

Sustainable Fisheries Strategy

2017–2027

Vessel Tracking Consultation Report

Feedback on draft policy and guidelines

June 2018

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Summary

The draft vessel tracking policy and guidelines were released on 2 January 2018 for feedback. Consultation, which included face to face meetings and an online survey was open until 23 February 2018.

Officers from Fisheries Queensland met with more than 280 people at 143 meetings across 22 locations in Queensland to gather an understanding of fishing operations and to determine if the draft vessel tracking policy and guidelines accommodated all fisheries operations.

A total of 128 responses were received in reply to the online survey. Feedback was also provided by letter, phone and email.

Specific to the draft vessel tracking policy and guideline, there was concern about:

- mobile phone reception issues
 - for notification of vessel tracking unit failures,
 - manual reporting frequency, and
 - activation of replacement units
- having to remain in port if a vessel tracking unit fails
- vessel tracking units on tender vessels in addition to the primary vessel

Not specific to the draft vessel tracking policy and guideline, there was strong concern for:

- the cost of vessel tracking
- the confidentiality of vessel tracking data – how and what information is released to the public and the security of the data that's accessed by Fisheries Queensland and partner agency staff
- how the data may be used for enforcement purposes in marine park areas e.g. traversing and anchoring in Marine National Park (green) zones, turtle and dugong 'Go-slow' zones

The results of consultation will be used to finalise the vessel tracking policy and guideline and will assist in the process of rolling out vessel tracking more broadly, including the rebate scheme.

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1 Background

The Sustainable Fisheries Strategy 2017 – 2027 (the Strategy) was released in June 2017. The Strategy outlines the Queensland Government's vision for the future management of the State's fisheries resources and aims to create a modern, responsive and consultative approach to fisheries management ensuring fishing is a low risk to Queensland's aquatic resources; and that these resources are used in a way that optimises benefits to the community.

The Strategy sets out clear targets to be achieved and a range of actions to deliver on these targets, including implementing vessel tracking across all commercial and charter boats by 2020 with a priority on line, net and crab fisheries by the end of 2018.

1.1 Purpose of this report

The purpose of this report is to provide an overview of the draft vessel tracking policy and guidelines consultation and summarise the feedback received from industry. It does not contain any final Government position on vessel tracking or draft vessel tracking policy and guidelines.

2 Consultation process

2.1 Communication and meetings

Consultation on the draft vessel tracking policy and guideline took place over an eight week period from January 2018 and consisted of:

- Direct communication with all licence holders (commercial fishing boat, commercial fisher, harvest fishery and charter licence holders)
 - letters;
 - text message;
 - emails; and
 - face to face meetings
- social media posts;
- media releases (further distributed by local newspapers and radio);
- a promotional video;
- website promotional material; and
- an online survey

2.2 Making a submission

Industry stakeholders were able to have their say on the draft vessel tracking policy and guidelines by completing an online survey, meeting with Fisheries Queensland staff, sending a written submission via post or email or by calling to speak with a Fisheries Queensland staff member.

