



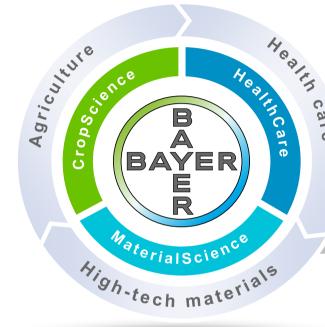
Bayer CropScience subgroup Industrial Perspective SMS Legal frame, Execution and Sustainable Evolution

Safety Management Systems in Multinational Companies

Mutual Joint Visit Workshop for Seveso Inspectors 17-19 September 2014, Arona, Italy

Worldwide Main Indications





115,487 employees

Sales: €40.2 billion

289 subsidiaries

R&D expenditures: €3.2 billion

As of December 31, 2013 / Employees: June 30, 2014

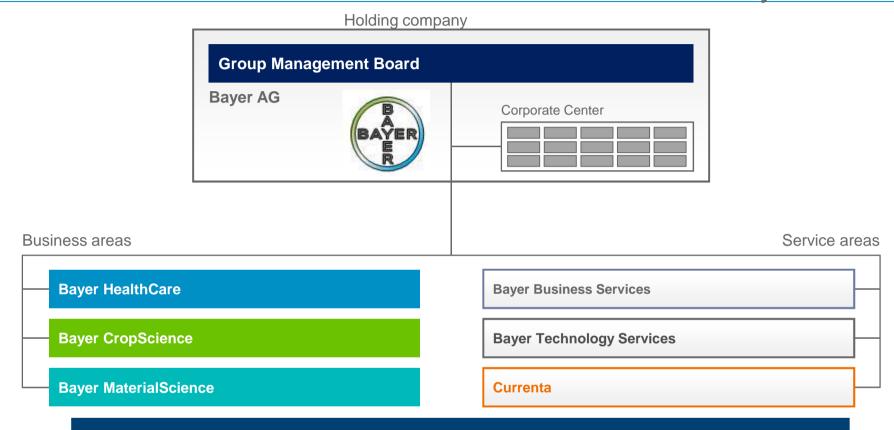


Sustainability ,Plant & Process Safety , Occupational Health and Legal Compliance are Integral Part of the Corporate Strategy





Structure info's to understand the Guidelines Uniformity



To maintain a strong alignment between the mission and objectives of the **Bayer Group** similar structures are applied in different countries. In some countries **as Italy** for each Business area there is a corresponding Industrial Area with own specific legal frame and duties.

Rules and Regulations main indications (1)



Objectives

Information about validity and scope between internal and external Rules and Regulations Information about Bayer Corporate and Subgroups internal regulations for Process and Plant Safety.

Priorities

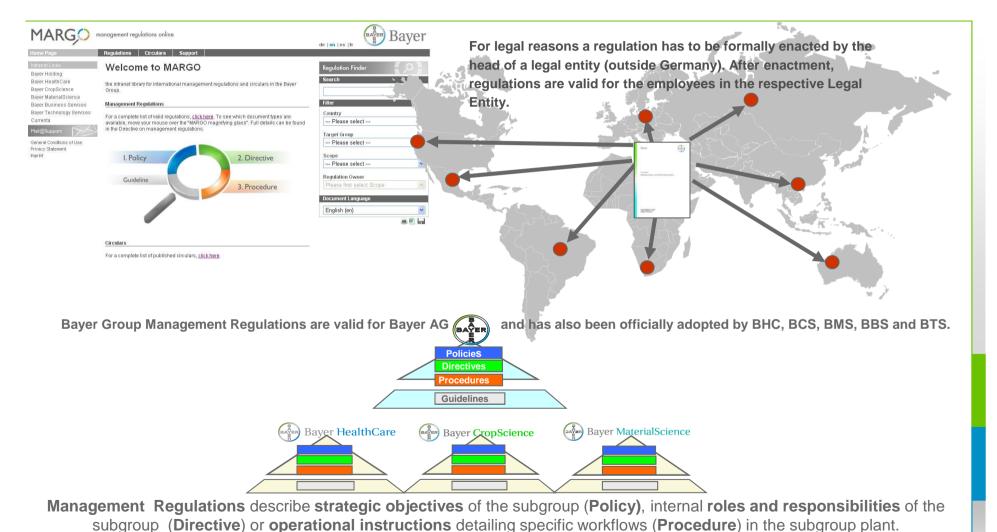




- ✓ The stricter regulation has to be applied.
- ✓ In case of conflicts with legal regulations the legal requirement have to be followed.
- ✓ Indications supported by Internal Rules have to be adapted to the frame required by local regulation

