Independent onboard monitoring in Queensland trawl fisheries

Impact analysis statement consultation report

DELIVERING FOR QUEENSLAND

Queensland Government

This publication has been compiled by Fisheries Queensland, Department of Primary Industries.

The Department of Primary Industries proudly acknowledges Aboriginal people and Torres Strait Islander people as the Traditional Custodians of the Country. We recognise their continuing connection to land, sea, waters and sky. We pay our respect to them, their cultures and to their Elders past and present and commit to ongoing reconciliation.

Contents

1 Summary

Public consultation on options to implement improved monitoring and independent validation of Queensland's trawl fisheries, including the East Coast Otter Trawl Fishery (ECOTF) and the Commercial Fin Fish Trawl Fishery (CFFTF), was conducted over an eight-week period, concluding on 7 September 2025.

The consultation process included the public release of a Consultation Impact Analysis Statement (IAS) paper: *Options to implement independent onboard monitoring in Queensland trawl fisheries, Consultation impact analysis statement*.

The Consultation IAS presented two main options for consideration. Option 1 was to maintain the status quo, with no new regulations mandating Independent Onboard Monitoring (IOM). Existing measures, such as compliance monitoring and education programs, would continue, but data validation and monitoring gaps would remain.

Option 2, the preferred option, proposed implementation of an IOM program across the ECOTF and CFFTF. It included three sub-options with varying levels of effort coverage with e-monitoring systems:

- Level 1 - 100% of CFFTF and ECOTF vessels
- Level 2 - 100% of CFFTF vessels and ECOTF vessels that account for 90% of fishing effort
- Level 3 - 100% of CFFTF vessels and ECOTF vessels that account for 25% of fishing effort.

The recommended approach was Option 2, Level 2, with 90% coverage of the ECOTF and 100% of the CFFTF, as it balances cost-effectiveness with achieving program objectives. This option also included a risk-based, staged implementation, using e-monitoring systems to ensure data reliability.

Feedback on the proposed options were gathered through extensive consultation and engagement activities resulting in a total of 10,293 written and verbal submissions. This included:

- 81 survey responses submitted through an online platform
- 14 written submissions received directly from stakeholders and industry groups
- 89 verbal submissions provided during 14 engagement sessions
- 596 endorsements from the Queensland Seafood Industry Association (QSIA) via an online campaign
- 9,513 endorsements from the Australian Marine Conservation Society (AMCS) via an online campaign.

All written and verbal feedback was considered as part of the consultation process and is summarised in this report. Survey responses, which provide quantitative data, are presented to provide a clear analysis of respondent perspectives. Other forms of feedback, including written and verbal submissions, have been summarised along with the survey results to capture key themes.

Feedback during the consultation period was sought on topics including:

- other monitoring or independent data validation methods to consider
- support for improved monitoring and independent validation of commercial fishing data
- draft objectives and design of an IOM program
- preferred levels of vessel coverage for an IOM program
- criteria for prioritising vessels or regions for a risk-based staged approach to implementation of an IOM program
- proposed responsibilities of government and licence holders
- introduction of mandatory electronic reporting via the Queensland eFisher application

- funding and cost-sharing arrangements
- accuracy and factors considered in the analysis for the program
- general feedback, concerns, or suggestions about the proposed IOM program or options analysis presented in the consultation IAS.

Across verbal and written feedback received, many commercial fishing stakeholders, including the QSIA, supported the need for improved independent validation to ensure accurate and reliable data. However, many of these strongly opposed the proposed recommendation of 90% effort coverage under an IOM program, raising concerns about the scale, cost, and practicality of the approach.

Industry stakeholder recommendations focused on alternative approaches, such as improved training for skippers and crew, voluntary participation, co-designed and co-management models, and targeted monitoring. They raised concerns with the proposed implementation timelines, and emphasised the need for privacy protections, equitable rollout processes, and voluntary structural adjustment packages to support fishers who are financially unable or unwilling to address the impact of the program. Some commercial fishers highlighted the importance of allowing fishers to own their camera systems and access their footage, particularly to meet third-party accreditation requirements, such as Marine Stewardship Council (MSC) certification.

The AMCS and World Wide Fund for Nature (WWF) strongly supported the proposed program, emphasising its importance for enhancing sustainability and maintaining the social licence of the fishery. Submissions received from AMCS and WWF recommended mandating IOM for all active vessels, prioritising high-risk areas (particularly those overlapping with the Great Barrier Reef World Heritage Area), completing the rollout within two and a half years, conducting a minimum 20% review of available camera footage, and investing in Artificial Intelligence (AI) technology to improve efficiency and reduce costs.

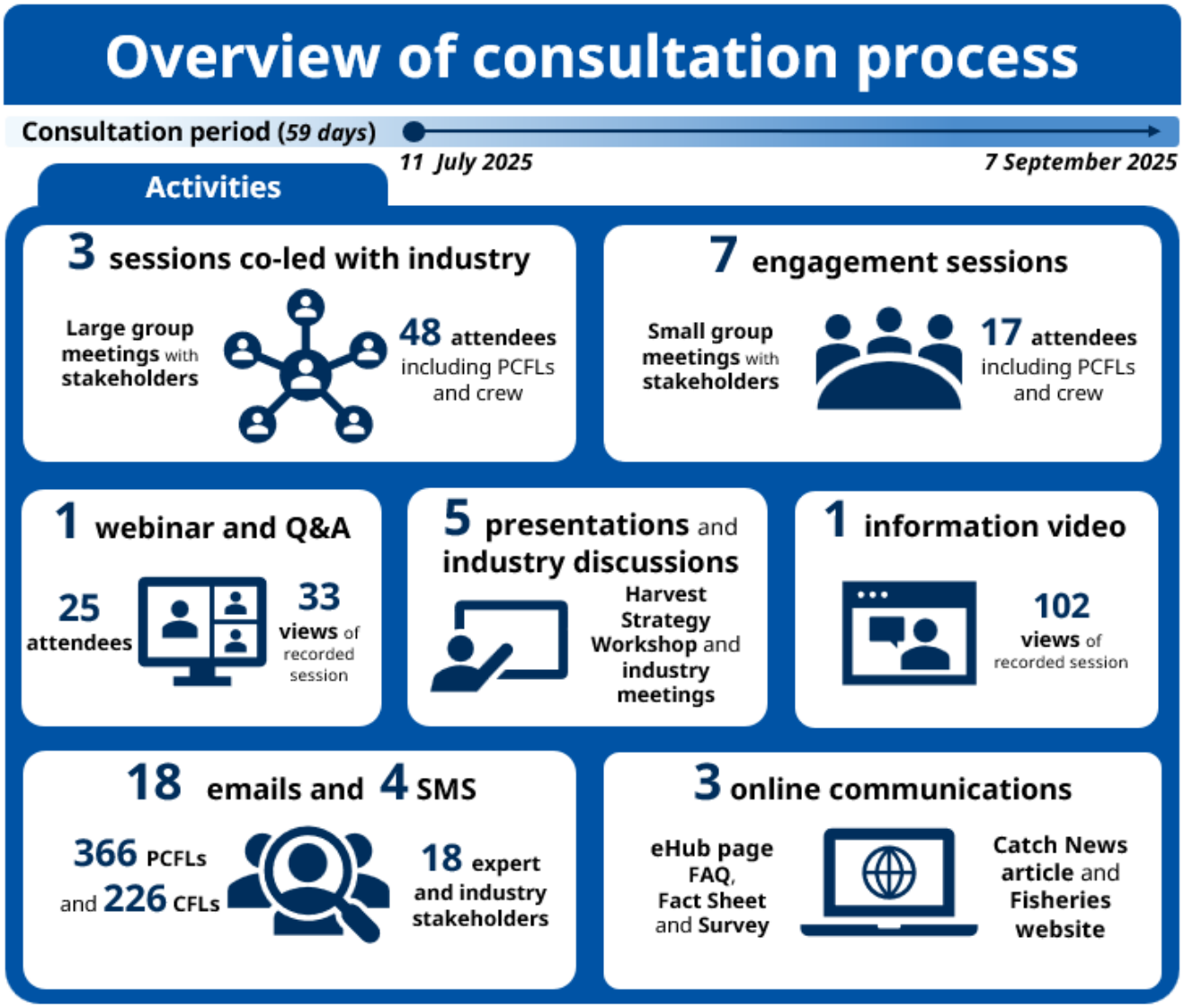
The survey questionnaire conducted as part of the consultation process resulted in a total of 81 participants including commercial fishers, recreational stakeholders, Traditional Owners, environmental groups, and other interested community members. The majority of survey respondents (92.5%) were commercial fishers, reflecting the consultation's primary audience and the sentiment captured in their strong opposition to the proposed 90% effort coverage under an IOM program.

Feedback from this consultation process will be used to inform the development of final options. These final options, along with the result and recommendations from this consultation process, will be incorporated into a Decision IAS. Adjustments to the proposed options will be evaluated to ensure they effectively address stakeholder concerns while meeting Government objectives.

2 Consultation process

Public submission, consultation and engagement activities were undertaken over a 59-day period (8-and-a-half weeks). The Consultation IAS and online survey were released on 11 July 2025, with submissions closing on 7 September 2025.

A range of communication and engagement activities were undertaken to inform stakeholders about the consultation process and to seek feedback on the options presented in the Consultation IAS. The consultation and engagement activities conducted are summarised in the infographic and sections below.



Direct notifications:

- all trawl primary commercial fishing licence (PCFL) holders of the following fishing symbols: T1, T2, M1, M2, and T4, via email and SMS.
- all other potentially impacted PCFL holders via email and SMS.
- all commercial fisher licence holders that had submitted a trawl logbook return within the previous 12 months were notified via SMS.
- members of the Trawl Fishery Working Group via email.
- members of the Sustainable Fisheries Expert Panel notified via email.
- key industry stakeholders directly via email.

Online engagement:

- the "Independent Onboard Monitoring in Queensland Trawl Fisheries" public engagement hub (eHub) page was updated with multiple resources including a survey, videos, Frequently Asked Questions, a summary document, and the full Consultation IAS document.
- a Catch News article was published to all newsletter subscribers to promote the consultation to broader stakeholders.

- the Department of Primary Industries, Fisheries, website was updated to further promote the consultation to broader stakeholders.

Webinar and Q&A Session:

- an online webinar, including a moderated Q&A session, was hosted via Microsoft Teams on 1 August 2025, targeting commercial trawl fishing stakeholders. A recording of the webinar was subsequently published to the eHub page, and commercial trawl fishing stakeholders notified.

Face-to-face engagement:

- presentation to the Southern Inshore Harvest Strategy Workshop, July 2025.
- individual engagement sessions (1-3 participants per session) for trawl PCFLs were held across four major ports: Cairns, Townsville, Mooloolaba, and Brisbane (Shorncliffe) in August 2025. Sessions at other major ports, including Hervey Bay, Bundaberg, Tin Can Bay, and the Gold Coast were offered but were not conducted due to no registered attendance.
- large group, industry-led sessions with trawl stakeholders were conducted in Cairns, Townsville, and Brisbane during August and September 2025. These sessions were organised at the direct request of stakeholders.
- notifications for all engagement and group sessions were sent directly to trawl PCFLs via email, posted on the eHub page, and sent via direct SMS message.

Feedback collection:

- feedback was primarily sought through the online survey posted on the Department's eHub page. However, feedback provided through all other methods (e.g. email, verbal communication, meetings) were also collected and included as part of this report on consultation activities. Both the survey and the other feedback received are summarised and presented separately.
- opportunities were provided at the end of some survey questions for stakeholders to add comments, suggest alternatives, and share viewpoints.

The consultation process was designed to ensure broad participation and to capture both quantitative and qualitative forms of feedback from stakeholders.

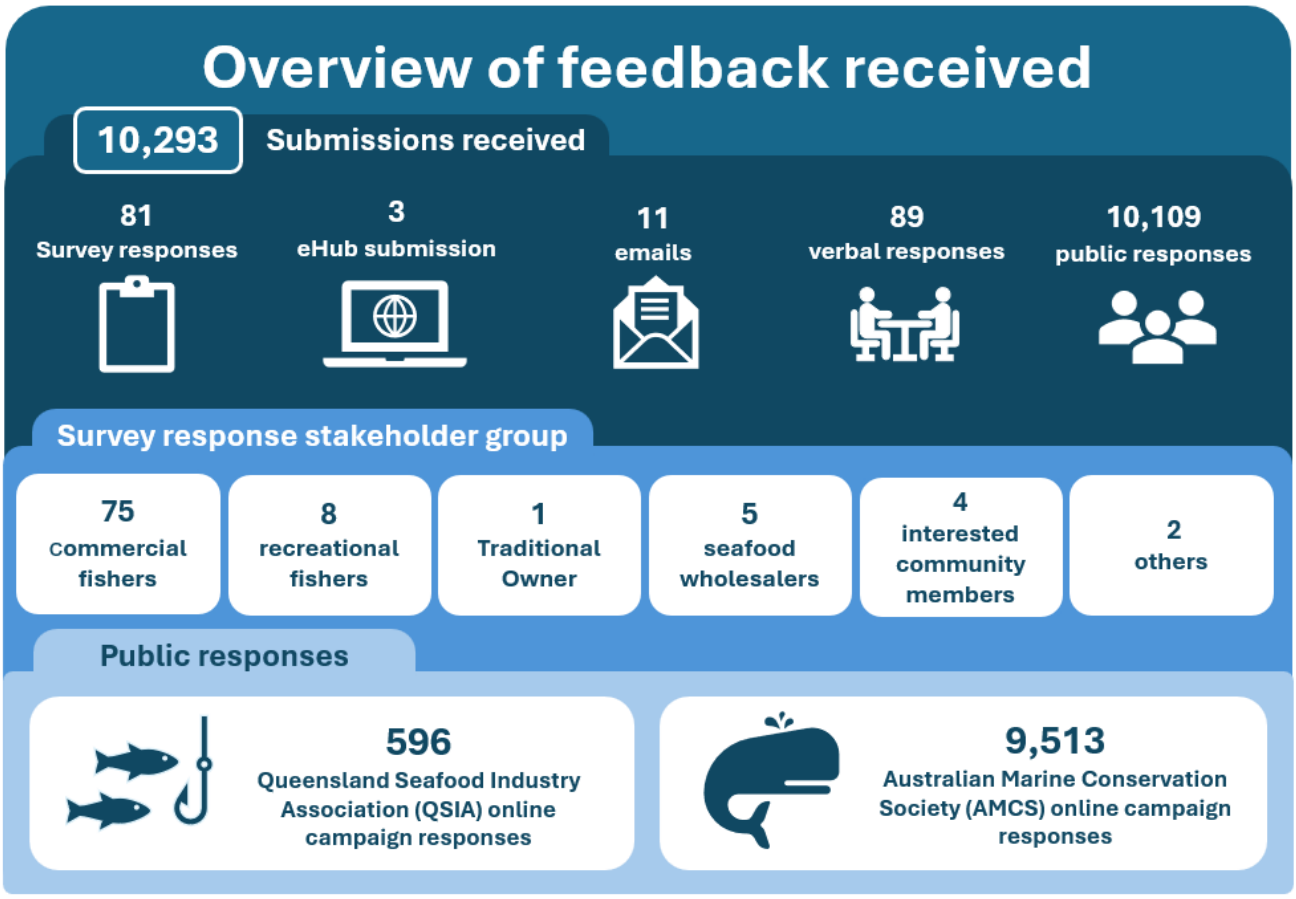
3 Submissions

A total of 10,293 submissions were received during the consultation period, with the majority of this attributed to online campaign submissions from the QSIA and AMCS.

Submissions included 81 survey responses, 14 written submissions and 89 verbal responses from individuals including participants from 14 face-to-face engagement sessions. Included in the written submissions were detailed submissions received from the QSIA, the Central and Northern Zone Entitlement Holders group and a combined submission from AMCS/WWF, along with individual industry stakeholders.

596 endorsements were received for QSIA's online campaign (Appendix 1) and 9,513 endorsements were received for AMCS's online campaign (Appendix 2).

Feedback received is summarised in the information graphics and tables below.



Written feedback

Type of written feedback	Number received
survey responses	81
eHub submission	3
email feedback	11
online campaign responses (QSIA)	596
online campaign responses (AMCS)	9,513
total written responses	**10,204**

Verbal feedback

Engagement type	Sessions	Number of individuals
industry group engagement session	3	48
small engagement session	7	17
phone call	3	3
online webinar and Q&A session	1	21
total number	**14**	**89**

4 Stakeholder feedback

The following sections provide a summary of stakeholder feedback and recommendations received during publication of the Consultation IAS. Survey results are presented first. Feedback received from detailed, verbal and written submissions is also summarised and presented under the relevant survey categories for which they relate.