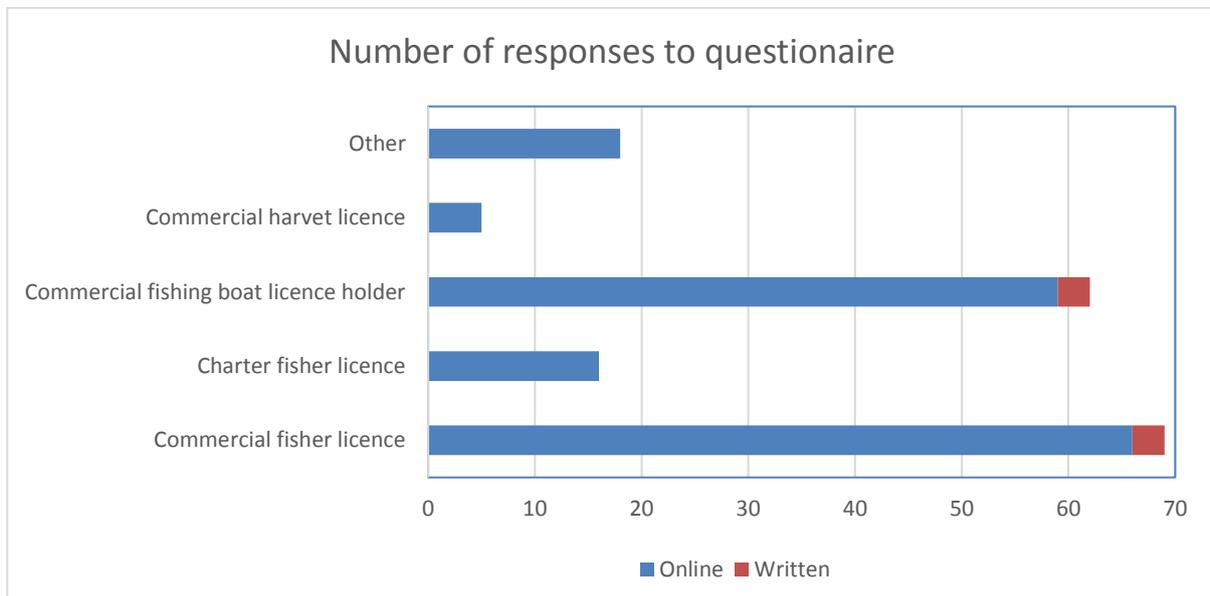
3 Consultation statistics summary

3.1 Responses received

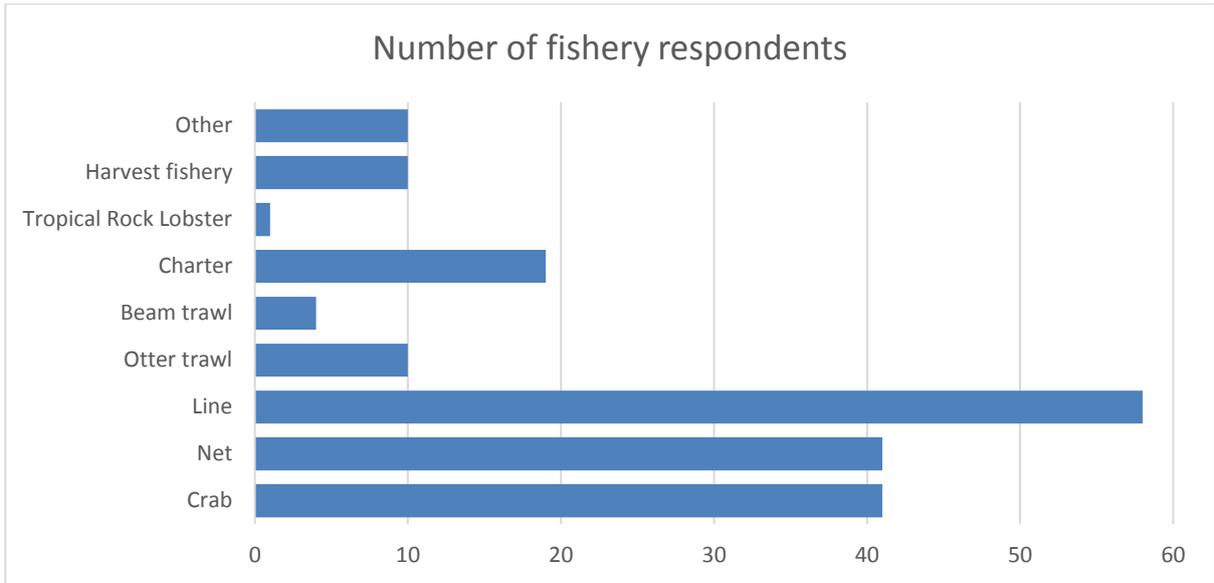
A total of 128 responses to the survey were received, including 125 responses to the online survey and 3 written surveys. More than 280 people met with Fisheries Queensland staff at 143 meetings across 22 locations in Queensland. In addition, numerous phone calls, emails and letters were received.

3.1.1 Survey responses received

Within the survey, participants were asked to select which authorities they held and could select more than one response.



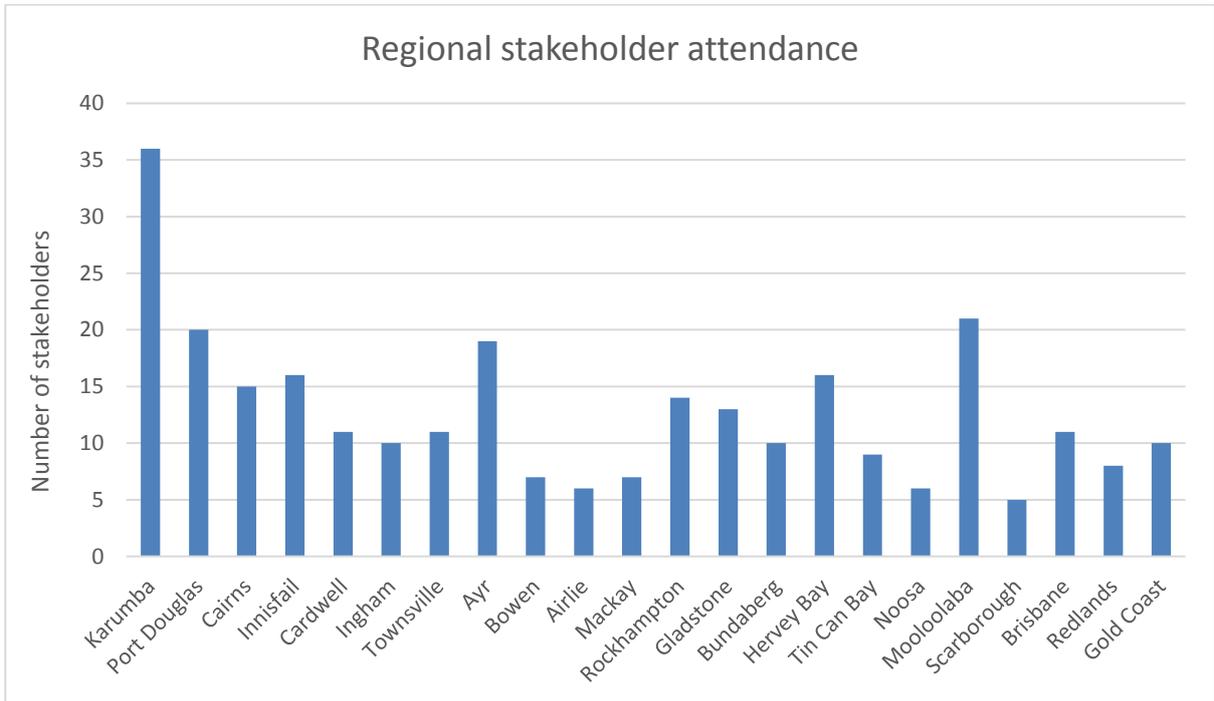
Participants in the survey were also asked which fishery they operated in or had an interest in and were able to select multiple responses. The below graph represents the number of fishery specific respondents to the survey.



The majority of survey respondents held an interest in the line, net and crab fisheries.

3.1.2 Meeting attendance numbers

The below graph represents the number of individual stakeholders that attended and met with Fisheries Queensland staff for all locations.



4 Feedback analysis

4.1 General feedback

While this exercise was undertaken to gain feedback on the draft vessel tracking policy and guidelines, the feedback revolved around the cost of implementing vessel tracking and data confidentiality (see Table 1).

