



Technical Circular

No.: 003/2024

Date: 28th February 2024

Subject: Flag Implementation of the Price Cap Policy for Crude Oil and Petroleum Products of Russian Federation Origin

1. An international coalition of nations, including the United States (US), the Group of Seven (G7), the European Union (EU), and Australia (the “Coalition Partners”), have implemented the “Russian Price Cap Policy” impacting a broad range of maritime transport related services, including “Flagging” services, as they relate to the maritime transport of crude oil and petroleum products of Russian Federation origin (collectively, “Russian Oil”).
2. The effect of the Russian Price Cap Policy is to authorize certain persons engaged in maritime transport, including “Flagging registries,” to provide certain services as they relate to the maritime transport of Russian Oil, including vessel registration and “Flagging” services, as long as the Russian Oil being transported is purchased at or below a certain price cap, set by the Coalition Partners.
3. Towards compliance to the Russian Price Cap Policy, various Fla Administrations, including Liberia and Marshall Islands, have implemented requirements as follows:
 - a. Shipowner and/or manager to provide to the Administration, a signed attestation within 30 days of a vessel lifting or loading Russian oil or Russian petroleum products.
 - b. Attestation records for applicable voyages are to be retained for a minimum of five years.
 - c. Vessels found to be in violation of the Price Cap framework and/or unable to provide additional information as required, may be de-flagged from the Registry.
4. Owners and Managers of ships involved in the carriage of Russian oil or Russian petroleum products are advised to be guided by above and ensure compliance to Flag State requirements in this regard.
5. Copy of Liberian Marine Advisory No. 06/2024 and Marshall Islands Marine Notice No. 1-000-5 on the subject is attached for reference.

Enclosure:

1. Liberian Marine Advisory No. 06/2024
2. Marshall Islands Marine Notice No. 1-000-5



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Office of
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THE REPUBLIC OF LIBERIA

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February 18th, 2024

Marine Advisory: 06/2024

REGULATION IN FURTHERANCE OF THE PRICE CAP FRAMEWORK FOR OIL OR PETROLEUM PRODUCTS OF RUSSIAN FEDERATION ORIGIN

WHEREAS Section 12 of Liberia Maritime Law vests in the Deputy Commissioner of Maritime Affairs the authority to make and promulgate Regulations and Rules for matters pertaining to Liberian flagged vessels, and such Regulations and Rules shall have the force and effect of law.

Whereas, the United States Department of Treasury issued on February 3, 2023, and revised on December 20, 2023, the OFAC Guidance on Implementation of the Price Cap Policy for Crude Oil and Petroleum Products of Russian Federation Origin to implement the price cap policy.

NOW, THEREFORE, the following Regulation, as contained in all of the paragraphs stated hereunder, is hereby promulgated with full legal force and effect:

1. Shipowner and/or manager must provide to the Liberian Administration, a signed attestation within 30 days of a vessel lifting or loading Russian oil or Russian petroleum products.
2. Shipowner and/or manager shall utilize the Liberian Administration's standard attestation form "**PER-VOYAGE G7 PRICE CAP ATTESTATION.**"
3. Parties must retain relevant attestation records for applicable voyages for a minimum of five years.
4. Vessels found to be in violation of the Price Cap framework and/or unable to provide additional information as required, may be de-flagged from the Registry.

Effective Date: This Regulation shall become effective immediately upon publication as prescribed by law.

Dated this 18th day of February 2024.

Margaret C. Ansumana
Sr. Deputy Commissioner of Maritime Affairs, Republic of Liberia



Office of
Deputy Commissioner of
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APPENDIX

THE REPUBLIC OF LIBERIA

LIBERIA MARITIME AUTHORITY

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PER-VOYAGE G7 PRICE CAP ATTESTATION

Vessel Name / IMO Number:

As the shipowner and/or manager of the above referenced vessel, _____
("Company") confirms that such vessel has loaded or will load oil or a petroleum product in
compliance with the G7 Price Cap framework.¹

Actual or Anticipated Loading Date

Signature of Authorized Representative or Attorney-in-fact

Name

Title

Date

¹ This "Per-Voyage G7 Price Cap Attestation" is consistent with and pursuant to the OFAC Guidance, dated February 3rd, 2023, and revised on December 20th, 2023, *OFAC Guidance on Implementation of the Price Cap Policy*



