



Fatigue management on domestic commercial vessels

AMSA webinar 6 May 2026

On 6 May 2026, the Australian Maritime Safety Authority (AMSA) hosted a webinar for domestic commercial vessel (DCV) owner/operators and maritime professionals, about fatigue management on DCVs.

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

Questions and answers

What does AMSA consider an acceptable break in a 12-hour shift?

It is important that you provide regular flexible breaks during shifts as part of your fatigue risk management plan. More frequent breaks may be required for longer shift work, higher risk work or if crew members are exposed to other fatigue-related hazards. This is to be considered as part of your fatigue risk management plan. If you can't shorten long shifts (e.g. 12-hour shift), then you may need to provide more frequent breaks and give crew members control over when they take breaks

For reference, Safe Work Model Code of Practice: Managing risk of fatigue has guidance around sufficient breaks while at work.

Why do AMSA keep approving minimal crewing exemptions to lessen the experience/qualifications of the crew onboard the vessel?

AMSA recognises the diverse nature of the DCV's around Australia and the need for flexibility to ensure a safe and viable industry. Exemptions under the National Law provides for that flexibility.

AMSA does not approve minimal crewing exemptions to reduce the experience or qualifications of crew. Exemptions allow a vessel to operate outside the standard requirements of the National Law, but they are only granted where the applicant can clearly demonstrate that safety will be maintained through alternative arrangements.

AMSA's power to grant specific exemptions is not to allow applicants to avoid compliance with the National Law because it is inconvenient, expensive or time-consuming. While AMSA is open to working with operators, we expect operators to comply with the National Law and applicable standards. When exemptions are granted, they apply only for the period specified by AMSA and must



be supported by evidence from the applicant demonstrating a practical pathway to achieving compliance within that timeframe.

For more information visit AMSA's Exemptions from the [DCV National Law Policy](#) on our website.

Does AMSA follow STCW guides for navigation watch hours of rest in the NSCV system? (ie Marine orders 500's) If not, what is the maximum navigational watch length allowed?

The STCW requirements for hours of rest and watchkeeping as implemented by *Marine Order 28 (Operations standards and procedures) 2025*, do not apply to DCVs.

Instead, DCVs must comply with the National Law.

While there is no prescribed maximum navigational watch length under the National Law, DCV owners must ensure that their vessel is appropriately crewed. The determination of appropriate crewing must consider the risk of fatigue and must be at least equal to or greater than the prescribed minimum crewing numbers that apply to the vessel under Marine Order 504 (Certificates of operation—national law) 2024 (MO504), unless an exemption applies.

Where the appropriate crewing number is equal to the prescribed minimum crewing number, the master and each crew member must be provided with at least 10 hours of rest in each 24-hour period.

We keep getting told to take our breaks on the run (onboard the vessel). There is no list of adequately trained watchkeepers provided by the employer. What are your thoughts on this, should we be provided this list and or should the breaks be taken away from operational times?

We can provide general information on the regulatory requirements, you should give consideration to your individual circumstances.

DCV owners must determine the appropriate crewing for their vessel, taking into account the risks associated with the operation, including the risk of fatigue for the master and crew. This should include ensuring there are sufficient suitably qualified crew to operate the vessel safely. As part of this process, DCV owners should consult with the master and crew.

The owner must then ensure that the vessel operates with the appropriate crewing numbers at all times. The appropriate crewing numbers should also be reviewed where risks change. Where the appropriate crewing number is equal to the prescribed minimum crewing number, the master and each crew member must be provided with at least 10 hours of rest in each 24-hour period.

'Rest' is defined in MO504 as a period of time when a person is, except in the case of emergency, free of all duties and functions.

The master and each crew member must be provided with sufficient periods of rest to allow them to recharge before recommencing work.

AMSA has published guidance to support navigational watchkeeping on DCVs. This guidance includes recommendations for voyage planning and watchkeeping schedules and can be accessed on [AMSA's website](#).



How does AMSA envision fatigue being managed in a 24/7 operation with little room for fatigue management during a shift (12-13hrs length)

It is important to plan ahead and having a fatigue risk management plan means there is consideration of how fatigue or fatigue science is being understood and addressed in relation to operating in a 24/7 working environment. The plan needs to identify all potential foreseeable hazards related to fatigue and the appropriate controls to manage this. Examples include how schedules are being allocated taking into consideration the hours the crew members are actually working and ensuring they are fit for duty and have sufficient sleep prior to the commence of the shift.