Table 1 – General feedback received from industry

Issues raised	Overall response
1. Cost	Strongly disagree — the majority of stakeholders do not want to pay for the cost of implementing vessel tracking. Stakeholders preferred to initially purchase a unit as long as they did not have to pay the monthly airtime fee / data costs.
2. Data confidentiality	Disagree —the majority of stakeholder feedback raised the issue of data confidentiality. Stakeholders consider fishing locations to be an individual’s intellectual property. There were concerns if this data is leaked to the public or other sections within industry there would be significant financial implications and devalue their licences. In addition, there was a more minor concern that the information gathered could be used to develop further marine park zoning.
3. Hourly reporting	Disagree — stakeholders considered hourly manual reporting was too onerous on a fishing operation. For instance, a primary line vessel may be anchored while the skipper uses a tender and therefore no one would be on board the primary to manually report. Further concerns raised by solo operators that indicated they would not have time to make a phone call every hour.
4. Vessel tracking failure - remain in port direction	Strongly disagree — stakeholders did not think that it was reasonable to remain in port if a vessel tracking unit fails as this would ultimately incur a loss of operating hours and therefore income.
5. Vessel tracking failure – return to port direction	Strongly disagree — stakeholders who conduct greater than 5 day trips and operate in remote areas, did not think that it was reasonable to return to port as this would incur a loss of operating hours and therefore income.

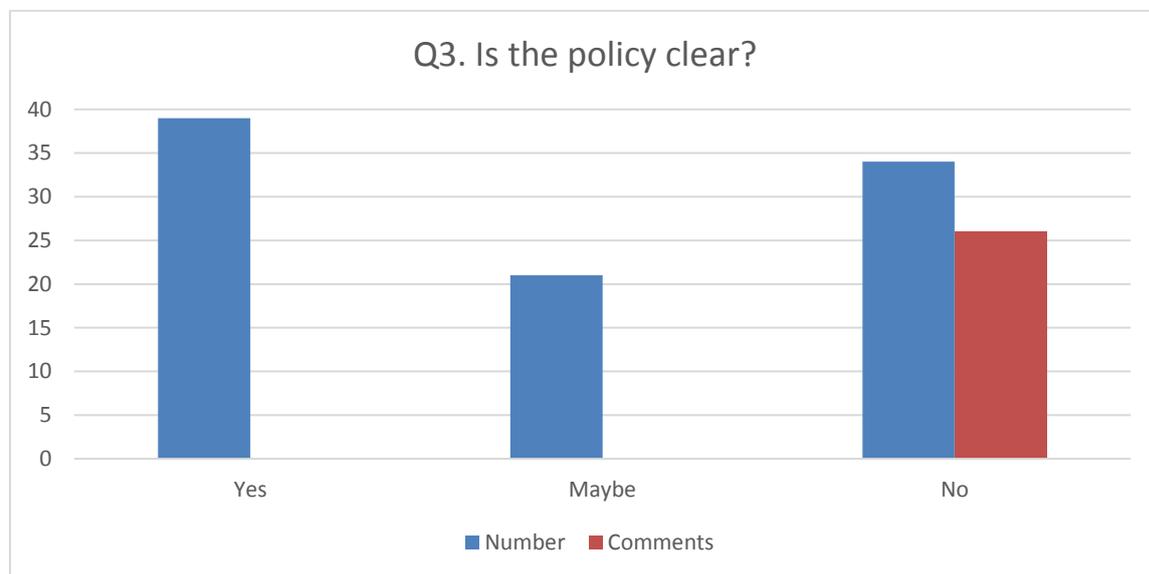
6. Vessel tracking failure – tender boat to return and remain with primary boat direction	Strongly disagree — stakeholders felt it was unreasonable for a tender to be required to return to the primary boat and remain alongside as this would incur a loss of operating hours and therefore income for their employees.
7. Vessel tracking on Recreational fishing vessels	Agree — many stakeholders raised their desire to have vessel tracking on all recreational fishing vessels. Concern that commercial sector is being targeted. Further concern raised that commercial fishers would be required to have vessel tracking while using their vessel recreationally.
8. Entering marine park zones	Neutral — there was concern from a minor component of stakeholders that vessel tracking positions within a marine park could result in an investigation whether they were fishing or not.
9. Mobile phone reception	Agree — phone reception was a major concern for industry. Concern about the need to purchase/use a satellite phone – this was seen as additional cost and a satellite phone would not work in all situations.
10. Vessel tracking on primary vessels not tenders	Agree — most stakeholders were in agreement that a vessel tracking unit on the primary vessel would be accepted but that having them on tender vessels was costly and less beneficial for data.
11. Airtime contracts	Neutral — there was concern from industry that 12 month airtime contracts would not be flexible enough due to limited fishing seasons and operations. This would cost industry when they were not active in the industry for the majority of a 12 month period.

4.2 Online survey — feedback results

The survey contained seven questions with three specific questions to the draft policy and guidelines. The results of the three specific questions are as followed. The questions asked were:

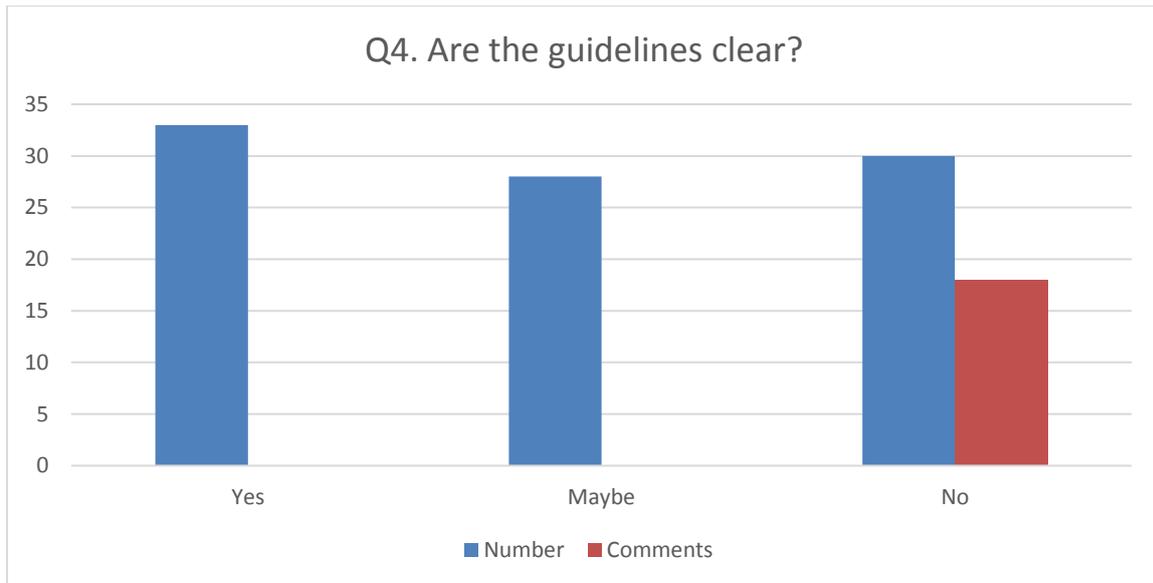
- Q3. Is the **vessel tracking policy** clear and do you understand your requirements under the policy?
- Q4. Are the **vessel tracking guidelines** and scenarios clear?
- Q5. Do the **vessel tracking guidelines** and scenarios take in to consideration the circumstances in your fishing operation?