Note that some care should be taken when interpreting results provided from the survey. Several questions allowed respondents to select more than one option, meaning response numbers and percentages reflect total responses rather than the proportion of individual respondents. Percentages displayed on plots are generally shown to one decimal place, meaning totals are approximately close to 100% but may not equal exactly 100% due to rounding.

Online surveys required all questions to be answered, while paper-based surveys allowed questions to be skipped, resulting in slight variations in total responses for some questions.

Data derived from small sample sizes (fewer than 30 responses), particularly when presented by stakeholder group (most with fewer than 10 respondents), should be interpreted cautiously. These results are not representative of broader stakeholder groups but reflect the views of individuals who chose to respond. As such, findings are indicative rather than conclusive and should be used carefully when drawing broader inferences. Additionally, stakeholders could identify with more than one sector of the fishing industry (e.g., in Question 1).

4.1 Pre-questions (survey demographics)

4.1.1 Survey Results

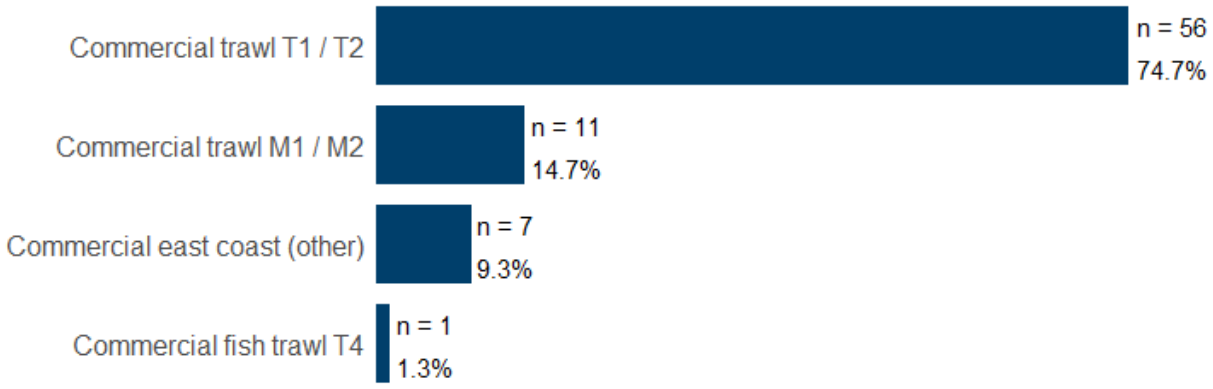
Question 1. What sector of the fishing industry do you represent? (select all that apply)

In total, 81 surveys (including 8 paper surveys and 73 online) were received. Seven stakeholder groups across the fishing industry were represented in the survey, with some overlap due to respondents identifying with multiple roles. The majority (92.6%) identified as commercial fishers, accounting for a total of 75 responses.

Stakeholder group	Number of representatives
Commercial fisher	75
Recreational fisher	8
Traditional fisher / Traditional Owner	1
Seafood wholesaler / marketer	5
Environmental group, industry peak body or other non-government organisation	1
Interested community member	4
Other	1

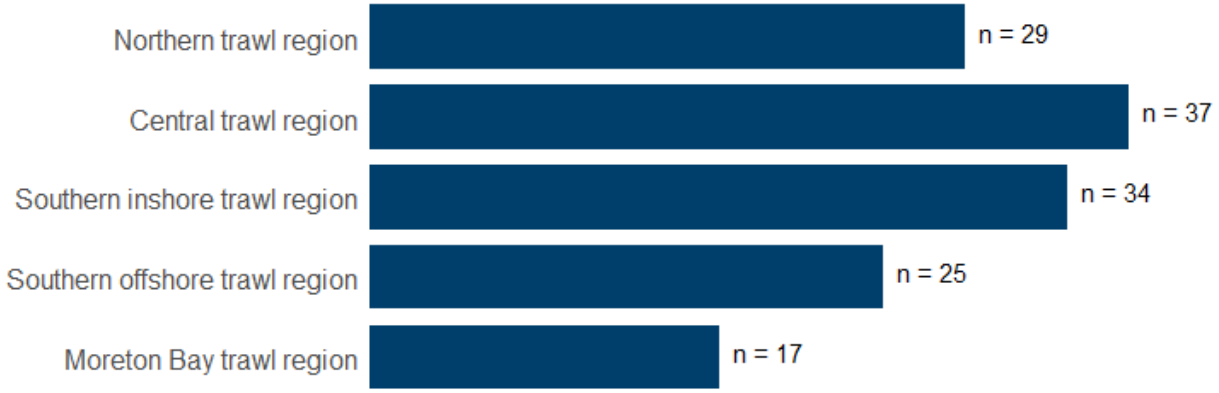
Eight responses were provided by recreational fishers, while four respondents identified as interested community members. One response each came from a Traditional fisher/Traditional Owner, an 'Environmental group, industry peak body, or other non-government organisation', and an 'Other' category. The respondent in the 'Other' category described themselves as representing an 'Other-Government organisation'. No responses were received from charter fishing operators, hospitality workers (e.g., restaurant, café, or fish and chip shop owners/workers), or fishing tackle retailers.

Question 2. If you are a Queensland commercial trawl fisher, which of the following fisheries do you primarily represent?



The majority (74.7%) of commercial fishers who completed the survey were from the T1/T2 trawl sector (56 respondents). The M1/M2 sector, associated with smaller-scale trawling in Moreton Bay, accounted for 11 respondents. Seven identified with other east coast commercial fisheries, and one respondent represented the east coast fish trawl sector (T4).

Question 3. If you are a Queensland commercial east coast otter trawl fisher, which region(s) do you regularly/primarily fish?



Queensland commercial east coast otter trawl fishers who participated in the survey identified the regions they regularly or primarily fish. The central trawl region was the most commonly fished area, with 37 respondents identifying it as a primary region, followed by the southern inshore trawl region (34 respondents). The northern trawl region was selected by 29 respondents, while the southern offshore trawl region and Moreton Bay trawl region were identified by 25 and 17 respondents, respectively.

4.1.2 General submissions

General submissions were also received. The majority of these were received from representatives of the commerical fishing sector, including the QSIA, the Central and Northern Zone Entitelement Holders group and other individual commercial fishers. A general submission was also received from AMCS/WWF.

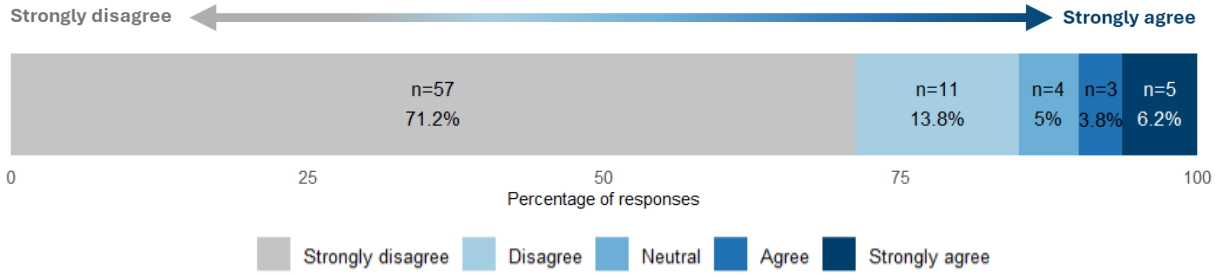
Online campaigns by QSIA and AMCS/WWF received endorsements from a wide range of stakeholders both nationally and internationally. Due to the submission types and information received from these campagins, it was not possible to determine the demographics of persons that responded.

4.2 General feedback

4.2.1 Survey Results

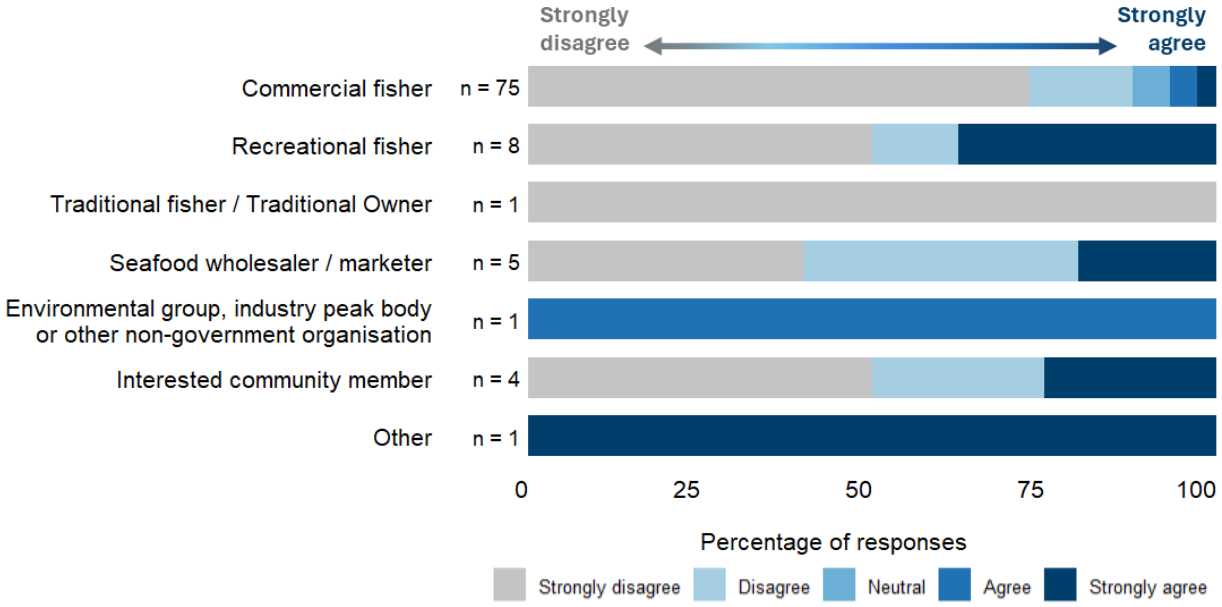
Question 4. Do you agree with the need for improved monitoring and independent validation of commercial fishing data?

All survey respondents



The majority of respondents opposed the need for improved monitoring and independent validation of commercial fishing data, with 68 respondents (85%) either strongly disagreeing or disagreeing. In contrast, a small minority supported the need, with eight respondents (10%) either agreeing or strongly agreeing. The remaining four respondents (5%) were neutral, neither supporting nor opposing the need for improved monitoring and independent validation of commercial fishing data.

By stakeholder group

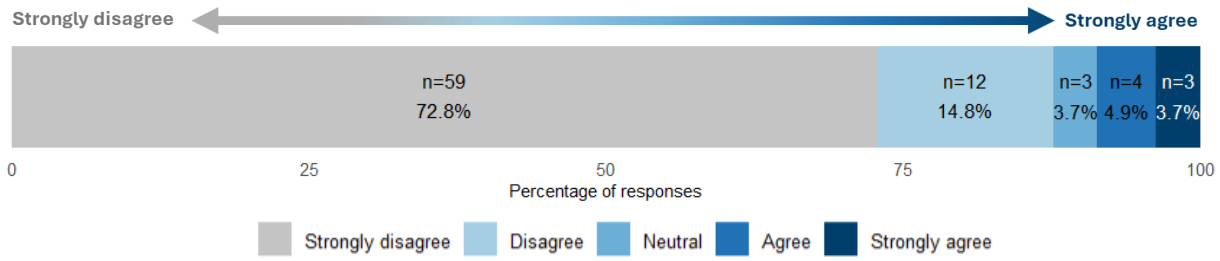


Responses varied across stakeholder groups, with some overlap in the sector groups for each person likely influencing the results. Among commercial fishers, the majority disagreed, with only a few selecting neutral or agreeing. This group included all seafood wholesalers/marketers, whose responses were more evenly distributed compared to commercial fishers.

Recreational fishers were more divided, with approximately two-thirds disagreeing or strongly disagreeing (n=5), while the remaining third strongly agreed (n=3). Notably, three recreational fishers also identified as commercial fishers, all of whom strongly disagreed. The respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher also strongly disagreed.

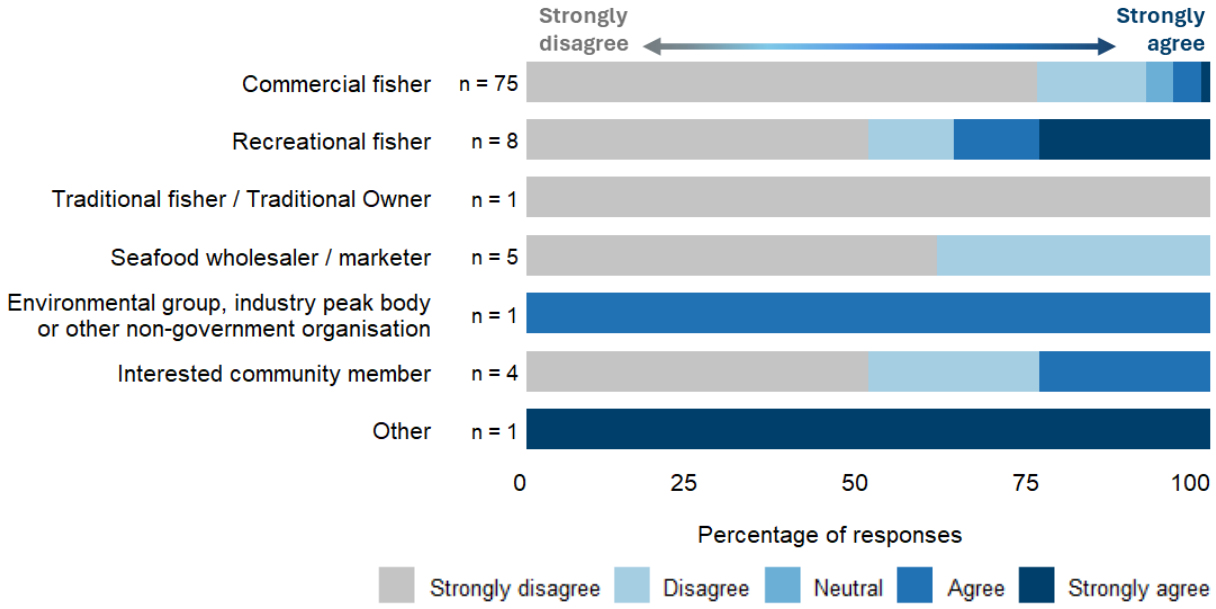
Question 5. Do you agree with the proposal to establish an independent onboard monitoring (IOM) program across the east coast otter trawl fishery and commercial fin fish trawl fishery that uses e-monitoring systems?

All survey respondents



The results showed that the majority of people surveyed opposed the proposal for establishing an IOM program using e-monitoring systems. The majority of respondents (72.8%) strongly disagreed or disagreed (14.8%). Only a small proportion of respondents were neutral (3.7%), while 8.6% either agreed or strongly agreed.

By stakeholder group

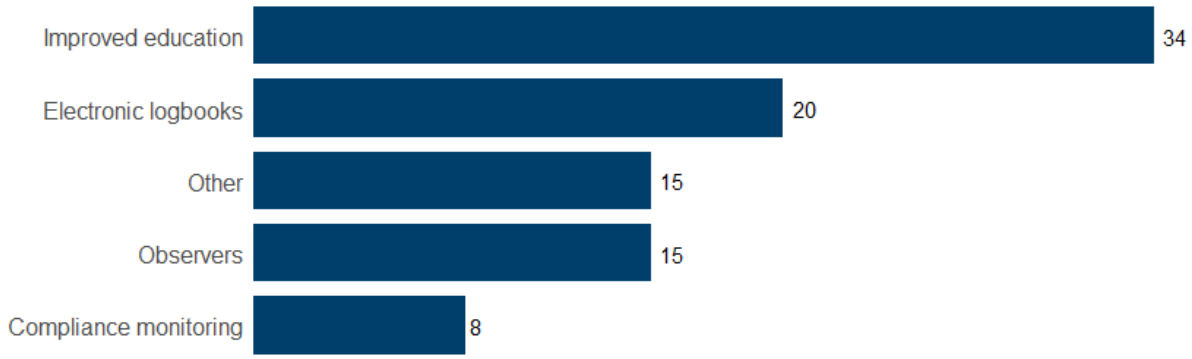


Responses to the proposal for establishing an IOM program varied across stakeholder groups. The majority of commercial fishers expressed strong disagreement. This group again included all five seafood wholesalers/marketers, all of whom disagreed with the proposed program.

