



PORT  NELSON

Environmental Management System Manual

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Introduction

1 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 Purpose: To facilitate regional prosperity.

(Kia āhei ki te kōkiri whakamua ki te taumata ā-rohe)

Our Environmental Goal:

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 of EMS

Port Nelson is a diverse operation with a variety of operational activities, which are undertaken across multiple sites. Operations are within the following business units:

- Container Operations
- Forestry & General Stevedoring
- Marine Operations
- QuayPack Operations
- QuayConnect
- Environment & Infrastructure
- People & Safety
- Communications and Engagement
- Business services

The areas in which Port operations are conducted, those that are owned by others and those that are leased and outside the control of the EMS are shown in Figure 1.



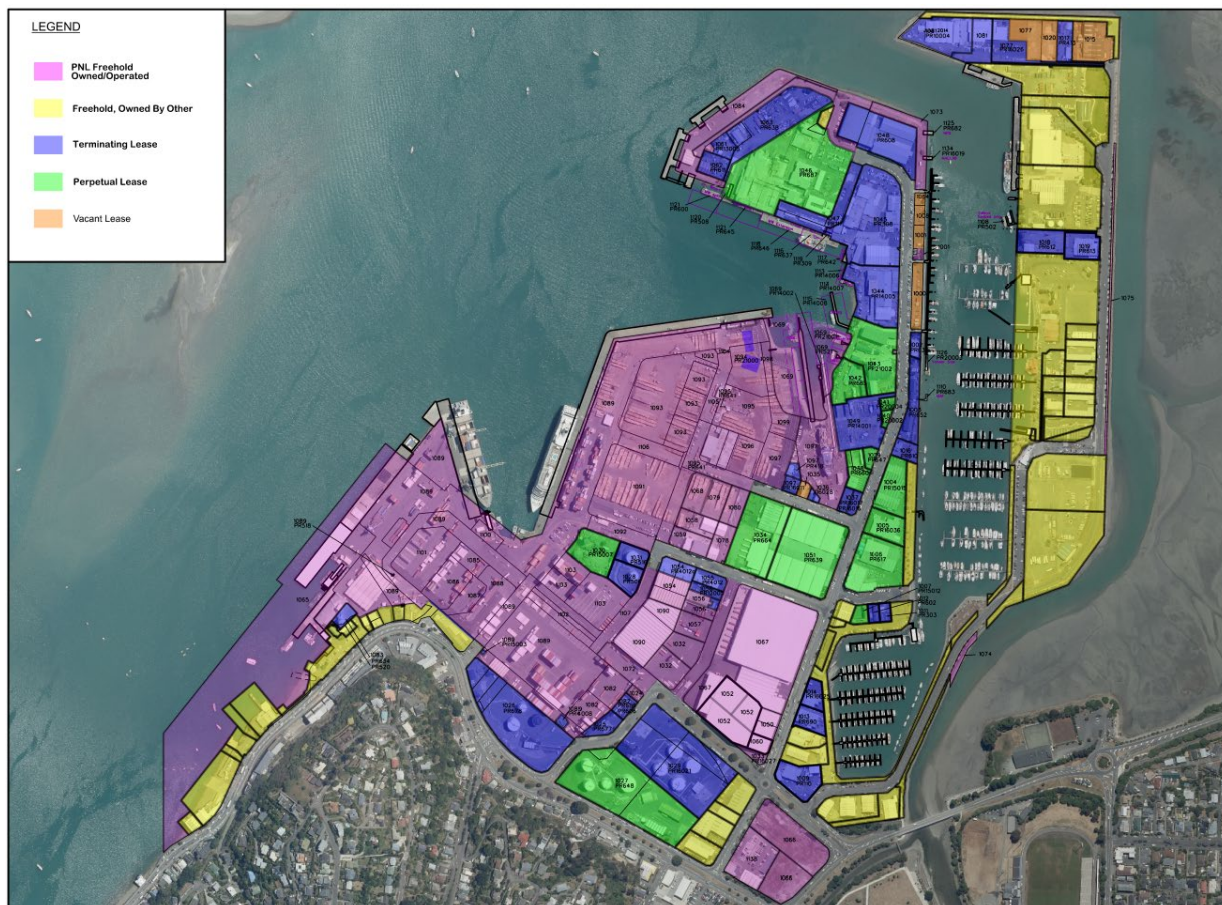


Figure 1 Port Nelson Industrial Area

The majority of PNL’s operations are within the Port Nelson Operational Area, however Port Nelson also operates diggers at Picton for the purpose of log stevedoring on vessels arriving at Port. Any operations at Picton are undertaken in accordance with Port Marlborough’s Management Systems and dust, noise and spills etc. are managed directly by the Port of Marlborough.

Port Nelson also has a staff member located at the Cloudy Bay – Central Express warehouse operations and Auckland Wine Works office to coordinate the shipment of customer products. Given the limited level of activity and lack of direct control of assets at Picton, Auckland and Cloudy Bay these are outside the scope of this EMS.

Table 1 defines those internal and external activities PNL has direct control over at Port Nelson.



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 (Main Wharf, Brunt Quay, McGlashen Quay, Kingsford Quay). 	<ul style="list-style-type: none"> Vessels at non PNL berths and Marina. Discharges to air from ships at berth. Biosecurity
Cargo Receival, 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 Operation at the Nelson Slipway At PNL commercial berths. 	<ul style="list-style-type: none"> 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 Approved Transitional Facilities (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 by external contractors 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.



