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* Associated Firm

21 June 2013

PRIVATE AND CONFIDENTIALHon Susan Ryan AO
Age Discrimination Commissioner
Australian Human Rights Commission
Level 3, 175 Pitt Street
Sydney NSW 2000

Dear Commissioner

**Application by Carnival for Further Exemption under Section 44(2) of the Age
Discrimination Act 2004 (Cth) ("the Act")**

We act for Carnival plc trading as Carnival Australia (**Carnival**), and refer to Carnival's previous application to the Commission for an exemption under section 44(1) of the Act (**Exemption**). This Exemption was granted by the Commission on 21 December 2010. The Exemption commenced on 23 December 2010 for a period of 2.5 years. The Exemption is due to expire on 22 June 2013 (**Expiry Date**).

Our client now seeks a further exemption under section 44(2) of the Act for an additional period of 2.5 years and on the same terms and conditions as the current Exemption (**Further Exemption**).

In seeking the Further Exemption, Carnival does not admit that the Act applies to its operations, to the extent that these operations are conducted on cruise ships which are not within the jurisdiction of the laws of the Commonwealth of Australia. Carnival reserves all of its rights in this respect.

Background**Reasons for Original Application for Exemption**

Carnival is Australia's leading cruise company and represents 7 cruise brands (including P&O Cruises Australia) in the Australian and New Zealand markets.

Prior to obtaining the Exemption, Carnival was experiencing a significant increase in the amount of alcohol-related security incidents involving large numbers of "Schoolies" on its cruises during the traditional Schoolies period of 1 November to 31 January (**Schoolies Period**). These incidents involved serious risks to the health and safety of passengers, crew, and also the Schoolies participants themselves.

Carnival attempted to reduce the number and severity of these incidents by obtaining advice from security experts and implementing stringent security measures. These included:

- * increasing restrictions to the access and consumption of alcohol (including refusing to serve alcohol to persons involved in incidents, de-activating alcohol purchasing cards, providing unique wrist bands to passengers who were above-drinking age, and attempting to police the secondary supply of alcohol).
- * tightening its policies and procedures in relation to the access and consumption of alcohol;
- * enhancing the training and instruction of its crew in relation to the above procedures;
- * increasing its pre-boarding and on-boarding searches for contraband alcohol; and
- * increasing its security numbers and presence.

Despite these measures, Carnival continued to experience a high level of Schoolies alcohol-fuelled incidents. In particular, Schoolies participants continued to find methods of circumventing Carnival's security measures by either smuggling alcohol on board, obtaining alcohol through above-drinking age passengers or drinking to excess before boarding the ship. There were also incidents where Schoolies' participants pre-arranged fights and rioting which had not necessarily been fuelled by alcohol.

These incidents continued even after Carnival made an informed decision to discontinue promoting and operating summer voyages to school-leavers during the Schoolies Period. After 2006, there continued to be high levels of school leavers seeking to book cruises and Carnival continued to experience alcohol-fuelled and other "Schoolies" incidents. Schoolies participants would organise their own large-scale events on Carnival ships through viral emails and messaging.

As a result of the above, Carnival sought an Exemption from the Commission on 7 April 2009 in order to restrict the ability of persons aged under 21 years of age to take part in cruises without a parent or guardian during the Schoolies period of 1 November to 31 January (**Schoolies Period**).

Following significant compromise from Carnival, the Commission granted the Exemption on 21 December 2010 which permitted Carnival to lawfully restrict the ability of persons aged under 19 years of age to take part in cruises without a responsible adult during Schoolies Periods. The reduction in the age limit of Carnival's Exemption to persons aged under 19 years was considered to be appropriate by the Commission in the circumstances and Carnival relies on the reasons published by the Commission as part of its decision of 21 December 2010.

Reasons for Application for Further Exemption

Since the Commission granted the Exemption, Carnival has observed a significant decrease in the number of alcohol-related security incidents during the Schoolies Period.

Carnival is of the view that such a decrease is attributable to the Exemption granted by the Commission in 2010.

For example, on a cruise in December 2005, Carnival recorded 457 separate security incidents on one vessel, during one cruise. In December 2012, across all four Carnival vessels and across all cruises for that month, a total of 67 security incidents were recorded. Carnival has also observed a general decrease in the number of customer service complaints from passengers onboard cruises during Schoolies Periods in relation to excessive behaviour engaged in by passengers aged under 19 years.