Recreational fishers were more divided, with approximately one third expressing a level of agreement (n=3) and two thirds expressing disagreement (n=5). Notably, three of the five recreational fishers who disagreed also identified as commercial fishers. The respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher strongly disagreed.

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

All survey respondents



Survey respondents indicated their preference for additional monitoring or independent validations methods and were also invited to provide alternative suggestions. Respondents were able to select multiple options, and the numbers provided represent the total number of responses for each method. Three respondents did not select any methods.

Improved education was the most frequently selected method (n=34). Electronic logbooks were the next most popular method chosen (n=20), while observers (n=15) and compliance monitoring (n=8) received comparatively fewer selections. Notably, all survey respondents who selected the observer method were commercial fishers.

Suggestions provided for 'Other' suitable methods (n = 15) included improved bycatch reduction devices (BRDs), utilisation of drone techonology, fisheries-independent Threatened, Endangered, and Protected (TEP) species monitoring surveys, and the use of electronic monitoring systems that have already been purchased by fishers (ie. CCTV). An optional buyout of licences was also mentioned in responses.

By stakeholder group

The breakdown of selections by sector are provided in the table below.

Stakeholder group	Commercial fisher	Recreational fisher	Traditional fisher	Seafood wholesaler/ marketer	Environmental group*	Interested community member	Other
Improved education	30	6		2		4	1
Electronic logbooks	16	4		1	1	2	
Other	13	2	1	2	1	1	1
Observers	15						
Compliance monitoring	7	1		1		1	

* Note: full name for this group is 'Environmental, industry peak body or other non-government organisation'

4.2.2 General submissions

The table below summarises feedback from QSIA, AMCS/WWF and other industry stakeholders/groups that related to the '*General feedback*' survey questions (Questions 4 – 6).

Feedback from QSIA

QSIA's submission acknowledged the need for improved independent validation of TEP species interactions to meet Commonwealth Government expectations, such as export approvals, however, did not support the proposed IOM program as the most viable or best outcome option.

Their submission recommended alternative options that could better support improved validation or better data, including existing logbook, fishery observers, protected species management plans, improved education, electronic reporting and more targeted monitoring or 'checks'.

While their submission did not support the IOM program proposed in the consultation-IAS, it recommended that a co-management or industry owned model should be considered. Such a model was recommended where industry own the data, which would better ensure their key issues and views would be considered in final program design.

Their submission also noted concerns with scope creep of a future IOM program, where the e-monitoring systems may be used for more than what they were originally implemented for (i.e. expanding program scope beyond TEP species validation).

Feedback from other commercial fishing stakeholders and groups

Submissions received from commercial fishers generally opposed the need for electronic monitoring and the use of cameras to independently validate TEP species interactions. Feedback generally stated that the fishery is already well-managed and sustainable. Some submissions stated that there is no need for improved validation as current levels of TEP species interactions are low and the existing use of exclusion devices like turtle exclusion devices (TEDs) and BRDs further reduce incidental capture and interactions with TEP species.

Fishers recommended alternative approaches such as better training for skippers and crew, simplifying reporting requirements, and the use of onboard observers.

A few fishers felt that the program was more about social licence and public perception than addressing genuine management or environmental concerns.

Feedback from AMCS/WWF

The joint submission from AMCS and WWF strongly supported the proposal to implement IOM in the ECOTF and the CFFTF. They emphasised a current lack of independent and verifiable data on TEP species interactions as a critical gap and raised concerns that mandatory reporting of TEP species interactions is widely believed to be significantly under-reported.

Their submission considered validated data to be essential for effective fisheries management and meeting external obligations, such as commonwealth export conditions, United Nations Educational, Scientific and Cultural Organization (UNESCO) recommendations, and the Reef 2050 Plan. They noted that e-monitoring systems have been shown to improve fisher behaviour and reporting accuracy, helping to address under-reporting of TEP species interactions.

Their submission stressed that accurate data on TEP species interactions is critical to assessing population-level impacts on vulnerable species and ensuring that fishing practices do not compromise their survival. Increasing transparency of fishing impacts on TEP species and the environment was also highlighted as critical to improving the social licence of the fishery and community confidence.

Their submission supported the options analysis that was presented, agreeing that the use of e-monitoring systems was the most viable option. They also identified other options, including Crew-Member Observer programs and voluntary or industry led/owned programs, as not viable.

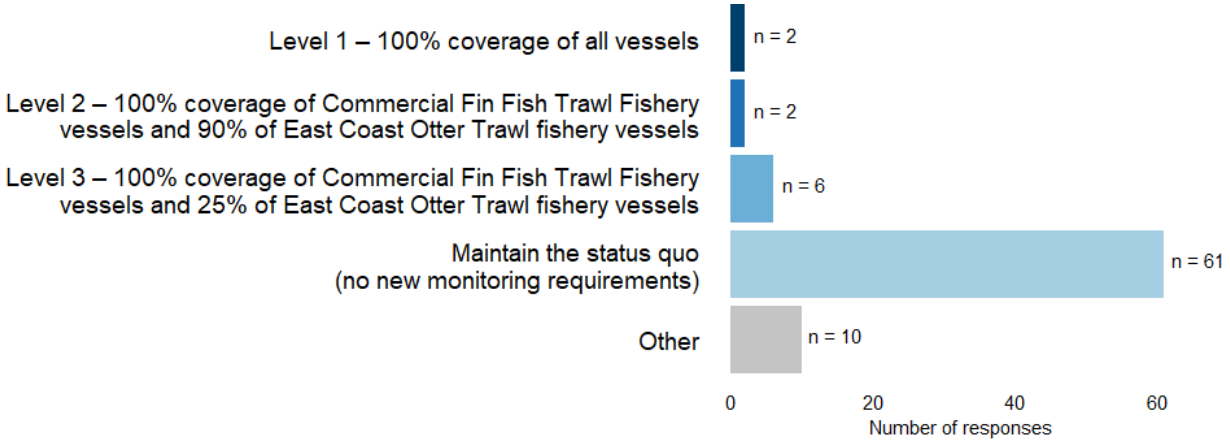
Public support was also noted in the submission, referencing a YouGov poll showing that 70% of respondents supported the introduction of cameras across the trawl fleet.

4.3 IOM program options

4.3.1 Survey results

Question 7. What level of vessel coverage do you think an IOM program should have?

All survey respondents



When asked about the preferred level of vessel coverage for an IOM program, most respondents supported maintaining the status quo (n=61, 75%) with no new monitoring requirements. A small number of respondents selected the highest levels of coverage, Level 1, 100% of vessels (n=2), or Level 2 at 90% of ECOTF vessels (n=2). Level 3, proposing 25% coverage of ECOTF vessels, received the most responses above the status quo (n=6), though this was still a small number of responses (n=6). Additionally, ten respondents only selected "other" and provided comments instead. Common suggestions included less than 25% vessels in the ECOTF but above the status quo. Another suggestion called for implementation on vessels that export only.

By stakeholder group

Stakeholder group	Commercial fisher	Recreational fisher	Traditional fisher	Seafood wholesaler/ marketer	Environmental group*	Interested community member	Other
Level 1		2					1
Level 2	1	1				1	
Level 3	6						
Status quo	59	4	1	3		2	
Other	9	1		2	1	1	

* Note: full name for this group is 'Environmental, industry peak body or other non-government organisation'

Commercial fishers generally preferred the option to maintain the status quo (73%). Respondents who selected higher levels of IOM coverage were more likely to be recreational fishers than any other stakeholder group. Most stakeholder groups had at least one respondent who preferred maintaining the status quo with no additional monitoring requirements. Since some respondents identify with multiple sector interests, the total number of selections in the table reflects the preferences of stakeholder groups rather than being limited to individuals.

4.3.2 General submissions

The table below summarises feedback from QSIA, AMCS/WWF and other industry stakeholders, that related to the '*Independent onboard monitoring program options*' survey question (Question 7).

Feedback from QSIA

QSIA's submission did not provide a recommended level of vessel coverage, instead stating that further discussions with industry should be held before confirming, with there being conflicting views across industry on how vessels could be prioritised and why.

Their submission raised the question that the consultation-IAS did not explain how the recommended options would ensure adequate validation of TEP information is achieved in order to meet commonwealth expectations, such as those under export approvals.

They questioned why blanket IOM (i.e. e-monitoring systems across a high percentage of active vessels) is necessary to support a program that is representative and risk-based, when there is limited data currently available to support this statement/assumption.

Feedback from other commercial fishing stakeholders and groups

Whilst the majority of fishers preferred the option of doing nothing with no implementation of IOM, some fishers recognised the need to do something to address the requirements of commonwealth export conditions, and some supported the introduction of IOM.

It was suggested by some fishers that mandating IOM on vessels without hoppers may not be practical, as they believe cameras are unable to effectively monitor TEP species interactions and bycatch on vessels using sorting trays. Some submissions also suggested e-monitoring systems should only be implemented once hoppers have been established across the entire fleet.

Feedback from AMCS/WWF

The submission from AMCS/WWF provided a recommendation for 100% coverage of all active vessels across the ECOTF and CFFTF, explaining the 100% coverage was required in order to meet program objectives and external obligations. Excluding active vessels was noted as a risk, as it may allow vessels without cameras to avoid scrutiny, potentially leading to less sustainable fishing practices and limiting the widespread adoption of behaviour change across the fleet.

Their submission noted that fishing effort is not the only driver, or risk, for TEP species interactions, outlining several other influences including fishing location, gear, fisher behaviour and seasonality. Their submission raised concerns with the 90% option, creating an effort threshold where vessels that represent a risk of interacting with TEP species could continue to operate without validation of their interactions.

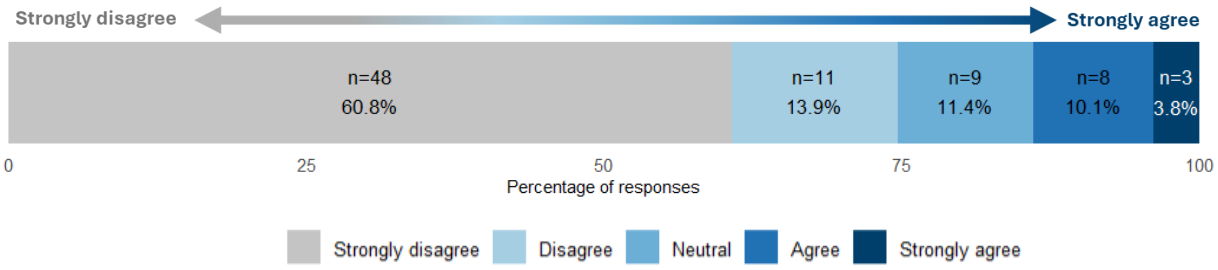
They noted that inactive vessels should remain out of scope, however, included if they become active.

4.4 Implementation and rollout

4.4.1 Survey results

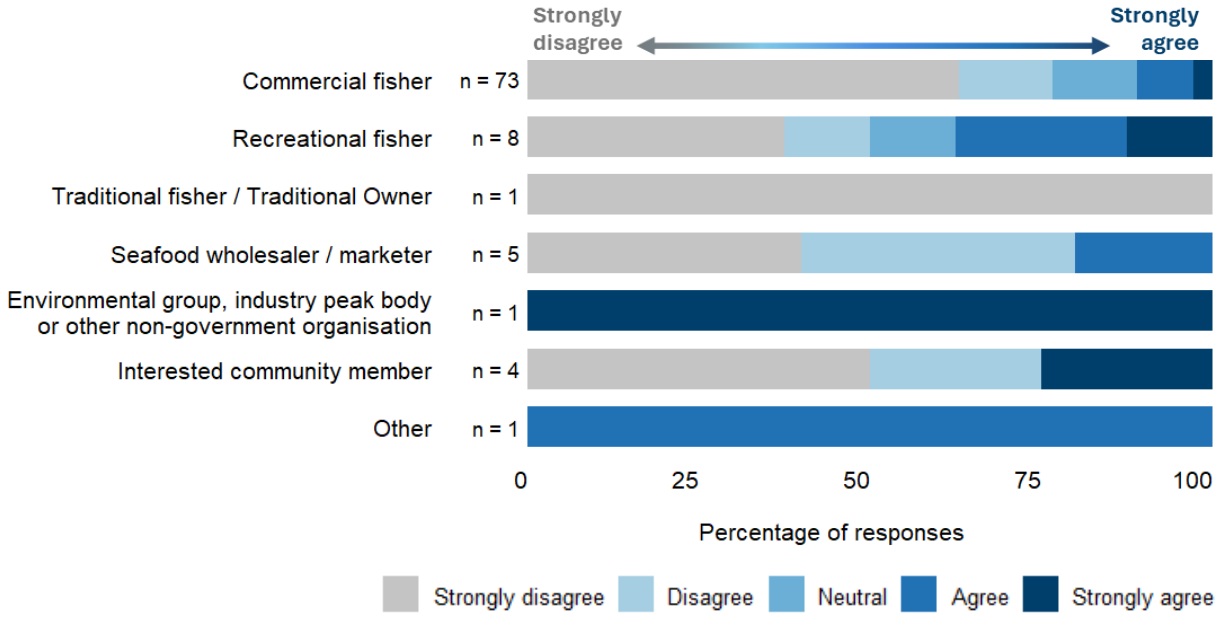
Question 8. Do you agree with a risk-based approach to the implementation of IOM across priority vessels from the northern, central, southern inshore and southern offshore management regions of the east coast otter trawl fishery?

All survey respondents



The majority of respondents opposed the adoption of a risk-based approach to implementing IOM. Strong disagreement was the most common response, with 60.8% strongly disagreeing and a further 13.9% disagreeing. Neutral responses made up 11.4%, while 10% agreed, and only 3.8% strongly agreed.

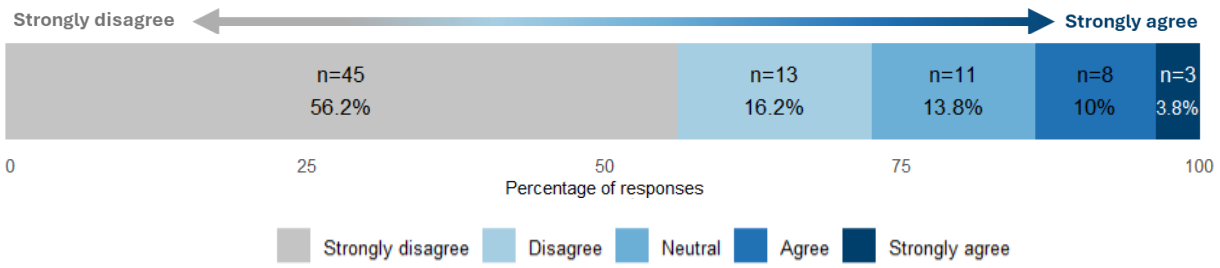
By stakeholder group



Responses to the proposal for establishing a risk-based approach to implementing IOM varied across stakeholder groups. Among commercial fishers, the majority expressed strong disagreement or disagreement. Recreational fishers were more divided, half expressing disagreement of some extent (n=4) and the other half expressing neutrality or agreement (n=4). This may be due to high representation of recreational fishers that also identified themselves as commercial fishers. The respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher strongly disagreed.

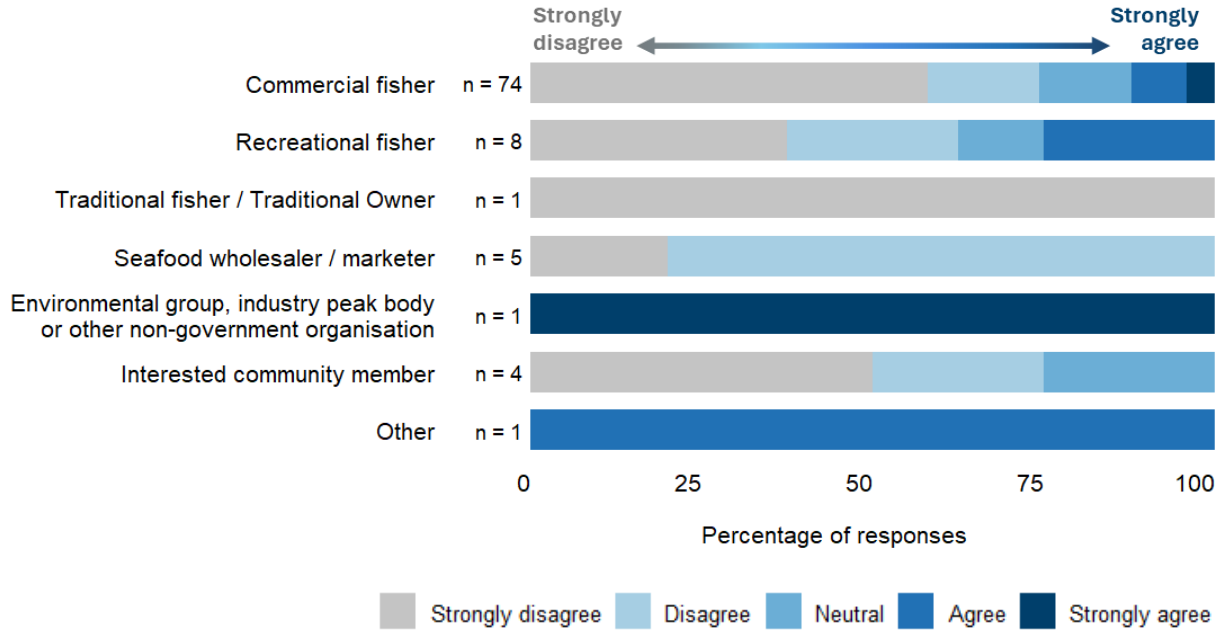
Question 9. Do you agree with the staged implementation of IOM across vessels that represent the highest fishing effort within each management region?

