

# Consultation Paper

Australian Recreational Boating Safety Committee



## Review of the ABP Standard

---

**DATE: October 2019**

### **Purpose of this Paper**

This consultation paper explains and supports the changes to the *Australian Builders Plate Standard for Recreational Boats* (ABP Standard) proposed by the *Australian Recreational Boating Safety Committee* (ARBSC).

The proposed changes address issues identified since the publication of the current ABP Standard (2011). They're intended to improve safety outcomes to meet the original aim of the standard; clarify parts of the standard where there may be ambiguity in its interpretation; and make the standard easier to read and apply.

This paper is accompanied by draft proposed ABP Standard (edition 5) containing the proposed changes.

The changes contained within the proposed ABP Standard may be subject to change following public consultation.

### **Development of the consultation draft**

To ensure a nationally consistent approach between marine regulators, the initial stages of this review were conducted by a government working group comprising representatives from each of the Australian marine regulators.

The consultation phase will ensure adequate opportunity for any interested parties to participate in this review and provide comment on the proposed Standard.

### **The consultation process**

Initial consultation on this draft will be open for public comment between 1 November 2019 and 31<sup>st</sup> December 2019.

A reference group comprising industry and government representatives will be formed to review written submissions, incorporate feedback and provide advice back to the ARBSC.

### **Have your say**

To make a submission on the proposed ABP Standard, please complete the questionnaire at: <http://msq.qld.gov.au/About-us/News-and-stories/Australian-Builders-Plate>

### **For more information**

The relevant marine authority contacts for this consultation can be found at: <http://msq.qld.gov.au/About-us/News-and-stories/Australian-Builders-Plate>

# 1. 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.

**ABP Standard** – The current edition (edition 4) of the National Standard for The Australian Builders Plate for Recreational Boats, accessible [here](#):

**ABPWG** – The Australian Builders Plate Working Group.

**ARBSC** – The Australian Recreational Boating Safety Committee.

**Small volume vessel** – A boat that in its volume (as determined by the volume beneath the assigned static float plane) provides a lower level of buoyancy able to support lower passenger loading numbers. For the purposes of this paper, a boat under 4.5 metres in length is considered a small volume vessel.

**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.

## 2. The Australian Builders Plate (ABP) Standard

The ABP Standard was first published in 2005 and was introduced “*in response to public demand for recreational boat safety and with the support of Australian boat builders*”.<sup>1</sup>

The ABP Standard seeks to enhance the safety of persons on recreational boats, by ensuring that certain boats are fitted with Australian Builders Plates which 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 accordance 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 is also “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”.<sup>2</sup>

## 3. Introduction

### A. Background

Following a nationwide examination of *the National Standard for the Australian Builders Plate for Recreational Boats* and its application, the Australian Recreational Boating Safety Committee (ARBSC) recommended that a limited review of the ABP Standard be undertaken. This examination found widespread non-compliance with the current Standard. It identified that the Standard is ambiguous in parts and that it may have potential unintended and undesirable safety outcomes, such as vessel overloading.

---

<sup>1</sup> Page 6. “Introduction”, Australian Transport Council, *National Standard for The Australian Builders Plate for Recreational Boats*, Ed. 4, 2011 available at:

[http://www.anzsbeg.com.au/files/7214/4920/4748/ABP\\_Ed\\_4.pdf](http://www.anzsbeg.com.au/files/7214/4920/4748/ABP_Ed_4.pdf)

<sup>2</sup> Ibid, p.6

This review is considered “limited” as the recommended changes do not modify the original scope or objectives of the ABP Standard.

The nationwide examination of the ABP Standard was initiated following a triple fatality boating incident, in which vessel overloading was a contributing factor.

Investigation of this incident revealed that the vessels ABP displayed a maximum loading mass which was significantly heavier than the maximum mass determined in accordance with the specified standard. The vessel load (at the time of incident) was less than the maximum loading mass displayed on the vessels ABP. However, the load significantly exceeded the actual maximum (specified standard) mass that should have been displayed on the ABP. This finding led to a national examination of the application and outcomes of the current ABP Standard. The national examination has revealed systemic non-compliance with the ABP Standard.

The objective of this review is to more closely align the ABP Standard objectives and outcomes in relation to recreational boating safety. It is intended to produce a clear, easily understood ABP Standard for boat builders to use. A reviewed ABP Standard will also address outdated administrative references and remove unnecessary specified standards.

## **B. Principle safety risk addressed by the ABP Standard:**

The ARBSC and all Australian maritime regulators accept that vessel overloading is a safety risk. The safety risk of vessel overloading has been demonstrated in numerous Australian boating fatalities.

Vessel overloading is a safety risk because:

- Vessel overloading reduces freeboard, meaning vessels are much more likely to sink, get swamped or flood.
- Sinking, swamping or flooding increases the chance of boaters unexpectedly entering the water.
- Unexpectedly entering the water raises a boater’s chance of drowning, cardiovascular or breathing problems, cold shock, hypothermia and exposure to environmental risks.
- Drowning, cardiovascular or breathing problems, cold shock, hypothermia and exposure to environmental risks increase the chance of a boater succumbing to serious injury or death.