Is there any resources the assist with managing fatigue taking into account different operational profiles of vessels and crew?

A range of resources are available on [AMSA's website](#) for operators and vessel types include best practice guidance, checklists and scenarios.

When employing a new crew member, is there a pre-employment testing company that tests for sleep apnoea?

Pre-employment health assessments can be arranged through occupational health providers that specialise in sleep apnea testing.

A self-administered risk assessment seems like a weak fatigue management tool. We have been told for years that hours of work and rest are critical on RAVs yet there are no limits on hours of work for DCV seafarers. Is the health and safety of domestic seafarers less important?

The goal is the same across all sectors, that is to provide a healthy and safe working environment for seafarers. While there are different regulatory requirements, such as minimum hours of work and rest for the international fleet, it doesn't mean that fatigue risks are not being managed in the domestic sector.

In the DCV sector a risk-based approach allows flexibility while still focusing on managing fatigue. The owner and operator are provided with more flexibility and opportunities to develop a fatigue risk management plan taking into their respective operations as there is no one size fit all.

What if a vessel has a fatigue risk management plan that is outdated due to the change in operations. Should the FMP be updated every time there is a change in operations? Are there any rules under AMSA that enforces this?

Under MO504, there is a requirement to review the vessel's safety management system due to change in operations including when the risk changes or new risks are identified. This means during the review process you may be required to update your safety management system and revisit your fatigue risk management plan and ensure the existing control measures are still effective or whether new control measures need to be introduced.

Will AMSA be inspecting our plans and monitoring compliance?



The fatigue risk management plan forms part of your SMS. During an inspection you may be asked to provide a copy of your plan for review.

Do I need to consult with the master and crew when developing my fatigue plan?

The plan is a component of the vessel's risk assessment and must be developed and reviewed in consultation with the master and crew. How you engage with masters and crew will depend on a number of factors such as the size of your operation and workforce, multiple vessel locations and the diversity of operations you undertake.

What does AMSA classify as 'work' and 'rest'?

'Rest' means a period of time when a person is free of all duties and functions, except in the case of an emergency.

The term 'work' is not defined in the national law or the model WHS laws. It is reasonable to take the ordinary meaning of the word to mean carrying out activities for a business or undertaking.

Can energy-producing medications or supplements, such as NoDoz, reverse the effects of fatigue?

You should discuss any use of medications or supplements with your relevant health specialist. Our bodies are different in terms how we handle medications and may cause unwanted side effects. When considering using medications for the management of fatigue, this needs to be done with caution because they can have other side effects, such as impacting sleep patterns.

How are operators expected to handle fatigue risk when crew shortages limit options for rostering or relief?

This should be included as a risk factor in your fatigue risk management plan. This will ensure you consider the appropriate controls you may need to put in place to manage this. You need to ensure that your crew are fit for duty and have sufficient sleep prior to commencing their shifts, provide them with breaks during work operations including the need for a proper environment to allow them to appropriately rest and recover.

At all times, you also need to ensure that you don't operate below the minimum number of crew, and qualifications held, as detailed in your appropriate crewing determination.

Why is AMSA continuing to approve 2 watchkeepers for voyages, in spite of many of the vessels clearly able to carry more crew. This leads to 12 hour watchkeeping with only 1 person the bridge. How will AMSA protect seafarers from losing their position for refusing to sail? Most of the delivery voyages internationally on smaller Australian flagged voyages are still being approved with 2 watchkeepers. I believe that 12 days of 12hr watches, broken into 8/ 4 watch rotation.

Under MO504, it sets out the minimum requirement by vessel length. However, the requirement is also to ensure that the owners operators put together an appropriate crewing assessment, which includes the number of qualified crew to manage their operations safely and must consider fatigue.



For regulated Australian vessels, crewing assessments consider several factors, including the vessel's general arrangement, voyage duration, emergency arrangements, and watchkeeping requirements. These assessments must comply with STCW and the hours-of-rest provisions in Marine Order 28. While some vessels may have the capacity to carry additional crew, crewing levels must be based on regulatory and operational requirements rather than the number of available berths.

