



BOAT BUILDER'S HANDBOOK

2021

IDENTIFICATION OF BOATS

33 CFR 181 SUBPART C



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INTRODUCTION

THIS GUIDELINE SERVES TO ADVISE BOAT BUILDERS AS TO THE PROPER FORMAT AND LOCATION FOR THE TWO HULL IDENTIFICATION NUMBERS (SAME NUMBER – TWO PLACES) THAT MUST BE AFFIXED TO ALL RECREATIONAL BOATS.

TAKE HEED: Boat builder compliance means fully meeting all applicable regulations. The Boatbuilder's Handbook provides a basic introduction and summary of the regulations. Builders need to refer to the actual regulations for the complete text of the regulation to ensure full compliance. It is the boat manufacturer's responsibility to review, understand, and comply with all applicable regulations.

1.0 APPLICABILITY

Per 181.23 – 181.29: The boat manufacturer (or importer) must identify each boat with unique primary and duplicate hull identification numbers (HINs) in the specified format (including size) and in the specified locations.

SEE THE HULL IDENTIFICATION NUMBER (HIN) [TRAINING VIDEO ON THE WEBSITE](#)

The hull identification number (HIN) serves to identify the boat manufacturer (always taken herein to include importer) and the date of certification or manufacture.

Complete boat kits. As previously discussed in the 'Certification Label' guideline, a builder of a complete boat kit is the builder of record – and must assign and affix (or provide directions for) proper HINs.

Bare hull builders. Bare hull builders are not boat manufacturers. A bare hull is not a boat, but rather a component of the complete boat. A bare hull builder should not affix a HIN. The boat building company (or individual) who buys a bare hull and completes the boat production is the boat manufacturer and is required to assign the HIN (or obtain a state-assigned HIN). If a boat builder buys a bare hull with a HIN assigned by the bare hull builder, the boat builder must remove or cover the bare hull HIN and assign and affix a proper HIN using the USCG assigned builder code as the first three characters of the HIN.

2.0 HIN FORMAT

As is shown on the following example, the HIN consists of twelve (consecutive) characters – with four basic components. There cannot be any gap or punctuation marks within the HIN.

MANUFACTURER IDENTIFICATION CODE (MIC)

The first three characters identify the manufacturer. Three letter manufacturer identification codes (MICs) are issued by the USCG to recreational boat builders and importers.

With respect to foreign builders, the USCG requires a USA-based importer before it will assign a MIC. The USCG will not assign a MIC to a foreign boat builder. If an imported boat has a foreign assigned HIN, the importer must add a second proper HIN. The USA based importer is the responsible party for defect notifications and correction campaigns.

The one exception to this rule is that the USCG recognizes the builder codes issued by Canada.

ABC22019K021

MIC | Serial Number | * | **

SERIAL NUMBER

The manufacturer is free to use any combination of letters and numbers to create a five-character serial number – except the use of letters that will likely look like numbers. So – the letters 'I', 'O', and 'Q' are not to be used. Manufacturers are free to use serial number characters to designate model names or boat length or whatever they may choose.

*** Date of Certification / Date of Manufacture**

Characters nine and ten designate the date of certification (or manufacture for those boats that do not require certification). Character nine is a letter to represent the month (and as there are too many months to be covered by a single number) per the following table. Character ten is the last digit of the year (0 for 2020 in the example).

A = January	E = May	I = September
B = February	F = June	J = October
C = March	G = July	K = November
D = April	H = August	L = December

****Model Year**

Characters eleven and twelve are the last two digits of the model year. (Model year 2021 in example)

Per 181.3 – Definitions & 181.25 – HIN Format:

(181.3) Date of Certification is the month/year when boat is certified to be in compliance with all applicable regulations. (181.25c) The date of certification can be no earlier than when construction began and no later than the date the boat leaves the place of manufacture (or is imported to the USA).

(181.3) Date of Manufacture is the month/year when boat construction begins. (181.25c – by HIN format requirements). As for date of certification, date of manufacture may be no earlier than when construction began and no later than the date the boat leaves the place of manufacture. Per USC 4302(e): Model Year means the period starting June 1 to July 31 of any year ending on July 31 of the following year. The model year is designated by the year in which it ends.

Boats that require a certification label have a 'date of certification'; all other boats have a 'date of manufacture'.

It makes sense to assign the date of certification when the boat is completed to the point when the applicable regulations have been met – rather than on the day when construction begins. There is nothing to certify on a bare hull.

