

To the attention of:  
Perenco S.A.  
Eric Iwochewitsch  
Chairman and Chief Executive Officer  
7 rue de Logelbach  
75017 PARIS

*By registered letter*

**Subject: Request for information concerning the prevention of risks resulting from Perenco S.A.'s activities**

Dear Mr. Chairman and CEO,

Our organizations would like to call on Perenco S.A. to be transparent about its activities and their risks.

Pursuant to Article L. 225-102-1 of the French Commercial Code, Perenco S.A. is required to publish a statement on extra-financial performance presenting “*information on the manner in which the company takes into account the social and environmental consequences of its activity*”.

However, Perenco only published its first statement in 2020, and it is particularly incomplete.

In its statement for the year 2019, Perenco limits the description of its activity to the mere “*provision of services and assistance to all the various hydrocarbon exploration and production companies of the Perenco group throughout the world.*”<sup>1</sup>

However, it appears from its articles of incorporation, in particular those registered on February 4, 2015, to which reference should be made with regard to the company's activities in 2019, that its corporate purpose is much broader since it actually includes:

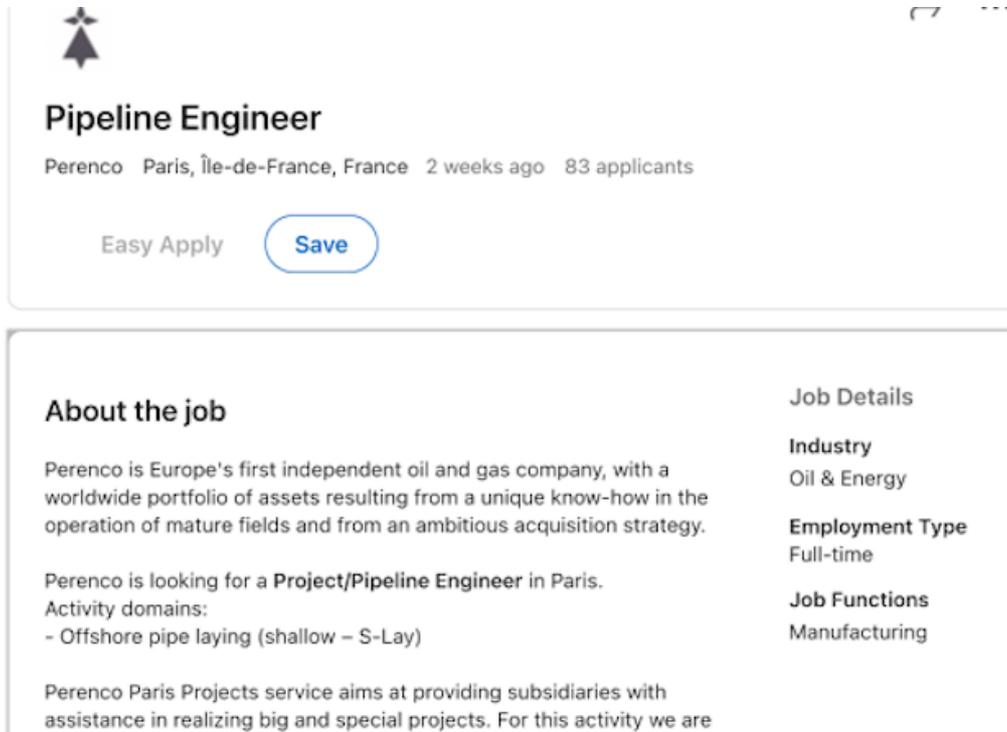
- “*both in France and abroad, the exploitation of hydrocarbon fields at sea and on land (...)”*,
- “*all related activities (...) linked to oil reconnaissance, exploration and production”*,
- “*reconnaissance engineering and technical supervision of the exploitation, extraction, processing and transportation of hydrocarbons”*, as well as
- “*the execution of engineering and supervision contracts concluded with companies with similar objectives, and with French or foreign oil companies.”*

Perenco S.A.'s activity is indeed almost exclusively international, as confirmed for instance by:

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<sup>1</sup> See “[Reporting Extra financier 2019](#)”, Perenco S.A.

