



Australian Government

Australian Maritime Safety Authority

# Simplifying safety management system (SMS) requirements for smaller, less complex vessels and operations

Consultation: MO504 Phase 2

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## Proposed changes

**Change to existing requirements:** Simplify SMS requirements for smaller, less complex DCVs.

**Applies to:** Eligible Class 2, 3 and 4 vessels.

We're proposing to provide an alternative simplified set of safety management system (SMS) requirements for smaller, less complex DCVs and operations.

AMSA has worked closely with industry representatives to ensure that the proposed simplified SMS approach will uphold or improve safety outcomes, align better with operational needs and reduce administrative burden.

The simplified SMS requirements are made up of 6 key components:

1. Administrative requirements
2. Risk assessment requirements
3. Crewing requirements
4. Policies and procedures for vessel operations
5. Emergency preparedness
6. Maintenance of vessel and equipment

## Eligible vessels

- Class 2 vessels less than 7.5m in length that carry no more than 4 day passengers
- Class 3 vessels less than 7.5m in length
- Class 4 vessels less than 7.5m in length

To be eligible, these vessels must not:

- carry dangerous goods
- have installed a net reel, crane, lifting device or deck load, the use of which is likely to adversely impact the stability or watertight integrity of the vessel
- have an inboard engine which operates on fuel that has a flashpoint of less than 60 degrees
- have berthed accommodation
- be set up for towage operations
- be determined by the National Regulator to be unsuitable for simplified SMS arrangements.

The additional Class 4 requirements set out in Schedule 2 of the MO504 consultation draft will continue to apply for Class 4 vessels that are eligible for a simplified SMS.

## What's proposed to change?

We've scaled back SMS requirements to ensure that they are fit for purpose and align with the operations of the eligible vessels.

We've removed SMS requirements that are not considered practical for small, less complex vessels, or amended them to be more appropriate.

Key changes for eligible vessels:

- If the owner is also the designated person, a designated person responsibility statement will not be required in the vessel's SMS.
- If the owner is also the master, a master's responsibility and authority statement will not be required in the vessel's SMS.
- The risk assessment will no longer need to identify the key daily tasks performed by the master and crew.
- The mandatory procedures for vessel operations will be reduced.

- Owners will no longer be required to identify an assembly station in the emergency plan.
- The mandatory details in the vessel's crew list will be reduced.

## 1. Administrative requirements

Vessels eligible for a simplified SMS will be required to include the following administrative information in the SMS:

- vessel details and contact information
- owner's responsibility and authority statement
- details about the designated person/s (may be the owner)
- a designated person responsibility statement (not required if the designated person is the owner)
- master's responsibility and authority statement (not required if the master is also the owner and not required for Class 4 vessels).

Eligible vessels must also maintain the following documentation with their SMS:

- logbook
- crew list.

**Note:** The details required in the vessel's crew list have been reduced for vessels eligible for a simplified SMS.

A passenger manifest for voyages that are at least 12 hours long will no longer be required for vessels eligible for a simplified SMS.

Eligible vessels must continue to meet the requirements for annual review of each procedure in the SMS. They must also continue to meet requirements for recording revisions to their SMS. However, these requirements have been simplified.

Class 4 vessels do not need to meet the documentation requirements in Schedule 1. However, they must continue to meet the documentation requirements set out in Schedule 2.

## 2. Risk assessment requirements

The risk assessment requirements in MO504 will continue to apply to vessels eligible for a simplified SMS. This includes the new proposed requirement for a fatigue risk management plan (Class 4 vessels are not required to have a fatigue risk management plan).

However, eligible vessels will no longer be specifically required to identify:

- the key daily tasks to be performed by the master and crew
- a person responsible for ensuring that actions needed to eliminate or minimise any risk are carried out.

In addition to the requirements in Schedule 1, Class 4 vessels must continue to meet the additional risk assessment requirements in Schedule 2.

It is also important to note that there is no one size fits all approach to a risk assessment. The length and complexity of a risk assessment should be tailored to the operations of each vessel.

### 3. Crewing requirements

The crewing requirements outlined in MO504 will continue to apply to Class 1, Class 2 and Class 3 DCVs, including those that are eligible for a simplified SMS.

### 4. Procedures for vessel operations

Vessels eligible for a simplified SMS will no longer need to comply with the full list of mandatory procedures for vessel operations in MO504. Instead, eligible vessels will only need to include procedures for:

- pre-operating checks
- vessel access
- wearing of lifejackets, taking account of the risks identified in the vessel's risk assessment and the management of lifejackets to ensure that they are readily available
- providing a safety induction to each passenger as soon as practicable after the passenger boards the vessel. The induction should detail the relevant vessel and emergency procedures, including the wearing of lifejackets (passenger vessels only)
- passenger monitoring so that the master of the vessel knows the number of passengers on board at any time (passenger vessels only).

A drug and alcohol policy will also need to be recorded in the vessel's SMS.

In addition to the requirements in Schedule 1, Class 4 vessels must continue to meet the additional requirements regarding procedures for vessel operations outlined in Schedule 2.

### 5. Emergency preparedness

The requirements for emergency preparedness will continue to apply to vessels that are eligible for a simplified SMS. This includes the new procedures being proposed for the emergency plan.

However, these changes will be made:

- An assembly station will no longer be required.
- A vessel with passengers will no longer be required to provide emergency information in each assembly station, each passenger cabin or other areas frequented by passengers.

In addition to the requirements in Schedule 1, Class 4 vessels must continue to meet the additional emergency preparedness requirements that apply outlined in Schedule 2.

## **6. Maintenance of vessel and equipment**

The requirements for maintenance of vessel and equipment will continue to apply to vessels that are eligible for a simplified SMS. This will include the new proposed amendment to clarify that inspections may be undertaken by an authorised person or suitable person appointed by the owner.

### **Have your say**

Submit your feedback on the proposed simplified SMS requirements, and other proposed SMS changes at [amsa.gov.au/smsconsultation](https://amsa.gov.au/smsconsultation)



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