

# **Coal miners' deaths in Darra Adam Khel, Kohat**

*An HRCP fact-finding report*



Human Rights Commission of Pakistan



# Coal miners' deaths in Darra Adam Khel, Kohat

An HRCP fact-finding report (March 2024)

---

## Introduction

On 20 October 2023, three coal mine workers in Darra Adam Khel, Kohat, died from exposure to toxic gases in a coal mine. Accidents at this coal mine have reportedly occurred with alarming frequency: for instance, two workers lost their lives earlier in August when explosives were set off in the mine.

The Human Rights Commission of Pakistan (HRCP) deemed it necessary to investigate this incident. For this purpose, a fact-finding mission comprising Akbar Khan (vice-chair HRCP Khyber Pakhtunkhwa), Ijaz Mohmand (HRCP member) and Shahid Mehmood (regional coordinator for HRCP's Peshawar office) was conducted on 19 December 2023. The mission was tasked with (a) visiting the mine where the accident had occurred and also a mine considered a model mine with no history of accidents; (b) observing safety protocols and emergency measures put in place for mining and explosions; (c) determining the causes behind the high number of worker fatalities in the area's coal mines; and (d) assessing the quality of standards in place for other labour rights, such as prevalence of child labour, wages paid, and compensation given in case of deaths of workers.

## Meeting with the local facilitator Faiz Alam

### *About Tehsil Darra Adam Khel*

The mission first met with a local facilitator at Darra Adam Khel, Faiz Alam, a human rights defender and a businessman who works in the coal mining industry. Mr Alam informed the mission that Darra Adam Khel is a tribal area that was merged into the province of Khyber Pakhtunkhwa in 2018, where it was categorized as a subdivision of the Kohat district. According to him, coal deposits were found in this area's mountains—colloquially known as the mountains of Surma—in 2005. However, coal extraction became increasingly difficult in 2006 and onwards: coal mine owners relocated to other areas, and the Taliban seized control of the coal reserves.

Once the security situation started to improve in 2013, new coal deposits were found. Currently, Darra Adam Khel is home to almost 500 major and minor coal mines. Though there are no official statistics, the coal mining industry in this area employs around 15,000 labourers, the majority of which come from the Shangla district.

### *How is the coal mining industry run?*

Mr Alam explained that when a coal deposit is found, the government consults the residents of the area in accordance with government policy, the Khyber Pakhtunkhwa Mines Safety, Inspection and Regulation Act 2019. In these discussions, the tribal people recommend one or two local 'owners' (or *malakan* in the local tongue). The leases to the mines are then issued to these owners who conduct business directly with the government while distributing the revenue among the families of the tribes.

The owners further sub-contracts the extraction of coal to a contractor who sets up the mine's management, mate (a middleman who recruits labourers from villages) and labour force. The manager, who works closely with the owner and contractor, calculates the revenue from the mine. The manager, who is in close contact with the owner and contractor, estimates the revenue from the coal mine. The mate's responsibilities encompass overseeing safety procedures in mining, detonating explosives, and organizing housing and food for the workforce.

The mission was informed that mines in Darra Adam Khel employ between 5 and 150 individuals, and that various types of coal are extracted. Coal prices range from PKR 20,000 to PKR 50,000 per ton, depending on the grade of the coal, according to which additional taxes are also paid—approximately PKR 200-400 per ton. The workers are paid per ton of coal sold, receiving monthly wages of PKR 50,000-80,000. Furthermore, if a worker dies from a mining accident, the contractor pays the surviving family members



PKR 300,000-500,000. The surviving family members receive an additional amount up to PKR 300,000 from social security. Some mine owners cover these expenses if the government refuses to pay.

It should be noted that the Darra Adam Khel coal mines are assigned numbers, and that the mine where three workers lost their lives in October was Mine No. 45. However, the mission decided to first visit a mine that reportedly did not have a history of mining accidents—Mine No. 1.

### Visit to Mine No. 1

The mission noted that the conditions in this high-altitude mountain coal mine were extremely challenging. There was no use of modern mining technology; instead, conventional extraction techniques were used, and the workers only wore regular plastic shoes and *shalwar kameez* instead of proper safety gear. A rail track had been installed inside the mine for extraction and to serve as an emergency exit. A steel rope was used to support a trolley that was positioned above the track.



*Tunnel in Mine No. 1*

The mission spoke to the workers at the mine. They stated that they had a number of pressing problems that required immediate attention, such as a lack of personal protective equipment and helmets. A number of mishaps also take place that put their lives in danger. One worker, Ali Gul Khan, added that the working conditions were quite subpar. The cost of their meals was covered by the workers themselves, for instance. When asked about mine inspections, the workers said that the mine had yet to be visited by a government official, and neither had a representative from the mining department visited the site to inspect the safety measures in place; instead, government officials only interacted with the mine owners, contractors and managers.

