



**THE EVALUATION OF HUMAN  
RIGHTS RISKS IN NATURAL STONE  
EXTRACTION AND PRODUCTION  
ACTIVITIES IN TÜRKİYE**  
REPORT FOR TRUSTONE INITIATIVE  
OCTOBER 2023

THIS EVALUATION REPORT PRESENTS THE FINDINGS OF THE AUDITS CONDUCTED AT SELECTED NATURAL STONE QUARRIES AND ENTERPRISES ENGAGED IN PRODUCTION ACTIVITIES IN TURKEY. IT IS WRITTEN BY AN INDEPENDENT RESEARCHER (A FOREST ENGINEER), WITH THE COOPERATION OF BUILDING AND WOOD WORKERS' INTERNATIONAL. IT IS AN ASSIGNMENT COMMISSIONED BY THE CIVIL SOCIETY ORGANISATIONS INVOLVED IN THE TRUSTONE INITIATIVE.

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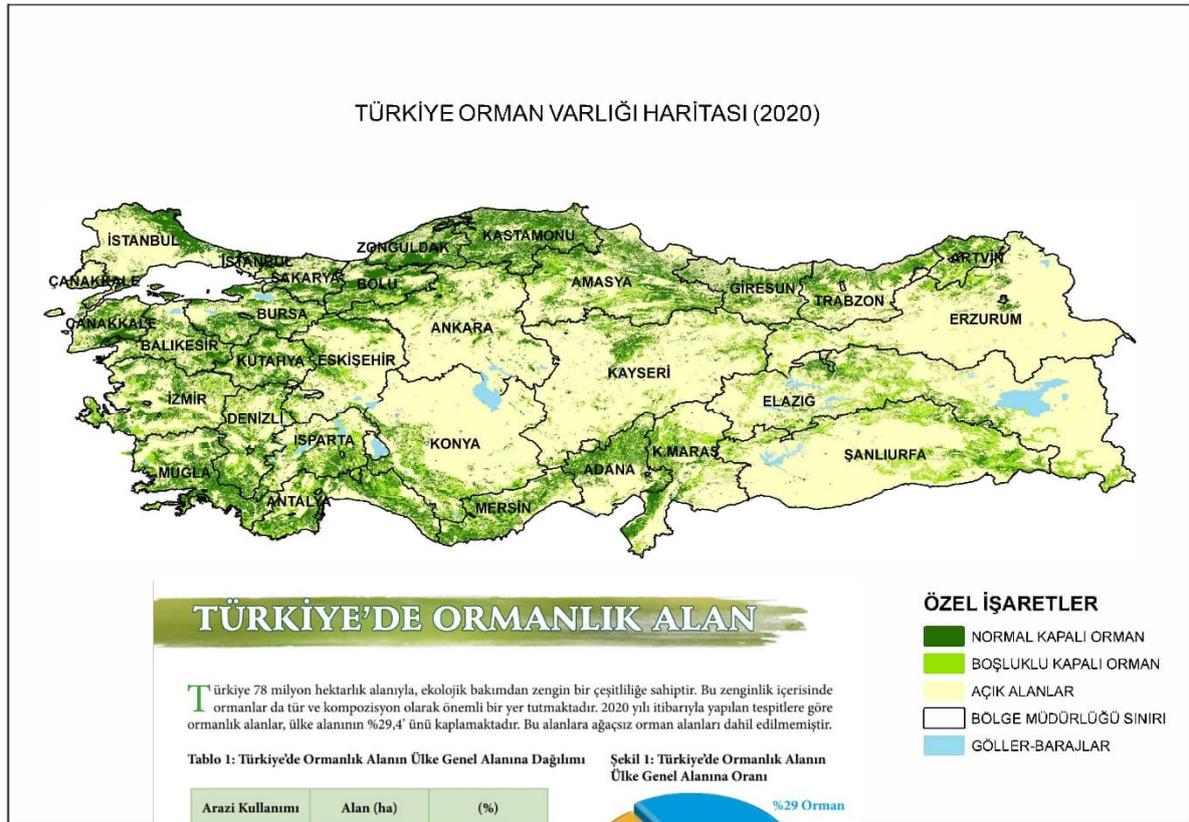
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# REPORT ON THE EVALUATION OF HUMAN RIGHTS RISKS IN NATURAL STONE EXTRACTION AND PRODUCTION ACTIVITIES IN TÜRKİYE

PHASE 1  
15 December 2022

## 1. OVERVIEW

The General Directorate of Forestry is a public institution affiliated with the Ministry of Agriculture and Forestry that has a special budget and legal entity status. The structure of the General Directorate is composed of 30 Regional Forestry Directorates and management is handled via these regional directorates. The purpose and scope of mining activities as part of Turkey's forestry activities are specified in governing regulations as per Article 16 of the Forestry Law no. 6831. Pursuant to these regulations, and to Article 7 of the Mining Law no. 3213, forestry permits are required for production activities conducted on the basis of a license in the areas classified as forests. Of the total 78 million hectares of surface area in Turkey, forests represent 29.4%, with 22,993,000 hectares being fertile soil.



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Although 29.4% of the total area in Turkey is reported to be fertile forests, this number goes as high as 50% when areas at the state's discretion and disposal are taken into account. These areas, despite not having trees, are illustrated in green in forest designation maps and remain within the territories of specified forests.

Excluding mining activities performed on private property and non-forest areas, there are **12,305** mining permits that allow enterprises to operate quarries in a total forest area of **30,337.67 hectares**. The ratio of land for which mining activities have been permitted within boundaries of fertile forests is 7.5%.

