Australian Government
Australian Maritime Safety Authority

Marine Order 54 (Coastal pilotage) Reissue

Consultation Report – July 2026

Contents

1. Introduction

Marine Order 54 (Coastal pilotage) 2026 is a reissue of Marine Order 54 (Coastal pilotage) 2014. The commencement date of the reissued order is 1 September 2026.

Marine Order 54 (Coastal pilotage) 2026 is a reissue of *Marine Order 54 (Coastal pilotage) 2014*. The commencement date of the reissued order is 1 September 2026.

The main changes in the final order as compared to the draft Marine Order 54 (MO54) that was circulated for public consultation are:

- Check pilot system - The final changes aim to strengthen the check pilot system by shifting licence and renewal requirements from time-served criteria to competency-based training, including mandatory check-pilot-specific courses and a new Coastal Pilotage Proficiency Check (CPPC). AMSA will also update procedures, improve data capture, and enhance assessment processes to boost overall pilotage performance.
- Training, Continuous Professional Development (CPD) and alternative pathways - The final changes abolish the current trainee coastal pilot licence model by removing rigid sea-time and master-certificate requirements, enhancing it with a new alternative entry pathway. Under this pathway, candidates with STCW A-II/1 (or Navy equivalent) can progress by completing competency-based training aligned to STCW A-II/2, with pilotage providers conducting gap analyses to ensure required proficiencies are met.
- Risk management and SMS - The final changes will strengthen safety management system (SMS) requirements by expanding risk-management content, mandating alignment with ISO31000, introducing clearer criteria for significant amendments, and implementing a structured three-tier audit and review program to ensure higher standards of safety and accountability.
- Licensing framework - The final changes streamline the licensing framework to align it with AMSA's broader application processes, including abolishing the trainee licence requirement. Pilotage providers will no longer have fixed licence durations, provided their SMS remains current and approved. Stronger, best-practice-aligned licensing conditions will also be introduced for both pilots and pilotage providers.
- Compliance and Enforcement - The final changes remove the current demerit point system which is inefficient and administratively burdensome. The new MO54 strengthens enforcement powers—such as by expanding AMSA's ability to issue immediate suspensions without a show-cause process—to ensure faster, more effective regulatory action to protect safety and maintain high pilotage standards.
- The marine order has been formatted and restructured in line with the most current drafting style, in addition to updated definitions and removal of repetitions.

2. Consultation approach

Coastal pilotage is a specialised area in the shipping industry which has particular interest in specific groups of stakeholders. Coastal pilotage service providers, coastal pilots and pilotage training organisations are key stakeholders, with Maritime Safety Queensland (MSQ) Vessel Traffic Service (VTS) authorities and Great Barrier Marine Park Authority (GBRMPA) also having strong interest. AMSA's coastal pilotage team has been working closely with coastal pilotage providers, pilots and training organisations since MO54 came into force in 2014 to ensure a coastal pilotage regime that is safe, effective and fit for purpose.

The new marine order requirements were co-designed with an Industry Reference Group (IRG) over 8 meetings in 2024 -2025 and are designed to strengthen the framework. The IRG discussions, comprising representatives of pilotage providers, industry peak bodies, and unions, helped to guide the review and obtain early industry feedback on proposed amendments. The IRG broadly endorsed the regulatory changes to MO54.

3. Public consultation

Overview

The public consultation on the proposed draft MO54 took place between 9 February 2026 and 5 April 2026 for a period of eight weeks. A copy of the draft MO54 was placed on the AMSA website and social media including Facebook and Instagram for public comment. Notification of the public consultation was also emailed to key stakeholders including coastal pilotage providers, pilotage training organisations, port authorities, ship operating companies, pilotage and seafaring representative organisations, classification societies, shipping industry peak bodies and interested government departments and agencies inviting them to comment.

AMSA received 52 submissions from seven entities during the public consultation period. Feedback was primarily directed towards the proposed requirements for transitional arrangements, the alternative pathway entry program, suspension powers, definitions, and safety management system requirements. These matters collectively led to changes to the proposed regulatory requirements, which are captured in the final order.

While the feedback led to number of refinements in the final order, the overall response to the draft was constructive and broadly supportive of the reforms. As the policy settings had already been co-designed with the current coastal pilotage providers and broader pilotage industry bodies through the IRG process, no major or unexpected concerns were raised during the formal consultation period. The majority of submissions sought clarification of specific provisions rather than raising substantive objections to the overall direction of the reforms.

