **Full-Term IBWMC:** the RO may issue it on behalf of the Union of Comoros only after the Administration has acknowledged the survey documentation and given its authorization. Before requesting authorization, the RO shall ensure that the approved BWMP, Short-Term Certificate, survey report and any other documentation required by the Administration are available. A copy of the issued certificate shall be provided to the Administration.
- **Exemptions and dispensations:** any exemption, dispensation, relaxation or deviation is granted exclusively by the Maritime Administration. ROs have no authority to grant them unless expressly authorized in writing for a specific case. Requests shall be submitted with technical justification, supporting documents and RO recommendations, and the RO shall implement only after formal written authorization.

Item	**Requirement**
Onboard documents (400 GT and above)	IBWMC, approved BWMP and Ballast Water Record Book
Short-Term Certificate	Issued by the authorized RO after satisfactory initial or renewal survey; copy to be sent to the Administration with the survey report and approved BWMP
Full-Term Certificate	Only after the Administration's acknowledgement and authorization; fee as determined by the Administration
Exemptions / dispensations	Administration only; RO may act solely on specific written authorization for the case

Item	Requirement
Flag contact	Technical Department (PIC: Ayaz Burud) – info@comorosmaritime.org; Tel (office hours): +2697739779; Emergency: +2693437145

4. Recommended Actions

Owners/Managers should circulate the Circular to shore and shipboard staff and ensure that each vessel holds the BWMP, Ballast Water Record Book and, where applicable, the IBWMC. Where a BWMS is installed, modified or replaced, the revised BWMP should be submitted to the RO for approval, and ships trading to US waters should confirm USCG BWMS acceptance requirements. ROs should obtain the Administration's acknowledgement and authorization before issuing any Full-Term Certificate, immediately notify the Administration of any serious deficiency, non-compliance or condition that may affect certificate validity, and refer all exemption requests to the Administration. Nothing in the Circular transfers the Administration's exclusive authority to grant exemptions or dispensations to an RO.

For clarification on any of the above, please reach out to:

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