Located on the Alpine Belt, which hosts the world's richest natural stone formations, Turkey has diverse and abundant mining reserves. In addition to these reserves, Turkey ranks among the world's most important natural stone producers with its developing industry and technology deployed in production. These critical reserves span a large area across Anatolia and Thrace. Afyonkarahisar, Bilecik, Balıkesir, Denizli, Muğla, Burdur, Amasya, Elazığ and Diyarbakır are provinces where reserves are mostly concentrated. In Turkey, reserves include more than 80 different types of stone structures, in addition to over 120 different colors and patterns.

When one looks into the added value from Turkey's position as a key exporter coupled with negative developments, they might hardly argue that public good is prioritized. Indeed, marble is extracted by causing severe health, safety and environmental problems, and sold abroad in the form of blocks at cheap prices without being processed. That is the reason harm caused by it will be a burden across generations. One must also admit that such activities will not be sustainable if carried out without setting right mining strategies and plans, handled in a manner contradicting the science and technique of mining and disregarding public good. Environmental organizations and villagers in Turkey have protested in a variety of ways and filed cases against enterprises to fight against the rapidly rising number of quarries and environmental pollution that they inevitably have caused.

Currently there are 12,305 operating quarries; 5,382 enterprises whose license is canceled, and 32 enterprises whose application is rejected. Special permission has been obtained from the General Directorate of Forestry so as to access this data from the Forestry Information Center (ORBİS) and the reports of the Council of State.

LICENSE STAGE	GROUP I(b)	GROUP II(a)	GROUP II(b)	GROUP II(c)	GROUP III	GROUP IV	GROUP V	TOTAL
<b>Number of Enterprises (as of April 4, 2022)</b>	582	2,834	2,906	73	65	3,311	8	<b>9,779</b>

According to the data of the General Directorate of Mining and Oil Works (MAPEG) (as shown in the table below), a breakdown of the licenses per mineral reveals Group II-B, which also involves marble operations, as the group with highest number of operating and searching licenses (the Group represents stones produced in blocks such as Marble, Travertine, Granite, Andesite, Basalt, as well as natural stones used for decorative purposes).

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Name of Mineral	NATURAL STONE PRODUCTION		
	2021	2020	Unit
<b>Ignimbrite</b>	67,048.075	53,632.59	Ton
<b>Marble</b>	13,064,115.48	10,749,743.69	Ton
<b>Onyx</b>	36,668.67	36,594.95	Ton
<b>Travertine</b>	3,562,588.42	2,582,423.50	Ton

### 1.1 Production Conditions and Employment

Open-pit mining is the production system generally in use for quarries where natural stone and marble are extracted. This operating method involves such procedures as obtaining big blocks with heavy machinery, and cutting, and polishing stones.

The production method at open-pit mines is stepped, where production takes place between the downward and upward benches. The stone is reached by stripping the overburden of the hill and using a cracker. The purpose here is to retrieve straight, square, or rectangular blocks without crumbs. The steps where these blocks are retrieved are benches. These benches must be 3-meter wide and 7 meter-long to ensure occupational safety. It is mandatory to follow these dimensions. Unless these dimensions are followed, hazards that may occur will vary depending on whether the land is solid or clastic. These hazards include cracking or detachment of the stone; or collapses similar to landslides as the result of a clastic soil failing to endure the machinery. As the ore is retrieved, the number of benches should be increased, and miners should proceed from bottom to upper steps.

Mining activities cannot be carried out in autumn and winter in Turkey due to rainfall and snow. Topographic features of the country play a role in the absence of any production in these months. The impact of climate and topography on mining activities may be summarized as follows:

- Snowfall and/or rainfall result in the marble/natural stone retrieved being disfigured and cracked.
- As mines are located at highlands, no transport can take place in rainfall.
- At high altitudes where mines are located, average temperature in winter is below 0 Celsius degree, making production impossible.
- Sudden rainfall or snowfall can cause outage at construction sites.
- Winds in this period constitute a danger in terms of working at open pits.

Taking all these factors into account, mining in Turkey can be carried out in spring and summer. Number of workers employed in quarries is provided below.

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YEAR	NUMBER OF WORKERS			NUMBER OF WORKPLACES		
	PUBLIC	PRIVATE	TOTAL	PUBLIC	PRIVATE	TOTAL
2020	13.393	117.768	131.161	68	6200	6268
2019	12.352	110.592	122.944	50	6142	6192
2018	12.045	112.941	124.986	56	6121	6177
2017	12.600	117.923	130.523	53	6166	6219
2016	14.435	109.579	122.062	70	6185	6255
2015	13.672	109.121	122.793	71	6206	6277
2014	13.528	107.202	120.730	66	6148	6214
2013	13.879	119.777	133.656	89	6280	6369
2012	15.801	118.039	132.428	99	6202	6301
2011	16.398	115.941	131.051	97	6041	6138

Of 6,268 workplaces engaged in mining activities, 68 are public and 6,200 are private enterprises, while there are a total 13,161 formal workers at these workplaces.

In addition to *formal workers*, one can easily identify informal workers and child labor employed without any social security and registration particularly in spring and summer when production is at its peak.

In a country where minimum wage is TL 5,550, miners' average wage varies from minimum wage to TL 10,000. Pay also varies depending on whether the employee is an operator or a manual worker. Operators are paid higher wages compared to manual workers since they use heavy machinery and are limited in number.

Pursuant to Article 63 of the Labor Law no. 4857, number of hours worked weekly is 45 hours, and this duration shall be distributed evenly across workdays unless otherwise is agreed. Accordingly, daily work should be 7.5 hours in a workplace where people work six days a week. Quarries are observed to be implementing shifts. This system is composed of day shifts from 8:00 am to 4:00 pm, and night shifts from 00:00 to 8.00 am.

