Impact analysis statement

Frequently Asked Questions

What is Independent Onboard Monitoring?

Independent Onboard Monitoring includes the use of onboard cameras ('e-monitoring' system) or fishery observers to independently validate commercial fishing interactions with protected species and bycatch. Independent Onboard Monitoring methods support the independent validation of commercial fishing data by comparing data from two different sources – for example, data provided by fishers (e.g. logbook catch and effort records) and data provided by an independent third-party or another sources (e.g. onboard camera footage captured with an electronic monitoring or 'e-monitoring' system).

The comparison of these two data sources provides the ability to assess the accuracy of logbook records, enhancing the ability to detect any errors or biases in the data – ensuring high-quality data is used to underpin fishery management decisions supported by science, as well as provide confidence to regulators and the community that fisheries are sustainably managed.

Why do we need Independent Onboard Monitoring?

Independent Onboard Monitoring methods are the primary tools available that can validate commercial fishing interactions with protected species and bycatch. This is because protected species and bycatch are discarded while fishing at sea and there are no existing mechanisms in place to validate or monitor these interactions during a fishing operation.

What happens if we don't implement Independent Onboard Monitoring?

Failure to implement Independent Onboard Monitoring methods across priority trawl fishing vessels will result in the following impacts:

- The loss of Commonwealth Wildlife Trade Operation approvals, issued under the Environment Protection and Biodiversity Conservation Act 1999, which permit the export of product harvested from Queensland's commercial fisheries and afford commercial fishers protection from prosecution under the Environment Protection and Biodiversity Conservation Act for unintentional interactions with Threatened, Endangered and Protected species.
- The loss of valuable fishing grounds within the Great Barrier Reef Marine Park if access arrangements are reviewed.
- Reassessment implications regarding the World Heritage status of the Great Barrier Reef.

What is an Impact Analysis Statement?

An Impact Analysis Statement assesses the potential impacts of proposed regulation on businesses, government and the community, and assists decision-makers understand the potential consequences of a regulatory proposal, ensuring that it is well-designed, well-targeted, and fit-for-purpose. More information is available in the Queensland Government Better Regulation Policy.

What is the objective of government action?

The 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.

The Impact Analysis Statement also outlines several actions and priorities that support the development of a final option that meets the objective of government action, including:

- the preservation of Commonwealth government Environment Protection and Biodiversity Conservation Act approvals
- maintaining commercial fishing access to the Great Barrier Reef World Heritage Area
- the delivery of recommendations required to maintain the world heritage listing status of the Great Barrier Reef World Heritage Area
- improvement in the accuracy and reliability of data recorded by commercial fishers which is used for management decisions
- the introduction of methods and strategies that support commercial fishing businesses with improved market access and economic performance
- improved reputation of Queensland's fisheries and increased community confidence in sustainable commercial fishing practices.

What options have been considered in the Impact Analysis Statement?

The Impact Analysis Statement presents two key options for consideration:

1. Option 1 – Maintain status quo (i.e. not implement Independent Onboard Monitoring)
2. Option 2 – Implement an Independent Onboard Monitoring program consisting of e-monitoring systems to monitor and validate interactions with protected species.

Three effort-based scenarios have been considered under Option 2 including:

- Level 1 – 100% of Commercial Fin Fish Trawl Fishery and East Coast Otter Trawl Fishery vessels
- Level 2 – 100% of Commercial Fin Fish Trawl Fishery vessels and East Coast Otter Trawl Fishery vessels that account for 90% of fishing effort
- Level 3 – 100% of Commercial Fin Fish Trawl Fishery vessels and East Coast Otter Trawl Fishery vessels that account for 25% of fishing effort.

Other options considered in the Consultation Impact Analysis Statement including improved education, reporting and awareness, vessel tracking systems, compliance monitoring and onboard observers. In the consideration of options, it was determined that while there are several individual strategies and processes available to support improved monitoring and independent data validation, individually no single option was able to achieve the objective of government action.

What option is recommended in the Impact Analysis Statement?

The Consultation Impact Analysis Statement recommends the implementation of an Independent Onboard Monitoring program across 100% of Commercial Fin Fish Trawl Fishery vessels and East Coast Otter Trawl Fishery vessels that account for 90% of fishing effort (Option 2, Level 2).

