



AMSA webinar - Q & A

Simplified safety management system

On 9 April 2025, the Australian Maritime Safety Authority (AMSA) hosted a webinar for domestic commercial vessel (DCV) owner/operators and maritime professionals, on simplified safety management system (SMS).

The webinar included the following topics:

- What is a simplified SMS and why it's being introduced
- Vessel eligibility criteria
- Breakdown of each section of the simplified SMS including risk assessment, crewing, policies and procedures, emergency plans, maintenance and Class 4 operations
- Available resources to support implementation

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

Vessels and activities

Are emergency services vessels eligible for a simplified SMS?

Yes. Emergency services vessels are eligible for a simplified SMS provided they [meet the eligibility criteria](#).

I run water skiing activities on my 2D/2E vessel, am I eligible for simplified SMS? How does this also apply when I use my vessel for personal use with friends and family?

For simplified SMS, we define 'towage' as one vessel towing another. It doesn't include towing people on skis or other recreational equipment.

If your vessel is used for things like water-skiing, you may be eligible for a simplified SMS, if you [meet the remaining eligibility criteria](#).



If you are operating the vessel for personal use and meet the required conditions, you can continue to operate the vessel under [Exemption 4 – Marine safety \(Recreational use\)](#).

We are operating in a 3C classification, the boat is under grandfather clause which is an existing vessel. The vessel though has a net reel boat, are we eligible for simplified SMS?

It depends on a few factors. A vessel with a net reel can be eligible if using the net reel doesn't affect the vessel's stability or watertight integrity.

You must keep evidence of this in the SMS and [meet all the other eligibility criteria](#).

Will small trawlers be excluded if they are set up to tow?

Vessels are only excluded from a simplified SMS if they are primarily used for towage, like tugboats.

Small trawlers are not considered to be operated primarily for towage for simplified SMS purposes. Even if a vessel is set up for towage, but does not regularly perform towage operations, it can still be eligible for a simplified SMS if it [meet the remaining eligibility criteria](#).

VMR vessels operating under EX40 are required to tow vessels in certain situations. Are they eligible for simplified SMS?

A volunteer marine rescue (VMR) vessel is not eligible for a simplified SMS if it is operated primarily for towage. It would need to meet the full requirements for an SMS outlined in M0504.

If the VMR vessel only tows in certain situations and towage is not its main function, it may be eligible for a simplified SMS.

Engine and fuel

Am I eligible for a simplified SMS if I have an outboard petrol engine?

Yes, if you [meet the other eligibility criteria](#).

Vessels with an inboard engine operating on petrol, or another fuel with a flashpoint below 60°C are not eligible for a simplified SMS.

Does an inboard diesel engine exclude a vessel from a simplified SMS?

Not necessarily. Vessels with inboard engines that operate on fuel are only excluded if they have a flashpoint below 60°C.

Check the fuel's safety data sheet to confirm what the flashpoint is.



Accommodation and passengers

Is a half cabin classed as a berthed vessel if it has 2 bunks?

Yes. Any vessel with any type of berthed accommodation (including a half cabin), whether used or not, is not eligible for a simplified SMS.

These vessels must meet the full SMS requirements under Marine Order 504.

If my vessel has berthed accommodation but I never use it, can I use a simplified SMS?

No. Any vessel that has berthed accommodation, whether used or not, is not eligible for a simplified SMS. These vessels must meet the full SMS requirements under Marine Order 504.

We only carry “special personnel” under Exemption 2 for training – six special personnel and one master. Does this mean we have zero day passengers on board and are therefore eligible for the simplified SMS?

Yes.

The definition of a passenger **does not** include:

- the master or crew member
- special personnel
- children under one year old
- a person on board because of the master’s obligation to carry shipwrecked or distressed people or because of unavoidable circumstances.

A day passenger is defined as a passenger who is not provided with sleeping accommodation.

Based on your description, you would carry zero day passengers and may be eligible for a simplified SMS - if you [meet the remaining eligibility criteria](#).

Am I able to reduce my survey capacity with AMSA for personnel carriage and apply for a simplified SMS?

Yes. If your Class 2 vessel is authorised to carry more than 4 day passengers, you can apply to AMSA to reduce the maximum numbers specified on your vessel’s permission and become eligible for a simplified SMS.

[Apply to vary a vessel certificate or approval \(form 566\)](#).



Loads and stability

Do vessels that occasionally use small davits for lifting small loads, which are approved under the vessel's stability, eligible for simplified SMS?

Yes – but only if using the davit does not affect the vessel's stability or watertight integrity. You must keep evidence of this in the vessel's SMS.

