

Australian Builders Plate Standard – Edition 5

Consultation feedback summary

Purpose of this paper

This paper examines feedback received as part of a public consultation process. The comments informed the update to the *National Standard for the Australian Builders Plate for Recreational Boats – Edition 5 (the Standard)* that was endorsed by the Transport and Infrastructure Council on 5 June 2020.

This paper also documents the consultation review process and provides commentary from the Australian Recreational Boating Safety Committee (**ARBSC**) on the final draft of the Standard.

The Australian Builders Plate Standard

The Australian Builders Plate (**ABP**) Standard was first published in 2005 “in response to public demand for recreational boat safety and with the support of Australian boat builders”.¹

The ABP Standard seeks to enhance the safety of persons on recreational boats. It does this by ensuring that certain boats are fitted with ABPs that contain essential safety information applicable to that boat’s use. The ABP Standard specifies that some of the displayed ABP information, such as maximum loading masses, are determined in compliance with specified technical standards. This aims to ensure that a boat has adequate volume and capacity to safely support the recommended loading and passenger masses listed on the ABP.

The ABP Standard also provides for “a declaration by the builder or importer that the boat meets, to the extent specified within this Standard, the requirements of relevant national or international standards applicable to recreational boats”.²

For more information regarding the function of the ABP Standard and the reasons for its review, please read the *Consultation paper – Review of the ABP Standard*, which is available from [Maritime Safety Queensland](#).

For other information regarding the ABP Standard, please contact your local maritime safety agency.

¹ Page 6. “*National Standard for The Australian Builders Plate for Recreational Boats*”, Ed. 4, 2011, Australian Transport Council, available at: http://www.anzsbeq.com.au/files/7214/4920/4748/ABP_Ed_4.pdf

² Ibid, p.6

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Definitions

ABP – The Australian Builders Plate, which is affixed to recreational vessels as required by the National Standard for the Australian Builders Plate for Recreational Boats.

ABPWG – The Australian Builders Plate Working Group.

ARBSC – The Australian Recreational Boating Safety Committee.

Reference Group – The Australian Builders Plate Reference Group. A collaborative industry and government group formed to review ABP Standard consultation feedback and make recommendations to determine the final draft of the proposed ABP Standard update.

The Standard– The National Standard for The Australian Builders Plate for Recreational Boats.

Edition 4 – The National Standard for The Australian Builders Plate for Recreational Boats, published on 23 May 2011, accessible [here](#):

Edition 5 – The updated edition of The National Standard for The Australian Builders Plate for Recreational Boats, which was endorsed by the Transport and Infrastructure Council on 5 June 2020.

Specified Standards / Specified Technical Standards – Documents that determine vessel build standards and associated calculations. These are the three referenced standards in the National Standard for The Australian Builders Plate for Recreational Boats. The specified standards referenced are the relevant Australian Standard (**AS**), American Boat & Yacht Council (**ABYC**) Standard and the International Organisation for Standardisation (**ISO**) Standards.

The consultation process

Public comment on the draft ABP Standard update was received as part of a national consultation process conducted between 1 November 2019 and 31 January 2020.

Complementing the consultation process, public forums were held in Brisbane, Sydney and Melbourne. A total of 37 formal submissions were received over the three-month consultation period, 24 were responses to a consultation web-survey hosted by Maritime Safety Queensland and 13 were submitted by other means.

Of these submissions:

- 28 were supportive of the update
- 3 were against the update
- 6 were neutral.

It's noted that the Boating Industry Association (Australia) also made a detailed submission on behalf of its members.

To review consultation feedback and assist in the finalisation of the Standard update, a Reference Group was formed. This group consisted of industry and government representatives from across Australia. Group members included aluminium, fibreglass and polyethylene boat builders, major boat dealers and representatives from the Boating Industry Association (**BIA**), including the BIA Manufacturers Division.

The Reference Group met in Brisbane in February 2020. The group reviewed all received feedback and reached majority consensus on the final draft of the ABP Standard update.

General commentary on consultation feedback

The ARBSC extends its thanks to all parties who provided feedback on the proposed ABP Standard update.

Feedback received was overwhelmingly supportive of the need for an ABP Standard update, and of the form of the proposed Standard. Of note:

- the reformatting of the Standard was strongly supported for improving the ease of reading and understanding;
- the introduction of 'quick-reference' tables was strongly supported;
- making the 'area-of-operation' warning statement a mandatory requirement was strongly supported;
- requiring that flotation is fitted in compliance with the nominated standard received broad support; and-
- the introduction of the concept of 'full-accordance' (*which has subsequently been changed to the term "full-compliance"*) received broad support, noting that there may still be some ambiguity in requirements.

Consultation feedback also highlighted issues with the ABP Standard system, namely:

- there continues to be some ambiguity regarding when a party is responsible for fitting an ABP; and-
- the definition of a 'competent person' is problematic.

It should be noted that a significant amount of feedback was considered to exceed the scope of the ABP Standard or the review process. These issues have been summarised and provided to the appropriate bodies for consideration.

Finally, some feedback demonstrated a misunderstanding of the ABP system or the proposed update. In response it should be noted that:

- any update of the ABP Standard is not retrospective in its application. It will not apply to the existing boat fleet; boats must only comply with the ABP Standard applicable at the time of initial supply.
- the ABP Standard is currently in its fourth edition. It's a 'live' Standard that will be reviewed and updated when deemed necessary
- the requirement to comply with the ABP Standard is established in state and territory legislation, not the Standard itself
- the ABP Standard does not establish the technical methodology to calculate vessel loading values.

