Submission to Fisheries Queensland on the Impact Assessment of Independent Onboard Monitoring of the East Coast Otter Trawl Fishery

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Executive Summary

QSIA thanks The Queensland Government for the opportunity to make this submission.

The Queensland Seafood Industry Association (QSIA), as the peak body representing Queensland's wild harvest commercial seafood sector, acknowledges the need for independent data validation of Threatened, Endangered and Protected (TEP) species interactions in the East Coast Trawl Fisheries. However, QSIA has identified substantial issues with the Independent Onboard Monitoring (IOM) program in its proposed form and does not support the options in the IAS.

The East Coast Otter Trawl Fishery (ECOTF) and the Commercial Fin Fish Trawl Fishery (CFFTF) have been acknowledged as leaders in adopting sustainability measures. Over decades, the ECOTF fishery has introduced turtle excluder devices (TEDs), bycatch reduction devices (BRDs), regional effort caps, vessel restrictions, mandatory logbooks, and extensive spatial and temporal closures. These reforms have been implemented at significant personal and financial cost to industry, yet fishers have embraced them to ensure the long-term sustainability of the resource. The outcomes delivered through these reforms are the very outcomes IOM claims it will provide.

The Impact Assessment Statement (IAS) fails to acknowledge this history and misrepresents the current status of the fishery. It exaggerates risk, labelling the trawl sector as "high-risk" while its own tables classify the fishery as "high-intermediate." It makes unsubstantiated claims of under-reporting and high non-compliance, damaging the reputation of the industry without providing evidence. Consultation has been inadequate, with fishers reporting that meetings and field trials felt tokenistic and predetermined. Participants have been left frustrated that feedback was ignored and that workable solutions proposed by industry were not considered. In exploring the option of an industry ownership model, it tried to ascertain the level of independence required for review of data. Perplexingly the model used by an already MSC accredited fishery was not deemed sufficiently independent. This approach undermines trust and damages the potential for constructive co-management.

QSIA recognises the importance of validated data to support EPBC Wildlife Trade Operation approvals (both Part 13 and 13A), Reef 2050 commitments, the Queensland Sustainable Fisheries Strategy, and to maintain social licence in an environment where public perception has a strong influence on the future of fisheries. It is critical to note that WTO approvals are conditional on demonstrating sustainable management of TEPS interactions. If IOM fails to meet its stated objectives, WTO approval may not be renewed, placing the entire fishery including its export access at risk. Importantly, the current WTO condition requires an ongoing program that provides independent data that is reliable and representative across all regions and validates protected-species logbooks; this does not imply 100% fleet coverage. Validation outcomes can be achieved more effectively through targeted validation, improvements to, and mandatory use of, electronic logbook systems, and the development of a threatened species management plan. Crucially, these

measures must be implemented in genuine partnership with industry, ensuring co-management and industry ownership of solutions rather than top-down imposition. Moving to a co-management model allows for self-monitoring and peer-based oversight, allowing fishers to be involved in the research and monitoring of their own fishery.

The IOM proposal outlined in the IAS is too ambitious in speed and scale. There are many elements yet to be determined. For example, there is no clear definition of what constitutes an acceptable level of TEPS interaction, and no information on which species cameras can reliably identify. The program also underestimates the technical challenges of installation across a diverse fleet (as experienced during the field trial).

Affordability is another major concern. Once government funding ends after the proposed four years, costs will fall back onto industry, with smaller operators in particular at risk of being forced out of the industry. While economic uncertainty was raised in the IAS, the full implications were not discussed, with focus on the review at year 2. This makes it difficult for the fleet to move forward with any certainty. Notably, the IAS cost–benefit analysis indicates a net disbenefit under all modelled options, underscoring the risk of imposing costs without guaranteed benefits.

Data ownership and privacy are further critical issues. A Data Retention and Privacy Policy needs to be established at the outset. Fishers have low confidence that Fisheries Queensland can securely manage sensitive footage. If released publicly, misinterpreted images of bycatch could seriously damage the industry's reputation and undermine social licence. QSIA proposes an alternative approach, where any electronic data is owned by industry, reviewed independently by a third party, and deleted within a strict timeframe. This model is already in use in other fisheries and would increase confidence among operators and crew. That said, experience elsewhere shows the picture may be more complex. For example, there may be greater risk of data security breaches with a third-party manager compared to established government protocols. What is clearly needed is a transparent, detailed outline of the regulations currently in place to safeguard data. If these are insufficient, they must be reviewed and updated, then communicated in a way that builds confidence among industry participants. Ultimately, any IOM framework must be industry-led, with safeguards shaped and endorsed by operators themselves, to ensure both trust and practicality. Without such safeguards, recruitment and retention of crew will also be at risk, as many will not accept constant surveillance in their workplace. The establishment of a new Working Group will be necessary as the Technical Focus Group that was established during the Field Trial has effectively been disbanded, with many participants feeling unheard.

Finally, the IAS draws on the NX fishery as a "gold standard" example. This comparison is misleading. The NX fishery has fewer than 30 operators and much shorter trips, making implementation far simpler. In contrast, ECOTF vessels can remain at sea for weeks at a time with extended times to get the fleet to shore (often days) to have IOM equipment installed or repaired. Even with strong

reporting, NX operators are still losing access to their fishery, which demonstrates that IOM provides no guarantee of access or security.

QSIA's position is clear. Validation of fisheries data is essential, but industry-wide IOM via cameras is not the only, nor the best, way to achieve it. The ECOTF has already demonstrated its commitment to sustainability through decades of reform. Strengthening existing systems through co-management, targeted validation, improved logbooks, and a dedicated threatened species management plan will deliver equal or greater benefits without imposing blanket surveillance and unnecessary costs on an industry that has already proven its willingness to lead. To support this position, QSIA has outlined a set of practical recommendations that provide a pathway for achieving validated data in partnership with industry. These recommendations are detailed below.

Recommendations:

The following recommendations outline the minimum conditions required for an IOM program to be workable. They are designed to safeguard fleet viability, deliver credible and representative data, and embed genuine co-management at the core of the process.

1. Staged Rollout of IOM Vessels
Initiate the program with a limited number of vessels in Year 1, expanding further in Year 2, with the exact number of vessels to be determined in direct consultation with industry. A carefully phased rollout will allow proper evaluation, problem-solving, and adjustment before further expansion is considered.

