

PORT NELSON

ENVIRONMENTAL MANAGEMENT PLAN



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DOCUMENT CONTROL

VERSION NUMBER	DATE	DETAILS OF CHANGES MADE	REVIEWED BY	APPROVED BY
V 2.3	Feb 2015	<i>Update to include management review, 2014/2015 EAP, current dates, change in EO.</i>	Kelly Leonard	Matt McDonald
V 3.0	Mar 2015	<i>Content review, COP'S into separate document, addition of document control, amend order.</i>	Kelly Leonard	Matt McDonald
V 3.1	Jan 2016	<i>Revised Environmental Policy, reviewed aspects/impacts. Reference to CUP, updated PNLC members, updated org chart, revised audit schedule, updated acoustic treatment list.</i>	Kelly Leonard	Matt McDonald
V3.2	Apr 2016	<i>Inclusion QuayPack operation in Blenheim, update audit schedule, addition of RM155421, update acoustic treatment of properties.</i>	Kelly Leonard	Matt McDonald
V3.3	May 2016	<i>Update scope, aspects/impacts, legislation.</i>	Kelly Leonard	Matt McDonald
V3.4	Nov 2016	<i>Inclusion PNL Spill Response Plan.</i>	Kelly Leonard	Matt McDonald
V3.5	Dec 2016	<i>Review Plan for currency, update as appropriate.</i>	Kelly Leonard	Matt McDonald
V3.6	Mar 2017	<i>Minor edits, update schedules.</i>	Kelly Leonard	Matt McDonald
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V4.0	May 2018	<i>Minor edits, schedule updates</i>	Kelly Leonard	Allanagh Rivers
V4.1	Nov 2018	<i>Minor edits, schedule updates</i>	Kelly Leonard	Allanagh Rivers
V5.1	Dec 2019	<i>Minor changes to structure and framework</i>	Kelly Leonard	Allanagh Rivers
V6.0	Apr 2020	<i>Major changes to structure and framework</i>	Allanagh Rivers	Allanagh Rivers

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INTRODUCTION

Port Nelson Limited (PNL) is the marine gateway for the Nelson-Tasman region and the wider Nelson-Tasman- Marlborough region, a vital hub for economic activity and a key stakeholder in our region's growth and prosperity.

Our goal is to:

Undertake present and future activities in a manner that minimises the Port's environmental impact, whilst complying with applicable legislative requirements and striving for continual improvement in environmental performance.

1.1 Context

Our Environmental management system (EMS) takes a risk-based approach to managing environmental effects from internal and external activities which it has direct control over, in those locations it operates.

1.2 Scope

Port Nelson is a diverse operation with a variety of operational activities, which are undertaken across multiple sites. The table below defines those internal and external activities PNL has direct control over.

Table 1. PNL Business Activities

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 master's 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 Reveal, Storage & Delivery	<ul style="list-style-type: none">• All cargo received, moved, stored, delivered by PNL.• Container packing and unpacking by PNL's QuayPack and QuayConnect.	<ul style="list-style-type: none">• Log marshalling undertaken by C3.• Loading and unloading of cargo undertaken by other agencies (such as C3, NZOSL, AICA, and SSA).
Ship Repair & Maintenance	<ul style="list-style-type: none">• Operations at the Calwell Slipway	<ul style="list-style-type: none">• Nelson Slipway.• Nelson Marina.

	<ul style="list-style-type: none"> At PNL commercial berths. 	<ul style="list-style-type: none"> 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 holder 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.

1.3 Interested Parties

PNL have a long-established relationship with our environmental stakeholders, which include:

- Iwi
- Nelson City Council (NCC)
- Department of Conservation (DoC)
- Royal Forest and Bird (RF&B)
- Ministry of Primary industries (MPI)
- Other industry, customers, and research organisations with an interest in the environmental side of PNL’s business

