

U.S. Department of
Homeland Security

United States
Coast Guard




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MEMORANDUM

From:  (COMDT (CG-BSX))

Reply to: CG-BSX-23
Attn of: Phil Cappel
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To: FILE

Subj: POLICY REGARDING HULL IDENTIFICATION NUMBERS FOR
PADDLEBOARDS AND KITEBOARDS

Ref: (a) 46 U.S.C. §4305
(b) 33 CFR Part 181, Subpart C

1. PURPOSE.

The U.S. Coast Guard, Office of Auxiliary and Boating Safety, under the authority granted by reference (a), may issue an exemption from a regulation prescribed under 46 U.S.C. §4305 so long as it is determined that recreational vessel safety will not be adversely affected. This policy is providing such an exemption regarding 33 CFR Part 181, Subpart C, specific to hull identification numbers for paddleboards and kiteboards that are solely human or wind propelled.

2. BACKGROUND.

Paddleboarding and kiteboarding have become increasingly popular water sports activities. Paddleboarding involves paddling a board that has little or no open passenger carrying area into which water will flow with a kayak style paddle on lakes and reservoirs, oceans, and on rivers. Kiteboarding is similar to waterskiing, except the rider is pulled through the water by means of a wind-propelled kite-like device rather than a boat.

Occasionally, the Coast Guard receives inquiries from various sources regarding the issue of whether or not certain watercrafts are "vessels." Such determination impacts carriage requirements, navigational rules, and accident reporting purposes; and for this, Paddleboards and Kiteboards have been determined to be "vessels." In addition to this, the Coast Guard must determine whether such vessels are "boats," requiring the manufacturer of such vessels to obtain a Manufacturer Identification Code and comply with the Federal regulation to affix Hull Identification Numbers to them.

Upon the issuance of a Manufacturer Identification Code, the Coast Guard has the authority to visit the company's place of business under 46 U.S.C. §4309 and also the authority under 46

U.S.C. §4310 to require the manufacturer to notify owners and recall boats that are defective or that fail to comply with applicable Coast Guard safety regulations. However, in some cases, the Coast Guard may find that there are certain vessels whose construction is so basic, and appears to address risks, as to eliminate the need for factory visits or defect notification and recall authority.

The Manufacturer Identification Code is further a part of a Hull Identification Number that is permanently attached to an applicable boat; and such Number provides identification for vessel numbering and registration purposes, which is critical for many law enforcement and emergency response situations. However, the Coast Guard does not number or register, and is unaware of any state that numbers or registers, paddleboards or kiteboards, as to eliminate the need for the Manufacturer Identification Code or Hull Identification Number.

3. ACTION.

Under the authority granted in 46 U.S.C. §4305, the Coast Guard has determined that exempting non-motorized paddleboards and kiteboards from the regulation to have Hull Identification Numbers affixed will not adversely affect recreational boating safety and therefore exempts these vessels from the regulations in 33 CFR Part 181, Subpart C.

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