If a respondent answered “no” or “maybe” to a question, they were prompted to provide a response as to why they had selected “no” or “maybe”. Specifically, what was not clear in the draft policy and guidelines and what scenarios had not been considered.



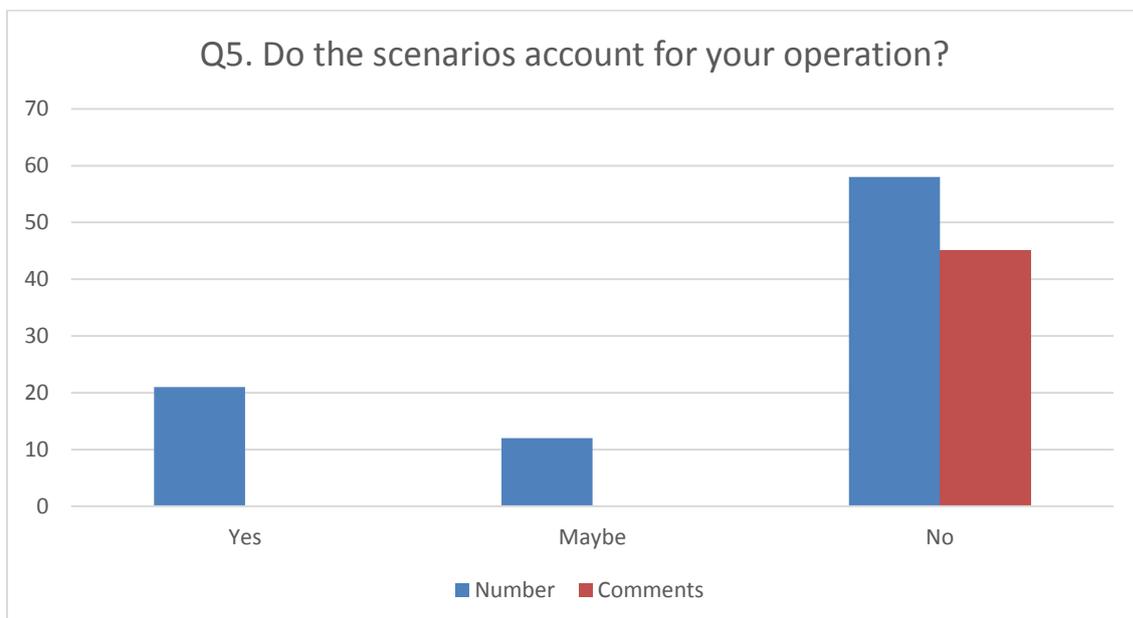
Key feedback

- The online survey results indicated that generally the draft policy was clear. Of the respondents that stated the draft policy was not clear, 26 responded with a comment as to why it was not clear.
- Only five of these comments were specific to the draft policy, three wanted information on the costs and one wanted information on the approved units and where to purchase them from. The remaining 17 responses were not specific to the draft policy.



Key feedback

- The online survey results indicated no large distinction in the clarity of the guidelines for fishers. Although there was evidence to suggest most respondents that selected “no” was due to general dissatisfaction with the implementation of vessel tracking.
- 18 respondents that selected “no” responded with a comment as to why it was not clear.
- Only three of the comment responses were specific to the guidelines and two requested information on the costs and the units themselves. The remaining 13 responses were not specific to the guideline