2. Representative Vessel Selection Across Regions and Effort Levels
Participating vessels should be selected firstly through a call for volunteers and then by a random selection method to ensure coverage across different management regions, effort levels, and risk profiles. This will avoid bias, build credibility in the data, and reflect the true diversity of the fleet.

3. Fair Compensation for Participation in Early Years
Provide upfront payments to cover lost opportunity costs[1] - $5,000 (+GST) for Year 1 vessels, $3,000 (+GST) for Year 2 vessels. This acknowledges the significant burden imposed on any volunteers and encourages early participation.

4. No Lost Fishing Time Due to IOM Failures
Where technical faults occur with IOM equipment, fishers must be allowed to continue their fishing trip before returning to port. If repairs cannot be made before Fisher is due to depart, fisher is allowed to depart on next scheduled fishing trip without operational IOM and allowed to remain at sea for the full duration of the planned trip. This ensures fishers are not penalised for equipment issues outside their control.

5. Structured and Timely Quarterly Reviews of Program Delivery
Independent quarterly reviews, completed within 21 days of quarter-end, should assess rollout timelines, data validation against TEPS reporting, technical performance (installation, reliability, privacy), and overall progress.

[1] For example lost fishing or rest days

6. Establishment of a Multi-Stakeholder Steering Committee
Create a Steering Committee with representatives from industry, Fisheries Queensland, eNGOs, and DCCEEW. Industry participants should be paid a seat fee ($1,000 per day) to recognise their expertise and commitment.

7. Pause Mechanisms for Underperformance and Independent Review
Include safeguards that allow an immediate pause to the rollout if objectives are not being met, with a 60-day review window. At the end of Year 2, conduct a full program review within 90 days before any expansion continues.

8. Guaranteed Long-Term Government Subsidy Until Fleet Viability is Proven
Maintain full government funding until the fleet's economic performance clearly demonstrates capacity to absorb costs, rather than ceasing support arbitrarily after four years.

9. Statistically Robust but Limited Footage Review Requirements
Review only the proportion of footage necessary for reliable validation. Take advice and learnings from other IOM programs, to ensure footage reviews meet international standards.. This protects efficiency, removes potential needs for duplication of efforts, and reduces unnecessary surveillance.

10. Voluntary Structural Adjustment Option for Operators
Provide a voluntary structural adjustment program for operators unable or unwilling to continue under an IOM framework, ensuring fair exit pathways while reducing overall fleet pressure.

11. Development of a Dedicated TEPS Management Plan Before Rollout
Introduce a Threatened, Endangered and Protected Species management plan, developed jointly with industry, to define acceptable interaction levels and provide guidance before implementation.

12. Formation of a Technical Working Group with Industry Leadership
Establish a technical group, including strong industry representation, to oversee installation, maintenance, and integration with the eFisher app. This ensures technical issues are resolved quickly and solutions remain practical.

13. Transparent Definition of Success Criteria and Acceptable TEPS Interaction Levels
Government must publish upfront, measurable criteria for what constitutes program "success" and define acceptable TEPS interaction levels. Without clear benchmarks, reviews cannot be objective or credible.

14. Strong Data Security, Privacy, and Crew Welfare Safeguards
Establish transparent data storage, access, and deletion protocols (with independent audit where required). Safeguards should also protect crew privacy, including mandatory face-blurring technology, to support recruitment and retention.

QSIA remains opposed to the IOM program in its current form. We urge government to pursue alternative, industry-led measures that strengthen existing systems without imposing unnecessary cost or surveillance. If IOM is nonetheless imposed, the recommendations set out above represent the minimum safeguards needed to ensure that the program is practical, proportionate, and fair. Only with these protections in place can data validation be achieved in a way that supports sustainability, maintains social licence, and preserves the viability of the fleet.

About Queensland Seafood Industry Association Inc

Queensland Seafood Industry Association Inc (QSIA) is Queensland's peak membership-based organisation representing the wild harvest commercial seafood industry. Its history dates back over 100 years. Membership activity ranges from the NSW border to the NT border and encompasses all forms of commercial fishing: namely line, crab, net and trawl. QSIA also has members that provide pre- and post-harvest goods and services to the industry.

As the only body representing the full diversity of Queensland's commercial fisheries, QSIA has consistently worked with government, researchers, and the community to achieve balanced fisheries management outcomes. This includes championing innovation, improved environmental performance, and the long-term economic resilience of the industry.

QSIA is proud to have Mr Keith Payne VC AM as its patron.

Relevance of Impact Assessment Statement.

QSIA has many members that operate in the ECOTF who are directly impacted by the topic of the IAS and the proposed introduction of IOM.

In preparing this submission, QSIA has listened to the views of both members and non-members, ensuring the perspectives represented here reflect the broader industry, not just a subset of operators.

It is noted that this is the first IAS released by Fisheries Qld under the current State Government and QSIA. For this reason, the IAS is of high relevance to our members and requires careful consideration to ensure it fairly represents the industry and leads to practical, evidence-based outcomes.

Our Submission

History of the ECOTF

Since its establishment, the East Coast Otter Trawl Fishery (ECOTF) has undergone major changes in management and structure. Early regulation focused on simple controls such as limiting vessel numbers and size, but over time more detailed measures were introduced, including effort unit allocations, gear requirements such as BRDs and TEDs, and the use of spatial and temporal closures (Lovett et al., 2023). What stands out in this history is the way industry has embraced these reforms, even though doing so has come at a significant cost. Fishers have consistently worked alongside government and scientists, trialling new technologies and adjusting their practices to meet environmental and legislative goals. Their willingness to adapt has been central to the success of these measures, driving the shift toward more sustainable and accountable fishing practices across the fishery.

