

Schedule A

Terms of the Last Exemption (as set out at 7.1(a) of the Notice to Grant a Temporary Exemption to Carnival dated 17 October 2019)

Terms of the Exemption

Carnival may impose the following restrictions, based on age, in relation to its cruises commencing in Australia:

1. For Carnival cruise-ships departing an Australian port between 1 November and 7 January, Carnival will permit a quota of 20 passengers per cruise who are under the age of 19 and not accompanied by a responsible adult. Once this quota is filled, Carnival will require passengers who are under the age of 19 to be accompanied by a responsible adult (Responsible Adult Requirement).
2. For Carnival cruise-ships departing an Australian port between 8 January and 31 January, Carnival will permit a quota of 60 passengers per cruise who are under the age of 19 and not accompanied by a responsible adult. Once this quota is filled, Carnival will apply its Responsible Adult Requirement.
3. The quotas, in 1 and 2 above, will not include infants and will also not include passengers under the age of 17 where Carnival considers that the minor does not present a risk of participating in an Unauthorised Event. Carnival will otherwise determine how the quota in each period is filled.

Carnival may, in its sole and absolute discretion, increase the quota in either or both periods, where it decides that the increase will not result in a risk to health, safety and security of the passengers and crew, having regard to the purpose of its policy.

Carnival may, at its sole and absolute discretion, waive the Responsible Adult Requirement where it is satisfied that a specific passenger under the age of 19 does not present a risk of participating in an Unauthorised Event. Carnival may require any such passenger to sign a code of conduct or provide other commitments as a condition of boarding.

Where the Responsible Adult Requirement is mentioned in Carnival's advertising or online booking system, Carnival will clearly state that it can decide to waive the Responsible Adult Requirement. Carnival will state that prospective passengers can apply to Carnival for a waiver of the Responsible Adult Requirement and will provide information about how an application for a waiver can be lodged. Carnival will provide clear publicly available information regarding the factors it considers when making decisions about waiver applications. This information will be provided at the time of booking. Carnival will also state that requests for review in relation to a waiver application decision can be made through its complaint handling process and will publish information about this process.

Carnival will assess each application for waiver of the Responsible Adult Requirement that it receives (when the relevant quota is filled, and it becomes applicable).

Carnival will continue operating its complaint handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.

" 2010 Notice "

AUSTRALIAN HUMAN RIGHTS COMMISSION AGE DISCRIMINATION ACT 2004 (CTH), section 44(1) NOTICE TO GRANT A TEMPORARY EXEMPTION

By this instrument, the Australian Human Rights Commission ('Commission') grants the application of Carnival plc (trading as Carnival Australia) for a temporary exemption pursuant to s 44(1) of the *Age Discrimination Act 2004* (Cth) ('ADA').

BACKGROUND

Carnival plc (trading as Carnival Australia) (the 'Applicant') is a cruise company and operator of 12 cruise brands, including P&O Cruises Australia and Princess Cruises Australia.

Nature of application

(a) Description of the Applicant's proposed policy

The Applicant has applied for a temporary exemption under the ADA in respect of a policy to prevent Unauthorised Events occurring on its cruise ships which are likely to compromise the health, safety and security of passengers and crew.

The Applicant's policy defines an Unauthorised Event as any event which may be large in scale, and which is associated with excessive or anti-social behaviour, including the abuse of alcohol. The Applicant's policy specifically identifies a 'Schoolies' event as an example of an Unauthorised Event. The Commission notes that term 'Schoolies' events generally refers to celebrations by young people who have either just finished their last year of high school, or who are celebrating with other young people who have just finished their last year of high school.

(b) Restrictions based on age in the Applicant's policy

The Applicant wishes to impose the following restrictions based on age on Applicant cruises commencing from Australia:

- for Applicant cruise ships departing an Australian port between 1 November and 7 January annually, passengers who are under the age of 19 must be accompanied by a responsible adult (the 'Responsible Adult Requirement'); and
- for Applicant cruise ships departing an Australian port between 8 January and 31 January annually, the Applicant will permit a quota of 60 passengers per cruise who are under 19 years of age and not accompanied by a responsible adult. After this quota is filled, the Applicant will apply its requirement that passengers under 19 years of age must be accompanied by a responsible adult.

In respect of the first restriction, the Applicant may, at its own initiative, waive the Responsible Adult Requirement where it is satisfied (in its sole and absolute discretion) that there is no risk that a specific passenger under the age of 19 will participate in an Unauthorised Event. The Applicant may require any such passenger to sign a code of conduct or provide other commitments as a condition of boarding. This discretion may be exercised by the Applicant on a case by case basis. The

Applicant will not (and is not required to) make an assessment of each and every case.

In respect of the latter restriction, the Applicant notes that the quota will not include infants, and will also not include passengers under the age of 17 where the Applicant believes there is no risk that the minor will participate in an Unauthorised Event. The Applicant will otherwise determine how the quota is filled.

The Applicant may, in its sole and absolute discretion, increase this quota where it decides that this increase will not result in a risk to health, safety and security of passengers and crew, having regard to the purpose of the Applicant's policy.

(c) *The Applicant's proposed general right of refusal in relation to all of its cruises*

Where the Applicant forms the view, on reasonable grounds, that a passenger (of any age) is planning to participate in an Unauthorised Event, the Applicant may refuse boarding to that passenger or impose other conditions aimed at reducing or eliminating any risk to the health, safety and security of passengers and crew. Those conditions include requiring the passenger to sign a code of conduct or provide other commitments as a condition of boarding.

This restriction applies in respect of any Applicant cruise ship departing from an Australia port at any time of the year. The restrictions based on age, outlined in paragraph (b) above, are not intended to limit the operation of this general right of refusal.

Applicant's reasons for requesting an exemption

The Applicant is seeking to prevent events occurring on board its cruise ships which compromise the Applicant's ability to ensure the health, safety and security of passengers and crew. The Applicant is particularly concerned about 'Schoolies' celebrations on board its cruise ships and has outlined its ongoing concern about the risk of secondary supply of alcohol on board its cruise ships to passengers under the age of 18.

Until 2007, the Applicant operated 'Schoolies' cruises which catered exclusively for passengers aged 16 to 19 years of age celebrating the end of their high school education. The Applicant states that it discontinued these cruises because of an exponential increase in alcohol-related security incidents during the cruises. While the Applicant discontinued its 'Schoolies' cruises and its marketing towards school leavers, the Applicant states that there has continued to be a high level of school-leavers seeking to book cruises during the summer months.

In 2009, the Applicant made an application to the Commission for a temporary exemption under the ADA to permit it to operate an 'under-21s' policy. The Applicant's under-21s policy was to require all persons under the age of 21 to travel with a parent or guardian on Applicant cruise ships between 1 November and 30 January each year. The Applicant sought the under-21s policy to address its concerns about 'Schoolies' celebrations on board its cruise ships, and submitted that it had tried all other reasonable measures open to it, without success.

The Commission declined to grant that temporary exemption application. One of the Commission's reasons was that the scope of the requested exemption was significantly broader than its intended purpose. The objective of the under-21s policy was to discourage school leavers from taking cruises during the traditional 'Schoolies' period. The effect of the under-21s policy was to exclude all persons under the age of 21, regardless of whether they were school leavers, university students or in full-time employment.

The Applicant has submitted a revised temporary exemption application whose restrictions correspond more closely with the type of behaviour it is seeking to address.

REASONS FOR DECISION

The Commission has decided to grant the application. The reasons for the Commission's decision are as follows.

The Applicant's policy pursues a legitimate public policy goal and is appropriately targeted in its approach

The Commission accepts the Applicant's health, safety and security concerns regarding 'Schoolies' celebrations, including the risk of secondary supply of alcohol to passengers under the age of 18, and the difficulty in preventing this as the number of people involved in the celebration increases. Considering that the secondary supply of alcohol contravenes the Applicant's RSA policies and obligations and raises a significant risk to the health, safety and security of passengers, the Responsible Adult Requirement is an appropriate response to that concern.

The Commission considers that limiting the Responsible Adult Requirement to passengers under the age of 19, instead of the Applicant's earlier proposal of applying the Responsible Adult Requirement to all passengers under the age of 21, is an appropriately targeted approach.

The Commission also considers that the Applicant's proposal to introduce an adjustable quota of unaccompanied passengers under the age of 19 on cruises between 8 January and 31 January narrows the application of the Responsible Adult Requirement to a period which more closely resembles the traditional period for 'Schoolies' celebrations.

Finally, the Commission notes that the Applicant's policy provides for a waiver of the Responsible Adult Requirement. This waiver recognises that there will be passengers under the age of 19 who do not present a risk of participating in an Unauthorised Event and thus should not be subject to the limitation.

Having regard to the objects of the ADA, the Applicant's policy is a reasonable measure

In making a determination on a temporary exemption application under the ADA, the Commission has regard to the objects of the Act. The objects of the ADA include seeking to eliminate, as far as possible, discrimination against persons on the ground of age in a range of areas, including provision of goods, services and facilities and accommodation.

The Commission recognises that the Applicant's policy allows conduct which is inconsistent with the objects of the ADA. While this is a factor which suggests against the grant of the exemption sought,¹ it does not mean that the Commission cannot grant the exemption. In line with the Commission's guidelines on the granting of temporary exemption under the ADA, the Commission has considered the reasonableness of the Applicant's policy, weighing up the nature and extent of the discriminatory effect against the reasons advanced in favour of the exemption.²

The Commission has taken into account the Applicant's legitimate concern about controlling the consumption of alcohol on board its cruises and its previous experience of 'Schoolies' celebrations. The Commission has also taken into account the Applicant's substantial narrowing of its earlier proposal. In the Commission's view, the Applicant's policy is a reasonable measure which should be permitted. The Applicant has sought to minimise as far as possible the discriminatory effect of its policy 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.

TERM OF EXEMPTION

The Commission grants the temporary exemption for a term of 2.5 years, commencing on 23 December 2010 and expiring on 22 June 2013.

APPLICATION FOR REVIEW

Subject to the *Administrative Appeals Tribunal Act 1975* (Cth), any person whose interests are affected by this decision may apply to the Administrative Appeals Tribunal for a review of the decision.

Dated this 21st day of December 2010



Signed by the President, Catherine Branson QC, on behalf of the Commission.

¹ Australian Human Rights Commission, *Temporary Exemption under the Age Discrimination Act: Commission Guidelines* (2009), section 3(b). Available at: http://www.humanrights.gov.au/legal/exemptions/ada_exemption/ada_exemp_info_appl.html.

² Australian Human Rights Commission, note 1, section 3(b).



**AUSTRALIAN HUMAN RIGHTS COMMISSION
AGE DISCRIMINATION ACT 2004 (CTH), S 44(2)
NOTICE OF GRANT OF A TEMPORARY EXEMPTION**

By this instrument, under section 44(2) of the *Age Discrimination Act 2004* (Cth)(ADA), the Australian Human Rights Commission grants an exemption to Carnival plc, trading as Carnival Australia (Carnival), from the operation of section 28 of the ADA.

This exemption is granted for a period of two and half years from the date of this instrument and is subject to the conditions outlined below.

SUMMARY

Carnival is a cruise company which operates cruises to the Pacific Islands from Australia and New Zealand.

On 7 April 2009, Carnival applied for an exemption under the ADA to implement a strategy for managing security issues which were arising on its cruises at the time of the 'Schoolies Period'. The core aspects of this strategy, for which the exemption was sought, were, inter alia:

- a) requiring that any passengers under the age of 19 years, travelling in the period 1 November to 7 January, be accompanied by a responsible adult (subject to waiver by Carnival); and
- b) restricting to 60 (subject to any increase at Carnival's discretion) the number of unsupervised passengers under the age of 19 years on-board any cruise in the period 8 January to 31 January.

On 23 December 2010, the Commission granted to Carnival an exemption for two and a half years (Initial Exemption).

On 21 June 2013, Carnival applied to the Commission for an extension of the Initial Exemption, on the same terms, for a further period of two and a half years (Application). The exemption is granted subject to further conditions. The terms of the exemption are set out below.

BACKGROUND

Carnival relies on the same reasons for seeking the further exemption as it relied on in its Initial Exemption application in April 2009.

In support of the further Application, Carnival has also included data relevant to its implementation of the Initial Exemption.

Reasons for initial application

Carnival states that prior to lodging the Initial Exemption application it experienced a high level of alcohol-fuelled and other security incidents on-board its cruises in the traditional 'Schoolies Period', which it defines as 1 November to 31 January (Schoolies Period).

Up until 2006, Carnival operated 'Schoolies' cruises, which were marketed exclusively to passengers aged 16 to 19 years celebrating the end of their high school education. However, these 'Schoolies' cruises became problematic due to the large number of alcohol-related and other security incidents involving a large number of school-leavers (Schoolies). These incidents included serious risks to the health and safety of passengers, crew and the Schoolies participants themselves.

Carnival attempted to reduce the number and severity of these incidents by obtaining the advice of security experts and implementing a range of security measures, such as restricting access to alcohol, increasing security presence on-board its cruises and increasing pre-boarding / on-boarding searches for contraband alcohol. Despite these various measures, Carnival advised that it continued to experience a large number of alcohol-fuelled incidents involving Schoolies.

Sometime in 2006, Carnival made a decision to discontinue promoting its cruises to school leavers. However, Carnival advised that even after this step was taken, there continued to be large numbers of school-leavers booking cruises and it continued to experience alcohol-fuelled and other 'Schoolies' incidents.

Reasons for further Application

Carnival advises that since the Commission granted the Initial Exemption, it has observed a significant decrease in the number of alcohol-related security incidents during the Schoolies Period. Carnival considers that this decrease is attributable to the Initial Exemption granted by the Commission in December 2010.

By way of example, Carnival states that:

- in December 2005, it recorded 457 separate security incidents on one cruise-ship, during one cruise;
- in December 2012, it recorded a total of 67 security incidents, across its four cruise-ships in all cruises for that month.

Carnival also states that the Initial Exemption has served to:

- discourage Schoolies from making bookings for the purpose of engaging in improper behaviour and under-age drinking;
- reduce the likelihood of unmanageable large-scale 'Schoolies' events organised through means such as social networking;

- promote an understanding that Carnival cruises will not tolerate improper behaviour and under-age drinking on its cruise-ships as part of the Schoolies Period celebrations.

In seeking the further exemption, Carnival emphasises the primacy of health, safety and security of its crew and passengers. It states that health and safety risks on its cruise-ships are compounded by the following factors:

- the on-board environment contains inherent risks, including risks associated with confined spaces and falling from heights or into the ocean;
- while at sea, its cruise-ships are isolated from emergency medical services and there are limited on-board medical facilities;
- while at sea, it cannot call upon an immediately available police presence;
- there are practical limitations to security personnel numbers which it can accommodate on its cruises;
- on-board security personnel are limited in terms of:
 - their rights to detain, search and control passengers; and
 - the facilities available for detaining passengers who are a threat to themselves and/or others;
- past experience shows that Schoolies participants have a remarkable ingenuity for circumventing its procedures in relation to restricting access to and the consumption of alcohol;
- past experience shows that Schoolies' celebrations involve large groups organised through school and social networking, and these groups seek to run events/gatherings on-board which are difficult to manage.

Data from the Initial Exemption period

In support of its reasons as to why the further exemption should be granted, Carnival has included relevant data and feedback for the period 2010 – 2013, in relation to the following matters:

- how many Carnival cruises departed from Australian ports in the Schoolies Period;
- how many young people (aged 16-18 years inclusive) were on-board each of the cruise-ships which departed in the Schoolies Period;
- how many young people, on the cruise-ships which departed in the Schoolies Period, were accompanied by an adult and how many were unaccompanied;
- incidents of anti-social behaviour on its cruise-ships during the Schoolies Period;

- how frequently Carnival waived the responsible adult requirement, applicable in the period 1 November to 7 January; and
- how frequently Carnival increased the 60 passenger quota, applicable in the period 8 January to 31 January.

Submissions received by the Commission

Carnival's request for a further temporary exemption was posted on the Commission's website and interested parties were invited to comment on the Application.¹ The Commission also circulated the Application to:

- a) all State and Territory anti-discrimination bodies;
- b) the New South Wales Police Marine Area Command; and
- c) the Alcohol and Other Drugs Council of Australia.

The Commission received four submissions in response to the Application. Each of these has been posted on the Commission's website.²

The Equal Opportunity Commission of Western Australia did not express a view on whether the Commission should grant the exemption, but noted that:

- it would still be statutorily bound to investigate any complaint alleging a breach of the age discrimination provisions of the *Equal Opportunity Act 1984* (WA) (EO Act); and
- if the exception under section 66ZM of the EO Act did not apply to Carnival's circumstances, Carnival should consider making an exemption application under the EO Act through the State Administrative Tribunal of Western Australia.

The Anti-Discrimination Commission of Queensland (ADCQ) advised that it had no objection to the Commission granting the further exemption. ADCQ stated that the material set out in the Application supported Carnival's policy and indicated that it was a reasonable measure for a legitimate public interest.

The Alcohol and Other Drugs Council of Australia (ADCA) made a submission in support of the exemption. The ADCA stated that its support is based on strong evidence which shows that people in the 16-18 age group should not be drinking at levels which are often reached when drinking in groups. It also noted that the general risks associated with young people drinking are compounded by the dangers alcohol may pose in the potentially high-risk marine environment.

The Anti-Discrimination-Board of New South Wales (ADBNSW) made a submission which did not support the grant of the exemption. The ADBNSW stated that the age restriction was discriminatory towards people of a particular age group, whether they are accompanied by a responsible adult or not. Its main concern was that the exemption

¹ <http://www.humanrights.gov.au/notice-application-exemption-carnival-australia>

² Ibid.

appeared to be inconsistent with the purposes of the ADA; in its view, the age restriction does not provide a bona fide benefit to persons of a particular age, does not intend to meet a need that arises out of the age of a person and nor is it intended to reduce the disadvantage experienced by people of a particular age. The ADBNSW also noted that the restrictions in Carnival's Initial Exemption, and the application of the restrictions at the sole discretion of Carnival, leaves open the potential of discrimination under other grounds, and this observation is based on the substance and number of complaints which the ADBNSW receives from young people.

RELEVANT LAW

The Commission may grant an exemption from the operation of a provision of Division 2 or 3 of Part 4 of the ADA.³ An exemption may be granted subject to terms and conditions specified in the instrument and may be expressed to apply only in circumstances, or in relation to particular activities, as specified in the instrument.⁴ Exemptions are to be granted for a specified period not exceeding five years.⁵ It is not unlawful for a person to act in accordance with an exemption.⁶

Pursuant to section 28 of the ADA, it is unlawful to discriminate on the ground of age in the provision of goods, services or facilities. This provision is located in Division 3 of Part 4 of the ADA. Therefore, the Commission may grant Carnival an exemption from the operation of section 28 of the ADA.

DECISION AND REASONS

The Commission has decided to grant an exemption to Carnival from section 28 of the ADA on the terms set out below, in order to allow Carnival to implement its age restriction policy which has the aim of preventing 'Unauthorised Events' occurring on its cruise-ships.

Carnival's policy defines an 'Unauthorised Event' as any event which may be large in scale and which is associated with excessive or anti-social behaviour, including the abuse of alcohol (Unauthorised Event). Carnival's policy identifies a 'Schoolies Event' as an example of an Unauthorised Event. The Commission notes that the term 'Schoolies Event' generally refers to celebrations by young people who have just finished their last year of high school, or who are celebrating with other young people who have just finished their last year of high school.

Terms of the Exemption

Carnival may impose the following restrictions, based on age, in relation to its cruises commencing in Australia:

³ Section 44(1) and (2) of the ADA.

⁴ Section 44(3)(a) and (b) of the ADA.

⁵ Section 44(3)(c).

⁶ Section 47 of the ADA.

1. For Carnival cruise-ships departing an Australian port between 1 November and 7 January annually, passengers who are under the age of 19 must be accompanied by a responsible adult (Responsible Adult Requirement).

Carnival may, at its sole discretion, waive the Responsible Adult Requirement where it is satisfied (in its sole and absolute discretion) that there is no risk that a specific passenger under the age of 19 will participate in an Unauthorised Event. Carnival may require any such passenger to sign a code of conduct or provide other commitments as a condition of boarding.

Where the Responsible Adult Requirement is mentioned in Carnival's advertising or online booking system, Carnival will also state that it has retained a discretion to waive the Responsible Adult Requirement.

This discretion may be exercised by Carnival on a case by case basis and Carnival is not required to make an assessment of each and every case, nor is Carnival required to engage in a review process of any decision in relation to its exercise of the discretion.

2. 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 under the age of 19 and not accompanied by a responsible adult. Once this quota is filled, Carnival will apply its Responsible Adult Requirement.

The quota will not include infants and will also not include passengers under the age of 17, where Carnival believes there is no risk that the minor will participate in an Unauthorised Event. Carnival will otherwise determine how the quota is filled.

Carnival may, in its sole and absolute discretion, increase this quota where it decides that the increase will not result in a risk to health, safety and security of the passengers and crew, having regard to the purpose of its policy.

Carnival will retain an absolute discretion to accept or reject any application/request for waiver of the Responsible Adult Requirement (where the quota is filled and it becomes applicable). It will not be required to engage in a review process of any decision in relation to its exercise of the discretion.

Conditions

This exemption is subject to the following conditions:

- a) Carnival will report to the Commission at the end of this exemption period, how many applications/requests for waiver of the Responsible Adult Requirement it receives for the 1 November – 7 January period and how many of these applications/requests it approves.
- b) Carnival will report to the Commission at the end of this exemption period
 - i. how many applications/requests it receives for waiver of the Responsible Adult Requirement during the 8 January – 31 January period, once the quota is filled; and
 - ii. on how many occasions and to what number it increases the quota.

Period of Exemption

The exemption is granted for a period of two and half years from the date of this instrument.

Reasons for Decision

The reasons for the Commission's decision to grant the exemption are as follows.

Carnival's policy pursues a legitimate public policy goal and is appropriately targeted in its approach

The Commission accepts Carnival's health, safety and security concerns regarding Schoolies celebrations on its cruises, including:

- the risk of secondary supply of alcohol to passengers under the age of 18 and the difficulty of preventing this. Considering that the secondary supply of alcohol contravenes Carnival's RSA policies and obligations, and raises a significant risk to the health, safety and security of passengers, the Responsible Adult Requirement is an appropriate response to that concern;
- the ability of Schoolies to organise unmanageable large-scale events through means such as social networking;
- the limited capacity of on-board medical facilities in the event of accidents and the risks of accidents occurring (such as falling from heights on a cruise-ship or into the ocean). The Commission also notes the submission of ADCA that general risks associated with young people drinking are compounded by the dangers alcohol may pose in the potentially high-risk marine environment;
- the inability to call upon a police presence in the management of issues which may arise as a result of Unauthorised Events; and
- the limitations facing on-board security personnel in the management of issues which may arise as a result of Unauthorised Events.

The Commission considers that the parameters Carnival has set in relation to the Responsible Adult Requirement make it an appropriately targeted approach. Specifically, the Commission has had regard to the Responsible Adult Requirement being:

a) Appropriately targeted in terms of age.

The Responsible Adult Requirement is limited to passengers under the age of 19 years and, in respect of the restrictions in the period 8 January – 31 January, it does not include passengers under the age of 17 where Carnival believes there is no risk that the minor will participate in an Unauthorised Event.

b) Appropriately targeted in terms of its periods of application.

The Responsible Adult Requirement is applied more strictly in the period 1 November – 7 January, where passengers under the age of 19 are not able to

travel unless accompanied by a responsible adult. This period closely resembles the traditional period for 'Schoolies' celebrations.

The Responsible Adult Requirement is applied less strictly in the period 8 January – 31 January, during which time Carnival applies the adjustable quota restriction. The Commission notes that during the Initial Exemption period, Carnival has on one occasion increased the quota of 60 to 68 and that it has not been necessary to consider increasing the quota on other occasions as Carnival has not had more than 60 passengers under the age of 19 seek to make bookings during the relevant period.

- c) Appropriately targeted in terms of its flexibility in application.

Carnival's policy provides for a waiver (at its discretion) of the Responsible Adult Requirement. Carnival will state in its advertising and online booking system that it has retained this waiver discretion.

The ability to waive the Responsible Adult Requirement recognises that there will be passengers under the age of 19 who do not present a risk of participating in an Unauthorised Event and thus should not be subject to the limitation.

Carnival's policy is a reasonable measure having regard to the objects of the ADA

In making a determination on a temporary exemption application under the ADA, the Commission has regard to the objects of the ADA. The objects of the ADA include seeking to eliminate, as far as possible, discrimination against persons on the ground of age in a range of areas, including provision of goods, services or facilities.

The Commission recognises that Carnival's policy allows conduct which is inconsistent with the objects of the ADA. While this is a factor weighing against the grant of the exemption sought,⁷ it does not mean that the Commission cannot grant the exemption. In line with the Commission's Guidelines on the granting of a temporary exemption under the ADA, the Commission has assessed:

- 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; and
- whether the exemption could be granted subject to terms and conditions which further the objects of the ADA.

In undertaking this assessment, the Commission has considered the following:

- a) Carnival's legitimate concerns about controlling the consumption of alcohol on-board its cruises and its previous difficulties in managing the health, safety and security issues associated with 'Schoolies' celebrations;
- b) Carnival's submissions regarding the effectiveness of the Initial Exemption in reducing security incidents on-board its cruises;

⁷ Australian Human Rights Commission, *Temporary Exemptions Under the Age Discrimination Act: Commission Guidelines* (2010), section 3(b).

- c) Carnival has minimised the discriminatory impact of its policy by making it appropriately targeted in its application (noting the parameters of the Responsible Adult Requirement, discussed above) and has thereby limited its discriminatory effect;
- d) Carnival's application of the Responsible Adult Requirement during the Initial Exemption period shows that Carnival has:
 - i. in relation to the 1 November – 7 January period, at least in one case exercised its discretion to waive the Responsible Adult Requirement for people under the age of 19; and
 - ii. in relation to the 8 January – 31 January period, increased the quota in one case.

This indicates that Carnival has at least in some cases accommodated the individual circumstances of particular young people and this contributes to the reasonableness of the policy;

- e) The additional terms of this further exemption, that Carnival will state in its advertising and online booking system the existence of its discretion to waive the Responsible Adult Requirement, will further reduce the discriminatory impact of the exemption as young people will be aware of the flexible operation of Carnival's age restriction policy.

The Commission concludes that Carnival's policy is a reasonable measure which should be permitted, having weighed up the nature and extent of the discriminatory effect against the reasons in favour of the exemption.

APPLICATION FOR REVIEW

Subject to the *Administrative Appeals Tribunal Act 1975* (Cth), any person whose interests are affected by this decision may apply to the Administrative Appeals Tribunal for a review of the decision.

Dated this 15th day of November 2013.

Signed by the President, Professor Gillian Triggs, on behalf of the Commission.



**AUSTRALIAN HUMAN RIGHTS COMMISSION
AGE DISCRIMINATION ACT 2004 (CTH), S 44(2)
NOTICE OF GRANT OF A TEMPORARY EXEMPTION**

By this instrument, under section 44(2) of the *Age Discrimination Act 2004* (Cth) (ADA), the Australian Human Rights Commission grants an exemption to Carnival plc, trading as Carnival Australia (Carnival), from the operation of section 28 of the ADA.

This exemption is granted for a period of one year from the date of this instrument and is subject to the conditions outlined below.

Summary

Carnival is a cruise company that operates cruises to the Pacific Islands from Australia and New Zealand.

On 7 April 2009, Carnival applied for an exemption under the ADA to implement a strategy for managing security issues, which were arising on its cruises at the time of the 'Schoolies Period'. The core aspects of this strategy, for which the exemption was sought, were, inter alia:

1. requiring that any passengers under the age of 19 years, travelling in the period 1 November to 7 January, be accompanied by a responsible adult (subject to waiver by Carnival) (The Responsible Adult Requirement); and
2. restricting to 60 (subject to any increase at Carnival's discretion) the number of unsupervised passengers under the age of 19 years on-board any cruise in the period 8 January to 31 January (Quota Restriction).

On 23 December 2010, the Commission granted to Carnival an exemption for two and a half years (Initial Exemption).

On 21 June 2013, Carnival applied to the Commission for an extension of the Initial Exemption, on the same terms, for a further period of two and a half years (2013 Exemption). On 15 November 2013 the further exemption was granted subject to the following conditions:

1. Carnival will report to the Commission at the end of the exemption period, how many applications/requests for waiver of the Responsible Adult Requirement it receives for the 1 November – 7 January period and how many of these applications/requests it approves; and
2. Carnival will report to the Commission at the end of the exemption period

- a) how many applications/requests it receives for waiver of the Responsible Adult Requirement during the 8 January – 31 January period, once the quota is filled; and
- b) on how many occasions and to what number it increases the quota.

On 28 October 2016, Carnival again applied to the Commission for an extension of the 2013 Exemption, on the same terms, for a further period of two and a half years.

The Commission notes that the 2013 Exemption expired on 15 May 2016, and further notes that an exemption has not been in place for the most recent 'Schoolies Period' being from 1 November 2016 to 31 January 2017. The Commission asked Carnival to provide a reason for why it did not apply for a further exemption prior to the expiration of the 2013 Exemption. Carnival responded that it did not apply for a further exemption prior to the expiration of the last exemption due to an oversight; however, as soon as it became aware of the error (i.e. in October 2016) it acted to submit an application for renewal of the exemption. Carnival also stated that based on general booking trends over previous 'Schoolies Periods', it expects that a significant number of booking for cruises which were schedule to depart and did depart from 1 November 2016 to 7 January 2017 would have been made prior to the expiry of the 2013 Exemption.

The Commission has decided to grant an exemption, for a period of one year from the date of this notice, subject to the terms and conditions set out below (2017 Exemption).

Background

Carnival relies on the same reasons for seeking this exemption as it relied on in its Initial Exemption application in April 2009 and in its 2013 Exemption application.

In support of the current application, Carnival has included data in accordance with the conditions attached to the grant of its 2013 Exemption and relevant to its implementation of the exemption.

Reasons for initial application

Carnival states that prior to lodging the Initial Exemption application it experienced a high level of alcohol-fuelled and other security incidents on-board its cruises in the traditional 'Schoolies Period', which it defines as 1 November to 31 January (Schoolies Period).

Up until 2006, Carnival operated 'Schoolies' cruises, which were marketed exclusively to passengers aged 16 to 19 years celebrating the end of their high school education. However, these 'Schoolies' cruises became problematic due to the large number of alcohol-related and other security incidents involving a large number of school-leavers (Schoolies). These incidents included serious risks to the health and safety of passengers, crew and the Schoolies participants themselves.

Carnival attempted to reduce the number and severity of these incidents by obtaining the advice of security experts and implementing a range of security measures, such as restricting access to alcohol, increasing security presence on-board its cruises and increasing pre-boarding / on-boarding searches for contraband alcohol. Despite these

various measures, Carnival advised that it continued to experience a large number of alcohol-fuelled incidents involving Schoolies.

Sometime in 2006, Carnival made a decision to discontinue promoting its cruises to school leavers. However, Carnival advised that even after this step was taken, there continued to be large numbers of school-leavers booking cruises and it continued to experience alcohol-fuelled and other 'Schoolies' incidents.

Reasons for further Application

Carnival advises that since the Commission granted the Initial Exemption and the 2013 Exemption, it has observed a significant and continued decrease in the number of alcohol related security incidents during the Schoolies Period. Carnival considers that this decrease is attributed to the Initial Exemption granted by the Commission in 2010 and the further 2013 Exemption granted by the Commission.

By way of an example, Carnival states that:

- in December 2005, it recorded 457 separate security incidents on one cruise-ship, during one cruise;
- in December 2012, it recorded a total of 67 security incidents, across its four cruise-ships and in all cruises for that month;
- In December 2014, it recorded a total of 18 security incidents across six Australian home-ported vessels and across all cruises on those vessels for that month; and
- In December 2015, it recorded a total of 5 security incidents across six Australian home-ported vessels and across all cruises for that month.

Carnival also states that during the period of the 2013 Exemption, it continued to observe a general decrease in the number of customer service complaints from passengers on-board cruises during Schoolies Periods in relation to excessive behaviour engaged in by passengers under the age of 19 years. Carnival also states that the Initial Exemption and the 2013 Exemption has served to:

- discourage Schoolies from making bookings for the purpose of engaging in improper behaviour and under-age drinking;
- reduce the likelihood of unmanageable large-scale 'Schoolies' events organised through means such as social networking; and
- promote an understanding that Carnival cruises will not tolerate improper behaviour and under-age drinking on its cruise-ships as part of the Schoolies Period celebrations.

In seeking the further exemption, Carnival emphasises the primacy of health, safety and security of its crew and passengers. It states that health and safety risks on its cruise-ships are compounded by the following factors:

- the on-board environment contains inherent risks, including risks associated with confined spaces and falling from heights or into the ocean;

- while at sea, its cruise-ships are isolated from emergency medical services and there are limited on-board medical facilities;
- while at sea, it cannot call upon an immediately available police presence;
- there are practical limitations to security personnel numbers which it can accommodate on its cruises;
- on-board security personnel are limited in terms of:
 - their rights to detain, search and control passengers; and
 - the facilities available for detaining passengers who are a threat to themselves and/or others;
- past experience shows that Schoolies participants have a remarkable ingenuity for circumventing its procedures in relation to restricting access to and the consumption of alcohol; and
- past experience shows that Schoolies' celebrations involve large groups organised through school and social networking, and these groups seek to run events/gatherings on-board which are difficult to manage.

Data from the 2013 Exemption period

In support of its 2017 Exemption application, Carnival has provided relevant information for the period 2013 – 2016, in relation to the following matters:

- how many Carnival cruises departed from Australian ports in the Schoolies Period;
- how many young people (aged 16-18 years inclusive) were on-board each of the cruise-ships which departed in the Schoolies Period;
- how many young people, on the cruise-ships which departed in the Schoolies Period, were accompanied by an adult and how many were unaccompanied;
- incidents of anti-social behaviour on its cruise-ships during the Schoolies Period
- how many applications were received by Carnival for a waiver of the Responsible Adult Requirement, and how frequently Carnival waived the Responsible Adult Requirement, in the period 1 November to 7 January; and
- how frequently Carnival increased the 60 passenger quota, applicable in the period 8 January to 31 January and on how many occasions and to what number Carnival increased the quota.

The Commission notes that in its 2013 Exemption application, Carnival provided information for the period 2010 – 2013 in relation to the same matters.

Submissions received by the Commission

Carnival's request for a further temporary exemption was posted on the Commission's website and interested parties were invited to comment on the Application.¹ The Commission also circulated the Application to:

1. all State and Territory anti-discrimination bodies;
2. the New South Wales Police Marine Area Command; and
3. the Alcohol and Other Drugs Council of Australia.

The Commission received three submissions in response to the Application. These are available on the Commission's website.²

The Equal Opportunity Commission of South Australia advised that it had no objection to the Commission granting Carnival a further exemption. The Victorian Equal Opportunity and Human Rights Commission did not express a view on whether the Commission should grant the exemption. The Anti-Discrimination-Board of New South Wales (ADBNSW) made a submission, which did not support the grant of the exemption. The ADBNSW noted that it had also opposed the grant of the exemptions in Carnival's previous applications in 2010 and 2013, and that its position on the matter is essentially unchanged. The ADBNSW's view is that the exemption does not appear to give any benefit to the targeted age group, nor does it appear to reduce disadvantage to them and to that extent, it would appear to be inconsistent with the purposes of the ADA. The ADBNSW noted that, notwithstanding any grant of an exemption, should its President receive a complaint against Carnival that alleges a breach of the *Anti-Discrimination Act 1977* (NSW) on the ground of age, the President would be obliged to investigate the alleged breach.

Relevant Law

The Commission may grant an exemption from the operation of a provision of Division 2 or 3 of Part 4 of the ADA.³ An exemption may be granted subject to terms and conditions specified in the instrument, and may be expressed to apply only in circumstances, or in relation to particular activities, as specified in the instrument.⁴ Exemptions are to be granted for a specified period not exceeding five years.⁵ It is not unlawful for a person to act in accordance with an exemption.⁶

Pursuant to section 28 of the ADA, it is unlawful to discriminate on the ground of age in the provision of goods, services or facilities. This provision is located in Division 3 of Part 4 of the ADA. Therefore, the Commission may grant Carnival an exemption from the operation of section 28 of the ADA.

¹ <http://www.humanrights.gov.au/notice-application-exemption-carnival-australia>

² Ibid.

³ Section 44(1) and (2) of the ADA.

⁴ Section 44(3)(a) and (b) of the ADA.

⁵ Section 44(3)(c).

⁶ Section 47 of the ADA.

Decision and Reasons

The Commission has decided to grant an exemption to Carnival from section 28 of the ADA on the terms set out below, in order to allow Carnival to implement its age restriction policy which has the aim of preventing 'Unauthorised Events' occurring on its cruise-ships.

Carnival's policy defines an 'Unauthorised Event' as any event which may be large in scale and which is associated with excessive or anti-social behaviour, including the abuse of alcohol (Unauthorised Event). Carnival's policy identifies a 'Schoolies Event' as an example of an Unauthorised Event. The Commission notes that the term 'Schoolies Event' generally refers to celebrations by young people who have just finished their last year of high school, or who are celebrating with other young people who have just finished their last year of high school.

Terms and conditions of the Exemption

Terms

Carnival may impose the following restrictions, based on age, in relation to its cruises commencing in Australia:

1. For Carnival cruise-ships departing an Australian port between 1 November 2017 and 7 January 2018, passengers who are under the age of 19 must be accompanied by a responsible adult (Responsible Adult Requirement).

Carnival may, at its sole and absolute discretion, waive the Responsible Adult Requirement where it is satisfied that a specific passenger under the age of 19 does not present a risk of participating in an Unauthorised Event.

Carnival may require any such passenger to sign a code of conduct or provide other commitments as a condition of boarding.

Where the Responsible Adult Requirement is mentioned in Carnival's advertising or online booking system, Carnival will state that it has retained a discretion to waive the Responsible Adult Requirement. Carnival will also state that queries/requests for review in relation to a waiver application decision can be made through its complaints handling process and will publish information about this process.

Carnival will assess each application for waiver of the Responsible Adult Requirement that it receives.

Carnival will adopt/amend its current complaints handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.

2. For Carnival cruise-ships departing an Australian port between 8 January 2018 and 31 January 2018, Carnival will permit a quota of 60 passengers per cruise who are under the age of 19 and not accompanied by a responsible adult. Once this quota is filled, Carnival will apply its Responsible Adult Requirement.

The quota will not include infants and will also not include passengers under the age of 17, where Carnival believes that the minor does not present a risk of

participating in an Unauthorised Event. Carnival will otherwise determine how the quota is filled.

Carnival may, in its sole and absolute discretion, increase this quota where it decides that the increase will not result in a risk to health, safety and security of the passengers and crew, having regard to the purpose of its policy.

Carnival will assess each application for waiver of the Responsible Adult Requirement (where the quota is filled and it becomes applicable).

Carnival will adopt/amend its current complaints handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.

Conditions

This exemption is subject to the following conditions:

Carnival will provide a comprehensive report to the Commission by no later than 30 March 2018, as to:

1. how many applications/requests for waiver of the Responsible Adult Requirement it receives for the 1 November 2017 to 7 January 2018 period and how many of these applications/requests it approves;
2. how many applications/requests it receives for waiver of the Responsible Adult Requirement during the 8 January 2018 to 31 January 2018 period, once the quota is filled;
3. on how many occasions and to what number it increased the quota;
4. how many applicants utilised Carnival's complaints handling process to engage with Carnival further on waiver application decisions;
5. any changes to the number or level of Unauthorised Events;
6. analysis and evidence that any reduction in Unauthorised Events are a direct result of the restrictions based on age;
7. whether, and why, the restrictions continue to be necessary to reduce Unauthorised Events;
8. any alternate methods/strategies to reduce Unauthorised Events that it has implemented or trialled; and
9. the success or otherwise of those methods/strategies.

Period of Exemption

The exemption is granted for one year from the date of this instrument.

