

PORT NELSON ENVIRONMENTAL MANAGEMENT PLAN

1. Context

a. Content

Port Nelson Limited's (PNL's) Environmental Management System (EMS) takes a risk based approach to managing the environmental effects from activities that PNL are in direct control of, in the physical locations PNL operate out of.

b. Interested Parties

PNL have a long established relationship with our environmental stakeholders through the Port Nelson Environmental Consultative Committee (PNECC). The PNECC Meets 3-4 times per year. Members of this Committee include representatives from:

- Iwi
- Nelson City Council (NCC)
- Department of Conservation (DoC)
- Royal Forest and Bird (RF&B)
- Friends of Nelson Haven and Tasman Bay (FONH)
- Ministry for Primary Industries (MPI)
- Other industry, customers and research organisations with an interest in the environmental side of PNL's business.

Iwi are an important environmental stakeholder of PNL's. There are eight iwi within the rohe of Te Tau Ihu (Tangata whenua ki Whakatu), and some from outside this region who have customary title applications in the coastal marine area where PNL undertakes its activities. PNL endeavours to meet, inform and collaborate on environmental matters as needed, as well as seek their advice and views as part of resource consenting.

PNL engage regularly with its closest residential neighbours on matters related to Port business and noise through the Port Noise Liaison Committee (PNLC) which meets up to 4 time per year. PNL also meet with residents one on one to discuss and complete our acoustic treatment obligations as required.

To gain further insight into the environmental interests of its stakeholders, interested parties, and customers PNL undertakes periodic surveys, and seeks feedback in the forums mentioned above. The latest survey results can be found in the PNL Environmental Survey Results for 2018.

c. Scope

The scope of this EMS extends to the sites PNL undertake business activities which are in PNL's direct control.

Activity	Direct Control (in scope of EMS)	Limited Control (out of EMS scope)
Ship/Vessel Movement	<ul style="list-style-type: none"> • When under control of PNL pilots/tugs. • PNL's shipping movements in harbour channel. • Activities undertaken by PNL floating plant. • Activities undertaken by contractors contracted directly to PNL. 	<ul style="list-style-type: none"> • Vessel movements to and from non PNL berths, and Marina. • Vessel movements by Masters holding pilot exemptions. • Recreational users.
Ship at Berth	<ul style="list-style-type: none"> • Vessels at PNL commercial berths. 	<ul style="list-style-type: none"> • Vessels at non PNL berths and Marina. • Discharges to air from ships at berth.
Cargo Receipt, Storage & Delivery	<ul style="list-style-type: none"> • All cargo received, moved, stored, delivered by PNL. 	<ul style="list-style-type: none"> • Log marshalling undertaken by C3. • Loading and unloading of cargo undertaken by other agencies



	<ul style="list-style-type: none"> • Container packing and unpacking by PNL's QuayPack and QuayConnect. 	(such as C3, NZOSL, AICA, and SSA).
Ship Repair & Maintenance	<ul style="list-style-type: none"> • Operations at the Calwell Slipway • At PNL commercial berths. 	<ul style="list-style-type: none"> • Nelson Slipway. • Nelson Marina. • Works undertaken at PNL's leased and licensed berths.
Container devanning, washing and pre-tripping.	<ul style="list-style-type: none"> • Devanning undertaken at PNL's ATF's. • Inspection and washing undertaken in PNL's accredited quarantine and container wash facilities. • Reefer containers plugged into PNL's electricity supply. • Awareness of MPI's requirements for cargo export and receipt at the NZ border. 	<ul style="list-style-type: none"> • Container repair • Offsite pre tripping • Container unpacking not undertaken in PNL's accredited facilities. • Directives around cargo receipt and devan issued by MPI's border services or customs.
Capital and Maintenance dredging.	<ul style="list-style-type: none"> • Maintenance of depths in PNL's commercial berth pockets and entrance channel. 	<ul style="list-style-type: none"> • Dredging contracted by anyone other than PNL. • Marina dredging.
Fumigation	<ul style="list-style-type: none"> • Provision of licensed area within Port Secure Boundary for fumigation to occur. 	<ul style="list-style-type: none"> • Fumigation of cargo and timber undertaken by Genera, and in hold fumigation by Contractors. • Directive of cargo to be fumigated by MPI.
Maintenance & Repair of PNL sites, assets and infrastructure.	<ul style="list-style-type: none"> • PNL workshop activities. • Inspection, maintenance and repair of PNL infrastructure and assets. 	<ul style="list-style-type: none"> • Inspection and maintenance of lessee's and license holders sites, infrastructure, facilities, and assets, except where PNL are responsible as defined by lease.
Project works	<ul style="list-style-type: none"> • All PNL project works, and contractors to PNL for projects. 	<ul style="list-style-type: none"> • Project works on PNL sites that are not directly PNL's.
Contractor Management	<ul style="list-style-type: none"> • Contractors directly employed by PNL. 	<ul style="list-style-type: none"> • Subcontractors to PNL's contractors. • Other contractors working on PNL sites not under PNL's direct employment.
Warehousing and 3PL logistics provision.	<ul style="list-style-type: none"> • Movement and storage of cargo in and out of QuayConnect facilities by PNL. 	<ul style="list-style-type: none"> • Movement of cargo by CEL, and other transport companies.

