

Administrative Appeals Tribunal decision allows scuttling of the Ex-HMAS Adelaide to proceed

Background

In 2000 the Central Coast Artificial Reef Project (CCARP) began lobbying the Australian Government to secure a navy vessel to be sunk as an artificial reef and dive site on the NSW Central Coast. They achieved success when the Australian Government announced in 2007 that the Ex-HMAS Adelaide would be gifted to the NSW Government for this purpose. The project would benefit the Central Coast economy through increased tourism, while also providing important scientific research and educational opportunities.

The ship was handed over to the NSW Government in June 2009, and the Land and Property Management Authority (LPMA) engaged an experienced contractor to carry out a comprehensive cleaning process to ensure the ship met the stringent environmental and health requirements set by the Department of Environment Water Heritage and the Arts (DEWHA). After the clean-up process was completed, DEWHA issued an Artificial Reef Permit under the *Environment Protection (Sea Dumping) Act 1981* and the ship was scheduled to be scuttled near Avoca Beach on 27 March 2010.

The scuttling was halted after the No Ship Action Group (NSAG) applied to the Tribunal to review the decision by DEWHA to issue the Artificial Reef Permit. The Tribunal's role was to consider whether DEWHA's decision to grant the permit was the 'correct and preferable' decision.

The Administrative Appeals Tribunal handed down its decision on 15 September 2010, allowing the scuttling of Ex-Adelaide as an artificial reef to proceed with some extra conditions relating to the preparation of the ship and environmental monitoring.

What were the key issues before the Tribunal?

The NSAG originally had a long list of environmental concerns, principally claiming that the marine environment would be polluted by the scuttling of Ex-Adelaide due to leaching into the marine environment of polychlorinated biphenyls (PCBs) and a range of heavy metals.

On the second day of the hearing, the NSAG dropped their claims regarding PCBs and most of the heavy metals. The case proceeded principally upon their concerns relating to potential harmful effects from lead-based paint and the copper-based anti-fouling system.

The NSAG also argued that the proposal was contrary to the international convention known as the London Protocol¹. The NSAG wanted the ship to be recycled for scrap metal.

Evidence before the Tribunal

The Tribunal heard evidence from a number of experts on these issues, including DEWHA's consultant who has assessed many vessels sunk as artificial reefs, as well as independent Australian and American experts in environmental monitoring and risk assessment. Evidence was also presented on environmental monitoring results from case studies of other vessels placed as artificial reefs in Australian and American waters for similar purposes to the Ex-Adelaide Project.

¹ also called the *1996 Protocol to the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, 1972*

The Ex-Adelaide had been prepared to meet DEWHA's standards which were defined and specified during the months of preparing the ship for scuttling. DEWHA had conducted a series of inspections to confirm that its detailed requirements were achieved.

In summary, the NSW Government presented expert evidence that:

- the risk of leaching of PCBs was negligible and the risk of contaminating the marine environment was negligible;
- the likelihood of harmful effects on the marine environment from copper leaching was low;
- due to the type of lead that was present - lead tetroxide, which is a particularly inert and insoluble type of lead - the likelihood of harmful effects on the marine environment was low; and
- the proposed scuttling was consistent with the London Protocol as it entailed the deliberate placement of the ship for the purpose of creating an artificial reef that will attract marine life, and hence was not 'dumping'.

The Tribunal's findings

Following is a summary of the key findings of the Tribunal, together with some background on the ship preparation process. The full decision is available from the Tribunal's website www.aat.gov.au².

1. PCBs

Known potential sources of PCBs were identified and removed from the ship during the original clean-up process by the Department of Defence (prior to handing over the ship to the NSW Government) and LPMA's contractor. These included a limited number of components in electrical cabinets and transformers. In addition, over 73 tonnes of copper cabling were removed from the ship and recycled.

