



Embamunaygas

Summary

There are a number of noted human rights allegations related to Embamunaygas and its contractors, including:

➔ Corruption:

Embamunaygas was accused of corruption in an anonymous letter from 2013. In 2010, workers said they were enrolled with the ruling Nur Otan political party without their knowledge or consent.

➔ Unions and Labour Rights:

Allegedly, more than 5,000 workers were forced to join a particular trade union under threat of 'deprivation of social benefits'. In 2010, workers requested a pay increase due to hazardous working conditions. The workers sought to create their own independent trade union, accusing the official union of not supporting their interests. Workers also said they had not received an employment contract which is a violation of the law.

➔ Environmental Degradation and Pollution:

Within the span of a year and a half, the company burnt at least 1.3 million cubic meters of raw gas with high sulphur content. Concerningly, sulphuric gases can be highly toxic for the human body. A 2016 inspection found forty-three violations of environmental law.

Embamunaygas has publicly available policies about the environment and occupational safety. The company did not respond to our questionnaire of its human rights policies and commitments.



Country: **Kazakhstan**



Website



BHRRC company page

Human Rights Commitments

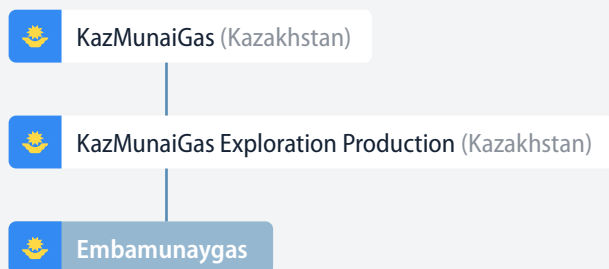
- + [Information disclosure](#)
- + [Policy in the field of labor protection, industrial, fire safety and environmental protection](#) (Russian)
- + [KazMunaiGas's "Golden Rules"](#) (Russian)
- + [Guidelines for the management system in the field of health, industrial safety and environmental protection](#) (Russian)
- + [Environmental impact assessments](#) (Russian)
- + [Use of water resources](#) (Russian)
- + [Water management commitment](#) (Russian)
- + [Water management manual](#) (Russian)
- + [Impact on atmospheric air](#) (Russian)
- + [Emission management policy](#) (Russian)
- + [Waste management](#) (Russian)



Company Information

Embamunaygas is a subsidiary of the state oil company KazMunaiGaz. The company oversees six 'production divisions': Zhayikmunaygas, DossorMunayGas, Kainarmunaygas, Zhylyoimunaygas, Embamunaygas Management and a procurement management division. Oil extracted by the company is exported via the Caspian Pipeline Consortium and the Uzen-Atyrau-Samara pipelines.[↗]

COMPANY OWNERSHIP



Human Rights Allegations

Corruption

Embamunaygas was accused of corruption in an anonymous letter from 2013. The letter accused Embamunaygas of issuing contracts to companies with poor records; one awardee company had previously been paid by the government to build homes, all of which were of poor quality and, of which, several collapsed. Other contracts were allegedly awarded for companies owned by well-connected businesspersons in the oil industry. The letter also claimed that the work completed by contractors was worth significantly less than they received; for instance, one contractor won a tender worth 361,431,900 tenge (\$861,020 USD), but the volume of work completed only amounted to 64,264,280 tenge (\$153,093 USD).[↗]

In 2010, workers said they were enrolled with the ruling Nur Otan political party without their knowledge or consent. They were charged membership fees for the party.[↗]

- + [Prevention of soil contamination](#) (Russian)
- + [Regulation on the organization of emergency medical care](#) (Russian)
- + [Policy on safe operation of land vehicles](#) (Russian)
- + [Plan for notification and action in case of occupational accidents](#) (Russian)
- + [Emergency response plans at field facilities](#) (Russian)
- The company **did not respond** to our questionnaire of its human rights policies and commitments

Human Rights Impacts

- ⚠ Health and safety
- ⚠ Environmental and water rights
- ⚠ Labour rights and wages
- ⚠ Corruption

Unions and Labour Rights

Workers and union leaders accused Embamunaygas of violating labour rights, particularly as related to union activities and freedom of association. Allegedly, more than 5,000 workers were forced to join a particular trade union under threat of 'deprivation of social benefits'. The company allegedly amended the collective agreement to say workers who were not members of the trade union would lose access to labour incentives, social support and other benefits. The Prosecutor's Office of Atyrau cancelled this requirement, citing it as a violation of the workers' right to remuneration for work without discrimination. Embamunaygas denied the allegations, saying that workers were not obliged to join the union. [↗](#)

