



 **Ports Australia**



The Australian Port Marine Safety Management Guidelines

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Photo courtesy of Port Authority of NSW.



INTRODUCTION

The aim of the Port Marine Safety Management Guidelines for Australian Ports (the Guidelines) is to promote good practice in the conduct of safe marine operations. They provide a framework which ports in Australia may choose to use as a guide.

They encourage the use of a systemised procedure for evaluating risks inherent in port marine operations, and suggest ways to address and minimise those risks.

The Guidelines are not law. They are designed to provide guidance on good practice and to outline a template against which the policies, procedures and performance of port marine operational practice may be measured. They are also designed to encourage clarity for governance arrangements and accountability.

The Guidelines do not supersede or overwrite any regulatory obligations ports may have under a national, state, territory or local jurisdiction.

The Guidelines are designed to serve as a framework for a port's marine safety management system (PMSMS). This will be a part of, but separate from, the overarching Work/Occupational Health and Safety Port or Business Safety Management System (SMS). The PMSMS should be part of the overall SMS but be designed to focus specifically on those port marine activities and operations mainly undertaken in the waters of a port by vessels.

The PMSMS will be informed by and based upon a due diligence process and a formal assessment of risks. The relevance of due diligence will be discussed further in these Guidelines.

As a component of the port's overall safety management system, the objective of the PMSMS should be to establish protocols and procedures, covering all of the marine operations of a port, which ensure that risks are minimised and opportunities to prevent the occurrence and recurrence of incidents are maximised.

The main aim of these Guidelines is to provide guidance on good practice for the safe management of vessels in Australian ports, focussing on the prevention of human injury or loss of life and including the avoidance of damage to the marine and associated terrestrial environment, property and infrastructure.

Adopting and implementing the Guidelines could form part of a defence action in court, if necessary.

Legal Background

Due to the various statutory regimes regulating the safety of Australian ports, it is not practical to list the legislation relevant to all ports within the country. Rather, the Guidelines provide guidance and examples, where applicable, highlighting the relevant regulatory areas which might be considered in order to provide for the safe conduct of marine operations within ports.

Functions to Which the Guidelines Apply

The Guidelines are concerned with port responsibilities for port marine safety and do not attempt to cover all of the duties and responsibilities of a port, or even all of their safety responsibilities. It is expected that the overall port or business Safety Management System (SMS) will contain the PMSMS and that the overall port SMS will address the generic WHS/OHS risks associated with the business.

Responsibility for Port Safety

The Guidelines refer to some of the existing legal duties and powers that affect ports in relation to marine safety, but the document does not – in itself – create any new legal duties. There are, however, several additional measures which, although not mandatory under legislation, are key to its successful implementation. In order to warrant recognition of good practice therefore, ports should:

- be aware of their existing powers and duties;
- develop an effective PMSMS, which employs a formal assessment of risks, framed by due diligence procedures;
- employ people who are competent and qualified for the positions they hold;
- maintain a comprehensive operational safety plan, which is regularly assessed for performance.

Due to the varying models used to regulate and manage port marine safety in the different Australian states and territory, it is