Reasons for Decision

The reasons for the Commission's decision to grant the exemption are as follows.

Carnival's policy pursues a legitimate public policy goal and is appropriately targeted in its approach

The Commission accepts Carnival's health, safety and security concerns regarding Schoolies celebrations on its cruises, including:

- the risk of secondary supply of alcohol to passengers under the age of 18 and the difficulty of preventing this. Considering that the secondary supply of alcohol contravenes Carnival's RSA policies and obligations, and raises a significant risk to the health, safety and security of passengers, the Responsible Adult Requirement is an appropriate response to that concern;
- the ability of Schoolies to organise unmanageable large-scale events through means such as social networking;
- the limited capacity of on-board medical facilities in the event of accidents and the risks of accidents occurring (such as falling from heights on a cruise-ship or into the ocean). The Commission also notes the submission of ADCA that general risks associated with young people drinking are compounded by the dangers alcohol may pose in the potentially high-risk marine environment;
- the inability to call upon a police presence in the management of issues which may arise as a result of Unauthorised Events; and
- the limitations facing on-board security personnel in the management of issues which may arise as a result of Unauthorised Events.

The Commission considers that the parameters Carnival has set in relation to the Responsible Adult Requirement make it an appropriately targeted approach, in the short term. Specifically, the Commission has had regard to the Responsible Adult Requirement being:

1. Appropriately targeted in terms of age

The Responsible Adult Requirement is limited to passengers under the age of 19 years and, in respect of the restrictions in the period 8 January – 31 January, it does not include passengers under the age of 17 where Carnival believes that the minor does not present a risk of participating in an Unauthorised Event.

2. Appropriately targeted in terms of its periods of application

The Responsible Adult Requirement is applied more strictly in the period 1 November – 7 January, where passengers under the age of 19 are not able to travel unless accompanied by a responsible adult. This period closely resembles the traditional period for 'Schoolies' celebrations. The Commission notes that during the 2013 Exemption period, Carnival received 19 applications for wavier of the Responsible Adult Requirement of which 13 were approved and 6 were denied. The applications denied were based on Carnival's assessment of risk, and Carnival provides the example of cases where it was concerned about the risk of the

secondary supply of alcohol to minors were the bookings included 18 year old guests with 17 year old guests.

The Responsible Adult Requirement is applied less strictly in the period 8 January – 31 January, during which time Carnival applies the adjustable quota restriction. The Commission notes that during the Initial Exemption period, Carnival has on one occasion increased the quota of 60 to 68 and that it has not been necessary to consider increasing the quota on other occasions as Carnival has not had more than 60 passengers under the age of 19 seek to make bookings during the relevant period. During the 2013 Exemption period, it was not necessary for Carnival to consider increasing the quota as Carnival did not have more than 60 unaccompanied passengers under the age of 19 make bookings during that period.

3. Appropriately targeted in terms of its flexibility in application

Carnival's policy provides for a waiver (at its discretion) of the Responsible Adult Requirement. Carnival will state in its advertising and online booking system that it has retained this waiver discretion.

The Commission understands that Carnival's current practices is to consider exercising its discretion in relation to each application for a waiver of the Responsible Adult Requirement that it receives. That is, Carnival does not assess each and every booking by a passenger under the age of 19, but will assess whether to waive the Responsible Adult Requirement for a booking when it is accompanied by an application for a waiver. Carnival has submitted that it is not in a position to assess every booking on a case by case basis, and this become difficult when Carnival's external agents do the booking. However, where a booking is accompanied by a request for a waiver and a passenger has made a request for an exception to the Responsible Adult Requirement policy, Carnival will assess each of those cases. This practice has been reflected in the terms of the exemption granted by this decision.

In the interest of providing the public with a greater level of information on the operation of the Responsible Adult Requirement, Carnival could provide more easily accessible information about how a potential passenger might submit an application for a waiver, and make Carnival's discretion to waive the Responsible Adult Requirement more transparent. For example, Carnival could do this by placing a clear link to a waiver application form on the bookings page of its website so as to allow potential passengers to more easily apply for a waiver of the Responsible Adult Requirement.

The ability to waive the Responsible Adult Requirement recognises that there will be passengers under the age of 19 who do not present a risk of participating in an Unauthorised Event and thus should not be subject to the limitation.

4. Allows for a process of review

Under the terms of the exemption granted by this decision, Carnival will facilitate and engage in a review process that allows a potential passenger, who has applied to be exempt from the Responsible Adult Requirement policy, to further engage with Carnival if they are dissatisfied with Carnival's initial assessment of their waiver application.

Carnival will adopt/amend its current complaints handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.

In the interest of making this review mechanism transparent, Carnival will state in its advertising materials and online booking system, that queries or requests for review in relation to a waiver application decision can be made through its complaints handling process and will publish information that is easily and readily accessible about this process.

The Commission understands that Carnival has current complaint handling processes in place more generally, and that Carnival does not foresee any major difficulties in facilitating reviews and further engagement with passengers in relation to decisions concerning the waiver of the Responsible Adult Requirement.

Carnival's policy is a reasonable measure having regard to the objects of the ADA

In making a determination on a temporary exemption application under the ADA, the Commission has regard to the objects of the ADA. The objects of the ADA include seeking to eliminate, as far as possible, discrimination against persons on the ground of age in a range of areas, including provision of goods, services or facilities.

The Commission recognises that Carnival's policy allows conduct which is inconsistent with the objects of the ADA. While this is a factor weighing against the grant of the exemption sought,⁷ it does not mean that the Commission cannot grant the exemption. In line with the Commission's Guidelines on the granting of a temporary exemption under the ADA, the Commission has assessed:

1. 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; and
2. whether the exemption could be granted subject to terms and conditions which further the objects of the ADA.

In undertaking this assessment, the Commission has considered the following:

1. Carnival's legitimate concerns about controlling the consumption of alcohol on-board its cruises and its previous difficulties in managing the health, safety and security issues associated with 'Schoolies' celebrations;
2. Carnival's submissions regarding the effectiveness of the Initial Exemption and 2013 Exemption in reducing security incidents on-board its cruises;
3. Carnival has minimised the discriminatory impact of its policy by making it appropriately targeted in its application (noting the parameters of the Responsible Adult Requirement, discussed above) and has thereby limited its discriminatory effect;
4. Carnival's application of the Responsible Adult Requirement during the Initial Exemption period and 2013 Exemption period shows that Carnival has:

⁷ Australian Human Rights Commission, *Temporary Exemptions Under the Age Discrimination Act: Commission Guidelines* (2010), section 3(b).

- a) in relation to the 1 November – 7 January period, exercised its discretion to waive the Responsible Adult Requirement for people under the age of 19; and
- b) in relation to the 8 January – 31 January period, increased the quota in one case.

This indicates that Carnival has at least in some cases accommodated the individual circumstances of particular young people and this contributes to the reasonableness of the policy;

5. The terms of this exemption, that Carnival will state in its advertising and online booking system the existence of its discretion to waive the Responsible Adult Requirement, will further reduce the discriminatory impact of the exemption as young people will be aware of the flexible operation of Carnival's age restriction policy; and
6. The terms of this exemption, that:
 - a) Carnival will facilitate a process of review to allow potential passengers who are dissatisfied with an initial assessment on a waiver application to further engage with Carnival on the matter; and
 - b) Carnival will publish information about this process in its advertising and online booking system

will further reduce the discriminatory impact of the exemption as young people will be able to engage with Carnival, in good faith, which will promote a more transparent and flexible operation of Carnival's age restriction policy.

The period of exemption

The Commission notes that Carnival's Responsible Adult Requirement and Quota Restriction, have been in place since the grant of the Initial Exemption in 2010, and has captured six Schoolies Periods so far.

As outlined above, Carnival has provided convincing data showing that over the course of the Initial Exemption period and the 2013 Exemption period there has been a significant decrease in alcohol-fuelled and other security incidents on board Carnival cruises during the Schoolies Period. The Commission accepts that the Responsible Adult Requirement has had a significant impact on bringing about this result, and this may be particularly so in the early years of its operation.

However, there is no current data to show whether the restrictions allowed by the exemptions continue to be the only factor, or the predominant factor, in the decrease of security incidents on board the cruises operating in the Schoolies Periods. Especially in more recent years, there could feasibly be other factors contributing to the results provided by Carnival.

The Commission understands that Carnival has not thus far been required to test whether factors outside of the Responsible Adult Requirement and Quota Restriction have contributed to the decrease in alcohol-related security incidents.

The Commission notes that exemptions are commonly granted to allow time, where necessary, to make changes to comply with anti-discrimination legislation. As an exemption has been in place since 2010, the Commission has decided to limit the grant of the 2017 Exemption to a period of one year. This is to allow Carnival to consider whether there is an ongoing necessity for an exemption from section 28 of the ADA, and whether there are other means of achieving its purpose with a view to the longer term.

In light of the above and in the event that Carnival does wish to apply to the Commission for a further exemption upon the expiry of the 2017 Exemption, the Commission will require Carnival to provide a comprehensive report as to:

1. any changes to the number or level of Unauthorised Events;
2. analysis and evidence that any reduction in Unauthorised Events are a result of the restrictions based on age;
3. whether, and why, the restrictions continue to be necessary to reduce Unauthorised Events;
4. any alternate methods/strategies to reduce Unauthorised Events that it has implemented or trialled; and
5. the success or otherwise of those methods/strategies.

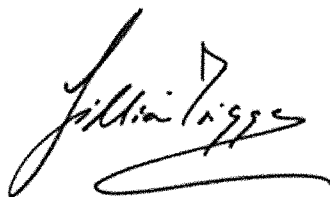
Conclusion

The Commission concludes that Carnival's policy is a reasonable measure which should be permitted for a period of one year, having weighed up the nature and extent of the discriminatory effect against the reasons in favour of the exemption.

Application For Review

Subject to the *Administrative Appeals Tribunal Act 1975* (Cth), any person whose interests are affected by this decision may apply to the Administrative Appeals Tribunal for a review of the decision.

Dated this 22nd day of June 2017.

A handwritten signature in black ink, appearing to read 'Gillian Triggs', with a stylized flourish at the end.

Signed by the President, Professor Gillian Triggs, on behalf of the Commission.

**AUSTRALIAN HUMAN RIGHTS COMMISSION
AGE DISCRIMINATION ACT 2004 (CTH), S 44(1)
NOTICE OF GRANT OF A TEMPORARY EXEMPTION**

By this instrument, under section 44(1) of the *Age Discrimination Act 2004* (Cth) (ADA), the Australian Human Rights Commission grants an exemption to Carnival plc, trading as Carnival Australia (Carnival), from the operation of section 28 of the ADA.

This exemption is granted for a period of three years from the date of this instrument and is subject to the conditions outlined below.

1 The Application

Carnival is a cruise company that operates cruises to the Pacific Islands from Australia and New Zealand.

On 7 April 2009, Carnival applied for an exemption under the ADA to implement a strategy for managing security issues, which were arising on its cruises in the period of 1 November to 31 January each year (Schoolies Period). The core aspects of this strategy, for which the exemption was sought, were, inter alia:

1. requiring that any passengers under the age of 19 years, travelling in the period 1 November to 7 January, be accompanied by a responsible adult (subject to waiver by Carnival) (The Responsible Adult Requirement)
2. restricting to 60 (subject to any increase at Carnival's discretion) the number of unsupervised passengers under the age of 19 years on-board any cruise in the period 8 January to 31 January (Quota Restriction).

Carnival submitted that its age restriction policy had the aim of preventing 'Unauthorised Events' occurring on its cruise-ships. Carnival's policy defines an 'Unauthorised Event' as any event which may be large in scale and which is associated with excessive or anti-social behaviour, including the abuse of alcohol (Unauthorised Event). Carnival's policy identifies a 'Schoolies Event' as an example of an Unauthorised Event. The Commission notes that the term 'Schoolies Event' generally refers to celebrations by young people who have just finished their last year of high school, or who are celebrating with other young people who have just finished their last year of high school (Schoolies Event). The term 'Schoolies' refers to a group of young people who have just finished high school and are typically 16 to 19 years of age (Schoolies).

On 23 December 2010, the Commission granted to Carnival an exemption for two and a half years (Initial Exemption).

On 21 June 2013, Carnival applied to the Commission for an extension of the Initial Exemption, on the same terms, for a further period of two and a half years. On 15 November 2013, the further exemption was granted (2013 Exemption).

On 28 October 2016, Carnival applied to the Commission for an extension of the 2013 Exemption, on the same terms, for a further period of two and a half years .

On 22 June 2017, an exemption was granted for a one year period on similar terms as the 2013 Exemption (2017 Exemption), with the additional requirements that:

Where the Responsible Adult Requirement is mentioned in Carnival's advertising or online booking system, Carnival will state that it has retained a discretion to waive the Responsible Adult Requirement. Carnival will also state that queries/requests for review in relation to a waiver application decision can be made through its complaints handling process and will publish information about this process. Carnival will assess each application for waiver of the Responsible Adult Requirement that it receives.

Carnival will adopt/amend its current complaints handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.

The 2017 Exemption was granted subject to the condition that Carnival would provide a report to the Commission as to the following:

1. how many applications/requests for waiver of the Responsible Adult Requirement it receives for the 1 November 2017 to 7 January 2018 period and how many of these applications/requests it approves
2. how many applications/requests it receives for waiver of the Responsible Adult Requirement during the 8 January 2018 to 31 January 2018 period, once the quota is filled
3. on how many occasions and to what number it increased the quota
4. how many applicants utilised Carnival's complaints handling process to engage with Carnival further on waiver application decisions
5. any changes to the number or level of Unauthorised Events
6. analysis and evidence that any reduction in Unauthorised Events are a direct result of the restrictions based on age

7. whether, and why, the restrictions continue to be necessary to reduce Unauthorised Events
8. any alternate methods/strategies to reduce Unauthorised Events that it has implemented or trialled
9. the success or otherwise of those methods/strategies.

On 20 June 2018, Carnival applied to the Commission for an extension of the 2017 Exemption, on substantially the same terms as the 2017 Exemption, for a further period of five years.

2 Decision of the Commission

After an extensive period of consultation with Carnival, the Commission has decided to grant an exemption for a period of three years from the date of this notice, subject to the terms and conditions set out below (2019 Exemption).

3 Considerations

In reaching its decision, the Commission considered the following:

- The application and submissions by Carnival dated 29 June 2018
- Carnival's report to the Commission, as required by the conditions of the 2017 Exemption, dated 29 March 2018
- Applications and submissions by Carnival in relation to previous exemption applications that Carnival stated it relied upon
- All information provided by Carnival in response to the Commission's requests for further information
- Submissions from other interested parties.

These documents are available on the Commission's website at:

<https://www.humanrights.gov.au/our-work/legal/exemptions>

In reaching its decision, the Commission had regard to the following:

- The terms and objects of the ADA
- *The Commission Guidelines: Exemption applications under the Age Discrimination Act 2004 (Cth)*.

4 Background

Carnival relies on substantially the same reasons for seeking this exemption as it relied on in its previous applications.

In support of the current application, Carnival has included data in accordance with the conditions attached to the grant of its 2017 Exemption and relevant to its implementation of the exemption. Carnival has also provided the Commission with additional information and data as requested by the Commission in its consultation with Carnival.

4.1 Reasons for initial application

Carnival states that prior to lodging the Initial Exemption application it experienced a high level of alcohol-fuelled and other security incidents on-board its cruises in the traditional Schoolies Period.

Up until 2006, Carnival operated Schoolies cruises, which were marketed exclusively to passengers aged 16 to 19 years celebrating the end of their high school education. However, these Schoolies cruises became problematic due to the large number of alcohol-related and other security incidents involving a large number of school-leavers. These incidents included serious risks to the health and safety of passengers, crew and the Schoolies participants themselves.

Carnival attempted to reduce the number and severity of these incidents by obtaining the advice of security experts and implementing a range of security measures, including the following:

- Increasing security presence on-board—including contracting 60 security personnel and two trained investigators across its cruise-ships
- Screening for and confiscation of alcohol at embarkation using screening devices (all guests screened)
- Drug screening on embarkation using screening devices and drug sniffer dogs (all guests screened)
- 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 secured with metal clips to identify guests aged 18 years and over, and attempting to police the secondary supply of alcohol
- Tightening its policies and procedures in relation to the access and consumption of alcohol, including providing certain on-board bars

designated as alcohol free bars, and limiting guests to the purchase of a maximum of 2 drinks at any visit to the bar

- Enhancing the training and instruction of its crew in relation to the above procedures, including additional Responsible Service of Alcohol enforcement duties for all staff.

Despite these various measures, Carnival advised that it continued to experience a large number of alcohol-fuelled incidents involving Schoolies. Carnival advised that 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 at ports before re-boarding the ship. Carnival further advised that there were also incidents where Schoolies participants pre-arranged fights and rioting which had not necessarily been fuelled by alcohol.

In 2006, Carnival decided to discontinue promoting its cruises to school leavers. However, Carnival advised that even after this step was taken, there continued to be large numbers of school-leavers booking cruises and it continued to experience alcohol-fuelled and other Schoolies incidents.

4.2 Reasons for further applications

Carnival advises that since the Commission granted the Initial Exemption, it has observed a significant and continued decrease in the number of alcohol related security incidents during the Schoolies Period. Carnival considers that this decrease is attributed to the Initial Exemption granted by the Commission in 2010 and the further 2013 and 2017 Exemptions granted by the Commission.

By way of an example, Carnival states that:

- in December 2005, it recorded 457 separate security incidents on one cruise-ship, during one cruise
- in December 2012, it recorded a total of 67 security incidents, across its four cruise-ships and in all cruises for that month
- In December 2014, it recorded a total of 18 security incidents across six Australian home-ported vessels and across all cruises on those vessels for that month
- In December 2015, it recorded a total of five security incidents across six Australian home-ported vessels and across all cruises on those vessels for that month

- In December 2017, it recorded a total of 13 security incidents across seven Australian home-ported vessels and across all cruises on those vessels for that month.

Carnival also states that since the Initial Exemption, it continues to observe a general decrease in the number of customer service complaints from passengers' on-board cruises during Schoolies Periods in relation to excessive behaviour engaged in by passengers under the age of 19 years.

Carnival also states that the exemptions have served to:

- discourage Schoolies from making bookings for the purpose of engaging in improper behaviour and under-age drinking
- reduce the likelihood of unmanageable large-scale Schoolies events organised through means such as social networking
- promote an understanding that Carnival cruises will not tolerate improper behaviour and under-age drinking on its cruise-ships as part of the Schoolies Period celebrations.

In seeking this further exemption, Carnival emphasises the primacy of health, safety and security of its crew and passengers. It states that health and safety risks on its cruise-ships are compounded by the following factors which Carnival submit are as relevant today as they were at the time Carnival applied for its first exemption:

- the on-board environment contains inherent risks, including risks associated with confined spaces and falling from heights or into the ocean
- cruise-ships are unique environments where guests can move freely between venues on-board the ship, such as bars, restaurants, theatres, outside decks and their cabins. Guests can move around the ship with food and beverages, for example, a drink purchased at a bar could then be taken into a theatre to watch a show or consumed in a guest's cabin
- while at sea, its cruise-ships are isolated from emergency medical services and there are limited on-board medical facilities
- while at sea, it cannot call upon an immediately available police presence
- there are practical limitations to security personnel numbers which it can accommodate on its cruises, more specifically:
 - there are limited staff cabins and staff facilities on-board
 - security personnel are required to complete highly specialised training in accordance with all relevant maritime laws, and Carnival

has a limited pool of security personnel available with the requisite training

- on-board staff must have the required visas, vaccinations and travel documentation available before joining a ship, and therefore it is difficult to increase staff members in emergency circumstances or with limited notice
- on-board security personnel are limited in terms of:
 - their rights to detain, search and control passengers
 - the facilities available for detaining passengers who are a threat to themselves and/or others
- past experience shows that Schoolies participants have a remarkable ingenuity for circumventing its procedures in relation to restricting access to and the consumption of alcohol—Carnival states that contraband alcohol has been detected on-board in Listerine mouthwash bottles, shampoo bottles and in sealed soft drink cans
- the legal drinking age in many ports of call in the Pacific Islands is below 18 years of age, and minors may be legally permitted to purchase and consume alcohol while Carnival's ships are in port. Some ports of call have local traditions that involve consuming products containing narcotics, for example, drinking kava in Pacific Island nations. Carnival notes that it has no ability to control a guest's behaviour in port, and it also cannot refuse to allow a passenger to re-board its ship as disembarkation of a passenger can be complex where it involves repatriation
- past experience shows that Schoolies celebrations involve large groups organised through school and social networking, and these groups seek to run events/gatherings on-board which are difficult to manage.

4.3 Data from the 2017 Exemption period

Carnival's report to the Commission dated 29 March 2018 (provided pursuant to clause 5.1(b) of the 2017 Exemption Grant Notice) and Carnival's current exemption application, dated 29 June 2018, relevantly contained the following information:

- The 2017 Exemption required Carnival to create a complaint handling mechanism to allow applicants who were dissatisfied with Carnival's initial assessment on a waiver application, to further engage with Carnival on the matter.

Carnival states that during the 1 November 2017 to 7 January 2018 period, it received 15 applications for waiver of the Responsible Adult Requirement, of which five were approved and ten were denied. The applications denied were based on Carnival's assessment of the risk, including where:

- a) 18 year old guests were travelling with 17 year old guests with the inherent risk of secondary supply of alcohol to minors; and
- b) more than one cabin of 18 year old guests requested to travel together.

Carnival had two applicants utilise the complaint handling process to engage with Carnival further on waiver application decisions. These two applicants were ultimately granted waiver approval and are part of the five applications which were approved in total. These two cases were escalated to Carnival's Head of Customer Service for further assessment, and where necessary, assurances from parents/legal guardians were sought prior to a waiver being approved.

- Carnival states that there were no requests for a waiver of the Responsible Adult Requirement in the 8 January 2018 to 31 January 2018 period, as the quota of 60 unaccompanied passengers under the age of 19 was not reached for any of Carnival's cruises which departed during that period.
- Carnival states that there were some isolated security incidents involving guests aged 17 to 19 between 1 November 2017 and 31 January 2018, but Carnival does not consider these incidents to be attributed to large scale Unauthorised Events or excessive behaviour engaged in by groups.
- Carnival submits that the restrictions permitted under the 2017 Exemption continue to be necessary due to its ongoing concern for the health, safety and security of its crew and passengers. Carnival emphasises that land-based Schoolies events have the benefit of substantial support from emergency services and government departments in preventing and responding to incidents. For example, the Gold Coast benefits from having Police, Ambulance, Fire and Rescue, SES, Queensland Health, the Education Department and local Councils involved. These support services are not available to cruise-ships.
- Carnival believes that the most responsible course of action is to try and manage the risk at the booking phase, rather than the point at which Unauthorised Events involving large groups occur on-board its ships, hence its view that there is a continued need for its Responsible Adult Requirement policy.

- Carnival submits that there continues to be a strong demand for Schoolies cruises, and cruises operating during the Schoolies Period (albeit not promoted as Schoolies Cruises) continue to be a popular option for school leavers when choosing a destination for their end of school celebrations. Carnival provided an online report dated 16 February 2018, of a third party travel supplier advertising and promoting a cruise operated by a major cruise line brand as a 'Schoolies Cruise'. Carnival asserts that this was done without the knowledge or authorisation of that cruise line brand. Carnival also provides evidence of that same third party supplier advertising Schoolies packages and deals for 2018 and 2019 on its website. Carnival provides these examples in support of its submission that cruises are still a popular option for school leavers. Carnival further submits that without an exemption, Carnival will have no control over the promotion by third parties (such as travel agents) of its cruises which operate during the Schoolies Period.

Carnival has also provided relevant information for each Schoolies period from 2010 to 2018 in relation to the following matters:

- how many Carnival cruises departed from Australian ports in the Schoolies Period
- how many young people (aged 16 to 18 years inclusive) were on-board each of the cruise-ships which departed in the Schoolies Period
- how many young people, on the cruise-ships which departed in the Schoolies Period, were accompanied by an adult and how many were unaccompanied
- incidents of anti-social behaviour on its cruise-ships during the Schoolies Period
- how many applications were received by Carnival for a waiver of the Responsible Adult Requirement, and how frequently Carnival waived the Responsible Adult Requirement, in the period 1 November to 7 January
- how frequently Carnival increased the 60 passenger quota, applicable in the period 8 January to 31 January and on how many occasions and to what number Carnival increased the quota.

5 Submissions received by the Commission

Carnival's request for a further exemption was posted on the Commission's website and interested parties were invited to comment on the application.¹ The Commission also circulated the application to:

1. all State and Territory anti-discrimination bodies
2. the New South Wales Police Marine Area Command
3. the Alcohol and Other Drugs Council of Australia.

The Commission received a response from the Victorian Equal Opportunity and Human Rights Commission (VEOHRC). The VEOHRC did not express a view in relation to Carnival's application for an exemption, however it noted that it would seek to write to Carnival to advise Carnival to seek an exemption through VEOHRC from relevant Victorian anti-discrimination legislation. No other submissions were received. The Anti-Discrimination Board of New South Wales (ADBNSW) did not make a submission in relation to Carnival's current application, however the Commission notes that the ADBNSW has, in relation to Carnival's previous applications in 2010, 2013 and 2017, expressed the view that it does not support the grant of the exemption. The ADBNSW's view has been that the exemption does not appear to give any benefit to the targeted age group, nor does it appear to reduce disadvantage to them and to that extent, it would appear to be inconsistent with the purposes of the ADA. The ADBNSW has previously noted that, notwithstanding any grant of an exemption, should its President receive a complaint against Carnival that alleges a breach of the *Anti-Discrimination Act 1977* (NSW) on the ground of age, the President would be obliged to investigate the alleged breach.

6 Relevant law

The Commission may grant an exemption from the operation of a provision of Division 2 or 3 of Part 4 of the ADA.² An exemption may be granted subject to terms and conditions specified in the instrument, and may be expressed to apply only in circumstances, or in relation to particular activities, as specified in the instrument.³ Exemptions are to be granted for a specified period not exceeding

¹ <http://www.humanrights.gov.au/notice-application-exemption-carnival-australia>

² Section 44(1) and (2) of the ADA.

³ Section 44(3)(a) and (b) of the ADA.

five years.⁴ It is not unlawful for a person to act in accordance with an exemption.⁵

Pursuant to section 28 of the ADA, it is unlawful to discriminate on the ground of age in the provision of goods, services or facilities. This provision is located in Division 3 of Part 4 of the ADA. Therefore, the Commission may grant Carnival an exemption from the operation of section 28 of the ADA.

7 Decision and reasons

The Commission has decided to grant an exemption to Carnival from section 28 of the ADA on the terms set out below, in order to allow Carnival to implement its age restriction policy which has the aim of preventing Unauthorised Events occurring on its cruise-ships.

7.1 Terms and conditions of the Exemption

(a) Terms

Carnival may impose the following restrictions, based on age, in relation to its cruises commencing in Australia:

1. For Carnival cruise-ships departing an Australian port between 1 November and 7 January, Carnival will permit a quota of 20 passengers per cruise who are under the age of 19 and not accompanied by a responsible adult. Once this quota is filled, Carnival will require passengers who are under the age of 19 to be accompanied by a responsible adult (Responsible Adult Requirement).
2. For Carnival cruise-ships departing an Australian port between 8 January and 31 January, Carnival will permit a quota of 60 passengers per cruise who are under the age of 19 and not accompanied by a responsible adult. Once this quota is filled, Carnival will apply its Responsible Adult Requirement.
3. The quotas, in 1 and 2 above, will not include infants and will also not include passengers under the age of 17 where Carnival considers that the minor does not present a risk of participating in an Unauthorised Event. Carnival will otherwise determine how the quota in each period is filled.

⁴ Section 44(3)(c).

⁵ Section 47 of the ADA.

Carnival may, in its sole and absolute discretion, increase the quota in either or both periods, where it decides that the increase will not result in a risk to health, safety and security of the passengers and crew, having regard to the purpose of its policy.

Carnival may, at its sole and absolute discretion, waive the Responsible Adult Requirement where it is satisfied that a specific passenger under the age of 19 does not present a risk of participating in an Unauthorised Event. Carnival may require any such passenger to sign a code of conduct or provide other commitments as a condition of boarding.

Where the Responsible Adult Requirement is mentioned in Carnival's advertising or online booking system, Carnival will clearly state that it can decide to waive the Responsible Adult Requirement. Carnival will state that prospective passengers can apply to Carnival for a waiver of the Responsible Adult Requirement and will provide information about how an application for a waiver can be lodged. Carnival will provide clear publicly available information regarding the factors it considers when making decisions about waiver applications. This information will be provided at the time of booking. Carnival will also state that requests for review in relation to a waiver application decision can be made through its complaint handling process and will publish information about this process.

Carnival will assess each application for waiver of the Responsible Adult Requirement that it receives (when the relevant quota is filled, and it becomes applicable).

Carnival will continue operating its complaint handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.

(b) Conditions

Carnival will provide a report to the Commission by no later than 1 June 2022, as to:

1. how many applications/requests for waiver of the Responsible Adult Requirement it receives for the 1 November to 7 January period in each year that this exemption operates, and how many of these applications/requests it approves
2. how many applications/requests it receives for waiver of the Responsible Adult Requirement during the 8 January to 31 January

period in each year that this exemption operates, and how many of these applications/requests it approves

3. on how many occasions and to what number it increased the quotas, and reasons for the exercise of this discretion
4. how many applicants utilised Carnival's complaints handling process each year to engage with Carnival further on waiver application decisions, and the outcomes of that process
5. any changes to the number or level of Unauthorised Events
6. the details of the publicly available information published by Carnival in relation to:
 - i. Carnival's discretion to waive the Responsible Adult Requirement, and information regarding how a prospective passenger can apply for a waiver
 - ii. factors Carnival considers when making decisions about waiver applications
 - iii. the process for requesting a review in relation to a waiver application decision
7. whether, and why, the restrictions continue to be necessary to reduce Unauthorised Events
8. any new methods/strategies to reduce Unauthorised Events that it has implemented or trialled over the course of this exemption period
9. the success or otherwise of those methods/strategies to meet its objectives.

(c) Period of Exemption

The exemption is granted for three years from the date of this instrument.

7.2 Reasons for decision

The reasons for the Commission's decision to grant the exemption are as follows.

(a) *Carnival's policy pursues a legitimate public policy goal and is appropriately targeted in its approach*

The Commission accepts Carnival's submissions in relation to the health, safety and security concerns that arise at Schoolies celebrations on its cruises, including:

- the risk of secondary supply of alcohol to passengers under the age of 18 and the difficulty of preventing this. The secondary supply of alcohol contravenes Carnival's Responsible Service of Alcohol policies and obligations, and raises a significant risk to the health, safety and security of passengers.
- the limited capacity of on-board medical facilities in the event of accidents and the risks of accidents occurring (such as falling from heights on a cruise ship or into the ocean)
- the inability to control passengers' behaviour while in port, and the complexities involved in refusing to allow a passenger to re-board a ship where repatriation is involved
- the inability to call upon a police presence in the management of issues which may arise as a result of Unauthorised Events
- the limitations facing on-board security personnel in the management of issues which may arise as a result of Unauthorised Events
- the ability of Schoolies to organise unmanageable large-scale events through means such as social networking.

The Commission notes that Carnival has had an exemption from section 28 of the ADA since 2010. During this period, Carnival has collected data relevant to its application. This data reveals that:

- the number of Unauthorised Events has significantly decreased during the time that an exemption has been in place
- in the 2017 Exemption period, Carnival received 15 applications requesting a waiver of the Responsible Adult Requirement, and in the 2013 Exemption period, Carnival received 19 applications for waiver of the Responsible Adult Requirement
- the quota of 60 unaccompanied passengers was not reached on any cruises during the 2013 and 2017 Exemption periods—this quota was reached on only one occasion, in the Initial Exemption period.

In the circumstances, the Commission considered that it may be possible to narrow the scope of the exemption and still address Carnival's health, safety and security concerns.

The Commission consulted with Carnival to ensure the terms of any further exemption were appropriately targeted. This exemption is granted subject to terms that require a narrower operation of Carnival's age restriction policy, compared to previous years that an exemption has been in place. The principal change is that Carnival will permit a quota of 20 passengers per cruise, in the 1 November to 7 January period, who are under the age of 19 and not accompanied by a responsible adult. Once this quota is filled, Carnival will require passengers who are under the age of 19 to be accompanied by a responsible adult. In previous exemptions, the Responsible Adult Requirement has been applied throughout the 1 November to 7 January period without an adjustable quota—i.e. all passengers under the age of 19 years were restricted from travelling unless accompanied by a responsible adult.

The Commission considers that the parameters set in relation to the adjustable quotas and the Responsible Adult Requirement in this 2019 Exemption make it an appropriately targeted approach. Specifically, the Commission has had regard to Carnival's policy being:

1. Appropriately targeted in terms of age

The Responsible Adult Requirement is limited to passengers under the age of 19 years and it does not include passengers under the age of 17 where Carnival believes that the minor does not present a risk of participating in an Unauthorised Event.

2. Appropriately targeted in terms of its periods of application and method of application

The 1 November to 7 January period closely resembles the traditional period of Schoolies celebrations. Under this exemption, Carnival will apply an adjustable quota, to allow 20 guests under the age of 19 to travel without a responsible adult during this period.

Carnival submits that for the 2018–2019 Schoolies season (the last Schoolies period), the average number of unaccompanied passengers aged 17 to 19 years, who sailed between 1 November 2018 to 7 January 2019, was six. For the 2018–2019 Schoolies season, the average number of unaccompanied passengers aged 17 to 19 years, who sailed between 8 January to 31 January, was 21. The latter statistic suggests that Carnival can safely accommodate approximately 20 passengers aged 17 to 19 years and who are not accompanied by an adult. Therefore, in this exemption, the quota introduced for the 1 November to 7 January period has been set

at 20 passengers per cruise where travel is not restricted by the Responsible Adult Requirement. This should allow a greater number of passengers under the age of 19 to travel unaffected by the Responsible Adult Requirement in the 1 November to 7 January period, relative to previous years that an exemption has been in place.

The Responsible Adult Requirement is applied less strictly in the 8 January to 31 January period, during which time Carnival applies an adjustable quota to allow 60 guests under the age of 19 to travel without a responsible adult. The Commission notes that, since 2010, during the Initial Exemption period, Carnival has on one occasion increased the quota of 60 to 68 and that it has not been necessary to consider increasing the quota on other occasions as Carnival has not had more than 60 passengers under the age of 19 seek to make bookings during the 8 January to 31 January period. It appears that in practice, the restriction in the 8 January to 31 January period has little to no discriminatory impact. The restriction remains in place as a precautionary measure.

The 1 November to 7 January period is the peak Schoolies Period where most Schoolies celebrations take place. Carnival submits that it is appropriate for a stricter quota to be applied in this period. Carnival further states that it cannot usefully draw on its experience in the 8 January to 31 January period to assess potential risks because the number of unaccompanied 17 to 19 year old passengers have not frequently been in the range of 60, the current average being 21 unaccompanied passengers per cruise in this period.

The quota of 20 unaccompanied passengers under the age of 19 years in the 1 November to 7 January period appears to strike an appropriate balance that minimises the discriminatory impact of Carnival's age restriction policy, while accommodating Carnival's health, safety and security concerns.

3. Appropriately targeted in terms of its flexibility in application

Carnival's policy provides for a waiver (at its discretion) of the Responsible Adult Requirement. Carnival will state in its advertising and online booking system that it has retained this waiver discretion. Carnival will also state that prospective passengers can apply to Carnival for a waiver of the Responsible Adult Requirement and will provide information about that process.

The Commission understands that Carnival's current practice is to consider exercising its discretion in relation to each application for a waiver of the Responsible Adult Requirement that it receives. That is, Carnival does not assess each and every booking by a passenger under

the age of 19 but will assess whether to waive the Responsible Adult Requirement for a booking when it is accompanied by an application for a waiver. Carnival has submitted that it is not in a position to assess every booking on a case by case basis, and this becomes difficult when Carnival's external agents do the booking. However, where a booking is accompanied by a request for a waiver and a passenger has made a request for an exception to the Responsible Adult Requirement policy, Carnival will assess each of those cases. This practice has been reflected in the terms of the exemption granted by this decision.

As noted above, during the 2013 Exemption period, Carnival received 19 applications for waiver of the Responsible Adult Requirement of which 13 were approved and six were denied. In the 2017 Exemption period, Carnival received 15 waiver applications, of which five were approved and ten were denied. The applications denied were based on Carnival's assessment of risk, and Carnival provides the example of cases where it was concerned about the risk of the secondary supply of alcohol to minors where the bookings included 18 year old guests with 17 year old guests.

The ability to waive the Responsible Adult Requirement recognises that there will be passengers under the age of 19 who do not present a risk of participating in an Unauthorised Event and thus should not be subject to the limitation.

4. Allows for a process of review

Under the terms of the exemption granted by this decision, Carnival will facilitate and engage in a review process that allows a potential passenger, who has applied to be exempt from the Responsible Adult Requirement policy, to further engage with Carnival if they are dissatisfied with Carnival's initial assessment of their waiver application.

The 2017 Exemption required Carnival to adapt its existing complaints handling mechanism to allow applicants who were dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter. In the 2017 Exemption period, two applicants utilised the complaints handling process to engage with Carnival further on waiver application decisions. These two applicants were ultimately granted waiver approval. These two cases were escalated to Carnival's Head of Customer Service for further assessment, and where necessary, assurances from parents/legal guardians were sought prior to a waiver being approved. It appears that Carnival participated in that review process in good faith.

5. Allows for greater transparency

In the interest of providing the public with a greater level of information on the operation of the Responsible Adult Requirement, Carnival will state in its advertising and online booking system that it can waive the Responsible Adult Requirement. Carnival will also state that prospective passengers can apply for a waiver and will provide information about that process.

The terms of this exemption also require Carnival to provide clear publicly available information regarding the factors it considers when making decisions about waiver applications. This will allow for a greater level of transparency around Carnival's decision making considerations.

This information is to be collectively provided at the time of booking.

As in the 2017 Exemption, in the interest of making Carnival's review mechanism transparent and accessible, Carnival will state in its advertising materials and online booking system, that queries or requests for review in relation to a waiver application decision can be made through its complaints handling process and will publish information that is easily and readily accessible about this process.

(b) Carnival's policy is a reasonable measure having regard to the objects of the ADA

In making a determination on a temporary exemption application under the ADA, the Commission has regard to the objects of the ADA. The objects of the ADA include seeking to eliminate, as far as possible, discrimination against persons on the ground of age in a range of areas, including provision of goods, services or facilities.

The Commission recognises that Carnival's policy allows conduct which is inconsistent with the objects of the ADA. While this is a factor weighing against the grant of the exemption sought,⁶ it does not mean that the Commission cannot grant the exemption. In line with the Commission's Guidelines on the granting of a temporary exemption under the ADA, the Commission has assessed:

1. 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

⁶ Australian Human Rights Commission, *Temporary Exemptions Under the Age Discrimination Act: Commission Guidelines* (2010), section 3(b).

2. whether the exemption could be granted subject to terms and conditions which further the objects of the ADA.

In undertaking this assessment, the Commission has considered the following:

1. Carnival's concerns about controlling the consumption of alcohol on-board its cruises and its previous difficulties in managing the health, safety and security issues associated with Schoolies celebrations.
2. Carnival's submissions regarding the effectiveness of the Initial Exemption, 2013 Exemption and 2017 Exemption in reducing security incidents on-board its cruises.
3. Carnival has minimised the discriminatory impact of its policy by making it appropriately targeted in its application (noting the parameters of the Responsible Adult Requirement, and the introduction of an adjustable quota in the 1 November to 7 January period such that there is no discrimination against 20 passengers under the age of 19 years on any cruise in the relevant period, discussed above).
4. Carnival's application of the Responsible Adult Requirement during the Initial Exemption, 2013 Exemption, and 2017 Exemption periods show that Carnival has:
 - a) in relation to the 1 November to 7 January period, exercised its discretion to waive the Responsible Adult Requirement for people under the age of 19
 - b) in relation to the 8 January to 31 January period, increased the quota in one case.

