

INDEPENDENT ENVIRONMENTAL AUDIT EDEN CRUISE WHARF OPERATIONS - SSI 7734



FINAL REPORT

Facility Operator:	Port Authority of NSW
Project:	Eden Cruise Wharf – Operation
Scope:	All relevant / triggered conditions of the NSW Infrastructure approval SSI 7734 (including MOD 1 MOD 2 and MOD 3), and relevant requirements of the EPBC Act Referral Decision 2016/7828.
Location(s)	Eden Cruise Wharf – End of Weecoon Street, within Snug Cove, Twofold Bay, Eden
Audit Dates:	Sunday 30 November (site inspection) and 10 December 2025 (closing meeting). Pre-audit meeting 25 November.

Revision no.	Author / Auditor	Purpose / Change	Date
0.1	Julie Dickson	Draft for review/comment	16/12/2026
1.0	Julie Dickson	Final for issue	22/12/2025

CONTENTS

EXECUTIVE SUMMARY	3
Audit Definitions and Abbreviations	5
1.0 INTRODUCTION.....	7
1.1. Requirement for the audit.....	7
1.2. Project Background	7
1.3. Auditor Credentials.....	8
1.4. Audit Objectives, Scope & Criteria	9
1.5. List of Approvals and documents audited / reviewed.....	9
1.6. Period covered by the Audit	10
2.0 AUDIT PROCESS AND METHODOLOGY.....	11
2.1. Selection and Approval of the Auditor	11
2.2. Compliance Findings Ratings – Table 1	12
2.3. Explanation of Finding Classifications – Table 2	12
2.4. Audit Attendees	13
2.5. Audit Disclaimer	13
3.0 AUDIT FINDINGS	14
3.1. Compliance summary – summary of compliance against audit criteria – Table 3.....	14
3.2. Audit findings, actions and recommendations – Table 4	15
3.3. Previous Audit findings follow-up – Table 5	19
3.4. Summary of Environmental Performance	21
3.4.1. Compliance with Infrastructure Approval	21
3.4.1.1. Schedule 1 - MODs 1, 2 and 3.....	21
3.4.1.2. Schedule 2 – Administrative Conditions – Part A	22
3.4.1.3. Schedule 2 – Community Information and Reporting – Part B	22
3.4.1.4. Schedule 2 – Construction Environmental Management – Part C	23
3.4.1.5. Schedule 2 - Operational Environmental Management – Part D	23
3.4.1.6. Schedule 2 – Key Issue Conditions – Part E	24
3.4.2. OEMP Implementation	25
3.4.3. EPBC Act Referral.....	25

3.5.	Complaints	26
3.6.	Incidents	26
3.7.	Adequacy of documentation required under the Approval	26
3.8.	Site Inspection outcomes – including photos	27
4.0	Audit Conclusions.....	30
5.0	Appendix A – Auditors Declaration of Independence.....	33
6.0	Appendix B – Independent Auditor Approval.....	34
7.0	Appendix C – DPHI correspondence – consultation requirements	36
8.0	Appendix D – DPHI correspondence –Extension of Time	37
9.0	Appendix E – Audit Tables	38
9.1.	AUDIT TABLE 1 – Schedule 2 - PART A - Administrative Conditions.....	38
9.2.	AUDIT TABLE 2 – Schedule 2 – PART B – Community Information and Reporting.....	52
9.3.	AUDIT TABLE 3 – Schedule 2 - PART D – Operational Environmental Management	57
9.4.	AUDIT TABLE 4 –Schedule 2 - PART E – Key Issue Conditions.....	76
9.5.	AUDIT TABLE 5 - OEMP Implementation.....	89

EXECUTIVE SUMMARY

An Independent Environmental Audit (IEA) was conducted of the operation of the Eden Cruise Wharf (also referred to as the Eden Cruise Facility or Breakwater wharf extension) in November and December 2025 as required by the State Significant Infrastructure (SSI) Approval SSI-7734. This is the second operational audit of the project.

The objective of this Independent Environmental Audit was to assess the performance of and compliance with the relevant conditions of the SSI Approval at the Port of Eden and to recommend measures or actions to improve performance in accordance with Condition A27. The scope of the audit included all SSI conditions of approval and EPBC referral requirements relevant to the operation of the Eden Cruise Wharf, and the implementation of the approved Operational Environmental Management Plan (OEMP), OEMP Sub-Plans and Monitoring Plans.

Under Condition A24 of the Approval, independent compliance audits were required to be conducted annually, commencing within a year of commencement of construction (2019). The first audit of operations was conducted in December 2022 following the re-opening of the Eden Wharf once COVID-19 restrictions were lifted. Since the last audit, the frequency of the Compliance Audits has been changed to every 3 years following the notification of a non-compliance against Condition A24 by the Port Authority and the subsequent agreement by the Department in August 2024 to alter the frequency in September 2024.

Overall, it was determined that there was a high level of compliance to the conditions of approval, however, three (3) non-compliances, two (2) Observations and one (1) Opportunity for Improvement was raised at this audit (see Table 4 for details).

The non-compliances related to:

- Condition A24 - No environmental compliance audit was undertaken in the calendar year of 2023 (self-reported). Following a request from Port Authority, DPHI agreed to reduce the frequency of Independent Compliance Audits from Annual to Triennial with the next audit to be conducted in 2025 (this audit) and then every three years ongoing.
- Condition D13 (pre-MOD 3): The 2023/2024 Air Quality Operation Monitoring Report was submitted more than one month after the end of the 2023/24 Cruise Ship Season (as required by Pre-Mod 3 Condition D13 and Section 7.1 of the previous (prior to MOD 3) Air Quality Monitoring Program (self-reported).
- Condition D24: The Operational Air Quality Monitoring Report – Quantum class visit (triggered by the arrival of the cruise ship Ovation of the Seas on 22 Feb 2025 per Condition D17 b) was not submitted within the 3 months requirement (self-reported).

It was considered by the auditor that the above non-compliances were administrative in nature, and had minimal, if any material effect on environmental performance of the project.

Two Observations (OBS) and were also raised at this audit. In summary these related to:

- Operational Water Quality Monitoring Program not fully adequate – does not define what constitutes an exceedance and does not address the requirements of Conditions D22 to D25;
- Traffic Management requirement of Condition E7A not known by key personnel (however condition not breached).

One Opportunity for Improvement (OFI) was raised:

- Consideration could be given to fitting non-tonal reversing alarms on the forklift in case out-of-hours activities are required in the future.

Overall, the outcomes of the audit were positive, with the following key strengths recognised:

- ✓ Evidence was readily available both at Head Office (remotely) and at the site;
- ✓ There have been no pollution incidents recorded on the project for operations;
- ✓ The five complaints recorded were actioned in a timely manner and investigated where required;
- ✓ There have been no recorded non-compliant cruise ships reported since commencement of operations;
- ✓ Site inspections are conducted whenever cruise ships come into the port, evidence of action taken when issues arose (e.g. – music playing – was stopped);
- ✓ Traffic and transport relating to the movement of passengers from the cruise ship was appropriate and some improvements made since the last audit;
- ✓ Volunteers on the cruise ship days enhanced the effectiveness of traffic and passenger movements;
- ✓ Evidence was provided to confirm that noise control measures such as “no deck announcements or music from open decks” were well understood and implemented;
- ✓ Induction and environmental related training continue to be provided to ensure staff and contractors are aware of environmental and community requirements;
- ✓ Extensive procedures continue to be in place for emergency response and management of non-cargo oil transfers;

The auditor would like to acknowledge the high level of awareness of the CoA requirements by Port Authority personnel, the pro-active management of the audit process and the timely provision of requested audit evidence. A special thanks to all personnel including contractors involved in the audit for their cooperation and assistance throughout the audit.

Audit Definitions and Abbreviations

Abbreviation / Term	Explanation
BVSC	Bega Valley Shire Council.
CCC	Community Consultative committee (replaced by ESG).
CCS	Community Communication Strategy.
Complaint	A written or verbal expression of dissatisfaction about an activity, or proposed activity, or failure to act by the Operator, Duty Manager Cruise Operations (DMCO) or anyone else directly or indirectly related to the Facility.
Compliance Audit	Has the same meaning as Independent Environmental Audit (IEA).
Council	Bega Valley Shire Council.
DPE	Department of Planning and Environment (formerly Department of Planning, Industry and Environment).
DCCEEW (NSW)	NSW Department of Climate Change, Energy, the Environment and Water
DPIRD	NSW Department of Primary Industries and Regional Development including DPIRD Agriculture, DPIRD Biosecurity and Food Safety, DPIRD Water and DPIRD Fisheries
EIS	The Eden Breakwater Wharf Extension State Significant Infrastructure – Environmental Impact Statement, dated 3 November 2016.
EPBC 2016/7828	Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) Referral Decision dated 13 April 2017.
ESG	Eden Stakeholder Group (replaces the CCC)
Extended Use	Use of the Facility when not occupied by a cruise ship by fishing vessels, tugs, barges, lines, boats, yachts and other vessels with sizes up to 100 metres in length
Facility	Eden Cruise Ship Facility, including all infrastructure required to allow cruise ships to berth at the extended Eden Breakwater Wharf and land side areas, facilities and services for management of passengers' visitation including disembarkation, embarkation and transport. It is also known as the Eden Cruise Wharf.
IEA	Independent Environmental Audit – an independent and objective assessment of the environmental performance and compliance status of a project.
Infrastructure Approval	Infrastructure Approval (SSI) 7734 issued by the Executive Director, Priority Projects Assessment (as delegate of the Minister for Planning) Department of Planning and Environment under Section 115ZB of the Environmental Planning and Assessment Act 1979, (dated 5 July 2017) as modified on 7 November 2018 (Mod 1) and on 21 October 2020 (Mod 2).
LGA	Local Government Area
LOA	Length Overall (of vessel)
MARPOL	MARPOL (short for Marine Pollution) means the International Convention for the Prevention of Pollution from Ships, 1973:
MOD	Modification. MOD 1, MOD 2 and MOD 3 refer to the 3 Modifications made to the SSI 7734 Approval.
Oasis Class (or equivalent)	Cruise ships approximately 370m LOA
MARPOL Annex V1	Regulations for the Prevention of Air Pollution from Ships.
OCR	Operation Compliance Report
OEMP	Operational Environmental Management Plan
Operator	The Port Authority of New South Wales is the Operator for the Facility and responsible for overall compliance with the OEMP, and the

Abbreviation / Term	Explanation
	operational aspects of the Infrastructure Approval Mod 1, Mod 2 and MOD 3 and EPBC Act Referral Decision.
Planning Secretary, the	Secretary of the NSW Department of Planning, Housing and Infrastructure (DPHI)
Port	Port of Eden
POEO Act	Protection of the Environment Operations Act 1997 (NSW)
Port	Port of Eden.
Port Authority	Port Authority of New South Wales.
Quantum Class (or equivalent)	Cruise ships approximately 348m LOA
Relevant Maritime Authority	Harbour Master or authorised officer as defined in the <i>Marine Safety Act</i> 1998, or authorised officer or inspector under the <i>Marine Pollution Act</i> 2012.
RTS	Response to Submissions Report
SECO	Supervisor Eden Cruise Operations
SSI	State Significant Infrastructure.

1.0 INTRODUCTION

1.1. Requirement for the audit

This Independent Environmental / compliance Audit (IEA) is required under Conditions A24 to A27 of the NSW Infrastructure Approval SSI 7734. Condition A24 requires that *“Compliance audits of the SSI must be conducted annually, commencing within a year of the commencement of Construction, by an independent, suitably qualified and experienced expert or within another timeframe agreed with the Planning Secretary”*.

Prior to the operation phase compliance audits, two construction / pre-operation audits were undertaken, the first in August 2018 and the second in July 2019 by Royal HaskoningDNV.

The first operational phase audit was due to be conducted in July 2020, however due to the government ban on cruise ships due to COVID-19 no cruise ships operated from March 2020 until April 2022. The first cruise ship after the ban arrived at the Eden Wharf on 12 July 2022. The first operational independent audit was therefore conducted in December 2022 by DECA Pty Ltd.

On 15 August 2024, Port Authority requested to change the frequency of Annual Independent Compliance Audits based on the performance of the Facility in the first five years of operation. The Department reviewed the request in the context of Modification 3's approval and the Port of Eden Cruise Schedule indicating an absence of equivalent Quantum and Oasis class ship visiting the Port of Eden in the 2024-2025 cruise season.

The Planning Secretary agreed, under Condition A24, to reduce the frequency of Independent Compliance Audits from Annual to Triennial. The Project's next Independent Compliance Audit would therefore be the 2025 Independent Compliance Audit (this audit), and then every three years ongoing.

This second operational IEA (this report) was conducted in November / December 2025 by Julie Dickson of Dickson Environmental Consulting and Audit (DECA) in accordance with the requirements of Conditions A24 to A27.

1.2. Project Background

The Eden Cruise Wharf (also referred to as the Eden Cruise Facility, or the Facility) is located on land within Snug Cove and the bed of Twofold Bay, within the Port of Eden (the Port) on the Sapphire Coast of New South Wales (NSW). The Facility was declared State Significant Infrastructure (SSI) by the Minister for Planning and was constructed by the former New South Wales (NSW) Department of Industry – Crown Lands (DoI). Construction of the Facility was completed in August 2019 and operation commenced in September 2019.

The key approvals for the Operation of the Facility are the State Significant Infrastructure (SSI) Approval No. 7734, Modification 1 (MOD 1) of Infrastructure Approval SSI 7734 dated 7 November 2018, Modification 2 (MOD 2) dated 21 October 2020, Modification 3 (MOD 3) dated 24 May 2024. An EPBC referral decision was made on 13 April 2017 noting that the project is not a controlled action if undertaken in a particular manner under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) Referral Decision 2016/7828.

The Facility comprises the Eden Breakwater Wharf Extension (the extended Wharf, or Eden Cruise Wharf), and all associated infrastructure required to allow cruise ships to berth and land side areas, facilities and services for management of passenger visitation including disembarkation, embarkation and transport.

As per the original Approval, the Eden Cruise Wharf project comprised dredging of the bed of Snug Cove/ Twofold Bay, an extension of the existing Breakwater Wharf by approximately 95m, installation of three mooring dolphins and two berthing dolphins, installation of three mooring bollards on the existing wharf, extension of existing services (lighting, potable water and emergency fire-fighting water), and installation of navigation aids.

MOD 1 allows the operation of the extended wharf for use by up to 60 cruise ships per annum and associated land-based facilities and services for management of passenger visitation including disembarkation, embarkation and transport.

MOD 2 allows any other types of non-cruise vessels up to 100m in length to berth 24 hours/day and carry out operations such as load/unload, refuel, carry out maintenance and servicing, and passengers embarking/disembarking at the Eden Cruise Facility between 7:00am to 10:00 pm.

MOD 3 allows for the visitation of larger cruise ships and other vessels. Key aspects of the modification approval include:

- Increase the size of cruise ships allowed to visit the Eden Cruise Wharf up to a maximum length of approximately 370m;
- Allow all ships to remain at berth 24 hours per day. Vessels at berth are still subject to the Eden Cruise Wharf activity operating hours;
- Allow an unrestricted number of cruise ship visits to the Eden Cruise Wharf;
- Construct a mooring dolphin approximately 60m seaward of the existing mooring dolphins;
- Construct a catwalk extension to the existing Eden Cruise Wharf to allow cruise ships to use an additional passenger embarkation/disembarkation door.

The mooring dolphin and catwalk extension is not yet required for ongoing operation and construction had not yet commenced. The construction of this infrastructure would be required to accommodate the berthing of an Oasis or equivalent size cruise ship in the future.

An Operational Environmental Management Plan (OEMP) has been in place since commencement of operations and was reviewed, revised and updated in September 2024 to reflect the requirements of MOD 3. Various Sub-Plans were also prepared originally and were updated in 2024 including the Air Quality, Noise Management, Traffic Transport and Access Management and Water Quality Management sub-plans as appendices of the OEMP. These plans are available on the Port Authority Eden Cruise Wharf website.

An Extended Use OEMP was required as part of MOD 2, however this requirement has been removed with the approval of MOD 3, and all operational requirements are now contained within the current OEMP and sub-plans.

The operation of the Facility, including the implementation of the Cruise Ship OEMP is the responsibility of the Port Authority of NSW (Port Authority).

1.3. Auditor Credentials

Audit Organisation:	Dickson Environmental Consulting and Audit Pty Ltd
Auditor & Report Author:	Julie Dickson
Auditor Qualification:	Exemplar Global Lead / Master Environmental Auditor Accreditation no. 13573 (exp June 2026)
Affiliations:	EIANZ Certified Environmental Practitioner, Reg. no. 221

1.4. Audit Objectives, Scope & Criteria

The objective of this Independent Environmental Audit was to assess compliance with the conditions of approval for the operation of the Eden Cruise Wharf in accordance with Conditions A24 to A27 of the Infrastructure Approval SSI 7734 and the operational components of the EPBC Act Referral Decision 2016/7828. Condition A27 requires that the audit report must:

- (a) assess the environmental performance of the SSI, and its effects on the surrounding environment;
- (b) assess whether the project is complying with the terms of this approval;
- (c) review the adequacy of any document required under this approval; and
- (d) recommend measures or actions to improve the environmental performance of the SSI, and improvements to any document required under this approval.

The audit scope and criteria therefore included:

- Site Inspection of the Eden Cruise Wharf including review of implementation of commitments made in the project OEMP and related Sub-Plans to assess its effects on the surrounding environment;
- Assessment as to whether the project is complying with all relevant / triggered conditions of the NSW Infrastructure Approval SSI 7734;
- Assessment of documents required under the approval to determine their adequacy for the operation of Eden Cruise Wharf; and
- Assessment as to whether the project is complying with relevant / triggered “measures” of the EPBC Act Referral Decision 2016/7828. (Note -only one operational “measure” is triggered).

Recommended measures and actions to improve the environmental performance of the SSI and improvement to documents required under the approval are included in Table 4 of this report - Audit Findings, actions and recommendations.

The assessment against the full NSW conditions of approval and OEMP audit criteria are reflected within the Audit Tables in Appendix E of this report. The measure from the EPBC Act Referral decision is addressed in section 3.4.3 of this report.

1.5. List of Approvals and documents audited / reviewed

- Infrastructure Consolidated Approval SSI 7734 dated 15 February 2015 (incorporating Modification 1 – approved 7 November 2019, Modification 2 – Approved 21 October 2020) and Modification 3 – Approved 24 May 2024;
- EPBC Act Referral Decision 2016/7828 (not a controlled action if undertaken in a particular manner) dated 13 April 2017;
- Eden Cruise Ship Facility Operational Environmental Management Plan (OEMP) by Port Authority of NSW dated September 2024;
- Traffic Transport and Access OEMP Sub-Plan, Eden Cruise Wharf, September 2024 by Port Authority of NSW, September 2024;
- Noise Management Sub-Plan – Eden Cruise Wharf September 2024 by Port Authority of NSW,
- Air Quality Management Sub-Plan – Eden Cruise Wharf, September 2024 (no Rev No) by Port Authority of NSW;
- Operational Air Quality Monitoring Program Eden Cruise Wharf July 2024 by Port Authority of NSW;
- Port of Eden Air Quality Monitoring Program Air Quality Monitoring Final Report (GHD for Port Authority) 29 October 2025 covering monitoring period 2024/2025 to 28 May 2025;
- Water Quality Management Sub-Plan – Eden cruise Wharf – September 2024 by Port Authority of NSW;
- Water Quality Management Sub-Plan – Eden cruise Wharf – October 2025 Rev 3 by Port Authority of NSW;

- Operational Water Quality Monitoring Program - Eden Cruise Wharf Modification 3 to SSI 7734 2 July 2024 Rev 0
- Operational Water Quality Monitoring Program - Eden Cruise Wharf Modification 3 to SSI 7734 Rev 2 dated 23 September 2025 (Worley Consulting);
- Operational Water Quality Monitoring Report -Quantum Class Visit Rev 0 (Worley Consulting) dated 19 May 2025.
- Harbour Master Instructions Berthing Requirements Eden May 2025
- Operational Compliance Tracking Program (PDF of the live spreadsheet where compliance against Conditions of Approval are tracked);
- Eden Cruise Ship Facility Operation Compliance Report 2022-2023 Cruise Season and Extended Use - Port Authority - June 2024;
- Eden Cruise Ship Facility 5 year Operations Compliance Summary Report 2023/2024 Cruise Season and Extended Use - Port Authority Feb 2025;
- Eden Cruise Ship Facility Operation Compliance Report 2024/2025 Cruise Season - Port Authority 18 November 2025.

Other documents, records, and correspondence sighted and reviewed to verify compliance are included in Appendix E - Audit Tables

1.6. Period covered by the Audit

This is the second operational audit of compliance against the NSW Infrastructure Approval SSI 7734. The audit period is three years, from 4 December 2022 (date of previous audit) to 30 November 2025 (commencement of site inspection / audit). A pre-audit evidence gathering meeting was held online on 25 November 2025, and further review of evidence was undertaken later in the month of December 2025.

2.0 AUDIT PROCESS AND METHODOLOGY

This IEA was conducted as the second operational audit of the of the Eden Wharf Cruise Facility in accordance with Schedule 2, Conditions A24 to A27 of the SSI 7734 Approval and is generally aligned with the DPIE Post Approval Requirements, May 2020. Due to the timing of the Approval (pre-2018), the consultation requirements were not required to be implemented as agreed by the Department of Planning, Housing and Infrastructure (DPHI) (see Appendix C - DPHI correspondence – consultation requirements).

Audit Tables were reviewed, revised and updated from the 2022 Audit Tables to include the MOD 3 changes to the conditions of approval. The additional requirements of the OEMP, OEMP Sub-Plans and Monitoring Programs were also included in the revised Audit Tables.

A site inspection / site visit checklist was updated to reflect any changes to requirements since the last audit, and was used as a guide during the site inspection.

The audit was conducted both on-site (site inspection and interviews with key management and operational personnel) and off-site via Microsoft Teams. Refer to audit attendee list in Section 2.4 of this report.

Post-audit activities included communications with the auditees for the provision of additional audit evidence as required, provision of a draft report, and consideration of comments by the Port Authority following the issue of the draft report for completion of the final audit report.

The audit was conducted in accordance with the AS / NZS / ISO 19011:2018 – Guidelines for Auditing Management Systems.

2.1. Selection and Approval of the Auditor

Condition A24 of the Approval requires that the compliance audits of the SSI must be conducted “...by an independent, suitably qualified and experienced expert or within another timeframe agreed with the Planning Secretary”. The auditor (Julie Dickson) is independent of the Port Authority of NSW and the project, and has certified this in the Auditor’s Declaration of Independence in Appendix A of this report. Julie is a certified Lead / Master Environmental Auditor with Exemplar Global. A Master Auditor is defined as a Lead Auditor who has been continuously certified for more than 12 years.

Condition A25 requires that “Details of the nominated independent auditor must be submitted to the Planning Secretary for approval no later than one month prior to the audit being undertaken”. The auditor was nominated in a letter from the Port Authority to DPHI on 29 October 2025, and the audit formally commenced with the site inspection on 30 November 2025, which is within the one-month requirement.

The selection of the auditor was approved in a letter by DPHI dated 4 November 2025 (refer to Appendix B – Independent Auditor Approval).

2.2. Compliance Findings Ratings – Table 1

Table 1: Compliance findings rating (as per DPIE Independent Audit Post Approval Requirements)

Status	Description
Compliant	A rating of “compliant” is given when the auditee has complied with a condition, element of a condition, or measure required by a management plan, report or program etc.
Non-compliant	A rating of “non-compliant” is given when the auditee has not met a condition, element of a condition or measure required by a management plan, report or program etc.
Not Triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a past or future requirement), therefore an assessment of compliance is not relevant).

* Note: where Port Authority were unable to provide sufficient verifiable evidence to fully demonstrate compliance or non-compliance, a determination was made by the auditor based on available information. Limitations on completeness of evidence are documented in the Audit Tables

2.3. Explanation of Finding Classifications – Table 2

Table 2 – Audit Findings classifications (within “compliant” status descriptors)

Status	Explanation
Observation (OBS)	Documented requirement and/or implementation issue which may not strictly affect required performance or compliance outcomes. Also termed a non-conformance (as opposed to non-compliance) in the industry, observations could be an early indication of potential non-compliance and/or an adverse performance outcome.
Opportunity for Improvement (OFI)	A suggestion or opportunity to implement a good or better practice to improve effectiveness, further reduce exposure to risk or improve information management. When specifically stated as a Recommendation, a formal response and action plan are required.

