

The Secretary  
Department of Planning, Industry and Environment  
GPO Box 39  
Sydney NSW 2001

Attention: Dominic Crinnion

Dear Dominic,

### **Eden Cruise Facility (State Significant Infrastructure 7734) – Conditions D12, D13 and E21 Air Quality Monitoring**

Reference is made to condition D12 of the State Significant Infrastructure (7734) approval (the SSI approval) which requires air quality monitoring during the cruise season for a period of five years from commencement of operation or another time period as agreed or directed by the Secretary. Reference is also made to Conditions E21 and D13 of the SSI approval regarding air quality monitoring during cruise seasons.

Port Authority of NSW (Port Authority) carried out continuous air quality monitoring during the 2019/20 cruise season. Air quality monitoring during this initial cruise season was continuous from the first to the last ship of the season which is well in excess of the requirement in condition E21 of monitoring “*at least two days prior to the arrival of the **first three cruise ships of the season**, while they are at berth and for at least two days following departure. Where there is less than two days between departure of a cruise ship and arrival of the next cruise ship, monitoring must continue until there is at least two days between ship departures and arrivals*”. During the 2019/20 cruise season a total of 18 cruise ships visited the Eden Cruise Facility.

With the commencement of the COVID-19 pandemic and the ban of cruise ships in Australia in March 2020, the Department of Planning and Environment (DPE) in correspondence dated 5/5/20 agreed to suspend the air quality monitoring program during the 2020/21 and 2021/22 cruise seasons, with monitoring required to recommenced to cover the 2022/23 cruise season.

The ban on cruise ship arrivals in Australia was lifted in April 2022. With the lifting of the ban, cruise ships will start visiting Eden gradually from the second half of 2022.

In accordance with condition D13 of the SSI approval, Port Authority submitted an Air Quality Monitoring Report Summary to DPE in 2020. The Air Quality Monitoring Report Summary was included in the 2019/20 Operational Compliance Report submitted on the 7/7/20 and showed no exceedances of the air quality criteria for any parameter as a result of the presence of cruise ships. The report concluded the following:

- No exceedances of the 10-minute average air quality criterion for SO<sub>2</sub> were recorded at any time during the reporting period.
- No exceedances of the 1-hour air quality criterion for SO<sub>2</sub> were recorded at any time during the reporting period.

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- No exceedances of the 24-hour average air quality criterion for SO<sub>2</sub> were recorded at any time during the reporting period
- No exceedances of the 1-hour air quality criterion for NO<sub>2</sub> were recorded at any time during the reporting period.
- There were no exceedances of the NSW EPA 24-hour PM<sub>2.5</sub> concentration criterion (25 µg/m<sup>3</sup>) directly caused by cruise ships.
- The 24-hour PM<sub>2.5</sub> criterion was exceeded multiple days during the bushfires in November 2019, December 2019 and January 2020. One of these exceedances occurred during one cruise ship day (1 November 2019). However, it was concluded that the multiple exceedances of the PM<sub>2.5</sub> concentration that occurred during the reporting period were caused by bushfires, including that on the 1 November 2019, and these exceedances were also recorded at other ambient air quality monitoring stations in the region.
- The data also showed that typically there are no significant differences in air quality during cruise days and non-cruise days, or between air quality data in the vicinity of the Eden Cruise Facility and other regional air quality monitoring stations.

In addition to the lack of exceedances during the 18 cruise ship visits in the 2019/20 cruise season, no complaints were received at any time during cruise ship visits.

Based on the conclusive evidence of the air quality monitoring program, Port Authority considers that there is no reason to continue the air quality program in its current format as the data clearly shows that the local air quality is not impacted by cruise ships of the sizes currently allowed to visit the Facility.

Consequently, in accordance with Condition D12, Port Authority seeks the agreement from the Secretary of DPE to continue with the suspension of the Air Quality Operation Monitoring Program during the 2022/23 cruise season and future seasons, until larger cruise ships are allowed to visit the Facility. In that regard, Port Authority is currently preparing a modification of the SSI approval (MOD 3) to allow larger cruise ships to visit the Eden Cruise Facility. Upon approval of MOD3, Port Authority will resume the air quality monitoring program for the larger cruise ships in order to validate the results of MOD3 air quality modelling investigations results. Information on MOD3 is available in the Scoping Report submitted to DPE in April 2022 (<https://www.planningportal.nsw.gov.au/major-projects/projects/eden-breakwater-wharf-extension-modification-3>).

Please do not hesitate to contact Ricardo Prieto-Curiel, Senior Environmental Planner, at [rprieto-curiel@portauthoritynsw.com.au](mailto:rprieto-curiel@portauthoritynsw.com.au) or 0488220642 should you require further information.

Yours sincerely,

**Ricardo Prieto-Curiel**

Senior Environmental Planner

14 June 2022