

Best Practices for Self-Importing Vessels

Will Hillyer & Jason Latiolais

Recreational Boating Product Assurance Branch (CG-BSX-23)

United States Coast Guard



Introductions

Will Hillyer - Marine Investigator/ Recreational Boating Safety Specialist



- 24 years active-duty USCG. Primarily serving as a Boarding Officer, Pursuit Coxswain, and Officer in Charge and Executive Petty Officer for South Florida, Caribbean and Central America for Counter-Drug and Alien Migrant Interdiction Operations. Worked closely with CG Investigative Service Key West, FL.
- 11 years in the USCG Boating Safety Division (7 as a civilian position). Graduate of the USCG Marine Investigating Officer School, NASBLA Boating Accident Investigations Level I & II, International Association of Arson Investigators- Marine Arson class, NTSB Marine Investigator course.

Jason Latiolais - Safety Compliance Officer



- Over 23 years active-duty USCG. Served in leadership roles as Executive Petty Officer Multi-Mission Afloat, and Commanding Officer Multi-Mission Ashore, with tours aboard four Coast Guard cutters, three small boat stations, a Maritime Safety and Security Team, and Defense Attaché Office. Operational experience includes SAR, Fisheries Enforcement, Counter-Drug and Alien Migrant Interdiction Operations, Counterintelligence, and Pursuit/Tactical Coxswain duties.
- 1 year in the USCG Boating Safety Division as a Safety Compliance Officer in the Recreational Boating Product Assurance Branch. Graduate of the NASBLA Recreational Boating Safety Leadership Course.



Overview

- Defining self-imports
- Role of the state issuing authority
- Verifying shipping documents
- Online sales and direct shipping
- BOLO: Fraudulent MSOs and HINs
- Pre-owned vessel imports
- Canadian imports
- Resources



Purpose

To assist states in validating legitimate self-imported vessels in order to:

- Combat illegal imports
- Ensure foreign manufacturers use a registered U.S. Importer with an assigned MIC.
33 CFR 181.31 (b).
- Support USCG oversight through testing, compliance inspections, and recalls.



What is a Self-Imported Vessel?

Definition:

- A recreational vessel self-imported by an individual for their own personal use.

Intent of the regulation:

- Allows an individual to purchase a vessel overseas
- Allows the individual to transport it to the U.S. for personal use
- Does **not** create a workaround for foreign sellers shipping directly into the U.S. market



What the Law Says

33 CFR 181.23 (b) states:

A person who manufactures or **imports** a boat for his or her own use **and not for sale** must obtain the required hull identification number in accordance with the requirements of the issuing authority listed in [33 CFR part 173, appendix A](#) for the boat's State of principal operation and permanently affix the HIN to the boat in accordance with [§ 181.29](#) of this subpart.



State issuing authorities are the first line of defense against illegal imports

- Verify the vessel is for personal use, not for resale.
- Confirm the owner took delivery overseas.
- Confirm the owner independently arranged shipping.
- Request and scrutinize shipping documents and importation documents.



Sample Shipping Documents

BILL OF LADING 534 N. MILWAUKEE AVE. MILWAUKEE, WI 53212 PHONE: (414) 224-4475 FAX: (414) 224-4475		COPY NON NEGOTIABLE BILL OF LADING		EDCOQWYPL WAYBILL NUMBER V80027669	
CONSIGNEE KONG HEE SMC CO. PARK 153 TUMON LANE, PIA MARINE CONDO UNIT 1002, TUMON, GUAM 96912 SUPARK@GMAIL.COM 671-640-3127 671-686-7412		EXPORT REFERENCE			
CARRIER APOL Co. Inc. 1000 Head Office: #1401 The Metropole, 1000 6 North Canal Drive, Singapore 100001 Tel: 6578 8000 Fax: 6578 8880		APL 5/13/24			
COMMODITY: CASH ON HAND IN BULK IN BULK NAME AS COMMODITY		FREIGHT TO BE PAID AT ZERO-BE			
VESSEL APL OCEANIA		PLACE OF RECEIPT BUSAN, KOREA		NUMBER OF ORIGINAL BILLS OF LADING ZERO-BE	
PORT OF DISCHARGE P.O. GUAM		PORT OF DISCHARGE P.O. GUAM		FINAL PLACE OF DELIVERY	
MARKS AND NOS CONTAINER AND SEALS 2000121550 SEAL: WLS 235-5E136		NO. AND KIND OF PACKAGES 1 X 40' 1 UNIT(S) USED BAY ACD0000-330 1 UNIT 8,000 NOS USED TOWER FOR ACD0000-330 1 UNIT 2,000 NOS FREIGHT PREPAID AS ARRANGED HANSEL		GROSS WEIGHT TARE MEASUREMENT KGS 170,904 CBM 170,904 GUAM CUSTOMS X-RAY HOLD EXTENSION & GUARANTEE OFFICE MAY 14 2024 2000-1009 72,974	
2000121550 SEAL: WLS		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974		1 X 40' 1 UNIT(S) 2000-1009 72,974	
1 X 40' 1 UNIT(S) 2000-1009 72,974					



