



AMSA webinar - Q & A

New safety management system requirements

On 19 March 2025, the Australian Maritime Safety Authority (AMSA) hosted a webinar for domestic commercial vessel (DCV) owner/operators and maritime professionals, on new safety management system (SMS) requirements.

The webinar included the following topics:

- Drug and alcohol policy
- Master and designated person responsibility statement
- Key operational procedures
- Vessel emergency plans
- Assembly station requirements
- Vessel stability and record of vessel modifications

This document is a summary of key questions and answers from the webinar.

Drug and alcohol

How can I find out about the possible side effects of medication that my crew are taking?

If a crew member is prescribed a new medicine, their pharmacist should provide them with a [Consumer Medicine Information \(CMI\) leaflet](#). For further information, visit the [Healthdirect Australia website](#) or consult your local health care professional.

Does AMSA expect a certain number of drug and alcohol tests to be conducted and recorded each year?

You won't be required to conduct and record a minimum number of tests.



Vessel owners and operators have the flexibility to assess the specific risks to their operation. Owners will be able to decide what controls need to be implemented to ensure a vessel is not being operated while a master or crew member is impaired. These controls may or may not include testing.

I believe a dry boat should be a basic safety precaution for all vessels. Why didn't AMSA prohibit alcohol for all crew on board commercial vessels?

Vessel owners, in consultation with the master and crew, are best placed to develop a risk-based drug and alcohol policy. This includes determining what is acceptable and unacceptable drug use. This might include having a 'dry vessel' policy where no alcohol is permitted. Alternatively, crew may be permitted to have a limited supply of alcohol at the end of their day. Where alcohol is allowed, vessel owners should consider how this will be managed and any impacts it may have on the crew's ability to undertake duties in an emergency.

If a crew member is on board and takes a drug which affects their judgement, what measures can the master take to confine the crew member?

Your drug and alcohol policy should consider how to prevent this occurring. This could include:

- limiting alcohol consumption
- running a dry boat
- having a strict no drugs policy
- other controls.

However, if someone is under the influence of alcohol, non-prescribed medication or possible side-effects of prescribed medication, it is important to consider if they are a danger to themselves or others.

Try to prevent the situation from escalating. Talk to the affected person calmly and keep them in a safe space. If the person's actions endanger the safety of the vessel or people on the vessel, you can take reasonable steps to ensure the safety of the vessel.

If the master asks me what prescription drugs I'm taking, do I have the right to privacy?

You may be required to give information to a vessel's master or your employer about your use of prescription drugs. This will help them understand whether you are capable of performing relevant duties and enable them to assess safety risks.

This information may also be required to ensure compliance with workplace health and safety (WHS) laws.

You can ask why information regarding prescription drug use is necessary at the time it is requested.



Can our corporate alcohol and drug policy be referenced in the SMS? Should we add high level dot points from the policy in the SMS?

If you already have a drug and alcohol policy in place to meet your WHS obligations, you should check that:

- a copy is included in the vessel's SMS
- you have inducted all your existing crew/staff on the policy
- you are inducting all new crew/staff when they join the vessel/operation, and
- you regularly train your crew/staff on the policy and how it works in practice.

Is the addition of a drug and alcohol policy a new requirement for a vessel's SMS?

As of 1 June 2025, there will be an explicit requirement in Marine Order 504 (MO504) for a drug and alcohol policy to be included in the vessel's SMS. This policy must address how the risks of drug and alcohol use are managed.

While this is a new requirement, many DCV owners and operators may already have a drug and alcohol policy in place to meet their WHS obligations.

Is this drug and alcohol policy for big ships like bulk carriers or only Class 1, 2 and 3 vessels?

The new drug and alcohol policy requirement in MO504 applies to all DCVs (Class 1, 2, 3 and 4).

AMSA has released guidance on how to develop a drug and alcohol policy for Class 1, 2 and 3 vessels. This guidance includes different scenarios and examples. Read the guidance:

<https://www.amsa.gov.au/changes-marine-order-504/update-your-sms/drug-and-alcohol-policy-class-1-2-and-3>

AMSA has also released guidance on how to develop a drug and alcohol policy specifically for Class 4 vessel operations. This guidance includes different scenarios and examples. Read the guidance:

<https://www.amsa.gov.au/changes-marine-order-504/update-your-sms/drug-and-alcohol-policy-class-4>

Master and designated person

Don't masters already have authority to make decisions to keep their vessel safe?

Yes. This amendment was included to clarify the existing requirements. If your existing master's responsibility and authority statement doesn't include reference to their authority to make decisions for the safety of the vessel, the environment and persons on or near the vessel, or that they may require the owner's assistance to ensure the same, it will need to be updated before 1 June 2025.



Can the designated person and emergency contact be the same person?

Yes, they can, however it is important to distinguish between the two functions. See: <https://www.amsa.gov.au/vessels-operators/domestic-commercial-vessels/operational-safety/designated-persons>

Can the master be a designated person?

There is no set rule about who can hold the function of designated person as long as the function can be effectively managed. This will depend on the size of organisation and the type of operation.

Our designated person responsibility statement doesn't look anything like the example shown. Do we need to change it?

The example shown is a guide to help industry develop their own statement.

If you already have a designated person responsibility statement and it covers the roles and responsibilities that apply to your operation, then you don't need to change it.

We recommend that you review it to ensure it remains current and includes details of the designated person(s) and their contact information.

Our designated/owner/master is the same person. During the training session, do they need to sign the form to ensure everyone went through the training?

The training records that are required under M0504 only need to include:

- a description of any training, induction or familiarisation undertaken
- a description of any emergency drills conducted
- the name and signature of any person participating
- the date the training occurred.