2.4. Audit Attendees

NAME	POSITION	LOCATION
Francisca Alvarez	Environmental Planning Officer – Port Authority of NSW	Online – Teams
Paul Webster	Port of Eden Harbour Master	Online – Teams
Peter Lipman	Manager, Regional Cruise Port Authority of NSW	Online – Teams
Larissa Shashkof	Senior Community & Stakeholder Engagement Advisor	Online – Teams
Lana Wills	Supervisor Eden Cruise Operations Port Authority of NSW	Eden Welcome Centre and Cruise Wharf
Jo Clark	Acting Harbour Master / ship's pilot	Eden Welcome Centre and Cruise Wharf

2.5. Audit Disclaimer

This report is based on the scope provided by Port Authority of NSW and the conditions of approval and does not assert to be a definitive confirmation of compliance or otherwise to all Conditions of Approval or conformance obligations contained within the Project documents. The audit was conducted on a sampling basis in accordance with the principles of ISO 19011:2018. Whilst all due care, diligence and professional judgment were exercised, it cannot be guaranteed that all areas of non-compliance, or non-conformance have been detected or identified.

3.0 AUDIT FINDINGS

3.1. Compliance summary – summary of compliance against audit criteria – Table 3

Table 3 – Summary of compliance against audit criteria

Assessment Area	Key Criteria	No. of compliant conditions / items	STATUS		
			Compliant		Non-Compliant
			OFI	OBS	NC
Part A – Administrative Conditions (A1-A40)	General, Compliance Tracking and Reports, Compliance Auditing, Complaints, Incidents	24			1
Part B – Community Information and Reporting (B1-B6)	Community Consultative Committee, Community Communication Strategy, Provision of Electronic Information	14			
Part D – Operational Environmental Management (D1-D25)	OEMPs for cruise and extended use, OEMP sub-plans, Operational Air Quality Monitoring,	19			2
Part E – Key Issue Conditions (E1 – E27)	Operational hours, Traffic Transport and Access, Noise, Air Quality, Lighting	22		1	
EPBC Referral 2016 / 7828	Cruise ship speed	1			
OEMP and Sub-Plan implementation	OEMP and sub-plan implementation – Cruise ships	23	1		
Document management	Adequacy of documents (Water Quality Management Sub-Plan)	1		1	
TOTALS		104	1	2	3

* **Note 1:** Conditions that are not triggered are not included in the count of conditions.

* **Note 2:** Some conditions have multiple elements that require full review (e.g., part a), b) c) etc). These separate requirements are included in the count and are reflected in the compliance status column.

3.2. Audit findings, actions and recommendations – Table 4

Table 4 – Independent Audit Findings, actions and recommendations

No	Cond / reqt Ref	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding rating (NC, OBS/ OFI)	Compliance Status
1.	A24	Compliance audits of the SSI must be conducted annually, commencing within a year of the commencement of Construction, by an independent, suitably qualified and experienced expert or within another timeframe agreed with the Planning Secretary	<p>No independent environmental audit was undertaken in the 2023 calendar year (self-reported as non-compliance in the 2023/2024 Operation Compliance Report).</p> <p>This is a historic non-compliance that was resolved with DPHI during the 2022–2025 audit period.</p> <p>Actions were addressed in August / September 2024. Following a request from Port Authority, DPHI agreed to reduce the frequency of Independent Compliance Audits from Annual to Triennial with the Project's next Independent Compliance Audit being the 2025 Independent Compliance Audit, and then every three years ongoing.</p>	<p>No further action required. The next Independent Compliance audit is due in November 2028.</p> <p>This Independent Compliance Audit was conducted within 3 years of the previous audit, which is "<i>within another timeframe agreed with the Planning Secretary</i>".</p>	NC 1	<p>Non-compliant</p> <p>Closed</p>
2.	D13 (Pre-Mod 3)	Pre-MOD 3 Cond D13: The results of the Air Quality Operation Monitoring Program must be submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of an Operation Monitoring Report at the frequency	The 2023/2024 Air Quality Operation Monitoring Report was submitted more than one month after the end of the 2023/24 Cruise Ship Season (being 28 March 2024) as required by Pre-Mod 3 Condition D13 and Section 7.1 of the previous (prior to MOD 3) Air Quality Monitoring Program.	This was a timing-based non-compliance; therefore, no specific actions are required.	NC 2	<p>Non-Compliant</p> <p>Closed</p>

No	Cond / reqt Ref	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding rating (NC, OBS/ OFI)	Compliance Status
		identified in the relevant Operation Monitoring Program.	<p>This was noted in the Five-Year Operation Compliance Summary Report (OCSR) 2023/2024 Cruise Season and Extended Use - February 2025 (self-reported).</p> <p>Section 7.1 stated that the Operation Monitoring Report “will be prepared and submitted... to the Secretary one month after the end of each Cruise Ship Season for the duration of monitoring”.</p>			
3.	D24	An Operational Monitoring Report(s) must be submitted to the Planning Secretary upon request, and to the relevant authorities and Council (listed in Condition D16 and D19) <u>within 3 months of the monitoring being completed</u> for each event identified within the Operational Monitoring Program.	<p><u>D24 (new MOD 3 Condition).</u> The Operational Air Quality Monitoring Report – Quantum class visit (triggered by the arrival of Ovation of the Seas on 22 Feb 2025 per Condition D17 b) was not submitted within the 3 months requirement. The report was finalised on 29 October 2025 and provided to BVSC on 4 November 2025.</p> <p>The submission of the report was <u>approximately 5 months from the end of the monitoring period</u>. The late submission was self-reported in the 2024/2025 Operational Compliance Report.</p>	This was a timing-based non-compliance; therefore, no specific actions are required.	NC 3	Non-compliant Closed

No	Cond / reqt Ref	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding rating (NC, OBS/ OFI)	Compliance Status
4.	D22-D25 (re: A27 (c) - WQ Sub Plan)	If an exceedance of the environmental parameters identified in the Operational Water Quality Monitoring Program occurs, the Proponent must notify the Planning Secretary and DPI Fisheries as soon as possible and within 24 hours of the identification of the exceedance.	<p>Whilst the Operational Compliance Reports note that there have been no exceedances, the Water Quality Monitoring Program and Water Quality Management Sub-Plan do not adequately define what constitutes an exceedance.</p> <p>The WQ Monitoring Program does not explicitly mention conditions 'D22' & 'D23' but states the requirements of these conditions in section 4.10. Conditions D22 & D23 relate to notification of exceedances.</p> <p>The WQ Monitoring Program does not mention Conditions 'D24' & 'D25'. Condition D24 relates to the submission of Operational Monitoring Reports and Condition D25 relates to actions to be taken should an Operational Monitoring Report identify an exceedance of parameters that cannot be initially mitigated.</p>	<p>Agreed Action</p> <ul style="list-style-type: none"> Consult with authors of the Water Quality Monitoring program and reports (Worley) to clarify what would trigger an exceedance and specific actions required to address the requirements of Conditions D22 to D25 regarding what actions are required should an exceedance occur. Once clarified, update the Water Quality Management Sub-Plan to reflect the requirements of Conditions D22 to D25, <p>Date Due: March 2026</p>	OBS 1	Compliant OBS
5.	E7A	Shuttle buses servicing Quantum and Oasis class (or equivalent) vessels must not use the Barclay Street/Princes Highway intersection, unless agreed to by the road authority.	Whilst this requirement was included in the Traffic, Transport and Access OEMP Sub-plan, key Port Authority staff members, transport coordination volunteers and bus company personnel were not aware of this requirement.	<p>Completed Action</p> <ul style="list-style-type: none"> Key Port Authority Staff and transport coordination volunteers were informally made aware of the requirement during the site inspection / interviews. 	OBS 2	Compliant OBS

No	Cond / reqt Ref	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding rating (NC, OBS/ OFI)	Compliance Status
			It is noted that Sapphire Coast Buslines (coach line used for cruise ships in Eden) confirmed that Barclay Street / Princes Highway intersection has not been used to date when the Quantum class vessels have visited.	<p>Agreed Action</p> <ul style="list-style-type: none"> Update the Eden Induction to state explicitly which bus route can be followed when a Quantum class vessel is visiting <p>Due date: By end October 2026 (next Quantum Class visit is due 22/11/2026)</p>		
6.	E2 OEMP Section 7.4	<p>In addition to the performance outcomes.... all reasonably practicable measures must be implemented to minimise noise impacts and the emission of air pollutants during Operation of the SSI</p> <p>Non-tonal or broadband reversing alarms, or 'quackers', will be used on mobile equipment at the berth as required during non-day period out of hours activities.</p>	It was noted that the forklift used to assist in securing docking ropes had beepers for reversing.	<p>Recommendation</p> <p>Though the usage of the forklift with beepers was during normal operational hours, consideration should be given to fitting non-tonal "quackers" to meet the intent of Condition E2.</p> <p>This would allow the forklift operators to use the same forklift should any non-day / out of hours activities be required in future and further minimise noise during working hours.</p> <p>Due Date: Prior to next cruise season</p>	OFI 1	Compliant OFI

3.3. Previous Audit findings follow-up – Table 5

Table 5 – Previous audit findings follow-up

No	Cond / reqt Ref	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding rating (NC, OBS/ OFI)	Follow-up notes	Status
7.	Cond B6 (e)	<i>A website providing information in relation to the SSI must be established prior to commencement of Construction and maintained for the duration of Construction and Operation. Up-to-date information (excluding confidential commercial information) must be published and maintained on the website or dedicated pages including:</i> (e) a current copy of each document required under the terms of this approval and any endorsements, approvals or requirements from the ER and Planning Secretary, all of which must be published prior to the commencement of any works to which they relate or prior to their implementation as the case may be;	The Community Communication Strategy (CCS) had not been uploaded to the project website	Upload a copy of the Community Communication Strategy to the project website	NC	CCS was on the website. Correspondence from Port Authority to Planning dated 17 Feb 2023 provided evidence that the CCS was updated and to be uploaded to website following Planning approval in April 2023.	Closed
8.	Cond B6 (a & f)	(a) information on the current implementation status of the SSI	It was noted that the Eden Cruise Website still states that “ <i>at this point in time it is not known when operations will re-commence</i> ” under the heading Previous Modification of Project – Approved	Update the project website to reflect that cruise ships are now operating;	OBS	Website has been updated.	Closed

No	Cond / reqt Ref	Requirement	Audit Finding	Agreed Actions / Recommendations	Finding rating (NC, OBS/ OFI)	Follow-up notes	Status
9.	Documents General	Condition A27(c) requires a review the adequacy of any document required under this approval.	<p>Whilst the OEMP and related documents were generally assessed as adequate, the following Operation Compliance Reports (OCRs) did not include date issued:</p> <ul style="list-style-type: none"> - Eden Cruise Ship Facility Operation Compliance Report 2019/2020; - Eden Cruise Ship Facility Operation Compliance Report 2020/2021; - Eden Cruise Ship Facility Operation Compliance Report 2021/2022. 	<p>Recommendation: Ensure that all future OCRs include dates issued.</p>	OFI	OCRs included dates issued	Closed

3.4. Summary of Environmental Performance

Overall, it was determined that there was a high level of compliance to the conditions of approval, however, three (3) non-compliances were raised. All the non-compliances were self-reported in the Operational Compliance Reports, and the auditor considered that the non-compliances were technical in nature (primarily relating to timing) and had minimal material effect on the environmental performance of the project.

In addition, two Observations and one Opportunity for Improvement were also raised, and again, it is considered that these had no material effect on the environmental performance of the project (refer to Table 4 – Audit findings, actions and recommendations).

3.4.1. Compliance with Infrastructure Approval

3.4.1.1. Schedule 1 - MODs 1, 2 and 3

MOD 1 allows the operation of up to sixty (60) cruise ships to visit the Port of Eden per annum. At the time of the audit, the maximum number of cruise ships that had visited and used the Facility in a cruise season was thirty seven (37) in the 2023/2024 cruise season. It is not expected that more than thirty (30) cruise ships will visit in the 2025/2026 cruise season. It should be noted that the infrastructure has not yet been built to accommodate vessels up to 370m long (Oasis vessels). Currently, Quantum class or equivalent vessels (up to 348m long) can visit the Port of Eden subject to environmental parameters being met.

MOD 2 allows any other types of non-cruise vessels up to 100m in length to load/unload, refuel, carry out maintenance and servicing, and passengers embarking/disembarking at the Eden Cruise Facility. It was advised that only vessels up to 100m in length have been allowed to undertake these activities at the wharf, unless allowed under a separate approval (refer to Audit Table 1).

MOD 3 allows 24-hour berthing and vessels up to 370m long, removes the 60-vessel yearly limit for cruise ships (subject to environmental parameters being met), and allows for construction of an extra marine dolphin and permanent passenger walkway. As noted under MOD 1, the 60 cruise ship limit has not been reached.

The OCRs include details of the number of vessels that visited the Facility, confirming that the threshold has not been reached. Interviews with Port Authority management suggests that the threshold of 60 cruise ships or the visitation of an Oasis class ship may not occur for several years.

Based on the above, the project has generally complied with the requirements of MOD 1, MOD 2 and MOD 3.

Note: For clarity, the changed conditions and new conditions introduced by MOD 3 are presented in the Audit Tables in red text. Where an old Condition has been replaced by a new MOD 3 Condition, the old condition is represented in the Audit Tables in ~~strikethrough~~ text.

3.4.1.2. Schedule 2 – Administrative Conditions – Part A

One non-compliance was identified in relation to Administrative Conditions against Condition A24. No Independent Environmental Audit was undertaken in the 2023.

Port Authority wrote to the Department, DPHI on 13 August 2024 providing notification of the non-compliance and requested to alter the frequency of Annual Independent Compliance Audits. DPHI, in a letter dated 17 September 2024, agreed to reduce the frequency of Independent Compliance Audits from Annual to Triennial, with the Project's next Independent Compliance Audit being the 2025 Independent Compliance Audit, and then every three years ongoing. Whilst the revised frequency has now been resolved and changed to triennial, this is recorded as a non-compliance during this audit period.

One Observation has been raised regarding the adequacy of documentation. Whilst the Operational Compliance Reports note that there have been no exceedances, the Water Quality Monitoring Program and Water Quality Management Sub-Plan do not adequately define what constitutes an exceedance. It is recommended that the Water Quality Management Sub-Plan is revised and updated to adequately define an exceedance and define what actions are required to be taken should an exceedance occur.

Audit Table 1 includes the detailed assessment against criteria. Overall, the operation of the Eden Cruise Wharf has been undertaken in compliance with the EIS, Response to Submissions, the Modifications Assessments, the 2023 Environmental Assessment Report and the 2024 Submissions report as per Condition A1. The Compliance Tracking programs have been appropriately implemented through the preparation and submission of Operation Compliance Reports (OCRs) to DPIE, and no environmental incidents have been reported since the commencement of operations. Six (6) complaints were received since the last audit, and these were appropriately managed (refer to Complaints section).

The management of complaints is detailed within Audit Table 1, and complaints management is addressed separately in Section 3.5 of this report.

3.4.1.3. Schedule 2 – Community Information and Reporting – Part B

Overall, community consultation, provision of information and reporting was found to be effective. Audit Table 2 includes the detailed assessment against criteria – no non-compliances or other findings were raised regarding community information and reporting.

An Eden Cruise Ship Facility Five-Year Community Consultative Committee Report December 2024 was prepared as per the requirements of Condition B2. Among other things, the report discussed a recommendation for continuation or disbandment of the CCC as allowable under Condition B2, provided it is replaced with a community-based forum. At the December 2024 meeting, the Eden CCC:

- endorsed the Draft Five Year Eden CCC Compliance Report,
- agreed to disbandment of the Eden CCC, and
- supported the formation of the new Eden Stakeholder Group and the Terms of Reference for that group (with updates as documented in the December 2024 meeting minutes).

Section 4 of the Five-Year report noted that the report will be submitted to the Secretary for consideration.

The December 2024 minutes noted that the Five-year summary report must be endorsed by members, and that once endorsed, the final report will be submitted to the Planning Secretary. Evidence was provided that the Five-Year report was submitted to the Planning Secretary on 19 December 2024. The minutes also noted that "council endorses the Draft Five Year CCC

Compliance Report and supports the formation of the new Eden Stakeholder Group which will provide greater coordination and communication amongst agencies."

The Community Communication Strategy (CCS) was revised in November 2025 and notes that In January 2025, the CCC was disbanded and replaced with the Port of Eden Stakeholder Group (ESG) and Terms of Reference have been adopted for that group. The CCS meets the requirements of Condition B5.

A website was established prior to construction by the Department of Industry, and since the responsibility for the operation of the Eden Cruise Wharf was transferred to the Port Authority of NSW, additional operational project documents have been provided on the Eden Cruise Wharf website and is now managed by the Port Authority.

A review of the Port Authority website was undertaken as part of this audit, and it was found that all the documents required by Condition B6 were either directly uploaded to the website or were available via a link to the NSW Planning Major Projects planning portal as required by Condition B6.

3.4.1.4. Schedule 2 – Construction Environmental Management – Part C

Part C of the SSI Approval – Construction Environmental Management, is not relevant to this audit and has been excluded from the scope.

3.4.1.5. Schedule 2 - Operational Environmental Management – Part D

Two non-compliances were raised regarding Operational Environmental Management, both of which related to the timing of the submission of monitoring data to the Planning Secretary (Pre-MOD 3 Condition D13 and Condition D24). Refer to Table 4 – Audit findings, actions and recommendations for further detail.

One Observation was raised under the "D" Conditions (D22), which related to the adequacy of the Operational Water Quality Monitoring Program in defining what constitutes an exceedance. Refer to Table 4 – Audit findings, actions and recommendations for further detail.

Since the last audit, the OEMP and related Sub-Plans have been revised and updated to reflect the requirements of MOD 3 and the findings of the Five Yearly Operational Compliance Summary Report as required by Condition D5.

MOD 3 introduced various changes to the "D" Conditions including changes to D8 (previously addressed the requirements of the Air Quality Monitoring Program) which relate to the requirement to submit the results of the Air Monitoring Program in an Operation Monitoring Report. The new Condition D8 requirements are the same as the Pre-MOD 3 Condition D13. New Condition D13 relates to the requirement for the Operational Monitoring Program to be submitted to Planning for approval prior to the first cruise season in which monitoring will occur.

MOD 3 also included twelve (12) new conditions (D14 to D25) relating to Air Quality and Water Quality Monitoring requirements under various scenarios regarding number of vessel visits and visits of Oasis and Quantum Class cruise ships to the Port of Eden. Overall, the air and water monitoring programs were satisfactorily implemented (where triggered) except in regard to the timing of submission of reports to the Department (see two non-compliances referred to above).

Appropriate consultation with the relevant authorities was undertaken, and feedback obtained was considered and incorporated into the relevant OEMP, sub-plans and other documents. As a positive observation, it was noted that DPIRD comments on the Water Quality monitoring results

were incorporated into the Harbour Master's Instructions (berthing requirements) relating to the minimisation of the use of thrusters to reduce sediment disturbance.

Some of the monitoring was not triggered as the threshold for maximum number of cruise ships visiting Eden (<60) has not yet been met, and there have been no visits of an Oasis Class cruise to date.

Audit Table 3 includes the detailed assessment against criteria.

3.4.1.6. Schedule 2 – Key Issue Conditions – Part E

No non-compliances were raised in regard to the Key Issue Conditions. One Observation was raised against Condition 7A, which requires that shuttle buses servicing Quantum class vessels (Anthem of the Seas is classified as Quantum class) do not use the Barclay Street / Princes Hwy intersection. Whilst it appears that this intersection has not been used for Quantum class vessels, staff were not aware of the requirement.

The majority of the key issue conditions were assessed and verified through the site inspection and interview process on site and are addressed in detail in Audit Table 4.

Noise and air emissions:

The site inspection on the day of the arrival of the Anthem of the Seas (Quantum Class cruise ship) did not identify any significant issues relating to noise and there was no excessive smoke from the stack at the time of arrival, while stationary or when departing. One deck announcement was made during the site visit, and it was determined that it was for a safety drill. It was also noted during the site inspection that beepers (as opposed to non-tonal alarms or "quackers") were being used during approved operational hours. Though the usage of the forklift with beepers was during normal operational hours, it was recommended that fitting non-tonal "quackers" to minimise noise emissions be considered to meet the intent of Condition E2 (implement all practical measures to minimise noise impacts). Six (6) noise complaints were made over the audit period – refer to complaints section.

MOD 3 included new Conditions relating to noise (Conditions 8A, 8B, 8C and 8D) relating to the preparation of a Cruise Noise Mitigation Plan and undertake associated monitoring. These conditions were not triggered at this audit. Refer to Audit Table 4 for details.

The site inspection, interviews and reviews of inspection checklists and other documentation verified that the majority of noise and air quality mitigation measures identified in the Noise and Air Quality Management OEMP Sub-Plans had been appropriately implemented. It should be noted however, that not all requirements could be fully verified (such as that the ships engine, generator, exhaust and ventilation systems were adequately maintained or met MARPOL emissions requirements) as it was not possible or practicable to undertake an on-board inspection of the ship's systems. The site inspection did not identify any issues relating to excessive noise or emissions of dark smoke.

Traffic, Transport and Access:

The Traffic Transport and Access Management Plan was updated by the Port Authority to incorporate the requirements of MOD 3, which allows the use of the wharf by cruise and non-cruise ships up to 370 in length. The site visit verified appropriate implementation of the requirements including provision of passenger transport services, bus parking bays, waiting areas, personnel to oversee pedestrian movements, and safe pedestrian access to the town centre. It was noted that some improvements have been made to the control of the movement of

passengers through the temporary erection of additional bunting and barriers to direct passengers away from moving buses and other operational areas.

Lighting:

As noted at the previous audit, the lighting at the wharf appeared to be appropriately installed to minimise impacts on residences due to the 90 degrees downward facing angle, however it could not be verified that the lighting was designed to the relevant standards.

Social (new category and Conditions):

MOD 3 included four (4) new conditions – (E24 to E27) relating to the preparation of a Social Impact Management Plan (SIMP) prior to the commencement of the first cruise season with more than 60 cruise ship visits is expected to occur. These conditions have not yet been triggered as Oasis class cruise ships cannot berth at Eden Cruise Wharf until further wharf extension works have been completed. It was advised that it may be several years before an Oasis class ship can / will visit.

3.4.2. OEMP Implementation

Audit Table 5 was prepared to include the specific requirements contained within the OEMP and OEMP Sub-Plans, which were not specifically addressed in the conditions of approval. No non-compliances were raised in regard to the implementation of the OEMP, or OEMP Sub-plans.

Good evidence was provided of environmental induction and training, and appropriate processes continued to in place to manage the prevention of emergencies through ship refuelling and other operational procedures, and response to spills and pollution incidents through various incident and emergency response procedures.

A daily (cruise day) inspection checklist continues to be used on all cruise days to ensure the areas of water and sediment quality, aquatic and terrestrial ecology, noise, air quality, traffic, transport and access, waste, and visual impacts are checked and where required, addressed. The auditor accompanied the SECO on the cruise day inspection – no issues of concern were identified.

It was advised that periodic inspections of the seabed are undertaken by the Port Authority, and accumulated rubbish and marine debris would be removed as required.

The site inspection undertaken by the auditor confirmed that the implementation of the requirements of the OEMPs and Sub-plans was adequate and appropriate.

3.4.3. EPBC Act Referral

The EPBC Referral 2016/7828 sets out the referral decision – not a controlled action if taken in a particular manner. The “manner in which the proposed actions must be taken” related primarily to construction phase activities such as piling, re-strike testing.

The majority of the requirements related to the construction phase, however one action relating to operations is the requirement for *“All cruise ships arriving at and departing from the Eden Breakwater wharf must be aware of the potential presence of whales and maintain a suitable speed within the Port of Eden limits to avoid collisions with whales”*

A Suitable Speed is defined as “10 knots or less, except in circumstances where the Port Harbour Master (or their Delegate) or a Pilot considers that a higher speed is necessary to maintain safe navigation in the Port. The Harbour Master and pilot escort cruise ships into the harbour and enforce the limit – there have been no reports of excess speed in the port.

