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Nairobi Wreck Removal Convention
Department of Infrastructure, Transport, Regional Development and Communications
By Email: wreckconvention@infrastructure.gov.au

To whom it may concern,

Discussion Paper: Australia's accession to the Nairobi International Convention on the Removal of Wrecks 2007

Thank you for the opportunity to comment on the Australian Government's *Discussion Paper: Australia's accession to the Nairobi International Convention on the Removal of Wrecks 2007* (Wreck Convention).

The Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils that advances sustainable management of Sydney's urban coastal and estuarine environment. We currently comprise nine member Councils who represent approximately 1.3 million Sydneysiders. Our goals include waterways and foreshores being protected and healthier, and marine biodiversity protected in the bioregion.

Recent events involving wrecks at sea such as the APL England container loss which occurred on 24 May 2020, when 50 containers fell overboard southeast of Sydney highlight the importance of effective responses to clean-up operations. This resulted in marine debris being deposited in the surf zone and on beaches and clean-up operations along the NSW coast. The debris creates a physical hazard for water users and marine organisms as well as potential for impacts on water quality.

Our member councils have a duty of care to ensure that beaches and surrounding environments are free of hazardous debris and impacts to public and ecosystem health are appropriately managed. This can mean that Councils may bear the costs of clean-up activities from wrecks and container loss. A recent example is where Malabar Beach was closed for the morning of 27 May 2020, in order to perform a thorough clean-up due to the contents of a shipping container/s washing up all over the beach, presumably associated with the APL England container loss. The costs of the clean-up were unreasonably borne by Randwick Council.

The SCCG has reviewed the Wreck Convention Discussion Paper and the options for consideration. The option of ratifying the Wreck Removal Convention and implementing its framework in the territorial sea and the Exclusive Economic Zone, as well as being expanded to include Domestic Commercial Vessels and recreational vessels is considered the best option. This option appears to be the most comprehensive for types of vessels, noting it would also ensure Australian law regarding wrecks and cost recovery is aligned with international standards currently in force for the majority of the global shipping fleet.



Sutherland Shire
COUNCIL

INNER WEST COUNCIL



WAVERLEY
COUNCIL



Bayside Council

northern
beaches
council



WILLOUGHBY
CITY COUNCIL
City of Diversity



Randwick City Council
a sense of community



I look forward to the next steps after comments are considered on the Wreck Convention Discussion Paper and opportunities for further engagement of our member councils to ensure their interests are fully addressed in the Wreck Convention. The SCCG is an effective and efficient conduit for engaging with coastal and estuarine Councils in the Sydney region and can facilitate workshops with our members.

Yours sincerely,



Sarah Joyce
Executive Officer

