15July 2026

Mr Luke O'Sullivan
Acting Chief Executive Officer
Director, Fisheries Management and Boating
Victorian Fisheries Authority
By email: luke.osullivan@vfa.vic.gov.au

Subject: TSF submission on the DRAFT Fisheries (Abalone Data Logging Systems) Notice

Dear Mr O'Sullivan,

Thank you for your letter of 7 July 2026 responding to the questions Tasmanian Seafoods Group (TSF) raised on 25 June. This is **TSF's formal submission on the draft Fisheries (Abalone Data Logging Systems) Notice 2026,** lodged ahead of the 17 July deadline.

TSF supports well-governed spatial and effort data, linked to appropriate decision tools and has said so in its Central and Western Zone submissions. **What TSF cannot support is the sequence the Notice proposes:** a fishery-wide capital and operating commitment, commencing 1 September 2026, ahead of a known cost, completed consultation, or built and tested decision tools**. TSF asks that commencement be deferred until those three matters are resolved.**

1. The 7 July responses confirm the proposal is not ready to be mandated

Read together, the 7 July answers tell a consistent story. On cost, the responses are that final implementation costs and funding arrangements "are still being worked through" (7(a), 7(d)), that a final cost estimate "is still being worked through" (9(a)), and that ongoing operational costs "are still being worked through" (9(e)). On how the data will actually be used, the answers are that any analytical tools, development timetable and validation processes "will be developed as part of the implementation should the proposal proceed" (4(a), 4(b)), and that quality assurance "would be applied" at some future point (5(a)). On data governance, the answers are that arrangements are "in development" and "would be developed… should the proposal proceed" (2, 3(a), 3(b), 6(a), (c)).

These are answers about what will happen after a decision is made. They are not the information a stakeholder needs in order to form a view before the decision. A mandate is the one of the most binding instrument available to VFA. It is difficult to see how consultation consistent with the principles in section 3A of the Fisheries Act 1995 can be meaningful when the cost, the funding source, the data-governance framework and the decision tools are all still to be settled. TSF's position is that the design and costing come first, and the mandate, if it is justified, comes after.

2. Cost and cost-recovery — the industry is being asked to commit funds it cannot see

The Notice arrives at a particularly difficult time for the industry to absorb an open-ended cost. The global abalone market is severely depressed. Beach prices have fallen materially since early 2024 under sustained competition from farmed product, the Central Zone is under-catching its TACC, and operators across all three zones are under real commercial pressure. In that environment, every dollar of industry money committed to compliance hardware is a dollar not available for stock assessment, the FIS, or market work.

Against that backdrop, response 9(c), that questions about ACV's funding "should be directed to ACV", coupled with the statement that ACV "have indicated they will contribute to the purchase of the units", is not adequate. **ACV's funds are industry funds**, collected through a compulsory levy. If levy money is being committed to this program, **industry is entitled to know how much, from which line, and on whose authority**, before the commitment is treated as settled. **We have written to ACV separately seeking exactly this, and that request is outstanding.**

Before TSF can support any mandate, we ask VFA to publish:

- the total estimated cost of the program — procurement, installation, maintenance, data storage and management, and the development of the analytical tools, with a full breakdown;
- the split of that cost between VFA, ACV and individual operators, identifying any component drawn from levy or cost-recovery funds and the quantum involved; and
- the estimated ongoing annual recurrent cost and how it will be funded.
- the estimated impacts & losses, the implementation will have on other funded programs.

The principle we raised on 25 June still applies: where a program is funded by industry contributions, the people whose money is being committed should be consulted before the commitment is made, not invited to comment after it.

3. Consultation — the record does not yet support the claim that this came from industry

Response 1 states that the proposal "has been bought [sic] to the VFA from the industry representative zonal groups", and your email of 30 June described the mandate as a topic of conversation "with executive officers of zonal representative groups" over a number of years. TSF does not doubt that conversations occurred. But a conversation with an executive officer is not the same thing as documented consultation with the licence and quota holders who fund the fishery and would carry the cost.