Activity	Direct Control (in scope of EMS)	Limited Control (out of EMS scope)
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 third-party logistics.	<ul style="list-style-type: none"> Movement and storage of cargo in and out of QuayPack and QuayConnect facilities by PNL. 	<ul style="list-style-type: none"> Movement of cargo by CEL, and other transport companies.

1.3 Environmental Management System (EMS)

Our EMS encompasses our Environmental Policy, Environmental Strategy, Management Plans, Action Plans, and Standard Operating Procedures. The framework below illustrates how the various components fit together to develop the overall business strategy.



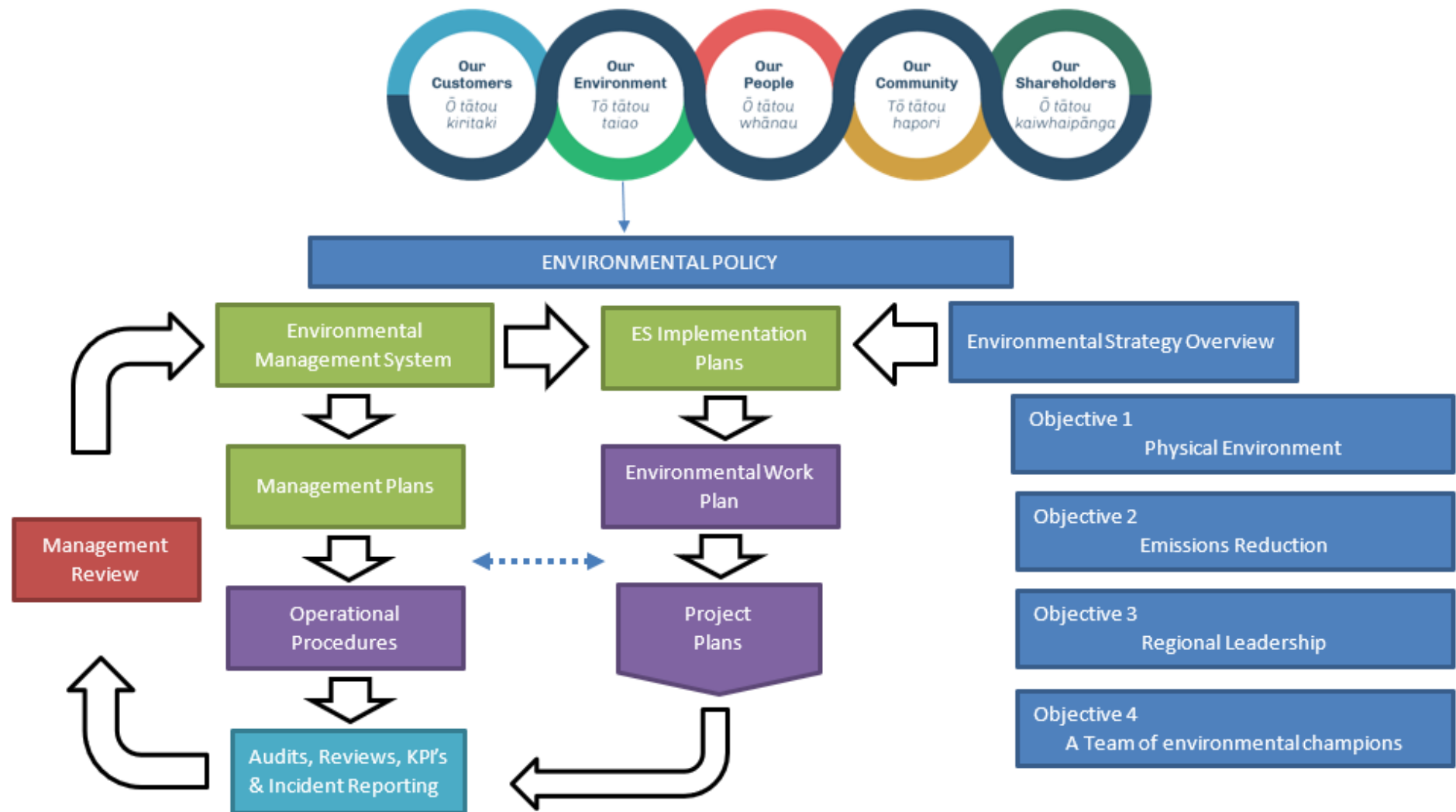


Figure 2 Environmental Management System Framework



Leadership

2 LEADERSHIP

2.1 Leadership and commitment

PNL is committed to managing our environment and demonstrates this through a number of mechanisms, such as having an EMS, which details the ‘what’, ‘when’, ‘who’, ‘how’ and ‘why’ of PNL’s environmental management. This system is governed by the PNL’s overarching Environmental Strategy and Environmental Policy, and implemented through the setting, monitoring and actively working toward the achievement of specific environmental objectives and targets.

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

2.2 Continuous Improvement

PNL is committed to managing, growing, and continually improving its EMS, through proactive management of all related environmental matters and monitoring progress through audits and reporting.

Figure 2 below is the continuous improvement model this EMS follows.