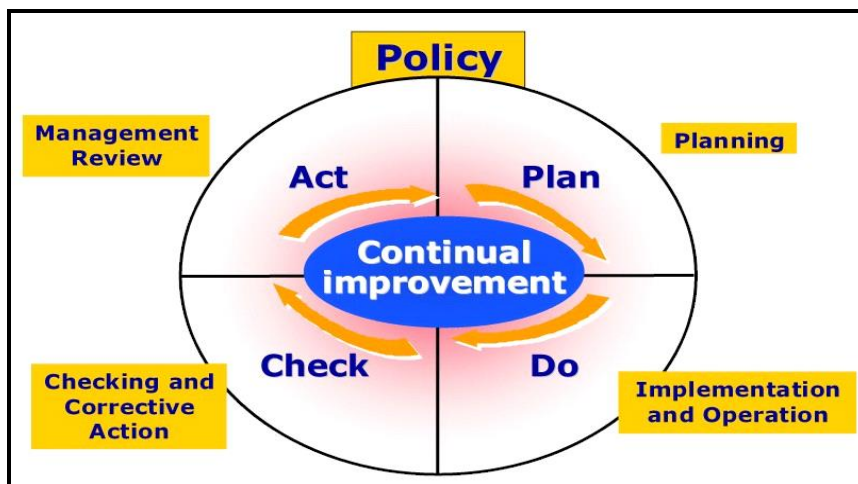
Port Nelson has well established committees, which manages these relationships through multiple forums these include:

- The Port Nelson Environmental Consultative Committee (PNECC) is an established committee, which meets and acts as a forum for PNL to share with these stakeholders what we are doing within the environmental space. This group meets up to 4 times per year.
- The Port Nelson Noise Liaison Committee (PNLC) is an established committee that engages regularly with its closet neighbours on matters relating to PNL business and noise. And to consider noise issues arising from the port operations. The group meets no less than 4 times per year. One on one meetings with residents occurs to discuss and complete our acoustic treatment obligations as required.
- Iwi are an important environmental stakeholder. PNL endeavours to meet, inform and collaborate on environmental matters, seek their advice and views as part of resource consenting.
- To gain further insight into environmental interests of its stakeholders, interested parties, and customers, PNL undertakes periodic surveys, and seeks feedback in the forums mentioned above.

1.4 Environmental Management System

PNL is committed to managing, growing, and continually improving its Environmental Management System, through proactive management of all related environmental matters.

Figure 1 below is the continuous improvement model this Environmental Management System follows.



LEADERSHIP

2.1 Leadership and commitment

PNL is committed to managing our environment and demonstrates this through a number of mechanisms, such as having the environmental management plan, which details the what, when, who, how and why of PNL’s environmental management, the Environmental Policy, the setting, monitoring and actively working toward the achievement of specific environmental objectives and targets, specific roles, responsibilities and authorities.

Leadership within PNL starts at the top of the organisation with monthly reporting on key environmental risks to the board, the annual review of performance against our environmental management system with the senior management team, and the annual training of all staff on our environmental responsibilities.

2.2 Environmental Policy

PNL’s environmental policy is our commitment to protecting the environment, to comply with our environmental obligations and to continually improve. This policy is a standalone document that sits within the EMS and is available to the public via our website and to staff via our intranet and on display in all business units. This Policy is reviewed every two years.

2.3 Organisational roles, responsibilities, and authorities

Environmental Management is the responsibility of all staff or contractors working for or on behalf of Port Nelson Limited. PNL delegates specific responsibilities for Environmental Management down through the PNL management team in accordance with the structure below in Figure 2.