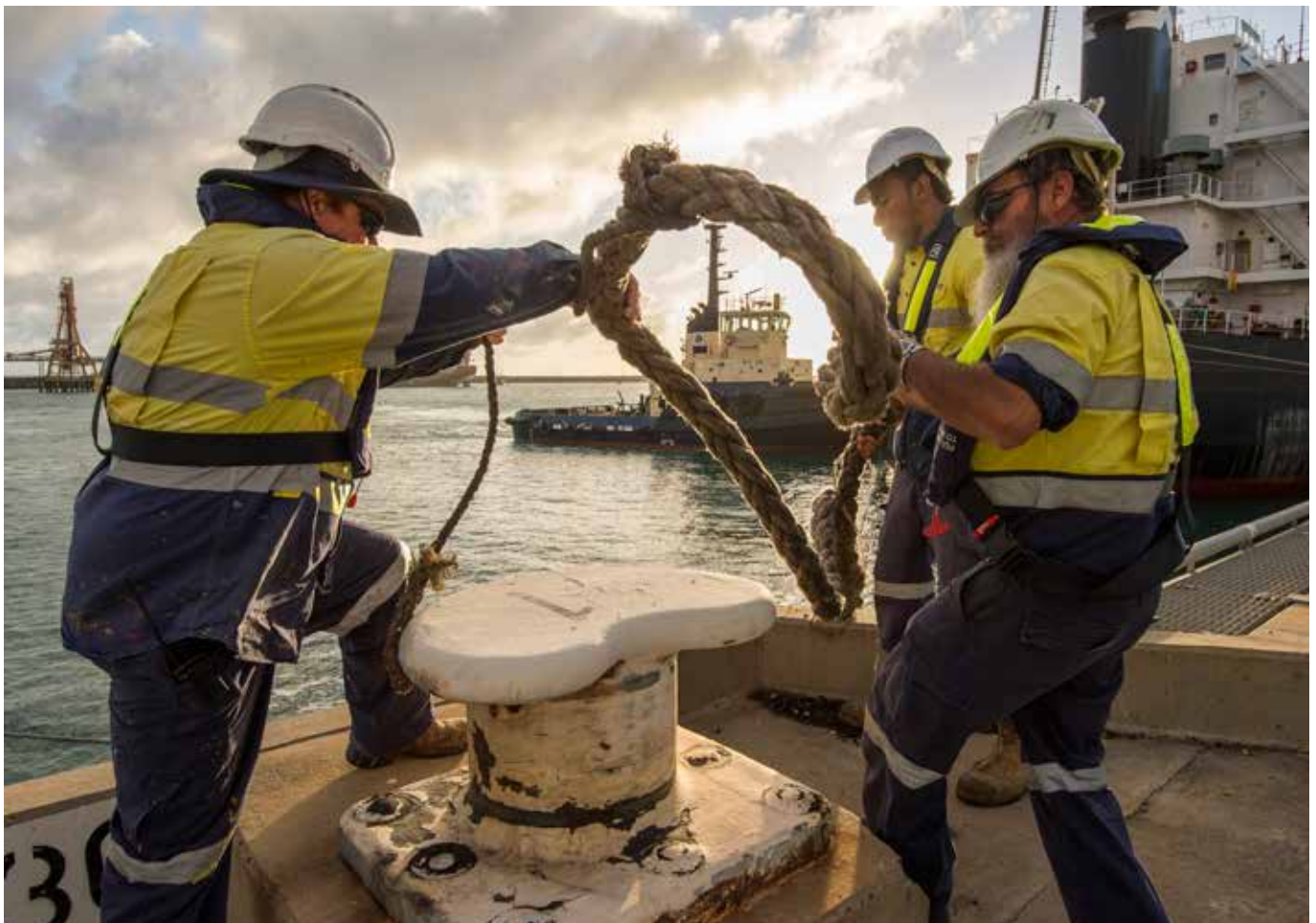


Photo courtesy of North Queensland Bulk Ports.

recommended that ports detail the applicable legislation regulating the safety of navigation and conduct of port marine operations within their PMSMS. This should include details of the entities and regulatory bodies which are responsible for the following aspects of marine and navigational safety:

- establish maritime rules relating to aspects such as pilotage, safe navigational maritime operational procedures and port control or vessel traffic services (VTS);
- provide guidance for the safe management of commercial shipping movements;
- provide guidance for the safe operation of recreational boating, where applicable;
- regulate the conduct of vessels;
- regulate relevant on-water events;
- establish and maintain aids to navigation;
- monitor and remove obstructions and impediments to navigation; and
- execute and maintain works to improve navigation.

Risk Assessment and Due Diligence

These Guidelines recommend that ports undertake a formal assessment of risks and engage in a comprehensive due diligence process for all marine operations conducted within port limits. Risk assessment refers to the overall process of risk identification, risk analysis and risk treatment. Due diligence refers to another level of safety management and may assist where judicial liability is a factor. Due diligence and formal risk assessment are related but are different approaches to achieving good port marine safety outcomes.

The traditional, hazard based way to address risk is to:

- identify the hazard;
- characterise the risk;
- define acceptable risk criteria; and
- implement controls to achieve these criteria.

