

The Republic of Palau
Palau International Ship Registry
“The Sea Lane to Prosperity”

MARINE CIRCULAR 12-004 – OFAC Compliance Checklist

To: ALL SHIPOWNERS, MANAGERS, OPERATORS AND MASTERS, DEPUTY REGISTRAR AND REGISTRATION AGENTS

Subject: OFAC Compliance Checklist

1. Background

- 1.1 Due to the political condition in Syria and Iran, and due to the sanctions imposed by United Nations Security Council and U.S. Government against these nations, Palau International Ship Registry (PISR) has issued Circular 12-001 and Circular 12-002 to prevent registration of blocked vessels or vessels owned, managed or affiliated with blocked companies or persons.

2. Objective

- 2.1 The objective of this circular is to ensure compliance with Circulars 12-001 and 12-002 at the time of new registration, renewals and change of ownership.

3. Definitions

“*OFAC*” The Office of Foreign Assets Control (OFAC) of the US Department of the Treasury administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States.

“*Blocked or Blocking*” Another word for it is "freezing." It is simply a way of controlling targeted property. Title to the blocked property remains with the target, but the exercise of powers and privileges normally associated with ownership is prohibited without authorization from OFAC. Blocking immediately imposes an across-the-board prohibition against transfers or dealings of any kind with regard to the property.

4. Applicability

4.1 This Circular applies to all new vessel registrations, renewal of vessels currently under the Palau Flag and change of ownership as of May 28th 2013.

5. Requirements:

5.1 Deputy Registrars and Registration Officers shall fill in the form “PISR-OFAC COMP CHECKLIST” for all new registrations, renewal of Registration and change of ownership. PISR will review the checklist duly filled and check the information with the SDN List published by OFAC and found in the websites: sdnsearch.ofac.treas.gov/ and www.treasury.gov/ofac/downloads/t11sdn.pdf and upon confirming that the vessel, owners, affiliated owner group and managing company are cleared of any blocking, PISR will confirm acceptance of the vessel and the registration can proceed accordingly. No registration, renewal or change of ownership shall be processed without consent from PISR HO.

6. Additional Information

6.1 For additional information of the Republic of Palau measurements, procedures, and requirements to ensure that vessels registered under the Palau Flag are not within the blocked or sanctioned list imposed by the UN or US, please contact:

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