All survey respondents



Most survey respondents opposed the staged implementation of an IOM program based on the highest fishing effort within each management region, with 56.2% strongly disagreeing and 16.2% disagreeing. Neutral responses made up 13.8%, while 10% agreed, and only 3.8% strongly agreed.

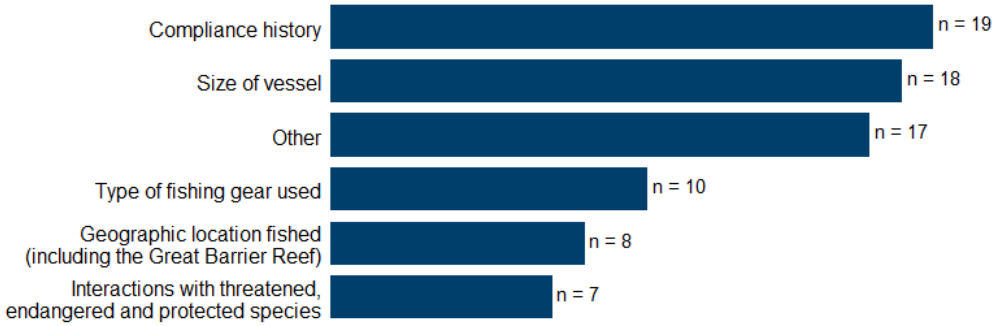
By stakeholder group



Responses to the proposal for the staged implementation of an IOM program based on the highest fishing effort within each management region, varied across stakeholder groups. Among commercial fishers, the majority expressed strong disagreement. Recreational fishers remained divided on this question, the majority expressing disagreement (n=5) and the others expressing neutrality or agreement (n=3). As in the previous survey questions, three of the five recreational fishers who disagreed also identified as commercial fishers. Also, the respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher once again strongly disagreed.

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

All survey respondents



Respondents were asked to select criteria that should support the implementation of IOM, with multiple selections allowed. Compliance history and size of vessel were the most selected. Type of fishing gear used, location fished, and interactions with TEP species were also common selections. Other criteria suggested by respondents included:

- risk level of TEP species – prioritising the highest-risk species (e.g. those identified in the Southern Offshore Region Ecological Risk Assessment and sawfish interaction areas in ECOTF and CFFTF) before monitoring low-risk TEP species.
- reporting history – considering whether vessels have consistently reported TEP species.
- exemptions for small vessels – several fishers proposed exempting vessels under 10m because of their smaller gear and shorter fishing shots.
- safety concerns – noting that IOM equipment may draw essential onboard power.
- unsustainable fishing practices – targeting vessels with poor practices (although respondents noted these are not typical in the relevant fisheries).
- structural adjustment buy-back schemes.
- further education for skippers and crew.
- effort history, with a preference for measuring effort in effort-units rather than nights to better reflect actual fishing activity.

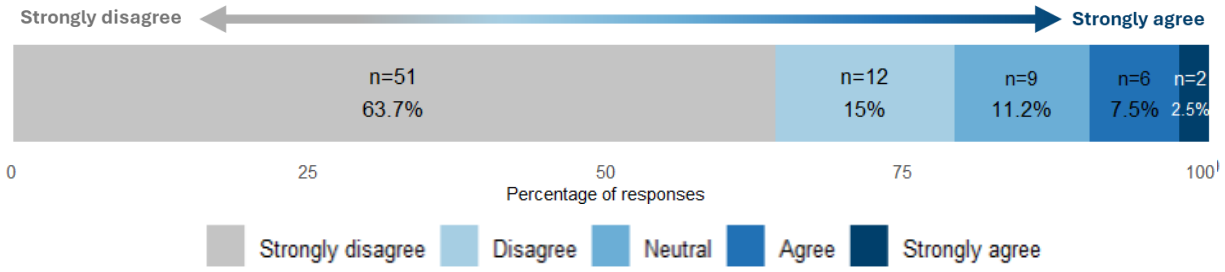
By stakeholder group

The responses by stakeholder group are provided below.

Stakeholder group	Commercial fisher	Recreational fisher	Traditional fisher	Seafood wholesaler/ marketer	Environmental group*	Interested community member	Other
Compliance history	14	6				2	1
Size of vessel	17	1		2			1
Other	15	1	1	2	1	3	
Type of fishing gear used	8	4		1			1
Geographic location fished	5	3			1	1	1
Interactions with TEP species	4	3			1	1	1

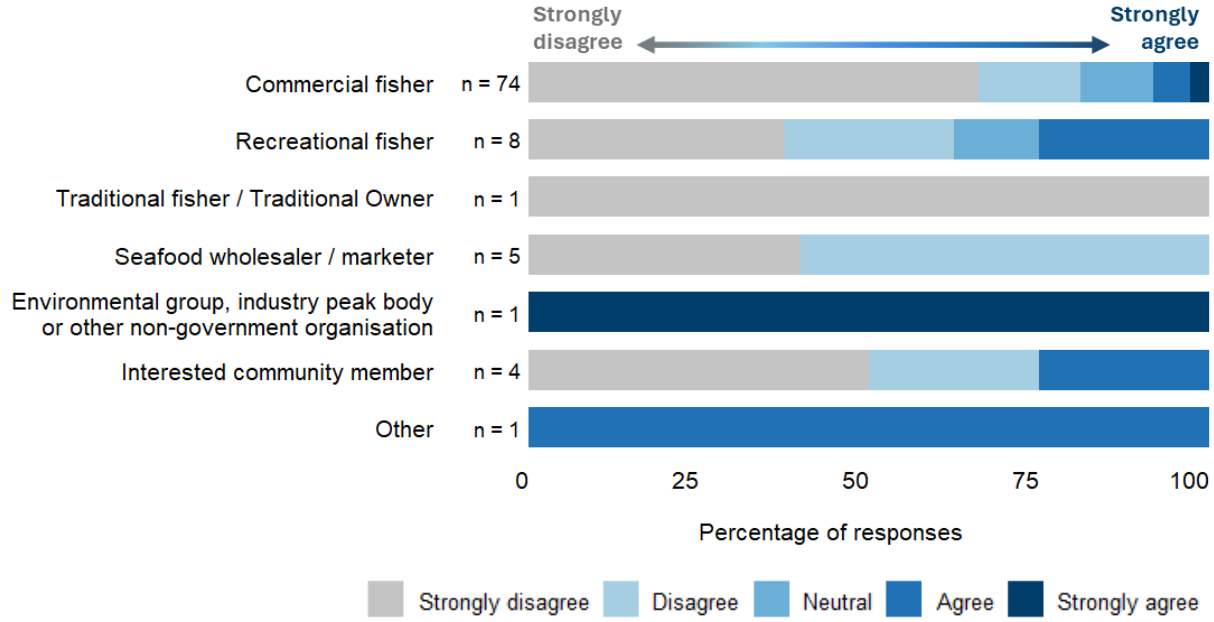
Question 11. Do you agree with the staged implementation of IOM over 4 years?

All survey respondents



Most respondents opposed the staged implementation of IOM over four years, with 63.7% strongly disagreeing and 15% disagreeing. Neutral responses accounted for 11.2%, while 7.5% agreed, and only 2.5% strongly agreed.

By stakeholder group

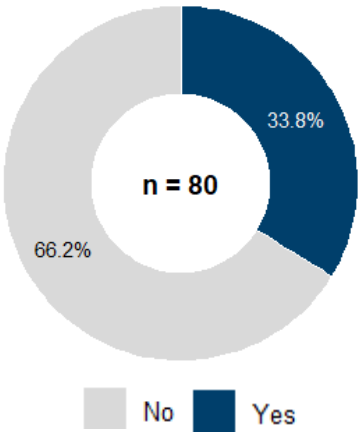


Responses to the question on the staged implementation of the IOM over four years, varied across stakeholder groups. Among commercial fishers, the majority strongly disagreed or disagreed. Recreational fishers remained divided, the majority disagreeing and the others were neutral or agreeing. As in the previous questions, three of the five recreational fishers who disagreed were also commercial fishers. The respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher strongly disagreed.

Question 12. Should any other criteria or implementation timeframes be considered in the rollout of an IOM program?

All survey respondents

33.8 % of respondents indicated there are other criteria or implementation timeframes that should be considered.



Suggestions on how to prioritise implementation included prioritising:

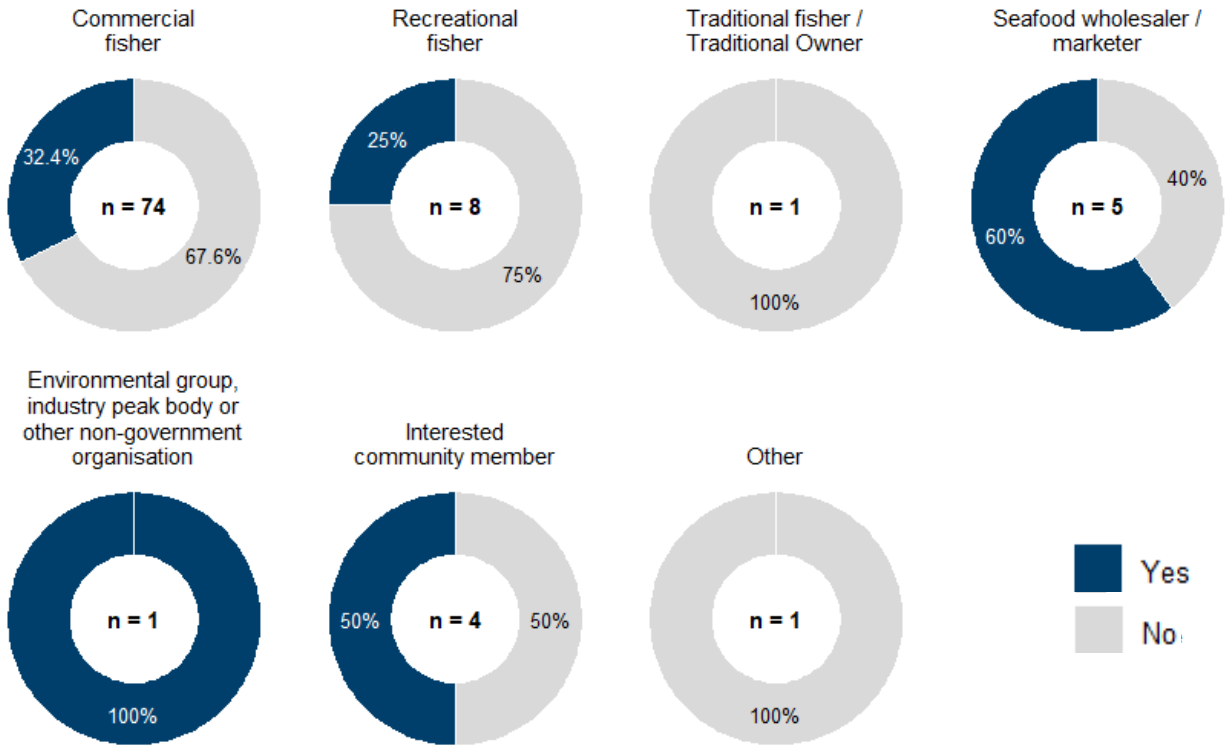
- locations where high-risk protected species occur (ie. such as sawfish)
- fishers that haven't reported TEP interactions before
- fishers that are currently reporting TEP interactions
- larger boats, such as boats with hopper and conveyor systems and auxiliary engines
- boats with ample crew to ensure there are no impacts of the program on safety
- deprioritising vessels under "grandfather clauses".

Broader suggestions on program implementation included:

- using effort units instead of nights fished for a fairer distribution of cost recovery
- considering AI to improve timeframes and reduce costs
- considering historical and current biomass levels of target species and their impact on TEP species.

By stakeholder group

Respondents from most stakeholder groups indicated that other criteria or implementation timeframes should be considered. Commercial fishers suggested implementation prioritsation based on effort, risk and vessel size. Recreational fishers commented on fisher safety and broader ecological considerations.



4.4.2 General submissions

The table below summarises feedback from QSIA, AMCS/WWF and other industry stakeholders that related to the '*Implementation and rollout*' survey questions (Questions 8 – 12).

Feedback from QSIA

QSIA's submission raised concerns that the proposed implementation timeline of four-years was too ambitious in speed and scale. They noted learnings from the onboard camera field trial, where several hardware issues were encountered, and stated that adequate time during broader implementation would be required to troubleshoot and refine expected issues.

Concerns were also raised with the technical and logistical challenges of installing large numbers of cameras across the fisheries' major and remote fishing ports, as well as the challenges faced by industry with adopting new technology at such a fast pace.

Their submission agreed that it was appropriate to undertake a risk-based and staged approach to implementation of a future program but recommended alternative ways this could be better achieved. Their submission suggested that 'risk' is more complex than just spatial effort and highlighted uncertainties around what level of implementation would deliver a program that is 'representative' and effectively addresses unknown 'risks' to TEP species. Concerns were raised about the potential for biased or skewed data if implementation focuses solely on high-risk regions or high-effort vessels, suggesting a random selection method to ensure representative coverage across regions, effort levels, and risk profiles.

Their submission recommended that implementation of a program should focus on a co-management model, adopting a phased approach commencing with volunteers who are financially compensated, and only expanding based on milestone reviews. It was recommended that ongoing reviews of implementation should be undertaken each quarter to report on rollout timelines, validation against TEP reporting, technical performance and overall progress, and that expansion of the program should only occur when review outcomes demonstrate that its justified.

Feedback from other commercial fishing stakeholders and groups

Feedback from commercial fishing stakeholders and groups identified a number of concerns and practical considerations in the implementation of IOM.

Some fishers noted the importance of an equitable rollout methodology and suggested use of a lottery system, with 25% of vessels participating at any given time over an 8-year period. Other fishers suggested to focus on targeted monitoring for high-risk vessels or regions, rather than blanket coverage.

Some suggestions included allowing fishers to purchase and manage their own approved camera systems to reduce costs and improve flexibility.

Vessel size was suggested as an important consideration, with fishers identifying that smaller vessels (under 10m) and/or those that complete short shot durations, pose a lower risk to protected species and should be exempt from mandatory camera requirements.

They raised concerns with the management of a program across jurisdictions, and with the proposed prioritisation method for vessels and regions.

Some fishers questioned the fairness of using historical effort data to determine which vessels receive cameras first, as it may not accurately reflect current fishing practices or risks to TEP species. Considerations of regional characteristics, such as fishing gear types, compliance history, and TEP interaction risks, were recommended by fishers when determining implementation priorities.

Feedback from AMCS/WWF

The submission from AMCS/WWF raised concerns around the timeframes for implementation, noting the slow progress in rollout to date and the proposed rollout of four years as insufficient to obtain robust and

accurate data on TEP interactions. They instead recommended the completion of an IOM program rollout within two and a half years (by December 2028).

The submission supported the concept of risk-based staged implementation of IOM in the ECOTF, arguing that risk is not strongly influenced by number of fishing days, but is more influenced by factors such as fishing location, gear type, fisher behaviour and skill, and seasonality. However, prioritising IOM installation based on fishing effort (e.g., days fished) was supported in the submission to capture the most active vessels first and maximise early data collection.

Concerns were raised about inequities in program implementation, such as excluding some vessels, which could create compliance disparities and undermine industry morale. They recommended ensuring all active vessels are included in the program to address inequity and avoid compliance disparities between operators. Additionally, they recommended incorporating new entrants to the fishery and vessels increasing their fishing effort in the program to prevent gaps in monitoring and compliance.