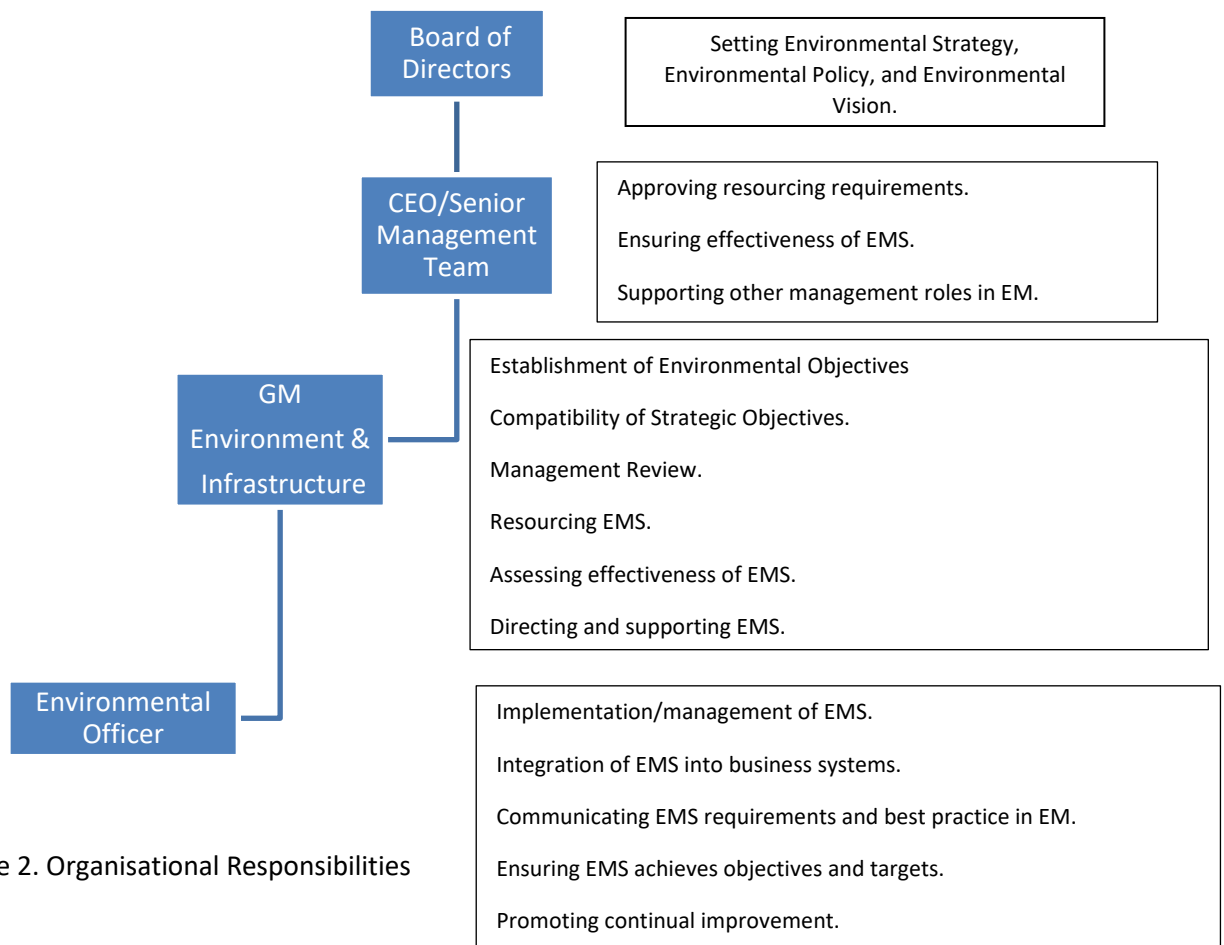


Figure 2. Organisational Responsibilities

PLANNING

3.1 Actions to address risk and opportunities

3.1.1 Environmental Aspects

Environmental aspects from PNL's activities are assessed using the Risk Management Policy (QM-POL-018). This is a risk-based approach to environmental aspects 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. PNL's environmental aspects register can be found in Appendix 1 of this document.

3.1.2 Compliance Obligations

PNL manages our resource consent requirements through compliance software administered by BraveGen, BraveGen enables PNL to enter its resource consent and the compliance obligations into the system, it enables the setting up of monthly and weekly reminders that certain obligations require actioning and monitors for any overdue actions, it hold records of any actions that are not completed within the required timeframe. For actions to be closed out evidence needs to be attached, to demonstrate compliance. A monthly compliance report is generated and included in the monthly board papers.

3.1.3 Planning actions

PNL develops a project management plan each year that priorities key environmental aspects, compliance obligations, risk and opportunities that have an impact on the businesses ability to comply with our compliance obligations, meet our objectives and targets, or are seen as an opportunities for the business to continue to operate at best practise level. Other projects that maybe included are those that have been identified throughout the year or through various reviews of the environmental management at Port Nelson.

The project plans are developed in accordance with PNL's Project Management Policy QM-POL-021.

3.2 Environmental objectives and planning to achieve them

PNL has a key vision to be a leader in sustainable environmental management in the New Zealand port industry. PNL has a strategic framework with a key objective - **Improving our environment and community**, which will be derived from our guardianship of the sea/community interface, minimising our environmental impact, recognising tangata whenua interests and our social contribution.

3.2.1 Environmental objectives

The setting of environmental objectives and targets are the responsibility of the Environmental management team. These are developed and / or revised in consultation with the PNL Senior management team and the board of directors on an annual basis.

The following inputs as a minimum should be considered when developing the objectives:

- Highest ranked EHS risks.
- Environmental incident/near miss reports.
- Compliance obligations.
- Non- conformances.
- Product requirements.
- Financial and operational requirements.
- Results of internal and external audits.