Key issues arising from feedback and AMSA's response

In reviewing industry feedback, stakeholder submission comments were categorised into 16 key areas. The greatest volume of input related to transitional arrangements, with 11 submissions making comment on this area. Significant commentary was also provided on alternative pathways (8 submissions), alongside 6 submissions seeking clarification on specific provisions. Matters concerning suspension powers and definitions each attracted 5 submissions, while safety management system requirements were raised in 4 submissions. The remaining issues received one or two submissions each, indicating more targeted but still relevant stakeholder interest. A detailed analysis of all 16 areas is set out in the following section.

Summary of submissions

Activity	Received	Confidential	Public
Public Consultation	7	4	3

Key issue 1: Transitional arrangements

Feedback: The consultation feedback raised concerns about unclear and insufficient transitional and licensing arrangements under the new order, including limited guidance on the transition and renewal of pilotage and training provider licences, as well as pilot and check pilot certifications. Stakeholders noted uncertainty around renewal timelines and whether existing approvals would automatically transition to the new marine order. Additional issues raised included risks associated with broad grandfathering provisions that could extend approvals indefinitely, inconsistencies in approving providers versus courses, and the suitability of allowing check pilots trained under the previous framework to assess without retraining.

Response: The transitional arrangements and licensing timeframes have been strengthened to address the concerns raised through submissions received during the public consultation process.

This was done through including defined implementation periods, including six months for pilotage providers to comply with the new order; twelve months for check pilot licence issue; and twelve months renewal requirements for both pilot and check pilot licences. Existing check pilots were consulted on and supportive of this approach. A three month trial of the updated Form 15 has been completed to ensure familiarity and readiness with these requirements. In addition, the current Check Pilot Training Course has been mapped to IMO Model Course 1.30, with no competency gaps identified, and therefore no additional transitional training is required. These measures ensure continuity while maintaining competency standards under the new framework.

What changed in the final order: Division 7 (sections 30–31) of the final order now sets out defined transitional windows: a pilotage provider licence in force under Marine Order 54 (Coastal pilotage) 2014 on 31 August 2026 continues until the earlier of its expiry or 28 February 2027 (a six-month implementation period); a pilot licence in force on 31 August 2026 continues until its own expiry, and AMSA may re-issue it under the 2014 criteria for applications made before 31 August 2027 (a twelve-month period); and, under Schedule 3 clause 3, the new check pilot licence criteria only apply to applications made on or after 1 September 2027 — before that date, applicants may instead meet the 2014 criteria. Training course approvals in force on 31 August 2026 continue as approved training course provider status until 31 August 2027 (section 31). See also the additional item on phased commencement of the Portable Pilotage Unit (PPU) and helmet requirements in Section 4 of this report, which forms part of the practical transition but was not the subject of specific consultation feedback.

Key issue 2: Alternative pathway program

Feedback: A substantial number of submissions noted that master level certification and command experience are essential for safe operations in the Great Barrier Reef. Some stakeholders opposed including Chief Mate <3000 GT and watchkeeper qualifications as alternative pathways. Gaps were identified, including the omission of Master <3000 GT and inconsistencies in recognising existing qualifications that already permit watchkeeping duties. Concerns were also raised about how Royal Australian Navy experience is treated, with a need for targeted gap training due to overlap in competencies. Additionally, better alignment of entry pathways with existing certification frameworks was recommended. One stakeholder also called for new transitional arrangements, particularly for domestic masters, to ensure a fair and practical implementation.

Response: During IRG discussions, the majority of members did not consider master (unlimited) level certification essential for coastal pilotage, noting workforce constraints and the need for flexible alternative pathways, as reflected in other Australian and international pilotage regimes. The final pathway has been designed to account for varying qualifications, with tailored training requirements to ensure competency. Agreed equivalent qualifications as discussed in the IRG and proposed in the public consultation have therefore been retained, with updates to accommodate navy qualification requirements, informed by input from the Navy course coordinator. Master <3000 GT and Master <500 GT qualifications were unintentionally omitted and have now been included in the final marine order. Although some providers questioned whether accommodation should be made for lower or equivalent qualifications, these have been recognised in the final order to better enable alternative pathways and facilitate workforce growth, noting that lower qualification holders will still need to upskill to achieve an equivalent skill level to that of STCW Code A-II/2 standard for master and chief mates on ships of 500 gross tonnage or more, for all pilots.

What changed in the final order: Schedule 3, clause 1(2)(b) of the final order has been amended to add a certificate of competency as Master <3000 GT and a certificate of competency as Master <500 GT (new subparagraphs (A) and (B)) to the list of qualifications a person may hold before commencing the alternative pathway program, alongside the previously listed Chief Mate at least 3000 GT, Chief Mate <3000 GT, Watchkeeper Deck certificates and equivalent certificates of recognition.

