



RIS Ref: DAF908  
File Ref: DOC18/1866

9 October 2018

[REDACTED]  
Senior Fisheries Manager  
Department of Agriculture and Fisheries  
41 George Street  
BRISBANE QLD 4000

Dear [REDACTED]

**Amendment to the *Fisheries Regulation 2008***

Thank you for your enquiry of 20 September 2018, and further information provided 4 and 5 October 2018, regarding the proposed amendments to the *Fisheries Regulation 2008* (the Regulation).

The Department of Agriculture and Fisheries (the Department) proposes to amend the Regulation to:

- standardise provisions relating to vessel tracking equipment installation and maintenance
- list those fisheries required to have vessel tracking equipment installed and operational.

The Department notes that net, line and crab vessels will be required to have installed a tracking unit from 1 January 2019, with a view to requiring all commercial fishing vessels to be fitted with the equipment by 2020.

The Department advises that:

- some commercial fishers operate several vessels and/or tender vessels as part of their fishing operations and so they will be required to maintain several vessel tracking units
- fishers will be permitted to transfer units between vessels
- fishers will be able to apply for a rebate through the Queensland Rural and Industry Development Authority (QRIDA) to cover the majority, in some cases all, of the cost of purchasing and installing tracking units. Up to \$3 million has been set aside to fund the rebate, which the Department advises is adequate to provide for all the tracking units required
- once installed commercial fishers will be required to pay for the ongoing polling (reporting) costs associated with the vessel tracking
- installation of vessel tracking units is already required in vessels operating in a number of Queensland's commercial fisheries (e.g. trawl, sea cucumber).

The Department notes consultation on mandatory vessel tracking that has already been undertaken.

**Consultation on the Green Paper on Fisheries Management Reform in Queensland**

In July 2016 the Government released the *Green Paper on Fisheries Management Reform in Queensland* (the Green Paper) for public consultation. The Green Paper outlined proposals to progressively adopt new technologies, including electronic vessel tracking, to help ensure the sustainability of Queensland's fisheries. The *Fisheries green paper consultation feedback and results June 2017* noted that 'Feedback generally



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supported the adoption of new compliance technologies, including vessel tracking. Concerns raised about vessel tracking related to privacy issues, costs to fishers and practicality'.

Feedback on the green paper helped shape the *Queensland Sustainable Fisheries Strategy 2017-2027* (the Strategy). The Strategy outlines 33 actions including the requirement to install electronic vessel tracking on all commercial boats by 2020, with a priority to install tracking on net, line and crab boats by 2018.

#### **Consultation on the Vessel Tracking Policy and Guidelines**

In January 2018 the Queensland Government released, for public consultation, a draft vessel tracking policy and guideline to support the implementation of the Strategy. The Department advises that during this consultation stakeholders were made aware:

- of the QRIDA rebate for the cost of purchasing and installing tracking units (\$200 to \$900 per unit)
- they would be required to pay all the ongoing reporting costs (approximately \$30 to \$40 per month).

The *Vessel Tracking Consultation Report Feedback on draft policy and guidelines*, which was released in January 2018, noted strong concern amongst industry stakeholders regarding the cost of vessel tracking and the confidentiality of vessel tracking data. Once finalised the final versions of the vessel tracking policy, guidelines and installation and maintenance standard, including updated ongoing reporting and unit purchase costs, were mailed to all commercial fishing boat licensees.

#### **Assessment**

The Queensland Productivity Commission (the Commission) considers the Department's proposal will have adverse impacts on commercial fishers and notes the strong concerns of the commercial fishing industry, raised during the public consultations, related to the ongoing reporting costs.

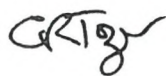
Since stakeholders have been given the opportunity to comment on the proposed amendments, including through public consultation, the Commission considers further analysis and consultation in the form of a Regulatory Impact Statement would not be beneficial at this stage.

However, given stakeholders concerns and following best practice regulation principles the Department should consider undertaking further analysis of the adverse consequences for commercial fishers including an assessment of fishers' ability to pay (especially small scale fishers) and the industry's capacity to pass on costs. This analysis could be presented directly to relevant stakeholders for comment.