In their endorsement of the ABP Standard, marine regulators have endorsed the AS, ISO and ABYC standards as the accepted measurements of safe vessel loading capabilities.

Concerningly, the ARBSC have found that currently, many ABPs list loading masses that significantly exceed the accepted AS, ISO and ABYC standard determinations of maximum load. Therefore, if boaters follow the loading recommendations on an ABP (as they are instructed to do) there is an unacceptable risk that they may overload their vessel.

Image: A basic definition of vessel overloading as a safety risk.

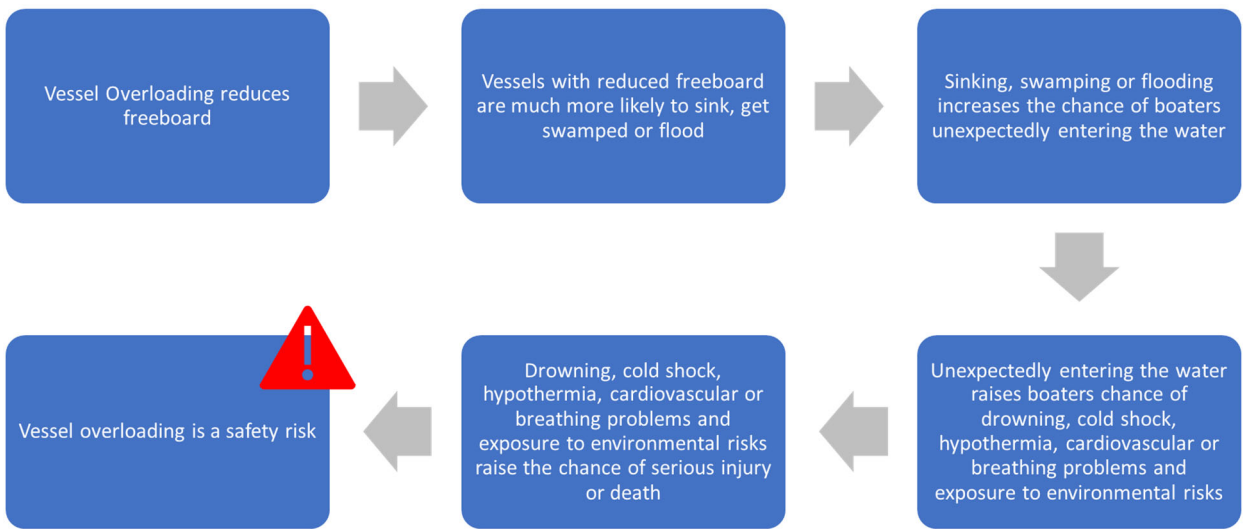
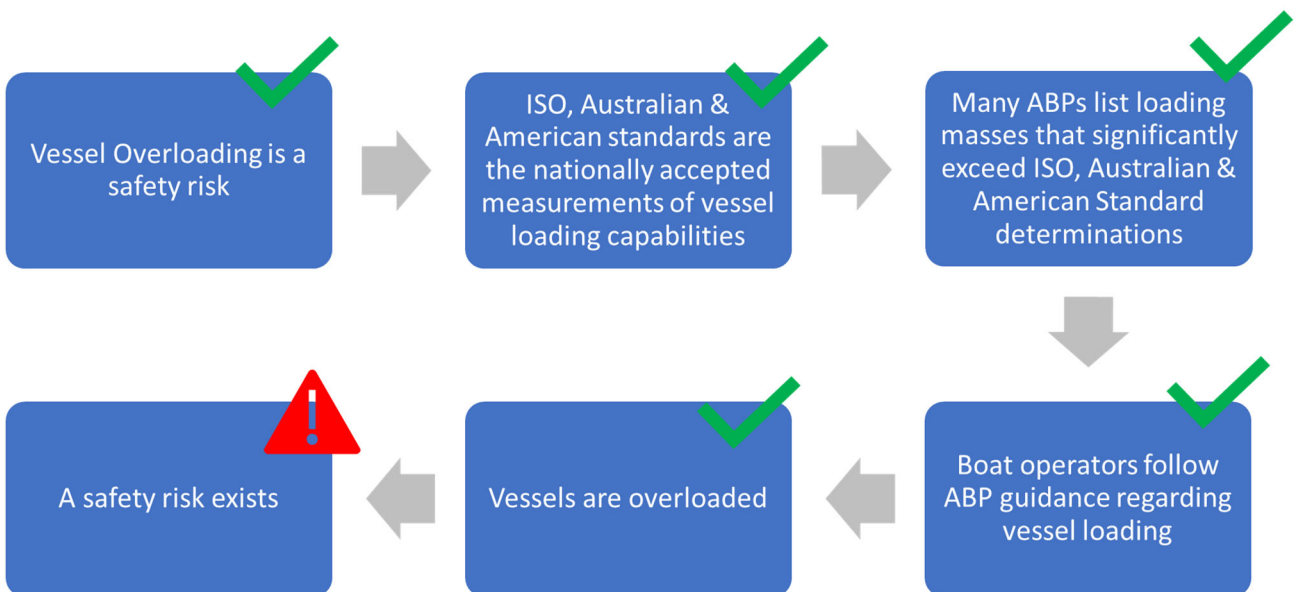


Image: Depiction of the “Principle safety risk” - the link between incorrect ABP loading values and the safety risk of overloaded vessels.