Key issue 3: Clarification of certain requirements

Feedback: The consultation feedback raised a range of concerns regarding proposed training, operational responsibilities, and regulatory wording. Stakeholders questioned whether the check pilot course should incorporate local knowledge and safety management systems, and whether it replaces existing qualifications such as the TAFE Cert IV. Concerns were also raised about the replacement of assessment transits with check pilot voyages. Operational obligations were highlighted, including a view that hiring a helicopter should not impose the same responsibilities as owning or operating one. Additionally, stakeholders noted that the use of terms like "ensure" may create unreasonable liability for matters beyond a provider's control, and that describing pilots as "operating" a vessel conflict with their legal role and existing regulatory frameworks. Questions were also raised about the requirement for check pilots to obtain a letter of support from their current employer.

Response: The final marine order clarifies that the CPPC is not intended to replace the TAFE Cert IV, but to operate as an additional competency assessment, with new check pilot courses focusing on human factors and mentoring while old Cert IV remains assessment focused. The transition from assessment transits to check pilot voyages reflects an approach already established under the current order rather than a new requirement. Pilotage providers retain a duty of care to ensure third party service providers, such as helicopter operators, comply with the order. Concerns about liability have been addressed by revising the term “ensure” to “arrangement in place” to more accurately reflect shared responsibilities of pilots. It is AMSA’s view that these clarifications regarding the new requirements support the intended safety outcome by preserving rigorous competency assessment and aligning liability with the party best placed to control the risk.

What changed in the final order: Schedule 2, clause 4 of the final order now reads: “the pilotage provider must have arrangements in place to ensure that the pilot remains on duty…”, replacing the consultation draft's “the pilotage provider must ensure that the licensed pilot remains on duty…” — the specific wording change described in AMSA's response. The definition of “operate” has been removed from the order (see Key Issue 5), addressing the concern that describing a pilot as “operating” a vessel conflicted with their legal role. The letter of support requirement for check pilots (Schedule 3, clause 3(1)(c)) is retained unchanged. On the Cert IV point, Schedule 3, clause 3(1)(d)(i) confirms that check pilot specific training approved by AMSA is retained as a licensing criterion in place of the TAFE Cert IV pathway required under the current (2014) order. This was discussed and agreed at the Industry Reference Group, on the basis that a dedicated check pilot specific course rather than the general Cert IV qualification better equips check pilots with the specific skills needed to perform the check pilot role.

Key issue 4: Suspension provision

Feedback: The consultation feedback raised concerns about the consolidation of variation, suspension, and revocation powers into a single provision without clear distinction between pilots and providers. Stakeholders were concerned that the draft could allow enforcement action against providers even where they were not at fault, such as incidents caused by human error on the bridge. Use of the term “reasonably believes” was seen as overly subjective and lacking clear guidance. Concerns were also raised about inconsistencies between the show-cause process and immediate suspension powers, including unclear notice periods and review timeframes. Additionally, stakeholders noted that the draft may permit immediate suspension of a pilot licence following an incident without providing the pilot an opportunity to respond or contest preliminary findings.

Response: The final marine order was substantially updated to address concerns raised in the consultation feedback. Separate provisions have now been introduced to distinguish between regulatory actions for pilots and pilotage providers. The framework also clarifies that pilotage providers are not subject to immediate suspension, with appropriate notice requirements incorporated to ensure procedural fairness. Updates have been made to the notification and process arrangements, ensuring clearer alignment between immediate suspension powers for pilots and the show-cause process for both pilots and providers. The use of the term “reasonably believes” has been retained, as it is consistent with the current order and the Navigation Act

What changed in the final order: Section 16 of the final order now splits variation, suspension and revocation into subsection 16(1) (pilotage provider licences) and subsection 16(2) (pilot licences); only pilot licences can be suspended immediately without prior notice, under paragraphs 16(2)(c) (collision or grounding) or (d) (AMSA reasonably believes it necessary for marine safety). A new section 17 sets out notice and show-cause requirements separately for immediate suspensions (maximum 6 months, extendable to a combined 12 months) and for all other variation/suspension/revocation decisions, and a new section 18 (“Effect of suspension”) clarifies that a suspended licence holder is treated as unlicensed while the suspension is in force.

Key issue 5: Definitions

Feedback: The consultation feedback identified several gaps and ambiguities in definitions in the draft order. Stakeholders noted that “approved auditor” is not clearly defined and that there is no publicly available list of approved auditors. Concerns were raised that requiring a pilot to “remain on duty” may imply a lack of provision for rest within pilotage areas. The definition of “operate” was also considered unclear, particularly in relation to whether activities such as chartering a vessel or helicopter constitute operation. Additionally, stakeholders highlighted that the regulation appears to rely on outdated standards, with limited flexibility to recognise modern alternatives that achieve equivalent performance outcomes.