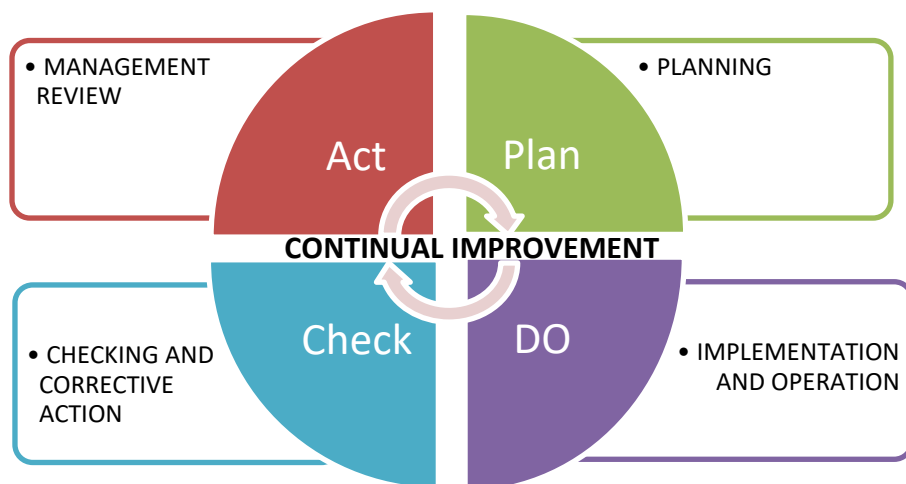


Figure 3 Continuous Improvement Model

2.3 Environmental Policy

PNL’s environmental policy (Figure 4) 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 Framework (Figure 2) and is available to the public via our website and to staff via our intranet and Employee Handbook. This Policy is reviewed as part of the annual Senior Management Review (SMR) in March every year. If any changes are deemed appropriate as part of the review then the Policy will be updated.

ENVIRONMENTAL POLICY

Port Nelson is the maritime gateway for the Nelson, Marlborough, Tasman region – a vital hub for economic activity and a key stakeholder in our region's continued growth and prosperity.

OUR GOAL IS TO:

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

The Environmental Management System and actions of the PNL Board of Directors, Management and Staff shall conform with the following policy, which is our commitment to:

- Ensuring all activities undertaken on the Port shall comply with all relevant environmental legislation and regulation.
- Maintaining an Environmental Management System that is current, actively managed and conforms with this policy.
- Monitoring all environmental impacts made by the Port.
- Ensuring the Environmental Management System sets objectives and targets for the reduction of PNL's environmental impact and actions to work towards those targets.
- Including in the Environmental Management System a goal of zero net greenhouse gas emissions by 2050.

- Requiring all third parties operating on the Port to actively manage their environmental performance and PNL will audit that performance.
- Adopting a continuous improvement approach to the protection of the environment the Port operates in, minimisation of the Port's environmental impact and the prevention of pollution.
- Actively seeking knowledge and the application of technologies that assist in reducing the Port's environmental impact.
- Recording and investigating all environmental incidents that occur at the Port.
- Recognising the role of tangata whenua in making decisions that impact the environment.
- Carrying out a balanced assessment of economic, environmental and social factors when making any capital or operational purchase decision that will result in an environmental impact.
- Maintaining conformance with an internationally or nationally recognised environmental management standard that supports the pursuit of best in class environmental performance.



Figure 4

PNL Environmental Policy (Dec 2019)

2.4 Organisational roles, responsibilities, and authorities

Environmental Management is the responsibility of all staff or contractors working for or on behalf of PNL. PNL delegates specific responsibilities for environmental management down through the PNL team in accordance with the structure below in Figure 5.