- the statement on extra-financial performance in that it mentions the proportion of employees located abroad (75%);
- its latest annual accounts;<sup>2</sup>
- its job offers, which mention “*providing subsidiaries with assistance*”:



**Pipeline Engineer**  
Perenco Paris, Île-de-France, France 2 weeks ago 83 applicants

Easy Apply [Save](#)

**About the job**

Perenco is Europe's first independent oil and gas company, with a worldwide portfolio of assets resulting from a unique know-how in the operation of mature fields and from an ambitious acquisition strategy.

Perenco is looking for a **Project/Pipeline Engineer** in Paris.  
Activity domains:  
- Offshore pipe laying (shallow – S-Lay)

Perenco Paris Projects service aims at providing subsidiaries with assistance in realizing big and special projects. For this activity we are

**Job Details**

**Industry**  
Oil & Energy

**Employment Type**  
Full-time

**Job Functions**  
Manufacturing

Perenco S.A. also presents itself in these terms on its website:<sup>3</sup>



[Home](#) > [About us](#)

Since Perenco was founded by Hubert Perrodo in 1975, the company has diversified to become the leading independent oil and gas company in Europe today. The company produces 465,000 boepd through its drilling, development and operations, thanks to its onshore and offshore presence in 14 countries.

However, Perenco's statement on extra-financial performance does not mention the true nature of its activities related to hydrocarbons exploration and exploitation. The word “oil” appears only once, in the section “*Promoting employee well-being*”, in the category “*Sailing: preparation courses and participation in the Petroleum Cup*” (!).

<sup>2</sup> All production sold by Perenco S.A. in the amount of €186,842,369.51 was sold to the group’s companies abroad, as shown in the annual financial statements published in 2019 for the year 2018.

<sup>3</sup> [Job offer “Ingénieur Forage”](#) for Perenco S.A. on LinkedIn (last accessed on May 25, 2021).

The statement for the year 2019 only covers a geographical area limited to the Paris headquarters of Perenco S.A.

The same is true in relation to the company's impacts on the environment. The description of the pollution related risks of Perenco S.A.'s activities is indeed limited to the “*waste management*” (paper, cardboard, light bulbs, etc.) of the offices of its Parisian premises, whereas the potential for toxicity is particularly high in the oil and gas sectors.

The declaration should have included information on how Perenco S.A. takes into account the social and environmental consequences of its global oil and gas exploitation activities.

The independent third party in charge of the evaluation report of this extra-financial performance statement also notes that:

*“the process of identifying and prioritizing risks leading to the presentation of the main risks is not formalized.”<sup>4</sup>*

This reflects Perenco's widespread lack of transparency.

Perenco has decided to remain an opaque organization, by refusing to communicate any information on its structure despite numerous requests from NGOs and their counsels. In addition, it opposed the execution of a court decision requiring the company to communicate documents relating to environmental damage in the Democratic Republic of Congo.<sup>5</sup>

This opacity is largely facilitated by the almost systematic use by Perenco group of [shell companies in tax havens](#), where access to information is totally blocked.

Perenco group seems to benefit from the complexity of its structure, denying any link between Perenco S.A. and the other group's companies operating abroad if any damage occurs, but claiming French nationality in other circumstances.<sup>6</sup>

This widespread opacity results in the absence of any public and accessible information regarding Perenco group's organization and operation, in particular regarding the actual connections between Perenco S.A. and companies operating abroad.

Only our organizations' long-term research and cross-checking work brought to light corroborating evidence pointing to the control exercised by Perenco S.A. over the activities operated abroad.

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<sup>4</sup> “[Reporting Extra financier 2019](#)”, Perenco S.A., p. 28.

<sup>5</sup> Le Monde, “[Perenco, boîte noire pétrolière et toxique en RDC](#)”, October 9, 2019.

<sup>6</sup> Le Monde de l'énergie, “[L'Equateur va verser au moins 374,4 M USD à Perenco](#)”, June 2, 2021.