The structure of the ECOTF has shifted markedly as these reforms have taken effect. In 1980, around 1,400 licensed vessels were in operation; by 2004 this had fallen to 252 (Lovett et al., 2023), creating a smaller and more efficient fleet. In 2001, the introduction of an effort management system linked access to vessel fishing days and effort unit conversion factors (EUCF), providing a more sophisticated way of controlling fishing pressure. This was refined further in 2020 when vessel capacity was capped at 20 metres (120 hull units, equivalent to 93 effort units) (Lovett et al., 2023). More recently, the introduction of regional harvest strategies and effort caps has greatly reduced ecological risks, particularly to highly vulnerable threatened, endangered and protected (TEP) species. In 2001 up to 2.26 million effort units were allocated in the Great Barrier Reef World Heritage Area (Queensland Government, 2001); now under the new framework, there has been a reduction of almost 15% in total effort units allocated in the region. This effort is spread across zones, with some such as the Northern Trawl Region having as little as 258,885 units before the effort cap is triggered (Queensland Government, 2025). At the same time, fishers were working with scientists to pioneer gear innovations. During the 1990s, turtle excluder devices (TEDs) were trialled before becoming mandatory in 2000, followed by bycatch reduction devices (BRDs) in 2001 (Northern Prawn Fishery Industry Pty Ltd, 2012). Together, these changes demonstrate how regulatory refinement, paired with industry cooperation, has reshaped the fishery into a more sustainable and accountable operation.

Today, trawl vessels are permitted to operate across 33% of the Great Barrier Reef Marine Park (Grech & Coles, 2011). In practice, however, only a small fraction of this available area is fished. Research in 2009 showed that just 6.3% of the Marine Park was trawled more than once for greater than five hours (Grech & Coles, 2011), but the actual footprint could be as low as 2.2% (suggested by recent, yet to be published research). This relatively limited footprint demonstrates the effectiveness of combined management and industry stewardship and illustrates how far the ECOTF has come in balancing productivity with sustainability. **I**t also underscores that the industry has already achieved significant reductions in ecological risk through cooperative reform, demonstrating that further measures such as industry-wide Independent Onboard Monitoring (IOM) are not warranted.

Overall response to the IAS

We will address each of the survey questions below, to ensure our points are clear and not left open to interpretation. But first, some overarching opinions and concerns about the IAS in general:

The stated objective of government action is*:*

> *to maximise the social, economic and ecological values of Queensland's fisheries resources through improved monitoring and independent validation of commercial fishing data, which requires balancing between competing uses both now and through the future*

This sets the tone for the whole IAS; however, it is a combination of purpose and methods. By including methods within the objective, you narrow the focus and options available to meet a higher priority. When objectives are framed too narrowly, there is a risk of incremental progress, and of fragmenting into piecemeal changes that suit the loudest voices rather than the public interest. Framing the objective well is critical to ensure the IAS leads to decisions that are compelling, cost-effective, publicly legitimate, and genuinely aligned with sustainable development. It can be the difference between token fixes or systemic solutions. We suggest an alternative:

> *The overarching objective of government action is to maximise the social, economic, and ecological value of Queensland's fisheries resources, both now and for future generations. Achieving this requires fair balancing of competing uses, guided by the principles of Sustainable Development underpinned by holistic process models, robust ecosystem monitoring, and valid commercial and recreational fishing data.*

This wording suggests that methods to achieve this objective may include independent monitoring and validation but are not limited to these.

The QSIA takes issue with the tone of the IAS. The IAS fails to recognise the substantial reforms that have already been delivered by the trawl fishery. Over decades, fishers have adopted and invested in new management measures, often at significant personal and financial cost, that directly reduce ecological risks and improve accountability. TEDs, BRDs, regionalised effort caps, and mandatory logbooks have all been embraced, demonstrating the industry's commitment to sustainability and continuous improvement. Reporting interactions with any protected species has been a legal requirement for commercial fishers since the EPBC Act came into effect in 1999. Fisheries Queensland published a data validation plan in 2018 (Queensland Government, Department of Agriculture and Fisheries, 2018) but this does not seem to have been implemented as rigorously as it needed to be. Despite this, the IAS suggests that TEPS interactions are under-reported, and that non-compliance with bycatch reduction regulations is high. No evidence is provided to support these claims. Such unsubstantiated statements in a public document damage industry reputation and strain the potential for working relationships between fishers and managers.

Further, the way risk is described is misleading. The IAS repeatedly labels the trawl fishery is a "high-risk" fishery. However, the table on p70 (Attachment 1) states the fishery is assessed as "high-intermediate" risk. This kind of exaggeration inflates the case for IOM and undermines confidence in the assessment process. A suggestion for reframing:

> *The trawl fishery has been assessed as having high-intermediate risk for TEPS. However, given the location of operations within the GBRWHA, UNESCOs current concerns regarding the GBR being 'in-danger', and the need for validating TEPS interactions for WTO approval, it is a high priority fishery for IOM.*

The IAS also frequently refers to issues associated with the gillnet fishery, such as the GBRMPA excerpt on page 17. These references are not relevant to trawl, and we oppose their reference within the document.

Consultation has likewise fallen short. An IAS can be seen as a basic form of consultation regarding a management change. However, fishers who engaged with the IAS process and port meetings felt that the decision to impose IOM was predetermined. The field trial reinforced this view: fishers walked away frustrated because their feedback was ignored and it was nearly impossible to test their own ideas. The trial felt like a box-ticking exercise, not a genuine attempt to co-design workable solutions.

QSIA is concerned about "Robo" submissions off social media campaigns historically conducted by various stakeholders and urges they be ignored, or treated as one submission. There is no visibility as to their origin, other than a name and/or email address (eg state, country, or even if they were a paid for or bot submission). Furthermore, more than likely, they have not read the IAS nor have any understanding of the issues, other than what is contained in the social media post. The continued acceptance of these "robo" submissions will undoubtedly see numbers grow in line with social media boost fees, with questionable value to the consultation process.

Rather than the top-down approach which assumes fishers are doing wrong and must be forced into monitoring, QSIA proposes the development of an IOM program via genuine **co-management**, starting with volunteer fishers in key priority areas. Fishers must be involved at the outset in designing and implementing an IOM program if it is to succeed. When fishers are actively involved and engaged in decision making, they are more likely to perceive the process as legitimate and transparent, reducing conflict, and encouraging stewardship and cooperation (Forsberg, 2017; Eggert et al., 2018). The recent field trial left more questions than answers, many of which have not been addressed in the IAS. Moving quickly and forcing an industry-wide IOM program upon fishers leads to resistance and mistrust.

