



Australian Government

Australian Fisheries Management Authority

National Compliance and Enforcement Program

2023–2025

Securing Australia's fishing future

www.afma.gov.au



Contents

<i>National Compliance and Enforcement Program</i>	1
Abbreviations.....	3
1. Introduction	5
1.1 <i>Why is compliance important to the industry?</i>	7
1.2 <i>AFMA's approach</i>	7
1.3 <i>Risk assessments</i>	8
1.4 <i>2022-23 NCEP shortfalls and remedial actions</i>	9
2. Education & Engagement Program	10
2.1 <i>Background</i>	11
2.2 <i>National compliance education and engagement activities</i>	11
2.3 <i>2022-23 NCEP shortfalls and remedial actions</i>	13
3. General Deterrence Program	14
3.1 <i>Background</i>	15
3.2 <i>Aim</i>	15
3.3 <i>Objectives</i>	15
3.4 <i>Methodology</i>	15
3.5 <i>2022-23 NCEP shortfalls and remedial actions</i>	15
4 Targeted Risk Program.....	17
4.1 <i>Background</i>	18
4.2 <i>Compliance Risk Management Teams (CRMTs)</i>	18
4.3 <i>Failing to record bycatch discards</i>	19
4.4 <i>Quota evasion</i>	20
4.5 <i>Torres Strait Fishery (TSF)</i>	22
5. Maintenance Programs.....	26
5.1 <i>Background</i>	28
5.2 <i>Business as usual programs</i>	28
6. Performance Assessment	32
6.1 <i>Internal review and audit program</i>	33
6.2 <i>Program targets</i>	33
6.3 <i>Education and communication performance targets</i>	35
6.4 <i>General deterrence performance targets</i>	36
6.5 <i>Targeted risks performance targets</i>	37
6.6 <i>Business as Usual (BaU) performance targets</i>	39
6.7 <i>Internal review and audit program</i>	42
7. Previous Performance.....	43
7.1 <i>Communication/education</i>	44
7.2 <i>General deterrence performance targets</i>	45
7.3 <i>Targeted risks performance targets</i>	47
7.4 <i>Maintenance Programs – Business as Usual (BaU)</i>	50

Abbreviations

Abbreviation	Explanation
AFZ	Australian Fishing Zone
AFV	Australian Fishing Vessel
BaU	Business as usual
BSCZSF	Bass Strait Central Zone Scallop Fishery
CCAMLR	Commission for the Conservation of Antarctic Marine Living Resources
CDRs	Catch Disposal Records
CRMT	Compliance Risk Management Team
CTS	Commonwealth Trawl Sector
EM	Electronic Monitoring System
ETBF	Eastern Tuna and Billfish Fishery
FRP	Fish Receiver Premises
GD	General Deterrence
GHaT	Gillnet Hook and Trap Fishery
HIMI	Heard Island and McDonald Islands Fishery
MRAI	Multiple Risk Aggregation Index
NCPU	AFMA's National Compliance Planning Unit
NGOs	Non-Government Organisations
NIU	AFMA's National Intelligence Unit
NPF	Northern Prawn Fishery
OMC	AFMA's Operational Management Committee
RFMO	Regional Fisheries Management Organisation

Abbreviation	Explanation
SBTF	Southern Bluefin Tuna Fishery
SFR	Statutory Fishing Right
SPF	Small Pelagic Fishery
TAC	Total Allowable Catch
TAE	Total Allowable Effort
TEP	Threatened, Endangered and Protected
The FM Act	<i>Fisheries Management Act 1991</i>
The FMR 2019	<i>Fisheries Management Regulations 2019</i>
The TSFA Act	<i>Torres Strait Fisheries Act 1984</i>
The TSFR 1985	<i>Torres Strait Fisheries Regulations 1985</i>
The Policy	<i>National Compliance and Enforcement Policy</i>
TSF	Torres Strait Fisheries
TSO	Temporary Switch Off
VMS	Vessel Monitoring System
WDTF	Western Deepwater Trawl Fishery
WTBF	Western Tuna and Billfish Fishery

1

Introduction



The Australian Fisheries Management Authority (AFMA) National Compliance Operations and Enforcement Policy (the Policy) aims to:

'Effectively deter illegal fishing in Commonwealth fisheries and the Australian Fishing Zone'



To achieve this objective, AFMA uses a risk based National Compliance and Enforcement Program to deliver cost effective and efficient compliance services.

The 2023–25 program has four major components:

1. Education and engagement
2. General deterrence
3. Targeted risks, and
4. Maintenance

A key component of the 2023–25 compliance and enforcement program is the delivery of the National Compliance Education and Engagement Strategy. The aim of the strategy is to establish AFMA's approach to industry engagement, assist industry in understanding their obligations, and demonstrate to the public the actions taken by AFMA to protect Australia's fisheries resources.

The General Deterrence program in 2023–25 will consist of a series of inspections and patrols targeting identified high risk ports, boats, and fish receiver premises.

The Targeted Risk program for 2023–25 will focus on the risks of:

- failing to record bycatch discards,
- quota evasion, and
- the Torres Strait Fishery (TSF).

Each of the targeted risks will be the focus of a Compliance Risk Management Team (CRMT) that will develop and implement multifaceted strategies designed to assess, address, and control each risk to reduce them to acceptable levels.

In addition, previously 'treated' risks will remain the focus of maintenance programs. These include:

- quota reconciliation
- fishing/navigating in closed areas
- failure to report interaction/retention of protected or prohibited species,
- bycatch mishandling, and
- failure to have a AFMA Vessel Monitoring System (VMS) or Electronic Monitoring (EM) system on board or have it operating at all times

The four components of the program, including the targets within the 'targeted risk' component program, will have clear and discernible aims, objectives and, importantly, documented performance measures to enable their effectiveness to be measured.

Together, the 2023–25 program will provide a sound framework for the delivery of effective compliance and monitoring within Commonwealth domestic fisheries.

1.1 Why is compliance important to the industry?

Commonwealth domestic fisheries rules and regulations are designed to protect:

- the public resource (e.g., fish stocks)
- net economic returns to the Australian community and
- the broader environment.

1.2 AFMA's approach

In accordance with the objectives as set out in the [AFMA National Compliance and Enforcement Policy](#) (the Policy), AFMA is continuing with its risk-based compliance and enforcement program in 2023–25. The risk-based approach includes targeted risk programs based on biennial risk assessments, ongoing monitoring and maintenance, and business as usual.