In Tunisia, Perenco seems to operate with a complete lack of transparency, without disclosing any information about the nature of its activities and the risks caused to the communities and the environment.<sup>7</sup> In 2010, the company sparked outrage from local civil society after publicly announcing on its website that it had “successfully” carried out horizontal hydraulic fracturing tests on the El Franig site, with a view to exploiting shale gas, a practice reputed to be particularly toxic for the environment.<sup>8</sup>

In Gabon, NGOs and local communities have filed two complaints to demand the cessation of the group's activities as well as an environmental impact assessment and compensation for the victims:<sup>9</sup> Perenco is suspected of being the source of oil spills poisoning soils and waterways and impacting the daily lives of local residents.<sup>10</sup>

In Peru, Perenco operates more than 200 oil wells in a region of global ecological importance called “*ecorregión de bosques húmedos del Napo*”. Local communities report soil and water pollution due to oil spills and denounce the fact that they are not involved and informed.<sup>11</sup>

In the Democratic Republic of Congo, Perenco is suspected of seriously affecting the environment and the social balance of the Muanda territory due to oil leaks, gas flaring and toxic waste that appear to threaten the health and livelihood of local communities.<sup>12</sup>

Yet the harms persist.

Numerous reports from civil society, the media, and elected representatives point to the same type of violations.

Therefore, environmental and human rights violations that seem to be linked to Perenco's activities appear to be systemic.

In these circumstances, our organizations are writing to ask Perenco S.A. to respect its obligations in terms of extra-financial performance reporting.

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<sup>7</sup> Avocats Sans Frontières and I Watch, “[Saisine du PCN français pour établir la transparence sur les activités du Groupe Perenco en Tunisie](#)” (Press release), December 10, 2019.

<sup>8</sup> Report published by Heinrich Böll Stiftung Afrique du Nord, “[Gaz de schiste en Tunisie : entre mythes et réalité](#)”, 2015. See also: Avocats sans Frontières and I Watch, “[Saisine du Point de Contact National Français dans le cadre de la mise en oeuvre des Principes directeurs de l’OCDE](#)” (executive summary of the specific circumstance), July 27, 2018.

<sup>9</sup> RFI, “[Pollution pétrolière au Gabon: des actions en justice contre la société française Perenco](#)”, January 23, 2021.

<sup>10</sup> Jeune Afrique, “[Gabon : au cœur du bras de fer entre la société civile et le groupe pétrolier Perenco](#)”, January 19, 2021.

<sup>11</sup> CCFD-Terre Solidaire, “[Le baril ou la vie ?](#)”, September 2015. See also: CooperAccion, “[Expansión petrolera y pueblos indígenas en la Amazonía. El caso Perenco](#)”, March 2013.

<sup>12</sup> CCFD-Terre Solidaire, “[Pétrole à Muanda : la justice au rabais](#)”, November 2013 ; Agence d’information d’Afrique centrale, “[Environnement, Perenco sommée de dépolluer Moanda](#)”, November 23, 2013 ; Report of the Congolese Senate by the Commission of Inquiry on the pollution caused by oil exploitation in Muanda in the province of Bas-Congo, published in October 2013.

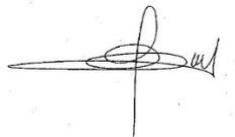
More generally, they call for transparency on the group's structure, organization and operation of its activities, in order to make it possible to repair the harms suffered and to prevent future damage.

We therefore request that Perenco S.A.:

- on the one hand, publish a statement on extra-financial performance in accordance with applicable legislation,<sup>13</sup> explaining how it takes into account the social and environmental consequences of its activities in France and abroad;
- on the other hand, communicate relevant information relating to the organization and operation of Perenco group, in particular:
  - the group's organizational chart, its overall governance structure, including in particular the identity of all the group companies' directors (through which Perenco S.A.'s control over the group's companies would appear);
  - the services sold by Perenco S.A. to the companies operating in the countries where oil exploitation is carried out, in particular the nature of these services, the details of the missions and the amounts concerned (contractual links through which Perenco S.A.'s operational control over the group's companies occurs);
  - the corporate documents of each of the group's companies up to the final beneficiary (articles of incorporation, K-bis extracts and equivalents, shareholding, composition of the management bodies);
  - the consolidated accounts of Perenco S.A.

Respectfully,

For Sherpa, Sandra Cossart, Executive Director



For Friends of the Earth France, Khaled Gaiji, President



For Avocats sans Frontières, Chantal van Cutsem, Executive Director



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<sup>13</sup> Article L. 225-102-1 of the French Code of commerce.