Specific feedback regarding consultation questions

The following chapter provides a high-level summary of the responses collected during the consultation process and highlights the actions recommended by the Reference Group. All positions represent the majority opinion of the Reference Group.

The Reference Group considered all feedback and took account of any majority support for a position in responses. However, the Reference Group was prepared to deviate from majority supported positions when alternative resolutions were deemed appropriate. A case in point was removing the ABP Standard's moderation of air-flotation requirements established in ISO standards.

A. Changes proposed in the ABP Standard update at the time of consultation.

Is the concept of "full-accordance" (in clause 3.3.3 of the proposed standard) clear regarding the requirements it places on a boat's builder when determining ABP values?

76% Yes | No 24%

REFERENCE GROUP POSITION:

- (1) Supported with amendment.
- (2) Recommend modification of the draft to use the phrase "Full Compliance" in place of phrase "Full Accordance", as it is more common terminology, with the same meaning.
- (3) Note that "full-accordance/full-compliance" is applicable to the specified standard sections as specified.
- (4) Agree that in respect to any new impositions on boat manufacturers, a transitional 12 month phase-in of the Standard update should be supported.
- (5) Recommend that work is undertaken between industry and regulators to provide education materials to the boating industry.

Do you support the requirement that a HIN is recorded on the plate in the first instance, with the 'build date' only permitted where a vessel does not have an assigned HIN?

71% Yes | No 29%

REFERENCE GROUP POSITION:

- (1) Supported. Build dates or HINs to be included. When a HIN is available, it should be used.
- (2) Strong support for implementation of a HIN requirement nationally. The ARBSC has agreed that a national HIN system is desirable and has committed to discuss and examine the BIA 'Smart-HIN' system.
- (3) Recommend marine safety agencies legislate mandatory HIN requirements. Recognition that the Standard is not the appropriate legislative pathway to introduce a national HIN scheme (out-of-scope).

Do you support the requirement that flotation is fitted in accordance with the requirements of the specified standard used?

81% Yes | No 19%

REFERENCE GROUP POSITION:

- (1) Supported.
- (2) Recommend that the ARBSC ensures marine regulators are monitoring stated ABP buoyancy for standard compliance.
- (3) Add a new clause for vessels over six metres, clarifying that boats over six metres may elect to include a buoyancy statement at the builder's discretion. Provide an example ABP template for boats over six metres if the builder chooses to declare buoyancy. This supports the optional arrangements currently in the specified standards.

Do you support removing auxiliary engine mass from the calculation of 'outboard engine mass' and placing it in the carry-on component of the 'maximum load'?

69% Yes | No 31%

REFERENCE GROUP POSITION:

- (1) Supported.
- (2) Note that accessories (including trolling motors) shall be included in the calculation of the maximum vessel load.
- (3) Recommend that AS1799 examines the lack of auxiliary outboard mass guidance and whether a maximum transom mass should form part of the AS1799 methodology.

Do you support the proposed changes allowing boat builders to nominate more conservative values in respect to outboard engine power, person capacity and maximum load?

84% Yes | No 16%

ABP REFERENCE GROUP POSITION:

- (1) Not supported.

- (2) Recommend deleting the reference from the draft Standard. The specified standards may or may not prescribe these types of weight movements within their own limits (*For example, AS1799-1.2009 clause 1.4.1.1 specifies where a builder may nominate conservative/lower values*). Leave clarification within the specified standards as they prescribe these calculations.
- (3) It's noted that this change is not consistent with the majority consultation feedback position. Removal of this clause is recommended to ensure the Standard does not moderate specified standard values. It should be noted that specified standards nominate when conservative values may be listed.
- (4) Engine mass and power must remain consistent. These must be taken from the specified standard used, i.e., full compliance.
- (5) Recommend substantial education in this area. Engaging with dealers specifically.
- (6) Recommend the inclusion of the following example: "Where the specified standards allow variances in calculated values, these may be utilised but not exceeded."

Do you support making the operating capacity warning a mandatory requirement?

84% Yes | No 16%

REFERENCE GROUP POSITION:

- (1) Supported with amendment.
- (2) Adjust requirement so the warning statement must be as per the specified standard guidance OR use the generic statement provided within the Standard.
- (3) Note the need for improved boater education regarding vessel area-of-operation capacities.
- (4) Recommend that AS1799 review their area-of-operation warning guidance.

Do you support making the flybridge warning a mandatory requirement?

100% Yes | No 0%

REFERENCE GROUP POSITION:

- (1) Supported.

Do you support the new requirements for the ABP location requirement?

88% Yes | No 12%

REFERENCE GROUP POSITION:

- (1) Supported.
- (2) Recommend that ARBSC drafts education materials for boat operators regarding where they should look for an ABP and how they should interpret it.

Is the responsibility for determining and fitting ABPs in the proposed Standard clear, especially noting proposed clause 3.2.2?

66% Yes | No 34%

REFERENCE GROUP POSITION:

- (1) Keep clause but remove the 'boat-dealer' examples. While the intention of providing greater guidance regarding the responsibilities for fitting an ABP is supported, it's noted that these requirements are established in state and territory legislation. It's not recommended that these examples are specified within the Standard as jurisdictions may vary requirements under relevant law.
- (2) Recommend that the ARBSC and the BIA clarify and communicate clear responsibilities, with the objective of national consistency.
- (3) Review importer examples considering implications on state and territory legislation.