Carnival believes that the Exemption has served to:

- (a) discourage Schoolies' participants from making bookings for the purpose of engaging in improper behaviour and under-age drinking; and
- (b) reduced the likelihood of unmanageable large-scale Schoolies events organised through, for example, social networking; and
- (c) promoted an understanding that Carnival cruises will not tolerate improper behaviour and under-age drinking on its cruise-ships as part of Schoolies celebrations;

Carnival also believes that the presence of a responsible adult acting as an authority figure for persons under the age of 19 during the Schoolies Period has served as an effective control mechanism to minimise incidents of underage drinking and other inappropriate behaviour.

Carnival wishes to continue to prioritise the health, safety and security of its passengers generally, and in particular during the Schoolies Period.

As Schoolies celebrations occur every year during the Schoolies Period, Carnival now seeks a Further Exemption in order to continue to lawfully restrict the ability of persons aged under 19 years of age to take part in cruises without a parent or guardian during the Schoolies Period.

In seeking the Further Exemption, Carnival again wishes to emphasise the primacy of the health and safety of its crew and passengers. These health and safety risks are compounded by the following factors:

- (a) the onboard environment contains inherent and risks including, risks associated with confined spaces and falling from heights or into the ocean;
- (b) whilst at sea, Carnival ships are isolated from emergency medical services and there are limited onboard medical facilities;
- (c) whilst at sea, Carnival cannot call upon an immediately available police presence;
- (d) there are practical limitations to security personnel numbers which Carnival can accommodate on its cruises;
- (e) on-board security personnel have limited rights to detain, search and control in terms of managing violent and improper behaviour, and there are limited

facilities in terms of detaining passengers who are a threat to themselves and others;

- (f) from past experience, Schoolies participants have shown a remarkable ingenuity to circumvent procedures implemented by Carnival to restrict access to and the consumption of alcohol;
- (g) from past experience, Schoolies' celebrations have involved large groups organised through school or social networking, who then seek to run events/gatherings on board that are difficult to manage.

Carnival notes that the Commission, in publishing its Notice to Grant a Temporary Exemption to Carnival on 12 January 2011 (which we **enclose** for your convenience) (**Notice**), has also provided reasons as to why it was appropriate to grant Carnival an Exemption. Carnival seeks to rely on these reasons in this application for a Further Exemption. The foundations for the Exemption have not changed.

Key Criteria for Assessment of Application

Guidelines

We refer to the Guidelines for applications for exemptions under section 44 of the Act which are published by the Commission. We note that these Guidelines stipulate a number of criteria to be addressed in applications for exemptions under section 44 of the Act.

Carnival has previously addressed a number of these criteria in its previous application for an exemption dated 7 April 2009 (**Previous Application**). Carnival relies on the submissions and evidence which it made in relation to the Previous Application. A copy of the Previous Application is **enclosed** for your convenience.

1. What circumstances or activities are to be covered by the exemption?

In effect, Carnival seeks an extension of the Exemption, on the same terms. We repeat that these terms represented a significant compromise for Carnival, and Carnival believes that the Exemption strikes an appropriate and reasonable balance between genuine health and safety concerns, and the rights of persons aged under 19 years of age.

Carnival seeks to restrict the ability of persons aged under 19 years of age to take part in Carnival cruises in the absence of a responsible adult during a limited period generally associated with Schoolies' celebrations. For part of this period, Carnival will permit a quota of 60 passengers per cruise under the age of 19 and not accompanied by a responsible adult.

Such a restriction will enable Carnival to control the size of events which are commonly associated with school leavers during the Schoolies Period, and increase its ability to manage these events (including alcohol consumption at these events) without a risk to health and safety.

