



TTMAC Out-of-Session, 19 June 2026

Meeting Record

Agenda item 1: Electronic Monitoring Program Changes

1.1 Background

1. The purpose of the out-of-session (OOS) item was for AFMA to inform TTMAC that AFMA is implementing major changes to the Electronic Monitoring (e-monitoring) Program and seek TTMAC's advice on the draft of e-monitoring Directions for the Eastern Tuna and Billfish Fishery (ETBF) and Western Tuna and Billfish Fishery (WTBF), developed to support the transition of the program.
2. AFMA has provided regular communications over the past few years about the need and decisions to transition to the proposed standards-based electronic monitoring (EM) program across all Commonwealth fisheries.
3. Changes to the EM program have been communicated progressively through letters and information packs to concession holders, correspondence with Tuna Australia, and discussions at broader industry meetings and media releases, since AFMA first received additional Government funding in the 2021-22 budget to support the changes.
4. AFMA endorsed the type-approval and standards-based approach on 9 September 2025, enabling approved EM system types to be used within the program and allowing industry to select and manage their preferred systems and providers.
5. In March 2026, AFMA issued correspondence to concession holders outlining the program changes, aligned to the standards-based approach, including industry-funded arrangements and approved EM systems meeting technical standards.
6. The proposed Directions represent the final output of that engagement process.

1.2 TTMAC OOS process

7. AFMA requested OOS advice from TTMAC on 7 May 2026. Comments were due by 22 May 2026. In total 7 members provided written comments, including from AFMA.
8. TTMAC industry members raised several key issues relating to: a) AFMA's broader policy decision to transition to a standards-based approach; and b) specifics of the proposed legislative instruments (e-monitoring Directions). In response to comments received, AFMA provided a detailed response addressing the feedback on 15 May 2026. AFMA's



response to the comments received are provided below. Subsequently, further comments were received from three members. These additional comments are also included below.

9. AFMA has also met with David Ellis, CEO of Tuna Australia, to discuss the proposed directions.
10. AFMA thanked TTMAC for their valuable feedback. AFMA will maintain ongoing communications and address any issues as these arise throughout the transitional period.

1.3 TTMAC's Out-of-Session Advice

11. As outlined in the OOS paper, TTMAC was asked to:
 - a) **NOTE** the purpose of this paper is to inform TTMAC of changes to the e-monitoring program and to seek advice on the associated draft e-monitoring Directions.
 - b) **NOTE** the forthcoming changes to the AFMA E-monitoring Program, which are proposed to take effect from 1 July 2026; and
 - c) **PROVIDE ADVICE** on the draft e-monitoring Directions presented for consultation, including whether the instruments are clear, workable and proportionate, and capable of practical implementation without unintended consequences.
 - d) **SUPPORT** the proposed Directions.
12. TTMAC noted broad support for the modernisation of the EM program and transition to the standards-based approach and increased flexibility for industry. Members acknowledged AFMA's work to improve efficiency and long-term program sustainability.
13. Relating to AFMA's broader policy decision to transition to a standards-based approach, TTMAC noted the following issues raised by industry members:
 - a) Cost and economic impacts of the transition on industry. Some industry members expressed concern about the transfer of financial responsibility to operators under the standards-based approach; seeking greater transparency regarding the total costs of the program, how those costs will be recovered, and the rationale for their allocation.
 - b) Privacy and security of data collected through e-monitoring systems. Some industry members highlighted the need for clear guidance on data ownership, storage periods, privacy protections, access arrangements and limitations on secondary uses of EM footage.
 - c) Arrangements to transition from legacy systems to type-approved systems under the standards-based approach. Some industry members sought further clarification on available replacement parts, ongoing software support, transition timeframes where legacy systems fail, and whether temporary exemptions may apply where approved replacement systems are unavailable.



- d) Cumulative regulatory impact of the changes alongside expected economic costs. One industry member queried whether there are any cumulative regulatory impacts alongside the transition to a standards-based approach in addition to economic costs.
- e) Ongoing consultation with industry. Some industry members recommended AFMA undertake continued engagement with industry to ensure the framework remains practical, proportionate and operationally workable throughout the transition period. Some industry members further highlighted the need for a formal post-implementation review process.

14. Regarding costs and economic impacts of the transition on industry, AFMA advised:

- a) Moving away from centrally funded systems allows operators greater choice of approved systems and service providers, with operators accountable for, and only paying for, their own technical services rather than contributing to broader cost recovery arrangements. This approach is intended to improve cost transparency and long-term program resilience while maintaining regulatory outcomes.
- b) Currently, EM costs are paid equally across the entire levy base including minor line and inactive SFR holders. Under the standards-based approach, longline vessel operators will be required to pay installation and maintenance costs directly, incentivising good operational practices.
- c) Arrangements under the AFMA Cost Recovery Impact Statement for shared levy costs with SBT remain unchanged.
- d) It is also worth noting that opening the market to other providers has already introduced competitive pressure on suppliers of EM systems, with reductions in hardware costs observed compared to the original prices under the current AFMA-managed contract. As the model shifts towards fishing operators or industry representatives negotiating directly with EM providers and managing their own commercial arrangements, it is not possible for AFMA to reliably estimate exact costs to service and maintain the system; however, AFMA can, and has, assessed the benefits of this approach, including increased choice, greater competition, improved scalability, and enhanced opportunities for innovation across EM systems and services.
- e) In addition, the responsibility [and costs] to maintain an operating EM system and to be compliant with regulation is the responsibility of vessel operators and remains.