Response: The feedback has been addressed through targeted revisions and clarifications. An approved auditor list will be published on the AMSA website prior to the order commencing (from 1 September 2026), with auditors required to hold ISPO certification. The definition of “on duty” aligns with the existing MO54, including periods when a vessel is at anchor, and will remain unchanged, with fatigue risks expected to be managed by pilotage providers through their FRMP. The definition of “operate” has been removed and related provisions updated accordingly. Requirements for bridge simulators continue to align with STCW A I/12 performance standards, consistent with AMSA's established approach for simulator approval across other STCW courses in Australia.

What changed in the final order: Section 4 of the final order replaces the single undefined term "approved auditor" with five specific defined terms: approved compliance auditor, approved training course auditor, approved training course provider, approved bridge resource management course and approved fatigue management course each tied to an approval power in the new section 24. The definition of "operate" has been deleted, and the definition of "pilotage crew" has been reworded ("each seafarer of any pilot launch", dropping the reference to "operated by the pilotage provider") as a consequence. "On duty" and the bridge simulator standard are unchanged.

Key issue 6: Safety management system

Feedback: Some submissions sought clarification on several SMS provisions in the draft order. Stakeholders asked whether the previous 0.05 alcohol limit has now shifted to a zero tolerance requirement. They also raised concerns about the obligation for pilotage providers to verify that helicopter operators hold a current AOC, suggesting the provision be amended to require written evidence of a valid CASA AOC. Further comments questioned the qualification requirement for the designated person, noting that "experience in pilotage services" could be interpreted as administrative rather than maritime experience, and recommending a minimum of five years as a licensed coastal pilot or Master operating within compulsory pilotage areas. Finally, stakeholders highlighted practical difficulties with pilotage provider obligations to maintain and verify records for personal flotation devices they do not own or control, recommending AMSA mandate AS 4758 compliant lifejackets and make pilots responsible for their maintenance and record keeping

Response: There was no alcohol limit specified in the previous marine order; instead, the SMS required pilotage providers to have a drug and alcohol policy in place. The new order maintains this requirement and adds an explicit condition that pilots must not be under the influence of drugs or alcohol while on duty. Stakeholder discussions confirmed that pilots already operate under a zero alcohol policy. Regarding helicopter operations, the draft provision already reflects the intent of the recommendation: the pilotage provider must ensure—by reviewing certificates and documents—that the helicopter operator holds a current CASA AOC and complies with CASA flight safety requirements, consistent with the provider's responsibility for coastal pilot safety. In relation to the designated person, this role is appointed by the pilotage provider to ensure ongoing adherence to the SMS, including regular internal and external audits. It is not appropriate to prescribe specific qualification requirements for this role; rather, the safety outcome can be achieved through the appointment of a person with relevant maritime experience, and the interpretation of “experience in pilotage services” should be determined by the provider. IRG discussions supported this approach. Finally, Schedule 2 requires that the pilot be provided with a lifejacket, and the provider must ensure this occurs. The contractual arrangements between providers and pilots are outside the scope of the marine order; however, the provider remains responsible for ensuring compliance with this requirement. Its AMSA’s view that these clarifications strengthen the overall safety outcome for coastal pilotage in the Great Barrier Reef by keeping a clear zero alcohol standard, reinforcing provider accountability for helicopter operator certification and pilot lifejacket compliance, and ensuring the designated person role is filled by someone with genuine maritime experience relevant to the SMS.

What changed in the final order: Schedule 4, clause 1(b) (pilot must not be under the influence of drugs or alcohol while performing duties) and Schedule 1, clause 2(m) (drug and alcohol policy and pre-boarding verification procedure) are unchanged in substance from the consultation draft and no further drafting change was required. The designated-person qualification wording (Schedule 1, clause 3(2)(a): “have experience in pilotage services”) is also unchanged. Note, however, that the personal flotation device / locating equipment requirements themselves have changed in the final order for a different, technology-related reason as detailed in section 4 of this report.

Key issue 7: Vessel transit

Feedback: The consultation feedback generally supported the removal of passenger vessel experience requirements but suggested introducing specific vessel-type experience (such as container ships, bulk carriers, or tankers), noting that navigation in the pilotage area is not confined and involves relatively wide channels. Stakeholders also raised concerns that the minimum voyage requirements for the alternative pathway program are excessive and may create unnecessary barriers to entry.