The vessel will also need to meet the [remaining simplified SMS eligibility criteria](#).

Does carrying small quantities of ethanol used for scientific purposes prevent us from having a simplified SMS?

Not necessarily. Vessels that carry dangerous goods as cargo are not eligible for a simplified SMS. But cargo **does not** include:

- ballast for the vessel
- goods intended for consumption
- goods intended for use on the vessel.

If the small quantities of ethanol are for use on the vessel (not carried as cargo), the vessel may be eligible for a simplified SMS. It is important to risk assess the storage and use of chemicals and have appropriate controls in place to manage the risks.

About simplified SMS

What are the key differences between a simplified SMS and a full SMS?

The key differences for eligible vessels include:

- If the owner is also the designated person, a designated person responsibility statement is no longer required in the vessel's SMS.
- If the owner is also the master, a master's responsibility and authority statement is no longer required in the vessel's SMS.
- The risk assessment no longer needs to identify the key daily tasks performed by the master and crew.
- The mandatory procedures for vessel operations have been reduced.
- Owners are no longer required to identify an assembly station in the emergency plan.
- The mandatory details in the vessel's crew list have been reduced

Is there any flexibility for an 8.5-metre VMR vessel to be eligible for the simplified SMS?

In summary, eligibility for a simplified SMS is restricted to vessels less than 7.5 meters.



The simplified SMS arrangements have been limited to vessels less than 7.5m to more closely align with the existing eligibility criteria in Division 2 (General) of Exemption 03 – Maritime Safety (Certificates of operation) 2020.

We consider vessels that are less than 7.5m in length and that meet the simplified SMS eligibility criteria to be of lower complexity. As a result, it was determined that this vessel length cut-off would be appropriate from a risk perspective and to ensure that the simplified SMS approach delivers acceptable safety outcomes.

We worked closely with industry to develop the simplified SMS arrangements. This included several focus group sessions and a survey.

Once implemented, we will monitor the performance of the simplified SMS approach. We will examine whether the eligibility criteria is fit for purpose, and balances safety and burden on industry. This includes consideration of whether broader application may be appropriate in the future.

Do I need to create a new SMS, or can I continue to use my SMS app?

A simplified SMS can be paper-based or app-based.

You can continue using your SMS app if it meets the requirements under Marine Order 504.

It should be kept both onboard and onshore, with shore-based personnel.

If you opt for an electronic version of the SMS, you must ensure it can always be accessed by the master, crew and others that use the system. You must also ensure you can present the SMS to AMSA or a marine safety inspector when requested.

If your app doesn't work offline or has connectivity issues, it won't meet MO504 requirements.

The examples you're showing look very simple. Can my SMS look like this?

Yes. Your SMS can be as simple as you like – provided it captures all the mandatory requirements and any additional information you need to include having done your risk assessment.

This includes:

- developing procedures (for example lifejacket wearing, fatigue, drug and alcohol)
- training for crew (for example inductions, emergency preparedness and refreshers)
- emergency procedures (for example fire, master incapacitated, loss of steering)

I appreciate the SMS but who is to pay for this if not computer literate?

SMS have been a mandatory requirement for all domestic commercial vessels since 2013. Simplified SMS has been introduced to assist in reducing the administrative burden on operators, while upholding or improving safety.

You may choose to have a hand-written simplified SMS or consider using an SMS app if you are not confident using computers.

Make sure the SMS is legible and that you have a copy of it both on board (if possible) and onshore.



I only operate a small boat (4.5m). I'm generally just out line fishing solo; however, I do take friends and family members (not for payment) just as company or for their interest of fishing. How does this relate to my SMS requirements/obligations?

If you're taking friends and family out, make sure you're operating under the right conditions.

If your vessel has any certification (such as a certificate of survey, non-survey permit or certificate of operation) check the certificate allows you to carry the number of people you intend to have on board.

Fishing vessels are not allowed to carry passengers.

As part of your SMS, you will need to:

- consider the risks of having additional people on board, including how much experience they have on vessels
- what they are going to do (for example: be part of crew helping to retrieve fishing gear or sorting catch)
- ensure they are inducted onto the vessel, including covering what they need to do if you become incapacitated, your drug and alcohol policy and your lifejacket wear policy.

If you are planning to take them out recreationally, you need to ensure that you meet the conditions outlined in [Exemption 4 – Marine Safety \(Recreational use\)](#).

Resources

Are the previous webinar recordings available?

The previous webinar recordings and also the previous Q&A responses are available on the AMSA website.

You can find them here: [Past webinars | Australian Maritime Safety Authority](#)

Will the presentation slides be available?

