



Proposal to vary the Submarine Cable (Southern Sydney Protection Zone) Declaration 2007

Australian Communications and Media Authority

9 June 2025

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The Australian Communications Consumer Action Network (**ACCAN**) thanks the Australian Communications and Media Authority (**ACMA**) for the opportunity to contribute to its proposal to vary the Submarine Cable (Southern Sydney Protection Zone) Declaration 2007 (**the Protection Zone Declaration**).

ACCAN is the peak national consumer organisation advocating for trusted, accessible, inclusive, affordable and available communications and digital services.

ACCAN supports the ACMA's proposal to amend the Protection Zone Declaration in response to Perch Infrastructure Pty Ltd's request to extend the southern-most boundary of the Southern Sydney Protection Zone to include the proposed Tabua submarine cable (**the cable**).¹ We support the proposed expansion of the protection zone by up to 4.1 km to the south to accommodate the cable's installation and agree that all existing prohibitions and restrictions under the current Protection Zone Declaration should apply to the expanded area.²

ACCAN agrees with the ACMA's assessment that the cable constitutes a project of national importance.³ The cable's ability to connect Australia with critical Indo-Pacific partners will play a key role in reinforcing our communications infrastructure and advancing national digital capabilities.⁴

We thank the ACMA for the opportunity to comment on the proposal to vary the Protection Zone Declaration. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Dr Amelia Radke, Principal Policy Officer, at amelia.radke@accan.org.au.

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples.

¹ ACMA, *Proposal to vary the Submarine Cable (Southern Sydney Protection Zone) Declaration 2007* (Consultation paper, May 2025) 1.

² Ibid.

³ Ibid 9.

⁴ Ibid.



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