A comprehensive testing program was undertaken to analyse 83 representative samples using NATA³ accredited laboratories. The outcomes of these tests were that:

- Only three samples had any measurable amount of PCB, and all were less than the nominated threshold level for classification as a scheduled PCB material of 50mg/kg of Total PCBs.
- Even though the results were well below the nominated threshold level, the materials at these locations were removed from the ship.
- The worst-case mass of PCB remaining on the ship was estimated at less than 100 grams (less than the amount contained in the capacitors of four older-style fluorescent lights). The NSAG's expert calculated an even lower estimate of less than 60 grams.
- The amount of PCB remaining on the ship now would be negligible. Reports by environmental risk experts concluded that the risks to the environment are negligible.

Although the NSAG withdrew its claims regarding PCBs, the Tribunal considered the evidence on PCBs and concluded:

'We note that cabling and related equipment likely to contain PCBs has largely been removed from the ship... Although remaining quantities of PCBs are very likely below the level of significant concern, it is ...our view... that the process of removal should be completed before the ship is scuttled.' [53]⁴

² No Ship Action Group Inc. and Minister for Sustainability, Environment, Water, Population and Communities, and State of New South Wales (Joined Party); 15/09/2010; Justice Downes, President, Mr P Wulf, Member, Mr M Hyman, Member

³ National Association of Testing Authorities

⁴ References in square brackets indicate the source by the paragraph number in the Tribunal's report.

2. Lead

The original clean-up process by LPMA's contractor included removing loose or flaking paint in accordance with DEWHA's requirements.

The NSAG temporarily dropped the lead issue but raised it again during the course of the hearings. A total of 110 paint locations were then tested from representative locations across the ship, confirming the presence of lead primer at some locations on the steel lower decks of the ship. The paint at other locations tested had yellow primer, red oxide, white topcoat and grey topcoat which did not contain lead. The use of lead-based primer is only relevant to the internal steel hull and lower decks of the ship where it was used for corrosion protection, as the superstructure is constructed of aluminium.

The United States and Canadian guidelines for creation of artificial reefs do not require the removal of lead paint prior to scuttling. These guidelines are used by the Australian authorities in their assessment process for artificial reef permits. The only requirement is to remove 'loose or flaking paint', defined as paint that can be removed with a wire brush using reasonable force.

The likely mass of lead remaining on the ship was estimated at approximately 750 kg, with a worst-case estimate of 2.3 tonnes, compared to the original estimate by the NSAG's expert of 28 tonnes. Reports by environmental risk experts concluded that the risks to the environment and human health from the presence of lead-based primer are negligible because:

- the lead primer used is in the form of lead tetroxide, which is very insoluble so there would be minimal leaching; and
- the lead is in a form that has low bioavailability, little potential for bioaccumulation, and does not biomagnify.

The Tribunal concluded that a critical issue in the assessment of lead is its bioavailability, and that *'all the information available to us points to a conclusion that there is no risk of harm to human health or the environment'*. [72]

The Tribunal concluded that there was no risk from lead and no locations with loose or flaking paint were identified. However, the Tribunal took a precautionary approach and added a new condition to the Permit requiring the canvas covering and insulation to be removed to enable the paint surfaces underneath to be examined and for any loose or flaking lead paint found underneath to be removed.

3. Copper

Reports by environmental experts concluded that the risks to the environment from the presence of copper in the anti-fouling paint are not a significant concern because:

- the coating is designed to leach as part of its protective process, and the leaching rate declines after the first six months;
- because of this declining rate, the Navy's standard practice is to apply a new coating every five years; and
- the last coating was applied to the Adelaide seven years ago, so it is near the end of its useful life, thus reducing the amount of copper remaining that could be released into the marine environment.

The Tribunal noted that copper is a known biocide in the marine environment, which is why it is used in anti-fouling paints. The Tribunal concluded that the scuttling of the ship will lead to a limited increase in the concentration of copper in the vicinity of the wreck and that copper will be dispersed in the active ocean environment around the wreck.

The Tribunal finding was *'that the antifouling is seven years old, that the majority of the anti-fouling coating is already depleted and that the risks to the environment from the remaining anti-fouling coating into the active environment surrounding the sunken ship are not significant.'* [89]

4. The London Protocol

In preparing the ship for placement as a reef, a significant portion of the material removed from the ship has already been recycled. This includes over 500 tonnes of copper, aluminium, stainless steel, and lead ballast.

