



# Impact Analysis Statement

## Summary IAS

### Details

<b>Lead department</b>	Department of Primary Industries
<b>Name of the proposal</b>	Independent Onboard Monitoring
<b>Submission type</b>	Decision Impact Analysis Statement
<b>Title of related legislative or regulatory instrument</b>	Fisheries (Commercial Fisheries) Regulation 2019
<b>Date of issue</b>	November 2025

#### What is the nature, size and scope of the problem? What are the objectives of government action?

Validated commercial fishing data is important to support the sustainable management of fisheries resources and the assessment of the risks of commercial fishing to broader ecological communities. Validation of commercial fishing data improves confidence that the data being used to support scientific assessments is accurate and reliable, and any subsequent management action is supported by science.

While Fisheries Queensland has existing processes that support the independent monitoring and validation of some commercial fishing activities and data, such as vessel tracking, there are still challenges with the ongoing validation of data related to the reporting of Threatened, Endangered and Protected (TEP) species interactions. This is because TEP species interactions occur at sea with the TEP species required to be returned to the water immediately. There are also no mechanisms currently in place to independently gain a better understanding of other non-target catch (bycatch) as this product is also discarded at sea.

The primary tools available to independently validate commercial fishing interactions with TEP species, and independently monitor bycatch, are onboard camera systems, also known as electronic monitoring (e-monitoring) systems and independent onboard observers. In Queensland, the use of these two tools is described as Independent Onboard Monitoring (IOM).

The use of robust independent monitoring and validation measures across high-priority commercial fishing operations in Queensland is under increasing scrutiny from Australian Government agencies, environmental organisations and the wider community particularly in relation to interactions with TEP species and bycatch.

Several specific drivers behind the need to implement an IOM program in Queensland include:

- Conditions of Wildlife Trade Operation (WTO) under the EPBC Act, which is required to permit the export of product harvested from the fishery (Part 13A) and protect commercial fishers from prosecution under the Act for unintentional interactions with TEP species (Part 13), and
- Commitments under the Reef 2050 Long Term Sustainability Plan

The East Coast Otter Trawl Fishery (T1, T2, M1 and M2 symbols) and Commercial Fin Fish Trawl Fishery (CFFTF) (T4 symbol) are priority fisheries for IOM due to their risk with the collection of non-target species and TEP species interactions, and the need to satisfy time-bound EPBC Act approval conditions to maintain export approvals. The ECOTF and the CFFTF are important to the Queensland economy, contributing an estimated \$127.85 million (indexed to 2024) in gross value of production (GVP) to the state and employing 1,170 full-time equivalents (directly and indirectly).

In total, there are currently 361 ECOTF and CFFTF licences. Not all these licences are currently being used and in 2023, there were 243 active vessels operating with a T1, T2, M1 or M2 (ECOTF) symbol and with one active vessel operating with a T4 (CFFTF) symbol.

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



Government action also seeks to address commitments and conditions to maintain access to export markets, and access to fishing grounds in the GBRWHA, which is critical for the economic needs of the trawl fishery. To ensure an IOM meets expectations and objectives, an IOM program must follow a set of principles including that the program be independent, robust, risk based and accurate.

### What options were considered?

The Consultation Impact Analysis Statement (IAS) examined several options to achieve the government objective including increased education, crew-based observers and vessel tracking. While these options can contribute to better reporting and some validation, they are not feasible to achieve independent validation of TEP species interactions.

The use of human observers was also explored as an option in the consultation IAS but deemed unsuitable due to limitations with scalability, level of costs and safety concerns.

The main feasible option considered in the consultation IAS to achieve the government objective was:

1. Implement IOM across vessels in the ECOTF and CFFTF with varying coverage options considered:
  - 100% of CFFTF and ECOTF vessels or
  - 100% of CFFTF vessels and ECOTF vessels that account for 90% of fishing effort (**recommended**) or
  - 100% CFFTF vessels and ECOTF vessels that account for 25% of fishing effort

The decision IAS investigated further options proposed through consultation including a voluntary program and an industry owned model. These options were determined to not be feasible as they would not be able to meet program principles and objectives.