Do you support the general restructure of the Standard?

88% Yes | No 12%

REFERENCE GROUP POSITION:

- (1) Supported as drafted, with amendments as recommended herein.

Are there any further structural changes you would like made to the Standard?

41% Yes | No 59%

REFERENCE GROUP POSITION:

- (1) Recommend changing the person number presentation on an ABP, so the ABP reads: *"PERSON: XX or not exceeding XXXkg"*.

Following substantial feedback regarding the presentation of person numbers on the ABP and noting the negative market impact of the current person number presentation, the Reference Group formed majority agreement that the most important person number considerations were:

- a) That the person mass as calculated from the specified standard is not exceeded when a boat is operated.
- b) That boat operators are provided with accurate maximum loading and person mass guidance derived from specified standards.
- c) That boat operators hold the primary responsibility for determining safe vessel load in respect to passengers carried and the suitability of operational conditions.
- d) That small volume boats such as car toppers can be safely operated when person loading numbers are exceeded, if person mass and maximum load are adhered to and adequate seating/other person considerations are adhered to.

This change does not modify the specified standard methodology used to determine person load.

In respect to the implications of this change, consideration was given to the different regulatory systems that require boat operators to abide by the ABP's person guidance. It was noted that some jurisdictions allow for children to be considered as 0.5 persons for the purposes of the ABP max person load. It's understood that each jurisdiction's regulatory approach will be informed by its respective legislation.

The Reference Group's intention is to allow boats to be operated in excess of the person number recommended on the ABP when person mass is not exceeded.

It's noted that there was not 100% agreement within the group with respect to this change.

Are there any specific clauses in the proposed Standard that remain confusing and ambiguous?

52% Yes | No 48%

REFERENCE GROUP POSITION:

- (1) That the ARBSC, BIA and marine regulators consider the creation of relevant education materials for builders, dealers and importers providing greater clarification of ABP responsibilities.
- (2) That several associated clarity and guidance recommendations are passed to the AS1799 review committee or the BIA as appropriate for consideration.

Please provide any other feedback regarding the proposed Standard.

REFERENCE GROUP POSITION:

- (1) Agree that the option to include a buoyancy statement for boats over six metres is currently available for inclusion by the builder.
- (2) Agree to include in the proposed Standard a clause regarding the fitting of an optional flotation statement for boats six metres and over, and a corresponding ABP template.
- (3) Confirm that marine safety agencies are committed to raising the level of activity around the education and enforcement of the ABP system.

B. Questions regarding changes not proposed in the Standard update.

Would you support the introduction of mandatory build standards for recreational vessels?

75% Yes | No 25%

REFERENCE GROUP POSITION:

- (1) Note that the BIA (Australia) is examining the merits of a manufacturer accreditation program, similar to the US National Marine Manufacturers Association accreditation regime.
- (2) Recommend that the ARBSC continue to monitor and engage with industry regarding Australian recreational boat standard requirements.

Should the National Standard for Commercial Vessels (NSCV) be added as an ABP specified standard?

60% Yes | No 40%

REFERENCE GROUP POSITION:

- (1) Not supported as a recommendation at this stage, because of the delays that would be caused by examining the inclusion of this system. Recommended for future ABP update consideration.
- (2) Agree that the NSCV C6B may provide an equivalent alternate means to address the buoyancy performance of a vessel to determine ABP information.

Other values may or may not be able to be determined from other parts of the NSCV, but a full examination of suitable NSCV provisions would be required.

- (3) Note that inclusion of NSCV C6B would require a dedicated resource investigation to ensure its inclusion in the Standard did not have unintended consequences.

Should any other standards be included as ABP specified standards?

58% Yes | No 42%

REFERENCE GROUP POSITION:

- (1) Recommend that ABYC H-28 and H-35 are specified within the ABP standard draft.

- (2) Recommend several National Marine Manufacturers Association and American Boat and Yacht Council references are updated.
- (3) Recommend clause that the specified standard must be: “the valid edition of that standard at the commencement of the construction of that boat.”
- (4) Agree that there’s no intention to include additional international standard systems at this point.

Could the ABP requirements be better determined using a set of tests which are required to determine values without reference to any current specific standards?

44% Yes | No 56%

REFERENCE GROUP POSITION:

- (1) Not supported.
- (2) Agree that the specified standards are the appropriate tools to determine ABP values.
- (3) Recommend that AS1799 considers the inclusion of a practical testing methodology.

Should the Standard allow boat builders to nominate the actual outboard engine and fittings mass (as opposed to the mass contained in the specified standards)?

62% Yes | No 38%

REFERENCE GROUP POSITION:

- (1) Not supported.
- (2) Continue using the masses prescribed within the specified standards. Support the principle that the specified standards establish the calculation methodologies.
- (3) Recommend that AS1799 examines current outboard and associated equipment masses to update the *outboard mass table* and considers the inclusion of actual masses as an alternative methodology.
- (4) Agree to add a note that “*a boat builder may consider also including a maximum transom mass on the ABP.*”

Should the Standard allow boat builders to nominate the actual outboard engine and fittings mass, and then reallocate any mass savings to “carry-on” load?