This formal risk assessment approach, even though in line with ISO 31000:2009 Risk Management Principles and Guidelines may not always satisfy common law judicial scrutiny, especially for high consequence low likelihood events. If a precautionary, due diligence approach is also followed, not only will risks be reduced to As Low

As Reasonably Practicable (ALARP) but also be reduced So Far As Is Reasonably Practicable (SFAIRP). This is a subtle but important difference.

This due diligence approach is the method used in Commonwealth model WHS legislation. Though the model legislation has not been adopted by all states and territory it is recommended that the due diligence approach be used in setting up the PMSMS to assist in satisfying legal liability concerns.

A formal port marine risk assessment complemented by due diligence will ensure that a port possesses a detailed understanding of its marine operational risks, their causes, consequences and the likelihood of those risks arising. This assessment of risks will inform decisions regarding whether and how an activity should be undertaken, and how risks need to be controlled. It will help to prioritise risk control measures and determine the most appropriate selection of strategies that will minimise risks.

Risk assessments and due diligence examinations should be re-assessed regularly and updated. In addition to past events and incidents, risk assessments and due diligence should also examine potential dangers and means of avoiding or managing them. Incidents should be systematically documented and analysed in order to support future assessment processes. The PMSMS should describe how identified risks are to be managed and controlled and by whom.

Key Measures Needed for Compliance with these Guidelines by a PMSMS

Setting the Compliance Framework

The following general principles should be applied:

- the PMSMS should be aligned with existing powers and duties under local, national and international legislation;
- it should be based on a formal assessment of port marine safety risks and due diligence process;
- the PMSMS should be established through consultation, to manage and minimise port marine safety risks;
- the PMSMS should employ competent and qualified personnel for navigational and marine operations, ensuring roles are clearly defined; and
- the PMSMS should be monitored, reviewed and externally audited on a regular basis.

Using These Guidelines

The effectiveness of these Guidelines will depend upon the degree of compliance with them. There should be a formal assessment of risks and a logical due diligence process undertaken to identify and control risks. The PMSMS should include:

- the means for the effective control of vessel movements in port waters;
- mechanisms in place to check that there are appropriate standards of qualification and training for all those involved in the management and execution of port marine services;
- systems to manage the identified risks and the means by which these systems can be effectively operated;
- standards to be measured using appropriate metrics; and
- a procedure for auditing.

Review, Awareness and Compliance with Duties and Powers

The PMSMS should outline the port's powers and responsibilities based upon local, state, territory and national legislation. The system should include details of those powers and responsibilities, demonstrating how they will be enforced and how evidence that adequate resources have been made available for that purpose will be obtained.

Continuous Assessment and Review

The PMSMS should be reviewed regularly, as determined by the formal assessment of risks and, in any event, in order to avoid a failure in discharging its duties or risk exceeding its powers, reviews of the entire safety management system should be undertaken at appropriate intervals, normally every 3 years, demonstrating how compliance is being achieved and continuous improvement is being sought.

In addition to periodic reviews, extra reviews of each element may be required, particularly in those instances where there have been incidents, changes to relevant legislation, or where a change in process or business profile warrants a review.

The performance of the PMSMS should be assessed by internal reference to indicators and additionally, where possible and appropriate, by external comparison with the performance of other examples of good practice.

One of the key elements of assessing performance is consultation with those likely to be involved in, or affected by, the port's PMSMS. To provide for appropriate levels of consultation, ports should seriously consider the establishment of a Port Marine Safety Committee whereby all port marine stakeholders regularly meet to consider and review port marine safety issues within the port area. These stakeholders could be taken from a broad cross section of port users and port businesses or organisations.

Competence Standards

Roles should be clearly defined and personnel performing key roles in the PMSMS should be trained to national, state or territory agreed standards, where they exist, and be assessed as competent for that role. The Guidelines are based upon the principle that ensuring port marine safety is a team-based operation which demands the appreciation of the work of other specialists.

Ports should adopt a training strategy that develops a shared understanding of their PMSMS. The adopted training strategy should be developed with consideration given to the formal assessment of risks and due diligence process. The training should ensure all staff involved in the safety of port marine operations have an understanding of the PMSMS and their role within it.

General Duties and Powers

Health and Safety Duties

Every employer has a legal obligation to ensure the health and safety of its employees while in the workplace. Under the National Model Work Health and Safety Act 2011 a duty is imposed on employers to ensure that risks to health and safety are eliminated or minimised so far as reasonably practicable.