The Tribunal concluded that, in the context of recycling, the scuttling of the Adelaide as an artificial reef is a reuse of the ship. The Tribunal also concluded that the purpose of the scuttling – to create an artificial reef – is recognised by the *Environment Protection (Sea Dumping) Act* as a proper purpose.

The Tribunal's conclusions

The Tribunal concluded that:

- *'There are benefits to the environment from the resulting marine habitats generated, as well as more general benefits to the community. The level of pollutants now aboard the ship is low, and those that remain are either in very low quantities or inert and unlikely to cause any environmental problem...'* [97];
- given the low levels of environmental risk, the re-use of Ex-Adelaide through scuttling as a dive wreck is consistent with the aims of the London Protocol; and
- the preferable decision was to grant a permit to allow the placement of Ex-Adelaide as an artificial reef, agreeing with the original conditions imposed by DEWHA plus some additional conditions.

The Tribunal's additional conditions related to:

- completion of the process of removing any remaining wiring which might be associated with PCBs;
- the removal of canvas and insulation from the ship;
- removal of any loose or flaking lead-based paint that might be found behind the insulation; and
- an extra two sites to be tested for lead in the existing environmental monitoring program set out in the Long Term Monitoring and Management Plan.

What are the next steps in the project to scuttle the Ex-Adelaide?

LPMA is assessing the additional work required by these conditions in consultation with the contractor engaged to prepare and scuttle the ship. Once this assessment is completed, a timetable for completing this exciting project will be established.

This will allow the Central Coast to reap the recreational, tourism and economic benefits of this project as well as the educational and scientific research opportunities.

EXTRACT FROM EX-HMAS ADELAIDE ARTIFICIAL REEF PROJECT COMMUNICATIONS SUMMARY

Prepared: February 2010

1. Project Milestones

Project milestones are noted as follows.

Date	Event
<i>Previous Milestones</i>	
1. February 2008	Signing of the Project Deed of Gift
2. May 2008	Selection of scuttling site
3. July 2008	Award of Environmental Consultancy to WorleyParsons
4. June 2008	Gazettal of HMAS Adelaide Reserve
5. August 2008	Call for tenders for ship preparation and scuttling contract
6. September 2008	Australian Government handover of ship to NSW Government
7. November 2008	Application for a Sea Dumping Permit
<i>Project Hiatus due to funding issues</i>	
8. June 2009	Approval of additional project funding
9. June 2009	NSW Government Acceptance of Ship
10. June 2009	Award of ship preparation and scuttling contract
11. 21 st September - 18 th October 2009	Exhibition of Plan of Management fro HMAS Adelaide Reserve
12. 13 th October 2009	Invited tenders for Concept Investigation Jetty Terrigal Haven
13. 19 th October 2009	Call for Expressions of Interest for Ticketing, Booking and Marketing opportunity
23 rd October 2009	NATO Visit to Ship
14. 9 th November 2009	Launch of Ex-HMAS Adelaide Artificial Reef 'Brand'
15. 9 th November 2009	Launch of Project Website
16. 12 th November 2009	First DEWHA Environmental Inspection of the Ex-HMAS ADELAIDE
17. 12 th November 2009	Removal of Main Mast
18. 12 th November 2009	Launch of Project Website
19. 27 th November 2009	Target Scuttling Date and Official Ball Announced
20. 1 st December 2009	Call for Tenders for Commercial Moorings
21. December 2009	Environmental Assessments Complete
22. December 2009	Scuttling Event declared State Significant Event
23. 17 th December 2009	Second DEWHA Environmental Inspection of the Ex-HMAS ADELAIDE
24. 21 st December 2009	Close tenders for Commercial Moorings
25. 28 th January 2010	Placement of Buoy at Scuttling Site and Surf Carnival
26. 8 th February 2010	Environmental Assessment Determined
27. 25 th February 2010	Dive Design Completed and Constructed
28. 25 th February 2010	Final DEWHA Inspection
<i>Upcoming Milestones</i>	
29. March 2010	Award of licences to commercial moorings at dive site