Manufactures often wait to assign a HIN (and thus the date of certification / manufacture) until a boat is complete and ready for shipment. Boat purchasers will prefer as new a boat as possible.

MODEL YEAR

The definition of model year was changed by a provision within the Coast Guard Authorization Act of 2015 – as codified in Title 46, US Code, 4302(e) – as follows:

"A model year for recreational vessels shall begin on June 1 of a year and end on July 31 of the following year – and be designated by the year in which it ends."

This 14 month window gives boat builders options for the designation of model year. It is expected that most builders will work with a standard 12 month model year beginning each year during the time frame June 1st through August 1st.

The model year indicates a 14-month period where a boat can first be offered for sale.

- Boats for sale prior to June 1 would have a model year that matches the calendar year. For example, the last four characters of the HIN could be B222 (for February 2022).
- Boats for sale between June 1 and July 31 may match the calendar year or jump to the next model year. The last four characters of the HIN could be either G222 or G223 (for July 2022).
- Beginning on August 1st the next model year would be required. The last four characters could be J223 (for October 2022).

MATCHING DATE OF CERTIFICATION/MANUFACTURE AND MODEL YEAR.

The model year is not bound by the certification/manufacture date.

As noted above, the date of certification/manufacture can be any time from the start of construction to the time the boat is shipped from the production facility. Some boats take many months to complete with the time frame covering more than one model year.

- A boat can have a certification/manufacture date prior to the model year. For example, the last four characters of a HIN as A122 is acceptable.
- A boat cannot have a certification/manufacture date after the model year. The last four characters of a HIN as H221 is not acceptable.

Manufacturers can avoid confusion regarding model year compliance by assigning the date of certification/manufacture consistent with the model year. If, during a factory inspection, a builder has a boat with a future model year pre-assigned in the HIN, the manufacturer must be able to ensure that the boat will not be offered for sale before the start of that model year.

As a general rule, manufacturers must not ship future model year boats from the production facility. There are two allowable exceptions to this rule:

- Next model year boats may be staged at dealers in preparation for a new model year showing. Still, next model year boats must not be offered for sale to a consumer until the start of the new model year.
- A new model boat may be introduced to the public at a boat show before the June 1st model year requirement, under the following conditions: (1) there must be no HIN applied; (2) there must be a visible sign reading "For Display Purposes Only, Not for Retail Sale; and (3) the boat remains in the possession of the manufacturer until a HIN is affixed. Boat dealers are excluded from this exception.

3.0 HIN SIZE

The characters of the HIN must be at least ¼ inch in height.

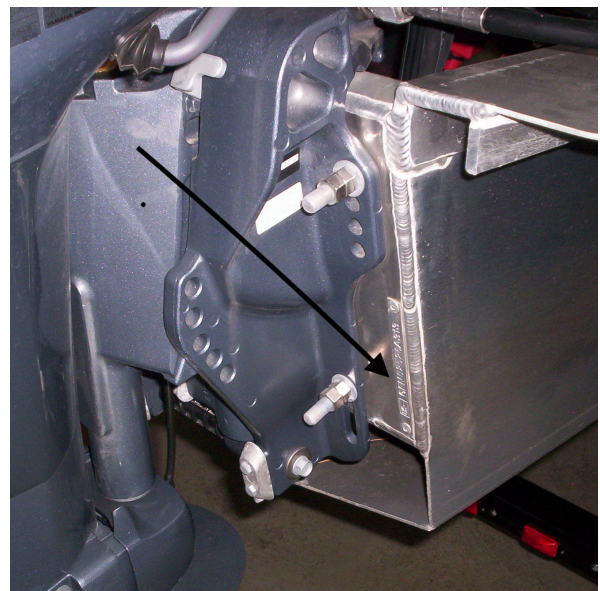
4.0 HIN PLACEMENT

The placement of the primary HIN depends on the type of boat (and hull configuration).

- On boats (typical sterndrives / outboards / rowboats / sailboats) with a transom, the HIN is to be placed to the starboard outboard side of the transom within two inches of the top of the transom, gunwale, or hull/deck joint, whichever is lowest. (If it is impracticable to place the HIN on the transom the number may be moved around to the aft starboard side of the boat.
- On boats (typical canoes / kayaks) without a transom, the HIN is to be placed to the starboard outboard side of the hull within one foot of the stern and within two inches of the top of the hull side, gunwale, or hull/deck joint.
- On catamarans and pontoon boats the HIN is to be placed to the aft crossbeam within one foot of the starboard hull attachment. Finding a proper HIN placement location on a pontoon boat is often a challenge. The spirit of the regulation is to affix a readily visible number starboard side aft.