Response: While stakeholders supported specifying particular vessel types, the proposed voyage requirements have already been significantly reduced from 200 to 100 transits compared to the existing MO54, reflecting a more balanced and achievable standard that still maintains strong safety outcomes. These numbers are based on analysis of actual vessel transits over a three-year period in the Inner Route, indicating that approximately 60% are bulk carriers, with tankers and container ships each representing around 10%. Accordingly, the proposed requirements are considered appropriate, proportionate, and aligned with operational activities, and will remain as set out in the draft MO54 and supported during IRG discussions. AMSA considers any further reduction in the number of vessel transits, or lowering of the minimum voyage requirement, would not result in the equivalent safety outcome needed in these particularly sensitive sea areas.

What changed in the final order: No change between the consultation draft and the final order both already specify 100 transits for a check pilot licence (Schedule 3, clause 3(4)), including the vessel-type mix (50 UKCM-system transits, 10 container, 10 tanker, 50 bulk carrier). AMSA's response compares this figure to the pre-existing 2014 order (200 transits), not to a change made after consultation.

Key issue 8: Training

Feedback: The feedback raises two technical concerns in this area. First, stakeholders noted an inconsistency with other marine orders in applying IMO Model Course 6.10 and the 10:1 instructor to student ratio to STCW approved courses but not to MO54, recommending that any simulators used for pilot training comply with STCW Regulation I/6, including requirements for instructor qualifications. Second, they sought clarification on human factors training for check pilots, asking whether this training is embedded within an approved coastal pilotage training program or whether it must be completed separately.

Response: AMSA acknowledges the feedback but notes that it is not necessary to be prescriptive in the marine order regarding simulator requirements. STCW Regulation A I/12 already sets out clear and comprehensive standards for instructors and the use of simulators, and these same requirements apply to any applicant seeking approval to deliver training courses. AMSA reviews all STCW course requirements as part of its approval process for course providers, ensuring compliance with the regulation.

Regarding the second query, AMSA confirms that human factors training for check pilots is not embedded within any approved coastal pilotage training program; it is a separate course that must be completed independently.

What changed in the final order: No change between the consultation draft and the final order. The STCW A-I/12 simulator standard (referenced in the "approved bridge simulator" definition and section 24(1)(c)) and the standalone human-factors training approval (section 24(1)(l)) both appear unchanged.

Key issue 9: Check pilot assessment

Feedback: The feedback notes that while the proposed requirement seeks to ensure independence in check pilot assessments by preventing a check pilot from assessing someone they have already conducted a check pilot voyage assessment on in the same licence period, this safeguard is impractical in single provider pilotage areas such as the Whitsundays, where all check pilots work for the same organisation and routinely assess one another.

Response: AMSA acknowledges the feedback regarding the feasibility of ensuring check pilot independence under the proposed requirement. Historically, check pilots from the same pilotage provider have conducted pilot assessments on AMSA's behalf across all pilotage areas, including the Whitsundays, and the proposed requirement represents a significant improvement to current practice where the same check pilot may assess a pilot each year. This requirement is considered important to strengthen standards and achieve an acceptable safety outcome. AMSA will closely monitor this change to ensure it is not having adverse consequences.

What changed in the final order: No change between the consultation draft and the final order. The independence requirement (a check pilot must not have conducted the pilot's last check pilot voyage or CPPC in the same licence period) is retained unchanged in Schedule 5, clauses 1(2)(b) and 3(b).

Key issue 10: New check pilot licence

Feedback: The feedback indicates that there is a requirement for check pilots to hold an unrestricted licence for at least two years. One stakeholder has raised concerns about delays in obtaining a check pilot licence. They suggest that allowing unrestricted licence renewal and the issuance of a new check pilot licence to occur simultaneously would streamline processing and reduce administrative wait times by approximately one month.

Response: There is no minimum time limit governing when a restricted pilot licence holder may progress to becoming a check pilot. Check pilots are subject to distinct course, voyage and assessment requirements, and have always been required to hold a valid unrestricted pilot licence, complete the necessary number of transits in the relevant area, and maintain the same expiry date as their unrestricted licence. AMSA does not identify any issue with the current requirement to issue a check pilot licence and considers the existing framework appropriate for ensuring competence and consistency across pilotage areas.

What changed in the final order: No change between the consultation draft and the final order. The check pilot licence criteria in Schedule 3, clause 3 do not impose a minimum two-year unrestricted-licence holding period.

Key issue 11: Fatigue risk management plan (FRMP)

Feedback: One feedback suggests that the default FRMP could be strengthened by explicitly incorporating pilotage provider rest areas within the SMS framework, focusing only on rest breaks between vessels. Other feedback suggests that the FRMP should also account for rest breaks taken during pilotage and the duration of individual pilotages to ensure a more comprehensive and realistic approach to managing fatigue risks.

