

NATIONAL BOATING SAFETY ADVISORY COUNCIL

October 22, 2016

Arlington, VA

Resolution Number 2016-96-02

Consolidation of Coast Guard Carriage Requirements for Recreational Boat Safety Equipment

On July 22, 2016, the U. S. Coast Guard published a Final Rule in the Federal Register entitled “*Harmonization of Standards for Fire Protection, Detection, and Extinguishing Equipment.*” The rule updated Coast Guard fire safety requirements found in 46 CFR subchapter C (Uninspected Vessels) to meet international and common industry standards. In particular, the Coast Guard required fire extinguishers to be maintained to the National Fire Protection Association (NFPA) 10 standard. One of the requirements in NFPA 10 is extensive record keeping of all monthly inspections and maintenance of fire extinguishers. Analysis for this change in regulations neglected to address the collateral burden on recreational boaters and the recreational boating safety program.

Most Coast Guard regulations applicable to recreational boat safety equipment carriage requirements are found in 33 CFR subchapter S (Boating Safety). If all safety equipment carriage requirements applicable to recreational boaters were located in the same place, it would be easier for the public to reference boating safety regulations.

To address these issues, the National Boating Safety Advisory Council, meeting in regular session in Arlington, VA on October 22, 2016, recommends that the U. S. Coast Guard move the fire protection requirements as soon as possible that apply to recreational vessels (without the new NFPA 10 record keeping requirements), currently listed in 46 CFR subchapter C (Uninspected Vessels), and insert them into 33 CFR subchapter S (Boating Safety), where recreational vessel requirements exist. Furthermore, we also recommend that the Coast Guard consider moving any other requirements applicable to recreational boat safety equipment carriage to 33 CFR subchapter S (Boating Safety) if practical.



L. Daniel Maxim, Chairman
National Boating Safety Advisory Council