

**INQUIRY INTO PERFORMANCE OF THE NSW
ENVIRONMENT PROTECTION AUTHORITY**

Name: Name suppressed

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Partially Confidential

27th August 2014

The Hon Robert Brown MLC
Chair, General Purpose Standing Committee No 5
Legislative Council
NSW Parliament, Macquarie Street
SYDNEY NSW 2000
cc: Jamie Parker MP, Member for Balmain

Dear Chair

RE: Submission to Inquiry into the performance of the NSW Environmental Protection Authority

Further to 1. (b) (v) of the Inquiry's terms of reference, I would like to make the following comments about the regulation of cruise passenger ships at the White Bay Cruise Terminal at Balmain:

I am a resident living close to the White Bay Cruise ship terminal and would like to highlight these facts regarding the ships that use the terminal:

- 1. Fuel sulphur content is up to 35 times higher than allowed in Europe and North America.** Cruise ships in Sydney Harbour are allowed to burn fuel with a sulphur content of up to 3.5%. In North America, once ships come within 200 nautical miles of the east or west coastlines, they are not allowed to burn more than 1% sulphur fuel and this will further reduce to 0.1% sulphur by January 2015. In Europe, ships in port are also limited to 0.1% sulphur fuel.
- 2. Shore-to-ship power has not been provided.** Over 100 ports around the world now provide the ability for ships to connect into the local power grid so that they can switch off their engines stopping dangerous diesel emissions in port. Whilst there was a requirement to allow for shore power at the White Bay Cruise Terminal in the future, there is no requirement to actually provide it and as predicted Sydney Ports are reluctant to embrace shore power at the site.
- 3. Emissions monitoring criteria is inadequate and unsafe.** It is well known that diesel emissions are carcinogenic containing the dangerous toxins: sulphur dioxide, nitrogen oxides, particulate matter (both PM10 and the finer and more deadly PM2.5), benzene, toluene and formaldehyde. Yet, monitoring of the White Bay Cruise Terminal measures only two toxins – sulphur dioxide and PM10. It completely ignores the other dangerous emissions. By way of example, benzene is a carcinogen for which there is no safe level of exposure. Further, the criteria against which sulphur dioxide is being monitored is woefully inadequate, with the 24 hour allowable limit 11.4 times higher than the World Health Organisation recommends.
- 4. Continual and significant breaches in noise levels produced by the massive ships engines, which continually run in 'hotelling' mode whilst in port.**
- 5. There are no penalties for these significant and harmful breaches of the approved planning conditions.** There is no provision for cruise companies to be penalised for breaches of the regulations that do exist (inadequate as they are). For example, monitoring has shown that the cruise ships have breached noise criteria over 75% of

the time, yet the only requirement in the planning approval to address such breaches is for more monitoring to be conducted.

I am particularly concerned about the noise (both engine noise and announcements that can be clearly heard throughout the peninsula) and diesel emissions when a ship is docked at the terminal.

My understanding was that ships would not be docked overnight at the terminal and the cruise lines appear to flout these rules regularly which, together with the issues above, are both very frustrating and endangering the health of residents.

Sydney is a prime destination for Cruise lines and there is no danger the city will 'lose out' to other cities if stricter conditions are implemented so I urge you to carry out the necessary changes to the rules governing the docking of cruise ships at the terminal as soon as possible for the benefit of all residents of Sydney.

Yours Sincerely,