The necessity for the production to take place in a limited timeframe of 5 to 6 months results in workers' rights being violated in many aspects. To address the critical hike in demand, workers are asked to work long hours at quarries, while many of them are employed without social security, and child labour and informal workers are assigned to quarries distant from residential areas. In areas distant from residential places where the number of quarries is low, local communities are not presented the opportunity to choose, and they are forced to accept the terms imposed on them by the employer. In a period of five or six months where no production takes place, workers' fate is at the mercy of license holders and is shaped by the region they are in.

In terms of organizing, mining and quarries sector are considered separately from construction and forestry. There are eight trade unions organized in the private sector; however, the number of unionized workers has dropped sharply due to the privatization of the majority of enterprises in the past two decades. The official figures released in July 2022 show that there are 222,067 formal workers in the sector, while the total number of unionized workers is only 41,838. The largest union in the industry is the Mine Workers Union of Turkey

(TÜRK MADEN-İŞ) with 28,635 recruited members. In spite of the figures presented here, no workplace where we paid a visit for the risk analyses performed was unionized. Employers' general attitude vis-a-vis unionization is averse.

## **1.2 Occupational Health and Safety**

With its marble reserves and quality, Turkey enjoys a significant position among the world's potential marble reserves. Marble-quarry operations heavily rely on manual labor. Since marble-quarries are generally small scale in Turkey, occupational health and safety measures are monitored insufficiently.

Research of Turkey's Statistics Institution (TÜİK) designates quarries for natural stones and marbles as the sector with highest number of occupational accidents. Turkey is among the countries where the death toll resulting from mining accidents is highest. In China, the world's biggest coal producer, death toll per 100 million tons in 2008 was 127, while it was 722 in Turkey.

In other words, Turkey's mining sector and quarries eat people away and spit money out. Miners all but dig their own graves only to satisfy greedy license owners and bring money back home. Each time their digging tools hit the soil; it should target the chest of those who profit from their labour.

There is no official authority working to improve miners' working conditions in Turkey. Risk analyses should be carried out and reasons that may constitute a hazard or error risk identified to make marble quarries operations a more reliable activity in terms of occupational health and safety. Risk analysis is one pivotal work to eliminate any risk of death, injuries and material that may result from occupational accidents.

The opposition party's proposal at the Grand National Assembly of Turkey to investigate mining accidents was rejected by majority of the votes of the ruling party.

As one miner said:

There is death down there, and hunger outside. Death is a probability, but hunger is a fact.

## **2. METHODOLOGY**

The inspector conducted a quantitative study to understand and report the characteristics of the general situation and practices in Turkey's natural stone quarries and practices. She intended to conduct due diligence at the key workplaces of the industry by prioritizing the provinces, districts and enterprises designated by TruStone and its members. Therefore, in addition to references, the provinces of Afyonkarahisar, Burdur, Bursa, Denizli and Bilecik were chosen and visited as Turkey's leading marble and natural stone quarries are located in those provinces. For enterprises to be examined in addition to the quarries designated by TruStone members, the method utilized involved review of their mining licenses and specifying locations from the map.

Since the study had to be completed in two months, the inspector prioritized field visits and was successful to have one on one meetings with workers, managers, and the representatives of the General Directorate of Forestry. Designed to obtain detailed information, questions posed at interviews included working and accommodation conditions, and production targets. These interviews, as well as the search of available sources on the matter were aimed at understanding quarries' license/registration status, occupational accident records, harm to the environment, and interaction with local communities.

Before each visit, the inspector tried to reach quarry owners or managers and brief them on the subject matter so as to enter the targeted quarries and have one on one talks with

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workers. In cases where preliminary communication was not possible, she contacted rangers or the representatives of the General Directorate of Forestry in the relevant province and district to ensure her access to the field.

Meetings were held with the president and members of the Civil Servants' Union of Agriculture, Forestry, Husbandry and Environment Sectors (TARIM ORMAN-İŞ) as for the status of workers' rights and licenses at these quarries, and their environmental impact.

Field visits and meetings were completed in October and November.

### 3. SITUATION IN QUARRIES

#### List of Quarries Where Field Work was Conducted

Location	Name of Quarry/Enterprise	Average Number of Worker	Person(s) interviewed	Data collection methods used
Nilüfer, Bursa	A	45-50	Site manager	Face to face interview Field inspection
Altıntaş, Kütahya	B	13	Gateman	Face to face interview Field inspection
Altıntaş, Kütahya	C	8		
Altıntaş, Kütahya	D	9		
Karamanlı, Burdur	E	25-30 / 50 - 60		
Karamanlı, Burdur	F	No information obtained	Worker	Face to face interview Field inspection
Karamanlı, Burdur	G	20-30 / 100		
Kocapınar, Burdur	H	No information obtained		
Kocapınar, Burdur	I	10-50		
Denizli	J	250-300		
Denizli	K	20-25/shift		
Afyonkarahisar	L	20-30/shift		
İsçehisar, Afyonkarahisar	M	No information obtained		
Afyonkarahisar	N	50		
Söğüt, Bilecik	O	No information obtained		

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### 3.1 PROVINCE: BURSA DISTRICT: NİLÜFER ENTERPRISE: A

Class B and C marbles are retrieved at this quarry. There are teams of 45 to 50 people in periods of active production. As it was the end-of-season, teams had been made smaller and shift work ended. Energy transmission lines were installed with insulated cables.



### 3.2 PROVINCE: KÜTAHYA DISTRICT: ALTINTAŞ ENTERPRISE: B



Currently, a team of 13 people is working at the quarry.