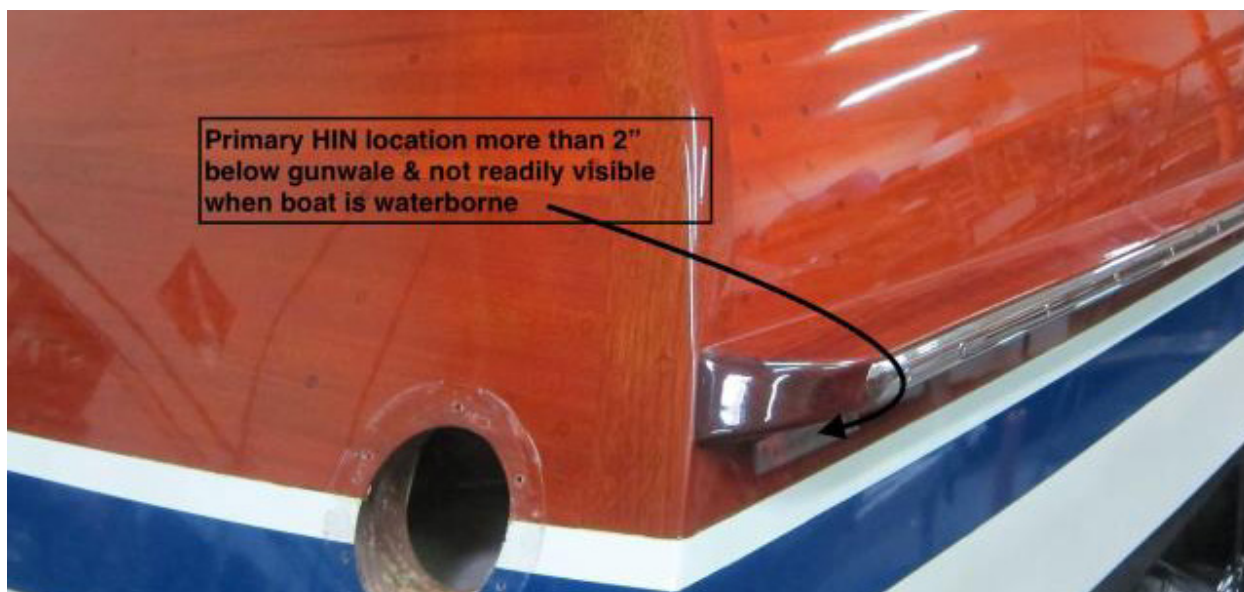


A properly formatted HIN in the proper location at the top of the transom, starboard side



HINs cannot be placed below the waterline.

INCORRECT



HINs may be moved around to the starboard side aft if it is not practical to use the transom, but the number must still be at the top of the side, and certainly not down at the waterline hidden below a railing.

INCORRECT



The HIN must consist of twelve uninterrupted characters. This example with gaps between the MIC and serial number and serial number and dates is not acceptable.



The serial number may not use the letters I, O, or Q which could be easily read as the numbers 1 or 0. If used in a HIN the letter I (in the MIC or date of certification/manufacture) must be distinct from the number 1 – as is properly shown in this example.

The HIN must be readily visible. Moving the HIN to avoid blockage from (such items as fittings or swim platforms) is required.

The duplicate HIN is to be placed in an unexposed location in the interior of the boat or it can be on the outboard side if beneath a fitting or item of hardware. The duplicate HIN is primarily a law enforcement tool; a boat thief may remove the primary HIN but will not know the location of the duplicate HIN. The boat manufacturer will be able to provide the location – and have a record of the original boat purchaser.

The boat manufacturer is not required to report the location of the duplicate HIN to the U.S. Coast Guard unless it is requested to do so by the USCG or other law enforcement officials.

It is difficult to find an unexposed location on some small boats. The USCG grants some leeway for these types of boats. The duplicate HIN may be placed:

- on the (mostly hidden) interior underside of the buoyancy tube of a rubber inflatable
- on the bottom of a single piece roto-molded kayak
- on an open deck rowboat beneath a thwart or seat support.

The chosen location for the duplicate HIN must be protected so that the duplicate HIN will not be defaced or scarred by routine operations.

