



Policy Statement 101.4

ENVIRONMENTAL POLICY

The following statement has effect and forms part of the policies of the Company from the date of issue. Authorised by the Managing Director, Version 3 dated 12 April 2011.

1. Harmful Substances

All employees will take all practicable steps to ensure that environmentally harmful substances are not spilled, or left in any of the Company's sites in a condition, which could cause harm to the environment, fellow employee, agent of the Company, visitors or the community at large.

The following table outlines areas most likely to contribute to environmental damage and the suggested controls for each.

Potential sources of damage to the environment		Controls
1.	Plant and machinery	<ul style="list-style-type: none"> • Ensure that all plant and machinery is of sound condition with good battery cell, fuel, oil and hydraulic line integrity. • Regular checks/inspections and maintenance programs.
2.	Storage and use of log marking material	<ul style="list-style-type: none"> • All paint and thinners must be stored in an approved hazardous materials locker. • All paint delivered to the stevedore shipside must be kept inside the paint cage or stored in a safe area (near port-a-coms), and clear of vehicular traffic to prevent spillage or damage to containers. • Any paint delivered to the vessel must be placed as near as possible to the gangway. The crew must be notified immediately so that it can be taken on board. • Spillage of paint must be cleaned up immediately.
3.	Storage and use of chemicals and harmful substances	<ul style="list-style-type: none"> • A register of chemicals stored on-site and MSDS sheets must be maintained by the person in charge of gear and be available for inspection at all times. (See SOP 12.1) • Spillage of any substance considered to be harmful to the environment (refer list below) must be cleaned up immediately. <ul style="list-style-type: none"> a) Fuel (Diesel and petrol) b) Any cargo that falls into waterways c) Anti-sap stains – not held by ISO but in our worksite d) Hydraulic and engine oil



		<ul style="list-style-type: none"> e) Paint f) Plastic sheeting and rolls of plastic tape • Where a spillage has leaked into the water an immediate report must be made to the Company's senior management after the appropriate controlling authority has been notified. In most cases this would involve the Port Company and/or the fire service that have equipment available to contain spills.
4.	Bulk cargo – grain / fertilizer / coal	<ul style="list-style-type: none"> • A screen must be used to stop cargo being spilled into the harbour. This could either be a tarpaulin save-all or permanent fixture. • Any product split on to the side-decks of the vessel or onto the wharf apron are to be collected and disposed off according to the customers instructions.

2. Controlling Noise

Consideration must be given to the effect of noise on the surrounding environment. Everyone must be aware that noise can carry well beyond the work-site, especially at night. Wherever possible all practicable steps must be taken in the loading and un-loading operation to control excessive noise. This will include raising operator awareness and adopting the best and most effective work practices and procedures that minimise the output of noise. See work practices outlined in SOP 3.0 Loading Logs and SOP 3.2 Logs – Noise Control.

The following table outlines those areas most likely to cause excess noise and the suggested controls for each.

Areas most likely to cause excessive noise		Controls
1.	Striking lifting equipment or loads of cargo against open hatch lids and inside the hatch square	<ul style="list-style-type: none"> • Avoid contacting these areas of the vessel. Be ready to “counter” any swing in the gear. • Don't use the inside of the hatch square to flush logs. • “Luff” well away from open hatch lids before pulling out wires.
2.	Swinging log wires	<ul style="list-style-type: none"> • Kill any swing in the wire as often as possible on the logs themselves. • Hoist loose wires well clear of the vessel's structure. • Avoid using the side of a vessel, its side decks or open hatch lids to settle log wires.
3.	Excavators tracking on vessels	<ul style="list-style-type: none"> • Travel at a sensible speed, especially when on the tank-top or on the hatch lids. • Avoid wherever possible “rocking” the excavator.
4.	Using machinery to	<ul style="list-style-type: none"> • Minimise use of the butting tractor by flushing up only



	flush the ends of logs	<p>those logs that need fixing rather than the whole lift.</p> <ul style="list-style-type: none"> • Use hydraulic lever action rather than taking a run up into the logs.
5.	Landing equipment hard onto the wharf - Reefer and palletised cargo	<ul style="list-style-type: none"> • Crane drivers to stop 1m short of the wharf and then proceed slowly until cage landed. • Use rubber strips on wharf for the cage to land onto.
6.	Operating heavy machinery	<ul style="list-style-type: none"> • Ensure exhaust mechanism is efficient. • Ensure cowlings are placed around engines. • Reduce the volume on reversing sirens (ensure that the siren is clearly audible to personnel in the work area).

3. Logs in Tide

This Policy Statement deals with the Company's position on the prevention and the recovery of logs that have fallen into any harbour during the loading or unloading of log vessels.

Key Statements

1. The safety of all personnel, including members of the public are of paramount importance to the Company.
2. Logs that have fallen overboard and into a harbour present a significant hazard to other shipping and pleasure craft and as such pose a risk to the safety of others.
3. The Company will comply with the requirements of the "Code of Practice for the Carriage of Logs and Sawn Timber on Deck in New Zealand Waters. 31 March 1998".
4. The Company will endeavor to take every step available in order to a) prevent logs from falling into waterways and b) recover those logs that have fallen in as quickly as possible.
5. The Company will take immediate steps to report the loss of logs to the appropriate authorities.

