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Dear Ewan

Thank you for the recent Fisheries Notice concerning the proposed mandatory implementation of Electronic Monitoring Systems (EMS) for licence holders in the Giant Crab Fishery (Western Zone), effective from 1 July 2025. I am sorry I didn't get around to reply sooner.

While we recognise and support the VFA's commitment to sustainable fisheries and responsible resource management, we wish to formally express our concern and opposition to the blanket application of this EMS requirement, and respectfully request the VFA consider exemptions or a more tailored approach for low-impact, compliant operators.

Our key concerns are as follows:

Cost Burden on Small Operators

The financial implications of installing, maintaining, and managing EMS equipment are significant, particularly for small, family-run businesses operating on tight margins. Unlike larger commercial operations, we lack the scale to absorb such added expenses without it severely affecting viability.

Existing Compliance and Low-Risk History

Our business has maintained full compliance with reporting, VMS requirements, and inspections. There has been no history of misconduct or breaches. Mandating EMS for operators with a proven track record of compliance seems unnecessarily punitive. Since we fish around Warrnambool, we have strong connections with fisheries' team which they constantly supervise us.

Privacy and Operational Intrusion

The use of continuous video surveillance, especially within confined and private workspaces, raises serious privacy and ethical concerns. The constant recording of crew activities may also create undue stress and interfere with normal operations. I will reiterate on the size of King Crabs we catch, it is very small to consider this exercise.

Disproportionate Impact Relative to Effort

Operators with limited crab quota, infrequent fishing trips, or historically low catch volumes (below 500 kg/year) should not be subject to the same requirements as high-effort licence holders. A one-size-fits-all model does not reflect the diversity of the industry.

We urge the VFA to consider one or more of the following:

Granting exemptions for inactive or low-catch licence holders.

Offering a cost-sharing scheme or financial assistance for small operators.

Exploring alternative compliance options (e.g. periodic audits, logbooks, enhanced VMS).

We remain committed to sustainable fishing practices and open communication with regulators. However, policies must be practical, proportionate, and economically viable for all stakeholders, not just the most well-resourced.

We welcome the opportunity to engage further and provide input on more balanced compliance strategies.

Regards

Simon Chan