Trawl fishers do recognise the need to validate logbook reporting and fisheries data, to ensure ongoing sustainability, evidence-based management, and public accountability. They recognise that IOM to validate TEPS interactions will help meet EPBC conditions for wildlife trade operation (WTO), *Reef 2050* commitments, *Queensland Sustainable Fisheries Strategy* commitments, and potentially appease UNESCO concerns related to the GBRWHA. Transparent, reliable data can also help maintain social licence in an environment where public perceptions strongly influence the future of fisheries. This recognition can be harnessed in a co-management environment, allowing the commercial fishery to lead and have ownership of the program.

It is important to be clear: validation of data is essential, but it does not automatically justify industry-wide IOM. The benefits outlined above can be achieved through existing and alternative approaches (e.g. targeted validation, stronger electronic logbooks, Crew Member Observers (CMOs), and a dedicated threatened species management plan) without resorting to blanket camera surveillance.

That said, if government proceeds with IOM, then the program must be designed very differently. It should be limited, milestone-based, and built in genuine co-management with industry, rather than imposed across the fleet. The IAS fails to present three viable options as required: the 'do nothing' option is not realistic given WTO and legislative obligations, and a genuine third option of industry-owned cameras with independent validation and co-management has been omitted.

QSIA believes the proposed IOM program is too ambitious in terms of speed of implementation across all (or potentially most) of the industry. It comes with substantial cost, with questionable outcomes. At this stage there is no clear plan for what is considered an "acceptable" interaction with TEPS, nor clarity on which species the cameras and crew can reliably identify. While there is a published regional risk assessment, there is no threatened species plan. Moving ahead with IOM in this vacuum is premature and misdirected. The plan should come first, and industry-led solutions should shape how monitoring is strengthened.

Further, if the aim of the IOM program is to validate logbook data of TEPS interactions, the question remains: what proportion of vessels need to be included in a monitoring program to achieve this to be "reliable and representative"? Logbooks already collect the data. At most, supplementary checks may be justified, but the IAS fails to show why full fleet-wide monitoring is required. The WTO require a plan for IOM that is "reliable and representative"[2], but there is no definition within the IAS of what "representative" means. This needs to be clearly defined well before vessel numbers can be determined and more accurate cost benefit analyses completed. The suggested speed and scale of implementation also greatly underestimate the work required to install the cameras in a diverse fleet of vessels, particularly when marine technicians are in short supply. The 2025 Maritime Workforce Plan notes critical shortages across maritime trades, including in Queensland, which makes it unlikely that enough technicians, especially those with specialist hydraulics expertise, could be mobilised to meet the proposed deadlines (Industry Skills Australia, 2025). The IAS does not clearly outline or include costings for a technical working group which will be required to problem solve installation and repair issues. Further, there will be substantial training needed, especially for fishers who are currently still primarily using paper logbooks and yet to adopt the e-fisher program. As above, we propose a slower introduction of IOM cameras in priority areas, using the 2-year review strategically to examine successes and failures, and to determine if/how best to move forward in proper consultation with industry.

Assuming the IOM program goes ahead as proposed, industry is concerned about the affordability of the program after the 4-year government funding has ceased. This is particularly true for smaller operators who cannot cover the potential additional costs of equipment and repairs, and risk being driven out of the fishery. Fishers of all vessel sizes are concerned about what such a program will mean for ongoing management fees, if the program goes forward at such a large scale. Trials already showed camera failures; while not mandatory this caused no stoppage, but if compulsory the

[2] DECLARATION OF AN APPROVED WILDLIFE TRADE OPERATION – QUEENSLAND EAST COAST OTTER TRAWL FISHERY, JUNE 2025

downtime and lost income from 12–24 hour steams back to port would be severe. Industry's position is that vessels must be allowed to continue operation in the event of IOM equipment failure.

There have been some suggestions that cameras could be used for broader compliance or bycatch monitoring. QSIA strongly opposes any scope creep. We propose Fisheries Queensland focus on the specific goal of the program – validation of TEPS interactions. The industry does not support the use of electronic monitoring devices as a compliance tool. Broader data needs regarding bycatch are already being addressed through QSIA led Fishery Improvement Projects, which propose to use camera footage to generate bycatch data to meet WTO Condition 9, but on terms set by industry, not through government surveillance.

Data ownership and privacy are critical. Fishers have little confidence that Fisheries Queensland would securely manage sensitive footage or prevent it from entering the public domain. Uninformed public perception of images of bycatch, particularly if misrepresented or circulated without context, has the potential to greatly impact social licence and public acceptance of the trawl fishery. QSIA therefore proposes that footage be owned by industry, reviewed by an independent third party, and disposed of within a strict timeframe (90 days from review). Exact details should be determined in further consultation. A Data Retention and Privacy Policy needs to be established at the outset. QSIA believes the retention of camera footage should be made exempt for Right to Information[3] consistent with proposed changes in New Zealand[4]. The rational is that the Fishers Logbook is the "accountable document" under the legislation. Once the raw footage has been used to validate the logbook, other than for compliance, there is no need to retain this footage.

Data security and privacy concerns also lead to fears surrounding crew retention and recruitment. Fisheries Queensland will need to work with owners and skippers to assure crew that their privacy is protected. Automatic face blurring technology should be mandatory. This is particularly important given the industry is already under pressure from workforce shortages, especially around crew retention and training (Industry Skills Australia, 2025) Development of programs to encourage new recruits into the fishery would also be beneficial to ensure ongoing capacity of the industry.

Finally, the IAS cites the NX fishery as a "gold standard." This comparison is misleading. NX has fewer than 30 operators, most on short trips, making implementation relatively simple. ECOTF vessels can be at sea for weeks, facing much greater technical and logistical challenges. Even with "gold standard" reporting, NX operators are still losing their fishery, showing that IOM does not guarantee access or security.

[3] AFMA have been subjected to RTI applications for boat camera data - https://www.afma.gov.au/reporting-and-accountability/afma-disclosure-log

[4] https://www.rnz.co.nz/news/political/569104/fisheries-act-reforms-to-allow-greater-catch-limits-on-board-camera-footage-to-stay-hidden

In short, validation of fisheries data is important, but industry wide, top-down implemented IOM is not the only, nor the best, way to achieve it. The proposed rollout is too fast, too costly, and too poorly designed. Strengthening existing systems through co-management, targeted validation, improved logbooks, crew member observations, and a dedicated threatened species plan will deliver the same or better outcomes without imposing blanket surveillance on the industry. QSIA would like to be working towards a 5, 10 and 25 year plan for our industry, not a narrow, piece-meal approach that reacts only to vocal demands.