30.	March 2010	Award of Ticketing, Booking and Marketing opportunity
31.	March 2010	Ex-HMAS ADELAIDE Plan of Management Gazetted
32.	17 th March 2010	Final Tour of Dive Design by Rescue Personnel/Dive Operators
33.	March 2010	Final Scuttling Preparations Made
34.	March 2010	Receipt of Sea Dumping Permit
	Date	Event
35.	March 2010	Confirmation of Scuttling date
36.	Target Date 25 th March 2010	Ex-HMAS Adelaide Towed from Sydney harbour to site
37.	Target Date 27 th March 2010	Scuttling of the Ex-HMAS Adelaide
38.	Target Date 27 th March 2010	Post scuttling Activities (inspections, installation of moorings, navigation aids)
39.	27 th March 2010	Official Reef & Rescue Ball
40.	Target Date 3 rd April 2010	First Dive on Ex-HMAS ADELAIDE Dive Site

2. Consultation Summary

A significant amount of previous consultation has been undertaken in conjunction with various project activities. The most significant activities include:

- In early 2008 an Interagency Steering Committee was convened with membership as described in Section 2. Activities undertaken with this group include:
 - Regular meetings to provide updates on project progress
 - Site Visit in February 2008; and
 - Risk Assessment Workshop (February 2008).
- In February 2008 a meeting was held with peak bodies in the dive industry to understand their requirements, desires and concerns for the project. This meeting included representatives of the local dive clubs, regulating and instructing authorities and the Central Coast Artificial Reef Project (CCARP).
- In May 2008 a presentation was given to the Central Coast Community Environment Network and Marine Discovery Centre members to brief participants on the project.
- On 6th May 2008 a publicly advertised meeting was held aimed at those with an interest in the project. A project briefing was provided and participants had the opportunity to ask questions.
- In June 2008 an advertised public meeting was held at the Terrigal SLSC in association with the Central Coast Marine Discovery Centre to inform the interested public about the project. A presentation was provided.
- **HMAS Adelaide Reserve Plan of Management:** Consultation in association with the preparation of a Plan of Management for the Reserve over the water area has included:
 - A public meeting was held on 3rd November 2008 for any people interested in the project. Expressions of interest from people wishing to sit on the stakeholder reference group were sought at the meeting. A presentation was provided.
 - First reference group meeting to generate discussion on the Plan of Management and highlight issues in the management of reserve. All those interested in participating in the group were accommodated. (4th December 2008).
 - Second Reference group meeting in late December 2008 to discuss management objectives and actions.

- Third meeting in March 2009 to discuss the final draft Plan of Management prior to exhibition.
- On 6th March further consultation was undertaken with the commercial fishing industry to ascertain concerns. Issues raised included the need to limit the size of the reserve to ensure commercial fishing adjacent the nearby rock reefs could continue.
- Public meeting on 28th September 2009 for those with questions on the Plan of Management as exhibited. There was significant attendance at this meeting. No issues were raised other than the desire to permit recreational fishing at the dive site.

The Plan of Management was on exhibition from 21st September to 18th October 2009. Only one submission was received during this time. This submission was from the NSW Recreational Fishermen's Alliance requesting that fishing be permitted at the dive site. Fishing at the dive site is considered to be incompatible with diving and poses a safety risk. As such it was determined that the Plan as exhibited should not be amended. Based on this conclusion it was determined that there was no need for a further meeting of the stakeholder reference group.

The membership of the stakeholder reference group is given at Appendix B.

- **Environmental Reference Group:** Whilst the environmental aspects of the project are largely government by federal legislation an environmental reference group was convened to allow state agency and local stakeholder input to the environmental preparation of the ship. Membership of the group is listed at Appendix B. This group has met on one occasion and toured the ship on 8th October 2009. Attendance at this tour was minimal and the group did not express an interest in continuing with the process.
- **Environmental Assessment:** The environmental assessment has been prepared based on the issues identified through the preparation of the Site Selection Study. The site selection study was finished in June 2008 and placed on the project website at this point. Any issues raised through the process of preparing the Plan of Management were also addressed. As these primarily related to the permissibility of fishing within the reserve they were not specifically addressed in the environmental assessment.

