



SOUTH AUSTRALIAN SARDINE INDUSTRY ASSOCIATION

Submission to the Chair of the DCV Safety Review Panel regarding the

INDEPENDENT REVIEW OF DOMESTIC COMMERCIAL VESSEL SAFETY LEGISLATION

The South Australian Industry Association (SASIA) is the industry organisation representing 100% (14 licence holders) of the South Australian Sardine Fishing Industry. The South Australian Sardine Fishery's economic contribution to Gross Regional Product (Eyre Peninsula) is AU\$32M pa and employees 185 full time positions in the regional area of Port Lincoln, SA.

SASIA generally supports the recommendations and findings of the Independent Review of DCV Safety Legislation (Draft Phase 1 Report), including the key finding:

While there is room for improvement, there is evidence to suggest the National Law framework has improved safety outcomes. However, the legal framework has introduced unnecessary complexity and regulatory burden and is not responsive to innovation and change.

SASIA has concerns with a specific finding and associated recommendations in relation to grandfathering (Finding 3 and Recommendation 2). We disagree that progressive withdrawal of existing grandfathering arrangements will substantially improve safety outcomes for the fishing industry.

Removal of grandfathering arrangements in relation to vessels and crew qualifications will place a significant and unjustified cost and time burden on fishing and seafood sector, with no evidence of improved safety. In some circumstances, dishonoring grandfathered agreements may cause an increase of psychosocial hazards in the workplace and lead to the exit of competent crew from the industry, which may also decrease workplace safety due to a fall in the collective experience of fleet personnel.

Original industry agreement to transition to a national system was on the basis that grandfathering arrangements would remain in place under conditional perpetuity. Lack of data between grandfathered and non-grandfathered vessels adds merit to the argument that little to no improvement in safety will occur should these recommendations be implemented, particularly from the risk perspective of the SA sardine fleet.

Should the Australian Government establish an industry assistance package to implement transition arrangements away from grandfathering, significant consideration of the timeframes and the cost/benefit versus safety risk would need to occur during Phase 2 of the Review.

SASIA advocates that the cost of revoking grandfathering for vessel and crew competency outweighs the safety benefit and that any phasing out schemes are not adopted by AMSA.

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