

# 121-01 28.04.2010

## **Morgan Stanley Board of Directors**

John J. Mack 1585 Broadway New York, NY 10036, USA

## **UBS Board of Directors**

Bahnhofstr. 45, P.O. Box, CH-8098 Zurich, Switzerland

Renaissance Capital Board of Directors Moscow City 10 Presnenskaya nab., block C 123317 Moscow, Russia

## Dear Sirs,

We, the International Social-Ecological Union (SEU) and undersigned, would like to address you as the leaders of the banks coordinating the Initial Public Offering of shares on the London Stock Exchange for OJSC URALCHEM.

Your professional experience and authority leave no doubt that you appreciate the social responsibility large industrial companies, including Uralchem, have for environmental conservation, sustainable resource use, protection of human health and basic human rights. However, in supporting Uralchem's IPO, you share a responsibility for its standards of work and their present and future consequences.

We have been monitoring the social and ecological impacts of Uralchem's production for several years now. In town of Kirovo-Chepetsk (Kirov oblast'), home to Uralchem's B.P.Konstantinov chemical plant, we have been carrying out a monitoring programme in partnership with Waterkeeper Alliance, an international coalition led by Robert Kennedy, Jr. An "environmental surgery" has been open since 2009 in Berezniki (Perm krai), home to Azot factory. Uralchem's fertilizer plant in Voskresensk (Moscow oblast') has also been under our experts' close attention. SEU works in partnership with Russia's state environmental agencies. In all, SEU has sufficient data for an independent evaluation of the social and ecological consequences of JSC Uralchem's practice.

The company's operations teem with violations of Russia's environmental protection law. Data concerning fires and incidents, including some which had lead to human death and the release of life-threatening substances into the environment, have been withheld not only from public scrutiny but even from state monitoring agencies (Appendix 2). Consequences of such incidents have been dealt with in secret, using primitive, environmentally unacceptable methods. Data on regular emissions of factories have

also been withheld, while Uralchem's plants are in several locations among the largest polluters of fresh waterways.

The plants' equipment is depleted and very accident-prone. Technologies and machinery used in the production of new substances do not pass legally binding environmental tests. Working rights and health and safety regulations are systematically violated. Trade union activity has been firmly repressed. The company's management demonstrates a total lack of transparency, ignoring or actively resisting initiatives for public scrutiny.

The company's irresponsible behaviour inevitably stains its international reputation. Uralchem's plans to build a plant in Dieppe, France, have caused a wave of protest among the local population.

In conclusion, JSC Uralchem does not meet the modern standards and requirements as a member of the international business community. The company's long-standing irresponsible behaviour towards the Russian society, state, and its own minority shareholders, casts serious doubt over its ability to act responsibly towards its future international investors.

We insist that Uralchem's IPO can only be carried out when the company's plants have been thoroughly modernised and measures are in place to resolve its social and environmental problems.

We hope our information will inform your position concerning Uralchem's IPO plans, so that the Russian Directors of the company will be held accountable for preventing future environmental damage and human rights abuse in the work of the company.

Sincerely,

**SEU Council Co-Chairman** 

V. A. Brinikh

Also signed:

**BankTrack** (Netherlands)

PLATFORM-London (UK)

Les Verts, Europe Ecologie (France)

The Berne Declaration (Switzerland)

**Corporate Europe Observatory (Belgium)** 

**Institute for Globalisation and Social Movements (IGSM – Russia)** 

Vyatka-Riverkeeper (Russia), Waterkeeper Alliance member (USA)

Public Fond GRAZHDANIN (Russia)

**International Accountability Project (USA)** 

**CounterCurrent (Germany)** 

Lucha Indígena (Perú)