Bayer Group Rules and Regulations (2)



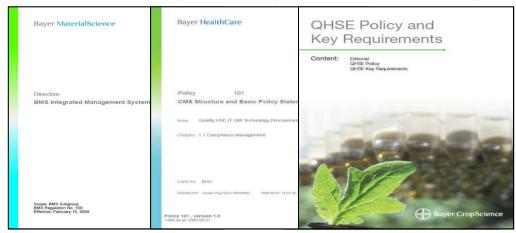


Safety Management Systems in Multinational Companies

Safety Management System (SMS) Every subgroup has its own implementation



Implementation at Bayer Subgroup and Country Legal Entity



Implementation at the sites (partially indications)

- ✓ Every site is responsible for the local implementation
- ✓ Consider global and local rules
- ✓ SOPs, roles and responsibilities
- Emergency measures (IEP, EEP, Unit emergency response, planning)
- ✓ Training
- ✓ Communication

Safety Management System (SMS) Regulations within Bayer Group



The Best Practice Process and Plant Safety Compendium

As integral part of <u>Bayer's commitment to</u> <u>sustainability</u>

......to ensure that our operations do not pose <u>any</u> <u>inappropriate risks to employees</u>, the environment and community.

.....excellence in the field of Process & Plant Safety is therefore indispensable

- ✓ Best Practice "Plant & Process Safety Compendium" complements.
- ✓ Bayer Group Process & Plant Safety Directive and its binding attachment "Safe Design and Operation of Processes and Plants"

Must be applied in order to achieve effective results.

Best Practice

Process and Plant Safety Compendium

Group No. 1928 (Edition: 2)

Scope: Group

Effective: March 1, 2013

Safety Management System (SMS)

Regulations within Bayer Group



The Group Regulation 2019 Directive Management of Change applies for temporary and permanent changes on

- ✓ Technical installations
- ✓ Processes and procedures
- ✓ Organizational structures
- ✓ Products

The Group Regulation 2033 Manag.of Change and Work Permit for Hazardous Work Procedure gives a framework for an adequate

- ✓ Management of Change of technical and organizational changes (temporary and permanent)
- ✓ Handling of Work Permit procedures for hazardous work

Safety Management System (SMS)

Regulations within Bayer CropScience Subgroup



The Guideline SA.G.13.0 Incident Investigation

provides assistance to the Sites/locations to establish

- ✓ Written, effective, and efficient "fundamental cause" incident investigation, analyses, corrective action planning process
- ✓ Incident communication management system in order to share experience about the incidents occurring in our Company
- ✓ Appendix .
 - Process flow
 - Questionnaire
 - ☐ Incident investigation method Casual Tree
 - Case study
 - Process table

Safety Management System (SMS) Focus point within Bayer Group



Legal requirements

Europe Seveso directive as basis, and similar rules in other countries throughout the world .