Moreover, the workers said that they had contracted a variety of diseases over time as a result of breathing in coal dust, such as respiratory illnesses and skin conditions. If an accident occurs in the mine, there is no health facility available nearby. The doctors instead transfer critical patients to Peshawar. The workers underscored the need for a fully-equipped hospital and worker residential colony to be built, stating that the government ought to ensure that every mine has a medical facility nearby. When asked about their knowledge of policies governing mine safety, the workers replied that they had none. Concerning any use of child labour, the workers said that despite its illegality, some poverty-stricken families would exaggerate their children's ages to enable them to work and earn income for their households.

Mr Alam informed the mission that mine records are required to be kept in the manager's office at each mine. However, at Mine No. 1, the manager's office was found to be closed, and when the mission inquired about recordkeeping, they were told that the manager does not visit on a daily basis and the records are hence retained by the management. The mate and manager enter the mine at the beginning of every shift to assess safety protocols, including underground temperatures, gas density, the presence of water, and daily mine measurements, in accordance with the forms that the government provides. These records are then kept in the manager's office while the workers and mate perform their usual tasks. However, the workers are tasked with placing explosive substances inside the mine themselves, contradictory to the law



that stipulates hiring an expert for this task. When questioned about mining training, the mine's mate, Mr Abdul Hameed, told the mission that he had been trained in mining, but that it was merely paperwork.

### **Visit to the local civil hospital**

Following their visit to Mine No. 1, the mission went to Darra Adam Khel's civil hospital where they had a meeting with Dr Waqar Khan and Dr Naseem Ullah.



*Meeting with doctors at the civil hospital*

The doctors informed the mission that the hospital receives three to five workers every day in a local vehicle for treatment. Most of the patients become affected by congestion inside the coal mine. Those among them who become critically ill are referred to Peshawar. However, since the coal mines are located at a distance from the hospital, the patients' conditions frequently worsen before they arrive at the hospital. This hospital also lacks essential amenities, such as life-saving medications, and a surgical facility—in fact, the position of the surgeon remained vacant for years.

According to the doctors, the two main hazards miners encounter are coal dust and carbon monoxide exposure. Workers may sustain injuries from falling stones or explosive materials. The doctors recollected incidents when miners were injured and even burned from mine collapses and explosive blasts, but they were only able to apply plaster with their limited resources. Three months had passed since the hospital's electricity bills were not paid, leaving the staff without any access to electricity. Mine owners and other wealthy individuals make financial contributions to the hospital, such as providing X-ray machine, generators—covering maintenance costs for these equipment—and even a recent donation of an ultrasound machine. However, such contributions are not sustainable solutions.

The hospital has been operating since 1950. Prior to the province's merger, the federal government had been allocating PKR 8 million–8.5 million solely for the procurement of medicines, with an additional fund for maintenance. However, after the merger, between PKR 1 million and 1.2 million are received annually for medications, with no funds for maintenance. The daily influx of patients at the hospital's out-patient department (OPD) can reach up to 120. The hospital has 10-12 doctors who share duties, and four to five doctors are on duty at a time.

### **Visit to Mine No. 45**

When the mission arrived at Mine No. 45, where three mine workers died from exposure to toxic gases, they could not find the mine manager or other pertinent staff at the site. The workers at the nearby coal mine, which was operational, claimed that the mine had been closed by the government since the accident.



*Coal mine workers interviewed near Mine No. 45*

According to these workers, Mine No. 45, which had been registered with the government, was owned by Mr Fazal Subhan and managed by Mr Nisar Khan. There had been no safety measures in place for fresh air inside the mine. The workers further revealed that, before the incident, an inspector from the provincial government's Mineral Development Department had visited and declared the mine dangerous, ordering the closure of the mine on the spot and issuing a certificate stating that the mine was not suitable for mining. However, mining work had continued illegally. The workers were hesitant to speak on the topic further, presumably out of concern for losing their jobs.

The mission discovered that the mine's office was closed and that there were no warning letters from the mine inspector pertaining to the incident. The team found a lack of understanding and knowledge of policies when they asked the workers whether an FIR had been registered regarding the incident. No instructions or guidelines regarding mining were found at the site either.

### **Meeting with the Darra Adam Khel Coal Mine Labour Union**

The mission then visited the local coal mine workers' union at their office, situated in the main Adam Khel Bazaar. Mr Sarfaraz Khan, the union's president, was a resident of the Shangla district. According to Mr Khan, the government fails to provide any assistance to ensure their well-being or protect their rights, in the absence of which, the union helps the workers themselves. Although the union interacts with the government on a regular basis, Mr Khan said, the government does not act in line with the policies it has developed. There is no practical implementation of the policies; the union alleged that a nexus exists between the coal owners and the government. For example, in the case of a worker's death during mining, the government is obligated to provide the worker's family with PKR 300,000; however, this obligation is frequently neglected by the government.

