



## Submission form

### Proposed Australian Biofouling Management Requirements Consultation Regulation Impact Statement

Please use this form to make your submission and then send it to:

**Email (preferred):** [IMS-Program@daff.gov.au](mailto:IMS-Program@daff.gov.au)

**or post:** Invasive Marine Species Program  
GPO Box 858  
CANBERRA ACT 2601

**Closing date:** 29 February 2012

**Contact Name:**

**Position:**

**Organisation:**

**Address:**

**Suburb/City:**

**State:**

**Postcode:**

**Phone:**

**Mobile:**

**Email:**

**Is ALL of your submission confidential?**

(the whole submission is provided 'IN CONFIDENCE')

Yes

No

**Is PART of your submission confidential?**

(relevant part provided under separate cover and clearly marked)

Yes

No

**Do you agree to your submission being made publicly available?**

Yes

No

**If no, do you agree to your name and state/territory being listed?**

Yes

No

*Please note:*

- For submissions made by individuals, no address details, except your name and state or territory, will be published.
- At the discretion of the Department of Agriculture, Fisheries and Forestry, submissions will be placed on the DAFF website at the end of the submission period unless marked confidential.
- Confidential material should be provided under a separate cover and clearly marked 'IN CONFIDENCE'.

- Copyright in submissions resides with the author(s), not with DAFF.
- Submissions cannot be accepted unless accompanied by this cover sheet.

## **Your submission**

Please provide any comments you have on any of the questions posed in the Regulation Impact Statement. If you wish to comment on other aspects of the Regulation Impact Statement, please see question 9.

**Q1. Do the proposed operating time restrictions on vessels achieve an appropriate balance between minimising biological risk (which increases with time) and minimising the impact on vessel operators (who may need more time)? If not, why and what would be a better balance?**

[insert your response here]

**Q2. How might vessel operators' behaviour change in response to the proposed regulations?**

[insert your response here]

**Q3. What specific types of flow-on costs and benefits to the Australian economy of the proposed regulations might be significant?**

[insert your response here]

**Q4. The estimates of costs are based on average vessel numbers from 2002-2009. Is there any activity or trends that suggest any significant change in vessel movement or increased numbers of arrivals?**

[insert your response here]

**Q5. Are the cost assumptions consistent with industry experience? (see appendix D for all cost assumptions). Are there better estimates of costs available?**

[insert your response here]

**Q6. Are the other assumptions used to estimate costs and benefits reasonable based on industry experience? If not, how could they be improved?**

[insert your response here]

**Q7. The methodology for estimating the economic value at risk relies on a series of assumptions about the value of commercial fishing and the Great Barrier Reef. Are there more plausible assumptions or approaches that could be used?**

[insert your response here]

**Q8. What other evidence is there of the potential impacts of non indigenous marine species becoming established in Australia?**

[insert your response here]

**Q9. What is industry's view of the likely effectiveness of a voluntary approach to reducing the risks associated with biofouling compared to a regulatory approach?**

[insert your response here]

**Q10. Do you have any other comments on the Regulation Impact Statement?**

[insert your response here]

## **Preparing a submission**

Please provide your comments on the *Consultation Regulation Impact Statement* using this form. The department is particularly keen for your input on the questions posed in the RIS (questions 1-8). However you are welcome to provide your views on any aspect of the RIS (question 9).

Please note that you are not required to answer all questions, only those that you wish to respond to. There is no limit on the length of your submission.

### **Email lodgement is preferred**

All submissions must use the submission form.

If possible, submissions should be lodged by email as a Word or RTF document. If providing hard copies, they should be typed or clearly written on single-sided A4 paper.

### **Confidentiality**

If you wish your whole submission to be kept in confidence, this should be clearly indicated on the cover sheet and at the front of the submission. Confidential material should clearly marked 'IN CONFIDENCE'.

If you want only part of your submission to be confidential, please mark it clearly and put that part on a separate page(s). The secretariat will endeavour to keep any such submissions confidential but cannot provide an absolute guarantee of confidentiality because certain confidential information may be required to be disclosed by law or to the Parliament.

Unless you request that your submission be treated confidentially, it may be made publicly available on the Department of Agriculture, Fisheries and Forestry website. In addition, unless you request otherwise, your name and state or territory will be listed on the website.

**Lodging submissions**

Submissions are required to be lodged with the Invasive Marine Species Program by **Tuesday 29 February 2012**. The email and postal addresses for submissions are provided at the top of the cover sheet.

**Further information**

If you require further information on making a submission contact the Invasive Marine Species Program by email at [IMS-Program@daff.gov.au](mailto:IMS-Program@daff.gov.au).