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1. NAVIGATIONAL SAFETY MANAGEMENT SYSTEM PRINCIPLES

The Isles of Scilly Navigational Safety Management System (Navigational SMS) is based on principles embodied in guidance published by the Health and Safety Executive, and is designed to deliver the relevant requirements of the Port Marine Safety Code (PMSC).

The Duchy’s Navigational Safety Policy and complementary Marine Policies define the organisation and arrangements that the St Mary’s Harbour Authority has established to monitor and manage the conduct of navigation.

Figure 1 shows the links between Policy, organisational structure and administration of the Navigational Safety Management System.
2. INTRODUCTION

The provisions for the Navigational SMS are set out in this manual. The purpose of this document is to describe the overall framework for the management and co-ordination of marine activities necessary for navigational safety. The Navigational SMS arrangements referred to in this manual comply with the updated (2009) Port Marine Safety Code.

The Harbour Executive Committee (HExCo) is responsible for maintaining the design, overall content and subsequent management of the Navigational SMS. The Duty Holder (Isle of Scilly Land Steward) is responsible for approval of arrangements made to its satisfaction. HExCo is ‘the board’ for the purposes of the Navigational Safety Management System.

2.1 Port Marine Safety Code Requirements.

Navigational SMS procedures and guidelines fulfil the requirements of the Port Marine Safety Code including, but not limited to the following:

- Making risk control the basis of all marine activities, procedures and regulations applied to, or required by port users.
- Using risk assessment to identify the requirements for navigational aids.
- Applying risk assessment to all Harbour works.
- Maintaining systems to implement the findings of risk assessments.
- Identifying and designating safe Pilot boarding and landing areas.
- Applying and adhering to current Pilot Transfer arrangement regulations.
- Reporting deficiencies on visiting vessels.
- Providing procedural advice for giving Directions in relation to dangerous vessels or substances.
- Maintaining appropriate plans and procedures for emergency response and associated training and exercises.
- Using verification and audit systems.

The Duchy of Cornwall will undertake a formal review of how it meets the requirements of the Port Marine Safety Code every three years.
2.2 System Components

The Duchy’s Navigational Safety Management System focuses on:

- Harbour Operations
- Pilotage

It includes the following components:

- Policies
- Navigational SMS Manual
- Risk Assessment and Risk Control Measures
- Hazard Management
- Incident recording
- Rolling SMS Action Plan
- Consultation
- Audit and Review
3. POLICY

The Navigational Safety Policy sets out the Duchy’s intentions and commitment to safety. It also describes the organisational responsibilities and arrangements established to ensure that the Policy is implemented. The Policies contribute to operational objectives and state that the St Mary’s Authority commitment to meet its legislative responsibilities. The fundamental objective of the Navigational SMS is to demonstrate the consistent application of these policies.

3.1 Policy Development and Communication.

The Navigational Safety and Marine Policies are approved by the Board. Policies have been communicated to staff, harbour users and external stakeholders. In addition, the Duchy has developed a consultation Policy, the application of which will further aid the development of the navigational SMS, the involvement of all port users and stakeholders, and contribute to compliance with the Port Marine Safety Code. The policy, also approved by the Board, is attached below.

Copies of all Navigational Safety and Marine Policies are freely available to all and there is a continuing process of briefing and updating information with regard to navigational safety.

3.2 Commitment Statement

The Land Steward, as ‘Duty Holder’ and the person with ultimate responsibility, is committed to comply with the requirements of the Port Marine Safety Code. Furthermore the Duty Holder is committed to ensuring that adequate resources are available to discharge its navigational safety obligations.

One purpose of this document is to show a link between the policies set by the Board and the management arrangements, controls and that discharge those policies.

3.3 Consultation and Communication

Feedback from both staff and harbour provides a vital Navigational SMS component. All are actively encouraged to be involved in the management of navigational safety. This includes input into the development and implementation of the Navigational SMS and its operational risk management controls.