Response to Online Survey Questions

The following responses address each of the Fisheries Queensland (FQ) survey questions. We note that the survey is framed on the assumption that Independent Onboard Monitoring (IOM) will be introduced across the trawl fleet. This framing feels less like genuine consultation and more like a justification for a decision that has already been made. QSIA rejects that presumption. Our responses reflect the strong view from fishers that while validation of data is important, blanket IOM is not the right or only way to achieve it.

Question 4: Do you agree with the need for improved monitoring and independent validation of commercial fishing data?

As stated above, trawl fishers do agree with the need for clear, transparent and validated data to ensure sustainable, decision-based management. Independent validation of TEPS reporting will meet WTO, Reef 2050, Qld Fisheries, and UNESCO needs and concerns, provide transparency and trust, and build social licence. However, this can be done with tools we already use, such as logbooks, electronic reporting, and targeted checks. While IOM could be useful, it needs to be industry led, not imposed across industry as a blanket IOM program.

Question 5: Do you agree with the proposal to establish an independent onboard monitoring program across the East Coast Otter Trawl Fishery and Commercial Fin Fish Trawl Fishery that uses e-monitoring systems?

Fishers do not support the rollout of a compulsory IOM program across the fleet. We want to see genuine co-management, with government working with fishers to design solutions that actually work on our boats. Blanket cameras forced on every vessel will not build trust. A fisher-led and owned program, starting small and targeted, would get far better results.

Question 6: Are there other monitoring or independent data validation methods that should be included in an independent onboard monitoring program? (Select all that apply.)

Fishers believe there are better and more practical ways to validate data than blanket cameras on every vessel. Options such as onboard observers, electronic logbooks, crew member observations, and improved education for fishers can all achieve the goal of ensuring accurate TEPS reporting. The key point is that any system must stay focused on what is actually required, which is validating logbook entries for external reporting

requirements. Broader uses, like compliance checks or bycatch monitoring, should not be rolled into an IOM program. These are already being addressed by industry through projects such as the Fishery Improvement Projects. While electronic monitoring tools may be used for bycatch assessment, proposals for this work are not mature enough to be formally included in the IOM program. If the program goes beyond TEPS validation, it risks losing focus, creating mistrust, and duplicating work that is already being done.

Question 7: What level of vessel coverage do you think an independent onboard monitoring program should have?

QSIA are not willing to put a figure on the level of vessel coverage an IOM program should have. This should be determined in further discussion with industry. Concerns and opinions are varied and need to be further explored and understood.

Some fishers believe targeting the high effort vessels, while missing those that may not have as much experience in avoiding TEPS is unfair. An alternative coverage could be achieved with a rotating system. Other fishers are concerned that cameras will not be feasible for some vessels – design and cost may make them unachievable.

While all fishers must maintain permission to interact with TEPs and be protected from prosecution under Part 13 of the EPBC Act, what is missing in the IAS is the question of how much coverage is required to achieve the goal of VALIDATING logbook reporting and therefore maintain approvals. The ECOTF WTO Conditions require a "Reliable and Representative" coverage with no definition of this, and the IAS does not give any indication that guidance has been provided from DCCEEW. The IOM program is not aiming to monitor TEPS interactions. It is meant to validate data that is already being collected.

Question 8: Do you agree with a risk-based approach to the implementation of independent onboard monitoring across priority vessels from the northern, central, southern inshore and southern offshore management regions of the East Coast Otter Trawl Fishery?

Fishers agree it makes sense to focus implementation in regions where interactions with TEPS are more likely, as identified in the ERA. But this must be voluntary and co-designed with industry, not imposed from above.

Importantly, risk is significantly more complicated than region or effort spread. Purely targeting IOM based on "risk" will most likely lead to a biased sample with skewed results. It is unclear whether data validation should be "representative" of the fleet, or for those activities that have the highest probability of interactions with TEPS. If the latter, the data will be clearly skewed, and not representative of the fleet. Extreme care will need to be exercised in the interpretation and publication of any data.

Question 9: Do you agree with the staged implementation of independent onboard monitoring across vessels that represent the highest fishing effort within each management region?

Opinions vary in response to this approach and we explain our position throughout this submission. A small number of fishers agree allocating by effort makes sense. Although they suggest application to effort-units instead of days fished, so that it is more accurate with respect to the quantum of coverage and equitable with respect to the distribution of user-pay costs down the track.

Note, our response to Q8 is also relevant here: we do not agree there is a linear relationship between days (or effort units) fished and risk of TEPs interactions. Care will need to be taken with interpretation of data. There are also concerns within industry that targeting high effort vessels is an unfair approach. Clearly more discussion with industry is required. Again, we propose a co-management approach, building trust within the industry and asking for volunteers to be involved in the initial stages of the program.

Question 10: Should any of the following criteria be used to support the implementation of independent onboard monitoring? (Select all that apply.)

Some fishers suggest compliance history and vessel size could be used.

In reality, any of the criteria listed could be used to determine coverage of IOM. Again, this needs to be determined in further discussion with industry. Importantly, the objective of the program is to have “representative coverage” across the fishery’s sectors to validate TEPS reporting. However, what does “representative” mean? Region, fishery type, target species, boat size? This needs to be clearly articulated (and quantified) to determine how best to achieve the goals of the program.

Question 11: Do you agree with the staged implementation of independent onboard monitoring over 4 years?

No. QSIA rejects the proposed four-year staged rollout. The timeframe is arbitrary and assumes IOM is already a done deal, rather than asking if it is needed at all. Rolling out cameras across such a diverse fleet within four years is not realistic – most operators are still on paper logbooks, marine technicians are in short supply, and there is still no threatened species management plan to guide what “success” even looks like. Pushing ahead on a fixed timeline not only risks wasting millions of dollars on a program that does not solve the problem it claims to but also risks the fishery falling short of its obligations and losing Wildlife Trade Operation accreditation, with severe consequences for exports and industry viability.