In 2010, workers requested a pay increase due to hazardous working conditions. In a press statement, employees said, 'The Embamunaygas production branch, where we work, is officially considered a particularly hazardous production facility; in addition, the environmental situation in the region is deteriorating. Constant inflation, rising utility bills do not give us the opportunity after hard work in harmful conditions to improve our health, to achieve a high-quality and prosperous life.' The workers sought to create their own independent trade union, accusing the official union of not supporting their interests. Workers also said they had not received an employment contract which is a violation of the law. [↗](#)

In another incident, workers at the Prorova field signed a letter claiming that work contracts had been violated, particularly via the illegal extension of work days. [↗](#)

Environmental Degradation and Pollution

Embamunaygas has been fined for air pollution from excessive gas flaring. The company burnt at least 1.3 million cubic meters of raw gas with high sulphur content. A gas processing complex operated for a year and a half without a functioning desulphurization system. [↗](#) Even after environmental authorities caught the violation, the company allegedly continued to pollute the air, pending enforcement of a court decision. The company was fined for emissions from November 2017 to October of 2018; notably, the court reduced the fine by 25%, the equivalent of several billion tenge. [↗](#) [↗](#) [↗](#) Concerningly, sulphuric gases can be highly toxic for the human body. The U.S. Agency for Toxic Substances and Disease Registry has classified hydrogen sulphide as a neurotoxin, and intense exposure to it can cause death or severe illness. [↗](#) Similarly, sulphur dioxide is linked to breathing problems and to cardiovascular disease. [↗](#)

This was not the first time the company had been fined for air pollution. The company was similarly fined for gas flaring in 2014; the fine was also reduced at that instance. [↗](#) A year prior, the company was sent to court for illegally burning gas at several oil fields. [↗](#) A 2016 inspection found forty-three violations of environmental law. [↗](#)

Human Rights Commitments

Embamunaygas has a number of publicly available commitments and guidelines related to the environment, labour and human rights, including:

- ➔ [Policy in the field of labor protection, industrial, fire safety and environmental protection](#) (Russian)
- ➔ [KazMunaiGas “golden rules”](#) (Russian)
- ➔ [Guidelines for the management system in the field of health, industrial safety and environmental protection](#) (Russian)
- ➔ [Environmental impact assessments](#) (Russian)
- ➔ [Water management commitment](#) (Russian)
- ➔ [Water management manual](#) (Russian)
- ➔ [Emission management policy](#) (Russian)
- ➔ [Regulation on the organization of emergency medical care](#) (Russian)
- ➔ [Policy on safe operation of land vehicles](#) (Russian)
- ➔ [Emergency response plans at field facilities](#) (Russian)

According to the company, ‘Embamunaygas strives to meet the highest standards of industrial safety and is aimed at continuous improvement of the management system for labor protection, industrial, fire safety and environmental protection as a key element of effective production management. The main goals of Embamunaygas in the field of labor and environmental protection are: zero accidents, accidents and spills; the lowest possible negative impact on the environment’.

In the realm of health and safety, the company says it aims to ‘identify, assess and effectively manage risks in the field of labor and environmental protection at all stages of production activities; guarantee employees the right to refuse to perform and stop work that endanger the life and health of the employees themselves or the people around them; to provide continuous training and professional development of employees on health and safety issues; provide employees with the necessary resources and equipment to ensure their protection from industrial risks and preparedness to act in emergencies and emergencies’.

In the realm of environmental protection, the company says it aims to ‘ensure the trouble-free operation of all equipment and oil pipelines in order to minimize the risks of environmental pollution in accidents and oil spills; take measures for the restoration, protection and sustainable management of lands prone to desertification; prevent illegal hunting, fishing and other use of flora and fauna by its employees, as well as employees of contractors and subcontractors on the EMG contract territory; when planning and implementing production activities, take into account the impact on biodiversity, preserve the migration routes of animals; to implement and follow the principles of “green office”; additionally conduct a strategic environmental assessment of the impact on the environment and a risk assessment in the event of the implementation of large infrastructure projects or work in environmentally sensitive areas; reduce emissions of pollutants from stationary and mobile sources; fully compensate for the damage to the environment from the negative impact of the company’s activities; be responsible for the decommissioning of production facilities and ensure the subsequent reclamation of the territory and bringing it to a state as close to natural as possible; not to carry out activities in specially protected natural areas of particular value as a habitat for rare and endangered and valuable species of animals; rational use of natural resources’.

Embamunaygas did not respond to our questionnaire of its human rights policies and commitments.