Examples of consultation, involvement and communication employed by the Duchy in the maintenance of the Navigational SMS include:

- The Harbour Users Group (Harbour Stakeholders)
- The Harbour Forum (Public Meeting)
- Navigational Advisory Panel (Senior Pilot & HM)
4. ORGANISATION

4.1 Functional Structure for the Management of Navigational Safety.

4.2 Responsibilities

4.2.1 The Board

For the purpose of implementation of the Port Marine Safety Code, ‘the Board’ collectively comprises the decision-making committees of the Duchy of Cornwall.

In respect of Navigational Safety, the Board:

- Discharges the duties and exercises the powers given to it, both directly and by delegation, as it considers appropriate as permitted by the Harbour Empowerment Order, 1890.
• Discharges the function of ‘Duty Holder’ as defined in the Port Marine Safety Code by ensuring compliance with the Code, and the safe management of navigation.

• Approves the strategy, policies, plans and budgets together with its strategic objectives.

• Reviews performance against its strategic and operational objectives, plans and budgets.

4.2.2 Harbour Executive Committee (HExCo)

The Harbour Executive Committee (HExCo) for the purpose of the PMSC comprises members of the Harbour management team based at St Mary’s (Land Steward, Harbourmaster, and a senior member of the Duchy’s finance team from the Duchy’s mainland staff. HExCo is additionally advised as required by a serving Pilot (and/or user representatives with appropriate navigational knowledge) as new options for managing navigational safety are considered.

HExCo is responsible for the immediate strategy of the Harbour (which the Harbour Master discharges) and responsible for co-ordinating projects which may include or bear upon navigational safety. It is also responsible for budget preparation and resource planning for the Harbour account. The Terms of Reference for HExCo are:

• HExCo will be responsible for recommending and executing the strategy, policies, plans and budgets for St Mary’s Harbour for the Duchy of Cornwall.

• The Chairman of the HExCo will discharge the role of Duty Holder, as defined in the PMSC.

• HExCo will appoint such advisors that it feels necessary to fulfil its function.

• HExCo shall appoint a Designated Person (as defined in the PMSC) who will offer independent assurance regarding the operation of the Navigational Safety Management System (SMS) within St Mary’s Harbour. The Designated Person will, through assessment and audit, determine the effectiveness of the SMS in ensuring compliance with the PMSC and report to HExCo.

• HExCo will be directly accountable to the Secretary and Keeper of the Records of the Duchy of Cornwall to whom all functions of the Committee shall be reported and approved.

• Membership of HExCo shall comprise the Land Steward of the Isles of Scilly (Chair), the Harbour Manager and a senior member of the Duchy of Cornwall finance team.
• HExCo will meet as frequently as required to fulfil its function and at least once per year. The Land Steward will arrange timings, agenda and distribution of recommendations/minutes etc.

4.2.3 Harbour Master

The Harbour Master is appointed by the Land Steward to discharge the statutory role of Harbour Master in accordance with the PMSC. He is responsible for delivering the Navigational Safety Policy and keeping the Land Steward and therefore HExCo advised and informed. This role is key to ensuring that the Navigational SMS fulfils the marine aspects of statutory duties and relevant non-statutory obligations.

The Harbour Master is the recognised representative for the Competent Harbour Authority and responsible for overseeing pilotage arrangements made by the CHA.

4.2.4 Designated Person (DP)

In meeting its obligations under the PMSC, the Duchy Board has appointed a ‘Designated Person’, which is an external and independent role. The Designated Person maintains a right of direct access to the Board and will provide written reports.

The role of the ‘Designated Person’ is to:

• Provide independent assurance to the Board that the Safety Management System is effective and appropriate.

• Provide HExCo and the Board with independent professional advice regarding overall compliance with the requirements of the Port Marine Safety Code.

• Harbour Specific information can be found in the ‘Harbour Specific Descriptions’ section 3 and an official appointment statement can be found in Annex A of the same document.

4.2.5 Others

Other responsibilities and duties are contained within individual job descriptions, which are signed as an acceptance and undertaking of those responsibilities, by the individuals concerned.

