



PHOSAGRO

**Public Joint Stock Company
«PhosAgro»
(PJSC «PhosAgro»)**

Leninsky prospect, 55/1, bld. 1,
Moscow, Russia, 119333
Tel.: + 7 (495) 232 96 89
Fax: + 7 (495) 956 19 02
E-mail: info@phosagro.ru
www.phosagro.ru
OKPO 57951659
OGRN 1027700190572
INN/KPP 7736216869/773601001

13.06.2019 No PA-0219

to No _____ date _____

Adam C.T. Matthews
Co-Lead
Investor Mining & Tailings Safety
Initiative
Director of Ethics & Engagement
Church of England Pensions Board

John Howchin
Co-Lead
Investor Mining & Tailings Safety
Initiative
Secretary General
Swedish Council on Ethics
for the AP Public Pension Funds

Dear Sirs!

Thank you for your inquiry and concern for tailings safety. Kirovsk Branch of Joint Stock Company Apatit, a PhosAgro Group company, owns and manages tailing storage facilities of apatite-nepheline beneficiation plants ANBP-2 and ANBP-3. The relevant information is attached hereto. PhosAgro adheres to safe operation and ensures regulatory compliance.

National safety regulations require that each dam should have a certificate titled a "Safety Declaration". Such declarations approved by the Federal Environmental, Industrial and Nuclear Supervision Service of Russia in 2018 provide that the safety level of hydraulic structures located at ANBP-2 and ANBP-3 tailings facilities is regular (highest) which implies that the hydraulic structures conform to the design documents, relevant rules and regulations; safety indicators do not exceed the acceptable limits for structures and foundations; no rules or regulations are breached in the course of operation; the company complies with any and all instructions of state supervisory authorities.

PhosAgro abides by the regulations on such facilities operation. Therefore, the accidents at hydraulic structures you mentioned in the inquiry do not change the company's approach to tailings management and do not require additional steps to protect citizens and environment.

Best regards,

CEO, PJSC PhosAgro

Andrey A. Guryev

Sergey Samosyuk
Tel. +7 (495) 232-96-89 (2712)



PHWMM040145Q0SVRKUB

1. "Tailings Dam" Name/Identifier	2. Location	3. Ownership	4. Status	5. Date of initial operation	6. Is the Dam currently operated or closed as per currently approved design?	7. Raising method	8. Current Maximum Height	9. Current Tailings Storage Impoundment Volume	10. Planned Tailings Storage Impoundment Volume in 5 years time.	11. Most recent Independent Expert Review	12. Does the PhosAgro have full and complete relevant engineering records including design, construction, operation, maintenance and/or closure.	13. What is your hazard categorization of this facility, based on consequence of failure?	14. What guideline do you follow for the classification system?	15. Has this facility, at any point in its history, failed to be confirmed or certified as stable, or experienced notable stability concerns, as identified by an independent engineer (even if later certified as stable by the same or a different firm).	16. Does the PhosAgro have internal/in house engineering specialist oversight of this facility? Or do you have external engineering support for this purpose?	17. Has a formal analysis of the downstream impact on communities, ecosystems and critical infrastructure in the event of catastrophic failure been undertaken and to reflect final conditions? If so, when did this assessment take place?	18. Is there a) a closure plan in place for this dam, and b) does it include long term monitoring?	19. Have you, or do you plan to assess your tailings facilities against the impact of more regular extreme weather events as a result of climate change, e.g. over the next two years?	20. Any other relevant information and supporting documentation. Please state if you have omitted any other exposure to tailings facilities through any joint ventures you may have.
1. Tailings storage facility of apatite-nepheline beneficiation plant No. 2 (ANBP-2). ANBP-2 tailings storage facility has the following retaining structures: - Dam No. 1; - Dam No. 4; - Dam No. 8; - Dam No. 12; - Dam No. 12a; - Diversionary dam.	67°39'34"N 33°12'24"E	- Owner: JSC Apatit; - Operator – Kirovsk Branch of JSC Apatit.	Active	September 1963	Yes	Upstream, retaining structures are raised from tailings via hydraulic inwash. Primary dams are earthfill, secondary dams are upstream.	Dam No. 1 – 72.41 m	481.54 mln m ³ (tailings at 31.03.2019).	500.76 mln m ³ (as at 31.12.2023).	28.02.2018. (Expert Opinion on the Safety Declaration for Hydraulic Engineering Structures of ANBP-2 Tailings Storage Facility of JSC Apatit No. 103).	Yes	hazard class 1 Accident probability: - maximum credible accident 8.73x10-6 1/year. - most severe accident 3.46x10-8 1/year.	Decree of the Russian Government dd 02.11.2013 No. 986 "On Classification of Hydraulic Structures"	No	Kirovsk Branch of JSC Apatit has established a department for supervision and monitoring of hydraulic structures. It monitors compliance with the Russian legislation and regulatory requirements for hydraulic structures at the Kirovsk Branch of JSC Apatit, analyses the condition of hydraulic structures and makes action plans to ensure compliance with the regulatory requirements in the field of hydraulic structures safety. ANBP-2 and ANBP-3 tailings storage facilities have introduced a permanent state supervision regime stipulating systematic (as per schedule) and unobstructed supervision by the authorised officers of the supervisory authority, monitoring of the operator's compliance with mandatory requirements in the course of facility operation, technological processes and operations, including	Yes, in 2017	No; No	No	Safety declarations applicable to hydraulic structures approved by the Federal Service for the Supervision of Environment, Technology and Nuclear Management of the Russian Federation in 2018 provide that the safety level of hydraulic structures located at ANBP-2 and ANBP-3 tailings facilities is regular (highest) which implies that the hydraulic structures conform to the design documents, relevant rules and regulations; safety indicators do not exceed the acceptable limits for structures and foundations; no rules or regulations are breached in the course of operation; the company complies with any and all instructions of state supervisory authorities.
2. Tailings storage facility of apatite-nepheline beneficiation plant No. 3 (ANBP-3). ANBP-3 tailings storage facility has the following retaining structures: - Dam at Chernuchayna river; - Dam at Prozrachny brook; - Dam at Chernaya river.	67°32'17.0"N 33°35'40.0"E	- Owner: JSC Apatit; - Operator: Kirovsk Branch of JSC Apatit.	Active	25 April 1963	Yes	Upstream, retaining structures are raised from tailings via hydraulic inwash. Primary dams are earthfill, secondary dams are upstream.	Dam at Prozrachny brook – 56.4 m	252.19 mln m ³ (tailings at 31.03.2019).	328.39 mln m ³ (as at 31.12.2023).	28.02.2018 (Expert Opinion on the Safety Declaration for Hydraulic Engineering Structures of ANBP-3 Tailings Storage Facility of JSC Apatit No. 104).	Yes	hazard class 1 Accident probability: - maximum credible accident 8.73x10-6 1/year. - most severe accident 3.46x10-8 1/year.	Decree of the Russian Government dd 02.11.2013 No. 986 "On Classification of Hydraulic Structures"	No	maintenance, routine repair, diagnostics, testing and inspection of structures, technical devices, tools and equipment used at the high-risk facility, overhaul, mothballing and abandonment of the high-risk facility, as well as the implementation of hydraulic structure safety arrangements.	Yes, in 2017	No; No	No	