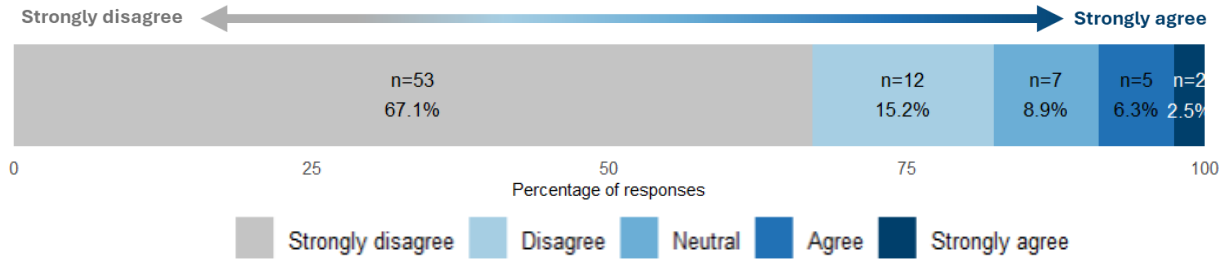
The submission supported the prioritisation of regions with overlap of the Great Barrier Reef World Heritage Area (GBRMHA) and also recommended to avoid relying on historic TEP species interaction data for prioritisation due to uncertainties in the dataset.

4.5 Objectives and design

4.5.1 Survey results

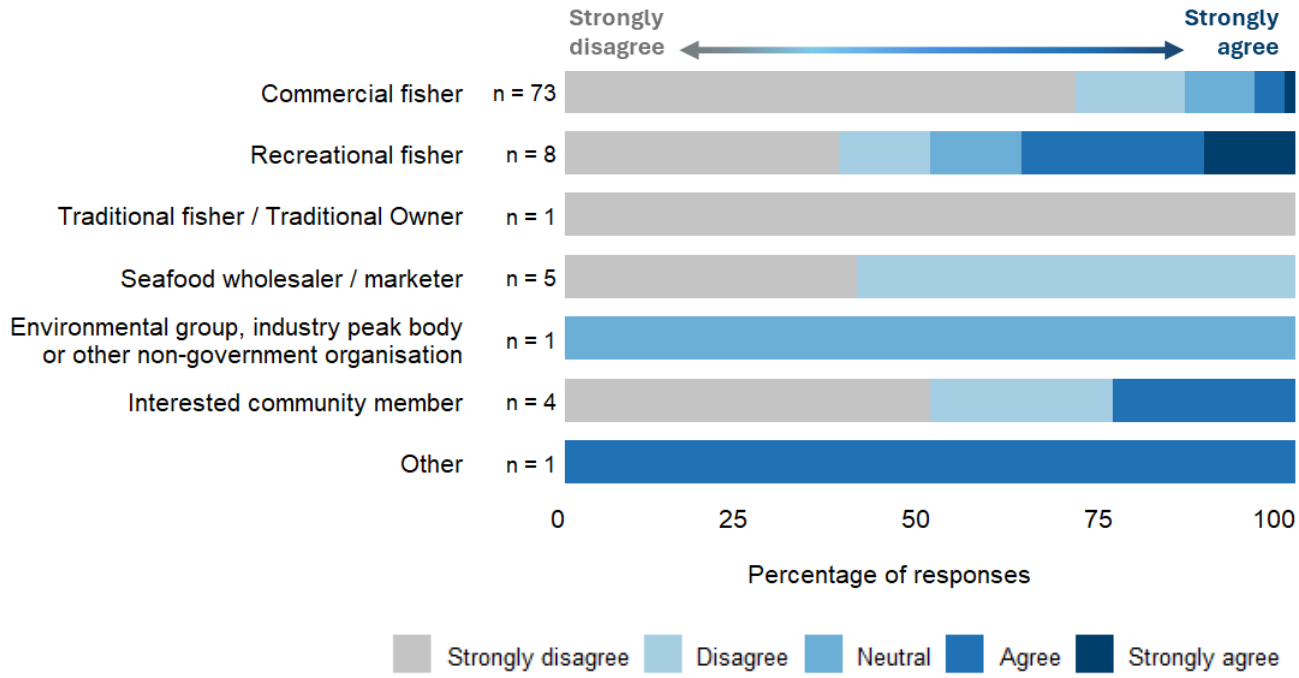
Question 13. Do you agree with the draft IOM program objectives?

All survey respondents



The majority of respondents opposed the draft objectives of an IOM program, either strongly disagreeing (67.1%) or disagreeing (15.2%). Neutral responses accounted for 8.9%, while 6.3% agreed and 2.5% strongly agreed.

By stakeholder group



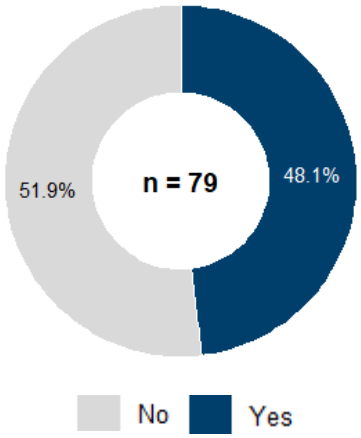
Responses relating to the draft IOM program objectives, varied across stakeholder groups. Most commercial fishers expressed some level of disagreement. Recreational fishers were divided, with half expressing a level of disagreement and the other half expressing neutrality or agreement to some extent. Two of the four recreational fishers who disagreed were also commercial fishers. The respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher strongly disagreed.

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

All survey respondents

48.1% of respondents identified that there were other objectives that an IOM program should consider.

Suggestions on what changes should be made to program objectives included additional consideration for:

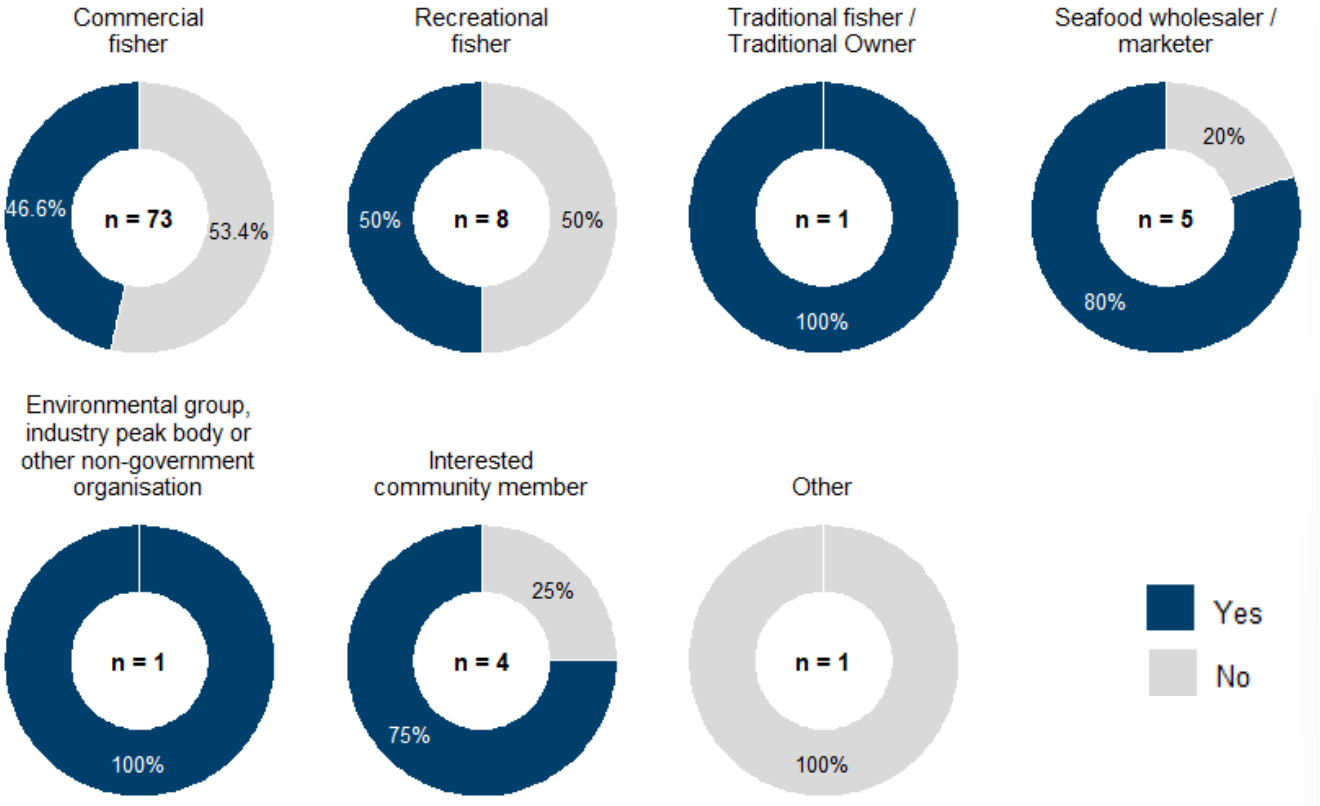


- the variation in fishing effort between management regions and between vessel sizes
- program flexibility to allow for changes to program objectives over the four-year implementation period
- an optional buyout of licences
- the removal of bycatch considerations in the program scope
- improved education for fishers, specifically regarding species identification
- inclusion of an onboard observer program.

By stakeholder group

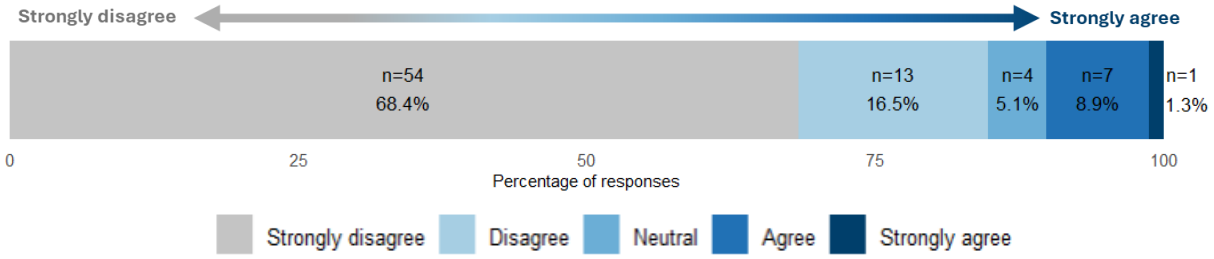
Respondents from most stakeholder groups indicated changes to the IOM program should be made. Recreational fishers commented on prioritising flexibility over the four-year implementation period.

Commercial fishers suggested reducing the IOM scope through the level of coverage and the removal of bycatch considerations, use of an onboard observer program, and an optional buy out of licences.



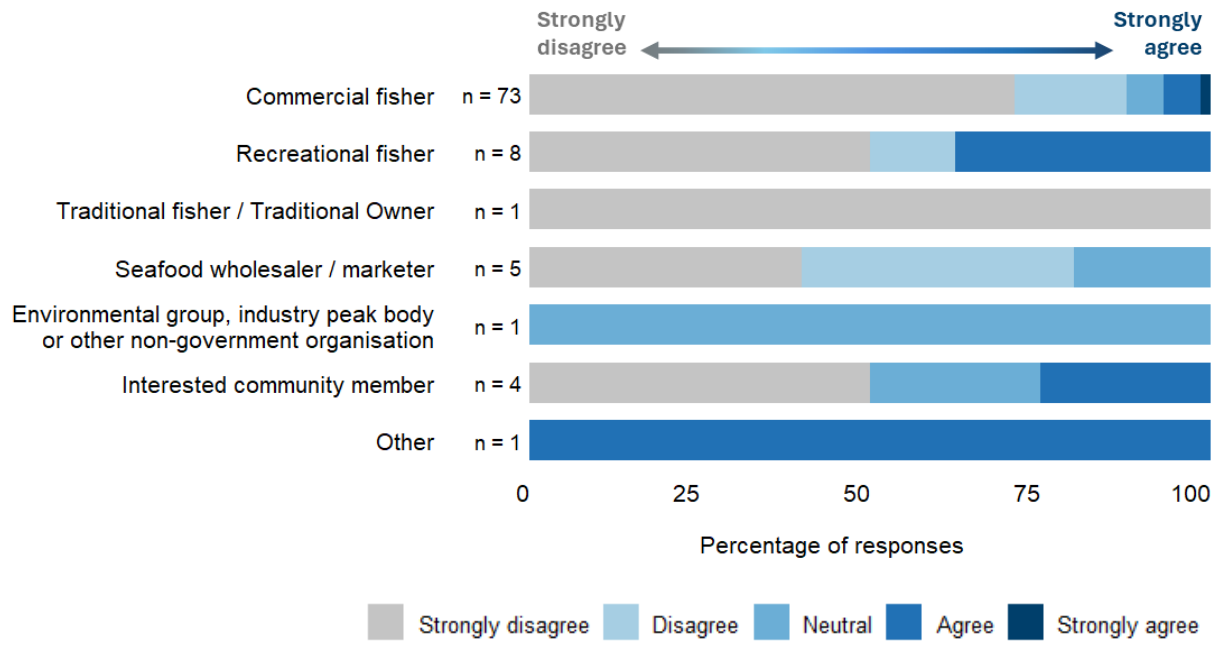
Question 15. Do you agree with the proposed responsibilities of government and licence holders to support delivery of an IOM program?

All survey respondents



Most respondents opposed the proposed responsibilities of Government and licence holders to support the delivery of an IOM program, with 68.4% strongly disagreeing and 16.5% disagreeing. Neutral responses received were 5.1%. A small group of respondents agreed (8.9%) or strongly agreed (1.3%) with the proposed responsbilities.

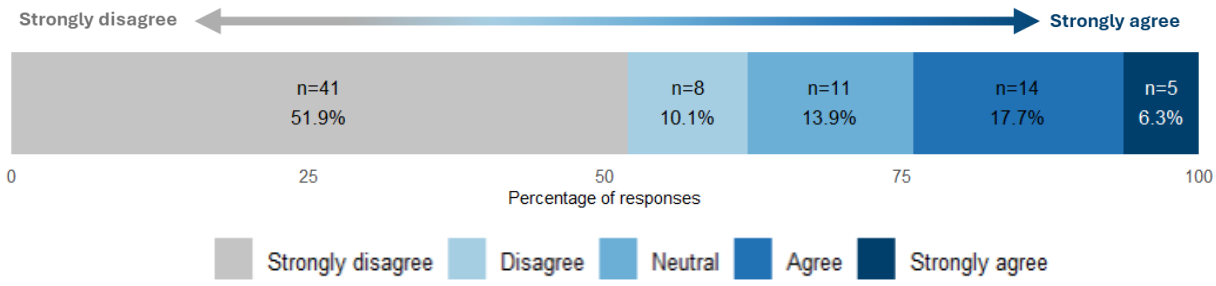
By stakeholder group



Responses to the proposed responsibilities of government and licence holders to support the delivery of an IOM program, varied across stakeholder groups. Among commercial fishers, the majority expressed strong disagreement. Recreational fishers were divided, with half strongly disagreeing, one expressing disagreement, and three expressing agreement. Notably, two of the four recreational fishers who disagreed also identified as commercial fishers. The respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher strongly disagreed.

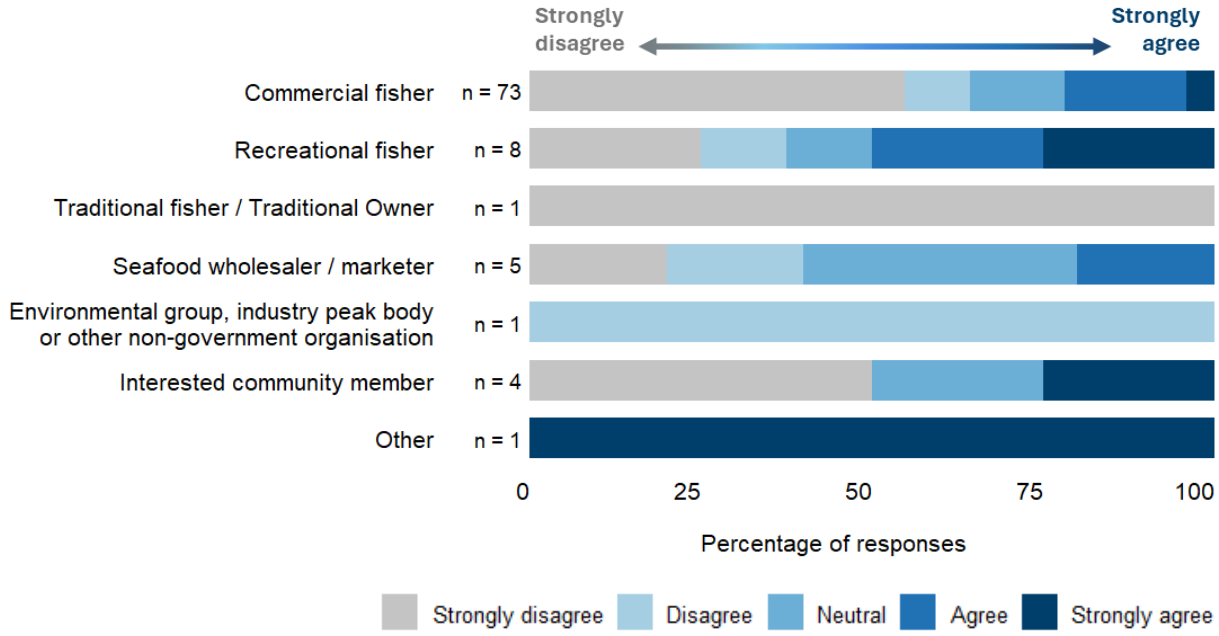
Question 16. Do you agree with the introduction of mandatory e-reporting via the Qld eFisher application?