4.3 External Involvement and Responsibilities

The Duchy has an established liaison with port users through its Harbour Users Group (H.U.G.) and also a public Harbour Forum has been formed to implement the requirements of the Port Marine Safety Code. The H.U.G. will endeavour to meet where appropriate and be a key forum by which the Duchy will consult with harbour users. Direct liaison with other bodied or commercial user may also occur.
4.3.1 Navigational Advisory Panel

A Navigational Advisory Panel (N.A.P.), can be formed whose knowledge and experience is relevant to the nature of any particular hazard, risk control measure or new circumstance. Following any incident or change in circumstances the Harbour Master through HExCo will consider the need to recommend a Navigational Advisory Panel. The Harbour Master and a serving Pilot would automatically be members of a N.A.P.

A N.A.P. will take the following Terms of Reference, acting as:

- A forum for raising and discussing navigational issues, including safety, relating to the Harbour and Pilotage jurisdiction.

- A vehicle for consultation, which contributes to meeting the requirements of the Port Marine Safety Code and the supporting Code to Good Practice.

5. IMPLEMENTATION

Navigational Safety Objectives

In association with its duties and responsibilities the Board regularly reviews its Strategic Objectives. To support those Strategic Objectives, HExCo also sets individual objectives, which include the ongoing maintenance and development of the Navigational SMS. These Objectives seek to:

- Reduce risks to as low as reasonably practicable (ALARP).

- Ensure all reasonably practicable steps are taken to identify the hazards and risks arising from operational activities.

- Ensure conformance with our navigational and marine safety policies, associated operating controls and applicable port and marine legislation and non-statutory obligations.

- Periodically review data gathered from audits, inspections, incidents and any concerns raised to evaluate and determine where improvements and changes need to be made.

- Implement employee competence training and Navigational SMS awareness programmes.

- Facilitate port user involvement in the maintenance of the Navigational SMS and the overall improvement in the provision of navigational safety.

- Review the effectiveness of and continually improve the Navigational SMS.

5.2 Rolling SMS Action Plan
Section 4.1 lists the generic navigational safety objectives on which the plan is based. The Rolling SMS Action Plan reflects these objectives and provides a tool for continuous monitoring of all objectives and recommendations requiring implementation.

6. NAVIGATIONAL SMS DATA AND REVIEW

6.1 Safety Management Archive - Duchy of Cornwall Risk Management Register

The St Mary’s Harbour (Duchy of Cornwall) Risk Management Register contains a record of all identified hazards, together with the associated risk control measures employed to mitigate those hazards.

6.2 Incident Records

The Harbour Office holds a record of all reported navigational incidents and other occurrences having significance to the maintenance of navigational safety.

6.3 SMS Review

The identification and assessment of navigational hazards is central to the effective maintenance of the Navigational SMS. The Duchy uses their own risk management system as the basis for its continuing review of both new and existing hazards and their preventative control measures.

The review of hazards and control measures are prompted by three circumstances:

- Planned annual review of the Harbours risk assessments and risk management system.
- Review of hazards and associated risk controls following an incident.
- The identification and assessment of any potential hazards arising from changes in circumstances including the introduction of a new trade and/or marine operation.

6.4.1 Post Incident Reviews- Reactive
Following a navigational incident the Harbourmaster will conduct an initial investigation. This will establish whether there has been a failure to comply with Bylaws or internal procedures, and whether further regulatory action is required. It will also establish whether there is a need to review the relevant hazard and its associated control measures. This review may involve appropriate staff and users and the Harbour Master may convene a Navigational Advisory Panel.

6.4.2 New Risk Assessments

The Duchy uses the concepts of risk identification, evaluation ad risk reduction to manage Harbour safety. The criteria and methods used are available in the Harbour’s Risk management folder. Whenever circumstances change to bring in activities outside the existing scope of the navigational SMS, the Harbour Master will organise a risk assessment of the intended operation. This process may include initiation of a Navigational Advisory Panel.