It will be important that decision makers are presented with all the available evidence on the impacts of the proposal and the strong concerns of adversely affected stakeholders before a final decision is made on the regulatory amendments.

Please contact Dominic O'Neill, Senior Analyst, on [REDACTED] if you require any additional information or guidance in relation to the above comments or the Guidelines in general.

Yours sincerely



**Christine Tozer**  
Acting Team Leader

## Carrie Haines

---

**From:** QPC Website  
**Sent:** Thursday, 20 September 2018 7:05 AM  
**To:** obpr  
**Subject:** New submission from OBPR RIA Assessment - New

**Categories:** Actioned

### Name

[REDACTED]

### Role title

Senior Fisheries Manager

### Email

[REDACTED]

### Phone

[REDACTED]

### Organisation and address details

Department of Agriculture and Fisheries  
GPO Box 46  
Brisbane, QLD 4000  
Australia  
[Map It](#)

### Assessment type

Preliminary Impact Assessment

### Lodgement notes

Good morning

In June 2017, the Queensland Government released the Sustainable Fisheries Strategy 2017-2027 (the Strategy) outlining its vision for the future management of Queensland's fisheries resources. The Strategy outlined 10 key areas of reform and a number of actions, which once implemented will align Queensland's fisheries management framework with current best practice principles.

One of the key initiatives of the Strategy relates to vessel tracking requirements in Queensland's fisheries, specifically, Action 9.6 states: "Require installation of vessel monitoring systems (VMS) on all commercial boats by 2020, with a priority to install VMS on net, line and crab boats by 2018".

The installation and maintenance of vessel tracking equipment (formerly referred to as vessel monitoring systems or VMS) is currently a requirement in a number of Queensland's commercial fisheries. To support the implementation of the Government's policy on vessel tracking as outlined in the Strategy, amendments to the Fisheries Regulation 2008 (the Fisheries Regulation) will be required. These amendments will:

- o Standardise provisions relating to vessel tracking equipment installation and maintenance; and
- o List those fisheries required to have vessel tracking equipment installed and operational.

The attached preliminary impact assessment has been completed for consideration by the Office of Best Practice Regulation.

Should further information be required please do not hesitate to contact me on the details provided. It would be greatly appreciated if you could email me confirming that the PIA has been received.

Regards

[REDACTED]

### Upload Preliminary Impact Assessment

- [PIA-VMS.doc](#)



# Preliminary Impact Assessment

## Template

A Preliminary Impact Assessment (PIA) explains the need for a regulatory proposal, and as well as its likely effects. The information presented in a PIA is intended to inform decision makers, including ministers and the Cabinet, about:

- (a) the expected costs and benefits of a regulatory proposal
- (b) how the proposal compares to other potential options
- (c) whether the proposal would benefit from additional analysis and community consultation.

Where a PIA demonstrates that the regulatory proposal is likely to result in significant adverse impacts on a section or sections of the community, a Regulatory Impact Statement (RIS) should be prepared in consultation with the Office of Best Practice Regulation (OBPR).

Please refer to Section 2.5 of the [Queensland Government Guide to Better Regulation](#) for further guidance on completing a PIA.

### Details of the proposal

Name of the Proposal:	Vessel tracking	
Regulation(s) proposed to be introduced or amended:	Act, Regulation, Quasi-regulation	Fisheries Regulation 2008
Department:	Department of Agriculture and Fisheries	
Contact officer:	Name and title	[REDACTED]
	Phone Number	[REDACTED]
	Email	[REDACTED]

### Summary of the proposal *(complete this section after completing the rest of the PIA)*

<b>Briefly describe the proposal in a clear and concise statement:</b>
<ul style="list-style-type: none"><li>• In June 2017, the Queensland Government released the <i>Sustainable Fisheries Strategy 2017-2027</i> (the Strategy) outlining its vision for the future management of Queensland's fisheries resources. The Strategy outlined 10 key areas of reform and a number of actions, which once implemented will align Queensland's fisheries management framework with current best practice principles.</li><li>• One of the key initiatives of the Strategy relates to vessel tracking requirements in Queensland's fisheries, specifically, Action 9.6 states: "Require installation of vessel monitoring systems (VMS) on all commercial boats by 2020, with a priority to install VMS on net, line and crab boats by 2018".</li><li>• The installation and maintenance of vessel tracking equipment (formerly referred to as vessel monitoring systems or VMS) is currently a requirement in a number of Queensland's commercial fisheries. To support the implementation of the Government's policy on vessel tracking as outlined</li></ul>

in the Strategy, amendments to the *Fisheries Regulation 2008* (the Fisheries Regulation) will be required. These amendments will:

- Standardise provisions relating to vessel tracking equipment installation and maintenance; and
- List those fisheries required to have vessel tracking equipment installed and operational.