Occupational safety signs were available at the work site. Majority of workers are people from Sivas province, which is nearby, and from Oysun village located in Afyonkarahisar.

As can be seen in the photo on the left, workers' accommodation is provided in the form of containers. Workers are responsible for their accommodation and personal hygiene. They wash their dishes and clothes themselves, by hand.

There is no occupational accident or a

safety-related negligence in the history of this quarry. Average age of workers' ranges from 22 to 40. The youngest is a 22-year-old operator who started work when he was a high school student. As it is low season, their production activities are not intensive. Many workers were made redundant a few months ago because production is not at its peak.



Bench widths and heights are not compliant with the regulations. There are benches as high as 9 meters although the required height is 5 to 7 meters. It is possible to see the general situation of the quarry in the photos that follow.

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### 3.3 PROVINCE: KÜTAHYA DISTRICT: ALTINTAŞ ENTERPRISE: C



Deploying project-based production, this quarry has been engaged in production since 1996. The firm produces a diverse range of marbles.

Teams of 8 people work in each shift. Average age of workers ranges from 20 to 40, and they are mostly from the villages of Afyonkarahisar. There are two operators among workers. No occupational accident has been entered into records in the quarry's history. Workers reported that they get paid on time.

Accommodation is provided in healthy concrete buildings. There is a kitchen in the concrete building where dorms are located, in addition to a cook who daily cooks meals for workers. Heating is either handled by electric heaters or wood heaters. I have not entered toilets as access was possible only from the dorms. Workers' personal belongings were there.

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Benches for production are not compliant in terms of height and width.

As can be seen in the photos, defects related with energy transmission lines were spotted during the inspection and they could result in wildfires.

This photo clearly shows cables from the electric pole that transmit power to the quarry extend above trees. Cables were also observed to be in touch with many trees when examined. Despite the use of insulated cables, it constitutes a danger since they could result in wildfires.



Representative of the quarry called the gateman and warned them to fix the issue. Once this firm rejected our request for a visit, the field work was only possible after forest rangers were appointed by the Forestry Operations Department to keep the inspector company.

The general situation with the quarry is demonstrated in the photos below.



**3.4 PROVINCE: KÜTAHYA DISTRICT: ALTINTAŞ ENTERPRISE: D**



The quarry was incepted only six months ago. Therefore, a full-time production activity has not yet started. Production is currently handled by a team of nine people. With an average age at 26 - 56, workers come from Afyonkarahisar and its districts.

At the quarry whose forestry permits have been issued, teams work for long time periods of 12 hours, which contradicts the Labor Law no. 4857. Accommodation is in containers. The same set of containers is also organized for kitchens, toilets and bathrooms. For their personal hygiene, workers use hot water from electric water heaters. Shift supervisor reported that the quarry's cook, who does a good job with cooking, prepares breakfast

and two meals a day. Workers were provided with Personal Protective Equipment (PPE) when they started work. Workers were seen to not wear helmets but protective shoes instead.

Benches/steps at the quarry were 14 meters high. This constitutes a significant danger. Along this 14-meter bench, if the soil is clastic during the production that involves crackers and chains (solid and clastic soil is intertwined in the quarry where work takes place at this height), breakaway may occur, causing workers and operators to be crushed under tons of debris of marble. Power lines stretch from the side of a drinking water reservoir, and a leakage was observed in it.

The company – as other companies - installed transmission lines through trees, which may cause wildfires and fatal occupational accidents.



**3.5 PROVINCE: BURDUR  
DISTRICT: KARAMANLI  
ENTERPRISE: E**

Production at this quarry is mostly travertine. A team of 25-30 persons is present when the production is low. In the peak season (summer), teams of 50-60 people work in shifts. In addition to project-based stones, intensive production of blocks is carried out at this firm, where Syrian and Afghan migrant workers deserve a

mention since they are reportedly formal workers at the firm.

Necessary signs for occupational health and safety are available. No occupational accidents have been recorded to date. Energy transmission lines and bench heights fail to meet healthy working conditions.

However, wage is paid on a regular basis and workers have easy access to clean water. Although providing regular meals to workers at a refectory, the firm offers accommodation in containers rather than brick-and-mortar buildings.

**3.6 PROVINCE: BURDUR DISTRICT: KARAMANLI ENTERPRISE: F**



When there are adjacent quarries (when there are quarries on either sides of the same border) - as is the case here-, job opportunities improve and competition among quarries rises,

helping to improve workers' working conditions, as well. Ensuring that production is efficient and continuous imposes a huge pressure on the employer to improve working conditions as they do not want to see other quarries steal their workers from them.

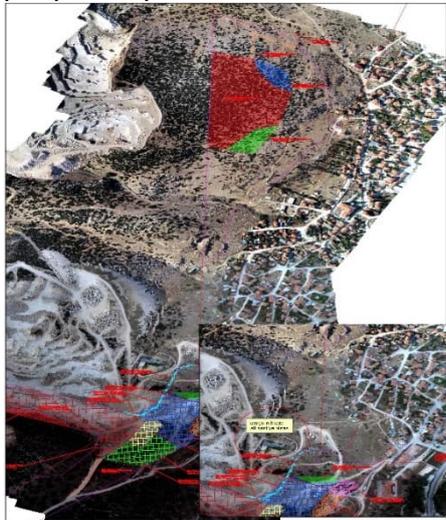
Fully guaranteeing occupational safety, the company also provides decent conditions of container dorms and refectories to workers. Access to clean water is easy. The interviewed worker did not want to reveal the total number of workers. The worker may have been warned by the employer or pressured into not disclose certain information. Wages are paid timely, while width and height of benches is ideal for rehabilitation.



The map image shows three mining areas of different companies.