This indicates that Carnival has, at least in some cases, accommodated the individual circumstances of particular young people and this contributes to the reasonableness of the policy.

5. The terms of this exemption, that:
 - a) Carnival will state in its advertising and online booking system that it can decide to waive the Responsible Adult Requirement, and that prospective passengers can apply for a waiver
 - b) Carnival will provide information regarding the factors it considers when making decisions about waiver applications

will further reduce the discriminatory impact of the exemption as young people will be aware of the flexible operation of Carnival's age restriction

policy and will be aware that they can apply to be exempt from the operation of the policy.

6. The terms of this exemption, that:

- a) Carnival will facilitate a process of review to allow potential passengers who are dissatisfied with an initial assessment on a waiver application to further engage with Carnival on the matter
- b) Carnival will publish information about this process in its advertising and online booking system

will further reduce the discriminatory impact of the exemption as young people will be able to engage with Carnival, in good faith, which will promote a more transparent and flexible operation of Carnival's age restriction policy.

(c) The period of exemption

The Commission notes that Carnival has had an age restriction policy in place since the grant of the Initial Exemption in 2010.

As outlined above, Carnival has provided persuasive data showing that over the course of the Initial Exemption, 2013 Exemption and 2017 Exemption periods there has been a significant decrease in alcohol-fuelled and other security incidents on board Carnival cruises during the Schoolies Period. The Commission accepts that the Responsible Adult Requirement has had a significant impact on bringing about this result, and this may be particularly so in the early years of its operation.

The Commission notes that there is no current data to show whether the restrictions allowed by the exemptions continue to be the only factor, or the predominant factor, in the decrease of security incidents on board the cruises operating in the Schoolies Periods. There could feasibly be other factors contributing to the results provided by Carnival. The Commission understands that it is difficult, in practice, for Carnival to test whether factors outside of the Responsible Adult Requirement and quota restrictions have contributed to the decrease in alcohol-related security incidents.

Relative to previous exemptions granted, this exemption is granted subject to terms and conditions that require a narrower operation of Carnival's age restriction policy during the 1 November to 7 January period, with a view towards further minimising its discriminatory impact. This exemption is granted for a period of three years. The Commission requires Carnival, over the course of this exemption period, to consider whether there is an ongoing need for an

exemption from section 28 of the ADA, and whether there are other means of achieving its purpose at the conclusion of this exemption period.

(d) *Conclusion*

The Commission concludes that Carnival's policy is a reasonable measure which should be permitted for a period of three years, having weighed up the nature and extent of the discriminatory effect against the reasons in favour of the exemption.

8 Application for review

Subject to the *Administrative Appeals Tribunal Act 1975* (Cth), any person whose interests are affected by this decision may apply to the Administrative Appeals Tribunal for a review of the decision.

Dated this 17th day of October 2019.

A handwritten signature in black ink that reads "Rosalind Croucher". The signature is written in a cursive style with a large initial 'R'.

Signed by the President, Emeritus Professor Rosalind Croucher AM, on behalf of the Commission.

"First Application"

BAKER & MCKENZIE

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7 April 2009

STRICTLY PRIVATE AND CONFIDENTIAL

Elizabeth Broderick, Commissioner responsible for Age
Discrimination
Australian Human Rights Commission
Level 8
Piccadilly Tower
133 Castlereagh Street
SYDNEY

Dear Commissioner,

Application by Carnival Australia for Exemption under section 44(1) of the Age Discrimination Act 2004 (Cth)

We act for Carnival plc trading as Carnival Australia (*Carnival Australia*).

Our client seeks an exemption from the operation of the *Age Discrimination Act 2004* (Cth) (*the Act*) pursuant to section 44(1) of the Act.

In seeking an exemption, our client 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. Our client reserves all of its rights in this respect.

Background

Carnival Australia is Australia's leading cruise company and operator of 12 cruise brands (including P&O Cruises Australia).

Carnival Australia is committed to the safety and comfort of its passengers and acknowledges the changing community standards in respect of youth alcohol consumption. As an integral part of this commitment, Carnival Australia discontinued its promotion and operation of dedicated "Schoolies" cruises after 2006.

The reason for this decision was that our client experienced an exponential increase in the amount of alcohol-related security incidents during "Schoolies" cruises. Carnival Australia did undertake valid measures to reduce such incidents. Those measures included refusing alcohol service to persons involved in incidents, de-activating alcohol purchasing cards, and increasing the presence of onboard security. Despite these measures, Carnival Australia continued to experience a high level of Schoolies incidents which were fuelled by alcohol and threatened the security, comfort and health and safety of its passengers. These risks were compounded by Schoolies bringing contraband alcohol on board cruises, and the fact that cruises are contained environments that are

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isolated from emergency services during periods at sea. Consequently, our client made an informed decision to discontinue promoting and operating these voyages.

Even though Carnival discontinued marketing targeted towards school leavers for cruises during the relevant "Schoolies" period, there continued to be high levels of school-leavers seeking to book cruises during the traditional "Schoolies" periods and Carnival continued to experience alcohol-fuelled incidents.

Carnival Australia wishes to restrict the ability of persons aged under 21 years of age to take part in cruises without a parent or guardian during the traditional "Schoolies" period of 1 November to 30 January (*Schoolies Period*). Our client seeks an exemption, as set out in the remainder of this letter to ensure that it does not contravene relevant age discrimination legislation by imposing this restriction.

Attached to this letter is a policy document setting out in greater detail as to the basis for our client's desire to restrict cruises during Schoolies periods, and relevant social research and data. We also attach a letter in support of our client's application from the Alcohol and other Drugs of Australia Council dated 23 December 2008.

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 address the criteria referred to in the Guidelines below.

We note that the Guidelines suggest that applications for exemptions are to allow organisations time to make changes to comply with the Act. However, we find no such limitation on the Commission's general powers to grant exemptions under section 44 of the Act.

We note that in other jurisdictions similar exemptions have previously been granted for reasons other than to allow for compliance.

1. Is an exemption necessary?

As set out above, our client 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 putting in place a condition or requirement related directly to chronological age, may amount to unlawful discrimination under sections 14 and/or 15 and 28(b) of the Act.

The exemptions in sections 33, 34, 35, 36, 37, 38, 40, 41, 41A, 42, and 43 of the Act do not appear to apply to the conditions that our client proposes to impose on persons during the Schoolies Period.

The exemption contained in section 39 extends to acts done in compliance with certain applicable Commonwealth, State and Territory acts and regulations. One of the main reasons for our client's seeking to implement the restrictions we have outlined above is a concern for the health, safety and well-being of all passengers and staff on its vessels.

Because our client's vessels do not carry Australian flags, pursuant to maritime laws these vessels are not subject to Commonwealth, State and Territory acts and regulations with regards to occupational health and safety. However, our client is under similar obligations with respect to health and safety under laws in the jurisdictions of the flags that its ships carry.

2. *Is granting an exemption consistent with the objectives of the Act?*

The objects of the Act are set out in section 3 to the Act. These explicit objectives are directed towards eliminating discrimination, ensuring equality, allowing appropriate benefits, to promote community recognition, and to remove negative stereotypes.

Our client's application for an exemption is motivated principally by concerns for the health and safety of its passengers, and a concern that it does not promote or condone cultural rights of passage amongst young Australians which involve drinking to dangerous levels and substance abuse. However, our client's concerns are not inconsistent with the objectives of the Act for the following reasons:

- Our client is not seeking to remove the ability of "under 21s" to enjoy cruises during the Schoolies period. Rather, it wishes to ensure that persons are accompanied by responsible persons who are likely to monitor the behaviour of persons under 21 years of age and reduce the likelihood of the types of unacceptable behaviour associated with the rite of passage known as Schoolies Week.
- Our client is not relying upon negative stereotypes about persons of a similar age to school leavers in making this application. Rather it is relying upon its own experience of incidents during the Schoolies Period, and upon social research and statistical data. This is set out in the attached policy document.

Further, as noted above, our client is under certain statutory obligations in other jurisdictions regarding the health and safety of its passengers and employees. Section 39 of the Act exempts conduct in compliance with other legislation. To the extent that our client's proposed conduct does not fall within the exemption in section 39, the exemption sought is similar to the exemption contemplated in section 39.

3. *Is it appropriate to grant the exemption?*

Our client respectfully submits that it is appropriate, on public policy grounds, to grant the exemption sought. As set out above, our client seeks an exemption for the purpose of ensuring the security and safety of its passengers and also because it does not wish to provide a forum for a rite of passage that is endemically associated with alcohol and substance abuse.

Our client believes that its concern is consistent with current public sector initiatives regarding alcohol and substance abuse amongst young adults.

We also note that a number of other hospitality providers in popular Schoolies locations already impose conditions on school leavers during the Schoolies period such as increased room and property bonds, and parent or guardian supervision for under 21 year

olds. Some properties simply do not allow persons under the age of 21 to book hotel rooms during the Schoolies Period.

4. Opinions of interested parties

As set out above, we attach a letter from David Templeman of the Alcohol and other Drugs Council of Australia in which Mr Templeman supports Carnival's application.

We also note that our client's application is consistent with recent government spending to address dangerous drinking behaviours amongst young adults.

* * * * *

We thank you for considering our client's application. Our client would be happy to provide any further information that may assist its application upon the Commission's request.

Yours faithfully,
Baker & McKenzie



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"Second Application"

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* Associated Firm

21 June 2013

PRIVATE AND CONFIDENTIAL

Hon 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

"Last Application"

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28 October 2016

PRIVATE AND CONFIDENTIAL

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Dear [REDACTED]

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 applications to the Commission for exemptions under section 44(1) and section 44(2) of the Act.

We note as follows:

1. The first exemption sought by Carnival was granted by the Commission on 21 December 2010 (**Initial Exemption**). The Initial Exemption commenced on 23 December 2010 for a period of 2.5 years, expiring on 22 June 2013.
2. A subsequent exemption sought by Carnival was granted by the Commission on 15 November 2013 (**Last Exemption**). The Last Exemption also operated for a period of 2.5 years, expiring on 15 May 2016.

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 Last Exemption (**Further Exemption**). For convenience, the terms and conditions of the Last Exemption, (as detailed in the Commission's decision of 15 November 2013), are set out at **Schedule A**.

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.

1. Background

Reasons for Original Application for Initial Exemption and Subsequent Application for Last Exemption

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

- 1.2 Prior to obtaining the Initial Exemption in 2010, 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.
- 1.3 Carnival attempted to reduce the number and severity of these incidents by obtaining advice from security experts and implementing stringent security measures. These included:
 - (a) 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);
 - (b) tightening its policies and procedures in relation to the access and consumption of alcohol;
 - (c) enhancing the training and instruction of its crew in relation to the above procedures;
 - (d) increasing its pre-boarding and on-boarding searches for contraband alcohol; and
 - (e) increasing its security numbers and presence.
- 1.4 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.
- 1.5 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.
- 1.6 As a result of the above, Carnival sought the Initial Exemption from the Commission on 7 April 2009 in order to restrict the ability of persons under 21 years of age to take part in cruises without a parent or guardian during the Schoolies Period.
- 1.7 Following significant compromise from Carnival, the Commission granted the Initial Exemption on 21 December 2010 which permitted Carnival to

lawfully restrict the ability of persons 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 Initial 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. In seeking the Further Exemption, Carnival also relies on the reasons published by the Commission as part of its decision to grant the Last Exemption on 15 November 2013.

2. Reasons for Application for Further Exemption

- 2.1 Since the Commission granted the Initial Exemption and Last Exemption, Carnival has observed a significant and continued decrease in the number of alcohol-related security incidents during the Schoolies Period.
- 2.2 Carnival is of the view that such a decrease is attributable to the Initial Exemption granted by the Commission in 2010 and the Last Exemption granted by the Commission in 2013.
- 2.3 For example:
 - (a) On a cruise in December 2005, Carnival recorded 457 separate security incidents on one vessel, during one cruise.
 - (b) In December 2012, across all four Carnival vessels and across all cruises for that month, a total of 67 security incidents were recorded. Carnival 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.
 - (c) In December 2014, across six Australian home-ported Carnival vessels and across all cruises on those vessels for that month, a total of 18 security incidents were recorded.
 - (d) In December 2015, across six Australian home-ported Carnival vessels and across all cruises for that month, a total of 5 security incidents were recorded.
 - (e) During the period of the Last Exemption, Carnival continued to observe 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.
- 2.4 Carnival believes that the Initial Exemption and Last Exemption have served to:
 - (a) discourage Schoolies' participants from making bookings for the purpose of engaging in improper behaviour and under-age drinking;

- (b) reduce the likelihood of unmanageable large-scale Schoolies events organised through, for example, social networking; and
 - (c) promote an understanding that Carnival cruises will not tolerate improper behaviour and under-age drinking on its cruise-ships as part of Schoolies celebrations.
- 2.5 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.
- 2.6 Carnival wishes to continue to prioritise the health, safety and security of its passengers generally, and in particular during the Schoolies Period.
- 2.7 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.
- 2.8 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 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; and
 - (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.

- 2.9 Carnival notes that the Commission, in publishing its:
- (a) Notice to Grant a Temporary Exemption to Carnival on 21 December 2010 (which we **enclose** for your convenience) (**2010 Notice**); and
 - (b) Notice to Grant a Temporary Exemption to Carnival on 15 November 2013 (which we **enclose** for your convenience) (**2013 Notice**),
- has provided reasons as to why it was appropriate to grant Carnival the Initial Exemption and the Last Exemption.

- 2.10 Carnival seeks to rely on these reasons in this application for a Further Exemption. The foundations for the Initial Exemption and the Last Exemption have not changed.

3. Key Criteria for Assessment of Application

2010 Temporary exemptions under the Age Discrimination Act Commission Guidelines ("Guidelines")

- 3.1 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.
- 3.2 Carnival has previously addressed a number of these criteria in its:
- (a) application for the Initial Exemption dated 7 April 2009 (**First Application**); and
 - (b) application for the Last Exemption dated 21 June 2013 (**Second Application**).

Carnival relies on the submissions and evidence which it made in relation to the First Application and the Second Application. A copy of the First Application and Second Application are **enclosed** for your convenience.

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

- 3.3 In effect, Carnival seeks an extension of the Last Exemption on the same terms and conditions (see **Schedule A**). Carnival believes that the Last Exemption strikes an appropriate and reasonable balance between genuine health and safety concerns, and the rights of persons aged under 19 years of age.
- 3.4 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.

- 3.5 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.
- 3.6 Carnival wishes to have the following matters covered in the exemption.
- (a) Carnival has implemented passage terms and conditions which seek 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.
 - (b) Carnival wishes to impose the following restrictions based on age on its cruises commencing in Australia:
 - (i) 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**).
 - (A) Carnival may, at its sole discretion, waive the Responsible Adult Requirement where it is satisfied (in its sole and absolute discretion) that there is no risk that a specific passenger under the age of 19 will participate in an Unauthorised Event. Carnival may require any such passenger to sign a code of conduct or provide other commitments as a condition of boarding.
 - (B) Where the Responsible Adult Requirement is mentioned in Carnival's advertising or online booking system, Carnival will also state that it has retained a discretion to waive the Responsible Adult Requirement.
 - (C) This discretion may be exercised by Carnival on a case by case basis and Carnival is not required to make an assessment of each and every case, nor is Carnival required to engage in a review process of any decision in relation to its exercise of the discretion.
 - (ii) 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. Once this quota is filled, Carnival will apply its Responsible Adult Requirement.

- (iii) This quota will not include infants and will also not include passengers under the age of 17, where Carnival believes there is no risk that the minor will participate in an Unauthorised Event. Carnival will otherwise determine how the quota is filled.
- (iv) Carnival may, in its sole and absolute discretion, increase this quota where it decides that the increase will not result in a risk to health, safety and security of the passengers and crew, having regard to the purpose of its policy.
- (v) Carnival will retain an absolute discretion to accept or reject any application/request for waiver of the Responsible Adult Requirement (where the quota is filled and it becomes applicable). It will not be required to engage in a review process of any decision in relation to its exercise of the discretion.

3.7 In respect of Clause 3.6(b)(i)(B), we provide the relevant extract from Carnival's online booking system below:

"Subject to applicable laws, for cruises departing from an Australian port between 1 November and 7 January, any guest under 19 years of age on the day they board the cruise, must travel in the same room as a responsible adult 19 years or older. In addition, from 8 January to 31 January, there is a limit on the number of guests under 19 years of age who can travel unaccompanied. Once the limit is reached, a responsible adult 19 years or older must travel in the same room. We can advise you at the time of booking whether the limit applies to your booking. P&O Cruises can waive the responsible adult requirement at our discretion. The responsible adult is accountable for guests under 19 years of age in their room for the duration of the cruise, and the 'Rights of the Captain' under clause 28 will be applied to anyone who displays disruptive behaviour."

Who will be affected by the application?

3.8 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 instance:

- (a) For the first period of approximately two months, this age group can still travel with Carnival provided that they are accompanied by an adult. Notably, Carnival may also waive this requirement in certain circumstances as set out in Clause 3.6(b)(i)(A) above.

- (b) In the second period of approximately one month, an adult may not be required where Carnival has not filled its quota of 60 persons. Notably, Carnival may also increase this quota in certain circumstances as set out in Clause 3.6(b)(iv) above.

Is an exemption necessary?

- 3.9 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, Carnival's conduct may amount to unlawful discrimination under section 14 and/or 15 and 28(b) of the Act.
- 3.10 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.
- 3.11 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.
- 3.12 As stated earlier in this Application, the principal reason why Carnival is seeking an extension of the Last Exemption is an ongoing concern for the health, safety and well-being of all passengers and staff on its vessels.
- 3.13 Carnival is of the view that the 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.

Why should an exemption be granted?

- 3.14 We have addressed these reasons earlier in this Application.
- 3.15 We repeat that Carnival's Application for 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.
- 3.16 Carnival notes that since the Commission granted the Initial Exemption to Carnival in 2010, it observed a general decrease in the number of Unauthorised Events and reported incidents involving anti-social behaviour during Schoolies Periods. Carnival further notes that since the Commission

granted the Last Exemption to Carnival in 2013, the incidence of Unauthorised Events and reported incidents involving anti-social behaviour during Schoolies Periods has continued along this downward trend.

- 3.17 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 the Initial Exemption in 2010 and the Last Exemption in 2013. 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.
- 3.18 Carnival notes that, in seeking a Further Exemption and in continuing to lawfully undertake the activities described in Clause 3.6 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.
- 3.19 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.
- 3.20 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.
- 3.21 Further, Carnival refers to the 2010 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 2010 Notice:
- (a) 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.
 - (b) 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.

- (c) 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.
- (d) 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.

3.22 The above reasons put forward by the Commission in the 2010 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.

3.23 Further, Carnival refers to the 2013 Notice in which the Commission provided its reasons for granting Carnival's Last Exemption. Carnival notes that the Commission has stated the following in the 2013 Notice:

- (a) Carnival's policy pursues a legitimate public policy goal and is appropriately targeted in its approach;
- (b) the parameters set by Carnival in relation to the Responsible Adult Requirement make it an appropriately targeted approach in terms of age, limited periods of application and flexibility; and
- (c) Carnival's policy is a reasonable measure having regard to the objects of the Act, and having weighed up the nature and extent of the discriminatory effect against the reasons in favour of the Exemption.

3.24 Finally, Carnival refers the Commission to the June 2013 Report commissioned by the House of Representatives Standing Committee on Social Policy and Legal Affairs titled "*Troubled Waters - Inquiry into the arrangements surrounding crimes committed at seas*". Whilst the full report can be viewed via the link [http://www.aph.gov.au/parliamentary_Business/Committees/House of Representatives Committees?url=spla/crimes%20at%20sea/report/fullreport.pdf](http://www.aph.gov.au/parliamentary_Business/Committees/House_of_Representatives_Committees?url=spla/crimes%20at%20sea/report/fullreport.pdf), Carnival specifically draws the Commission's attention to the following clauses 4.75 and 4.76 where the Committee expressly indicates its support of Carnival's existing Exemption for the Schoolies Period:

"4.75 Carnival Australia's decision to ban schoolies cruises is a responsible one. However, there is a possibility that other operators will seek to take advantage of the 'schoolies' market and run such cruises in future. The Committee believes that operating 'schoolies cruises' is irresponsible, and expects that operators, informed by the tragedies of recent years, will refrain from doing so.

4.76 The Committee notes that Carnival Australia will soon have to reapply for an exemption for its schoolies-cruise ban. The Human Rights Commission must consider such an exemption on its merits, and the Committee is fully supportive of Carnival's decision to ban schoolies cruises."

Are there factors that may affect the processing of the Application?

3.25 In previous correspondence from the Commission dated 21 December 2010 and in the Conditions contained on page 6 of the 2013 Notice under the heading "Terms of the Exemption", the Commission foreshadowed that Carnival should provide certain additional information in an application for a Further Exemption. Such additional information is provided as follows:

- (a) **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 tables at **Schedule B** in respect of Australian home-ported Carnival cruise ships.

- (b) **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 tables at **Schedule B** in respect of Australian home-ported Carnival cruise ships.

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

- (d) Please refer to the tables at

Schedule C and Schedule D.

- (e) **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 continued decrease in the nature and seriousness of security incidents within the relevant period since the Initial Exemption and Last Exemption were 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. In December 2015, across six Australian home-ported Carnival vessels and all cruises for that month, a total of 5 security incidents were recorded in relation to passengers of aged 16, 17, 18 and 19.

- (f) **During the period of the Last Exemption, how many applications/requests for waiver of the Responsible Adult Requirement did Carnival approve for the 1 November - 7 January period?**

Having made enquiries, Carnival is aware of four instances in which it waived the Responsible Adult Requirement during the 1 November - 7 January period. These instances related to bookings made by passengers all under the age of 19 who indicated that they did not intend to participate in Schoolies celebrations or any other unauthorised events.

- (g) **During the period of the Last Exemption:**

- (i) **how many applications/requests did Carnival receive for waiver of the Responsible Adult Requirement during the 8 January - 31 January period, once the quota was filled; and**
- (ii) **on how many occasions and to what number did Carnival increase the quota?**

To the best of Carnival's knowledge, it has not been necessary to consider increasing the quota as Carnival has not had more than 60

unaccompanied passengers aged under 19 years make bookings during the relevant period.

* * * * *

We thank you for considering Carnival's application for the 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

Terms and Conditions of the Last Exemption (as set out in the decision of the Commission dated 15 November 2013)

Terms of the Exemption

Carnival may impose the following restrictions, based on age, in relation to its cruises commencing in Australia:

1. For Carnival cruise-ships departing an Australian port between 1 November and 7 January annually, passengers who are under the age of 19 must be accompanied by a responsible adult (Responsible Adult Requirement).

Carnival may, at its sole discretion, waive the Responsible Adult Requirement where it is satisfied (in its sole and absolute discretion) that there is no risk that a specific passenger under the age of 19 will participate in an Unauthorised Event. Carnival may require any such passenger to sign a code of conduct or provide other commitments as a condition of boarding.

Where the Responsible Adult Requirement is mentioned in Carnival's advertising or online booking system, Carnival will also state that it has retained a discretion to waive the Responsible Adult Requirement.

This discretion may be exercised by Carnival on a case by case basis and Carnival is not required to make an assessment of each and every case, nor is Carnival required to engage in a review process of any decision in relation to its exercise of the discretion.

2. 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 under the age of 19 and not accompanied by a responsible adult. Once this quota is filled, Carnival will apply its Responsible Adult Requirement.

The quota will not include infants and will also not include passengers under the age of 17, where Carnival believes there is no risk that the minor will participate in an Unauthorised Event. Carnival will otherwise determine how the quota is filled.

Carnival may, in its sole and absolute discretion, increase this quota where it decides that the increase will not result in a risk to health, safety and security of the passengers and crew, having regard to the purpose of its policy.

Carnival will retain an absolute discretion to accept or reject any application/request for waiver of the Responsible Adult Requirement (where the quota is filled and it becomes applicable). It will not be required to engage in a review process of any decision in relation to its exercise of the discretion.

Conditions

This exemption is subject to the following conditions:

- (a) Carnival will report to the Commission at the end of this exemption period, how many applications/requests for waiver of the Responsible Adult Requirement it receives for the 1 November – 7 January period and how many of these applications/requests it approves.*
- (b) Carnival will report to the Commission at the end of this exemption period*
 - (i) how many applications/requests it receives for waiver of the Responsible Adult Requirement during the 8 January – 31 January period, once the quota is filled; and*
 - (ii) on how many occasions and to what number it increases the quota.*

Schedule B

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

- Australian home-ported Carnival cruise ships departed from an Australian port, their date of departure and identifying vessel number; and
- passengers aged 16 - 18 years who 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.

Key

CL	Carnival Cruise Lines
PA	P&O Cruises Australia
PC	Princess Cruises

2013/2014 Cruises during Schoolies Period

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
CL	2013	S332	6/11/2013 0:00	30	11	16	57
		S333	16/11/2013 0:00	22	61	33	116
		S334	24/11/2013 0:00	37	54	75	166
		S335	5/12/2013 0:00	47	63	78	188
		S336	13/12/2013 0:00	80	71	78	229
		S337	21/12/2013 0:00	69	63	62	194
		S401	30/12/2013 0:00	78	49	80	207
PA	2013	J338	2/11/2013 0:00	3	0	9	12
		J339	8/11/2013 0:00	6	10	3	19
		J340	11/11/2013 0:00	10	10	22	42
		J341	25/11/2013	21	18	99	138

Cruise Information			Age of Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
			0:00				
		J342	5/12/2013 0:00	28	26	40	94
		J343	9/12/2013 0:00	33	51	76	160
		J344	18/12/2013 0:00	31	29	48	108
		J401	28/12/2013 0:00	32	32	35	99
		P337	2/11/2013 0:00	1	1	3	5
		P338	8/11/2013 0:00	10	11	30	51
		P339	18/11/2013 0:00	18	41	54	113
		P340	27/11/2013 0:00	9	16	31	56
		P341	10/12/2013 0:00	37	44	68	149
		P342	19/12/2013 0:00	37	32	25	94
		P401	29/12/2013 0:00	30	39	49	118
		W302	5/01/2013 0:00	28	29	40	97
		W344	9/11/2013 0:00	15	9	24	48
		W345	16/11/2013 0:00	12	21	13	46
		W346	26/11/2013 0:00	14	32	24	70
		W347	30/11/2013 0:00	30	58	56	144
		W348	7/12/2013 0:00	31	67	80	178
		W349	14/12/2013 0:00	33	32	47	112
		W350	21/12/2013 0:00	22	37	29	88
		W401	30/12/2013 0:00	39	37	42	118
PC	2013	1333	3/11/2013 0:00	0	0	1	1

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		1334	10/11/2013 0:00	0	0	0	0
		1335	17/11/2013 0:00	0	0	0	0
		1337	1/12/2013 0:00	0	0	0	0
		1338	8/12/2013 0:00	0	0	0	0
		1339	15/12/2013 0:00	1	0	0	1
		1340	22/12/2013 0:00	0	0	0	0
		1401	29/12/2013 0:00	1	0	0	1
		2336	14/11/2013 0:00	0	0	0	0
		2337	29/11/2013 0:00	0	0	0	0
		2338	10/12/2013 0:00	0	0	0	0
		2401	21/12/2013 0:00	0	0	0	0
		3302	5/01/2013 0:00	0	0	0	0
		3333	9/11/2013 0:00	0	0	0	0
		3335	23/11/2013 0:00	0	0	0	0
		3336	30/11/2013 0:00	0	0	0	0
		3338	14/12/2013 0:00	0	0	0	0
		3339	21/12/2013 0:00	0	0	0	0
		5302	2/01/2013 0:00	1	0	0	1
		5345	4/11/2013 0:00	0	0	0	0
		5346	7/11/2013 0:00	0	0	0	0
		5347	11/11/2013 0:00	0	0	0	0
		5348	15/11/2013 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		5349	18/11/2013 0:00	0	0	0	0
		5351	24/11/2013 0:00	0	0	0	0
		5352	27/11/2013 0:00	0	0	0	0
		5353	1/12/2013 0:00	0	0	1	1
		5354	4/12/2013 0:00	1	0	0	1
		5401	21/12/2013 0:00	2	1	1	4
		6336	4/11/2013 0:00	0	0	0	0
		6337	15/11/2013 0:00	0	0	0	0
		6340	18/12/2013 0:00	0	0	0	0
		6401	28/12/2013 0:00	0	0	0	0
		7325	4/11/2013 0:00	0	0	0	0
		7326	19/11/2013 0:00	0	0	0	0
		7327	29/11/2013 0:00	0	0	0	0
		7328	9/12/2013 0:00	0	0	1	1
		7329	19/12/2013 0:00	1	2	1	4
		7401	29/12/2013 0:00	3	1	1	5
		9302	4/01/2013 0:00	1	1	1	3
		9336	5/11/2013 0:00	0	0	0	0
		9337	20/11/2013 0:00	0	0	0	0
		9338	5/12/2013 0:00	1	0	0	1
		9401	20/12/2013 0:00	0	1	1	2
		3334A	16/11/2013 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		3335A	23/11/2013 0:00	0	0	0	0
		3337A	7/12/2013 0:00	0	0	0	0
		3338A	14/12/2013 0:00	0	0	0	0
		3401A	28/12/2013 0:00	0	0	0	0
		5354A	4/12/2013 0:00	1	1	1	3
		7325A	4/11/2013 0:00	0	0	0	0
		A302	5/01/2013 0:00	0	0	0	0
		A302A	5/01/2013 0:00	0	0	0	0
		A330	10/11/2013 0:00	0	0	0	0
		A331	25/11/2013 0:00	0	0	0	0
		A401	20/12/2013 0:00	0	0	0	0
		B337	9/11/2013 0:00	0	0	0	0
		B340	30/11/2013 0:00	1	0	1	2
		B343	21/12/2013 0:00	0	0	0	0
		C314	8/11/2013 0:00	1	0	1	2
		C315	22/11/2013 0:00	3	14	11	28
		C316	3/12/2013 0:00	18	14	17	49
		C317	17/12/2013 0:00	26	24	17	67
		C401	28/12/2013 0:00	41	37	33	111
		D318	15/11/2013 0:00	4	4	4	12
		D319	19/11/2013 0:00	2	1	0	3
		D320	2/12/2013 0:00	11	9	12	32

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		D321	15/12/2013 0:00	16	21	11	48
		D401	21/12/2013 0:00	11	16	12	39
		E302	6/01/2013 0:00	1	0	0	1
		E302A	6/01/2013 0:00	0	0	0	0
		E330	9/11/2013 0:00	0	0	0	0
		E330A	9/11/2013 0:00	0	0	0	0
		E331	19/11/2013 0:00	0	0	0	0
		E331A	19/11/2013 0:00	0	0	0	0
		E332	29/11/2013 0:00	1	0	1	2
		E332A	29/11/2013 0:00	0	0	0	0
		E333	9/12/2013 0:00	0	1	0	1
		E333A	9/12/2013 0:00	0	0	0	0
		E334	19/12/2013 0:00	0	0	0	0
		E334A	19/12/2013 0:00	0	0	0	0
		E401	29/12/2013 0:00	0	0	0	0
		E401A	29/12/2013 0:00	0	0	0	0
		H339	16/11/2013 0:00	0	0	2	2
		H340	23/11/2013 0:00	0	1	2	3
		H341	30/11/2013 0:00	0	1	0	1
		H342	15/12/2013 0:00	2	1	0	3
		H343	22/12/2013 0:00	0	0	0	0
		H401	29/12/2013 0:00	0	1	1	2

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		H401N	29/12/2013 0:00	0	0	0	0
		K302	3/01/2013 0:00	0	0	0	0
		K320	11/11/2013 0:00	0	0	0	0
		K320A	11/11/2013 0:00	0	0	0	0
		K321	23/11/2013 0:00	0	0	0	0
		K321A	23/11/2013 0:00	0	0	0	0
		K322	5/12/2013 0:00	0	0	0	0
		K401	23/12/2013 0:00	0	1	0	1
		M330P	4/11/2013 0:00	1	0	0	1
		M331	14/11/2013 0:00	1	1	2	4
		M332	3/12/2013 0:00	5	7	7	19
		M333	11/12/2013 0:00	26	16	8	50
		M401	23/12/2013 0:00	20	25	13	58
		R302	6/01/2013 0:00	0	1	0	1
		R335	5/11/2013 0:00	0	0	0	0
		R335A	5/11/2013 0:00	0	0	0	0
		R335C	11/11/2013 0:00	0	0	0	0
		R336	17/11/2013 0:00	0	1	0	1
		R336A	17/11/2013 0:00	0	0	0	0
		R337	29/11/2013 0:00	0	0	0	0
		S331	11/11/2013 0:00	5	5	2	12
		S331A	11/11/2013 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		S332	21/11/2013 0:00	4	8	4	16
		S332A	25/11/2013 0:00	0	0	0	0
		S333	4/12/2013 0:00	2	16	16	34
		S333A	8/12/2013 0:00	1	0	0	1
		S334	17/12/2013 0:00	13	19	11	43
		S334A	21/12/2013 0:00	2	2	1	5
		S401	30/12/2013 0:00	23	23	33	79

2014/2015 Cruises during Schoolies Period

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
CL	2014	G436	6/11/2014 0:00	16	22	27	65
		G437	14/11/2014 0:00	27	24	34	85
		G438	26/11/2014 0:00	30	76	79	185
		G439	6/12/2014 0:00	78	67	84	229
		G440	16/12/2014 0:00	63	63	52	178
		G501	27/12/2014 0:00	60	55	35	150
		S436N	2/11/2014 0:00	1	4	6	11
		S437N	9/11/2014 0:00	30	16	26	72
		S438	20/11/2014 0:00	34	55	60	149
		S439	2/12/2014 0:00	55	63	91	209
		S440	10/12/2014 0:00	69	63	66	198
		S441	18/12/2014	56	65	38	159

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
			0:00				
		S501	30/12/2014 0:00	60	43	45	148
PA	2014	J444	1/11/2014 0:00	0	0	8	8
		J445	7/11/2014 0:00	5	4	10	19
		J446	10/11/2014 0:00	10	12	35	57
		J447	20/11/2014 0:00	12	20	44	76
		J448	24/11/2014 0:00	21	13	48	82
		J449	28/11/2014 0:00	18	15	29	62
		J450	1/12/2014 0:00	33	37	80	150
		J451	11/12/2014 0:00	24	18	21	63
		J452	14/12/2014 0:00	30	39	60	129
		J453	18/12/2014 0:00	41	39	29	109
		J501	28/12/2014 0:00	32	22	35	89
		P444	1/11/2014 0:00	1	1	2	4
		P445	7/11/2014 0:00	7	10	22	39
		P446	21/11/2014 0:00	15	14	21	50
		P447	4/12/2014 0:00	26	22	53	101
		P448	8/12/2014 0:00	27	54	64	145
		P449	17/12/2014 0:00	37	31	33	101
		P450	27/12/2014 0:00	35	27	42	104
		P501	30/12/2014 0:00	32	48	31	111
		W442	1/11/2014 0:00	21	8	14	43

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		W443	5/11/2014 0:00	4	7	10	21
		W444	15/11/2014 0:00	20	11	28	59
		W445N	22/11/2014 0:00	21	27	29	77
		W446	6/12/2014 0:00	34	57	57	148
		W447	13/12/2014 0:00	36	31	59	126
		W448	20/12/2014 0:00	33	21	40	94
		W501	29/12/2014 0:00	37	26	42	105
PC	2014	1402	5/01/2014 0:00	3	2	0	5
		1436	4/11/2014 0:00	0	0	0	0
		1437	14/11/2014 0:00	0	0	0	0
		1438	24/11/2014 0:00	0	0	0	0
		1439	4/12/2014 0:00	0	0	0	0
		1440	9/12/2014 0:00	0	1	0	1
		1441	19/12/2014 0:00	0	0	0	0
		1501	29/12/2014 0:00	2	3	0	5
		2402	5/01/2014 0:00	4	1	1	6
		2433	26/11/2014 0:00	0	0	0	0
		2434	7/12/2014 0:00	0	0	0	0
		2435	18/12/2014 0:00	0	0	0	0
		2501	29/12/2014 0:00	1	0	0	1
		3402	4/01/2014 0:00	0	0	0	0
		3440	15/11/2014 0:00	0	1	0	1

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		3441	22/11/2014 0:00	0	0	0	0
		3442	29/11/2014 0:00	0	1	0	1
		3443	6/12/2014 0:00	2	0	0	2
		3444	13/12/2014 0:00	1	1	0	2
		3445	20/12/2014 0:00	0	0	1	1
		3501	27/12/2014 0:00	1	0	0	1
		5402	4/01/2014 0:00	0	1	0	1
		5442	3/11/2014 0:00	0	0	0	0
		5444	10/11/2014 0:00	0	0	1	1
		5446	17/11/2014 0:00	0	0	0	0
		5448	23/11/2014 0:00	0	0	0	0
		5449	26/11/2014 0:00	1	0	0	1
		5450	30/11/2014 0:00	0	0	0	0
		5451	3/12/2014 0:00	0	0	0	0
		5501	19/12/2014 0:00	1	0	0	1
		6437	9/11/2014 0:00	0	0	0	0
		6438	20/11/2014 0:00	0	0	0	0
		6440	12/12/2014 0:00	0	0	0	0
		6501	23/12/2014 0:00	3	1	2	6
		7426	2/11/2014 0:00	0	0	0	0
		7427	9/11/2014 0:00	0	0	0	0
		7428	20/11/2014 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		7429	1/12/2014 0:00	0	0	0	0
		7501	19/12/2014 0:00	0	0	0	0
		9402	4/01/2014 0:00	1	1	0	2
		9429	14/11/2014 0:00	0	0	0	0
		9430	24/11/2014 0:00	0	0	0	0
		9501	19/12/2014 0:00	0	1	0	1
		1436A	4/11/2014 0:00	0	0	0	0
		1437A	14/11/2014 0:00	0	0	0	0
		1440A	9/12/2014 0:00	0	0	0	0
		1441A	19/12/2014 0:00	0	0	0	0
		2432R	11/11/2014 0:00	0	0	0	0
		3402A	4/01/2014 0:00	0	0	0	0
		5451A	3/12/2014 0:00	0	1	0	1
		7426A	2/11/2014 0:00	0	0	0	0
		7428A	20/11/2014 0:00	0	0	0	0
		9428N	4/11/2014 0:00	0	0	0	0
		A402	4/01/2014 0:00	0	0	0	0
		A437N	9/11/2014 0:00	0	0	0	0
		A438	19/11/2014 0:00	0	0	1	1
		A439	4/12/2014 0:00	0	0	0	0
		A501	19/12/2014 0:00	0	0	0	0
		B402	4/01/2014 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		B451	1/11/2014 0:00	0	0	0	0
		B463	27/12/2014 0:00	0	0	0	0
		C427	10/11/2014 0:00	2	1	3	6
		C428	24/11/2014 0:00	0	4	4	8
		C429	5/12/2014 0:00	34	31	28	93
		C430	19/12/2014 0:00	24	27	19	70
		C501	30/12/2014 0:00	26	29	14	69
		D402	4/01/2014 0:00	17	21	12	50
		D421	2/11/2014 0:00	1	2	0	3
		D421A	6/11/2014 0:00	0	0	0	0
		D422	15/11/2014 0:00	0	0	0	0
		D422A	19/11/2014 0:00	1	1	0	2
		D423	28/11/2014 0:00	7	9	17	33
		D423A	2/12/2014 0:00	1	0	0	1
		D424	11/12/2014 0:00	14	9	12	35
		D425	16/12/2014 0:00	16	17	23	56
		D425A	20/12/2014 0:00	1	1	1	3
		D501	29/12/2014 0:00	13	13	13	39
		E429	16/11/2014 0:00	0	0	0	0
		E431	30/11/2014 0:00	0	0	0	0
		E432	7/12/2014 0:00	0	0	0	0
		G435	6/11/2014 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		G436	9/11/2014 0:00	0	0	0	0
		G441	14/12/2014 0:00	1	0	0	1
		H401P	5/01/2014 0:00	1	0	0	1
		H449	10/11/2014 0:00	2	3	0	5
		H449B	19/11/2014 0:00	0	0	0	0
		H450	27/11/2014 0:00	3	0	6	9
		H450A	27/11/2014 0:00	0	0	0	0
		H451	8/12/2014 0:00	3	4	2	9
		H451A	8/12/2014 0:00	0	1	0	1
		H452	18/12/2014 0:00	17	14	9	40
		H452A	18/12/2014 0:00	3	4	4	11
		H501	29/12/2014 0:00	3	10	4	17
		H501A	29/12/2014 0:00	6	8	7	21
		K402	6/01/2014 0:00	0	0	0	0
		K434	8/11/2014 0:00	0	0	0	0
		K435	18/11/2014 0:00	0	0	0	0
		K436	28/11/2014 0:00	0	0	0	0
		K437	8/12/2014 0:00	0	0	0	0
		K438	18/12/2014 0:00	1	1	1	3
		K501	28/12/2014 0:00	0	2	1	3
		M402	4/01/2014 0:00	41	35	27	103
		M432N	16/11/2014 0:00	4	5	6	15