The work or occupational health and safety legislation currently (2015) relevant to each state and territory is as follows:

NSW	Work Health and Safety Act 2011
NT	Work Health and Safety Act 2011
QLD	Work Health and Safety Act 2011
SA	Work Health and Safety Act 2012
TAS	Work Health and Safety Act and Regulations 2012
VIC	Occupational Health and Safety Act 2004
WA	Occupational Safety and Health Act 1984

Port Management and Maintenance Duties

A PMSMS should outline the port's duties and obligations for the management and maintenance of port operational activities. The following elements should be amongst those considered,

- managing and maintaining the port with regard to its use and the type and the size of vessels that use it;
- keeping proper hydrographic and hydrological records;
- ensuring public notification or distribution of supplementary navigational guidance as clearly and widely as is appropriate;
- communicating appropriate warnings to port users if hydrographic and hydrological information is not current;
- providing adequate information about the condition of the port as determined by the port's assessment of risks to enable users to identify whether it is the right fit for their intended use;
- providing port users with adequate information about conditions relating to port facilities and ensuring the provision of suitable port related aids to navigation;
- outlining powers in relation to wrecks;
- outlining the responsibilities in relation to arrested vessels;
- providing for a place of refuge, if requested;
- outlining the duty to find, monitor and maintain the appropriate navigable channel or channels in the port where risk assessment demonstrates this is required;
- the provision of pilotage; and
- the provision of VTS or port control services.

Environmental Duty

A PMSMS should detail the environmental duties of the port including reference to any relevant legislation.

Regulations

A PMSMS system should detail which entity has the responsibility for making regulations in regard to navigational safety where this is relevant.

Specific Duties and Powers

A PMSMS should detail the port's specific duties and powers. This may include legislation that covers the following elements.

Accountability for Port Marine Safety Management

The PMSMS should include advice regarding the extent of the powers, accountability and the obligations of the port's regulatory and management structure. Those responsible for safety management in a port should familiarise themselves with the extent of their legal powers, obligations and accountability, including those set out in general and local legislation, regulations and directions.

Organisational Responsibility and Accountability

A PMSMS should also include the organisational responsibility and accountability structures for port marine safety management within the port.

It might also detail the mechanisms necessary to:

- discharge the duties and exercise the powers given, both directly and by delegation;
- ensure that adequate financial, material and personnel resources are available;
- seek and adopt appropriate powers for the effective enforcement of procedures identified under the requirements of these Guidelines;
- approve the strategy, policies, plans and budgets together with strategic objectives; and
- review performance against strategic and operational objectives, plans and budgets.

The relevant (safety management) functions of committees and subcommittees or other consultative groups might also be included.

Individual Responsibility and Accountability

The PMSMS should include a statement and diagram detailing the port marine safety management functions of the personnel or departments identified in the management structure.

Pilotage

A PMSMS should include details of the pilotage processes and requirements in place and how these relate to the legislation regulating pilotage. The minimum requirement for pilotage should be based upon the relevant commonwealth, state or territory legislation, however, the outcomes of the assessment of risks may warrant levels of pilotage which exceed the compulsory pilotage standards, for example, for specific vessel types and berths. The following general principles apply.

Assessing the Need

An assessment should be made by the pilotage authority to establish whether pilotage should be compulsory for vessels navigating in any part of the port or its approaches and, if so, for which vessels and in which circumstances and what pilotage services need to be provided for those vessels. This is to be determined in accordance with transparent risk management principles. Pilotage should be routinely reviewed and following any relevant incidents.



Photo courtesy of Port Authority of NSW.

Providing the Service

Pilotage service providers must meet the requirements of applicable legislation. Where separate, the pilotage service provider must liaise with the pilotage authority to ensure pilotage services are fully integrated into the port's PMSMS. The pilot service provider must ensure the service is properly managed and take all reasonable steps to ensure a safe service is provided.

Authorisation and Training

Providers of pilotage services should ensure that all their licensed pilots are trained so as to be competent to conduct the vessels to which they are assigned. Every licensed pilot's training should be kept under review to take account of different types of vessels or conditions in the ports for which they are licensed.