**3.7 PROVINCE: BURDUR DISTRICT: KARAMANLI ENTERPRISE: G**

Manufacturing at Afyonkarahisar's İscehisar district, this firm engages teams of 20 to 30 people for production. It was a stagnant period when the visit was paid to the quarry. The



firm exports most of the stones produced (Burdur Beige is the most intensively retrieved stone). As can be understood from the map, the quarry is in a central spot in the district of Karamanlı, and thus conducts production in close proximity with local communities. Dust, pollution, and visible environmental harm quarry operations caused have been raised many times by the complaining members of the local community in the past ten years. However, the fact that there are over 20 quarries in the region prevents such complaints from being addressed. Burdur is a province where chromium and other minerals are heavily concentrated. Therefore, many inspections were conducted by environmental organizations and chambers, with the harm caused by the waste arising from mining operations on citizens' drinking water and

irrigation water specifically being reported.

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There is one report of an occupational accident in the quarry's records. Accommodation is in brick-and-mortar buildings. Up to 100 workers are employed to address peak demand in production in high season. Wage is paid timely.

### 3.8 PROVINCE: BURDUR DISTRICT: KOCAPINAR ENTERPRISE: H

Located in Kocapınar village of Burdur. Housing a construction site inside the quarry, the firm provides refectories to workers and offers accommodation in containers. The site is supervised by a female engineer.

With no records of occupational accidents, this quarry offers working conditions that are above average. No answer was received when the number of workers was asked. The firm guarantees high levels of occupational safety by employing an occupational health and safety expert. Workers' access to clean water is ensured via tanks. They also have access to electricity and hot water 24-7. Payments are made regularly, while foreign/migrant workers are not employed.

### 3.9 PROVINCE: BURDUR DISTRICT: KOCAPINAR ENTERPRISE: I

Located in central Burdur's Kocapınar village, this quarry fails to satisfy its employees in the way it conducts its operations. As a result of interviews with workers, the inspector understood the quarry employed no child labor; but wages were not paid on time. While this enterprise has quarries in Balıkesir, Isparta and Afyonkarahisar, its quarry in Isparta's Çandır district provides the largest production capacity.

Teams of 10 to 50 persons are employed in shifts during the season. Workers' average age varies from 20 to 50. No deadly accident has been recorded in the history of this quarry. A construction site is established in brick-and-mortar buildings in Kocapınar quarry, and workers' access to clean water is made possible via water supply tanks. It is adjacent to Haz-Mer's marble quarry.

### 3.10 PROVINCE: DENİZLİ DISTRICT: HONAZ ENTERPRISE: J

The company has quarries and a marble plant within the Denizli province. In addition, the firm has quarries in Burdur, Isparta and Afyonkarahisar.

At the enterprise in Denizli, some 250-300 people are employed during the high season, and all of them are from the local community. Although the activities are classified as seasonal, work required at the marble plant is 12 months a year. Working conditions at the quarry are above the average since the ultimate objective is to guarantee occupational safety. This is ensured by: keeping bench width and height at safe levels (3 m width/ 5-7 m height); preventing occupational accidents such as slipping and falling through placing blocks on the sides of the production aisles within the quarry; and identifying the cutting method according to the formation (clastic/solid) of the bench where the stone is to be cut. There are occupational safety warning signs in the quarry and plant. No foreigner/migrant worker has been employed by the enterprise. Workers' access to clean water is guaranteed by the employer.



### 3.11 PROVINCE: DENİZLİ ENTERPRISE: K

With marble cutting plants and quarries both in Denizli and Afyonkarahisar, this firm is

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engaged in import and export activities.

Working conditions are well above the average. In high season, quarries are operated with teams of 20-25 persons in working in shifts. The company implements day shifts and does not require night shifts. It also guarantees employees' occupational safety.



Employment opportunities are provided to local communities and the company does not employ foreign/migrant workers. Workers' average age varies from 20 to 45. Accommodation is in containers, and workers have access to clean water. Accommodation and meals provided to workers demonstrate the value enterprise places on people. This is done by trying to provide more than the daily calorific intake to workers in charge of heavy jobs. Wages are set above the minimum wage and paid on time. There is no child labour.



*Beige Marble example from quarry/enterprise K*

### **3.12 PROVINCE: AFYONKARAHİSAR ENTERPRISE: L**

This quarry, where a marble named Afyon White is extracted, is one of the three biggest quarries in the region. Employing teams of 20 -30 people for project-based production, the quarry is in ideal position for import and export operations.



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Working conditions are good in terms of occupational safety. Accommodation is provided in brick-and-mortar buildings. Wages are paid on time, while they are above the average. Personal protective equipment has been provided to workers, and necessary occupational health and safety signs have been placed. There is no foreign/migrant worker or child labour among employees.

Energy transmission lines have been installed in a

manner to prevent fires.

### 3.13 PROVINCE: AFYONKARAHİSAR DISTRICT: İSCEHİSAR ENTERPRISE: M

Having incepted operations in early 1980s, this quarry extracts different stones such as Afyon white, tiger skin, Afyon grey, Travertine and purple/lilac, as multiple ore veins lie within the territories of the license. It is the second biggest quarry operating in the district of İscehisar. It was found out to be exporting to India and Italy.

Production standards show that bench width and height are ideal for rehabilitation at the quarry. Additionally, in places where the stone named Tiger Skin is extracted, bench height is 12 meters, which is a sign of inaccurate operations. The current supervisor of the site isolated this dangerous spot, and currently conducts work to eliminate all factors that constitute a danger. However, it should be noted that the occupational health and safety signs are only located at the entrance as seen in the photo but are not put up in the working site where necessary.