40% Yes | No 60%

REFERENCE GROUP POSITION:

- (1) Not supported.
- (5) Continue using the masses prescribed within the specified standards. Support the principle that the specified standards establish the calculation methodologies.
- (2) Recommend that education is released through the BIA and regulators to industry and community around responsibilities when repowering.

- (3) Recommend the development of education for 'competent persons' regarding how mass is calculated and what to display on the plate in varied circumstances, *for example, twin outboard propulsion.*

Should the Standard allow boat builders to nominate the actual outboard engine and fittings mass and then reallocate any mass savings to maximum person capacity?

40% Yes | No 60%

REFERENCE GROUP POSITION:

- (1) Not supported.
- (2) Continue using the masses prescribed within the specified standards. Support the principle that the specified standards establish the calculation methodologies.
- (3) Recommend education materials are developed by the BIA and the ARBSC regarding the choice of specified standards.

Should the Standard be modified in respect to person number requirements?

44% Yes | No 56%

REFERENCE GROUP POSITION:

- (1) *As agreed above*, changed the person number presentation on an ABP, so the ABP reads: "*PERSON: XX or not exceeding XXXkg*".

Should the requirement that the two largest air compartments be flooded be removed from the Standard?

35% Yes | No 65%

REFERENCE GROUP POSITION:

- (1) Supported.
- (2) Recommend the removal of this section/moderation to reflect 'full compliance' with the specified standards (*for example, allow flotation in full compliance with the specified standards*).

ISO standards allow air buoyancy chambers without requiring the two largest air compartments be flooded, in contrast to AS1799.1. The ISO standards mitigate the associated risks in this circumstance with rigorous pressure testing and labelling requirements.

- (3) It's noted that this change is not consistent with the majority consultation feedback position. Anecdotal evidence suggests that ISO standards remain the least popular specified standard scheme nominated by Australian builders. As such, the opinion of ISO experts within the Reference Group was considered sufficient to warrant this change.

Should the Standard mandate the size and shape of an ABP?

60% Yes | No 40%

ABP REFERENCE GROUP POSITION:

- (1) Not supported. Agree not to mandate the minimum size of the plate.

- (2) Note that many parties were unaware of the existence of non-rectangular or otherwise varied ABPs.

How can the Standard be improved to ensure that boat dealers can readily understand and comply with their requirements?

REFERENCE GROUP POSITION:

- (1) The Reference Group extensively considered the merits of the inclusion of a 'max accessories' value. As the specified standards don't provide methodologies to determine a 'max accessories' mass, and as accessories mass should already be considered in the maximum load, the group doesn't support this change.
- (2) Recommend AS1799 considers how accessories and auxiliary motor mass is determined and treated.
- (3) Recommend significant education and compliance work is undertaken in this space.
- (4) Recommend manufacturers and dealers improve their communication regarding the fitting of aftermarket accessories.

How can regulators improve the implementation of the proposed Standard?

REFERENCE GROUP POSITION:

- (1) Consider supporting the BIA to develop educational materials and deliver builder and dealer training.
- (2) Recommend increasing and improving education and enforcement programs.
- (3) Develop a consistent national approach to enforcement of the ABP Standard including education materials and industry audits.

How can industry improve the implementation of the proposed Standard?

REFERENCE GROUP POSITION:

- (1) Recommend the development of education material and the roll-out of ABP Standard training for industry parties.
- (2) Recommend that boat manufacturers and dealers consider engaging external competent persons to determine ABP values in a broader range of circumstances.
- (3) Recommend the development of a list of competent persons, including a monitoring scheme.
- (4) Recommend that the BIA (Australia) examine the feasibility of creating an ABP calculation worksheet.

Please provide any other feedback in relation to the ABP Standard, Australian recreational vessel standards or this review.

REFERENCE GROUP POSITION:

- (1) Recommend that the ARBSC clarifies when imports arriving into Australia must comply with the ABP Standard (for example, *define the initial point of supply*).

- (2) Recommend that the ARBSC supports public education messaging that a second-hand boat may not support the details that are on an ABP.

C. Additional responses to consultation feedback

As many of the consultation responses were free-text submissions, the Reference Group also addressed topics that were not aligned with the question posed. To protect the anonymity of consultation submissions, the individual free-text submissions have not been included in this document.

ABP REFERENCE GROUP POSITIONS:

- (1) Recommend that the ARBSC considers changes establishing that the ABP is valid for the life of a boat, rather than just at initial supply. This would introduce the requirement that modification of a boat (that invalidates the values on the ABP) requires a new plate be calculated and fitted. (*Out-of-scope for this review*).
- (2) Recommend changing the definition of Personal Watercraft to the ISO Personal Watercraft definition.
- (3) Ensure the measuring methodology is consistent in respect to boats six metres or more and boats up to six metres.
- (4) Recommend that AS1799 consider new diagrammatical explanations.
- (5) Recommend that the AS1799 review committee examines the Canadian Standard for small craft in respect to their float plane diagrams. Note that compliance with international standards and their capacity plate regimes is not considered a sufficient substitute for ABP Standard compliance. The ABP provides Australian boat operators with a standardised, metric capacity plate, that allows easy comparison across boat models available in Australia.
- (6) It's noted that the definition of a competent person remains problematic. Changes to this definition were considered but not resolved, largely because of the different circumstances in which ABPs are fitted (*for example, an importer may be competent to transfer ISO compliance plate values onto an ABP in line with ABP requirements, but not calculate the values from scratch*). It's stressed that the person responsible for fitting an ABP holds the responsibility to ensure the plate complies with the ABP Standard. They are encouraged to engage a competent party to calculate and fit an ABP on their behalf if necessary.

