Safety Management Systems

Sixteen years of writing and maintaining the systems that keep commercial yachts safe and compliant

Subject	Safety Management Systems written and maintained by Australian Superyachts
Period	2010 to today
Systems written	More than 20 vessel-specific systems, many revised several times
Vessels include	Ghost, Oscar, Patriot 1, Ghost II, Oneworld and Sirenuse, from day charter vessels to 37 m commercial superyachts
Regulators	NSW Maritime and the state authorities, NSW Roads and Maritime Services as AMSA's delegate, and AMSA

Why it matters

A Safety Management System is the operating rulebook of a commercial vessel: who is responsible for what, how the vessel is run, and exactly what the crew do when something goes wrong. It is a legal requirement, it is audited, and it has to match the vessel as she actually is, her equipment, her crew, her operations and her survey. When any of those change, or the law changes, the system has to change with them.

Captain Richard Morris began writing Safety Management Systems when they became mandatory on board commercial vessels around 2010. Since then Australian Superyachts has written more than 20, for vessels from day charter boats to 37 metre commercial superyachts, and has kept many of them current through new owners, new operations and three generations of legislation.

The journey

2010: the first system on board

When the NSW requirement for Safety Management Systems on commercial vessels came in, there was no off-the-shelf answer for a charter superyacht. Richard wrote the first ASY system for M/Y Ghost, a Warren 87 charter yacht, between late 2010 and early 2011. It set the pattern every ASY system has followed since: Folder 1 for the emergency procedures, stability information, certificates and survey; Folder 2 for the operating manual, with policies, lines of responsibility, operating procedures, fatigue management, crew induction and a risk register; and laminated Emergency and Operational Procedures flip charts for the bridge.

2011 to 2015: from one vessel to many

More vessels followed, including MV Oscar in 2011 and 2012 and M/Y Patriot 1 in 2014, along with day charter vessels and tenders in their own survey. On 1 July 2013 the National System for

Domestic Commercial Vessel Safety made AMSA the single national regulator and put a legal duty on every owner to implement and maintain a Safety Management System. Each ASY system was brought across to the new national framework.

2016 to 2018: writing the system before the yacht arrives

For the new build commercial superyachts Ghost II (2016) and Oneworld (2018), the Safety Management System was written while the yachts were still being built overseas, so that it was ready to be audited the moment they arrived. For Ghost II, ASY specified the safety and operating procedures, trained the crew in them through repeated drills, and took the vessel through its audit with the regulator's surveyors, including drill scenarios set on the day. The system was approved, and the regulator's survey team leader wanted to feature the audit in its newsletter.

2019 to 2024: Marine Order 504

Marine Order 504 set out in detail what a Safety Management System must contain. ASY reviewed and reissued its systems against it, adding the procedures AMSA's inspectors now looked for, from a person missing on board to radio watchkeeping, and writing the conditions of any exemption directly into the system. After an AMSA inspection in October 2022, the inspector's finding on one ASY system was simple: it "meets the intent of MO504".

2025 to today: keeping pace with change

Marine Order 504 was amended again in June 2025. ASY's current revisions add a document amendment record, assembly station, passage planning and loss of propulsion procedures, and a vessel modification record, with the legislation section rebuilt around the current National Law and Marine Orders. Ghost, the first ASY system, is now on Version 4.0, sixteen years after Version 1.

The problems we solved

1. A system that matches the vessel, not a template

The problem: Generic templates are easy to buy and easy to fail an audit with, because they describe a vessel that does not exist.

What we did: Every ASY system is written for its vessel: her layout, equipment, crew numbers, survey class and the way she actually operates. Drafts go to the master page by page before the final is printed, bound and placed on board.

The result: Systems that crews use, and that pass audit.

2. A system rejected by AMSA

The problem: An owner of a 72 foot charter yacht had submitted a Safety Management System that AMSA assessed against Marine Order 504 and found to have several areas not included and large sections missing.

What we did: Australian Superyachts was brought in the same day, worked through AMSA's assessment line by line, and rewrote the system to meet it.

The result: AMSA approved the revised system in May 2024.

3. Keeping a system current for sixteen years

The problem: A Safety Management System goes out of date every time a vessel changes owner, adds a tender, changes her survey, or the law changes.

What we did: We keep the master documents for every system we write and revise them whenever the vessel or the law changes, with each version numbered and the superseded copies removed from the vessel.

The result: Systems first written for the state regime in 2010 are compliant with the 2025 Marine Orders today.

Also delivered: Emergency and Operational Procedures flip charts, sewage and garbage management plans, garage and tender risk assessments, stand-alone systems for tenders in their own survey, custom logbooks, and crew drill and induction records.

Timeline

When	Where and what
2010 to 2011	First ASY Safety Management System, M/Y Ghost (Warren 87)
2011 to 2015	Systems for further charter vessels; National System begins 1 July 2013
2016	Ghost II system written during the build and approved at audit
2018	Oneworld system delivered with the yacht
2022	Systems reissued under Marine Order 504; AMSA inspection finds an ASY system meets the intent of MO504
2024	A rejected system rewritten and approved by AMSA
2025 to 2026	Revisions for the amended Marine Order 504; Ghost reaches Version 4.0

In their words

> *"The SMS meets the intent of MO504."*
>
> Marine Inspector, AMSA, October 2022

> *"Thank you for your work on the SMS for Ghost. I will action the necessary changes onboard. Looking forward to seeing the new version."*
>
> Master, M/Y Ghost, October 2026

What this shows

A Safety Management System written by a Master Mariner and AMSA accredited surveyor, who has sat on both sides of the audit, is a different document from a template. We have been writing them since the first day they were required, and we are still maintaining the first one we wrote.