

The Australian Human Rights Commission
GPO Box 5218
Sydney NSW 2001
Attention: Pam Foo

Dear Ms Foo

I write in response to your letter of 10 July re Carnival Australia's application for an exemption under section 44 of the Age Discrimination Act 2004 for restrictions on passengers under the age of 19 on the company's cruise ships.

ADCA has prior experience of Carnival Australia and the serious alcohol-related issues that have occurred in relation to "schoolies" travelling on their vessels in peak times marking the ends of school years – most noticeably following HSC or equivalent rites of passage.

ADCA supports Carnival Australia's exemption to have under-19s accompanied by a responsible adult between 1 November and 7 January each year – the peak schoolies period. Similarly, it supports the quota the company nominates for the number of unaccompanied under-19s on any cruise outside that time.

Our support is based on strong evidence against people of this age drinking at the levels often experienced in groups. The National Health and Medical Research Council guidelines on alcohol consumption say that young adults up to the age of 25 should be aware they are at particular risk of harm from alcohol consumption due to a greater risk of accidents and injuries, a lower alcohol tolerance than older adults, and an increased risk of cognitive impairment and alcohol dependence in later life. The guidelines advise that young adults should drink within low-risk levels.

The issue is compounded by the dangers alcohol may pose in the potentially high-risk marine environment. One might make the comparison between the numbers of patrons allowed into a club or hotel on dry land as a condition of a premise's licence and the numbers that should be allowed on board a cruise ship in light of the heightened risk inherent in being at sea. The confined environment on a cruise ship may also impact on other passengers' safety and enjoyment.

We believe that Carnival Australia is attempting to take a responsible attitude while trying to keep its business viable, and support its seeking this exemption.

Yours sincerely



David Templeman
Chief Executive Officer
12 August 2013