The training records do not need to be individually signed off by the owner, master or the designated person.

What if you're not eligible for a simplified SMS and the owner, operator and designated person is all the same?

If you are not eligible for a simplified SMS, and the owner is also the designated person and master, you will need to include these statements in the vessel's SMS:

- owner's responsibility and authority statement
- designated person responsibility statement
- master's responsibility and authority statement.

These statements can be combined into one statement if the requirements for each statement are met.



Operational and emergency procedures

What if one of the procedures listed in M0504 is not applicable to my vessel or operation?

If a procedure for vessel operations listed in M0504 is not applicable to your vessel or operation, you do not need to include the procedure in your vessel's SMS. For example, if your vessel does not have a confined space, you will not need to include a procedure for confined space entry.

However, in some circumstances, you will find that additional procedures to those listed in M0504 are required to address risks identified by the vessel's risk assessment.

Assembly station

I have members who are not eligible for a simplified SMS because they have a net reel or petrol inboard engine. They then need to adhere to the passage planning stipulation for a 6m open vessel with no cabin/wheelhouse. This works well if on larger vessels, but isn't practicable for smaller vessels.

When the simplified SMS approach comes into effect on 1 June 2025, we'll monitor whether the eligibility criteria is fit for purpose, and balances safety and burden on industry.

There will be a webinar focused on the new simplified SMS arrangements on 9 April 2025. Find out more about the webinar and register: <https://www.amsa.gov.au/news-community/webinars/upcoming-webinars>

Do vessels operating under a simplified SMS need to include an assembly station?

Vessels that meet the eligibility criteria for a simplified SMS will not be required to include an assembly station in the vessel's emergency plan.

However, owners are encouraged to include one where it is practical based on the vessel's layout, size, characteristics and risk assessment.

If our vessel does not qualify for a simplified SMS but it is a small vessel (5.5m), do we have to have an assembly station?

If your vessel is not eligible for a simplified SMS, you should include an assembly station based on the vessel's layout, size, characteristics and risk assessment.



What vessel classes are assembly station requirements applicable to?

There are 2 parts to this requirement in MO504.

Part 1: Include a primary assembly station in the emergency plan (existing requirement)

Owners of Class 1, 2 and 3 DCVs (except vessels eligible for a simplified SMS) must include a primary assembly station in their emergency plan.

Vessels eligible for simplified SMS will not be required to include an assembly station in the vessel's emergency plan. However, owners are encouraged to include one where it is practical based on the vessel's layout, characteristics and risk assessment.

Note: Owners of Class 4 vessels must include at least one assembly station in their emergency plan if it is practicable.

Part 2: Include an alternative assembly station in the emergency plan (change to existing requirement)

From 1 June 2025, owners of Class 1, 2 and 3 vessels (except those eligible for a simplified SMS) are required to identify an alternative assembly station for a vessel if it is practical based on the vessel's layout, characteristics, and risk assessment.

Previously, the requirement for an alternative assembly station was dependent on the number of persons carried on board.

Vessel stability

If the commercial vessel is in survey, and a stability test and assessment has been completed, why would the master assess the vessel's stability risk other than through normal operations such as net hook-up or large fish catch?

The master needs to be aware of operational factors that may affect the vessel's stability, such as the examples you mentioned. The master should also be aware of any operational limitations in the vessel stability book.

The master should understand what conditions will affect the vessel's stability, including permanent modifications, that may require the stability to be reassessed by an accredited marine surveyor.

Simplified SMS

How do you find out if you're eligible for a simplified SMS?

See the eligibility criteria for simplified SMS: [Step 2: Check eligibility for a simplified SMS | Australian Maritime Safety Authority](#)



AMSA will also be hosting a webinar on the simplified SMS changes on 9 April 2025. To register for the webinar, please visit: [Upcoming webinars | Australian Maritime Safety Authority](#).

Resources

Can the examples be used/copied into an SMS if the example exactly fits my vessel?

The examples are for guidance only and are there to assist you with developing your own SMS.

We recommend that you consult your master and crew when developing your SMS and consider all aspects of your operation. Although the examples that we have provided may be applicable to your operation, we suggest using them as a starting point.

Other

Have there been any studies or is there evidence to suggest there has been a decrease in deaths and serious injury in our industry since the implementation of the SMS requirements?

SMS requirements have been in place for DCVs for many years. Before M0504, from 2005 to 2018, these requirements were outlined in NSCV Part E – Operations and managed by the states and Northern Territory.

Several studies show that SMS can improve safety outcomes. The combination of a structured SMS, continuous training, assessments, and a safety culture has contributed to reducing serious incidents in the maritime industry over time.

AMSA analyses marine incident data to identify patterns and connections between incidents that take place across Australia. This analysis together with inspections deficiency data helps to inform the development, prioritisation and implementation of safety strategies, and may include changes that are made to SMS requirements, such as the lifejacket risk assessment.

Does each individual vessel need a separate SMS? Or can one SMS cover multiple vessels?

An SMS may be for more than vessel. However, the SMS should take into consideration the unique risks, characteristics and layout of each vessel.

How frequently are we required to conduct fire drills?

The owner of the vessel must ensure that emergency drills are conducted with a frequency determined by the vessel's risk assessment.

There is no minimum number of drills, however they should be frequent enough to sufficiently test procedures and confirm the competence and ability of the master and crew to respond rapidly and effectively in an emergency.



What constitutes a 'day passenger'?

The term 'day passenger' is defined in the revised MO504. 'Day passenger' means a passenger who is not provided with sleeping accommodation.