



16714
CG-ENG
Policy Letter 03-25
Nov 13, 2025

From: J. R. Doherty, CAPT
COMDT (CG-ENG)

To: Distribution

Subj: EXTENDED VALIDITY PERIOD OF USCG CERTIFICATES OF APPROVAL FOR
PERSONAL FLOTATION DEVICES

Ref: (a) 46 Code of Federal Regulations (CFR) § 2.75, Approvals of Safety Equipment,
Materials and Installations, and Qualifications for Construction Personnel

1. Purpose. This policy letter establishes an extended validity period for U.S. Coast Guard Certificates of Approval (COA) applicable to certain personal flotation devices (PFDs).
2. Directives Affected. None.
3. Action. Independent laboratories recognized by the U.S. Coast Guard and manufacturers of U.S. Coast Guard approved recreational PFDs should take note of the following policy.
4. Background.
 - a. The U.S. Coast Guard has statutory authority under Title 46, U.S. Code, §§ 3306 (a) & (b), 4102 (a) & (b), 4302(a), and 4502(a) & (c)(2)(B) to prescribe regulations for the design, construction, performance, testing, carriage, use, and inspection of lifesaving equipment on commercial and recreational vessels. This authority is further clarified in reference (a).
 - b. U.S. Coast Guard regulations described in 46 CFR § 2.75, state that approvals will be valid and in effect for 5 years unless specifically provided otherwise and stated in the certificate:

2.75-1(d)... Unless specifically provided otherwise, the approval shall be valid for a period of five years from the date on the certificate of approval...

2.75-5(b) The approval shall be in effect for a period of 5 years from the date on the certificate of approval unless canceled or suspended by proper authority, or otherwise specifically stated in the certificate.

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- c. PFDs under approval series 160.064, 160.076, 160.077, 160.264, and 160.276 are certified by recognized independent laboratories that have a Memorandum of Understanding (MOU) with the U.S. Coast Guard, in accordance with 46 CFR § 159.010-7. The Commandant (CG-ENG) performs periodic oversight of these laboratories and the manufacturers to ensure that U.S. Coast Guard approved PFDs continue to meet the standards for approval. Issuance of the U.S. Coast Guard COA is dependent upon satisfactory evaluation by the recognized independent laboratory and continuous enrollment in a production oversight program, administered by the laboratory and accepted by the Commandant. Renewal of the U.S. Coast Guard COA is an administrative process that ensures that the manufacturer continues to comply with all requirements for approval. Under the MOU, recognized independent laboratories are required to immediately notify the U.S. Coast Guard if a PFD they have certified is no longer in compliance.
- d. Based on our review of the procedures for approval of PFDs, and an assessment of our oversight of U.S. Coast Guard recognized independent laboratories, the U.S. Coast Guard has determined that limiting the validity of approvals for certain categories of PFDs to five years does not improve the safety of these products.
- e. There are over 700 current active U.S. Coast Guard approvals for recreational PFDs. Maintaining these COAs imposes an unnecessary burden on the U.S. Coast Guard, with no demonstrable benefit to maritime safety. Extending the validity of these certificates will reduce this burden without jeopardizing public safety.

5. Policy.

- a. Based on the background information above, this office will transition to 10-year validity period for recreational PFD COAs approved under the following approval series:

160.064	160.264
160.076	160.276
160.077	

- b. All new COAs issued after the date of this policy letter will be valid for 10 years and will specifically state the expiration date on the COA. In order to distribute the expiry dates of existing COAs, we will phase in this change according to the following schedule:

If the current COA expires	The renewed COA will be valid for ...
Before 01 Jan 2026	6 years
01 Jan 2026 – 30 Jun 2026	7 years
01 July 2026 – 31 Dec 2026	8 years
01 Jan 2027 – 30 June 2027	9 years

After 30 June 2027	10 years
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- c. Nothing in this policy alleviates the manufacturer from notifying the Commandant (CG-ENG), via the recognized independent laboratory, of any changes in the design or construction of a U.S. Coast Guard approved PFD during the validity period. Modified COAs will be dated according to the date of the modification, with a 10-year validity period specifically stated on the COA.
 - d. The status of any approval can and should be verified using the U.S. Coast Guard Marine Information Exchange (CGMIX) database. Recognized laboratories will notify the Commandant (CG-ENG) if the status of the approval changes, and CG-ENG will update CGMIX accordingly.
 - e. *Existing PFDs*. The approval status of a PFD is not affected by this policy. Currently approved PFDs will maintain their current approval and continue to meet carriage requirements if they are in good serviceable condition and are used in accordance with the label per 33 CFR § 175 and 46 CFR § 25.25.
6. Disclaimer. This policy is neither a substitute for applicable legal requirements, nor is it itself 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 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. Alternative approaches for complying with these requirements may be considered if they satisfy the requirements of the applicable statutes and regulations.
7. Changes. Changes to this policy will be issued as necessary. Suggestions for improvements of this policy should be submitted in writing to CGENG@uscg.mil.

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Manufacturers of U.S. Coast Guard Approved PFDs
U.S. Coast Guard Recognized Independent Laboratories for PFDs