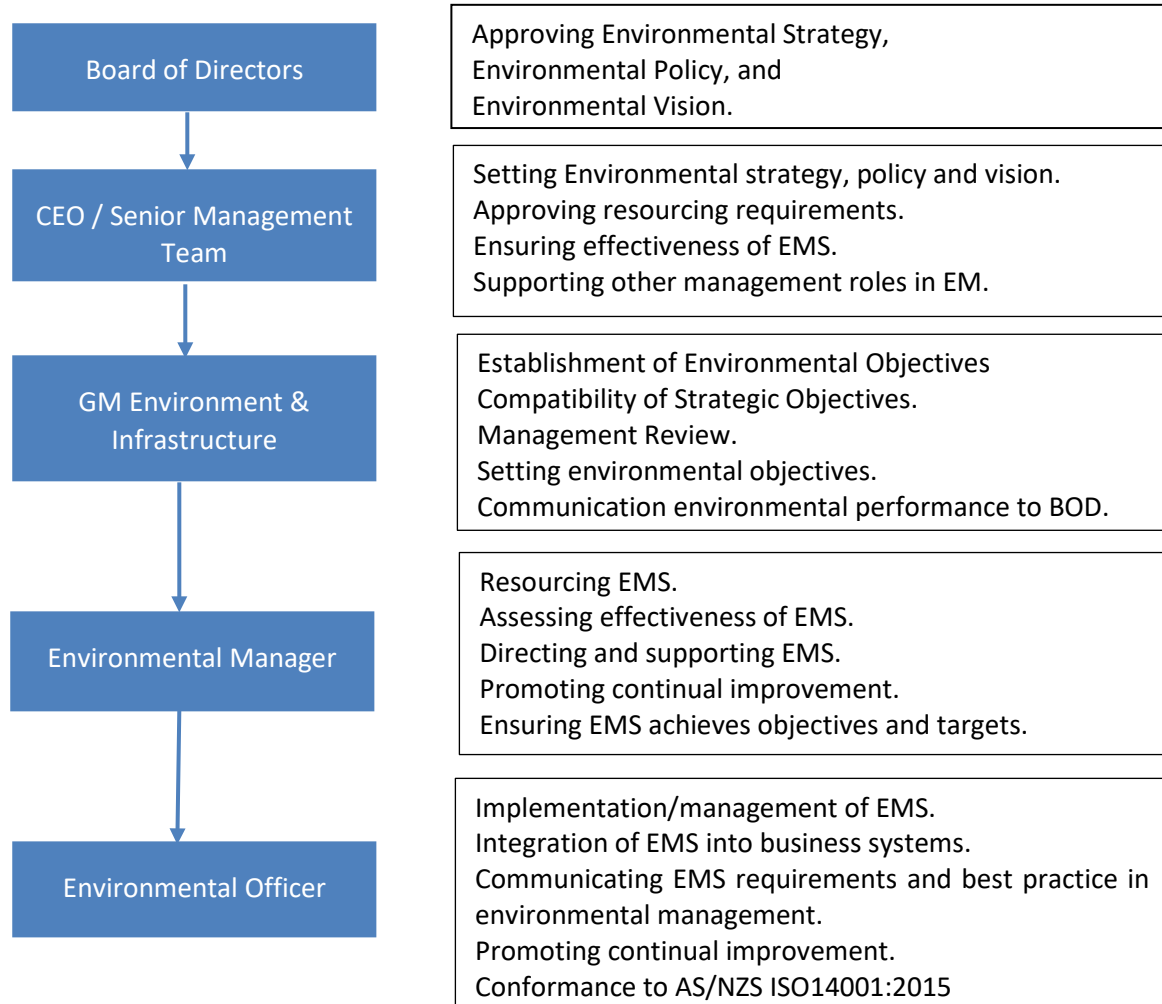


Figure 5 PNL Organisational Responsibilities

2.5 Interested Parties

Te Taihu iwi are an important environmental and cultural partner in the region. PNL recognises the whole of system approach of Te mana o te wai, from maunga to moana and the role that PNL plays within the coastal marine environment (CMA). PNL endeavours to meet, discuss and collaborate on environmental matters, seek advice from iwi and listen to tangata whenua views as part of resource consenting and ongoing development opportunities. PNL partners with a kaumātua to support this important relationship.

PNL have a long-established relationship with our environmental stakeholders, which includes but is not limited to:

- Nelson City Council (NCC)
- Department of Conservation (DoC)
- Forest and Bird (F&B)
- Fish and Game New Zealand (F&G)
- Ministry of Primary industries (MPI)
- Ministry of Fisheries (MFish)
- Climate Leaders Coalition (CLC)
- Friends of the Nelson Haven (FoH)
- Haulshore Island Community Group
- Marina users
- Nelson Environmental Action Group (NEAG)
- Neighbouring properties
- Other industry, customers, and research organisations with an interest in the environmental side of PNL's business

Port Nelson manages these relationships through multiple forums these include:

- The Port Nelson Noise Liaison Committee (PNLC)
- The Port Nelson Environmental Consultative Forum (PNECF)
- Person Conducting a Business or Undertaking (PCBU) forum
- Annual Noise newsletters to residents within the port overlay boundary
- Attendance on local committees and groups
- Event reporting and complaints management
- PNL's website
- 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.





Planning

3 PLANNING

3.1 Environmental Aspects

The following Environmental Aspects and potential environmental impacts associated with Port activities have been identified. These are reviewed by the Environmental Team as described in section 3.1.1 on an annual basis.

Table 2 Environmental Aspects Register

Activity	Environmental Aspect	Environmental Impact
Plant Operation (floating and land based).	Resource use (fuel, electricity).	Depletion of natural resources.
	Release of NOx and PM	Human and ecological health
	Release of GHG (CO2 and refrigerants)	Climate change
	Wastewater discharge to sea	Human and ecological health
	Noise	Amenity value
	Fuel/Oil spill to CMA	Ecological health
	Fuel/Oil spill to land	Contaminated land
Devanning and vanning of containers (exclude operation plant)	Resource use (shrink wrap, flexi liners).	Depletion of natural resources.
	Waste generation.	Waste to landfill, contamination.
	Hazardous cargo spill	Discharge to land, air, and/or CMA
	Release of unwanted organism.	Incursion of unwanted organism, detrimental effect on natural ecological systems.
Vessel haul out, surface cleaning, repair and paint. (Slipways)	Discharge of unwanted marine organism from hull and niche areas.	Contamination of CMA, incursion of unwanted organism.
	Discharge of blasting and painting by-products (wet and dry).	Contamination of air, land, CMA. Accumulation in sediment.
	Uncontrolled disturbance of contaminated sediment	Release of historic toxins to CMA
	Non-compliant discharge to Trade Waste	Disruption of municipal water treatment process
	Noise Generation	Amenity effects, health effects.
	Waste management	Discharge of heavy metals and oils (rust, leaks) from retired equipment and parts to land and CMA
	Accidental discharge of oil/fluids.	Contamination and accumulation on land and/or CMA.
Vessel Movements (when under direct control of PNL pilot)	Navigation accident	Accidental discharge to CMA, disturbance to benthic, fauna and flora
Chemical and hazardous substance use and storage.	Discharge/spill of chemical or hazardous substance.	Contamination of land, water, air.



