



Cnr Princes Hwy & Mitchell St,  
PO Box 435  
EDEN NSW 2551  
P: 02 6496 1953  
F: 02 6496 4425  
[info@visiteden.com.au](mailto:info@visiteden.com.au)

ABN: 28 749 394 612

## Proposed Operational Conditions for Cruise Ships Port of Eden

### Submission from Eden Tourism Incorporated

We understand that the NSW Department of Industry is seeking modification to several conditions of the Infrastructure Approval SSI 7734 for the Eden Breakwater Wharf Extension project and that the conditions that are of concern are E17, E18, E20 and E22 that relate to the environmental management of noise, vibration and air quality as well as complaint handling procedures.

Eden Tourism Incorporated manages the Eden Visitor Information Centre and actively support 'Cruise Eden' in welcoming and providing information to cruise ship passengers visiting the Port of Eden. The completion of the project will provide considerable benefits to the local economy by allowing a range of cruise ships to access the port and raise the profile of Eden and the Sapphire Coast. We believe that if the requested modifications are not accepted the Port of Eden, as a destination port will be compromised which will in turn impact on the local and regional economy.

### Proposed Operational Conditions: 0.1% Sulphur Content Fuel

We understand that the majority of cruise ships, as well as all other ships visiting the Port of Eden and all other ports across Australia (with the exception of Sydney) use bunker fuel when at berth and that this fuel has a higher sulphur content. We also understand that The Australian Maritime Safety Authority (AMSA) has directed cruise ships to use, when at berth in Sydney Harbour:

- low sulphur fuel with a sulphur content of less than 0.1% or
- approved air pollution control equipment that reduces emissions to an equivalent level to using low sulphur fuel, or
- a power source external to the vessel; or
- a combination of any of the above measures.

Currently, the Port of Eden is excluded from AMSA requirements with respect to the use of low sulphur fuel by cruise ships at berth and in transit.

The International Maritime Organisation (IMO), under the International Convention for the Prevention of Pollution from Ships (MARPOL) has set a global limit for sulphur in fuel used on-board ships to 0.5% from 1 January 2020 and we believe that the cruise ship industry has been proactive in gearing up to meet these requirements. We also understand that many cruise ship operators have undertaken the installation and certification of Exhaust Gas Cleaning Systems (EGCS) on their vessels. As far as we can determine these systems have been installed and certified on 17 Carnival Cruise Line vessels, 13 Holland America Line vessels, 10 Princess Cruises vessels, seven Costa Cruises vessels, five AIDA Cruises vessels, four P&O Cruises UK vessels, three Cunard vessels and one P&O Cruises Australia vessel.

The proposed operational conditions (E20 (a)) require cruise ships visiting the Port of Eden to use 0.1% sulphur content fuel and we understand that cruise ships operating in Australian waters carry just enough 0.1% sulphur content fuel to comply with regulations in place when visiting Sydney. In order to comply with the proposed conditions for Eden, cruise ships would need to carry additional 0.1% sulphur content fuel at considerable expense. It is estimated that this would add significant extra in costs to the cruise lines per ship, per visit to Eden and likely make such a visit uneconomic. This would limit the growth of the port and severely affect the momentum and work that 'Cruise Eden' has undertaken to promote Eden as a preferred port of call amongst cruise ship operators.

As part of the Environmental Impact Statement for the project modelling was undertaken for three fuel sources: residual oil fuels with 2.7% sulphur, marine distillate with 0.5% sulphur and low sulphur fuels with 0.1% sulphur. The modelling results demonstrated that at the most affected sensitive receiver locations (i.e. dwellings) of the NSW EPA ambient impact assessment criteria would be complied with in relation to oxides of nitrogen emissions and particulate matter (PM2.5) for fuel sources. The modelling showed no exceedance of the sulphur dioxide (SO<sub>2</sub>) criteria for marine distillate or low sulphur fuels. For cruise ships using residual oil fuels, there were exceedances of the SO<sub>2</sub> and particulate matter criteria for the 1-hour and 24-hour averaging periods. However, the modelling was based on worst-case scenarios and the probability of an exceedance in practice would be low due to cruise ships not being at the berth every day of the year (i.e. only 60 ships would visit the area per year or only 7% of the time) and the maximum increments from ship emissions would also have to coincide with maximum background levels, along with worst-case dispersion meteorology when at the berth.

In addition, the project approval requires an Air Quality Monitoring Program, which will be used to understand the actual environmental impacts from the operations of cruise ships in Eden compared with ambient air quality standards.

