



Dr Marjorie O'Neill MP

MEMBER FOR COOGEE

13/06/2025

From: Sydney Dive Wreck Consultative Committee (SDWOC)

To: Australian Communications and Media Authority (ACMA)

**Proposal to Vary the Submarine Cable (Southern Sydney Protection Zone)
Declaration 2007 – Consultation Paper Submission**

Executive Summary

The Sydney Dive Wreck Organising Committee (SDWOC) respectfully submits this response to the ACMA's consultation paper regarding the proposed variation of the *Submarine Cable (Southern Sydney Protection Zone) Declaration 2007*.

SDWOC expresses concern that the proposed expansion or redrawing of the protection zone may directly conflict with longstanding and community-supported plans to create an artificial dive reef off the Sydney coast.

We seek to ensure that ACMA's consultation process includes an assessment of whether a dive wreck—especially one established *prior* to cable installation—would indeed be incompatible with the objectives of the protection zone. We respectfully request a meeting or forum to present our project in detail.

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Background: The Sydney Dive Wreck Project

The SDWOC, chaired by the Member for Coogee Dr Marjorie O'Neill and supported by over 14,200 petitioners, tabled in the NSW Parliament in October 2024 has developed a comprehensive proposal for a purpose-sunk artificial reef and dive wreck off the coast of Sydney. The project has cross-party parliamentary support and is designed to enhance marine biodiversity, provide recreational and tourism opportunities, and serve as an environmental and educational resource.

Our business plan and environmental impact considerations (available at https://www.gordonsbayscubadiving.com/reef_businessplan-May2023.pdf) demonstrate that the artificial reef would be ecologically sustainable, economically beneficial, and navigationally safe.

Key Concerns

1. Potential Conflict of Use:

The proposed revised submarine cable protection zone may encompass or abut the intended site for the artificial reef. If so, it risks pre-emptively excluding a project that has wide community and political support.

2. Timing of Installations:

If the artificial reef is established prior to cable deployment, and appropriate spatial offsets are implemented, we question whether there is any technical or regulatory basis for deeming the projects incompatible.

3. Lack of Stakeholder Engagement:

We are concerned that community and recreational stakeholders have not been adequately consulted, despite the scale and momentum of the dive wreck project.

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Our Position

SDWOC does not oppose the importance of submarine cable infrastructure, but we urge the ACMA to ensure the following:

- That coexistence of protected submarine cables and artificial reef installations is formally explored.
- That consideration be given to existing proposals and approvals for marine infrastructure (such as dive wrecks) in the proposed area.
- That the protection zone boundaries incorporate flexibility or exclusions for established, non-threatening structures such as dive reefs.

Request for Action

1. Consultation Meeting:

We request the opportunity to meet with relevant ACMA, industry, and Crown Lands representatives to present the dive wreck proposal in detail.

2. Assessment of Compatibility:

We request a technical assessment of whether a pre-installed artificial reef would pose any risk to future cable deployment, assuming all known engineering safeguards are followed.

3. Interim Hold on Finalisation:

We request that no final variation to the declaration be made until compatibility with the dive reef proposal is clarified.

Contact:

Sydney Dive Wreck Consultative Committee

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Chair: Dr Marjorie O'Neill, MP for Coogee

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Yours Sincerely,

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