

From: Dana Sadykova, Karaganda Ecological Museum NGO
To: Charlotte Wolff, Arcelor Mittal
Cc: Liz Smith, EBRD
Date: Wed, 23 Dec 2009 12:10:45 +0300
Subject: Re. ArcelorMittal Stakeholder Engagement Plans

Dear Ms Wolff,

Further to our recent meeting held at the EBRD, we are writing with regard to the point raised about the information to be disclosed under ArcelorMittal's Stakeholder Engagement Plans.

Given the major impacts of a steelmill or mine on its surrounding community, and the need to build trust with stakeholders while investments are being made whose results may take some years to show clear results, we would like to see a commitment to disclose the following information:

Disclosure of documents:

- 1) Environmental and Social Action Plans
- 2) Implementation reports on Environmental Action Plans.
- 3) Health and Safety Action Plans including intended investments and timelines.
- 4) Disclose implementation reports on Health and Safety Action Plans.
- 5) Resettlement Action Plans, where they exist
- 6) Agreements or draft agreements between the company and local or national authorities giving permission for delays or cuts in investments regarding the environment or health and safety.
- 7) Agreements for the sale of facilities to ArcelorMittal, or at least the parts outlining any environmental commitments to be undertaken as well as parts outlining any economic incentives such as tax exemptions being granted to the company.

Where any of these contain commercially confidential information, the relevant information should be redacted and the document disclosed.

Environmental and social information:

- 1) Where the release of pollution emissions information is not yet regularly undertaken, data on air and water emissions and hazardous waste generation covering all relevant harmful substances for at least the last ten years, where available.

Graphs are useful but the original data is also needed. This should be published in a format that shows progressions over time, along with production figures over the same period, so that it can be ascertained that reductions are not just due to a decrease in production. The information given should be split up into separate substances and should include not only common pollutants such as SO₂ but also ones which occur in smaller quantities (eg. for steelmills, heavy metals (particularly arsenic), PAHs (benzo(a)pyrene) and dioxins.)

2) Data on health and safety issues from the plants and mines – on the number and type of incidents per year and per 1000 workers per year for at least the last ten years.

3) Information on what standards the company is aiming to reach and by when. For example regarding air pollution, by when a steelmill is expected to reach EU standards.

As we discussed at the meeting, we also believe that it is essential for the development of the Stakeholder Engagement Plan itself to be based on consultation with stakeholders, in order to clarify expectations and build trust.

We look forward to more progress with the ArcelorMittal Temirtau Stakeholder Engagement Plan soon,

Yours sincerely,
Dana Sadykova

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