

**People & Social Responsibility**

PSR/HSE/MS Division

Destinataires / To : Philippe Diebolt, Brigitte Paule, Abdesslam Rhnimi, Caroline Royer, Didier Humbert, Stéphane Déméautis	Expéditeur / From : Hans-Christian Gützkow
Copy : Alexandra Papillon, Peter Theunissen, Aude-Lise Chaput, Laurent Marie-Catherine	Date : 19/12/2019
Subject: Deployment of company rule CR-GR-HSE-421	

Dear all,

The company rule CR-GR-HSE-421 *Management of Pollution Risks at Activity Cessation* was published on REFLEX on the 01/10/2019 and will be effective on the 01/01/2020. This company rule replaces Group Directive DIR-GR-ENV-005 et DIR-GR-HSE-008 (not transposed into M&S referential).

A summary listing the main requirements is available on the first page of the company rule. To help you deploy this rule on the field, we offer in addition:

- A synthetic gap analysis (additions, modifications and deletions) between the old and the new rule, specific for M&S;
- A support file intended to list the requirements of this rule and enabling their compliance follow-up.

The CR-GR-HSE-421 company rule defines requirements for the definitive cessation of industrial activities on a site (including service stations). It reaffirms the Group's objective: to maintain, after a cessation of activity, control over the future use of the site and to the possibilities of redevelopment for the Group's activities (solar, reforestation, etc.). This rule does not apply to sites in operation or to mothballing sites.

The objective is to ensure the management of risks to human health and safety and, where necessary, risks to the environment that could be caused by soil, groundwater or surface water pollution. Thus, this company rule requires following the definitive cessation of activities on an industrial site:

- The immediate implementation of safety measures,
- The assessment and management of risks related to pollution,
- The determination of pollution management methods depending on:
  - ✓ The future use of the site,
  - ✓ Regulatory and internal obligations,
  - ✓ The human health and safety risk assessment, as related to a final defined use,
  - ✓ The management of risks to the environment when necessary,
  - ✓ The implementation of technical good practices available for remediation,
  - ✓ The cost/benefit optimization,
  - ✓ The potential media exposure,
  - ✓ The exchange with local stakeholders.

In the event of a cessation of industrial activity on a site, the HSE M&S Division can offer you support from the RETIA subsidiary (supervision of diagnosis, decontamination process, etc.).



# MEMO

☞ I remind you that each affiliate must:

- Identify the gaps between its referential and the new requirements,
- Implement the associated action plans to correct the differences,
- Comply with the rule on the target date.

Hans-Christian Gützkow

## List of published company rules

Reference	Title	Date of publication	Effective date
CR-GR-HSE-001	One-MAESTRO HSE Expectations	09/03/2018	09/09/2018
CR-GR-HSE-100	HSE & Reporting indicators	24/09/2018	24/12/2018
CR-GR-HSE-114	Evaluation and monitoring of HSE risks on OBO assets	28/01/2019	28/07/2019
CR-GR-HSE-302	HSE Requirements for Management of Change	22/07/2019	22/01/2020
CR-GR-HSE-402	Permit to Work Process	30/09/2019	30/03/2020
CR-GR-HSE-404	Road vehicle driving safety	22/10/2018	22/10/2019*
CR-GR-HSE-405	Industrial hygiene	28/01/2019	28/01/2020
CR-GR-HSE-412	Stakeholder and Local Impact Management	26/11/2018	26/02/2019
CR-GR-HSE-414	HSE requirements for operating pipelines	28/01/2019	28/01/2020*
CR-GR-HSE-415	Safety of aviation activities	14/06/2019	14/09/2019*
CR-GR-HSE-417	Flammable and Combustible Liquids Storage Safety	30/09/2019	30/03/2020*
CR-GR-HSE-419	HSE Requirements for Excavation works	24/06/2019	24/09/2019
CR-GR-HSE-421	Management of Pollution Risks at Activity Cessation	01/10/2019	01/01/2020
CR-GR-HSE-424	Working with high pressure water jets	22/10/2018	22/01/2019
CR-GR-HSE-425	HSE requirements for work at height	10/07/2019	01/01/2020
CR-GR-HSE-430	Rail transport safety	22/10/2018	22/04/2019*
CR-GR-HSE-501	HSE Requirements for Contractors	24/05/2018	24/11/2018
CR-GR-HSE-701	Emergency and Crisis Management	30/09/2019	30/12/2019
CR-GR-HSE-705	Contingency Planning for Accidental Surface Water Pollution	30/09/2019	30/12/2019
CR-GR-HSE-801	HSE event management and feedback	24/09/2018	24/12/2018
CR-GR-HSE-902	HSE self-assessments and HSE audits	24/09/2018	24/12/2018*

\* Some requirements of this company rule will be effective after the effective date.

 Règles déjà applicables