Therefore in effect throughout all Bayer Group

Implementation in every subgroup and at every site necessary

Everyone needs to know his / her roles and responsibilities within the SMS

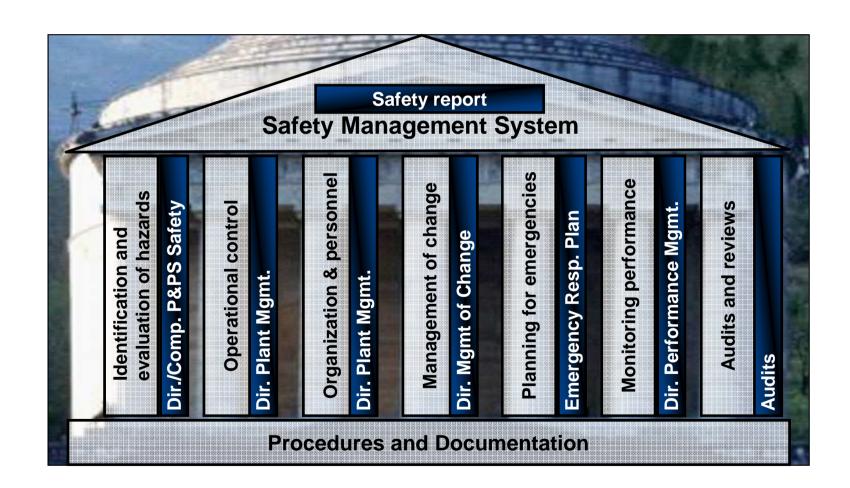
7 Pillars

Procedures and Documentation describing the daily work in the site /plant



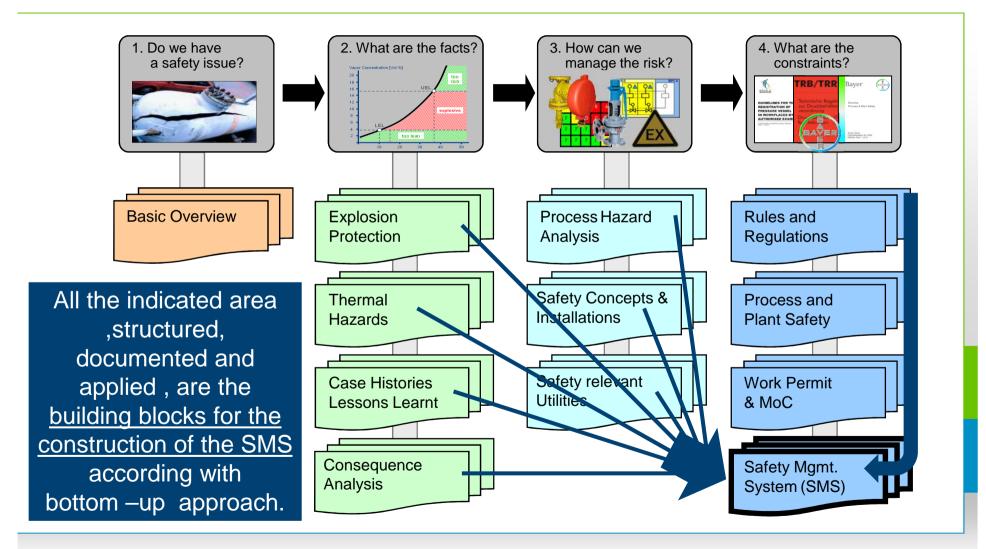
Safety Management System (SMS) Safety Report pillars/ documents within Bayer Group