Carnival wishes to have the following matters covered in the exemption

1. Carnival will implement a policy which seeks to prevent events which may be large in scale and are associated with excessive and / or anti-social behaviour, including the abuse of alcohol (**Unauthorised Events**). Schoolies celebrations are an example of such events.
2. Carnival wishes to impose the following restrictions based on age on its cruises commencing in Australia:
 - (a) For Carnival cruise ships departing an Australian port between 1 November and 7 January annually, passengers under the age of 19 must be accompanied by a responsible adult (**Responsible Adult Requirement**); and
 - (b) For Carnival cruise ships departing an Australian port between 8 January and 31 January annually, Carnival will permit a quota of 60 passengers per cruise who are aged under 19 years to take part in the cruise without being accompanied by a responsible adult. This quota will not include infants and may not, where Carnival believes there is no risk of participation in an Unauthorised Event, include passengers under the age of 17. Beyond the 60 passenger quota, Carnival will require persons under the age of 19 years to be accompanied by a responsible adult.

This particular restriction may be waived by Carnival in its absolute discretion and where Carnival is satisfied that there is no risk that a particular passenger aged under 19 years will take part in an event which threatens the security, health and safety of other passengers and the cruise generally.
3. Where Carnival forms the view, based on reasonable grounds, that a passenger is planning to participate in an Unauthorised Event, Carnival may refuse boarding to that passenger or otherwise impose other conditions aimed at eliminating or reducing any risk to the health, safety and security of passengers and crew on board a particular Carnival cruise. This particular activity applies regardless of age to Carnival cruises which depart at any time during the year.

2. Who will be affected by the application?

Generally, this Further Exemption will affect persons aged between 17 and 19 years who may wish to take part in Carnival cruises during the Schoolies Period in connection with celebrations as a result of their completion of school. However, this impact will only be for a limited period of time, and these persons will not necessarily be prevented from enjoying a cruise during this period. For the first period of approximately two months, this age group can still travel with Carnival provided that they are accompanied by an adult. In the second period of approximately one month, an adult may not be required where Carnival has not filled its quota of 60 persons.

Persons of any age may also be affected by the restriction where Carnival forms the view that they plan to participate in an Unauthorised Event.

3. Is an exemption necessary?

As set out above, Carnival does not, in making this Application, admit that the Act applies to its activities in relation to leisure cruises upon vessels that are not "flagged" in the Australian jurisdiction. However, to the extent that the Commission is of the opinion that the Act does apply, it is possible that by continuing to observe a condition or requirement directly related to chronological age, may amount to unlawful discrimination under section 14 and/or 15 and 28(b) of the Act.

The exemptions in section 33-38, 40-41, 41A and 42-43 of the Act do not appear to apply to the conditions that Carnival continues to impose on persons during the Schoolies Period.

The exemption contained in section 39 of the Act extends to acts done in compliance with certain applicable Commonwealth, State and Territory acts and regulations.

As stated earlier in this Application, the principal reason why Carnival is seeking an extension of the Exemption is an ongoing concern for the health, safety and well-being of all passengers and staff on its vessels.

Carnival is of the view that a Further Exemption is necessary to enable Carnival to ensure, so far as is reasonably practicable, the health, safety and security of its passengers during Schoolies Periods. As indicated earlier in this Application, Carnival has previously attempted to reduce the risks associated with Unauthorised Events by significantly enhancing security and alcohol control measures. However, these have not been successful for the reasons previously outlined in this Application.

4. Why should an exemption be granted?

We have addressed these reasons earlier in this Application.

We repeat that Carnival's application for a Further Exemption is motivated principally by concerns for the health, safety and security of its passengers and crew. In its past experience, Schoolies events have involved anti-social behaviour, abusive behaviour (including sexual and racial abuse), sexual harassment, dangerous skylarking, property damage, violence, fighting, drinking to excess, and substance abuse. This behaviour was often directed at other passengers and crew who were not participating in Schoolies events.

Carnival notes that it has observed a general decrease in the number of Unauthorised Events and reported incidents involving anti-social behaviour during Schoolies Periods since the Commission granted an Exemption to Carnival in 2010.

As such, in seeking a Further Exemption, Carnival is not relying on negative stereotypes of school leavers and persons aged under 19 years. Rather, Carnival is relying on its own direct experiences of incidents during the Schoolies Period, and the comparison of the number of incidents after the Commission granted an Exemption in 2010. Carnival believes that, in order to continue to observe a general decrease in Unauthorised Events and reported incidents during Schoolies Periods, a Further Exemption is necessary.