REFERENCE
133 CHALAM TUN JOSE
DEDEDU GUAM 96929

PRE-ARRIVAL NOTICE

07/19/2024 09:36 AM

SHIPPER
WARREN HAY MARINE
311 FORT ROAD, PORT WHANGAREI
9116, NEW ZEALAND

NOTIFY
REFERENCE
133 CHALAM TUN JOSE
DEDEDU GUAM 96929

CONSIGNEE
REFERENCE
133 CHALAM TUN JOSE
DEDEDU GUAM 96929

SECOND NOTIFY

VESSEL
OPERATIONAL DISCH. PORT
PLACE OF RECEIPT
OPERATIONAL LOAD PORT
PLACE OF DELIVERY

APL OCEANIA
PITI GUAM
MARSDEN POINT
TAURANGA

DESTINATION PITI GUAM
PL. NUMBER
LOAD PICKUP CODE ADDRESS
CLEARANCE POINT PITI GUAM
ENTRY FREIGHTAN CODE

PLACE OF ISSUE PITI GUAM
PORT AUTHORITY GUAM
PLAS CODE
PORT AUTHORITY GUAM

VOYAGE 000DAW1PL
POD ETA 07/21/2024
PPD ETA

DESI CARD MODE Part

Please clear your cargo with Customs against the following B/L

APLUUSG0269902

RELEASE DATE

PAYMENT RECEIVED NO

OK RECEIVED NO

Please Pay freight against the credits B/L shown below

SCAC BL #
APLU USG0269902
CONTAINER # SEAL #
AMFU4237355 NA

BL TYPE
Waybill
SHIP TYPE PECE CITY & TYPE
40FF
WEIGHT 1 PACKAGE
MEASURE 16226LBS
FREE BUSINESS DAYS AT PORT 1680.88PTQ

PLEASE NOTE

We must have full clearance affidavit provided by OGL, vessel registered and your delivery instructions at least 10 hours before the expected arrival time or storage charges may apply. Please note that demurrage will accrue at the expiration of Free Time in accordance with the APL Tariff. For shipping information please refer to our website or to www.apl.com. All dangerous goods must be properly packaged, stowed, secured and labeled in accordance with the IMDG Code. Any charges related to obtaining permits from the outside or inside of an empty container will be charged back to the cargo owner. THE PARTY SO INVOICED FOR DELIVERY ORDER HAS BEEN ISSUED SHALL BE ENTITLED TO TAKE DELIVERY OF THE CONTAINER(S) WHEN THEY ARRIVE AT THE INDICATED PLACE FROM THE INTENDED VESSEL. Please note in the event that a delay in trip is indicated all cargo deposited will be subject to the APL's Tariff.

Do you know that Arrived before Customs clearance ETA (includes Customs Trucking) Additional cost: \$100 daily, 48 hours to our port or 48 hours a place? For more information, please visit our website www.apl.com.

Please note that demurrage will accrue at the expiration of Free Time in accordance with the APL Tariff. For shipping information please refer to our website at www.apl.com.

All dangerous goods must be properly packaged and stowed. They shall be fully removed from the container before empty loading. Any charges related to re-storing them from full to empty will be charged back to the cargo owner.



Online Sales and Direct Shipping

- Any foreign builder that uses the internet (for example: company website, Alibaba, Amazon, eBay, Facebook Market Place, Craigslist, etc.) to sell vessels for delivery in the U.S. must use a U.S. importer that has been assigned a MIC by the USCG.
- Third party retailers allow sellers to direct sell and ship through their website; bypassing the importer requirement.
- Any vessel sold into the U.S. must go through a U.S. importer. This pertains to A&J and is per 46 USC 4307 (Prohibited Acts)
- Consumer Product Safety Commission - Amazon Lawsuit



Self-Import vs. Online Sale—Direct Shipping

SELF-IMPORT

- 1 Purchaser buys the vessel for personal use and takes delivery overseas
- 2 Purchaser independently arranges transportation to the United States