For DCVs, fatigue and appropriate watchkeeping arrangements must be addressed through an appropriate crewing assessment under MO504.

In all cases, operators remain responsible for ensuring fatigue is effectively managed and that required hours of rest can be met. Seafarers should raise fatigue-related safety concerns through the reporting processes in their company's Safety Management System or report a [marine safety concern](#) directly with AMSA. Seafarers should not face negative consequences for reporting legitimate safety issues.

How can AMSA and operators better support a positive safety culture that encourages crew to report fatigue, while ensuring they feel safe to raise concerns without fear of job security impacts or being perceived as unreliable?

Safety culture first and foremost comes from the owner and operator. It's important that vessel owners, operators and masters instil a strong safety culture where crew members feel comfortable discussing and raising concerns about fatigue, and any other safety issue. Crew should be able to discuss any concerns with the designated person and during any review of the safety management system.

The other approach is if the crew has serious concerns, they can report directly to AMSA. However, the best approach is for the owner and operators to set the right scene and establish a feedback loop that allows them to better understand and manage fatigue risks more effectively.

Situations may arise where some crew may have had adequate opportunity for sleep but for some reason may still not have gotten adequate quality sleep. It's important to give crew members the opportunity to report back when they have not been able to get enough sleep, or feel at risk of making fatigue-related errors, without repercussions.

How should fatigue be managed in emergency situations?

Fatigue affects individuals regardless of situations and can negatively impact your control of incidents, increasing opportunities for injuries which can be deadly in emergency situations.

When developing your fatigue risk management plan, it is important to identify all reasonably foreseeable fatigue hazards and associated risks including emergency preparedness.

Emergency preparedness is an important requirement under MO504. Fatigue hazards and how emergencies impact crew fatigue need to be considered and included in your risk assessment.

What are your thoughts on bio mathematical algorithms and modelling such as InterDynamics and FAID?



Planning work schedules based on fatigue science and operational requirements allows predictive identification of fatigue hazards. In turn assist in allocating adequate rest periods that provide sufficient opportunity for sleep.

Biomathematical modelling tools also known as fatigue predictive software are useful tools that can be used to predict fatigue levels for specific operations and manage the risk of fatigue.

It is important to use these tools in conjunction with other operational data. Do not use them in isolation or be the main driver in work scheduling decisions, as they are not sufficient to determine the full extent of fatigue related risks. So, know their limitations – but good to use as part of the planning process.

There are other more simple tools that can be used to support work scheduling such as fatigue risk assessment tools – AMSA has developed such a simple tool which is available on our website.

What are AMSA doing to ensure companies comply with the NSCV Part C, Section 1 Chapter 4, Table 4; as companies are known to expect crew to have their breaks onboard vessels (AL<12) & (AL12-36) that do not arrive at shore based facilities for the appropriate length of time to allow crew to have their breaks ashore, while the vessels do not meet the requirements of Table 4 Application of provisions for accommodation spaces for their true category?

Having a healthy vessel environment is an important consideration in relation to fatigue risk management. This includes ensuring the crew have adequate facilities to rest and recover while at sea. If it's a longer period of time, they would need somewhere where to have a place where it's conducive for sleep. So that's an important consideration in relation to the control measures that need to be put in place to manage the risk of fatigue.

It is a condition of a certificate of survey that a vessel continues to meet the standards that apply to it. It is an offence for an owner or master to operate a vessel in breach of a condition of a certificate of survey under s45 and s46 of the National Law.

Vessels certified to the NSCV standards are assigned an accommodation level as part of an application for a certificate of survey. The accommodation level (AL) limits the period of time during which a person on board the vessel does not have access to shore-based sleeping facilities. The USL Code standard for crew accommodation applies to existing vessels and transitional vessels where the voyage duration is 36 hours or more. Both the NSCV and USL Code standards contain certain crew accommodation requirements depending on the voyage duration. These requirements align closely to the Maritime Labour Convention.

If the vessel is operated beyond the voyage duration for which it has been certified, the owner and master would be in breach of National Law. An AMSA form 355 may be lodged to report a safety concern, including operations where it is suspected that the voyage duration exceeds that for which the vessel was certified.