Regarding ABP Standard edition 5

Overview

Following an extensive review of Edition 4 and its implementation, the ARBSC recommended that an updated Standard should:

- i) Moderate the values obtained by the specified standards as little as possible.
- ii) Contain clauses written in clear English, without ambiguity between ABP definition clauses and specified standard definitions.
- iii) Ensure loading values listed on ABPs do not exceed those calculated from a specified standard.
- iv) Encourage level flotation for vessels measuring less than six metres.
- v) Update administrative references.

The Reference Group was guided by these recommendations.

Restructuring the ABP Standard

The ABP Standard Edition 5 contains relatively minor changes to the content (and subsequent requirements) of previous editions, however it proposes significant changes to the order and structure of the document.

Anecdotal evidence suggests that much of the ambiguity with the ABP Standard system arises from the complex structure of the current document. By proposing a major rethink of the structure, it's hoped that all users of the ABP Standard will benefit from a less bureaucratic, more practical document. Consultation feedback strongly supported the intent of the Standard restructure. Major structural changes include:

- i) The addition of a scope for each chapter, so readers may quickly locate desired information.
- ii) Improved logic of chapter titles.
- iii) Removal of definitions not used in the Standard.
- iv) Addition of definitions used in the Standard.
- v) Improvements to the consistency of terminology (*for example, it's proposed that 'relevant national or international standards', 'referenced standards', 'standard specified' or 'nominated standards' are now termed 'specified standards'*).
- vi) Moving requirements out of subordinate, small font notes into actual clauses.
- vii) Where clauses currently reference other chapters, bring the information together into a single clear clause.
- viii) Introduce a table identifying which specific standard is to be used for each item of information (*Eg. ABYC Buoyancy Values = ABYC H-8*).
- ix) Introduce a reference table listing vessel requirements, so a boat builder may easily understand what is required without flipping back-and-forward in the Standard.

This new structure provides a simpler presentation of information and should remove some ambiguity.

A. Proposed consultation draft changes that were not supported

Responsibility for determining ABP values (boat dealers)

The consultation draft of the ABP Standard (edition 5) proposed including a draft clause 3.2.2, containing specific examples for boat dealers, importers and other parties fitting aftermarket accessories to vessels. At the recommendation of the Reference Group, these examples have been removed.

While the Reference Group agreed that misunderstandings are still prevalent among the boating industry in respect to the responsibility for fitting and not-invalidating ABPs, it was agreed that this guidance was not an appropriate inclusion in the ABP Standard, as:

- state and territory legislation establishes the requirement for fitting ABPs, not the ABP Standard
- boat manufacturers have concerns over the safe modification of their vessels, and that the examples would be misinterpreted
- the specified standards are occasionally ambiguous in respect to the fitting of accessories
- the specified standards may provide scope for boat manufacturers to consider differing maximum load scenarios, including the consideration of aftermarket permanent fittings within the boats hull-mass.

The Reference Group instead recommends that significant education, training and compliance work is undertaken to ensure that ABP values are not invalidated.

Stipulating when an ABP may list conservative values

Consultation draft clause 3.4 proposed that outboard engine power capacity, maximum load and person capacity could be reduced at the discretion of the builder.

Noting that the specified standards currently allow for the reduction of calculated values in compliance with their own methodologies, this clause was considered an unnecessary addition. Furthermore, it was considered that the specified standards, as the documents establishing technical methodologies, should stipulate when and how values may be modified.

The Reference Group instead recommended the inclusion of the following note: "Where the specified standards allow variances in calculated values, these may be utilised but not exceeded."

Content Changes - ABP Standard edition 5

Overview

The following table summarises the key content changes within edition 5 of the ABP Standard, as determined following the 90-day public consultation period. This final draft was written under the supervision of the ABP Reference Group.

These changes to content are in addition to the significant restructure of the ABP Standard from edition 4.

COLUMN 1: NEW REQUIREMENT	COLUMN 2: RELEVANT NEW CLAUSE	COLUMN 3: SUPPORTING JUSTIFICATIONS
Exemption for personal watercraft compliant with ISO 13590.	<p>1.3 Application</p> <p>This Standard shall apply to any recreational boat, with the exception of the following types of recreational boats:</p> <p>f) Personal Watercraft intended to carry no more than two persons.</p> <p>g) Personal Watercraft compliant with ISO 13590.</p>	<p>ISO13590 capacity plates are considered a sufficient substitute for ABPs on PWCs.</p> <p>The majority of PWCs are fitted with ISO13590 compliant capacity plates, which provide consistency across the fleet in metric measurements.</p>
Add auxiliary outboard definition	<p>1.5 Terms and definitions</p> <p>auxiliary outboard—</p> <p>an outboard engine, of a lower power rating than the primary engine or engines, intended for use as an alternative means of mechanical propulsion to the primary means of propulsion. This includes reserve outboard motors and electric trolling motors.</p>	<p>Improve ABP guidance surrounding auxiliary motors, ensuring accurate loading guidance is provided and not invalidated.</p>
<p>Personal watercraft definition.</p> <p>Amend definition of PWC for consistency</p>	<p>1.5 Terms and definitions</p> <p>Personal Watercraft (PWC)—</p>	<p>Align ABP Standard definition with international standard definition.</p> <p>Ensure the ABP Standard covers emerging</p>

