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Subj: Policy regarding Hull Identification Numbers for Paddleboards and Kiteboards

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Reference: 33 CFR Part 181, Subpart C

1. Occasionally the Coast Guard receives inquiries from various sources regarding the issue of whether or not certain watercraft are “vessels” for carriage requirement, navigational rule, and accident reporting purposes and whether they are “boats” requiring the manufacturer of such watercraft to obtain a Manufacturer Identification Code and comply with the Federal regulation to affix Hull Identification Numbers to these craft.
2. 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.
3. As a case in point, in a Federal Register notice published on August 20, 1981 (46 FR 161) the Coast Guard announced its determination that sailboards should not be subject to Federal regulations but, however, granted an exemption from preemption to States under the authority of 46 USC 1458 (recodified at 46 USC 4305) so that they could regulate sailboards if they found it necessary to do so. In August of 1993 the Coast Guard formalized this exemption from preemption as it pertains to the carriage of PFDs on sailboards in 33 CFR 175.5.
4. Recently, paddleboarding and kiteboarding have become increasingly popular water sports activities. Paddleboarding involves paddling a watercraft that has little or no open passenger carrying area into which water will flow with a kayak style paddle on flat water or in ocean wave surfing conditions. Kiteboarding is similar to waterskiing, except the rider is pulled through the water by means of a kite-like device rather than a boat. Under the authority granted in 46 U.S.C. §4305, the Coast Guard has determined that exempting paddleboards and kiteboards from the regulation to have Hull Identification Numbers affixed will not adversely affect recreational boating safety and therefore exempts these craft from the regulations in 33 CFR Part 181, Subpart C.

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