What is the ACA-Fatigue safety case, and what do I need to include?

Fatigue and work diary - checked 7 Nov 2026

The safety case is your written case to the NHVR for the hours you want. In your ACA-Fatigue application you answer seven "Fatigue Module Details" questions. They show you genuinely need alternative compliance hours and have the systems to manage the extra fatigue risk. NHVAS BFM had nothing like it - you simply took the set BFM hours.

What the safety case is for

Under ACA-Fatigue, the NHVR works with you to set alternative compliance hours (ACH) for your drivers instead of standard hours. Before it approves them, the NHVR must be satisfied that:

- your hours give a safe balance between work, rest, risk management and fatigue countermeasures
- your hours stay within the outer limits in the law
- safety will be at least as good as it would be under standard hours
- your safety management system meets the SMS Standard (through General Safety Accreditation)

The safety case is how you make that case. It sits alongside your proposed table of hours and your fatigue risk management system, which you also submit.

How it works

- The safety case is the "Fatigue Module Details" section of your ACA-Fatigue application in NHVR Go. You complete it as part of your application.
- Your auditor doesn't review the safety case - the NHVR assesses it.
- You need it whether you pick an NHVR template table of hours or put forward your own.
- You risk-assess your hours using the NHVR's Risk Classification System matrix, and the NHVR uses the same matrix when it assesses them, case by case. Your safety case should show how your controls reduce the risks the matrix picks up.
- Your fatigue controls should be detailed in your safety management system, not kept as a separate document. The safety case should point to them.
- Most HVA applications are assessed within 14 days, but ACA-Fatigue applications can take longer - allow for this.

The seven questions - and what to include

Question What to include

1. What transport activities does your business do, including non-transport work your drivers are responsible for? Freight types, routes, distances and shift patterns. Loading, unloading, tarping, yard or workshop jobs your drivers also do.

2. What is your safety record, including any enforceable undertakings, external investigations or prosecutions? Incidents, notifiable occurrences, work diary breaches and roadside outcomes - and what you changed as a result. Be honest. The NHVR can check.

3. What is your heavy vehicle fleet? How many vehicles and what types - prime movers, rigids, B-doubles, sleeper cabs.

4. Do you use fatigue-related technology? EWDs, fatigue and distraction technology or telematics - and what you do when they raise an alert. Technology isn't required - if you have none, explain how you monitor hours instead.

5. Who is involved in your fatigue management system? Who schedules, who reviews work diaries, who checks drivers are fit for duty, and who is responsible for the accreditation. Their fatigue training.

6. How do you manage fatigue now? Rostering rules, journey planning, fit-for-duty checks, work diary reviews, what happens after a breach, rest facilities and how you investigate incidents.

7. Why do you need alternative compliance hours instead of standard hours? The real operational reason, such as distances between safe rest places, customer delivery windows or seasonal peaks. Show how your hours keep drivers at least as safe as standard hours.

More is better

> Give enough detail to show a genuine need for the hours and the systems to manage the extra risk. More information is always better than not enough.

When higher-risk hours need more

If your hours score as higher risk - for example more than two high risks, or more than three medium risks - the Ministerial Guidelines require a fuller safety case.

- NHVR template tables 2, 3 and 4 (the longer AFM-style hours) have an elevated risk profile.
- Extra features such as two-up driving, split rest or exemption conditions can raise the risk profile too.
- Higher-risk applications may be sent to an independent specialist for review. They can take longer and may cost more in fees.

Make your hours easier to approve

The NHVR uses these principles when it assesses hours. The closer your table follows them, the stronger your case:

- Keep continuous work periods as short as possible.
- Schedule driving breaks often.
- Allow enough rest time for drivers to sleep, and give them the best chance to sleep at night.
- Avoid shifts ending between midnight and 6 am.

- Keep shifts as short as you reasonably can.
- Plan reset breaks of at least 30 hours, including two night periods, between blocks of work.

How this differs from NHVAS fatigue accreditation

What NHVAS BFM NHVAS AFM ACA Fatigue

Hours Set BFM hours Your own approved hours NHVR template or your own hours, within outer limits

Case for your hours None - you took the BFM hours Yes - a safety case, with a fatigue risk assessment of your hours Yes - safety case for every application, including templates

Base accreditation needed No No Yes - General Safety Accreditation

Audited against BFM standards AFM standards Your whole SMS, plus the fatigue requirements in Schedule 1 of the SMS Standard 2026

New applications Closed Closed Open

If you came from AFM, the safety case will feel familiar - AFM applications also started with one. The biggest change is for BFM operators. Even if you choose the BFM-equivalent template (Table 1), you now need to explain why you need the hours and how you manage the risk - and your whole business is audited, not just fatigue. Table 1 also raises the 14-day reset break from 24 to 30 hours.

Once you're approved

- Your hours are listed on your ACA-Fatigue accreditation certificate.
- Drivers carry the certificate, a signed letter confirming they work under your accreditation, and a work diary - every shift, local work included.
- Drivers record your accreditation number in their work diary.

General information, not legal advice.

Sources

NHVR - Alternative Compliance Accreditation - Fatigue - https://www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management/alternative-compliance-accreditation-aca-fatigue

Ministerial Guidelines for Heavy Vehicle Accreditation - May 2026 - https://www.ntc.gov.au/sites/default/files/assets/files/Ministerial%20Guidelines%20for%20heavy%20vehicle%20accreditation%20-%20May%202026.pdf

NHVR - ACA-Fatigue templated tables of hours - https://www.nhvr.gov.au/files/media/document/878/202609-1755-aca-f-templated-table-of-hours-information-sheet.pdf