7. CURRENT RISK MANAGEMENT SYSTEMS

7.1 Operating Procedures

The cornerstones of St Mary’s Harbour Navigational SMS are the knowledge, skills and competence of individuals within the system. Underpinning these is a system of operating procedures and guidance that are developed in parallel with the navigational safety management system. Reference copies of these are attached at Annex B.

7.1.1

The Duchy has established an effective program of annual underwater inspections of moorings to inform the Harbour Master of any obstructions. Occasional hydrographical surveys are undertaken to confirm berth depths to identify changes in Harbour topography.

7.1.2

The day to day running of the pilotage service is the responsibility of the Harbour Master, who shall keep under review safe boarding and landing areas, taking advice from serving pilots. The pilotage service is administered through the ‘Isles of Scilly Pilotage Manual’

7.1.3 Emergency Preparedness and Response.

The Duchy has developed and reviewed emergency response plans for the Harbour.

7.1.4

The Duchy is a key organisation in the development of Policies to deliver Environmental Sustainability to the Harbour and Islands in general and is the originator of many initiatives to improve liaison and awareness of the unique
environmental quality that is available in the Isles of Scilly. The Duchy Stewardship scheme is a good example of this.

8 TRAINING

8.1 Marine Training

Training is a key element within the Navigational SMS. In order to ensure that personnel are properly trained, the principles of job analysis and training design are followed. These are:

- Identification of operational and safety training needs.
- Establishing competency required for key tasks.
- Plan how training requirements are to be met and when.
- Establish a process to appraise the effectiveness of training.

8.2 Safety Management Training

It is the Duchy’s Policy that all new Harbour appointees shall attend a general induction to include aspects of the Navigational Safety Management System, to ensure that they are fully aware of the provisions of the Navigational Safety Management System, and of specific roles and responsibilities assigned to them within this programme. The topics to be covered shall include:

- Overview of relevant byelaws and Pilotage Directions;
- Review of the Navigational Safety Policy;
- Outline of Operating procedures, and their provisions;
- Principles of individual accountability and responsibility;
• Formal and individual procedural controls in place;
• Outline of response to emergencies and contingencies.
• Training and Competence Records

All training and instruction provided to employees will be recorded.

9 AUDIT

The auditing process of the Navigational SMS aims to provide input into the system ensuring continuous development by independent feedback.

Due to the particular skills necessary to conduct an audit of an appropriate depth, the Designated Person will initiate an audit on an Annual basis.

9.1 Audit Objectives

Audits are conducted to achieve the following objectives:

• To determine if the Navigational SMS is being operated in accordance with the Duchy’s Navigational Safety Policy and, the provisions of the Port Marine Safety Code.
• To monitor the overall effect of the system;
• To support the continuous improvement in navigational safety performance;
• To confirm that SMS procedures are understood and being actioned by those involved.
• Whether Duchy procedures in respect of marine operations and navigational safety remain appropriate and effective, thus comprising effective Navigational Safety Management System components.
Annex A

Risk Assessment Criteria
1 RISK ASSESSMENT.

The Port Marine Safety Code requires that the Navigational Safety Management System be based on a system of Formal Risk Assessment. This is also the principle that underpins the safety culture necessary to achieve incident-free operation.

The Risk Assessment process systematically identifies the hazards and consequences, which may occur, or arise from, the activities of the Harbour. The scope is all encompassing and includes navigational, geographical, weather, operation and vessel-related activities.

The Harbours risk assessments reside in the risk management folder which follows the requirements of the general Duchy of Cornwall risk management registers. They are subject to periodic review and continuous audit. The risk assessments will be maintained and amended in response to evolving changes within the Harbour.

1.1 Purpose

To assess the risk of a given hazard developing its potential for harm, in terms of consequence to Life, Property, the Environment or the Port Business. The assessed risk can then be considered in relation to any measures already in place to control it and additional risk control measures can be considered, if necessary, in order to bring the risk to a condition known as ‘as low as reasonably practicable’ (ALARP)

1.2 Method
Identify Hazards and possible consequences by means of personal interviews, consultation with relevant stakeholders, and review of incident data.