Consultation feedback, lessons learnt from an 18-month onboard camera field trial in the ECOTF and lessons from other large scale technology roll outs, were used to inform the final options presented in the Decision IAS.

The options in the Decision IAS include:

1. Option 1: Maintain the status quo – That is to not implement IOM
2. Option 2: Implement an IOM program for the ECOFT and CFFTF (**recommended**)

### What are the impacts?

The lack of a robust IOM program in Queensland's high priority fisheries, is expected to have several implications for the commercial fishing industry and broader Queensland economy, including:

- loss of approvals under the Commonwealth EPBC Act, which is required to permit the export of product harvested from the fishery (Part 13A) and protect commercial fishers from prosecution under the Act for unintentional interactions with TEP species (Part 13) - Loss of this approval will result in the loss of export approvals for the ECOTF and the CFFTF, with the value of exports estimated to be \$8 million and \$2 million respectively.
- the potential loss of access to fishing grounds in GBRWHA by not meeting commitments to the Reef 2050 Long Term Sustainability Plan - Fishing grounds in the GBRWHA represent approximately 50 per cent of the ECOTF's annual harvest with a value of \$60.32 million in annual GVP.

Feedback received from consultation raised concerns regarding the impact of implementing IOM from an industry perspective including concerns with cost impact particularly if industry need to contribute financially to the program after six years, inability to fish if equipment fails, privacy concerns and the potential for cameras to affect retention of crew due to privacy concerns. There was also uncertainty expressed regarding the action taken when TEP species interactions occur.

Published economic survey data show the overall profitability of the trawl fishery is already under strain in an economic environment of increasing input costs, labor shortages and an aging fleet of vessels. Given that existing profitability is either negative or marginal across all but the top quartile of fishers, current



employment levels are premised on operating with little or no profit margin, suggesting employment in the sector is already at risk prior to consideration of new operational costs.

Combined Queensland and Australian government funding is available to support implementation of an IOM program. It is proposed that this funding would be applied over six years to support implementation of the program.

Given the government commitment to fund the initial six years of implementation, the introduction of IOM is not expected to result in any additional costs to enterprises over this period. Ongoing program reviews every two-years will be undertaken to inform the ongoing program costs and management arrangements.

**Who was consulted?**

An 18-month onboard camera field trial was delivered with volunteer commercial fishers from the ECOTF and CFFTF. Results and recommendations from the trial were used to evaluate the performance of different e-monitoring systems and support design an IOM program. Fisheries Queensland undertook industry consultation throughout the design and delivery of the onboard camera field trial, including the presentation of field trial learnings and recommendations to key stakeholder groups.

A Technical Focus Group was established to support the onboard camera field trial, which afforded field trial participants the opportunity to discuss the technical aspects of the trial and provide advice, recommendations and improvements. The Technical Focus Group met seven times during delivery of the field trial. Field trial participants were also invited to participate in the evaluation of the field trial results and participated in the drafting and review of the final field trial report.

A consultation IAS was published to investigate options to implement improved monitoring and independent data validation across priority trawl fisheries. Public submissions were open for an 8-week period between 11 July 2025 and 7 September 2025. A range of communication and engagement activities were undertaken to seek feedback, including three large port meetings in Cairns, Townsville and Moreton Bay, face-to-face engagement sessions across major ports, and online material including a webinar with moderated Q&A session accessible for all trawl licence holders, factsheets and an information video.

Over 10,000 submissions were received through survey responses, eHub submissions, emails, verbal feedback, and public responses driven by online campaigns. Key stakeholder groups that engaged with the survey included commercial fishers, recreational fishers, seafood wholesalers, a Traditional Owner, and several interested community members. A large number of public responses also reflected support for online campaigns led by the Queensland Seafood Industry Association (QSIA) and the Australian Marine Conservation Society (AMCS).