To test the point rather than assume it, TSF has written to the two bodies of which it is a member or contributor. On 6 July we asked the Abalone Council Victoria to provide the underlying proposal document and to confirm what consultation it undertook with funding stakeholders before forming and advancing a position. On 9 July we asked the Western Abalone Divers Association to confirm, under its own Rules, whether it resolved to make any representation on the Notice and whether it consulted its members, including TSF, before doing so. At the date of this submission, neither request has produced the records sought. TSF also notes that at the Central Zone TACC forum on 9 April 2026, Abalone Victoria (Central Zone) which, on TSF's estimate from published levy contributions, represents and communicates with, a significant per cent of the Victorian abalone levy base, recorded its opposition to the Succorfish arrangement on privacy, security and data-storage grounds. That is in VFA's own meeting record.

The strength of VFA's consultation position depends on what those bodies actually did. If the representations relied on were made without member consultation, then the "industry brought this forward" account does not hold. TSF asks VFA to confirm, in writing, which bodies and which stakeholders were consulted at the design stage, and at what point.

4. The decision-support tools do not yet exist

This is, for TSF, the substantive point. The stated purpose of the data is to improve stock assessment and TACC setting. Yet responses 4(a) and 4(b) confirm that how the Succorfish and diver-logger data will be incorporated into assessment "will continue to be refined should the proposal proceed", and that the analytical tools, development timetable and validation processes are yet to be built. In other words, the fishery would be mandated to buy and operate equipment that feeds decision tools which have not been designed, built or validated, and whose place alongside the existing CPUE standardisation is undecided.

Mandating the collection before designing the use inverts the proper order. It also exposes the industry to the risk of paying for a data stream that is later found to add little, or to require a different device or configuration. TSF asks that the intended decision tools be specified and validated, consulted with stakeholders, and their relationship to the current assessment framework settled, before any collection mandate takes effect.

5. Device continuity and value-for-money remain open

Response 8 states that VFA considered a range of technologies and found the proposed system suitable, but no comparative assessment has been shared. TSF notes that the specified device, the Succorfish SC2, is presently being withdrawn from service in the United Kingdom: onward transmission of its data to the Marine Management Organisation stopped in August 2025 and was never restored, and the MMO has since funded affected vessel owners to move to a different, competing device (Marine Management Organisation, 'Inshore Vessel Monitoring System (I-VMS) devices for under-12 metre fishing vessels registered in England', GOV.UK guidance, **updated 11 June 2026).** A regulator moving away from this device while VFA moves to mandate it is directly relevant here, and TSF asks whether VFA has assessed the continuity and contractual risk it illustrates.

It also sharpens the value-for-money question TSF has now asked twice. Before committing the fishery to one supplier, has VFA undertaken a cost-per-unit-of-information comparison of the available options, including the existing ORBCOMM framework, have VFA considered Australia suppliers*, (TSF is aware of at least one Australian supplier whose equipment could provide the same data)*, and were operators with direct experience of alternative systems consulted in that assessment? **TSF has that experience and remains willing to contribute it.**

6. Data ownership, access and the earlier disclosure incident

The 7 July responses do not resolve the ownership question (2) or the access question (3). Response 3(c), that the initiative "does not involve the sharing of individual operator data" does not address the specific matter TSF raised on 25 June 2026: an instance in which commercially sensitive operational data provided for fishery-management purposes was somehow, subsequently shared with competing diving operators.

Reassurance about intent is not the same as enforceable protection. TSF asks that any data framework attaching to a mandate include express, legally enforceable prohibitions on operator-level disclosure, with defined consequences, and that operator ownership of individual data be stated in the framework rather than left to implementation.

7. What TSF is asking for

(a) Defer the 1 September 2026 commencement date.

(b) Publish the full cost, the cost-recovery split and the recurrent-cost estimate and identify the source and authorisation of any levy or ACV funds to be applied.

(c) Specify and validate the decision-support tools and settle how the data will sit alongside the existing assessment, before any collection mandate takes effect.

(d) Undertake a value review of current data collection and decision-making tools, to identify the most cost-effective and effective and efficient management tools and how they would be able to support the stakeholders, and abalone resources.

(e) Complete and document genuine consultation with licence and quota holders across all three zones, and confirm the design-stage consultation record.

(f) Release the outcomes of the VFA governance review. Previously listed for release and update at the CZ TACC meeting. *(9-4-26)*

(g) Share the technology comparison, including the continuity and value-for-money assessment, and the data-governance and ownership framework, for comment before a decision is made.

Thank you for considering these requests. We would welcome the opportunity to meet with you and other VFA representatives to discuss the interim arrangements and review parameters.

Yours sincerely,

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