

Submission Form

MARPOL Annex VI submission,
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| Name or representative: | Fiona Black |
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A handwritten signature in black ink, appearing to read 'F. Black'.

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| Signature: | Date: 10 February 2019 |
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Real Journeys Limited Background info:

In 1954 Les and Olive Hutchins began operating the Manapouri-Doubtful Sound Tourist Company, running four day excursions to and from Doubtful Sound. In 1966 Les and Olive acquired Fiordland Travel Ltd, with its Te Anau Glow-worm Caves and Milford Track Lake Transport operation and began trading as Fiordland Travel Limited. Continued expansion followed with the purchase of the vintage steamship "TSS Earnslaw" in Queenstown in 1969 and with the establishment of cruises in Milford Sound in 1970. In 1974 a launch was relocated to Doubtful Sound and the company commenced operating coaches on the Wilmot Pass enabling Doubtful Sound cruises to re-commence after the completion of the Manapouri Power Station.

Since 2002 Fiordland Travel Ltd has operated all its tourism excursions under the 'Real Journeys' brand and in 2006 changed its company name to Real Journeys Limited. In 2004 Stewart Island Experience was established and the company commenced operating ferry services to Stewart Island. In 2013 Real Journeys launched the Go Orange brand; purchased Cardrona Alpine Resort and the 155 hectare property at Walter Peak which Real Journeys previously leased for over two decades. Then in 2015 Real Journeys purchased the International Antarctic Centre in Christchurch and in 2016 Real Journeys formed a joint venture with Rakiura Maori Trust to deliver Kiwi viewing at Stewart Island and took over 100% ownership of Queenstown Rafting and purchased Kiwi Discovery which are now

operated under the Go Orange brand. The acquisition of Queenstown Rafting included the rafting base and Cavell's Cafe at Arthurs Point, which was remodelled in 2018, with the installation of a micro-brewery, establishing Canyon Food & Brew Co. In 2018 Go Orange expanded purchasing Thunder Jet and Queenstown Water Taxis. Also a new entity, Wayfare, was launched in October 2018 to represent the group's tourism companies - Real Journeys, Cardrona Alpine Resort, Go Orange, the International Antarctic Centre and Canyon Food & Brew Co - in the international market.

Wayfare remains a private, family owned company and is now the largest tourism operator in the region with operational bases in Christchurch, Milford Sound, Te Anau, Manapouri, Queenstown, Wanaka and Stewart Island. The Real Journeys currently operates 24 vessels (20 RJs owned) and employs about 540 staff during the peak summer months and in excess of 1500 staff across the Wayfare group; and 950,000 passengers travelled with Real Journeys in the last 12 months, and 1.5 million across the Group.

Our Submission:

1. Thank you for the opportunity to make submission on the on MARPOL Annex VI: (treaty to reduce air pollution in ports and harbours) discussion paper.
2. All Real Journeys vessels are built in accordance with Maritime New Zealand Rules Part 40A and operate on automotive gas oil (with the exception of the *TSS Earnslaw*) with the sulphur content dictated by the Government regulation for land based fuels (Engine Fuel Specification Regulations 2011).
3. Nevertheless Real Journeys supports New Zealand acceding to MARPOL Annex VI with respect to SOLAS ships. That is MARPOL Annex VI should not be applied to ships constructed under Maritime New Zealand Rules Part 40A already burning automotive gas oil. As any change emission requirements for vessels already operating on automotive gas oil will result in unnecessary additional compliance burden.
4. We are in support of acceding to MARPOL Annex VI as this will lead to reduced emissions of pollutants from shipping around New Zealand and therefore improve air quality.
5. Real Journeys very much encourages the push to the use of clean burning fuels especially with respect to the international cruise ships visiting Fiordland, a UNESCO World Heritage site. We would urge New Zealand to adopt similar measures as ports such as Sydney harbour, to protect the Te Wahipounamu World Heritage Area from unacceptable pollution from shipping. In Sydney, cruise ships capable of accommodating more than 100 passengers are required to limit emissions of Sulphur oxides when entering the inner Sydney harbour, by either using low Sulphur (maximum 0.10% m/m) fuel or an alternative measure that achieves an equivalent outcome.
6. The current impacts of cruise ship exhaust emissions in Fiordland are illustrated by the following photographs taken in Milford Sound on the morning of 21 December 2018. Passengers on deck, on board our overnight vessel the *Milford Mariner* exclaimed about this cruise ships exhaust fumes which also could be smelt at the *Milford Mariner* deck level.

7. These large cruise ships create issues of not only one of air quality but also visual amenity as well, due to the topography in Milford Sound which increases the chances of inversion layers regardless of whether scrubbers are being used or not. This is particularly relevant as the number of cruise ships visiting New Zealand has increased significantly over the past two decades and continues to do so¹.
8. Also some of the cruise ships visiting New Zealand have a dubious environmental track record as pointed out in a Stuff article of October 2018; which noted that six of the cruise ships visiting this summer have been busted for polluting pristine Alaskan sounds in recent months and in 2016, Princess Cruises was fined a record \$40m for deliberately illegally dumping oil-contaminated waste for eight years and trying to cover it up.²



Milford Sound on morning of 21 December 2018

¹ <https://www.mbie.govt.nz/assets/1c8d18774f/cruise-infrastructure.pdf>

² <https://www.stuff.co.nz/business/108063789/cruise-ship-pollution-under-the-spotlight-after-vessels-busted-in-alaska-come-to-nz>