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		M433N	14/12/2014 0:00	25	25	19	69
		M501N	19/12/2014 0:00	32	23	21	76
		R442	3/11/2014 0:00	0	0	0	0
		R443	8/11/2014 0:00	0	0	0	0
		R444	15/11/2014 0:00	0	0	0	0
		R444A	15/11/2014 0:00	0	0	0	0
		R445	22/11/2014 0:00	0	0	0	0
		R445A	22/11/2014 0:00	0	0	0	0
		R446	29/11/2014 0:00	0	0	0	0
		R447	6/12/2014 0:00	0	0	0	0
		R447A	6/12/2014 0:00	0	0	1	1
		R448	13/12/2014 0:00	0	0	0	0
		R448A	13/12/2014 0:00	0	1	0	1
		R449	20/12/2014 0:00	1	0	0	1
		R449A	20/12/2014 0:00	0	0	0	0
		R501	27/12/2014 0:00	0	0	0	0
		R501A	27/12/2014 0:00	1	1	0	2
		S434	12/11/2014 0:00	3	1	2	6
		S435	25/11/2014 0:00	5	14	10	29
		S436	9/12/2014 0:00	5	10	11	26
		S437	16/12/2014 0:00	39	18	25	82
		S501	29/12/2014 0:00	23	18	13	54

2015/2016 Cruises during Schoolies Period

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
CL	2015	G502	5/01/2015 0:00	72	74	65	211
		G536	4/11/2015 0:00	16	15	16	47
		G537	12/11/2015 0:00	21	19	24	64
		G538	21/11/2015 0:00	35	56	66	157
		G539	1/12/2015 0:00	53	78	93	224
		G540	12/12/2015 0:00	67	70	63	200
		G541	20/12/2015 0:00	53	45	28	126
		G601	30/12/2015 0:00	58	48	44	148
		S502	7/01/2015 0:00	84	58	57	199
		S534	7/11/2015 0:00	15	16	28	59
		S535	17/11/2015 0:00	27	31	47	105
		S536	27/11/2015 0:00	30	29	41	100
		S537	30/11/2015 0:00	43	64	88	195
		S538	9/12/2015 0:00	80	85	85	250
		S539	19/12/2015 0:00	56	55	38	149
		S601	27/12/2015 0:00	56	42	53	151
PA	2015	A546	24/11/2015 0:00	0	0	1	1
		A547	25/11/2015 0:00	8	9	13	30
		A548	27/11/2015 0:00	15	12	12	39
		A549	30/11/2015 0:00	20	34	18	72

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		A550	7/12/2015 0:00	18	19	36	73
		A551	17/12/2015 0:00	19	17	9	45
		A601	27/12/2015 0:00	21	12	17	50
		E546	14/11/2015 0:00	0	0	5	5
		E547	15/11/2015 0:00	2	1	2	5
		E548	25/11/2015 0:00	5	16	33	54
		E549	4/12/2015 0:00	14	20	27	61
		E550	7/12/2015 0:00	26	38	46	110
		E551	16/12/2015 0:00	15	27	21	63
		E601	28/12/2015 0:00	25	28	26	79
		J543	6/11/2015 0:00	3	9	16	28
		J544	9/11/2015 0:00	11	18	17	46
		J545	20/11/2015 0:00	9	17	14	40
		J546	23/11/2015 0:00	10	14	14	38
		J547	27/11/2015 0:00	9	8	33	50
		J548P	30/11/2015 0:00	20	31	64	115
		J548Q	8/12/2015 0:00	22	29	31	82
		J548R	10/12/2015 0:00	15	18	29	62
		J549P	13/12/2015 0:00	39	34	29	102
		J550N	17/12/2015 0:00	40	39	30	109
		J601N	29/12/2015 0:00	21	9	17	47
		P540	6/11/2015 0:00	11	14	24	49

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		P541	10/11/2015 0:00	7	11	36	54
		P542N	19/11/2015 0:00	9	12	16	37
		P543N	23/11/2015 0:00	9	14	13	36
		P544N	26/11/2015 0:00	15	14	23	52
		P545P	9/12/2015 0:00	22	27	40	89
		P545Q	13/12/2015 0:00	42	35	41	118
		P546	17/12/2015 0:00	45	35	26	106
		P601	27/12/2015 0:00	39	35	40	114
		W544	7/11/2015 0:00	8	5	12	25
		W545	17/11/2015 0:00	17	9	25	51
		W546N	21/11/2015 0:00	13	47	31	91
		W546Q	28/11/2015 0:00	43	95	78	216
		W547	5/12/2015 0:00	40	69	64	173
		W548	12/12/2015 0:00	21	61	37	119
		W549	19/12/2015 0:00	36	33	28	97
		W601	28/12/2015 0:00	46	41	46	133
PC	2015	1530	10/11/2015 0:00	0	0	0	0
		1531	20/11/2015 0:00	0	0	0	0
		1532	30/11/2015 0:00	0	0	0	0
		1533	10/12/2015 0:00	1	0	1	2
		1534	20/12/2015 0:00	1	2	1	4
		1601	30/12/2015 0:00	0	2	0	2

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		2523	6/11/2015 0:00	0	0	0	0
		2524	25/11/2015 0:00	0	0	0	0
		2525	5/12/2015 0:00	0	0	0	0
		2601	20/12/2015 0:00	2	1	1	4
		3502	3/01/2015 0:00	0	0	0	0
		3503	6/01/2015 0:00	0	0	0	0
		3550	14/11/2015 0:00	0	0	0	0
		3551	21/11/2015 0:00	0	0	0	0
		3552	28/11/2015 0:00	0	3	0	3
		3553	5/12/2015 0:00	0	0	0	0
		3554	12/12/2015 0:00	1	0	1	2
		3555	19/12/2015 0:00	0	0	0	0
		3601	27/12/2015 0:00	2	1	0	3
		5502	3/01/2015 0:00	0	1	0	1
		5534	12/11/2015 0:00	0	2	1	3
		5535	25/11/2015 0:00	4	13	4	21
		5536	8/12/2015 0:00	23	15	18	56
		5601	21/12/2015 0:00	21	26	19	66
		6502	3/01/2015 0:00	0	0	0	0
		6538	7/11/2015 0:00	0	0	0	0
		6539	22/11/2015 0:00	0	2	0	2
		6540	7/12/2015 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		6541	17/12/2015 0:00	0	0	0	0
		6601	27/12/2015 0:00	0	0	0	0
		7502	2/01/2015 0:00	0	0	0	0
		7521	2/12/2015 0:00	0	0	0	0
		7601	20/12/2015 0:00	0	0	0	0
		9502	3/01/2015 0:00	0	0	0	0
		9536	8/11/2015 0:00	0	0	0	0
		9538	16/11/2015 0:00	0	0	0	0
		9539	20/11/2015 0:00	0	0	0	0
		9540	25/11/2015 0:00	0	0	0	0
		9541	29/11/2015 0:00	2	0	1	3
		9542	4/12/2015 0:00	0	0	0	0
		9601	21/12/2015 0:00	2	0	0	2
		1531A	20/11/2015 0:00	0	0	0	0
		1533A	10/12/2015 0:00	0	0	0	0
		1601A	30/12/2015 0:00	0	0	0	0
		5534A	12/11/2015 0:00	1	0	0	1
		5534B	16/11/2015 0:00	0	0	0	0
		5535A	29/11/2015 0:00	1	0	1	2
		5536A	12/12/2015 0:00	0	1	1	2
		9542A	4/12/2015 0:00	0	0	0	0
		9601C	31/12/2015 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		A502N	3/01/2015 0:00	0	0	0	0
		A537	8/11/2015 0:00	0	0	0	0
		A538	15/11/2015 0:00	0	0	0	0
		A539	25/11/2015 0:00	0	1	0	1
		A541	20/12/2015 0:00	0	0	0	0
		A601	30/12/2015 0:00	0	0	0	0
		B502	3/01/2015 0:00	0	0	0	0
		B541	4/11/2015 0:00	0	0	0	0
		B542	8/11/2015 0:00	0	0	0	0
		B543	15/11/2015 0:00	0	0	0	0
		B545	29/11/2015 0:00	0	0	0	0
		B548	20/12/2015 0:00	0	0	0	0
		B601	27/12/2015 0:00	0	0	0	0
		C520	13/11/2015 0:00	2	3	3	8
		C521	24/11/2015 0:00	4	5	5	14
		C522	4/12/2015 0:00	25	15	17	57
		C523	18/12/2015 0:00	38	42	26	106
		C601	29/12/2015 0:00	21	25	25	71
		D501A	2/01/2015 0:00	2	0	2	4
		D525	11/11/2015 0:00	1	3	3	7
		D526	24/11/2015 0:00	5	2	5	12
		D527	7/12/2015 0:00	32	27	28	87

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		D601	21/12/2015 0:00	31	28	17	76
		E502	4/01/2015 0:00	0	0	0	0
		E543	2/11/2015 0:00	0	0	0	0
		E544	7/11/2015 0:00	0	0	0	0
		E544A	7/11/2015 0:00	0	0	1	1
		E545	14/11/2015 0:00	0	0	0	0
		E546	21/11/2015 0:00	0	0	0	0
		E547	25/11/2015 0:00	0	0	0	0
		E549N	14/12/2015 0:00	0	0	0	0
		E551	19/12/2015 0:00	0	0	0	0
		E551A	19/12/2015 0:00	0	0	0	0
		E601	27/12/2015 0:00	1	0	0	1
		G502	4/01/2015 0:00	0	0	1	1
		G536	3/11/2015 0:00	0	0	0	0
		G537	8/11/2015 0:00	0	0	0	0
		G537A	8/11/2015 0:00	0	0	0	0
		G538	15/11/2015 0:00	0	0	0	0
		G538A	15/11/2015 0:00	0	0	0	0
		G539	22/11/2015 0:00	0	0	0	0
		G540	29/11/2015 0:00	0	0	0	0
		G540A	29/11/2015 0:00	0	0	0	0
		G541	6/12/2015 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		G541A	6/12/2015 0:00	1	0	0	1
		G542	13/12/2015 0:00	0	0	0	0
		G543	20/12/2015 0:00	0	0	0	0
		G543A	20/12/2015 0:00	0	0	0	0
		G601	27/12/2015 0:00	1	2	0	3
		G601A	27/12/2015 0:00	0	2	1	3
		H557	9/11/2015 0:00	0	0	0	0
		H557A	9/11/2015 0:00	0	0	0	0
		H557B	18/11/2015 0:00	1	0	0	1
		H558	26/11/2015 0:00	0	1	1	2
		H558A	26/11/2015 0:00	0	1	1	2
		H559	1/12/2015 0:00	2	2	6	10
		H559A	1/12/2015 0:00	2	2	0	4
		H560	11/12/2015 0:00	1	0	0	1
		H561	14/12/2015 0:00	0	0	3	3
		H561A	14/12/2015 0:00	5	3	2	10
		H562	18/12/2015 0:00	9	10	5	24
		H562A	18/12/2015 0:00	4	5	3	12
		H601	29/12/2015 0:00	11	15	8	34
		H601A	29/12/2015 0:00	1	1	3	5
		K532	7/11/2015 0:00	0	0	0	0
		K533	17/11/2015 0:00	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
		K534	3/12/2015 0:00	0	0	0	0
		K601	17/12/2015 0:00	0	0	0	0
		M501P	2/01/2015 0:00	41	29	25	95
		M530B	6/11/2015 0:00	0	0	0	0
		M531	24/11/2015 0:00	8	11	13	32
		M532	8/12/2015 0:00	12	15	15	42
		M532A	8/12/2015 0:00	5	6	3	14
		M532B	17/12/2015 0:00	1	3	0	4
		M601	21/12/2015 0:00	16	21	7	44
		M601A	30/12/2015 0:00	1	2	6	9
		R502	3/01/2015 0:00	1	0	0	1
		R502A	3/01/2015 0:00	0	0	0	0
		R549	1/11/2015 0:00	0	0	0	0
		R550	8/11/2015 0:00	0	0	0	0
		R551	15/11/2015 0:00	0	0	2	2
		R554	15/12/2015 0:00	0	0	0	0
		R601	18/12/2015 0:00	2	1	0	3
		S524	9/11/2015 0:00	2	2	2	6
		S525	24/11/2015 0:00	6	1	4	11
		S525A	24/11/2015 0:00	3	3	2	8
		S526	6/12/2015 0:00	6	8	9	23
		S601	20/12/2015 0:00	27	30	19	76

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total
Grand Total				4700	5138	5808	15644

Schedule C

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 Australia - home-ported Carnival cruise ships during Schoolies Periods.

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

Key

CL	Carnival Cruise Lines
PA	P&O Cruises Australia
PC	Princess Cruises

2013/2014 Cruises during Schoolies Period

Company Code	Sail Year	Cruise Code	Unaccompanied Young Passengers
CL	2013	S332	3
		S333	2
		S334	12
		S335	4
		S336	4
		S337	12
		S401	12
	2014	G436	5
		G437	2
		G438	4
		G439	2
		G440	5
		G501	1
		S438	2
		S439	12
		S440	7
		S441	7
	S501	7	
	2015	G502	26
		G538	13
		G539	15
G540		10	
G541		10	
G601	4		

Company Code	Sail Year	Cruise Code	Unaccompanied Young Passengers	
		S502	19	
		S534	2	
		S535	6	
		S537	7	
		S538	14	
		S539	6	
		S601	5	
PA	2013	J341	15	
		J342	5	
			J343	9
			J344	6
			J401	11
			P338	5
			P339	7
			P340	2
			P341	7
			P342	8
			P401	3
			W302	7
			W344	5
			W346	4
			W347	5
			W348	5
			W349	4
			W401	3
		2014	J446	4
			J447	2
			J448	5
			J449	7
			J450	5
			J451	3
			J452	4
			J453	2
			J501	4
			P447	5
			P448	9
	P449		7	
	P450		8	
	P501		4	
	W444	1		
	W445N	4		
	W447	4		
	W448	1		

Company Code	Sail Year	Cruise Code	Unaccompanied Young Passengers
		W501	3
	2015	A547	4
		E546	2
		E548	4
		E549	5
		E550	2
		E551	1
		J543	4
		J544	4
		J545	4
		J548P	27
		J548Q	12
		J548R	9
		J549P	7
		J550N	6
		P540	3
		P542N	5
		P543N	2
		P545P	14
		P545Q	6
		P546	5
		P601	5
		W546N	2
		W546Q	8
		W547	7
		W548	11
		W601	7
PC	2013	1333	1
		5353	1
		5401	1
		7329	1
		9401	2
		5354A	1
		B340	2
		C315	4
		C316	10
		C317	12
		C401	27
		D318	1
		D319	1
		D320	8
		D321	12
		D401	6

Company Code	Sail Year	Cruise Code	Unaccompanied Young Passengers
		M331	1
		M332	3
		M333	2
		M401	13
		S331	2
		S332	2
		S333	7
		S334	5
		S401	10
	2014	1440	1
		1501	1
		2402	2
		3443	1
		6501	1
		C429	23
		C430	18
		C501	10
		D402	12
		D423	8
		D424	10
		D425	13
		D425A	2
		D501	10
		H452	10
		H452A	5
		H501	1
		H501A	3
		K438	1
		M402	15
		M432N	2
		M433N	9
		M501N	12
		R448A	1
		S434	2
		S435	11
		S437	20
		S501	12
	2015	2601	3
		3552	2
		5535	1
		5536	1
		5601	9
		5535A	2

Company Code	Sail Year	Cruise Code	Unaccompanied Young Passengers
		C520	2
		C522	8
		C523	14
		C601	20
		D525	2
		D627	12
		D601	14
		H558	1
		H559	2
		H562	1
		H601	3
		M501P	4
		M531	1
		M532	3
		M532A	1
		M601	2
		M601A	2
		R601	2
		S525	3
		S525A	1
		S526	6
		S601	17
Grand Total			1089

Schedule D

The following pages contain one table providing statistical information referable to the Schoolies Period in relation to how many unaccompanied young passengers aged between 16 - 18 were present on Australian home-ported Carnival cruise ships during Schoolies Periods.

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

Key

CL	Carnival Cruise Lines
PA	P&O Cruises Australia
PC	Princess Cruises

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
CL	S332	2013	11	6/11/2013 0:00	N	30	11	13
CL	S332	2013	11	6/11/2013 0:00	Y	0	0	3
CL	S333	2013	11	16/11/2013 0:00	N	22	61	31
CL	S333	2013	11	16/11/2013 0:00	Y	0	0	2
CL	S334	2013	11	24/11/2013 0:00	N	35	52	67
CL	S334	2013	11	24/11/2013 0:00	Y	2	2	8
CL	S335	2013	12	5/12/2013 0:00	N	47	62	75
CL	S335	2013	12	5/12/2013 0:00	Y	0	1	3
CL	S336	2013	12	13/12/2013 0:00	Y	0	1	3
CL	S336	2013	12	13/12/2013 0:00	N	80	70	75
CL	S337	2013	12	21/12/2013 0:00	N	67	60	55
CL	S337	2013	12	21/12/2013 0:00	Y	2	3	7
CL	S401	2013	12	30/12/2013 0:00	Y	2	2	8

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
CL	S401	2013	12	30/12/2013 0:00	N	76	47	72
CL	S436N	2014	11	2/11/2014 0:00	N	1	4	6
CL	G436	2014	11	6/11/2014 0:00	Y	1	2	2
CL	G436	2014	11	6/11/2014 0:00	N	15	20	25
CL	S437N	2014	11	9/11/2014 0:00	N	30	16	26
CL	G437	2014	11	14/11/2014 0:00	Y	1	0	1
CL	G437	2014	11	14/11/2014 0:00	N	26	24	33
CL	S438	2014	11	20/11/2014 0:00	Y	0	1	1
CL	S438	2014	11	20/11/2014 0:00	N	34	54	59
CL	G438	2014	11	26/11/2014 0:00	N	29	76	76
CL	G438	2014	11	26/11/2014 0:00	Y	1	0	3
CL	S439	2014	12	2/12/2014 0:00	Y	3	4	5
CL	S439	2014	12	2/12/2014 0:00	N	62	59	86
CL	G439	2014	12	6/12/2014 0:00	Y	2	0	0
CL	G439	2014	12	6/12/2014 0:00	N	76	67	84
CL	S440	2014	12	10/12/2014 0:00	Y	1	4	2
CL	S440	2014	12	10/12/2014 0:00	N	68	59	64
CL	G440	2014	12	16/12/2014 0:00	Y	2	1	2
CL	G440	2014	12	16/12/2014 0:00	N	61	62	50
CL	S441	2014	12	18/12/2014 0:00	N	55	64	33
CL	S441	2014	12	18/12/2014 0:00	Y	1	1	5
CL	G501	2014	12	27/12/2014 0:00	N	60	55	34
CL	G501	2014	12	27/12/2014	Y	0	0	1

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
CL	S501	2014	12	30/12/2014 0:00	N	59	42	40
CL	S501	2014	12	30/12/2014 0:00	Y	1	1	5
CL	G502	2015	1	5/01/2015 0:00	Y	8	4	14
CL	G502	2015	1	5/01/2015 0:00	N	64	70	51
CL	S502	2015	1	7/01/2015 0:00	N	78	53	49
CL	S502	2015	1	7/01/2015 0:00	Y	6	5	8
CL	G536	2015	11	4/11/2015 0:00	N	16	15	16
CL	S534	2015	11	7/11/2015 0:00	N	13	16	28
CL	S534	2015	11	7/11/2015 0:00	Y	2	0	0
CL	G537	2015	11	12/11/2015 0:00	N	21	19	24
CL	S535	2015	11	17/11/2015 0:00	N	27	29	43
CL	S535	2015	11	17/11/2015 0:00	Y	0	2	4
CL	G538	2015	11	21/11/2015 0:00	N	32	53	59
CL	G538	2015	11	21/11/2015 0:00	Y	3	3	7
CL	S536	2015	11	27/11/2015 0:00	N	30	29	41
CL	S537	2015	11	30/11/2015 0:00	Y	2	0	5
CL	S537	2015	11	30/11/2015 0:00	N	41	64	83
CL	G539	2015	12	1/12/2015 0:00	N	50	70	89
CL	G539	2015	12	1/12/2015 0:00	Y	3	8	4
CL	S538	2015	12	9/12/2015 0:00	Y	5	4	5
CL	S538	2015	12	9/12/2015 0:00	N	75	81	80
CL	G540	2015	12	12/12/2015 0:00	N	64	66	60

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
CL	G540	2015	12	12/12/2015 0:00	Y	3	4	3
CL	S539	2015	12	19/12/2015 0:00	Y	3	2	1
CL	S539	2015	12	19/12/2015 0:00	N	53	53	37
CL	G541	2015	12	20/12/2015 0:00	N	51	42	23
CL	G541	2015	12	20/12/2015 0:00	Y	2	3	5
CL	S601	2015	12	27/12/2015 0:00	Y	2	0	3
CL	S601	2015	12	27/12/2015 0:00	N	54	42	50
CL	G601	2015	12	30/12/2015 0:00	Y	1	2	1
CL	G601	2015	12	30/12/2015 0:00	N	55	46	43
PA	W302	2013	1	5/01/2013 0:00	N	25	27	38
PA	W302	2013	1	5/01/2013 0:00	Y	3	2	2
PA	J338	2013	11	2/11/2013 0:00	N	3	0	9
PA	P337	2013	11	2/11/2013 0:00	N	1	1	3
PA	J339	2013	11	8/11/2013 0:00	N	6	10	3
PA	P338	2013	11	8/11/2013 0:00	Y	1	1	3
PA	P338	2013	11	8/11/2013 0:00	N	9	10	27
PA	W344	2013	11	9/11/2013 0:00	Y	2	2	1
PA	W344	2013	11	9/11/2013 0:00	N	13	7	23
PA	J340	2013	11	11/11/2013 0:00	N	10	10	22
PA	W345	2013	11	16/11/2013 0:00	N	12	21	13
PA	P339	2013	11	18/11/2013 0:00	Y	1	1	5
PA	P339	2013	11	18/11/2013 0:00	N	17	40	49
PA	J341	2013	11	25/11/2013	Y	4	3	8

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
PA	J341	2013	11	25/11/2013 0:00	N	17	15	91
PA	W346	2013	11	26/11/2013 0:00	Y	1	3	0
PA	W346	2013	11	26/11/2013 0:00	N	13	29	24
PA	P340	2013	11	27/11/2013 0:00	Y	0	0	2
PA	P340	2013	11	27/11/2013 0:00	N	9	16	29
PA	W347	2013	11	30/11/2013 0:00	Y	1	2	2
PA	W347	2013	11	30/11/2013 0:00	N	29	56	54
PA	J342	2013	12	5/12/2013 0:00	N	25	26	38
PA	J342	2013	12	5/12/2013 0:00	Y	3	0	2
PA	W348	2013	12	7/12/2013 0:00	N	30	65	78
PA	W348	2013	12	7/12/2013 0:00	Y	1	2	2
PA	J343	2013	12	9/12/2013 0:00	Y	1	5	3
PA	J343	2013	12	9/12/2013 0:00	N	32	46	73
PA	P341	2013	12	10/12/2013 0:00	N	35	41	66
PA	P341	2013	12	10/12/2013 0:00	Y	2	3	2
PA	W349	2013	12	14/12/2013 0:00	N	33	31	44
PA	W349	2013	12	14/12/2013 0:00	Y	0	1	3
PA	J344	2013	12	18/12/2013 0:00	Y	1	2	3
PA	J344	2013	12	18/12/2013 0:00	N	30	27	45
PA	P342	2013	12	19/12/2013 0:00	N	32	31	23
PA	P342	2013	12	19/12/2013 0:00	Y	5	1	2
PA	W350	2013	12	21/12/2013 0:00	N	22	37	29

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PA	J401	2013	12	28/12/2013 0:00	N	29	30	29
PA	J401	2013	12	28/12/2013 0:00	Y	3	2	6
PA	P401	2013	12	29/12/2013 0:00	N	29	38	48
PA	P401	2013	12	29/12/2013 0:00	Y	1	1	1
PA	W401	2013	12	30/12/2013 0:00	Y	1	1	1
PA	W401	2013	12	30/12/2013 0:00	N	38	36	41
PA	J444	2014	11	1/11/2014 0:00	N	0	0	8
PA	P444	2014	11	1/11/2014 0:00	N	1	1	2
PA	W442	2014	11	1/11/2014 0:00	N	21	8	14
PA	W443	2014	11	5/11/2014 0:00	N	4	7	10
PA	J445	2014	11	7/11/2014 0:00	N	5	4	10
PA	P445	2014	11	7/11/2014 0:00	N	7	10	22
PA	J446	2014	11	10/11/2014 0:00	Y	0	3	1
PA	J446	2014	11	10/11/2014 0:00	N	10	9	34
PA	W444	2014	11	15/11/2014 0:00	Y	0	1	0
PA	W444	2014	11	15/11/2014 0:00	N	20	10	28
PA	J447	2014	11	20/11/2014 0:00	N	11	20	43
PA	J447	2014	11	20/11/2014 0:00	Y	1	0	1
PA	P446	2014	11	21/11/2014 0:00	N	15	14	21
PA	W445N	2014	11	22/11/2014 0:00	N	17	27	29
PA	W445N	2014	11	22/11/2014 0:00	Y	4	0	0
PA	J448	2014	11	24/11/2014 0:00	Y	0	2	3
PA	J448	2014	11	24/11/2014	N	21	11	45

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
PA	J449	2014	11	28/11/2014 0:00	N	18	11	26
PA	J449	2014	11	28/11/2014 0:00	Y	0	4	3
PA	J450	2014	12	1/12/2014 0:00	N	31	37	77
PA	J450	2014	12	1/12/2014 0:00	Y	2	0	3
PA	P447	2014	12	4/12/2014 0:00	N	25	22	49
PA	P447	2014	12	4/12/2014 0:00	Y	1	0	4
PA	W446	2014	12	6/12/2014 0:00	N	34	57	57
PA	P448	2014	12	8/12/2014 0:00	N	26	51	59
PA	P448	2014	12	8/12/2014 0:00	Y	1	3	5
PA	J451	2014	12	11/12/2014 0:00	N	23	17	20
PA	J451	2014	12	11/12/2014 0:00	Y	1	1	1
PA	W447	2014	12	13/12/2014 0:00	Y	2	0	2
PA	W447	2014	12	13/12/2014 0:00	N	34	31	57
PA	J452	2014	12	14/12/2014 0:00	N	30	39	56
PA	J452	2014	12	14/12/2014 0:00	Y	0	0	4
PA	P449	2014	12	17/12/2014 0:00	N	35	30	29
PA	P449	2014	12	17/12/2014 0:00	Y	2	1	4
PA	J453	2014	12	18/12/2014 0:00	Y	1	0	1
PA	J453	2014	12	18/12/2014 0:00	N	40	39	28
PA	W448	2014	12	20/12/2014 0:00	N	33	21	39
PA	W448	2014	12	20/12/2014 0:00	Y	0	0	1
PA	P450	2014	12	27/12/2014 0:00	Y	3	2	3

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PA	P450	2014	12	27/12/2014 0:00	N	32	25	39
PA	J501	2014	12	28/12/2014 0:00	N	31	21	33
PA	J501	2014	12	28/12/2014 0:00	Y	1	1	2
PA	W501	2014	12	29/12/2014 0:00	N	34	26	42
PA	W501	2014	12	29/12/2014 0:00	Y	3	0	0
PA	P501	2014	12	30/12/2014 0:00	Y	0	1	3
PA	P501	2014	12	30/12/2014 0:00	N	32	47	28
PA	J543	2015	11	6/11/2015 0:00	N	3	8	13
PA	J543	2015	11	6/11/2015 0:00	Y	0	1	3
PA	P540	2015	11	6/11/2015 0:00	Y	0	0	3
PA	P540	2015	11	6/11/2015 0:00	N	11	14	21
PA	W544	2015	11	7/11/2015 0:00	N	8	5	12
PA	J544	2015	11	9/11/2015 0:00	N	10	17	15
PA	J544	2015	11	9/11/2015 0:00	Y	1	1	2
PA	P541	2015	11	10/11/2015 0:00	N	7	11	36
PA	E546	2015	11	14/11/2015 0:00	N	0	0	3
PA	E546	2015	11	14/11/2015 0:00	Y	0	0	2
PA	E547	2015	11	15/11/2015 0:00	N	2	1	2
PA	W545	2015	11	17/11/2015 0:00	N	17	9	25
PA	P542N	2015	11	19/11/2015 0:00	N	6	12	14
PA	P542N	2015	11	19/11/2015 0:00	Y	3	0	2
PA	J545	2015	11	20/11/2015 0:00	N	8	14	14
PA	J545	2015	11	20/11/2015	Y	1	3	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
PA	W546N	2015	11	21/11/2015 0:00	N	13	47	29
PA	W546N	2015	11	21/11/2015 0:00	Y	0	0	2
PA	J546	2015	11	23/11/2015 0:00	N	10	14	14
PA	P543N	2015	11	23/11/2015 0:00	Y	0	0	2
PA	P543N	2015	11	23/11/2015 0:00	N	9	14	11
PA	A546	2015	11	24/11/2015 0:00	N	0	0	1
PA	A547	2015	11	25/11/2015 0:00	N	8	8	10
PA	A547	2015	11	25/11/2015 0:00	Y	0	1	3
PA	E548	2015	11	25/11/2015 0:00	N	5	16	29
PA	E548	2015	11	25/11/2015 0:00	Y	0	0	4
PA	P544N	2015	11	26/11/2015 0:00	N	15	14	23
PA	A548	2015	11	27/11/2015 0:00	N	15	12	12
PA	J547	2015	11	27/11/2015 0:00	N	9	8	33
PA	W546Q	2015	11	28/11/2015 0:00	N	43	90	75
PA	W546Q	2015	11	28/11/2015 0:00	Y	0	5	3
PA	A549	2015	11	30/11/2015 0:00	N	20	34	18
PA	J548P	2015	11	30/11/2015 0:00	Y	1	7	19
PA	J548P	2015	11	30/11/2015 0:00	N	19	24	45
PA	E549	2015	12	4/12/2015 0:00	N	12	18	26
PA	E549	2015	12	4/12/2015 0:00	Y	2	2	1
PA	W547	2015	12	5/12/2015 0:00	N	38	65	63
PA	W547	2015	12	5/12/2015 0:00	Y	2	4	1

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PA	A550	2015	12	7/12/2015 0:00	N	18	19	36
PA	E550	2015	12	7/12/2015 0:00	Y	0	1	1
PA	E550	2015	12	7/12/2015 0:00	N	26	37	45
PA	J548Q	2015	12	8/12/2015 0:00	Y	1	3	8
PA	J548Q	2015	12	8/12/2015 0:00	N	21	26	23
PA	P545P	2015	12	9/12/2015 0:00	N	19	24	32
PA	P545P	2015	12	9/12/2015 0:00	Y	3	3	8
PA	J548R	2015	12	10/12/2015 0:00	N	15	17	21
PA	J548R	2015	12	10/12/2015 0:00	Y	0	1	8
PA	W548	2015	12	12/12/2015 0:00	Y	1	4	6
PA	W548	2015	12	12/12/2015 0:00	N	20	57	31
PA	J549P	2015	12	13/12/2015 0:00	Y	1	1	5
PA	J549P	2015	12	13/12/2015 0:00	N	38	33	24
PA	P545Q	2015	12	13/12/2015 0:00	N	42	34	36
PA	P545Q	2015	12	13/12/2015 0:00	Y	0	1	5
PA	E551	2015	12	16/12/2015 0:00	N	15	27	20
PA	E551	2015	12	16/12/2015 0:00	Y	0	0	1
PA	A551	2015	12	17/12/2015 0:00	N	19	17	9
PA	J550N	2015	12	17/12/2015 0:00	Y	1	2	3
PA	J550N	2015	12	17/12/2015 0:00	N	39	37	27
PA	P546	2015	12	17/12/2015 0:00	Y	1	1	3
PA	P546	2015	12	17/12/2015 0:00	N	44	34	23
PA	W549	2015	12	19/12/2015	N	36	33	28

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
PA	A601	2015	12	27/12/2015 0:00	N	21	12	17
PA	P601	2015	12	27/12/2015 0:00	N	38	34	37
PA	P601	2015	12	27/12/2015 0:00	Y	1	1	3
PA	E601	2015	12	28/12/2015 0:00	N	25	28	26
PA	W601	2015	12	28/12/2015 0:00	Y	1	2	4
PA	W601	2015	12	28/12/2015 0:00	N	45	39	42
PA	J601N	2015	12	29/12/2015 0:00	N	21	9	17
PC	5302	2013	1	2/01/2013 0:00	N	1	0	0
PC	K302	2013	1	3/01/2013 0:00	N	0	0	0
PC	9302	2013	1	4/01/2013 0:00	N	1	1	1
PC	3302	2013	1	5/01/2013 0:00	N	0	0	0
PC	A302	2013	1	5/01/2013 0:00	N	0	0	0
PC	A302A	2013	1	5/01/2013 0:00	N	0	0	0
PC	E302	2013	1	6/01/2013 0:00	N	1	0	0
PC	E302A	2013	1	6/01/2013 0:00	N	0	0	0
PC	R302	2013	1	6/01/2013 0:00	N	0	1	0
PC	1333	2013	11	3/11/2013 0:00	Y	0	0	1
PC	1333	2013	11	3/11/2013 0:00	N	0	0	0
PC	5345	2013	11	4/11/2013 0:00	N	0	0	0
PC	6336	2013	11	4/11/2013 0:00	N	0	0	0
PC	7325	2013	11	4/11/2013 0:00	N	0	0	0
PC	7325A	2013	11	4/11/2013 0:00	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	M330P	2013	11	4/11/2013 0:00	N	1	0	0
PC	9336	2013	11	5/11/2013 0:00	N	0	0	0
PC	R335	2013	11	5/11/2013 0:00	N	0	0	0
PC	R335A	2013	11	5/11/2013 0:00	N	0	0	0
PC	5346	2013	11	7/11/2013 0:00	N	0	0	0
PC	C314	2013	11	8/11/2013 0:00	N	1	0	1
PC	3333	2013	11	9/11/2013 0:00	N	0	0	0
PC	B337	2013	11	9/11/2013 0:00	N	0	0	0
PC	E330	2013	11	9/11/2013 0:00	N	0	0	0
PC	E330A	2013	11	9/11/2013 0:00	N	0	0	0
PC	1334	2013	11	10/11/2013 0:00	N	0	0	0
PC	A330	2013	11	10/11/2013 0:00	N	0	0	0
PC	5347	2013	11	11/11/2013 0:00	N	0	0	0
PC	K320	2013	11	11/11/2013 0:00	N	0	0	0
PC	K320A	2013	11	11/11/2013 0:00	N	0	0	0
PC	R335C	2013	11	11/11/2013 0:00	N	0	0	0
PC	S331	2013	11	11/11/2013 0:00	Y	0	2	0
PC	S331	2013	11	11/11/2013 0:00	N	5	3	2
PC	S331A	2013	11	11/11/2013 0:00	N	0	0	0
PC	2336	2013	11	14/11/2013 0:00	N	0	0	0
PC	M331	2013	11	14/11/2013 0:00	N	1	0	2
PC	M331	2013	11	14/11/2013 0:00	Y	0	1	0
PC	5348	2013	11	15/11/2013	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
PC	6337	2013	11	15/11/2013 0:00	N	0	0	0
PC	D318	2013	11	15/11/2013 0:00	N	4	4	3
PC	D318	2013	11	15/11/2013 0:00	Y	0	0	1
PC	3334A	2013	11	16/11/2013 0:00	N	0	0	0
PC	H339	2013	11	16/11/2013 0:00	N	0	0	2
PC	1335	2013	11	17/11/2013 0:00	N	0	0	0
PC	R336	2013	11	17/11/2013 0:00	N	0	1	0
PC	R336A	2013	11	17/11/2013 0:00	N	0	0	0
PC	5349	2013	11	18/11/2013 0:00	N	0	0	0
PC	7326	2013	11	19/11/2013 0:00	N	0	0	0
PC	D319	2013	11	19/11/2013 0:00	N	1	1	0
PC	D319	2013	11	19/11/2013 0:00	Y	1	0	0
PC	E331	2013	11	19/11/2013 0:00	N	0	0	0
PC	E331A	2013	11	19/11/2013 0:00	N	0	0	0
PC	9337	2013	11	20/11/2013 0:00	N	0	0	0
PC	S332	2013	11	21/11/2013 0:00	N	4	7	3
PC	S332	2013	11	21/11/2013 0:00	Y	0	1	1
PC	C315	2013	11	22/11/2013 0:00	N	2	13	9
PC	C315	2013	11	22/11/2013 0:00	Y	1	1	2
PC	3335	2013	11	23/11/2013 0:00	N	0	0	0
PC	3335A	2013	11	23/11/2013 0:00	N	0	0	0
PC	H340	2013	11	23/11/2013 0:00	N	0	1	2

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	K321	2013	11	23/11/2013 0:00	N	0	0	0
PC	K321A	2013	11	23/11/2013 0:00	N	0	0	0
PC	5351	2013	11	24/11/2013 0:00	N	0	0	0
PC	A331	2013	11	25/11/2013 0:00	N	0	0	0
PC	S332A	2013	11	25/11/2013 0:00	N	0	0	0
PC	5352	2013	11	27/11/2013 0:00	N	0	0	0
PC	2337	2013	11	29/11/2013 0:00	N	0	0	0
PC	7327	2013	11	29/11/2013 0:00	N	0	0	0
PC	E332	2013	11	29/11/2013 0:00	N	1	0	1
PC	E332A	2013	11	29/11/2013 0:00	N	0	0	0
PC	R337	2013	11	29/11/2013 0:00	N	0	0	0
PC	3336	2013	11	30/11/2013 0:00	N	0	0	0
PC	B340	2013	11	30/11/2013 0:00	Y	1	0	1
PC	B340	2013	11	30/11/2013 0:00	N	0	0	0
PC	H341	2013	11	30/11/2013 0:00	N	0	1	0
PC	1337	2013	12	1/12/2013 0:00	N	0	0	0
PC	5353	2013	12	1/12/2013 0:00	Y	0	0	1
PC	5353	2013	12	1/12/2013 0:00	N	0	0	0
PC	D320	2013	12	2/12/2013 0:00	N	10	6	8
PC	D320	2013	12	2/12/2013 0:00	Y	1	3	4
PC	C316	2013	12	3/12/2013 0:00	N	14	14	11
PC	C316	2013	12	3/12/2013 0:00	Y	4	0	6
PC	M332	2013	12	3/12/2013	N	5	6	5