**C. Risk basis & evidence of the safety problem:**

Vessel overloading is frequently identified as a contributing factor (something that helps cause a result) in serious boating incidents and fatalities. However, vessel overloading is less often identified as a causal factor (a factor that if avoided or eliminated probably would have prevented the fatality). Typically, boating fatalities arise from a combination of contributing factors (rather than a sole causal factor), such as poor weather conditions, operator inexperience, unfit for purpose vessels, overloading and other factors.

Vessel overloading is not often identified as the sole causal factor in a marine incident. Typically, vessel overloading in combination with weather conditions and other factors precede marine

incidents. However, vessel overloading is very frequently present as a contributing factor in serious boating incidents.

While this review is supported where possible by specific evidence of poor safety outcomes arising from incorrect ABP values, it is also guided by the intent to avoid vessel overloading arising from non-specified standard derived ABP values.

Of note, audits of manufacturers and new boats have revealed systemic misapplication of specified standards and/or not using specified standard values at all when determining ABP values. As a result, loading values, particularly of small-volume vessels, have been shown to be significantly overestimated. This in-turn increases the likelihood of vessel overloading.

## **4. Australian Builders Plate Working Group**

The ABP Standard is currently in its fourth edition and was most recently reviewed in 2011. In pursuit of improved safety outcomes for Australian boaters, the ARBSC convened a national Australian Builders Plate Working Group (ABPWG), comprised of delegates from all Australian recreational boating safety regulators, to examine the ABP Standard.<sup>3</sup> The ABPWG membership included Naval Architects, Marine Surveyors, policy experts, regulatory and compliance practitioners and persons previously involved in the drafting the ABP Standard.

The ABPWG conducted a study of the ABP Standard, its application and its outcomes across all Australian jurisdictions. The study canvassed states for incident data, audit findings and included lessons learnt from inter-jurisdictional workshops, discussions with builders and factory visits. It was the finding of the ABPWG that the ABP Standard and its application are delivering unintended and undesirable safety outcomes for Australian boaters. These outcomes illustrate the ABP Standard has failed to meet its objectives.

The ABPWG determined that the best possible safety outcome of a reviewed ABP Standard would be the requirement that boats are manufactured to AS, ABYC or ISO standards (while keeping the ABP as a standardised source of safety information).

The findings of the ABPWG were accepted by the ARBSC, however it is believed that the substantive safety benefits of mandated specified standards could also be achieved by reducing their moderation in the ABP Standard and increasing active regulation of ABP compliance. In consideration of the perceived impost upon the boating industry if standards were mandated (and the likely cost and timeframe of changes) the ARBSC determined that a limited review of the ABP Standard was currently the appropriate course of action. The mandating of specified standards for boat construction remains a future option.

The ARBSC recommend that a reviewed ABP Standard should aim to:

- 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 6 metres.
- v) Update administrative references.

---

<sup>3</sup> Note - The Transport and Infrastructure Council subsumed the Australian Transport Council and its endorsing authority, and the ARBSC assumed responsibility for publishing the ABP Standard from the defunct National Marine Safety Council in 2011. It is in this capacity that the ARBSC convened the ABPWG.

## 5. Justification of Review Objectives

The proposed changes to the ABP Standard seek to achieve better safety outcomes for Australian boaters, in line with the existing objectives of the ABP Standard. The proposed Standard will improve clarity and ease of understanding, resulting in a more accessible product for boat builders.

Attached below are justifications of the objectives of the ABP Standard review.

### A. Moderate the values obtained by the specified standards as little as possible.

Correctly derived vessel loading values will increase the effectiveness of the ABP as a tool to drive increased safety, by addressing vessel overloading.

The ABP Standard was originally implemented by the National Marine Safety Committee to promote safer recreational vessels without mandating full compliance with specified standards.<sup>4</sup> It pursues this goal by requiring that values on ABPs are calculated using parts of a specified standard (AS/ISO/ABYC). This system was implemented in lieu of requiring vessels be manufactured to a specified standard.

It was the finding of the ABPWG that the optimum safety outcome for an ABP Standard review would be the mandatory requirement for boat builders to manufacture vessels to a specified standard. Requiring boats be built in full compliance with specified standards would bring Australian vessel regulation into line with the requirements of other OECD nations. It would ensure boats sold in Australia met a mandatory minimum standard in their design and build quality.