## Section 1 – Identification of the problem

Briefly identify the problem. This section should provide:

- As outlined in the Strategy, the Government has committed to requiring that vessel tracking equipment be fitted to all commercial fishing vessels in the Queensland commercial net, line and crab fisheries by the end of 2018, with a view to requiring all commercial fishing vessels to be fitted with vessel tracking equipment by 2020.
- The Fisheries Regulation and the *Fisheries (East Coast Trawl) Management Plan 2010* currently require that vessel tracking equipment be fitted to vessels operating in a number of Queensland's commercial fisheries (e.g. trawl, sea cucumber). The current provisions are however fishery specific.
- To support the broader rollout of vessel tracking, it is proposed that the Fisheries Regulation be amended to standardise vessel tracking equipment installation and maintenance requirements across all fisheries. The fisheries to which these requirements will apply will then be listed in the Fisheries Regulation.
- There is currently 884 primary commercial fishing boat licences in Queensland's net, line and crab fisheries. Primary vessels associated with these licences will be required to have installed a vessel tracking unit from 1 January 2019. It should be noted that in addition to their primary commercial fishing vessels, some commercial fishers use tender vessels as part of their fishing operations. This is particularly the case in Queensland's line fisheries. Fishers using tender vessels as part of their fishing operations will also be required to install vessel tracking units on these support vessels.

## Section 2 – Objectives of government action

Briefly identify clear and specific objectives of government action. This section should:

- Deliver upon the commitments made by the Queensland Government through the Strategy relating to the roll out of vessel tracking equipment, specifically:
  - Action 9.6 states: "Require installation of vessel monitoring systems (VMS) on all commercial boats by 2020, with a priority to install VMS on net, line and crab boats by 2018".

## Section 3 – Consideration of options

Briefly identify feasible options to address the problem by outlining:

- No alternate options to this proposal have been considered. The proposed amendments to the *Fisheries Regulation 2008* are necessary to give effect to Government policy.

## Section 4 – Impact analysis of the options

Provide an analysis of the impacts of options identified. These impacts should be quantified where possible. If the impacts are not able to be quantified in terms of dollars, then they need to be assessed and discussed qualitatively. For each option, this section must include:

- Vessel tracking is used around the world by fisheries management agencies to carry out real-time monitoring of the commercial fishing fleets. The data collected from vessel tracking is used to:
  - monitor quota in near real time (e.g. deducting fishing days from individual's quota);
  - monitor compliance with area and seasonal closures (including marine park zones);
  - provide intelligence and evidence for investigations;
  - help validate logbook data on where and when fishing occurred;
  - provide fishing effort data used in stock assessments to estimate the biomass of a fish stock;
  - help inform fishery management changes that may be needed.
- A number of Queensland's commercial fisheries have been required to have vessel tracking equipment installed for a number of years. This equipment has been particularly effective in ensuring compliance with spatial closures and closed seasons.
- As the benefits that vessel tracking provides from a fisheries management perspective are significant the Queensland Government through the Strategy has committed to requiring all Queensland commercial fishing vessels to be installed with vessel tracking equipment by 2020, with vessel tracking being implemented in the priority fisheries (net, line and crab) by 2018.
- To offset the costs of delivering upon this commitment, with assistance from the Great Barrier Reef Marine Park Authority, the government has set aside up to \$3 million to help fishers pay for the purchase and installation costs associated with implementing vessel tracking. Fishers will be able to apply for a rebate through the Queensland Rural and Industry Development Authority (QRIDA).
- Once installed commercial fishers will be required to pay for the ongoing polling (reporting) costs associated with the vessel tracking. These costs are around \$30-40/month.
- Many commercial fishers operate several vessels as part of their fishing operations. This will mean some fishers will be required to maintain several vessel tracking units. To minimise the potential costs to industry, DAF will be allowing commercial fishers to move vessel tracking units between their respective fishing vessels.

