

1.0 Purpose

The IMS procedures that follow, form a system for proactively engaging the environment footprint at the NCPL port facility.

They incorporate environmental considerations and decision making into the ports day-to-day operations and into its strategic planning.

Additionally, IMS provides a structured framework designed to achieve continual environmental compliance beyond regulatory compliance, with the intent to improve efficiency, reduce costs and minimize negative impacts on human health and environment.

2.0 Responsibility

The Department Managers are responsible for ensuring the procedures that follow are effectively implemented and maintained.

3.0 Procedures

3.1 Benefits of the IMS:

- Improved environmental awareness, compliance, and performance.
- Reduced costs and improved operational efficiency through more efficient use of materials, operational streamlining, and strategic direction setting.
- Reduced risk and liability, and improved security and emergency response capability.
- Enhance credibility, public image, public confidence, as NCPL monitors and evaluates the environmental impacts and aspects and position themselves as leaders in environmental protection and management.

3.2 The IMS considers:

The internal and external environmental issues that may have a direct influence on the effectiveness of NCPL achieving the intended outcomes of its environmental management system.

- The needs and expectations of internal and external stakeholders (see Interested Parties Table).
- The current scope of NCPL's services and activities within the context of the IMS.

During the planning process, NCPL also determines the risks and opportunities related to its legal and other requirements, environmental aspects and other issues and requirements that need to be addressed in order to:

- Give assurance the IMS will achieve its intended outcomes.
- Prevent or reduce undesired effects / environmental harm.
- Achieve continual improvement.

Interested Parties Table - To be reviewed annually during Management / BSR Review			
Reference ISO 14001 section 4.2			
Interested Parties	Relevant Needs and Expectations	Compliance Obligations (when Yes – move to compliance obligations table later.	Comments
Clients/Customers	Price, reliability, value, and customer satisfaction.	Yes	

Regulators: Environmental, Port Authorities, State and Commonwealth Port State Control,	Compliance with regulations. Reporting	Yes Yes Yes Yes	
Managers	Information and Resources	Yes	
Employees	Shared values and security	Yes	
Tenants	Compliance with NCPL policy and procedures	Yes	
Stakeholders	Profitability and growth	Yes	
Local communities	Good relationships	Yes	

Description of NCPL's environmental themes

Theme	Description
Ambient Air Quality	Odor issues, dust, and ship's combustion emissions (SOx, NOx, particulates).
Flora & Fauna	Native flora and fauna, pests, and weeds.
Greenhouse Gas & Energy	Energy consumption and greenhouse gas emissions, carbon management and offsets.
Cultural Heritage	Bahamian cultural heritage.
Land & Seabed	Management of contaminated land, remediation, and land development.
Noise	Noise emissions.

Waste	Generation, reduction and recycling, hazardous, mineral, and general wastes.
Water	Contamination of marine waters, groundwater and storm water, usage of potable water, and generation of wastewaters.

3.3 Compliance Program:

NCPL's compliance program is designed to assist NCPL in meeting its legal and other regulatory requirements and reduce the risk of any legislative breach, as well as providing a framework for compliance with relevant laws, industry codes and organizational policy.

The program is delivered through the implementation of NCPL's Environmental Policy, and Environmental Procedures and SOP.

In an operational port context, NCPL's legal and other requirements can include:

- Regulatory obligations: for example, requirements under State and Commonwealth environment and cultural heritage legislation and the statutory approvals issued to NCPL under this legislation.
- Voluntary commitments: for example, a commitment to meeting industry standards, codes of practice, or the requirements of community agreements.

Environmental Aspects are characteristics of a facility's activities, products, or services that either impact the environment or could potentially impact the environment. These impacts could occur during normal, abnormal, accidental, or emergency situations.

Compliance Obligations Table: To be reviewed annually during Management – BSR Reviews.			
Source	Reference	Regulatory / Voluntary	Comments
Clients/Customers	Customer satisfaction policy.	Voluntary	Covered in IMSP-008

Regulators: Environmental, Port Authorities, State and Commonwealth Port State Control,	Bahamas Regulations for the environment.	Regulatory	Covered in Statutes and rules
Managers	NCPL Policies and procedures	Voluntary	IMSP Policy
Employees	NCPL Policies and procedures	Voluntary	IMSP Policy
Tenants	NCPL Policies and procedures	Voluntary	Contracts
Stake holders	NCPL Policies and procedures	Regulatory	Covered in statutes and rules.
Local communities	Good neighbor projects.	Voluntary	Public opinion

3.4 Identifying Aspects and Impacts:

Identifying the environmental aspects and impacts of NCPL's services and activities is the foundation of NCPL's IMSP on which continual improvement and management reviews are based. A current assessment of aspects and impacts relating to NCPL's services and activities is summarized in NCPL's Significant Environmental Risk Register which includes Significant Environmental Aspects.

Categories Commonly Used to Determine Significance of Environmental Aspects:

- Regulatory concerns.
- Pollution.
- Risk, including effects of chemicals & materials on workers, impacts on the surrounding community, and impacts on the environment, safety, and noise.
- Natural resource use.