Response: AMSA acknowledges the feedback and clarifies that the previous order referred only to a fatigue risk management plan (FRMP), which some pilotage providers treated as a default FRMP requiring approval. Under the final order, the requirement is for a pilot provider's FRMP, meaning providers are not bound to follow the sample FRMP published on the AMSA website; they may use it as a reference but must develop their own FRMP tailored to their operations. Importantly, there is no requirement for separate FRMP approval, as the FRMP now forms part of the provider's Safety Management System.

What changed in the final order: Schedule 1, clause 2(b) of the final order now reads "the pilotage provider's fatigue management plan including how compliance with the plan is achieved" (previously "how compliance with the pilotage provider's fatigue risk management plan is achieved"), and the term used throughout the order has shifted from "fatigue risk management plan (FRMP)" to "fatigue management plan".

Key issue 12: Inquiry

Feedback: The feedback expresses concern that AMSA's power to inquire into pilotage provider activities is framed too broadly. It suggests that both the scope and methodology of AMSA's inquiries should be more clearly defined to provide greater transparency and certainty for pilotage providers.

Response: AMSA acknowledges the feedback and notes that the concern raised does not reflect a change in regulatory powers. The current requirement is the same as the new requirement: AMSA has the authority to inquire into the activities of a pilotage provider as part of overseeing a provider licence, which is issued with a number of conditions. This power ensures AMSA can verify compliance with safety, operational and licensing obligations, and remains an essential component of effective regulatory oversight.

What changed in the final order: Section 19(1) of the final order (previously section 17 in the consultation draft) now reads “AMSA may inquire into the provision of coastal pilotage services”, in place of the consultation draft's “AMSA may inquire into the activities of a pilotage provider.” In the current 2014 order, the inquiry power is expressed as a residual saving clause. Section 24(1) states that the compliance audit Subdivision “does not limit the power of AMSA to inquire into the activities of a pilotage provider”, with a separate, near-identical saving clause at section 83(1) for approved training providers. The final 2026 order consolidates both into a single freestanding grant of power in section 19(1), applying broadly to “the provision of coastal pilotage services” rather than being tied to, and framed as not limited by, the audit provisions for providers and training providers separately. The underlying authority is consistent with the current order, the final draft states it as a direct power rather than a savings clause and merges what were two separate provisions (sections 24 and 83 of the 2014 order) into one.

Key issue 13: Penalty unit

Feedback: The feedback seeks clarification on the application of penalty units, noting that the term is not defined in the draft and questioning whether penalties apply to an individual pilot or to the pilotage provider.

Response: Further clarification is not required in the marine order itself, as penalty units are already defined in MO01, which applies across all marine orders. Additional explanatory detail is provided in the Explanatory Statement.

What changed in the final order: Section 3 of the final order gains a new subsection (3): “Section 341 of the Navigation Act provides for the imposition of penalties not exceeding 50 penalty units for offences against the regulations.” This is additional context for the existing penalty provision (now section 26(2), previously section 27(2), which sets a 50 penalty unit maximum for failing to comply with an AMSA direction). It does not itself define “penalty unit” or specify whether penalties apply to a pilot or a provider that is consistent with AMSA's response that this detail sits in MO01 and the Explanatory Statement rather than in MO54.

Key issue 14: Sea time reduction

Feedback: The feedback raises concerns that removing the 36 month sea service requirement for new pilots could introduce systemic safety weaknesses by compressing the development of practical experience and placing excessive reliance on competency validation. Some stakeholders are of the view that the existing sea time requirement acts as a core safety barrier underpinning pilot competence, environmental protection and regulatory credibility. They suggest a transitional reduction to 12 months of sea service, supported by enhanced supervision, structured assessment, and robust competency validation, as a way to modernise regulation while keeping overall risk ALARP.

Response: AMSA confirms that, as discussed during the IRG meeting, the decision to remove the standalone 36 month sea service requirement was based on the competency standards already embedded within the certification pathways. A prospective pilot who holds a Master 3000 GT Certificate of Competency will have completed the sea service obligations required under the STCW Convention, ensuring they possess the necessary maritime experience before entering pilot training. For candidates progressing through an alternative pathway, the combination of required sea time for their certificate of competency and the completion of structured tasks provides a skill set closely aligned with that of an experienced pilot. On this basis, AMSA considers the revised approach to be robust, appropriate, and fully aligned with established competency frameworks.