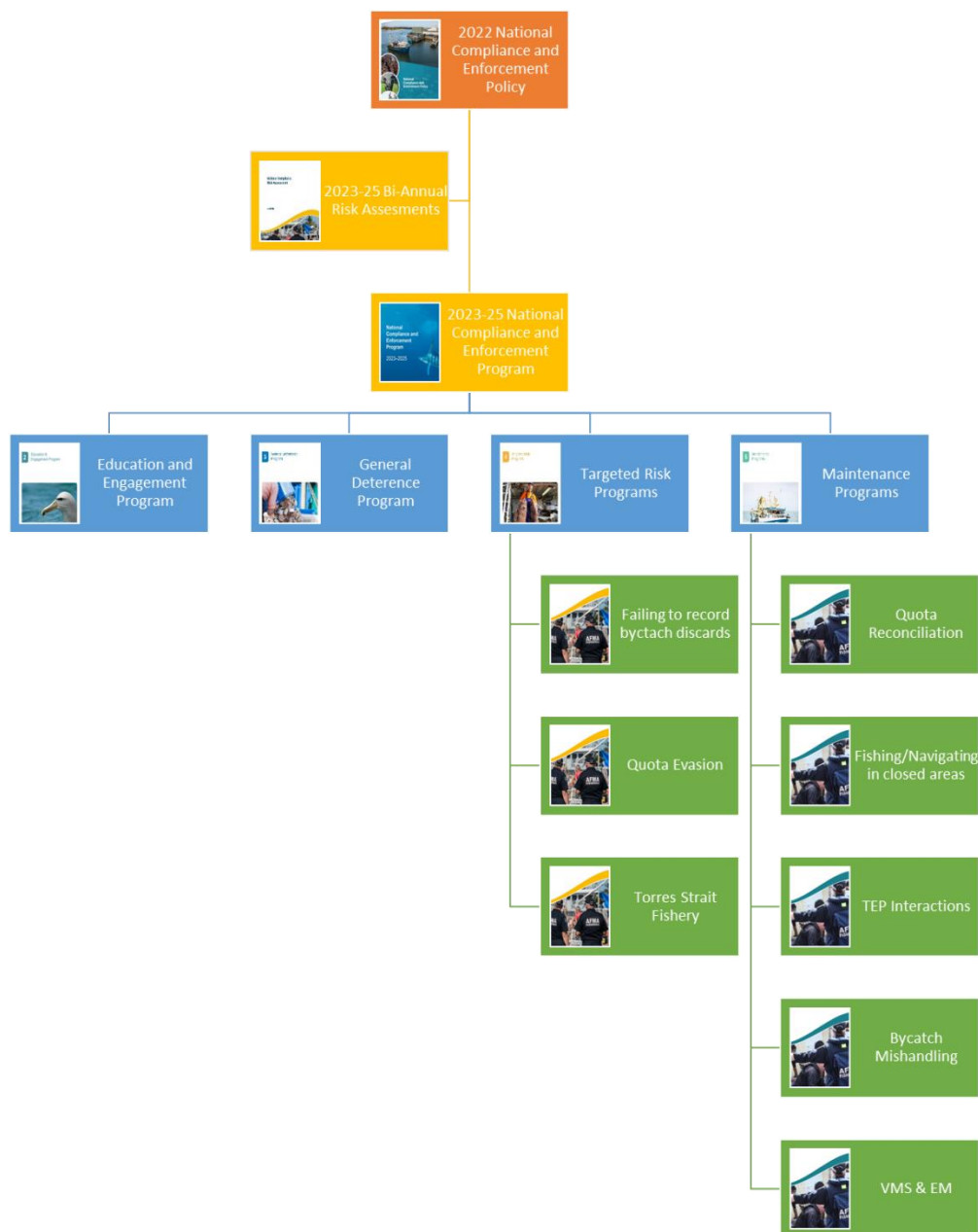


Figure 1: Structure of AFMA’s risk-based compliance program

1.3 Risk assessments

The 2023–25 risk assessment was undertaken in September 2022 and included consultation with key stakeholders. Ongoing monitoring and review will be undertaken during the year to ensure that any new or emerging risks are identified and managed effectively.

1.3.1 Monitoring fisheries operations

AFMA monitors the compliance of concession holders with fisheries regulations across Commonwealth fisheries. Non-compliance through contravention of the *Fisheries Management Act 1991*, the *Torres Strait Fisheries Act 1984*, and related legislative instruments, is identified through the analysis of various information sources, including:

- the public
- the fishing industry
- non-government organisations
- other State and Commonwealth government agencies
- AFMA's dedicated information lines (e.g. CRIMFISH – 1800 274 634)
- regular, random and/or targeted patrols
- inspections, monitoring (including electronic monitoring (EM)), and surveillance
- audits
- targeted analysis and/or investigations, and
- observations by AFMA fisheries officers.

AFMA will also continue to build and maintain strategic partnerships with other agencies to maximise cooperation in fisheries law enforcement.

1.3.2 Maintenance programs

AFMA's maintenance programs ensure that previously significant risks do not resurface or pose a threat to the sustainability of the fishery.

Maintenance programs in place are:

- quota reconciliation
- fishing/navigating in closed areas
- bycatch mishandling
- failing to report threatened, endangered and protected species interactions, and
- compliance with VMS and EM requirements.

These 'business as usual' maintenance programs will continue to be monitored.

1.4 2022-23 NCEP shortfalls and remedial actions

It has been identified that several objectives and/or performance targets¹, outlined in the 2022-23 NCEP, were not achieved. To the extent these form part of the 2023-25 NCEP, additional remedial action will be applied to remedy and/or prevent those shortfalls from re-occurring. The areas requiring remedial action include;

- AFMA did not meet its target of publishing monthly compliance focus "feature articles" on the AFMA website,
- AFMA did not meet its target of re-inspecting 100% of vessels and Fish Receiver Permit (FRP) operators, with adverse inspection outcomes, within three months of the original adverse inspection,
- AFMA did not complete undertaking baseline measurements for the *Bycatch Discards* and *Torres Strait Fishery* CRMT programs,
- AFMA did not complete the development and delivery of educational material on logbook and CDR requirements/benefits as part of the *Torres Strait Fishery* CRMT programs.

¹ See 'summary of previous performance' (pg. 41)

2

Education & Engagement Program



2.1 Background

AFMA recognises that communication and education are critical components of any successful compliance and enforcement program. Engaging with stakeholders assists in maximising voluntary compliance and ensures that the fishing industry have an understanding and an investment in the measures that affect them.

The National Compliance Education and Engagement Strategy will be consistent with the goals of AFMA's broader communication strategy and may be supplemented by specific targeted programs established to address key risks.

