Australian Government
Australian Maritime Safety Authority

AMSA webinar - Q & A

Fatigue risk management

On 19 February 2025, the Australian Maritime Safety Authority (AMSA) hosted a webinar for domestic commercial vessel (DCV) owner/operators and maritime professionals, on fatigue risk management.

The webinar included the following topics:

- **Risk assessment**: Owners of Class 1, 2, and 3 vessels must identify and assess the risk of fatigue on the master and crew as part of their vessel's risk assessment. **Note:** Class 4 vessels are not affected.

- **Documentation**: Owners of Class 1, 2, and 3 vessels must document how these risks will be managed. Fatigue risk management plans can be tailored to the size and complexity of the operation, offering flexibility for different vessel types and business needs.

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

Does AMSA have a downloadable fatigue risk management plan and operation-specific examples?

AMSA has provided example risk assessments on our website. The examples refer to Class 3 vessels but can be relevant across all vessel classes.

When developing your fatigue risk management plan, don't rely solely on the examples. Consider the risks and controls that are best suited to your crew and operation.

These resources can also help you develop your fatigue risk management plan:

- Fatigue management: guidance on how to meet the new MO504 requirements
- Fatigue risk management checklist
- Managing crew fatigue

How large does my fatigue plan need to be?

There is no set size. Marine Order 504 allows for flexibility to develop the plan that works best for your operation.

When developing your plan, you need to be satisfied that you have factored in all reasonable risks and controls, for example:

- education on causes and consequences of fatigue including identifying signs and symptoms of fatigue
- providing adequate sleep opportunities
- limiting the number of hours crew work at night
- providing rest breaks.

Who needs a fatigue risk management plan? Are there any exemptions?

Hire and drive (Class 4) vessels don't need a fatigue management plan. All other vessel types and classes need to develop a fatigue risk management plan.

You can develop a plan that works best for your crew, vessel type and operation.

When should I develop a fatigue management plan, and how should I do it?

The requirement to manage the risks of fatigue comes into effect on 1 June 2025.

If you have already considered fatigue risks in your safety management system (SMS), review them to ensure they're still suitable. Make sure you update your risk assessment, if you haven't already done so.

These resources can also help you develop your fatigue risk management plan:

- Fatigue management: guidance on how to meet the new MO504 requirements
- Fatigue risk management checklist
- Managing crew fatigue

If you use an SMS app, check that it includes the ability to add a fatigue risk management plan. If not, speak with your app provider for further information on how best to include one.

How are emergency service volunteers supposed to manage their hours of work/rest? We often go to an emergency after our day job and in the evenings.

Emergency service volunteer organisations need to consider how best to manage the risks of fatigue through a plan, in the same way as other operators.

It is crucial that volunteers provide accurate information on their current fatigue levels to the vessel owner/shift supervisor.

This could include information on:

- how well they slept the night before

- how long they have been awake
- what they have been doing and for how long (manual/mental work etc)
- their general health and wellbeing.

Vessel owners/shift supervisors should then consider this under their fatigue plan and policies, when determining if a volunteer is fit for tasks/functions.

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.

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 any work, whether for reward or otherwise.

How is fatigue managed when operating with minimum crewing under MO504?

Where the master and crew are operating under minimum crewing, they are required to be given at least 10 hours rest in each 24-hour period.

In this situation, ensuring they have at least 10 hours rest would form part of your fatigue risk management plan.

Where you can't provide a minimum of 10 hours rest* under minimum crewing, you would need to undertake an appropriate crewing determination.

*Rest means when a person is free of all duties and functions, except in an emergency.

Why doesn't AMSA align the minimum rest hours in the domestic maritime industry with international standards? Specifically, 10-hour minimum break in each 24-hour period?

Currently, MO504 requires masters and crew to have at least 10-hours rest in each 24-hour period, when a vessel is operating with minimum crewing.

In 2024, AMSA consulted with industry on a proposal to expand this rest requirement to all masters and crew working on DCVs, including when a vessel is operating above minimum crewing levels.

The feedback that AMSA received on the proposal was mixed. There was strong support from some sectors and strong opposition from others. Those that opposed said that a prescriptive approach to rest would be impractical for some sectors. They said they needed operational flexibility and the ability to respond quickly to safety concerns.

Fatigue management provides for a broader consideration of risks. In addition to the hours of work and rest, operators must consider:

- environmental factors
- night work
- suitability of the sleeping environment (if relevant).

A fatigue risk management approach is a better outcome for such a diverse industry, rather than a one-size-fits-all approach.

What are AMSA's top tips for managing fatigue?

Tip 1: Owners/operators must provide effective support for managing the risks of fatigue.

Effective fatigue risk management starts with the owner/operator providing strong support. Success relies on leadership commitment to prioritising crew wellbeing and safety.

Tip 2: Educate your masters and crew about the causes and consequences of fatigue.

This includes understanding what causes fatigue and what can happen when a person is fatigued. Having a shared awareness of the causes and consequences will ensure that you and your crew are better placed to deal with fatigue and lessen its effects.

Tip 3: Masters and crew should develop good sleeping habits so that they go to work refreshed.

This could include:

- having consistent sleep times
- avoiding stimulating activities such as exercise or screen time just before going to sleep
- sleeping in a dark, quiet and cool environment.

This should form part of your overall training for crew ,and become part of your fatigue risk management plan.