Yes, an email with a copy of the presentation slides will be sent to attendees after the webinar.

You can also find a copy of the slides on the AMSA website: [Past webinars | Australian Maritime Safety Authority](#)

Where can we find the questions from the last presentation?

The questions for the last two webinars (fatigue and general SMS requirements) can be accessed on the AMSA website here: [Past webinars | Australian Maritime Safety Authority](#)

The questions from each webinar are under the 'Q & A' heading.



EPIRB

Do we need to reregister EPIRBS with AMSA once every 2 years?

From 4 November 2024, AMSA no longer requires you to renew your registration every two years. You do need to update your registration whenever your contact details or beacon details change. Don't wait for your registration to expire before doing this because incorrect contact details can also delay the response. When your details change, update your registration online update your registration online or by calling 1800 406 406.

How often should I test my EPIRB?

You need to follow the manufacturer's guidelines on how to perform a self-test and how often. Some manufacturers recommend that you self-test the beacon periodically, either once a month, or prior to a planned trip. It is also important to remember that over testing can drain the battery.

Other questions

When you state that the Master of the vessel being the owner of the vessel, does the Master of the commercial vessel need to hold a Master qualification or can a coxswain be considered the master of the vessel?

The master of a vessel means the person who has command or charge of the vessel but does not include a pilot.

If the vessel is less than 12m in length, the master may hold a Coxswain qualification.

However, they must only perform the duties and functions that their certificate of competency allows them to perform.

If the owner of a small boat is a business, should the name be the business or the employee who is operating?

The 'owner' listed in the vessel and contact details component of the SMS should be the name of the business. Where an employee operates the vessel, they should be referred to separately.

The vessel and contact details section of the SMS should also include contact details of a person who can be contacted at any time about the operation of the vessel.

If the owner is not the master of the vessel, the simplified SMS will also need to include a master's responsibility and authority statement.

The simplified SMS will also need to include a crew list detailing the name and contact details of each crew member, the name and contact details of their next of kin, capacity in which they are employed and details of their certificates of competency and other relevant certificates or qualifications.



For a hire-and-drive vessel, does at least one of the hirers need to hold a First Aid and CPR certificate?

There is no explicit requirement for a Class 4 hirer or participant to hold a first aid or CPR certificate in Marine Order 504.

Whether a Class 4 hirer or participant is required to hold a first aid or CPR certificate will be dependent on the vessel's risk assessment any applicable state or territory legislation that may apply.

Does AMSA provide a model drug and alcohol policy?

While AMSA has not published a model drug and alcohol policy, it has released guidance on the AMSA website.

You can find the guidance here: [Drug and alcohol policy - Class 1, 2 and 3. Guidance: Marine Order 504 changes.](#)

The guidance includes scenarios and examples, as well as links to useful resources.

Are red and orange flares required for a Class 4 hire-and-drive vessel operating within 2 nautical miles of shore?

The requirements for the carriage of flares on hire and drive vessels is set out in the [National Standard for Commercial Vessels – Part F2 \(Leisure Craft\)](#).

Class 4D vessels (operating in partially smooth waters) are required to carry 3 red star parachute flares, 2 red hand-held distress flares, 1 orange hand-held smoke signal if operating in remote enclosed sheltered waters or more than 2 nautical miles from land.

Class 4E vessels (operating in smooth waters) are required to carry 2 red hand-held distress flares and 1 orange hand-held smoke signal if operating in remote enclosed sheltered waters or more than 2 nautical miles from land.

Remote enclosed waters mean waterways where assistance from shore-based facilities or other vessels is not readily available and where rescue services would likely be required in the event of an emergency.

AMSA has developed guidance for these vessels:

[Vessel equipment guide - non-surveyed vessels with mechanical propulsion - 2D 3D 4D](#)

[Vessel equipment guide non-surveyed vessels - 2E 3E 4E](#)

Class 4C vessels (restricted offshore) are required to carry 3 red star parachute rockets, 2 red handheld distress flares and 1 orange handheld smoke signal.

All crew and passengers on a vessel including DCV < 7.5 meters must wear a PFD in Tasmania at all times. Does this apply in all other states?

Each state and territory can determine their own mandatory requirements for the wearing of lifejackets and who this may apply to.



Many states and territories have rules as to when you must wear a lifejacket and what type. For example, this could include for any person on a vessel up to a certain length or during heightened risk situations such as when the vessel is crossing coastal bars etc. We recommend contacting [state/territory marine safety agencies](#) to find out if additional lifejacket requirements apply to your operation.

It is important that vessel owners are familiar with the requirements in their local waterways, including lifejacket wear, and include this in their SMS where applicable.