The feedback varied across the submissions with some stakeholder groups seeking full fleet coverage and faster roll out while other stakeholder groups did not preference any of the options presented and suggested slowing down the roll out due to operational practicalities.

**What is the recommended option and why?**

Option 2: Implement an IOM program for ECOFT and CFFTF.

IOM methods, including e-monitoring systems and onboard observers, are the only tools available that can be used to support the ongoing monitoring and validation of commercial fishing data, specifically TEP and bycatch species.

To ensure an IOM program meets the objectives and principles of being representative, robust, accurate and risk based, implementation is proposed across 100% of CFFTF and ECOTF that account for 90% of annual fishing effort utilising e-monitoring systems.

The implementation of the program also includes:

- Prioritisation of the highest effort vessels and priority management regions
- 6-year implementation timeframe across ECOTF vessels, commencing June 2026
- A risk-based approach applied to review and validation of camera footage, to ensure a representative baseline of data



- Ongoing performance reviews – 2-year reviews to evaluate program performance, costs and ongoing management

Other commitments to be implemented as part of the proposed IOM program to support objectives and in response to some of the feedback received include:

- mandatory adoption of the existing electronic catch and effort reporting across all active vessels of the ECOTF and the CFFTF
- commencement of a Technical Focus Group with key industry stakeholders to support implementation of the program and the development of operational and administrative components
- co-development of an education plan focused on TEP identification, reporting and use of electronic systems
- publication of a *Data Retention and Privacy Policy* outlining details of how footage will be kept secure, and the situations in which the footage or data may be disclosed

In order to ensure that EPBC Act approvals remain in place for the ECOTF and the CFFTF, an IOM program is to be implemented. The loss of export approvals will impact on businesses that rely directly on export markets and seafood supply chains. This will significantly impact fishery profits, jobs and industry’s long-term viability. Should an IOM program not be implemented in the ECOTF and CFFTF, commitments made under the Reef 2050 Long-term Sustainability Plan risk review of access to fishing grounds within the GBRWHA. Extending the proposed commitment of 90 per cent fishing effort coverage to 100 per cent would yield little further data. Further, increasing roll out to 100 per cent of fishing effort in the fleet would increase the cost of the program by a third and capture vessels that mostly operation outside of the GBRWHA.

Establishment of an IOM program also represents several benefits to commercial fishing businesses and the community through improved confidence in data and opportunities to uplift commercial fishing businesses through improved market accesses. The IOM program is expected to have a positive impact on the social licence of the fishers that operate within the GRBWHA through improved understanding of their ecological impacts.

The use of e-monitoring systems is proposed over other methods, such as onboard observers, as they are a more cost-effective method over the long term and can support a scalable monitoring and independent validation program.

## Impact assessment

### All proposals – complete [do not delete]:

	First full year	First 10 years**
<b>Direct costs – Compliance costs*</b>	<b>Zero</b>	<b>\$NA*</b>
<b>Direct costs – Government costs</b>	<b>\$1,166,879</b>	<b>\$12,384,314</b>

\*Government is funding the first six years of the program. It has not yet been determined how the remaining \$8,271,507 for the final four years will be funded.

### Significant proposals – also complete this table and a full IAS (refer box 1 below):

	First full year	First 10 years
<b>Total costs</b>	<b>\$1,166,879</b>	<b>\$20,655,821</b>
<b>Total benefits</b>	<b>\$60,463,337 (Gross Value of Production) \$768,961 (Net Economic Return)</b>	<b>\$454,396,023 (Gross Value of Production) \$5,778,919 (Net Economic Return)</b>



<p><b>Net present value</b></p>	<p>--</p>	<p><b>\$433,740,201</b>  <b>(Gross Value of Production)</b>  <b>-\$14,876,902</b>  <b>(Net Economic Return)</b></p>
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**Signed**

**Graeme Bolton**  
 Director-General  
 Department of Primary Industries

Date: 25/11/2025

**Anthony Perrett MP**  
 Minister for Primary Industries

Date: 27/11/2025