Safety Management System (SMS) The reference work frame





Safety Management System (SMS) Network to share experiences and knowledge

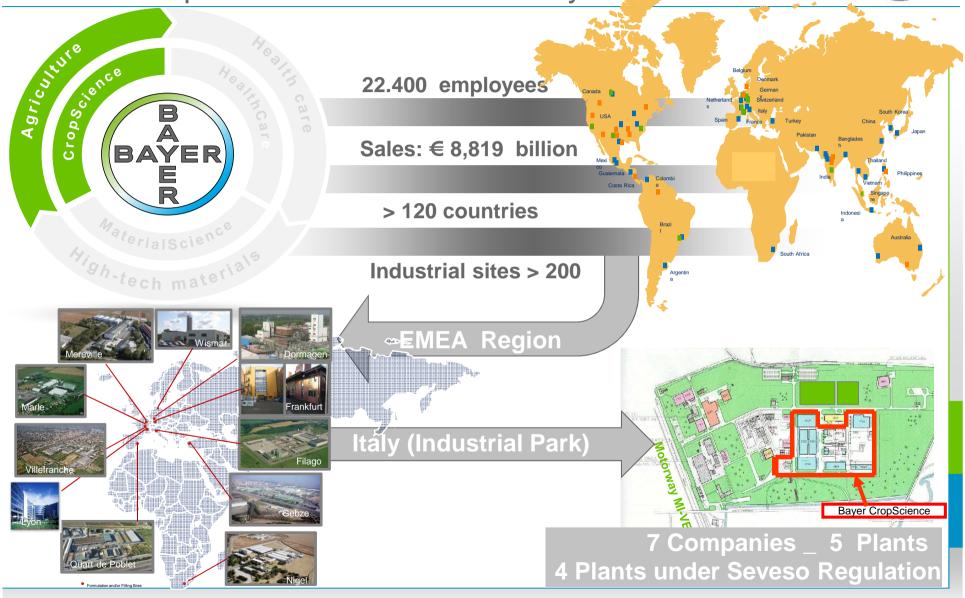




Bayer CropScience Subgroup

Industrial Operations World => Country Network







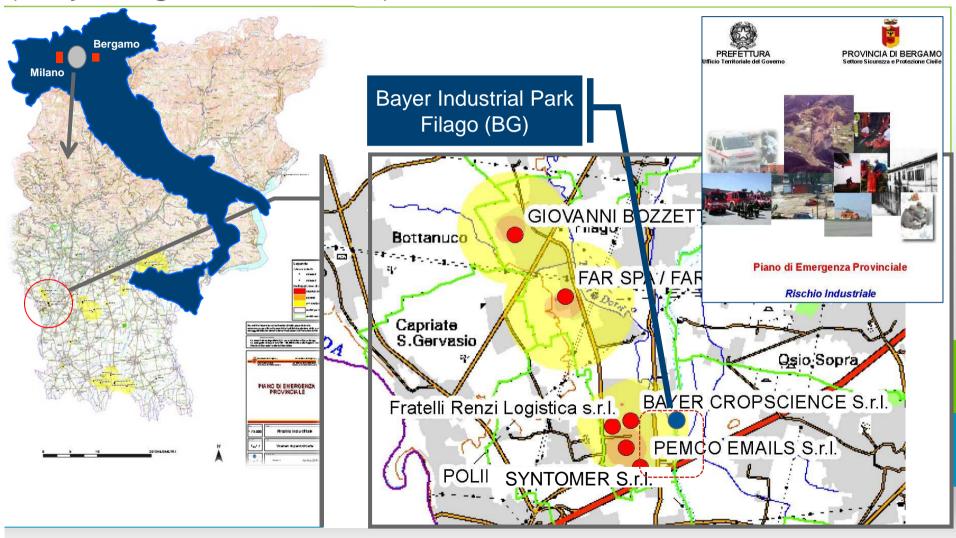


Bayer CropScience Italy
Site Filago (BG)
Bayer Subgroup Site were the rules must
fit all together in the SMS

Bayer CropScience Italy

Site Filago Position and External Emergency plan (Italy / Region Lombardia)





Bayer CropScience Italy Site Filago Activities (Italy / Region Lombardia)





Site Established in 1984
(30 years activity)
Italy business and Export business
Agrochemicals and Agrobiologigs
Products
for Professional and Garden use.

EU , National & Regional Laws Bayer Regulations ISO , OHSAS , IMO

Ministry of Health Authorization

Products all tox.classifications Biocides/Environ.protection

Seveso Directive applied

Notification Art. 6 with the duty of preparing the Safety Report referred to Art. 8 as a result of exceeding the threshold limit of column 2 and 3 of the quantity of dangerous substances held (Annex I, Part 2 ^).



Safety Management System (SMS) Bayer CropScience Italy Site Filago Legislative Context



European l	Jnion EU
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Italian law

European Directive 82/501/CEE Seveso

Implemented in Italy with DPR 17 may 1988, n. 175 the first version

Directive 96/82 CEE

Seveso II

Implemented in Italy with **D.Lgs. 334/99** with related legal rules for application (n. 7)

Directive 2003/105/CE

Seveso II bis

Legislative Decree 21 September 2005, n. 238

Directive 2012/18/UE

Seveso III

Entry into force on 13 August of the same year, to be transposed by Member States by June 1, 2015

Regulation (CE) n. 1272/2008

CLP

Adapts the previous EU legislation to the GHS (Globally Harmonized System of Classification and Labelling of Chemicals),