Shipping documents help establish the transaction

ONLINE SALE—DIRECT SHIPPING

- 1 Foreign builder markets or sells the vessel for U.S. delivery
- 2 Seller, manufacturer, platform, or agent arranges delivery to the U.S. purchaser
Foreign Manufacturer • Amazon • Alibaba • eBay
- 3 **A U.S. importer with a USCG-assigned MIC is required**

KEY TAKEAWAY

Direct shipping bypasses the legal requirement for a U.S. importer and is considered an illegal import

46 U.S.C. § 4307 • USCG HIN Policy 23-02



BOLO - Fraudulent Titles



The Coast Guard has received from the state of Nevada information that fake/fraudulent titles are being sold on Alibaba.com by a company called Dongguan Dingsen Electronic Technology Company. This company prints numerous states titles, presumably all titling states may be affected. The Coast Guard's Criminal Investigative Service (CGIS) has been notified. It is not clear at this time how accurate these fake titles are or how widespread their use. Coast Guard requests you contact RBScompliance@uscg.mil if you encounter one.

Alibaba.com
MIC- None
China
HIN- N/A

Contact RBScompliance@uscg.mil for more information or if you encounter one of these fake titles. Ref the BOLO # and the company name in the Subj line.



BOLO - Fraudulent HINS

- HINS provided by a foreign manufacturer
- MIC is assigned to U.S. manufacturer MARINE TECHNOLOGY INC.
- The manufacturer identified by the MIC does not match the vessel.

MARINE TECHNOLOGY INC			
MIC:	VIC	Status:	In Business
Company:	MARINE TECHNOLOGY INC	Company Official:	STUART, TOM
DBA	INTERSTATE SPORTS (OOB)	Parent MIC:	
Parent Company			
Past Company 1:	VICAN INC (OOB)		
Past Company 2:			
Past Company 3:			
Address:	165 ENTERPRISE DRIVE	City:	WENTZVILLE
State:	MO	Zip:	63385
Country:	USA	Phone:	(636) 639-1166
Fax:		In Business:	5/10/1999
Out of Business:		Date Modified:	1/29/2021
Type:	Inboards, Cabin Cruisers	Additional Address:	

MANUFACTURER'S STATEMENT OF ORIGIN TO A BOAT

The undersigned corporation hereby certifies that the new boat described below, the property and said corporation, has been transferred this _____ day of _____ year _____ on invoice# _____ to _____ whose address is _____

Year of build: _____
Type of boat: SKayak
Serial number: _____

VIC21002G525
VIC21005G528
VIC21003G526
VIC21001G525

The corporation further certifies that this was the first transfer of such new boat in ordinary trade and commerce.

By _____ (Authorized Signature)
(Title of Position)

VIC21002G525
VIC21005G528
VIC21003G526
VIC21001G525

Pre-Owned Vessel Imports

- A person may purchase a pre-owned foreign-built vessel for their own use and import it into the United States.
- The original foreign manufacturer is not the seller in the transaction.
- The builder is not introducing the vessel into U.S. interstate commerce, is not attempting to circumvent U.S. requirements, and is not subject to U.S. regulations.
- The purchaser must still obtain and affix the required HIN through the process in 33 CFR 181.23(b).



Canadian Imports

- The USCG recognizes Canadian MICs; they are issued from the same pool of 3-letter combinations as U.S. MICs. Canadian MICs typically start with Q, Y or Z.
- Canada accepts foreign HINs, the U.S. does not.
- A Canadian import must have the Canadian MIC/HIN applied to the vessel in order to comply with U.S. regulations.
- States should verify the MIC/HIN using the USCG database.
- Do **NOT** register the vessel if the MIC/HIN is not valid.



When the evidence conflicts, stop and refer. Do not use a state-assigned HIN for a questionable import.