2.2 National compliance education and engagement activities

2.2.1 Aims/Objectives

Consistent with AFMA's objectives and functions, the 2023–25 National Compliance Education and Engagement Strategy aims to:

- highlight to industry and the broader public the risks being targeted in 2023–25
- demonstrate AFMA's commitment to enforcement fisheries regulations
- reduce any misconception by deliberate offenders that they won't be caught
- educate industry, other direct stakeholders, and the public about the impacts of non-compliance on fisheries sustainability and industry viability, and
- increase industry's willingness and capacity to comply with the relevant requirements.

2.2.2 Methods

2.2.2.1 AFMA media feature/Facebook posts

AFMA's website and Facebook will be the central point for stakeholders seeking information about AFMA's fisheries and compliance framework and activities.

The monitoring and enforcement page of AFMA's website contains key information that assists industry to meet their obligations and is regularly updated to ensure the information is accurate. AFMA Facebook will be the main medium for providing regular messaging on compliance issues and updates on AFMA compliance activities.

In addition to publishing the biennial National Compliance and Enforcement Program, regular (monthly) articles will be published on the website/Facebook and will detail compliance focus activities.

2.2.2.2 Media releases/Facebook posts

The National Compliance team will prepare media releases and Facebook posts on:

- targeted enforcement program(s)
- court outcomes and/or penalties, and
- the results of any major/joint operation(s).

AFMA media releases will be distributed to subscribers, relevant regional and national media outlets depending on the nature/localities of the item of interest. Media releases will also be shared on [AFMA's Facebook page](#).

2.2.2.3 Targeted SMS

SMS messaging will be used as part of monthly targeted campaigns to remind concession holders and skippers of their obligations and to advise of monthly compliance targets.

2.2.2.4 National compliance education and engagement activities

Fisheries officers will use the opportunity during in-field inspections to reinforce AFMA's areas of focus, including providing technical advice/support to operators to ensure they are aware of their obligations under fisheries legislation. In-field activities also provide an opportunity for industry to raise matters of concern with officers and to discuss possible solutions to enhance the management of the fishery.

2.2.2.5 Community fishing events

Staff will attend community fishing events and provide information of AFMA's Compliance Program. AFMA fisheries officers will also attend Seafood Directions as part of the community engagement events.

2.2.3 EM seabird conditions

2.2.3.1 Targeted Media/Social releases

The National Compliance team will prepare media releases and Facebook posts on:

- targeted enforcement program(s)
- court outcomes and/or penalties and
- the results of any major/joint operations, and
- E-Monitoring non-compliance.
- Concession conditions for the Eastern Tuna and Billfish Fishery (ETBF) fishing season and specifically those conditions relating to seabird reporting and mitigation.

Media releases will be distributed to subscribers to AFMA's media releases and relevant regional and national media outlets depending on the nature/localities of the item of interest. Media releases will also be shared on AFMA's Facebook page.

2.3 2022-23 NCEP shortfalls and remedial actions

In 2022-23, AFMA did not meet its target of publishing monthly compliance focus “feature articles” on the AFMA website, with only 9 articles published in 2022-23.

Noting that resource availability limited the number of focus articles published in 2022-23, the Education and Engagement team have, within the 2023–25 National Compliance Education and Engagement Strategy, instituted the following remedial actions.

- identified key baseline topics and items for compliance focus articles, and
- ensured that capacity remains for additional feature articles for key emerging issues and/or dedicated CRMT requirements.

3

General Deterrence Program



3.1 Background

In addition to the risk treatment program(s), AFMA maintains a General Deterrence (GD) program. By maintaining a general presence across Australia's ports, AFMA discourages members of the fishing community who do not wish to comply with the rules and regulations in each fishery from undertaking unlawful activity.

AFMA's presence also reassures those who are complying that non-compliant activity is likely to be detected. AFMA fisheries officers can also assist those wishing to comply by providing advice and/or instruction(s) on their responsibilities.

To ensure the general deterrence/presence role is maintained, the GD program will consist of a series of inspections and at-sea/aerial patrols designed to target identified high risk ports, boats, and fish receiver premises.

3.2 Aim

To encourage compliance and deter non-compliance by providing a high visual profile presence of fisheries officers in port.

3.3 Objectives

The key objectives of the program are:

1. To maintain a high visual presence, particularly in high and moderate risk ports.
2. To conduct a comprehensive program of inspections with a particular focus on high-risk boats and fish receiver premises (FRP).
3. Ensure that vessels and FRP's operators with adverse inspection outcomes are subject to rapid re-inspection.
4. To maximise voluntary compliance through the application of innovative compliance approaches and education.

3.4 Methodology

In port and at-sea/aerial patrols will be planned during the 2023–25 years to target the 'high risk' ports, FRP's, and boats. This will maintain a visible presence at each of the 30 plus ports used by the Commonwealth fleet.

3.5 2022-23 NCEP shortfalls and remedial actions

In 2022-23, AFMA did not meet its target of re-inspecting 100% of vessels and Fish Receiver Permit (FRP) operators, with adverse inspection outcomes, within three months of the original adverse inspection.

Noting that resource availability limited the ability of officers to re-inspect these operators within the timeframe allowed, the general deterrence team will institute the following remedial actions.

- The GD team will work to ensure a continued focus on physically re-inspecting these operators, and
- where physical inspection is not possible within the timeframe allowed, these operators will be targeted within a program of 'desktop' inspections.

4

Targeted Risk Program



4.1 Background

In accordance with the [National Compliance and Enforcement Policy](#), AFMA has adopted a risk based compliance approach. This approach enables AFMA's resources to be deployed to target areas when required and where most effective. It involves a series of steps to identify and assess non-compliance risks and then applies appropriate actions to mitigate these risks.

The methodology used for risk analysis is detailed in AFMA's [National Compliance Risk Assessment Methodology 2023–25](#).

Compliance Risk Management Teams (CRMT's) are formed in response to risks identified by the biennial risk assessment and prioritised for action (in the National Compliance Program) by the Operational Management Committee (OMC).

The 2023–25 domestic compliance risk assessment identified risks across Commonwealth fisheries that were assessed as moderate and moderate/high. The identified risks were further discussed by the OMC with four risks prioritised for treatment.

The prioritised risks of the 2023–25 program are:

- Risk 1 – Failure to record bycatch discards (risk rating: moderate/high)
- Risk 2 – Quota Evasion (risk rating: moderate/high)
- Risk 3 – Torres Strait Fishery (risk rating: moderate/high)

4.2 Compliance Risk Management Teams (CRMTs)

AFMA's CRMTs are multi-disciplinary, and/or multi-agency, teams created to develop and implement the treatment programs to address identified priority risks. The CRMT composition is determined by the nature of the risk being addressed and/or the type of program needed to address the risks.

The OMC determines the makeup of the CRMTs on a case-by-case basis, however, a CRMT will typically consist of:

- fisheries officers
- intelligence officers
- planning officers, and
- fisheries management officers.