Inadequate medical facilities can be seen in coal mines as well as in hospitals. While the mine inspector is responsible for issuing a certificate of competence upon site visit, these inspectors do not carry out this duty. They instead communicate with the owner and manager informally. According to Mr Khan, 450 coal mines are currently operational in Darra Adam Khel, while 40-50 mines have been closed due to disagreements and insufficient funds for investments. He also said that it is the mine manager's duty to supply a complete mining kit to the workers, as well as masks which protect miners from coal dust and cost up to PKR 15,000 per unit. However, they fail to do so. Most miners also continue to extract coal using traditional methods, with only a few using contemporary machinery. Government-sponsored training for contemporary mining techniques does not take place either, despite assertions to the contrary. Whenever there is an accident, workers are considered entirely responsible.





*Meeting with the coal mine labour union's president*

### **Meeting with the provincial Minerals Development Department Chief Inspector**

Finally, the mission met with the Khyber Pakhtunkhwa Minerals Development Department Chief Inspector, Fazal Raziq, at his office on 28 December 2023.

According to Mr Raziq, there are fifteen inspectors posted to monitor the mines in Darra Adam Khel. These inspectors frequently visit coal mines and submit their monitoring reports to his office. Furthermore, a week prior to the tragedy at Mine No. 45, an inspector visited the mine and closed it at that time. However, Mr Raziq claimed that they later learned that the coal extraction had not stopped, and that the workers had fled before they could be found.

When the mission requested access to the accident report and certificate of competency, Mr Raziq informed them that the clerk responsible for maintaining the record was presently on leave and that it would be shared later on (it must be noted that the report has not been shared yet despite repeated requests). According to the chief inspector, the department has also initiated disciplinary action against the mine manager and owner, and that this mine is no longer operational.

Mr Raziq said that over 80 percent of the mines in Darra Adam Khel were open prior to the merger with Khyber Pakhtunkhwa, implying that the government did not have authority over them at that time. He claimed that mining accidents had frequently taken place back then, but they have dropped significantly since the merger. When the mission questioned him regarding illegal mines, he stated that there are 436 coal mines currently in Darra Adam Khel, each of which are registered with his department. However, no mine records have been shared with them.

He claimed that over 12,000 workers have received training in safe mining practices thus far, but that these workers do not take the training seriously. The owner provides helmets, but workers do not utilize them. Accidents also involve the carelessness of mine workers, he said, and no other industry grants privileges that coal mine workers enjoy, such as financial support from coal mine owners. When the mission shared the issues raised by the mine workers interviewed, he did not respond.

Mr Raziq asserted that safety at coal mines can never be completely guaranteed. Moreover, the department lacks expertise from geologists and other technical coal mining professionals, and they have limited resources for research. Regarding illegal practices, the chief inspector said that every mine owner and manager is strongly advised not to give a worker the day's wages if they violate the law.

### **Conclusion and recommendations**

The fact-finding mission observed a significant amount of neglect on the part of mine owners and the provincial government regarding occupational safety in coal mines. The rules and protocols stipulated in the Khyber Pakhtunkhwa Mines Safety, Inspection and Regulation Act 2019 were not adequately applied



at the mines visited, nor did the minerals development department have sufficient information about the law's implementation.

The workers observed were not wearing the safety gear and helmets necessary to protect them from hazardous working conditions. Moreover, there were no written instructions about safety precautions anywhere outside the mines. A discernible lack of coordination among the health department, the minerals development department and the coal mines labour union exists, and an alarming lack of recordkeeping by both the government and the coal mines' management. Finally, the mission was concerned to note that the coal mine workers also showed signs of negligence for their own safety, lacking technical mining knowledge and awareness of laws protecting their rights. The state of their clothing and meals provision were appalling as well.

Based on the mission's visits and meetings, it would like to make the following recommendations:

- Reform the law governing mine safety practices to make it compatible with realities on the ground, particularly the structure of mine management: work is done by the owner's agents and contractors rather than the mine's owner and labourers. The law must also include the type and conditions of machinery to be used, and delineate safety protocols. If the minimum mining standards are not met, the mine should be shut down permanently and declared illegal.
- Record and document all mining practices, and ensure that protocols are recorded and documented. As soon as an abnormal variation is discovered, an early warning system with safety protocols must be initiated. Mines must also use cameras to capture footage of any abnormalities and mishaps for later examination.
- Instruct mine management, owners, agents, and workers in safety procedures, recordkeeping and report-writing. Non-compliance must also be severely punished. Collaboration with the coal miners' labour unions may be sought here to enlist their help in training workers.
- Create guidelines and standards for the use of explosives inside mines and ensure they are followed. Only trained individuals should perform such dangerous and technical tasks.
- Ensure that coal mine workers are formally registered with contracts stipulating decent pay and working conditions to improve their wellbeing and job security. No worker who is not registered should be allowed to work in coal mines.
- Ensure that compensations paid to workers and/or their families, in cases of death or injury, must be made in a timely manner.
- Expand the civil hospital's capacity to provide adequate medical treatment to mine workers, especially those who become critically ill.

Disclaimer: This document has been produced with the financial assistance of the European Union. The contents of this document are the sole responsibility of the Human Rights Commission of Pakistan and can under no circumstances be regarded as reflecting the position of the European Union.



Funded by the  
European Union