

tion operated exclusively for "testing for public safety" as described in Section 501(c)(3) of the IRS code. The purpose of the imposed procedural guidelines is to make certain the Bureau's product evaluation services are in the public interest and fair to all.

The IRS ruling was in part premised on the condition no part of Bureau operation was devoted to carrying on propaganda. Specifically related to that restraint is the avoidance of any attempt to influence legislation. To live completely with the spirit and word of that restraint the Bureau has not and does not express opinions on what product safety matters should or should not be regulated. However, I want to equally stress that, for such product safety matters as are now, or may be, the subject of regulations, the Bureau's evaluation operations can, and it is hoped they will, aid authorities charged with their administration.

The essence of Bureau operation is provision of an independent, uniform, reliable, and impartial marine product safety evaluation and certification service for the boating field. This is ensured by careful adherence to the procedural guidelines, plus keying evaluations to illustrate compliance with:

1. The advisory safety standards established by organizations like the American Boat & Yacht Council (ABYC) and the National Fire Protection Association (NFPA) in which all interested parties may participate; or
2. Applicable government regulations.

It is worth stating that the organizational separation of advisory safety standard development and safety evaluation voids any aspect of "self-certification".

The foregoing fixes the Bureau position with respect to regulations that may be established to control pollution from pleasure boats. The Bureau can, as a "testing for public safety" organization, develop and accomplish testing procedures that illustrate capability of devices or systems to comply with established objectives. This is the area of considerable past and current Bureau activity.

The ABYC was formally organized in 1954 for the single purpose of developing advisory safety standards for physical features of boats and their equipment through procedures permitting all interests concerned to participate. I was active in its formation and privileged to serve as its administrator until 1962.

In 1967, under the impulse of several annual conferences jointly sponsored by the New England Interstate Water Pollution Control Commission and the National Association of Engine & Boat Manufacturers, the ABYC was asked to develop "recommended practices and standards for sewage treatment devices for marine toilet waste, including their installation". That request was accepted. A committee blending industry, governmental, and professional participation was formed. The committee developed a proposal in time for the January 1959 joint conference. The proposal was commended by that conference and later in the same year adopted by the ABYC as an advisory standard. It was amended, in 1961, to include a recommended space allowance for installation of the devices aboard boats. A copy of that standard is attached, and a perusal will reveal:

1. It refers only to devices designed to treat human waste by the maceration-disinfection method to permit overboard discharge.
2. It states effluent and safety requirements in terms of objectives to be attained.

At the time the development of this standard was undertaken, only one device of the type was available to the best of my knowledge. The manufacturer had been working with the biology department of Wesleyan University and the Water Pollution Commission of the State of New Hampshire. Sanitary engineers of that commission undertook effluent testing of devices to help implement a state regulation prohibiting toilets aboard boats unless equipped with an *approved* sewage treatment device. The effective date of that regulation was originally set for the boating season of 1959, and I believe was a first.

During this period, various states were considering regulations to control pollution from boats. The ABYC standard provided guidance for them as well as for several manufacturers interested in developing devices of the type.

I should mention that while retention tanks were considered at the time as a method of pollution control, it was not pursued for standard development, because of space requirements aboard and the absence of shore side services. I should also mention that the effluent requirements for the macerator-disinfectant class of device, as stated in the original ABYC standard have not been changed. Those