## Section 5 – Consultation

Provide a list of key stakeholders and whether they have been consulted. This should include a summary of:

### Queensland community

- In July 2016, the Government released the Green Paper on Fisheries Reform in Queensland (the Green Paper) for public consultation. The Green Paper outlined a proposed reform agenda that was intended to align Queensland's fisheries management framework with best practice principles. The Green Paper outlined a proposal to; "Progressively adopt new technologies including electronic vessel tracking in Queensland commercial fisheries with roll out based on risk".

- The public consultation process on the Green Paper generated more than 11,800 submissions. The feedback received generally supported the adoption of new compliance technologies, including vessel tracking. Concerns raised about vessel tracking related to privacy issues, cost to fishers and practicality reform in the way we manage fisheries.
- Based upon the Green Paper and feedback received through public consultation, the Government developed the Strategy. The Strategy outlines 33 actions to be delivered across 10 reform areas with specific targets that we want to achieve by 2020 and 2027. Action 9.6 of the Strategy committed to: "Require installation of vessel monitoring systems (VMS) on all commercial boats by 2020, with a priority to install VMS on net, line and crab boats by 2018".

#### Commercial fishing sector

- Draft vessel tracking policy and guidelines were released for public consultation on 2 January 2018 and were open for consultation throughout January and February. Responses from meetings, emails, letters, surveys and phone calls in response to the draft policy and guidelines were consolidated and developed in to a consultation report, which is available on the DAF website at:

<https://publications.qld.gov.au/dataset/vessel-tracking/resource/a7aadf39-a3e2-47f7-80fe-33e470911376>.

- A number of changes were subsequently made to the draft policy and guidelines based upon the feedback received through this process. The final Vessel Tracking Policy and final Vessel Tracking Guideline have now been released and are available on the DAF website at:

Vessel Tracking Policy: <https://publications.qld.gov.au/dataset/vessel-tracking/resource/50f90160-d93c-49a4-83b2-863519ab87c5>

Vessel Tracking Guideline: <https://publications.qld.gov.au/dataset/vessel-tracking/resource/702f9e15-d3f1-48dd-919d-daea3bd20d76>

- The Guideline is specific to the net, line and crab fisheries, however the intention is that over time, all fisheries will operate under this guideline subject to regulatory amendments.

#### Fisheries Working Groups

- DAF sought feedback from the east coast inshore, crab and line fisheries working groups on the operational rules that would govern vessel tracking in these fisheries. The feedback from these groups was considered in finalising the Vessel Tracking Policy and Vessel Tracking Guideline.

#### Great Barrier Reef Marine Park Authority

- The Great Barrier Reef Marine Park Authority strongly supports the roll out of vessel tracking in the Queensland commercial fishing fleet, consistent with the Queensland Sustainable Fisheries Strategy 2017–2027. This support is reflected in the *Reef 2050 Long-Term Sustainability Plan*. The Government, with assistance from the Great Barrier Reef Marine Park Authority, has set aside up to \$3 million to help fishers pay for the purchase and installation costs associated with implementing vessel tracking. Fishers will be able to apply for a rebate through the QRIDA.

## Section 6 – Conclusion and recommended option

### Clearly state the preferred option:

- The commitments made by the Government through the Strategy, including those relating to vessel tracking have been developed following extensive public consultation process. DAF is of the opinion further consultation on this issue is unlikely to provide any additional benefits.

- The Government, with assistance from the Great Barrier Reef Marine Park Authority, has set aside up to \$3 million to help fishers pay for the purchase and installation costs associated with implementing vessel tracking in Queensland's fisheries. In combination with increased flexibility on the transfer of vessel tracking units between vessels, the practical and financial impacts upon affected commercial fishers have been minimised as far as practical.
- In light of the aforementioned consultation and the assistance being rendered to fishers to facilitate the implementation of vessel tracking in Queensland's fisheries; DAF is of the opinion that the proposed amendments to the *Fisheries Regulation 2008* qualify for an exclusion from further regulatory assessment under category (I) Regulatory proposals that have already undergone an extensive impact assessment process.
- DAF will continue to engage with commercial fishers over the next 6 months to ensure they are fully aware of their obligations under the new requirements.

