



Clean Green Program - World's Best Practice March 2016

BACKGROUND:

The Clean Green program is a world first Rock Lobster supply chain management strategy introduced in 2004 and is the industry vehicle to train and maintain the Southern Rock Lobster industry to world's best practice. The Clean Green program is an integrated 'pot to plate' Product Standard for vessel safety management system (SMS), work health & safety (WH&S), environmental management, food quality & safety and environmental sustainability with independent 3rd party auditing of practices. The program was developed by lobster fishermen in response to serious challenges to work practices, environmental legislation and food safety issues in the 1990's.

During 2014/15 Clean Green undertook a considerable revision of the components of the program that establish best practice standards for a fishing vessel Safety Management System (SMS) and WH&S i.e. work related tasks. The updating of the program was in response to the Australian Maritime Safety Authority (AMSA) introducing a National Standard for Commercial Vessels (NSCV) (Part E Operations) requiring all vessels to have an SMS. As well as the NSCV establishing minimum requirements for the safe operation of domestic commercial vessels the update to the Clean Green program also addressed additional WH&S legislative requirements that impact on fishing vessels and operations.

The key aim of the program is to demonstrate the industry is well organised and mature enough to address its responsibilities and interests through an industry-developed, owned, self-managed and independently audited, standards-based program in the key areas of:

- 1) Vessel SMS and On-Board WH&S - Specific to the risks of rock lobster fishing vessel operations and workplace risks and hazards.
- 2) Food Safety & Quality – Implementing Good manufacturing Practice (GMP) to ensure a premium live, healthy product across the supply chain.
- 3) Animal Welfare – This is important in itself and also important from an economic perspective since live and healthy rock lobsters achieve a premium price and it is a predominately live trade industry
- 4) Environmental Management - Negating and managing any potential impacts of fishing operations on the marine environment, including Threatened, Endangered and Protected species (TEPS).
- 5) Sustainable Management - Ensuring the wild rock lobster stocks are managed for long term sustainability through ongoing compliance with the *Environment Protection and Biodiversity Conservation (EPBC) Act 1999*. (SRL has commenced a process for Clean Green to be assessed against the Global Seafood Sustainability initiative benchmark)

BENEFITS OF THE PROGRAM:

- **AMSA Recognition**

All commercial vessels have a legal requirement to implement and maintain a Safety Management System (SMS). Southern Rocklobster Limited (SRL) after extensive engagement with AMSA have had Clean Green recognised as an equivalent means of complying with Part E operational safety (SMS) requirements. This means vessels compliant with Clean Green also meet AMSA's legal requirements for SMS. AMSA can take compliance action if your vessel doesn't have an SMS.



- **Addressing SafeWork Requirements**

The new National SafeWork Code requires all workplaces to have documented WH&S procedures. Some of these SafeWork conditions overlap with AMSA's Vessel SMS, but also take a broader look at the risks associated with the various work tasks (WH&S focus) performed on the vessel, not just the vessel's operational requirements.

SRL has addressed both AMSA's and SafeWork's requirements by developing a Standard setting out the legislative requirements. Then this is supported by a Hazard & Task Analysis and a Vessel SMS with documented procedures, checklists and control measures that also address WH&S - all tailored to suit the needs of individual vessels/fishing operations. All this is contained in the Clean Green On-Board Induction Manual that also documents other related SMS and WH&S related requirements such as Crew Safety Induction & Training plus Vessel Maintenance Checklists.

- **Financial Benefits:**

Clearly there is a financial benefit from being in Clean Green and remaining compliant with the program. The Clean Green program meets all SMS requirements including crew safety and induction training and associated record keeping. Those vessels not in Clean Green will be required to develop their own SMS and will need to satisfy themselves whether it meets AMSA requirements. The use of a consultant can be costly and does not necessarily mean you end up with an SMS tailored to your operation and that meets all of AMSA's requirements.

The South Australian Northern Zone Rock Lobster Fishery (SANZRLF) considered having a consultant develop an SMS/WH&S system, other than Clean Green, for the fishery - the cost estimate was six-figure sum. The SANZRLF have now fully adopted Clean Green.

- **Logbooks / Record Books**

All SMS and WH&S documentation requires forms of record keeping and recording of certain tasks – with Clean Green a log-book is provided. This is required to be filled in weekly and monthly in one section and when crew are inducted in another section as required. This may also be provided electronically to industry in the future.