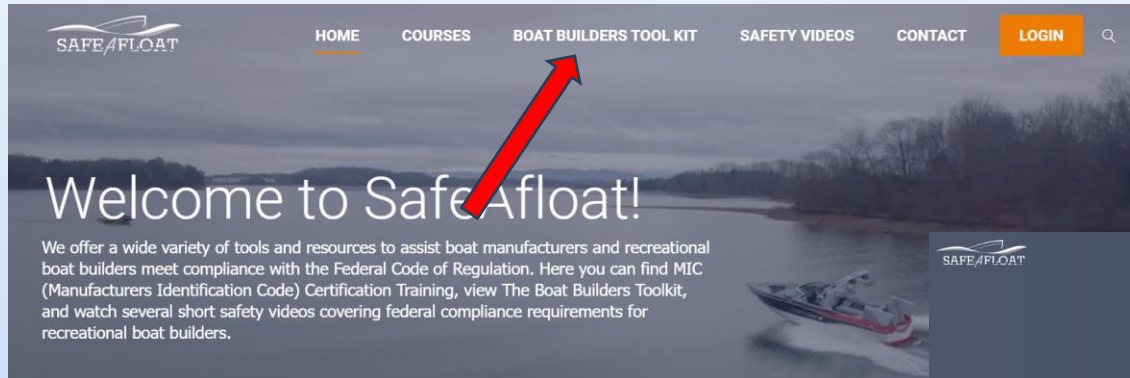


Resources

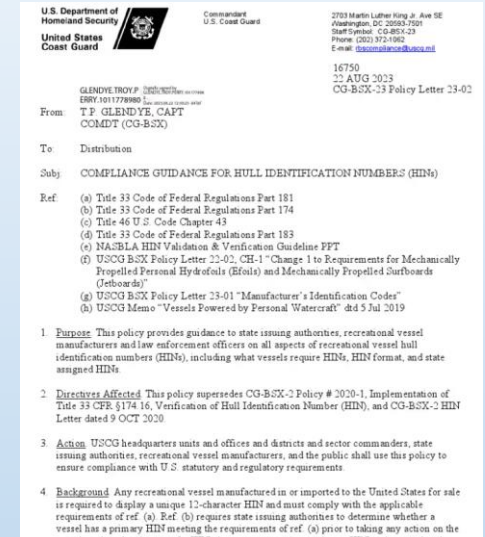
- USCG MIC Database - www.uscgboating.org
- CG-BSX Policy Letters - www.safeafloat.com
- NASBLA VIRT Resources - www.nasbla.org



Where to find the current HIN Policy



www.safeafloat.com



SAFEAFLOAT

HOME COURSES BOAT BUILDERS TOOL KIT SAFETY VIDEOS CONTACT LOGIN

Policy

Home / Policy

Title	Option	Size
[BSX-23 Policy #23-07] Adoption of SAE and ISO Personal Watercraft Standards as Equivalent to 33 CFR Subchapter S	Download	251Kb
[BSX-23 Policy #23-06] Definition of Canoes and Kayaks	Download	233Kb
[BSX-23 Policy #23-02] Compliance Guidance for Hull Identification Numbers (HINs)	Download	354Kb
[BSX-23 Policy #22-02 CH-1] Change 1 to Requirements for Mechanically Propelled Personal Hydrofoils (Efoils) and Mechanically Propelled Surfboards (Jetboards)	Download	219Kb
[BSX-23 Policy #22-02] Safe Loading, Safe Powering and Flotation Compliance Guidance for Electrically Powered Recreational Vessels	Download	225Kb
[BSX-23 Policy #22-01] Recreational Boat Exemptions & Equivalencies	Download	222Kb
[BSX-23 Policy #21-01] Boat testing procedures for O/B Boats greater than 2HP	Download	1,755Kb
[BSX-23 Policy #19-01] Vessels Powered by Personal Watercraft	Download	206Kb
[BSX-23 Policy #17-01] Hull Identification Numbers for Paddleboards and Kiteboards	Download	119Kb

State of Wisconsin
Department of Natural Resources
DNR Processing Center
PO Box 78701
Milwaukee, WI 53278-0701
dnr.wis.gov

Affidavit for Self-Imported Vessels

Form 8400-XXX (5/26)

Page 1 of 3

IMPORTANT: A vessel purchased over the internet from a foreign country, where they buyer did NOT personally transact in the host country to arrange shipping, is NOT a legal self-import and does not qualify to receive a state Z number.

Notice: This form does not circumvent or replace any required documents, applications, fees or signatures. s. 30.547, Wis. Stats. Any person who knowingly makes a false statement in an application for a certificate of title may be fined not more than \$10,000 or imprisoned not more than 6 years, or both. This notarized statement becomes part of your application. Read the instructions before completing this form. All fields on this form must be completed, unless indicated otherwise.