Details of the process to suspend or revoke a licence if it appears that the authorised person is guilty of incompetence or misconduct affecting their capability as a pilot, or has ceased to have the required qualifications – or failed to provide evidence that they still have them – should also be included within a port's safety management system.

Boarding and Landing Procedures

A port's PMSMS should be used to identify, where practicable, safe pilot boarding and disembarkation areas. Every PMSMS should incorporate the requirements of the relevant standards. Pilotage service providers should take steps to ensure that pilots do not board or land from vessels in conditions contrary to these requirements.

Allocating Pilots

Pilotage service providers should ensure that pilots are allocated in adequate time to prepare passage plans. Pilotage authorities should ensure that pilotage service providers implement a PMSMS, ensuring that pilots comply with its provisions.

Pilotage Exemption

A person may apply to the pilotage organisation for a pilotage exemption certificate if so permitted under the applicable legislation.

Pilotage Safety Management System

Pilotage service providers should be encouraged to develop a Pilotage Safety Management System to run under and in parallel with the PMSMS.

Use of Tugs

While any contract for the use of tugs is formally for the master of a vessel, the use of harbour tugs is one of the principal and most direct means applicable to control risks.

The port authority or corporation should determine the requirements for the use of tugs for berthing, un-berthing and escorting. If a master or pilot does not believe it appropriate to follow the standard operating procedures, the port authority or corporation should be consulted for special directions. Any potential disagreements should be accounted for in the development of standard towage operating procedures. Where tugs are provided by a service provider outside of the port, the service should be fully integrated into the PMSMS.

Berthing

Powers in relation to the regulation of berthing should be exercised having regard to the PMSMS. Ports should develop standard berthing plans containing minimum agreed requirements following consultation with affected parties. Ports should also ensure that berthing parties meet appropriate competence standards and have access to appropriate training.

Port Control and Vessel Traffic Services

The formal risk assessment for the PMSMS should indicate how port vessel traffic control should be undertaken, whether by providing a formal VTS in accordance with the Australian Maritime Safety Authority's Marine Order 64, or by a more basic harbour control set up.

The provision of port control should in any case as far as possible be based upon the standards of the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) and the outcomes of the formal assessment of risks. The methods used to monitor and communicate with vessels using the port should allow appropriate information, advice and recommendations to be passed between the port control/VTS and vessels in the port.

Personnel who communicate with vessels may be considered to fall within the international definition of a Vessel Traffic Services Operator as developed by IALA of which Australia is a national member. Training requirements should take into account the nature of their role and international standards for Vessel Traffic Service Operators.



Photo courtesy of Pilbara Ports Authority.



Photo courtesy of Port Authority of NSW.

Aids to Navigation

Ports should provide aids to navigation in accordance with their PMSMS reflecting the regulations for the provision of aids to navigation including the erection, alteration, removal, performance (in accordance with IALA standards) and inspection of navigational aids. The provision and level of aids provided should be based upon a formal assessment of navigational risks and the characteristics of aids and their availability should comply with internationally agreed guidelines. A planned maintenance program for navigational lights should also be determined in accordance with the risk assessment and records kept of maintenance undertaken. The procedures by which the port is notified of navigational aid failure and actions taken to rectify these should also be included.

Hydrography

Identifying the extent and frequency of which hydrographic surveying should be undertaken is an essential component of a formal assessment of navigational risks. Included in a PMSMS should be a statement of the measures adopted for the purpose of hydrographic surveying. The Harbour Master should have primary responsibility for ensuring these are undertaken, where possible, and in any case be responsible for the promulgation of depths and safe under keel clearances. Where ports do not have a Harbour Master designated, the person or organisation carrying out the recognised Harbour Master duties should be responsible.

Effective arrangements should be in place to make available appropriate hydrographic information, including sounding plans, charts (if produced) and supplementary information, particularly navigation notices and warnings on recently identified navigational hazards such as reductions in the depth of water. Close and effective liaison with the Australian Hydrographic Service with regards to data and information sharing should be seen as an integral aspect of the port hydrographic function.

Ports should ensure that national standards and guidelines regarding hydrographic information are adopted where possible.

The need for additional hydrographic surveys should always be considered if port operations are changed, for example, the use of berths, the reception of larger vessels, the presence of major dredging operations, and also significant increases in port traffic which may require changes in operations and/or additional area. The frequency of hydrographic surveys should also be based on environmental considerations and experience gained on previous surveys particularly in relation to silt or debris deposition and significant weather events, such as cyclones and/or flooding.

