



Australian Government

**Department of Climate Change, Energy,
the Environment and Water**

Mr Daniel Craig
A/g Executive Director
Office of Impact Analysis
Department of the Prime Minister and Cabinet
1 National Circuit
BARTON ACT 2600

Email: helpdesk-OIA@pmc.gov.au

Dear Mr Craig

**Impact Analysis – Commercial Fishing Vessel Monitoring Systems in
Australian Marine Parks – Second Pass Final Assessment**

I am writing in relation to the attached Impact Analysis (IA) prepared for Commercial Fishing Vessel Monitoring Systems in Australian Marine Parks.

I am satisfied that the IA addresses the concerns raised in your letter of 13 February 2024. Specifically:

- The title has been updated to “*Commercial Fishing Vessel Monitoring Systems in Australian Marine Parks: Impact Analysis*” to ensure the IA does not pre-empt the analysis, preferred option, and policy decision. The addition of “Commercial Fishing” has been added to provide clarity on the sector to which the IA applies.
- There is additional narrative around non-compliance potentially adversely affecting ecology / marine park values (*Page 5 Paragraph 2 & 4*) and additional narrative from the example litigation cases cited (*Page 12 Paragraph 3 & 4*).
- Where it is noted that commercial fishing activities make up approximately 60 per cent of domestic compliance incidents in Australian Marine Parks, a brief narrative around the incidents that contribute to the other 40 per cent has been added (*Page 5 Footnote 5*).
- The discussion around protected area experience has been moved to the policy options section (*Page 12 Section 8.2*).
- The role for government and the objective of government action has been consolidated and placed under a distinct section heading (*Page 6 Section 4*).
- Narrative has been added around the expected impact of maintaining the status quo and why a non-regulatory option such as an education campaign would be ineffective in the absence of the ability to detect and deter illegal fishing activity. (*Page 6 Section 5.1*).
- It has been made clearer who (industry or Government) will incur costs from each policy option (*Page 15 Table 2*).
- The regulatory costs to industry have been described in PV terms (rather than NPV) throughout the document.

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John Gorton Building, King Edward Terrace, Parkes ACT 2600 Australia
GPO Box 3090 Canberra ACT 2601 ABN: 63 573 932 849



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- Formatting issues with the table under heading 7.3.3. (*now 8.3.4 with additional of new sections*) has been corrected.
- The error in the annual cost estimates has been corrected and cost estimate figures have been rounded to avoid the perception of a high degree of precision. (*Table 6 Page 23*).

The regulatory costs are \$5,923,000 million per year.

Accordingly, I am satisfied that the IA is now consistent with the six principles for Australian Government policy makers as specified in the *Australian Government Guide to Policy Impact Analysis*.

I submit the IA to the Office of Impact Analysis for formal final assessment.

Yours sincerely

A handwritten signature in black ink that reads "Sean Sullivan".

Sean Sullivan
Deputy Secretary
Department of Climate Change, Energy, the Environment and Water

6 March 2024