A. Affiant Information			
Affiant Name (Last, First, Middle Initial)			
Mailing Address			
City		State	ZIP Code
B. Boat information			
Construction Start Date	Construction Completed Date	Boat Length _____ ft. _____ in	Boat was built for (select one): ☐ Personal Use ☐ Commercial Use (i.e. Barge)
Foreign Builder (company name):		Specific Location of Build Site (address):	
USCBP Port of Entry (provide copies of customs documents):			
C. Read each statement and initial that you agree:			
☐ I hereby certify that I did not purchase the said vessel over the internet from a foreign seller and personally arrange for the shipping/transport to the United States.			
☐ I hereby certify that the vessel described above has never been previously registered or titled with the State of Wisconsin or in any other state or country, and that a Manufacturer's Statement of Origin or Builder's Certificate has never been issued for said vessel.			
☐ I hereby certify that said vessel was built for my personal use and I have no intention of selling it within 10 years of the issuance of the state-issued hull identification number.			
☐ I hereby certify that I will follow guidelines provided in permanently affixing the state-issued hull identification number.			
D. Signature and Certification			
By signing this document, I certify the information and statements I have given on this form are true, accurate, and complete to the best of my knowledge. I further certify that no material information regarding this vessel has been omitted. I also agree that in consideration of the issuance of a certificate of title, based on the affidavit made by me, do agree to indemnify the State of Wisconsin, Department of Natural Resources, or such person or legal entity suffering a damage judgment resulting from any illegalities of this request to title, and shall defend at my expense any and all litigations which may arise as a result of the issuance of transfer and title for the above-described property.			
Signature of Affiant			Date

STATE OF _____)
) ss.
_____, County)

Subscribed and sworn to before me this date _____

(Notary Public Signature)

Notary Public of _____ County
☐ My commission (is permanent) ☐ (expires _____).



Quick Reference Checklist: Self-Imported Vessel vs. Commercial Import

Ref: *This checklist was created to assist states in determining whether a vessel qualifies as a legitimate self-import (personal use, imported by the owner) versus an illegal commercial import that requires a U.S.-based importer with a USCG-assigned Manufacturer Identification Code (MIC). Reference documents: NASBLA Best Practices for Self-Imported Vessels; USCG Policy 23-02 — Compliance Guidance for Hull Identification Numbers; 33 CFR §181.23, §181.31; 46 USC §4307.*

⚠ IMPORTANT: A vessel purchased over the internet from a foreign country, where the buyer did NOT personally transact in the host country or arrange shipping, is **NOT** a legal self-import and should not receive a state Z number. If Section 1 indicators point to an illegal commercial import, do not proceed further — refer to USCG CG-BSX-23 (micapp@uscg.mil).

Owner/Applicant Name: _____ DOB: _____ DL #: _____

Address: _____ State: _____

ZIP: _____

YES	NO	N/A	QUESTION / INDICATOR
SECTION 1: Purchase & Importation Method — Determining Self-Import Eligibility			
☐	☐	☐	Did the individual personally travel to the foreign builder's country to complete the purchase transaction? <i>A true self-import requires the buyer to have personally conducted a transaction in the host country. If NO, this vessel is likely an illegal commercial import.</i>
☐	☐	☐	Did the individual personally arrange for the shipping/transport of the vessel to the United States? <i>Per USCG Policy 23-02, the buyer must arrange shipping themselves. A vessel shipped directly by the foreign builder to the buyer does NOT qualify as a self-import.</i>
☐	☐	☐	Was the vessel purchased over the internet from a foreign seller without the buyer personally transacting in the host country? <i>If YES, this is NOT a legal self-import. The foreign builder is acting as a de facto importer without a USCG-required MIC. STOP — do not issue a Z number.</i>
☐	☐	☐	Was the vessel shipped directly from the foreign manufacturer to the buyer (drop-shipped)? <i>Direct shipment by the foreign builder circumvents USCG inspection requirements and MIC/HIN regulations.</i>
☐	☐	☐	Did the buyer provide U.S. Customs and Border Protection (CBP) Port of Entry documentation? <i>CBP import entry documentation is a key indicator that the vessel legally entered the U.S. Absence of CBP documents is a red flag.</i>
☐	☐	☐	Has the individual provided a bill of sale from the foreign builder? <i>A bill of sale showing the buyer's name and transaction details supports a legitimate self-import claim.</i>
☐	☐	☐	Has the individual provided a Manufacturer's Statement of Origin (MSO) or Certificate of Origin (COO)? <i>MSO/COO documents are used in numbering and titling. State authorities should</i>



Other Notable Laws and Regulations

1. 33 CFR 174.16 - Verification of HINs
2. 19 CFR 12.85 - Importation of nonconforming vessels and equipment
3. Potential for future new HIN Fraud Law. LCP in Progress.



Contact CG-BSX-23



- RBScompliance@uscg.mil



Q&A