with the proposed ISO definition.	a watercraft intended for sports and leisure purposes of less than 4 m in hull length which uses a propulsion engine having a water jet pump as its primary source of propulsion and designed to be operated by a person or persons sitting, standing, or kneeling on, rather than within, the confines of a hull.	technologies such as electric powered PWCs. NOTE: At the time of drafting this document, ISO 13590 is in DIS (Draft International Standard) stage for a forthcoming update. The definition utilised is the proposed ISO13590 PWC definition, which is amended from the ISO13590-2003 definition.
Require an additional ABP on boats with a flybridge.	<p>2.2.1 Boats with a flybridge</p> <p>Where a boat is fitted with a flybridge an additional plate shall be affixed to the flybridge in a prominent position adjacent to the flybridge steering position.</p>	<p>Prevent vessel overloading.</p> <p>Address poorly located ABPs which may not be seen by operators.</p> <p>Note that the ABP system was initially implemented in partial response to a multiple fatality marine incident associated with an overloaded flybridge.</p>
<p>Elaborate on ABP location guidance.</p> <p>Clarify ABP location requirements without specifically mandating set ABP locations for different types of vessels.</p>	<p>2.2 Location</p> <p>The ABP shall be affixed to the boat in a prominent position, and shall be readily visible to the operator of the boat when getting the boat underway.</p> <p>To meet this requirement the plate shall be positioned in a prominent and visible location either:</p> <p>a) in the cockpit; or</p> <p>b) near the primary steering position.</p> <p>Where the design of the boat precludes placement in either of these locations, then the plate shall be placed in another prominent location on board the boat where it is readily visible to the operator of the boat when getting the boat underway.</p> <p>More than one ABP may be affixed to a boat to help</p>	<p>Address poorly located ABPs which may not be seen by operators.</p> <p>Clause 7.1 of the ABP Standard Edition 4 states: <i>“The ABP shall be readily visible to the operator of the boat when getting the boat underway, preferably in the cockpit or near the steering position.”</i> It has been identified that ABPs are frequently placed in locations contrary to this guidance.</p>

	satisfy this requirement. Where more than one ABP is affixed then the information contained on each of the plates shall be identical.	
Define the suitcase symbol displayed on an ABP.	2.6 Table 2 all elements of maximum load not represented by person and outboard mass	Ensure the ABP Standard definition is consistent with specified standard methodologies. Ensure all relevant aspects of a specified standard are complied with in respect to loading calculations. NOTE: While the suitcase symbol does represent carry-on load, it may also include other non-portable loads, as required by relevant specified standard methodologies.
Clarify that ABPs may include additional safety information at the discretion of the person fitting the plate.	2.9 Provision of additional safety information The person responsible for determining the information and fitting the plate, may also provide additional safety or product information on the ABP. This shall be displayed in the space provided on the ABP for such a purpose. The inclusion of this information shall not impair the legibility of the information that is required by this Standard to be displayed.	Ensure compliance with ABP Standard Objective (b) <i>b) ready access to essential safety information on the limitations applicable to the use of the boat to encourage appropriate and responsible use of the boat;</i>
Responsibility for determining and fixing ABP. Clarify the responsibility for determining and fixing ABPs.	3.2.2 Responsibility for determining the information to be displayed The boat's builder shall be responsible for determining the information to be displayed on an ABP and for ensuring the ABP is affixed to the boat, in full compliance with this standard. <i>[The above clause is an abridged transcript of the original]</i>	Prevent vessel overloading Ensure ABP values are not invalidated before first sale to a customer. The ABP standard, as enacted by state legislation, requires boat manufacturers, importers and dealers to ensure that when new recreational boats are supplied to boaters, they comply with the ABP Standard. However, it has been noted that there is some confusion about

		the existing responsibility of boat suppliers (especially boat dealers who modify boats to the point of invalidating ABP values) to ensure that ABP requirements are met.
<p>Addition of the term and concept of Full Compliance.</p> <p>This concept is used to communicate the requirements for a boat builder when calculating ABP values.</p>	<p>3.3.3 Full compliance with the specified standard/s</p> <p>When determining the information to be displayed on a boat’s ABP, the person responsible for determining the information shall ensure that:</p> <p>a) all calculations and tests required by the specified standard for the particular item on the plate are undertaken in full compliance with the requirements of that standard; and</p> <p>b) all considerations within the specified standard relevant to the information required to be displayed on the ABP are met.</p>	<p>The concept is intended to reduce ambiguity and clarify what a boat builder must do to comply with the ABP Standard.</p> <p>By ensuring listed ABP loading values are calculated in full compliance with specified technical standards (including mass, person area constraints, stability, down flooding calculations) instances of overloading (within listed ABP values) should be reduced.</p>
<p>Removal of level flotation moderation.</p> <p>(Removal of current ABP Standard Clause 9.5 “Buoyancy Information” – Note 2.)</p> <p>Previous ABP Standard editions have allowed builders to fit either basic or level flotation, regardless of the flotation type required by the specified standard selected.</p> <p>Under the new Standard, flotation must be fitted in accordance with the requirements of the standard used. As such, most outboard powered vessels (under 6 m) using ISO or ABYC as their nominated standards will now be required to fit level</p>	<p>3.3.3 Full compliance with the specified standard/s</p> <p>EXAMPLE 4</p> <p>Full compliance requires that a boat’s builder shall ensure that where the specified standard requires that level flotation be fitted to a boat, the boat shall have level flotation fitted, list the term “level flotation” and meet all the requirements of that standard to achieve level flotation.</p> <p>Table 4— Requirements for the information to be displayed on an ABP</p> <p>Row 7. Buoyancy Statement</p> <p>In determining the flotation performance of the boat, the specified standard chosen for determining all</p>	<p>Level flotation provides for better safety outcomes than basic flotation.</p> <p>Specified standard values are intended to be accompanied by the buoyancy performance specified (in said standard).</p> <p>ABP values are dependent on the specified standard being properly applied. By eroding the specified standard flotation requirements, the methodology of the specified standard is undermined.</p> <p>This may undermine the intended safety performance of a boat in a boating incident.</p> <p>The ABP Standard is not a technical standard, and it should not seek to specify technical</p>