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The company has set wages at a level much higher than average wage in the industry. Average age of workers varies from 20 to 55. To prevent vehicles and workers from slipping/rolling over, blocks have been placed in the production routes at the quarry. In addition, width and height of production benches are safe, while energy transmission lines are placed in a manner to avoid contact with workers and any risk of fires. Workers' access to clean water is guaranteed, buildings offer electricity and hot water. In terms of operations, social improvements have been undertaken. They include wages above minimum wage, adjustment of weekly off days according to local events, and giving off days to workers for official and religious holidays.

Positive evolution of quarry operations is thanks to the presence of numerous quarries in the region and the resulting competitive and professional mindset. High number of quarries means the local community has more employment opportunities. These factors encourage employers to improve working conditions so as to retain their existing staff.

### 3.14 PROVINCE: AFYONKARAHİSAR ENTERPRISE: N

This is a well-established firm that provided stones to the construction of Anıtkabir, the tomb of our great leader Mustafa Kemal Atatürk. Holding a considerable share among marble enterprises in Turkey, this firm has started the construction of the most luxurious site in the Marmara Island of Balıkesir with a capacity of 700 persons.

The pride they take in it is well-deserved, which also reflects on the working conditions and the value they place on nature. There is a marble



cutting plant near the marble quarry they operate in Afyonkarahisar. It is adjacent to the quarries of Batı Oğuz Marble.

Paying above-average wage to workers, the firm pays its workers on time. There is no informal work, foreign/migrant worker employment or child labour at

the enterprise. There are over 100 people working at the plant, and teams of 50 persons are employed at the quarry.

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### 3.15 PROVINCE: BİLECİK DISTRICT: SÖĞÜT ENTERPRISE: O

Two kilometers from Söğüt's center in Bilecik, this quarry has been operated for three generations and has a high production capacity. The structure of the quarry shows that there has been long-term production. There is approximately three kilometers between the quarry and marble cutting plant. Bench/step width and height are ideal for rehabilitation. Reserves are ample and this allows the quarry to operate for long years.

Local communities are employed at the quarry and plant, and women workers are also among employees. Shift work is implemented in high season. Unlike Afyonkarahisar, this is located in a region where quarries are not high in number, and thus employment opportunities for the local community are limited. This results in working conditions remaining at minimum levels compared to Afyonkarahisar.

Wages range from minimum wage to average sector wage. Brick-and-mortar buildings are allocated for workers' accommodation. Access to clean water is possible, and there is hot water and electricity in the quarry.



There is no child labour at the quarry and plant. Foreign workers are employed for whom work permits have been obtained. On the other hand, as seen in the photograph, personal protective equipment was not provided to workers and they put on their own dresses and shoes, although occupational safety signs are available.

## **4. PHASE 1: CONCLUSION**

Quarry visits as part of risk analyses were made in autumn and winter, which is a period where the production is either low or completely stalled. Therefore, the number of workers observed was one fourth of the numbers generally seen at times of full capacity production. Even during the visits made in low season, many shortcomings were observed regarding production and employment. For a more comprehensive risk analysis, quarries should be inspected when there is full capacity production.

The mining industry is the primary source of unearned income in Turkey, providing a hotbed for everyone who have political influence to act the way they wish, involving politics and serving the interests of capital. However, natural destruction caused by mining, the struggle of villagers who stand against mine operations in their village, as well as deadly occupational accidents are heatedly debated agenda items in Turkey. Unfortunately, the media refrains from covering these matters comprehensively.

Public bodies failing to perform their duty and take a step towards protecting environmental and human rights, civil society organizations work hand in hand with local communities to solve this problem. Environmental Impact Assessment (EIA) reports and opinion of other institutions (Museums, State Water Works, Natural Protection and National Parks etc.) are all issued under political influence and tailored in a manner to serve the benefits of capital. For abandoned quarries, rehabilitation and reforestation work is not done homogeneously and at equal terms. Legal regulations are insufficient to address this issue. There are many Forest Sub-District Directorates and rangers, who, after identifying informal/unlicensed mining operations, faced suspension or expulsion. Not wanting to see their villages' water and air being polluted, villagers also face pressures to remain silent.

Violations of workers' rights are not effectively monitored and reported. Unionization is not widespread and it is clear that employers prevent organizing as they stand against unions.

The researcher's conclusion in the light of aforementioned is that a grassroots movement is what will truly push public authorities to do their job. People will work hand in hand with civil society organizations and unions and continue their fight to protect their environment, the right to life, and other fundamental human rights. This struggle, which is now taking place and will continue at legal and actual fronts, should be supported with international solidarity. Resolving the problems in production and employment at workplaces is possible only through organizing and that is the reason organizing efforts in this sector should be encouraged with solidarity and collaboration.



*Scene of marble quarries and Burdur lake*

# THE EVALUATION OF HUMAN RIGHTS RISKS IN NATURAL STONE EXTRACTION AND PRODUCTION ACTIVITIES IN TÜRKİYE

## PHASE 2

29 September 2023

### 1. INTRODUCTION and OVERVIEW

In 2022, the first part of the risk analysis evaluation study was carried out to analyse the working and production conditions of quarries in Turkey in terms of human rights. The second part of the study was carried out in the summer of 2023 with the aim of better observing the working conditions during the high production season. This summary report aims to describe the main outcomes of the field studies in 2023.

The natural stone sector is one of the mining activities with open pit mining and is one of the work sites where seasonal work is carried out. Natural stone and marble are among the sectors directly affected by the negative effects of rain and snowfall. Therefore, quarries located at high altitudes only allow production in spring and summer months due to the inability to ensure working safety in the winter season with heavy snowfall and the possibility of deterioration of the ore with precipitation.