Activity	Environmental Aspect	Environmental Impact
	Hazardous waste, and/or contaminated waste generation.	Increased waste to landfill, accumulation, contamination of land.
Maintenance and capital dredging (including disposal)	Disturbance of the seabed.	Adverse effects on water quality and naturally occurring benthic ecosystem.
	Sediment release.	Increased turbidity in water column and adverse effects on naturally occurring benthic ecosystem.
	Resource use. (Third-party fuel)	Depletion of natural resources.
Dumping of dredged materials in spoil ground.	Discharge of contaminants.	Increased contaminant loading in water column and sediment. Adverse effects and accumulation in naturally occurring benthic ecosystem.
Container movements by PNL (excluding plant operation)	Noise Generation	Amenity effects, health effects.
	Discharge, accidental spill of cargo	Contamination of land, air and/or CMA.
Construction, demolition and maintenance of facilities.	Noise generation.	Amenity and health effects.
	Dust discharge.	Contamination of air, land, and water, nuisance, use of water.
	Accidental fire	Discharge of retardants and other contaminants to land, air and CMA
	Hazardous waste generation (e.g. asbestos).	Health effects, contamination of air, land and CMA. Land use, accumulation.
	Waste generation	Land use and accumulation.
	Stormwater discharge.	Contamination of CMA.
	Resource use. (Construction materials)	Depletion of natural resources.
Movement and storage of logs.	Fugitive dust discharge to air.	Health effects, nuisance.
	Fugitive dust discharge to stormwater.	Contamination of CMA.
	Log leachate and bark discharge to stormwater.	Contamination of CMA.
	Dust suppression	Water use
	Log debris build up in sumps.	Ponding, nuisance.
Site administration activities.	Waste generation.	Waste to landfill, contamination.
	Release of refrigerant in air-conditioning	Climate change
	Resource use.	Depletion of natural resources.
Plant Maintenance	Discharge of fluids, solvents.	Contamination of air, land, stormwater, CMA.
	Accidental fire	Discharge to land, air, CMA
	Hot works (welding)	Discharge to air, resource use
	Hazardous waste generation	Contamination of land, water, land use
	General waste	Land use



Activity	Environmental Aspect	Environmental Impact
	Washdown of plant	Accidental discharge of contaminants to stormwater
	Resource use.	Depletion of natural resources.
Procurement of materials and services.	Insufficient environmental consideration.	Resource depletion, increased resource use, increased waste generation.
Quarantine washdown operation.	Discharge of contaminated water	Contamination of air, land, stormwater, CMA.
	Release of unwanted organism	Incursion of unwanted organism, detrimental effect on natural ecological systems.
	Resource use.	Depletion of natural resources.
Container pre-tripping washing and repair. (container repairs undertaken by third party)	Noise generation.	Amenity effects, health effects.
	Spray drift, discharge/spill from waterblasting (packaging waste/paint)	Contamination of air, land, water, nuisance.
	Resource use.	Depletion of natural resources.
	Waste generation	Land use and contamination
	Accidental discharge of contaminated washwater.	Contamination of land, stormwater and CMA.
Discharge from Sealord	Discharge through Stormwater Drain	Contamination of stormwater and CMA and Consent non-compliance
Layup Berth	Waste Generation	Land use and contamination
	Release unwanted organisms	Incursion of unwanted organism, detrimental effect on natural ecological systems
	Hazardous Waste	Contamination of land and CMA
	Discharge of ballast water	Contamination of CMA
	Oil spill from refuelling	Contamination of CMA

3.1.1 Actions to address current environment risk and opportunities

All environmental aspects have been scored in accordance with the risk matrix included in the [PNL Risk Management Policy QM-POL-018](#). This scoring considers the likelihood of occurrence and consequence in terms of safety, environment, financial and reputation if an event occurs. Each environmental aspect is then given an overall score and a risk rating of either very high, high, medium, low, or very low. This is reviewed annually and recorded within the PNL's Environmental Aspects Register.

Significant environmental aspects are currently reserved to activities that score high or very high on the aspect ranking system and will be given a priority focus. These aspects are actively managed through appropriate control mechanisms and applicable legislation by PNL. The score threshold that deems priority focus is reviewed as part of the annual aspects register review and the threshold adjusted accordingly.

Addressing significant environmental aspects are the responsibility of the environment team. This is achieved through the development of environment management plans, operating procedures, or capital work project plans and progress is monitored through the environmental work plan.

The environmental aspects register is reviewed by the environmental team on an annual basis to assess if the likelihood, or consequence level has changed for any aspect within the previous 12 month period. Changes may be because of completion of infrastructure or capital projects, update of management procedures, or implementation of new operational or control measures etc.

If a project scoring is altered as part of the annual aspect register review, then an update is provided to the PNL senior management team and the Board of Directors as part of the annual EMS review.

3.1.2 Procedure for Assessing New Activities

Changes to Port activities are considered when they arise for their environmental impact via the weekly environmental team meeting.

Future activities to be undertaken by PNL are also identified by the senior management team as part of the long term and annual plans and considered for their environmental impact by the Environmental Team as part of the environmental aspects register review.

Environmental aspects of new activities are rated for significance using the risk matrix included in the [PNL Risk Management Policy QM-POL-018](#). Should a future activity score medium or greater on the aspects risk rating then appropriate mitigation and measures shall be identified and implemented prior to a new activity commencing.

3.1.3 Procedure for Assessing Environmental Aspects for Capital Projects

For any Capital works projects where the effects are considered unavoidable, more than minor and temporary will have a project specific EMP developed to manage and mitigate any environmental risk and/or effects arising during that project. The project specific EMP would be considered and rated for significance using the risk matrix included in the [PNL Risk Management Policy QM-POL-018](#). Project risks shall be managed in accordance with [PNL's Project Management Policy QM-POL-021](#).

3.2 Compliance Obligations

3.2.1 Legal register

PNL manages our legal requirements through a legal register held on its PNL EMS sharepoint. The environment team is responsible for updating this register as changes to legislation occur. Changes to legislation are monitored through updates from Central Government, Ministry for the Environment (MfE), and local Council etc, attendance on the Ports Australia Noise subcommittee and through participation at relevant conferences and forums.

A register of all current environmental consents and permits that PNL is required to comply with is also maintained by the Environment team on the PNL EMS sharepoint.

Any new project is considered against existing consent approvals and relevant local and national government policies and legislation as part of the project plan to identify if any resource consents or trade waste permits needs to be applied for prior to works commencing.



3.2.2 Compliance management

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 holds 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.

