

# GLENCORE

Laura Waldman and Marti Flacks  
Business & Human Rights Resource Centre  
1-3 Charlotte Street, 3rd floor  
London W1T 1RD  
United Kingdom  
*Via email to Laura Waldman (waldman@business-humanrights.org)*

3 July 2018

Dear Ms Waldman and Mr Flacks,

Thank you for providing Glencore with the opportunity to respond to allegations of toxic fumes and worker safety in Zambia.

Glencore has had a presence in Zambia since 2000, when we acquired a shareholding in Mopani Copper Mines (Mopani) through a competitive tender. This was part of a general privatisation of Zambian copper mining assets, supported by the World Bank.

Prior to privatisation, Mopani experienced years of under-investment, safety performance was poor and its smelter had been emitting sulphur dioxide (SO<sub>2</sub>) unconstrained for over seventy years, with a significant effect on local air quality. To date, its corporate shareholders have spent over \$4 billion in redeveloping and expanding operations.

## Safety

At all of our operations, we believe that all occupational fatalities and injuries are preventable, and that we can create and maintain safe workplaces for all our people with strong safety leadership.

We inform our people that we expect every individual, both employees and contractors, to take responsibility for their own safety and for that of their colleagues and host communities. All our performance data and targets relating to health and safety include contractors as well as employees.

We expect our contractors to comply with the same safety requirements as our direct employees, and to meet our safety training standards. We have a contractor management system in place to see that contractors comply with our requirements.

In 2016, as part of our SafeWork programme, Mopani launched a safety campaign, "*Doing it Right*", aiming to clearly define its expectations and empowering supervisors to put the SafeWork principles in place.

The primary focus of Mopani's sustainable development academy is contractor management and pre-employment screening. This includes reviewing medical status and fitness for work, safety training, regulatory competencies, induction and training for special risk jobs eg working at heights. Mopani treats its contractor employees in the same manner as its direct employees.

## **Glencore plc**

Baaremattstrasse 3, P.O. Box, CH-6341 Baar, Switzerland  
**T** +41 41 709 20 00 **F** +41 41 709 30 00 [www.glencore.com](http://www.glencore.com)  
Registered in Jersey with number 107710

Registered address: Queensway House, Hilgrove Street, St Helier, Jersey JE1 1ES

### Air emissions

In 2014, we completed a US\$500 million, multi-year smelter upgrade project, 15 months ahead of the schedule agreed with the Zambian government. Mopani's new state of the art smelter has increased production, maintained job stability, and now captures in excess of 95% of all emissions, well within the limits accepted as being world-class for copper smelters.

Mopani has established remote, real-time monitoring stations for SO<sub>2</sub> emissions in its surrounding communities; the measured levels of SO<sub>2</sub> at the monitoring stations are well below the Zambia Environmental Management Agency (ZEMA) guideline limit for 24 hour-averaging periods in respect of ambient air. Mopani sends monthly reports on the emissions data collected from these monitoring stations to ZEMA, who make these reports publicly available upon request.

However, there have been a few instances where these limits were exceeded for a short period during the smelter start-up following maintenance closures. Mopani has established a system to inform the community about possible increases in emissions each time there is a restart.

Since 2015, as an additional mitigation measure, Mopani agreed with the community to station a medical team in the community for the duration of the start-up to attend to community members who may be affected by the slight increase in emissions during the restart process. To date, we have received no complaints from the community.

Mopani is committed to maintaining a safe workplace for all of its employees and contractors, which includes managing and mitigating its environmental impacts. Mopani, looks forward to continuing its constructive and transparent relationship with its local communities as well as regional and national government representatives.

Kind regards,

Anna Krutikov  
Group Head of Sustainability