If monitoring is trialled, it should be milestone-based: start small, prove it works, prove it is affordable, and prove it delivers benefits before any expansion. Anything else is premature.

The first 2 years should be a continuation of the IOM trial so we can continue to develop the understanding of the technology, footage review protocols and build capacity in the sector.

Question 12: Should any other criteria or implementation timeframes be considered in the rollout of an independent onboard monitoring program?

Yes. Any timeframe must be based on milestones, not fixed years. The IAS assumes a steady rollout regardless of whether the program is workable, affordable, or even needed. A genuine alternative would be to start with small-scale voluntary implementation, use the two-year review to properly assess the IOM, and only consider expansion if it is proven to deliver benefits that cannot be achieved through other methods. Without this milestone-based approach, timeframes are nothing more than political deadlines, not practical solutions.

Question 13: Do you agree with the draft independent onboard monitoring program objectives?

See above for our critique of the overall objective of government action. The Draft objectives of an IOM program are addressed individually here:

• *Support monitoring of commercial fishing activities and validation of commercial fishing data, with a primary focus on TEP species interactions.*

Yes, we agree with the importance of validating TEPS reporting, but this can be achieved through existing logbooks and targeted checks. We suggest rewording this objective to focus on "validation of logbook reporting for TEPS interactions," which does not automatically assume blanket IOM.

• *Provide accurate and reliable data to support the sustainable management of the fishery through ERAs, harvest strategies, stock assessments and protected species management strategies.*

Agree in part. We suggest narrowing the focus to TEPS validation. Using IOM for harvest strategies or stock assessments is scope creep and not the priority at this point. Build trust and transparency first, before considering expanding objectives in true consultation with industry.

• *Increase the accuracy of commercial fishing data and support fisher improvements in the identification, reporting and handling of TEP species.*

Agree. This could be more specific in terms of TEPS interaction data. Improvements in fisher training and support would achieve this outcome without the need for blanket IOM.

• *Reduce non-compliance with regulatory requirements, focusing on the use of bycatch mitigation devices and monitoring actions that would have perverse outcomes for the sustainable management of catch, bycatch or TEP species.*

Fishers question whether non-compliance is an issue in this fishery. TEDs and BRDs are already mandatory and widely adopted. Including this objective implies non-compliance without evidence, which damages trust. Further, IOM is not a sufficient method to test compliance with bycatch mitigating devices: this would require on-hand testing by compliance officers, which is already implemented. Remove this objective. Behavioural science insights suggest that forced compliance can even be counterproductive for some stakeholder groups, especially when it undermines legitimacy or fails to align with local values[5].

• *Increase community confidence in commercial fishing practices and help improve the economic performance of commercial fishing businesses.*

We agree that community confidence is important. However, we reject the claim that IOM will improve economic performance. This is a separate policy goal outside of IOM and risks being used as justification rather than consultation.

Question 14: Should any changes or other program objectives be considered?

Yes. Industry data ownership, independent third-party review, and strict timeframes for deletion of footage (90 days from review) must be objectives. Without these, trust cannot be built. The IAS ignores these points.

An explicit objective should be to *build and support industry leadership and co-management in matters relating to sustainability and transparency of the fishery*.

Question 15: Do you agree with the proposed responsibilities of government and licence holders to support delivery of an independent onboard monitoring program?

As stated above in our overall response, we propose further discussion with fishers in a co-management framework, allowing industry to lead and take ownership of an IOM program. There is concern over data security and privacy. Industry data-ownership would reduce these concerns and help to build trust. Further, data should be reviewed by an independent third party, to ensure transparency and remove any potential bias. If a third-party is not feasible, government need to clearly outline their legal obligations in terms of data security and privacy, discuss with industry, and build confidence around this issue.

[5] https://www.publish.csiro.au/RJ/pdf/RJ17105

Question 16: Do you agree with the introduction of mandatory e-reporting via the Qld eFisher application?

While we agree with the introduction of mandatory e-reporting, Fisheries Queensland will need to provide substantial support to revise and assist fishers with the eFisher app. Some problems with the app have been recognised but not corrected, and a substantial proportion of the fleet are not yet using the app. Many are older fishers who have been operating with paper logbooks for decades – they will need assistance and understanding. The development of a "Desktop" version of the app will also facilitate its adoption. If mandatory e-reporting is to be introduced, QSIA would recommend that an industry support package be established to provide the necessary technology, training, and transition assistance.

Question 17: Should any other responsibilities, program components or operational requirements be considered in the design, implementation or delivery of an independent onboard monitoring program?

See our answer to question 15.

Throughout this submission, QSIA has expressed concern about access to trades to install and maintain this equipment. The experiences Fishers are currently facing with short supply of VMS hardware must be noted. Availability of IOM parts and equipment for post installation service and repair must be considered, with a requirement for a "Service Level Agreement" (or similar) with preferred suppliers.

Question 18: Do you agree with government funding the establishment and ongoing management of an independent onboard monitoring program for the first 4 years?

Fishers do not support IOM as proposed. If anything is introduced, government must fund it long-term. Shifting costs to industry after four years would force small operators out. The survey assumes the model is already in place and just needs funding – we reject that.

Question 19: Do you agree that a review of the independent onboard monitoring program should commence after 2 years of implementation?

Yes. Fishers support a review after 2 years, but it must be genuine. This is the point to assess whether an IOM program is meeting its stated objectives, satisfying external reporting needs, and whether it is affordable to continue. The review should also examine how long-term costs would be covered, and whether alternative approaches could deliver the same outcomes without blanket IOM. A time frame for the review to be completed must also be set.

Question 20: Do you agree that the identified benefits and costs for the independent onboard monitoring program options cover all the factors that should be considered in making a decision?

No. The IAS overstates benefits and downplays costs. It ignores practical realities like scalability of equipment supply and software support, installation across a diverse fleet, the shortage of marine technicians, and the challenges for operators still using paper logbooks. It also fails to address crew privacy, reputational risks if footage is misused, and the long-term affordability once government funding ends. Importantly, the IAS does not consider whether the scale of IOM would still be justified after two years. If, like in the NX fishery, no significant misreporting is found, then large-scale coverage would not be necessary and the program could be scaled back.

Further comment on the CBA is provided later in this document.

Question 21: Are there any inaccuracies in the assessment of the options?