The daily (cruise days) inspection checklist includes the question “Is the ship approaching at a suitable speed of 10 knots or less...’). The speed limit is included in both OEMPs.

Port of Passage Plans provide the maximum speed allowable (8 knots) in the outer port area, progressively reducing to 4 knots closer to the wharf - on the day of the audit, the plan showed that the maximum speed within the port was 8 knots, reduced to around 4 knots near the wharf, and this is typical.

Based on the above, the operation of the Eden Cruise Wharf is compliant with the requirements of the EPBC Act referral decision.

3.5. Complaints

A complaints process continues to be implemented by the Port Authority through the electronic Consultation Manager platform. Consultation Manager can be filtered to show complaints for any particular site managed by The Port Authority.

An interview was held with the Port Authority's Senior Community & Stakeholder Engagement Advisor, and the process for resolution of complaints was discussed and demonstrated. Complaints are directed to the call centre and are forwarded immediately to Eden SECO / management for immediate action wherever possible.

Six (6) complaints were received over the audit period. In summary, no complaints were received in the 2022/2023 cruise season, one complaint was received in the 2023/2024 period, and five complaints were received in the 2024/2025 period. All complaints related to noise.

The 2023/2024 and 5 year Operational Compliance Summary Report (OCSR) provided the history of complaints from 2019 to 2024, noting no complaints in the first 4 reporting periods, and one complaint in the 2023/2024 period. Action taken was documented. The complaints register was reviewed by the auditor and found that the complaints appeared to be appropriately investigated and actioned in a timely manner.

Strategies for reducing the recurrence of complaints was detailed in Section 4 of the OCSR: "As a result of the complaints Port Authority has streamlined the complaints process to ensure our cruise operations team on the ground are notified directly when we receive a complaint in Eden".

For further details on complaints, refer to Audit Table 1 – Administrative Conditions

3.6. Incidents

No environmental incidents have been reported since the commencement of operations.

3.7. Adequacy of documentation required under the Approval

All documents listed in *Section 1.5 - List of Approvals and documents audited / reviewed* were sighted and reviewed for adequacy at this audit. Whilst the documents were generally adequate and appropriate, an Observation was raised regarding a lack of definition of what constitutes an exceedance of water quality criteria, and the lack of inclusion of new water quality monitoring conditions (D22 to D25) in the Water Quality Monitoring Program and Water Quality Management Sub-Plan. Refer to Table 4 – Audit findings, actions and recommendations for further detail.

3.8. Site Inspection outcomes – including photos

A site inspection and interview with the Supervisor Eden Cruise Operations and the acting Harbour Master / Pilot were conducted on Sunday 30 November 2025. An interview was also held with the Harbour Master (Paul Webster) during the pre-audit meeting on 25 November 2025. The site inspection and interviews covered water quality, traffic, transport and access, noise and visual amenity, air quality, waste management, and the inspection and monitoring processes. The inspection / observation of activities continued throughout the disembarkation of passengers, transport of passengers onto shuttle buses and tour buses and other subsequent activities relating to cruise ship operations.

Overall, the outcome of the site inspection and audit was positive with no significant issues identified in relation to compliance to the conditions of approval or commitments made in the OEMP and OEMP Sub-Plans.

Photos taken during the audit site visit are presented with commentary below:

Photos taken during Independent Audit site inspection on 30 November 2025	
	
<p>Anthem of the Seas coming into port at 7.02am</p>	<p>Final stages of securing lines at approx. 7.30am</p>
	
<p>Lines secured with the assistance of a forklift with a special attachment to enable safe lifting and movement of ropes. Forklifts with “beepers” were not used until after 7am.</p>	<p>Volunteers and signage directing passengers to the appropriate shuttle uses on a very rainy day.</p>

Photos taken during Independent Audit site inspection on 30 November 2025



Good signage and bunting to direct passengers to the safe routes to the shuttle buses. Areas where buses were moving and turning were blocked to ensure passenger safety



Variable Message Signs (VMSs) were deployed to prevent vehicles other than shuttle buses to the wharf after 7am.

Passengers queuing for the shuttle buses at the Eden Welcome Centre. It was observed that queues were minimised through efficient availability of shuttle buses.



Waste facilities available to all users of the wharf

Skip bins available to selected users at the wharf (most were locked)

Photos taken during Independent Audit site inspection on 30 November 2025



General waste bins were available for passengers disembarking and embarking the cruise ship (also available on non-cruise days).



Spill kits available in a separate part of the wharf kiosk, used by security and Port Authority SECO during cruise days. Door was left unlocked and was fully accessible during the cruise day.



View of door to spill kit storage area



Previous audit identified issues with waste oil and other chemical storage (facility unrelated to Eden Cruise Wharf). It was confirmed that the facility is closed and no longer has any chemicals or oils stored on site.



Passage plan for cruise ship showing maximum speeds within the bay area (8 knots in outer area through to 4 knots near the cruise wharf (limit of 10 knots)



One of the additional temporary bus stops in the town of Eden – with temporary flagging / signage.

4.0 Audit Conclusions

This Independent Environmental Audit (IEA) was conducted as a requirement of the SSI conditions of approval (SSI 7734 Conditions A24 to A27) for the operation of the Eden Cruise Wharf, and this report fulfils the obligations of the Port Authority of NSW in respect to those conditions (i.e., undertaking this second annual operation audit). Conditions A24 to A27, and how they have been satisfied are detailed below:

No.	Condition	How condition was satisfied
A24	Compliance audits of the SSI must be conducted annually, commencing within a year of the commencement of Construction, by an independent, suitably qualified and experienced expert or within another timeframe agreed with the Secretary	<p>The first annual operational IEA was conducted in December 2022, therefore the next annual audit was due in December 2023. No Compliance audit was conducted in 2023. In August 2024, the Port Authority wrote to the Department, DPHI on 13 August 2024 providing notification of the non-compliance and requested to alter the frequency. DPHI, agreed to reduce the frequency of Independent Compliance Audits, in a letter dated 17 September 2024 from Annual to Triennial, with the Project's next Independent Compliance Audit being the 2025 Independent Compliance Audit, and then every three years ongoing.</p> <p>This audit (and the first annual operational IEA) was conducted in November / December 2025 by Julie Dickson of Dickson Environmental Consulting and Audit (DECA).</p> <p>The auditor (Julie Dickson) is a certified Lead / Master Environmental Auditor with Exemplar Global. A Master Auditor is defined as a Lead Auditor who has been certified for than 12 years.</p> <p>Julie is independent of the Port Authority of NSW and the project and has certified this in the Auditors Declaration of Independence in Appendix A of this report.</p>
A25	Details of the nominated independent auditor must be submitted to the Secretary for approval no later than one month prior to the audit being undertaken.	The auditor (Julie Dickson) was nominated in a letter from the Port Authority NSW to the Department of Planning on 29 October 2023 and the audit commenced on site on 30 November 2025, which is within the one-month requirement. DPHI approved the nominated independent auditor in correspondence dated 4 November 2025.
A26	The Proponent must submit a copy of the audit report to the Secretary with a response to any recommendations contained in the audit report within six weeks of completing the audit, or within another timeframe agreed with the secretary.	The previous Independent Environmental Audit Report was issued on 7 Feb 2023, and was submitted to the Department, along with a response to recommendations on 8 February 2025, which is within the required submission time frame.

No.	Condition	How condition was satisfied
A27(a)	The audit report must: (a) assess the environmental performance of the SSI, and its effects on the surrounding environment;	The sections of this Audit report – Summary of Environmental Performance (3.4), Site Inspection outcomes (3.8), and the Executive Summary provide a summary of the environmental performance of the SSI.
A27(b)	(b) assess whether the project is complying with the terms of this approval;	The Audit Tables 1 – 4 (in Appendix E) include all conditions of approval relevant to the operation of the facility, and provides a column for Compliance Status (Compliant, non-compliant or not triggered). Implementation of the requirements of the approved OEMPs and sub-plans are included in Audit Table 5 in Appendix E of this report. A summary of compliance with conditions of approval are included in Table 3, Table 4 and Section 3.1 of this report.
A27(c)	(c) review the adequacy of any document required under this approval; and	The adequacy of the documentation is addressed in Section 3.7 of this report. One Opportunity for Improvement was raised in regard to the use of beepers as opposed to non-tonal alarms (quackers) on the forklift. .
A27(d)	(d) recommend measures or actions to improve the environmental performance of the SSI, and improvements to any document required under this approval.	Recommendations are included in Table 4 – Audit findings, actions and recommendations, and are summarised in the Executive Summary and Section 3.4 – Summary of Environmental Performance.

The environmental audit was conducted by Julie Dickson of Dickson Environmental Consulting and Audit (DECA), who was approved as an independent auditor by the Planning Secretary of the Department of Planning, Housing and Infrastructure on 4 November 2025. The audit was conducted in accordance with the AS / NZS / ISO 19011:2018 – Guidelines for Auditing Management Systems and in line with the DPIE Post Approval Requirements, May 2020.

Whilst the requirements of the Post Approval Requirements were generally adhered to, due to the timing of the Approval (pre-2018), the consultation requirements were not required to be implemented on agreement with the Department of Planning, Housing and Infrastructure.

The audit concluded, that overall, there was a high level of compliance to the conditions of approval, however, three (3) non-compliances, two (2) Observations and one (1) Opportunity for Improvement were raised at this audit (see Table 4 for details). The positive outcomes of the audit were recognised, and these are summarised in the Executive Summary.

The non-compliances related to:

- Condition A24 - No environmental compliance audit was undertaken in the calendar year of 2023 (self-reported). Following a request from Port Authority, DPHI agreed to reduce the frequency of Independent Compliance Audits from Annual to Triennial with the next audit to be conducted in 2025 (this audit) and then every three years ongoing.
- Condition D13 (pre-MOD 3): The 2023/2024 Air Quality Operation Monitoring Report was submitted more than one month after the end of the 2023/24 Cruise Ship Season (as

required by Pre-Mod 3 Condition D13 and Section 7.1 of the previous (prior to MOD 3) Air Quality Monitoring Program.

- Condition D24: The Operational Air Quality Monitoring Report – Quantum class visit (triggered by the arrival of the cruise ship Ovation of the Seas on 22 Feb 2025 per Condition D17 b) was not submitted within the 3 months requirement.

It was considered by the auditor that the above non-compliances were administrative in nature, primarily related to timing, and had minimal, if any material effect on environmental performance of the project.

The Observations related to:

- Operational Water Quality Monitoring Program not fully adequate – does not define what constitutes an exceedance and does not address the requirements of Conditions D22 to D25;
- Traffic Management requirement of Condition E7A not known by key personnel (however condition not breached).

The Opportunity for Improvement related to:

- Replacement of beepers with non-tonal alarms (quackers) on the forklift.

The auditor would like to thank Port Authority of NSW for their cooperation, assistance and provision of relevant documents and records.

5.0 Appendix A – Auditors Declaration of Independence

Project Name: Eden Cruise Ship Facility (Operation)

Consent Number: SSI 7734

Description of Project: Operation of the Eden Cruise Ship Facility

Project Address: Port of Eden - located at the end of Weecoon Street within Snug Cove

Proponent: Port Authority of NSW

Title of Audit: Independent Environmental Audit – Operations – Eden Cruise Wharf

Date: 19 December 2025


I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department May 2020);
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a. Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b. The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor: Julie Dickson

Signature: 

Qualification: Exemplar Global Lead Environmental Auditor – Registration No 13573

Company: Dickson Environmental Consulting and Audit Pty Ltd

Company Address: P.O. Box 69, Berowra 2081

6.0 Appendix B – Independent Auditor Approval



Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-7734-PA-22

Mr Francisca Alvarez
Environmental Planning Officer
PORT AUTHORITY NSW
04/11/2025

Sent via the Major Projects Portal only

Subject: Eden Breakwater Wharf Extension - Independent Auditor 2025

Dear Ms Alvarez

I refer to your request of 29 October 2025, seeking the agreement of the Planning Secretary of the NSW Department of Planning, Housing and Infrastructure ("NSW Planning") of the suitability of the auditor's qualifications, experience and independence to undertake an independent audit of Eden Breakwater Wharf Extension ("the development"), in accordance with Schedule 2, Condition A25 of State significant infrastructure approval SSI 7734, as modified ("the approval").

Having considered the qualifications and experience of Ms Julie Dickson of Dickson Environmental Consulting, as nominee of the Planning Secretary, I endorse the appointment of Ms Dickson, in accordance with Condition A25 of the approval. This approval is conditional on Ms Dickson being independent of the development and maintaining Exemplar Global certification. NSW Planning reserves the right to request an alternate auditor for future audits.

Please ensure this correspondence, including the independent audit declaration form are appended to the Independent Audit Report.

The audit is to be conducted in accordance with the Independent Audit Post Approval Requirements (Department 2020 or as updated). A copy of this guideline can be located at <http://planning.nsw.gov.au/Policy-and-Legislation/Mining-and-Resources/Integrated-Mining-Policy>. Auditor may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

The audit report is to include the following:

- assess the environmental performance of the SSI, and its effects on the surrounding environment;
- assess whether the project is complying with the terms of this approval;
- review the adequacy of any document required under this approval; and
- recommend measures or actions to improve the environmental performance of the SSI, and improvements to any document required under this approval.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124

www.dphi.nsw.gov.au

1



Department of Planning, Housing and Infrastructure

Within six weeks of the completion of the audit, you are to submit a copy of the audit report to the Planning Secretary, together with your response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Planning Secretary, it is recommended that you review the report to ensure it complies with the relevant consent condition.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you need to discuss the above, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly", enclosed in a light grey rectangular box.

Katrina O'Reilly
Team Leader - Compliance
Compliance

As nominee of the Planning Secretary

7.0 Appendix C – DPHI correspondence – consultation requirements

From: Francisca Alvarez <falvarez@portauthoritynsw.com.au>
Sent: Tuesday, 4 November 2025 12:46 PM
To: Georgia Dragicevic <Georgia.Dragicevic@planning.nsw.gov.au>
Cc: Christa Sams <CSams@portauthoritynsw.com.au>
Subject: RE: Eden Breakwater Wharf Extension - Independent Auditor 2025

Dear Georgia,

Thank you for the Planning Secretary of the NSW Department of Planning, Housing and Infrastructure ("NSW Planning") letter approving our proposed Independent Auditor for the SSI 7734, as per condition A25.

With regard to the NSW Planning's letter, Port Authority would like to raise an item of concern. The letter states that 'The audit is to be conducted in accordance with the Independent Audit Post Approval Requirements (Department 2020 or as updated).'

Port Authority notes that the SSI 7734 approval was granted in 2017 and the Audit Post Approval Requirements were published in 2020, consequently the approval does specifically mention or require the audit to comply with the Audit Post Approval Requirements. The Audit Post Approval Requirements contains additional scope for the audit than that in Condition A27. For example, Section 3.2 of the Audit Post Approval

Requirements require the auditor to consult with the Department and potentially other stakeholders, and investigate the issues raised, specifically it says:

"The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit.

Comments received during such consultation must be recorded and reported in the Independent Audit Report. Specific environmental issues raised during consultation should be investigated and findings of the investigation must be reported in the Independent Audit Report..."

The above has the potential to significantly increase the scope of the audit, however such additional scope is not required under the planning approval.

Further, the Fact Sheet for the Post-approval requirements for state-significant projects (May 2020) states that 'Projects approved prior to the release of the Independent Audit PAR (December 2018) that have existing conditions requiring independent auditing **will not have to undertake independent audits in line with either the revised Independent Audit PAR (2018 or 2020 versions)**. These projects will continue to undertake independent audits in accordance with the requirements of their conditions'.

Port Authority will instruct the Independent Auditor to undertake the audit in accordance with Condition A27, and *generally* in accordance with the Audit Post Approval Requirements, however we do not intend to increase scope of the audit above what is required under Condition A27, and do not propose to consult with other stakeholders as per Section 3.2 of the Audit Post Approval Requirements.

We would appreciate your feedback on this matter.

Kind regards,

Francisca Alvarez | Environmental Planning Officer

My work days are Monday to Friday

Port Authority of New South Wales
Level 4, 20 Windmill Street | Walsh Bay NSW 2000 Australia
PO Box 25 | Millers Point NSW 2000 Australia

E: falvarez@portauthoritynsw.com.au
T: +61 476 682 910 |
www.portauthoritynsw.com.au



From: Georgia Dragicevic <Georgia.Dragicevic@planning.nsw.gov.au>
Sent: Tuesday, 4 November 2025 3:35 PM
To: Francisca Alvarez <falvarez@portauthoritynsw.com.au>
Cc: Christa Sams <CSams@portauthoritynsw.com.au>
Subject: RE: Eden Breakwater Wharf Extension - Independent Auditor 2025

Hi Fransisca,

The condition of consent takes precedence and is the one you need to comply with.

Hope this clarifies the matter.

Kind regards,
Georgia

8.0 Appendix D – DPHI correspondence –Extension of Time

From: Francisca Alvarez <falvarez@portauthoritynsw.com.au>
Sent: Thursday, 6 November 2025 1:05 PM
To: Georgia Dragicevic <Georgia.Dragicevic@planning.nsw.gov.au>
Cc: Christa Sams <CSams@portauthoritynsw.com.au>
Subject: RE: Eden Breakwater Wharf Extension - Independent Auditor 2025

Hi Georgia,

Thank you.

Condition A26 of the approval states that 'The Proponent must submit a copy of the audit report to the Planning Secretary with a response to any recommendations contained in the audit report **within six weeks** of completing the audit, or within another timeframe agreed with the Planning Secretary.'

Our proposed audit date is 30 November 2025. Six weeks from this date includes the Christmas shutdown period.

Port Authority therefore proposes to submit the final audit report with a response to any recommendations contained in the audit report within nine weeks of completing the audit, by 30 January 2026.

Is Planning agreeable to this extension?

Thank you

Kind regards,

Francisca Alvarez | Environmental Planning Officer

My work days are Monday to Friday

Port Authority of New South Wales

Level 4, 20 Windmill Street | Walsh Bay NSW 2000 Australia
PO Box 25 | Millers Point NSW 2000 Australia

E: falvarez@portauthoritynsw.com.au

T: +61 476 682 910 |

www.portauthoritynsw.com.au



We acknowledge and pay our respect to the traditional custodians of the lands and waters of NSW and all Aboriginal Elders, past, present and emerging.

RE: Eden Breakwater Wharf Extension - Independent Auditor 2025



Georgia Dragicevic <Georgia.Dragicevic@pla>

To Francisca Alvarez

Cc Christa Sams

Reply Reply All Forward

Fri 7/11/2025 12:36 PM

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

That is fine.

Please submit the extension request via major projects so that we have it on file.

Kind regards,

Georgia











9.0 Appendix E – Audit Tables

9.1. AUDIT TABLE 1 – Schedule 2 - PART A - Administrative Conditions

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		SCHEDULE 2 – PART A ADMINISTRATIVE CONDITIONS			
1.	A1	The SSI must be carried out:		The SSI has been carried out in general compliance to the conditions of consent (however non-compliances self-reported and included in this IEA - reported separately)	Compliant
		(a) in compliance with the conditions of this consent;			
		(b) in accordance with all written directions of the Planning Secretary		No written directions of the Planning Secretary	Not triggered
		(c) generally in accordance with:	Operational Environmental Management Plan - Eden Cruise Wharf September 2024	<p>The OEMP dated September 2024 incorporates the requirements of the Environmental Assessment Report 2023 and Submissions Report 2024.</p> <p>Audit Table 5 assesses against the comments made in the OEMP and subplans.</p> <p>The previous IEA determined that the project was generally in accordance with the EIA and Response to Submissions.</p> <p>This IEA considered the additional requirements from MOD 3 in Table 5 - OEMP Implementation and determined that the project was also operated generally in accordance with the Environmental Assessment Report dated 14 September 2023 and the Submissions Report dated 16 February 2024.</p>	Compliant
		<p>i. the Eden Breakwater Wharf Extension State Significant Infrastructure – Environmental Impact Statement, dated 3 November 2016,</p> <p>ii. Response to Submissions Report Eden Breakwater Wharf Extension, dated 24 February 2017; and</p> <p>iii. Eden Breakwater Wharf Extension Modification Request to Infrastructure Approval SSI 7734, dated 2 July 2018;</p> <p>iv. Letter titled “Re: Eden Breakwater Wharf MOD 1 – Response to Submissions – Air Quality and Noise”, dated 17 August 2018;</p> <p>v. Response to Submission Eden Breakwater Wharf Extension MOD 1 (SSI 7734), dated 3 September 2018;</p> <p>vi. SSI 7734 Mod 1 – Addendum Modification Report, dated 14 October 2018;</p> <p>vii. Eden Cruise Facility Modification 2 to SSI 7734 Extending Use of Cruise Facility to other Vessels, dated July 2020; and</p> <p>viii. Eden Cruise Facility Response to Submissions - Modification 2 to SSI 7734 Extending Use of Cruise Facility to other Vessels, dated August 2020;</p>			

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		ix. Environmental Assessment Report Eden Cruise Wharf – Modification 3 to SSI 7734 dated 14 September 2023; and x. Submissions Report Eden Cruise Wharf – Modification 3 to SSI 7734 dated 16 February 2024.			
2.	A2	The SSI must be carried out generally in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents referred to in conditions A1(c) unless otherwise specified in, or required under, this approval.	These audit tables, particularly Table 6 – OEMP Requirements.	The SSI has been operated in accordance with the commitments made in the OEMP, sub-plans and monitoring programs. Refer to Table 5 - OEMP Implementation for details.	Compliant
3.	A3	The SSI must be carried out in accordance with the terms and conditions of all other approvals, permits and licences.	Notification of Referral Decision - EPBC Referral 2016/7828 dated 13 April 2017.	Whilst there are no other approvals, permits or licences, an EPBC referral decision was made on 13 April 2017 noting that the project is not a controlled action if undertaken in a particular manner. The only operational requirement arising from the referral decision (Condition 4B) is that a suitable speed is 10 knots or less is observed to avoid collisions with whales etc. This requirement was being observed.	Compliant
4.	A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of the inconsistency, ambiguity or conflict between them and a document listed in condition A1(c) In the event of any inconsistency, ambiguity or conflict between any of the documents listed in condition A1(c) , the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Noted	Not triggered
5.	A5	The Proponent must comply with all requirements of the Planning Secretary in relation to: (a) the environmental performance of the SSI; (b) any document or correspondence in relation to the SSI; (c) the terms of this approval and any notification given to the Planning Secretary under the terms of this approval;	Interviews with Port Authority management	It was advised that there have been no Planning Secretary requirements imposed on the Facility outside of the Infrastructure Approval. There have been no additional requirements requested by the Planning Secretary. Independent Environmental Audits did not identify any non-compliances requiring action.	Not triggered