Requiring closer compliance with technical standards in vessel build and design would also bring vessel regulation into conformance with other Australian passenger transport industry safety regimes. The “Australian Design Rules”, the national motor vehicle safety regulations, were first published in 1969 and have been nationally mandated under the Motor Vehicle Standards Act 1989 (Commonwealth) since 1989.<sup>5</sup>

Due to the perceived imposition on industry, the ARBSC are not currently proposing that a reviewed ABP Standard seek to mandate full compliance with specified standards. The ARBSC determined that a reduced moderation of specified standards would address the primary identified safety concerns. This is principally because the volume and buoyancy values determined from specified standards are considered as core safety measures of the specified standards (and these requirements are contained within the ABP Standard).

The primary identified safety concerns arising from the lack of conformity with specified standards are:

- i) Maximum loading masses which exceed those calculated from specified standards
- ii) Maximum person masses which exceed those calculated from specified standards
- iii) Maximum outboard masses which do not account for the weight of related equipment (batteries, portable fuel tanks, etc)
- iv) Fitting of basic instead of level flotation when ABYC or ISO standards are nominated
- v) “Carry-on” load which does not account for the actual mass of equipment carried

---

<sup>4</sup> National Marine Safety Committee, *Regulatory Impact Statement- National Standard for Recreational Vessels*, 2003 accessible at: [http://www.anzsbeg.com.au/files/4413/2096/0347/RIS\\_Final\\_ABP\\_\\_1\\_May\\_2003.pdf](http://www.anzsbeg.com.au/files/4413/2096/0347/RIS_Final_ABP__1_May_2003.pdf)

<sup>5</sup> Further information regarding the Australian Design Rules scheme may be accessed at: <https://infrastructure.gov.au/vehicles/design/>

**B. Contain clauses written in clear English, without ambiguity between ABP definition clauses and specified standard definitions.**

The ABPWG identified that much of the structure of the ABP Standard is non-coherent, several clauses are ambiguously worded and in general, it is a difficult document to understand.

For example, some ABP Standard clauses are written in a manner which make it difficult to understand what is required. This was evidenced by examined vessel ABPs, which demonstrated significant variation in their interpretation of ABP Standard requirements, such as the method for determining outboard mass.

There are also inherent ambiguities where the ABP Standard requires that masses are “calculated in accordance” with a specified technical standard; yet values actually listed on the ABP are required to be “as recommended by the builder”.

Re-writing or removing ambiguities will improve the legibility of the ABP Standard and reduce the variation in interpretations (variances which may lead to the listing of inaccurate and potentially unsafe ABP values).

A key aim of the review is to improve the legibility of the document, so it may be easily understood by boat builders, regulators and other stakeholders.

**C. Ensure loading values listed on ABPs do not exceed those calculated from a specified standard.**

The ABPWG identified that the loading values listed on ABPs frequently differ from those calculated in accordance with specified technical standards. Of concern, a significant proportion of the small volume recreational vessel fleet were observed to list loading values which exceeded values calculated in accordance with specified standards. This promotes the likelihood of vessel overloading, which in turn increases the chance of vessel capsize or swamping (with associated negative safety outcomes).

It is assumed that a clear majority of prospective vessel buyers will look to the ABP (or ABP derived information) to assess the passenger carrying capacity of a vessel as an influencing factor in their boat purchase.

As referenced in the introduction to this paper, the ABPWG noted a significant incident in which a small vessel’s ABP displayed values which exceeded those calculated from the specified standard.

This vessel was carrying a passenger and maximum load which were less than the passenger and maximum load listed on the ABP, but more than the loads derived from the specified standard calculations. The vessel capsized, resulting in the deaths of all three persons on board. While it is not known if the incident vessels ABP values influenced the boater’s decision making, it does constitute a failure of ABP Standard Objective (b) (providing for-) *“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.”*

The intention of the ABP Standard is that person capacity and maximum load information on the ABP are calculated from the specified standards, as per the current ABP Standard clause 9.3-

### **9.3 Person Capacity and Maximum Load Information**

*“The person capacity and maximum load information specified in Clauses 8.1 e), 8.1 f), 8.2 e), and 8.2 f) shall be determined in accordance with one of the following:*

- a) *ABYC Standards and Technical Information Reports for Small Craft.*
- b) *AS 1799.*
- c) *ISO 6185.*
- d) *ISO 13590 or SAE J 1973.*
- e) *ISO 14946.”*<sup>6</sup>

The ABPWG formed the opinion that the application of clause 9.3 may be undermined through the terminology in clauses 8.1 e), 8.1 f), 8.2 e), and 8.2 f) (edition 4) *“as recommended by the boat’s builder.”* This terminology introduces ambiguity, where a boat’s builder might incorrectly recommend values which are not consistent with those determined in accordance with clause 9.3.