The environmental assessment was reviewed by the members of the environmental reference group. Comment was also sought from the relevant state and federal agencies including Department of Environment Climate Change and Water, Department of Industry and Investment, NSW Maritime, Tourism NSW, Department of Premier and Cabinet, Gosford City Council and the Department of Environment Water Heritage and the Arts.

- **Dive Design Reference Group:** A Reference Group was formed to allow local and industry participation in the dive design process. The group has membership from local clubs and dive industry stakeholders. The group has met as follows:
 - A workshop held to review the preliminary design was held on 24th September 2009
 - The group conducted a tour of the ship and reviewed initial work on 9th October.
 - A small subset of the group undertook a tour of the ship on 16th December 2009 to review progress.
 - The group will review the finished product and take video footage and a photographic record of the work on approx 17th March 2010. This group includes emergency response personnel (NSW Police Divers) who may be responsible for rescues at the dive site.
- **Scuttling Management Working Group:** This group was formed with a view to ensuring the integrated and coordinated management of crowds and activities on land and water during the scuttling process. The group met on one occasion on 30th September 2009. Subsequent to this meeting the Community Engagement and Events Division (CEED) of the Department of Premier and Cabinet took over the running of the event and consultation with relevant agencies was undertaken through this forum.
- **Event Management:** The coordination of the event is being undertaken through the Community Engagement and Events Division (CEED) of the Department of Premier and

Cabinet. Consultation has centred on the management of logistics on the day of the scuttling. Meetings have included:

- All Agency Meetings (membership of the All Agency Group is at Appendix B)
- Maritime Operations Meetings to plan for coordination for the water area for the event (membership of the All Agency Group is at Appendix B)
- Traffic and Transport coordination meetings (membership of the All Agency Group is at Appendix B)
- Community Event Planning Meetings (membership of the All Agency Group is at Appendix B)
- Weekly project team meetings (CEED, LPMA and DPC)
- **Project Website:** The project website has been operation since April 2008. The website has enabled community members to contact the project team and request information. The predominant communication through this medium since the inception of the site has been that from ex-servicemen who have served on the Ex-HMAS ADELAIDE. More recently enquiries have centred on the event itself.

IMPORTANT NOTE:

The consultation recorded here is only that conducted by the LPMA. The Central Coast Artificial Reef Project (CCARP) began consultation regarding the project in 2000. Important points to note include:

- A public meeting was held at the University of Newcastle Ourimbah Campus in 2000. Approximately 250 people attended. A presentation was given which included the proposed scuttling location as has now been confirmed.
- The CCARP website regarding the project has been in operation since 2000
- CCARP consulted with all local Members of Parliament (both sitting and in opposition) and Gosford and Wyong Councils at this time.

3. Consultation Details

Stakeholders were formed into various groups as relates to their area of interest. The membership of these groups is outlined in Appendix B. Note that those activities already completed are in italics/grey:

