



16750
CG-BSX-23 Policy Letter 23-07
29 November 2023

From: T.P. Glendye
COMDT (CG-BSX)

To: Distribution

Subj: ADOPTION OF SAE AND ISO PERSONAL WATERCRAFT STANDARDS AS
EQUIVALENT TO 33 CFR SUBCHAPTER S

Ref: (a) 46 USC 4305; Exemptions and Equivalents
(b) CG-BSX-23 Policy Letter 22-01; Recreational Boat Exemptions &
Equivalencies
(c) SAE J1973_202302; Personal Watercraft – Floatation
(d) SAE J2034_202303; Personal Watercraft Ventilation Systems
(e) SAE J2566_202308; Personal Watercraft – Display of Persons Capacity
Information
(f) SAE J2608_202302; Off Throttle Steering and Obstacle Avoidance
Capabilities of Personal Watercraft
(g) SAE J2882_202209; Maximum Velocity of Personal Watercraft
(h) SAE J2120_202302; Personal Watercraft – Electrical Systems
(i) SAE J2046_202302; Personal Watercraft – Fuel Systems
(j) ISO 13590:2022; Small craft — Personal watercraft — Construction and
system installation requirements
(k) CG-BSX Policy Letter 22-02, CH-1; Change 1 to Requirements for
Mechanically Propelled Personal Hydrofoils (eFoils) and Mechanically
Propelled Surfboards (Jetboards)

1. Purpose.

This policy letter provides guidance for manufacturers of personal watercraft (PWC) to use references (c) through (i) or reference (j) as alternative methods of compliance that provide an equivalent level of safety to the requirements found in 33 CFR part 183.

2. Background.

- a. The USCG has statutory authority under reference (a) to accept a substitution for associated equipment performance or other safety standards for a recreational vessel if the substitution provides an equivalent level of safety.
- b. Historically, the USCG has issued exemptions under reference (a) for PWC subject to regulations in 33 CFR part 183 if our agency assessed that recreational vessel safety would not be adversely affected. Part 183 provides minimum safety standards for

recreational vessels offered for sale in the United States but did not envision personal watercraft when promulgated in 1972. Due to their unique design, personal watercraft cannot comply with the part 183 requirements and have required exemptions. To ensure the intent of minimal safety standards in 33 CFR part 183 are met, it is common practice for manufacturers to design to SAE standards listed in references (c) through (i), or to the ISO standard listed as reference (j).

3. Discussion.

- a. The USCG has established precedence by accepting references (c) through (i) or reference (j) as an acceptable level of safety when exempting PWCs from specific requirements in the Code of Federal Regulations.
- b. The USCG has determined that compliance with references (c) through (i) or reference (j) meets an equivalent level of safety to the requirements found in 33 CFR Part 183 for inboard boats, which are applicable to PWC. This policy letter would offer an alternative means of compliance with the current regulations. Specifically, the SAE standards (references (c) through (i)) can be used, or ISO standards (reference (j)) can be used in lieu of the following subparts:

- (1) Part 183, Subpart B – Display of Capacity Information
- (2) Part 183, Subpart C – Safe Loading
- (3) Part 183, Subpart F – Flotation Requirements for Inboard Boats, Inboard/Outdrive Boats, and Airboats
- (4) Part 183, Subpart I – Electrical Systems
- (5) Part 183, Subpart J – Fuel Systems
- (6) Part 183, Subpart K – Ventilation

Either references (c) through (i) or reference (j) must be used in its entirety. All other applicable parts of 33 CFR Subchapter S still apply.

- c. Recreational vessels are required to self-certify that products introduced for sale in the United States meet federal regulations. Under this equivalency, manufacturers of PWCs will now self-certify compliance with provisions in 33 CFR part 183 consistent with this policy letter.
- d. Mechanically Propelled Personal Hydrofoils (eFoils) and Mechanically Propelled Surfboards (Jetboards) may not apply this policy for compliance, as they were not considered during the development of references (c) through (j). Reference (k) clarifies that although States may consider eFoils and Jetboards to be PWC for the purposes of issuing a certificate of number, eFoils and Jetboards are not considered PWC for the purposes of complying with the requirements of 33 CFR part 183.

4. Action.

- a. Manufacturers of PWCs may now offer products for sale without requesting an exemption if they are using references (c) through (i) or reference (j) to satisfy

requirements in 33 CFR part 183 consistent with equivalencies announced in this policy letter.

- b. Manufacturers may use all referenced SAE standards, or the referenced ISO standard to meet equivalency. The chosen alternative means of compliance must be used exclusively and entirely and may not be used conjointly.
- c. Manufacturers must affix a Manufacturers Certification of Compliance label to comply with the requirements of 33 CFR 181.15. Those PWC manufacturers choosing to use references (c) through (i) or reference (j) as means of compliance with 33 CFR Part 183 must have a label that includes the words:

This personal watercraft complies with U.S. Coast Guard Safety Standards on the date of certification based on [SAE or ISO] equivalencies announced in CG-BSX-23 Policy Letter 23-07.

- d. Manufacturers of PWCs wishing to meet the minimum safety standards through standards other than references (c) through (j) should submit a request for equivalency to the Office of Auxiliary & Boating Safety's Recreational Boating Product Assurance Branch (CG-BSX-23), and may not introduce a PWC for sale in the United States until written approval is received.

5. Compliance.

- a. Effective beginning with model year 2025, PWC manufacturers no longer need to submit a request for exemption if they are using references (c) through (i) or reference (j) to meet the 33 CFR part 183 requirements as set forth in this policy.
- b. This policy does not cover PWCs constructed with standards outside the scope of references (c) through (j).

6. Disclaimer.

The guidance in this policy letter is not a substitute for applicable legal requirements and is not a rule. It is not intended to impose legally binding requirements on any party. This guidance represents the USCG's current thinking on this topic and may assist industry, mariners, the public, and the Coast Guard, as well as other Federal and state regulators, in applying statutory and regulatory requirements. An alternative approach for complying with these requirements is acceptable if the approach satisfies the requirements of the applicable statutes and regulations.

7. Contact Us.

Questions concerning recreational vessel regulatory compliance should be directed to Commandant (CG-BSX-23), Office of Auxiliary & Boating Safety, at rbscompliance@uscg.mil.

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PWC Manufacturers
Transport Canada
American Boat & Yacht Council (ABYC)
National Marine Manufacturers Association (NMMA)
Personal Watercraft Industry Association (PWIA)