



NSW ENVIRONMENT PROTECTION AUTHORITY

**DRAFT PROTECTION OF THE ENVIRONMENT
OPERATIONS (CLEAN AIR) AMENDMENT (CRUISE SHIPS)
REGULATION 2015**

SUBMISSION

GREENWICH COMMUNITY ASSOCIATION INC

10 June 2015

Summary of Submission

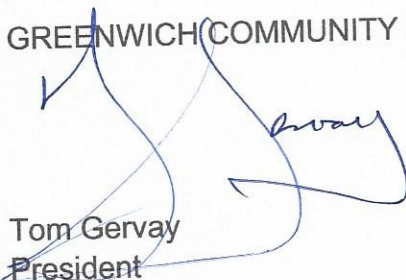
The Greenwich Community Association Inc makes the following submissions in respect of the draft Protection of the Environment Operations (Clean Air) Amendment (Cruise Ships) Regulation 2015:-

1. That the regulations should be extended to include all commercial ships at berth in Sydney Harbour from 1 October 2015 and all commercial vessels in NSW ports from 1 July 2016
2. That the regulations be amended, as required, to reflect the amendment outlined in point 1 above.

Material in support of the above submissions is contained in the attachment.

The Association welcomes the opportunity to meet with the EPA in respect of this submission.

GREENWICH COMMUNITY ASSOCIATION


Tom Gervay
President

M: 0418 230 889

E gervay@bigpond.com

GREENWICH COMMUNITY ASSOCIATION INC ATTACHMENT TO SUBMISSION

1. Status of Greenwich Community Association Incorporated

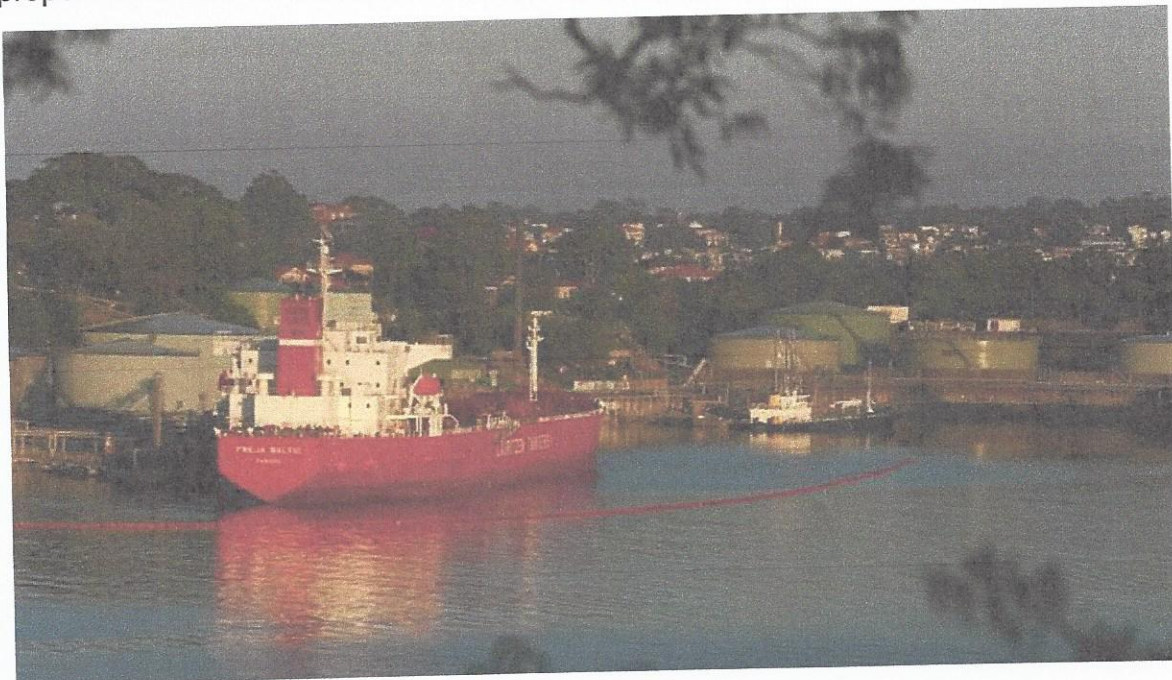
Greenwich Community Association Inc (GCA) is an incorporated association that has represented the Greenwich community for over 71 years. The GCA holds six public meetings a year, distributes a newsletter to at least 1900 households before each meeting and maintains a website accessed by the wider community. In 2014 the GCA established a sub-committee called the Gore Bay Terminal Sub-committee – this sub-committee reports to the GCA in respect of matters related to the operation of the Gore Bay Terminal.