(classification, labeling and packaging)

Safety Management System (SMS) Bayer CropScience Filago Bayer Group Context



Bayer Cropscience AG SubGroup

- Policy QHSE
- Directive
- Procedure
- Guidelines

Bayer CropScience Filago SubGroup Site

- Policy QHSE
- Document of the Policy ARIR
- SGS handbook
- Management Procedures
- Emergency Plan

Bayer Spa Italia Corporate

- Policy QHSE
- Management Procedures
- Bayer Industrial Park Environmental handbook
- Bayer Industrial Park Security handbook
- Bayer Industrial Park Emergency Plan

Opportunity of improvements considering

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Multinational internal context and SMS requirements

to reduce double work as legal documents release with same contents but different structure.

Safety Management System (SMS) Bayer CroScience Filago SMS Structure



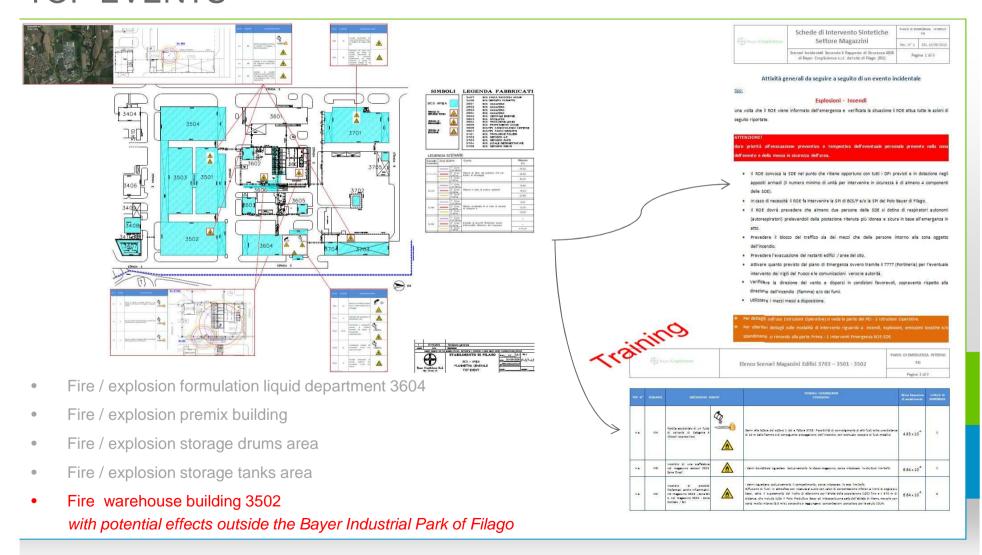
To achieve the objectives of the prevention Policy and in compliance with the general principles adopted, Bayer CropScience Filago has articulated its own Safety Management System by providing the following documents

- Policy QHSE Bayer CropScience S.r.l.
- Major Accident Prevention Policy
- Safety Management System handbook
- Management Procedures

	Chapter 1	The Safety Management System
	Chapter 2	Organization and Staff
	Chapter 3	Identification and evaluation for relevant Hazards
	Chapter 4	Operational control
>	Chapter 5	Management of change
	Chapter 6	Emergency planning
	Chapter 7	Check and corrective action
	Chapter 8	Check and review
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Safety Management System (SMS) Bayer CropScience Filago TOP EVENTS





Safety Management System (SMS) Bayer CropScience Filago Training frame



- Specific Training according to Seveso Law (every 3 months)
- Specific training according to health and safety at work legislation DL81/2008 (i.e. Region & State Agreement)
- Ministry of Health light GMP training requirement for Operational Processes.
- Specific / technical training from Bayer Corporate .
 (i.e. TOPPS Top Performance Process and Plant Safety)
- Specific training from Bayer CropScience Subgroup
 (Expert Advice, Monthly Report, Lesson Learned, Safety beacon,
 TGP Technical Good Practice Document. Six Sigma, FELS, BBS, ...)
- Specific training from Bayer CropScience site Filago
 (i.e. Procedure new release/update, Team work organization, Leadership Safety, Transport Rules, Contamination prevention, IEP, Legal obligations,.....)