2. Leadership

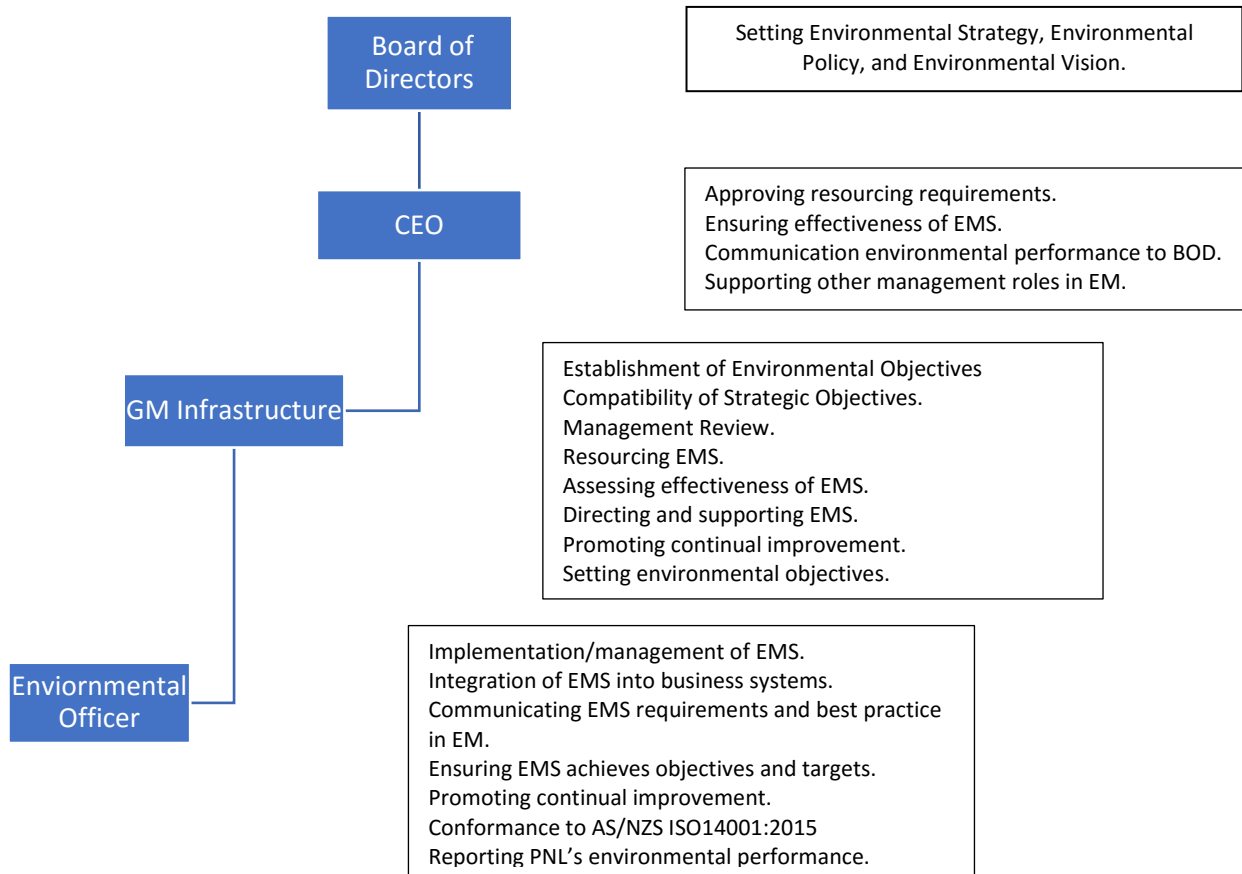
a. Environmental Policy

PNL will undertake present and future activities in an environmentally sustainable manner, whilst complying with applicable legislative requirements, and protecting the environment. PNL will strive for continual improvement in our environmental performance, and the prevention of pollution in all of our business undertakings.



b. Roles, Responsibilities, Authorities

This is PNL's organisational structure, and their roles as applied to the EMS.