Yes. The IAS calls the trawl fishery "high risk," when its own tables describe it as "high-intermediate." This exaggerates the case for IOM. It also compares the ECOTF unfairly with the NX fishery, which has fewer than 30 operators and far simpler operations. Such comparisons do not reflect the scale or complexity of the trawl fleet.

It also implies widespread non-compliance with TEDs and BRDs, even though these devices have been mandatory and widely adopted for decades. Suggesting non-compliance without evidence unfairly undermines industry reputation. Further, the IAS attributes progress on TEPS reporting to Fisheries Queensland, when in reality much of this progress was initiated by industry itself after the 2018 Data Validation Plan was poorly implemented. These inaccuracies reinforce the sense that the IAS is written as justification for IOM, not as an objective assessment.

The IAS also fails to present three viable options as required: the 'do nothing' option is not realistic given WTO and legislative obligations, and a genuine third option of industry-owned cameras with independent validation and co-management has been omitted.

Other inaccuracies are identified throughout this submission.

Question 22: Should any other factors be considered to evaluate the options?

Yes. Trust, fairness, and co-management must be central. Fishers want data to be owned by industry, reviewed independently, and destroyed within clear timeframes. Evaluation should also consider whether alternatives – like targeted validation or a threatened species plan - can achieve the same outcomes without blanket surveillance.

Elsewhere in this document several other factors are raised.

Cost Benefit Analysis

The Cost Benefit Analysis (CBA) is complex, made more so due to the number of assumptions required to determine an outcome. Having said that, there are a small number of key assumptions that have a significant impact on the results of the CBA.

- The most significant assumption is that by adopting IOM, the ECOTF will retain access to the GBRMP and WTO Approvals over the forward projections. In reality, WTO approvals are contingent on satisfying all conditions imposed, not just this one. Yet there are no guarantees in place that IOM will secure this access, and no comment is specifically made to reference the uncertainty of these future benefits. If these benefits do not materialise, the industry will have absorbed significant costs for no gain. This uncertainty must be explicitly recognised in the analysis. Furthermore, failure of IOM to deliver either of these future benefits will have significant adverse implications for the NER and GVP.
- The IAS states that "The economic goal is to minimise cost to the overall fishery but maximise coverage of effort"[6]. This assumes a linear relationship between effort and risk. QSIA argues that risk of interaction with TEPs is far more complicated. It is variable by spatial, temporal and crew knowledge considerations. Blanket IOM coverage, or coverage prioritising effort, is therefore a blunt and inefficient tool. A risk-based, milestone approach, designed in partnership with industry, would be more cost-effective.
- The NER analysis generates a net disbenefit in all scenarios. There is no comment around the implications of this for the industry (see further comment below in "Other Considerations"). In simple terms, the CBA shows that the fishery is worse off under every option modelled this should be a red flag for decision-makers, yet the IAS glosses over it

The CBA prompts the following comments:

- Policy settings must be established to complement the rollout of IOM if government proceeds against industry advice. Without these settings, the projected benefits are unlikely to be realised. These must include:
  - Establishing a TEP Management Plan for the ECOTF
  - Strong Statement of Support for the industry, indicating a preparedness to work with it to make any adjustments necessary to adapt accordingly
  - Development of a 25 year industry plan, linked to Prosper 2050, to allow the ECOTF to commit, with confidence, to a revitalisation of the fishery.
- A Data retention and privacy policy also needs to be established to support the rollout of IOM. QSIA believes the retention of camera footage should be made exempt for Right to Information consistent with proposed changes in New Zealand. The rational is that the Fishers Logbook is the "accountable document" under the legislation. Once the raw footage

[6] IAS. Page 81

has been used to validate the logbook, other than for compliance, there is no need to retain this footage.

- QSIA recommends that raw footage be deleted within 90 days of being reviewed and used to validate logbook data. The Fisheries Retention and Disposal Schedule (2015) should be amended accordingly.
- Privacy is addressed below in "Human Rights".
- Explicit prohibition on the use of footage for purposes outside TEPS validation (such as compliance or prosecutions) unless agreed to by industry.
- Data retention for the training of AI also needs to be considered.
- The use of AI to complete all fisher logbooks needs to be listed as a desired mid to long term outcome from the use of IOM onboard boats.

We also note in relation to the CBA:

- Future cashflows do not need to be grossed up for Inflation[7]
- The discount rates used for the base case and sensitivity analysis are in line with government policy and consistent with the numbers used by the Federal Government[8]
- Table A2.1 preferred option appears to be inconsistent with the preferred option in the IAS.
- There is doubt that the equipment will last 4 years, particularly on the boats operating in the wet tropics. Replacement and maintenance costs should be modelled realistically.
- The DPI IOM Management costs appear to be considerable. A team of 5 dedicated staff seems to have a lot of "padding".
- There is no guidance as to hardware ownership. While it is clear that the Government is funding the first 4 years, including system capital and installation costs, it remains unclear whether ownership passes to the Authority Holder on installation, or whether government retains liability. This is a critical gap in the analysis.
- Equity and fairness have not been considered in the CBA. Small operators will be disproportionately impacted once government funding ends, with no mechanism suggested to protect them. This omission makes the CBA incomplete.
- The option of scaling back coverage after two years, if misreporting is not detected (as demonstrated in the NX fishery), has not been modelled.

Human rights considerations

QSIA is concerned at the lack of detail in Attachment 3, given its profound implications to, not only this IAS, but more generally, to all government sanctioned surveillance of privately operated businesses.

[7] Commonwealth of Australia 2006, *Handbook of cost–benefit analysis*, Financial Management Reference Material No. 6, January, Canberra.
[8] https://oia.pmc.gov.au/sites/default/files/2023-08/cost-benefit-analysis.pdf

This IAS is proposing to allow Government to review footage of a private business's activity. To QSIA's knowledge, this is without precedent in Queensland. The Human right considerations of this are significant and must be protected.

Our legal system is based on the presumption of innocence; By contrast, mandatory surveillance flips this principle on its head, treating fishers as guilty until proven innocent.

QSIA is deeply concerned with the imposition of any third party review of a private business's workplace and insists on robust protections of Human Rights at all times. If government proceeds, strong safeguards must be put in place to protect privacy, restrict use of footage strictly to TEPS validation, and guarantee that footage is destroyed within a defined timeframe. Without this, the IAS risks setting a dangerous precedent for surveillance well beyond the fishing industry.