Safety Management System (SMS) Bayer CropScience Filago

B A BAYER E R

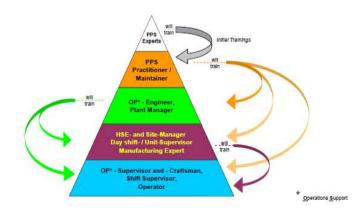
Training example from TOPPS

(Top Performances in Process and Plant Safety)

- 1. Clear commitment to PPS by top management
- 2. Enhance monitoring and control of PPS performance
- 3. Improve communication concepts to increase awareness of PPS topics
- 4. Improve efficiency and impact of regulations/procedures/processes
- 5. Establish systematic PPS training strategy
- 6. Increase availability and accessibility of PPS expertise
- 7. Safeguard organizational structures to maintain the desired level of PPS
- 8. Refine Management of Change processes

The Frame of Project Full in place

Training Cascade / Pyramid Scheme



The TOPPS training is split into 9 Modules:

- . Basic Overview
- 2. Rules and Regulations
- 3. Process Hazard Analysis
- 4. Explosion Protection
- Thermal Hazards
- Safety Installations
- 7. Safety Relevant Utilities
- 8. Consequence Analysis
- Training Techniques (applicable only for level 5 and trainers)

Training to reach expectations. Full in place

Safety Management Systems in Multinational Companies

Safety Management System (SMS) Bayer CropScience Filago

Inspections / Audit from different actors on the same site



Internal HSEQ Audit

Bayer Corporate Process & Plant Safety Audit Seveso Law Inspection

Safety&Health Audit (DL81/2008)

Ministery Health Audit & Inspection

Legal compliance Audit (DL 213/2001) 20 day/year devoted to Audit /Inspection 3,5 resources /year to manage the workflow.

20 % of resources is required to maintain different documentations with similar contents but low level of synergy.

ADR / IMDG Audit

ISO & OHAS Audit

Assurance Risk Audit

EMAS Audit

Inspections without preliminary notice made by official control organizations operating on the territory (ASL, ARPA, NAS,)

"Seveso" Directive 30 year after.

Opportunity for improvement in the light of experience



- Main areas for improvement considering
 - □ SMS multinationals approach
 - ☐ Seveso III and Regulation CE 201218/EU
 - Risk analysis methodologies and Company approach
 - Safety Report delivery
 - Inquiries and Controls
 - Information / Formation / Training requirements
 - Emergency planning
 - Land –use planning

In the next slide one example as input for Breakout sessions

"Seveso" Directive 30 year after.

Risk analysis methodologies and Company approach



Example

- In most cases, industrial corporate has developed and formalized its own qualitative ranking for the Top Event expected probability and related accident effects magnitude, without any further need for probabilistic and consequences analysis.
- This normally represents the major effort and time consuming task in risk analysis (PHA/HAZOP) , but often this **isn't appreciated in Safety Report inspection where the local law** asks for <u>a formal probabilistic</u> and consequences quantitative evaluation.

"Seveso" Directive 30 year after Important results



The experience in risk analysis and SEVESO directive implementation has provided a lot of benefits in EU safety and risk prevention culture

Risk analysis and Seveso implementation has led to

- Strong improvement in the safety culture.
- Substantial investments dedicated to the improvement of active and passive safety.

The growth has involved all interested parties:

- Risk analysts;
- Companies falling within the scope of the Directive;
- Engineering companies;
- Authorities in charge of the management of the regulatory and supervisory bodies.

The results of this growth are also visible in

- Increased involvement of local authorities
- Greater collaboration with the authorities of civil protection and emerg.planning,

"Seveso Incident 10 July 1976" The Mayor of Mayors





Francesco Rocca

He is no longer (2nd August 2014) with his people of Seveso where he was Mayor of twice from 1970 to 1980 and has been able to cope in an exceptional way the well-known event ICMESA 10 July 1976.

The population of Seveso remembers him for his ability to handle those difficult moments in a balanced and pragmatic way.

He has been called "The Mayor of Mayors"





Thank for your kind the attention!

Bayer Group

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