All vessels within Commercial Fin Fish Trawl Fishery have been recommended as there is a low number of licences and active vessels in this fishery.

Why is the 90% effort coverage level proposed across the East Coast Otter Trawl Fishery?

The 90% effort scenario (Option 2 – Level 2) was recommended for the East Coast Otter Trawl Fishery as part of a risk-based and cost-benefit analysis. As shown in the image below, 90% of annual fishing effort across the East Coast Otter Trawl fishery was contributed by 68% of vessels in the 2023 fishing season. Fishing effort is a common factor used to determine risk. For example, a vessel that fishes more, may be more likely to interact with protected species.

Prioritising vessels with the most fishing effort ensures the costs and benefits of implementing a program are optimised, as these high effort vessels undertake the majority of fishing.

Although other effort scenarios may be more affordable, such as level 3 coverage (25% fishing effort), lower vessel coverage is not expected to deliver a representative Independent Onboard Monitoring program that will achieve export approval conditions.

While higher effort scenarios may also be considered appropriate, they have not been recommended because of the additional program establishment and ongoing operational costs to cover vessels that contribute a low amount of fishing effort.

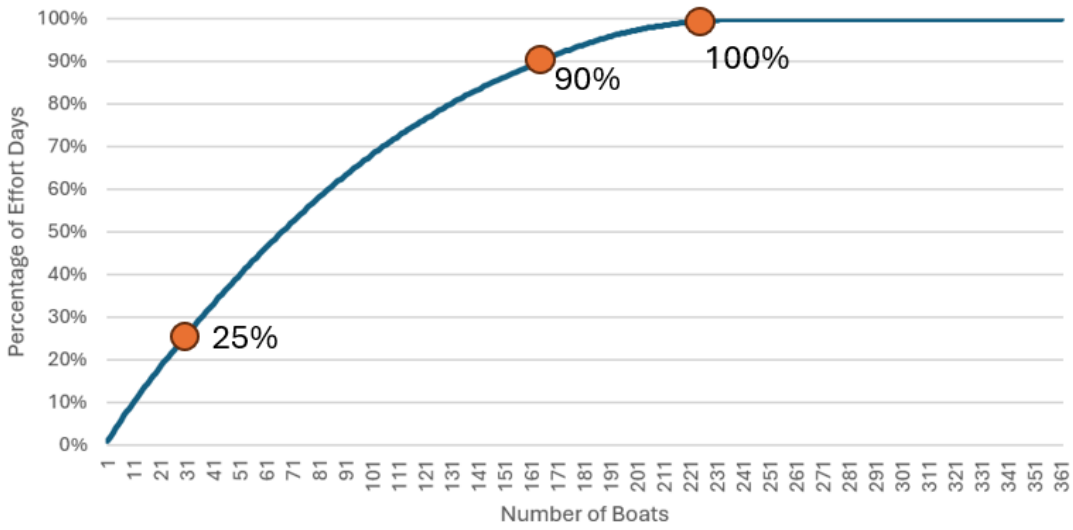

Figure 2: Fishing effort across trawl vessels in the ECOTF (IAS p.41)

What information was used in the cost-benefit analysis?

The cost-benefit analysis conducted as part of the Consultation Impact Analysis Statement relied on a range of data sources to ensure a comprehensive assessment of the program's financial and economic impacts. This included results of the field trials of onboard camera systems and fisheries economic data.

An independent consultancy, BDO, collected key cost estimates collected through a survey during 2021–22. This survey provided insights into the economic performance of commercial fishing businesses, helping to refine the cost estimates for establishing and operating the Independent Onboard Monitoring (IOM) program.

The analysis also considered costs associated with hardware, data storage, footage review, and ongoing management, with these costs divided into two stages: a four-year establishment phase and the subsequent ongoing operational phase. While the current cost-benefit analysis offers a robust foundation for decision-making, a review will be conducted two years after the program's implementation. This review will include updated costings and economic data, ensuring that the program remains financially sustainable and fit for purpose.

Why are e-monitoring systems recommended over observers?

The use of e-monitoring systems in place of fishery observers has several potential benefits, including reduced labour costs, improved scalability and monitoring coverage across the fleet, improved confidence in data accuracy (e.g. fisher behaviour does not change between trips with and without observers), and reduced workplace health and safety considerations.