- **Other Benefits**

JLT Insurance Brokers (Australian Insurance Brokers) have been offering a discount on vessel insurance to boats that are in Clean Green in recognition of the reduction in risk from participating in the program.

To participate in the Clean Green program skippers (also available to crew) need to attend a 2-day training course where all the required documentation is supplied. The training is one of the strengths of Clean Green as it starts everyone on the same page and is supported by a comprehensive On-Board Induction Manual that covers all the requirements of the program. First aid training is also required.

Importantly Clean Green is owned by Industry and demonstrates that Industry can manage itself and be self-regulating. All vessels in the program are required to undergo an independent audit within a 5-year cycle and this process is managed by SRL and undertaken by SAI-Global - costs are covered by the annual Clean Green Fee (\$350 in 2014/15 year).

BENEFITS OF THE PROGRAM (Future):

- **Building on the Benefits of the China-Australia Free Trade Agreement (ChAFTA)**

As more product starts to go direct into China through the benefits of the ChAFTA, guaranteeing food safety and quality will become a necessity. Clean Green provides standards for food quality and safety right from the point of harvest to end consumer.

- **Chain of Custody - Product Traceability and Country of Origin Labeling (COOL)**

Currently a R&D project to develop a 'Chain of Custody' traceability system has commenced through a SENSE-T project with U-TAS. Lobster from other countries is already being sold in China as 'Australian Lobster'. Clean Green provides the potential to brand Southern Rock Lobster through this traceability program that also address provenance (COOL) issues. Being able to isolate product for recalls through a traceability system in response to events such as algal blooms will also lessen the impacts on potential fishery closures. For example, if the algal bloom that closed Tasmanian waters in 2013 had occurred during the fishing season all states with product in the market would be impacted without some systems to isolate product based on tracing and isolating product harvested from specific areas even when it is in the marketplace.

ONGOING REQUIREMENTS TO BE IN CLEAN GREEN

Note all the following requirements are set out in the Clean Green On-Boat Induction Manual and the Log-Book.

- **Daily:**

Daily workplace safety checklist to follow

- **Weekly:**

Entries in log-book

- **Monthly:**

Entries in log-book

- **Annually:**

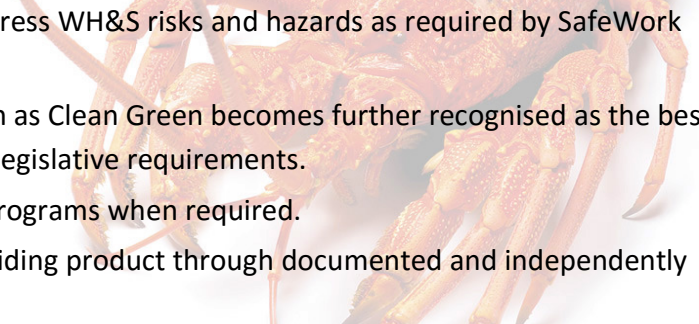
- Pay Clean Green Subscription (\$350 for 2014/15 year)
- Conduct Annual Drills and Safety Reviews
- Crew Safety Training and Induction
- Within a 4-5-year cycle undertake a Clean Green Audit with independent auditor.

TRAINING TO JOIN THE CLEAN GREEN PROGRAM

Training costs to join program can vary depending **if** subsidies are available. Without any subsidies the 2-day training course would cost approx \$1,200 (+gst) per skipper which also includes the Clean Green On-Board manual and undertaking a vessel pre-audit check. Where ever possible SRL makes an application for program or grant funding that provides subsidies to offset the total cost to attend Clean Green training and undertake the vessel pre-audit check.

PRESENT DISADVANTAGES FROM NOT BEING IN CLEAN GREEN

- Not working with a documented SMS that meets the obligations of owners and operators under the National Law

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- Not having documented procedures in place to address WH&S risks and hazards as required by SafeWork Authorities
 - Not already being trained to come into the program as Clean Green becomes further recognised as the best and most viable option to address WH&S and SMS legislative requirements.
 - The costs to implement alternative SMS & WH&S programs when required.
 - Future barrier to International Markets by not providing product through documented and independently audited 'Best Practice' program