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- Results from the periodic employee and customers surveys; and
- Analysis of performance against previous objectives.

A detailed target or measurement of conformance must then be set for each objective, ensuring that the target is measurable.

3.2.2 Planning actions to achieve environmental objectives

An action plan will be developed and implemented for each objective and target, detailing the responsibility, means and timeframe on how each objective and target will be achieved. There may be multiple actions and milestones in the action that address the same target.

Each action plan shall include these features:

- Identification of responsible function and manager,
- Actions to accomplish the objective and target
- Estimated resources (e.g. budget. Personnel, equipment),
- Schedule for completion of each major task, and
- Performance indicators.

Where it is identified that actions require significant resource, then the specific action or related groups of actions will be made into a project and a project plan will be developed in accordance with the Project Management Process.

3.2.2.1 Environmental targets

Our targets will be included in the environmental objective actions plans where relevant, these will be reviewed annually.

3.3 Support

3.3.1 Resources

Section 2.3 Roles responsibilities above, details the resources available for the establishment, implementation, maintenance, and continual improvement of the environmental management system.

3.3.2 Competence

PNL's Environmental training will be tracked by the Training function via vault. All employees including managers, supervisors, team leads administration staff, workshop employees and contractors are required to undertake the following routine training requirements:

- ISO14001:2015 Environmental Management System and annual environmental awareness training
- At least two environmental awareness campaigns will be undertaken annual.

Operational staff whose work activities could result in a direct impact on the Environment (for example: Mechanics) will be trained and assessed in those codes of practise that relate specifically to their role.

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3.3.3. Awareness

PNL inducts all staff and contractors to site, Staff complete an induction within 6 months of starting and contractors are required to complete an induction every two years for those working in the main Port area and yearly for those working at the Calwell Slipway.

Covered in the inductions are:

- PNL’s Environmental Policy and environmental management system.
- Environmental Obligations and Expectations.
- Procedures for reporting and managing environmental incidents.

3.3.4 Communication

3.3.4.1 Internal Communication

Internal communication regarding environmental management is primarily through the environmental function. The most appropriate method of environmental communication is selected based upon the nature of the information. Internal environmental communications may be accomplished using:

- The Port Nelson intranet (Gateway)
- Meetings – PNL Leadership team, Senior Management Team, Board of Directors
- Port Nelson weekly toolbox notes
- Environmental awareness training
- Environmental information sheets and videos
- Posters, banners
- Port Nelson employees and persons working on behalf of PNL may raise environmental initiatives, issues or concerns at any time to their immediate manager, Environmental function, or to the appropriate PNL person who can act.

3.3.4.2 External Communication

PNL actively communicates externally via several mechanisms, these being:

- RE:Port
- Annual Report
- Annual Noise newsletter
- Media releases
- Complaints

For significant projects that have an environmental impact, a separate communications plan is prepared.

3.4 Documented information

Primary documentation for the Environmental Management System includes but is not limited to:

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- This environmental Management Plan
- Environmental documents and records
- PNL policies, procedures, and codes of practice
- Site specific Environmental Management Plans and codes of practice

The purpose of the Environmental Management System documentation is to provide necessary information to employees and other interested parties as appropriate and to demonstrate due diligence and continuous improvement through appropriate and applicable systems, processes and training.

Documented information specific to the Environmental Management System sits within the Environmental Management System master folder within PNL’s internal server. These documents are listed below and subject to regular review:

- Risk Management Policy QM-POL-018 Version 1, Feb 19
- PNL Common User Protocol v11 16 Dec 17, QM-POL-044
- PNL Emergency Procedures Manual October 19, Version 16 QM-PRO-018-01
- PNLEMP Environmental Aspects V4.0 May 2018
- PNL Communications Plan V1 May 2018
- PNL EMS Management Review Template V2.0 Dec 2015
- PNL Internal Audit Schedule V4.0 May 2018
- PNL Resource Consent List May 2018
- PNL Spill response Plan V3.0 Aug 18
- PNL Survey Results 2018 V1 May 2018

3.4.1 Control of documented information

The Environmental Officer owns all the documentation in the EMS and is responsible for authorising, issuing, and maintaining these documents. The Environmental Officer is also responsible for coordinating function and local documentations to minimise repetition. Only the Environmental Officer, or nominated personnel, have write access and therefore control. Any print outs of EMS documentation will be uncontrolled copies and cannot be treated as an up-to -date version.