15. With respect to port arrangements, data security, and privacy, AFMA noted that these requirements have always applied to EM operations and are not changed by the proposed new Directions. The transition to a standards-based framework does not alter data ownership arrangements or the security and privacy controls governing EM data. The same legislative, policy, and contractual protections will continue to apply, including controls on access, storage, use, and disclosure of EM data.



16. AFMA also noted that operators were first advised in June 2024 of the end-of-life status of legacy EM systems and has also been communicated by both AAP and AFMA a number of times since then. Existing Archipelago systems may continue to be used until they are no longer operational. AFMA will allow continued use of these systems while they remain functional, recognising practical constraints, including the availability of replacement parts and approved systems. The alternative, approved systems are already available.
17. AFMA acknowledges the concern regarding the cumulative regulatory burden on operators and recognises that EM requirements operate within a broader compliance and cost environment. Existing core requirements, such as the installation and operation of EM systems, fault reporting, and data submission, are longstanding elements of the EM program and remain unchanged. Instead, previous prescriptive requirements in the Direction have been removed and redrafted to improve clarity and assist concession holders to better understand and comply with their obligations. The only substantive changes relate to new configuration and report submission requirements. These changes are intended to support a more flexible, standards-based EM program, providing greater choice in how requirements are met while improving overall regulatory efficiency.
18. In line with AFMA's approach during the past four years while the transformation of the EM program has been developed, AFMA remains committed to ongoing consultation with industry throughout implementation. The intent of the Directions is to provide a clearer and more consistent regulatory framework while preserving the flexibility required to manage real world operational challenges. Engagement with industry representatives will continue to be an important part of implementation and refinement of the program.
19. Relating to specifics of the proposed legislative instruments (e-monitoring Directions), TTMAC members noted the following issues raised by industry members:
 - a. Whether it is reasonable, from an operational practicality point of view, to require e-monitoring systems to be operational at all times, noting that systems can fail through no fault of the fisher whilst at sea and the time taken to get services and repairs completed if in remote areas.
 - b. There is a lack of clear guidance on determining the nature of a system fault (minor or major).
 - c. There is a lack of clear guidance on how operators should respond once aware of a system fault.
 - d. There is a lack of clear guidance on how a case-by-case compliance approach is applied.
20. TTMAC also noted dissenting views on how the direction defines the term "catch" and the explicit clarity being requested by industry on compliance responses to non-operational EM systems and faults/situations beyond an operator's control.



21. In relation to the definition of “operational,” the intent is to clearly establish that any system component that is damaged, displaced, disconnected, or otherwise not functioning as intended must be reported to AFMA. This allows potential issues to be assessed and managed appropriately. Minor or temporary faults that do not materially affect data collection are considered in context, with AFMA focusing on overall monitoring capability and risk rather than technical perfection. However, this is an assessment and decision that must be made by AFMA and not individual operators or other service providers.
22. AFMA noted that some of the language used in the Directions is necessarily principles based. This reflects the reality that EM issues arise in a wide range of operational contexts and cannot be exhaustively prescribed in advance. Each situation will continue to be assessed individually, based on risk and practicality. This approach is intended to provide flexibility rather than create uncertainty or unintended compliance outcomes.
23. AFMA noted that vessels in both the Eastern Tuna and Billfish Fishery (ETBF) and Western Tuna and Billfish Fishery (WTBF) have been required to have EM systems installed and operational at all times when not in port since 2015. This requirement is longstanding and is not new or expanded under the proposed Directions. Vessel operators are required to undertake an EM system function test prior to departing port. Where issues occur with EM system operation, operators are required to contact AFMA as soon as they become aware of the issue.
24. In their response AFMA also acknowledged that, where issues arise while fishing, communications at sea can be limited due to weather, vessel location, or system availability, and these practical constraints are considered when assessing notification timeframes and responses. Early contact enables discussion with the relevant fishery manager to determine appropriate options on a case-by-case basis, informed by risk, operational circumstances, and the nature of the fault. These requirements and protocols are an existing feature of the EM program and remain unchanged under the proposed Direction. AFMA confirmed that compliance decisions will continue to be made on a case-by-case basis informed by risk, operational circumstances/constraints and the nature of the fault.
25. With respect to data submission requirements, trip length does not affect compliance provided that data drives are submitted at the first landing of the month. Requiring submission at the first landing of the month improves AFMA’s ability to reliably track data drives, reduces the risk of data loss, and supports timely review of EM information for regulatory and management purposes. Once the drives are submitted and a post receipt is provided, the operator has met their obligation, providing certainty for operators regardless of trip duration. This approach has been consistently applied, communicated to industry for a considerable period of time, is well understood by vessels operating in the WTBF and ETBF and remains unchanged in the proposed Direction.



26. TTMAC noted that of the members who provided advice, four including the AFMA member, supported the proposed new direction as presented, whilst three industry members raised concerns with some aspects of the proposed new direction. TTMAC noted that some of the industry concerns related to existing obligations under the current direction. The TTMAC Chairperson is also satisfied that the draft direction is fit for purpose after considering the previous work to develop and communicate the EM changes, TTMAC members' feedback on the draft EM direction and AFMA's responses to the matters raised by TTMAC industry members. TTMAC acknowledged AFMA advice that it will continue to engage with industry during implementation of the standards-based approach.