REPUBLIC OF
THE MARSHALL ISLANDS

MARITIME ADMINISTRATOR

Marine Notice

No. 1-000-5

Feb/2024

TO: ALL SHIPOWNER, OPERATORS, MASTERS, OFFICERS, AND AGENTS OF REPUBLIC OF THE MARSHALL ISLANDS REGISTERED TANK VESSELS

SUBJECT: Flag Implementation of the Price Cap Policy for Crude Oil and Petroleum Products of Russian Federation Origin

- Reference:**
- (a) RMI [Maritime Act](#)
 - (b) RMI [Maritime Regulations](#) (MI-108)
 - (c) RMI Marine Notice [1-000-1](#), *Issuance of Republic of the Marshall Islands Marine Notices*
 - (d) [United States of America \(US\) Executive Order 14071](#), *Prohibiting New Investment in and Certain Services to the Russian Federation in Response to Continued Russian Federation Aggression*, issued on 6 April 2022
 - (e) [US Department of the Treasury](#), *Preliminary Guidance on the Implementation of a Maritime Services Policy and Related Price Exception for Seaborne Russian Oil*, issued on 9 September 2022
 - (f) [US Department of Treasury Office of Foreign Assets Control \(OFAC\)](#), *Russian Harmful Foreign Activities Sanctions, Frequently Asked Questions 1094*, issued on 31 October 2022
 - (g) [US Department of the Treasury Determination Pursuant to Section 1\(a\)\(ii\) of Executive Order 14071](#), *Prohibitions on Certain Services as They Relate to the Maritime Transport of Crude Oil of Russian Federation Origin*, issued on 21 November 2022
 - (h) [US Department of the Treasury](#), *OFAC Guidance on Implementation of the Price Cap Policy for Crude Oil of Russian Federation Origin*, issued on 22 November 2022
 - (i) [US Department of the Treasury](#), *OFAC Preliminary Guidance on Implementation of the Price Cap Policy for Petroleum Products of Russian Federation Origin*, issued on 30 December 2022
 - (j) [US Department of the Treasury Determination Pursuant to Section 1\(a\)\(ii\) of Executive Order 14071](#), *Prohibitions on Certain Services as They Relate to the Maritime Transport of Petroleum Products of Russian Federation Origin*, published on 3 February 2023
 - (k) [US Department of the Treasury Determination Pursuant to Sections 1\(a\)\(ii\), 1\(b\), and 5 of Executive Order 14071](#), *Price Cap on Petroleum Products of Russian Federation Origin*, published on 3 February 2023
 - (l) [US Department of the Treasury](#), *OFAC Guidance on Implementation of the Price Cap Policy for Crude Oil and Petroleum Products of Russian Federation Origin*, issued on 3 February 2023

- (m) [US Department of the Treasury OFAC General License 56A](#), *Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587, Authorizing Certain Services Related with Respect to the European Union*, issued on 3 February 2023
- (n) [US Department of the Treasury OFAC General License 57A](#), *Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587, Authorizing Certain Services Related to Vessel Emergencies*, issued on 3 February 2023
- (o) [US Department of the Treasury OFAC Alert](#), *Possible Evasion of the Russian Oil Price Cap*, issued April 2023
- (p) [US Department of the Treasury OFAC General License No. 55A](#), *Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR part 587, Authorizing Certain Services Related to Sakhalin-2*, issued on 14 September 2023
- (q) [US Department of the Treasury Press Release](#), *Price Cap Coalition Advisory for the Maritime Oil Industry and Related Sections*, issued on 12 October 2023
- (r) [US Department of the Treasury](#), *OFAC Guidance on Implementation of the Price Cap Policy for Crude Oil and Petroleum Products of Russian Federation Origin*, issued on 3 February 2023, revised on 20 December 2023
- (s) [United Kingdom \(UK\) Treasury](#), *Maritime Services Prohibition and Oil Price Cap Guidance*, issued December 2023
- (t) [Council Regulation \(EU\) No 833/2014](#), *Concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine*, of 31 July 2014
- (u) [Council Regulation \(EU\) 2022/1904](#), *amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine*, of 6 October 2022
- (v) [Council Regulation \(EU\) 2023/2878](#), *amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilizing the situation in Ukraine*, of 18 December 2023
- (w) [Price Cap Coalition](#), *Oil Price Cap (OPC) Compliance and Enforcement Alert*, 1 February 2024