All controlled documentation shall contain a revision date, and title describing the document. A copy of obsolete documentation will be maintained by the Environmental Officer.

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.

3.5 Operation

PNL manages site operations that have significant environmental aspects, or are subject to environmental regulatory requirements, though as series of codes of practise. This code of practices

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details the specific control requirements. The effectiveness of the operational controls is subject to periodic compliance and conformance audits.

The environmental officer or designee is responsible for ensuring that operational controls are established for all activities, related to significant aspects or to regulatory requirements. These might also be used to avoid or minimise environmental risks. Stakeholders will be included in the establishment of these.

3.5.1 Operational Planning and Control

When establishing operational codes, the following will apply:

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.

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3.5.2 Emergency Preparedness and Response

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.

3.6. Performance Evaluation

3.6.1 Monitoring, measurement, analysis, and evaluation

PNL monitors and measures key areas of monitoring of the activities that may have a significant impact on the environment. To do this PNL will establish processes and mechanisms for monitoring and measuring the key areas of monitoring of the operations and activities that can have a significant impact on the environment.

PNL will define activities associated with maintenance and calibration of monitoring and measuring equipment associated with activities that may have significant environmental impacts. The calibration and verification method will be documented in this process.

Key areas of Monitoring

When selecting the key areas of monitoring to measure performance PNL will identify the parameters that are:

- Objective, verifiable and reproducible.
- Relevant to the organisation's activities.
- Consistent with the organisation's operational controls and/or environmental objectives and targets.

The Environmental Officer is responsible for establishing and documenting key areas of monitoring that must be monitored and measured These performance metrics will be documented within the following requirements:

- Compliance obligations
- Operational controls relating to significant environmental aspects
- Environmental Objectives and targets

3.6.1.1 Evaluation of compliance

PNL evaluates our compliance through several mechanisms. Resource consent requirements are managed through our BraveGen database,

Other legal requirements are managed through Quantate. Quantate is a business risk and compliance software solution that enables PNL to legal requirements and monitor compliance against these on a 6-monthly basis. Each action is assessed by the Environmental Officer and verified and closed by the General Manager Environment and Infrastructure.

Compliance is reported to the Board Monthly.

3.6.2 Internal Audit

3.6.2.1 Internal Audit Programme

To manage and assess its environmental performance, conformance with ISO14001:2015 and progress against environmental targets, PNL maintains an internal audit programme.

Details of this can be found in the PNL Internal Environmental Audit Schedule. The Environmental Officer is responsible for Maintaining the Audit Schedule and Conducting the Audits. Audits findings will be discussed with the Business Unit Managers and corrective actions agreed.

3.7 Management Review

On an annual basis the PNL senior management review the Environmental Management system to ensure its continued suitability, adequacy, and effectiveness. Areas of interest include:

- Results of internal audits and evaluations of compliance with legal and other requirements.
- Communication(s) from external interested parties, including complaints.
- The environmental performance for the organisation.
- The extent to which objectives and targets were met.
- Status of corrective and preventative actions.
- Follow up actions from previous management reviews.
- Changing circumstances, including developments in legal and other requirements related to the organisation's environmental aspects; and
- Recommendations for improvement

Outputs from the Management review includes recommendations to change elements of the Environmental Management System, including policy and objectives and targets, to achieve continual improvement.

3.8 Improvement

3.8.1 Nonconformity and corrective actions

PNL manages its nonconformity and corrective actions through several mechanisms these being:

- Incident Reports, which are recorded using the blue event report forms and in the HSE event reporting system. The procedure for this is found in the health and safety management plan (HSMP).
- Environmental Audits, corrective actions as a result of Environmental Audits are recorded and monitored for completion.
- Nonconformities against legal and other requirements are monitored via Brave Gen and Quantate, where a non-conformity is identified corrective actions are put in place, and council notified if it is a direct breach.
- Nonconformities with policies and procedures are reported either as an incident report, or as corrective actions from an environmental audit.
- Community complaints are either raised as an incident via the incident reporting process, or as a community complaint. Community complaints are managed in accordance with the Port Nelson Noise Management Plan. The number of complaints is reported to the board monthly.

3.8.2 Continual Improvement

PNL records improvement opportunities via the event report forms, opportunities are passed on to the relevant division for consideration and actioning.