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		(d) any audit of the Construction or Operation of the SSI; (e) compliance with the terms of this approval (including anything required to be done under this approval); and (f) the carrying out of any additional monitoring or mitigation measures. (g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval. (MOD 3 addition)			
6.	A6	Without limitation, all strategies, plans, programs, reviews, audits, report recommendations, protocols and other documents must be implemented in accordance with all requirements issued by the Planning Secretary from time to time in respect of them.	Interview with the Port Authority management team	There have been no additional requirements requested by the Planning Secretary	Not triggered
7.	A7	Where the terms of this approval require consultation with identified parties, details of the consultation undertaken, matters raised by the parties, and how the matters were considered must accompany the strategies, plans, programs, reviews, audits, protocols and the like submitted to the Planning Secretary.	Section 5.2.3.1 and 7.1 of the OEMP - Invasive Species Noise OEMP Sub-Plan Sept 2024 - Section 1.4 - OEMP Consultation. Water Quality OEMP Sub Plan Sept 2024 - Section 1.4 - OEMP Consultation. Operational Water Quality Monitoring Program July 2024 - Worley Consulting	Since the previous IEA, the OEMP and sub-plans have been revised and updated to include the MOD 3 requirements. The following consultation outcomes were documented within the OEMP and relevant sub-plans: Section 5.2.3.1 of the OEMP - Invasive Species and Section 7.1 indicates that PRIRD were consulted during the MOD 3 consultation process regarding invasive marine species. The Water Quality Monitoring Program including a	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<p>Traffic Transport and Access OEMP sub-plan Sept 2024 - Section 1.4 - OEMP Consultation.</p> <p>Air Quality Management Sub-Plan Sept 2024</p> <p>Operational Air Quality Monitoring Program July 2024- Section 1.4 - Consultation</p> <p>Community Consultation Committee Meeting Minutes</p> <p> CCC Meeting Minutes - 5 December 2024</p> <p> CCC Meeting Minutes - 8 August 2023</p> <p> CCC Meeting Minutes - 11 September 24</p> <p> CCC Meeting Minutes - 12 June 2024</p> <p> CCC Meeting Minutes - 16 May 2023</p> <p> CCC Meeting Minutes - 21 February 2023 (1)</p> <p> CCC Meeting Minutes - 21 February 2023</p> <p> CCC Meeting Minutes - 21 February 2024</p> <p> CCC Meeting Minutes - 21 November 2023</p> <p> CCC Meeting Minutes - 25 October 2022</p> <p>Port of Eden Stakeholder Group Minutes (replacing CCC) 2 April 2025 and 25 June 2025 (meet Quarterly). Minutes are available on the Port Authority website.</p>	<p>Sampling and Analysis Plan was prepared in consultation with DPIRD Fisheries.</p> <p>An Air Quality Monitoring Program associated with MOD 3 was prepared in consultation with Council.</p> <p>The Air Quality Management Sub-Plan was prepared in consultation with EPA and the Harbour Master</p> <p>The 2024 Noise OEMP was updated in consultation with Bega Valley Shire Council, Eden Harbour Master and EPA.</p> <p>The 2024 Water Quality OEMP sub-plan and Operational Water Quality Monitoring Program was prepared in consultation with DPIRD Fisheries</p> <p>The Traffic Transport and Access OEMP sub-plan was prepared in consultation with Council and the Harbour Master (no comments)</p>	
8.	A8	This approval lapses five years after the date on which it is granted, unless Construction of the SSI has commenced on or before that date.		Noted – not triggered. Construction commenced within 5 years	Not triggered
	A9 to A13	Ancillary Facilities – relevant to Construction only – not relevant to Operations			Not triggered
	A14 – a16	ENVIRONMENTAL REPRESENTATIVE Relevant to Construction only – not relevant for Operations			Not triggered
9.	A17	COMPLIANCE TRACKING PROGRAM	Operation Compliance Tracking Program Document Number DOC19/170684 Rev 0 – Issued for Use 10 July 2019 and Rev) A – Reissued following DPIE comments 2	As noted in the previous IEA, the Operation Compliance Tracking Program was approved by the Secretary delegate in correspondence dated 9	Not triggered

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		The Operation Compliance Tracking Program must be submitted to the Planning Secretary for approval no later than one month prior to commencement of Operation or within another timeframe agreed with the Planning Secretary.	Aug 2019. Operational Compliance Tracking Program (PDF of the live spreadsheet where compliance against Conditions of Approval are tracked	August 2019. Operation Commenced in September 2019. There have been no revisions to the formal program since 2019. This was a one-off requirement and is not triggered at this IEA. However, a master compliance spreadsheet - for all conditions is maintained by Port Authority. - A PDF version relating to the Eden Cruise Facility is on the website under Compliance and Monitoring Reports.	
10.	A18	The Construction and Operation Compliance Tracking Programs must be implemented for the duration of Construction and Operation , or within another timeframe agreed with the Planning Secretary based on the outcomes of independent audits, Environmental Representative Reports and regular compliance reviews submitted through Compliance Reports .	Operation Compliance Report 2022-2023 - Eden Cruise Ship Facility Port Authority - June 2024 Five Year Operation Compliance Summary Report 2023-2024 - Feb 2025 Operation Compliance Report 2024-2025 - Eden Cruise Ship Facility - Port Authority 18 November 2025.	The Operation Compliance Report for 2022-2023 covered the period between 1 July 2022 to 30 June 2023.(4th reporting period) was submitted as required. The Operation Compliance Report 2023-2024 and 5 year Operations Compliance Summary Report covered the 2023/2024 cruise Season and Extended Use (5th reporting year) was submitted as required. The Operation Compliance Report 2024-2025 Operations Compliance Report covered the 2024/2025 (6th reporting year) cruise Season was submitted as required.	Compliant
11.	A19	A Pre-Construction Compliance Report and Pre-Operation Compliance Report must be prepared and submitted to the Planning Secretary for information no later than one month prior to the commencement of Construction and Operation respectively or within another timeframe agreed with the Planning Secretary.		Not triggered this was a one-off requirement which was assessed as compliant at the previous IEA	Not triggered
12.	A20	Construction and Operation must not commence until the Pre-Construction Compliance Report and Pre-Operation Compliance Report respectively have been submitted to the Planning Secretary.		Not triggered - this was a one-off requirement which was assessed as compliant at the previous IEA	Not triggered

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
13.	A21	<p>Operation Compliance Reports must be prepared and submitted to the Planning Secretary for information after the first calendar year of operation, the end of the 2019/2020 cruise season and following that, after the end of each cruise season, or within another timeframe agreed with the Planning Secretary.</p>	<p>Previous IEA Operation Compliance Report 2022-2023 - June 2024</p> <p>Post Approval Form 2022-2023 OCR 18/06/2024</p> <p>Operation Compliance Report 2023-2024 and 5 year Operations Compliance Summary Report -- Feb 2025</p> <p>Operation Compliance Report Application number: SSI 7734 2024/2025 Cruise Season dated November 2025</p> <p>Letter from DPHI dated 20/02/2025 acknowledging submission of the Operational Compliance Report for the period Oct 2023 to March 2024.</p> <p>Post Approval Form - submission of the 2024/25 OCR to Planning under conditions A21, A23 and B6. (no date on form).</p> <p>Email from Major projects portal - acknowledgement of submission of 2024/25 OCR dated 17 Nov 2025.</p> <p>Post Approval Form - submission of the 5 year OCR to Planning under conditions A21, A23 and B6, D1 & D13. Letter from DPHI: Request to change frequency of Annual Independent Compliance Audits and Operational Compliance Reports dated 17/09/2024</p>	<p>Since the previous IEA, Operation Compliance Reports have been prepared for each Cruise Season.</p> <p>Evidence was provided to indicate that Operation Compliance Reports (OCRs) were prepared and submitted to the Planning Secretary (Reports and Post Approval Form submissions) at the end of each cruise season to meet the requirements of this condition.</p> <p>It is noted that in the letter from DPHI dated 17/09/2024 in response to Port Authority's request for change of frequency of Operational Compliance Report, the Planning Secretary agreed that the Project can cease preparing and submitting Operational Compliance Reports (OCRs) after the 2025-26 cruise season OCR is submitted.</p>	Compliant
14.	A22	<p>COMPLIANCE REPORTS</p> <p>The Pre-Construction and Pre-Operation Compliance Reports must include:</p> <p>(a) details of how the terms of this approval that must be addressed prior to the commencement of Construction and Operation respectively have been complied with;</p> <p>(b) in the event of a non-compliance with the terms of this approval that must be addressed prior to the commencement of Construction and Operation respectively, details of the non-compliance and action taken to rectify the non-compliance; and</p> <p>(c) the commencement date for Construction and Operation respectively.</p>		Not triggered - this was a one-off requirement which was assessed as compliant at the previous IEA.	Not triggered

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
15.	A23	<p>Construction and Operation Compliance Reports must include:</p>	<p>Operation Compliance Report 2022-2023 - June 2024</p>	<p>Section 2.3 of Compliance Reports - Environmental Monitoring and Visual Surveillance</p>	Compliant
		<p>(a) a results summary and analysis of environmental monitoring;</p>	<p>Operation Compliance Report 2023-2024 and 5 year Operations Compliance Summary Report -- Feb 2025</p>		
		<p>(b) a summary of the Complaints Register required under Condition A28 including the number of any complaints received, a summary of main areas of complaint, action taken, response given and proposed strategies for reducing the recurrence of such complaints;</p>	<p>Operation Compliance Report Application number: SSI 7734 2024/2025 Cruise Season dated November 2025</p>	<p>Section 4 of Compliance Report 2022/2023 reported "No complaints".</p> <p>The 2023/2024 and Summary report provided the history of complaints from 2019 to 2024, noting no complaints in the first 4 reporting periods, and one complaint in the 2023/2024 period. Action taken was documented.</p> <p>Section 4 of the 2024 / 2025 Compliance Report recorded 5 complaints. Each complaint included the date, time, description of issue and details of the complaint and response. All complaints related to noise.</p> <p>The strategies for reducing the recurrence of such complaints were detailed in Section 4: <i>"As a result of the complaints Port Authority has streamlined the complaints process to ensure our cruise operations team on the ground are notified directly when we receive a complaint in Eden"</i></p>	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		(c) details of any review of, and minor amendments made to, OEMP ;		<p>Section 7 of the 2024/2024 and Section 6 of the 2024/2025 - OEMP Reviews and consistency Assessments.</p> <p>The 2023/2024 OCR notes that the OEMP was combined with the Extended Use OEMP and updated at the end of 2024 to incorporate consolidated conditions updated with MOD 3. OEMP Sub-Plans were also updated and new OEMP Sub- Plans prepared as required.</p> <p>The 2024/2025 OCR notes that the approved OEMP and OEMP Sub-plans updated after MOD 3) were prepared and approved by the Secretary's nominee in accordance with the Infrastructure Approval in correspondence dated 4 October 2024 and are available on the Port Authority website.</p>	Compliant
		(d) a register of any consistency assessments undertaken and their status;		Section 6 and 7 of the OCRs - as above	Compliant
		(e) results of any independent environmental audits and details of any actions taken in response to the recommendations of an audit;		Section 5 of the OCRs	Compliant
		(f) a summary of all incidents notified in accordance with Condition A33 and Condition A34 of this approval including actions taken to address the cause or impact of an incident;		Section 3 - A Section exists, however no pollution incidents have been reported in any of the OCRs to date	Compliant
		(g) a Five Year Operational Compliance Summary Report every five years from commencement of Operation, unless otherwise agreed by the Planning Secretary, which includes: i. the name and size of visiting cruise ships and date of visits, ii. the number and nature of complaints in relation to specific cruise ships,		<p>The Operation Compliance Report 2023-2024 and 5 year Operations Compliance Summary Report was issued in February 2025.</p> <p>Section 6.1 included tables of cruise ships visiting during the 2019/2020 (18), 2020/2021 (none), 2021/2022 (none), 2022/2023 (31) and 2023/2024 (37) cruise seasons. The name, size and dates or arrival and departures were included.</p>	Compliant
		iii. results of air quality monitoring and any noise monitoring undertaken to investigate repeated noise complaints, iv. identification of any issues that need to be addressed through revision of the OEMP and/or Sub-plans; and		Section 1.5 included details of the non-cruise ship visits	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		(h) any other matter relating to compliance with the terms of this approval or as requested by the Planning Secretary.		Section 2.1	
16.	A24	<p>COMPLIANCE AUDITING</p> <p>Compliance audits of the SSI must be conducted annually, commencing within a year of the commencement of Construction, by an independent, suitably qualified and experienced expert or within another timeframe agreed with the Planning Secretary.</p>	<p>Eden Cruise Ship Facility Five-Year Operation Compliance Summary Report 2023/2024 Cruise Season and Extended Use February 2025</p> <p>Letter from DPHI to Port Authority of NSW dated 17/09/2025 Subject: Request to change frequency of Annual Independent Compliance Audits and Operational Compliance Reports.</p>	<p>No independent environmental audit was undertaken in the 2023 calendar year (non-compliance with condition A24).</p> <p>Port Authority wrote to the Department, DPHI on 13 August 2024 providing notification of the non-compliance and requested to alter the frequency of Annual Independent Compliance Audits. DPHI, in a letter dated 17 September 2024, agreed to reduce the frequency of Independent Compliance Audits from Annual to Triennial, with the Project's next Independent Compliance Audit being the 2025 Independent Compliance Audit, and then every three years ongoing.</p>	Non-compliant
17.	A25	Details of the nominated independent auditor must be submitted to the Planning Secretary for approval no later than one month prior to the audit being undertaken.	Letter from Department of Planning Housing and Infrastructure (DPIE) dated 4 November 2025 – Subject: Eden Breakwater Wharf Extension - Independent Auditor 2025	In the letter from DPHI it was acknowledged that the request to seek the agreement of the Planning Secretary for the approval of the auditor was made on 29 October 2025. The audit was conducted on 30 November 2025, which is within the one-month requirement.	Compliant
18.	A26	The Proponent must submit a copy of the audit report to the Planning Secretary with a response to any recommendations contained in the audit report within six weeks of completing the audit, or within another timeframe agreed with the Planning Secretary.	<p>Post Approval Form (no date) Eden Breakwater Wharf Extension - SSI-7734-PA-9 - Compliance Audit - Operation Eden Cruise Wharf 2022 - conditions A24, A25 and A27.</p> <p>Letter from DPE dated 17/02/2023 acknowledging the submission of the Independent Environmental Audit Report and Response to Audit Recommendations on 8 February and 17 February 2023</p>	The previous Independent Environmental Audit Report was issued on 7 Feb 2023, and was submitted to the Department, along with a response to recommendations on 8 February, which is within the required submission time frame.	Compliant
19.	A27	The audit report must: (a) assess the environmental performance of the SSI, and its effects on the surrounding environment;	<p>This Audit Report - refer to sections</p> <p>Section 3.4 of this Audit Report –Summary of Environmental Performance;</p> <p>Section 3.6 – Site Inspection Outcomes – including photos</p>	This Audit Report assesses the environmental performance of the SSI in the sections - Summary of Environmental Performance, Site Inspection outcomes, Executive Summary and Audit Conclusion.	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			Executive Summary; Audit Conclusions		
		(b) assess whether the project is complying with the terms of this approval;	This Audit Report - refer to sections: Audit Tables (Table 1 - 6) Table 3 - summary of compliance against audit criteria Table 4 - Audit Findings, actions and recommendation and; Section 3.4.1 - Compliance with Infrastructure Approval	The Audit Tables include all conditions of approval relevant to the operation of the facility, and provides a column for Compliance Status (Compliant, non-compliant or not triggered). A summary of compliance with conditions of approval are included in the Audit Tables and Findings Tables.	Compliant
		(c) review the adequacy of any document required under this approval; and	This Audit Report - refer to section: Section 3.5 – Adequacy of documentation required under the approval	One Observation has been raised in regard to the adequacy of documentation. Whilst the Operational Compliance Reports note that there have been no exceedances, the Water Quality Monitoring Program and Water Quality Management Sub-Plan do not adequately define what constitutes an exceedance.	Compliant OBS
		(d) recommend measures or actions to improve the environmental performance of the SSI, and improvements to any document required under this approval.	This Audit Report - refer to section: Table 4 - Audit Findings, actions and recommendation and Section 3.4 –Summary of Environmental Performance	Recommendations are included in Table 4 – Audit findings, actions and recommendations, and are summarised in the Executive Summary and Section 3.4 – Summary of Environmental Performance	Compliant
20.	A28	COMPLAINTS REGISTER A Complaints Register must be maintained for the duration of Construction and Operation.	Consultation Manager - extract sorted by site and type of event to	A complaints process continues to be implemented by the Port Authority through the electronic Consultation Manager platform. Consultation Manager can be filtered to show complaints for any particular site managed by Port Authority. The Complaints Register was included in the 2024 / 2025 Operation Compliance Report, recording 5 noise related complaints. Port Authority use Consultation Manager - complaints are directed to the call centre, the complaints are forwarded immediately to Eden SECO / management.	Compliant
21.	A29	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	Interview with Port Authority's Senior Community & Stakeholder Engagement Advisor.	It was advised that there have been no requests by NSW Planning for a copy of the Complaints Register.	Not triggered

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
22.	A30	The following information must be available to facilitate community enquiries and complaints within one (1) month from the date of this approval:	https://www.portauthoritynsw.com.au/port-operations/port-eden/port-services-and-facilities/eden-cruise-wharf		Compliant
		(a) a 24 hour telephone number for the registration of complaints and enquiries about the SSI;		a) A 24 hour number is available on the Eden Wharf website: Phone: 02 9296 4962. OracleCMS manages Port Authority's complaints and enquiries line.	
		(b) a postal address to which written complaints and enquires may be sent;		b) A postal address is provided on the website in the OEMP, which is available on the project website;	
		(c) an email address to which electronic complaints and enquiries may be transmitted; and	An email address is included on the website - Email: enquiries@portauthoritynsw.com.au and in the OEMP;		
		(d) a mediation system for complaints unable to be resolved.	https://www.portauthoritynsw.com.au/around-ports/port-botany/community/community-complaints-procedure	The Complaints process is detailed on the Port Authority (general - all ports) website. Section 4 of the complaints process notes that complaints may be referred to the operations team for real-time investigation and action if required (e.g. contacting a ship and/or the ship's agent in the event of a noise complaint. It was advised that there have been no complaints which have not been able to be resolved.	
This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.		There is a complaints procedure on the website - general website.			
23.	A31	The telephone number, postal address and email address required under Condition A30 of this approval must be published in a newspaper circulating in the local area prior to the commencement of Construction and published in the same way again prior to the commencement of Operation . This information must also be provided on the website required under Condition B6 of this approval.	Previous IEA Report	This condition is not triggered at this IEA - the requirement to publish prior to operation was a one-off requirement and was assessed as compliant at the previous IEA	Not triggered
24.	A32	The Complaints Register must record the:	Operation Compliance Report Application number: SSI 7734 2024/2025 Cruise Season dated November 2025 -	The complaints register is contained within the broader Consultation Manager platform, whereby	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		(a) number of complaints received; (b) number of people affected in relation to a complaint; (c) means by which the complaint was addressed and whether resolution was reached, with or without mediation.	Section 4 - Complaints. Interview with Senior Community & Stakeholder Engagement Advisor (Larissa S)	complaints can be filtered by facility. Complaints were not received in the 2022 / 2023 or the 2023 / 2024 cruise seasons, however 5 complaints were recorded in the 2024 / 2025 seasons. These complaints were summarised in a table in the latest OCR, detailing the number of complaints (5), the vessel involved, the issue and the detail of the complaint and response. It was advised that each complaint was by a single person. No mediation has been required for any of the complaints.	
25.	OEMP 3.5.2	A Complaints Register will be maintained for the duration of Operation of the Facility. As part of the Complaints management procedure, a legible record of all Complaints made will be kept, including the following: <ul style="list-style-type: none"> • Date and time of complaint (if provided) • Method by which complaint was made (phone, email, post, in person) • Personal details of complainant which were provided by the complainant or, if no such details were provided, a note to that effect • Nature of the complaint • Action taken in relation to the complaint, including follow up contact with complainant • If no action taken, note outlining the reason(s) why no action was taken. 	Consultation Manager - Excel spreadsheet export detailing all Eden Wharf complaints. Operation Compliance Report Application number: SSI 7734 2024/2025 Cruise Season dated November 2025 - Section 4 - Complaints.	The complaints from Consultation Manager were summarised in a table in the latest OCR, detailing the number of complaints (5), the vessel involved, the issue and the detail of the complaint and response. It was advised that each complaint was by a single person. No mediation has been required for any of the complaints. The exported excel spreadsheet from Consultation Manager includes a field for "Interaction Type". Complaints recorded were received through the following interaction types: Email, 24-hour line, and SMS.	Compliant
26.	OEMP 3.5.2	The Complaints Register will be provided to any authorised officer of the relevant regulatory authority (such as the DP&E and Department of the Environment and Energy (DoEE) upon request, within the timeframe stated in the request. The Complaints register will be kept for a minimum of four years after the initial complaint was made.	Interviews with Port Authority Supervisor Eden Cruise Operations (SECO)	It was advised that the Complaints Register has not been requested by any regulatory body. Data from Complaints Manager is retained indefinitely on the system.	Not triggered
28.	A33	INCIDENT NOTIFICATION			

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		The Planning Secretary must be notified as soon as possible and in any event within 24 hours of the Proponent being made aware of any incident.	Interviews with Port Authority Operation Compliance Report 2022-2023 - June 2024 Operation Compliance Report 2023-2024 and 5 year Operations Compliance Summary Report -- Feb 2025 Operation Compliance Report Application number: SSI 7734 2024/2025 Cruise Season dated November 2025 - Section 4 - Complaints.	It was advised that there have been no reportable incidents since the last compliance reporting period. The 2022/2023 Compliance Report note that there were no pollution or environmental incidents during the 2022/23 reporting season. The 2023/2024 Compliance Report note that there were no pollution or environmental incidents during the 2022/23 reporting season. The 2024/2025 Compliance Report note that there were no pollution or environmental incidents during the 2022/23 reporting season.	Not triggered
29.	A34	Notification of an incident under Condition A33 of this approval must include the time and date of the incident, details of the incident and must identify any non-compliance with this approval.	As above	No Incidents recorded - none reported in the Port Authority MYOSH - incident reporting system	Not triggered
31.	A35	Any requirements of the Planning Secretary or relevant public authority (as determined by the Planning Secretary) to address the cause or impact of an incident reported in accordance with Condition A33 of this approval, must be met within the timeframe determined by the Planning Secretary or relevant public authority.	Interviews with Port Authority Operation Compliance Report 2022-2023 - June 2024 Operation Compliance Report 2023-2024 and 5 year Operations Compliance Summary Report -- Feb 2025 Operation Compliance Report Application number: SSI 7734 2024/2025 Cruise	There have been no pollution or environmental incidents or near misses recorded since commencement of Operations and therefore no requirements of the Planning Secretary have been raised.	Not triggered
32.	A36	If statutory notification is given to the EPA as required under the POEO Act in relation to the SSI, such notification must also be provided to the Planning Secretary within 24 hours after the notification was given to the EPA.	Interviews with Port Authority Management Operational Compliance Reports (various)	There have been no statutory notifications to EPA required – see Condition A33.	Not triggered
33.	A37	STAGING			

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		The SSI may be constructed and operated in stages. Where staged construction or operation is proposed, a Staging Report (for either or both construction and operation as the case requires) must be prepared and submitted to the Planning Secretary for information. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation), or within another timeframe agreed with the Planning Secretary.	Operation Compliance Reports Interviews	There was no staged approach to the commencement of the Operation of the Facility.	Not triggered
34.	A38	<p>The Staging Report must:</p> <p>(a) if staged construction is proposed, set out how the construction of the whole of the SSI will be staged, including general details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence;</p> <p>(b) if staged operation is proposed, set out how the operation of the whole of the SSI will be staged, including general details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence;</p> <p>(c) specify the relevant conditions of approval that apply to each stage and how compliance with those conditions will be achieved across and between each of the stages of the SSI; and</p> <p>(d) set out mechanisms for managing any cumulative impacts arising from the proposed staging</p>	As above	As above	Not triggered
35.	A39	The SSI must be staged in accordance with the Staging Report, as submitted to the Planning Secretary.	As above	As above	Not triggered
36.	A40	Where staging is proposed, the terms of this approval that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	As above	As above	Not triggered

9.2. AUDIT TABLE 2 – Schedule 2 – PART B – Community Information and Reporting

	CoA No / Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		SCHEDULE 2 – PART B COMMUNITY INFORMATION AND REPORTING			
37.	B1	<p>Prior to commencement of Construction, the Proponent is required to establish a Community Consultative Committee.</p> <p>The Community Consultative Committee is to be established in accordance with the Department's Community Consultative Committee Guidelines for State Significant Projects, dated November 2016, or from an existing group that can be demonstrated to meet the purposes and objectives of the Guidelines as agreed by the Planning Secretary.</p> <p>The committee is to include representatives from port businesses, maritime user groups, residents surrounding the Port of Eden and the Relevant Maritime Authority and is to operate during Construction and during Operation of the SSI for a period as agreed with the Planning Secretary, but not for less than five years from commencement of operation of the committee.</p>	Eden Cruise Ship Facility Five-Year Community Consultative Committee Report December 2024	<p>Section 2.3 of the five-year report notes: "<i>The CCC comprises an independent chairperson, and community representatives from port businesses, maritime user groups, residents surrounding the Port of Eden and the relevant maritime authority, a council representative, and members of the project team. The Eden CCC is currently chaired by Port Authority. Transport for NSW (TfNSW) is a member of the CCC providing planning, operational and project updates on maritime related matters as needed</i>".</p> <p>Section 2.5 discusses a recommendation for continuation or disbandment of the CCC.</p> <p>At the December 2024 meeting, the Eden CCC: - endorsed the Draft Five Year Eden CCC Compliance Report, - agreed to disbandment of the Eden CCC, and - supported the formation of the new Eden Stakeholder Group and the Terms of Reference for that group (with updates as documented in the December 2024 meeting minutes),</p> <p>Eden Stakeholder Group (ESG) is now operating, meeting at least quarterly.</p> <p>See Condition B2 below.</p>	Compliant
38.	B2	A Report endorsed by the Community Consultative Committee is to be submitted to the Planning Secretary five years after commencement of Operation of the SSI, reporting on whether the purpose of the Committee has been achieved and completed, and recommending a timeframe for continued operation.	<p>Eden Cruise Ship Facility Five-Year Community Consultative Committee Report December 2024</p> <p>Post Approval Form - submission of Eden Five-Year CCC Report (Condition B2) - submitted 19/12/2024.</p>	<p>The Five Year Community Consultative Committee Report included the following:</p> <p>At the December 2024 meeting, the Eden CCC: - endorsed the Draft Five Year Eden CCC Compliance Report, - agreed to disbandment of the Eden CCC, and</p>	Compliant

