



ACRISURE®

Client Circular

Date: March 17, 2026

Ref: 2026/02

Subject: Washington State COFR Requirements — Updated April 15, 2026

Dear Valued Clients,

Washington State has updated its Certificate of Financial Responsibility (COFR) requirements for foreign-flagged vessels entering Washington State waters. These changes are part of the newly adopted Chapter 173-187 WAC – Financial Responsibility, effective July 15, 2024, and vessels must comply by April 15, 2026. ([Washington State Department of Ecology](#))

The goal of the State COFR program is to ensure that vessel owners/operators have *adequate financial resources* to pay for cleanup and damages in the event of an oil spill. ([Washington State Department of Ecology](#))

How Compliance Works

Washington State Ecology (“Ecology” refers to the Washington State Department of Ecology) has established two paths for vessels to demonstrate financial responsibility under the COFR program: ([Washington State Department of Ecology](#))

Status	Who It Applies To	Action Required	Important Notes
<p> No COFR Required</p>	<p>Vessels that are members of an International Group P&I Club or insurer that Ecology has approved and <i>can verify</i> your company's entry status</p>	<p>None</p>	<p>Ecology confirms membership/entry through its verification process; no separate COFR application is required. If Ecology requests proof of membership/entry, owners must provide it promptly. (Washington State Department of Ecology)</p>
<p> Pre-Submission Review Recommended</p>	<p>Vessels insured outside of the International Group with another P&I insurer that Ecology can verify</p>	<p>Optional: upload draft insurance/financial documents to the Ecology COFR portal for pre-submittal review</p>	<p>Draft review can help ensure the submission satisfies COFR requirements before final application. (Washington State Department of Ecology)</p>
<p> COFR Submission Required</p>	<p>Vessels that are not members of a P&I insurer that Ecology has approved and /or can verify membership/entry</p>	<p>Submit a Washington COFR application via the Ecology COFR portal by April 15, 2026</p>	<p>Owners/operators must show proof of financial responsibility using acceptable instruments (insurance, guaranty, letter of credit, etc.). (Washington State Department of Ecology)</p>

Note – IG Clubs and some fixed P&I insurers; namely Korea P&I and Hydor are examples of approved P&I insurers that can be verified

What Ecology Requires

1. Verification of P&I Club Membership

Ecology will attempt to verify whether a vessel is a member of an approved P&I club/insurer. If verification is successful, *no COFR application is required*. If Ecology cannot verify membership/entry, the vessel must either provide proof of current membership on request or submit a COFR application. ([Washington State Department of Ecology](#))

2. COFR Application

Owners/operators of vessels that are not verified P&I members/insureds of an approved P&I Club/insurer must submit a COFR application, which includes documentation demonstrating financial responsibility. Ecology accepts a variety of instruments, including:

- Insurance policies (with a Washington COFR form)
- Surety bonds
- Guarantees
- Letters of credit
- Certificates of deposit
- Other acceptable instruments defined in Ecology guidance documentation. ([Washington State Department of Ecology](#))

Ecology strongly encourages owners/operators to use the draft submission feature in the COFR system to get feedback *before* final submission. ([Washington State Department of Ecology](#))

3. Timing

The COFR rule requires compliance on or before April 15th, 2026, for vessels. ([Washington State Department of Ecology](#)) For vessels that require COFRs, once Ecology issues the certificate, it is typically valid for two years from the issuance date. ([law.cornell.edu](#))

4. Ongoing Obligations

If there are significant changes after a Washington COFR is issued (such as a change in ownership, financial responsibility instrument termination, or applicable limit of liability), the COFR holder must notify Ecology within a defined period. Ecology may suspend or revoke the COFR if financial responsibility is no longer demonstrated. ([Justia Regulations](#))

Resources for Clients

- **Department of Ecology – Financial Responsibility for Oil Spills**
<https://ecology.wa.gov/Spills-Cleanup/Prevention/Financial-responsibility-for-oil-spills> (Washington State Department of Ecology)
- **Washington COFR Application Portal (SAW)**
<https://apps.ecology.wa.gov/COFR/> (Washington State Department of Ecology)
- **COFR Application Instructions and Forms (ECY 24-08-008)**
<https://ecology.wa.gov/Spills-Cleanup/Prevention/Financial-responsibility-for-oil-spills/Application-instructions> (Washington State Department of Ecology)
- **Chapter 173-187 WAC – Financial Responsibility (Rule Adoption)**
<https://ecology.wa.gov/regulations-permits/laws-rules-rulemaking/closed-rulemaking/wac-173-187> (Washington State Department of Ecology)

Key Takeaways for International Shipowners

- ✓ If a vessel is a member of an international P&I club/insurer that Ecology can and has verified, no COFR application is required.
- ✓ Vessels outside verifiable P&I membership/entry must submit a Washington COFR by April 15, 2026.
- ✓ Draft submissions are strongly encouraged to ensure compliance before filing final documentation.
- ✓ Ecology's COFR program applies to all covered vessels and requires proof of financial responsibility; it does not limit liability for spill costs under state law. ([Washington State Department of Ecology](#))

Need Assistance?

ShorelineHudson is available to help confirm your vessel's coverage status, prepare COFR applications, and navigate the Department of Ecology requirements on your behalf.

Kind regards,

ShorelineHudson

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