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
PC	M332	2013	12	3/12/2013 0:00	Y	0	1	2
PC	5354	2013	12	4/12/2013 0:00	N	1	0	0
PC	5354A	2013	12	4/12/2013 0:00	Y	0	0	1
PC	5354A	2013	12	4/12/2013 0:00	N	1	1	0
PC	S333	2013	12	4/12/2013 0:00	N	1	14	12
PC	S333	2013	12	4/12/2013 0:00	Y	1	2	4
PC	9338	2013	12	5/12/2013 0:00	N	1	0	0
PC	K322	2013	12	5/12/2013 0:00	N	0	0	0
PC	3337A	2013	12	7/12/2013 0:00	N	0	0	0
PC	1338	2013	12	8/12/2013 0:00	N	0	0	0
PC	S333A	2013	12	8/12/2013 0:00	N	1	0	0
PC	7328	2013	12	9/12/2013 0:00	N	0	0	1
PC	E333	2013	12	9/12/2013 0:00	N	0	1	0
PC	E333A	2013	12	9/12/2013 0:00	N	0	0	0
PC	2338	2013	12	10/12/2013 0:00	N	0	0	0
PC	M333	2013	12	11/12/2013 0:00	N	26	14	8
PC	M333	2013	12	11/12/2013 0:00	Y	0	2	0
PC	3338	2013	12	14/12/2013 0:00	N	0	0	0
PC	3338A	2013	12	14/12/2013 0:00	N	0	0	0
PC	1339	2013	12	15/12/2013 0:00	N	1	0	0
PC	D321	2013	12	15/12/2013 0:00	Y	3	3	6
PC	D321	2013	12	15/12/2013 0:00	N	13	18	5

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	H342	2013	12	15/12/2013 0:00	N	2	1	0
PC	C317	2013	12	17/12/2013 0:00	N	23	20	12
PC	C317	2013	12	17/12/2013 0:00	Y	3	4	5
PC	S334	2013	12	17/12/2013 0:00	N	12	17	9
PC	S334	2013	12	17/12/2013 0:00	Y	1	2	2
PC	6340	2013	12	18/12/2013 0:00	N	0	0	0
PC	7329	2013	12	19/12/2013 0:00	N	1	1	1
PC	7329	2013	12	19/12/2013 0:00	Y	0	1	0
PC	E334	2013	12	19/12/2013 0:00	N	0	0	0
PC	E334A	2013	12	19/12/2013 0:00	N	0	0	0
PC	9401	2013	12	20/12/2013 0:00	N	0	0	0
PC	9401	2013	12	20/12/2013 0:00	Y	0	1	1
PC	A401	2013	12	20/12/2013 0:00	N	0	0	0
PC	2401	2013	12	21/12/2013 0:00	N	0	0	0
PC	3339	2013	12	21/12/2013 0:00	N	0	0	0
PC	5401	2013	12	21/12/2013 0:00	Y	1	0	0
PC	5401	2013	12	21/12/2013 0:00	N	1	1	1
PC	B343	2013	12	21/12/2013 0:00	N	0	0	0
PC	D401	2013	12	21/12/2013 0:00	N	11	13	9
PC	D401	2013	12	21/12/2013 0:00	Y	0	3	3
PC	S334A	2013	12	21/12/2013 0:00	N	2	2	1
PC	1340	2013	12	22/12/2013 0:00	N	0	0	0
PC	H343	2013	12	22/12/2013	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
PC	K401	2013	12	23/12/2013 0:00	N	0	1	0
PC	M401	2013	12	23/12/2013 0:00	N	16	19	10
PC	M401	2013	12	23/12/2013 0:00	Y	4	6	3
PC	3401A	2013	12	28/12/2013 0:00	N	0	0	0
PC	6401	2013	12	28/12/2013 0:00	N	0	0	0
PC	C401	2013	12	28/12/2013 0:00	Y	5	8	14
PC	C401	2013	12	28/12/2013 0:00	N	36	29	19
PC	1401	2013	12	29/12/2013 0:00	N	1	0	0
PC	7401	2013	12	29/12/2013 0:00	N	3	1	1
PC	E401	2013	12	29/12/2013 0:00	N	0	0	0
PC	E401A	2013	12	29/12/2013 0:00	N	0	0	0
PC	H401	2013	12	29/12/2013 0:00	N	0	1	1
PC	H401N	2013	12	29/12/2013 0:00	N	0	0	0
PC	S401	2013	12	30/12/2013 0:00	N	22	19	28
PC	S401	2013	12	30/12/2013 0:00	Y	1	4	5
PC	3402	2014	1	4/01/2014 0:00	N	0	0	0
PC	3402A	2014	1	4/01/2014 0:00	N	0	0	0
PC	5402	2014	1	4/01/2014 0:00	N	0	1	0
PC	9402	2014	1	4/01/2014 0:00	N	1	1	0
PC	A402	2014	1	4/01/2014 0:00	N	0	0	0
PC	B402	2014	1	4/01/2014 0:00	N	0	0	0
PC	D402	2014	1	4/01/2014 0:00	N	14	15	9

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	D402	2014	1	4/01/2014 0:00	Y	3	6	3
PC	M402	2014	1	4/01/2014 0:00	Y	6	1	8
PC	M402	2014	1	4/01/2014 0:00	N	35	34	19
PC	1402	2014	1	5/01/2014 0:00	N	3	2	0
PC	2402	2014	1	5/01/2014 0:00	N	3	1	0
PC	2402	2014	1	5/01/2014 0:00	Y	1	0	1
PC	H401P	2014	1	5/01/2014 0:00	N	1	0	0
PC	K402	2014	1	6/01/2014 0:00	N	0	0	0
PC	B451	2014	11	1/11/2014 0:00	N	0	0	0
PC	7426	2014	11	2/11/2014 0:00	N	0	0	0
PC	7426A	2014	11	2/11/2014 0:00	N	0	0	0
PC	D421	2014	11	2/11/2014 0:00	N	1	2	0
PC	5442	2014	11	3/11/2014 0:00	N	0	0	0
PC	R442	2014	11	3/11/2014 0:00	N	0	0	0
PC	1436	2014	11	4/11/2014 0:00	N	0	0	0
PC	1436A	2014	11	4/11/2014 0:00	N	0	0	0
PC	9428N	2014	11	4/11/2014 0:00	N	0	0	0
PC	D421A	2014	11	6/11/2014 0:00	N	0	0	0
PC	G435	2014	11	6/11/2014 0:00	N	0	0	0
PC	K434	2014	11	8/11/2014 0:00	N	0	0	0
PC	R443	2014	11	8/11/2014 0:00	N	0	0	0
PC	6437	2014	11	9/11/2014 0:00	N	0	0	0
PC	7427	2014	11	9/11/2014	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
PC	A437N	2014	11	9/11/2014 0:00	N	0	0	0
PC	G436	2014	11	9/11/2014 0:00	N	0	0	0
PC	5444	2014	11	10/11/2014 0:00	N	0	0	1
PC	C427	2014	11	10/11/2014 0:00	N	2	1	3
PC	H449	2014	11	10/11/2014 0:00	N	2	3	0
PC	2432R	2014	11	11/11/2014 0:00	N	0	0	0
PC	S434	2014	11	12/11/2014 0:00	N	3	1	0
PC	S434	2014	11	12/11/2014 0:00	Y	0	0	2
PC	1437	2014	11	14/11/2014 0:00	N	0	0	0
PC	1437A	2014	11	14/11/2014 0:00	N	0	0	0
PC	9429	2014	11	14/11/2014 0:00	N	0	0	0
PC	3440	2014	11	15/11/2014 0:00	N	0	1	0
PC	D422	2014	11	15/11/2014 0:00	N	0	0	0
PC	R444	2014	11	15/11/2014 0:00	N	0	0	0
PC	R444A	2014	11	15/11/2014 0:00	N	0	0	0
PC	E429	2014	11	16/11/2014 0:00	N	0	0	0
PC	M432N	2014	11	16/11/2014 0:00	N	3	5	5
PC	M432N	2014	11	16/11/2014 0:00	Y	1	0	1
PC	5446	2014	11	17/11/2014 0:00	N	0	0	0
PC	K435	2014	11	18/11/2014 0:00	N	0	0	0
PC	A438	2014	11	19/11/2014 0:00	N	0	0	1
PC	D422A	2014	11	19/11/2014 0:00	N	1	1	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	H449B	2014	11	19/11/2014 0:00	N	0	0	0
PC	6438	2014	11	20/11/2014 0:00	N	0	0	0
PC	7428	2014	11	20/11/2014 0:00	N	0	0	0
PC	7428A	2014	11	20/11/2014 0:00	N	0	0	0
PC	3441	2014	11	22/11/2014 0:00	N	0	0	0
PC	R445	2014	11	22/11/2014 0:00	N	0	0	0
PC	R445A	2014	11	22/11/2014 0:00	N	0	0	0
PC	5448	2014	11	23/11/2014 0:00	N	0	0	0
PC	1438	2014	11	24/11/2014 0:00	N	0	0	0
PC	9430	2014	11	24/11/2014 0:00	N	0	0	0
PC	C428	2014	11	24/11/2014 0:00	N	0	4	4
PC	S435	2014	11	25/11/2014 0:00	Y	2	5	4
PC	S435	2014	11	25/11/2014 0:00	N	3	9	6
PC	2433	2014	11	26/11/2014 0:00	N	0	0	0
PC	5449	2014	11	26/11/2014 0:00	N	1	0	0
PC	H450	2014	11	27/11/2014 0:00	N	3	0	6
PC	H450A	2014	11	27/11/2014 0:00	N	0	0	0
PC	D423	2014	11	28/11/2014 0:00	Y	1	3	4
PC	D423	2014	11	28/11/2014 0:00	N	6	6	13
PC	K436	2014	11	28/11/2014 0:00	N	0	0	0
PC	3442	2014	11	29/11/2014 0:00	N	0	1	0
PC	R446	2014	11	29/11/2014 0:00	N	0	0	0
PC	5450	2014	11	30/11/2014	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
				0:00				
PC	E431	2014	11	30/11/2014 0:00	N	0	0	0
PC	7429	2014	12	1/12/2014 0:00	N	0	0	0
PC	D423A	2014	12	2/12/2014 0:00	N	1	0	0
PC	5451	2014	12	3/12/2014 0:00	N	0	0	0
PC	5451A	2014	12	3/12/2014 0:00	N	0	1	0
PC	1439	2014	12	4/12/2014 0:00	N	0	0	0
PC	A439	2014	12	4/12/2014 0:00	N	0	0	0
PC	C429	2014	12	5/12/2014 0:00	N	26	25	19
PC	C429	2014	12	5/12/2014 0:00	Y	8	6	9
PC	3443	2014	12	6/12/2014 0:00	Y	1	0	0
PC	3443	2014	12	6/12/2014 0:00	N	1	0	0
PC	R447	2014	12	6/12/2014 0:00	N	0	0	0
PC	R447A	2014	12	6/12/2014 0:00	N	0	0	1
PC	2434	2014	12	7/12/2014 0:00	N	0	0	0
PC	E432	2014	12	7/12/2014 0:00	N	0	0	0
PC	H451	2014	12	8/12/2014 0:00	N	3	4	2
PC	H451A	2014	12	8/12/2014 0:00	N	0	1	0
PC	K437	2014	12	8/12/2014 0:00	N	0	0	0
PC	1440	2014	12	9/12/2014 0:00	N	0	0	0
PC	1440	2014	12	9/12/2014 0:00	Y	0	1	0
PC	1440A	2014	12	9/12/2014 0:00	N	0	0	0
PC	S436	2014	12	9/12/2014 0:00	N	5	10	11

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	D424	2014	12	11/12/2014 0:00	N	10	9	6
PC	D424	2014	12	11/12/2014 0:00	Y	4	0	6
PC	6440	2014	12	12/12/2014 0:00	N	0	0	0
PC	3444	2014	12	13/12/2014 0:00	N	1	1	0
PC	R448	2014	12	13/12/2014 0:00	N	0	0	0
PC	R448A	2014	12	13/12/2014 0:00	N	0	0	0
PC	R448A	2014	12	13/12/2014 0:00	Y	0	1	0
PC	G441	2014	12	14/12/2014 0:00	N	1	0	0
PC	M433N	2014	12	14/12/2014 0:00	N	21	24	15
PC	M433N	2014	12	14/12/2014 0:00	Y	4	1	4
PC	D425	2014	12	16/12/2014 0:00	N	14	14	15
PC	D425	2014	12	16/12/2014 0:00	Y	2	3	8
PC	S437	2014	12	16/12/2014 0:00	Y	9	1	10
PC	S437	2014	12	16/12/2014 0:00	N	30	17	15
PC	2435	2014	12	18/12/2014 0:00	N	0	0	0
PC	H452	2014	12	18/12/2014 0:00	Y	3	4	3
PC	H452	2014	12	18/12/2014 0:00	N	14	10	6
PC	H452A	2014	12	18/12/2014 0:00	N	3	1	2
PC	H452A	2014	12	18/12/2014 0:00	Y	0	3	2
PC	K438	2014	12	18/12/2014 0:00	Y	0	0	1
PC	K438	2014	12	18/12/2014 0:00	N	1	1	0
PC	1441	2014	12	19/12/2014 0:00	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	1441A	2014	12	19/12/2014 0:00	N	0	0	0
PC	5501	2014	12	19/12/2014 0:00	N	1	0	0
PC	7501	2014	12	19/12/2014 0:00	N	0	0	0
PC	9501	2014	12	19/12/2014 0:00	N	0	1	0
PC	A501	2014	12	19/12/2014 0:00	N	0	0	0
PC	C430	2014	12	19/12/2014 0:00	Y	5	4	9
PC	C430	2014	12	19/12/2014 0:00	N	19	23	10
PC	M501N	2014	12	19/12/2014 0:00	Y	6	2	4
PC	M501N	2014	12	19/12/2014 0:00	N	26	21	17
PC	3445	2014	12	20/12/2014 0:00	N	0	0	1
PC	D425A	2014	12	20/12/2014 0:00	N	0	0	1
PC	D425A	2014	12	20/12/2014 0:00	Y	1	1	0
PC	R449	2014	12	20/12/2014 0:00	N	1	0	0
PC	R449A	2014	12	20/12/2014 0:00	N	0	0	0
PC	6501	2014	12	23/12/2014 0:00	N	3	1	1
PC	6501	2014	12	23/12/2014 0:00	Y	0	0	1
PC	3501	2014	12	27/12/2014 0:00	N	1	0	0
PC	B463	2014	12	27/12/2014 0:00	N	0	0	0
PC	R501	2014	12	27/12/2014 0:00	N	0	0	0
PC	R501A	2014	12	27/12/2014 0:00	N	1	1	0
PC	K501	2014	12	28/12/2014 0:00	N	0	2	1
PC	1501	2014	12	29/12/2014 0:00	Y	0	1	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	1501	2014	12	29/12/2014 0:00	N	2	2	0
PC	2501	2014	12	29/12/2014 0:00	N	1	0	0
PC	D501	2014	12	29/12/2014 0:00	Y	3	2	5
PC	D501	2014	12	29/12/2014 0:00	N	10	11	8
PC	H501	2014	12	29/12/2014 0:00	Y	0	1	0
PC	H501	2014	12	29/12/2014 0:00	N	3	9	4
PC	H501A	2014	12	29/12/2014 0:00	Y	2	0	1
PC	H501A	2014	12	29/12/2014 0:00	N	4	8	6
PC	S501	2014	12	29/12/2014 0:00	N	18	15	9
PC	S501	2014	12	29/12/2014 0:00	Y	5	3	4
PC	C501	2014	12	30/12/2014 0:00	Y	2	4	4
PC	C501	2014	12	30/12/2014 0:00	N	24	25	10
PC	7502	2015	1	2/01/2015 0:00	N	0	0	0
PC	D501A	2015	1	2/01/2015 0:00	N	2	0	2
PC	M501P	2015	1	2/01/2015 0:00	Y	2	1	1
PC	M501P	2015	1	2/01/2015 0:00	N	39	28	24
PC	3502	2015	1	3/01/2015 0:00	N	0	0	0
PC	5502	2015	1	3/01/2015 0:00	N	0	1	0
PC	6502	2015	1	3/01/2015 0:00	N	0	0	0
PC	9502	2015	1	3/01/2015 0:00	N	0	0	0
PC	A502N	2015	1	3/01/2015 0:00	N	0	0	0
PC	B502	2015	1	3/01/2015 0:00	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	R502	2015	1	3/01/2015 0:00	N	1	0	0
PC	R502A	2015	1	3/01/2015 0:00	N	0	0	0
PC	E502	2015	1	4/01/2015 0:00	N	0	0	0
PC	G502	2015	1	4/01/2015 0:00	N	0	0	1
PC	3503	2015	1	6/01/2015 0:00	N	0	0	0
PC	R549	2015	11	1/11/2015 0:00	N	0	0	0
PC	E543	2015	11	2/11/2015 0:00	N	0	0	0
PC	G536	2015	11	3/11/2015 0:00	N	0	0	0
PC	B541	2015	11	4/11/2015 0:00	N	0	0	0
PC	2523	2015	11	6/11/2015 0:00	N	0	0	0
PC	M530B	2015	11	6/11/2015 0:00	N	0	0	0
PC	6538	2015	11	7/11/2015 0:00	N	0	0	0
PC	E544	2015	11	7/11/2015 0:00	N	0	0	0
PC	E544A	2015	11	7/11/2015 0:00	N	0	0	1
PC	K532	2015	11	7/11/2015 0:00	N	0	0	0
PC	9536	2015	11	8/11/2015 0:00	N	0	0	0
PC	A537	2015	11	8/11/2015 0:00	N	0	0	0
PC	B542	2015	11	8/11/2015 0:00	N	0	0	0
PC	G537	2015	11	8/11/2015 0:00	N	0	0	0
PC	G537A	2015	11	8/11/2015 0:00	N	0	0	0
PC	R550	2015	11	8/11/2015 0:00	N	0	0	0
PC	H557	2015	11	9/11/2015 0:00	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	H557A	2015	11	9/11/2015 0:00	N	0	0	0
PC	S524	2015	11	9/11/2015 0:00	N	2	2	2
PC	1530	2015	11	10/11/2015 0:00	N	0	0	0
PC	D525	2015	11	11/11/2015 0:00	Y	0	0	2
PC	D525	2015	11	11/11/2015 0:00	N	1	3	1
PC	5534	2015	11	12/11/2015 0:00	N	0	2	1
PC	5534A	2015	11	12/11/2015 0:00	N	1	0	0
PC	C520	2015	11	13/11/2015 0:00	N	1	3	2
PC	C520	2015	11	13/11/2015 0:00	Y	1	0	1
PC	3550	2015	11	14/11/2015 0:00	N	0	0	0
PC	E545	2015	11	14/11/2015 0:00	N	0	0	0
PC	A538	2015	11	15/11/2015 0:00	N	0	0	0
PC	B543	2015	11	15/11/2015 0:00	N	0	0	0
PC	G538	2015	11	15/11/2015 0:00	N	0	0	0
PC	G538A	2015	11	15/11/2015 0:00	N	0	0	0
PC	R551	2015	11	15/11/2015 0:00	N	0	0	2
PC	5534B	2015	11	16/11/2015 0:00	N	0	0	0
PC	9538	2015	11	16/11/2015 0:00	N	0	0	0
PC	K533	2015	11	17/11/2015 0:00	N	0	0	0
PC	H557B	2015	11	18/11/2015 0:00	N	1	0	0
PC	1531	2015	11	20/11/2015 0:00	N	0	0	0
PC	1531A	2015	11	20/11/2015 0:00	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	9539	2015	11	20/11/2015 0:00	N	0	0	0
PC	3551	2015	11	21/11/2015 0:00	N	0	0	0
PC	E546	2015	11	21/11/2015 0:00	N	0	0	0
PC	6539	2015	11	22/11/2015 0:00	N	0	2	0
PC	G539	2015	11	22/11/2015 0:00	N	0	0	0
PC	C521	2015	11	24/11/2015 0:00	N	4	5	5
PC	D526	2015	11	24/11/2015 0:00	N	5	2	5
PC	M531	2015	11	24/11/2015 0:00	Y	1	0	0
PC	M531	2015	11	24/11/2015 0:00	N	7	11	13
PC	S525	2015	11	24/11/2015 0:00	Y	1	0	2
PC	S525	2015	11	24/11/2015 0:00	N	5	1	2
PC	S525A	2015	11	24/11/2015 0:00	Y	0	0	1
PC	S525A	2015	11	24/11/2015 0:00	N	3	3	1
PC	2524	2015	11	25/11/2015 0:00	N	0	0	0
PC	5535	2015	11	25/11/2015 0:00	N	3	13	4
PC	5535	2015	11	25/11/2015 0:00	Y	1	0	0
PC	9540	2015	11	25/11/2015 0:00	N	0	0	0
PC	A539	2015	11	25/11/2015 0:00	N	0	1	0
PC	E547	2015	11	25/11/2015 0:00	N	0	0	0
PC	H558	2015	11	26/11/2015 0:00	N	0	1	0
PC	H558	2015	11	26/11/2015 0:00	Y	0	0	1
PC	H558A	2015	11	26/11/2015 0:00	N	0	1	1

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	3552	2015	11	28/11/2015 0:00	N	0	1	0
PC	3552	2015	11	28/11/2015 0:00	Y	0	2	0
PC	5535A	2015	11	29/11/2015 0:00	N	0	0	0
PC	5535A	2015	11	29/11/2015 0:00	Y	1	0	1
PC	9541	2015	11	29/11/2015 0:00	N	2	0	1
PC	B545	2015	11	29/11/2015 0:00	N	0	0	0
PC	G540	2015	11	29/11/2015 0:00	N	0	0	0
PC	G540A	2015	11	29/11/2015 0:00	N	0	0	0
PC	1532	2015	11	30/11/2015 0:00	N	0	0	0
PC	H559	2015	12	1/12/2015 0:00	Y	0	1	1
PC	H559	2015	12	1/12/2015 0:00	N	2	1	5
PC	H559A	2015	12	1/12/2015 0:00	N	2	2	0
PC	7521	2015	12	2/12/2015 0:00	N	0	0	0
PC	K534	2015	12	3/12/2015 0:00	N	0	0	0
PC	9542	2015	12	4/12/2015 0:00	N	0	0	0
PC	9542A	2015	12	4/12/2015 0:00	N	0	0	0
PC	C522	2015	12	4/12/2015 0:00	N	23	13	13
PC	C522	2015	12	4/12/2015 0:00	Y	2	2	4
PC	2525	2015	12	5/12/2015 0:00	N	0	0	0
PC	3553	2015	12	5/12/2015 0:00	N	0	0	0
PC	G541	2015	12	6/12/2015 0:00	N	0	0	0
PC	G541A	2015	12	6/12/2015 0:00	N	1	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	S526	2015	12	6/12/2015 0:00	N	5	6	6
PC	S526	2015	12	6/12/2015 0:00	Y	1	2	3
PC	6540	2015	12	7/12/2015 0:00	N	0	0	0
PC	D527	2015	12	7/12/2015 0:00	N	28	25	22
PC	D527	2015	12	7/12/2015 0:00	Y	4	2	6
PC	5536	2015	12	8/12/2015 0:00	N	23	16	17
PC	5536	2015	12	8/12/2015 0:00	Y	0	0	1
PC	M532	2015	12	8/12/2015 0:00	N	12	14	13
PC	M532	2015	12	8/12/2015 0:00	Y	0	1	2
PC	M532A	2015	12	8/12/2015 0:00	Y	1	0	0
PC	M532A	2015	12	8/12/2015 0:00	N	4	6	3
PC	1533	2015	12	10/12/2015 0:00	N	1	0	1
PC	1533A	2015	12	10/12/2015 0:00	N	0	0	0
PC	H560	2015	12	11/12/2015 0:00	N	1	0	0
PC	3554	2015	12	12/12/2015 0:00	N	1	0	1
PC	5536A	2015	12	12/12/2015 0:00	N	0	1	1
PC	G542	2015	12	13/12/2015 0:00	N	0	0	0
PC	E549N	2015	12	14/12/2015 0:00	N	0	0	0
PC	H561	2015	12	14/12/2015 0:00	N	0	0	3
PC	H561A	2015	12	14/12/2015 0:00	N	5	3	2
PC	R554	2015	12	15/12/2015 0:00	N	0	0	0
PC	6541	2015	12	17/12/2015 0:00	N	0	0	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	K801	2015	12	17/12/2015 0:00	N	0	0	0
PC	M532B	2015	12	17/12/2015 0:00	N	1	3	0
PC	C523	2015	12	18/12/2015 0:00	N	35	37	20
PC	C523	2015	12	18/12/2015 0:00	Y	3	5	6
PC	H562	2015	12	18/12/2015 0:00	Y	0	1	0
PC	H562	2015	12	18/12/2015 0:00	N	9	9	5
PC	H562A	2015	12	18/12/2015 0:00	N	4	5	3
PC	R801	2015	12	18/12/2015 0:00	Y	1	1	0
PC	R801	2015	12	18/12/2015 0:00	N	1	0	0
PC	3555	2015	12	19/12/2015 0:00	N	0	0	0
PC	E551	2015	12	19/12/2015 0:00	N	0	0	0
PC	E551A	2015	12	19/12/2015 0:00	N	0	0	0
PC	1534	2015	12	20/12/2015 0:00	N	1	2	1
PC	2601	2015	12	20/12/2015 0:00	N	1	0	0
PC	2601	2015	12	20/12/2015 0:00	Y	1	1	1
PC	7601	2015	12	20/12/2015 0:00	N	0	0	0
PC	A541	2015	12	20/12/2015 0:00	N	0	0	0
PC	B548	2015	12	20/12/2015 0:00	N	0	0	0
PC	G543	2015	12	20/12/2015 0:00	N	0	0	0
PC	G543A	2015	12	20/12/2015 0:00	N	0	0	0
PC	S601	2015	12	20/12/2015 0:00	N	23	26	10
PC	S601	2015	12	20/12/2015 0:00	Y	4	4	9

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	5601	2015	12	21/12/2015 0:00	Y	2	3	4
PC	5601	2015	12	21/12/2015 0:00	N	19	23	15
PC	9601	2015	12	21/12/2015 0:00	N	2	0	0
PC	D601	2015	12	21/12/2015 0:00	Y	3	4	7
PC	D801	2015	12	21/12/2015 0:00	N	28	24	10
PC	M601	2015	12	21/12/2015 0:00	N	15	21	6
PC	M601	2015	12	21/12/2015 0:00	Y	1	0	1
PC	3601	2015	12	27/12/2015 0:00	N	2	1	0
PC	6601	2015	12	27/12/2015 0:00	N	0	0	0
PC	B601	2015	12	27/12/2015 0:00	N	0	0	0
PC	E601	2015	12	27/12/2015 0:00	N	1	0	0
PC	G601	2015	12	27/12/2015 0:00	N	1	2	0
PC	G601A	2015	12	27/12/2015 0:00	N	0	2	1
PC	C601	2015	12	29/12/2015 0:00	Y	3	7	10
PC	C601	2015	12	29/12/2015 0:00	N	18	18	15
PC	H601	2015	12	29/12/2015 0:00	N	10	15	6
PC	H601	2015	12	29/12/2015 0:00	Y	1	0	2
PC	H601A	2015	12	29/12/2015 0:00	N	1	1	3
PC	1601	2015	12	30/12/2015 0:00	N	0	2	0
PC	1601A	2015	12	30/12/2015 0:00	N	0	0	0
PC	A601	2015	12	30/12/2015 0:00	N	0	0	0
PC	M601A	2015	12	30/12/2015 0:00	N	0	2	5

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18
PC	M601A	2015	12	30/12/2015 0:00	Y	1	0	1
PC	9601C	2015	12	31/12/2015 0:00	N	0	0	0

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20 June 2018

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Dear [REDACTED],

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**).

We refer to:

1. Carnival's previous applications to the Commission for exemptions under section 44(1) and section 44(2) of the Act; and
2. Carnival's current exemption under section 28 of the Act which was granted by the Commission on 22 June 2017 and expires on 22 June 2018 (**Last Exemption**).

We note as follows:

1. The first exemption sought by Carnival was granted by the Commission on 21 December 2010 (**First Exemption**). The First Exemption commenced on 23 December 2010 for a period of 2.5 years, expiring on 22 June 2013.
2. A subsequent exemption sought by Carnival was granted by the Commission on 15 November 2013 (**Second Exemption**). The Second Exemption also operated for a period of 2.5 years, expiring on 15 May 2016.
3. As noted above, a third exemption sought by Carnival was granted by the Commission on 22 June 2017 (**Last Exemption**). The Last Exemption operated for a period of 1 year, and is due to expire on 22 June 2018.

Our client now seeks a further exemption under section 44(2) of the Act for an additional period of 2.5 years on substantially the same terms as the Last Exemption, (save for Carnival's request that the further exemption operate for a further period of 2.5 years as opposed to 1 year only) (**Further Exemption**). The proposed terms of the Further Exemption are set out at **Schedule A**.

Carnival considers that its age restricted cruises policy has been significantly successful in managing incidents of excessive behaviour. Carnival's intention in seeking the Further Exemption is to continue operating in a responsible manner in line with community expectations. Carnival also wishes to acknowledge the important role and contribution of the Commission in supporting Carnival's continued commitment to the health, safety and wellbeing of cruise passengers.

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.

1. Background

Reasons for Original Application for First Exemption and Subsequent Applications for Second Exemption and Last Exemption

- 1.1 Carnival is Australia's leading cruise company and represents 7 cruise brands (including P&O Cruises Australia) in the Australian and New Zealand markets.
- 1.2 Prior to obtaining the First Exemption in 2010, 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.
- 1.3 Carnival attempted to reduce the number and severity of these incidents by obtaining advice from security experts and implementing stringent security measures. These included:
 - (a) increasing restrictions to the access and consumption of alcohol (including refusing to serve alcohol to persons involved in incidents, deactivating alcohol purchasing cards, providing unique wrist bands to passengers who were above-drinking age, and attempting to police the secondary supply of alcohol);
 - (b) tightening its policies and procedures in relation to the access and consumption of alcohol;
 - (c) enhancing the training and instruction of its crew in relation to the above procedures;
 - (d) increasing its pre-boarding and on-boarding searches for contraband alcohol; and
 - (e) increasing its security numbers and presence.
- 1.4 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.

- 1.5 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.
- 1.6 As a result of the above, Carnival sought the First Exemption from the Commission on 7 April 2009 in order to restrict the ability of persons under 21 years of age to take part in cruises without a parent or guardian during the Schoolies Period.
- 1.7 Following significant compromise from Carnival, the Commission granted the First Exemption on 21 December 2010 which permitted Carnival to lawfully restrict the ability of persons 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 First 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. In seeking the Further Exemption, Carnival also relies on the reasons published by the Commission as part of its decision to grant the Second Exemption on 15 November 2013 and the Last Exemption on 22 June 2017.

2. Reasons for Application for Further Exemption

- 2.1 Since the Commission granted the First Exemption, Carnival has observed a significant decrease in the number of alcohol-related security incidents during the Schoolies Period. Alcohol-related security incidents are incidents involving excessive and unacceptable behaviour where alcohol is a contributing factor.
- 2.2 Carnival is of the view that such a decrease is attributable to the First Exemption granted by the Commission in 2010, the Second Exemption granted by the Commission in 2013 and the Last Exemption granted by the Commission in 2017.
- 2.3 For example:
 - (a) On a cruise in December 2005, Carnival recorded 457 separate security incidents on one vessel, during one cruise.
 - (b) In December 2012, across all four Carnival vessels and across all cruises for that month, a total of 67 security incidents were recorded. Carnival 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.

- (c) In December 2014, across six Australian home-ported Carnival vessels and across all cruises on those vessels for that month, a total of 18 security incidents were recorded.
- (d) In December 2015, across six Australian home-ported Carnival vessels and across all cruises on those vessels for that month, a total of 5 security incidents were recorded.
- (e) During the periods of the Second Exemption and the Last Exemption, the reduced number of security incidents continued. For instance, a total of 13 security incidents were recorded in December 2017 across seven Australian home-ported vessels and across all cruises on those vessels for that month.

2.4 Carnival believes that each of the First, Second and Last Exemptions have served to:

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

2.5 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.

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

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

2.8 Carnival considers that the Responsible Adult Requirement (as detailed below) is a key feature of its broader package of measures designed to minimise excessive behaviour. In relation to incidents of excessive behaviour among guests aged 17 to 19 years specifically during the traditional 'Schoolies' period (i.e. from 1 November to 31 January annually), Carnival believes that the Responsible Adult Requirement has driven the decline in security incidents.

- 2.9 As evidenced by the figures in Clause 2.3 above, Carnival now experiences a small handful of security incidents across its Australian home ported ships each month during the Schoolies Period. For completeness, Carnival does not consider these incidents to be attributable to large scale Unauthorised Events or excessive behaviour engaged in by groups.
- 2.10 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 which remain as relevant today as they were at the time Carnival applied for the First Exemption:**
- (a) the onboard environment contains inherent risks, including risks associated with confined spaces and open spaces;
 - (b) whilst at sea, Carnival ships do not have immediate access to shoreside medical facilities or emergency services. Onboard medical centres are staffed with skilled medical professionals but the services offered are naturally more limited than those offered at shoreside hospitals;
 - (c) whilst at sea, Carnival cannot call upon an immediately available police presence and Australian police will not have universal jurisdiction;
 - (d) although onboard security personnel are highly trained and proactive, 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; and
 - (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.
- 2.11 Carnival notes that the Commission, in publishing its:
- (a) Notice to Grant a Temporary Exemption to Carnival on 21 December 2010 (**2010 Notice**);
 - (b) Notice to Grant a Temporary Exemption to Carnival on 15 November 2013 (**2013 Notice**);
 - (c) Notice to Grant a Temporary Exemption to Carnival on 22 June 2017 (**2017 Notice**),

has provided reasons as to why it was appropriate to grant Carnival the First, Second and Last Exemptions. We **enclose** each of these Notices for your convenience as **Schedule B**.

- 2.12 Carnival seeks to rely on these reasons in this application for a Further Exemption. The foundation for Carnival applying for, and being granted the First, Second and Last Exemptions has not changed.

3. Key Criteria for Assessment of Application

2010 Temporary exemptions under the Age Discrimination Act Commission Guidelines (Guidelines)

- 3.1 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.
- 3.2 Carnival has previously addressed a number of these criteria in its:
- (a) application for the First Exemption dated 7 April 2009 (**First Application**);
 - (b) application for the Second Exemption dated 21 June 2013 (**Second Application**); and
 - (c) application for the Last Exemption dated 28 October 2016 (**Last Application**).

Carnival relies on the submissions and evidence which it made in relation to the First, Second and Last Applications. A copy of the First, Second and Last Applications are **enclosed** for your convenience at **Schedule C**.

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

- 3.3 In effect, Carnival seeks an extension of the Last Exemption on substantially the same terms (see **Schedule A**); save for the Further Exemption operating for a further period of 2.5 years as opposed to 1 year only. Carnival believes that the Last Exemption strikes an appropriate and reasonable balance between genuine health and safety concerns, and the rights of persons aged under 19 years of age.
- 3.4 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.
- 3.5 Such a restriction will continue to 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.

- 3.6 Carnival wishes to have the following matters covered in the Further Exemption:
- (a) Carnival has implemented passage terms and conditions which seek 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.
 - (b) Carnival wishes to impose the following restrictions, based on age, in relation to its cruises commencing in Australia:
 - (i) For Carnival cruise ships departing an Australian port between 1 November and 7 January annually, passengers who are under the age of 19 must be accompanied by a responsible adult (**Responsible Adult Requirement**).
 - (A) Carnival may, at its sole and absolute discretion, waive the Responsible Adult Requirement where it is satisfied that a specific passenger under the age of 19 does not present a risk of participating in an Unauthorised Event. Carnival may require any such passenger to sign a code of conduct or provide other commitments as a condition of boarding.
 - (B) Where the Responsible Adult Requirement is mentioned in Carnival's advertising or online booking system, Carnival will state that it has retained a discretion to waive the Responsible Adult Requirement. Carnival will also state that queries/requests for review in relation to a waiver application decision can be made through its complaints handling process and will publish information about this process.
 - (C) Additionally, Carnival will:
 - (1) assess each application for waiver of the Responsible Adult Requirement that it receives;
 - (2) continue to apply its current complaints handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.
 - (ii) 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.

Once this quota is filled, Carnival will apply its Responsible Adult Requirement.

- (A) This quota will not include infants and will also not include passengers under the age of 17, where Carnival believes there is no risk that the minor will participate in an Unauthorised Event. Carnival will otherwise determine how the quota is filled.
- (B) Carnival may, in its sole and absolute discretion, increase this quota where it decides that the increase will not result in a risk to health, safety and security of the passengers and crew, having regard to the purpose of its policy.
- (C) Carnival will assess each application for waiver of the Responsible Adult Requirement (where the quota is filled and it becomes applicable).
- (D) Carnival will continue to apply its current complaints handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.

3.7 In respect of Clause 3.6(b)(i)(B), we provide the relevant extract from Carnival's online booking system below:

"Subject to applicable laws, for cruises departing from an Australian port between 1 November and 7 January, any guest under 19 years of age on the day they board the cruise, must travel in the same room as a responsible adult 19 years or older. In addition, from 8 January to 31 January, there is a limit on the number of guests under 19 years of age who can travel unaccompanied. Once the limit is reached, a responsible adult 19 years or older must travel in the same room. We can advise you at the time of booking whether the limit applies to your booking. P&O Cruises can waive the responsible adult requirement at our discretion. Any requests for review of a waiver application decision can be made by emailing feedback@pocruises.com.au. The responsible adult is accountable for guests under 19 years of age in their room for the duration of the cruise, and the 'Travel Restrictions and Rights of the Captain' under clause 28 will be applied to anyone who displays disruptive behaviour."

Who will be affected by the application?

3.8 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 instance:

- (a) For the first period of approximately two months, this age group can still travel with Carnival provided that they are accompanied by an adult. Notably, Carnival may also waive this requirement in certain circumstances as set out in Clause 3.6(b)(i)(A) above.
- (b) In the second period of approximately one month, an adult may not be required where Carnival has not filled its quota of 60 persons. Notably, Carnival may also increase this quota in certain circumstances as set out in Clause 3.6(b)(ii)(B) above.

Is an exemption necessary?

- 3.9 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, Carnival's conduct may amount to unlawful discrimination under section 14 and/or 15 and 28(b) of the Act.
- 3.10 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.
- 3.11 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.
- 3.12 As stated earlier in this Application, the principal reason why Carnival is seeking an extension of the Last Exemption is an ongoing concern for the health, safety and well-being of all passengers and staff on its vessels.
- 3.13 Carnival is of the firm view that an exemption in the form of the Further Exemption continues to be necessary to enable Carnival to ensure, so far as is reasonably practicable, the health, safety and security of its passengers and crew 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.

Why should an exemption be granted?

- 3.14 We have addressed these reasons earlier in this Application.
- 3.15 We repeat that Carnival's application for 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.

- 3.16 Carnival notes that since the Commission granted the First Exemption to Carnival in 2010, it observed a general decrease in the number of Unauthorised Events and reported incidents involving anti-social behaviour during Schoolies Periods. Carnival further notes that since the Commission granted the Last Exemption to Carnival in 2017, the incidence of Unauthorised Events and reported incidents involving anti-social behaviour during Schoolies Periods has continued to remain low.
- 3.17 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 the First Exemption in 2010, the Second Exemption in 2013 and the Last Exemption in 2017. Carnival believes that, in order to continue to observe a reduced number of Unauthorised Events and reported incidents during Schoolies Periods, a Further Exemption is necessary.
- 3.18 Carnival notes that, in seeking a Further Exemption and in continuing to lawfully undertake the activities described in Clause 3.6 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.
- 3.19 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.
- 3.20 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.
- 3.21 Further, Carnival refers to the 2010 Notice in which the Commission provided its reasons for granting Carnival's First Exemption. Carnival notes that the Commission has stated the following in the 2010 Notice:
- (a) 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.

- (b) 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.
- (c) 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.
- (d) 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.

3.22 The above reasons put forward by the Commission in the 2010 Notice continue to be 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 First 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.