CRMT's may also include AFMA staff from other disciplines (such as environment, IT, policy or media staff), staff members from relevant external agencies (e.g. Department of Agriculture, Fisheries and Forestry, State agencies etc.) and/or industry representatives.

A CRMT team leader will be appointed to manage the overall team and to act as a representative for the team at OMC meetings as required.

4.3 Failing to record bycatch discards

4.3.1 Background

AFMA is committed to bycatch reduction, improved protection for threatened, endangered and protected species minimising any adverse impacts of fishing on the marine environment. Commercial fishing may result in incidental catch or interaction with species that are not retained for sale or are not able to be sold (non-commercial) and is discarded.

AFMA encourages the fishing industry to play an active role in bycatch management, through reporting, logbook requirements, developing and implementing codes of practice, supporting research, developing and trialling mitigation devices, and undertaking education within and across industry sectors.

Failing to report bycatch discards places constraints on data and presents significant challenges to bycatch management. Failure to manage bycatch discards may have a negative impact on the status of marine life including mammals, reptiles, seabirds, sharks, and bony fish. Some species populations may be detrimentally impacted when subject to additional mortality from fishing and other sources.

4.3.2 Aim

To decrease the incidence of, and therefore the risk associated with, non-reporting of bycatch in all Commonwealth fisheries through a targeted education, monitoring, and enforcement program.

4.3.3 Objectives

The key objectives of the program are to:

1. To identify issues that prevent operators adhering to reporting requirements.
2. To undertake a comprehensive education and communication program with industry that reinforces the below requirements:
 - a. report all by catch and discard interactions
 - b. report discarded quota species.
3. To decrease the incidences of confirmed non-reporting of bycatch discards, and
4. To continue to develop and implement effective arrangements to prevent/control non-reporting of bycatch,

4.3.4 Methodology

It is proposed to take a four-phase approach to address the issue of non-reporting of bycatch.

1. Through the inspection process and port visits, AFMA officers will consult with Fishers and other stakeholders to seek feedback and identify obstacles and other factors preventing operators adhering to reporting requirements,
2. Complete baseline measurements within the major fisheries,
3. Undertake a comprehensive education and communication program with industry to outline the risk of non-reporting of bycatch, and
4. Continue with developing and implementing effective legislative and other arrangements to prevent/control non-reporting of bycatch.

4.3.5 2022-23 NCEP shortfalls and remedial actions

AFMA did not complete its 2022-23 objective of undertaking baseline measurements of bycatch discards in the major Commonwealth fisheries.

Noting that technological and resources constraints limited the ability of the intelligence team to complete these baseline measurements, the CRMT will institute the following remedial actions;

- the Intelligence team will continue to work with AFMA's Data transformation project team to help improve AFMA's data extraction and analysis capabilities, and
- the Intelligence team will continue with completing baseline analysis works as outline by the CRMT team.

4.4 Quota evasion

4.4.1 Background

AFMA is responsible for effectively managing Commonwealth fisheries to achieve ecological and economic sustainability. As part of this responsibility, AFMA administers a program for recording the take of quota species.

4.4.2 What is quota evasion?

Quota evasion is recognised as fraud against the Commonwealth. Fraud is an act where a person dishonestly obtains a benefit, or causes a loss, by deception or other means. All Commonwealth fishers are required to accurately report their catch to AFMA through the Catch Disposal Records (CDRs). Quota evasion is the deliberate misreporting, or non-reporting, of the weight and species of catch caught in Commonwealth waters.

4.4.3 Why is quota evasion a risk?

Quota managed fisheries are largely dependent on the reliability and accuracy of information provided by fish receiver premises through the CDR's. Without reliable, accurate and honest information, the quota regime cannot operate effectively, and this may have detrimental impacts on the ongoing sustainability of the natural resources.

4.4.4 Aim

To decrease the incidence of, and therefore the risk associated with, quota evasion through a series of targeted treatment programs.

4.4.5 Objectives

To decrease the incidence of, and therefore the risk associated with, quota evasion through a series of targeted treatment programs.

4.4.6 Methodology

The key objectives of the program are to:

- develop and implement data analysis tools/mechanisms to identify targets of interest for quota evasion
- conduct regular surveillance program(s) to provide indicators as to the current level of quota evasion and identify targets of interest for quota evasion, and
- continue to deliver targeted education and communication items focusing on the risk of quota evasion.

4.4.7 Methods

In addition to preventative measures undertaken as part of the general deterrence program, the quota evasion CRMT will develop and/or conduct:

- automated data matching techniques to provide indicators/incidences of possible quota evasion, and
- an ongoing quota evasion 'surveillance program' to search for incidences and assess the quantum, of quota evasion in quota managed fisheries.

Any identified targets will be routinely referred to the operations team for investigation. In addition, an annual assessment of the likely quantum of quota evasion will be made using analysis of surveillance information.

4.5 Torres Strait Fishery (TSF)

4.5.1 Background

AFMA has the responsibility for delivering the domestic fisheries compliance functions in the Torres Strait. The major Torres Strait fisheries are the:

- Tropical Rock Lobster (TRL)
- Northern Prawn (NPF)
- Beche De Mer (BDM) and,
- Finfish.

The TRL fishery is subject to a sectoral split between Traditional Inhabitant Boat (TIB) license holders and Transferable Vessel Holder (TVH) licenses. The TVH sector are non-traditional inhabitant owner/operators.

The Torres Strait Fishery (TSF) is unique in that it is managed by the Torres Strait Protected Zone Joint Authority (PZJA) and is complex in nature. It is a mix of several commercial and traditional fisheries, used by a mix of participants (Traditional Inhabitants, non-traditional inhabitants, and Papua New Guineans), and managed by a mix of agents (the Protected Zone Joint Authority (PZJA), National Fisheries Authority Papua New Guinea (NFA), and AFMA).

Fisheries within the Torres Strait Protected Zone are subject to the provisions of the *Torres Strait Fisheries Act 1984* (TSFA), which differs to provisions the *Fisheries Management Act 1991* (FMA) and Torres Strait Fisheries Regulations 1985 (TSFR). The TSFR's are currently being amended in some respects to improve consistency between the TSFA and FMA in future years.

AFMA has recently increased its staffing resources in Thursday Island to improve capability in the management and compliance of Torres Strait Fisheries. Other changes such as moving to mandatory reporting by the traditional inhabitant sector and VMS on all licensed boats are subject to stakeholder consultation, and should these changes be introduced in coming years it will be a major step forward in the better management of the TSF.