All survey respondents



Responses to the proposed introduction of mandatory e-reporting via the Qld eFisher application showed mixed opinions. While a majority opposed the introduction (51.9% strongly disagreeing and 10.1% disagreeing), a notable proportion were neutral (13.9%) or supported e-reporting (17.7% agreeing and 6.3% strongly agreeing).

By stakeholder group

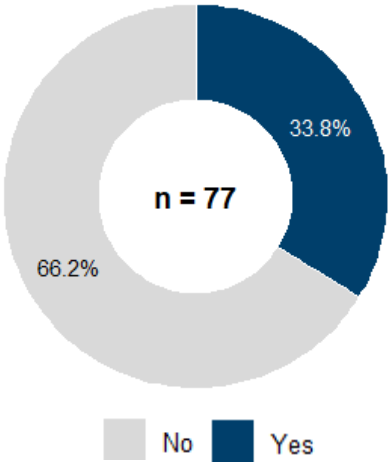


Responses to the introduction of mandatory e-reporting via the Qld eFisher application, varied across stakeholder groups. Among commercial fishers, the majority expressed disagreement. In contrast, the majority of recreational fishers supported the introduction of mandatory e-reporting or were neutral to the proposal. Both recreational fishers who strongly disagreed were also commercial fishers. The respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher also strongly disagreed.

Question 17. Should any other responsibilities, program components or operational requirements be considered in the design, implementation or delivery of an IOM program?

All survey respondents

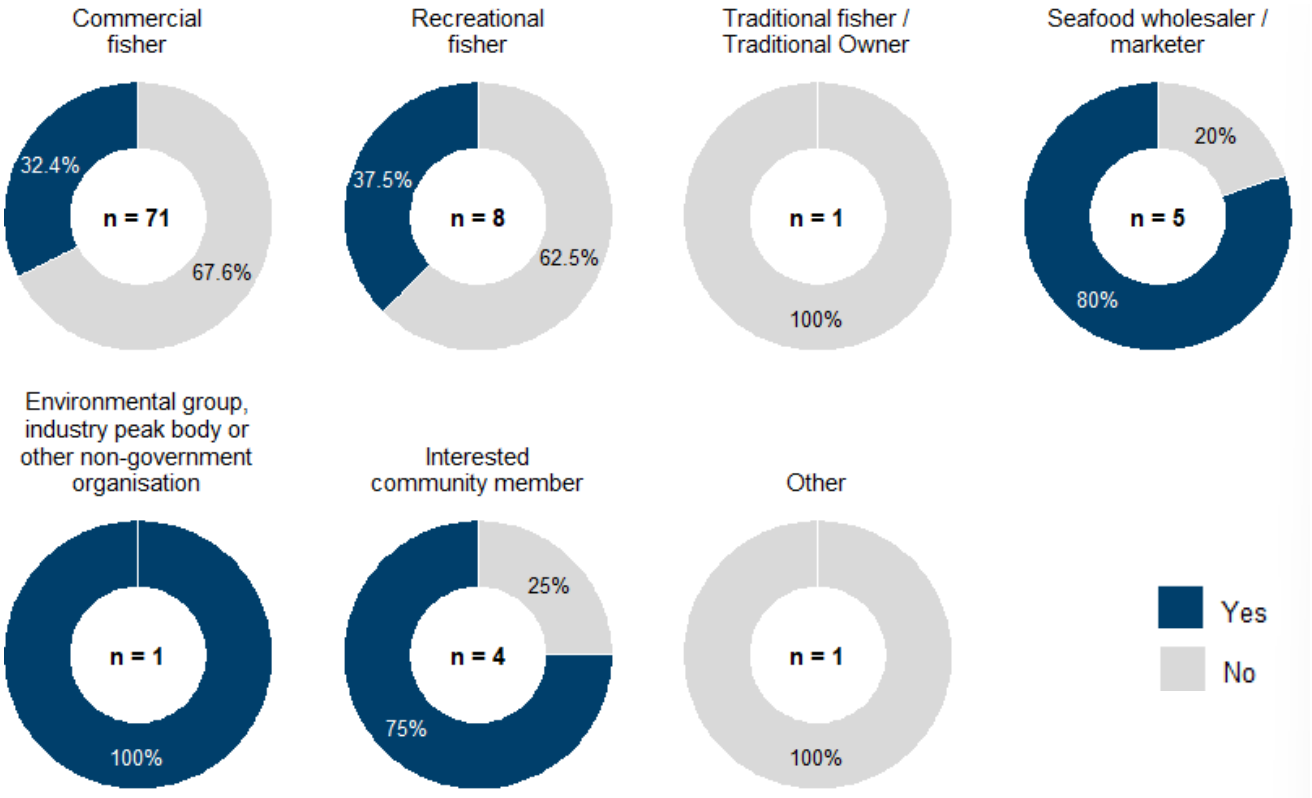
33.8% of respondents identified that there were other responsibilities, components and requirements that an IOM program should consider. These included:



- extra installation costs for vessels that require additional power for IOM systems
- compensation for damage to vessels and time lost due to malfunctions as well as no time restrictions on fishers for IOM system maintenance
- use of existing IOM systems on vessels if they sufficiently meet IOM program objectives
- consistent and reliable means of data transfer
- education on IOM systems for fishers
- improved eFisher application usability if electronic logbooks are mandated
- fishers owning their own footage and consideration of intellectual property rights.

By stakeholder group

Respondents from most stakeholder groups indicated that other responsibilities, program components or operational requirements should be considered for the delivery of an IOM program. Commercial fishers commented on how to improve systems to ensure fishers are fairly compensated, that their time and intellectual property is respected, and requested education of fishers around IOM systems. Recreational fishers commented on the ownership of footage and security of data.



4.5.2 General submissions

The table below summarises feedback from QSIA, AMCS/WWF and other industry stakeholders that related to the '*Objectives and design*' survey questions (Questions 13 – 17).

Feedback from QSIA

QSIA largely agreed with most objectives of the IOM program, however raised the importance that program scope remain focused on the validation of TEP species interactions. QSIA did not agree with the objective covering use of e-monitoring systems for compliance purposes. Their response recommended changes to draft objectives to account for industry ownership of data, referencing data deletion timeframes and also recommended a new objective be included that focused on supporting industry leadership and co-management of a future program.

QSIA emphasised the importance of ensuring efficiency in the review of camera footage and validation of data to minimise unnecessary burdens on fishers and reviewers, and the importance of aligning program objectives to meet international standards (i.e. MSC).

QSIA recommended a program should include a co-management framework, and raised concerns with privacy and trust should government manage key program components. They recommended that independent third parties should review footage for better transparency and limited potential bias.

While QSIA supported the proposal to mandate e-reporting, they noted that some existing issues with performance are ongoing and extensive support and training services should be provided to support industry transition. Their submission also suggested development of a desktop version of the e-fisher reporting application.

QSIA's submission also raised concerns with potential interruptions to planned fishing trips caused by equipment breakdowns or technical faults, advising that fishers should not be stopped from current or planned fishing operations in the event that malfunctions should occur.

Feedback from other commercial fishing stakeholders and groups

Some feedback raised concerns with the proposed objective suggesting program data would be used for compliance purposes.

Many fishers expressed frustration with the proposal for mandatory e-reporting citing technical difficulties and a lack of training. Some fishers highlighted the need for better training for skippers and crews to improve reporting accuracy instead of cameras. Fishers recommended providing comprehensive training and support packages for operators, including assistance with transitioning to e-reporting systems, and recognition of prior learning for experienced fishers to avoid unnecessary re-training.

Feedback from AMCS/WWF

AMCS/WWF supported the draft objectives but proposed several changes and additions. These included modifying conditions to include bycatch monitoring, adding an explicit condition to investigate and apply AI, and prioritising certain objectives over others, such as TEP species validation.

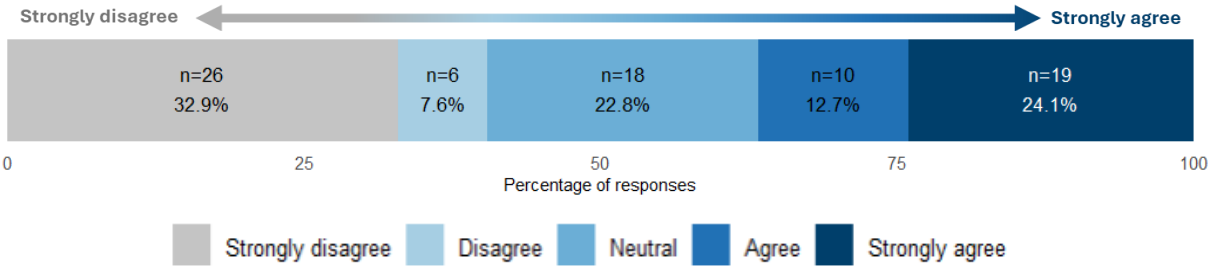
Their submission supported the roles and responsibilities of government and fishers as part of a future program, with a preference that footage be transferred electronically. Their submission also supported the use of camera footage for other compliance purposes and expressed support for mandatory electronic logbook reporting.

4.6 Funding and costs

4.6.1 Survey results

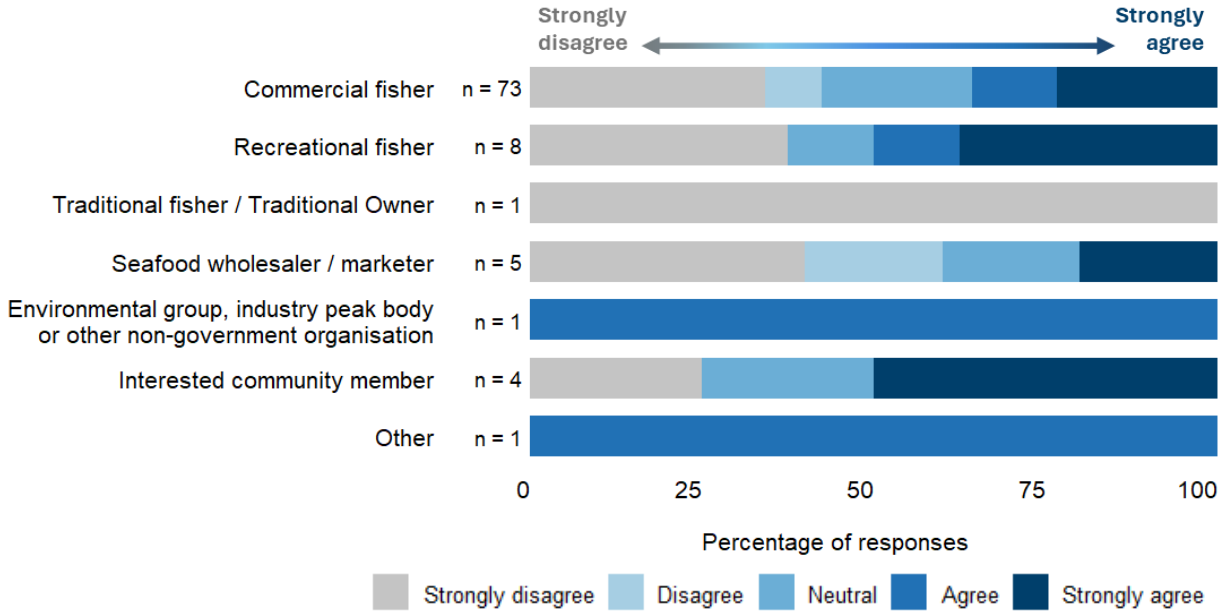
Question 18. Do you agree with government funding the establishment and ongoing management of an IOM program for the first 4 years?

All survey respondents



Responses to whether the government should fund the establishment and ongoing management of an IOM program for the first four years were more evenly spread compared to other questions. Approximately 40% either disagreed or strongly disagreed, 37% agreed to some extent, and nearly one quarter of respondents were neutral.

By stakeholder group

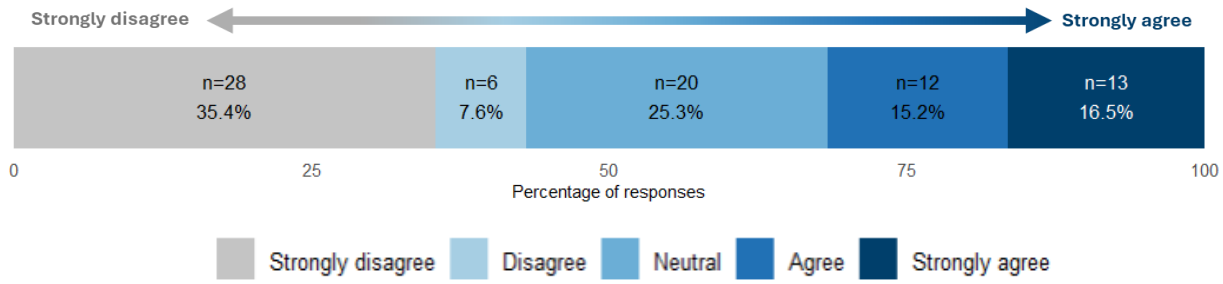


Responses to whether the government should fund the establishment and ongoing management of an IOM program for the first four years, varied across stakeholder groups. Among commercial fishers, recreational fishers, and seafood wholesalers/marketers opinions were mixed. Notably, both recreational fishers who strongly disagreed were also identified as commercial fishers. Similarly, the respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher also strongly disagreed.

It remains unclear whether those who disagreed with this question opposed government funding specifically—suggesting funding should come from alternative sources—or if their disagreement reflects broader opposition to the program itself.

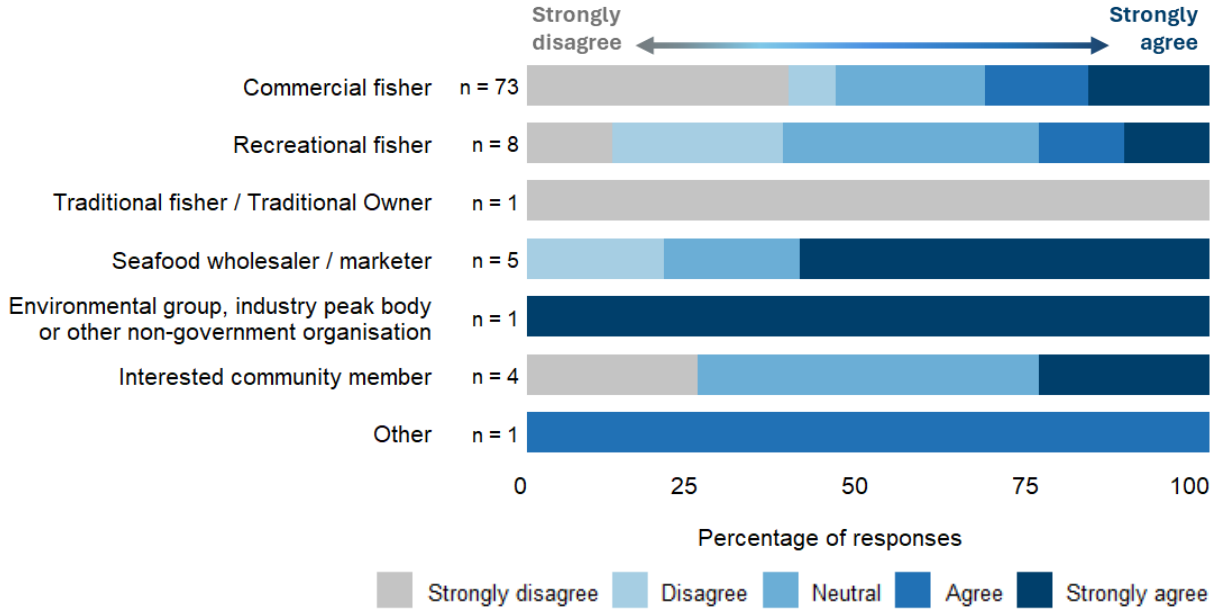
Question 19. Do you agree that a review of the IOM program should commence after 2 years of implementation?