	CoA No / Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<p>Where disbandment of the committee is recommended, it is to be replaced with a community-based forum, as provided for in the Community Communication Strategy, operating for the life of the SSI unless otherwise agreed by the Planning Secretary. The Community Consultative Report recommending disbandment must be submitted to the Planning Secretary for consideration and include:</p> <p>(a) minutes of the Community Consultative Committee meeting documenting member agreement to disbandment; and</p>	<p>Eden Cruise Wharf Community Communication Strategy - Operations and Maintenance Phase 12 November 2025 - Rev 3.</p> <p>CCC Meeting Minutes 5 December 2024</p> <p>Terms of Reference: Port of Eden Stakeholder Group.</p>	<p>- supported the formation of the new Eden Stakeholder Group and the Terms of Reference for that group (with updates as documented in the December 2024 meeting minutes).</p> <p>Section 4 of the Five Year report noted that the report will be submitted to the Secretary for consideration.</p> <p>The December 2024 minutes noted that the Five-year summary report must be endorsed by members, and that once endorsed, the final report will be submitted to the Planning Secretary. It also noted that "<i>council endorses the Draft Five Year CCC Compliance Report and supports the formation of the new Eden Stakeholder Group which will provide greater coordination and communication amongst agencies.</i>".</p> <p>The revised Community Communication Strategy notes that in January 2025, the CCC was disbanded and replaced with the Port of Eden Stakeholder Group (ESG) and that there are Terms of Reference for that group.</p>	
		<p>(b) proposed membership of the community-based forum.</p> <p>Note: the community-based forum must include local residents and may be an existing community liaison group.</p>	<p>Eden Cruise Ship Facility Five-Year Community Consultative Committee Report December 2024</p> <p>Eden Cruise Wharf Community Communication Strategy Operations and Maintenance Phase 12 November 2025 - Rev 3.</p> <p>CCC Meeting Minutes 5 December 2024</p>	<p>The revised Community Communication Strategy notes that in January 2025, the CCC was disbanded and replaced with the Port of Eden Stakeholder Group (ESG).</p>	Compliant
39.	B3	<p>A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication between the Proponent, the ER, the relevant Council, the Community Consultative Committee and/ or community-based forum, others directly impacted by the SSI during Construction of the SSI and for the life of the Operation of the SSI, unless otherwise agreed by the Planning Secretary.</p>	<p>Eden Cruise Wharf Community Communication Strategy Operations and Maintenance Phase May 2023</p> <p>Eden Cruise Wharf Community Communication Strategy Operations and Maintenance Phase 12 November 2025 - Rev 3.</p>	<p>The Community Communication Strategy has been revised since the last IEA to include the requirements of MOD 3.</p>	Compliant

	CoA No / Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
40.	B4	The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than one month prior to commencement of any work (excluding works described in paragraphs (a) to (c) in the definition of Construction) for the purposes of the SSI, or within another timeframe agreed with the Planning Secretary. Work for the purposes of the SSI (excluding works described in paragraphs (a) to (c) in the definition of Construction) must not commence until the Community Communication Strategy has been approved by the Planning Secretary.		Not triggered – construction phase requirement.	Not triggered
41.	B5	The Community Communication Strategy must:	Eden Cruise Wharf Community Communication Strategy Operations and Maintenance Phase May 2023	Section 6 identifies key stakeholders in table form.	Compliant
		(a) identify people to be consulted during Construction and Operation;	Eden Cruise Wharf Community Communication Strategy Operations and Maintenance Phase 12 November 2025 - Rev 3.	Section 5.4 provides a list of stakeholder types that will be consulted during Operations and Maintenance.	
		(b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the SSI;	As above	Addressed in Section 5.2 - Communication Tools	Compliant
		(c) provide for the formation of community-based forums that focus on key environmental management issues for the SSI arising from Compliance Reports; and	As above	Addressed in Section 5.2 Communication Tools, and Section 5.3 Community Consultative Committee	Compliant
		(d) set out procedures and mechanisms: i. through which the community can discuss or provide feedback to the Proponent; ii. through which the Proponent will respond to enquiries or feedback from the community; and iii. to resolve any issues and mediate any disputes that may arise in relation to environmental management and delivery of the SSI.	As above	Addressed in Section 5.2 Communication Tools and Section 5.5 - Community Contact Procedure	Compliant
42.	B6	PROVISION OF ELECTRONIC INFORMATION		A Port Authority maintains a website which contain links to various operational ports including the Port of Eden	Compliant

	CoA No / Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<p>A website providing information in relation to the SSI must be established prior to commencement of Construction and maintained for the duration of Construction and Operation. Up-to-date information (excluding confidential commercial information) must be published and maintained on the website or dedicated pages including:</p> <p>(a) information on the current implementation status of the SSI;</p>	<p>https://www.portauthoritynsw.com.au/port-operations/port-eden/port-services-and-facilities/eden-cruise-wharf</p>	<p>overview and Eden Cruise Wharf. The website includes sections for:</p> <ul style="list-style-type: none"> * Project Approval; * Operational Environmental Management Plans, Sub-plans and Monitoring Programs; * Compliance and Monitoring Reports; and * Eden Stakeholder Group. <p>Each of the sections can be expanded and include links to the relevant documentation. The Project Approval section specifically references SSI 7734, with details on the original approval and on MOD 2 and MOD 3. A link is provided to the NSW Government Major Projects Website.</p>	Compliant
		<p>(b) a copy of the documents listed in Condition A1 and Condition A2 of this approval, and any documentation relating to any modifications made to the SSI or the terms of this approval;</p>	<p>https://www.planningportal.nsw.gov.au/major-projects/projects/eden-breakwater-wharf-extension</p>	<p>As noted on the Eden Cruise Wharf website. "Project approval information and documents for the Eden Breakwater Wharf extension were completed by Department of Industry and are available on the NSW Government Major Project's website"</p>	Compliant
		<p>(c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval;</p>		<p>The Consolidated approval (up to MOD 3) is available on the NSW Government Planning Portal</p>	Compliant
		<p>(d) a copy of each statutory approval, licence or permit required and obtained in relation to the SSI including Commonwealth permits or approvals;</p>		<p>Statutory Approvals relevant to the SSI 7734 were available via a link to the NSW Major Projects Planning Portal on the Port Authority Website.</p> <p>There are no Commonwealth Approvals relating to the project, however it is noted that a referral decision was made on 13 April 2017 that the project is not a controlled action if undertaken in a particular manner.</p> <p>The EPBC 2016/7828 Eden Breakwater Wharf Extension referral was recently uploaded to the Port Authority website for completeness.</p>	Compliant
		<p>(e) a current copy of each document required under the terms of this approval and any endorsements, approvals or requirements from the ER and Planning Secretary, all of which must be published prior to the commencement of</p>	<p>Website as above</p>	<p>At the time of the audit, the Port Authority website, together with the link to the NSW Planning Portal included all relevant approvals by NSW Planning , Operational Environmental Management Plans, sub-plans and monitoring programs, compliance and</p>	Compliant

	CoA No / Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		any works to which they relate or prior to their implementation as the case may be; and		monitoring reports, CCC minutes and the 5-year Community Consultative Committee Report	
		<p>(f) the outcomes of compliance tracking required under this approval.</p> <p>Information relating solely to construction may be removed from the website 12 months following completion of construction.</p>	<p>The Eden Cruise Wharf Website included the following: Operation Compliance Tracking Program Operation Compliance Reports (see Condition A23) Eden Water Quality Monitoring Eden Water Quality Monitoring Five Year Operation Compliance Summary Report</p> <p>Environment tab of the Port Authority Website: https://www.portauthoritynsw.com.au/sustainability-and-heritage/environment/eden-air-quality-monitoring</p>	Compliance tracking documents provided on the Port Authority Website, including air and water quality reports.	Compliant

9.3. AUDIT TABLE 3 – Schedule 2 - PART D – Operational Environmental Management

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		OPERATIONAL ENVIRONMENTAL MANAGEMENT			
43.	D1	D1 An Operational Management Plan (OEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures made and identified in the EIS and Submissions Report will be implemented and achieved during Operation.	Operational Environmental Management Plan Eden Cruise Wharf September 2024 Letter from DPHI dated 04/10/24: Eden Breakwater Wharf Updated Operational Environmental Management Plan in reference to request for approval of OEMP, and sub-plans	In the letter from DPHI dated 4 October 2024, the nominee for the Planning Secretary approved the OEMP and Sub-Plans under Condition D5	Compliant
44.	D2	<p>The OEMP must provide:</p> <p>(a) a description of management and monitoring activities. Where the OEMP covers activities to be carried out under other approvals, licences and permits, the OEMP must clearly identify which activities are to be carried out under this approval;</p> <p>(b) details of environmental policies, guidelines and principles to be followed in the operation of the SSI;</p> <p>(c) a list of all the OEMP Sub-plans required in respect of Operation, as set out in Condition D3.</p> <p>(d) details of how the Operation of the SSI will be carried out under the OEMP and OEMP Sub-plans to:</p> <p>i. achieve the environmental performance outcomes identified in the documents listed in Condition A1(c);</p> <p>ii. implement the mitigation measures identified in the documents listed in Condition A1(c); and any additional measures recommended in Compliance Audits or to address any issues identified in the Five-Year Operational Compliance Summary Reports;</p> <p>iii. comply with the relevant terms of this approval; and</p>	Operational Environmental Management Plan Eden Cruise Wharf September 2024	<p>Addressed in Sections 6 and 7 of the OEMP</p> <hr/> <p>Addressed in Section 3 of the OEMP</p> <hr/> <p>Addressed in Section 1.1 of the OEMP</p> <hr/> <p>Addressed in Section 7 of the OEMP</p> <hr/> <p>Addressed in Section 4 of the OEMP</p> <hr/> <p>Addressed in Section 8 of the OEMP</p>	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		iv. address issues during Operation, as identified through the Community Consultative Committee, community-based forums provided for under Condition B5, Complaints Register or Monitoring Programs, through a process of continual improvement;		Addressed in Section 8 of the OEMP	
		(e) an inspection program detailing the activities to be inspected and frequency of inspections;		Addressed in Section 8.3 of the OEMP	
		(f) a description of the roles and environmental responsibilities of the Proponent's employees and their relationship with the Relevant Maritime Authority and Council including roles and responsibilities for management of any matters which are to be reported in the Operation Compliance Reports required under Condition A21;		Addressed in Section 4 of the OEMP	
		(g) for training and induction for employees, including contractors and sub-contractors, in relation to environmental and compliance obligations under the terms of this approval;		Addressed in Section 4.2 of the OEMP	
		(h) a mechanism for communicating the environmental and compliance obligations under this approval to cruise ship operators;		Addressed in Section 4.2 of the OEMP	
		(i) procedures for the notification of the NSW Food Authority in relation to sewage, fuel and oil sillage spill events;		Addressed in Section 5.2 of the OEMP	
		(j) procedures for the avoidance of and timeframes for the notification of vessel strikes of marine fauna that are observed under pilotage to NPWS;		Addressed in Section 5.2 of the OEMP	
		(k) procedures for the expediate notification of DPI Aquatic Biosecurity Unit of any new sightings of C lepadiformis;		Addressed in Section 5.2 of the OEMP	
		(l) reference to potential turbidity impacts from larger vessel classes as an operational risk; and		Addressed in Section 6 of the OEMP	
		(m) for the periodic review and update of the OEMP and all associated plans and programs.		Addressed in Section 8.6 of the OEMP	

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status															
		Note: DPI Aquatic Biosecurity is the direct contact for all marine pests and diseases. Contact for suspected reports should be via the 24-hour hotline 1800 675 888 and queries directed to the mailbox: aquatic.biosecurity@dpi.nsw.gov.au. Refer to Schedule 2 of the Biosecurity Act 2015 and Schedule 1 of the Biosecurity Regulation 2017 for prohibited and notifiable matters.		Mentioned in Section 1.3 of the OEMP																
45.	D3	<p>The following OEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each OEMP Sub-plan, and in consideration of the relevant requirements in this approval and the Proposed Mitigation Measures</p> <table border="1"> <thead> <tr> <th></th> <th>Required OEMP Sub-plan</th> <th>Relevant government agencies to be consulted</th> </tr> </thead> <tbody> <tr> <td>(a)</td> <td>Traffic, Transport and Access</td> <td>Council, Relevant Maritime Authority</td> </tr> <tr> <td>(b)</td> <td>Noise Management</td> <td>Council, EPA, Relevant Maritime Authority</td> </tr> <tr> <td>(c)</td> <td>Air Quality Management</td> <td>EPA, Relevant Maritime Authority</td> </tr> <tr> <td>(d)</td> <td>Water Quality</td> <td>DPI Fisheries</td> </tr> </tbody> </table>		Required OEMP Sub-plan	Relevant government agencies to be consulted	(a)	Traffic, Transport and Access	Council, Relevant Maritime Authority	(b)	Noise Management	Council, EPA, Relevant Maritime Authority	(c)	Air Quality Management	EPA, Relevant Maritime Authority	(d)	Water Quality	DPI Fisheries	<p>Traffic, Transport and Access Sub-Plan Eden Cruise Wharf Sept 2024</p> <p>Noise Management Sub-Plan Eden Cruise Wharf Sept 2024</p> <p>Air Quality Management Sub-Plan Eden Cruise Wharf September 2024</p> <p>Water Quality Management Sub-Plan Eden Cruise Wharf September 2024</p>	<p>The OEMP and subplans were prepared in consultation with the following Stakeholders:</p> <p>TTAMP: Bega Valley Shire Council (BVSC), Harbour Master (no comments)</p> <p>Noise Management: Bega Valley Shire Council, EPA, Eden Harbour Master</p> <p>Air Quality Management: Bega Valley Shire Council (BVSC or Council), the EPA and the Eden Community Consultative Committee, Eden Harbour Master</p> <p>Water Quality: Department of Primary Industries and Regional Development (DPIRD) – Fisheries (formerly DPI Fisheries),</p>	Compliant
	Required OEMP Sub-plan	Relevant government agencies to be consulted																		
(a)	Traffic, Transport and Access	Council, Relevant Maritime Authority																		
(b)	Noise Management	Council, EPA, Relevant Maritime Authority																		
(c)	Air Quality Management	EPA, Relevant Maritime Authority																		
(d)	Water Quality	DPI Fisheries																		
46.	D4	The OEMP Sub-plans must include, to the written satisfaction of the Planning Secretary, information requested by an agency to be included in an OEMP Sub-plan, including copies of all correspondence from those agencies.	Letter from DPHI dated 04/10/24: Eden Breakwater Wharf Updated Operational Environmental Management Plan in reference to request for approval of OEMP, and sub-plans	The letter from DPHI referred to the submission of the OEMP and Sub-Plans by Port Authority on 13 September 2024 for approval. The letter acknowledged that the Sub-Plans submitted included: Traffic, Transport and Access Sub-Plan (September 2024); Noise Management Sub-Plan (September 2024) Air Quality Management Sub-Plan (September 2024); Water Quality Management Sub-Plan (September 2024).	Compliant															

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
47.	D5	<p>The OEMP and OEMP Sub-plans must be submitted to the Planning Secretary for approval no later than one month prior to the commencement of relevant operations, unless another timeframe is agreed with the Planning Secretary.</p> <p>Revised OEMP and OEMP sub-plans resulting from the findings of Five Yearly Compliance Summary Report are to be submitted to the Planning Secretary for approval no later than one month following submission of the Five Yearly Compliance Summary Reports.</p>	<p>Operational Environmental Management Plan Eden Cruise Wharf September 2024</p> <p>Letter from DPHI dated 04/10/24: Eden Breakwater Wharf Updated Operational Environmental Management Plan in reference to request for approval of OEMP, and sub-plans</p>	<p>In the letter from DPHI dated 4 October 2024, the nominee for the Planning Secretary approved the revised OEMP and Sub-Plans under Condition D5</p> <p>The above letter from DPHI noted that the OEMP and Sub-Plans:</p> <ul style="list-style-type: none"> * have been prepared in consultation with Council, the EPA and DPIRD Fisheries; * have been updated to include changes to the project approved by Modification 3, consistent with Condition D5A; * contain the information required by the conditions of approval; * are applicable to, and will be implemented for, the whole approved project; and. * were submitted to the Planning Secretary at least one month before commencing Modification 3 related operations, consistent with Condition D5. <p>Accordingly, as nominee of the Planning Secretary, I approve the OEMP and Sub-Plans under Condition D5.</p>	Compliant
48.	D5A	<p>The approved OEMP and OEMP Sub-plans must be updated to address the requirements and mitigation measures proposed in the documents listed in Condition A1(c) in relation to Modification 3.</p>	<p>Operational Environmental Management Plan Eden Cruise Wharf September 2024</p> <p>Traffic, Transport and Access Sub-Plan Eden Cruise Wharf Sept 2024</p> <p>Noise Management Sub-Plan Eden Cruise Wharf Sept 2024</p> <p>Air Quality Management Sub-Plan Eden Cruise Wharf September 2024</p> <p>Water Quality Management Sub-Plan Eden Cruise Wharf September 2024</p> <p>Water Quality Management Sub-Plan Eden Cruise Wharf Rev 3 17 October 2025 (also updated to include feedback from DPIRD from monitoring report)</p> <p>Letter from DPHI dated 04/10/24: Eden Breakwater Wharf Updated Operational Environmental Management Plan in reference to request for approval of OEMP, and sub-plans</p>	<p>The OEMP and subplans were updated in 2024 to address the requirements of MOD 3 and documents listed in Condition A1)</p> <p>In the letter from DPHI dated 4 October 2024, the nominee for the Planning Secretary approved the OEMP and Sub-Plans under Condition D5</p>	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
49.	D6	The OEMP as approved by the Planning Secretary and amended from time to time, must be implemented for the duration of relevant operations and must be made publicly available prior to the commencement of and for the duration of the relevant operations.	Site Inspection Interviews with Port Authority personnel	Overall, the site inspection and review of evidence found that the OEMP was satisfactorily implemented, with no non-compliances identified relating to implementation of measures. Implementation of the OEMP is addressed separately in detail throughout this report and in Table 5 and Table 6 of this report.	Compliant
50.	D7	<p>OPERATION MONITORING PROGRAM</p> <p>Operational Air Quality Monitoring (Pre-Modification 3)</p> <p>The Air Quality Operation Monitoring Program, as approved prior to Modification 3, and as amended from time to time, must be implemented until the end of the 2023/24 cruise season.)</p>	<p>Monthly Ambient Air Quality Monitoring Reports (4) 2024:</p> <ul style="list-style-type: none"> * April 2024 - Ektimo dated 12 September 2024 * March 2024 - Ektimo dated 12 September 2024 * Feb 2024 - Ektimo dated 12 September 2024 * Jan 2024 - Ektimo dated 12 September 2024 <p>Eden Cruise Ship Facility 5 year Operations Compliance Summary Report 2023/2024 Cruise Season and Extended Use - Port Authority Feb 2025;</p> <p>The monitoring reports can be found at https://www.portauthoritynsw.com.au/sustainability-and-heritage/environment/eden-air-quality-monitoring</p>	<p>Ektimo was engaged by Port Authority of New South Wales to commission and operate an ambient air quality monitoring station (AAQMS) at 8 By Street Eden, NSW. The air quality monitoring is required for the operation of the Eden Cruise Facility under Conditions D7 to D14 of the SSI Approval No. 7734 Air Quality Operation Monitoring Program.</p> <p>The 2023/2024 OCR notes that the Air Quality Operation Monitoring Program (incorporated in the Air Quality OEMP sub-plan) was prepared in consultation with the agencies and was approved by the Secretary's nominee in correspondence dated 15 September 2019. The OCR also notes that the approved and current Air Quality Management Sub-plan and Air Quality Monitoring Program (updated after MOD 3) are available on the Port Authority website.</p> <p>The Port Authority website notes that the 2020 - 2023 monitoring program was suspended.</p>	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
51.	D8	<p>Condition - Pre-modification 3 The Air Quality Operation Monitoring Program must provide: (a) details of baseline data available; (b) details of baseline data to be obtained and when; (c) details of all monitoring of the project to be undertaken; (d) the parameters of the project to be monitored; (e) the frequency of monitoring to be undertaken; (f) the trigger for operational monitoring (g) the location of monitoring; (h) the reporting of monitoring results; (i) procedures to identify and implement additional mitigation measures where results of monitoring are unsatisfactory; and (j) any consultation to be undertaken in relation to the monitoring programs.</p> <p>Condition - MOD 3 The results of the Air Quality Operation Monitoring Program as approved prior to Modification 3, must be submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of an Operation Monitoring Report at the frequency identified in the Air Quality Operation Monitoring Program.</p>	<p>Eden Cruise Ship Facility Operation Compliance Report 2022-2023 Cruise Season and Extended Use - Port Authority - June 2024;</p> <p>Eden Cruise Ship Facility 5 year Operations Compliance Summary Report 2023/2024 Cruise Season and Extended Use - Port Authority Feb 2025;</p> <p>Eden Cruise Ship Facility Operation Compliance Report 2024/2025 Cruise Season - Port Authority 18 November 2025.</p>	<p>Original / Old Condition D8 (strikethrough). Cruise Season 2022/2023 - reported in Compliance Report as compliant with original D8 Condition (strikethrough). Confirmed at this audit.</p> <p>Cruise Season 2023/2024 - reported in 5-year Compliance Report as compliant with original D8 Condition. The MOD 3 version of the aligns with the old Condition D13, which was determined as non-compliant in the 5-year Compliance Report. (See Condition D13).</p> <p>New Condition D8 (red)</p> <p>Cruise Season 2024/2025 (5 Nov 2024 to 18 April 2025) - reported in the 2024/2025 Compliance Report as Not Applicable as the Eden Cruise Ship Facility's SSI approval was modified on 24 May 2024 (MOD 3). However, the aligned condition D13 was determined in this Compliance Report as non-compliant. (See Condition D13).</p>	Compliant
52.	D9	<p>OPERATIONAL MONITORING PROGRAMS (Modification 3) Conditions D10 to D25 apply to operations associated with Conditions D17 and D20.</p>		Noted	Noted