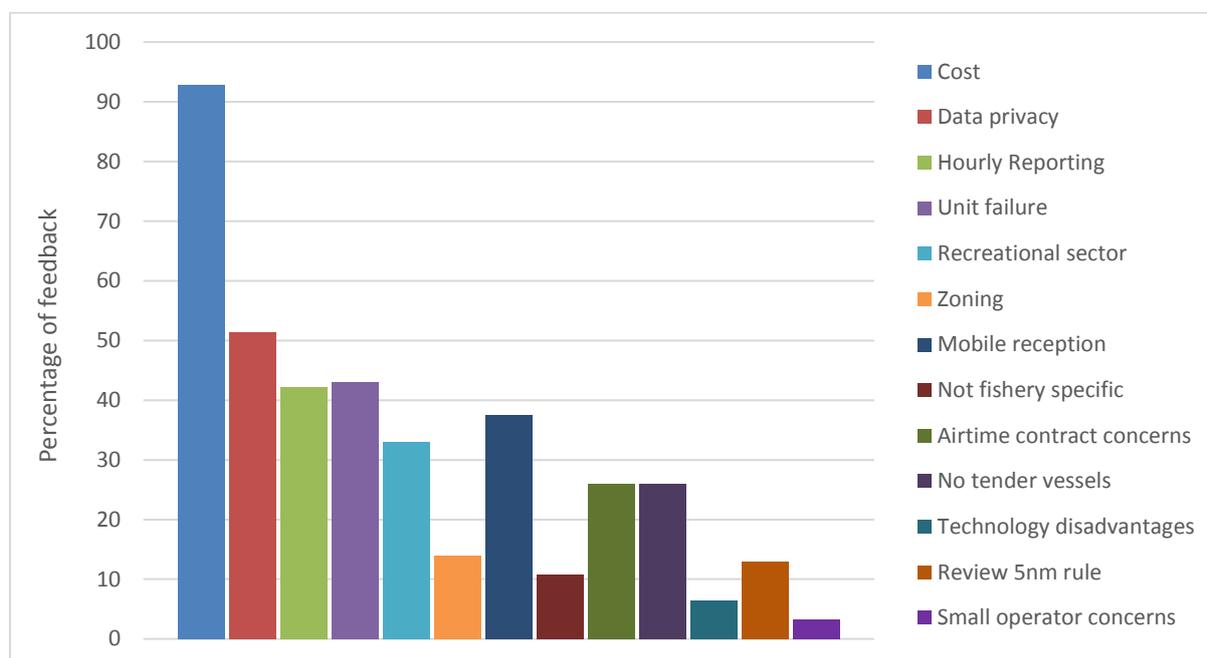
Key feedback

- The online survey results indicated that the scenarios illustrated in the guidelines were not relevant to their operation.

- 45 of “no” respondents provided feedback as a comment.
- Only 19 of the comment responses were specific to an individual’s operation. The remaining 26 responses were non-specific to scenarios or operation.
- The 19 responses that were specific to an individual’s operation have been included in the suggestions section of this report.

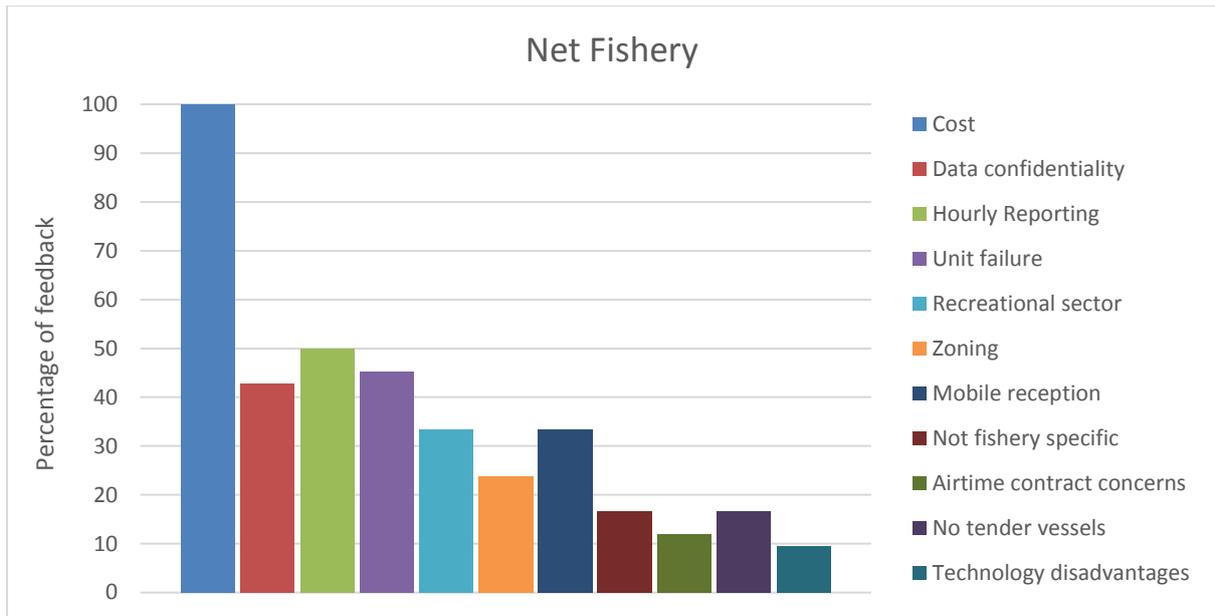
4.3 Stakeholder meetings — feedback results

All feedback from the stakeholder meetings were collated and the main concerns regarding vessel tracking and the draft policy and guidelines extracted. The figure below represents the percentage of stakeholders that raised concerns about a particular issue regarding vessel tracking.



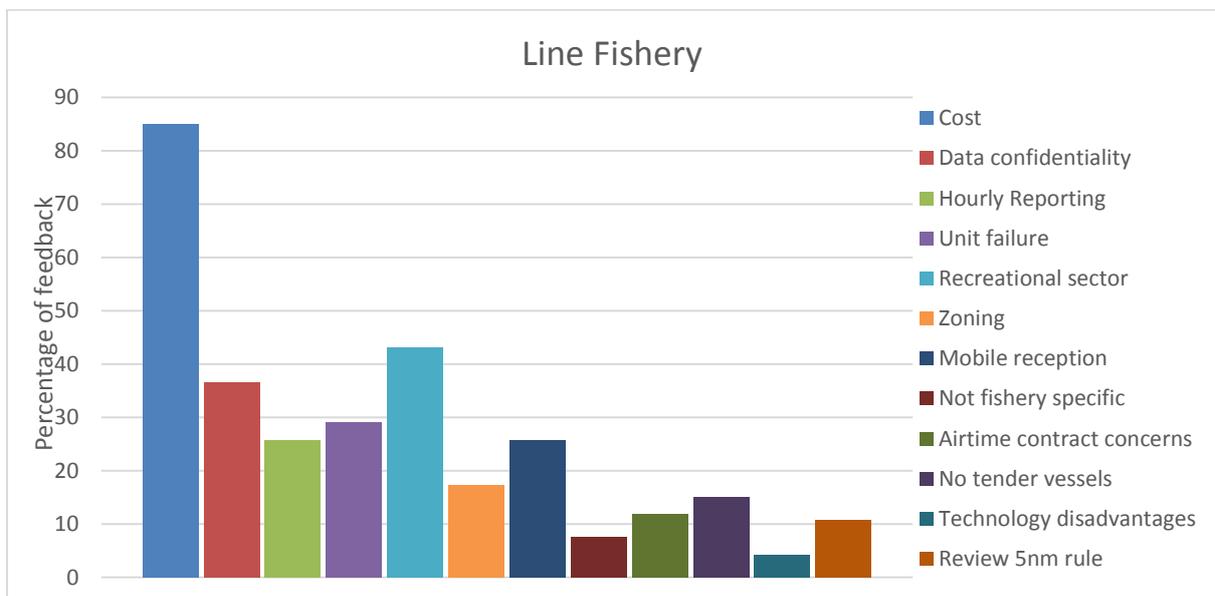
Key feedback

- The major concerns for fishers, within all regions, was the cost of vessel tracking and the confidentiality of vessel tracking data. While this is noted, this issue is not specific to the draft vessel tracking policy and guidelines.
- Specific to the vessel tracking policy and guidelines was the issue of vessel tracking unit failures, mobile phone reception concerns and hourly manual reporting.



