

**Submission  
No 248**

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

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**Submission to the NSW Parliament Upper House Inquiry into the performance of the NSW Environmental Protection Authority**

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**1) Sydney Harbor ship emission standards are 35 times worse than those for European and North American ports.**

Ships entering Sydney Harbor can now legally use low grade Bunker Fuel with a sulphur dioxide content up to 3,500 times more than road diesel. This would be unacceptable in North America and Europe, who protect the health of their citizens by restricting the sulphur content for ships in port to **0.1% vs 3.5%** in Sydney Harbour i.e. **35 times worse than European and North American ports.**

- **If these standard are good enough for them why are they not good enough for us?**

**2) These ship emissions are toxic and have serious health implications**

As Professor Alan Rosen AO, a distinguished health professional explains, the health effects of these levels are pollution are profound and well established: *“There appears to be a strong association, well documented in the clinical literature, between the high levels of Benzene, Toluene, Formaldehyde, Sulphur Dioxide , Particulate Matter and Nitrous Oxide in the inadequately regulated and highly toxic content of the fuels being used, and the longer term severe health deterioration, particularly anaemia, leukemia and other carcinogenic effects. These risks to a concentrated urban residential population cannot be ignored by health authorities or government. There are no grounds to plead ignorance by government regarding these well documented risks”.*

- **This is not acceptable in a modern developed country like Australia.**
- **Why doesn't the health of Sydney-siders matter as much as Europeans and North Americans?**

**4) Why doesn't our government do something about it? Is it because they don't know or don't care?**

**5) Why cannot the State Government simply mandate that the ships have to meet world's best practice - European and North American port emission standards?**

These are the basic issue that must be a central consideration for this parliamentary inquiry. It is, of course, of particular concern for residents living close to the White Bay Cruise Liner Terminal, where I live, but it is a far wider and more serious issue than this. It concerns all those who use and live by Sydney Harbor and, more broadly all those who use or live near ports in Australia.

**6) What are the Possible Reasons for not acting now?**

Reason 1: *More stringent emission standards will be introduced by 2020 in line with agreed world standards.*

But this is way too late and the State Minister said so in parliament a week or so ago. Think, for example, of our kids, now in primary schools adjacent to White Bay, who will suffer and potentially damage their health for life. Can we really do this?

Reason 2: *50% of existing ships using the harbor have engines that are not able to handle higher grade fuel.*

50% is better than nothing! We now provide the cruise ship companies with an opportunity to use old inferior ships in our harbor because of the regulations. Require them to meet the standards and they will be force to upgrade their ships. Some cruise lines boast, in the Northern Hemisphere, about their environmental responsibility, why not here?

Reason 3: *Changing the regulations will damage the cruise line industry in Sydney.*

Sydney Harbor is a jewel in the world and any cruise liner that operates in this region has to come to Sydney or risk losing customers. The market is booming and will continue to grow and cruise lines will need to invest to keep competitive. If existing companies won't do it others will.

A comparable example is the case of river cruising in Europe. At one time the market was dominated by local river monopolies who were raking it in as the market expanded but quality was poor and declining. New entrants changed this and drove out some of the old, lazy, no longer competitive ones.

Reason 4: *Ship to Shore power is costly and will take time to implement.*

If ships can plug in to onshore power, emissions and pollution cease. White Bay at present does not offer this facility. Garden Island does but there are logistic issues and it is a naval base. This can be rectified but it will take some time and investment. But the sooner we start the quicker we finish. This is investing in infrastructure to enable this fast growing industry to grow, to the benefit of all.

Reason 5: *It is a Federal regulatory issue not State.*

This is technically true but NSW is free to act on its own behalf on such matters. California did in the USA. Someone has to take the lead and why not Sydney Harbor, the most famous Australian harbor of all?

Reason 6: *Bunker fuel can be supplied from NSW Caltex refinery but higher grade fuel will need to be imported.*

Most fuel in Australia is imported, the Caltex refinery is not viable long term and the extra costs to the cruise liners is trivial compared to the returns and could easily be recouped from passengers.

#### **6) What happens if the government does not act now?**

- Damage to health will grow and become a much bigger issue with increasing costs to people, health care systems and society.
- Protests and protesters pressure will continue to grow in power and frustration.
- Class actions will begin
- More extreme protest actions take place, gaining more attention
- There will be political implications

#### **7) What happens if the government does act now?**

- Health effects minimized
- Protest pressure reduced
- Vote winning – no downside here! Cruise passengers don't vote.
- Cruise ship companies unhappy – but they enjoy the business, a growing industry and benefit from the attractiveness of our harbor.
- Costs of cruises increases – minimal and not noticeable as a percent of total cost. Could even be positioned as an environmental responsibility and contribution to maintaining the health of Sydney Harbor for the benefit of all.

### **Conclusion**

Sydney Harbor is one of the jewels of the world and should be operated at world's best standards. Cruise ships are a fast growing industry with the baby boomers retiring. There are great opportunities and benefits arising from this for Australia and Sydney. But the damaging pollution and health effects will only get worse unless something is done – now.

#### **Other issues?**

There are other negative consequences related to the operation of the White Bay terminal, such as noise and vibrations, but I regard these as secondary and a potential distraction that should not dilute what should be the main focus of this inquiry and is clear cut.

I also don't want to get into a debate about whether the cruise liner terminal should ever have been located there in the first place. The fact is it is there and we need to do something about the serious pollution and health impacts.