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Reference: 035-19

18 October 2019

Review of the NSW Marine Pollution Act 2012
Freight Policy and Government Regulations
Customer Strategy and technology
Transport for NSW
PO Box K659
Haymarket NSW 1240

Re: Review of proposed amendments to *NSW Marine Pollution Act 2012*

To whom it may concern,

The SCCG is a regional organisation of Councils (ROC) that advances sustainable management of Sydney's urban coastal and estuarine environment. We currently comprise nine member Councils who represent 1.3 million Sydneysiders. I am writing to you to express primarily our support for potential amendments to the *Marine Pollution Act 2012*.

We would like to express our support for the following proposed amendments:

1. Broadening the definition of 'State waters' under Part 1 - this would provide greater coverage for State authority and therefore strengthen the protection of the marine environment
2. Introduction of an offence for defective sewage pollution prevention equipment - SCCG acknowledges the detrimental effect wastewater has to the marine environment
3. Powers to initiate proceedings against an insurer - SCCG recognises the limitations of proceeding actions against the private owner of a vessel found to have committed an offence under the oil pollution provisions. For this reason, the powers introduced by Part 13 are welcomed
4. Allow State to issue a notice to the owner of a derelict or out-of-commission vessels requiring the removal of marine pollutants from the vessel under Part 15
5. Expansion of legislative powers under Part 18 - allowing the State to obtain security for payment for incurred costs for clean-up of marine pollution incidents is highly supported.

SCCG supports these proposed amendments as any actions taken towards the prevention and removal of marine pollutants will have a positive impact on the marine environment.



Sutherland Shire
COUNCIL

INNER WEST COUNCIL



WAVERLEY
COUNCIL



Bayside Council



WILLOUGHBY
CITY COUNCIL
City of Diversity



Randwick City Council
a sense of community



However, SCCG holds concerns over the potential oversight which may occur by the proposal to remove State certification requirements of large ships on international voyages. Although this amendment is made for the purposes of streamlining and aligning with Commonwealth provisions, SCCG believes that powers must be vested in the State to regulate levels of oil, sewage and chemicals in order to ensure that these levels remain at a reasonable level and within the limits of the local marine environment.

Finally, SCCG recommends a mandatory inclusion of garbage management plans for vessels with a GT of 100 or less and garbage disposal placards for vessels 12 metres or less to ensure all potential marine pollutants are properly disposed.

If you have any queries, please contact me by email at executiveofficer@sydneycoastalcouncils.com.au or by phone (02 99761502).

Yours sincerely,



Sarah Joyce
Executive Officer

