

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

Name: Mr Howard Lovatt

Date received: 18/08/2014

The Hon Robert Brown MLC
Chair, General Purpose Standing Committee No 5
Legislative Council
NSW Parliament, Macquarie Street
SYDNEY NSW 2000

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 and in particular the pollution controls that I feel are inadequate at many levels including:

1. The pollutants monitored (only sulphur dioxide and PM10 particles)
2. The limits set are higher than the UN recommends
3. There is no way to penalise an operator for a conditions breach
4. Low grade fuel is allowed
5. There is no grid electricity supply to the ships

In light of these concerns may I suggest that the committee recommends:

1. Ships should be required to use of 0.1 per cent sulphur fuel within 200 nautical miles of the port
2. Shore-to-ship power should be required for all ships using the port
3. Provision for fining operators that breach the above conditions and any other conditions (e.g. noise), should be made
4. The UN's recommended monitoring and limits should be applied for at least: sulphur oxides (SOX), nitrogen oxides (NOX), particulate matter (PM10 and PM2.5), benzene, toluene, and formaldehyde

I note that my above items 1 & 2 were also recommended by DECCW (now EPA) and are common in other ports, for item 3 that monitoring has shown noise breaches have already occurred and yet no meaningful action can be taken, and for item 4 this suggestion is inline with the UN's World Health Organisation guidelines and a recent study by Sydney's Woolcock Institute of Medical Research.

Yours sincerely,

Howard Lovatt (on behalf of the Lovatt family)