



Responsible Cargo Carriage Policy

As a socially and environmentally responsible company, The China Navigation Company Pte Limited and/or its group companies and/or subsidiaries (“CNCo”) is committed to taking a more sustainable development path for ourselves and future generations. We recognise the importance of conserving, and where possible enhancing, species diversity and that we have a responsibility not to facilitate trade in any flora or fauna or their produce that may threaten the sustainability of any species.

To achieve this we adopt this policy.

1. We will comply at all times with relevant international and national regulatory requirements.
2. In respect of the carriage of flora and fauna cargo, the relevant international legislative instruments are primarily “The Convention on International Trade in Endangered Species of Wild Fauna and Flora”^[1] (the ‘CITES’ Convention), (1973) as amended in Bonn and Gaborone, together with “The Convention on Biological Diversity”^[2] (the ‘CBD’ Convention) (1992), and including the Cartagena Protocol on Biosafety (2000) to the CBD Convention. In seeking to act responsibly, CNCo has determined that it will only carry flora and fauna cargo in full compliance with the CITES and CBD Conventions and their Annexes, Amendments and Protocols

Additionally we will seek to support the outcomes of the current development of an international legally-binding instrument under the United Nations Convention on the Law of the Sea on the conservation and sustainable use of marine biological diversity of Areas Beyond National Jurisdiction.

3. CNCo supports the “United for Wildlife” International Taskforce on the transportation of illegal wildlife products, recognising the devastating impact of illegal wildlife trade, and will not knowingly facilitate or tolerate the carriage of illegal wildlife products, or game or hunting trophies (including legally hunted or legally acquired trophies).

Further, CNCo will notify relevant law enforcement authorities of cargoes suspected of containing illegal wildlife and their products. We will also support the development of mechanisms by the World Customs Organisation and national customs authorities to aid the detection and prevention of trade in illegal wildlife and their products.

Wildlife traffickers regularly use companies legally owned by and registered to a third party but beneficially controlled by wildlife trafficking networks or their facilitators. These ‘front’ companies provide wildlife traffickers with a means to obscure the true beneficiaries of illicit shipments of wildlife, reduce risk of detection, and enable greater operational flexibility.

We will thus do the due diligence on the companies to the extent that is operationally possible, and if in doubt, will not accept the shipment.



In particular, we will closely scrutinise:

- Companies owned by or registered to individuals with no previous international trading background.
- Shipments in which the declared counterparty is newly registered or has no apparent background in or knowledge of relevant lines of business.
- Shipments in which relevant counterparty and payment details are illogical or anomalous.
- Companies with apparent connections to known wildlife trafficking suspects.

4. Additionally, we will not carry:

- any live animals where the treatment of the animals at the origin or destination, or the fact of the carriage itself, is not in accordance with international best practice.
- any live wild animals unless they are transported within the scope of a recognised wildlife conservation/preservation program or consigned to a zoological garden, a national park/reserve, a government wildlife agency or an approved animals care centre.
- any live carry animals destined to be used for laboratory research.

5. We will not knowingly accept shipments of unsustainably caught seafood, as detailed in the Swire Pacific Sustainable Food Policy^[3] and/or seafood from illegal, unregulated, or unreported (IUU) fisheries or shipments of any cetacean, whale or shark products. We will engage with stakeholders with the ultimate goal of only accepting seafood shipments that are certified by the Marine Stewardship Council^[4.1] ('MSC') or the Aquaculture Stewardship Council (ASC)^[4.2].

6. We recognise the importance of forests in reducing the effects of man-induced Global Warming and support Sustainable Forest Management (SFM)^[5]. Accordingly CNCo will only carry forest products, (and the machinery to support the management of such forests) that have been independently certified under the following (or equivalent) certification programmes:

- Programme for the Endorsement of Forest Certification^[6] ('PEFC')

and/or

- Forest Stewardship Council^[7] ('FSC')

and/or

- Any national forestry certification schemes (e.g. China Forest Certification Scheme ('CFCS') or 'SVLK' in Indonesia)



7. We will not carry waste materials of any type across international borders unless the carriage, including documentation, is fully compliant with “The Basel Convention on the Control of Trans-boundary Movements of Hazardous Wastes and Their Disposal”^[8] (1989), (the “Basel Convention”) and “The Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter”^[9], (the “London Convention”) (1972).
8. We will not carry arms, munitions and military equipment from, via, to or on behalf of any UN Member State or States where the international transfer of armaments is not reported to the “United Nations Register of Conventional Arms”^[10], maintained by the United Nations Office on Disarmament Affairs (“UNODA”). For clarity, this provision does not include the international movement of military equipment solely to facilitate training purposes.
9. We will not carry ivory of any kind, raw or worked.
10. We will base our cargo acceptance policy on the above principles and in so doing take account of current external, science and research-based input and good international practice. We understand that research will be on-going and the determination of good practice is a dynamic process and hence this policy will evolve over time.
11. We recognise that any policy is only as good as it is practicable and enforceable and we will engage with our customers and agencies to ensure that this policy is understood and supported.
12. We support an industry approach to global issues of enhancing species sustainability and live animal carriage and will work with industry bodies and NGOs to encourage a practical and responsible approach to promote sustainability.

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References

1. <http://www.cites.org/eng/disc/text.php>
2. <http://www.cbd.int/convention/text>
3. http://www.chinnav.com/images/stories/article/sustainableDevelopment/Swire%20Pacific%20Policies%20-%20Sustainable%20Foods_Final%208Dec11.pdf
- 4.1 <http://www.msc.org>
- 4.2 <http://www.asc-aqua.org/index.cfm?act=tekst.item&iid=365&iids=610&lng=1>
- 5 http://en.wikipedia.org/wiki/Sustainable_forest_management
- 6 <http://www.pefc.org/about-pefc/overview>
- 7 <http://www.fsc.org/vision-mission.12.htm>
- 8 <http://www.basel.int/TheConvention/Overview/TextoftheConvention/tabid/1275/Default.aspx>
- 9 <http://www.imo.org/OurWork/Environment/SpecialProgrammesAndInitiatives/Pages/London-Convention-and-Protocol.aspx>
- 10 <https://www.un.org/disarmament/convarms/register>