Evaluate the risk associated with the hazard in terms of frequency (likelihood) and consequence to life, property, the environment and the Harbour in both the most likely and worst credible scenarios, using the criteria set out below.

Identify and evaluate measures (risk controls) currently in place. Risk control measures include both those which prevent or reduce the probability of occurrence and those which mitigate the consequences if they do occur.

Assess whether measures currently in place are adequate for the control of the risk (ALARP) and if not, identify and evaluate further potential risk control (prevention and mitigation) options.

Implement selected risk control measures to bring the risk to the ALARP condition.

Monitor activities to ensure that the measures proposed do reduce risk and enable relevant objectives to be met.

1.3 Resources

Hazards within the Duchy of Cornwall are assessed using the following matrix.

<table>
<thead>
<tr>
<th>More than once a year</th>
<th>Likelihood</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
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<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
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</table>

**Impact**
<table>
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<tr>
<th>Consequence type</th>
<th>Minor</th>
<th>Moderate</th>
<th>Major</th>
<th>Critical</th>
<th>Catastrophic</th>
</tr>
</thead>
<tbody>
<tr>
<td>People (staff, tenants, visitors, public)</td>
<td>Minimal harm</td>
<td>Short-term harm</td>
<td>Permanent or long-term harm</td>
<td>Single fatality</td>
<td>Multiple fatalities</td>
</tr>
<tr>
<td>Financial loss - capital account</td>
<td>£0 to £5,000</td>
<td>£5,000 to £50,000</td>
<td>£50,000 to £500,000</td>
<td>£500,000 to £5m</td>
<td>Over £5m</td>
</tr>
<tr>
<td>Financial loss - revenue account</td>
<td>£0 to £250</td>
<td>£250 to £2,500</td>
<td>£2,500 to £25,000</td>
<td>£25,000 to £250,000</td>
<td>Over £250,000</td>
</tr>
<tr>
<td>Reputation damage (to HRH, Duchy, or associated brands)</td>
<td>Adverse mention in local press; query by regulatory body</td>
<td>Inside pages of national press; significant attention from regulators</td>
<td>Headlines in national press and TV; possible prosecution by regulators</td>
<td>Headlines in international media; ongoing coverage in national media; prosecution</td>
<td>International media; regulator intervention; major organisation prosecution; punitive fines</td>
</tr>
<tr>
<td>Actual or potential impact on the organisation's objectives</td>
<td>Management information does not meet business requirements</td>
<td>Sectional objectives not met, or project failure in one section</td>
<td>Sectional objectives not met, or project failures in multiple sections</td>
<td>Failure to meet one key organisational objective</td>
<td>Failure to meet multiple key organisational objectives</td>
</tr>
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</table>
### Annex B

**General Procedures**
1. SYSTEMS OF WORK-GENERAL

1.1 Purpose.

To ensure that all work is carried out in a way that meets appropriate safety standards and performance criteria.

1.2 Method.

Prepare documented procedures or standards for activities where appropriate, defining how they should be carried out.

Systems of work should employ procedures which facilitate, motivate and encourage personnel toward a suitable and non violable (compliant) safety culture. Systems should also identify required training, and mechanisms to provide feedback to personnel on safety performance and processes to recognise good personal and team safety performance.

All documented procedures should be recorded in the form of controlled documents within the Navigational Safety Management System Documentation System (see below).

1.3 Key Performance Indicators (KPI’s)

- Observance of documented systems;
• Near miss and dangerous occurrence statistics;

• Incident Statistics.

1.4 Defined Targets.

• Compliance with documented systems at all times;

• Zero Incidents;

• Decreasing/ negligible near misses, dangerous occurrences.

2. PERMIT TO WORK SYSTEMS

2.1 Purpose.

To ensure that hazardous work is carried out in a way which minimises any danger and meets appropriate safety standards. This requires:

• A clear understanding and identification of the particular hazards and risk control measures required.