Prevention (*Quotations from the Code of Practice in italics*)

1. Good pre-planning of the deck is essential well before loading is to commence. The plan must aim to utilize every available longer length log on the outside of the stow (i.e. against the stanchions) in order to provide a physical barrier for all shorter length logs which should be stowed on the inside (i.e. on the hatch lids). The code states, "...Wherever possible, logs of less than 5 metres in length will not be stowed touching any permanent or temporary stanchions at or near the ship's side..."
2. The Shipper can assist the stevedore by ensuring a reasonable mix of longer length logs are available to be loaded against the stanchions. The code states, "...every reasonable effort to minimise the need to ship on deck, logs of less than 4.0m in length, or logs of any length which have been debarked..."
3. Typically it is the shorter length logs that are most likely to fall through the stanchions during the loading. If these are the only lengths available then the



code states, “...Where short logs (being logs of less than 5 metres in length) have to be stowed touching the stanchions, it will be mandatory that such logs will be placed in stow or be held in stow with a device. This device will arrange or hold logs against the stanchions in such a way as to prevent them from slipping through the stanchions and falling over side...” The Company interprets that the best “device” available is an excavator, fitted with equipment to handle logs. In addition to short logs (5m or less) the code also states that a device should be used if, “...in the opinion of the stevedore, there exists a reasonable risk that those logs might be lost over side...” Considerations would include, the physical properties of the logs (i.e. whether they were excessively prone to slipping), the time of day, the weather at the time or the nature of the existing stow.

4. The wharf crews can also help during the slinging up operation by ensuring that each load is slung correctly and that the load lifts horizontal with an even bight across the base of the logs. This will help by allowing the wires to pull out evenly and minimise the possibility of the load to kick up at one end.

Recovery

The code states, “...The stevedore, acting on behalf of his principal, is required to take immediate and effective steps to recover such logs/sawn timber and ensure that they/it are removed from the water...” The Company policy on this issue is the following:

1. All staff involved in the loading must be diligent in spotting all logs seen falling from a vessel and notify immediately the details to the foreperson in charge.
2. The foreperson will take immediate steps to initiate the recovery process.
 - a) Firstly it must be identified whether or not the log(s) can be safely retrieved from the shore. If so, the log needs to be lassoed and secured to the wharf and later lifted out. If not then a log recovery vessel will have to be called out.
 - b) Wherever possible the Company will attempt to provide its own vessel for this purpose.
 - c) If there is no vessel provided by the Company then the Company will engage a contractor specifically for this purpose. The contractor must be notified immediately so that a recovery vessel can be sent out. Accurate details must be given about the logs and the direction of drift.
 - d) In most cases the Port Authority will have to be notified also about logs that have fallen into the water.
 - e) The safe operation of a recovery vessel is covered below.

Points of Contact

The Company has the following recovery arrangements (As at April 2011):

Port	Who to notify	Recovery Operator
Marsden Point	Peter Cross 0274172440 or 09 4340691 (Hm) Northport Gatehouse 09 432 5018	Peter Cross Or if not available ISO
Tauranga	Port of Tauranga Operations Customer	Sea Quest Marine (07) 575 5124, 0274 958 791



	Service Centre (07 5751888) who then contacts Sea Quest	
Gisborne	Eastland Port 021760031 (Dean Crow)	Dean Crow 021760031
Napier	Port of Napier Peter Frizzell	Peter Frizzell 0212467400
Wellington	Centre Port	Centre Port boat operated by ISO
Nelson	Port of Nelson	ISO
Picton	Hoki Perano who notifies Port Marlborough	Hoki Perano 0272319111
Timaru	Prime Port	ISO (If boat bought down for deck load) or Prime Port

Marshaller responsibilities

The Marshaller can also drop logs into the water, particularly as a loader is loading the bunks. To prevent this, the Marshaller should attempt to provide some type of barrier between the vessel and the wharf (i.e. a large log).

However, if the Marshaller does drop a log into the water, the Company still requires that our staff notify the foreperson in charge immediately who will in turn notify the Marshaller supervisor of what has occurred. It is important to remember that log recovery gets underway as soon as possible, no matter who was responsible for dropping it in the first place.

Record Keeping

The Company requires that all details be recorded on the forepersons daily "job sheet" for any log(s) that have had to be recovered from the water. The Principal also needs to know about the number of logs over board and whether or not they were recovered successfully.

In Tauranga, all logs lost in the tide must be recorded on the LOGSLOST folder in the "Foremans Directory". At the end of each month a report will be sent to the Tauranga Harbormaster.

Safe Ship Management Compliance

The Company requires all vessels involved in the recovery of logs to have an authorised "Safe Ship Management" (SSM) compliance certificate in accordance with the MSA requirements

Safe Operation of a Recovery Vessel

Safety

Significant Hazards of this operation are:

- a) Drowning – personnel must wear life jackets at all times. Don't overload the boat.
- b) Falling overboard – don't stand up unnecessarily.



- c) Injury to limbs when working up against the wharf or vessel – Keep all parts of the body inside the boat.

It is important to note that:

- a) The minimum number of persons on the boat is the operator themselves.
- b) The recommended and maximum number of persons on the boat is two, the operator and an assistant. The operator is responsible for the safety of the assistant and the vessel.
- c) Communications must consist of a marine radio for emergencies and one hand held vessel to shore radio (ISO). The operator is in charge of communications and should test these before launching the boat.

Recovery Operations

The operator must fill out a Log Book and complete the ISO pre-launch checklist before signing off.

Once a recovery vessel is launched and the motor is running the operator of the vessel must:

Firstly carry out these checks:

1. Ahead/astern drive is working
2. Steering is ok
3. Emergency stop lead is functioning

When these checks have been completed then the operator can proceed to find the logs. All relevant safety procedures and harbour regulations must be adhered to at all times.

Once the log is located it must be secured to the recovery vessel and towed back to a convenient location where it can be pulled out of the water.