Carnival notes that, in seeking a Further Exemption and in continuing to lawfully undertake the activities described in section 1 above, such actions are not inconsistent with the objectives of the Act. Carnival is not seeking to remove the ability of persons aged under 19 years to enjoy cruises during Schoolies Periods. Rather, Carnival wishes to ensure that such persons are appropriately supervised in order to reduce the likelihood of the types of unacceptable behaviour associated with Schoolies vacations.

Carnival also respectfully submits that a Further Exemption should be granted as it is appropriate on the grounds of public policy. As set out above, Carnival seeks a Further Exemption for the purpose of continuing to ensure the health, safety and security of its passengers during Schoolies periods, and also because Carnival does not wish to provide a forum for a rite of passage that is endemically associated with alcohol, anti-social behaviour and substance abuse.

Carnival also notes that a number of other hospitality providers in popular Schoolies locations continue to impose conditions on school leavers during Schoolies Periods. Such conditions include increased room and property bonds, and a requirement for a parent or guardian to supervise persons under the age of 21 years. Further, Carnival notes that some properties simply refuse persons under the age of 21 to book hotel rooms during Schoolies periods.

Finally, Carnival refers to the Notice in which the Commission provided its reasons for granting Carnival's initial Exemption. Carnival notes that the Commission has stated the following in the Notice:

- The secondary supply of alcohol, in contravention of Carnival's Responsible Service of Alcohol policies and obligations, raises a significant risk to the health, safety and security of passengers and the Responsible Adult Requirement is an appropriate response to that concern.
- Although the Commission was of the view that Carnival's policy to be encompassed by the Exemption allowed conduct which was allegedly inconsistent with the objects of the Act, this was not of itself a reason for the Commission to deny the application for an Exemption. Accordingly, the Commission considered the reasonableness of Carnival's policy, weighing up the nature and extent of the discriminatory effect against the reasons advanced in favour of the Exemption.
- In taking into account a number of factors, including Carnival's legitimate concerns about controlling the consumption of alcohol on board its cruises, Carnival's policy encompassed by the Exemption was a reasonable measure which should be permitted.
- Carnival sought to minimise as far as possible the discriminatory effect of its policy encompassed by the Exemption by reducing both the age range and the time period of the Responsible Adult Requirement and by making it subject to exceptions in appropriate cases.

The above reasons put forward by the Commission in the Notice are relevant to the present application for a Further Exemption. That is, the circumstances surrounding Carnival's Further Exemption are the same as those relating to the initial Exemption application, which was granted by the Commission. As such, Carnival submits that such reasons should be considered by the Commission now in determining whether to grant Carnival a Further Exemption.

5. Are there factors that may affect the processing of the application?

In previous correspondence from the Commission dated 21 December 2010, we note that the Commission foreshadowed that Carnival should provide certain additional information in an application for a Further Exemption.

In particular, the Commission sought the information in response to a number of questions. These questions, together with Carnival's responses are as follows:

- (c) ***How many Carnival Australia cruise ships departed from an Australian port, and what was the date of their departure and the identifying ship number for each vessel?***

Please refer to the table at **Schedule A**.

- (d) ***How many young people (aged 16-18 years old, inclusive) were on board each cruise ship? Please provide a breakdown of these passenger numbers on the basis of the age of the passenger.***

Please refer to the table at **Schedule A**.

- (e) ***How many young people were accompanied by an adult, and how many were unaccompanied?***

Please refer to the table at **Schedule B**.

- (f) ***In respect of each cruise, were there any recorded incidents of inappropriate or anti-social behaviour? Please provide details of the nature and seriousness of the incident and the age of the passengers involved in the incident.***

Carnival keeps comprehensive and detailed records of every security incident which occurs on its vessels. Those records contain personal and potentially sensitive information which is highly confidential and occasionally the subject of police investigation.

Without disclosing potentially sensitive details in relation to individual incidents, Carnival notes that it has observed a decrease in the nature and seriousness of security incidents within the relevant period since the exemption has been granted.

By way of example, on a dedicated Schoolies cruise in December 2005, Carnival recorded 457 separate security incidents during one cruise alone. In December 2012, across all four Carnival vessels and

all cruises for that month, a total of 67 security incidents were recorded in relation to passengers of all ages.