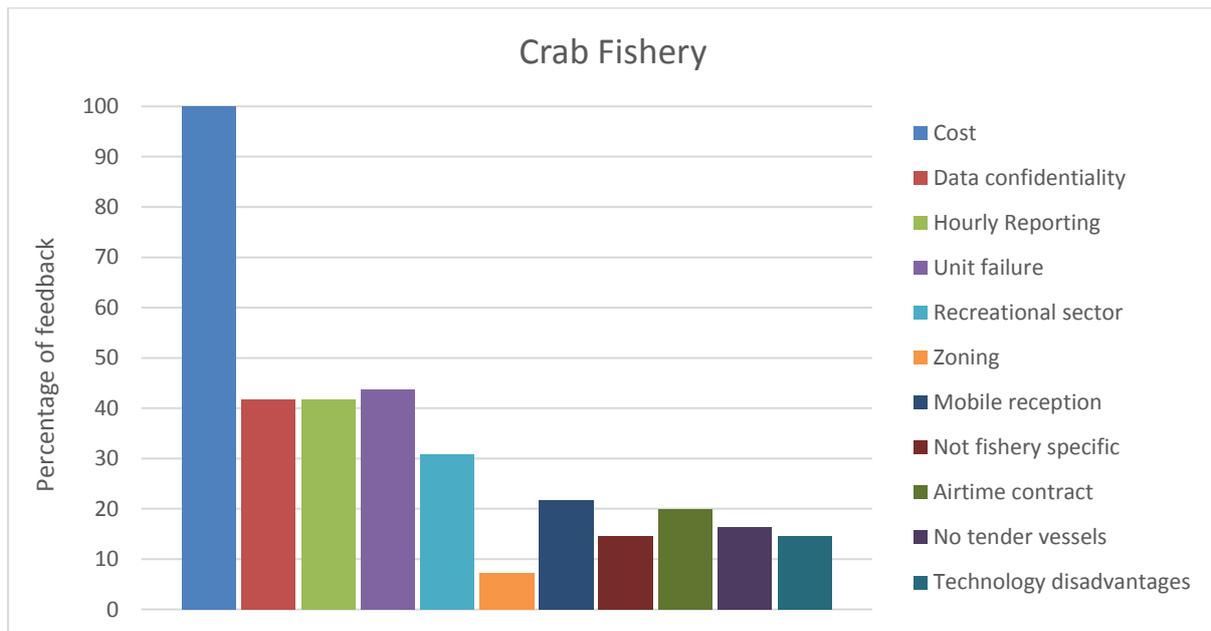
Key feedback

- The major concerns for fishers operating in the net fisheries included hourly reporting, unit failure and reception
- Fishers submitted that the vessel tracking unit should be limited to the primary vessel only, (not the tender vessels) as fishers believed the data would not be useful and it was an additional cost to industry
- To a lesser extent, fishers indicated the draft policy was not specific enough for netting operations and does not consider boat sizes and gear on netting boats
- 10% of respondents said that they are technologically disadvantaged (i.e. have neither a mobile phone or navigation plotter).



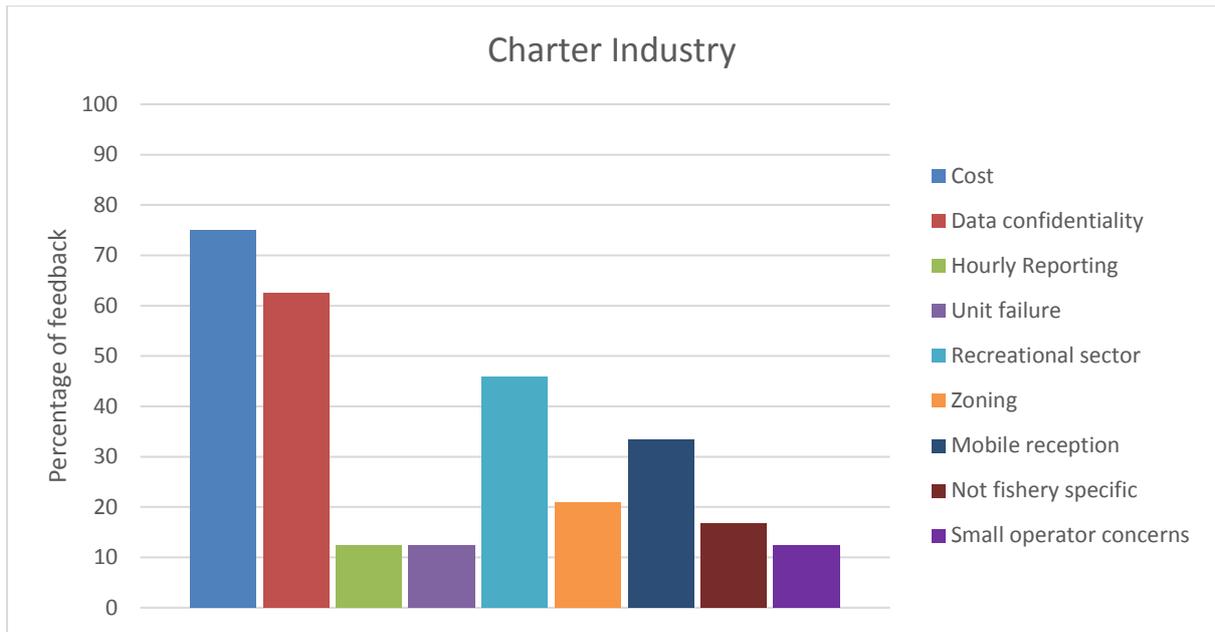
Key feedback

- The major concerns for fishers operating in line fisheries included hourly reporting, unit failures, mobile reception and the vessel tracking unit to be on the primary vessel and not the tender vessels due to the associated cost.
- 11% of stakeholders raised that they would like the attendance rule for tender boats that is currently set in legislation reviewed.



