

Attention panel members.

I recently attended your meeting in Cairns to discuss the Independent Review of Domestic Commercial Vessel Safety Legislation and Costs and Charging.

re: Finding 3 and Recommendation 2 about Grandfathering arrangements.

The Current Situation section ignores the most important drivers for the lack of replacement of vessels in Queensland largest fishery, The East Coast Otter Trawl Fishery (ECOTF). This fishery has about 300 active vessels.

There are restrictions placed on vessel replacement by Fisheries Queensland that are designed to constrain the fishing power of vessels involved in this fishery. These restrictions apply to overall length and the volume (called Hull Units) of vessels. These restrictions have made the design of vessels that could do the job within the size constraints difficult, while still satisfying modern stability requirements. As a result, few new builds have occurred in this fishery until recently. The Hull Units limit was recently (in 2021) lifted from 70 to 120, allowing the design and construction of new vessels for this fishery to be safer and more efficient. Additionally, I have heard that it is the policy of the Great Barrier Reef Marine Park Authority to resist allowing larger vessel to operate in the marine park area of the ECOTF.

Further to this, the management of this fishery has seen fishery effort units decline to very low values in recent years. The initiation of the Sustainable Fishing Strategy has seen these units rise in value since 2017 but they are still low compared to other fisheries. This is because the management of the fishery has failed to address excess the effort allocation in the fishery (the ECOTF has about 3 million effort units, but less than 2 million are used in a normal year). Low licence values in this fishery due to over-allocation has reduced the overall value of businesses, which in turn affects these businesses ability to invest in new vessels.

These disincentives to invest in new vessels have played a big part in the ageing fleet not being replaced. Several of the vessels mentioned in the coroners reports were ECOTF vessels.

Another reason that existing vessels have stayed in the Grandfathering status rather than going into Transitional Survey is that the original arrangement to allow non-survey vessels to be surveyed according to standards that applied when they were last in survey has not been honored by AMSA or marine surveyors. In my experience, operators were told their vessels would need stability documents that were not required under that vessels original survey arrangements. This has stopped operators from re-entering the pre-existing survey arrangements due to the cost of generating stability documents and the risk of unknown modifications in the vessels past affecting the outcome of vessel assessments.

Any changes to the Grandfathering arrangements need to consider the risk to businesses in the process. It may be relevant to note that the ECOTF has had about 7 new vessels built recently with 2 more started since the change in hull units restrictions.

Thanks for your consideration.

Jim Newman.
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