4.5.2 Identified priority Torres Strait Fishery risks

There are three priority risks identified for treatment under the TSF CRMT Program in 2023–25. These three risks are:

1. failure to accurately complete Logbooks or Catch Disposal Records
2. unlicensed fishing or fish receiving, and
3. catching/Retaining no take/restricted take species.

These three risks are highly interrelated, but with much of their impacts relating back to inaccurate records of catch taken. Without accurate records of catch, bycatch and effort, the ability of AFMA to manage the fishery(s) in a sustainable manner is significantly

hampered. Additionally, the risk of inaccurate catch records means that AFMA must be more cautious when setting catch limits, potentially hampering the ability of the community to obtain the maximum (sustainable) economic benefits from those fisheries.

Risk 1. Failure to accurately complete Logbooks or Catch Disposal Records

Without accurate records of catch, bycatch and effort, the ability of AFMA to manage the fishery(s) in a sustainable manner is significantly hampered. With just over 80 per cent of fishers in the Torres Strait holding TIB licences, and with the completion of fishing logbooks being voluntary for those fishers, there is very limited effort, bycatch, and spatial data available for most of the fishing activity across Torres Strait.

It is important, therefore, that AFMA works to ensure that all CDRs and (compulsory) logbooks are completed accurately. Additionally, it is also important for AFMA to work with Traditional fishers to raise the level of voluntary completion of daily logs across TIB fishers.

Aim

To increase the level of reported catch and effort data available within Torres Strait Fisheries.

Objectives

The key objectives of the program are to:

- ensure compliance with all compulsory CDR and Logbook requirements, and
- increase the rate of voluntary completion of daily logs by TIB Fishers.

Methodology

The foundation of AFMA's enforcement approach is education, helping willing operators to comply with management arrangements (the base of the compliance pyramid). Targeted education, monitoring and enforcement will form the basis for the compliance program.

Education

A focus on increasing compliance education in the Torres Strait Fishery (TSF) through:

- development/expansion of educational material relating to CDR and logbooks in the Torres Strait targeting fish receivers on the resource sustainability of fisheries and the importance of accurate data collection, and
- on-going dialogue with fish receivers and fishers in-field.

Monitoring and enforcement

- monitoring of (voluntary) logbook return rates by TIB fishers, and
- focused monitoring and enforcement of CDR (and compulsory) logbook requirements.

Risk 2. Unlicensed fishing or fish receiving

Within the Torres Strait fisheries there is no limit on the number of TIB licences granted to (eligible) traditional inhabitants. However, unlicensed fishing by traditional inhabitants (who are eligible for a licence) increases the risk of undeclared catch and could therefore affect the sustainability of the fishery.

The granting of fish receiver licences is also unrestricted, however unlicensed fish receivers receiving fish presents a greater risk to the fisheries as the likelihood of undeclared catch is significantly increased.

Aim

To ensure all commercial fishers and fish receivers are licensed under the *Torres Strait Fisheries Act 1984*.

Objectives

- To ensure all commercial fishers and fish receivers are fully licensed.
- To ensure all commercial catch is landed through licensed fish receivers.

Methodology

Continuing with AFMA's education program, targeted education, monitoring and enforcement will form the basis for the compliance program and will consist of:

Education

- Development of educational material targeting Traditional fishers on the importance and benefits of a robust licensing system, including on-going dialogue with fish receivers and fishers in field, and
- Pre-season briefings and education sessions in key fisheries/sectors such as BDM fisheries.

Monitoring and enforcement

Focused enforcement programs including targeted in port inspections, at-sea, and aerial patrols.

Risk 3. Catching/Retaining no take/restricted take species

Across several the Torres Fisheries there are a number of no take or limited take species. These species may be taken for a number of reasons, including for personal/subsistence use or their direct commercial value. The take of these species, or exceeding bag limits, can place significant direct stress on the long-term sustainability of those stocks.

Aim

To prevent the take of no take species in the Torres Strait.

Objectives

To ensure all commercial fishers are aware of 'no-take' and 'restricted take' species in their fisheries.

Methodology

Consistent with the programs for treating risks 1 and 3, targeted education, monitoring and enforcement will form the basis for the treatment program and will consist of:

Education

Development of educational material targeting traditional fishers on the importance and benefits of no-take and restricted take limits, including on-going dialogue with fish receivers and fishers in field on the importance to species sustainability.

Pre-season briefings and education sessions in key fisheries/sectors such as BDM fisheries.

Monitoring and enforcement

Officers will conduct at sea patrols with the patrols to be conducted at commencement of season(s) and/or peak periods in the respective key fishing grounds. Patrols will focus on detecting/identifying take of restricted or no-take species

4.5.3 2022-23 NCEP shortfalls and remedial actions

AFMA did not complete its 2022-23 objective of undertaking baseline measurements within the Torres Strait Fishery(S).

Noting that technological and resources constraints limited the ability of the intelligence team to complete these baseline measurements, the CRMT will institute the following remedial actions.

- the Intelligence team will continue to work with AFMA's Data transformation project team to help improve AFMA's data extraction and analysis capabilities, and
- the Intelligence team will continue with completing baseline analysis works as outlined by the TSF CRMT team.

5

Maintenance Programs



5.1 Background

Since the establishment of the risk-based program in 2009, there has been several identified risks which were prioritised for treatment (in previous years) and addressed through specific risk treatment programs.

These risks are considered to have been addressed to a manageable level, but it was identified that the risks should be continuously monitored through established maintenance or 'Business as Usual' (BaU) programs.

The risks currently subject to [BaU](#) programs are:

- quota reconciliation
- closure monitoring and
- threatened, endangered and protected (TEP) Interactions,
- bycatch mishandling, and
- Vessel Monitoring System (VMS) and Electronic Monitoring (EM)

5.2 Business as usual programs

5.2.1 Quota reconciliation

The [Quota Administration Policy](#) sets out the AFMA principles for quota administration arrangements in Commonwealth fisheries that support AFMA in achieving its objectives under the *Fisheries Management Act 1991*.

Quota reconciliation is monitored by the National Compliance Operations team in accordance with the 28-day quota reconciliation policy and process. Under this policy, all Commonwealth fisheries using quota arrangements under the *Fisheries Management Act 1991* are subject to a 28-day reconciliation model which requires the concession holder(s) to balance within season over-catches within 28 days on a per species basis.

Enforcement principles and procedures will be applied if the concession holder(s) have exceeded the reconciliation period. AFMA aims to promote voluntary compliance and deter, detect, and enforce procedures for those who do not comply.

5.2.2 Closure monitoring

Compliance with closures, whether implemented via a direction or temporary order, is required under the conditions of fishing concessions. Fishing in a [closure](#) is a breach of permit condition(s) and an offence under s95(1) of the *Fisheries Management Act 1991* and regulation 86 of the Fisheries Management Regulations 2019.

