Dear Mr. Pearce,

Thank you very much for your email. As the ILO is acting as a facilitator in the process of undertaking the mine safety assessment but will not be directly involved, I have copied into this message the officials of the Ministry in charge. I trust they will shortly contact you directly.

Best regards,

Lejo Sibbel
ILO DWT/CO Moscow

Sent from my iPhone

Dear Mr Sibbel,

I am responding to your query regarding a mine safety assessment. We can assist and can supply British, Australian and/or Russian specialists, all of whom are former managers of operations. I am aware of the concerns and would like to know more details about the assessment, specifically how we would engage with the mine owners and the State authorities, as without their support, no change will be possible.

In our audit we would look at the following:

- Were the mines designed to be safe? Were they designed appropriately for the conditions?
- Were appropriate safety systems installed, are they being maintained appropriately, are they being used appropriately?
- What is the attitude towards safety? Is it being compromised by the pressure of productivity bonuses on the workforce and supervisors? What is the attitude towards the root causes of accidents?
- Are there safe operating procedures in place? Are these practical? Who undertakes checks of the working conditions and practices?
- What is the approach to analysing the root causes of accidents? Are accident investigations thorough, looking at each of the contributing factors to identify whether suitable controls were in place and being maintained, and if not, why not?
- What steps would need to be changed in terms of:
  - > Engineering
  - > Training
  - ➤ Audit inspections by an independent department, reporting to the site manager/owner
  - ➤ Audit inspections by an independent authority
  - ➤ Working culture

We can approach this audit in several phases:

- Initial audit by two consultants: one British, one Russian
  - Having worked in many environments I am aware that it is important to understand the influence of culture on the working practices, and also if it is possible to communicate informally (i.e. not through a translator), sometimes more can be discovered. There have been several major disasters in Russia where they had the latest engineering but the systems were all bypassed to meet the production targets. The issue was the combination of pressure by the workforce to boost their bonus as this was a high proportion of their monthly income, bravado (mining is dangerous and we are heroes), fatalism (when it is your time), and an unwillingness to challenge authority
  - ➤ The audit will look to determine the root causes of the incidents. The specialists will need to spend 3-4 days at each site visiting the operations; talking with management, safety specialists, supervisors, operators; reviewing past accident reports; reviewing past safety reports; reviewing the engineering and design.
  - ➤ They will prepare their report and this will be submitted through the agreed channels, initially to verify facts and statements, and then for discussion
- Development of an action plan
  - ➤ Where specific issues have been identified, a work programme will need to be agreed to effect change. As mentioned above this could have a number of facets. It is likely that the various stakeholders will be either defensive or aggressive and therefore in order to effect change, a programme of addressing the facts, resistance to change, acceptance of the need for change, developing solutions and then integrating these into the standard way of working.
  - ➤ Some of these steps may be "simple" in that there could be engineering changes

     change the ventilation from Force to Exhaust whilst others will require a
    much longer process

We can assist with these steps though, as mentioned earlier, we will need the buy in of the various parties. Can this be achieved?

I am in the UK this week; Moscow next week. I would suggest that the next step would be a conference call to discuss the approach, followed by an outline proposal and then a meeting in Tblisi to agree the project scope, budget, deliverables, etc.

We hope we can be of assistance as we believe that mining should be a safe and respected industry.

Regards

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To: Jeff PARSHLEY Chairman and Corporate Consultant SRK Consulting

Dear Mr. PARSHLEY

First of all, on behalf of the Labour Condition Inspecting Department of the Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs of Georgia, let me to greet you.

As you might know, in Tkibuli/Georgia there are two active coal mines in operation, Mindeli mine and Dzidziguri mine. Coal mining in this area has started from the 19th century. Currently, from 2006 mines are operated under the "Saknakhshiri" (GIG Group) LTD.

It's very regretful to mention that during last several years, mines hold leading places in occupational accident field. As for example, in 2018, 12 miners have died and several injured in Tkibuli.

Coming out from this situation, International Labour Organization (ILO), suggested your organization as consultant that can assist ILO tripartite constituents in Georgia in improving working conditions in Saknakshiri (GIG Group) LTD and can also provide expertise in the areas of mine management and operation practices and systems.

Thus, based on above mentioned issues, we kindly ask you, to notify us if you are ready to engage in consultation process for Saknakshiri (GIG Group) LTD in Tkibuli mines and provide your invoice paper mentioning all of the costs, number of engaged experts/specialists and duration period and other issues related to these procedures.

Hope to hear from you soon.

Sincerely,

Grigol Tchkadua

Labour Condition Inspecting Department

Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs of Georgia

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