- (g) ***How frequently (if at all) did Carnival Australia waive the requirement that any passenger under the age of 19 years of age must be accompanied by a responsible adult? In each case, please advise the age of the passenger in respect of whom the policy was waived. Please also advise which cruise ship each passenger was on.***

Having made enquiries, Carnival is aware of one instance in which it waived the responsible adult requirement in relation to a married couple under the age of 19 who indicated they did not intend to participate in Schoolies celebrations or any other unauthorised events.

- (h) ***How frequently (if at all) did Carnival Australia increase the quota in clause 2(b) of the Unauthorised Events Policy?***

Carnival increased its quota in clause 2(d) of the Unauthorised Events Policy on one occasion in January 2012. At this time, the quota was increased to accommodate 68 passengers under the age of 19 who were not accompanied by a responsible adult. To the best of Carnival's knowledge, it has not been necessary to consider increasing the quota in clause 2(d) on other occasions as Carnival has not had more than 60 unaccompanied passengers aged under 19 years make bookings during the relevant period.

- (i) ***Has there been a decrease in the number or the seriousness of recorded incidents of inappropriate or anti-social behaviour during the period of the exemption, in comparison to reported incidents on Carnival cruise ships since 2007? Please provide a copy of Carnival's guidelines for the recording of inappropriate or anti-social behaviour. Please advise if there have been any changes to these guidelines over the last 12 months.***

Carnival has observed a general decrease in the number of incidents reported during Schoolies Periods since 2007.

With respect to Carnival's guidelines for recording of inappropriate or anti-social behaviour, this is addressed in Carnival's Fleet Regulations in relation to excessive behaviour. Carnival notes that these Fleet Regulations are a highly confidential security document and public disclosure of this document may compromise Carnival's security processes and procedure. Should the Commission consider the contents of this document relevant to this application for a Further Exemption, we ask that the Commission contact us so that we may provide a general description of the document which is appropriate for public dissemination.

To the best of Carnival's knowledge, the Fleet Regulations have not been changed over the last 12 months.

* * * * *

We thank you for considering Carnival's application for a Further Exemption. Carnival would be happy to provide any further information, which may assist the Commission in considering this application.

Yours faithfully,



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Encl

Schedule A

The following pages contain three tables providing statistical information referable to the Schoolies Period in relation to how many:

- Carnival cruise ships departed from an Australian port, their date of departure and identifying vessel number; and
- passengers aged 16-18 years were on board each Carnival cruise ship.

Please note this information excludes information relating to overseas passengers and only counts passengers sailing from a home port.

2010/2011 Cruises during Schoolies Period

Cruise Information			Age of Passengers			
Year	Cruise	Departure Date	16	17	18	Grand Total
2010	J035	13/11/2010	10	13	17	40
	W040	6/11/2010	7	9	5	21
	W041	13/11/2010	13	7	26	46
	W042	20/11/2010	23	60	36	119
2011	J036	27/11/2010	11	15	14	40
	J037	10/12/2010	16	17	10	43
	J038	18/12/2010	26	26	37	89
	J101	28/12/2010	24	24	25	73
	J102	9/01/2011	24	24	52	100
	J103	19/01/2011	40	31	48	119
	J104	29/01/2011	7	7	21	35
	P007N	22/12/2010	28	24	21	73
	P101N	30/12/2010	25	13	17	55
	P102N	9/01/2011	36	28	28	92
	P103N	19/01/2011	28	25	22	75
	P104	27/01/2011	13	7	15	35
	P105	30/01/2011	13	13	21	47
	W043N	27/11/2010	28	18	9	55
	W043P	11/12/2010	46	25	30	101
	W044	18/12/2010	22	26	16	64
	W101	27/12/2010	38	30	26	94
	W102	8/01/2011	37	35	68	140
	W103	15/01/2011	38	29	45	112
	W104	22/01/2011	26	35	55	116
W105	29/01/2011	3	14	29	46	
Grand Total			582	555	693	1830