#### **D. Provide comment that encourages level flotation for vessels measuring less than 6 metres in length**

The ARBSC endorse that level flotation provides better safety outcomes for boaters when compared to basic or no flotation. Level flotation reduces the likelihood of vessel capsize and sinking, as well as providing a better chance of vessel recovery in swamping and capsize incidents. Additionally, it provides a safer refuge for boaters in the case of a marine incident.

The ABPWG reviewed marine incident data and identified a strong case supporting the need for level flotation. In one state, 267 marine incidents between 2007 and 2018 had descriptions indicating powered recreational vessels (under 6 metres in length) sinking, swamping or capsizing. These incidents resulted in 12 fatalities and 12 seriously injured persons (serious injuries including hypothermia).<sup>7</sup> Multiple fatal incidents were identified where boaters were unable to cling to the hulls of upturned vessels which were floating at attitudes indicative of basic flotation. It is noted that a number of these incidents occurred in relatively calm seas.

The ABPWG contend that the risks and harms of these incidents could have been significantly mitigated if the vessels were fitted with level flotation.

It is noted that the ABP Standard does not mandate level flotation. Furthermore, it provides no comment or guidance on the improved safety outcomes of level flotation (when compared to basic flotation) in recreational vessels. This is despite AS1799 strongly recommending level flotation, while ISO and ABYC standards mandate level flotation for (the majority of) small powered vessels.

In line with the findings of the ABPWG, the ARBSC recommends that the ABP Standard should encourage boat builders to fit level flotation for its desirable safety outcomes. The promotion of level flotation as a preferred buoyancy state is considered to better align the ABP Standard outcomes with Objective c) – *“information on the buoyancy characteristics of the boat so that persons may make informed decisions regarding its purchase and use.”*

The ARBSC determined that where a specified standard does not require a boat be fitted with level flotation, it is outside the scope of this review to require it. However, in line with the objective for *reduced moderation of specified standards*, the proposed ABP Standard requires flotation to be fitted as required by the specified standard chosen.

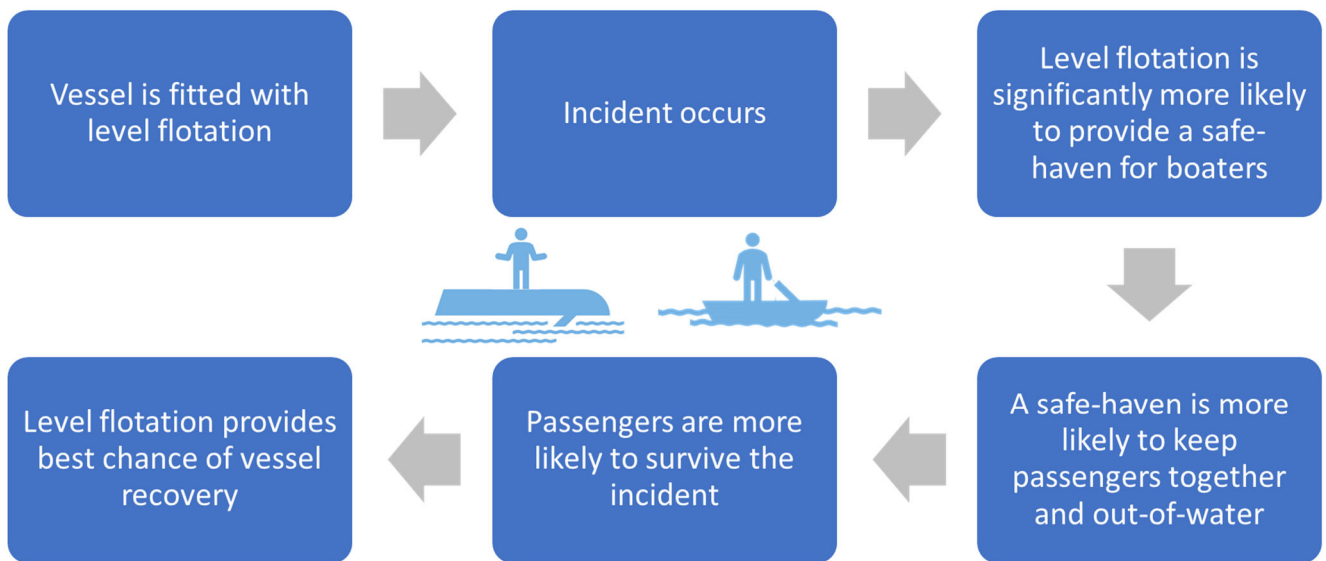
---

<sup>6</sup> Page 15. “Introduction”, Australian Transport Council, *National Standard for The Australian Builders Plate for Recreational Boats*, Ed. 4, 2011

<sup>7</sup> It should be noted that these figures are a conservative interpretation of incident data. Incomplete incident records and vessels which capsized in bar crossings have been excluded.



Image: Depiction of preferable safety outcomes of level flotation.