3.23 Additionally, Carnival refers the Commission to the June 2013 Report commissioned by the House of Representatives Standing Committee on Social Policy and Legal Affairs titled "*Troubled Waters - Inquiry into the arrangements surrounding crimes committed at sea*". Whilst the full report can be viewed via the link http://www.aph.gov.au/parliamentary_Business/Committees/House_of_Representatives_Committees?url=spla/crimes%20at%20sea/report/fullreport.pdf, Carnival specifically draws the Commission's attention to the following clauses 4.75 and 4.76 where the Committee expressly indicates its support of Carnival's (then) existing Exemption for the Schoolies Period:

"4.75 Carnival Australia's decision to ban schoolies cruises is a responsible one. However, there is a possibility that other operators will seek to take advantage of the 'schoolies' market and run such cruises in future. The Committee believes that operating 'schoolies cruises' is irresponsible, and expects that operators, informed by the tragedies of recent years, will refrain from doing so.

4.76 The Committee notes that Carnival Australia will soon have to reapply for an exemption for its schoolies-cruise ban. The Human Rights Commission must consider such an exemption on its merits, and the

Committee is fully supportive of Carnival's decision to ban schoolies cruises."

- 3.24 Further, Carnival refers to the 2017 Notice in which the Commission provided its reasons for granting Carnival's Last Exemption. Carnival notes that the Commission has stated the following in the 2017 Notice:
- (a) Carnival's policy pursues a legitimate public policy goal and is appropriately targeted in its approach;
 - (b) the parameters set by Carnival in relation to the Responsible Adult Requirement make it an appropriately targeted approach in terms of age, limited periods of application and flexibility; and
 - (c) Carnival's policy is a reasonable measure having regard to the objects of the Act, and having weighed up the nature and extent of the discriminatory effect against the reasons in favour of the Exemption.

Are there factors that may affect the processing of the Application, (including whether there is a continuing necessity for an exemption under the Act)?

- 3.25 In previous correspondence from the Commission dated 22 June 2017 and in the Conditions contained on page 7 of the 2017 Notice under the heading "Terms and conditions of the Exemption", the Commission requested that Carnival provide a comprehensive report to the Commission by no later than 30 March 2018 as to the following matters:
- (a) *how many applications/requests for waiver of the Responsible Adult Requirement it receives for the 1 November 2017 to 7 January 2018 period and how many of these applications/requests it approves;*
 - (b) *how many applications/requests it receives for waiver of the Responsible Adult Requirement during the 8 January 2018 to 31 January 2018 period, once the quota is filled;*
 - (c) *on how many occasions and to what number it increased the quota;*
 - (d) *how many applicants utilised Carnival's complaints handling process to engage with Carnival further on waiver application decisions;*
 - (e) *any changes to the number or level of Unauthorised Events;*
 - (f) *analysis and evidence that any reduction in Unauthorised Events are a direct result of the restrictions based on age;*
 - (g) *whether, and why, the restrictions continue to be necessary to reduce Unauthorised Events;*
 - (h) *any alternate methods/strategies to reduce Unauthorised Events that it has implemented or trialled; and*

(i) *the success or otherwise of those methods/strategies,*

(altogether, the **Requested Report**).

- 3.26 Carnival complied with the Commission's request and submitted the Requested Report on 29 March 2018. A copy of the Requested Report and accompanying email to the Commission is enclosed as **Schedule D**.
- 3.27 Carnival relies on the matters addressed in the Requested Report in its application for a Further Exemption. In light of the matters contained in the Requested Report, Carnival remains of the firm view that:
- (a) there is an ongoing necessity for an exemption from the Act in the form of the Further Exemption; and
- (b) there are no other practical means of achieving Carnival's aim to minimise and/or prevent Unauthorised Events outside of being granted an exemption in the form of the Further Exemption sought.
- 3.28 In making this application for Further Exemption, Carnival firmly believes that:
- (a) there continues to be a strong demand for Schoolies cruises; and
- (b) cruises operating during the Schoolies Period, (albeit they are not promoted as "Schoolies Cruises") continue to be a popular option for school leavers when choosing a destination for their end of school celebrations.
- 3.29 To demonstrate a clear example of this, as recently as 16 February 2018 (<https://www.cruisecritic.com.au/news/news.cfm?ID=8406>) it was reported on 'Cruise Critic' that a 'Schoolies Cruise' had been advertised and promoted by a third party supplier (SureThing Travel) via the Royal Caribbean cruise line brand (**Royal Caribbean**) without Royal Caribbean's knowledge or authorisation. (We are instructed that Cruise Critic is an independent cruise review community website which also has information for cruise passengers written by editors, news on cruising and a public forum).
- 3.30 Carnival further notes that the same third party supplier, SureThing Travel, is currently advertising Schoolies Packages & Deals for 2018 and 2019, including Schoolies Cruises for 2018. In promoting a Schoolies Cruise on its website which is available to book now, the description of "Inclusions" includes the following (our own emphasis added):

"Access to Parties

Access to Events

All Meals Included

Selected Rooming and Dining

Schoolies Registration

24 Hour Access to the Schoolies Hotline

Access to the Official Schoolies – Cruise group in Advance (To check out who's coming)

Access to Direct Pricing for Great Deals on Unlimited Drinks Packages (18+ only)

Free Exclusive Official Sure Thing Schoolies Cap

Free On Board Credit (Comes with some Cruise packages)"

- 3.31 Copies of the Cruise Critic article dated 16 February 2018 and printouts dated 20 June 2018 from the SureThing Travel website relating to their "Schoolies - Cruise" product are enclosed as **Schedule E**. We also note that SureThing Travel describes itself on its website as "Australia's leader in travel for the 16 to 30 age group" (<https://surething.com.au/about/>) offering "Schoolies (16 to 18 years)" packages, including the "Schoolies Cruise".
- 3.32 This most recent example emphasises the continuing concern of Carnival that large group bookings could turn certain cruises operating in the months from November to January into 'de facto' Schoolies cruises thus impacting the safety and enjoyment of other guests. Carnival's product offerings are designed to be family friendly (particularly its cruises which operate during designated school holiday periods) and Schoolies events have proven to be inconsistent with this.
- 3.33 In light of its past experience, Carnival has no intention of promoting its cruises to school leavers as designated Schoolies cruises in the foreseeable future. Notwithstanding, without an exemption in the form of the Further Exemption, Carnival will have no control over the promotion by third parties (such as travel agents) of its cruises which operate during the Schoolies Period and the impacts of alcohol related security incidents involving Schoolies on its passengers and crew.
- 3.34 Finally, we note that in previous applications for exemption, the Commission has requested that Carnival provide certain additional information such as:
- (a) *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?*
 - (b) *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;*
 - (c) *How many young people were accompanied by an adult, and how many were unaccompanied;*

(altogether, the **Requested Data**).

3.35 For completeness, and to assist the Commission consider Carnival's application for Further Exemption, Carnival provides updated Requested Data for the 2016/2017 and 2017/2018 Schoolies Periods at **Schedules F, G and H.**

* * * * *

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

Yours sincerely



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Schedule A

Terms of the Last Exemption (as set out at 5.1(a) of the decision of the Commission dated 22 June 2017)

Terms of the Exemption

Carnival may impose the following restrictions, based on age, in relation to its cruises commencing in Australia:

- 1. For Carnival cruise-ships departing an Australian port between 1 November and 7 January annually, passengers who are under the age of 19 must be accompanied by a responsible adult (**Responsible Adult Requirement**).*

Carnival may, at its sole and absolute discretion, waive the Responsible Adult Requirement where it is satisfied that a specific passenger under the age of 19 does not present a risk of participating in an Unauthorised Event.

Carnival may require any such passenger to sign a code of conduct or provide other commitments as a condition of boarding.

Where the Responsible Adult Requirement is mentioned in Carnival's advertising or online booking system, Carnival will state that it has retained a discretion to waive the Responsible Adult Requirement. Carnival will also state that queries/requests for review in relation to a waiver application decision can be made through its complaints handling process and will publish information about this process.

Carnival will assess each application for waiver of the Responsible Adult Requirement that it receives.

Carnival will continue its current complaints handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.

- 2. 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 under the age of 19 and not accompanied by a responsible adult. Once this quota is filled, Carnival will apply its Responsible Adult Requirement.*

The quota will not include infants and will also not include passengers under the age of 17, where Carnival believes that the minor does not present a risk of participating in an Unauthorised Event. Carnival will otherwise determine how the quota is filled.

Carnival may, in its sole and absolute discretion, increase this quota where it decides that the increase will not result in a risk to health, safety and security of the passengers and crew, having regard to the purpose of its policy.

Carnival will assess each application for waiver of the Responsible Adult Requirement (where the quota is filled and it becomes applicable).

Carnival will continue its current complaints handling mechanism to allow applicants who are dissatisfied with Carnival's initial assessment on a waiver application to further engage with Carnival on the matter, and Carnival will participate in that process in good faith.

Schedule F

Table 1 provides statistical information referable to the 2016/2017 and 2017/2018 Schoolies Periods in relation to how many:

- Australian home-ported Carnival cruise ships departed from an Australian port, their date of departure and identifying vessel number; and
- passengers aged 16 - 18 years who 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.

Key

CL	Carnival Cruise Lines
PA	P&O Cruises Australia
PC	Princess Cruises

TABLE 1: Cruises during Schoolies Periods 2016/2017 and 2017/2018

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
CL	2016	S636	5/11/2016	23	14	18	696
		G635	7/11/2016	12	16	33	648
		S637	13/11/2016	29	31	53	681
		G636	17/11/2016	15	21	47	628
		S638	22/11/2016	41	51	69	670
		G637	26/11/2016	45	52	80	715
		S639	2/12/2016	47	49	83	821
		G638	6/12/2016	58	63	67	727
		S640	10/12/2016	82	63	89	996
		G639	17/12/2016	67	57	48	879
		S641	18/12/2016	69	45	41	870
		G701	27/12/2016	64	53	43	805
		S701	29/12/2016	57	53	46	785
CL	2017	G702	7/01/2017	68	65	47	858
		G739	3/11/2017	24	20	20	596
		S740	5/11/2017	4	4	9	62
		G740	6/11/2017	21	23	17	612
		S741	11/11/2017	14	25	28	490
		G741	14/11/2017	27	26	16	619
		G742	22/11/2017	20	22	20	458

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		S742	23/11/2017	24	48	62	713
		G743	27/11/2017	39	39	81	674
		S743	2/12/2017	62	64	80	849
		G744	6/12/2017	67	92	94	832
		S744	10/12/2017	90	89	65	986
		G745	16/12/2017	64	58	40	843
		S745	18/12/2017	55	55	43	853
		G801	27/12/2017	36	43	40	715
		S801	28/12/2017	63	56	50	810
		S702	8/01/2017	83	49	64	1029
		S703N	16/01/2017	79	78	48	994
		G703N	17/01/2017	90	74	71	976
		S704N	24/01/2017	48	46	33	837
		G704N	27/01/2017	45	43	31	617
		S705N	29/01/2017	44	33	125	651
		G704P	30/01/2017	10	22	27	496
CL	2018	G802	6/01/2018	60	55	77	928
		S802	8/01/2018	79	57	70	1007
		G803	15/01/2018	72	67	74	1037
		S803	16/01/2018	65	73	74	896
		G804	24/01/2018	61	65	120	897
		S804	28/01/2018	29	26	68	480
PA	2016	E650	4/11/2016	8	3	5	159
		J643	4/11/2016	14	7	22	273
		P645	4/11/2016	12	9	11	157
		W648	5/11/2016	11	7	20	369
		P646	7/11/2016	7	16	27	261
		A647N	10/11/2016	2	1	8	124
		E651N	11/11/2016	7	4	15	160
		P647	11/11/2016	12	12	14	168
		W649	12/11/2016	12	8	22	364
		J644	13/11/2016	14	23	31	319
		A648N	14/11/2016	8	7	9	170
		P648	14/11/2016	14	17	36	256
		E652N	15/11/2016	8	6	12	103
		J645	17/11/2016	12	11	30	257
		W650N	19/11/2016	28	136	66	475
		J646N	21/11/2016	19	25	66	328
		P649	24/11/2016	14	17	21	273
		W651N	26/11/2016	16	14	19	214
		A649N	28/11/2016	20	40	24	229
		P650	28/11/2016	17	24	55	370

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		J647N	29/11/2016	19	17	16	271
		W652N	29/11/2016	44	49	33	418
		E653N	30/11/2016	12	17	60	219
		P651	2/12/2016	11	17	35	215
		J648	3/12/2016	17	24	18	266
		W653	3/12/2016	35	70	50	545
		P652	5/12/2016	44	32	55	400
		A650N	9/12/2016	21	34	43	301
		J649	9/12/2016	10	14	15	215
		E654N	10/12/2016	9	8	17	218
		W654	10/12/2016	33	43	38	539
		J650	12/12/2016	19	27	22	319
		P653	13/12/2016	34	22	57	512
		E655N	14/12/2016	12	15	17	210
		A651N	16/12/2016	13	14	16	210
		J651	16/12/2016	36	31	23	419
		P654	17/12/2016	35	35	32	446
		W655	17/12/2016	30	24	18	448
		E656N	18/12/2016	20	21	26	278
		A652N	19/12/2016	27	18	18	270
		W656	20/12/2016	41	32	30	527
		P655	27/12/2016	25	25	25	362
		W701	27/12/2016	45	34	40	446
		E701N	28/12/2016	12	26	21	246
		A701N	29/12/2016	19	11	18	245
		J701	29/12/2016	24	32	15	376
		P701	30/12/2016	34	42	52	352
PA	2017	A702N	5/01/2017	17	16	32	285
		W702	7/01/2017	36	34	42	542
		A741	3/11/2017	7	4	15	190
		J747	4/11/2017	2	4	5	22
		W754	4/11/2017	1	2	4	34
		X745	4/11/2017	4	6	5	52
		E748N	6/11/2017	6	5	7	184
		A742	10/11/2017	7	3	15	210
		E749N	10/11/2017	8	5	18	120
		J748	10/11/2017	18	15	14	281
		X746	10/11/2017	8	7	15	282
		W755	11/11/2017	11	10	47	429
		E750N	13/11/2017	3	1	16	176
		X747	13/11/2017	18	17	31	413
		A743N	14/11/2017	2	11	18	140

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		J749	14/11/2017	20	0	17	236
		E751N	16/11/2017	6	13	43	238
		J750	16/11/2017	12	5	6	205
		X748	17/11/2017	17	19	21	275
		W756	18/11/2017	10	24	25	244
		J751	20/11/2017	3	6	9	254
		X749	20/11/2017	16	37	41	366
		W757	21/11/2017	22	81	45	439
		A744N	24/11/2017	9	55	49	249
		E752N	24/11/2017	4	7	17	129
		J752	25/11/2017	11	19	10	212
		W758	25/11/2017	39	65	46	498
		E753N	27/11/2017	12	13	28	212
		J753	28/11/2017	7	17	31	293
		X750	30/11/2017	28	26	46	493
		A745N	1/12/2017	24	43	28	278
		E754N	1/12/2017	14	12	22	225
		W759	2/12/2017	51	70	77	576
		J754	3/12/2017	16	21	16	270
		X751	4/12/2017	20	52	100	506
		E755N	7/12/2017	18	15	26	224
		A746N	8/12/2017	13	23	26	278
		J755	9/12/2017	23	28	25	277
		W760	9/12/2017	19	16	26	457
		E756	11/12/2017	10	19	34	236
		J756	12/12/2017	21	25	26	327
		W761	12/12/2017	42	41	41	544
		X752	14/12/2017	30	30	36	472
		A747N	15/12/2017	14	11	18	230
		E757	15/12/2017	11	10	18	217
		J757	16/12/2017	34	21	24	360
		W762	16/12/2017	38	36	31	531
		X753	17/12/2017	42	32	43	537
		A748N	18/12/2017	24	19	10	262
		E758	18/12/2017	22	13	19	278
		A801N	27/12/2017	15	6	28	252
		J801	27/12/2017	22	28	18	313
		X754	27/12/2017	30	33	33	459
		E801N	28/12/2017	17	18	31	233
		W801	28/12/2017	36	34	35	481
		X801	30/12/2017	37	47	57	502
		P702	8/01/2017	35	27	31	391

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		E702N	9/01/2017	20	27	20	267
		J702	9/01/2017	31	29	31	416
		P703	11/01/2017	46	44	51	541
		A703N	12/01/2017	13	17	18	262
		E703N	13/01/2017	17	17	18	268
		J703	13/01/2017	45	40	45	431
		W703	14/01/2017	43	36	54	549
		A704N	16/01/2017	21	37	23	262
		E704N	17/01/2017	19	20	25	270
		P704	19/01/2017	11	16	11	146
		W704N	21/01/2017	31	28	42	351
		P705	24/01/2017	25	25	18	286
		W705N	24/01/2017	24	21	22	249
		E705N	25/01/2017	18	19	18	242
		J704	25/01/2017	31	25	28	354
		A705N	27/01/2017	14	15	29	222
		P706	27/01/2017	24	20	23	251
		E706N	28/01/2017	9	8	20	208
		J705	28/01/2017	13	17	16	260
		W706	28/01/2017	23	31	82	370
		P707	30/01/2017	20	25	31	262
PA	2018	A802N	5/01/2018	29	22	48	298
		W802	6/01/2018	64	86	76	984
		J802	8/01/2018	31	33	29	422
		X802	8/01/2018	47	30	51	543
		E802N	9/01/2018	28	20	30	282
		W803	9/01/2018	37	35	22	520
		A803N	12/01/2018	26	15	32	259
		J803	12/01/2018	35	39	39	430
		E803N	13/01/2018	19	22	22	275
		W804	13/01/2018	44	34	59	761
		X803	16/01/2018	40	30	34	535
		E804P	17/01/2018	14	11	10	125
		A804Q	19/01/2018	22	15	21	219
		X804	19/01/2018	22	23	19	305
		W805	20/01/2018	18	25	68	307
		W805N	20/01/2018	35	40	60	557
		E805P	22/01/2018	23	13	24	273
		A804R	23/01/2018	15	13	12	148
		W806	23/01/2018	14	11	41	224
		J804	24/01/2018	34	28	22	396
		X805	24/01/2018	24	30	31	361

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		E806P	25/01/2018	16	19	17	224
		W807	27/01/2018	32	48	97	743
		X806	27/01/2018	17	20	31	376
		E807N	28/01/2018	9	18	61	256
		A805N	29/01/2018	7	12	26	200
		J805	30/01/2018	5	15	22	231
PC	2016	G637	6/11/2016	0	0	0	0
		G638	13/11/2016	0	0	0	0
		G639	20/11/2016	0	0	0	0
		G701	29/12/2016	0	2	1	16
		S701	21/12/2016	16	23	18	286
		D621	1/11/2016	4	3	8	93
		S620C	4/11/2016	0	0	0	0
		S620E	4/11/2016	0	0	0	0
		B633	5/11/2016	0	0	0	1
		B633A	5/11/2016	0	0	0	0
		R643	5/11/2016	0	0	0	3
		1637A	6/11/2016	0	0	0	0
		D622	6/11/2016	0	1	5	24
		G637A	6/11/2016	0	0	0	0
		E634A	8/11/2016	0	1	0	3
		C620	9/11/2016	1	0	4	46
		K622	9/11/2016	0	0	0	0
		M635	12/11/2016	1	1	1	11
		R644	12/11/2016	0	0	0	2
		A633	13/11/2016	0	0	0	0
		E634B	13/11/2016	1	1	2	20
		G638A	13/11/2016	0	0	0	0
		E635	15/11/2016	7	7	2	59
		1638A	16/11/2016	0	0	0	0
		S621	16/11/2016	0	0	1	14
		S621A	16/11/2016	0	0	0	0
		S621B	18/11/2016	0	1	0	4
		B635	19/11/2016	0	0	0	0
		R645	19/11/2016	0	0	0	0
		C621	20/11/2016	7	15	12	132
		D623	20/11/2016	9	11	19	119
		G639A	20/11/2016	0	0	0	0
		K623	21/11/2016	0	0	0	1
		K623A	21/11/2016	0	0	0	0
		3649A	22/11/2016	0	0	0	0
		A634	23/11/2016	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		2635	1/11/2016	0	0	0	1
		1637	6/11/2016	0	0	0	0
		6638	8/11/2016	0	0	0	1
		9635	10/11/2016	0	0	0	0
		5651	11/11/2016	9	5	6	138
		5652	14/11/2016	3	2	4	107
		1638	16/11/2016	0	0	1	1
		2636	16/11/2016	0	0	0	0
		3648	17/11/2016	0	0	0	0
		6639	18/11/2016	0	0	0	1
		5653	20/11/2016	3	7	11	104
		9636	20/11/2016	0	0	0	1
		3649	22/11/2016	0	0	1	1
		1639	26/11/2016	0	1	0	1
		1639A	26/11/2016	0	0	0	0
		D624	26/11/2016	5	8	5	37
		R646	26/11/2016	1	2	0	8
		3650	27/11/2016	0	0	0	0
		B636	27/11/2016	0	0	0	0
		C622	27/11/2016	8	18	10	105
		G640A	27/11/2016	0	0	1	2
		6640	28/11/2016	0	0	0	2
		E636	28/11/2016	15	14	24	146
		M636	29/11/2016	10	11	9	89
		M636A	29/11/2016	0	1	1	13
		1640	30/11/2016	0	1	0	1
		1640A	30/11/2016	0	0	0	0
		3651	1/12/2016	0	0	0	1
		B637A	3/12/2016	0	0	0	0
		K624	3/12/2016	0	2	0	4
		R647	3/12/2016	1	0	1	8
		S622N	3/12/2016	9	7	12	145
		3652	4/12/2016	1	0	1	7
		3652A	4/12/2016	0	1	0	10
		5654	4/12/2016	16	10	14	140
		5654A	4/12/2016	7	2	3	40
		G641	4/12/2016	1	0	0	11
		G641A	4/12/2016	3	2	2	10
		2637	5/12/2016	1	2	1	6
		9637	5/12/2016	1	3	0	11
		S622A	5/12/2016	0	0	1	3
		S622P	5/12/2016	4	1	1	45

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		5654B	8/12/2016	2	6	2	25
		6641	8/12/2016	0	0	0	0
		D625	9/12/2016	21	19	13	240
		M637	9/12/2016	0	1	0	7
		1641	10/12/2016	0	0	0	0
		R648	10/12/2016	0	0	1	8
		S622B	10/12/2016	3	2	2	23
		B638	11/12/2016	0	0	0	1
		C623	11/12/2016	48	26	18	399
		G642	11/12/2016	0	0	0	0
		E637	12/12/2016	34	30	33	424
		M638	12/12/2016	2	1	0	17
		M638A	12/12/2016	3	1	7	41
		M639	16/12/2016	16	20	18	204
		M639A	16/12/2016	1	4	3	31
		5655	17/12/2016	27	23	14	277
		B639	17/12/2016	0	0	0	0
		B639A	17/12/2016	0	1	1	3
		R649	17/12/2016	0	3	0	3
		6642	18/12/2016	0	0	0	0
		C624	18/12/2016	28	27	14	261
		G643	18/12/2016	0	0	0	0
		G643A	18/12/2016	0	0	0	0
		S623	18/12/2016	22	17	16	316
		E701	19/12/2016	24	21	26	306
		1642	20/12/2016	0	0	1	1
		1642A	20/12/2016	1	0	0	1
		2701	20/12/2016	0	0	1	7
		9701	20/12/2016	2	0	1	9
		K701	20/12/2016	0	0	0	0
		3701	21/12/2016	1	0	0	6
		3701A	21/12/2016	0	0	0	0
		5655A	21/12/2016	3	4	0	38
		A636	22/12/2016	1	0	1	3
		D701	22/12/2016	22	35	17	269
		R650	22/12/2016	0	1	1	3
		B640	23/12/2016	1	0	0	6
		B640A	23/12/2016	0	0	0	2
		M701	27/12/2016	17	17	9	164
		M701A	27/12/2016	4	3	1	21
		6701	28/12/2016	0	0	0	0
		C701	28/12/2016	49	30	33	339

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		1701	30/12/2016	0	0	0	1
		1701A	30/12/2016	0	0	0	1
		5701	30/12/2016	19	28	18	299
		A701	30/12/2016	0	0	0	2
		B701	30/12/2016	0	0	0	0
		B701A	30/12/2016	0	1	0	5
		R701	30/12/2016	1	1	0	9
		3701B	31/12/2016	0	0	0	0
PC	2017	G740	17/12/2017	0	0	0	2
		G801	28/12/2017	1	0	0	5
		S801	22/12/2017	25	19	26	228
		E702	2/01/2017	47	50	37	557
		5701A	3/01/2017	3	1	1	21
		D702	3/01/2017	16	18	19	236
		D702A	3/01/2017	5	2	3	41
		K702	3/01/2017	0	0	0	0
		2702	4/01/2017	1	0	0	5
		3702	4/01/2017	2	4	0	12
		9702	4/01/2017	0	1	1	8
		S702	5/01/2017	29	26	30	368
		B702	6/01/2017	0	0	0	0
		3702A	7/01/2017	0	0	0	0
		6702	7/01/2017	1	1	1	3
		R702	7/01/2017	0	0	0	11
		C702	8/01/2017	19	16	19	237
		C702A	8/01/2017	0	0	0	0
		G702A	8/01/2017	0	1	0	9
		G702N	8/01/2017	1	0	0	1
		M702	8/01/2017	23	24	8	237
		M702A	8/01/2017	2	1	1	21
		S703	8/01/2017	17	19	16	248
		1702	9/01/2017	1	1	0	4
		A702	9/01/2017	0	0	0	1
		E703	10/01/2017	58	52	33	626
		C703A	11/01/2017	0	0	0	2
		C703B	11/01/2017	3	10	4	51
		C703D	11/01/2017	0	0	0	0
		C703F	11/01/2017	0	0	0	1
		5702	12/01/2017	35	24	18	467
		5702	12/01/2017	5	9	5	30
		D702B	12/01/2017	4	6	10	67
		B703A	14/01/2017	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		C703C	15/01/2017	0	0	0	2
		G702B	15/01/2017	0	0	0	0
		G702P	15/01/2017	0	0	1	4
		D703	16/01/2017	27	19	23	233
		6703	17/01/2017	0	0	0	0
		M703	17/01/2017	4	5	7	92
		M703A	17/01/2017	0	0	1	1
		R703	17/01/2017	0	0	0	0
		3703	18/01/2017	0	0	0	3
		5703	18/01/2017	24	20	22	265
		5703A	18/01/2017	2	3	5	34
		1703	19/01/2017	0	0	0	2
		2703	19/01/2017	0	0	0	0
		9703	19/01/2017	0	0	0	3
		K703	20/01/2017	0	0	0	0
		K703A	20/01/2017	0	0	0	0
		E704	21/01/2017	33	37	62	532
		R704	21/01/2017	2	5	0	15
		G703A	22/01/2017	0	0	0	0
		S704	22/01/2017	6	9	9	87
		9704	23/01/2017	0	0	0	0
		A703	24/01/2017	0	0	0	2
		D703A	25/01/2017	8	8	5	63
		5703B	27/01/2017	2	2	3	27
		M704	27/01/2017	0	1	0	5
		M704A	27/01/2017	0	1	0	3
		R705	28/01/2017	0	0	0	0
		1704	29/01/2017	0	0	0	0
		1704A	29/01/2017	0	0	0	0
		D704	29/01/2017	3	1	9	49
		G704	29/01/2017	0	0	0	0
		G704A	29/01/2017	0	0	0	0
		5704	31/01/2017	1	5	9	41
		5723	1/11/2017	4	3	4	73
		S727C	3/11/2017	0	0	0	0
		R747	4/11/2017	0	0	0	10
		1735	5/11/2017	0	0	0	0
		1735A	5/11/2017	0	0	0	0
		E737	5/11/2017	0	0	0	0
		G734	5/11/2017	0	0	0	0
		S728	5/11/2017	6	3	7	68
		C716	6/11/2017	3	2	5	51

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		3729	8/11/2017	0	0	0	0
		9737N	9/11/2017	0	0	0	0
		B732	10/11/2017	0	0	0	0
		M742	10/11/2017	1	0	0	2
		2735	11/11/2017	0	0	0	0
		6738	11/11/2017	0	0	0	0
		K723	11/11/2017	0	0	0	0
		R748	11/11/2017	0	0	0	0
		S729	11/11/2017	0	0	0	14
		E738	12/11/2017	0	0	0	1
		3730	13/11/2017	0	0	0	0
		A731	13/11/2017	0	0	0	0
		H779	13/11/2017	0	0	0	8
		9738N	14/11/2017	0	0	1	2
		1736	15/11/2017	0	0	0	0
		5724	15/11/2017	0	2	2	31
		E739	17/11/2017	0	0	0	0
		C717	18/11/2017	0	2	1	18
		G736	19/11/2017	0	0	0	0
		G736A	19/11/2017	0	0	0	0
		M743	19/11/2017	0	6	4	33
		B733	20/11/2017	0	0	0	0
		6739	21/11/2017	0	0	0	1
		K724	23/11/2017	2	2	1	6
		K724A	23/11/2017	0	0	0	0
		1737	25/11/2017	0	0	0	0
		E741	26/11/2017	0	1	1	3
		G737	26/11/2017	0	0	0	0
		G737A	26/11/2017	0	0	0	0
		S730	26/11/2017	1	5	1	25
		H780	27/11/2017	2	1	3	14
		H780A	27/11/2017	3	0	1	22
		5725	28/11/2017	11	20	17	215
		A732	28/11/2017	1	0	0	2
		9739N	29/11/2017	0	0	0	0
		R751	29/11/2017	0	1	0	2
		1738	30/11/2017	0	0	0	2
		B734	30/11/2017	0	0	0	0
		3733	1/12/2017	0	0	0	1
		5726	1/12/2017	17	19	20	174
		H781	2/12/2017	2	6	4	28
		H781A	2/12/2017	1	3	1	14

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		C718	3/12/2017	10	18	14	157
		E742	3/12/2017	1	0	2	4
		E742A	3/12/2017	0	0	0	6
		G738	3/12/2017	0	0	0	0
		G738A	3/12/2017	0	0	0	0
		K725	5/12/2017	0	1	0	2
		2737	6/12/2017	0	1	0	2
		6740	6/12/2017	0	2	1	5
		A733	8/12/2017	0	0	0	0
		3734	9/12/2017	0	0	0	0
		R752	9/12/2017	2	1	2	20
		S731	9/12/2017	23	19	16	203
		1739	10/12/2017	0	0	0	0
		B735	10/12/2017	0	0	1	3
		M744	11/12/2017	26	20	19	264
		H782	12/12/2017	0	0	0	4
		5727	15/12/2017	30	26	16	349
		H783	15/12/2017	0	1	0	14
		H783A	15/12/2017	6	1	4	55
		9741	16/12/2017	0	0	0	0
		R753	16/12/2017	0	1	2	4
		3735	17/12/2017	0	0	1	2
		C719	17/12/2017	31	34	26	426
		G740A	17/12/2017	0	0	0	0
		A801	18/12/2017	1	1	0	4
		9801	19/12/2017	0	1	1	7
		H784	19/12/2017	9	9	4	78
		H784A	19/12/2017	3	0	2	24
		M745	19/12/2017	19	16	13	197
		1740	20/12/2017	0	0	0	2
		B801	20/12/2017	0	0	0	1
		E801	20/12/2017	0	2	2	6
		2801	21/12/2017	0	0	0	0
		5801	21/12/2017	16	24	19	283
		6801	21/12/2017	3	0	4	14
		C801	21/12/2017	15	20	16	209
		3736	22/12/2017	0	1	1	2
		K801	22/12/2017	0	0	0	0
		R754	23/12/2017	1	1	1	6
		1801	30/12/2017	0	0	1	2
		1801A	30/12/2017	0	0	0	5
		3801	30/12/2017	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		H801	30/12/2017	10	14	10	140
		H801A	30/12/2017	2	1	4	21
		M801	30/12/2017	22	18	20	301
		R801	30/12/2017	1	2	3	8
PC	2018	G802	7/01/2018	0	0	1	1
		S802	4/01/2018	40	62	40	508
		G803	14/01/2018	0	0	1	5
		S803	17/01/2018	26	30	13	233
		S804	30/01/2018	2	6	20	94
		A802	2/01/2018	0	1	1	5
		5802	3/01/2018	20	23	19	299
		5802A	3/01/2018	7	6	2	66
		9802	3/01/2018	0	1	0	4
		B802	3/01/2018	0	0	0	9
		E802	3/01/2018	1	1	0	15
		C802	4/01/2018	1	0	0	2
		C802N	4/01/2018	20	23	20	321
		S802A	4/01/2018	6	5	4	57
		6802	5/01/2018	2	2	1	12
		K802	5/01/2018	0	0	1	2
		R802	6/01/2018	2	3	3	18
		3802	7/01/2018	0	0	0	0
		G802A	7/01/2018	1	0	0	7
		5802B	8/01/2018	4	1	1	22
		1802	9/01/2018	0	0	0	3
		2802	9/01/2018	0	0	0	1
		H802	9/01/2018	28	13	11	235
		H802A	9/01/2018	4	4	3	48
		5803	10/01/2018	26	23	19	284
		M802	11/01/2018	46	42	30	419
		3803	12/01/2018	0	0	0	1
		A803	12/01/2018	0	0	0	1
		B803	13/01/2018	0	0	1	2
		R803	13/01/2018	0	3	1	11
		S802B	13/01/2018	6	5	3	59
		S802C	13/01/2018	1	0	2	10
		G803A	14/01/2018	0	0	0	0
		E803	17/01/2018	0	0	0	1
		9803	18/01/2018	0	0	1	2
		C803N	18/01/2018	26	22	16	357
		1803	19/01/2018	0	0	0	2
		1803A	19/01/2018	0	0	0	0

Cruise Information				Age of Passengers			
Company Code	Sail Year	Cruise Code	Sail Date	Sum of Age 16	Sum of Age 17	Sum of Age 18	Sum of Total Underage
		3804	20/01/2018	0	0	0	0
		6803	20/01/2018	0	0	0	0
		H803	20/01/2018	15	8	8	94
		R804	20/01/2018	0	0	0	4
		C804N	21/01/2018	3	3	4	36
		G804A	21/01/2018	0	1	1	2
		A804	22/01/2018	0	0	0	0
		K803	22/01/2018	0	0	0	0
		K803A	22/01/2018	0	0	0	0
		5804	23/01/2018	13	14	10	183
		2803	24/01/2018	0	0	0	0
		2803A	24/01/2018	0	0	0	0
		H804	24/01/2018	3	3	3	30
		H804A	24/01/2018	0	2	3	7
		5804A	25/01/2018	3	2	2	45
		C804	25/01/2018	0	0	0	0
		M803	25/01/2018	5	4	11	55
		S803A	26/01/2018	4	7	4	61
		B804	27/01/2018	0	0	0	0
		R805	27/01/2018	0	0	0	0
		G805	28/01/2018	0	0	0	0
		G805A	28/01/2018	0	0	0	0
		H805	28/01/2018	0	0	2	5
		H805A	28/01/2018	0	0	0	0
		1804A	29/01/2018	0	0	0	0
		5805	29/01/2018	2	3	9	48
		E804	31/01/2018	0	0	0	0
Grand Total				6743	7110	8230	98282

Schedule G

Table 2 provides statistical information referable to the 2016/2017 and 2017/2018 Schoolies Periods in relation to how many unaccompanied young passengers aged between 16 - 18 were present on Australia - home-ported Carnival cruise ships during these Schoolies Periods.