Observers are also not able to be deployed onboard all commercial fishing vessels across the East Coast Otter Trawl Fishery with much of the fleets vessel safety certificates and onboard safety management systems not consistent with national safety standards set by the Australian Marine Safety Authority, and updates would be required for them to safely deploy observers.

Why is a voluntary program not proposed as an option?

While it is preferable that an Independent Onboard Monitoring Program is voluntarily adopted by industry, it is unlikely due to the costs involved and privacy concerns of fishers. While a select number of vessels across the fishery have introduced Independent Onboard Monitoring, and others have started to explore the introduction of e-monitoring, voluntary uptake is likely to be too slow to satisfy conditions under Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Also, EPBC Act approvals apply to a whole fishery and are not allocated on a business-by-business basis, so the approval would not be maintained if only a select number of fishers (such as only those operators who export) adopt IOM methods. Further, a review of access arrangements to the Great Barrier Reef is also expected to apply to the entire fishery.

The introduction of a regulatory framework, the requires a mandatory program and includes an implementation timeline is expected to meet conditions of EPBC Act approvals and fishery management expectations within the Great Barrier Reef Marine Park.

How can I provide feedback on the Impact Analysis Statement?

Stakeholders are encouraged to respond to an online survey available on the Engagement Hub website: https://dpi.engagementhub.com.au/onboard-camera-trial.

Stakeholders can also book in a face-to-face engagement session with Fisheries Queensland staff. Appointments are available on the Engagement Hub website: https://dpi.engagementhub.com.au/onboard-camera-trial.

When does consultation close?

Consultation is open for at least 4 weeks and closes **5pm, Sunday 24 August 2025.**

When will a final decision be made?

Feedback received from the Consultation Impact Analysis Statement will be summarised into a consultation report and used to draft a Decision Impact Analysis Statement. A Decision Impact Analysis Statement will be prepared to support Government make a final decision and inform drafting of any subsequent regulatory framework. A Decision Impact Analysis Statement will be prepared for Government consideration before December 2025.

Who is going to pay for an Independent Onboard Monitoring program?

Combined Queensland and Australian government funding is available to support the establishment of an Independent Onboard Monitoring program over 4 years. It is proposed that part of this funding would be applied over 4 years to support establishment of the program. This proposed funding arrangement will mitigate any impacts of the direct cost of establishing an Independent Onboard Monitoring program over the first four years.

It is also proposed that a review would be undertaken after 2 years of implementation to support further analysis and consideration of the costs of an ongoing program and who might pay.

How much will an Independent Onboard Monitoring program cost?

There are several variables that impact the ongoing costs of an Independent Onboard Monitoring program. These include the:

- number of vessels with e-monitoring systems
- objectives of a program (i.e. what commercial fishing data is being validated)
- amount of video footage transferred and reviewed
- cost contributions (i.e. who pays for what)

The introduction of Independent Onboard Monitoring is not expected to result in any additional costs to licence holders as government has proposed to fund establishment.

Under the effort scenarios investigated, and the best available estimates, annual costs for an ongoing program per trawl vessel, after establishment, could cost between $1947 - $8,934 across the 25% - 100% effort levels. It's important to note that any change to program variables would change these estimates.

No decisions on who pays for an ongoing program have been made. A review into the Independent Onboard Monitoring program costs will be undertaken as part of the two-year review. This review will inform the ongoing costs of a program and potential cost recovery models with stakeholders afforded another opportunity to comment.

Who will own and maintain the cameras and how will they be installed?

It is proposed that government will purchase and own the cameras, and organise the relevant technicians required to support installation and maintenance during the establishment stage.

What type of camera system will be used?

An open market procurement process will be undertaken to source goods and services to support a future program, including the e-monitoring systems that will be used. Key learnings from the onboard camera field trial will be used to ensure functionality and performance of future e-monitoring systems will be fit-for-purpose.

What are the proposed responsibilities of government and industry?

It is proposed that government will be responsible for the establishment (e.g. installing e-monitoring systems onto vessels) of an Independent Onboard Monitoring program, the review and validation of data, and general program management.

It is proposed that fishers are responsible for making their vessel available for the installation of e-monitoring systems, ensuring e-monitoring systems operational during all fishing events and reporting electronically with the e-fisher reporting application.

How are the privacy concerns of skippers and crew addressed?