Once this PIA has been completed, please lodge it with the OBPR for assessment at:  
<http://www.qpc.qld.gov.au/regulatory-review/lodge-ria-assessment/>

## Carrie Haines

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**From:** [REDACTED]  
**Sent:** Thursday, 4 October 2018 10:05 AM  
**To:** Dominic O'Neill  
**Subject:** RE: amendment to the Fisheries Regulation 2008

<https://www.daf.qld.gov.au/business-priorities/fisheries/sustainable-fisheries-strategy/vessel-tracking>

**From:** Dominic O'Neill [REDACTED]  
**Sent:** Thursday, 4 October 2018 9:23 AM  
**To:** [REDACTED]  
**Subject:** amendment to the Fisheries Regulation 2008

Hi [REDACTED]

Thanks very much for sending through the PIA re vessel tracking. This is a good PIA.

Could you please check my understanding and answer some questions. Thanks very much.

### Numbers of stakeholders affected by the proposal

- The PIA notes that currently there are 884 primary commercial fishing boat licences in Qld's net, line and crab fisheries. Under your proposal will all of these have to install electronic tracking units? Or will some of them already have them installed and if so approx. what proportion? As I understand it your proposal includes the requirement to install tracking units not just in net, line and crab fisheries but in all other fisheries as well. If this is correct then approx. how many additional stakeholders (beyond the 884) will need to install tracking units by 2020? I know some fisheries are already required to install tracking units.

### Size of impact on stakeholders

- As I understand it the costs faced by commercial fishers includes:
  - purchase and installation of tracking units \$200 (from DAF website <https://www.daf.qld.gov.au/our-organisation/news-and-updates/fisheries/news/vessel-tracking-policy-and-guidelines-released-for-feedback> ). Are you able to confirm that this is correct? How long do units last? How long before fishers need to replace the units?
  - ongoing polling (reporting) costs associated with vessel tracking (\$30-\$40 per month). Will there be a subsidy to help with this cost?
  - Are there any maintenance costs?
- Do some licence holders have numerous boats? I know operators will be able to transfer units but in reality will some operators need to install more than one tracking unit?

### Details of the subsidy provided by QRIDA

Is QRIDA paying all the purchase and installation costs? Is \$3m enough? Will any conditions apply?

- The PIA notes that \$3 million has been set aside to help subsidise the costs to industry, while I think I noticed \$2 million quoted on the DAF website. Could you please confirm the amount.

- Will the subsidy cover all the purchase and installation costs or just a proportion? Will it also cover other costs?
- Will stakeholders be able to choose amongst a range of tracking units from different suppliers?
- Will there be any other conditions?

### Consultation

I note there has been consultation on the green paper, the strategy and the vessel tracking policy/guidelines. I also note that in relation to the vessel tracking proposal stakeholders have raised concern regarding the costs, privacy issues and practicality (*Vessel Tracking Consultation Report - feedback on draft policy and guidelines June 2018*). Was the concern related to the ongoing reporting costs?

- Were fishers aware of the size of the cost of purchasing and installing tracking units and the size of the cost of ongoing reporting costs associated with vessel tracking (\$30 to \$40 per month) when they were consulted in one or more of the above?
- I note that some fisheries are already required to install tracking systems. Have affected fishers raised any issues related to cost or practicality?
- Was the proposal amended as a consequence of stakeholder feedback during the consultations? For example the introduction of the QRIDA subsidy, being able to transfer units etc?
- Did stakeholders comment on the robustness of the \$30 to \$40 per month figure? How was this figure calculated?

### Other questions

- Which section of the Regulation is being amended? Will the list be in a schedule of the Regulation?
- Does the Regulation currently contain a list of fisheries that need to install VMS?
- One of the amendments is to standardise provisions relating to vessel tracking equipment installation and maintenance. Currently are the provisions very different across fisheries?

Thanks very much for all your help.