<p>flotation.</p> <p>This means boat builders must choose a standard that allows basic flotation (eg. AS1799-2009) if they wish to fit basic flotation.</p>	<p>other information on the ABP shall be used.</p> <p>Where the specified standard requires that level flotation be fitted to the boat, the boat shall:</p> <p>a) have level flotation fitted;</p> <p>b) list the term “level flotation” on the plate; and</p> <p>c) meet all the requirements of that standard to achieve level flotation.</p>	<p>requirements that contradict specified standards.</p>
<p>Provide generic guidance regarding the fitting of optional semi-permanent or permanent fittings and the subsequent impact on ABP values.</p> <p>Applicable to vessels prior to their initial supply to a consumer.</p>	<p>3.3.4 Optional semi-permanent or permanent fittings</p> <p>The addition of optional semi-permanent or permanent fittings to a boat, such as trolling motors and their batteries or tower frames, awnings, etc., should be considered by the person responsible for determining the values on an ABP in compliance with the specified standard.</p> <p>A person modifying a boat should understand if the ABP values were determined including optional semi-permanent or permanent fittings.</p>	<p>Prevent vessel overloading.</p> <p>Ensure all relevant aspects of a specified standard are complied with in respect to loading calculations.</p> <p>Improve ABP guidance surrounding auxiliary motors, ensuring accurate loading guidance is provided and not invalidated.</p>
<p>Insert table specifying current standards used to determine individual pieces of information on an ABP.</p>	<p>Table 3—Specified standards</p>	<p>Improve ease of use of the ABP Standard.</p>
<p>Insert table listing how each item of ABP information is determined.</p>	<p>Table 4—Requirements for the information to be displayed on an ABP</p>	<p>Improve ease of use of the ABP Standard.</p>
<p>Move auxiliary engine mass from outboard engine mass to maximum load.</p> <p>The ABP Standard edition 4 required that auxiliary outboard mass (eg. trolling or reserve outboard masses) were</p>	<p>Table 4— Requirements for the information to be displayed on an ABP</p> <p>Row 6. Maximum Load</p> <p>The maximum load capacity displayed shall be the</p>	<p>Reduce moderation of the specified standards and improve the logic of the ABP Standard.</p> <p>Treating auxiliary engine mass as outboard mass is inconsistent with the requirement that maximum outboard engine mass should be</p>

<p>considered as part of the ABP's maximum outboard mass.</p> <p>Auxiliary outboard mass (and associated equipment) must now be considered as part of an ABP's generic maximum load, in compliance with the requirements of the specified standard.</p>	<p>maximum load for the boat as determined in accordance with the specified standard, and shall include, as a minimum, the sum of the following items:</p> <p>d) The mass of any auxiliary outboard engine that may be carried.</p> <p><i>[The above clause is an abridged transcript of the original]</i></p>	<p>determined from a specified standard.</p> <p>When a boat may be fitted with an auxiliary engine, the mass of the auxiliary engine and associated masses (batteries, mounting brackets, etc) are allocated mass from the vessels maximum load in line with specified standard requirements.</p>
<p>Change display of person number and mass on an ABP.</p> <p>Provide scope (where supported by jurisdictional legislation) for boats to be operated when person loading numbers are exceeded, if person mass and maximum load are adhered to and adequate seating/other person considerations are adhered to.</p>	<p>Table 4— Requirements for the information to be displayed on an ABP</p> <p>Row 5. Person capacity</p> <p>The person capacity displayed shall be the person capacity for the boat as determined in compliance with the specified standard, displayed as:</p> <p>a) the number of persons for the boat, expressed as a whole number; and</p> <p>b) the maximum total mass of persons for the boat, expressed in kilograms.</p> <p>The value determined shall be displayed alongside the text "Number persons" or the person symbol.</p> <p>The text "or not exceeding" shall be displayed on the plate between (a) the number of persons for the boat and (b) the maximum mass of persons for the boat.</p> <p>EXAMPLE</p> <p>Number persons # or not exceeding XXX kg</p>	<p>Following substantial feedback regarding the presentation of person numbers on the ABP and noting the negative market impact of the current person number presentation, the Reference Group formed majority agreement that the most important person number considerations were:</p> <p>a) That the person mass as calculated from the specified standard is not exceeded when a boat is operated.</p> <p>b) That boat operators are provided with accurate maximum loading and person mass guidance derived from specified standards.</p> <p>c) That boat operators hold the primary responsibility for determining safe vessel load in respect to passengers carried and the suitability of operational conditions.</p> <p>d) That small volume boats such as car toppers can be safely operated when person loading numbers are exceeded, if person mass and maximum load are adhered to and adequate seating/other person considerations are adhered to.</p>