PURPOSE:

An international coalition of nations, including the United States (US), the Group of Seven (G7), the European Union (EU), and Australia (the “Coalition Partners”), have agreed to implement a policy (generally the “Russian Price Cap Policy”) impacting a broad range of maritime transport related services, including “Flagging” services, as they relate to the maritime transport of crude oil and petroleum products of Russian Federation origin (collectively, “Russian Oil”).

The Russian Price Cap Policy is intended to afford for a reliable supply of Russian Oil to the global market, while simultaneously reducing the revenues the Russian Federation receives from the sale thereof. The effect of the Russian Price Cap Policy is to authorize certain persons engaged in maritime transport, including “Flagging registries,” to provide certain services as they relate to the maritime transport of Russian Oil, including vessel registration and “Flagging” services, as long

as the Russian Oil being transported is purchased at or below a certain price cap, set by the Coalition Partners.

The price cap for Russian crude oil has been set at \$60 per barrel as of 5 December 2022. The price cap for Russian petroleum products has been set at two levels: one for “premium-to-crude” petroleum products, such as diesel, kerosene and gasoline, and the other for “discount-to-crude” petroleum products, such as fuel oil and naphtha. The price caps for premium-to-crude products and discount-to-crude products have been set at \$100 per barrel and \$45 per barrel, respectively, as of 5 February 2023. All price caps are subject to change by the Coalition Partners.

Because the Republic of the Marshall Islands (RMI) registered fleet is provided administrative and technical support by International Registries, Inc. and its affiliates (IRI) and its global network of subsidiaries, the RMI Maritime Administrator (the “Administrator”) adheres to trade restrictions outside of those in place in the RMI, including, for the purposes of this Marine Notice, the Russian Price Cap Policy administered and enforced by the Coalition Partners.

This Marine Notice supersedes that of Nov/2023. It has been updated to reflect the current Russian Price Cap policy as provided in the Reference section.

APPLICABILITY:

The Administrator requirements regarding the Russian Price Cap Policy apply to all RMI registered tank vessels.

REQUIREMENTS:

Registered Owners and Agents seeking to register a tank vessel with the Administrator represent, warrant, and attest, to and for the benefit of the Administrator and its agents, that, on the date that a Certificate of Registry is issued, whether provisional or permanent, and as a condition of such issuance by the Administrator, that the vessel is in compliance with the Russian Price Cap Policy, including the then applicable attestation and recordkeeping requirements of the Russian Price Cap Policy as they pertain to the seaborne transportation of Russian Oil by such vessel.

Registered Owners and Agents of all RMI tank vessels registered with the Administrator represent, warrant, and attest, on a continuing basis to and for the benefit of the Administrator and its agents, that, as a condition of such registration and any attendant flag services requested of the Administrator, the vessel is in compliance with the Russian Price Cap Policy, including the then applicable attestation and recordkeeping requirements of the Russian Price Cap Policy as they pertain to the seaborne transportation of Russian Oil by such vessel.

Beginning on 19 February 2024, the Registered Owner or authorized Agent of each RMI tank vessel registered with the Administrator, as a condition of such registration and any attendant flag services requested of the Administrator, shall be required to provide the Administrator with an attestation, in substantially the form as available at <https://price-cap.register-iri.com>, within thirty (30) days of the lifting or loading Russian oil or petroleum products by such vessel.

The Administrator hereby reserves the right, in its sole discretion, to cancel the Certificate of Registry of any RMI registered tank vessel found to be in violation of the Russian Price Cap Policy, including the then applicable attestation and recordkeeping requirements of the Russian Price Cap Policy as they pertain to the seaborne transportation of Russian Oil by such vessel, and/or the representations, warranties, and attestations set forth in this Marine Notice.