AFMA implements spatial closures for a variety of purposes. These are in place to protect fragile ecosystems, a particular species, or to restrict fishing effort in a particular area of a fishery at identified times of the year.

AFMA will continue to educate fishers through the 'show cause' process. Concession holder(s) are requested to provide an explanation of their identified activity which reminds operators that AFMA may take enforcement action if the explanation provided is unsatisfactory.

5.2.3 Failure to report threatened, endangered and protected species interaction

Failing to report interactions with protected species (especially TEP species), or the retention of 'prohibited take' species, can have ramifications on the sustainability of the fishery in the long term. Non-reporting of interactions can result in under estimates of the mortality rates due to fishing, which can lead to an under estimate of the overall population of those species. Inaccurate information on catches can result in total allowable catches' (TAC) that are too optimistic.

In addition to EM reviews being conducted to detect incidences, AFMA will continue to work with industry stakeholders to identify impediments and issues relating to the identification and/or reporting of interactions to ensure industry have all the tools and resources necessary to accurately report all interactions.

5.2.4 Bycatch mishandling

AFMA collects visual information from fishing vessels via observers and EM. As a result of this monitoring, AFMA has become aware of instances of inappropriate handling of fish bycatch.

As part of its role in ensuring sustainable fisheries, AFMA and industry are taking measures to reduce the quantity of fish bycatch in Commonwealth fisheries. Inappropriate handling of fish bycatch can significantly reduce the chances of the fish's survival and may result in long term impact on the sustainability of bycatch species.

There is a risk across Commonwealth fisheries that operators may mishandle fish bycatch, detrimentally affecting their chance of survival and the long-term sustainability of fish stocks.

In response to the rising number of bycatch mishandling reports, AFMA commenced in 2016 a targeted education, monitoring, and enforcement program. These conditions were implemented in October 2016 and were accompanied by a set of [Bycatch Handling](#)

[Principals](#) and an [instructional video](#) produced and published on the AFMA website and social media.

AFMA will continue to educate fishers through the 'show cause' process. Concession holder(s) are requested to provide an explanation of their identified activity and in the process are reminded that AFMA may take enforcement action if the explanation provided is unsatisfactory.

5.2.5 Vessel Monitoring System and Electronic Monitoring

5.2.5.1 Vessel Monitoring System

In 2007, AFMA introduced the compulsory requirements for all Commonwealth endorsed fishing boats to be fitted with an operational AFMA approved [VMS](#) unit on an endorsed boat.

VMS is used continually for compliance and resource purposes, under Section 9D of the Fisheries Management Regulations 2019 and Section 42B of the *Fisheries Management Act 1991* apply to fishing concessions.

Any identified non-compliance issues will be assessed, and the operator contacted. All severe matters will be fully investigated by the operations team.

5.2.5.2 Electronic Monitoring

[Electronic Monitoring](#) (EM) systems are capable of monitoring and recording fishing activities. AFMA reviews the footage to verify the accuracy of logbook data. EM can also accurately monitor fishing operations with the ability to improve scientific data collection.

EM currently operates across the Eastern and Western Tuna and Billfish (ETBF), Small Pelagic Fishery (SPF) and Gillnet Hook and Trap (GHaT) fisheries with the data crucial to the management of these Commonwealth fisheries.

Any identified non-compliance issues will be assessed, and the operator contacted. All severe matters will be fully investigated by the operations team.

5.2.5.3 2022-23 NCEP shortfalls and remedial actions

AFMA did not complete its 2022-23 objective of keeping incidences of non-compliance with Electronic Monitoring requirements low in 2022-23. There were 34 incidences of suspected EM non-compliance in 2022-23, well above the threshold target of 20. However, the majority of these incidents saw operators educated on their obligations, with many being the result of systems failures rather than negligent behaviour on the part of the operators.

Noting the above issues, the AFMA compliance team will institute the following remedial actions;

- Work closely with AFMA's EM team to identify key failure points in EM systems,

- Undertake infield education with relevant operators to ensure their understanding of EM obligations.

6

Performance Assessment



6.1 Internal review and audit program

AFMA recognises that a critical part of the National Compliance and Enforcement Program is performance review, in accordance with the National Compliance and Enforcement Policy. The internal review and audit program aims to undertake systematic reviews of compliance and enforcement initiatives in the Program.

Each internal audit and review program will undertake the following phases:

Definition — define the function of the initiative and what it is aiming to achieve.

Assessment — assess the initiative through its intended aims and identify potential gaps.

Exploration — explore successes and challenges of the initiative (what worked and what did not work).

Refinement — explore the design of the initiative considering its intended aim and actual results and step out refinements or redesigns where appropriate.

Finalisation — formalise the preceding four steps by developing an internal review and audit report.

6.1.1 Aim

To systematically review initiatives undertaken within the National Compliance and Enforcement Program. These reviews will identify successes in these initiatives, but importantly look to define how these successes were achieved. These reviews will contribute to the understanding of what initiatives are successful and for what reason.

6.1.2 Objectives

To increase the effectiveness and success of initiatives within the National Compliance and Enforcement Program.

6.1.3 Review and audit program

AFMA proposes to undertake internal reviews and audits of two compliance initiatives per year. The threshold band will be one internal review or audit per year.

6.2 Program targets

Due to the nature of compliance programs, it is inherently difficult to assess their effectiveness in terms of outcomes. As a result, the effectiveness of the program (i.e., how well the program is meeting its aims and objectives) will be assessed using multiple outcome targets wherever possible, as well as input and output targets where a suitable 'outcome target' is not able to be identified. It is recognised and expected that not all performance targets or thresholds will be met due to the changing nature of risks and changes in fisheries practices.

In addition, and in recognition of the flexibility required to ensure effective targeting of prioritised risks (and the particular impact that required flexibility has on the resources available for other programs), an acceptable 'threshold band' has also been set for each target.

