

US Federal COFR Applications – Changes to the Processing of Urgent Applications



Executive Summary

The National Pollution Funds Center has confirmed a significant change to the processing of US Federal COFR applications, effective March 30, 2026. Urgent submissions will no longer be expedited; instead, all applications will be processed strictly in the order received. The official notice from the National Pollution Funds Center is set out below.

Official National Pollution Fund Center Notice

"Effective March 30, 2026, the Vessel Certification Division (Cv) will no longer expedite "urgent" COFR applications at your request. "Urgent" means applications received within the 96-hour arrival notice. The COFR regulation clearly states in 33 CFR 138.80 (b) "The Director must receive the Application, evidence of financial responsibility, and other required supporting documentation, at least 21 days prior to the date the Certificate is required. The COFR Operator may seek an exception to the 21-day submission deadline only as provided in § 138.60(e)(3). Further, 33 CFR 138.60 (e)(3) provides that the Director may, in the Director's sole discretion, grant an exception to a deadline specified in this subpart for good cause shown. Examples of good cause may include adverse weather or other type of emergency.

We had accepted and expedited urgent applications with the goal of facilitating commerce, while ensuring the correct operator was identified and financial responsibility was established. However, the unintended consequence of this accommodation has allowed operators to bypass our regulations and added additional work to Cv staff and enforcement officials. Cv's practice is to review applications in order of receipt. By processing several "urgent" applications daily, our actions effectively penalize the hundreds of operators that follow the regulations.

Going forward, Cv will only consider exception requests that demonstrate a good cause with a detailed written explanation from an officer of the operator, not their representative, as to why the operator did not apply in accordance with the filing requirements detailed in 33 CFR 138.80. If an exception is approved, Cv will process and issue the COFR as expeditiously as possible. The details and written explanation will be shared with enforcement personnel for civil penalty consideration by the Captain of the Port.

Cv appreciates everyone's help and understanding offered over the years."

SIGCo's Recommendations

In light of these changes, and to mitigate the risk of operational delays, including denial of entry, vessel detention, or civil penalties, we strongly recommend that insurance brokers, shipowners, and shipmanagers plan COFR submissions in advance of any potential calls to, or transits through, US waters, in order to comply with the 21-day regulatory submission requirement.

We would also encourage insurance brokers, shipowners, and shipmanagers to enter all vessels under their control with SIGCo on a Service Fee option, in order to provide certainty that short-notice US voyages are not compromised, and to help avoid potential costs or disruption in the event that US entry is declined. By way of reminder, under SIGCo's Service Fee option a vessel maintains a valid COFR guaranty for an annual fee of \$500 (less applicable continuity credit), which is intended to cover SIGCo's administrative costs, including certification fees paid by SIGCo to the US Coast Guard on behalf of its members as a further benefit of membership. This amount is treated as a deposit against the premium should the vessel make a US call during the policy period.

If you have any questions or would like to discuss how this change may impact your fleet, please contact us at sigco@sigcogroup.com or +1-441-298-0600.

Sincerely,

SIGCo Group

Date: February 5, 2026