		<p>This change does not modify the specified standard methodology used to determine person load.</p> <p>In respect to the implications of this change, consideration was given to the different regulatory systems that require boat operators to abide by the ABP's person guidance (noting that some jurisdictions allow for children to be considered as 0.5 persons for the purposes of the ABP max person load). It is understood that each jurisdiction's regulatory approach will be informed by their respective legislation. The Reference Group's intention is to allow boats to be operated in excess of the person number recommended on the ABP, when person mass is not exceeded.</p>
Remove air buoyancy compartment moderation, ensuring the ABP Standard accepts buoyancy compliant with the specified standards.	<p>Table 4— Requirements for the information to be displayed on an ABP</p> <p>Row 7. Buoyancy Statement</p> <p>REMOVED-</p> <p>Where air compartments are used as a source of buoyancy, regardless of which technical standard is employed, the buoyancy shall be assessed with the two largest air compartments flooded. If the technical standard requires more air compartments to be flooded, in addition to the two largest, that more onerous requirement shall apply.</p>	<p>Removal of this section/moderation to reflect full compliance with the specified standards. <i>(for example, allow flotation in full compliance with the specified standard).</i></p> <p>Reduce moderation of the specified standards and improve the logic of the ABP.</p>
Insert optional buoyancy statement for boats over 6 m and include an additional example ABP template to reflect this scenario.	<p>Table 4— Requirements for the information to be displayed on an ABP</p> <p>Row 8. Optional Buoyancy Statement</p>	Encourage builders of boats over 6 m to fit and test their boats buoyancy.

	<p>FOR BOATS 6 METRES OR MORE IN LENGTH ONLY</p> <p>Boats 6 metres or more in length may elect to display a buoyancy statement on the ABP.</p> <p><i>[The above clause is an abridged transcript of the original]</i></p>	
<p>Change from optional to mandatory warning statements.</p> <p>The ABP Standard Edition 4 contains an optional warning statement regarding the decreasing of loading masses in certain conditions (reduction of load). For boats with a flybridge, it also includes an optional warning statement regarding safe passenger numbers to be carried on the flybridge.</p> <p>Edition 5 makes these statements mandatory (where applicable); and requires that the reduction of load warning statement references the intended operational limitations of the boat consistent with the specified standard used.</p>	<p>Table 4— Requirements for the information to be displayed on an ABP</p> <p>Row 10. Warning statement 2 – Operating capacity</p> <p>The operating capacity warning statement displayed shall be a statement/s providing information to the consumer as to any operational limitations, or reductions required to the maximum load or maximum person capacity in different operating conditions (eg.: weather, operational area, time of day).</p> <p>The operating capacity warning statement/s should be consistent with the provisions of the specified standard used.</p> <p>EXAMPLE (relevant for AS1799)</p> <p>WARNING – the values on this plate have been calculated for operations in PROTECTED waters. The maximum persons and maximum load should be reduced in bad weather, or when the boat is operated outside these waters. Refer to the owner’s operating manual for more information.</p> <p>Where it is not suitable to display an operating capacity warning statement consistent with the provisions of the specified standard, the following</p>	<p>An improved and mandatory warning statement will assist boat operators to adhere to safe loading practices and better understand the limitations of their vessels. This should assist risk mitigation in relation to vessels operating in unsafe conditions.</p> <p>Ensure compliance with ABP Standard Objective (b)</p> <p><i>b) ready access to essential safety information on the limitations applicable to the use of the boat to encourage appropriate and responsible use of the boat;</i></p>

	<p>statement shall be displayed:</p> <p>a) WARNING - The maximum persons and maximum load should be reduced in bad weather, or when the boat is operated in adverse conditions.</p> <p>The operating capacity warning statement/s may refer to the boat's operating manual.</p> <p>If the warning symbol is used, the text "warning" at the beginning of this statement may be omitted.</p>	
<p>Require that where a HIN is already affixed to a boat, the HIN must also be displayed on the ABP.</p> <p>Where a HIN is not present, the ABP may instead provide the build date, as permitted by previous Standards.</p>	<p>Table 4— Requirements for the information to be displayed on an ABP</p> <p>Row 11. HIN Number</p> <p>The HIN number of the boat shall be displayed on the ABP.</p> <p>Where the boat does not have a HIN number, then the build date shall be displayed as the month and year of production, expressed numerically as MM/YYYY.</p>	<p>Ensure the best available information is provided on the ABP.</p> <p>Decrease the possibility of mixing/swapping ABPs between vessels.</p>
<p>Removal of standard: ISO 11192—Small craft – Graphical symbols</p> <p>The current Standard states "Any symbol used shall be as specified in ISO 11192, or as illustrated in this standard."</p>	<p>N/A – removed from Standard.</p>	<p>As the Standard contains all allowable ABP symbols, the inclusion of ISO11192 is unnecessary and a potential cost burden.</p> <p>ISO 11192 does not contain a person symbol, outboard symbol or suitcase symbol. It is only relevant for a warning symbol, which is already illustrated in the Standard.</p>

