

U.S. Department of  
Homeland Security

United States  
Coast Guard



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16714/GEN  
CORR: WMS-2020-1413  
December 21, 2020

Life Jacket Association  
Attn: Mr. Gordon Colby, President  
1648 Mcgrathiana Pkwy Ste 360  
Lexington, KY 40511

Subj: USCG Guidance for PFD Compliance Verification

This is in response to your letter dated October 21, 2020, requesting clarification on the regulatory requirements for placing personal floatation devices (PFDs) on the market for sale in the U.S. to support your ongoing communications with Amazon's Product Compliance. In particular, you have noted that Amazon requires online sellers to provide documentation proving that PFDs are certified under specified UL standards and that PFDs have been tested by a laboratory accredited by an ILAC member to ISO 17025.

While we recognize that a vendor may elect to impose additional requirements within their marketplace, these statements demonstrate Amazon's misunderstanding of the regulatory basis for offering USCG approved marine equipment for sale in the U.S. As such, we provide the following information to help ensure that PFDs available to the public meet the relevant requirements, without imposing undue or inappropriate restrictions on the availability or sale of these devices.

### **USCG Approval of Marine Equipment**

The U. S. Coast Guard approves marine equipment, including PFDs such as lifejackets, required by regulation or statute to be approved in order to be acceptable for carriage on a U.S. commercial vessel or recreational boat. USCG approval indicates that the equipment meets minimum safety requirements set forth in regulation or policy. USCG approved PFDs must be tested by an independent laboratory recognized by the Coast Guard in accordance with 46 CFR 159.010. Though these labs may be accredited to ISO 17025, such accreditation is not required by regulation.

If a PFD is not used to meet carriage requirements on a commercial vessel or recreational boat, it is not required to be USCG approved. Non-approved PFDs may be used as swim aids in pools or beaches, in specialized aquatic activities such as watersports, or carried as excess equipment on board recreational boats.

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Please note that products which are not approved may not be represented, expressly or otherwise, as approved. Vendors who represent un-approved marine products as approved may be subject to civil and criminal penalties under 46 U.S.C. 3318.

### **'Types' of USCG Approved PFDs**

While USCG approved PFDs may be marked with a "Type Code" (e.g. I, II, III, IV, or V) or a "Performance Level" (e.g. Level 70), the pertinent categorization for PFDs is 'wearable' or 'throwable.' Wearable PFDs are commonly referred to as lifejackets, life vests, buoyancy or flotation aids, or flotation coats. Throwable PFDs include buoyant cushions, ring buoys, or horseshoe buoys. USCG approved PFDs may achieve the required buoyancy performance with inherently buoyant materials, such as foam, gas inflation, or a combination of both.

### **Applicability of Industry Consensus Standards**

There are a number of national and international consensus standards that include safety requirements for PFDs. While Coast Guard regulations and policy may specify certain standards as an acceptable basis for USCG approval, the Coast Guard has the authority to accept new standards, or to approve marine equipment that deviates from these standards, provided that we have determined that they provide an equivalent level of safety. Amazon specifying the standards applicable to USCG approved PFDs is inappropriate and restricts the Coast Guard's ability to make novel or innovative products available to the marine industry.

### **Availability of USCG Certificates of Approval (COAs)**

Following determination that a product complies with the requirements for approval, we will issue a USCG Certificate of Approval (COA, Form CGHQ-10030), bearing the assigned USCG approval number for that product. While we recognize that some product vendors and online merchants require a copy of the signed COA, it is important to note that a COA may be invalidated or superseded at any point within the validity period for a number of reasons. Additionally, COAs are more often becoming subject to counterfeiting. As such, the signed COA itself is not a reliable means for verifying the status of a USCG approval.

The preferred method for verifying the approval status of a PFD is on the Coast Guard Marine Information eXchange (CGMIX), a searchable listing of USCG approved marine equipment. The current status of an approval can be found by entering the relevant USCG approval number, provided by the manufacturer or printed on the device, into the CGMIX search page, which can be accessed at: <https://cgmix.uscg.mil/Equipment/EquipmentSearch.aspx>. We strongly encourage vendors and online merchants to verify the status of a signed COA on CGMIX. We further recommend that any online listing of USCG approved PFDs include the USCG approval

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number, with a hyperlink to the product's entry on CGMIX, to allow the customer to independently verify and review the approval details prior to purchase.

This letter was delivered electronically to [info@lifejacketassociation.org](mailto:info@lifejacketassociation.org). No hard copies will be provided. If you have any follow-up to this request, please contact me at [typeapproval@uscg.mil](mailto:typeapproval@uscg.mil). Please reference ID#: WMS-2020-1413 in any correspondence related to this request.

Sincerely,

B. A. BALDWIN  
Chief, Lifesaving and Fire Safety Division  
U.S. Coast Guard  
By direction

Copy: Amazon Product Compliance, [product-compliance-us@amazon.com](mailto:product-compliance-us@amazon.com)  
Life Jacket Association Board of Directors, via email