Dom



Dominic O'Neill | Senior Analyst  
Queensland Productivity Commission



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## Carrie Haines

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**From:** [REDACTED]  
**Sent:** Thursday, 4 October 2018 10:13 AM  
**To:** Dominic O'Neill  
**Subject:** RE: amendment to the Fisheries Regulation 2008

### Vessel tracking (data security)

- Industry have expressed concerns over data security. Questions around:
  - o How fishing location information will be used?
  - o Will the information provided stored securely?
  - o What security measures to protect unlawful use?
- The Bill contains further protections for fisher's private data.
- Maximum penalty for unlawful use or disclosure of information = 50 penalty units (\$6,527.50). This includes public servants and third parties.
- This is in addition to requirements under the Information Privacy Act.

**From:** Dominic O'Neill [REDACTED]  
**Sent:** Thursday, 4 October 2018 9:23 AM  
**To:** [REDACTED]  
**Subject:** amendment to the Fisheries Regulation 2008

Hi [REDACTED]

Thanks very much for sending through the PIA re vessel tracking. This is a good PIA.

Could you please check my understanding and answer some questions. Thanks very much.

### Numbers of stakeholders affected by the proposal

- The PIA notes that currently there are 884 primary commercial fishing boat licences in Qld's net, line and crab fisheries. Under your proposal will all of these have to install electronic tracking units? Or will some of them already have them installed and if so approx. what proportion? As I understand it your proposal includes the requirement to install tracking units not just in net, line and crab fisheries but in all other fisheries as well. If this is correct then approx. how many additional stakeholders (beyond the 884) will need to install tracking units by 2020? I know some fisheries are already required to install tracking units.

### Size of impact on stakeholders

- As I understand it the costs faced by commercial fishers includes:
  - o purchase and installation of tracking units \$200 (from DAF website <https://www.daf.qld.gov.au/our-organisation/news-and-updates/fisheries/news/vessel-tracking-policy-and-guidelines-released-for-feedback> ). Are you able to confirm that this is correct? How long do units last? How long before fishers need to replace the units?
  - o ongoing polling (reporting) costs associated with vessel tracking (\$30-\$40 per month). Will there be a subsidy to help with this cost?
  - o Are there any maintenance costs?

- Do some licence holders have numerous boats? I know operators will be able to transfer units but in reality will some operators need to install more than one tracking unit?

#### **Details of the subsidy provided by QRIDA**

Is QRIDA paying all the purchase and installation costs? Is \$3m enough? Will any conditions apply?

- The PIA notes that \$3 million has been set aside to help subsidise the costs to industry, while I think I noticed \$2 million quoted on the DAF website. Could you please confirm the amount.
- Will the subsidy cover all the purchase and installation costs or just a proportion? Will it also cover other costs?
- Will stakeholders be able to choose amongst a range of tracking units from different suppliers?
- Will there be any other conditions?

#### **Consultation**

I note there has been consultation on the green paper, the strategy and the vessel tracking policy/guidelines. I also note that in relation to the vessel tracking proposal stakeholders have raised concern regarding the costs, privacy issues and practicality (*Vessel Tracking Consultation Report - feedback on draft policy and guidelines June 2018*). Was the concern related to the ongoing reporting costs?

- Were fishers aware of the size of the cost of purchasing and installing tracking units and the size of the cost of ongoing reporting costs associated with vessel tracking (\$30 to \$40 per month) when they were consulted in one or more of the above?
- I note that some fisheries are already required to install tracking systems. Have affected fishers raised any issues related to cost or practicality?
- Was the proposal amended as a consequence of stakeholder feedback during the consultations? For example the introduction of the QRIDA subsidy, being able to transfer units etc?
- Did stakeholders comment on the robustness of the \$30 to \$40 per month figure? How was this figure calculated?

#### **Other questions**

- Which section of the Regulation is being amended? Will the list be in a schedule of the Regulation?
- Does the Regulation currently contain a list of fisheries that need to install VMS?
- One of the amendments is to standardise provisions relating to vessel tracking equipment installation and maintenance. Currently are the provisions very different across fisheries?

Thanks very much for all your help.