## E. Update administrative references

Since the last review of the ABP Standard in 2011, several organisational changes have occurred which have not been reflected in the ABP Standard. The ABPWG identified that updating these references is important to both ensure industry and consumers recognise that the ABP Standard is current and enforced, and to maintain oversight through clearly identified ownership of the ABP Standard.

# 6. General Comments on the Proposed ABP Standard

## A. Restructuring the ABP Standard

The proposed new edition of the ABP Standard contains minor changes to the content (and subsequent requirements) of the current Standard, however it proposes significant changes to the order and structure of the document.

It is believed that much of the ambiguity of the ABP Standard arises from the complex structure of the current document. By proposing a major rethink of the structure, it is hoped that all users of the ABP Standard will benefit from a less bureaucratic, more practical document.

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 (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” and 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.

## **B. Changes to the content of the ABP Standard**

Key proposed changes to the requirements of the ABP Standard are outlined in the chapter 8 of this paper.

## **C. Responsibility for determining ABP values**

Audits of boat dealers often reveal varied levels of knowledge regarding their ABP responsibilities, especially in respect to the modification of vessels prior to their initial supply to a customer. This issue limits the effectiveness of the ABP as a tool for the communication of safe loading information, as ABP values are frequently invalidated by modifications to a boat prior to a boats maiden voyage.

The upsell of fitted aftermarket accessories (sounders, trolling motors, etc) with new boats is an ingrained industry practice, which forms an important revenue stream for boat dealers and gives consumers the opportunity to customise their new boats. However, it has been noted that many ABPs provide small “carry-on” load allocations, that effectively prohibit boat dealers from fitting any accessories without invalidating the ABP values.

State legislation currently requires that boat dealers ensure the new recreational boats they sell comply with ABP requirements. Clause 3.2.2 in the proposed Standard aims to clarify this requirement. This clause is not a “new” requirement for boat dealers. It has been added to the Standard to provide clearer guidance to boat dealers and suppliers in respect to their responsibilities.

It is noted that further changes may be required in this space to avoid overloading, such as ensuring consumers are aware when a vessels carry-on load has been reduced due to dealer added fittings.

## 7. Comparison of the Tables of Contents – ABP Edition 4 and Draft Edition 5

The table below compares the content between the existing Standard (Ed. 4), with the proposed Standard (draft Ed. 5). Where a clause has been shaded a colour in column one, that requirement can be found in the “Part” in column two with the corresponding colour.

COLUMN ONE: ABP (EDITION 4)		COLUMN TWO: ABP (DRAFT EDITION 5)	
<b>1 Preamble</b>	5	<b>Foreword</b>	5
1.1 Introduction	5	<b>Part 1 Preliminary</b>	7
1.2 Publication history and amendments	5	1.1 Objective	7
1.3 Background	5	1.2 Scope	7
<b>2 Objective</b>	6	1.3 Application	7
<b>3 Scope And Application</b>	6	1.4 Referenced documents	8
3.1 Scope	6	1.5 Terms and definitions	9
3.2 Application	6	1.6 Abbreviations	12
<b>4 Referenced Documents</b>	7	<b>Part 2 General Requirements</b>	13
<b>5 Terms And Definitions</b>	8	2.1 Scope	13
<b>6 Abbreviations</b>	11	2.2 Location	13
<b>7 General Requirements</b>	11	2.3 Fixing and marking	13
7.1 Location	11	2.4 Items of information to be displayed	14
7.2 Fixing and marking	11	2.5 Symbols	15
7.3 Symbols	11	2.6 Size of text and symbols	15
7.4 Size of text and symbols	12	2.7 Design of the ABP	16
7.5 Design of ABP	12	2.8 Provision of additional safety information	16
<b>8 Displayed Information</b>	12	2.9 Sample plates	16
8.1 Boats less than 6 metres in length	12	<b>Part 3 Specified Standards and the determination of information on a plate</b>	17
8.2 Boats 6 metres or more in length	13	3.1 Scope	17
8.3 Inflatable boats	14	3.2 Determination of information	17
8.4 Personal watercraft	15	3.3 Use of specified standards	18
<b>9 Standards For Determining Information</b>	15	3.4 Values displayed	19
9.1 Use of standards	15	3.5 Conversion to metric values	19
9.2 Engine power rating and Mass information	15	<b>Part 4 Information to be displayed on the plate</b>	21
9.3 Person capacity and maximum load information	15	4.1 Scope	21
9.4 Optional warning statement – person and load capacity	16	4.2 Information required to be displayed on an ABP	21
9.5 Buoyancy information	16	4.3 Inflatable boats	21
9.6 Build date information	17	4.4 Personal watercraft	21
9.7 HIN information	17	<b>Annex A - Templates for Australian Builders Plates</b>	29
9.8 Mandatory warning statement – alteration of the boat	17	A.1 Scope	29
<b>ANNEX A - Templates for Australian Builders Plates</b>	18	A.2 ABP templates for boats less than 6 metres in length	29
A1 Scope	18	A.3 ABP templates for boats 6 metres or more in length	33
A2 ABP templates for vessels less than 6 metres in length	18	A.4 ABP templates for boats with flybridges	36
A3 ABP templates for vessels 6 metres or more in length	22		

## 8. Commentary on Proposed Changes

The following table summarises and comments on the changes to requirements proposed for edition 5 of the ABP Standard.

