

To whom it may concern.

I believe that the Grandfathering of some fleets needs to be honored and kept into the future. To tar every single vessel and or fleets with the same brush would be a monumental mistake. Proven safe practices should be recognized when assessing any changes going forward. E.G., in the Spencer Gulf Prawn Fishery, our Management Plan ensures that the fleet do not fish in bad weather, (i.e. >25 knots). The fact that we also fish in a relatively “land-locked” inverse estuary is somewhat safer than fishing 200 miles of the nearest coast. By having a “Bad Weather Rule” our insurance premiums are kept low and very competitive. Another example of being unique and therefore regulated differently, we have recently negotiated longer intervals for our stainless steel, oil cooled, shaft inspections. This is due to the fact that our fleet only spend on average 50 nights a year, as opposed to other fisheries that clock up many more thousands of hours annually.

So, in summary, because there are so many different fisheries and vessels out there, there needs to be recognition of this to maintain harmony. A one rule fits all regime would be a lot easier to manage and administer, but that is not a good way to grow good governance. Good operators need to be rewarded, with tailored requirements, that then sets the tone for the rest.

Sincerely,

Greg Palmer

Spencer Gulf Prawn Fishery