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
53.	D10	Operational Monitoring Program(s) must be prepared to compare actual operational performance against predicted performance of that identified in Condition A1(c)(ix) and (x). The Operational Monitoring Program(s) must be prepared in consultation with the identified relevant authorities. Details of information requested by an agency during consultation must be provided to the Planning Secretary as part of any submission of the relevant Operational Monitoring Program, including copies of correspondence from those agencies as required by Condition Error! Reference source not found.	<p>Operational Air Quality Monitoring Program Eden Cruise Wharf July 2024</p> <p>Operational Water Quality Monitoring Program (Worley Consulting) July 2024</p> <p>Eden Cruise Wharf Modification 3 to SSI 7734 Operational Water Quality Monitoring Program 23 Sept 2025 (Worley Consulting)</p> <p>Letter from Port Authority to DPHI dated 23 Oct 2025 - Mod 3: Updated Water Quality OEMP Sub-Plan and Water Quality Operational Monitoring Program.</p>	<p>Air Quality Monitoring Program Sections 4 (Operational Monitoring Program – Quantum and Oasis Vessel Events) and Section 5 (Operational Monitoring Program – over 60 Vessel Cruise Season) address the requirements of the Condition. Section 1.3 notes: <i>"A high-level overview of the programs has previously been presented and provided to NSW Department of Primary Industries and Regional Development (DPIRD) Fisheries. This detailed monitoring program will also be provided to NSW DPIRD Fisheries for final review and input as required by Condition D19. Copies are attached in Appendix C."</i></p> <p>The Water Quality Monitoring Program Sections 1.4 (Consultation) and 1.5 (Operational AQ Monitoring Program Approval, Revision and Distribution) and Appendix A address the requirements of this condition. Section 5.4 addresses Predicted Air Quality Concentrations.</p> <p>The Water Quality Monitoring Program was revised and updated in September 2025.</p> <p>Comments on the outcome of the Water Quality Monitoring report, and from this, the monitoring program was updated - Port Authority agreed to an additional location for continuous water monitoring.</p> <p>At the time of the IEA, feedback from Planning on the update to the water quality monitoring program July 2025 had not yet been received.</p>	Compliant
54.	D11	<p>Each Operational Monitoring Program must include:</p> <p>a) details of baseline data;</p> <p>(b) the relevant environmental performance criteria or parameter (including reference to where the criteria or parameter are identified in the documents listed in Condition A1(c)(ix) and (x))</p> <p>(c) details of monitoring of the project to be undertaken;</p> <p>(d) the parameters of the project to be monitored;</p> <p>(e) the frequency and lifespan of monitoring to be undertaken;</p>	<p>Operational Air Quality Monitoring Program Eden Cruise Wharf July 2024</p> <p>Operational Water Quality Monitoring Program (Worley Consulting) July 2024</p> <p>Eden Cruise Wharf Modification 3 to SSI 7734 Operational Water Quality Monitoring Program 23 Sept 2025 (Worley Consulting)</p> <p>Letter from Port Authority to DPHI dated 23 Oct 2025 - Mod 3: Updated Water Quality OEMP Sub-Plan and Water Quality Operational Monitoring Program.</p>	<p>Section 1.3, Table 1 Relevant requirements of Infrastructure Approval Mod 1-3 and OEMP Section Reference of the Air Quality Monitoring Program provides an overview of where each of these elements of the monitoring programs are addressed</p> <p>Section 1.3, Table 1-1 - MOD 3 Relevant Conditions of Approval Water Quality Monitoring Program provides an overview of where each of these elements of the monitoring programs are addressed</p>	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		(f) the location of monitoring; (g) the reporting of monitoring and analysis of results against the relevant environmental performance criteria or parameter; (h) details of the methods that will be employed to analyse the monitoring data; (i) procedures to identify and implement additional mitigation measures where results of monitoring are unsatisfactory; and (j) any consultation to be undertaken in relation to the monitoring programs.			
55.	D12	Where a relevant OEMP Sub-plan exists, the relevant Operation Monitoring Program may be incorporated into that OEMP Sub-plan		Separate Air Quality and Water Quality Monitoring Programs have been developed.	Not triggered

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
56.	D13	<p>Condition - Pre-Modification 3 The results of the Air Quality Operation Monitoring Program must be submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of an Operation Monitoring Report at the frequency identified in the relevant Operation Monitoring Program.</p> <p>The Operational Monitoring Program(s) must be submitted to the Planning Secretary for approval at least three (3) months prior to the first visit/cruise season to be monitored is expected to occur.</p>	<p>Eden Cruise Ship Facility Operation Compliance Report 2022-2023 Cruise Season and Extended Use - Port Authority - June 2024;</p> <p>Eden Cruise Ship Facility 5 year Operations Compliance Summary Report 2023/2024 Cruise Season and Extended Use - Port Authority Feb 2025;</p> <p>Eden Cruise Ship Facility Operation Compliance Report 2024/2025 Cruise Season - Port Authority 18 November 2025.</p> <p>Post Approval Form and acknowledgement - 24/07/2024 - submission of Air Quality Monitoring Program in accordance with Conditions D16 to D18 of MOD 3, covering applicable conditions D10, D11, D12, D13, D14, D16, D17 and D18.</p> <p>Post Approval Form and acknowledgement (created 23/07/2024) - submission of Water Quality Monitoring Program in accordance with conditions D19 to D23, covering Conditions D10, D11, D12, D13, D14, D19, D20, D21, D22 and D23.</p> <p>Eden Cruise Ship Facility Five-Year Operation Compliance Summary Report 2023/2024 Cruise Season and Extended Use February 2025.</p>	<p>Old Condition D13 (strikethrough) - non-compliant The Previous Condition D13 now aligns with Condition D8 - see Condition D8.</p> <p>Cruise Season 2022/2023 - reported in Compliance Report as not triggered. DPE advised on 2 August 2022 that they agreed to the ongoing suspension of the Air Quality Monitoring Program for season 2022/2023 cruise season.</p> <p>Cruise Season 2023/2024 – It was reported in the 5-year Compliance Report as non-compliant with Condition D13. Port Authority noted that the 2023/2024 Air Quality Operation Monitoring Report was submitted with the 5-year OCSR more than one month after the end of the 2023/24 Cruise Ship Season (being 28 March 2024)</p> <p>Section 7.1 of the previous Air Quality Operation Monitoring Program (prior to MOD 3) states that the Operation Monitoring Report 'will be prepared and submitted... to the Secretary one month after the end of each Cruise Ship Season for the duration of monitoring'.</p> <p>The five-year OCR was submitted in February 2025, which is 11 months after the end of the cruise season.</p> <p>Cruise Season 2024/2025 (5 Nov 2024 to 18 April 2025) – Reported as N/A - deleted from Compliance Report (reported against new Condition D8).</p> <p>New Condition D13 (red) - Compliant</p> <p>As noted in the 2024/2025 OCR, the Air Quality Operation Monitoring Program was submitted to the Secretary on 23 July 2024, more than three months prior to the Quantum class vessel (Ovation of the Seas) visiting the Port of Eden on 22 February 2025.</p> <p>The Air Quality Operation Monitoring Program was approved by the Secretary's nominee in correspondence dated 11 September 2024.</p>	Non-Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
57.	D14	<p>The Operational Monitoring Program(s), as approved by the Planning Secretary, must be implemented for the duration identified in the terms of this approval. Where no duration is specified in this approval, they must be implemented for the duration specified in the relevant Operational Monitoring Program or as specified by the Planning Secretary.</p>	<p>Operational Air Quality Monitoring Program Eden Cruise Wharf July 2024</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Final Report (GHD for Port Authority) dated 29 Oct 2025</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Report (GHD for Port Authority) – April to May 2025 dated 29 Oct 2025</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Report (GHD for Port Authority) – January to March 2025 dated 29 Oct 2025</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Report – October to December 2024 dated 30 April 2025</p> <p>Eden Cruise Wharf Modification 3 to SSI 7734 Operational Water Quality Monitoring Report - Quantum Class Visit Rev 0 (Worley Consulting) dated 19 May 2025.</p> <p>Eden Cruise Wharf Modification 3 to SSI 7734 Operational Water Quality Monitoring Program Rev 2 dated 23 September 2025 (Worley Consulting)</p> <p>Water Quality Management Sub-Plan Eden Cruise Wharf Rev 3 17 October 2025 (also updated to include feedback from DPIRD from monitoring report).</p> <p>Harbour Master Instructions Berthing Requirements Eden May 2025</p>	<p>Air Quality and Water Quality Monitoring Reports have been prepared.</p> <p>The Air Quality Monitoring Program requires that ambient air quality monitoring will be undertaken for the first cruised seasons which are scheduled to have more than 60 cruise ship visits (confirmed not yet triggered) A Quantum class or equivalent visit (triggered) and an Oasis Class (confirmed not yet triggered - unlikely to be triggered in the next few years - need additional infrastructure) or equivalent visit. Air Quality monitoring for the entire 2024/2025 cruise season was triggered by the first visit of a Quantum Class visit on 22 February 2025.</p> <p>The Water Quality Monitoring program was also triggered by the first visit of a Quantum Class vessel which occurred on 22 Feb 2025. Water quality monitoring was therefore undertaken as per the documented program (samples taken the day prior, the day of and the day after the first Quantum Class Vessel visit.</p> <p>Following feedback from DPIRD following the consultation on the results of the Water Quality Monitoring Program, the Water Quality Management Sub-plan was revised, and included correspondence from DPIRD. DPIRD supported the inclusion of a statement in the Harbour Master's Instructions relating to the minimisation of the use of thrusters to reduce sediment disturbance and the resultant impacts on water quality.</p>	Compliant
58.	D15	<p>Operation of the scenarios to be monitored, as identified in Conditions D17 and D20, must not commence until the Planning Secretary has approved the required Operational Monitoring Program(s), and relevant baseline data has been collected.</p>	<p>Letter from DPHI dated 11/09/2024 - Eden Cruise Wharf Operational Air Quality Monitoring Program approving the Operational Air Quality Monitoring Program (AQMP) dated July 2024.</p> <p>Post Approval Form (17/02/2025) Eden Breakwater Wharf Extension - SSI-7734-PA-20 - Eden Cruise Ship Facility Five-Yr OCSR - submission of 5-year Compliance Summary Report, 2023/2024 Operational Compliance Report and 2023/24 Air Quality</p>	<p>Evidence of approval prior to commencement of the scenarios to be monitored was provided.</p>	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			Operational Monitoring Report required by Condition D12 and D13		
59.	D16	<p>OPERATIONAL AIR QUALITY MONITORING (MODIFICATION 3)</p> <p>An Operational Air Quality Monitoring Program must be prepared in consultation with Council.</p>	Operational Air Quality Monitoring Program Eden Cruise Wharf July 2024	Consultation with Council is included in the Air Quality Monitoring Program	Compliant
60.	D17	<p>The Operational Air Quality Monitoring Program must enable the monitoring of the first cruise seasons which are scheduled to have:</p> <p>more than 60 cruise ship visits; and</p> <p>(b) a Quantum class (or equivalent) visit, and</p> <p>(c) an Oasis class (or equivalent) visit.</p>	<p>Operational Air Quality Monitoring Program Eden Cruise Wharf July 2024</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Final Report (GHD for Port Authority) dated 29 Oct 2025</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Report (GHD for Port Authority) –</p>	The Port Authority implemented an air quality monitoring program at Eden Cruise Ship Facility, Port of Eden, NSW for a period of seven months in 2025. The primary objective of this air quality monitoring program was to provide the Port Authority of NSW and local council with a greater understanding of local air quality from Port of Eden operations by undertaking air quality monitoring for a period of seven months to cover the cruise season	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<p>Note: Monitoring must be undertaken for the entire cruise season in which events listed in (a) – (c) are expected to occur.</p>	<p>April to May 2025 dated 29 Oct 2025</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Report (GHD for Port Authority) – January to March 2025 dated 29 Oct 2025</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Report – October to December 2024 dated 30 April 2025.</p>	<p>with consideration to seasonal weather variations.</p> <p>The parameters measured as part of the air quality monitoring program included wind speed, wind direction, PM2.5, NO2, and SO2 concentrations.</p> <p>The air quality monitoring reports covered the entire 2024/2025 cruise season</p> <p>The port received the first Quantum class visit on 22 February 2025, in the 24/25 cruise season. Therefore, Air Quality Monitoring was being undertaken during the entire 24/25 cruise season, triggered by the 22 February 2025 event, ending May 2025. The Air Quality Monitoring Report was dated 29 October 2025.</p> <p>No Oasis class ships (or equivalent) were recorded in the 24/25 cruise season.</p> <p>The Port has not yet had more than 60 cruise ship visits. It was advised that this will not be exceeded for the 2025 / 2026 season (expecting no more than 30 cruise ships).</p>	
61.	D18	<p>The Operational Air Quality Monitoring Program must include:</p> <p>(a) details and frequency of the monitoring of SO2, NO2, and PM2.5 at locations most likely to be impacted from cruise ship emissions, as identified in the documents listed in Condition A1(c);</p>	<p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Final Report (GHD for Port Authority) dated 29 Oct 2025</p>	<p>The Final Air Quality Monitoring Program Air Quality Monitoring Final Report (GHD Oct 2024) noted that the program was designed to fulfill Conditions of SSI 7734, including tracking SO2, NO2, and PM2.5 at key locations (D18), reporting results and mitigation actions (D24–D25), and conducting targeted monitoring around ship arrivals and departures (E21).</p>	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<p>(b) a review of the monitoring results that considers the performance of the SSI relative to the ambient air quality standards and the environmental parameters.</p>		<p>The Final Eden Air Quality Monitoring Report provides a summary of the monitoring results in the executive summary noting "One of the aims of this air quality monitoring program was to provide data to assess the ambient air quality environment against the relevant standards, alongside a comparison with previous measurements at Port of Eden. Additionally, the program was designed to fulfill Conditions of SSI 7734, including consultation with Council (D16), monitoring during high-traffic cruise seasons (D17), tracking SO₂, NO₂, and PM_{2.5} at key locations (D18), reporting results and mitigation actions (D24–D25), and conducting targeted monitoring around ship arrivals and departures (E21)".</p> <p>Section 9 - Conclusion includes a summary and review of monitoring results including comparison against predictions. The conclusion noted: "These results indicate that monitored NO₂ and SO₂ levels were well below predicted peak concentrations, while PM_{2.5} exceeded modelled estimates".</p> <p>The Exceedances and Mitigation section of the Conclusion noted that monitored "...SO₂ and NO₂ concentrations remained below the short term criteria...which confirms full compliance with all applicable SO₂ and NO₂ standards.</p> <p>The Conclusion further noted: <i>In contrast, exceedances of the PM_{2.5} criteria were observed on 18th, 19th, and 20th April 2025, potentially influenced by elevated regional background particulate levels. The Celebrity Edge was present for only a short period on one of the days of exceedance, therefore is considered unlikely to contribute to the elevated PM_{2.5} levels.</i>"</p>	
		<p><i>Note: Where monitoring at the most impacted receptor location(s) cannot be done for logistical or access reasons, a standardised procedure to adjust the measured result to reflect the most likely value that would have occurred at the receptor location is to be implemented (e.g. a look up table for the prevailing wind condition to determine the adjustment or scaling factor, per modelling result differences between the measured location and likely most</i></p>		<p>Monitoring has been undertaken as required - no issues arose in relation to accessing the most impacted receptors - not triggered.</p>	<p>Not triggered</p>

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<i>impacted receptor location under such wind conditions).</i>			
62.	D19	OPERATIONAL WATER QUALITY MONITORING (MODIFICATION 3) An Operational Water Quality Monitoring Program must be prepared in consultation with DPI Fisheries.	Operational Water Quality Monitoring Program Rev 0 dated 2 July 2024 (Worley Consulting). Email from DPIRD dated 2 July 2024 that DPI Fisheries are supportive of the Operational Water Quality Program as drafted. Email from DPIRD dated 16 Oct 2025 noting that DPIRD are supportive of the changes (following consultation) Letter from DPHI dated 25/09/2024 noting that it had been prepared in consultation with DPIRD Fisheries and contains the information required by the conditions of approval. Eden Cruise Wharf Modification 3 to SSI 7734 Operational Water Quality Monitoring Program Rev 2 dated 23 September 2025 (Worley Consulting)	Section 4.11 of the monitoring program - Shareholder Consultation - (Quantum and Oasis Vessel Events) and Section 5.12 - (over 60 vessel cruise season) note that the program was provided to NSW DPIRD Fisheries for review and consultation. Evidence of consultation with DPI Fisheries is included within the reviewed (Sept 2025) Water Quality Monitoring Program and the letter of approval from DPHI (25 Sept 2024).	Compliant
63.	D20	The Operational Water Quality Monitoring Program must enable the monitoring of the first: (a) cruise season with more than 60 vessel visits; and (b) visit of a Quantum class (or equivalent); and (c) visit of an Oasis class (or equivalent).	Operational Water Quality Monitoring Program Rev 0 dated 2 July 2024 (Worley Consulting) Eden Cruise Wharf Modification 3 to SSI 7734 Operational Water Quality Monitoring Program Rev 2 dated 23 September 2025 (Worley Consulting)	Section 5.12 of the monitoring program - Shareholder Consultation -(over 60 vessel cruise season) Section 4.11 of the monitoring program - Shareholder Consultation - (Quantum and Oasis Vessel Events) Section 4.11 of the monitoring program - Shareholder Consultation - (Quantum and Oasis Vessel Events)	Compliant
64.	D21	The Operational Water Quality Monitoring Program must include:	Eden Cruise Wharf Modification 3 to SSI 7734		Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<p>(a) details of the type and frequency of monitoring to be undertaken for single vessel events (the first Quantum class or equivalent and first Oasis class or equivalent) and the first cruise season with more than 60 vessel visits;</p> <p>(b) a review of the monitoring results that considers the performance of the SSI relative to the environmental parameters.</p>	<p>Operational Water Quality Monitoring Program (OWQMP) (Worley Consulting for Port Authority) Rev 0 2 July 2024</p> <p>Eden Cruise Wharf Modification 3 to SSI 7734 Operational Water Quality Monitoring Program Rev 2 dated 23 September 2025 (Worley Consulting)</p> <p>Water Quality Management Sub-Plan Eden Cruise Wharf Rev 3 17 October 2025 (also updated to include feedback from DPIRD from monitoring report).</p> <p>Harbour Master Instructions Berthing Requirements Eden May 2025</p>	<p>a) Addressed in Section 4, Table 4-1, and Section 5 of the OWQMP</p> <p>b) Addressed in Section 4.9 and Section 5.11. of the OWQMP</p> <p>Following feedback from DPIRD following the consultation on the results of the Water Quality Monitoring Program, the Water Quality Management Sub-plan was revised, and included correspondence from DPIRD. DPIRD supported the inclusion of a statement in the Harbour Master's Instructions (berthing requirements) relating to the minimisation of the use of thrusters to reduce sediment disturbance and the resultant impacts on water quality.</p>	

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
65.	D22	<p>If an exceedance of the environmental parameters identified in the Operational Water Quality Monitoring Program occurs, the Proponent must notify the Planning Secretary and DPI Fisheries as soon as possible and within 24 hours of the identification of the exceedance.</p>	<p>Eden Cruise Wharf Modification 3 to SSI 7734 Operational Water Quality Monitoring Report - Quantum Class Visit Rev 0 (Worley Consulting) dated 19 May 2025.</p> <p>Eden Cruise Ship Facility Operation Compliance Report - 2024/2025 Cruise Season November 2025.</p>	<p>No exceedances have been reported. Port Authority commits to monitor further when the 60- cruise ships visit threshold is to be reached.</p> <p>The 2024/2025 Operational Compliance Report notes that : <i>"There were no exceedances of the environmental parameters identified in the Operational Water Quality Monitoring Program in the 2024/25 cruise season"</i>.</p> <p>Whilst the Operational Compliance Reports note that there have been no exceedances, the Water Quality Monitoring Program and Water Quality Management Sub-Plan do not adequately define what constitutes an exceedance.</p> <p>The Water Quality Monitoring Program and Water Quality Monitoring Report do not mention Conditions D22 to D25, which primarily relate to actions that need to be taken in the event of an exceedance.</p> <p>It is recommended that Port Authority consult with authors of the Water Quality Monitoring program and reports (Worley) to clarify what would trigger an exceedance and specific actions required to address the requirements of Conditions D22 to D25 regarding what actions are required should an exceedance occur.</p> <p>Once clarified, Port Authority should update the Water Quality Management Sub-Plan.</p>	Compliant OBS
		<p>This notification must provide details of the circumstances of the event, including:</p>		<p>The following parameters are defined in the monitoring report: In-situ - Dissolved oxygen (5mg/L), pH (8-8.4), Turbidity (NTU) / TSS (extrapolated from turbidity correlation if possible) (10 mg/L)</p>	
		<p>(a) the nature of the event;</p>			
		<p>(b) the parameters that were exceeded;</p>			
		<p>(c) the timing and duration of the event; and (d) the measures employed to minimise the exceedance.</p>			

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
66.	D23	<p>Following a notification of an exceedance of environmental parameters (as required by Condition D22), the Planning Secretary may direct the Proponent to prepare a Report on Environmental Parameter Exceedance and submit it to the Planning Secretary within the time frame specified by the Planning Secretary. The Report must detail the cause and major contributor of the exceedance, the effectiveness of any action(s) taken in response the exceedance and the options available to prevent recurrence.</p>		<p>There have been no formal notifications of an exceedance</p>	<p>Not triggered</p>
67.	D24	<p>OPERATIONAL MONITORING REPORT</p> <p>An Operational Monitoring Report(s) must be submitted to the Planning Secretary upon request, and to the relevant authorities and Council (listed in Condition D16 and D19) <u>within 3 months of the monitoring being completed</u> for each event identified within the Operational Monitoring Program. The Operational Monitoring Report must include:</p>	<p>Eden Cruise Wharf Modification 3 to SSI 7734 Operational Water Quality Monitoring Report - Quantum Class Visit Rev 0 (Worley Consulting) dated 19 May 2025.</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Final Report 29 October 2025 covering monitoring period 2024/2025 to 28 May 2025.</p> <p>Email from Port Authority to BVSC dated 4 November 2025 - <i>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Final Report</i> providing links to the website where the reports can be found and contextual information.</p> <p>Email to DPIRD - : Eden Mod 3 Operational Water Quality Monitoring Program dated 16 Oct 2025 noting outcomes</p> <p>Post Approval Form (17/02/2025) Eden Breakwater Wharf Extension - SSI-7734-PA-20 - Eden Cruise Ship Facility Five-Yr OCSR - submission of 5-year Compliance Summary Report, 2023/2024 Operational Compliance Report and 2023/24 Air Quality Operational Monitoring Report required by Condition D12 and D13.</p> <p>Post Approval Form (23/10/2025) Eden Breakwater Wharf Extension - SSI-7734-PA-21 - Eden Mod 3</p>	<p>Air Quality Monitoring (Non-compliant): The arrival of the Ovation of the Seas, on 22 February 2025 triggered Air Quality Monitoring for a Quantum class event (condition D17.b). The Operational Air Quality Monitoring Report – Quantum class event was finalised on 29 October 2025 and provided to BVSC on 4 November 2025. This is noted to be approximately 5 months from the end of the monitoring period which extended to 28 May 2025 to cover the entire cruise season.</p> <p>The late submission of the Operational Air Quality Monitoring Report was self-reported in the 2024 / 2025 Operational Compliance Report Nov 2025.</p> <p>Water Quality Monitoring: (Compliant)</p> <p>The Operational Water Quality Monitoring Report – Quantum class event (finalised 19 May 2025) was provided to DPIRD Fisheries (in accordance with condition D19) on 4 June 2025, within 3 months of the monitoring being completed for the Quantum class event, on 22 February 2025.</p>	<p>Non-compliant</p>

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		(a) a summary of the results of Operational Monitoring Program(s);	<p>updated WQ Sub Plan & Monitoring Program - Water Quality Monitoring Program Revised Final, Rev 2, 23/09/2025 (attached). Added options 1C and 1D, in the vicinity of WQ1; updated Section 5.6, Figure 5.1 and Appendix C – consultation.</p> <p>Water Quality Management Sub-Plan Eden Cruise Wharf Rev 3 17 October 2025 (also updated to include feedback from DPIRD from monitoring report).</p> <p>Eden Cruise Ship Facility Operation Compliance Report 2024/2025 Cruise Season - Port Authority 18 November 2025.</p>	<p>a) Section 4 of the Water Quality Monitoring Report - Discussion, includes a review of monitoring results in relation to the performance of the SSI:</p> <p>a) Air Quality: Summary results are included in Section 7 - Data Analysis, and summary of findings are included in Section 9 - Conclusions and in the Executive Summary</p>	Compliant
		(b) identification of additional mitigation measures required (where results of monitoring are unsatisfactory or where environmental parameters are exceeded); and	<p>Harbour Master Instructions Berthing Requirements Eden May 2025</p>	<p>b) Water Quality: Mitigation of impacts on Posidonia, macroalgae and reefs from TSS is discussed in the Executive Summary and Section 4 stating: "<i>Where practicable minimise the power and duration that thrusters are used, especially in the berth box, to reduce sediment resuspension and the resultant impacts on water quality and sensitive ecological communities within the Port of Eden</i>".</p> <p>This requirement has been included in the Harbour Master Instructions Berthing Requirements (May 2025)</p> <p>b) Air Quality: Section 9 of the Air Quality Monitoring Final Report - Conclusion notes that no exceedances were recorded during the monitoring period for So2 and NO2, however PM25 criteria were exceeded, - potentially influenced by elevated regional background particulate levels. No further mitigation measures were proposed.</p>	Compliant
		(c) timeframes for the implementation of the proposed measures.		<p>c) Water Quality: Though no specific timelines are proposed for the implementation of the above water quality measure, it is implied that the minimisation of power and duration of the use of thrusters would be an ongoing measure as reflected in the Harbour Master's Instructions Berthing Requirements.</p> <p>C) Air Quality: No specific measures were proposed.</p>	Compliant

