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Pakistan Central Mines Labour Federation (PCMLF) is read Draft Methodology and appreciate The Responsible Mining Foundation which is take initiative and best step for mine condition and mine workers. Therefore, It is worth to mention here that **Mine workers** are working in hazardous work field for the industrial growth of our country (Pakistan) especially Balochistan Province. They are living in miserable conditions because laws and rules are not properly implemented since the independence. They are far away from the basic needs of life even though the work place is also very dangerous where they work for many hours in a day. Many of them have lost their lives in different accidents (Please see the list below).

Baluchistan is the biggest province of Pakistan (regarding area) situated on the southwestern part of the country. It consists about 44% of the total land mass of Pakistan. There are lots of natural and renewable resources; in comparison of other provinces, it is the second leading supplier of natural gas in Pakistan. The Geologists, Researcher and Mining Engineers have found around 38 to 45 types of minerals here. Some of them are: coal, copper, lime stone, marble, iron ores, gold, uranium, gas, gypsum, silver etc.

According to International Labor Organization (ILO) In Balochistan (Pakistan) there are more than one hundred thousand underground coal mining workers & approximately 80 to 90 thousands employed on the surface with loading, unloading and transportation mine workers directly engaged in this industry particularly in coal mines. The mine structure is based on the no of larger companies and leases. This is due to the fact that mining in Balochistan is done in the dept (aprox, 4000 feet and with vertical shafts.) the underground work is therefore extremely dangerous and causes many accidents and occupational diseases. Every year the number of accident reported at work place is about 1500 to 2000 approximately 98 deaths and more than 350 sever injuries occur and other minerals like Marble Chromites, gypsum, etc there are 20 to 30 thousands underground workers and 10 to 15 thousands are surface workers.

Pakistan Central Mines Labour Federation and All Pakistan Labour Federation (APLF) draw you kind attention towards the critical working and living condition of the workers of the Mining and Gadani Sheep Breaking in Balochistan.

1. Coal-mining is an important industry in Pakistan. The activity is being carried out in different parts of the country; in certain districts of Punjab, Sindh, Baluchistan and Khyber Pakhtoonkhawa. Coal-mining is operated through primitive labour-intensive technology, whereby, the coal veins are blasted using explosives and the coal is hauled out of the mines using donkeys and manually driven carts. The activity poses grave risks to the safety and health of the workers. The main health and safety hazards faced by the workers in this sub-sector can be classified into following categories:

- Exposure to poisonous gases during underground mining;
- Exposure to high levels of coal and other mineral dusts during excavation and hauling affecting the respiratory system of workers;
- Risk of accidents due to fall-out from explosions, falling boulders, lack of proper lighting, and tripping & struck off hazards; and
- Musculoskeletal problems due to lifting of heavy loads.
- 2. Due to neglect of precautionary health and safety measures in coal-mining, accidents are common which usually result in loss of precious lives recorded by PCMLF & IndustriALL Global Union. Some major fatal accidents occurred during the last few years are:
 - In February, 2015 eight coal miners were killed when a coalmine in Loralai district, Balochistan collapsed;
 - On 21 March 2011 at least 45 miners died due to an explosion in a coal mine in Surran range Baluchistan some 35 km east of the provincial capital Quetta.
 - On 14 of February 2011, 2 Chinese engineers died in a chromite mine collapse in Qila Saifullah, Baluchistan; and
 - On 27 May 2004, 15 miners died after a gas explosion at a coal mine in Baluchistan.
- 3. A survey on coalmines working conditions in Balochistan conducted by All Pakistan Labour Federation (APLF) in collaboration with ILO in 2013 shows that 92 & 50 workers died in coal mine accidents during the years, 2011&2012, respectively, in Balochistan only.
- 4. Pakistan Central Mines Labour Federation (PCMLF), affiliating most of the trade unions registered in coal mines in Pakistan and thus the most representative workers' organization in respect of coalmine workers in Pakistan, believes that there is an urgent need to address the OSH and working conditions issues of the coalmine in Pakistan. We are determined to address the issues confronting to mine workers which are posing real threat to their livelihood and endangering their lives.