Privacy by design is an important consideration as part of a future program. Several strategies would be implemented to reduce the capture of personal information including:

- Automatic operation of onboard cameras – so they only record during the catch hauling and sorting processes
- Electronic transfer of video footage, where possible – to reduce the amount of footage transferred from the vessel
- Positioning of onboard camera systems – to reduce the cameras field of view to only focus on the locations of the vessel where catch hauling and processing occurs
- Encryption of camera footage– so footage is not able to be accessed or viewed by third parties
- Privacy shields and video blurring, where possible – to reduce the capture of personal information, such as a person's face, and the recording of vessel locations that don't need to be viewed.

What would happen if an e-monitoring system breaks when fishing?

Experience from the onboard camera field trial has shown that e-monitoring systems can have operational issues. A key learning from the implementation of vessel tracking systems was the significant impacts to commercial fishers when they were not able to go fishing if a unit was not operational and easily replaceable. This learning will be key to help inform the development of a malfunction procedure for the Independent Onboard Monitoring program so that for circumstances outside of fishers control, they can continue to fish.

We intend to work with the Technical Focus Group to create clear guidelines on how to use and troubleshoot Independent Onboard Monitoring equipment and develop suitable processes for when Independent Onboard Monitoring equipment may be malfunctioning. We will need to strike a balance that ensures enforceability of a program can be supported but minimises impacts to fishers who strive to do the right thing.

What testing have you already done and how will you ensure that these systems don't break down or affect my fishing operations?

During 2023/24 we conducted a field trial that tested the performance of 6 different e-monitoring systems on 11 volunteer vessels from the East Coast Otter Trawl Fishery and Commercial Fin Fish Trawl Fishery. The performance and reliability of the e-monitoring systems varied and identified the need for widespread technical support under any future program. The trial also showed that increased support and resourcing will be required during the 'settling-in' period of a future program and a risk-based, staged implementation is recommended across a large fleet of vessels such as the East Coast Otter Trawl Fishery. Experience from the field trial will be used to procure e-monitoring goods and services that are reliable and fit for purpose for the trawl industry.

Management decisions about how a malfunctioning system might affect a proposed or underway trip have not been made. We plan to work with fishers to create clear guides on how to use and troubleshoot Independent Onboard Monitoring equipment and develop suitable processes for when Independent Onboard Monitoring equipment may be malfunctioning.

Where would cameras be installed and what would they record?

The layout of cameras would be unique to each vessel with the primary objective being the recording of interactions between fishing gear and protected species. In most cases this will require camera/s mounted over the catch sorting areas (such as sorting tables and hoppers/conveyors), as well as camera/s mounted on vessel A-frames to provide a view over the gunwales of the vessel to detect Threatened, Endangered and Protected species interactions as the nets are retrieved.

Cameras would record all shots, with a primary focus on when the net is hauled from the water and catch is sorted.

Do the cameras run 24/7?

The e-monitoring systems must run 24/7 however, the cameras do not record all the time. The final recording rules (the rules that trigger the recording of the onboard cameras) are yet to be finalised and will likely be unique to the fishing behaviour and onboard equipment of each vessel. Some cameras may only trigger recording when winches are activated, whereas others may record continuously (24/7). For cameras that record 24/7, we will use winch sensor information to determine when fishing is occurring and only request via e-transfer that footage for review. This will ensure only fishing activities are recorded, ensuring as much privacy for fishers as possible.

How is personal information handled?

The Department takes the security and protection of information it collects seriously. Personal information collected as a byproduct of the monitoring program may include video footage and images of crew members. The collection of this personal information is minimised through the 'privacy by design' principles which aim to avoid collection of images of people in the first place, designing the system and camera angles to focus on sorting trays and fishing equipment not people.

Any personal information will be collected, stored, handled and used in accordance with the Privacy Principles in the *Information Privacy Act 2009*. Further information on the Act can be found at (*Information Privacy Act | rti.qld.gov.au*).

Is camera footage accessible through the right to information?

Camera footage and associated data collected by onboard cameras may be requested under the *Right to Information Act 2009*. The right to information process ensures transparency, facilitating access to government information while protecting individual privacy. Under this process, the Department of Primary Industries may be legally required to share information from the Independent Onboard Monitoring, including camera footage.