Other considerations

i) Planning Horizon / Certainty of Access / Latent Effort

The ECOTF needs certainty over a 25-year planning horizon if businesses are to invest in new vessels, technology, and staff. At present, the IAS and associated strategies focus on short-term, ad-hoc management changes, leaving operators without the confidence needed to commit to the long-term sustainability of their businesses. Certainty of access is also undermined by the treatment of unused (latent) effort, which continues to cast doubt over the security of existing licences. Without a clear long-term plan, the fishery cannot attract investment or secure generational succession.

ii) Fleet replacement (AMSA / fuel efficient etc)

The trawl fleet is ageing, and operators face significant regulatory pressure from AMSA requirements and fuel efficiency standards. Replacing vessels is a capital intensive, and without certainty of access, banks are unwilling to lend. Policy settings that encourage and support fleet renewal are essential to maintain safety, efficiency, and environmental performance.

iii) Concessional Loans

Access to concessional loans should be provided to support both vessel replacement and uptake of new technologies. Current commercial finance settings do not reflect the unique risk profile of fishing businesses, which face regulatory uncertainty as well as environmental variability. Without concessional finance, fleet modernisation will stall.

iv) Tax concessions

Targeted tax concessions could support investment in new vessels, gear innovations, and safety improvements. Other primary industries, such as agriculture, already benefit from accelerated depreciation and concessional tax treatments — the fishing industry should be afforded the same recognition.

v) Disaster funding

The trawl industry is regularly impacted by natural disasters such as cyclones and floods. These events can ground vessels for extended periods resulting in loss of catch, loss our caught product and cause severe infrastructure damage. A dedicated disaster funding mechanism for the seafood industry would provide resilience and ensure operators can recover quickly, safeguarding supply chains and jobs in coastal communities.

vi) Shore based infrastructure

Investment in shore-based infrastructure is vital to the future of the fishery. Cold storage, processing facilities, and safe harbour upgrades are all necessary if the industry is to meet domestic and export demand. Without coordinated infrastructure investment, efficiency gains made at sea will not translate to value on land. Many ports are operating on monthly leases from Transport and Main Roads, with major capital works urgently needed.

vii) IOM and AI

An outcome of any electronic IOM program should be the development of AI capabilities to a point where fisher logbook reporting is drafted by AI for fisher final approval and submission to Fisheries Queensland. This will take time.

viii) Invasion of privacy

As noted earlier, mandatory surveillance represents a serious invasion of privacy for both operators and crew. Fishers fear footage could be misused, misinterpreted, or accessed under FOI requests. Crew, in particular, will be reluctant to work under constant camera surveillance. Protecting privacy is essential to maintain recruitment, retention, and mental health in the fleet.

ix) Protected species management strategy

A dedicated protected species management strategy for the ECOTF is urgently required. This should define what constitutes an “acceptable” TEPS interaction, set measurable targets, and provide clear guidance for fishers. Implementing IOM in the absence of such a plan is premature and risks wasting resources on monitoring without direction.

x) Data Validation Plan

A review of the Data Validation Plan must be undertaken to ensure it remains relevant with any new IOM initiatives.

xi) Timeframe to keep footage (NZ changing rules to exempt from FOI)

QSIA believes the retention of camera footage should be exempt from Right to Information, as is being pursued in New Zealand. The fisher’s logbook must remain the accountable document under legislation. Once raw footage has been reviewed to validate logbook data, there is no justification for further retention. QSIA recommends footage be deleted within 90 days, and the Fisheries Retention and Disposal Schedule (2015) amended accordingly.

xii) Workforce recruitment and retention

Attracting and keeping skilled crew is already a major challenge for the ECOTF. The introduction of IOM and constant surveillance risks making this worse, as potential recruits may be unwilling to work

under cameras. Government policy should support recruitment and retention programs, including pathways for training and professional development, rather than adding new barriers.

xiii) Mental health and wellbeing

Fishing is a demanding occupation, with long hours and extended periods at sea. Surveillance increases stress and undermines trust, which may negatively impact mental health in crews. Any policy settings must consider the human impact of monitoring and provide protections for crew wellbeing.

xiv) Voluntary Structural Adjustment

If the Government is unable or unwilling to facilitate certainty for the industry over a timeframe which provides certainty for large capital investments (25 years minimum), QSIA believes that a voluntary structural adjustment should be offered. A reduction fleet size will reduce potential TEP interactions. It may also have an economic benefit to those who wish to remain in the industry. The terms of any structural adjustment would require industry consultation.

xv) Risk of rapid deployment

The Field Trial for electronic IOM in the ECOTF identified many issues. QSIA is concerned that deployment of electronic IOM to a timeframe that does not provide any flexibility for adjustment due to unidentified issues. As mentioned earlier in this document, confidence that the project (however scoped) will deliver quality data that enables TEP logbook validation from day one, is essential.

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Glossary

Abbreviation	Meaning
AMSA	Australian Maritime Safety Authority
BRD	Bycatch Reduction Device
CBA	Cost Benefit Analysis
CFFTF	Commercial Fin Fish Trawl Fishery
DCCEEW	Department of Climate Change, Energy, the Environment & Water
ECOTF	East Coast Otter Trawl Fishery
eNGO	Environmental Non-Government Organization
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
ERA	Environmental Risk Assessment
EUCF	Effort Unit Conversion Factors
FQ	Fisheries Queensland
GBRMP	Great Barrier Reef Marine Park
GBRWHA	Great Barrier Reef World Heritage Area
GBRMPA	Great Barrier Reef Marine Park Authority
GVP	Gross Value of Product
IAS	Impact Assessment Statement
IOM	Independent Onboard Monitoring
Prosper 2050	Primary Industries Prosper 2050, A 25-year blueprint for Queensland's primary Industries. Queensland Government. 2025
NER	Net Economic Return
NX	Transitional East Coast Set Net Fishery
Reef 2050 Plan	Reef 2050 Long-Term Sustainability Plan
TED	Turtle Excluder Device
TEP	Threatened, Endangered and Protected Species
WTO	Wildlife Trade Operations (under Parts 13 and 13A of the EPBC Act)

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