<b>COLUMN 1:</b> <b>PROPOSED NEW REQUIREMENT</b>	<b>COLUMN 2:</b> <b>RELEVANT NEW CLAUSE</b>	<b>COLUMN 3:</b> <b>SUPPORTING JUSTIFICATIONS FOR NEW REQUIREMENT</b>
<p><b>Elaborate on ABP location guidance.</b></p> <p>Clause 2.2 of the proposed Standard aims to clarify ABP location requirements without specifically mandating set ABP locations for different types of vessels.</p>	<p><b>2.2 Location</b></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> <ul style="list-style-type: none"> <li>a) in the cockpit; or</li> <li>b) near the primary steering position.</li> </ul> <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 satisfy this requirement. Where more than one ABP is affixed then the information contained on each of the plates shall be identical.</p>	<p><b>Poorly located ABPs not seen by operators.</b></p> <p>Clause 7.1 of the current Standard states “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.”</p> <p>It has been identified that ABPs are frequently placed in locations contrary to this guidance.</p>

<p><b>Responsibility for determining and fixing ABP.</b></p> <p>Clause 3.2.2 of the proposed Standard aims to clarify the responsibility for determining and fixing ABPs.</p>	<p><b>3.2.2 Responsibility for determining the information to be displayed</b></p> <p>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 accordance with this standard.</p> <p>.....</p> <p>.....</p>	<p><b>Prevent vessel overloading</b></p> <p><b>ABP values invalidated before first sale to customer.</b></p> <p>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>
<p><b>Addition of the term and concept of “Full accordance”.</b></p> <p>This concept is used to communicate the requirements for a boat builder when calculating ABP values.</p> <p>The concept is intended to reduce ambiguity and clarify what a boat builder must undertake to comply with the ABP Standard.</p>	<p><b>3.3.3 Full accordance with the specified standard/s</b></p> <p><i>When determining the information to be displayed on a boat’s ABP, the person responsible for determining the information shall ensure that:</i></p> <p><i>a) all calculations and tests required by the specified standard for the particular item on the plate are undertaken in full accordance with the requirements of that standard; and</i></p> <p><i>b) all considerations within the specified standard relevant to the information required to be displayed on the ABP are met.</i></p>	<p><b>Prevent vessel overloading</b></p> <p><b>Ensure all relevant aspects of a specified standard are complied with in respect to loading calculations</b></p> <p>By ensuring listed ABP loading values are calculated in full accordance with specified technical standards (including mass, person area constraints, stability, down flooding calculations, etc.) instances of overloading (within listed ABP values) should be reduced.</p>

<p><b>Removal of Level Flotation moderation.</b></p> <p><b>(Removal of current ABP Standard Clause 9.5 “Buoyancy Information” – Note 2.)</b></p> <p>While the current ABP Standard allows boat builders to nominate and calculate values in accordance with ABYC and ISO specified standards, it moderates these values by allowing boat builders to fit basic flotation to boats where the standard specifies level flotation should be fit.</p> <p>This change does not remove the ability of a boat builder to nominate a basic flotation buoyancy performance, but it does require that buoyancy performance must conform with the buoyancy required by the specified standard.</p>	<p><b>3.3.3 Full accordance with the specified standard/s</b></p> <p><i>EXAMPLE 4</i></p> <p><i>Full accordance 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.</i></p> <p><b>Table 5— Requirements for the information to be displayed on an ABP</b></p> <p><b>Row 7. Buoyancy Statement</b></p> <p><i>In determining the flotation performance of the boat, the specified standard chosen for determining all other information on the ABP shall be used.</i></p> <p><i>Where the specified standard requires that level flotation be fitted to the boat, the boat shall:</i></p> <ul style="list-style-type: none"> <li><i>a) have level flotation fitted;</i></li> <li><i>b) list the term “level flotation” on the plate; and</i></li> <li><i>c) meet all the requirements of that standard to achieve level flotation.</i></li> </ul>	<p><b>Level flotation provides for better safety outcomes than basic flotation.</b></p> <p><b>Specified standard values are intended to be accompanied by the buoyancy performance specified (in said standard).</b></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><b>The ABP Standard is not a technical standard, and it should not seek to specify technical requirements that contradict specified standards.</b></p>
---	---	--