3.2.3 Events reporting

Environmental incidents / events require an 'Port Nelson Event Report' form to be completed. This can be located on the PNL website and can be completed by anyone. PNL staff can also report an event through Damstra Safety Portal (often referred to as 'Vault') application accessible via the company intranet (Gateway). This records the nature of the event or non-compliance, if any environmental damage occurred, if anyone was injured and any immediate actions undertaken. Once all the information has been added the information is sent to an assigned person for investigation and corrective action.

Any environmental events are assessed by the Environmental team in line with risk matrix included in the [PNL Risk Management Policy QM-POL-018](#) and details of the investigation, any short and/or long term follow-up actions identified and recommendations for improvements to procedures recorded against the event within Damstra.

All events are reported to the PNL senior management team and the board of directors on a monthly basis via Power Bi application.

3.2.4 Planning action

PNL maintains an environmental work plan and develops project plans as required that prioritise 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 opportunity for the business to continue to operate at best practise level.

Any non-compliance notices, reminders for compliance reporting or event reports relating to environmental issues are managed by the Environmental officer and actions identified within the environmental team meetings. Where capital works are required project plans are prepared. The project plans are developed in accordance with [PNL's Project Management Policy QM-POL-021](#).

3.3 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.

PNL senior management team and Board of Directors reviews its strategy every five years and sets new objectives and targets as appropriate. The next review is due 2025/26 financial year.



3.3.1 Environmental objectives

The setting of environmental objectives and targets are developed by the Environment Team in consultation with the PNL senior management team and endorsed by the Board of Directors as part of the Strategy review.

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

- Highest ranked environmental risks.
- Environmental event / near miss reports.
- Compliance obligations.
- Non-conformances.
- Product requirements.
- Financial and operational requirements.
- Results of internal and external audits.
- Results from the periodic employee and customers surveys; and
- Analysis of performance against previous objectives.

Current strategies /objectives and targets are set out within the PNL Environmental Strategy and included in Figure 6.

3.3.2 Environmental targets

A detailed target or measurement of conformance must then be set for each objective, ensuring that the target is measurable. Our targets are also set out in Figure 6 and progress against target will be reviewed by the PNL senior management team on an annual basis to determine if additional actions are required.



STRATEGY 1



Port Nelson will minimise its impacts on the physical environment.

PNL will reduce operational impacts on the physical environment through proactive management of its 'damaging' activities: dredging, dust, stormwater, noise, spills, and traffic congestion.

Our Target: By 2026

- ✔ No uncontrolled discharges of stormwater to the coastal marine area.
- ✔ Minimise discharges of dust to the atmosphere.
- ✔ No noise events (events over 82dBA (LMax) at the closest residential boundary).
- ✔ No uncontrolled substance release to the coastal marine area.
- ✔ No community complaints relating to traffic congestion in the port zone.
- ✔ Compliance with all the requirements of our dredging consent.

STRATEGY 3



A leader in environmental management in the Nelson Tasman & Marlborough regions.

PNL will be a leader in environmental management in the Te Taihū region by implementing innovative solutions for managing our environmental aspects.

Our Target: By 2026

- ✔ Maintain ISO14001:2015 certification.
- ✔ Adopt a Green procurement approach.
- ✔ Adopt a zero waste to landfill approach.
- ✔ Sponsor regionally significant environmental initiatives.

STRATEGY 2



42% gross reduction in scope 1 and 2 emissions and 30% gross reduction in PNL controlled scope 3 emissions by 2035.

PNL are committed to minimising energy use and reducing carbon emissions without compromising the delivery of services to our customers or community.

Our Target: By 2026

- ✔ 20% gross reduction in scope 1 and 2 emissions.
- ✔ 15% gross reduction in PNL controlled scope 3 emissions (general waste and domestic and international travel).
- ✔ To work with customers and suppliers to assist them on their emissions reduction journeys or to meet their emissions reduction targets.

STRATEGY 4



The team at PNL are our environmental champions.

PNL will integrate environmental management into our daily operations, it will become part of what we do and be owned by everyone at PNL.

Our Target: By 2026

- ✔ 50% increase in environmental event reports (baseline year 2020).
- ✔ Environmental awareness training provided to all employees.
- ✔ All PNL employees champion environmental management.
- ✔ Complete pulse checks to gauge PNL employee's ongoing awareness.

Figure 6 Environmental Targets by 2026

3.3.3 Planning actions to achieve environmental objectives

The five-year Environmental Strategy sets out specific actions required to achieve its targets. Those actions are given effect and further developed via annual ES Implementation Plans that set out timings and responsibilities.

The annual plans are managed on on-going basis via environmental work plan. This plan also contains actions arising from management plans and improvement opportunities register based on management reviews and environmental audits.

Each annual implementation plan shall include these features:

- List of action(s) under each PNL Environmental Strategy target that shall be progressed within the financial year
- Identification of tasks and responsibilities to achieve each action,
- Schedule for completion, and
- Targets / deliverables as appropriate.

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 developed in accordance with PNL's [Project Management Policy QM-POL-021](#).

Progress against the annual implementation action plan shall be reported to the senior management team and Board of Directors as part of the annual EMS review.





Support

4 SUPPORT

4.1 Resources

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

The resources are further allocated via Environment Work Plan.

4.2 Competence

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

- New staff inductions
- PCBU inductions to enter the port and regular reviews
- ISO14001:2015 EMS 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, log operations etc) will be trained and assessed in those codes of practise that relate specifically to their role.

4.3 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 EMS.
- Environmental Obligations and Expectations.
- Procedures for reporting and managing environmental events.
- Spill kits and spill management

4.4 Communication

4.4.1 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
- Internal environmental audits



- 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.