Dangerous Goods

Coverage of dangerous goods matters in the PMSMS should include reference to international, national and state or territory law. Key elements for consideration when managing dangerous goods include:

- notification requirements for dangerous cargo shipments;
- general requirements and procedures for the safe handling of dangerous cargoes;
- storage requirements;
- segregating incompatible products;
- time constraints for products kept on the wharf;
- emergency response procedures; and
- management systems to cover aspects such as training and communication.

Additional Responsibilities

Emergency Planning

A PMSMS should include preparations for emergencies which have been identified as potentially occurring. Emergency plans and procedures should be regularly reviewed, drilled and exercised. External response agencies could be included in drills and exercise, the frequency of which would be based on the formal assessment of risks.

Prevention of Pollution and Incidents Threatening Pollution

The PMSMS should include details of the applicable legislation regulating the prevention of pollution of the marine environment within the port area and actions to be taken, and by whom, in the event of a marine pollution incident.

Incident Investigation

However effective the safety management regime is, marine incidents do occur. Such incidents may involve death, serious injury, pollution and other undesirable outcomes and they may involve breaches of national or local laws.

Investigations of marine incidents have two essential purposes – to determine the cause of the incident with a view to preventing a recurrence of that incident (or similar), and to determine if an offence has been committed. As a result of the investigation, there may be the need to initiate enforcement action that may lead to prosecution by the port in its own right or through an agency of another authority.

It is therefore essential that the PMSMS addresses the potential for incidents to occur and provides instruction and guidance on any investigations and enforcement actions that may be required as a result.

Prevailing Conditions

In addition to information about general hydrographical conditions, the Harbour Master should ensure that procedures are in place to make available to users timely information on prevailing and forecast meteorological conditions. Information may include wind, tide, wave height and other factors liable to be affected by the weather and the way the port is used.

Anchorage

Where applicable, safe anchorages in the port should be publicized and the port's approaches should be identified. The location and use of the anchorages should be regularly reviewed, taking account of the size and types of vessels likely to require them and the local conditions.

Wrecks

Ports should assess the risks presented by any wreck in, or near the approaches to the port. Any powers a port possesses to raise, remove, destroy and mark a wreck which is, or is likely to become, a hazard to navigation should be exercised having regard to the applicable legislation.

Arrested Vessels

Ports should assess the risks presented by the presence of arrested vessels in the port, either at a berth or in port waters. Close liaison with the Admiralty Marshals of the Federal and Supreme Courts is required to ensure that all of the Court's directions are followed and the vessel in question does not depart port until clearance is provided in accordance with orders from the Court.

Places of Refuge

In the event of a ship being in distress outside port limits, ports should have a copy of the latest version of AMSA's National Maritime Places of Refuge – Risk Assessment Guideline which will assist ports together with the Commonwealth, states and territory to inform and expedite the decision-making process in determining and allocating an appropriate place of refuge for the vessel. The Place of Refuge Guidelines are:

- voluntary
- flexible to take into account the wide variety of circumstances that might arise;
- allow for case-by-case analysis and application; and
- seek to enhance a cooperative and consensus approach between all parties.

Works in Ports

As works within port limits have the potential to interfere with navigation, the PMSMS should make appropriate provision for this, should works be undertaken. There will be a need for a special assessment in each case where new risks are likely to arise. A PMSMS should make provision for dredges and other craft associated with such works.

Directions and Passage Plans

The powers which the port authority or corporation possesses (under the relevant legislation) to regulate the time and manner of vessels entry to, departure from and movement within their waters serve to complement port passage planning and should be included in the PMSMS.

Scope of Passage Planning Requirements

The use of passage planning is not confined to vessels conducted by a pilot but should also be required for vessels conducted by the user of a pilotage exemption certificate and on vessels excluded from a port authority's or corporation's pilotage requirements.

The objectives of port passage guidance as required by these Guidelines are to ensure that:

- affected parties know relevant details of any particular port passage in advance;
- there is a clear, shared understanding of potential risks, margins of safety and the vessel's characteristics; and
- intentions and required actions are agreed for the conduct of the port passage – including the use of tugs and their availability – and any significant deviation should it become necessary.