All right to information requests are reviewed on a case-by-case basis, and personal information is typically not released. If footage is shared, it often consists of smaller portions or still images with identifying features redacted. Access may also be limited to government offices rather than full copies being provided. The Department of Primary Industries carefully considers privacy concerns by individuals involved and will consult with the persons impacted and provide the opportunity to appeal the release of information.

Fisheries Queensland regularly publishes collated datasets on commercial fishery interactions with Threatened, Endangered, and Protected species. These publicly accessible datasets are available on the Government's Open Data Portal, ensuring transparency while protecting personal data.

Who will own the camera footage?

Camera footage will be collected, stored and managed consistent with the department's obligations under legislation, including the Information Privacy Act and records retention policies. The camera footage includes sensitive personal information and will be protected and managed accordingly. If collected under a regulatory framework, the camera footage would become a Queensland Government record.

Storage, ownership and access to the data will be no different to other established programs where Fisheries Queensland collect commercial fishing data, such as through logbooks. Fishers may be provided access to their camera footage. Fishers would be entitled to request copies of this data, just like any other commercial fishing data Fisheries Queensland collect, provided any request and release of footage is consistent with legislative requirements.

How do we know the footage won't be accessed by Non-Governmental Organisations and used against industry?

Footage that is recorded is encrypted and can only be accessed by authorised personnel. If collected under a regulatory framework, the camera footage would become a Queensland Government record. All Queensland Government records are subject to release under the *Right to Information Act (2009)*. Footage may be requested by external parties, but for any footage to be released, it would need to be demonstrated that it is in the public's best interest to do so. This is yet to be tested, but similar requests have been made to the Australian Fisheries Management Authority's e-monitoring program. These requests were unsuccessful. If a request is made in Queensland, the involved fishers would be contacted by the Office of the Information Commissioner and consulted about its release. In this case, fishers may request that the footage not be released but they must be able to provide a strong argument for doing so. Fishers also have appeal rights under the Act if such requests are not successful. Additionally, there are also provisions in the Act to mitigate against requests made without sufficient grounds.

During the field trial the footage was subject to the Commonwealth Freedom of Information Act (1982), and no requests for footage were received from third parties.

Who are you using from industry to assist the design of a fit-for-purpose system?

During the onboard camera field trial, a Technical Focus Group was formed with government and field trial participants to support the discussion of camera performance during the trial and inform evaluation of the field trial results.

Following the completion of the field trial, a new Technical Focus Group will be formed to support the design of future program components. It will be important to ensure a diverse range of stakeholders are included to provide valuable insights to help support the design a fit-for-purpose program the meets.

A request for nominations will be circulated shortly. Fishers who are interested in contributing to this process can contact us at datavalidation@dpi.qld.gov.au to express their interest in joining the group.

I don't export my catch, how is this going to affect me?

Even if you do not rely on exporting your catch, the loss of WTO export approval if IOM is not implemented will have significant consequences for the whole trawl fishery. A significant number of operators do export their catch from the ECOTF and if these fishers are no longer able to export their catch, they will likely send their catch to the domestic market, likely lowering beach prices across the entire fishery.

TEP interactions will probably increase and this will look bad for industry, what will happen if TEP interactions go up?

When independent onboard monitoring programs have been implemented in other fisheries they are usually accompanied by a significant increase in the number of reported interactions with protected species. This is also likely to occur if independent onboard monitoring is rolled out to the trawl industry as fishers will be unaware which fishing days and events will be reviewed and will likely change their behaviour to record all their logbook information more accurately. This will lead to more accurate data, which removes speculation around interaction rates and can be used to create value for industry and fishery management. All interaction rates will be considered in their individual context and will form an improved picture of the impacts of the trawl fishery on protected species.

Is the Department considering CCTV systems? Or can I use the footage from the existing CCTV system onboard my vessel?

Experience from the field trial has indicated there are several benefits associated with the use of purpose-built e-monitoring systems over generic CCTV systems. Key benefits include improved automation in data handling, transfer, storage and review. These improvements reduce program management costs and improve the footage review and validation outcomes. The purpose-built e-monitoring systems also provided improved data security measures over the CCTV system. Another key consideration is the scale of the ECOTF. While CCTV systems may be appropriate at smaller scale operations, they are not considered appropriate for larger fishing fleets.