4.4.2 External Communication

PNL actively communicates externally via several mechanisms, these being:

- RE:Port
- Annual Report
- Annual Noise newsletter
- Media releases
- Complaint reporting

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

4.5 Documented information

Primary documentation for the EMS includes but is not limited to:

- PNL Environmental Strategy and Environmental Policy
- This EMS manual
- PNL Environmental Strategy Implementation Plans
- PNL policies, procedures, and codes of practice
- PNL Environmental Work Plan and project plans
- Site specific Environmental Management Plans
- Audits and Reporting

The purpose of the EMS 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.

Documentation is located on the PNL EMS sharepoint site.

4.5.1 Control of documented information

The Environmental team owns all the documentation in the EMS and is responsible for authorising, issuing, and maintaining these documents. The Environmental team is also responsible for coordinating function and local documentations to minimise repetition. Only the Environmental team, 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 team.

The current version of the PNLEMS is available on PNL's Website.





Operation

5 OPERATION

PNL manages site operations that have significant environmental aspects, or are subject to environmental regulatory requirements, through a series of operating procedures (OP) or codes of practice (COP). The effectiveness of the operational controls is subject to periodic compliance and conformance audits.

The environmental team 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 may be included in the establishment of these.

5.1 Operational Planning and Control

When establishing operational codes, the following will apply:

5.1.1 Establish

- Assessment of the environmental effects of new/changed activities
- Environmental advice on PNL projects
- Understanding strategic direction of business
- Understanding each business Unit and the various activities involved
- Environmental input into capital expenditure
- Scheduled review of environmental aspects
- Understanding projected shipping and cargo volumes
- Understanding appropriate control mechanisms available
- Understanding compliance obligations
- Understand best practice in environmental management within Port industry
- Understand sustainable business practice within Port industry and the wider industrial sector.

5.1.2 Implement

- Desired environmental outcome(s) to be identified
- Operating procedure (OP) development and review
- Work with business unit managers and contractors (where appropriate) on how the OP can be implemented
- Agree the Business Unit Managers roles and responsibilities for implementation and monitoring
- Provision of applicable information in inductions and staff meetings
- Reporting of environmental events
- Monitoring activities and how effective OP is working to achieve desired outcome

5.1.3 Maintain

- Monitoring desired environmental outcome
- Review OP in line with monitoring data and event reporting
- Provide training and advice to PNL staff, contractors, and site users
- Managing changes to OP in line with business growth and diversification



5.1.4 Continual Improvement

- Annual audit of operations with Business Unit Managers
- Event reporting investigation/outcome
- Looking for innovative ways to reduce environmental impact, number of events or resource consumption further
- 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.

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. All PNL's health and safety procedures, policies and response plans are available to all staff on the Port Nelson intranet (Gateway).





Performance Evaluation

6 PERFORMANCE EVALUATION

6.1 Monitoring, measurement, analysis, and evaluation

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

6.1.1 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 team 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

6.1.2 Evaluation of compliance

PNL evaluates our compliance through several mechanisms. Resource consent requirements are managed through our BraveGen database as detailed in Section 3.2.2 and compliance is reported to the Board of Directors monthly as part of our PowerBI dashboard.

6.2 Internal Audit

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 team 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.



6.3 Management Review

On an annual basis the PNL senior management review the EMS 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.
- Progress towards annual implementation action plans
- Updates to the environmental aspects register
- 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 may include recommendations to change elements of the EMS, including policy and operating procedures, to achieve continual improvement.





Improvement

7 IMPROVEMENT

7.1 Non-conformity and corrective actions

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

- Event Reports, which are recorded using the online 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.
- Non-conformities against resource consent and other requirements are monitored via Brave Gen, where a non-conformity is identified corrective actions are put in place, and council notified if it is a direct breach.
- Non-conformities with policies and procedures are reported either as an event report, or as corrective actions from an environmental audit.
- Community complaints are either raised as an event via the events 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.

7.2 Continual Improvement

PNL records improvement opportunities via the Port Nelson event report forms, audit reports and EMS reviews, opportunities for environmental improvement are passed on to the relevant business unit managers for consideration and actioning with support of the environmental team.

Opportunities for improvement are identified via annual ES Implementation Plans, continual engagement with staff and external stakeholders and during weekly environment team meetings. Identified opportunities are recorded and tracked in the Improvement Opportunities Register.





Appendices

APPENDIX 1 – DOCUMENT CONTROL

Appendix 1 Document Control

Issued By	EO	
Approved By	GMI	Version 7.0
Annual Review Due	EO	January 2023
<i>Document is Uncontrolled in Print</i>		