4.1 HIN ATTACHMENT

Each HIN must be carved, burned, molded, or otherwise permanently affixed so that alteration or removal will be obvious. A HIN on a separate plate must be affixed so that removal of the plate will cause damage to the surrounding area. For instance – a HIN plate would be attached with an epoxy adhesive (such as '5200') in addition to rivets, screws, or brads.



A HIN on a separate plate needs an adhesive in addition to the rivets to meet the requirement that removal of the plate will cause damage to the hull.

5.0 ADDITIONAL INFORMATION

With the exception of the USA country code ("US-"), all additional information must be separated by a border, on a separate label, or be placed at least two inches away from the HIN.

Typical additional information would be company name, model name, and manufacturer production codes. An acceptable 'border' would be having the HIN or the additional information in a box or having a solid line between the HIN and the additional information. For molded in HINs the number and any additional information must have clearly been processed on separate mold labels.

For imported boats, do not include a foreign country code in front of the HIN. If retained the country code or HIN should be in a box, or on a separate label, or be at least 2 inches away from the HIN.

Examples of acceptable HIN postings are:

ACJ17018D121

Avery Boat Co.

MGD10011B121

Arrow Boats

Examples of unacceptable HIN postings are:

FR-DUF44050A121

WAL17007D121

'Waldo 17'



USA based importers must not include the foreign country code in front of the HIN.



If builders add the US code they must not forget the dash. Otherwise the first three characters may be taken as the USCG assigned MIC.



Additional information such as company name and model information must be separated by a border so that the HIN is clear. Using borders or different colors on a HIN plate (as shown here) is acceptable.

6.0 HIN QUALITY

The intent of the HIN regulation is to show a readily visible and readable number on the outboard starboard aft corner of the boat. Law enforcement officials should be able to find and read the HIN with the boat waterborne.

The HIN should consist of distinct characters that can be read without a bright light. The HIN should not be hidden under a fitting, swim platform, engine mount, or ladder. The HIN should not be painted over to the point where it becomes illegible. Molded in HINs from worn out label makers should not be so blurred as to be unreadable.



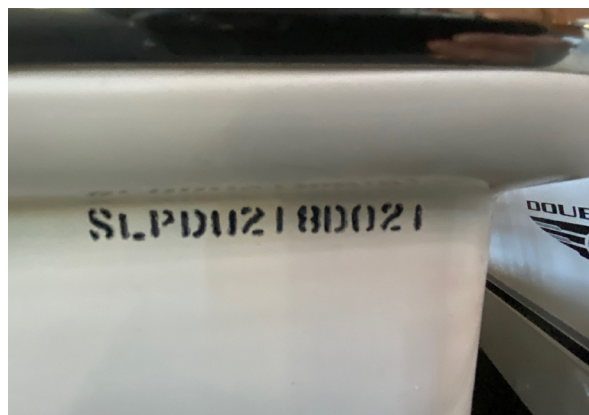
Molded in HINs are common. Here is an example of a good quality molded in number.



Worn out label makers make for unacceptable, illegible HINs.



Illegible HINs are not acceptable.



Split characters are not acceptable as they may be misinterpreted as different letters and/or numbers.

APPENDIX 1. 33 CFR 181 SUBPART C – IDENTIFICATION OF BOATS

§ 181.21 PURPOSE, APPLICABILITY AND EFFECTIVE DATES.

This subpart prescribes the requirements for identification of boats to which section 46 U.S.C. 4301 applies.

§ 181.23 HULL IDENTIFICATION NUMBERS REQUIRED.

(a) A manufacturer must identify each boat produced or imported with primary and secondary hull identification numbers permanently affixed in accordance with § 181.29 of this subpart.

(b) A person who manufactures or imports a boat for his or her own use and not for sale must obtain the required hull identification number in accordance with the requirements of the issuing authority listed in 33 CFR part 173, Appendix A for the boat's State of principal operation and permanently affix the HIN to the boat in accordance with § 181.29 of this subpart.

(c) No person may assign the same HIN to more than one boat.

§ 181.25 HULL IDENTIFICATION NUMBER FORMAT.

Each of the hull identification numbers required by § 181.23 must consist of twelve characters, uninterrupted by slashes, hyphens, or spaces, as follows:

(a) The first three characters must be a manufacturer identification code assigned under § 181.31(a) or the importer designation assigned under § 181.31(b).

(b) Characters four through eight must be a serial number assigned by the manufacturer in letters of the English alphabet, or Arabic numerals, or both, except the letters I, O, and Q.