3. Planning

a. Strategic Environmental Objectives

Objective 1 – To implement innovative best practice approaches to environmental management that achieve continual improvement in our environmental performance.

Objective 2 – To integrate sustainable environmental management into PNL activities, business processes and decisions.

Objective 3 – To raise the environmental awareness of PNL personnel and port users through education, training and ready access to necessary information.

Objective 4 – To manage our resource consumption and carbon emissions responsibly to reduce the PNL carbon footprint.



b. Environmental Performance Targets

PNL aims to meet the following environmental targets over the 5 years from the baseline year of FY2016.

Resource	Unit	Target
Fuel	Per RT	10% reduction
Electricity	Per TEU	10% reduction
Green house gas emissions	T CO2 equivalent	10% reduction
Percentage of waste recycled	Per T waste generated	10% improvement

c. Environmental Aspects

Environmental aspects from PNL's activities are assessed using the PNL Broad Brush Risk Assessment (BBRA) framework. This is a risk based approach to environmental aspect management. Environmental aspects with an inherent risk greater than 10 are considered significant environmental aspects and are actively managed through appropriate control mechanisms and applicable legislation. A list of PNL's environmental aspects can be found in PNLEMP Environmental Aspects (V4 May 18).

d. Compliance Obligations

i. Compliance Evaluation

A comprehensive list detailing all of the current resource consents held by PNL and their associated compliance obligations can be found in the PNL Resource Consent List (May 2018).

4. Support

a. Communication

PNL's Communication Plan specific to this EMS and environmental communication can be found in the PNL EMS Communication Plan 2018.

b. Documented Information

Documented information specific to the EMS sits within the EMS Master Folder within PNL's internal server. These documents are listed below and subject to regular review.

Document	Version Number
PNL Broad Brush Risk Assessment (BBRA)	V4 03.08.16
PNL Common User Protocols (CUP's)	V10 16 Dec 16
PNL Emergency Procedures Manual	18.01.18
PNLEMP Environmental Aspects	V4.0 May 2018
PNL EMS Communication Plan	V1 May 2018
PNL EMS Management Review Template	V2.0 Dec 2015
PNL Health & Safety Management Plan (HSMP)	19 Dec 2016
PNL Internal Audit Schedule	V4.0 May 2018
PNL Resource Consent List	May 2018
PNL Spill Response Plan	V3.0 Aug 16
PNL Survey Results 2018	V1 May 2018

The current version of the PNLEMP is available on PNL's website. Other relevant documented information to the EMS sits within the PNL QM and H&S Systems.

5. Operation

c. Operational Planning and Control

i. Establish

- Assessment of the environmental effects of new/changed activities
- Environmental advice on PNL projects
- Understanding strategic direction of business
- Environmental input into capital expenditure
- Scheduled review of environmental aspects
- Understanding projected shipping and cargo volumes
- Understanding appropriate control mechanisms (COP's)
- Understanding compliance obligations
- Establish meaningful environmental targets
- Understand best practice in environmental management within Port industry
- Understand sustainable business practice both within Port industry and wider industrial sector.

ii. Implement

- Foundation Footprint data entry/approval
- Reporting of near miss and incidents
- Provision of applicable information in inductions
- Monitoring/audit of high risk activities.

iii. Maintain

- Monitoring resource use
- Undertake audit and review in line with schedule
- Provide education and advice to PNL staff, contractors and site users
- Managing resource use in line with business growth and diversification

iv. Continual Improvement

- Annual audit Business Unit Managers
- Event reporting investigation/outcome
- Looking for innovative ways to reduce resource consumption
- Review EMS and EMS documented information
- EMS Management Review
- Education on environmental risk with PNL staff, Contractors and site users
- Report on environmental metrics in Annual Report.

d. Emergency Preparedness and Response

In order to be prepared to respond to emergency situations PNL maintains an Emergency Procedures Manual, and has an Emergency Response Team. PNL staff, and emergency services operate under these Emergency Response Procedures should those situations arise. PNL also has a Spill Response Plan, for non-emergency spill situations which does provide guidance on when to escalate a spill to an emergency response.

6. Performance Evaluation

e. Internal Audit Programme

To manage and assess its environmental performance, conformance to ASNZS ISO 14001:2015, and progress against environmental targets PNL maintains an internal environmental audit programme. Details of this can be found in the PNL Internal Environmental Audit Schedule.



f. Management Review

Annually top management reviews the EMS, and environmental performance using the PNL EMS Management Review Template.

7. Improvement

g. Incident Procedure

HSE Incidents at Port Nelson are reported through our Event Reporting System. The procedure for incident reporting is found in the PNL Health and Safety Management Plan (HSMP). An overview taken from the HSMP has been inserted below.



Incident Reporting Process