In the field research carried out in 2022, worker interviews could not be carried out to the desired extent since the period during which the site visits were carried out coincided with the slow season of natural stone mining, where seasonal production is not carried out. For this reason, it had been decided to carry out a second phase of field studies in July and August 2023 when the natural stone sector was active in production.

If we take a brief look at the general situation in Turkey in 2023, it can be said that the already ongoing poor economic conditions in the country have worsened with the two major earthquakes that occurred on 6 February and caused the disappearance of 11 cities. While the country was mourning the loss of hundreds of thousands of people, the poor economic situation was reinforced by the cessation of industrial production in the earthquake zone and the diversion of national resources to improve the conditions in the region. While this situation has led to the deterioration of working conditions in all sectors, quarry licence holders, who have suffered financial and time losses, are taking initiatives that cause a regression in working conditions in order to compensate for their losses. These initiatives have placed a burden on the working class, which is seen as the lowest layer of the production system. The losses incurred due to unpaid salaries, stones that could not be sold and pits that could not be operated due to the lack of competent labour were billed to the mine labourers. The presidential and parliamentary elections held on 14 May, following the earthquake, led to a stressful election atmosphere in the country for months. The results of the elections did not alleviate the stressful atmosphere in the country and the bad trend in the economy; on the contrary, it continued to increase many times more.

### 2. FIELD RESEARCH

The main objective of the field research carried out in 2023 was to visit new workplaces in addition to the quarry visits carried out in 2022, and to conduct surveys with workers and observe working conditions during these visits during the high production season.

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Turkey experienced unseasonably heavy rain and hail in May and mid-June 2023, resulting in floods, overflows and landslides in many places. In addition, the high temperatures that started in mid-June continued until September. Since almost all the quarries extracting natural stone are located in state-owned forests, the General Directorate of Forestry issued announcements to prevent forest fires and banned access to forested areas. High temperatures and these bans caused slight delays in the planning of fieldwork.

In addition, during visits to the quarries listed below, the researcher was met with a clear negative attitude and was prevented from meeting with the workers. The researcher informed the quarry officials about the project and stated that she was visiting on TruStone's authorisation. Despite this, she was subjected to the authorities' sarcastic behaviour and was clearly not allowed to meet with the workers and visit the quarries.

**List of Quarries Where Field Work was Conducted**

<b>Location</b>	<b>Name of Quarry/Enterprise</b>	<b>Average Number of Worker</b>	<b>Person(s) interviewed</b>	<b>Data collection methods used</b>
<b>Karamanlı, Burdur</b>	<b>A</b>	No information available	Quarry manager	Face to face interview
<b>Karamanlı, Burdur</b>	<b>B</b>	No information available	Quarry manager	Face to face interview
<b>Karamanlı, Burdur</b>	<b>C</b>	More than 200	Quarry manager	Face to face interview
<b>Sütçüler, Isparta</b>	<b>D</b>	No information available	Quarry manager	Face to face interview
<b>Çandır, Isparta</b>	<b>E</b>	No information available	Gateman	Face to face interview
<b>İşçehisar, Afyonkarahisar</b>	<b>F</b>	More than 300	Owner	Face to face interview Survey with workers
<b>Altıntaş, Kütahya</b>	<b>G</b>	No information available	Gateman	Face to face interview
<b>Yatağan, Muğla</b>	<b>H</b>	No information available		Face to face interview
<b>Honaz, Denizli</b>	<b>I</b>	250-300	Company officials	Face to face interview
<b>Söğüt, Bilecik</b>	<b>J</b>	No information available	Factory Manager	Face to face interview

## **2.1 PROVINCE: BURDUR DISTRICT: KARAMANLI ENTERPRISE: A**

During the visit to the quarry, the site manager was interviewed under the supervision of a security guard. The supervisor allowed me to visit the quarry but stated that the on-site survey would not be appropriate for security reasons, as there were no personal safety measures to be taken. When I said that I wanted to conduct a survey with the workers, I was politely refused, stating that the company management would not authorise any survey work.

## **2.2 PROVINCE: BURDUR DISTRICT: KARAMANLI ENTERPRISE: B**

This marble construction site is located at the entrance of the quarry. In the first interview with the quarry manager, it was pointed out that the company closed its quarries in Muğla due to the lack of competent personnel in the sector and the increasing production costs due to the downturn in the country's economy and the consecutive increases in the minimum wage. It was added that only quarries in Beyşehir and Burdur are operated with limited capacity. It was also stated that due to the tough economic conditions and the contraction in production, workers' payrolls changed every day and there were no active workers in the quarry for more than 1 month. I was told that due to the inconsistencies in the amount of salaries, construction equipment operators are constantly changing and for this reason, the results of the survey will not show the truth and I was not allowed to interview the workers with a polite attitude.

## **2.3 PROVINCE: BURDUR DISTRICT: KARAMANLI ENTERPRISE: C**

Since its establishment, the company has achieved a steady growth rate with employment of more than 200 people. There are two entrances to the quarry in Burdur. The entrances from the machinery park are allocated only for heavy equipment and heavy load vehicles to ensure safety. The other entrance gate connects to the road leading to the quarry and leads to the construction site building.

The quarry manager was interviewed about the fieldwork and was informed about the details of our project and the survey to be conducted with the workers. Thereupon, the quarry manager did not allow any survey and prevented me from meeting with the workers.

During the visit to the quarry, it was also noticed that Chinese marble experts also visited the quarry to get information about the stones produced by the company.

## **2.4 PROVINCE: ISPARTA DISTRICT: SUTCULER ENTERPRISE: D**

The company has active quarries in Burdur and Isparta provinces. A visit was made to the quarry in Sutculer, which has a request for a new permit area. Worker interviews could not be conducted in the quarry due to work intensity. It was noted that the company management was not favourable to the survey.