NCPL has identified the following activities that could impact the environment where deemed to be significant, or occur at NCPL facility:

- Vehicle/equipment maintenance.
- Landscaping.
- Pavement maintenance.
- Building maintenance.
- Civil/ Site Construction.
- Water.
- Hazardous and solid waste disposal.
- Pesticides/herbicides.
- Fuel for vehicles.
- Vehicle emissions.
- Runoff and wastewater, concrete.
- Noise.
- Construction debris.
- Dust.
- Contamination of soil, groundwater, and surface waters

Examples of environmental aspects and impacts at the NCPL facility and all its work sites and activities include are listed in the Significant Environmental Aspects Register.

3.5 Risk and Opportunity Assessment:

NCPL applies a consistent and robust approach to risk management across the delivery of its services and activities. The Risk Assessment Procedure together provide the framework for determining how risks are consistently identified, assessed, treated, monitored, and reported on within NCPL. For each environmental aspect identified in the Environmental Risk Register:

- The risk (a function of likelihood, consequence, and control effectiveness) of impacts occurring is assessed using a qualitative five by five risk assessment matrix to determine the residual risk (note: NCPL assesses risk after controls have been implemented); and
- Opportunities or potential beneficial effects are identified and noted (where applicable).
- Significant environmental risks are defined as any environmental aspect with a residual risk rating of high or greater than 1, and all risks (regardless of risk rating) that do not meet NCPL's tolerability criteria, as outlined in the Environment Risk Register.
- The development of risk treatment plans is mandatory for all identified significant environmental aspects, each of which is required to be completed or reviewed within specified timeframes according to the level of risk tolerability. NCPL's risk treatment plans are developed and implemented by risk owners in consultation with the Environment and Quality & Environmental Management team

4.0 IMSP Objectives

Consistent with the requirements of NCPL's Environment and Quality Policy, NCPL has established several Quality & Environmental Management objectives and are quantified, where practicable to help the organization meet the intended outcomes of its integrated IMSP management system.

NCPL's environmental management objectives have been developed with consideration of:

- NCPL's Environment and Quality Policy.
- NCPL's legal and other requirements.
- NCPL's significant environmental risks.
- NCPL's strategic objectives.
- Environmental issues identified through the review of accidents, incidents, hazards, inspections, and monitoring; and
- The views of interested parties, both internal and external.
- Reference to NCPL/IMSP/001 details the guidance for documenting the environmental and quality objectives key driving strategies, programs and plans that have been implemented to assist NCPL in achieving its IMSP objectives and targets are available in the Objectives and Targets file.
- Some of the high-level Environmental Themes which are considered in the setting of some of the IMSP objectives and targets are listed in Objectives Table that follows.

Example of NCPL Significant Environmental Risks and Associated Risk Treatment Plan

Risk Description	Risk Rating	Risk Treatment Plan(s)	Risk Owner	Environmental Theme	Action Due Dates
Existing contaminated sites (NCPL): Unknown extent of contamination, rate of spread and/or environmental impacts on NCPL lands instead as 'Contaminated-Remediation Required'.	High	A. Review the lots and sub-lot risk ratings. B. Implement Sampling and Analysis C. Implement Soils and Material D. New Property Area E. Washdown pad	Environment and Heritage	Land and Seabed	
Management of NCPL Lease/ Licensed Areas within the NCPL port facility / Property	High	A. Develop and implement a site B. Hydrocarbon contaminated waste C. Waste Oil Disposal D. Washdown Degreasers E. Drainage well contamination F. Waste disposal practices	Environment and Heritage	Land and Seabed	
Invasive Species (Weeds): Unmanaged establishment of Priority Weed Species on NCPL lands.	Moderate	A. Implement NCPL Weed Management B. Seagulls C. Rats Treatments D. Cockroaches, carpenter ants, fleas, ticks' treatments pot cakes Spray, and Neuter rehome	Environment and Heritage	Flora & Fauna	

Objectives and Programs - IMSP Objectives, Targets and Program

The setting and reviewing of IMSP Objectives & Targets, is included in the Management Review. Adequate resources will be assigned to ensure satisfactory achievement of these objectives.					
ITEM	OBJECTIVE	TARGET	PROGRAM	RESPONSIBILITY	DEADLINE
EMMISSIONS TO AIR					
1	Reduce emmissions to air	Convert 100% of golf carts to solar powered.		Health & Safety/ Environmental Manager.	
2	Comply with NCPL Significant Environmental Risk Table Overview of NCPL Significant Environmental Risk and associated Risk Treatement Plan.				
WASTE					
3	Establish baseline for amount of generated waster for different categories(i.e. solid waster, hazardous waste, batteries, used oils) in order to establish achievable objectives.	Categorise waste items and identify method for tracking generated waste.			
EMISSIONS TO WATER					
4	Reduce the number of oil spill incidents.	Reduce the number of oil spills incidents 20%			
5	Eliminate liquid hydrocarbon discharges to the environment.	Zero liquid hydrocarbon discharges to the environment.			
6	Reduce overall consumption of fresh water.	Establish water usage.			
NATURAL RESOURCES USE REDUCTION					
7	Reduce electricity use.	Replace 100% light bulbs on site with LED lights.			
QUALITY					
8	Increase customer satisfaction.	Enhance communication protocol to clients.	Reach out to clients to identify their needs. Review and enhance customer communication.		