What changed in the final order: No change between the consultation draft and the final order. Neither draft contains a standalone 36-month sea-service requirement; both rely on the sea-service obligations embedded in the underlying certificate of competency

Key issue 15: Typo

Feedback: The feedback notes a minor typographical issue in Schedule 3(3)(1)(d)(iv), where a missing “d” at the end of the sentence was identified.

Response: AMSA acknowledges the feedback and confirms that the typographical error in Schedule 3(3)(1)(d)(iv) has been corrected. The clause has been updated using contemporary drafting conventions, including the removal of redundant ‘and’ from subclauses, to improve clarity and consistency.

What changed in the final order: The typographical correction itself is reflected in the final order. The correction was not applied in isolation, the surrounding clause was redrafted using contemporary drafting conventions, including removing redundant “and” connectors between subclauses, so the fix forms part of a broader tidy up of that clause rather than a single word edit.

Key issue 16: Out of scope

Feedback: The feedback contends that introducing competition into the Great Barrier Reef pilotage sector is unsuitable, noting that pilotage is an essential safety service with high infrastructure costs and specialised expertise, making it functionally a natural monopoly rather than a market that benefits from competitive pressures. Some stakeholders observed that previous attempts at competition triggered price wars, duplicated operational costs, reduced investment and training, and heightened risks to safety and environmental protection. They also recommended that AMSA commission an independent risk based review and develop a pilot exemption framework to strengthen the management of operational and safety risks.

Response: AMSA acknowledges the feedback and notes that the matters raised fall outside the scope of the marine order review. The review did not consider broader structural or market based issues such as competition, nor the development of a pilot exemption framework. AMSA does not plan to undertake such reviews at this stage, as the current exemption model is operating effectively.

What changed in the final order: Not applicable — AMSA has confirmed this matter is out of scope of the MO54 reissue, and no drafting change arises from it.

4. Additional refinements incorporated in the final Marine Order

In comparing the consultation draft to the final MO54, several further substantive changes were identified that are not explained by, or traceable to, any of the 16 key issues above. That is, they do not correspond to a specific stakeholder submission summarised in Section 3. They are set out below, so the report gives a complete picture of what changed between the draft and final order.

4.1: Remedial action and AMSA observation following unsatisfactory check pilot findings

Provision: Schedule 2, clause 1(2)-(3) (new)

What changed: The final order adds a requirement that, following any unsatisfactory finding from a check pilot voyage, the pilotage provider must facilitate implementation of an AMSA-approved remedial action plan and a further check pilot voyage for the pilot concerned, and must not assign further pilotage to that pilot until those measures are satisfactorily completed. Providers must also facilitate AMSA observing any CPPC or check pilot voyage on request. This is supported by two new approval powers in section 24(1)(q)–(r) (approval of a checklist for a check pilot voyage, and of a remedial action plan).

Reason: This appears to strengthen the check pilot assessment and pilot performance framework, consistent with the reissue's stated aim (see Introduction) of enhancing assessment processes to boost overall pilotage performance.

4.2: Phased commencement of the Portable Pilotage Unit (PPU) and pilot helmet requirements

Provision: Schedule 4, clause 1(h) and 1(q)

What changed: In the consultation draft, the requirements for a pilot to use an independent PPU and to wear a protective helmet during transfer applied from the Marine Order's general commencement date. In the final order, both requirements instead commence "from 1 March 2027", a six-month delay after the Order's 1 September 2026 commencement date.

Reason: This is a transitional matter and reflects lead time needed for pilots/providers to procure and train on compliant equipment.

4.3: Written examination and chart exam requirement spelled out explicitly

Provision: Schedule 3, clause 1(1)(g)(i) of the consultation draft; Schedule 3, clause 1(1)(i) of the final order

What changed: The consultation draft's restricted pilot licence criteria included, at clause 1(1)(g)(i), a requirement to satisfactorily complete “any competency assessment approved by AMSA or competency check that AMSA determines equivalent” — a broad term. “Competency assessment” is itself defined in section 4 to include a check pilot voyage, a CPPC, or “a written or oral examination or other kind of examination approved by AMSA”, meaning a written exam and chart exam were already captured within that general wording. The final order replaces this catch-all with its constituent parts spelled out separately: clause 1(1)(h) (check pilot voyage), clause 1(1)(i) (a written examination approved by AMSA, including a chart exam for the stated compulsory pilotage area applied for, if applicable) and clause 1(1)(j) (training workbook).

Reason: This is not a new substantive requirement, and it does not add anything beyond what is already required under the current Marine Order 54 (Coastal pilotage) 2014. It reflects modern drafting style — replacing a single broad, generic reference to “competency assessment” with its individual components spelled out as discrete, named criteria, so a reader of Schedule 3 can see exactly what must be completed (a check pilot voyage, a written/chart exam, and a training workbook) without having to cross-refer to the general definition in section 4.