All survey respondents



Opinions were divided on whether a review of the IOM program should commence after two years of implementation. While 43% expressed some level of disagreement, 31.7% agreed to some extent, and one quarter of respondents (25.3%) remained neutral.

By stakeholder group

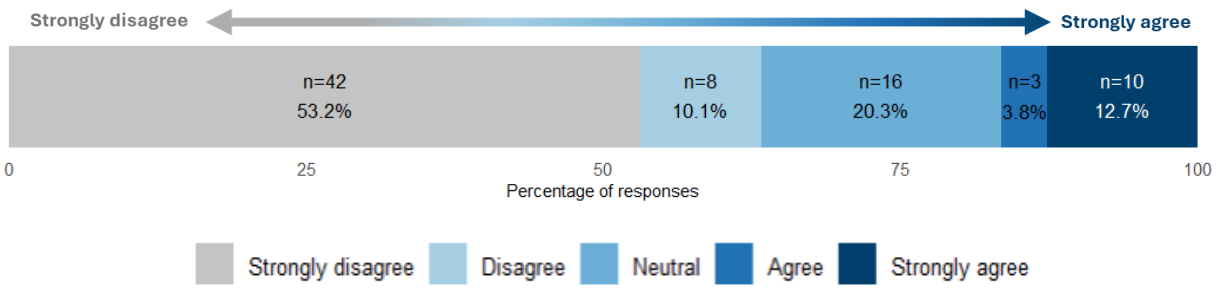


Responses on whether a review of the IOM program should commence after two years of implementation, varied across stakeholder groups. Among commercial fishers, recreational fishers, and seafood wholesalers/marketers there was a mixed response. Two of the three recreational fishers who expressed disagreement also identified as commercial fishers. The respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher strongly disagreed.

Given that the majority of commercial fishers opposed earlier questions on the implementation of an IOM program, these responses may reflect general disagreement with the program rather than specific opposition to a review after two years.

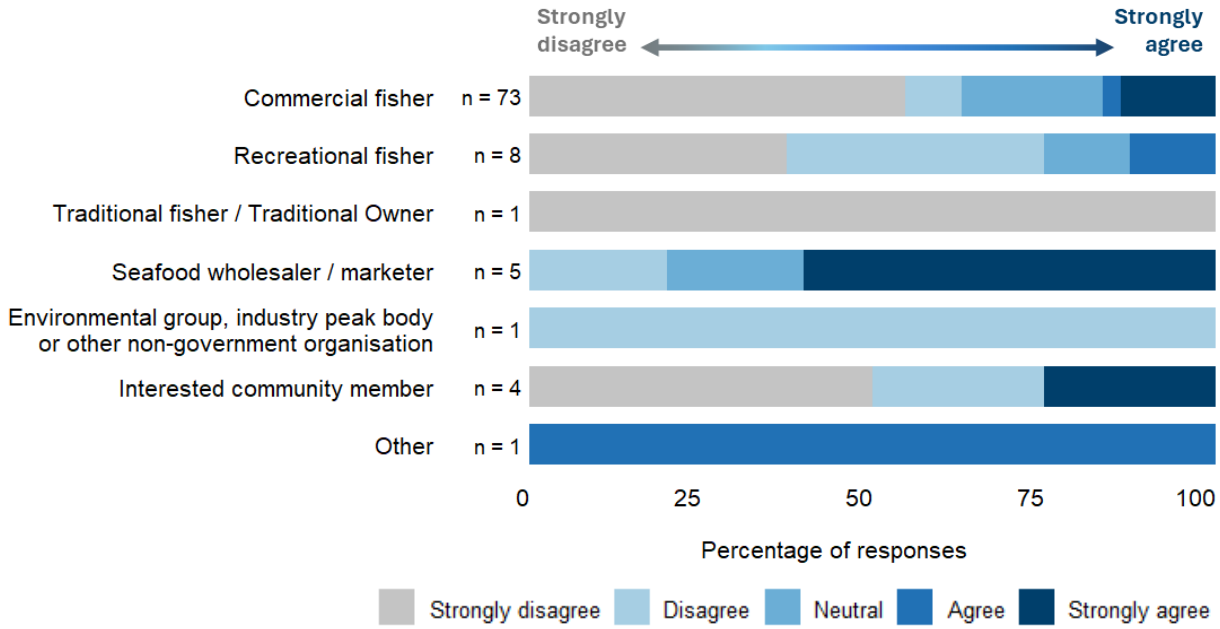
Question 20. Do you agree that the identified benefits and costs for the IOM program options cover all the factors that should be considered in making a decision?

All survey respondents



Most respondents disagreed with the identification of benefits and costs for the IOM program. Strong disagreement was the most common response (53.2%), followed by 10.1% who disagreed. Neutral responses made up 20.3%, while 12.7% strongly agreed and 3.8% agreed.

By stakeholder group



Responses on whether the identification of benefits and costs for the IOM program has been sufficient, varied across stakeholder groups. Most commercial and recreational fishers expressed disagreement, while the majority of seafood wholesalers/marketers in contrast strongly agreed. The respondent who identified as both a Traditional Owner/Traditional fisher and a commercial fisher strongly disagreed.

4.6.2 General submissions

The table below summarises feedback from QSIA, AMCS/WWF and other industry stakeholders that related to the '*Funding and costs*' survey questions (Questions 18 – 20).

Feedback from QSIA

QSIA's submission recommended that government should fund implementation and ongoing management of any IOM program, advising that recovering program costs from industry would force operators out of the industry.

Their submission supported a review after two years, providing recommendations to be considered including alignment of project outcomes with its objectives, meeting external needs, ongoing costs/affordability and long-term representative and risk-based coverage needs.

QSIA did not agree that the consultation-IAS presented accurate costs and benefits, suggesting benefits were overstated and costs were downplayed. QSIA raised concerns with estimated costs for key project components and identified areas where impacts were not accurately estimated or identified. Concerns were raised that the industry will be impacted greatly before the long-term benefits of IOM would be realised.

A key concern QSIA had with the cost benefit analysis was the assumption that implementing IOM would result in retained export approvals and access to the GBR, stating other external factors could influence these outcomes, not just the implementation of IOM. Several other issues were raised with the cost benefit analysis, some of which include hardware replacement timelines, future application of AI, feedback on the use of cashflows and discount rates, DPI management costs, hardware ownership and funding allocations across the fleet. QSIA also noted that the Net Economic Return (NER) method presented a disbenefit under all modelled scenarios.

Feedback from other commercial fishing stakeholders and groups

Submissions from commercial fishing stakeholders and groups highlighted sentiment that the proposed costs were seen as excessive, with many fishers citing concerns about inflation, limited service-providers, and the potential for costs to increase substantially. Some fishers noted that ongoing maintenance, internet costs, and wear and tear on vessels after the first four years would further strain their finances. Many recommended to maintain full government funding for the program until industry viability is proven and offer structural adjustment incentives to enable fishers to leave the industry and reduce costs for the program. Some stakeholders suggested developing a framework for industry co-investment in camera systems, supported by government subsidies or grants to help reduce upfront costs.

Submissions recommended to reassess the cost-benefit analysis of the program to ensure it is justified and proportionate to the actual risks to TEP species in the fishery. They also recommended to explore concessional loans, subsidies, or buyback schemes for operators unable to meet the financial burden and to partner with internet providers (e.g., Starlink) to reduce connectivity costs for electronic reporting and footage uploads.

Some submissions requested to include an industry steering committee in the program review process to evaluate the program's effectiveness and recommend adjustments.

Feedback from AMCS/WWF

AMCS/WWF supported the proposal for government to fund implementation of a program and undertake a review after two years. Their submission also included some feedback on future cost recovery options, suggesting industry be responsible for a portion of the ongoing program costs.

Their submission identified other benefits that were not covered in the consultation-IAS, including the advancements of scientific research and improved social licence that the data and information generated from an IOM program could provide. Their submission also raised concerns about the accuracy of the BDO information used to support the cost benefit analysis and calculation of NER.

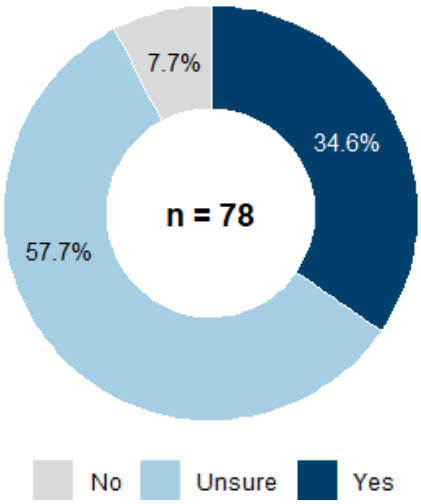
4.7 Options analysis

4.7.1 Survey results

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

All survey respondents

34.6 % of respondents suggested there are inaccuracies in the assessment of options which included:

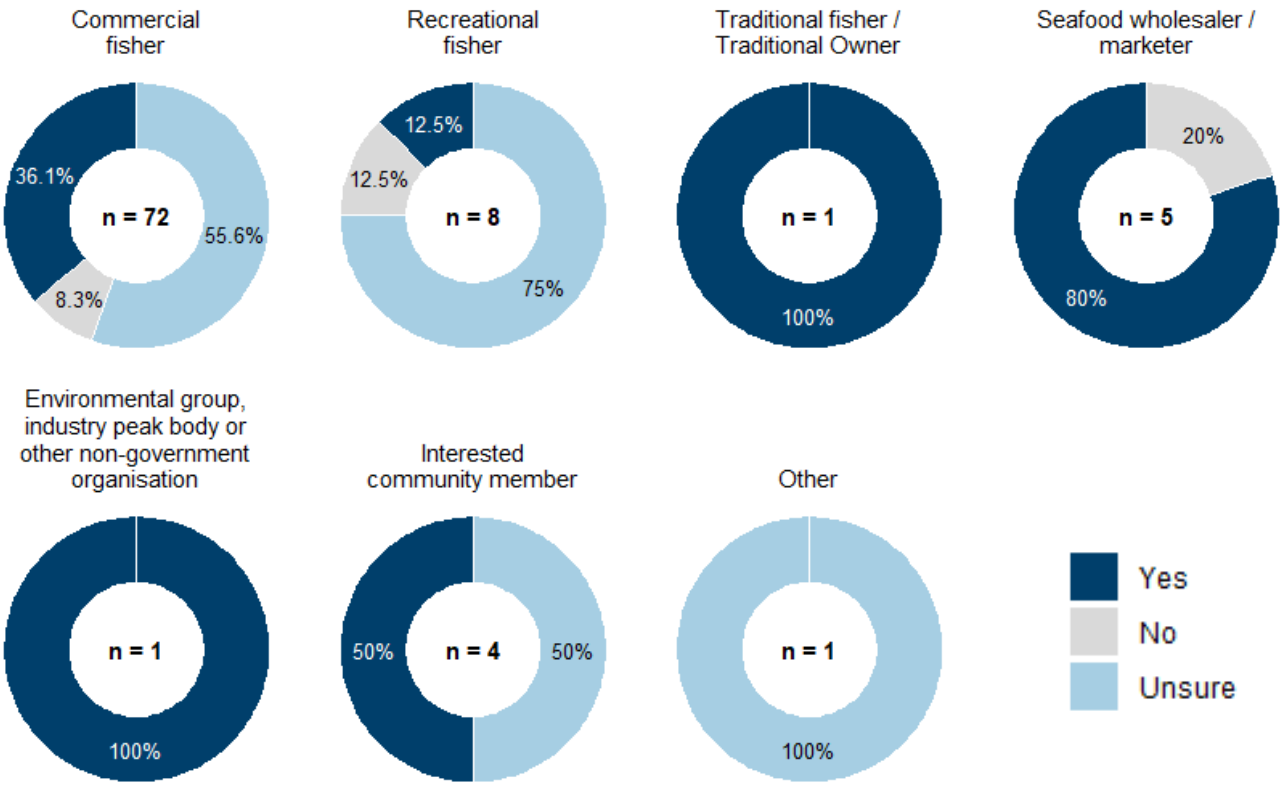


- the claim that logbook data currently does not adequately capture TEP species interactions is inaccurate
- both the impacts of trawling on TEP species and the trawl footprint are overestimated
- impacts on TEP species such as pollution and recreational fishing are underrepresented in program considerations
- the benefits of an optional buy out are not considered appropriately
- fishing days are not an accurate estimation of fishing, effort-fishing units would be more appropriate
- the effectiveness of the IOM program on boats without hopper and conveyor systems has not been adequately considered.

However, 57.7% of respondents are unsure if there are any inaccuracies, which may suggest a limited familiarity with the detailed content or technical aspects of the assessment, or uncertainty about the cost estimates and requirements.

By stakeholder group

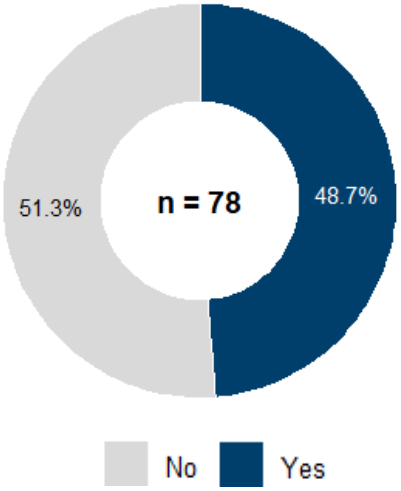
Respondents from most stakeholder groups indicated some inaccuracies in the assessment of options, with commercial fishers noting the majority of these concerns.



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

All survey respondents

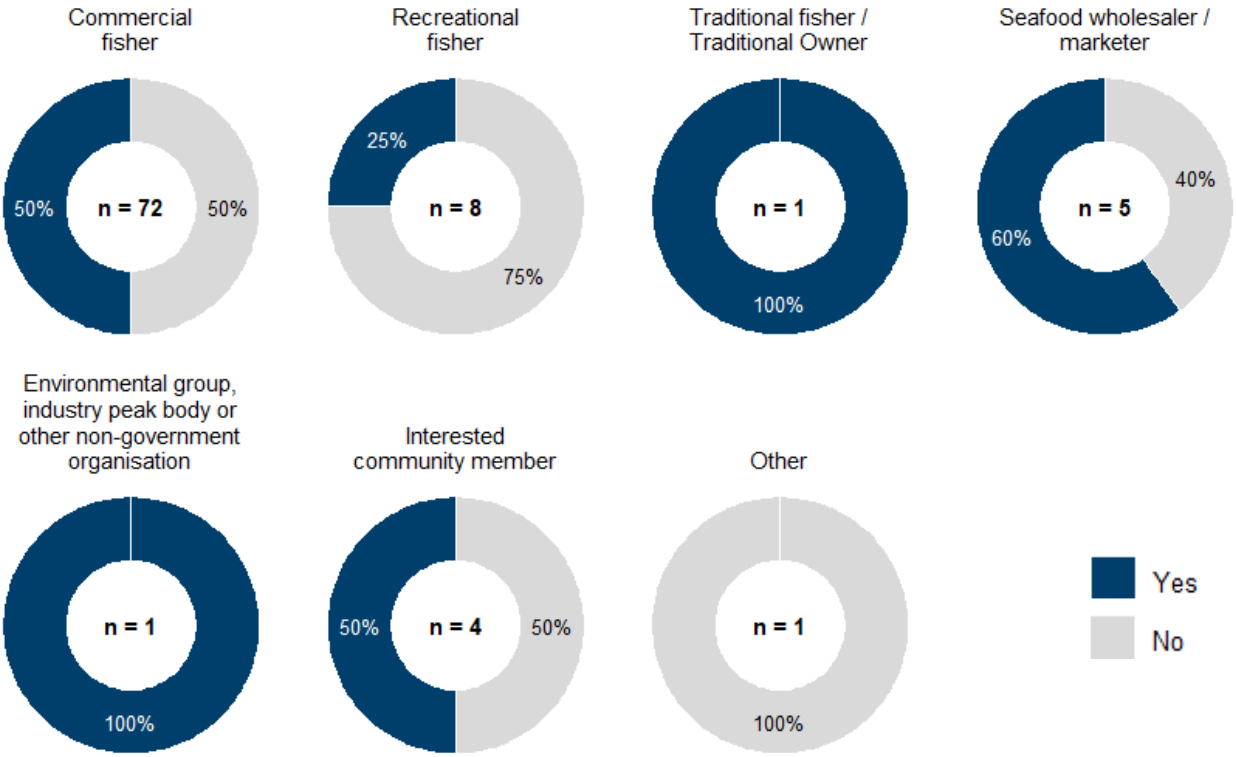
48.7 % of respondents believe that there are other factors that should be considered when evaluating the options. Suggestions included:



- financial costs to operators
- mental health costs to operators
- improved TEP species identification from IOM
- the support from industry for an optional buyout
- privacy of fishers and the security of data
- the inclusion of AI to improve program costs and resource requirements
- vessel size, fishing gear and fishing effort when prioritising implementation
- the program costs and responsibilities after the four-year implementation phase
- an alternative, industry-led IOM program, with fishers providing data reports to Fisheries Queensland
- the review rate of the IOM footage (e.g. more than 10% of footage reviewed)

By stakeholder group

Respondents from most stakeholder groups indicated that there are some inaccuraies in the assessment of options. The financial costs to fishers and concern for fisher privacy were common factors mentioned by most groups. One commercial fisher suggested that scenarios involving higher review rates, including up to 100% review, shoud be explored.