(c) Characters nine and ten must indicate the month and year of certification when a date of certification is required. In all other cases characters nine and ten must indicate the date of manufacture. The date indicated can be no earlier than the date construction or assembly began and no later than the date the boat leaves the place of manufacture or assembly or is imported into the United States for the purposes of sale. Character nine must be indicated using letters of the English alphabet. The first month of the year, January, must be designated by the letter "A", the second month, February, by the letter "B", and so on until the last month of the year, December. Character ten must be the last digit of the year of manufacture or certification and must be an Arabic numeral.

(d) Characters eleven and twelve must indicate the model year using Arabic numerals for the last two numbers of the model year such as "82" for 1982 and "83" for 1983.

§ 181.27 INFORMATION DISPLAYED NEAR HULL IDENTIFICATION NUMBER.

With the exception of the characters "US-", which constitute the country of origin code for the United States, if information is displayed on the boat within 2 inches of the 12-character hull identification number (HIN), that information must be separated from the HIN by means of borders or must be on a separate label, so that it will not be interpreted as part of the hull identification number.

§ 181.29 HULL IDENTIFICATION NUMBER DISPLAY.

Two identical hull identification numbers are required to be displayed on each boat hull.

(a) The primary hull identification number must be affixed -

On boats with transoms, to the starboard outboard side of the transom within two inches of the top of the transom, gunwale, or hull/deck joint, whichever is lowest.

On boats without transoms or on boats on which it would be impractical to use the transom, to the starboard outboard side of the hull, aft, within one foot of the stern and within two inches of the top of the hull side, gunwale or hull/deck joint, whichever is lowest.

On catamarans and pontoon boats which have readily replaceable hulls, to the aft crossbeam within one foot of the starboard hull attachment.

If the hull identification number would not be visible, because of rails, fittings, or other accessories, the number must be affixed as near as possible to the location specified in paragraph (a) of this section.

(b) The duplicate hull identification number must be affixed in an unexposed location on the interior of the boat or beneath a fitting or item of hardware.

(c) Each hull identification number must be carved, burned, stamped, embossed, molded, bonded, or otherwise permanently affixed to the boat so that alteration, removal, or replacement would be obvious. If the number is on a separate plate, the plate must be fastened in such a manner that its removal would normally cause some scarring of or damage to the surrounding hull area. A hull identification number must not be attached to parts of the boat that are removable.

(d) The characters of each hull identification number must be no less than one-fourth of an inch high.

§ 181.31 MANUFACTURER IDENTIFICATION CODE ASSIGNMENT.

(a) Each person required by § 181.23(a) of this part to affix hull identifications numbers must request a manufacturer identification code in writing from the Commandant (CG-BSX-23), Attn: Recreational Boating Product Assurance Branch, U.S. Coast Guard Stop 7501, 2703 Martin Luther King Jr. Avenue SE., Washington, DC 20593-7501. The request must indicate the manufacturer's name and U.S. address along with the general types and lengths of boats that will be manufactured.

(b) For boats manufactured outside of the jurisdiction of the United States, a U.S. importer must obtain a manufacturer identification code as required by paragraph (a) of this section. The request must indicate

the importer's name and U.S. address along with a list of the manufacturers, their addresses, and the general types and sizes of boats that will be imported. If a nation has a hull identification number system which has been accepted by the Coast Guard for the purpose of importing boats, it may be used by the importer instead of the one specified within this subpart. To request a list of those nations having such a numbering system, write to the Commandant (CG-BSX-23), Attn: Recreational Boating Product Assurance Branch, U.S. Coast Guard Stop 7501, 2703 Martin Luther King Jr. Avenue SE., Washington, DC 20593-7501.

§ 181.33 CONDITIONS FOR USE OF MANUFACTURER IDENTIFICATION CODES.

(a) No manufacturer or importer may sell or transfer a manufacturer identification code or use a manufacturer identification code that has been assigned to another.

(b) A manufacturer or importer who changes the business name or address must advise the Commandant (CG-BSX-23), Attn: Recreational Boating Product Assurance Branch, U.S. Coast Guard Stop 7501, 2703 Martin Luther King Jr. Avenue SE., Washington, DC 20593-7501 of the change in writing.

§ 181.35 REMOVAL OF NUMBERS.

No person may remove or alter a number required by this subpart unless authorized by the Commandant, U.S. Coast Guard.