4.4: Pilot launch and helicopter transfer locating equipment upgraded from MSLS/PLB to GNSS/AIS

Provision: Schedule 5, clauses 2–4 of Marine Order 54 (Coastal pilotage) 2014; Schedule 2, clauses 10(2) and 11(2)–(3) of the consultation draft and final order

What changed: The current 2014 order (Schedule 5) requires a 121.5 MHz MSLS unit plus a 406 MHz EPIRB/PLB with GPS capability for pilot launches, helicopter transfers and PFDs (clauses 2–4). The consultation draft did not include the standalone MSLS device, moving to a self-activating, water-activated 406 MHz PLB/EPIRB with GNSS capability (Schedule 2, clauses 10(2), 11(2)(a)(ii)). The final order goes further: the standard is updated to AS/NZS 4280.2, and pilot launch crew must also be provided with a self-activating AIS locating device, with the launch required to carry equipment to receive and alert crew to that AIS signal (Schedule 2, clause 11(2)(a)(iii), (3)) — a capability absent from both earlier versions.

Reason: This continues a modernisation already underway in the consultation draft — moving from the 2014 order's MSLS technology to GNSS, and then adding AIS, which alerts nearby vessels faster than a PLB/EPIRB alone. The AIS addition wasn't raised in submissions or addressed in AMSA's Key Issue 6 response, but both pilotage providers were separately asked what equipment they currently use or plan to move to, and both confirmed they already use, or are transitioning to, AIS/GNSS-compliant devices — so the requirement is achievable and reflects existing practice.

4.5: Training, CPD and CPPC triggers moved from prescriptive requirements to AMSA discretion

Provision: Schedule 4, clause 5

What changed: The consultation draft imposed a blanket obligation on pilots to complete any AMSA-approved coastal pilotage training course or continuing professional development required, and required a CPPC after any incident, after an unsuccessful check pilot voyage, or following suspension. The final order instead empowers AMSA to require training/CPD by written notice only "if AMSA reasonably considers" it necessary for the pilot to perform their duties safely and requires a CPPC where the pilot has not performed duties for more than 6 months, where AMSA "reasonably considers that an event involving a piloted vessel may indicate a concern about the pilot's performance or competency", or where the licence has been suspended.

Reason: This shifts from automatic/prescriptive triggers to a risk-based, AMSA-assessed standard, which is broadly consistent with the reissue's shift toward competency-based regulation.

4.6: Refinement of the definition of "incident" to remove overlap with the Navigation Act

Provision: Section 4 (definitions)

What changed: The consultation draft defined "incident" to include a marine incident, an illness of a person that may affect the safe operation of the vessel, a close-quarters situation, machinery or equipment failure that may affect the safe operation of the vessel, and pollution from the vessel (including sewage or garbage). The final order narrows this to a marine incident, a machinery or equipment failure that affected the safety or safe navigation of a vessel, and a discharge or probable discharge of pollution (including a loss of container or a prescribed incident under the Protection of the Sea (Prevention of Pollution from Ships) Act 1983) — removing "close quarters situation" and “illness of a person” as standalone triggers, and narrowing the equipment-failure trigger to one that actually affected safety, rather than one that merely “may affect” it.

Reason: This was a deliberate drafting refinement. “Close-quarters situation” was removed because it is already captured within the definition of “marine incident” under the Navigation Act 2012, retaining it as a separate, standalone trigger in MO54 duplicated an outcome the Navigation Act definition already covers, and its removal avoids two overlapping definitions producing inconsistent or duplicated reporting obligations under Schedule 2, clause 8. This confirms the change should not be read as narrowing the practical scope of what must be reported. A close-quarters situation still falls within “incident” via the Navigation Act's “marine incident” definition.

4.7: Consolidated approvals framework

Provision: Section 24 (new, replacing more limited provisions in the consultation draft)

What changed: The final order introduces a single, comprehensive section listing every kind of approval and equivalence determination AMSA may make under the order (compliance auditors, training course auditors, bridge simulators, bridge resource management courses, fatigue management courses, UKCM competency checks, written examinations, training workbooks, alternative pathway program participation, check pilot training, human factors training, mentor training, psychometric assessment, oral examinations, CPPC conductors, check pilot voyage checklists, and remedial action plans).

Reason: This is largely a consequential, administrative formalisation of the new defined terms addressed under Key Issue 5 (Definitions).

5. Further information

AMSA has developed related policy, guidelines, and other necessary reference materials to support the implementation of the amended MO54. Please visit AMSA’s website here.

If you require further information, please contact AMSA Connect.