ID	CoA No.	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<p>The recommendations identified must be implemented as part of the SSI in the timeframes outlined in the Operational Monitoring Report. Additional mitigation measures must be included in the relevant OEMP Sub-plan.</p>		<p>The Water Quality Management Sub-plan was updated in October 2025 to address the outcomes of the Operational Water Quality Monitoring Report. In addition, the Harbour Master's Berthing Requirements document was revised to include additional measures recommended by DPIRD</p> <p>No updates were required of the Air Quality Management Plan as no new mitigation measures were required.</p>	Compliant
68.	D25	<p>If an Operational Monitoring Report identifies an exceedance of parameters that cannot be mitigated following the implementation of mitigation measures, the Proponent must write to the Planning Secretary within 30 days of the completion of the Operational Monitoring Report and identify how any non-compliant operations would be prevented from reoccurring to ensure compliance with the environmental parameters identified in the Operational Monitoring Program. The Planning Secretary may require the Operational Monitoring Program(s) to be updated and re-submitted for approval.</p> <p>Note: The intent of this condition is to address systemic issues and not respond to a single non-compliance.</p>		<p>As previously noted, no formal exceedances were identified. Some results in the Water Quality Monitoring reports showing elevated turbidity did not present as a systemic issue, therefore this Condition is determined as not triggered.</p>	Not triggered

9.4. AUDIT TABLE 4 –Schedule 2 - PART E – Key Issue Conditions

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			KEY ISSUE CONDITIONS			
	E1		Condition deleted following approval of MOD 3			NA
69.	E2		In addition to the performance outcomes, commitments and mitigation measures specified in the documents listed in Conditions A1(c), all reasonably practicable measures must be implemented to minimise noise impacts and the emission of air pollutants during Operation of the SSI.	Site inspection Interview with the Senior Community and Stakeholder Engagement Advisor (online) and SECO (on site during site inspection)	<p>The site inspection on the day of the arrival of the Anthem of the Seas (Quantum Class cruise ship) did not identify any issues relating to noise. There was no excessive smoke from the stack at the time of arrival, while stationary or when departing.</p> <p>It was noted that the forklift used to assist in securing docking ropes had beepers for reversing. Though the usage was during normal operational hours, consideration could be given to fitting non-tonal "quackers" to minimise noise emissions (used at around 7.30am). Also see implementation of Noise OEMP sub-plan section under Condition E8</p> <p>Some noise complaints were reported in 2024 / 2025 relating music, announcements and games. The complaints have been investigated and actioned - also refer to Complaints section.</p> <p>Whilst some noise complaints have been received, practical measures appear to be in place, and when complaints are received, they have been quickly communicated and actioned.</p>	Compliant Opportunity for Improvement
70.	E3 – E4		DILAPIDATION REPORT Not applicable to operation.		Not triggered for Operation	Not triggered
71.	E5 - E6		TRAFFIC, TRANSPORT AND ACCESS Not applicable to Operation		Not triggered for Operation	Not triggered

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
72.	E7		The Traffic, Transport and Access OEMP Sub-plan must include detail on the provision of infrastructure, facilities and services to cater for cruise ship passengers and ensure safe access including:	Traffic, Transport and Access Sub-Plan (TTAMP) Eden Cruise Wharf September 2024 - by Port Authority NSW	The TTAMP is an update of the original sub-plan and addresses the requirements of MOD 3 (which allows the use of the wharf by cruise and non-cruise ships up to 370 in length). Overall, Section 7 addresses the requirements a) to f).	Complaint
			(a) pedestrian access to Eden Town Centre and Port of Eden retail areas;		Addressed in Section 5.3.1 - Existing Transport Infrastructure and Section 7.6 - Pedestrian Activity	
			(b) pedestrian access to tourist facilities and other local businesses;		Addressed in Section 7.6 - Pedestrian Activity	
			(c) passenger transport services for visits to local and regional businesses and attractions;		Addressed in Section 7	
			(d) shuttle bus routes for Quantum and Oasis class vessels;		Addressed in Section 7.1.2	
			(e) bus parking bays, waiting areas, shelters, signage and the like at the wharf and at pick up points in the local area; and		Addressed in Section 7.6 - Pedestrian Activity	
			(f) provision of personnel to oversee pedestrian movements on the wharf and surrounding areas during cruise ship visits.		Addressed in Section 7.6 - Pedestrian Activity	
73.	E7A		Shuttle buses servicing Quantum and Oasis class (or equivalent) vessels must not use the Barclay Street/Princes Highway intersection, unless agreed to by the relevant road authority.		Addressed in Section 7.1.2. Whilst this requirement was included in the Traffic, Transport and Access OEMP Sub-plan, key Port Authority staff members, transport coordination volunteers and bus company personnel were not aware of this requirement. It was confirmed however, that Barclay Street / Princes Highway intersection has not been used to date when the Quantum class vessels have visited,). Recommendation - Update the Eden Induction prior to the next scheduled Quantum cruise ship visit (Nov 2026).	Observation

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
74.		TTA sub plan 6.3 2024	Traffic Control Plans (TCP) have been prepared to manage cruise day operations, specifically to safely manage pedestrian and traffic during cruise days (refer Figures 14 and 15). The TCP's will be implemented by a suitably qualified contractor and are based upon TfNSW's Traffic Control at Worksites and AS1742.3:2021.	Traffic, Transport and Access Sub-Plan (TTAMP) Eden Cruise Wharf September 2024 - by Port Authority NSW	<p>A Traffic control Plan is included as Figure 14 in the TTA Sub-Plan</p> <p>The site inspection found that pedestrians and traffic were effectively managed on the day of the site visit.</p> <p>Evidence was provided that Traffic Controllers have the required SafeWork NSW traffic control work training accreditation.</p>	Compliant
			TfNSW Accredited Traffic Controllers will be used during the implementation of the TCPs where required in order to manage both pedestrian and vehicular traffic travelling to and from Eden Cruise Wharf.	Work Health and Safety Traffic Control Work Card for John G – Card No TCT 1078140.		
			The duration and implementation of the TCPs will occur on every cruise ship day to effectively manage public road and pedestrian users. The typical hours of implementation of traffic control will occur from 7:00am to 6:00pm.			
75.		TTA sub plan 7.1	<p>Inspection checklist (Appendix A of TTA sub plan) completed by SECO? for drop off and pick up point locations on Cruise Ship Days?</p> <p>Following the inspection, flags and signage will be erected at the locations to indicate bus locations to passengers and direct pedestrian traffic. In addition, Welcome Ambassadors will be at these locations to provide any information to passengers, to ensure safe and easy access.</p>	Site Inspection Completed Port Authority Site Inspection Checklist	<p>The site inspection confirmed that following the inspection, flags and signage were erected to indicate bus locations and direct pedestrians.</p> <p>It was noted that improved pedestrian management was implemented since the last audit. Additional portable flagging was installed to better direct pedestrians away from "no go" areas - refer to photos in the report.</p>	Compliant
76.		TTA sub plan 7.4 Tbl 6	<p>Forklift safety on cruise ship days:</p> <ul style="list-style-type: none"> • Separation from pedestrians? • Temporary signage identifying forklift use – facing pedestrian routes? • Spotter used around pedestrian walking route; • Operate with good line of sight, travelling forward with loads? • Max 5 km/hr speed limit adhered to? • Loading area clear of slip and trip hazards? 	Site inspection	A forklift was used for mooring operations for the cruise ships to minimise manual handling risk. All forklift operations were undertaken in a safe manner in line with these requirements. The forklift was only used for a short time prior to disembarkation and after completion of embarkation at the end of the day - no pedestrians were permitted to be in the forklift operational area.	Compliant

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<ul style="list-style-type: none"> Exclusion zone using temp bollards and barriers to separate pedestrians from work area minimum clear walking width of 2.0m? 			
77.		TTA sub plan 9.1 2024	Regular inspections of the Eden Cruise Wharf operations will be undertaken by Port Authority's on-site personnel involving a walk-over of the land-based areas of the Facility (while ships are at berth). The SECO will undertake inspections of shuttle bus stops prior to cruise visits as discussed in Section 7.1.3.	Site inspection Site inspection undertaken by the Port Authority SECO.	The Auditor accompanied the SECO on the site inspection and it was confirmed that all relevant aspects of the TTA Sup-plan were covered.	Compliant
78.	E8		<p>NOISE AND VIBRATION</p> <p>The SSI is to be constructed and operated to minimise noise impacts on surrounding residents.</p>	Site inspection Port Authority Site Inspection reports	The Anthem of the Seas was observed to turn off motors once docked. No undue noise was being generated.	Compliant
79.	E9 – E16		Construction hours and night time dredging protocol– not applicable to Operations		Conditions E9 to E16 are applicable only to construction, not operations and are therefore not triggered at this audit.	Not triggered
80.	E17		The Noise Management OEMP Sub-plan must identify measures to reduce noise impacts on Sensitive Receivers including:	Noise Management Sub-Plan (NMP) Eden Cruise Wharf September 2024. Harbour Master's Berthing Requirements - Anthem of the Seas	The NMP is an update of the original plan, and includes all the requirements of MOD 3. Addressed in Table 11 - Noise Management Measures. The Harbour Master's Berthing Requirements document is provided to the Cruise Ship / Shipping Agents and sets out the requirements which includes the statement "No deck announcements and / or music from open decks are allowed from cruise ships whilst at the Facility, with the exception of safety announcements relating to necessary passenger information (e.g. access information, quarantine requirements, warnings and emergencies, etc.)"	Compliant
			(a) no deck announcements and music from open decks while berthed at the Breakwater Wharf Extension, with the exception of safety announcements;	Site Inspection Interview with SECO	Refer to Table 5 - for OEMP Implementation outcomes	Compliant

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			(b) ship engine, generator, exhaust and ventilation systems including air conditioning must be maintained and operated efficiently to reduce noise emissions while in the Port of Eden;	Harbour Master's Berthing Requirements - Anthem of the Seas	The Harbour Master's Berthing Requirements document is provided to the Cruise Ship / Shipping Agents and sets out the requirements which includes the statement: "Noise generated from ship related activities must meet or be below the noise management levels presented in Section 4.3 of the Noise OEMP Sub-plan,"	Compliant
			(c) ships must run on the minimum generator/engine power required while at the berth; and	Harbour Master's Berthing Requirements - Anthem of the Seas	Addressed in Table 11 of the NMP - Noise Management Measures The Harbour Master's Berthing Requirements document is provided to the Cruise Ship / Shipping Agents and sets out the requirements which includes the statement: "Ships must run on the minimum generator/engine power required while at the berth"	Compliant
			(e) a procedure for management of non-compliant cruise ships including details on proposed actions, timeframes and consequences in the event of non-compliance with (a) to (c) in this condition.	Noise Management Sub-Plan (NMP) Eden Cruise Wharf September 2024. Interview with SECO	Addressed in Section 4.2 of the NMP - Procedure for Non-Compliant Cruise Ships	Compliant
81.	E18		Where a complaint is received from a Sensitive Receiver in relation to a specific cruise ship at the Breakwater Wharf Extension, the source and nature of the noise must be investigated while the ship is at berth (unless this is not possible due to the timing of the complaint or imminent departure of the ship) and corrective actions implemented as required. If there are further complaints or the investigation indicates ongoing exceedance of the noise levels predicted in the documents listed in Condition A1(c) on the return of the cruise ship, future visits must be managed in accordance with the requirements of the Noise Management OEMP Sub-plan and specific actions, timeframes and consequences agreed by the Planning Secretary in the event of repeat non-compliance.	Interview with SECO Complaints Register (extract from Consultation Manager")	Six (6) Complaints relating to cruise ships have been received since the last IEA, 5 of which were in 2025 and one in November 2024. The source and nature of the complaints are included in the Complaints Register (an extract from Consultation Manager). It was advised that the complaints are received at the Eden wharf almost immediately, and actions were taken as soon as the complaint was received - this primarily involved contacting the ship's agent to cease the activity (reduce noise or turn off the music). To date, there have been no repeat offenders (complaints related to different cruise ships)	Compliant

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
82.	E18A		<p>E18A The Proponent must prepare a Cruise Noise Mitigation Plan (CNMP) to identify the mitigation for operational noise that would be implemented for scheduled overnight berthing of cruise ships. The CNMP must:</p> <p>(a) identify the appropriate project noise trigger levels (as per the NSW Noise Policy for Industry (EPA, 2017)) that are applicable to the night-time period for the overnight berthing of cruise ships, including consideration of the predicted operational noise levels;</p> <p>(b) consider the impacts of low-frequency noise on the predicted impacts identified in the Noise Assessment Report (Appendix C2 of the Modification Report) as listed in Condition A1(c)(ix);</p> <p>(c) investigate and identify noise mitigation measures required to address noise exceedances above the project noise trigger levels;</p> <p>(d) review any residual impacts from the operations associated with Modification 3.</p> <p>The CNMP must be verified by an independent acoustic expert. The CNMP must be made publicly available prior to the first scheduled overnight berthing of a cruise ship. Identified noise mitigation measures must be implemented prior to the scheduled overnight berthing of cruise ships.</p>	Operational Environmental Management Plan Eden Cruise Wharf September 2024	<p>The current OEMP notes that scheduled overnight berthing of cruise ship, cruise ship season with more than 60 vessels or Oasis class equivalent ship visits are not anticipated in the short to medium term and therefore a Cruise Noise Mitigation Plan is not likely to be triggered in the short or medium term. It was confirmed during the site visit that no scheduled overnight berthing has occurred.</p> <p>There is no scheduled berthing overnight over the next 3 years. There is a budget for preparing the plan once required.</p>	Not triggered
83.	E18B		The CNMP must be reviewed and updated every ten (10) years, unless otherwise agreed to by the Planning Secretary.	As above		Not triggered
84.	E18C		<p>OPERATIONAL NOISE MONITORING</p> <p>The Proponent must undertake monitoring of operational noise to compare actual noise performance of Modification 3 against the noise performance predicted for the following scenarios:</p> <p>(a) the first scheduled overnight berthing of a cruise ship;</p> <p>(b) the first scheduled overnight berthing of a Quantum Class (or equivalent);</p>	Interviews with Port Authority management	This condition has not yet been triggered - there have been no scheduled overnight berthings.	Not triggered

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<p>(c) the first scheduled overnight berthing of an Oasis Class (or equivalent); and</p> <p>(d) the first berthing of a large non-cruise ship over 325m LOA.</p> <p>The noise monitoring must be undertaken in accordance with the EPA's Approved methods for Measurement and Analysis of Environmental Noise in NSW (EPA, 2022).</p>			
85.	E18D		<p>OPERATIONAL NOISE COMPLIANCE REPORT</p> <p>An Operational Noise Compliance Report (ONCR) must be prepared to document the findings of the operation noise monitoring carried out under Condition E18C. The ONCR must address the following:</p> <p>(a) compliance with the operational noise levels predicted in noise assessment;</p> <p>(b) methodology, location and frequency of noise monitoring undertaken, including monitoring sites at which noise levels are ascertained, with specific reference to locations indicative of impacts on receivers;</p> <p>(c) any recalibrations, if required, of the noise model taking into consideration factors such as noise monitoring;</p> <p>(d) an assessment of the performance and effectiveness of applied noise mitigation measures together with a review and if necessary, reassessment of mitigation measures; and</p> <p>(e) identification of additional measures to those identified in the CNMP (required by Condition E18A) and reported to the Planning Secretary.</p> <p>The Operational Noise Compliance Report must be finalised within 90 days of completing the operational noise monitoring for each scenario and made publicly available.</p>	Interviews with Port Authority management	As above	Not triggered
86.		Noise OEMP 2.3.3	NOISE AND VISUAL AMENITY	Site Inspection Interview with the Harbour Master	The Harbour Master advised that no sewer, waste or sullage has been unloaded. The site	Not triggered

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			Any loading/unloading or other operations, such as refuelling and general vessel maintenance and servicing (including sewer, waste and sullage offload) will be undertaken between 7:00am and 10:00pm.		inspection did not identify any unloading operations being undertaken It was advised that this would be possible with non-cruise ships, however this has not yet occurred.	
87.	E19		<p>AIR QUALITY</p> <p>The SSI is to be operated to:</p> <p>(a) minimise the risk to Sensitive Receivers from adverse health impacts from exposure to cruise ship emissions;</p> <p>(b) support management strategies to reduce exposure; and</p> <p>(c) national environmental protection standards (as revised from time to time) set out in the National Environment Protection (Ambient Air Quality) Measure.</p>	<p>Eden Air Quality Reports (located on Port Authority Website: https://www.portauthoritiesnsw.com.au/sustainability-and-heritage/environment/eden-air-quality-monitoring)</p> <p>2024 - 2025 Quarterly Reports: * Oct-Dec 2024; * Jan- Mar 2025; * April-May 2025; * Final Report 2025 (29 Oct 2025) (GHD)</p>	<p>Port Authority of NSW implemented an air quality monitoring program at Eden Cruise Ship Facility, Port of Eden, NSW for a period of seven months between October 2024 to May 2025.</p> <p>One of the aims of the air quality monitoring program was to provide data to assess the ambient air quality environment against the relevant standards, alongside a comparison with previous measurements at Port of Eden.</p> <p>The Final Report 2025 notes that the assessment criteria for the project were predominately taken from the Approved Methods, with the exception of PM2.5 which was sourced from the Air NEPM air quality objectives as they represent the most recent and stringent standards for protection of the air quality environment.</p>	Compliant
88.	E20		<p>The OEMP Air Quality Management OEMP Sub-plan must include the following measures to reduce emissions from cruise ships:</p> <p>(a) prior to 1 January 2020:</p> <p>i. no more than 20 cruise ship visits to the Breakwater Wharf Extension (which represents the “typical operations” modelled in the Refined SO2 Emission Modelling); and</p>	Air Quality Management Sub Plan Eden Cruise Wharf Sub-Plan 2024	Measures required prior to 1 January 2020 are addressed in Section 2.3 of the original Air Quality Management OEMP Sub-plan	Compliant
			<p>ii. emissions from cruise ships berthed at the Breakwater Wharf Extension must not result in an exceedance of the maximum cumulative SO2 concentration at the most affected sensitive receiver as predicted in the Refined SO2 Emission Modelling for “typical operations”;</p>	<p>2024 - 2025 Quarterly Reports: * Oct-Dec 2024; * Jan- Mar 2025; * April-May 2025; * Final Report 2025 (29 Oct 2025) (GHD)</p>	<p>Air quality monitoring data from October 2024 to May 2025 was compared with predictions from the Refined SO₂ Modelling for Typical Operations and the MOD 3 Air Quality Impact Assessment in the Final Air Quality Report Oct 2025.</p> <p>The final Air Quality Report noted that SO₂</p>	Compliant

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
					levels were significantly lower than both modelling scenarios	
			(b) from 1 January 2020, cruise ships must meet emission restrictions specified under MARPOL Annex VI, as implemented through the relevant Maritime Acts, or more stringent emission restrictions under these Acts;	<p>Air Quality Management Sub Plan Eden Cruise Wharf Sub-Plan 2024</p> <p>Eden Air Quality Reports (located on Port Authority Website: https://www.portauthoritynsw.com.au/sustainability-and-heritage/environment/eden-air-quality-monitoring</p> <p>2024 - 2025 Quarterly Reports: * Oct-Dec 2024; * Jan- Mar 2025; * April-May 2025; * Final Report 2025 (29 Oct 2025) (GHD)</p> <p>Harbour Master's Berthing Requirements - Anthem of the Seas</p>	<p>Section 5.2 of the Air Quality Management Sub-Plan addresses the requirement under Annex VI that from Jan 2020, sulphur content of the fuel must not exceed 0.5%, noting that compliance may be achieved via other means such as by use of scrubbers to meet same outcome. Section 4.2.3 provides the procedures for dealing with cruise ships that are non-compliant with air quality requirements. Cruise Ship operators are required to comply with the AQMP.</p> <p>The Harbour Master's Berthing Requirements include Cruise Ship Environmental Requirements including Air Quality - MARPOL requirements. It was advised that these are provided to the Ship's agents.</p>	Compliant
			(c) ship engine, generator, exhaust and ventilation systems must be maintained and operated efficiently to reduce air emissions while at berth at the Breakwater Wharf Extension; and	Air Quality Management Sub Plan Eden Cruise Wharf Sub-Plan 2024	Requirements are identified in section 4.2.3 of the Air Quality Management OEMP Sub-plan - Air Quality Procedure for Non-Complaint Cruise Ships	Compliant
			(d) a procedure for management of non-compliant cruise ships including details on proposed actions, timeframes and consequences in the event of non-compliance with (a) ii, (b) and (c) in this condition.	Air Quality Management Sub Plan Eden Cruise Wharf Sub-Plan 2024	<p>Requirements are identified in section 4.2.3 of the Air Quality Management OEMP Sub-plan - Air Quality Procedure for Non-Complaint Cruise Ships.</p> <p>It was advised that there have been no reports of non-compliant ships.</p>	Compliant

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
89.	E21		<p>Unless otherwise agreed with the Planning Secretary, the Operation Monitoring Program required under Condition D7 must, as a minimum, include monitoring of NO2, SO2 and PM2.5 at the closest potentially impacted sensitive receiver (taking into account prevailing winds) at least two days prior to the arrival of the first three cruise ship of the season, while they are at berth and for at least two days following departure.</p>	<p>Operational Air Quality Monitoring Program Eden Cruise Wharf July 2024</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Final Report (GHD for Port Authority) dated 29 Oct 2025</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Report (GHD for Port Authority) – April to May 2025 dated 29 Oct 2025</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Report (GHD for Port Authority) – January to March 2025 dated 29 Oct 2025</p> <p>Port of Eden Air Quality Monitoring Program Air Quality Monitoring Report – October to December 2024 dated 30 April 2025</p> <p>Monthly Ambient Air Quality Monitoring Reports (4) 2024:</p> <ul style="list-style-type: none"> * April 2024 - Ektimo dated 12 September 2024 * March 2024 - Ektimo dated 12 September 2024 * Feb 2024 - Ektimo dated 12 September 2024 * Jan 2024 - Ektimo dated 12 September 2024 	<p>The parameters measured as part of the air quality monitoring program included wind speed, wind direction, PM2.5, NO2, and SO2 concentrations.</p>	Compliant
		<p>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.</p>	<p>The Air Quality Monitoring Final Report presents the analysis of monthly data collected by the Air Quality Monitoring Station (AQMS) located at Port of Eden, 8 By Street, Eden, NSW 2551. The AQMS operated from 22 October 2024 until its decommissioning on 28 May 2025.</p> <p>Air quality monitoring encompassed a broader monitoring program to cover the whole cruise season of 7 months not only the days before and after cruise ship arrival and departure.</p>			
90.		OEMP 7.5	<p>Air Quality monitoring requirements:</p> <p>Air quality will be visually monitored for black / dark smoke emission and monitored for noticeable odours during Eden Cruise Wharf operations.</p>	<p>Site Inspection Port Authority Site Inspection checklist</p>	<p>The inspection checklist includes a question relating to the emission of black or dark smoke or odours.</p>	Compliant

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
91.	E22		Where a complaint is received from a Sensitive Receiver in relation to a specific cruise ship at the Breakwater Wharf Extension about dark smoke emissions or offensive odours, the source and nature of the dark smoke emission or offensive odour must be investigated in accordance with the Complaints Procedure in the OEMP and the procedure for non-compliant ships under the Air Quality OEMP Sub-Plan, and actions undertaken in accordance with these procedures.	Complaints Register	No complaints were recorded in the complaints register about dark smoke emissions of offensive odour, therefore this condition is not triggered.	Not triggered
92.	E23 OEMP 6.4		LIGHTING All maritime lighting to be implemented as part of the SSI shall have regard to the location of nearby residential dwellings. Lighting impacts shall be minimised to the extent possible and comply with AS 4282:1997 – Control of the Obtrusive Effects of Outdoor Lighting and relevant Australian Standards in the series AS/NZ 1158 – Lighting for Roads and Public Spaces.	Site inspection Wharf Extension – Basis of Design 22 Sept 2016 by Worley Parsons – section 1.5.3 – lighting services (doesn't mention AS428 or AS/NZ 11582).	As per the previous IEA it could not be verified that the lighting design was based on AS4282 or AS/NZS 1158, however based on site observations, the lighting at the cruise wharf appeared to be compliant.	Compliant
93.	E24		SOCIAL The Proponent must prepare and implement a Social Impact Management Plan (SIMP) to guide the management, monitoring, reporting and rectification of social impacts during operation. The SIMP must be submitted to the Planning Secretary for approval at least three (3) months prior to the commencement of the first cruise season with more than 60 cruise ship visits is expected to occur.	Interviews with Port Authority Management	This condition has not yet been triggered - the threshold of 60 cruise ships in a season has not been reached. It is anticipated that there will be no more than 30 cruise ships this season	Not triggered
94.		OEMP 7.1	Socio Economic			Not triggered