Group	Process	Timing
<i>Agencies, Stakeholders and Peak Bodies</i>		
1. Interagency Steering Committee	<ul style="list-style-type: none"> <i>Initial Meeting</i> <i>Site Visit</i> <i>Risk Assessment Workshop</i> <i>Progress Meetings</i> <i>Comment on HMAS Adelaide Reserve Plan of Management</i> Advice on an Agency basis as required 	<i>January 2008</i> <i>February 2008</i> <i>February 2008</i> <i>March 2008</i> <i>April 2008</i> <i>May 2008</i> <i>March 2009</i> Ongoing
2. Plan of Management Reference Group	<ul style="list-style-type: none"> <i>Public stakeholder meeting to provide advice on the project and the PoM</i> <i>First Reference Group Meeting – Issues</i> <i>Second Reference group Meeting – Objectives</i> <i>Third Reference Group Meeting – Endorsement of PoM for Exhibition</i> <i>Public Meeting for PoM</i> Gazettal of PoM 	<i>November 2008</i> <i>4th December 2008</i> <i>December 2008</i> <i>March 2009</i> <i>28th September 2009</i> March 2010
3. Ship Preparation Stakeholder Group	<ul style="list-style-type: none"> <i>Stakeholder meeting and tour of Ex-HMAS Adelaide to advise re the project and identify correct stakeholders for further consultation. Invitation extended to all members of previous stakeholder groups.</i> 	<i>August 2009</i>
4. Dive Design Reference Group	<ul style="list-style-type: none"> <i>Initial Dive Design Reference Group Meeting – Terms of Reference and Presentation of Preliminary Design (Kariong)</i> <i>Initial Dive Design Tour – Marked up areas of Ship</i> <i>Tour of Prepared Ship (limited areas)</i> Tour of final design and documentation for dissemination to user groups First Dive of ADELAIDE 	<i>24th Sept 2009</i> <i>9th Oct 2009</i> <i>16th Dec 2009</i> March 2009 April 2009
5. Environmental Preparation Reference Group	<ul style="list-style-type: none"> <i>Initial Tour of Ship with Environmental consultants</i> <i>Email updates on ship preparation progress and issues</i> <i>Review of draft Environmental Assessment</i> 	<i>8th Oct 2009</i> <i>Ongoing</i> <i>December 2009</i>
6. Scuttling Management Working Group	<ul style="list-style-type: none"> <i>Initial Scuttling Management Workshop – Issues, Resources and Responsibilities Identification (Kariong)</i> <i>Consultation with Individual Agencies for Agency requirements</i> <i>Circulation of Draft Executive Operations Order for Scuttling Event</i> <i>NB – Group absorbed at relevant agency level into All Agency Event Committee run through CEED</i> 	<i>30th Sept 2009</i> <i>October 2009</i> <i>Dec 2009</i> <i>Dec 2009</i>
7. All Agency Event Committee	<ul style="list-style-type: none"> <i>Initial Meeting</i> <i>Tour of Event Area</i> 	<i>11th December 2009</i> <i>14th January 2010</i>

Group	Process	Timing
	<ul style="list-style-type: none"> Second Meeting Third Meeting Scenario Workshop Post Event Debrief 	20 th January 2010 15 th February 2010 16 th March 2010 14 th April 2010
8. Maritime Operations Group	<ul style="list-style-type: none"> Initial workshop First Operational meeting Second Operational Meeting Third Operational Meeting 	12 th January 2010 23 rd February 2010 9 th March 2010
9. Traffic and Transport Committee	<ul style="list-style-type: none"> First Meeting Tour of Event Area Second Meeting Third Meeting Debrief 	20 th January 12 th February 15 th February 2010 16 th March 2010 14 th April 2010
10. Emergency Response Committee	<ul style="list-style-type: none"> Tour of impacted area Regular meetings reporting back to All Agency Meetings to coordinate event management 	12 th February 2010
11. Community Events Committee	<ul style="list-style-type: none"> Weekly meetings from January 2010 to organise detail of events on land 	Ongoing
General Community		
General Community Consultation	CCARP Public meeting at Ourimbah Campus (250 attendees) Public meeting at Central Coast Leagues Club (approx 60 attendees) Public meeting at Terrigal SLSC (approx 100 attendees) Public Meeting at Gosford RSL (approx 100 attendees) Public Information Session at Trojans Rugby League Club Presentation to Council Meeting Public Meeting at Focus on the Coast CCARP Website Operational 2000 Project Website Operational April 2008 Community kept continually updated via: <ul style="list-style-type: none"> Updates on project website Release of project documentation via project website Media releases regarding the event and the scuttling Media campaign immediate prior to scuttling regarding scuttling arrangements 	2000 May 2008 June 2008 November 2008 September 2009 September 2009 February 2010 2000 April 2008

4. Consulted Stakeholders

List of the identified stakeholders is as follows. The individuals listed served at contacts for each organisation.