2011/2012 Cruises during Schoolies Period

Cruise Information			Age of Passengers			
CCLYr	Cruise	DepartureDate	16	17	18	Grand Total
2011	J133	4/11/2011	2	5	12	19
	J134	7/11/2011	6	5	16	27
	J135	17/11/2011	12	8	11	31
	P134	4/11/2011	4	9	6	19
	P135	13/11/2011	19	14	16	49
	W140	5/11/2011	9	6	17	32
	W141	12/11/2011	12	7	21	40
	W142	19/11/2011	13	28	8	49
2002	P134	4/11/2011	4	9	6	19
	P135	13/11/2011	19	14	16	49
	P201	29/12/2011	24	20	19	63
	P202	8/01/2012	28	28	34	90
	P203	18/01/2012	42	19	23	84
	P204	26/01/2012	20	19	11	50
Grand Total			214	191	216	621

2012/2013 Cruises during Schoolies Period

Cruise Information			Age of Passengers			
CCLYr	Cruise	DepartureDate	16	17	18	Grand Total
2012	J234	3/11/2012	3	2	7	12
	J235	9/11/2012	7	3	10	20
	J236	12/11/2012	14	12	21	47
	J237	22/11/2012	12	14	24	50
	P237	3/11/2012	3	4	10	17
	P238	9/11/2012	12	12	12	36
	W239	3/11/2012	14	10	28	52
	W240	10/11/2012	18	8	19	45
	W241	17/11/2012	19	106	88	213
2013	J238	25/11/2012	22	35	62	119
	J239	4/12/2012	40	44	65	149
	J240	18/12/2012	29	29	45	103
	J301	28/12/2012	29	32	44	105
	J302	9/01/2013	34	21	73	128
	J303	19/01/2013	34	29	71	134
	J304	29/01/2013	13	32	96	141
	P239	23/11/2012	9	18	17	44
	P240	6/12/2012	34	47	71	152
	P241	14/12/2012	14	28	32	74
	P242	17/12/2012	38	31	23	92
	P301	27/12/2012	26	33	49	108
	P302	8/01/2013	39	34	55	128
	P303	17/01/2013	41	28	50	119
	P304	25/01/2013	18	17	29	64
	P305	28/01/2013	18	16	36	70
	W242	24/11/2012	15	24	18	57
	W243	8/12/2012	31	38	51	120
	W244	15/12/2012	32	30	34	96
	W301	27/12/2012	30	26	52	108
	W302	5/01/2013	28	29	40	97
	W303	12/01/2013	37	29	39	105
	W304	19/01/2013	31	28	62	121
W305	26/01/2013	42	37	102	181	
Grand Total			786	886	1435	3107

Schedule B

The following pages contain three tables providing statistical information referable to the Schoolies Period in relation to how many unaccompanied young passengers aged between 16-18 were present on Carnival cruises during Schoolies Periods.

Please note this information excludes information relating to overseas passengers and only counts passengers sailing from a home port.

2010/2011 Cruises during Schoolies Period

Cruise Code	Unaccompanied Young Passengers
J035	4
J036	3
J037	4
J038	7
J101	18
J102	43
J103	43
J104	10
P007N	2
P101N	6
P102N	23
P103N	21
P104	2
P105	3
W040	3
W041	4
W042	2
W043N	5
W043P	0
W044	0
W101	3
W102	45
W103	31
W104	25
W105	2
Grand Total	309

2011/2012 Cruises during Schoolies Period

Cruise Code	Unaccompanied Young Passengers
J133	0
J134	3
J135	2
J136	8
J137	16
J138	13
J201	6
J202	49
J203	50
J204	4
P134	3
P135	2
P136	7
P137	10
P138	0
P139	2
P201	0
P202	23
P203	19
P204	6
P205N	4
W140	0
W141	0
W142	0
W143	2
W144	5
W145	7
W201	10
W202	34
W203	46
W204	11
Grand Total	342

2012/2013 Cruises during Schoolies Period

Cruise Code	Unaccompanied Young Passengers
J234	0
J235	2
J236	7
J237	4
J238	11
J239	16
J240	15
J301	12
J302	47
J303	51
J304	68
P237	0
P238	0
P239	4
P240	13
P241	10
P242	0
P301	9
P302	34
P303	25
P304	7
P305	8
W239	2
W240	6
W241	17
W242	2
W243	8
W244	14
W301	13
W302	14
W303	31
W304	31
W305	45
Grand Total	526