4.7.2 General submissions

The table below summarises feedback from QSIA, AMCS/WWF and other industry stakeholders that related to the '*Options analyis*' survey questions (Questions 21 – 22).

Feedback from QSIA
QSIA raised several inaccuracies with the consultation-IAS, some which include the use of 'high risk' language inconsistently and inaccurately, statements regarding non-compliance with TEDs and BRDs with no evidence, statements that improved TEP reporting is attributed to government not industry, and failure to present three viable options in the analysis.
Feedback from other commercial fishing stakeholders and groups
Some commercial fishers acknowledged underreporting of TEP species interactions in their submissions, attributing it to a fear of repercussions or a lack of training and awareness among skippers. However, other fishers claimed that reporting of TEP interactions to be accurate.
Feedback from AMCS/WWF
The AMCS and WWF submission raised issues that the IAS had not correctly estimated and presented other benefits of the program, including those associated with improved research and conservation outcomes for TEP species, as well as social benefits for industry.

4.8 Additional feedback

4.8.1 Survey results

Question 23. Do you have any other comments, questions or concerns about the proposed IOM program?

A total of 66 respondents commented in the additional feedback section of the survey.

Stakeholders provided a number of comments that did not support the proposal, including:

- Many respondents strongly opposed the program, citing concerns about constant monitoring, misuse or leaks of footage to external organisations, and the broader implications of surveillance.
- Significant concerns were expressed about the costs of installation, maintenance, and repairs of monitoring systems. Many feared the program would render their businesses unviable, forcing them out of the industry.
- Stakeholders expressed concerns about the long-term viability of their businesses, with some suggesting that the program could lead to further closures and restrictions.
- They highlighted that the industry is already heavily regulated, with declining numbers of fishers and increasing compliance costs. Many felt the program reflects mistrust in fishers.
- Respondents noted the stress on fishers, the loss of knowledge and expertise, and the declining cultural identity of the industry. Some noted the declining interest in the industry among younger generations due to over-regulation and high costs.
- Doubts were raised about the reliability of cameras, particularly for small vessels or in harsh conditions. Respondents noted concerns about system outages leading to penalties for fishers.
- Concerns were raised about the accuracy and usefulness of camera data, particularly for species identification and bycatch reporting.

- Frustration with past government decisions and fisheries management was evident, with calls for additional face-to-face meetings. Many viewed the program as politically motivated and unnecessary.

Some stakeholders provided constructive suggestions or expressed conditional support for the proposal, including:

- Proposals were made for industry-led monitoring programs, with funding and implementation tailored to individual vessels to reduce costs and improve ownership.
- Some suggested adopting a voluntary or risk-based rollout prioritising high-risk areas.
- Many respondents proposed a voluntary buyout for those unwilling or unable to comply with IOM due to financial strain.
- Many supported the use of onboard observers as a less invasive and more effective alternative to cameras.
- Calls were made for public reports on TEP species interactions to improve transparency and accountability.
- Suggestions included redirecting funding towards habitat restoration or other sustainability initiatives that benefit the broader ecosystem.
- Some recognised the potential for IOM data to contribute to research and better assess the sustainability and health of Queensland's fisheries, provided the data is anonymous and shared with researchers.

4.8.2 General submissions

The table below summarises other general or additional feedback from QSIA, AMCS/WWF and other industry stakeholders.

Feedback from QSIA
QSIA's submission highlighted the need to acknowledge, and consider, recent and historical reforms implemented across Queensland's trawl fisheries, most of which occurred at a significant personal and financial cost to industry. Consideration of the reduced risk to TEP and other species these changes have made also needed to be better explored (e.g. implementation of TEDs and BRDs, and extensive spatial and temporal closures). Other general concerns about the consultation-IAS process were received, including the document being too long, fishers feeling the consultation process was inadequate and pre-determined, including delivery and evaluation of field trials, and the mention of the NX fishery not being relevant to IOM in trawl fisheries. Their submission raised concerns about IOM impacting the retention of crew, with constant monitoring likely to also impact mental health and trust within the industry. They also highlighted skill shortages and practical constraints regarding the availability of personnel to install and maintain systems across the operating range of the fishery. Several privacy concerns were raised, including the release of footage to the public, with their submission recommending a data retention and privacy policy be created, along with other measures to reduce privacy including mandatory facial blurring. The need for clear and transparent management actions in response to protected species interactions was also raised as a key issue, with their submission recommending the development of a Threatened, Endangered and Protected Species management plan, developed jointly with industry before implementation, to define acceptable interaction levels and provide guidance to industry on the actions and objectives of TEP species management.

Their submission also recommended the use of AI to not only support program reviews and reduce ongoing program costs, but also automated catch and effort reporting for operators.

They recommended changes to the objective of government action presented in the consultation-IAS, suggesting the proposed objective was too prescriptive and limited the viable options that could be considered, narrowing viable options to IOM only. They also recommended the establishment of a multi-stakeholder steering committee to oversee technical parts of the program and program delivery, with industry members applying through an expression of interest (EOI) and receiving a seating fee.

QSIA recommended a review of the Fisheries Data Validation Plan be undertaken to ensure its effectiveness and alignment with IOM program objectives. They also highlighted the need for a voluntary structural adjustment program for operators unable or unwilling to continue under a future IOM framework.

A range of other considerations and recommendations were provided, some of which included, the need to develop a 25-year industry plan to provide certainty and encourage investment in fleet modernisation and sustainability, fleet replacement, recruitment and retention, access to concessional loans and tax concessions, disaster funding, shore based infrastructure considerations, workforce recruitment and retention, mental health and wellbeing, and structural adjustment.

Feedback from other commercial fishing stakeholders and groups

Commercial fishing stakeholders raised broad concerns that past fisheries reforms have increased costs, reduced fishing rights, and lowered the value of businesses, vessels, and licences. Many fishers cited a need for a cultural shift towards more transparent reporting but acknowledged mistrust of government from experiences.

Feedback received a common sentiment that the decision to implement IOM was predetermined and that consultation had been inadequate. Some fishers noted that while many are reluctant to engage in discussions, they still want their voices heard to help secure the future of the industry. Fishers emphasised the importance of transparency and meaningful consultation, and recommend future consultation processes be transparent, inclusive, and allow sufficient time for industry input. Many submissions included requests for regular updates and more opportunities for feedback.

Some commercial fishing stakeholders noted that industry-led management models, such as the Spencer Gulf fishery, could serve as a template for better governance and decision-making. Many recommended establishing a steering committee or working group with equal representation from fishers, government, and independent experts to oversee the rollout and ongoing management of an IOM program.

Ownership of cameras and footage was raised as a concern, with fishers requesting the ability to own their cameras and access their footage for purposes such as third-party accreditation (e.g., MSC or Fishery Improvement Project (FIPs)). Some fishers suggested the possibility of fishers purchasing their own pre-approved camera systems (similar to vessel tracking) to allow fishers to have control over their equipment and potentially reduce costs. One fisher suggested other agencies (i.e. AFMA) should be allowed to use camera footage when operating in Commonwealth fisheries to contribute to observer coverage for those fisheries.

Some fishers believe a loss of WTO accreditation will disproportionately impact operators in the WHA, particularly those in the Northern and Central fishery regions, where tiger prawn markets are linked to export prices.

There were widespread and strong concerns from commercial fishing stakeholders around privacy, with fishers noting many operators live onboard their vessels and some have minors onboard, noting fears that footage could be accessed by external groups, used against fishers, or the potential for misuse.

Some fishers cited a lack of trust in government to manage sensitive footage securely and raised concerns about cybersecurity and how footage will be policed. Recommendations from stakeholders included implementing strict legislative timeframes for footage retention and disposal (e.g., 12 months after

receipt or 1 month after review, with third-party audit footage held for a maximum of 3 months) and developing robust data security protocols to prevent leaks.

There were strong concerns from commercial fishers that mandatory implementation of cameras will worsen workforce shortages, with skippers, crew, and owners threatening to leave the industry and privacy concerns potentially deterring new recruits. To address these issues, recommendations received included developing recruitment and retention programs, and addressing mental health and wellbeing concerns by reducing unnecessary surveillance and ensuring transparency. Whilst there was some support for additional training requirements (i.e. the Master fisherman's training program), one fisher suggested recognising prior learning and a history of good compliance as an alternative for experienced fishers.

A common recommendation received in submissions from commercial fishing stakeholders was to offer voluntary exit pathways for operators unwilling to adopt cameras.

Feedback from AMCS/WWF

The AMCS/WWF submission included several other recommendations. A key recommendation related to the proportion of camera footage that would be reviewed, with the submission recommending a minimum of 20% of all camera footage be reviewed. The submission also included the recommendation to review all TEP species interactions that are reported. The submission explained that higher review rates are required to capture rare encounters and that other programs deliver higher rates than the 10% proposed in the consultation-IAS.

Their submission also recommended that all TEP interaction data be made publicly available on either a monthly or quarterly basis with no delays, and that fisher validation outcomes are reviewed and published each year.

5 Appendix

5.1 Online campaign submission – QSIA

The QSIA launched an online campaign allowing members and supporters to send a pre-written email to Fisheries Queensland, with the option to customise the text before sending. The standard pre-written was as follows:

Subject: Response to impact Assessment statement – Independent Onboard Monitoring in the Queensland Trawl Fishery

Fisheries Queensland – Consultation Team,

Thank you for the opportunity to provide feedback on the proposed implementation of independent onboard monitoring in the Queensland Trawl Fishery. As a Queensland resident with a deep appreciation for both our marine biodiversity and the hardworking communities that rely on sustainable fishing, I wish to offer a perspective that supports a balanced and evidence-based approach.

While I understand the concerns raised about potential bycatch of threatened species, I believe the current proposal risks overstating the problem and underestimating the professionalism and stewardship already demonstrated by Queensland's commercial fishers. These individuals operate under strict reporting requirements and have actively participated in sustainability initiatives, including training programs and other fishery improvement projects.

The suggestion that interactions with threatened species are routinely under-reported lacks substantiated evidence and unfairly casts doubt on the integrity of fishers. Rather than imposing blanket surveillance measures, I believe we should focus on collaborative solutions that build trust and improve outcomes without unnecessary burden.

- I do not support the proposal to install electronic monitoring cameras on all active trawl vessels, nor any recommendation to increase footage review to an arbitrary level. These measures are costly, intrusive, and risk diverting resources from more targeted, effective strategies. Instead, I recommend:
- A risk-based and voluntary rollout of onboard monitoring, prioritizing areas or vessels where data gaps genuinely exist.
- Maintaining a practical and cost-effective review rate, informed by scientific evidence rather than arbitrary targets.
- Investing in fisher-led reporting improvements and training, which foster accountability and build capacity within the industry.
- Ensuring transparency and consultation throughout the process, with clear protections for privacy and operational integrity.

Queensland's seafood industry is a vital part of our economy and cultural identity. Any monitoring initiative should reflect a genuine partnership between government, industry, and the public—one that respects the expertise of fishers and focuses on practical, achievable outcomes. Thank you for considering this perspective as part of your consultation process.

Sincerely,

[First and last name]

5.2 Online campaign submission - AMCS

The AMCS launched an online campaign allowing supporters to send a pre-written email to Fisheries Queensland, with the option to customise the text before sending. The standard pre-written was as follows:

Subject: Active trawlers need cameras on boats

Dear Fisheries Managers and Data Validation Team,

I'm contacting you as an Australian who is concerned about threatened species bycatch in the Queensland Trawl Fishery. I welcome the Queensland Government's consideration of deploying cameras on boats and appreciate the opportunity to provide feedback to the consultation and impact analysis.

Queensland and the Great Barrier Reef is a hotspot for threatened species biodiversity. However, iconic species such as sea snakes, sawfish, and our unique small sharks and rays are easily caught in the Queensland Trawl Fishery, where they can be injured or killed by the weight of the catch.

Despite the requirement for fishers to report these interactions, unfortunately, many of these remain under-reported and underestimated. We need an accurate picture of what is being caught, so that we can ensure the recovery of our threatened and protected species.

I strongly support the proposal to implement electronic monitoring cameras on trawl vessels and the objective to accurately identify and determine threatened and protected species bycatch. The proposed government funding to deliver the program is essential and I support a risk based staged implementation.

However, the proposal to implement electronic monitoring cameras on trawl vessels should be strengthened by delivering the following:

- Implementing cameras on all active trawl vessels.
- Deploying more resources to deliver the program over a shorter timeframe. I recommend staged implementation over 2.5 years, complete by December 2028, commencing with the most active vessels.
- Increasing the proportion of footage review to 20% to more accurately determine the numbers of rarely caught threatened species.
- Investment in AI technology to accurately identify species from camera footage, allowing 100% of the footage to be reviewed and cutting the costs associated with footage review.

Thank you,

[First and last name, postcode]

5.3 Stakeholder survey questions

Pre-questions

1. What sector of the fishing industry do you represent? (Select all that apply.)
    a. Commercial fisher
    b. Recreational fisher
    c. Charter fishing operator
    d. Traditional fisher / Traditional Owner
    e. Seafood wholesaler / marketer
    f. Hospitality (restaurant, café, fish and chip shop) owner / worker
    g. Fishing tackle retailer
    h. Environmental group, industry peak body, or other non-government organisation
    i. Interested community member
    j. Other
2. If you are a Queensland commercial fisher, which of the following fisheries do you primarily represent?
    a. Commercial trawl T1 / T2
    b. Commercial trawl M1 / M2
    c. Commercial fish trawl T4
    d. Commercial east coast (other than T1 / T2 / M1 / M2 / T4)
    e. Commercial Gulf
3. If you are a Queensland commercial east coast otter trawl fisher, which region(s) do you regularly/primarily fish? (Select all that apply.)
    a. Northern trawl region
    b. Central trawl region
    c. Southern inshore trawl region
    d. Southern offshore trawl region
    e. Moreton Bay trawl region

General feedback

4. Do you agree with the need for improved monitoring and independent validation of commercial fishing data?
    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree
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?
    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

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

    a. Observers
    b. Electronic logbooks
    c. Compliance monitoring
    d. Improved education
    e. Other – please specify:

Independent onboard monitoring program options

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

    a. Level 1 – 100% coverage of all vessels
    b. Level 2 – 100% coverage of Commercial Fin Fish Trawl Fishery vessels and 90% of East Coast Otter Trawl Fishery vessels
    c. Level 3 - 100% coverage of Commercial Fin Fish Trawl Fishery vessels and 25% of East Coast Otter Trawl Fishery vessels
    d. Maintain the status quo (no new monitoring requirements)
    e. Other - please specify and explain why:

Implementation and rollout

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?

    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

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

    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

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

    a. Interactions with threatened, endangered, and protected species
    b. Geographic location fished (including the Great Barrier Reef)
    c. Compliance history
    d. Type of fishing gear used
    e. Size of vessel
    f. Other – please specify:

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

    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

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

    a. Yes – please specify:
    b. No

Objectives and design

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

    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

14. Should any changes or other program objectives be considered?

    a. Yes – please specify:
    b. No

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

    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

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

    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

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

    a. Yes – please specify:
    b. No

Funding and costs

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

    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

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

    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

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?

    a. Strongly agree
    b. Agree
    c. Neutral
    d. Disagree
    e. Strongly disagree

Options analysis

21. Are there any inaccuracies in the assessment of the options?

    a. Yes
    b. No
    c. Unsure

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

    d. Yes – please specify:
    e. No

Additional feedback

23. Do you have any other comments, questions or concerns about the proposed independent onboard monitoring program?