Dom



Dominic O'Neill | Senior Analyst  
Queensland Productivity Commission  
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## Carrie Haines

---

**From:** [REDACTED]  
**Sent:** Friday, 5 October 2018 12:34 PM  
**To:** Dominic O'Neill  
**Subject:** RE: further questions thanks

Hi Dominic,  
Hopefully the following helps provide some context.  
Cheers  
[REDACTED]

**From:** Dominic O'Neill <[REDACTED]>  
**Sent:** Friday, 5 October 2018 11:55 AM  
**To:** [REDACTED]  
**Subject:** further questions thanks

Hi [REDACTED]

Thanks very much for all your help with this.

I've got a few extra questions. Could you please reply in email so I can keep a record to support OBPR's decision. I just need to assess whether the proposal has undergone a process equivalent to a RIS.

- I can see from the reports of the green paper and draft policy and guidelines consultations that stakeholders have concerns regarding the costs of tracking units (including the reporting costs). In their 7 Feb 2018 submission, re vessel monitoring systems, the Queensland Seafood Industry note that *'The business viability of hundreds of Qld commercial fishers is at stake', 'it would be helpful for DAF to conduct market/industry impacts of their proposals' and 'industry is unable to pass on the cost of VMS on to consumers as we are and will remain price takers at the mercy of buyers'.*
- I know stakeholders have been made aware of the tracking unit policy for sometime and have had an opportunity to provide comments through the consultation process but has DAF done any analysis of the impacts on fishers of having to install tracking unit? For example, the ability to pay of affected fishers, whether they can mitigate the cost by passing through to their consumers etc?

I do not believe that this has occurred.

I should point out however that fishing businesses vary greatly in their profitability. Some fishers operate highly profitable vertically integrated companies aimed at supplying high quality products to an established customer base while others fish regardless of market conditions and take whatever they are offered by the wholesaler they work with for product they catch. Some fishers identify themselves as 'lifestyle fishers' and often point out that profit maximisation is not their primary concern.

Going further into the economics of fishing, it would be incorrect to assume that all fish generates the same return to the fisher. Some fish depending on the species and quality may generate a return to the fisher of only a few dollars whereas others (mud crab for example) can average a return of \$60/kg on average and up to \$90/kg depending on quality and the market demand which fluctuates depending on the time of year. Christmas and Chinese new year are renowned for attracting near ludicrous prices for seafood.

I understand QSIA's position as any additional cost is going to make things difficult for businesses that are already marginally profitable. While there is definitely going to be an additional cost to industry associated with implementing the Government's policy, it is fairly minimal particularly if you view it from a \$/kg of fish taken by the fisher per month point of view.

- Could you confirm my understanding of the following:

- During the consultation on the draft vessel tracking policy and guidelines stakeholders were made aware that they would get a subsidy for part or all of the purchase and installation of tracking units but would have to pay all the ongoing reporting costs. Stakeholders were given ball park estimates of the size of the ongoing reporting costs. Licensees were notified directly that the consultation was taking place. Yes, our vessel tracking team informed me that this was the case this morning.
- After the consultation all licensees were sent the final vessel tracking policy, guidelines and installation and maintenance standard which included more accurate figures for the ongoing reporting costs and tracking unit purchase costs etc. This is correct.

Thanks very much

Dom



Dominic O'Neill | Senior Analyst  
Queensland Productivity Commission



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**Carrie Haines**

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**From:** [REDACTED]  
**Sent:** Tuesday, 9 October 2018 12:09 PM  
**To:** Dominic O'Neill  
**Subject:** RE: DAF908 Letter of advice amendment to the Fisheries Regulation 2008

Thanks very much Dominic, great working with you [REDACTED]

-----Original Message-----

**From:** Dominic O'Neill [REDACTED]  
**Sent:** Tuesday, 9 October 2018 12:02 PM  
**To:** [REDACTED]  
**Subject:** DAF908 Letter of advice amendment to the Fisheries Regulation 2008

Hi [REDACTED]

Thanks very much for all your help with this.

Please find attached our response to your enquiry

Please contact me if you have any further questions

Thanks very much

Dom  
[REDACTED]

[REDACTED] <HPE Content Manager record Information >-----

Record Number:DOC18/1917  
Title:DAF908 Letter of advice amendment to the Fisheries Regulation 2008

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