2. Gore Bay Terminal - Location adjacent to residential communities

The Gore Bay Terminal is a petroleum import facility operated by Viva Energy Pty Ltd (Viva) (formerly Shell Australia Pty Ltd).

The terminal is located in Gore Cove adjacent to the residential communities on the Greenwich Peninsula. Residential development is characterised by free standing dwellings, terrace houses and apartments. Greenwich Public School is located 1 km to the North of the berths at the terminal.

The terminal is also in close proximity to residences across the bay in Wollstonecraft. Please refer to the attached photographs that show clearly the location of residential properties relative to the vessels berthed at Gore Bay.





3. Terminal Operations

The terminal is Viva's principal NSW import facility for petroleum products (petrol, diesel, jet fuel and fuel oil) which are distributed through Gore Bay to storage at Gore Bay or via a high pressure pipeline to its Clyde operation.

The terminal operates as a re-fuelling facility for cruise vessels in Sydney Harbour. Fuel oil is stored at Gore Bay and supplied to cruise vessels (normally in Sydney Harbour) by the "Destine" which is berthed at Gore Bay. The "Destine" is chartered by Viva.

The facility operates under EPA Licence 661 on a 24/7 and 365 day a year basis. .

Vessels movements at the terminal currently average two vessels per week with vessels berthed for one or two nights whilst product is pumped into the Clyde pipeline or to storage tanks at Gore Bay.

Pumping occurs day and night.

Greenwich Community Association Inc

Submission Protection of the Environment Operations (Clean Air) Amendment (Cruise Ships) Regulation 2015

10 June 2015

Vessels do not have access to ship to shore power whilst berthed at Gore Bay. Vessels generate the power required to operate pumps and on-board utilities using fuel oil or marine fuel, with the resultant sulphur emissions associated with this continuous operation.

There is at present no mandatory maximum fuel sulphur level in place for this operation other than the level in place under current legislation ie 3.5% sulphur content.

The GCA's efforts over the past three years to engage Sydney Ports and the EPA to mandate a lower regulated maximum sulphur level have been unsuccessful.

4. Health Risks posed by sulphur content of fuel oil affect all who live adjacent to vessels that emit sulphur content fuels.

It is acknowledged by the EPA that:-

"There is growing community concern about shipping emissions and increasing evidence of the health impacts of fine particles from diesel and marine emissions.

The NSW Government is committed to reducing emissions from cruise ships by initiating requirements for the use of low sulphur fuel by cruise ships in NSW ports."

This concern has been further highlighted in the recent Senate Inquiry into Impacts on Health of Air Quality in Australia.

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Completed_inquiries/2010-13/airquality/report/index

The health impacts associated with diesel and marine emissions are just as significant for those who live adjacent to non-cruise vessel port facilities as they are for those adjacent to port facilities for cruise vessels. The risk derives from proximity rather than the nature or function of a vessel. Whilst all vessels are permitted to burn fuel of the same mandated sulphur content, the potential impacts on adjacent communities will be similar.

In the interests of consistency with the objectives of the draft regulations to address the health impacts of fine particles from diesel and marine emissions, it is submitted that the proposed regulations should be amended to include all commercial vessels at berth in Sydney Harbour from 1 October 2015 and all commercial vessels in NSW ports from 1 July 2016.