## **2.5 PROVINCE: ISPARTA DISTRICT: CANDIR ENTERPRISE: E**

In the quarry where active production was observed, it was not possible to make an interview with any official due to the intensity of production. The only point to note is that the workers at the quarry were from the local community.

## **2.6. PROVINCE: AFYONKARAHİSAR DISTRICT: ISCEHISAR ENTERPRISE: F**

During the visit to the quarry, the owner of the quarry, was interviewed one-to-one. The owner, who is also the President of the Aegean Mineral Exporters' Association (EMIB), allowed us to

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carry out the survey to be conducted within the scope of the project on the condition that the questionnaires would be delivered to the workers by the company. With this, 20 workers replied survey questions under the monitoring of the employer and thus could not point out any mistreatments and violations. However, they still marked the fact that they are not happy with the food service and salaries. They indicated that they are not union members and have never been approached by a union to be organised.

It was observed that more than 300 employees are employed in the quarry and occupational health and safety measures are complied with in the quarry site and that the workers working in the construction site and quarry work with personal protective equipment.

### **2.7 PROVINCE: KUTAHYA DISTRICT: ALTINTAS ENTERPRISE: G**

The company, which also has quarries in Afyonkarahisar (which had visited in the phase 1) and Marmara Island, has a considerable place in the Turkish marble market. Kutahya quarry was visited on-site, but since the quarry was temporarily closed, the interview was conducted at the factory in Afyonkarahisar. It was stated that as a company policy, no survey study was allowed.

### **2.8 PROVINCE: MUĞLA DISTRICT: YATAGAN ENTERPRISE: H**

The company has active quarries in Mugla, Denizli, Burdur (which had visited in the phase 1) and Isparta provinces. During the interview with the manager of the quarries, no support could be obtained for field analyses and surveys.

However, it is known that the workers in Burdur quarries complain about the late payment of salaries, non-payment of working hours, poor quality of food and irregular supply of clean water. Workers have used methods such as work slowdowns and collective resignations many times to express their dissatisfaction; however, they have not been able to achieve any improvement in working conditions. In addition, a number of labour lawsuits against the owner of the company are still pending before the labour courts.

### **2.9 PROVINCE: DENİZLİ DISTRICT: HONAZ ENTERPRISE: I**

The company has many production quarries in Burdur, Isparta and Denizli provinces. This mining area had been visited in 2022 – Enterprise J - and working conditions had been observed above the average with an objective of putting workers' safety first.

This time during the interviews with the company officials, it was observed that foreign workers were employed in the company. The managers stated verbally that these workers are registered, and they are not employed illegally. I was not allowed to visit the quarry sites and conduct a survey.

### **2.10 PROVINCE: BİLECİK DISTRICT: SOĞUT ENTERPRISE: J**

This site was visited in the first phase, with a note of quality production facility with lack of provision of personal protection equipment to workers. During the factory visit, the factory manager was interviewed. The company has ISO authorisation certificates. Our request to carry out field inspections and surveys was rejected by the company with a cynical and rude attitude, and we were prevented from entering the quarry and interviewing the workers.

When the researcher stated that the results of this study visit and this behaviour would be reported to TruStone initiatives, the managers embraced a sarcastic manner and said that they could meet with TruStone officials in person at the marble fair in Italy and so that this reporting was not important for them.

### **3. CONCLUSIONS and RECOMMENDATIONS**

As a result of the risk analysis study carried out to determine the production and working conditions in natural stone mining in Turkey, technical information about the production sites could be collected during the period when there was no production in the mines; however, the targeted concrete data could not be obtained during the second stage site visits carried out to observe the working conditions of the workers. Workers could not be interviewed, and questionnaires could not be conducted due to the attitudes and obstacles of employers and managers.

Although obstacles were encountered during the field trips carried out in the two stages of the research, there are important conclusions to be drawn. The rude attitudes of the employers and the prevention of the study by white-collar managers suggest that the working conditions in the quarries where production is carried out are not good. In the sector where the seasonal working system is applied, the fact that mine workers are not organised and thus not union members and that there is no other organisation to which they can report the negative working conditions and grievances they are exposed to prepares a more suitable ground for the exploitation of mine workers. Due to the widespread rural-urban migration in Turkey and the gradual decline in the quality of education and vocational training schemes, the proportion of competent labour force with the necessary knowledge and skills is rapidly decreasing. When mines are unable to employ experienced, skilled and certified workers, children and illegal workers are instead employed to fill the labour shortage. In many mines, it is well known that children between the ages of 15-17 are employed as greaser and/or assistant of heavy equipment operators. The recent studies also indicates that the labour shortage in the mining sector will increase in the coming years and become a more serious problem in terms of employment of children and migrant workers.

It is a common practice that workers employed in the quarries are mostly composed of people living in the surrounding villages and districts. During the research, it was not deemed appropriate to visit the settlements where the workers live and conduct a survey with them outside the supervision of the employer, as it was foreseen that conditions that could threaten the safety of the researcher. In many quarries, the researcher was questioned by the workers as someone sent by the employer to test them. In such small settlements, where employment opportunities are limited under overwhelmingly difficult economic conditions, workers who find work in the mines avoid giving information about their working conditions for fear of losing their jobs.

***Written by an independent researcher, Forest Engineer, with the cooperation of Building and Wood Workers' International (BWI) on 29 September 2023.***

***Assignment commissioned by the civil society organisations involved in the TruStone Initiative.***

***The list with the names of enterprises mentioned in this report is available for TruStone members.***