



Marine order 16 (Load lines) 2025 and Marine order 19 (Tonnage measurements) 2025

Consultation feedback report

Introduction

This report provides an overview of the consultation process, key issues raised during public consultation and the key changes to Marine Order 16 (Load lines) 2025 (MO16) and Marine Order 19 (Tonnage measurement) 2025 (MO19), issued under the Navigation Act 2012.

MO16 gives effect to the International Convention on Load Lines (Load Lines Convention) which is applicable to vessels of 24m length and above including commercial recreational vessels on international voyages. It is not currently clear in the marine order that when an Australian recreational vessel is operating as a commercial yacht and becomes a regulated Australian vessel (RAV), it is subject to the Load Lines Convention, and MO16 applies to it.

MO16 was last issued in 2014 and a full review of the marine order was undertaken for any necessary updating and to reissue it in the current drafting style for improved usability.

MO19 gives effect to the International Convention on Tonnage Measurement of Ships (Tonnage Convention) which is applicable to all vessels of 24m in tonnage length and above on international voyages. It is identified that the current MO19 does not capture all Australian vessels to which the Tonnage Convention applies. Consequently, the issuing body (AMSA and/or recognised organisations) is not provided with the necessary power to issue International Tonnage Certificates to Australian recreational vessels that are proceeding on an international voyage. MO19 therefore needs to be amended to provide the necessary power.

Additionally, from time to time a domestic commercial vessel (DCV) may need to undertake an overseas voyage for dry-docking, and when they do so they transit as a RAV. Providing an option for a DCV owner to apply for an International Tonnage Certificate if they want to, would simplify the process for the owner and AMSA.

A summary of the main changes in MO16 are:

- clarifying that when an Australian recreational vessel operating as a commercial yacht becomes a RAV, it is subject to the Load Lines Convention, and MO16 applies to it; and
- making the marine order consistent with the current drafting style, and easy to understand.



A summary of the main changes in MO19 are:

- providing the necessary power to AMSA or a recognised organisation (RO) to issue International Tonnage Certificates to applicable Australian flagged vessels;
- providing an option for a DCV owner to apply for an International Tonnage Certificate if they want to; and
- making the marine order up to date, consistent with the current drafting style, and easy to understand.

Consultation approach

The commercial vessel industry has diverse interests, business models and widespread geographic distribution. These elements need to be considered when developing new and amended regulations and standards. Therefore, consultation plays a critical role in the development of robust and fit for purpose regulation.

Consultation also plays an important role to ensure safety standards and regulations adequately and appropriately address risks associated with commercial vessel operations and the impact of changes on other sectors.

To facilitate industry input AMSA established a public consultation process, requesting the public to comment on the revised draft orders through a period of six weeks. During this period diverse stakeholders were contacted by email and invited to comment.

Public consultation

The public consultation on the proposed draft MO16 and MO19 took place from 18 February 2025 to 31 March 2025 for a period of six weeks. Copies of draft MO16 and MO19 were placed on the AMSA homepage as a news article and on the AMSA website for public comments. Notification of the public consultation was also emailed to around 130 stakeholders including shipowners, ship operating companies, training organisations, port authorities, seafarer representative organisations, relevant unions, classification societies, shipping industry peak bodies and interested government departments and agencies inviting them to comment.

No submission was received during the public consultation period and the drafts were finalised with some minor editorial changes on further internal review.

Further information

AMSA has provided reference materials to support the implementation of the reissued MO16 and MO19. Please visit AMSA's website:

- [Marine order 16 – Load lines](#)
- [Marine order 19 – Tonnage measurements](#)

If you require further information, please [contact AMSA Connect](#).