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

Key

CL	Carnival Cruise Lines
PA	P&O Cruises Australia
PC	Princess Cruises

TABLE 2: Cruises during Schoolies Periods 2016/2017 and 2017/2018

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
CL	2016	S636	5/11/2016 0:00	6	11	2	2	2
		G635	7/11/2016 0:00	7	13	1	1	5
		S637	13/11/2016 0:00	13	15	1	2	10
		G636	17/11/2016 0:00	7	9	2	0	5
		S638	22/11/2016 0:00	12	21	2	2	8
		G637	26/11/2016 0:00	9	13	2	3	4
		S639	2/12/2016 0:00	21	33	3	4	14
		G638	6/12/2016 0:00	16	30	4	6	6
		S640	10/12/2016 0:00	11	15	2	3	6
		G639	17/12/2016 0:00	15	25	6	3	6
		S641	18/12/2016 0:00	11	15	3	1	7
		G701	27/12/2016 0:00	10	24	1	5	4

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
		S701	29/12/2016 0:00	7	12	2	3	2
CL	2017	G702	7/01/2017 0:00	10	15	4	1	5
		G739	3/11/2017 0:00	8	10	2	3	3
		G741	14/11/2017 0:00	2	3	1	1	0
		G742	22/11/2017 0:00	1	2	0	0	1
		S742	23/11/2017 0:00	14	18	1	5	8
		G743	27/11/2017 0:00	5	11	2	1	2
		S743	2/12/2017 0:00	14	21	4	3	7
		G744	6/12/2017 0:00	8	10	1	1	6
		S744	10/12/2017 0:00	14	27	6	2	6
		G745	16/12/2017 0:00	2	4	1	0	1
		S745	18/12/2017 0:00	8	9	2	0	6
		G801	27/12/2017 0:00	3	6	1	2	0
		S801	28/12/2017 0:00	7	15	3	1	3
		S702	8/01/2017 0:00	43	60	8	5	30
		S703N	16/01/2017 0:00	33	52	12	6	15
		G703N	17/01/2017 0:00	42	66	11	8	23
		S704N	24/01/2017 0:00	16	26	6	2	8
		G704N	27/01/2017 0:00	23	31	1	7	15
		S705N	29/01/2017 0:00	77	83	5	3	69
		G704P	30/01/2017 0:00	5	6	0	1	4
CL	2018	G802	6/01/2018 0:00	18	26	3	6	9
		S802	8/01/2018 0:00	37	61	3	6	28
		G803	15/01/2018	58	81	8	14	36

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
			0:00					
		S803	16/01/2018 0:00	39	56	6	11	22
		G804	24/01/2018 0:00	95	117	11	14	70
		S804	28/01/2018 0:00	25	34	4	4	17
PA	2016	P645	4/11/2016 0:00	2	3	0	1	1
		W648	5/11/2016 0:00	7	7	1	1	5
		P646	7/11/2016 0:00	2	2	0	0	2
		E651N	11/11/2016 0:00	2	2	0	0	2
		W649	12/11/2016 0:00	4	5	0	2	2
		J644	13/11/2016 0:00	6	9	2	3	1
		E652N	15/11/2016 0:00	2	2	0	0	2
		J645	17/11/2016 0:00	4	6	1	2	1
		W650N	19/11/2016 0:00	25	25	4	14	7
		J646N	21/11/2016 0:00	5	5	0	1	4
		P649	24/11/2016 0:00	4	4	0	0	4
		W651N	26/11/2016 0:00	6	8	0	2	4
		A649N	28/11/2016 0:00	2	2	1	1	0
		P650	28/11/2016 0:00	6	6	0	1	5
		W652N	29/11/2016 0:00	6	7	2	4	0
		E653N	30/11/2016 0:00	2	4	0	0	2
		P651	2/12/2016 0:00	1	2	0	0	1
		J648	3/12/2016 0:00	8	16	4	3	1
		W653	3/12/2016 0:00	14	23	0	6	8
		P652	5/12/2016 0:00	5	6	1	1	3

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
		A650N	9/12/2016 0:00	3	4	1	0	2
		J649	9/12/2016 0:00	2	2	1	0	1
		E654N	10/12/2016 0:00	6	7	1	3	2
		W654	10/12/2016 0:00	6	8	1	4	1
		J650	12/12/2016 0:00	1	2	0	1	0
		P653	13/12/2016 0:00	10	12	3	0	7
		A651N	16/12/2016 0:00	4	4	1	1	2
		J651	16/12/2016 0:00	3	4	1	1	1
		P654	17/12/2016 0:00	8	17	2	1	5
		W655	17/12/2016 0:00	3	3	0	3	0
		E656N	18/12/2016 0:00	6	6	1	2	3
		A652N	19/12/2016 0:00	1	2	1	0	0
		W656	20/12/2016 0:00	5	8	2	0	3
		P655	27/12/2016 0:00	2	4	1	0	1
		W701	27/12/2016 0:00	2	4	0	2	0
		E701N	28/12/2016 0:00	3	5	1	1	1
		A701N	29/12/2016 0:00	2	2	0	0	2
		J701	29/12/2016 0:00	2	3	1	1	0
		P701	30/12/2016 0:00	2	2	1	0	1
PA	2017	A702N	5/01/2017 0:00	6	7	2	0	4
		W702	7/01/2017 0:00	2	2	0	0	2
		E749N	10/11/2017 0:00	4	10	2	0	2
		J748	10/11/2017 0:00	1	2	0	0	1
		W755	11/11/2017	4	4	0	0	4

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
			0:00					
		E750N	13/11/2017 0:00	2	2	0	0	2
		X747	13/11/2017 0:00	6	6	0	1	5
		E751N	16/11/2017 0:00	15	18	2	6	7
		X748	17/11/2017 0:00	8	11	0	2	6
		W756	18/11/2017 0:00	2	2	0	1	1
		J751	20/11/2017 0:00	3	9	0	1	2
		X749	20/11/2017 0:00	3	4	1	0	2
		W757	21/11/2017 0:00	4	4	0	3	1
		A744N	24/11/2017 0:00	5	5	0	0	5
		E752N	24/11/2017 0:00	6	9	1	1	4
		J752	25/11/2017 0:00	5	6	0	3	2
		W758	25/11/2017 0:00	7	12	4	2	1
		E753N	27/11/2017 0:00	1	2	0	0	1
		J753	28/11/2017 0:00	13	16	0	3	10
		X750	30/11/2017 0:00	10	14	2	3	5
		A745N	1/12/2017 0:00	3	6	1	2	0
		E754N	1/12/2017 0:00	7	7	1	2	4
		W759	2/12/2017 0:00	13	17	5	2	6
		J754	3/12/2017 0:00	2	2	1	0	1
		X751	4/12/2017 0:00	7	13	1	1	5
		E755N	7/12/2017 0:00	1	4	0	0	1
		A746N	8/12/2017 0:00	2	2	1	0	1
		J755	9/12/2017 0:00	2	2	2	0	0

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
		W760	9/12/2017 0:00	5	7	1	0	4
		E756	11/12/2017 0:00	6	6	0	0	6
		J756	12/12/2017 0:00	5	6	1	2	2
		W761	12/12/2017 0:00	8	11	1	1	6
		X752	14/12/2017 0:00	5	5	1	0	4
		A747N	15/12/2017 0:00	2	2	0	0	2
		E757	15/12/2017 0:00	7	9	1	0	6
		W762	16/12/2017 0:00	12	16	1	3	8
		X753	17/12/2017 0:00	10	12	0	4	6
		A748N	18/12/2017 0:00	2	3	1	0	1
		A801N	27/12/2017 0:00	1	2	0	0	1
		J801	27/12/2017 0:00	2	2	1	0	1
		E801N	28/12/2017 0:00	5	6	0	0	5
		W801	28/12/2017 0:00	5	6	0	1	4
		X801	30/12/2017 0:00	17	28	6	3	8
		P702	8/01/2017 0:00	10	12	3	1	6
		E702N	9/01/2017 0:00	5	5	1	0	4
		J702	9/01/2017 0:00	8	12	2	0	6
		P703	11/01/2017 0:00	24	28	2	4	18
		A703N	12/01/2017 0:00	1	1	0	0	1
		E703N	13/01/2017 0:00	12	12	2	4	6
		J703	13/01/2017 0:00	13	22	6	1	6
		W703	14/01/2017 0:00	28	35	3	4	21
		A704N	16/01/2017	3	4	1	1	1

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
			0:00					
		E704N	17/01/2017 0:00	12	17	2	2	8
		P704	19/01/2017 0:00	8	11	0	3	5
		W704N	21/01/2017 0:00	15	19	4	2	9
		P705	24/01/2017 0:00	7	8	2	2	3
		W705N	24/01/2017 0:00	7	9	2	2	3
		E705N	25/01/2017 0:00	3	5	0	1	2
		J704	25/01/2017 0:00	6	10	1	0	5
		A705N	27/01/2017 0:00	8	8	2	0	6
		P706	27/01/2017 0:00	7	9	0	2	5
		E706N	28/01/2017 0:00	1	1	0	0	1
		J705	28/01/2017 0:00	4	5	0	1	3
		W706	28/01/2017 0:00	41	42	3	3	35
		P707	30/01/2017 0:00	17	24	3	3	11
PA	2018	A802N	5/01/2018 0:00	1	2	0	0	1
		W802	6/01/2018 0:00	26	39	1	6	19
		J802	8/01/2018 0:00	13	15	3	2	8
		X802	8/01/2018 0:00	34	43	1	7	26
		E802N	9/01/2018 0:00	12	16	3	3	6
		W803	9/01/2018 0:00	15	20	3	2	10
		A803N	12/01/2018 0:00	8	13	2	0	6
		J803	12/01/2018 0:00	22	33	2	5	15
		E803N	13/01/2018 0:00	10	10	3	2	5
		W804	13/01/2018 0:00	31	47	6	5	20

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
		X803	16/01/2018 0:00	11	12	1	0	10
		E804P	17/01/2018 0:00	2	2	0	1	1
		A804Q	19/01/2018 0:00	6	6	0	1	5
		X804	19/01/2018 0:00	4	8	1	1	2
		W805	20/01/2018 0:00	31	33	1	5	25
		W805N	20/01/2018 0:00	29	39	4	2	23
		E805P	22/01/2018 0:00	10	13	1	1	8
		A804R	23/01/2018 0:00	3	4	0	0	3
		W806	23/01/2018 0:00	15	18	1	0	14
		J804	24/01/2018 0:00	10	13	2	1	7
		X805	24/01/2018 0:00	16	21	3	2	11
		E806P	25/01/2018 0:00	10	12	3	2	5
		W807	27/01/2018 0:00	38	58	0	6	32
		X806	27/01/2018 0:00	6	6	1	0	5
		E807N	28/01/2018 0:00	26	31	1	2	23
		A805N	29/01/2018 0:00	9	10	0	1	8
		J805	30/01/2018 0:00	11	12	0	2	9
PC	2016	S701	21/12/2016 0:00	4	6	1	3	0
		D621	1/11/2016 0:00	2	2	0	0	2
		E635	15/11/2016 0:00	2	2	0	1	1
		C621	20/11/2016 0:00	3	5	1	0	2
		D623	20/11/2016 0:00	3	4	1	1	1
		5651	11/11/2016 0:00	1	2	1	0	0
		5652	14/11/2016	1	1	0	0	1

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
			0:00					
		5653	20/11/2016 0:00	1	3	0	0	1
		E636	28/11/2016 0:00	2	2	2	0	0
		M636	29/11/2016 0:00	2	2	1	0	1
		S622N	3/12/2016 0:00	3	5	1	0	2
		3652A	4/12/2016 0:00	1	3	0	1	0
		5654	4/12/2016 0:00	3	5	0	0	3
		G641A	4/12/2016 0:00	1	2	0	1	0
		2637	5/12/2016 0:00	1	2	0	1	0
		D625	9/12/2016 0:00	4	6	1	2	1
		M637	9/12/2016 0:00	1	2	0	1	0
		S622B	10/12/2016 0:00	1	2	0	0	1
		C623	11/12/2016 0:00	12	18	5	3	4
		E637	12/12/2016 0:00	11	17	3	3	5
		M638A	12/12/2016 0:00	1	3	0	0	1
		M639	16/12/2016 0:00	11	15	3	3	5
		M639A	16/12/2016 0:00	2	2	1	0	1
		5655	17/12/2016 0:00	5	6	1	4	0
		B639A	17/12/2016 0:00	2	3	0	1	1
		C624	18/12/2016 0:00	2	2	2	0	0
		S623	18/12/2016 0:00	8	16	3	4	1
		E701	19/12/2016 0:00	5	8	2	0	3
		D701	22/12/2016 0:00	10	13	2	6	2
		R650	22/12/2016 0:00	2	2	0	1	1

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
		M701	27/12/2016 0:00	10	19	2	4	4
		M701A	27/12/2016 0:00	1	2	0	1	0
		C701	28/12/2016 0:00	18	30	11	3	4
		5701	30/12/2016 0:00	9	14	1	5	3
PC	2017	S801	22/12/2017 0:00	3	7	1	2	0
		E702	2/01/2017 0:00	6	10	0	3	3
		5701A	3/01/2017 0:00	1	1	1	0	0
		D702	3/01/2017 0:00	6	10	2	4	0
		D702A	3/01/2017 0:00	1	3	1	0	0
		9702	4/01/2017 0:00	2	6	0	1	1
		S702	5/01/2017 0:00	16	29	5	6	5
		6702	7/01/2017 0:00	2	2	1	0	1
		C716	6/11/2017 0:00	1	2	0	0	1
		K724	23/11/2017 0:00	2	2	2	0	0
		H780A	27/11/2017 0:00	2	3	1	0	1
		H781	2/12/2017 0:00	2	2	1	0	1
		S731	9/12/2017 0:00	1	1	0	1	0
		M744	11/12/2017 0:00	1	1	1	0	0
		C719	17/12/2017 0:00	7	11	4	1	2
		H784	19/12/2017 0:00	2	2	0	0	2
		M745	19/12/2017 0:00	4	4	3	0	1
		E801	20/12/2017 0:00	1	2	0	0	1
		H801	30/12/2017 0:00	2	5	0	0	2
		M801	30/12/2017	1	2	0	1	0

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
			0:00					
		C702	8/01/2017 0:00	16	22	6	4	6
		M702	8/01/2017 0:00	7	11	3	1	3
		S703	8/01/2017 0:00	8	9	2	2	4
		1702	9/01/2017 0:00	1	2	1	0	0
		E703	10/01/2017 0:00	18	28	7	7	4
		C703B	11/01/2017 0:00	2	4	0	1	1
		5702	12/01/2017 0:00	19	30	5	9	5
		D702B	12/01/2017 0:00	7	11	1	1	5
		D703	16/01/2017 0:00	9	13	4	1	4
		M703	17/01/2017 0:00	1	3	0	0	1
		5703	18/01/2017 0:00	7	13	1	1	5
		E704	21/01/2017 0:00	45	60	7	9	29
		S704	22/01/2017 0:00	3	7	0	3	0
		D703A	25/01/2017 0:00	2	3	0	1	1
		5704	31/01/2017 0:00	3	5	0	2	1
		5727	15/12/2017 0:00	3	8	2	1	0
		9801	19/12/2017 0:00	1	4	0	1	0
		3736	22/12/2017 0:00	2	2	0	1	1
PC	2018	5802A	3/01/2018 0:00	1	1	1	0	0
		E802	3/01/2018 0:00	1	2	0	1	0
		C802N	4/01/2018 0:00	3	4	1	2	0
		S802	4/01/2018 0:00	23	33	3	5	15
		S802A	4/01/2018 0:00	1	2	0	1	0

Cruise Information				Age of Unaccompanied Passengers				
Company Code	Sail Year	Cruise Code	Sail Date	Age 16 to 18	Age 0 to 18	Sum of Age 16	Sum of Age 17	Sum of Age 18
		R802	6/01/2018 0:00	4	6	2	1	1
		S803	17/01/2018 0:00	3	3	2	1	0
		S804	30/01/2018 0:00	5	7	0	1	4
		5802	3/01/2018 0:00	4	11	2	2	0
		H802	9/01/2018 0:00	9	9	5	0	4
		H802A	9/01/2018 0:00	2	4	0	0	2
		5803	10/01/2018 0:00	5	7	1	1	3
		M802	11/01/2018 0:00	12	16	2	4	6
		R803	13/01/2018 0:00	2	4	0	1	1
		C803N	18/01/2018 0:00	13	17	3	6	4
		H803	20/01/2018 0:00	3	5	2	0	1
		5804	23/01/2018 0:00	7	11	2	1	4
		H804	24/01/2018 0:00	1	2	0	0	1
		5805	29/01/2018 0:00	2	2	0	0	2
Grand Total				2284	3195	427	486	1371

Schedule H

Table 3 provides the same information as contained in Schedules F and G albeit consolidated into a different format.

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

Key

CL	Carnival Cruise Lines
PA	P&O Cruises Australia
PC	Princess Cruises

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
CL	S636	2016	11	5/11/2016	N	21	12	16	49	685	1839
CL	S636	2016	11	5/11/2016	Y	2	2	2	6	11	0
CL	G635	2016	11	7/11/2016	N	11	15	28	54	635	1876
CL	G635	2016	11	7/11/2016	Y	1	1	5	7	13	0
CL	S637	2016	11	13/11/2016	Y	1	2	10	13	15	0
CL	S637	2016	11	13/11/2016	N	28	29	43	100	666	1905
CL	G636	2016	11	17/11/2016	Y	2	0	5	7	9	0
CL	G636	2016	11	17/11/2016	N	13	21	42	76	619	1929
CL	S638	2016	11	22/11/2016	N	39	49	61	149	649	1916
CL	S638	2016	11	22/11/2016	Y	2	2	8	12	21	0
CL	G637	2016	11	26/11/2016	Y	2	3	4	9	13	0
CL	G637	2016	11	26/11/2016	N	43	49	76	168	702	1836
CL	S639	2016	12	2/12/2016	Y	3	4	14	21	33	0
CL	S639	2016	12	2/12/2016	N	44	45	69	158	788	1794
CL	G638	2016	12	6/12/2016	N	54	57	61	172	697	1846
						6743	7110	8230	98282	479256	

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
CL	G638	2016	12	6/12/2016	Y	4	6	6	16	30	0
CL	S640	2016	12	10/12/2016	Y	2	3	6	11	15	0
CL	S640	2016	12	10/12/2016	N	80	60	83	223	981	1617
CL	G639	2016	12	17/12/2016	N	61	54	42	157	854	1758
CL	G639	2016	12	17/12/2016	Y	6	3	6	15	25	0
CL	S641	2016	12	18/12/2016	N	66	44	34	144	855	1749
CL	S641	2016	12	18/12/2016	Y	3	1	7	11	15	0
CL	G701	2016	12	27/12/2016	N	63	48	39	150	781	1835
CL	G701	2016	12	27/12/2016	Y	1	5	4	10	24	0
CL	S701	2016	12	29/12/2016	N	55	50	44	149	773	1833
CL	S701	2016	12	29/12/2016	Y	2	3	2	7	12	0
CL	G702	2017	1	7/01/2017	N	64	64	42	170	843	1786
CL	G702	2017	1	7/01/2017	Y	4	1	5	10	15	0
CL	S702	2017	1	8/01/2017	Y	8	5	30	43	60	0
CL	S702	2017	1	8/01/2017	N	75	44	34	153	969	1617
CL	S703N	2017	1	16/01/2017	Y	12	6	15	33	52	0
CL	S703N	2017	1	16/01/2017	N	67	72	33	172	942	1632
CL	G703N	2017	1	17/01/2017	N	79	66	48	193	910	1641
CL	G703N	2017	1	17/01/2017	Y	11	8	23	42	66	0
CL	S704N	2017	1	24/01/2017	Y	6	2	8	16	26	0
CL	S704N	2017	1	24/01/2017	N	42	44	25	111	811	1779
CL	G704N	2017	1	27/01/2017	Y	1	7	15	23	31	0
CL	G704N	2017	1	27/01/2017	N	44	36	16	96	586	2005
CL	S705N	2017	1	29/01/2017	Y	5	3	69	77	83	0
CL	S705N	2017	1	29/01/2017	N	39	30	56	125	568	1965
CL	G704P	2017	1	30/01/2017	N	10	21	23	54	490	2117
CL	G704P	2017	1	30/01/2017	Y	0	1	4	5	6	0
CL	G739	2017	11	3/11/2017	N	22	17	17	56	586	2041
CL	G739	2017	11	3/11/2017	Y	2	3	3	8	10	0
CL	S740	2017	11	5/11/2017	N	4	4	9	17	62	2252

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
CL	G740	2017	11	6/11/2017	N	21	23	17	61	612	1920
CL	S741	2017	11	11/11/2017	N	14	25	28	67	490	2027
CL	G741	2017	11	14/11/2017	Y	1	1	0	2	3	0
CL	G741	2017	11	14/11/2017	N	26	25	16	67	616	1956
CL	G742	2017	11	22/11/2017	Y	0	0	1	1	2	0
CL	G742	2017	11	22/11/2017	N	20	22	19	61	456	2101
CL	S742	2017	11	23/11/2017	Y	1	5	8	14	18	0
CL	S742	2017	11	23/11/2017	N	23	43	54	120	695	1886
CL	G743	2017	11	27/11/2017	N	37	38	79	154	663	1908
CL	G743	2017	11	27/11/2017	Y	2	1	2	5	11	0
CL	S743	2017	12	2/12/2017	Y	4	3	7	14	21	0
CL	S743	2017	12	2/12/2017	N	58	61	73	192	828	1775
CL	G744	2017	12	6/12/2017	N	66	91	88	245	822	1778
CL	G744	2017	12	6/12/2017	Y	1	1	6	8	10	0
CL	S744	2017	12	10/12/2017	N	84	87	59	230	959	1607
CL	S744	2017	12	10/12/2017	Y	6	2	6	14	27	0
CL	G745	2017	12	16/12/2017	Y	1	0	1	2	4	0
CL	G745	2017	12	16/12/2017	N	63	58	39	160	839	1788
CL	S745	2017	12	18/12/2017	Y	2	0	6	8	9	0
CL	S745	2017	12	18/12/2017	N	53	55	37	145	844	1749
CL	G801	2017	12	27/12/2017	Y	1	2	0	3	6	0
CL	G801	2017	12	27/12/2017	N	35	41	40	116	709	1889
CL	S801	2017	12	28/12/2017	Y	3	1	3	7	15	0
CL	S801	2017	12	28/12/2017	N	60	55	47	162	795	1770
CL	G802	2018	1	6/01/2018	Y	3	6	9	18	26	0
CL	G802	2018	1	6/01/2018	N	57	49	68	174	902	1710
CL	S802	2018	1	8/01/2018	N	76	51	42	169	946	1609
CL	S802	2018	1	8/01/2018	Y	3	6	28	37	61	0
CL	G803	2018	1	15/01/2018	Y	8	14	36	58	81	0
CL	G803	2018	1	15/01/2018	N	64	53	38	155	956	1588

6743 7110 8230 98282 479256

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
CL	S803	2018	1	16/01/2018	Y	6	11	22	39	56	0
CL	S803	2018	1	16/01/2018	N	59	62	52	173	840	1725
CL	G804	2018	1	24/01/2018	Y	11	14	70	95	117	0
CL	G804	2018	1	24/01/2018	N	50	51	50	151	780	1740
CL	S804	2018	1	28/01/2018	N	25	22	51	98	446	2056
CL	S804	2018	1	28/01/2018	Y	4	4	17	25	34	0
PA	E650	2016	11	4/11/2016	N	8	3	5	16	159	1274
PA	J643	2016	11	4/11/2016	N	14	7	22	43	273	1632
PA	P645	2016	11	4/11/2016	Y	0	1	1	2	3	0
PA	P645	2016	11	4/11/2016	N	12	8	10	30	154	1626
PA	W648	2016	11	5/11/2016	Y	1	1	5	7	7	0
PA	W648	2016	11	5/11/2016	N	10	6	15	31	362	1590
PA	P646	2016	11	7/11/2016	N	7	16	25	48	259	1559
PA	P646	2016	11	7/11/2016	Y	0	0	2	2	2	0
PA	A647N	2016	11	10/11/2016	N	2	1	8	11	124	1332
PA	E651N	2016	11	11/11/2016	Y	0	0	2	2	2	0
PA	E651N	2016	11	11/11/2016	N	7	4	13	24	158	1252
PA	P647	2016	11	11/11/2016	N	12	12	14	38	168	1655
PA	W649	2016	11	12/11/2016	Y	0	2	2	4	5	0
PA	W649	2016	11	12/11/2016	N	12	6	20	38	359	1611
PA	J644	2016	11	13/11/2016	Y	2	3	1	6	9	0
PA	J644	2016	11	13/11/2016	N	12	20	30	62	310	1603
PA	A648N	2016	11	14/11/2016	N	8	7	9	24	170	1329
PA	P648	2016	11	14/11/2016	N	14	17	36	67	256	1520
PA	E652N	2016	11	15/11/2016	Y	0	0	2	2	2	0
PA	E652N	2016	11	15/11/2016	N	8	6	10	24	101	1234
PA	J645	2016	11	17/11/2016	N	11	9	29	49	251	1676
PA	J645	2016	11	17/11/2016	Y	1	2	1	4	6	0
PA	W650N	2016	11	19/11/2016	Y	4	14	7	25	25	0
PA	W650N	2016	11	19/11/2016	N	24	122	59	205	450	1542

6743 7110 8230 98282 479256

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PA	J646N	2016	11	21/11/2016	Y	0	1	4	5	5	0
PA	J646N	2016	11	21/11/2016	N	19	24	62	105	323	1565
PA	P649	2016	11	24/11/2016	Y	0	0	4	4	4	0
PA	P649	2016	11	24/11/2016	N	14	17	17	48	269	1544
PA	W651N	2016	11	26/11/2016	Y	0	2	4	6	8	0
PA	W651N	2016	11	26/11/2016	N	16	12	15	43	206	1753
PA	A649N	2016	11	28/11/2016	N	19	39	24	82	227	1203
PA	A649N	2016	11	28/11/2016	Y	1	1	0	2	2	0
PA	P650	2016	11	28/11/2016	Y	0	1	5	6	6	0
PA	P650	2016	11	28/11/2016	N	17	23	50	90	364	1439
PA	J647N	2016	11	29/11/2016	N	19	17	16	52	271	1674
PA	W652N	2016	11	29/11/2016	N	42	45	33	120	411	1561
PA	W652N	2016	11	29/11/2016	Y	2	4	0	6	7	0
PA	E653N	2016	11	30/11/2016	Y	0	0	2	2	4	0
PA	E653N	2016	11	30/11/2016	N	12	17	58	87	215	1249
PA	P651	2016	12	2/12/2016	N	11	17	34	62	213	1596
PA	P651	2016	12	2/12/2016	Y	0	0	1	1	2	0
PA	J648	2016	12	3/12/2016	N	13	21	17	51	250	1670
PA	J648	2016	12	3/12/2016	Y	4	3	1	8	16	0
PA	W653	2016	12	3/12/2016	N	35	64	42	141	522	1456
PA	W653	2016	12	3/12/2016	Y	0	6	8	14	23	0
PA	P652	2016	12	5/12/2016	Y	1	1	3	5	6	0
PA	P652	2016	12	5/12/2016	N	43	31	52	126	394	1410
PA	A650N	2016	12	9/12/2016	N	20	34	41	95	297	1167
PA	A650N	2016	12	9/12/2016	Y	1	0	2	3	4	0
PA	J649	2016	12	9/12/2016	N	9	14	14	37	213	1711
PA	J649	2016	12	9/12/2016	Y	1	0	1	2	2	0
PA	E654N	2016	12	10/12/2016	Y	1	3	2	6	7	0
PA	E654N	2016	12	10/12/2016	N	8	5	15	28	211	1259
PA	W654	2016	12	10/12/2016	N	32	39	37	108	531	1483

6743 7110 8230 98282 479256

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PA	W654	2016	12	10/12/2016	Y	1	4	1	6	8	479256
PA	J650	2016	12	12/12/2016	N	19	26	22	67	317	1613
PA	J650	2016	12	12/12/2016	Y	0	1	0	1	2	0
PA	P653	2016	12	13/12/2016	Y	3	0	7	10	12	0
PA	P653	2016	12	13/12/2016	N	31	22	50	103	500	1302
PA	E655N	2016	12	14/12/2016	N	12	15	17	44	210	1231
PA	A651N	2016	12	16/12/2016	N	12	13	14	39	206	1242
PA	A651N	2016	12	16/12/2016	Y	1	1	2	4	4	0
PA	J651	2016	12	16/12/2016	Y	1	1	1	3	4	0
PA	J651	2016	12	16/12/2016	N	35	30	22	87	415	1490
PA	P654	2016	12	17/12/2016	N	33	34	27	94	429	1355
PA	P654	2016	12	17/12/2016	Y	2	1	5	8	17	0
PA	W655	2016	12	17/12/2016	N	30	21	18	69	445	1583
PA	W655	2016	12	17/12/2016	Y	0	3	0	3	3	0
PA	E656N	2016	12	18/12/2016	Y	1	2	3	6	6	0
PA	E656N	2016	12	18/12/2016	N	19	19	23	61	272	1199
PA	A652N	2016	12	19/12/2016	Y	1	0	0	1	2	0
PA	A652N	2016	12	19/12/2016	N	26	18	18	62	268	1178
PA	W656	2016	12	20/12/2016	Y	2	0	3	5	8	0
PA	W656	2016	12	20/12/2016	N	39	32	27	98	519	1485
PA	P655	2016	12	27/12/2016	Y	1	0	1	2	4	0
PA	P655	2016	12	27/12/2016	N	24	25	24	73	358	1449
PA	W701	2016	12	27/12/2016	N	45	32	40	117	442	1572
PA	W701	2016	12	27/12/2016	Y	0	2	0	2	4	0
PA	E701N	2016	12	28/12/2016	Y	1	1	1	3	5	0
PA	E701N	2016	12	28/12/2016	N	11	25	20	56	241	1221
PA	A701N	2016	12	29/12/2016	N	19	11	16	46	243	1233
PA	A701N	2016	12	29/12/2016	Y	0	0	2	2	2	0
PA	J701	2016	12	29/12/2016	N	23	31	15	69	373	1564
PA	J701	2016	12	29/12/2016	Y	1	1	0	2	3	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PA	P701	2016	12	30/12/2016	Y	1	0	1	2	2	0
PA	P701	2016	12	30/12/2016	N	33	42	51	126	350	1459
PA	A702N	2017	1	5/01/2017	N	15	16	28	59	278	1183
PA	A702N	2017	1	5/01/2017	Y	2	0	4	6	7	0
PA	W702	2017	1	7/01/2017	Y	0	0	2	2	2	0
PA	W702	2017	1	7/01/2017	N	36	34	40	110	540	1472
PA	P702	2017	1	8/01/2017	N	32	26	25	83	379	1393
PA	P702	2017	1	8/01/2017	Y	3	1	6	10	12	0
PA	E702N	2017	1	9/01/2017	Y	1	0	4	5	5	0
PA	E702N	2017	1	9/01/2017	N	19	27	16	62	262	1208
PA	J702	2017	1	9/01/2017	Y	2	0	6	8	12	0
PA	J702	2017	1	9/01/2017	N	29	29	25	83	404	1512
PA	P703	2017	1	11/01/2017	N	44	40	33	117	513	1266
PA	P703	2017	1	11/01/2017	Y	2	4	18	24	28	0
PA	A703N	2017	1	12/01/2017	Y	0	0	1	1	1	0
PA	A703N	2017	1	12/01/2017	N	13	17	17	47	261	1224
PA	E703N	2017	1	13/01/2017	N	15	13	12	40	256	1212
PA	E703N	2017	1	13/01/2017	Y	2	4	6	12	12	0
PA	J703	2017	1	13/01/2017	N	39	39	39	117	409	1511
PA	J703	2017	1	13/01/2017	Y	6	1	6	13	22	0
PA	W703	2017	1	14/01/2017	N	40	32	33	105	514	1452
PA	W703	2017	1	14/01/2017	Y	3	4	21	28	35	0
PA	A704N	2017	1	16/01/2017	Y	1	1	1	3	4	0
PA	A704N	2017	1	16/01/2017	N	20	36	22	78	258	1181
PA	E704N	2017	1	17/01/2017	Y	2	2	8	12	17	0
PA	E704N	2017	1	17/01/2017	N	17	18	17	52	253	1200
PA	P704	2017	1	19/01/2017	N	11	13	6	30	135	1652
PA	P704	2017	1	19/01/2017	Y	0	3	5	8	11	0
PA	W704N	2017	1	21/01/2017	N	27	26	33	86	332	1588
PA	W704N	2017	1	21/01/2017	Y	4	2	9	15	19	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PA	P705	2017	1	24/01/2017	Y	2	2	3	7	8	479256
PA	P705	2017	1	24/01/2017	N	23	23	15	61	278	1521
PA	W705N	2017	1	24/01/2017	N	22	19	19	60	240	1665
PA	W705N	2017	1	24/01/2017	Y	2	2	3	7	9	0
PA	E705N	2017	1	25/01/2017	Y	0	1	2	3	5	0
PA	E705N	2017	1	25/01/2017	N	18	18	16	52	237	1240
PA	J704	2017	1	25/01/2017	N	30	25	23	78	344	1568
PA	J704	2017	1	25/01/2017	Y	1	0	5	6	10	0
PA	A705N	2017	1	27/01/2017	N	12	15	23	50	214	1241
PA	A705N	2017	1	27/01/2017	Y	2	0	6	8	8	0
PA	P706	2017	1	27/01/2017	Y	0	2	5	7	9	0
PA	P706	2017	1	27/01/2017	N	24	18	18	60	242	1553
PA	E706N	2017	1	28/01/2017	N	9	8	19	36	207	1275
PA	E706N	2017	1	28/01/2017	Y	0	0	1	1	1	0
PA	J705	2017	1	28/01/2017	N	13	16	13	42	255	1686
PA	J705	2017	1	28/01/2017	Y	0	1	3	4	5	0
PA	W706	2017	1	28/01/2017	N	20	28	47	95	328	1554
PA	W706	2017	1	28/01/2017	Y	3	3	35	41	42	0
PA	P707	2017	1	30/01/2017	Y	3	3	11	17	24	0
PA	P707	2017	1	30/01/2017	N	17	22	20	59	238	1456
PA	A741	2017	11	3/11/2017	N	7	4	15	26	190	1237
PA	J747	2017	11	4/11/2017	N	2	4	5	11	22	1850
PA	W754	2017	11	4/11/2017	N	1	2	4	7	34	1854
PA	X745	2017	11	4/11/2017	N	4	6	5	15	52	2228
PA	E748N	2017	11	6/11/2017	N	6	5	7	18	184	1253
PA	A742	2017	11	10/11/2017	N	7	3	15	25	210	1242
PA	E749N	2017	11	10/11/2017	Y	2	0	2	4	10	0
PA	E749N	2017	11	10/11/2017	N	6	5	16	27	110	1339
PA	J748	2017	11	10/11/2017	Y	0	0	1	1	2	0
PA	J748	2017	11	10/11/2017	N	18	15	13	46	279	1641

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PA	X746	2017	11	10/11/2017	N	8	7	15	30	282	2019
PA	W755	2017	11	11/11/2017	Y	0	0	4	4	4	0
PA	W755	2017	11	11/11/2017	N	11	10	43	64	425	1589
PA	E750N	2017	11	13/11/2017	Y	0	0	2	2	2	0
PA	E750N	2017	11	13/11/2017	N	3	1	14	18	174	1193
PA	X747	2017	11	13/11/2017	Y	0	1	5	6	6	0
PA	X747	2017	11	13/11/2017	N	18	16	26	60	407	1909
PA	A743N	2017	11	14/11/2017	N	2	11	18	31	140	1290
PA	J749	2017	11	14/11/2017	N	20	0	17	37	236	1650
PA	E751N	2017	11	16/11/2017	Y	2	6	7	15	18	0
PA	E751N	2017	11	16/11/2017	N	4	7	36	47	220	1167
PA	J750	2017	11	16/11/2017	N	12	5	6	23	205	1683
PA	X748	2017	11	17/11/2017	N	17	17	15	49	264	2028
PA	X748	2017	11	17/11/2017	Y	0	2	6	8	11	0
PA	W756	2017	11	18/11/2017	N	10	23	24	57	242	1745
PA	W756	2017	11	18/11/2017	Y	0	1	1	2	2	0
PA	J751	2017	11	20/11/2017	N	3	5	7	15	245	1665
PA	J751	2017	11	20/11/2017	Y	0	1	2	3	9	0
PA	X749	2017	11	20/11/2017	Y	1	0	2	3	4	0
PA	X749	2017	11	20/11/2017	N	15	37	39	91	362	1937
PA	W757	2017	11	21/11/2017	N	22	78	44	144	435	1556
PA	W757	2017	11	21/11/2017	Y	0	3	1	4	4	0
PA	A744N	2017	11	24/11/2017	Y	0	0	5	5	5	0
PA	A744N	2017	11	24/11/2017	N	9	55	44	108	244	1197
PA	E752N	2017	11	24/11/2017	N	3	6	13	22	120	1329
PA	E752N	2017	11	24/11/2017	Y	1	1	4	6	9	0
PA	J752	2017	11	25/11/2017	Y	0	3	2	5	6	0
PA	J752	2017	11	25/11/2017	N	11	16	8	35	206	1707
PA	W758	2017	11	25/11/2017	N	35	63	45	143	486	1522
PA	W758	2017	11	25/11/2017	Y	4	2	1	7	12	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PA	E753N	2017	11	27/11/2017	Y	0	0	1	1	2	0
PA	E753N	2017	11	27/11/2017	N	12	13	27	52	210	1229
PA	J753	2017	11	28/11/2017	N	7	14	21	42	277	1646
PA	J753	2017	11	28/11/2017	Y	0	3	10	13	16	0
PA	X750	2017	11	30/11/2017	N	26	23	41	90	479	1819
PA	X750	2017	11	30/11/2017	Y	2	3	5	10	14	0
PA	A745N	2017	12	1/12/2017	Y	1	2	0	3	6	0
PA	A745N	2017	12	1/12/2017	N	23	41	28	92	272	1195
PA	E754N	2017	12	1/12/2017	Y	1	2	4	7	7	0
PA	E754N	2017	12	1/12/2017	N	13	10	18	41	218	1239
PA	W759	2017	12	2/12/2017	Y	5	2	6	13	17	0
PA	W759	2017	12	2/12/2017	N	46	68	71	185	559	1447
PA	J754	2017	12	3/12/2017	Y	1	0	1	2	2	0
PA	J754	2017	12	3/12/2017	N	15	21	15	51	268	1664
PA	X751	2017	12	4/12/2017	Y	1	1	5	7	13	0
PA	X751	2017	12	4/12/2017	N	19	51	95	165	493	1814
PA	E755N	2017	12	7/12/2017	Y	0	0	1	1	4	0
PA	E755N	2017	12	7/12/2017	N	18	15	25	58	220	1244
PA	A746N	2017	12	8/12/2017	N	12	23	25	60	276	1172
PA	A746N	2017	12	8/12/2017	Y	1	0	1	2	2	0
PA	J755	2017	12	9/12/2017	Y	2	0	0	2	2	0
PA	J755	2017	12	9/12/2017	N	21	28	25	74	275	1643
PA	W760	2017	12	9/12/2017	Y	1	0	4	5	7	0
PA	W760	2017	12	9/12/2017	N	18	16	22	56	450	1568
PA	E756	2017	12	11/12/2017	Y	0	0	6	6	6	0
PA	E756	2017	12	11/12/2017	N	10	19	28	57	230	1195
PA	J756	2017	12	12/12/2017	N	20	23	24	67	321	1613
PA	J756	2017	12	12/12/2017	Y	1	2	2	5	6	0
PA	W761	2017	12	12/12/2017	Y	1	1	6	8	11	0
PA	W761	2017	12	12/12/2017	N	41	40	35	116	533	1475

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PA	X752	2017	12	14/12/2017	N	29	30	32	91	467	1805
PA	X752	2017	12	14/12/2017	Y	1	0	4	5	5	0
PA	A747N	2017	12	15/12/2017	N	14	11	16	41	228	1231
PA	A747N	2017	12	15/12/2017	Y	0	0	2	2	2	0
PA	E757	2017	12	15/12/2017	N	10	10	12	32	208	1249
PA	E757	2017	12	15/12/2017	Y	1	0	6	7	9	0
PA	J757	2017	12	16/12/2017	N	34	21	24	79	360	1570
PA	W762	2017	12	16/12/2017	Y	1	3	8	12	16	0
PA	W762	2017	12	16/12/2017	N	37	33	23	93	515	1479
PA	X753	2017	12	17/12/2017	Y	0	4	6	10	12	0
PA	X753	2017	12	17/12/2017	N	42	28	37	107	525	1764
PA	A748N	2017	12	18/12/2017	Y	1	0	1	2	3	0
PA	A748N	2017	12	18/12/2017	N	23	19	9	51	259	1196
PA	E758	2017	12	18/12/2017	N	22	13	19	54	278	1186
PA	A801N	2017	12	27/12/2017	N	15	6	27	48	250	1218
PA	A801N	2017	12	27/12/2017	Y	0	0	1	1	2	0
PA	J801	2017	12	27/12/2017	N	21	28	17	66	311	1626
PA	J801	2017	12	27/12/2017	Y	1	0	1	2	2	0
PA	X754	2017	12	27/12/2017	N	30	33	33	96	459	1851
PA	E801N	2017	12	28/12/2017	Y	0	0	5	5	6	0
PA	E801N	2017	12	28/12/2017	N	17	18	26	61	227	1257
PA	W801	2017	12	28/12/2017	N	36	33	31	100	475	1554
PA	W801	2017	12	28/12/2017	Y	0	1	4	5	6	0
PA	X801	2017	12	30/12/2017	N	31	44	49	124	474	1812
PA	X801	2017	12	30/12/2017	Y	6	3	8	17	28	0
PA	A802N	2018	1	5/01/2018	N	29	22	47	98	296	1171
PA	A802N	2018	1	5/01/2018	Y	0	0	1	1	2	0
PA	W802	2018	1	6/01/2018	N	63	80	57	200	945	3056
PA	W802	2018	1	6/01/2018	Y	1	6	19	26	39	0
PA	J802	2018	1	8/01/2018	Y	3	2	8	13	15	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PA	J802	2018	1	8/01/2018	N	28	31	21	80	407	1507
PA	X802	2018	1	8/01/2018	N	46	23	25	94	500	1768
PA	X802	2018	1	8/01/2018	Y	1	7	26	34	43	0
PA	E802N	2018	1	9/01/2018	Y	3	3	6	12	16	0
PA	E802N	2018	1	9/01/2018	N	25	17	24	66	266	1180
PA	W803	2018	1	9/01/2018	Y	3	2	10	15	20	0
PA	W803	2018	1	9/01/2018	N	34	33	12	79	500	1502
PA	A803N	2018	1	12/01/2018	Y	2	0	6	8	13	0
PA	A803N	2018	1	12/01/2018	N	24	15	26	65	246	1209
PA	J803	2018	1	12/01/2018	Y	2	5	15	22	33	0
PA	J803	2018	1	12/01/2018	N	33	34	24	91	397	1508
PA	E803N	2018	1	13/01/2018	Y	3	2	5	10	10	0
PA	E803N	2018	1	13/01/2018	N	16	20	17	53	265	1191
PA	W804	2018	1	13/01/2018	N	38	29	39	106	714	3003
PA	W804	2018	1	13/01/2018	Y	6	5	20	31	47	0
PA	X803	2018	1	16/01/2018	N	39	30	24	93	523	1743
PA	X803	2018	1	16/01/2018	Y	1	0	10	11	12	0
PA	E804P	2018	1	17/01/2018	Y	0	1	1	2	2	0
PA	E804P	2018	1	17/01/2018	N	14	10	9	33	123	1287
PA	A804Q	2018	1	19/01/2018	N	22	14	16	52	213	1257
PA	A804Q	2018	1	19/01/2018	Y	0	1	5	6	6	0
PA	X804	2018	1	19/01/2018	Y	1	1	2	4	8	0
PA	X804	2018	1	19/01/2018	N	21	22	17	60	297	2017
PA	W805	2018	1	20/01/2018	Y	1	5	25	31	33	0
PA	W805	2018	1	20/01/2018	N	17	20	43	80	274	1676
PA	W805N	2018	1	20/01/2018	N	31	38	37	106	518	1461
PA	W805N	2018	1	20/01/2018	Y	4	2	23	29	39	0
PA	E805P	2018	1	22/01/2018	N	22	12	16	50	260	1180
PA	E805P	2018	1	22/01/2018	Y	1	1	8	10	13	0
PA	A804R	2018	1	23/01/2018	Y	0	0	3	3	4	0