VERSION NUMBER	DATE	DETAILS OF CHANGES MADE	REVIEWED BY	APPROVED BY
V 2.3	Feb 2015	Update to include management review, 2014/2015 EAP, current dates, change in EO.	Kelly Leonard	Matt McDonald
V 3.0	Mar 2015	Content review, COP'S into separate document, addition of document control, amend order.	Kelly Leonard	Matt McDonald
V 3.1	Jan 2016	Revised Environmental Policy, reviewed aspects/impacts. Reference to CUP, updated PNLC members, updated org chart, revised audit schedule, updated acoustic treatment list.	Kelly Leonard	Matt McDonald
V3.2	Apr 2016	Inclusion QuayPack operation in Blenheim, update audit schedule, addition of RM155421, update acoustic treatment of properties.	Kelly Leonard	Matt McDonald
V3.3	May 2016	Update scope, aspects/impacts, legislation.	Kelly Leonard	Matt McDonald
V3.4	Nov 2016	Inclusion PNL Spill Response Plan.	Kelly Leonard	Matt McDonald
V3.5	Dec 2016	Review Plan for currency, update as appropriate.	Kelly Leonard	Matt McDonald
V3.6	Mar 2017	Minor edits, update schedules.	Kelly Leonard	Matt McDonald
V3.7	Jun 2017	Minor edits roll over schedules to 2017	Kelly Leonard	Matt McDonald
V4.0	May 2018	Minor edits, schedule updates	Kelly Leonard	Allanagh Rivers
V4.1	Nov 2018	Minor edits, schedule updates	Kelly Leonard	Allanagh Rivers
V5.1	Dec 2019	Minor changes to structure and framework	Kelly Leonard	Allanagh Rivers
V6.0	Apr 2020	Major changes to structure and framework to reflect International Standard guidance	Allanagh Rivers	Allanagh Rivers
V7.0	Feb 2022	Updated to reflect conformance with ISO14001:2015 and changes to Environment team structure	Kathryn Halder	Allanagh Rivers
V7.1	March 2022	Update with new aspect register and risk assessment following workshop	Kathryn Halder	Allanagh Rivers



Appendix 2 Definitions

The “*” symbol after a word means that the definition has been taken from the Interpretation section of the Resource Management Act 1991 (RMA).

Biosecurity	The prevention of the introduction of unwanted organisms not already established in New Zealand, i.e. border control. It also refers to the management of unwanted organisms that are established in New Zealand, through the development of pest management strategies.
Climate Change	Increasing amounts of pollution from industry, agriculture, motor vehicles and electricity generation, deforestation and other activities have led to an undesirable build up of greenhouse gases in the atmosphere. The effect of this build up has been described as “climate change”. This change is relatively rapid compared with the natural, gradual changes in the Earth’s temperatures and climate that often have allowed people and other species to adapt to them.
Coastal Marine Area	Includes the foreshore, seabed, coastal water and the air space above the water, as defined in the Resource Management Act 1991.
Contaminant*	<p>Includes any substance (including gases, liquids, solids and microorganisms) or energy (including heat but excluding noise) that, either by itself or in combination with the same, similar or other substances, energy or heat:</p> <ul style="list-style-type: none">a) when discharged into water, changes or is likely to change the physical, chemical or biological condition of water; orb) when discharged on to or into land or into air, changes or is likely to change the physical, chemical, or biological condition of the land or air on to or into which it is discharged.
Discharge	Includes emit, deposit and allow to escape.



DoC	Department of Conservation
Ecosystem	A dynamic complex of plant, animal and microorganism communities and their non-living environment, interacting as a functional unit.
Effect*	<p>Includes:</p> <ul style="list-style-type: none">a) any positive or adverse effect;b) any temporary or permanent effect;c) any past, present or future effect;d) any cumulative effect that arises over time or in combination with other effects, regardless of the scale, intensity, duration or frequency of the effect;e) any potential effect of high probability; andf) any potential effect of low probability that has a high potential impact.
Energy	Energy due to position or associated with changes in position (e.g. gravitational potential energy) or changes in shape (e.g. as in a compressed or stretched spring).
Environment*	<p>Includes:</p> <ul style="list-style-type: none">a) ecosystems and their parts, including people and communities;b) all natural and physical resources;c) amenity values; andd) the social, economic, aesthetic and cultural conditions that affect the matters stated in a) to c) of this definition or that are affected by those matters.
EMS	Environmental Management System



APPENDIX 2 - GLOSSARY

Hazardous substance	Any substance with one or more of the following properties: an explosive nature; flammability; an oxidising nature; acute or immediate toxicity; delayed or chronic toxicity; radioactivity; corrosiveness and environmental persistence. The substance, during typical storage, use or transportation, poses a significantly elevated risk, above those of other everyday affairs and activities, of an adverse environmental effect or, in its disposal, requires control or management beyond that normally applied to wastes at a landfill for disposal, if environmentally sound disposal is to be achieved.
Maintenance Dredging	Any dredging of the seabed necessary to maintain navigable water depths to previously approved levels, for the safe and convenient navigation of vessels, in navigation channels and at berthing and mooring facilities, including marina developments.
MfE	Ministry for the Environment
MFish	Ministry of Fisheries
MPI	Ministry for Primary Industries (Formerly Ministry of Agriculture and Forestry)
Natural and Physical Resources	Includes land, water, air, soil, minerals, energy, all plants and animals (native to New Zealand and introduced), and all structures.
NCC	Nelson City Council
PNL	Port Nelson Ltd
Port	Any area of land or water, whether or not it is within the coastal marine area, used, intended or designed to be used either wholly or partly for port-related activities.



APPENDIX 2 - GLOSSARY

Port noise	Noise generated within a port, including noise from handling cargo and passengers; operations of machinery and equipment; ships at berth; maintenance, repair, storage and administration activities, and vehicle traffic only when it relates to port activities and when the vehicles are inside the port boundaries. Noise from vessels not at berth is excluded, as is noise associated with construction of permanent port facilities (construction work should be evaluated using <i>NZS 6803:1999 Acoustics construction noise</i>).
PNLC	The Port Nelson Noise Liaison Committee
PCBU	Person Conducting a Business or Undertaking
RMA	Resource Management Act 1991 and its amendments.
Transportation	The movement of materials by agents such as rivers, lakes, seas, wind, waves, land and air.
Vessel	Includes any ship, boat or other floating craft, or drilling rig or exploration platform (whether self-propelled or towed) with the purpose of exploration for, and extraction of, natural and physical resources from the seabed.



PORT  NELSON

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