6.3 Education and communication performance targets

Forum	Description	Target	Threshold band
AFMA website	2022–23 Compliance and Enforcement Program published on website	July 2023	August 2023
	Identified Priority risks detailed on website	July 2023	August 2023
	Monthly 'Compliance Focus' feature articles published on website/social media	One per month	–
Media releases	Media releases issued for all 'Major Operations', 'Targeted Programs', 'Compliance Focus' items and court outcomes (convictions, other)	100%	80%
Engagement activities	Conduct one on one education with operators during routine inspections	75	50–75
	Fisheries officers conduct education sessions at pre-season briefings	100%	75–100%
Community fishing activities	Attend community fishing events and provide information of AFMA's Compliance Program	2	1–2
Targeted media/Social releases	Targeted/Social releases focussing on E-Monitoring non-compliance relating to seabird reporting and mitigation	2	1–2

6.4 General deterrence performance targets

6.4.1 Port attendance (Objective 1) performance targets

Target	Target	Threshold band
To undertake a minimum of three in port patrols (inspections) in 100% of the 'high risk' ports annually	100% (3 ports)	80–100% (1–3 ports)
To undertake a minimum of one in port patrol (inspection) in 100% of the 'moderate risk' ports annually	100% (10 ports)	80–100% (5–10 ports)
A minimum of 40 in port patrols conducted annually	>= 40 port visits	30–39 port visits
A minimum of 50 inspection days annually	>= 50 inspection days	40–49 inspection days
A minimum inspection rate of three per day	>= 3/day	2.5–3/day
100% of vessels and FRP operators, with adverse inspection outcomes, are re-inspected within three months of the original adverse inspection.	100%	> 80%

6.4.2 Boat inspections (Objective 2) performance targets

Target	Target	Threshold band
To inspect 100% of 'High Risk' boats (on one or more occasions) annually	100% (10 boats)	75–100% (5–10 boats)
To inspect a minimum of 25% of all (nominated) boats (on one or more occasions) annually	>= 25% (>=85 boats)	20–24% (68–84 boats)

Target	Target	Threshold band
A minimum of 150 boat inspections conducted annually	>= 150 boats	120–149 boats

6.4.3 Voluntary compliance targets (Objective 3) performance targets

Target	Target	Threshold band
No further action was required in 95% of inspections (boat, fish receiver premises and at-sea)	95%	85–95%

6.5 Targeted risks performance targets

6.5.1 Failure to report discards

Target	Descriptor	Target	Threshold band
Less than 20 detected incidents of non-reporting, or under reporting of quota species discarded	All quota species discarded to be reported as required, with no detected incidents of quota species discards unreported	< 20 years	<40 year
Less than 20 detected incidents of non-reporting of non-quota species discarded	All non-quota species discarded to be reported as required, with no detected incidents of non-quota species discards unreported	< 20 years	<40 year

6.5.2 Quota evasion performance targets

Target	Descriptor	Target	Threshold band
High risk operators identified on a regular and routine basis	Data matching and analysis will be used to identify those boats (operators) found to have the most indicators suggesting Quota Evasion may be taking place (i.e. they are the highest risk)	Identified monthly	Identified annually
Quota evasion detection analysis techniques regularly reviewed	A review of the data will be used to identify/detect quota evasion	Identified monthly	Identified annually
Routine covert surveillance program has been developed which targets quota evasion	Covert surveillance undertaken on landings by quota fishery operators	30	15

6.5.3 Torres Strait Fishery

Target	Target	Threshold band
To undertake a minimum of 30 boat inspections annually. Inspections to target logbook and CDR compliance and in-person education and dialogue on logbook and CDR's	=> 30 boats	> 22 boats
To undertake a minimum of 20 fish receiver inspections annually. Inspections to target CDR compliance and in-person education and dialogue on CDR's	=> 20 FRPs	> 15 FRPs

Target	Target	Threshold band
Increase rate of voluntary logbook submission in TIB fishers by 30%	=> 30% increase in submission rates	=> 15% increase in submission rates
A minimum of 12 at-sea patrols conducted annually	12 Patrols	8–12 Patrols
A minimum of 12 Port/Freight Hub audit visits annually	=> 12 audit visits	10–12 audit visits
Five targeted operations focusing on key risks	=> 5 targeted operations	3–4 targeted operations
Develop, expand, and deliver educational material on logbook and CDR requirements/benefits targeting fish receivers on the resource sustainability of fisheries and the importance of accurate data collection	September 2023	November 2023

6.6 Business as Usual (BaU) performance targets

6.6.1 28 day quota reconciliation

Target	Descriptor	Target	Threshold band
Less than two incidents per month of failing to reconcile quota	Less than two operators per month require investigation/action in respect to failing to meet 28-day quota reconciliation requirements	< 2 per month	< 10 months

6.6.2 VMS/EM BaU performance targets

Target	Descriptor	Target	Threshold band
98% of boats fully compliant with VMS requirements	98% of nominated boats are fitted with VMS units and the units are reporting at a rate greater than 12 polls per day, or have a valid Temporary Switch Off (TSO) approval	$\geq 98\%$	95–98%
Nil incidents of boats non-compliance with EM requirements	Nil incidents detected of non-compliance with EM requirements	< 5	< 20

6.6.3 Closure monitoring performance targets

Target	Descriptor	Target	Threshold band
Less than five (5) incidents of suspected closure breaches per year	Less than five (5) incidents per year of suspected breaches of AFMA fisheries closures	< 5 per year	< 10 per year

6.6.4 Bycatch mishandling

Target	Descriptor	Target	Threshold band
Incidents of bycatch mishandling reduced to zero	There are no detected incidents of bycatch mishandling requiring investigation	< 15 years	< 25 years

6.6.5 Failure to report TEP interaction/retention performance targets

Target	Descriptor	Target	Threshold band
Less than 10 detected incidents of non-reporting of TEP species interactions	All interactions with TEP species reported as required, with no incidents of unreported interactions requiring investigation	< 10 years	< 20 years
Less than 5 detected incidents of prohibited take species being retained	There are no detected incidents of prohibited (take) species (e.g., lobster, morwong etc.) requiring investigation	< 5 years	< 20 years
Less than 10 detected incidents of 'live and vigorous' (conservation dependent) prohibited take bycatch species retained	There are no detected incidents of live and vigorous (conservation dependent) species being retained (e.g., mako shark, school shark etc.) requiring investigation	< 10 years	< 20 years

6.7 Internal review and audit program

6.7.1 Internal review and audit program

Target	Descriptor	Target	Threshold band
Two internal reviews or audits of compliance initiatives within the National Compliance and Enforcement Program	Two internal reviews or audits of compliance initiatives within the National Compliance and Enforcement Program	2 per year	1 per year

7

Previous Performance



An assessment of previous years' performance has been undertaken against the 2023–25 NCEP targets. However, in some instances data may not have been collected, or is not able to be analysed, in such a way so as to provide historical assessment(s).