We recommend that existing fuel requirements for cruise ships berthing at Eden be maintained from date of project completion until 1 January 2020, when global low sulphur fuel requirements of 0.5% under MARPOL come into place.

During the 10-month period between wharf completion and global parity on fuel requirements, various mitigation measures addressing the potential environmental impacts of cruise ships at berth will be incorporated into the Air Quality Management Plan. These include ongoing monitoring of fuel emissions, a 24-hour complaints handling mechanism, measures to minimise smoke emissions, and minimise offensive odours.

#### Proposed Operational Conditions: Noise & Vibration

The proposed condition (E17 (a)) requires that there be *“no deck announcements and music from open decks while in the Port of Eden or transit, with the exception of safety announcements”*.

While it is not an issue to restrict deck announcements while berthed, it is important to allow deck announcements while in transit. Deck announcements while enroute into and out Eden generally include necessary passenger movement information. With passenger numbers in the thousands, these are the only way important information can be relayed to this number of passengers efficiently; therefore we should not be restricting this information:

- Logistics
- Passenger movement
- Port announcements
- Announcements at these times are not entertainment related

It should be noted; any complaint received would be the subject of notification, investigation and close out processes in accordance with Noise Management OEMP Sub-plan.

We recommend that the condition be amended to exclude “in transit”.

#### Proposed Operational Conditions: Complaints

The proposed condition (E18) states that *“In the event of complaints from Sensitive Receivers in relation to a specific cruise ship, the source of the offensive noise must be identified and action taken to reduce noise levels with details submitted to the Secretary. The ship must not be permitted to berth at the SSI in the future, unless it can be demonstrated that measures have been taken to reduce noise levels”*.

We contend that while it is possible that a noise complaint may be received while the ship is in transit, or at berth, these noise complaints (along with all other complaints) would be the subject of notification, investigation and close out processes in accordance with Noise Management OEMP Sub-plan.

Action that would preclude a cruise ship not returning to Eden is an over-reaction that will negatively impact port ratings and limit future visitation. It is highly likely, with this condition in place, that this condition would potentially reduce the number of ships visiting Eden and may require the ship to anchor at a buoy to avoid the Infrastructure Approval condition. This opposes the purpose of the Breakwater Wharf Extension, with a detrimental impact to the local economy.

Condition E1 already precludes cruise ships permitting before 7:00am or after 10:00pm unless extenuating conditions apply, Ship arrivals generally take place between 7:00am and 10:00am with departures generally taking place between 3:00pm and 6:00pm. These hours are considered acceptable across most industries in terms of noise, therefore there is no reason to restrict this single industry when restrictions are not made across the board.

Indeed, noise from cruise ships relating to deck announcements would be intermittent, if at all, and would fall below the noise levels experienced in other industries such as construction and road works. A worst-case scenario from a cruise ship at berth (emergency announcement) would be a 15-minute average noise (LAeq, 15min). In this case, all reasonable and feasible noise mitigation options would be exercised.

We propose that Condition E18 be amended as follows:

“Where a complaint is received from a Sensitive Receiver in relation to a specific cruise ship at the SSI in the Port of Eden, the source and nature of the noise will be investigated. If there are further complaints or the investigation indicates ongoing exceedance of the predicted noise levels, reasonable and feasible measures shall be investigated and implemented where reasonable and feasible”.

## Summary

It is important to note that the Port of Eden is still a juvenile port that is very much in growth phase within the industry. Adding unnecessary limitations and restrictions will only serve to hamper its growth, which collectively we’ve worked so hard to achieve. As a non-marquee port, Eden does not yet have the runs on the board to exercise demands such as this, without negative implications such as reduced visitation.

The cruise business now accounts for 5% of annual visitation to the Sapphire Coast, along with significant roll on effect of return visitation. The 2017/18 cruise season was valued at \$8.1m to the local economy. This is an economic injection that our local businesses look forward to, and indeed count on. It is for this reason we support the modification of conditions, to ensure the ongoing growth of the Port of Eden.

Eden’s growth has now gained significant momentum and is projected to place the region as a major beneficiary of the cruise industry. This reason, along with the fact that many other regional ports are

looking for the same opportunities is a strong impetus to continue our progress without unnecessary limiting restrictions.

Thank you for the opportunity to make a submission on the Proposed Operational Conditions for Cruise Ships to the Port of Eden.

(signed)

Robert Sykes

Chair

Eden Tourism Incorporated.

21 July 2018