6743 7110 8230 98282 479256

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PA	A804R	2018	1	23/01/2018	N	15	13	9	37	144	1249
PA	W806	2018	1	23/01/2018	Y	1	0	14	15	18	0
PA	W806	2018	1	23/01/2018	N	13	11	27	51	206	1748
PA	J804	2018	1	24/01/2018	Y	2	1	7	10	13	0
PA	J804	2018	1	24/01/2018	N	32	27	15	74	383	1521
PA	X805	2018	1	24/01/2018	N	21	28	20	69	340	1926
PA	X805	2018	1	24/01/2018	Y	3	2	11	16	21	0
PA	E806P	2018	1	25/01/2018	N	13	17	12	42	212	1244
PA	E806P	2018	1	25/01/2018	Y	3	2	5	10	12	0
PA	W807	2018	1	27/01/2018	Y	0	6	32	38	58	0
PA	W807	2018	1	27/01/2018	N	32	42	65	139	685	3239
PA	X806	2018	1	27/01/2018	N	16	20	26	62	370	1911
PA	X806	2018	1	27/01/2018	Y	1	0	5	6	6	0
PA	E807N	2018	1	28/01/2018	Y	1	2	23	26	31	0
PA	E807N	2018	1	28/01/2018	N	8	16	38	62	225	1209
PA	A805N	2018	1	29/01/2018	Y	0	1	8	9	10	0
PA	A805N	2018	1	29/01/2018	N	7	11	18	36	190	1259
PA	J805	2018	1	30/01/2018	N	5	13	13	31	219	1691
PA	J805	2018	1	30/01/2018	Y	0	2	9	11	12	0
PC	2635	2016	11	1/11/2016	N	0	0	0	0	1	125
PC	D621	2016	11	1/11/2016	N	4	3	6	13	91	1980
PC	D621	2016	11	1/11/2016	Y	0	0	2	2	2	0
PC	S620C	2016	11	4/11/2016	N	0	0	0	0	0	163
PC	S620E	2016	11	4/11/2016	N	0	0	0	0	0	103
PC	B633	2016	11	5/11/2016	N	0	0	0	0	1	6
PC	B633A	2016	11	5/11/2016	N	0	0	0	0	0	6
PC	R643	2016	11	5/11/2016	N	0	0	0	0	3	38
PC	1637	2016	11	6/11/2016	N	0	0	0	0	0	10
PC	1637A	2016	11	6/11/2016	N	0	0	0	0	0	17
PC	D622	2016	11	6/11/2016	N	0	1	5	6	24	1756

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	G637	2016	11	6/11/2016	N	0	0	0	0	0	18
PC	G637A	2016	11	6/11/2016	N	0	0	0	0	0	9
PC	6638	2016	11	8/11/2016	N	0	0	0	0	1	14
PC	E634A	2016	11	8/11/2016	N	0	1	0	1	3	343
PC	C620	2016	11	9/11/2016	N	1	0	4	5	46	1915
PC	K622	2016	11	9/11/2016	N	0	0	0	0	0	49
PC	9635	2016	11	10/11/2016	N	0	0	0	0	0	13
PC	5651	2016	11	11/11/2016	N	8	5	6	19	136	2191
PC	5651	2016	11	11/11/2016	Y	1	0	0	1	2	0
PC	M635	2016	11	12/11/2016	N	1	1	1	3	11	485
PC	R644	2016	11	12/11/2016	N	0	0	0	0	2	23
PC	A633	2016	11	13/11/2016	N	0	0	0	0	0	8
PC	E634B	2016	11	13/11/2016	N	1	1	2	4	20	347
PC	G638	2016	11	13/11/2016	N	0	0	0	0	0	8
PC	G638A	2016	11	13/11/2016	N	0	0	0	0	0	5
PC	5652	2016	11	14/11/2016	Y	0	0	1	1	1	0
PC	5652	2016	11	14/11/2016	N	3	2	3	8	106	2464
PC	E635	2016	11	15/11/2016	Y	0	1	1	2	2	0
PC	E635	2016	11	15/11/2016	N	7	6	1	14	57	2296
PC	1638	2016	11	16/11/2016	N	0	0	1	1	1	14
PC	1638A	2016	11	16/11/2016	N	0	0	0	0	0	8
PC	2636	2016	11	16/11/2016	N	0	0	0	0	0	12
PC	S621	2016	11	16/11/2016	N	0	0	1	1	14	1537
PC	S621A	2016	11	16/11/2016	N	0	0	0	0	0	44
PC	3648	2016	11	17/11/2016	N	0	0	0	0	0	4
PC	6639	2016	11	18/11/2016	N	0	0	0	0	1	10
PC	S621B	2016	11	18/11/2016	N	0	1	0	1	4	233
PC	B635	2016	11	19/11/2016	N	0	0	0	0	0	2
PC	R645	2016	11	19/11/2016	N	0	0	0	0	0	18
PC	5653	2016	11	20/11/2016	Y	0	0	1	1	3	0

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	5653	2016	11	20/11/2016	N	3	7	10	20	101	2514
PC	9636	2016	11	20/11/2016	N	0	0	0	0	1	16
PC	C621	2016	11	20/11/2016	Y	1	0	2	3	5	0
PC	C621	2016	11	20/11/2016	N	6	15	10	31	127	1879
PC	D623	2016	11	20/11/2016	Y	1	1	1	3	4	0
PC	D623	2016	11	20/11/2016	N	8	10	18	36	115	1874
PC	G639	2016	11	20/11/2016	N	0	0	0	0	0	24
PC	G639A	2016	11	20/11/2016	N	0	0	0	0	0	4
PC	K623	2016	11	21/11/2016	N	0	0	0	0	1	11
PC	K623A	2016	11	21/11/2016	N	0	0	0	0	0	16
PC	3649	2016	11	22/11/2016	N	0	0	1	1	1	9
PC	3649A	2016	11	22/11/2016	N	0	0	0	0	0	2
PC	A634	2016	11	23/11/2016	N	0	0	0	0	0	8
PC	1639	2016	11	26/11/2016	N	0	1	0	1	1	7
PC	1639A	2016	11	26/11/2016	N	0	0	0	0	0	6
PC	D624	2016	11	26/11/2016	N	5	8	5	18	37	1708
PC	R646	2016	11	26/11/2016	N	1	2	0	3	8	66
PC	3650	2016	11	27/11/2016	N	0	0	0	0	0	4
PC	B636	2016	11	27/11/2016	N	0	0	0	0	0	2
PC	C622	2016	11	27/11/2016	N	8	18	10	36	105	1959
PC	G640A	2016	11	27/11/2016	N	0	0	1	1	2	7
PC	6640	2016	11	28/11/2016	N	0	0	0	0	2	6
PC	E636	2016	11	28/11/2016	N	13	14	24	51	144	2728
PC	E636	2016	11	28/11/2016	Y	2	0	0	2	2	0
PC	M636	2016	11	29/11/2016	N	9	11	8	28	87	1092
PC	M636	2016	11	29/11/2016	Y	1	0	1	2	2	0
PC	M636A	2016	11	29/11/2016	N	0	1	1	2	13	281
PC	1640	2016	11	30/11/2016	N	0	1	0	1	1	15
PC	1640A	2016	11	30/11/2016	N	0	0	0	0	0	2
PC	3651	2016	12	1/12/2016	N	0	0	0	0	1	2

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	B637A	2016	12	3/12/2016	N	0	0	0	0	0	2
PC	K624	2016	12	3/12/2016	N	0	2	0	2	4	20
PC	R647	2016	12	3/12/2016	N	1	0	1	2	8	28
PC	S622N	2016	12	3/12/2016	Y	1	0	2	3	5	0
PC	S622N	2016	12	3/12/2016	N	8	7	10	25	140	2021
PC	3652	2016	12	4/12/2016	N	1	0	1	2	7	76
PC	3652A	2016	12	4/12/2016	Y	0	1	0	1	3	0
PC	3652A	2016	12	4/12/2016	N	0	0	0	0	7	112
PC	5654	2016	12	4/12/2016	N	16	10	11	37	135	2181
PC	5654	2016	12	4/12/2016	Y	0	0	3	3	5	0
PC	5654A	2016	12	4/12/2016	N	7	2	3	12	40	285
PC	G641	2016	12	4/12/2016	N	1	0	0	1	11	33
PC	G641A	2016	12	4/12/2016	Y	0	1	0	1	2	0
PC	G641A	2016	12	4/12/2016	N	3	1	2	6	8	18
PC	2637	2016	12	5/12/2016	Y	0	1	0	1	2	0
PC	2637	2016	12	5/12/2016	N	1	1	1	3	4	57
PC	9637	2016	12	5/12/2016	N	1	3	0	4	11	19
PC	S622A	2016	12	5/12/2016	N	0	0	1	1	3	380
PC	S622P	2016	12	5/12/2016	N	4	1	1	6	45	1533
PC	5654B	2016	12	8/12/2016	N	2	6	2	10	25	278
PC	6641	2016	12	8/12/2016	N	0	0	0	0	0	5
PC	D625	2016	12	9/12/2016	N	20	17	12	49	234	1742
PC	D625	2016	12	9/12/2016	Y	1	2	1	4	6	0
PC	M637	2016	12	9/12/2016	N	0	0	0	0	5	36
PC	M637	2016	12	9/12/2016	Y	0	1	0	1	2	0
PC	1641	2016	12	10/12/2016	N	0	0	0	0	0	10
PC	R648	2016	12	10/12/2016	N	0	0	1	1	8	15
PC	S622B	2016	12	10/12/2016	N	3	2	1	6	21	378
PC	S622B	2016	12	10/12/2016	Y	0	0	1	1	2	0
PC	B638	2016	12	11/12/2016	N	0	0	0	0	1	1

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	C623	2016	12	11/12/2016	Y	5	3	4	12	18	0
PC	C623	2016	12	11/12/2016	N	43	23	14	80	381	1750
PC	G642	2016	12	11/12/2016	N	0	0	0	0	0	6
PC	E637	2016	12	12/12/2016	Y	3	3	5	11	17	0
PC	E637	2016	12	12/12/2016	N	31	27	28	86	407	2769
PC	M638	2016	12	12/12/2016	N	2	1	0	3	17	72
PC	M638A	2016	12	12/12/2016	Y	0	0	1	1	3	0
PC	M638A	2016	12	12/12/2016	N	3	1	6	10	38	214
PC	M639	2016	12	16/12/2016	N	13	17	13	43	189	820
PC	M639	2016	12	16/12/2016	Y	3	3	5	11	15	0
PC	M639A	2016	12	16/12/2016	Y	1	0	1	2	2	0
PC	M639A	2016	12	16/12/2016	N	0	4	2	6	29	158
PC	5655	2016	12	17/12/2016	N	26	19	14	59	271	2099
PC	5655	2016	12	17/12/2016	Y	1	4	0	5	6	0
PC	B639	2016	12	17/12/2016	N	0	0	0	0	0	8
PC	B639A	2016	12	17/12/2016	N	0	0	0	0	0	11
PC	B639A	2016	12	17/12/2016	Y	0	1	1	2	3	0
PC	R649	2016	12	17/12/2016	N	0	3	0	3	3	16
PC	6642	2016	12	18/12/2016	N	0	0	0	0	0	5
PC	C624	2016	12	18/12/2016	N	26	27	14	67	259	1809
PC	C624	2016	12	18/12/2016	Y	2	0	0	2	2	0
PC	G643	2016	12	18/12/2016	N	0	0	0	0	0	2
PC	G643A	2016	12	18/12/2016	N	0	0	0	0	0	7
PC	S623	2016	12	18/12/2016	Y	3	4	1	8	16	0
PC	S623	2016	12	18/12/2016	N	19	13	15	47	300	1901
PC	E701	2016	12	19/12/2016	N	22	21	23	66	298	2539
PC	E701	2016	12	19/12/2016	Y	2	0	3	5	8	0
PC	1642	2016	12	20/12/2016	N	0	0	1	1	1	31
PC	1642A	2016	12	20/12/2016	N	1	0	0	1	1	5
PC	2701	2016	12	20/12/2016	N	0	0	1	1	7	54

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	9701	2016	12	20/12/2016	N	2	0	1	3	9	25
PC	K701	2016	12	20/12/2016	N	0	0	0	0	0	11
PC	3701	2016	12	21/12/2016	N	1	0	0	1	6	51
PC	3701A	2016	12	21/12/2016	N	0	0	0	0	0	11
PC	5655A	2016	12	21/12/2016	N	3	4	0	7	38	268
PC	S701	2016	12	21/12/2016	Y	1	3	0	4	6	0
PC	S701	2016	12	21/12/2016	N	15	20	18	53	280	1851
PC	A636	2016	12	22/12/2016	N	1	0	1	2	3	8
PC	D701	2016	12	22/12/2016	Y	2	6	2	10	13	0
PC	D701	2016	12	22/12/2016	N	20	29	15	64	256	1821
PC	R650	2016	12	22/12/2016	Y	0	1	1	2	2	0
PC	R650	2016	12	22/12/2016	N	0	0	0	0	1	12
PC	B640	2016	12	23/12/2016	N	1	0	0	1	6	23
PC	B640A	2016	12	23/12/2016	N	0	0	0	0	2	17
PC	M701	2016	12	27/12/2016	N	15	13	5	33	145	765
PC	M701	2016	12	27/12/2016	Y	2	4	4	10	19	0
PC	M701A	2016	12	27/12/2016	N	4	2	1	7	19	165
PC	M701A	2016	12	27/12/2016	Y	0	1	0	1	2	0
PC	6701	2016	12	28/12/2016	N	0	0	0	0	0	11
PC	C701	2016	12	28/12/2016	N	38	27	29	94	309	1772
PC	C701	2016	12	28/12/2016	Y	11	3	4	18	30	0
PC	G701	2016	12	29/12/2016	N	0	2	1	3	16	56
PC	1701	2016	12	30/12/2016	N	0	0	0	0	1	8
PC	1701A	2016	12	30/12/2016	N	0	0	0	0	1	4
PC	5701	2016	12	30/12/2016	Y	1	5	3	9	14	0
PC	5701	2016	12	30/12/2016	N	18	23	15	56	285	2175
PC	A701	2016	12	30/12/2016	N	0	0	0	0	2	10
PC	B701	2016	12	30/12/2016	N	0	0	0	0	0	9
PC	B701A	2016	12	30/12/2016	N	0	1	0	1	5	24
PC	R701	2016	12	30/12/2016	N	1	1	0	2	9	27

6743 7110 8230 98282 479256

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	3701B	2016	12	31/12/2016	N	0	0	0	0	0	4
PC	E702	2017	1	2/01/2017	Y	0	3	3	6	10	0
PC	E702	2017	1	2/01/2017	N	47	47	34	128	547	2766
PC	5701A	2017	1	3/01/2017	Y	1	0	0	1	1	0
PC	5701A	2017	1	3/01/2017	N	2	1	1	4	20	221
PC	D702	2017	1	3/01/2017	Y	2	4	0	6	10	0
PC	D702	2017	1	3/01/2017	N	14	14	19	47	226	1370
PC	D702A	2017	1	3/01/2017	Y	1	0	0	1	3	0
PC	D702A	2017	1	3/01/2017	N	4	2	3	9	38	243
PC	K702	2017	1	3/01/2017	N	0	0	0	0	0	14
PC	2702	2017	1	4/01/2017	N	1	0	0	1	5	57
PC	3702	2017	1	4/01/2017	N	2	4	0	6	12	71
PC	9702	2017	1	4/01/2017	Y	0	1	1	2	6	0
PC	9702	2017	1	4/01/2017	N	0	0	0	0	2	8
PC	S702	2017	1	5/01/2017	Y	5	6	5	16	29	0
PC	S702	2017	1	5/01/2017	N	24	20	25	69	339	1837
PC	B702	2017	1	6/01/2017	N	0	0	0	0	0	6
PC	3702A	2017	1	7/01/2017	N	0	0	0	0	0	4
PC	6702	2017	1	7/01/2017	Y	1	0	1	2	2	0
PC	6702	2017	1	7/01/2017	N	0	1	0	1	1	11
PC	R702	2017	1	7/01/2017	N	0	0	0	0	11	45
PC	C702	2017	1	8/01/2017	N	13	12	13	38	215	1411
PC	C702	2017	1	8/01/2017	Y	6	4	6	16	22	0
PC	C702A	2017	1	8/01/2017	N	0	0	0	0	0	390
PC	G702A	2017	1	8/01/2017	N	0	1	0	1	9	36
PC	G702N	2017	1	8/01/2017	N	1	0	0	1	1	14
PC	M702	2017	1	8/01/2017	N	20	23	5	48	226	793
PC	M702	2017	1	8/01/2017	Y	3	1	3	7	11	0
PC	M702A	2017	1	8/01/2017	N	2	1	1	4	21	150
PC	S703	2017	1	8/01/2017	N	15	17	12	44	239	1797

6743 7110 8230 98282 479256

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	S703	2017	1	8/01/2017	Y	2	2	4	8	9	0
PC	1702	2017	1	9/01/2017	N	0	1	0	1	2	40
PC	1702	2017	1	9/01/2017	Y	1	0	0	1	2	0
PC	A702	2017	1	9/01/2017	N	0	0	0	0	1	8
PC	E703	2017	1	10/01/2017	N	51	45	29	125	598	2467
PC	E703	2017	1	10/01/2017	Y	7	7	4	18	28	0
PC	C703A	2017	1	11/01/2017	N	0	0	0	0	2	830
PC	C703B	2017	1	11/01/2017	Y	0	1	1	2	4	0
PC	C703B	2017	1	11/01/2017	N	3	9	3	15	47	327
PC	C703D	2017	1	11/01/2017	N	0	0	0	0	0	238
PC	C703F	2017	1	11/01/2017	N	0	0	0	0	1	80
PC	5702	2017	1	12/01/2017	N	35	24	18	77	467	2357
PC	5702	2017	1	12/01/2017	Y	5	9	5	19	30	0
PC	D702B	2017	1	12/01/2017	N	3	5	5	13	56	322
PC	D702B	2017	1	12/01/2017	Y	1	1	5	7	11	0
PC	B703A	2017	1	14/01/2017	N	0	0	0	0	0	2
PC	C703C	2017	1	15/01/2017	N	0	0	0	0	2	340
PC	G702B	2017	1	15/01/2017	N	0	0	0	0	0	5
PC	G702P	2017	1	15/01/2017	N	0	0	1	1	4	15
PC	D703	2017	1	16/01/2017	N	23	18	19	60	220	1251
PC	D703	2017	1	16/01/2017	Y	4	1	4	9	13	0
PC	6703	2017	1	17/01/2017	N	0	0	0	0	0	6
PC	M703	2017	1	17/01/2017	Y	0	0	1	1	3	0
PC	M703	2017	1	17/01/2017	N	4	5	6	15	89	405
PC	M703A	2017	1	17/01/2017	N	0	0	1	1	1	94
PC	R703	2017	1	17/01/2017	N	0	0	0	0	0	6
PC	3703	2017	1	18/01/2017	N	0	0	0	0	3	85
PC	5703	2017	1	18/01/2017	Y	1	1	5	7	13	0
PC	5703	2017	1	18/01/2017	N	23	19	17	59	252	1975
PC	5703A	2017	1	18/01/2017	N	2	3	5	10	34	172

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	1703	2017	1	19/01/2017	N	0	0	0	0	2	12
PC	2703	2017	1	19/01/2017	N	0	0	0	0	0	14
PC	9703	2017	1	19/01/2017	N	0	0	0	0	3	8
PC	K703	2017	1	20/01/2017	N	0	0	0	0	0	6
PC	K703A	2017	1	20/01/2017	N	0	0	0	0	0	2
PC	E704	2017	1	21/01/2017	N	26	28	33	87	472	2750
PC	E704	2017	1	21/01/2017	Y	7	9	29	45	60	0
PC	R704	2017	1	21/01/2017	N	2	5	0	7	15	38
PC	G703A	2017	1	22/01/2017	N	0	0	0	0	0	17
PC	S704	2017	1	22/01/2017	Y	0	3	0	3	7	0
PC	S704	2017	1	22/01/2017	N	6	6	9	21	80	1909
PC	9704	2017	1	23/01/2017	N	0	0	0	0	0	2
PC	A703	2017	1	24/01/2017	N	0	0	0	0	2	14
PC	D703A	2017	1	25/01/2017	N	8	7	4	19	60	335
PC	D703A	2017	1	25/01/2017	Y	0	1	1	2	3	0
PC	5703B	2017	1	27/01/2017	N	2	2	3	7	27	424
PC	M704	2017	1	27/01/2017	N	0	1	0	1	5	73
PC	M704A	2017	1	27/01/2017	N	0	1	0	1	3	58
PC	R705	2017	1	28/01/2017	N	0	0	0	0	0	8
PC	1704	2017	1	29/01/2017	N	0	0	0	0	0	9
PC	1704A	2017	1	29/01/2017	N	0	0	0	0	0	2
PC	D704	2017	1	29/01/2017	N	3	1	9	13	49	1624
PC	G704	2017	1	29/01/2017	N	0	0	0	0	0	5
PC	G704A	2017	1	29/01/2017	N	0	0	0	0	0	6
PC	5704	2017	1	31/01/2017	Y	0	2	1	3	5	0
PC	5704	2017	1	31/01/2017	N	1	3	8	12	36	2093
PC	5723	2017	11	1/11/2017	N	4	3	4	11	73	2261
PC	S727C	2017	11	3/11/2017	N	0	0	0	0	0	205
PC	R747	2017	11	4/11/2017	N	0	0	0	0	10	39
PC	1735	2017	11	5/11/2017	N	0	0	0	0	0	26

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	1735A	2017	11	5/11/2017	N	0	0	0	0	0	15
PC	E737	2017	11	5/11/2017	N	0	0	0	0	0	23
PC	G734	2017	11	5/11/2017	N	0	0	0	0	0	10
PC	S728	2017	11	5/11/2017	N	6	3	7	16	68	1841
PC	C716	2017	11	6/11/2017	Y	0	0	1	1	2	0
PC	C716	2017	11	6/11/2017	N	3	2	4	9	49	1594
PC	3729	2017	11	8/11/2017	N	0	0	0	0	0	8
PC	9737N	2017	11	9/11/2017	N	0	0	0	0	0	4
PC	B732	2017	11	10/11/2017	N	0	0	0	0	0	13
PC	M742	2017	11	10/11/2017	N	1	0	0	1	2	406
PC	2735	2017	11	11/11/2017	N	0	0	0	0	0	55
PC	6738	2017	11	11/11/2017	N	0	0	0	0	0	11
PC	K723	2017	11	11/11/2017	N	0	0	0	0	0	32
PC	R748	2017	11	11/11/2017	N	0	0	0	0	0	13
PC	S729	2017	11	11/11/2017	N	0	0	0	0	14	1776
PC	E738	2017	11	12/11/2017	N	0	0	0	0	1	4
PC	3730	2017	11	13/11/2017	N	0	0	0	0	0	4
PC	A731	2017	11	13/11/2017	N	0	0	0	0	0	6
PC	H779	2017	11	13/11/2017	N	0	0	0	0	8	360
PC	9738N	2017	11	14/11/2017	N	0	0	1	1	2	6
PC	1736	2017	11	15/11/2017	N	0	0	0	0	0	33
PC	5724	2017	11	15/11/2017	N	0	2	2	4	31	1812
PC	E739	2017	11	17/11/2017	N	0	0	0	0	0	3
PC	C717	2017	11	18/11/2017	N	0	2	1	3	18	1841
PC	G736	2017	11	19/11/2017	N	0	0	0	0	0	6
PC	G736A	2017	11	19/11/2017	N	0	0	0	0	0	6
PC	M743	2017	11	19/11/2017	N	0	6	4	10	33	2063
PC	B733	2017	11	20/11/2017	N	0	0	0	0	0	4
PC	6739	2017	11	21/11/2017	N	0	0	0	0	1	52
PC	K724	2017	11	23/11/2017	N	0	2	1	3	4	15

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	K724	2017	11	23/11/2017	Y	2	0	0	2	2	0
PC	K724A	2017	11	23/11/2017	N	0	0	0	0	0	4
PC	1737	2017	11	25/11/2017	N	0	0	0	0	0	4
PC	E741	2017	11	26/11/2017	N	0	1	1	2	3	11
PC	G737	2017	11	26/11/2017	N	0	0	0	0	0	1
PC	G737A	2017	11	26/11/2017	N	0	0	0	0	0	15
PC	S730	2017	11	26/11/2017	N	1	5	1	7	25	1481
PC	H780	2017	11	27/11/2017	N	2	1	3	6	14	182
PC	H780A	2017	11	27/11/2017	N	2	0	0	2	19	747
PC	H780A	2017	11	27/11/2017	Y	1	0	1	2	3	0
PC	5725	2017	11	28/11/2017	N	11	20	17	48	215	2559
PC	A732	2017	11	28/11/2017	N	1	0	0	1	2	3
PC	9739N	2017	11	29/11/2017	N	0	0	0	0	0	4
PC	R751	2017	11	29/11/2017	N	0	1	0	1	2	18
PC	1738	2017	11	30/11/2017	N	0	0	0	0	2	21
PC	B734	2017	11	30/11/2017	N	0	0	0	0	0	1
PC	3733	2017	12	1/12/2017	N	0	0	0	0	1	1
PC	5726	2017	12	1/12/2017	N	17	19	20	56	174	2527
PC	H781	2017	12	2/12/2017	Y	1	0	1	2	2	0
PC	H781	2017	12	2/12/2017	N	1	6	3	10	26	425
PC	H781A	2017	12	2/12/2017	N	1	3	1	5	14	209
PC	C718	2017	12	3/12/2017	N	10	18	14	42	157	1837
PC	E742	2017	12	3/12/2017	N	1	0	2	3	4	47
PC	E742A	2017	12	3/12/2017	N	0	0	0	0	6	79
PC	G738	2017	12	3/12/2017	N	0	0	0	0	0	8
PC	G738A	2017	12	3/12/2017	N	0	0	0	0	0	8
PC	K725	2017	12	5/12/2017	N	0	1	0	1	2	9
PC	2737	2017	12	6/12/2017	N	0	1	0	1	2	19
PC	6740	2017	12	6/12/2017	N	0	2	1	3	5	31
PC	A733	2017	12	8/12/2017	N	0	0	0	0	0	2

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	3734	2017	12	9/12/2017	N	0	0	0	0	0	2
PC	R752	2017	12	9/12/2017	N	2	1	2	5	20	47
PC	S731	2017	12	9/12/2017	Y	0	1	0	1	1	0
PC	S731	2017	12	9/12/2017	N	23	18	16	57	202	1584
PC	1739	2017	12	10/12/2017	N	0	0	0	0	0	7
PC	B735	2017	12	10/12/2017	N	0	0	1	1	3	3
PC	M744	2017	12	11/12/2017	N	25	20	19	64	263	2191
PC	M744	2017	12	11/12/2017	Y	1	0	0	1	1	0
PC	H782	2017	12	12/12/2017	N	0	0	0	0	4	28
PC	5727	2017	12	15/12/2017	N	28	25	16	69	341	2466
PC	5727	2017	12	15/12/2017	Y	2	1	0	3	8	0
PC	H783	2017	12	15/12/2017	N	0	1	0	1	14	69
PC	H783A	2017	12	15/12/2017	N	6	1	4	11	55	447
PC	9741	2017	12	16/12/2017	N	0	0	0	0	0	1
PC	R753	2017	12	16/12/2017	N	0	1	2	3	4	13
PC	3735	2017	12	17/12/2017	N	0	0	1	1	2	3
PC	C719	2017	12	17/12/2017	Y	4	1	2	7	11	0
PC	C719	2017	12	17/12/2017	N	27	33	24	84	415	1732
PC	G740	2017	12	17/12/2017	N	0	0	0	0	2	8
PC	G740A	2017	12	17/12/2017	N	0	0	0	0	0	8
PC	A801	2017	12	18/12/2017	N	1	1	0	2	4	31
PC	9801	2017	12	19/12/2017	N	0	0	1	1	3	27
PC	9801	2017	12	19/12/2017	Y	0	1	0	1	4	0
PC	H784	2017	12	19/12/2017	N	9	9	2	20	76	468
PC	H784	2017	12	19/12/2017	Y	0	0	2	2	2	0
PC	H784A	2017	12	19/12/2017	N	3	0	2	5	24	154
PC	M745	2017	12	19/12/2017	Y	3	0	1	4	4	0
PC	M745	2017	12	19/12/2017	N	16	16	12	44	193	1212
PC	1740	2017	12	20/12/2017	N	0	0	0	0	2	8
PC	B801	2017	12	20/12/2017	N	0	0	0	0	1	37

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	E801	2017	12	20/12/2017	Y	0	0	1	1	2	0
PC	E801	2017	12	20/12/2017	N	0	2	1	3	4	84
PC	2801	2017	12	21/12/2017	N	0	0	0	0	0	27
PC	5801	2017	12	21/12/2017	N	16	24	19	59	283	2307
PC	6801	2017	12	21/12/2017	N	3	0	4	7	14	88
PC	C801	2017	12	21/12/2017	N	15	20	16	51	209	1841
PC	3736	2017	12	22/12/2017	Y	0	1	1	2	2	0
PC	3736	2017	12	22/12/2017	N	0	0	0	0	0	2
PC	K801	2017	12	22/12/2017	N	0	0	0	0	0	13
PC	S801	2017	12	22/12/2017	Y	1	2	0	3	7	0
PC	S801	2017	12	22/12/2017	N	24	17	26	67	221	1811
PC	R754	2017	12	23/12/2017	N	1	1	1	3	6	26
PC	G801	2017	12	28/12/2017	N	1	0	0	1	5	12
PC	1801	2017	12	30/12/2017	N	0	0	1	1	2	14
PC	1801A	2017	12	30/12/2017	N	0	0	0	0	5	9
PC	3801	2017	12	30/12/2017	N	0	0	0	0	0	2
PC	H801	2017	12	30/12/2017	Y	0	0	2	2	5	0
PC	H801	2017	12	30/12/2017	N	10	14	8	32	135	797
PC	H801A	2017	12	30/12/2017	N	2	1	4	7	21	126
PC	M801	2017	12	30/12/2017	N	22	17	20	59	299	1424
PC	M801	2017	12	30/12/2017	Y	0	1	0	1	2	0
PC	R801	2017	12	30/12/2017	N	1	2	3	6	8	21
PC	A802	2018	1	2/01/2018	N	0	1	1	2	5	35
PC	5802	2018	1	3/01/2018	Y	2	2	0	4	11	0
PC	5802	2018	1	3/01/2018	N	18	21	19	58	288	1546
PC	5802A	2018	1	3/01/2018	N	6	6	2	14	65	763
PC	5802A	2018	1	3/01/2018	Y	1	0	0	1	1	0
PC	9802	2018	1	3/01/2018	N	0	1	0	1	4	46
PC	B802	2018	1	3/01/2018	N	0	0	0	0	9	35
PC	E802	2018	1	3/01/2018	N	1	0	0	1	13	126

6743 7110 8230 98282 479256

6743 7110 8230 98282 479256

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	E802	2018	1	3/01/2018	Y	0	1	0	1	2	0
PC	C802	2018	1	4/01/2018	N	1	0	0	1	2	13
PC	C802N	2018	1	4/01/2018	N	19	21	20	60	317	1857
PC	C802N	2018	1	4/01/2018	Y	1	2	0	3	4	0
PC	S802	2018	1	4/01/2018	Y	3	5	15	23	33	0
PC	S802	2018	1	4/01/2018	N	37	57	25	119	475	2754
PC	S802A	2018	1	4/01/2018	Y	0	1	0	1	2	0
PC	S802A	2018	1	4/01/2018	N	6	4	4	14	55	385
PC	6802	2018	1	5/01/2018	N	2	2	1	5	12	78
PC	K802	2018	1	5/01/2018	N	0	0	1	1	2	86
PC	R802	2018	1	6/01/2018	Y	2	1	1	4	6	0
PC	R802	2018	1	6/01/2018	N	0	2	2	4	12	33
PC	3802	2018	1	7/01/2018	N	0	0	0	0	0	4
PC	G802	2018	1	7/01/2018	N	0	0	1	1	1	4
PC	G802A	2018	1	7/01/2018	N	1	0	0	1	7	23
PC	5802B	2018	1	8/01/2018	N	4	1	1	6	22	815
PC	1802	2018	1	9/01/2018	N	0	0	0	0	3	27
PC	2802	2018	1	9/01/2018	N	0	0	0	0	1	18
PC	H802	2018	1	9/01/2018	N	23	13	7	43	226	1010
PC	H802	2018	1	9/01/2018	Y	5	0	4	9	9	0
PC	H802A	2018	1	9/01/2018	Y	0	0	2	2	4	0
PC	H802A	2018	1	9/01/2018	N	4	4	1	9	44	326
PC	5803	2018	1	10/01/2018	N	25	22	16	63	277	1556
PC	5803	2018	1	10/01/2018	Y	1	1	3	5	7	0
PC	M802	2018	1	11/01/2018	N	44	38	24	106	403	1944
PC	M802	2018	1	11/01/2018	Y	2	4	6	12	16	0
PC	3803	2018	1	12/01/2018	N	0	0	0	0	1	2
PC	A803	2018	1	12/01/2018	N	0	0	0	0	1	4
PC	B803	2018	1	13/01/2018	N	0	0	1	1	2	53
PC	R803	2018	1	13/01/2018	N	0	2	0	2	7	25

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	R803	2018	1	13/01/2018	Y	0	1	1	2	4	0
PC	S802B	2018	1	13/01/2018	N	6	5	3	14	59	512
PC	S802C	2018	1	13/01/2018	N	1	0	2	3	10	86
PC	G803	2018	1	14/01/2018	N	0	0	1	1	5	12
PC	G803A	2018	1	14/01/2018	N	0	0	0	0	0	4
PC	E803	2018	1	17/01/2018	N	0	0	0	0	1	92
PC	S803	2018	1	17/01/2018	N	24	29	13	66	230	2569
PC	S803	2018	1	17/01/2018	Y	2	1	0	3	3	0
PC	9803	2018	1	18/01/2018	N	0	0	1	1	2	47
PC	C803N	2018	1	18/01/2018	N	23	16	12	51	340	1826
PC	C803N	2018	1	18/01/2018	Y	3	6	4	13	17	0
PC	1803	2018	1	19/01/2018	N	0	0	0	0	2	17
PC	1803A	2018	1	19/01/2018	N	0	0	0	0	0	2
PC	3804	2018	1	20/01/2018	N	0	0	0	0	0	4
PC	6803	2018	1	20/01/2018	N	0	0	0	0	0	24
PC	H803	2018	1	20/01/2018	N	13	8	7	28	89	787
PC	H803	2018	1	20/01/2018	Y	2	0	1	3	5	0
PC	R804	2018	1	20/01/2018	N	0	0	0	0	4	24
PC	C804N	2018	1	21/01/2018	N	3	3	4	10	36	1979
PC	G804A	2018	1	21/01/2018	N	0	1	1	2	2	11
PC	A804	2018	1	22/01/2018	N	0	0	0	0	0	1
PC	K803	2018	1	22/01/2018	N	0	0	0	0	0	6
PC	K803A	2018	1	22/01/2018	N	0	0	0	0	0	11
PC	5804	2018	1	23/01/2018	Y	2	1	4	7	11	0
PC	5804	2018	1	23/01/2018	N	11	13	6	30	172	1678
PC	2803	2018	1	24/01/2018	N	0	0	0	0	0	50
PC	2803A	2018	1	24/01/2018	N	0	0	0	0	0	20
PC	H804	2018	1	24/01/2018	N	3	3	2	8	28	701
PC	H804	2018	1	24/01/2018	Y	0	0	1	1	2	0
PC	H804A	2018	1	24/01/2018	N	0	2	3	5	7	268

6743 7110 8230 98282 479256

Company Code	Cruise Code	Sail Year	Sail Month	Sail Date	Unaccompanied	Age 16	Age 17	Age 18	Total Age 16-18	Total Underage	Total Adult
PC	5804A	2018	1	25/01/2018	N	3	2	2	7	45	832
PC	C804	2018	1	25/01/2018	N	0	0	0	0	0	4
PC	M803	2018	1	25/01/2018	N	5	4	11	20	55	1417
PC	S803A	2018	1	26/01/2018	N	4	7	4	15	61	600
PC	B804	2018	1	27/01/2018	N	0	0	0	0	0	6
PC	R805	2018	1	27/01/2018	N	0	0	0	0	0	12
PC	G805	2018	1	28/01/2018	N	0	0	0	0	0	5
PC	G805A	2018	1	28/01/2018	N	0	0	0	0	0	6
PC	H805	2018	1	28/01/2018	N	0	0	2	2	5	766
PC	H805A	2018	1	28/01/2018	N	0	0	0	0	0	103
PC	1804A	2018	1	29/01/2018	N	0	0	0	0	0	3
PC	5805	2018	1	29/01/2018	N	2	3	7	12	46	2261
PC	5805	2018	1	29/01/2018	Y	0	0	2	2	2	0
PC	S804	2018	1	30/01/2018	Y	0	1	4	5	7	0
PC	S804	2018	1	30/01/2018	N	2	5	16	23	87	3512
PC	E804	2018	1	31/01/2018	N	0	0	0	0	0	34

6743 7110 8230 98282 479256

(1)

Home (1) > Cruise News (/news/) > Unauthorised Schoolies Cruises Offered on Two Australian Cruise Ships

Unauthorised Schoolies Cruises Offered on Two Australian Cruise Ships



(/newsletter/index.cfm?referral=news-icon)

February 16, 2018



(/photos/ships/majesty-of-the-

seas-76/pool-282380/pool--v12950717/)

(7 p.m. AEST) - Previously axed in Australia, schoolies cruises have been organised on two Royal Caribbean ships by a local travel agency. Sure Thing Travel is selling three cruises for high school-leavers, or "schoolies", with access to parties, events and "direct pricing for great deals on unlimited drinks packages".

But the party cruises may not be a sure thing, after all, as the cruise line has not approved the promotion. A Royal Caribbean spokesperson confirmed today that it is not offering schoolies cruises or charters in Australia.

Cruise Critic became aware of the schoolies cruises when a member warned others on our Australia & NZ Cruisers board (<http://boards.cruisecritic.com.au/forumdisplay.php?f=712>) about an upcoming sailing on Ovation of the Seas. **rkmw** posted: "The five-night 23rd November cruise to Hobart is being advertised as a schoolies cruise so if anyone is thinking of booking it, beware."

Cruise Critic member **megsie**, who is booked on the cruise, said: "As long as there is still a mixed age group onboard, we'll be happy but hopefully not overloaded with 16-18 year olds. As a family we've decided to wait a little while before deciding to cancel."

Schoolies cruises were once a rite of passage for Aussie students, with more than 1,500 school-leavers on each trip, according to a report in the Sydney Morning Herald in 2006. The popular cruises were run by P&O since the 1990s but the line discontinued them in 2007.

While P&O does not have an official 'schoolies ban', the line's website states "for cruises departing from an Australian port between 1 November and 7 January, any guest under 19 years of age on the day they board the cruise, must travel in the same room as a responsible adult 19 years or older".

P&O also limits the number of guests under 19 who can travel unaccompanied from 8 January to 31 January.

The three cruises marketed by Sure Thing include Ovation of the Seas' Sydney departure on 23 November 2018 and two 11-night cruises on Explorer of the Seas also departing Sydney on 16 and 29 November 2018.

A Royal Caribbean spokesperson told us the line is engaged in discussions with Sure Thing regarding the unauthorised theme cruises.

Cruise Critic contacted Sure Thing for comment but they had not responded at the time of writing.

According to an email sent to those who register, at least one passenger in each cabin must be aged 18 or older. The email from Sure Thing states: "A Letter of Permission must be filled by each guest who will be under 18 at time of travel (signed by a parent to authorise legal guardianship to the 18-year-old friend who is rooming with them for the cruise)."

--By Tiana Templeman, Cruise Critic contributor



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