<p><b>Clearly state where a boat builder may list non-specified standard values.</b></p> <p>Proposed clause 3.4 specifies that a boat builder may nominate ABP values more conservative than those calculated via a specified standard in respect to (a) outboard engine power, (b) person capacity and (c) maximum load.</p>	<p><b>3.4 Values displayed</b></p> <p>All values displayed on the plate shall equal the values determined in accordance with the specified standard.</p> <p>The exception to this is for the following items, where a lesser value than determined in accordance with the specified standard may be displayed:</p> <ul style="list-style-type: none"> <li>a) Outboard engine power rating</li> <li>b) Person capacity</li> <li>c) Maximum load</li> </ul>	<p><b>Prevent vessel overloading.</b></p> <p><b>Provide certainty and guidance to boat builders regarding where they may vary values.</b></p>
<p><b>Move auxiliary engine mass from “outboard engine mass” to “maximum load”.</b></p> <p>The ABP Standard currently requires that when a boat may be fitted with an auxiliary engine, an allowance for the auxiliary engine mass is provided for in the maximum engine mass value.</p> <p>This is inconsistent with the requirement that maximum outboard engine mass should be determined from a specified standard.</p> <p>As such, it is proposed that (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.</p>	<p><b>Table 5— Requirements for the information to be displayed on an ABP</b></p> <p><b>Row 6. Maximum Load</b></p> <p>The maximum load capacity displayed shall be the 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>.....</p> <ul style="list-style-type: none"> <li>d) The mass of any auxiliary outboard engine that may be carried.</li> </ul> <p>.....</p>	<p><b>Reduce moderation of the specified standards and improve the logic of the ABP.</b></p>

<p><b>Change from optional to mandatory warning statements.</b></p> <p>The current ABP Standard contains an optional warning statement regarding the decreasing of loading masses in certain conditions (“reduction of load”).</p> <p>For boats with a flybridge, it also includes an optional warning statement regarding safe passenger numbers to be carried on the flybridge.</p> <p>It’s proposed that these statements are made mandatory where applicable; and that the “reduction of load” warning statement references the intended operational limitations of the boat consistent with the specified standard used.</p> <p>When ABYC is the nominated standard, it requires that the intended operational limitations are consistent with AS1799. This is because ABYC does not itself contain operational limitations, but the methodology and design parameters of ABYC standards are comparable to AS1799.</p>	<p><b>Table 5— Requirements for the information to be displayed on an ABP</b></p> <p><b>Row 9. Warning statement 2 – Operating capacity</b></p> <p><i>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).</i></p> <p><i>Where AS1799 or ISO standards are the specified standards, the operating capacity warning statement/s shall be consistent with the provisions of the specified standard used:</i></p> <p><i>a) Where AS1799 is the specified standard, this warning statement shall state that the values listed are valid for operations within protected waters only, as defined in AS1799.1.3.32 and state that protected waters are “Lakes, rivers, bays, estuaries and similar bodies of water.”</i></p> <p><i>b) Where ISO standards are the specified standard, this warning statement shall state the boat design category within which the values have been calculated and the limiting wind forces and significant wave height for that category.</i></p> <p><i>Where ABYC standards are the specified standard, this warning statement shall be consistent with the operational capacity contained within AS1799.</i></p> <p><i>The operating capacity warning statement/s may refer to the boat’s operating manual.</i></p>	<p><b>Prevent vessel overloading</b></p> <p><b>Ensure compliance with ABP Standard Objective (b)</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>The specified standards state intended operational limitations (eg. ISO category model and AS protected waters limitations) which are fundamental to understanding that the calculated loading values listed on ABPs are designed within condition tolerances.</p> <p>It seems logical that these standard limitations should be required to be listed along with any statements the specified standard makes to operating the vessel beyond these limitations.</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><b>Table 5— Requirements for the information to be displayed on an ABP</b></p> <p><b>Row 10. Warning Statement 3 – Flybridge capacity</b></p> <p><i>For boats with a flybridge, a warning statement providing the maximum number of persons to be carried on the flybridge shall be displayed on the ABP.</i></p> <p><i>Where a boat is fitted with a flybridge then an additional plate shall be affixed to the flybridge in a prominent position adjacent to the flybridge steering position.</i></p>	
<p><b>Where a HIN is already affixed to a boat, ensure that HIN is also displayed on the ABP.</b></p> <p>The current Standard permits the choice between listing a HIN or build date on an ABP, regardless of whether a boat already has a HIN number affixed.</p>	<p><b>Table 5— Requirements for the information to be displayed on an ABP</b></p> <p><b>Row 11. HIN Number</b></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><b>Provide best available information on ABP.</b></p> <p><b>Decrease possibility of mixing/swapping ABPs between vessels.</b></p>
<p><b>Removal of standard: ISO 11192—Small craft – Graphical symbols</b></p> <p>The current Standard states “Any symbol used shall be as specified in ISO 11192, or as illustrated in this standard.”</p>	<p><b>N/A – removed from Standard.</b></p>	<p><b>As the Standard contains all allowable ABP symbols, the inclusion of ISO11192 is unnecessary and a potential cost burden.</b></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>