The primary responsibility for ensuring passage planning is effective lies with the pilotage authority. General guidance should be established. In simple cases, for any entry to the port, whilst in others, guidance might be elaborated for particular berths, vessel sizes, cargoes, conditions, tidal constraints, tug allocation and waiting areas. Particular attention should be paid to critical port movements, for example, the movement of deep draught vessels to particular berths.

Passage plans are subject to change, thus it is important not to constrain a master's or pilot's need to react to unforeseen circumstances. Deviations from the agreed plan should be discussed with the master and, when relevant, with the vessel traffic services and recorded with justification.

Plans adopted for particular passages shall be recorded, ideally on the chart or other record plan. Passage plans must be retained in case they are needed for incident investigation purposes.

Ports should ensure up to date guidance or general plans adopted by the port or the local pilotage provider are published and reviewed regularly.

Fixed Infrastructure

Fixed infrastructure which has the potential to impact upon marine and navigational safety should also be included in the formal assessment of risks and the PMSMS. The condition of berths, fenders and bollards should also be included, and inspection and maintenance or replacement programs considered. Critical infrastructure within the port should be identified and precautions to conserve such infrastructure stated within the PMSMS.

Safety Management System

The main objectives of a successful PMSMS are to provide assurance that risks have been identified and evaluated and that suitable controls are in place to manage those risks and that there is designated responsibility for those tasks that ensure controls are effective at all times.

In developing, implementing and maintaining a PMSMS consideration should be given to ensuring that the system incorporates safety policies and procedures to:

- ensure there is proper control of ship movements by regulating the safe arrival, departure and movement within the port of all vessels;
- protect the general public from dangers arising from marine activities within the port;
- carry out functions with special regard to the possible environmental impact; and
- prevent acts or omissions that may cause personal injury to employees or others.



Photo courtesy of Southern Ports Authority (Albany).

It should also:

- confirm the roles and responsibilities of key port personnel;
- outline present procedures for port marine safety within the port;
- measure performance against targets;
- refer to emergency plans that would need to be exercised; and
- include an appropriate schedule of audit.

The Port Marine Safety Policy

Within the PMSMS a port safety policy should be developed in consultation with the relevant stakeholders and a statement of the policy set out at the beginning of the document. The policy should make a commitment to these Guidelines and to the conduct of marine operations in such a way that safeguards the port, its users, the community and the environment. The policy should make a commitment to the following:

- use of the Guidelines and its supporting documents as a means by which the port will measure itself;
- ensuring that the relevant assets of the port are managed safely and efficiently;
- ensuring the awareness and periodic review of existing powers and duties based upon local, national and international legislation;
- ensuring the provision of adequate resources for the management of marine safety; and
- ensuring that personnel involved in marine safety management are adequately trained for such responsibilities and for emergencies and contingencies.

The safety policy should promote a positive safety culture, fostered by the visible and active leadership of senior management. It should include provisions for the motivation and empowerment of staff to work safely rather than merely avoiding incidents. Furthermore, it should be underpinned by effective staff involvement and participation and sustained by effective communication and promotion of competence.

A statement about the port's safety performance should be included in an annual report.

An example of a Port Marine Safety Policy Statement is shown below.

This Safety Management System is established in accordance with the recommendations of the Australian Port Marine Safety Management Guidelines.

The purpose of this Port Marine Safety Management System is to improve the level of safety for everyone using the waters of XXXXXX Port.

The XXXXXX Port Marine Safety Management System (PMSMS) is developed around 6 main headings:

Background and Scope

Policy Setting

Staff Organisation

Procedures

Monitoring and Measuring Performance

Audit and review

The application of the PMSMS will be the responsibility of the port authority or corporation and all port stakeholders. This PMSMS is a living document that will be regularly reviewed to ensure that it remains fit for purpose and relevant. It is designed to be used as a tool to improve safety in the port. It will be openly available for public use, consultation, comment and suggested improvements.

The PMSMS will also be used to aid the recording and collation of data which will be used over time to continuously update the analysis of risk within the port and so improve its safety profile.

Our Goal: SAFER PORTS FOR ALL



Photo courtesy of Southern Ports Authority (Albany).



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