Key feedback

- The major concerns for fishers operating in crab fisheries included hourly reporting, unit failure, phone reception and airtime contracts.
- 15% of stakeholders also raised concerns that they do not carry a mobile phone or navigational plotter while undertaking commercial fishing activities.



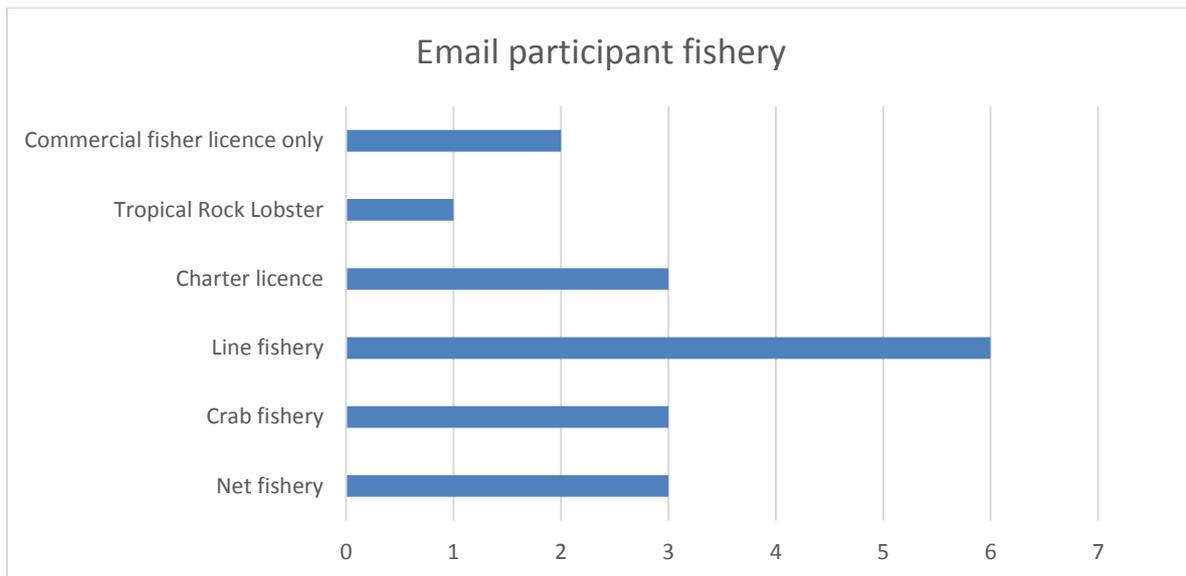
Key feedback

- The major concerns for fishers operating in the charter industry included cost, data confidentiality, recreational vessel tracking and mobile reception.
- To a lesser extent, concerns were raised about the draft policy not being fishery specific, concerns for small operators being forced to close due to costs, hourly reporting and unit failures.

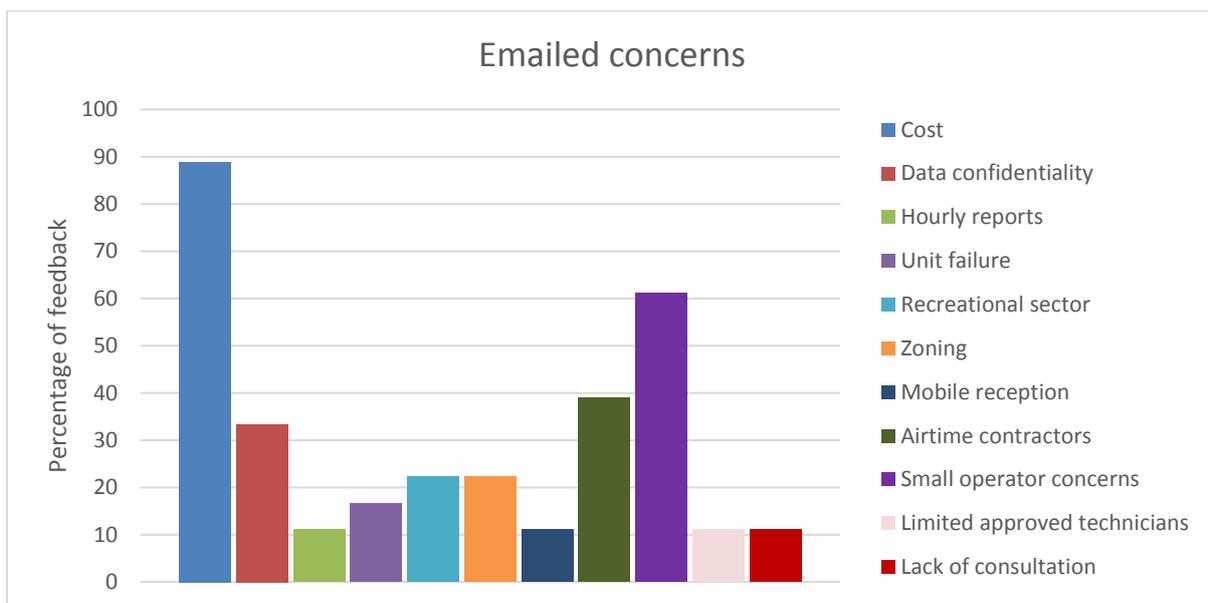
4.4 Email submission — feedback results

All feedback from emailed submissions were collated and the main concerns were extracted. As there was no predetermined format for email feedback, the responses were categorised in a similar manner to the industry meeting feedback.

