

**Submission
No 250**

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

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Late Submission to the Parliamentary Enquiry in the White Bay Cruise Ship Terminal

The Overseas Cruise Ship Terminal in White Bay was approved by the previous government, but with several flaws in operation. The main problem is the health risk associated with air pollution in the Harbour resulting from the use of high-sulphur bunker fuel in the ships' electricity generators, running continuously while the ships are docked, in the absence of shore-to-ship electricity supply.

This practice is unusual, at other ports around the world, for two reasons: first, ports in North America and Europe mandate bunker oil with up to 35 times less sulphur than allowed in NSW. (In California, the level is 0.1% sulphur by weight.). Second, many other ports supply shore-to-ship electricity, which obviates the need for generators to run in port.

I understand that the Commonwealth plans to reduce the maximum sulphur content in ships' fuels to European levels from the current 3.5% maximum by 2020. A faster solution to the air-pollution issues of docked ships would be to require them to use shore-to-ship electricity while in port. This would need some investment in electricity supply infrastructure by government, which could be recouped by charging the cruise ship companies a surcharge on their docking fees. Such provision would also have the benefit of reducing noise pollution from the ships in White Bay.

The Terminal operates now as planned by the previous government. This government has the opportunity of reducing the health risks to the hundred thousand or so residents around the Harbour which result from the errors of the previous government. I hope it does so.

Yours faithfully,

Emeritus Professor Robert Marks, FRSN