Group	Role/Area of Interest	Representative
1. Australian Government	Minister for Defence Minister for Environment	The Hon John Faulkner The Hon Peter Garret

Group	Role/Area of Interest	Representative
2. State Government	Minister for Lands Premier & Minister for the Central Coast	The Hon Tony Kelly The Hon Nathan Rees
3. Local Government	Mayor Gosford City Council Mayor Wyong Shire Council	Councillor Chris Holstein Councillor Bob Graham
4. Land & Property Management Authority	Chief Executive Officer General Manager Crown Lands	Warwick Watkins Graham Harding
Agency/Authority		
5. Land & Property Management Authority	Owner of site and wreck. Implementation Agency. Long term responsibility for management of wreck.	
6. NSW Maritime	Management of waterway. Impact on maritime infrastructure in The Haven. Long term responsibility for boating compliance. Key role in management of the scuttling event on water.	
7. Tourism NSW	Tourism opportunity presented by wreck. Involvement in public activities in lead up to sinking.	
8. Department of Environment Climate Change & Water	Environmental impacts of sinking activity. Long term environmental benefits presented by wreck. Also NPWS protection of wildlife during event	
9. Department of Industry and Investment (Fisheries & Mineral Resources)	Impact on existing fishing activities, positive impact on fish stocks, impact of location on offshore sand reserves. Long term responsibility for fisheries exclusion zone.	
10. Department of Planning	Approval framework for activity. Note that it has been determined that it is a Part 5 matter.	
11. Workcover	Worksite activities, use of explosives, management of scuttling.	
12. Department of Premier & Cabinet	Initial agency for project, Now part of project Control Group. Responsible for communications and event management.	
13. Treasury	NSW govt funding of \$250K	
14. Sydney Ports Corporation	Lease of berth of ship preparation. Navigation of ship out of Sydney Harbour. Pilotage and harbour control.	
15. NSW Water Police	Management of towing of ship to sinking site and assistance in maintaining exclusion zone during scuttling.	
16. Gosford City Council	Trust Manager for The Haven. Impact of project on local area. Involvement in community events surrounding scuttling.	
17. RAN Clearance Divers	Assistance with scuttling. Expertise in dive design.	
18. Army Divers	Assistance with scuttling. Expertise in dive design.	
19. NSW Police Divers	Long term responsibility for incident management. Assistance with dive design.	
20. NSW Police LAC Broken Bay	Assistance with Scuttling Management	
21. RAN Port Services Manager	Assistance with Scuttling Management	
22. Civil Aviation Authority	Assistance with Scuttling Management - Airspace	

Group	Role/Area of Interest	Representative
23. Commonwealth Department of Environment Water Heritage & the Arts	Approval agency for scuttling activity via Sea Dumping Permit.	
24. Department of Defence	Australian Government funding of \$5.8M.	
25. Roads and Traffic Management Authority	Management of traffic and access to scuttling event. Planning and implementation	
26. NSW Transport and Infrastructure	Management of traffic and access to scuttling event. Planning and implementation	
27. NSW Police Major Events and Incidents Unit	Management of scuttling event. Command and coordination role on the day.	
28. NSW Ambulance Service	Management of public health and safety and emergency response for scuttling event.	
29. Royal Australian Navy	Former owner of ship. Representation on the day of scuttling.	
30. Community Engagement and Events	Management and coordination of event activities on land	
31. Events NSW	The scuttling event	
Community Groups/Peak Bodies		
32. Central Coast Artificial Reef Project	Original lobby group that secured the HMAS Adelaide as a dive wreck for Terrigal	
33. University of Newcastle	Short term environmental impacts and long term research opportunities. Member of CCARP.	
34. Central Coast Community Environment Network	Short term environmental impacts and long term research benefits and opportunities	
35. Royal Volunteer Coast Guard (now Royal Volunteer Marine Rescue)	Water based management during scuttling. Long term compliance and rescue activities.	
36. Terrigal Sea Rescue (now Royal Volunteer Marine Rescue)	Water based management during scuttling. Long term compliance and rescue activities.	
37. Terrigal Underwater Group	Local dive club. End user. Contribute to the dive design.	
38. Brisbane Water Aqualung Club	Local dive club. End user. Contribute to the dive design.	
39. Scuba Clubs of NSW	End user. Contribute to the dive design	
40. Surfrider Foundation	Impact of wreck on local surf environment	
41. Marine Discovery Centre	Short term environmental impacts and long term research benefits and opportunities. Also looking for possible commercial/management opportunity	
42. Terrigal Haven Professional Fishermens Association	Possible impact on local commercial fishing grounds – both wreck and fishing closure.	
43. Recreational Fishing Alliance	Possible impact on recreational fishing activities (fishing closure).	
44. Central Coast Fishing Charter Operators	Possible impact on recreational fishing activities (fishing closure).	
45. PADI	Dive standards and training. Input to dive design.	
46. Central Coast Surf Life Saving	Management of Crowds – Scuttling management	