The figure below demonstrates the breakdown of fishery participants. In emails where fishers failed to provide their participant fishery, information was extracted from Fisheries Queensland's licencing database. A total of ten individual emails were forwarded through to the nominated contact email. Please note some respondents participate in multiple fisheries, and secondly in a few cases a single email represented a group of fishers that were not listed in the email (e.g. Gulf of Carpentaria).



The figure below shows the percentage of stakeholders that raised concerns about a particular issue through email submission.



Key feedback

- The major concerns for stakeholders included cost, concerns for small operators being forced to close due to increased costs, airtime providers (and associated contracts) and data confidentiality.
- To a lesser extent, hourly reporting, unit failure, mobile reception, limited availability of approved unit technicians and lack of consultation around the requirement for vessel tracking were concerns that were also raised.

4.5 Other specific feedback

Comments and responses to questions from phone conversations, email correspondence, stakeholder meetings and the online submissions was gathered. This feedback is documented below.

Fishers appear to be feeling disconnected from the industry and have concerns that this policy impacts relations within industry and the community more broadly. They expressed concerns regarding the vessel tracking consultation itself. Specifically, that industry should have been consulted prior to the draft policy and guidelines through such means as working groups. A large proportion of fishers stated the vessel tracking policy makes them feel like criminals. There were also concerns that this will further drive big and small operators apart.

Fishers that support the introduction of vessel tracking, have suggested recreational, indigenous fishers and permit holders should also have a vessel tracking requirement. They also believed the cost should fall back onto government not be borne by fishers. Fishers also had requested that department's work together and try to incorporate a safety feature into the tracking units, and phase out the EPIRB requirement.

Small operators have expressed several concerns. Firstly, the distribution of funding between large and small scale operators may be skewed. Some operations do not carry navigation or mobile phone equipment, for damage or cost concerns, and this will render them uncontactable and unable to manually report in the event of a unit failing. Similarly, some fishers do not access their phones until they cease the operation. Solo operators (one-man fishers) believe the unit being attached to the primary boat (or CFBL) would be a reasonable policy as they do not have assistant fishers.

There was a substantial amount of fishery-specific feedback. Line fishery stakeholders would like to see that the 5nm attendance rule for tender vessels is reviewed in line with the introduction of vessel tracking. It was suggested that removing this rule would result in less pressure on the smaller reefs and improve sustainability. Operators in the ocean beach fishery were of the opinion that beach tenders should be exempt from the policy due to the operational distance restrictions and would like to see vessel tracking used as a form of priority evidence- an ongoing issue within this specific type of netting operation.

Gulf of Carpentaria and far-north Queensland fishers typically often operate for longer than 5 days (weeks to months), and this makes the proposed return-to-port direction more difficult.

The charter sector has raised concerns about the implication of unit failure as it relates to overall business productivity and industry operations. Notably, these operators feel unit failure, while in port, would reflect badly on their business image when paying customers cannot go out. This was particularly concerning for operators that are based in popular areas where customers often travel interstate to fish. Some charter operators also believed the implementation of vessel tracking will encourage operation outside of the rules (i.e. fishing instructors, lack of appropriate insurances). Additionally, some operators work under restricted permits (i.e. 50-day GBRMPA), and feel that annual polling costs are not proportionate to their fishing days.

A small minority of stakeholders were not happy with the vessel tracking unit being required when using the primary vessel recreationally – especially the return-to-port directions in the event of unit failure during a recreational trip; and, confusion regarding using two different symbols off one primary boat licence (i.e. netting and crabbing). Industry also raised concerns that airtime providers were not government regulated (therefore face potential for fee increases) and there were concerns for the reliability and durability of the proposed units.

4.6 Suggestions

Fishers made a number of suggestions of how the policy and guideline could be improved:

- A longer period between manual reporting instead of hourly as proposed. Reporting of 3, 6, 24 or 48 hourly was suggested with reporting rates increasing with unit failure (first unit failure equates to 6 hourly reporting, second malfunction equates to 3 hourly reporting) or a three-strike rule (on third failure the fisher is required to return to port).
- Fishers suggested unit transfers and pre-start poll check-ins needed to have a 24 hour capability given the 24 hour nature of fishing operations. A post-trip notification option was also suggested where reception was an issue.
- Fishers suggested manual reporting, unit transfers and pre-start polls are accessible on a commercial fishing smart-phone application, FishNet and SMS (*These options will be provided*). Fishers that operate without advanced technology (mobile phones, computers, etc.) requested these notifications can be conducted as a phone-in voice-mail service.
- To avoid operational downtime, and loss of income, fishers recommended exemptions be made to allow vessels to remain at sea, after a unit failure, for as long as they require but cannot return to sea once in port. Exemptions should be considered on a case-by-case basis where unit failures occur in port, to prevent loss of income (commercial fishers) or impact on clientele (charter). Fishers suggest operational downtime can be reduced if exemptions are granted for day-trip operators to return to sea while a new unit arrives (with proof of purchase). In addition, the charter sector suggested trip-basis exemptions for when operations are used for licence courses and dive trips as opposed to fishing trips. Similar suggestions include exemptions for all recreational fishing trips conducted on a commercial vessel.
- Fishers suggested the exclusion of vessels with an engine size less than 4HP (similar to licence/registration for Transport and Main Roads) or the implementation of vessel tracking on commercial fisher with compliance history only.
- Negotiate agreements with data providers for shorter or suspensible contract periods with airtime providers to reduce costs;
- Provide an option of placing a licence in 'no-boat' when the boat will be used recreationally for extensive periods of time (months) to reduce costs;
- Specific operational rules for day trip operators and multi day trip operators – to make policy more practical;
- Trade-offs should be considered for certain logbook requirements, once data validation using vessel tracking occurs (i.e. not having to report the location fished, no prior reporting through AIVR for quota);
- Ensure there is a distinction between penalties (i.e. malfunctions versus not having unit on board).