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<p>Prior to the first visit of an Oasis Class vessel (or vessel greater than 5,000 passengers) a pre-visit planning workshop with relevant industry representation (including NPWS) will be facilitated by Port Authority to prepare for the visit, including consideration of mitigation measures to address impacts that are specific to this larger vessel. This will include an analysis of additional social infrastructure, such as public toilets, required to accommodate the increased number of passengers that these vessels will bring. (Note: visitation by the larger cruise ships (e.g., Oasis Class) will likely occur in a gradual manner). Further, the larger vessels cannot visit the Port until additional infrastructure mooring dolphin) is constructed).</p>	<p>Interviews with Port Authority Management</p>	<p>This condition has not yet been triggered - no Oasis class ships are anticipated to visit in near future</p>	
95.	E25		<p>The SIMP must be prepared:</p> <p>(a) in accordance with the Social Impact Assessment Guideline (DPE) by suitably qualified and experienced person(s) in the social sciences in accordance with Appendix B of the Social Impact Assessment Guideline (DPE); and</p>		<p>This condition has not yet been triggered - see condition E24</p>	Not triggered
96.	E26		<p>The SIMP must include specific details of the commitments, targets, programs and timing to secure and enhance positive social outcomes associated with the SSI, including:</p> <p>(a) revisions to or refinement of the assessment of social impacts and risks;</p> <p>(b) additional mitigation measures to address social impacts based on those committed to in the documents listed in Condition A1(c);</p> <p>(c) details of how measures will be targeted and adapted to meet the needs of affected communities;</p> <p>(d) a monitoring program, prepared in accordance with Section 5.2 of the Social Impact Assessment Guideline (DPE), to:</p>		<p>This condition has not yet been triggered - see condition E24</p>	Not triggered

ID	CoA No	OEMP Ref	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
			<ul style="list-style-type: none"> i. monitor, review, and report on the effectiveness of the identified measures; ii. report on community engagement and complaints in relation to social issues; and iii. report on adaptative management measures implemented or proposed. 			
97.	E27		The SIMP must be updated with involvement of community and stakeholders every ten (10) years, unless otherwise agreed to by the Planning Secretary.		This condition has not yet been triggered - see condition E24	Not triggered

9.5. AUDIT TABLE 5 - OEMP Implementation

(Note: where requirement is related specifically to a CoA, requirement is included in the CoA tables, in rows adjacent to the CoA Condition)

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
	OEMP				
97.	4.2.1	<p>Site Specific Induction</p> <p>Port Authority has developed an induction specific to the Eden Cruise Wharf. The induction is compulsory to all employees and contractors using or working in the Eden Cruise Wharf. Induction refreshers are required on a bi-annual basis. Key elements of the induction include:</p> <ul style="list-style-type: none"> • A summary of key environmental risks associated with the operation with the Eden Cruise Wharf • The requirement for mandatory compliance with the Infrastructure Approval and this OEMP • Key operational and safety requirements 	<p>Rapid Global - downloaded PDF version: Welcome to the Eden Cruise Ship Facility Induction</p> <p>Key environmental topics include:</p>	<p>The site-specific induction is compulsory (Auditor was required to undertake prior to coming onto site). The following topics were covered:</p> <ul style="list-style-type: none"> Emergency Spill Equipment Hazardous substances; Pedestrian and Traffic Management; Operational Environmental Management Plan and related subplans - required to read, understand and comply; Environmental awareness - includes reporting of environmental incidents Complaints process <p>The induction material appears adequate and appropriate for the level of risk.</p>	Compliant
98.	4.2.2	<p>Environmental Training</p> <p>In addition to the site-specific induction, Port Authority requires its employees and contractors to undertake a number of environmental related training modules. The MyRapid Portal is Port Authority's centralised induction and training program for personnel and contractors.</p> <p>Port Authority has developed easily accessible, online training modules on environmental management for both site and office personnel. In addition to a general Environmental and Sustainability Induction, the following issue-specific training modules are available through the on-line training system:</p> <ul style="list-style-type: none"> • Planning Approvals and Other Legal Requirements • Storage and Handling of Hazardous Liquids and Refuelling • Heritage • Environmental Incident Response • Contaminated Land 	<p>Projects Team: Planning, Heritage and Environment Training</p> <p>Emergency Response Training Procedure</p>	<p>The Planning, Heritage and Environment Training material includes information relating to the Planning Approval requirements (covers all Ports - general).</p> <p>The Emergency Response Training Procedure provides descriptions of various training programs in place including NSW Coastal Waters Marine Pollution Plan and National Plan - Maritime Environmental Emergencies AMSA. Mandatory training for Port Officers and Port Service Officers included Introduction to Pollution Response, Intro to Marine Incident Management, Basic Equipment Operators, and Shoreline Response</p>	Compliant

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
99.	5.3	Emergency Contacts and Response The Port Authority has prepared and implemented existing emergency response procedures, including for marine pollution incidents. Port Authority will respond to all port-related incidents within the ports of Eden in accordance with the Port of Eden Marine Oil and Chemical Spill Contingency Plan.	Emergency Response Plan - For the Eden Cruise Berth Snug Cove - Twofold Bay Approval date 07/04/2025.	The Emergency Response Plan provides key information to respond to emergency situations including an Emergency Contact List, scenarios, plans and flowcharts There have been no recorded spills at the Port of Eden since the commencement of Operations.	Compliant
		In addition to responding to marine pollution incidents, Port Authority also investigates the cause of the incident and may prosecute any breaches of the relevant marine pollution legislation.			
100.	7.1	Water and Sediment Quality			
		The following management actions will be implemented:			
101.	7.1	Appropriate waste facilities will be readily accessible for the Operation of the Facility for passenger waste (litter)	Site inspection	The site inspection identified that appropriate waste facilities are readily accessible to passengers on the wharf and at the Welcome Centre (see photos in report)	Compliant
		Marine debris clearing from waters, landside, adjacent to the cruise ship berth and along the foreshore will be undertaken as required;	Site inspection	It was confirmed at the previous audit and at this audit, that marine debris would be cleared as required. It was advised that no clearing of debris has been required since the last audit	Not triggered
		In-water cleaning will only occur on anti-fouling coatings suitable for in-water cleaning (obtainable from coating manufacturer) and in compliance with Anti-fouling and In-water Cleaning Guidelines (DA, 2015) and subject to agreement with relevant authorities including Port Authority, DPIRD -Fisheries and EPA	Interview with Harbour Master.	As noted in the previous audit, no in-water cleaning is permitted in NSW, and it was confirmed that this is not permitted at the Eden Cruise Wharf. The site inspection did not note any cleaning activities.	Compliant
		Any oils and hazardous chemicals will be stored in appropriately bunded and covered storage areas with containment in accordance with the relevant product	Site Inspection	No oils or hazardous substances were stored on the wharf extension or on the Breakwater wharf.	Not triggered

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		Safety Data Sheets and applicable Australian Standards.		An oil store was previously in existence (not part of the Eden Cruise Wharf facility), however it was confirmed that this has now been decommissioned, and no hazardous chemicals or oils are stored at the wharf extension.	
		Emergency spill response equipment within Facility will be available and maintained	Site inspection	Two spill kits were stored inside a cupboard on the side of the security kiosk. These were accessible at all times while the cruise ship was alongside the wharf.	Compliant
		Any required refuelling would continue to be via road tanker and will likely only be required for non-cruise vessels.	Site inspection Interview with Harbour Master	As noted at the 2022 IEA, it was advised that no refuelling of cruise ships occurs at Eden. It was advised that refuelling is undertaken by small vessels only - e.g. fishing boats, tugboats on the breakwater wharf and this would be managed by the tenants such as the ice shop (mini tankers called as required)	Not triggered
		Low Environmental Health and Safety (EHS)-risk cleaning products will be preferentially selected (i.e. biodegradable detergents and dispersants)	Interview with Harbour Master	Cruise ships are not allowed to use any chemicals for cleaning - water only. No cleaning was observed during the site inspection.	Not triggered
		Contaminated bilge water discharges will not be permitted at the Port	Interview with Harbour Master Site inspection	It was advised that bilge water from cruise ships is not discharged at the Port.	Not triggered
		Spills and leaks will be contained in accordance with Port of Eden Marine Oil and Chemical Spill Contingency Plan, the Code of Practice Non-Cargo Oil Transfers in the Port of Eden, and the technical guidelines section of Bunding and Spill Management of the Authorised Officers (EPA's website).	Port of Eden Marine Oil and Chemical Spill Contingency Plan Rev 6 Approved 06/11/2025. Code of Practice Non-Cargo Oil Transfers in the Port of Eden.	It was advised that there have been no spills or leaks recorded.	Not triggered
		Spill response strategy and procedures developed by Port Authority will be followed in the event of a spill, Port Authority will be contacted immediately	Port of Eden Marine Oil and Chemical Spill Contingency Plan Rev 6 Approved 06/11/2025. Code of Practice Non-Cargo Oil Transfers in the Port of Eden.	Appropriate documentation has been developed and is available to manage spills and leaks / marine pollution response and prevention	Compliant
102.	WQ OEMP	WATER AND SEDIMENT QUALITY			TBC

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<p>The Code of Practice Non-Cargo Oil Transfers in the Port of Eden (Issued by the Harbour Master, Eden, Feb 2023 will be implemented for the Eden Cruise Wharf Operations which includes, amongst other items, the following:</p> <ul style="list-style-type: none"> • The Code of Practice covers transfers where a flexible or portable hose is used to transfer fuel oils (such as marine diesel oil and heavy fuel oil), lubricating oils, hydraulic oils, waste oils, oil/water mixtures and oiled bilge water, tank or hold washings and grey water and sewage. • Vessels of 30m or more in length will require an Oil Transfer Permit by the Port of Eden prior to any transfers being conducted. • A port officer will attend operations requiring an Oil Transfer Permit to verify that permit conditions are being complied with • The owner of commercial vessels less than 30m in length and recreational vessels has a duty to act responsibly, take precautions to ensure that the risk of accidental spillage from a fuel oil transfer operation is minimised, and comply with the Requirements of the Code of Practice. A Safety Checklist must be completed prior to commencing transfers. • Oil transfers are only permitted between the hours of sunrise and sunset. In exceptional circumstances the Harbour Master may grant approval for transfers to occur during the hours of darkness if the sea conditions permit, however written approval must have been sought prior. • Any oil spill occurring during transfer operations, no matter how minor, must be immediately reported to the Harbour Master or his/her representative. • Road Tanker operators must coordinate with the owner of ships and vessels prior to any oil transfer. • All non-cargo liquid transfer operations conducted within the Port of Eden are to be recorded and may be audited for compliance by the Harbour Master. 	<p>Code of Practice Non-Cargo Oil Transfers in the Port of Eden (Issued by the Harbour Master, Eden, Rev 6 Approved 30/10/2025.</p> <p>Sampled "Bunker and Oily Waste Transfer – Vessel Checklist and Undertaking" completed forms – 02/02/2024 and 28/04/2024 – Saints A&G</p>	<p>The Code of Practice Non-Cargo Oil Transfers was available at the Welcome Centre /Harbour Master's office and are available on the Port Authority documented system.</p> <p>It was advised that fuel transfers only occur during daylight hours at the Breakwater Wharf, however there no refuelling of cruise ships have occurred to date.</p> <p>It was also advised by the Harbour Master that refuelling of small vessels is undertaken by trained engineers who have been briefed on procedures.</p>	

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<ul style="list-style-type: none"> the Master of the vessel and the person in charge of the tanker truck or pipeline operation, must ensure that all staff involved are provided with a formal training program. All staff are trained in emergency responses. 			
103.	7.1	<p>The following Water Quality monitoring will be undertaken:</p> <ul style="list-style-type: none"> Water quality at the Facility and adjacent areas will be visually monitored on Cruise Ship Days for any visible signs of contamination from sediment or hydrocarbons 	Site Inspection - accompanied the SECO during the Port Authority site inspection. Water quality is visually monitored prior and during the docking of the cruise ship (Anthem of the Seas on the day of the audit)	<p>The auditor accompanied the SECO during the Port Authority site inspection. Water quality is visually monitored prior and during the docking of the cruise ship (Anthem of the Seas on the day of the audit). Outcomes are recorded on the electronic checklist (on smart phone). No issues were identified in regard to water quality.</p> <p>It is noted that there is a concrete apron beneath the berthing area designed to minimise the potential for disturbance of sediments,</p>	Compliant
		If visual monitoring indicates potential contamination additional water and sediment quality monitoring may be implemented	Site Inspection. Interview with Port Authority Environmental Planning Officer, SECO and Harbour Master	Visual monitoring did not indicate any potential contamination	Not triggered
		<p>If water quality monitoring is undertaken, the parameters for analysis will be selected based on the type of contamination observed, e.g.:</p> <p>if significant turbidity is observed, then TDS and turbidity will be measured</p> <p>if an oil chemical spill is observed, then hydrocarbons (TRH) and BTEX will be measured</p> <p>if paint spill is observed, then volatile organic compounds such as toluene, xylene or formaldehyde and solvents will be measured;</p>		As visual monitoring did not identify any potential contamination, additional water quality monitoring (other than the monitoring required under MOD 3 has not been required.	Not triggered
104.	7.2	<p>Ecology</p> <p>To reduce potential water sediment quality impacts on flora and fauna during Operation of the Facility, the following Management Actions will be undertaken:</p>	Harbour Master's Berthing Requirements - Anthem of the Seas	Cruise ship operators are responsible for ensuring compliance with the International Convention for the Prevention of Pollution from Ships (MARPOL).	Not fully verifiable

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		<ul style="list-style-type: none"> All ships at sea will adhere with the amendments to MARPOL Annex V (IMO, 1988) which came into force on 1 March 2018 - this broadly prohibits the discharge of garbage into the sea, excepting in the cases of food wastage, cargo residues, cleaning agents and additives, and animal carcasses. MARPOL is implemented in Australia through the Protection of the Sea (Prevention of Pollution from Ships) Act 1983 		<p>The Harbour Master's Berthing Requirements document is provided to the Cruise ship operator prior to berthing and includes the air quality requirements as per this requirement.</p> <p>The compliance by cruise ships was not fully verifiable at this audit, however the site inspection did not identify any discharge of waste, or cleaning in the port.</p>	
		<p>Ecology</p> <ul style="list-style-type: none"> Risk of vessel strike during operational activities will be reduced through: Education of all personnel Active management such as information exchange by the DMCO to tug and Cruise Ship Operators, on known marine mammal activity (e.g. via community, commercial fishers, mussel farmers, NPWS whale watch and Cat Balou Cruises information) Awareness of the presence of marine fauna in the local waterway by vessel operators so that they can adopt appropriate speeds and clearance when cetaceans are nearby 	<p>Interview with the Harbour Master, Pilot and SECO</p> <p>Eden Port of Passage Plan (available on Port Authority Website)</p>	<p>The Harbour Master / Port Authority pilot escort cruise ships into the harbour and enforce the limit – there have been no reports of excess speed in the port.</p> <p>Port of Passage Plans provide the maximum speed allowable (8 knots) in the outer port area, progressively reducing to 4 knots closer to the wharf - on the day of the audit, the plan showed that the maximum speed within the port was 8 knots, reduced to around 4 knots near the wharf, and this is typical.</p> <p>Any sightings of whales or other mammals are communicated, and relevant personnel interviewed were aware of the risk of vessel strike.</p>	Compliant
		<p>Vessels within the Port will adhere to speeds of 10 knots or less, except in circumstances where the Harbour Master or a Pilot considers that a higher speed is necessary to maintain safe navigation in the Port</p>	<p>Interview with the Port Authority Pilot (Jo).</p>	<p>As noted above, the Port of Passage Plans provide the maximum speed allowable (8 knots). The interview with the Port Authority Pilot confirmed that the maximum speed is per the Port of Passage Plan - 8 knots.</p>	Compliant
		<p>All injured marine mammals will be immediately reported to the ORRCA 24-hour hotline on 02 9415 3333 or NPWS on 1300 361 967</p>	<p>Interview with the Harbour Master.</p>	<p>There have been no reports of injured mammals.</p>	Not triggered

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
		Vessels will manage ballast water in accordance with the Australian Ballast Water Management Requirements (DAWR, 2017)	Interview with the Harbour Master.	It was verbally confirmed by the Harbour Master that ballast water is not discharge in the Port, however, may be by the smaller vessels. Compliance by the smaller vessels could not be confirmed.	Compliant
		The Operator will report any fish kills associated with the Eden Cruise Wharf to DPIRD Fisheries (1800 043 536) immediately and any water-based activities will cease until emergency response procedures are implemented and the issue is rectified and written approval to proceed is provided by DPIRD Fisheries	Interview with SECO and Harbour Master	There have been no known fish kills	Not triggered
105.	7.2	Ecology – Monitoring requirements – Terrestrial and aquatic ecology at the Facility and adjacent areas will be visually monitored on Cruise Ship Days for any visible signs of impacts to biodiversity	Interview with SECO	The inspection checklist includes a section "Aquatic and Terrestrial Ecology" which is completed on Cruise Ship Days. The auditor accompanied the SECO during the site inspection. There were no visible signs of impacts to diversity (none have been reported to date)	Compliant
106.	TTASP	Traffic, Transport and Access	Site Inspection	Safe pedestrian access is provided to the town centre. Additional flagging was provided at the wharf to ensure safe access to the bus waiting areas. Yes - shuttle buses were available for visiting both the Town of Eden and for regional businesses and attractions. On the day of the site visit, a Quantum Class cruise ship visited, and passengers were provided with a shuttle bus to a festival specifically organised for the arrival of the ship at Boydtown. Yes - separate, signposted bus parking bays were utilised at the wharf, and temporary signage was posted in the town for additional stops. Yes - many volunteers were on site to oversee the pedestrian movements and ensure passengers were proceeding to the correct bus stops.	Compliant
107.		* Safe pedestrian access to Eden Town Centre, Port of Eden retail areas, tourist facilities and other local businesses?			
108.		* Passenger transport services for visits to local and regional businesses and attractions?			
109.		* Bus parking bays, waiting areas, shelters at the wharf and pick-up points in the local area?			
110.		* Personnel provided to oversee pedestrian movements on the wharf and surrounding areas during cruise ship visits?			

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
111.	Noise OEMP Table 11 7.4	Noise and Visual amenity monitoring requirements: Eden Cruise Wharf operations and activities (e.g. passenger embarking / disembarking, loading/unloading, maintenance, refuelling, etc) will only be permitted between 7:00am to 10:00pm.	Site Inspection. Interview with Port Authority SECO	It was confirmed that all embarking, disembarking etc occurs only between 7am and 10pm. On the day of the audit, the Anthem of the Seas arrived alongside the Wharf at approximately 7.15am. Passengers disembarked after 7.30am. The cruise ship departed at approximately 15.45.	Compliant
		Noise amenity at the Wharf will be monitored via inspections on Cruise Ship Days when a ship is at berth for deck announcements and/or music. No open deck announcements and music from open decks while berthed at the Eden Cruise Wharf (with the exception of safety or regulatory announcements)	Site Inspection Interview with SECO including SECO site inspection.	The noise amenity is considered as part of the site inspection. On the day of the audit, a short safety announcement was made - no music or other announcements were noted. Some complaints were made in the 2024 / 2025 period relating to music on deck - these were investigated and addressed on the day of the complaints - refer to Complaints section.	Compliant
		Non-tonal or broadband reversing alarms, or 'quackers', will be used on mobile equipment at the berth as required during non-day period out of hours activities.	Site inspection Interviews with forklift operator	It was noted that the forklift used to assist in securing docking ropes had beepers for reversing. Though the usage was during normal operational hours, consideration could be given to fitting non-tonal "quackers" to minimise noise emissions (used at around 7.30am)	Improvement Opportunity
112.	7.6	Waste Management Environmental Action Plan The following Management Actions will be implemented: * Segregated general and recyclable waste receptacles will be provided and utilised during the Operation of the Facility and routinely checked to ensure they are fit for purpose	Site Inspection	General and recyclable waste receptacles were observed to be in place at the Welcome Centre (see photos)	Compliant
		* Maintenance materials including oil and lubricants will be stored in a bunded area	Site Inspection	There were no oils or lubricants stored on the Cruise Wharf	Not triggered

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
113.	7.6	* Large ships (Quantum or Oasis Class equivalent) requiring sewage waste removal will notify to Port Authority the need for sewage removal while at berth one week in advance prior to the ship arrival (Section 2.3.6)	Site Inspection (Quantum class cruise ship Anthem of the Seas was visiting Eden)	It was advised that there have been no requests for sewage waste removal since Quantum Class ships have been visiting Eden (approx. 4 visits (2 in 2024 and 2 to date in 2025)).	Compliant
114.	7.6	Waste Management Monitoring Requirements * Regular maintenance and housekeeping at the Facility will be visually inspected on Cruise Ship Days to evaluate the effectiveness of waste storage and collection	Site Inspection	Waste management and litter is addressed in the daily inspection checklist. The site inspection noted that the facility was neat, tidy and clean at the time of the cruise ship arrival and departure	Compliant
115.	7.7	Greenhouse Gas and Energy Environmental Action Plan The following Management Actions will be implemented: * The potential to generate additional energy at the Facility (such as the use of photo-voltaic lighting) will be considered;	Interview with Environmental Planning Officer	Solar panels had been installed at the Welcome Centre prior to the previous IEA. No further additional measures have been undertaken	Compliant
		* Low energy consumption appliances, equipment and systems will be utilised, where appropriate		The Welcome Centre construction was completed in 2021, and sustainability initiatives included installation of energy efficient LED lighting and installation of solar panels on the roof. There have been no changes since the previous IEA.	Compliant
116.	7.8	Hazards and Risks Environmental Action Plan The following Management Actions will be implemented: * Firefighting equipment will be provided and maintained * A port officer will attend operations requiring an Oil Transfer Permit to verify that permit conditions are being complied with		There is no refuelling of cruise ships at the Eden Wharf - only small ships. It was advised that a permit system is in place - One Port. Manual forms are used for small vessels. Random inspections are undertaken. Tugs with firefighting capabilities were docked at the wharf – see photos.	Compliant

ID	Plan / Section	Description	Evidence Assessed	Outcomes, Findings, Recommendations	Compliance Status
117.	8.3	<p>Inspections Regular environmental inspections of the Eden Cruise Wharf operations will be undertaken by Port Authority's on-site personnel involving a walk-over of the land-based areas of the operating wharf (while ship are at berth).</p> <p>The visual inspections will check (but not limited to) the following:</p> <ul style="list-style-type: none"> • Visible signs of water or sediment contamination and disturbance • Any signs of ecological impact • Any signs of invasive species, including (but not limited to) <i>Clavelina lepadiformis</i> • Unusual noise or emissions to air from Eden Cruise Wharf operations • Traffic congestion caused by Eden Cruise Wharf operations • Presence of litter or waste at the wharf • Presence of chemical containers in un-bunded areas at the wharf 	Electronic Site Inspection Forms Sampled completed inspection forms from MyOSH system	The electronic site inspection forms include these criteria An inspection of the Eden Wharf facility on 14 November 2025 identified music being played at the gangway - this was communicated by phone and SMS, and music was stopped within 40 minutes.	Compliant
118.	8.3	<p>Sea Based Inspections In addition, Port Authority can organise sea-based inspections on a need basis and in response to significant incidents or environmental events (e.g. spills triggering reporting under the POEO Act, confirmed vessel strikes, etc). The need for a sea-based inspection would be determined by the Port Authority's Senior Manager Environment in consultation with the Harbour Master. Sea-based inspections will be documented in the Environmental Incident and Non-Compliance Form.</p>	Interview with Harbour Master, Environmental and Planning Officer	It was advised that there have been no significant events requiring sea-based inspections	Not triggered