<i>Group</i>	<i>Role/Area of Interest</i>	<i>Representative</i>
47. Westpac Rescue Helicopter Service	Assistance with Scuttling Management	
48. Terrigal SLSC	Management of Crowds – Scuttling management	
49. Avoca SLSC	Management of Crowds – Scuttling management	
50. North Avoca SLSC	Management of Crowds – Scuttling management	
51. Scuba Schools International (SSI)	Dive standards and training. Input to dive design.	
52. Central Coast Tourism	Future tourist attraction	
53. Commercial Vessels Association	Scuttling event	
54. Royal Volunteer Marine Rescue	Scuttling event	
<i>Individuals</i>		
55. Commercial Dive Operator	Dive Terrigal	
56. Commercial Dive Operator	ProDive	
57. Commercial Dive Operator	Scuba Shack	
58. Commercial Dive Operator	Dive Imports Australia	
59. Documentaries	SBS Filming	
60. Documentaries	Video Spark	
<i>Internal LPMA Stakeholders</i>		
61. Land Management	Reserves, Plan of Management	
62. Commercial Management	Development sites Terrigal Haven, commercial Operation	
63. Financial Management	Management of budgets and funding	
64. Communications Management	Assistance with project communications	

5. Avoca Surfers

In response to questions from local surfers the LPMA and DPC met with around 40 to 50 people at Avoca North SLSC on 29th January 2010. A presentation was provided to the group on the project and scuttling event in general and detailed information was provided on the potential for environmental impact with particular focus on oceanographic and coastal processes.

The main concerns of the group were at that point:

- They were not previously aware that the Ex-HMAS ADELAIDE was to be sunk in waters off Avoca Beach but believed it to be off Terrigal.
- They did not want the Ex-HMAS ADELAIDE sunk in waters off their beach
- They believed their surf conditions would be adversely impacted
- They believed the ship would impact the movement of sediment in the bay and increase erosion of the beach.

The LPMA's consultant oceanographic expert explained the findings of comprehensive investigations, including:

- There will be no measurable impact on swell conditions in the surrounding area

- There will be no measurable impact on surf conditions at the surrounding shoreline
- The ship will have no measurable impact on sediment movement in the bay. This means there will be no measurable impact on the Avoca beach shoreline and the ship will not cause or exacerbate any erosion of the surrounding shoreline.
- Localised scouring in the immediate vicinity of the ship will not impact the stability of the vessel.
- The ship is stable in all swell conditions
- Commonly occurring ocean and coastal currents such as tide and wind driven currents are not significant at the scuttling site

6. Parallel Activities

It is noted that the Crown reserve at Terrigal Haven has the potential to be developed as a land base for the Ex-HMAS Adelaide dive site. The reserve area is under the trust management of Gosford City Council. GCC have recently amended the Terrigal Haven Plan of Management to allow for potential development in this area to support the project.

LPMA are also separately pursuing concept designs for enhanced maritime facilities at The Haven to facilitate safe boating.

Note: Most names have been removed from the representative column to protect privacy