

**Ayuba Wabba**

President  
Président  
Präsident  
Presidente

**Sharan Burrow**

General Secretary  
Secrétaire générale  
Generalsekretärin  
Secretaria General

**Mr. Imran Khan**

**Prime Minister of Pakistan**  
**Prime Minister's Office Islamabad**  
**Constitution Avenue, G-5/2 Islamabad**  
**Islamic Republic of Pakistan**  
**By email**

**HTUR/MW**

**23 September 2020**

Dear Prime Minister,

The International Trade Union Confederation (ITUC), representing 200 million workers in 163 countries and territories worldwide, deplores the mine accident on 7 September in Mohmand district of Khyber Pakhtunkhwa province causing at least 24 deaths and serious injuries amongst the mineworkers. We note with outrage the repeated failure of your government to put in place effective regulatory measures to stop the mining sector from being a death trap for more than 30,000 mineworkers in the country.

The ITUC expresses full support to our affiliate in Pakistan, the Pakistan Workers' Federation (PWF), as well as the IndustriALL Global Union Federation and the IndustriALL Pakistan Council (IPC) in calling on the government of Pakistan to initiate prompt inquiries into this and other mining accidents, to ensure compensation for victims and their dependents, and above all, to ratify ILO Convention No.176 on Safety and Health in Mines without further delay.

The mines in Pakistan remain some of the most dangerous and unregulated workplaces in the world for workers. Mining operations and working conditions are sub-standard, safety and health measures are non-existent, and reliable statistics are absent. As noted by the PWF, at least 399 mining accidents have been recorded between 2010 and January 2019. The Mines Act of 1923 is obsolete, not compatible with ILO Convention No.176, and not even respected by the mine owners, the contractors and the competent authorities. There is barely any arrangement for independent inquiries to ensure accountability, nor does a compensation framework exist to address the plight of victims and their families.

The PWF, the IPC and IndustriALL Global Union have, on numerous occasions engaged the Ministry of Overseas Pakistanis and Human Resource Development (MOPHRD) and the Employers' Federation of Pakistan on mining safety, and have stressed the urgent need for ratification of Convention No.176 in particular. The social partners in the tripartite meetings held during the International Labour Conference and the ILO Governing Body meetings in 2018 and 2019 recommended ratification of Convention No. 176 without delay.

Apart from reviewing the gap analysis undertaken by the ILO Country Office in Pakistan, the government has not taken affirmative action on ratification. Nor has the government initiated domestic reforms in the sector with social partners.

It is the obligation of the government of Pakistan under article 2 of ILO Convention No.144 on Tripartite Consultation to consult social partners on the implementation of international labour standards (ILS). Good faith use of effective consultation includes regular review and promotion of the un-ratified conventions under article 5(1). Yet the government has failed to report the matters on ILS discussed in

the federal and provincial tripartite consultative committees (Direct request, CEACR, adopted 2018). We recall that unjustified delay to obstruct the process is an infringement of Convention No.144 and a breach of good faith consultation especially if the matter is of consensual importance to the social partners.

Mr. Prime Minister, mineworkers and their families are paying the price of maintaining an unsustainable mining industry in Pakistan. The ITUC urges your administration, as a matter of priority, to instruct the MOPHRD to initiate ratification of ILO Convention No.176 in the October session of the Federal Tripartite Consultative Committee meeting. This should be done in parallel with the domestic process of legal framework review and technical engagement with the ILO, and must include provisions for ensuring compliance with the standards set, as well as sanctions and compensation where they are breached, especially where injuries result.

The ITUC further supports the PWF's proposal and calls upon your administration to establish district oversight committees composed of tripartite and legal representatives headed by the district judge as a first step to reforming the legislative and implementation framework on mining safety. Such committees should be empowered to conduct independent inquiries and issue punitive orders over mining accidents in a time-bound framework over all the mining areas in the country.

We look forward to receiving a response from your administration to the concerns raised in this letter.

Yours sincerely,



General Secretary

Copy to:

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