Target Met	Within Threshold	Target Not Met
------------	------------------	----------------

7.1 Communication/education

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
Compliance and Enforcement Program published on website	July	August	Target met	Within threshold	Within threshold	Published August 2021	Published September 2022
Priority Risks detailed on website	July	August	Target met	Within threshold	Within threshold	Published August 2021	Published September 2022
Monthly 'Compliance Focus' feature articles published on website – one per month	12/12	> 9/12	12/12	11/12	12/12	13	9/12
Media releases issued for all 'Major Operations', 'Targeted Programs' and court outcomes	100%	80%	100% (5/5)	100% (5/5)	100% (1/1)	100% (3/3)	100% (1/1)
Fisheries officers conduct education sessions at all pre-season briefings	100%	80%	100% (6/6)	100% (4/4)	100% (3/3)	100% (18/18)	100% (7/7)

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
Conduct one on one education with operators during routine inspections	75	50–75	356	289	295	201 (boat) 100 (FRP)	264 (boat) 62 (FRP)
Attend community fishing events and provide information of AFMA's Compliance Program	2	1–2	N/A	N/A	N/A	N/A	2

7.2 General deterrence performance targets

7.2.1 Port attendance (Objective 1)

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
To undertake a minimum of three in port patrols (inspections) in 100% of the 'high risk' ports annually	100% (3 ports)	33%–100% (1–3 ports)	100% (3)	100% (3)	100% (3)	100% (3)	67% (2)
To undertake a minimum of one in port patrol (inspection) in 100% of the 'moderate risk' ports annually	100% (10 ports)	80–100% (5–10 ports)	100% (10)	100% (10)	100% (10)	100% (10)	100% (10)
A minimum of 40 in port patrols conducted annually	>= 40 portvisits	30–39 port visits	231	143	182	130	148
A minimum of 50 inspection days annually	>= 50 inspectiondays	40–49 inspectiondays	154	123	148	106	112

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
A minimum inspection rate of three per day	>= 3/day	2.5–3/day	3.1	3.1	3.2	3.3	2.85
100% of vessels and FRP operators, with adverse inspection outcomes, are re-inspected within three months of the original adverse inspection	100%	>80%	N/A	N/A	42% (6/14)	100% (3/3)	50% (3/6)

7.2.2 Boat inspections (Objective 2)

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
To inspect 100% of 'High Risk' boats (on one or more occasions) annually	100% (10 Boats)	50 –100% (5–10 Boats)	80% (8)	100% (10)	100% (10)	80% (8)	100% (10)
To inspect a minimum of 25% of all (nominated) boats (on one or more occasions) annually	>= 25%	20–24%	58% (212/364)	54% (198/367)	61% (217/358)	55.8% (201/360)	71% (234/329)
A minimum of 150 boat inspections conducted annually	>= 150 Boats Inspected	120–149 Boats inspected	356	289 (Incl. 83 desktop)	344 (Incl. 49 desktop)	238 (Incl. 37 desktop)	264 (Incl. 7 Desktop)

7.2.3 Voluntary compliance targets (Objective 3)

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
No further action was required in 95% of inspections(boat, fish receiver premises and at-sea)	95%	85–95%	92% (461/502)	92% (348/377)	89% (431/484)	95.2% (314/330)	94.5% (302/326)

7.3 Targeted risks performance targets

7.3.1 Quota evasion performance targets

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
High risk operators identified on a regular and routine basis	Identified monthly	Identified annually	Annual	Annual	Annual	Annual	Annual
Quota evasion detection analysis techniques regularly reviewed	Identified monthly	Identified annually	Annual	Annual	Annual	Annual	Annual
Conduct Routine covert surveillance targeting quota evasion	=> 30 Landings surveyed	15–29 Landings surveyed	N/A	N/A	9	19	14

7.3.2 Failure to report discards

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
All incidents of quota species discarded reported as required, with no detected incidents of bycatch discards unreported	< 20/year	< 40/year	N/A	N/A	N/A	0	1
All incidents of non-quota species discarded reported as required, with no detected incidents of bycatch discards unreported	< 20/year	< 40/year	N/A	N/A	N/A	0	0

7.3.3 Torres Strait Fishery

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
To undertake a minimum of 30 boat inspections annually. Inspections to target logbook and CDR compliance and in-person education and dialogue on logbook and CDR's	100% (30 boats)	75–100% (20–25 boats)	48	39	26	37	45
To undertake a minimum of 20 fish receiver inspections annually. Inspections to target CDR compliance and in-person education and dialogue on CDR's	100% (20 FRPs)	75–100% (15–20 FRPs)	28	33	45	62	32
Increase rate of voluntary logbook submission in TIB fishers by 30%	=>30% increase in submission rates	=>15% increase in submission rates	N/A	N/A	N/A	N/A	3687 returned 2570 were voluntary 69.7%

A minimum of 12 at-sea patrols conducted annually	12 Patrols	8–12 Patrols	16	14	10	17	11
Port/Freight Hub audit visits annually	12 audit visits	10–12 audit visits	15	27	45	34	29
5 Targeted Operations	=>5 targeted operations	3–5 targeted operations	8	5	4	2	4
Develop, expand and deliver educational material on logbook and CDR requirements/benefits targeting fish receivers on the resource sustainability of fisheries and the importance of accurate data collection	May 2023	June 2023	N/A	N/A	N/A	N/A	0

7.4 Maintenance Programs – Business as Usual (BaU)

7.4.1 Failure to report interaction / retention of protected or prohibited species

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
All interactions with TEP species reported as required, with no detected incidents of interactions unreported requiring investigation	<10	<20 year	7	11	20	14	9
There are no detected incidents of prohibited (take) species (e.g. lobster, morwong etc.) requiring investigation	<5 year	<20 year	2	1	1	0	7
There are no detected incidents of live and vigorous (conservation dependent) species being retained (e.g. mako shark, school shark etc.) requiring investigation	<10 year	<20 year	8	11	5	14	2

7.4.2 Bycatch mishandling

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
Incidents of bycatch mishandling, requiring investigation, reduced to zero	<15	<25 year	16	15	10	6	6

7.4.3 Quota reconciliation

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
Less than two operators per month require investigation/action in respect to failing to meet 28 Day Quota reconciliation requirements	<2 month (<24)	<10 month (<120)	0.5 (6)	1.1 (13)	1.0 (12)	0.75(9)	0.33(4)

7.4.4 VMS/EM

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
98% of nominated boats are fitted with VMS units and the units are reporting at a rate greater than 12 Polls per Day, or have a valid Temporary Switch Off (TSO) approval	>=98%	95–98%	96.9	96.2	96.7	98.2%	98.0%
Nil incidents of boats non-compliance with EM requirements	<5	<20	3	8	14	21	34

7.4.5 Closure monitoring

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
Less than five (5) incidents per year of suspected breaches of AFMA managed Closures	<5 per year	<10 per year	1	2	1	5	4

7.4.6 Internal review and audit program

Descriptor	Target	Threshold band	Result 18–19	Result 19–20	Result 20–21	Result 21–22	Result 22–23
Two internal reviews or audits of compliance initiatives within the National Compliance and Enforcement Program	2 per year	1 per year	N/A	N/A	N/A	1	1