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CG-ENG
Policy Letter 01-25
June 13, 2025

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COMDT (CG-ENG)

To: Distribution

Subj: USCG ACCEPTANCE OF NAVIGATION LIGHTS MEETING AMERICAN BOAT
AND YACHT COUNCIL (ABYC) STANDARD ABYC C-5

Ref: (a) ABYC C-5:2024 – Construction and Testing of Electric Navigation Lights
(b) UL 1104:1998 – Standard for Marine Navigation Lights
(c) International Regulations for Preventing Collisions at Sea (72 COLREGS) and the
Inland Navigation Rules, and their Annexes, Title 33 Code of Federal Regulations
(CFR) Subchapters D and E
(d) 46 CFR 111.75-17, 120.420, 143.415, 183.420
(e) ABYC A-16:2016 – Electric Navigation Lights
(f) EN 14744:2005 – Inland navigation vessels and sea-going vessels - Navigation light
(g) ISO 19009:2015 – Small craft - Electric navigation lights - Performance of LED
lights
(h) ABYC A-16:2021 – Installation of Electric Navigation Lights

1. PURPOSE. This policy letter provides guidance for USCG acceptance of navigation lights constructed to the ABYC C-5 standard following ownership transfer of UL 1104 to ABYC.

2. BACKGROUND

- a. USCG regulations in Titles 33 and 46 of the CFR prescribe requirements for vessel navigation lights. These requirements differ based on vessel service and size. Many U.S. commercial vessels must have navigation lights tested and certified to the requirements of UL 1104. UL 1104:1998 is the most recent edition of this standard and UL has dropped it from review.
- b. Over the last several years, ABYC has worked with industry stakeholders and the USCG to develop a new navigation light standard based on currently available technology and test methods while ensuring consistency with existing navigation light standards. This new standard, ABYC C-5, is a construction and testing standard for navigation lights for all vessel types and classes.
- c. Titles 33 and 46 of the CFR also allow the USCG to accept equivalent or “other specified” standards in lieu of those specified in the regulations. ABYC C-5 is at least equivalent to

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UL 1104, ABYC A-16:2016, EN 14744, ISO 19009, the 72 COLREGS, and the US Inland Navigation Rules. ABYC C-5 also addresses LED light degradation and electromagnetic interference.

- d. ABYC published ABYC A-16:2021 with a narrowed scope to address only the installation of navigation lights. ABYC C-5 contains the requirements for navigation light design, construction, performance, and testing.
- e. Navigation lights complying with UL 1104 and ABYC A-16:2016 continue to meet the applicable requirements in Titles 33 and 46 of the CFR, including the 72 COLREGS and the Inland Navigation Rules.

3. DISCUSSION.

- a. The USCG Office of Navigation Systems (CG-NAV) considers navigation lights meeting ABYC C-5 equivalent to lights meeting UL 1104 or ABYC A-16:2016 for the purposes of complying with navigation light standards required in references (f) and (g).
- b. Navigation lights meeting ABYC C-5 meet the 72 COLREGS and the U.S. Inland Navigation Rules.
- c. Where Titles 33 and 46 of the CFR require navigation lights to be certified, a USCG-accepted independent laboratory may be authorized under approval series 111.075 to certify navigation lights as meeting ABYC C-5. The USCG Maritime Information Exchange (CGMIX) lists these laboratories at <https://cgmix.uscg.mil/>.
- d. The marking requirements in ABYC C-5 are equivalent to those in references (f) and (g).
- e. Navigation lights meeting UL 1104 and ABYC A-16:2016 remain acceptable navigation light standards until the USCG removes them from titles 33 and 46 of the CFR.

4. ACTION.

- a. USCG Headquarters Units and Offices, Districts, and Sector Commanders will reference this policy letter to consider navigation lights constructed to ABYC C-5 as equivalent to the applicable navigation light requirements in Titles 33 and 46 of the CFR.
- b. Manufacturers of navigation lights are encouraged to comply with the construction and testing requirements of ABYC C-5.
- c. Vessel manufacturers and owners are encouraged to use the guidance in ABYC A-16:2021 to install navigation lights.

5. DISCLAIMER. This policy is neither a substitute for applicable legal requirements nor is it a rule. It is neither intended to nor does it impose legally binding requirements on any party. It represents the USCG's current position on this topic. It may assist industry, mariners, the public, the Coast Guard, and other federal and state regulators in applying statutory and regulatory requirements. The Coast Guard may consider alternative approaches for

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complying with this policy letter if they satisfy the requirements of the applicable statutes and regulations.

6. CHANGES. This policy letter will be posted online at [CG-ENG Policy \(uscg.mil\)](https://www.dco.uscg.mil/CG-ENG/Policy) (<https://www.dco.uscg.mil/CG-ENG/Policy>). Changes to this policy will be issued as necessary. Any questions concerning this policy should be directed to Commandant (CG-ENG), Commercial Regulations and Standards Directorate, Office of Design and Engineering Standards at CGENG@uscg.mil.

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