• Designation of responsibility for verifying that all required risk control measures are in place and that no abnormal conditions exist which would invalidate the risk assessment.

• Designation of Authority to sign off permits to work;

Works covered by the Permit to Work System would include (but are not limited to) diving operations, entry into enclosed spaces and hot work, etc.

2.2 Method

• Responsible person identifies hazards and verifies that all required risk control measures are in place and fully operational.

• All personnel/ organisations likely to be affected by the work informed;

• Communication (if required) verified operational.
• Authorising Person countersigns Permit to work;

• Work is monitored to verify compliance with the conditions of the Permit.

• On completion of work, the Permit is to be cancelled and all relevant personnel/organisations affected by the work informed.

**2.3 Key Performance Indicators (KPI’s)**

• Observance of Permit to Work Systems;

• Incident Statistics;

• Near Miss and dangerous occurrence statistics.

**2.4 Defined Targets**

• Full compliance with Permit to Work Systems at all times;

• Decline in incidents;

• Decreasing/ negligible near misses, dangerous occurrences.

**3 INCIDENT AND NEAR MISS REPORTING AND INVESTIGATION**

**3.1 Purpose**

To enable the root causes of incidents and near misses to be identified, lessons to be learned and appropriate actions to be taken to prevent recurrence.

**3.2 Method**

Investigation and corrective actions shall aim to cover the following:

• Incident reporting (including statutory) requirements are observed.

• Root causes are determined.

• Risk control recommendations are applied to reduce the possibility of recurrence and/or mitigate the consequences to ‘ALARP’ levels.

• Conditions are monitored to ensure that the applied risk controls are effective to prevent recurrence of the incident.

• Procedures are revised to incorporate above risk controls, and changes are communicated to relevant personnel.

**3.3 Key Performance Indicators (KPI’s)**

• Number and severity of incidents occurring.
• Number and severity of near misses reported

3.4 Defined Targets

• Records of all incidents investigated and closed out.
• Incidents progressively reducing in severity and number with time.
• Lack of ‘repeat’ incidents.
• Severity of near misses reducing with time.

4 NSMS DOCUMENTATION MANAGEMENT

4.1 Purpose

The purpose of the documentation and record system is to record the current status of:

• Safety policy objectives, and plans.
• Key roles and responsibilities, authority and lines of communication.
• Standard operating procedures and work instructions for critical activities and tasks.
• Risk assessment, management and control.
• Emergency response plans and the means of responding to incidents and potential emergency situations.

And to make the above information available and comprehensible to all personnel who require it.

4.2 Method

Identify all documents comprising the Navigational Safety Management System with appropriate notation. The system must be clear, concise, and user friendly. Distribution of NSMS documents should only be via controlled copies and a register maintained. Document holders must confirm receipt. Procedures must be in place for the amendment of controlled copies and include verification that amendments have been carried out by the document holder.

4.3 Key Performance Indicators (KPI’s)

• Establishment of workable distribution, filing and indexing system.
• Personnel awareness of system (Appraisal).
• Evidence of ongoing development of the system.

4.4 Defined Targets

• Maintenance of the integrity of the system.
• Only have controlled copies in circulation.
• Full understanding of the system by users.

5 SAFETY REPORTS

5.1 Purpose

To provide the Duchy with a regular report on the safety performance of the Harbour and the effectiveness of the Safety Management System.

5.2 Method

An annual safety report should be compiled with input from the Harbourmaster which should include information about the following:

Incidents or near misses including:

Collision/ Contact
Fire/ Explosion
Vessel Grounding
Loss of Vessel Stability, Hull integrity
Pollution/ Environmental incidents
Dangerous Occurrences and Near Misses.
Accidents and lost time injuries.

The report should include references to defects affecting marine safety and the results of Audits by the Designated Person.
# REVISION DIARY

<table>
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<th>Revision Date</th>
<th>Summary Of Changes</th>
<th>Changes By</th>
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