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Integrating Gender Equality into Work Safety and Relevant Standards in Georgia's Construction Materials Sector

Executive Summary of the Policy Brief

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Empowering Change

Executive Summary

Georgia's construction materials manufacturing sector — encompassing cement, concrete, aggregates, bricks and blocks, steel and rebar, glass, insulation, gypsum, ceramics, asphalt and others — is one of the most strategically important pillars of the country's industrial economy. With Georgia's December 2023 grant of European Union (EU) candidate status[1], the sector's regulatory trajectory is more closely tied to the EU acquis than at any time in its modern history. Yet the sector has, until now, been almost invisible in Georgia's gender equality discourse.

This policy brief approaches the integration of gender equality into occupational safety and related standards in Georgia's construction materials manufacturing sector not as a peripheral matter of social policy, but as one of the substantive dimensions of quality infrastructure (QI) reform, European integration and economic sustainability. The relevant data, findings and recommendations are summarised below.

Purpose and methodology. The brief asks whether Georgia's occupational safety and technical standards architecture protects women workers in the construction materials manufacturing sector, and what role the country's QI institutions could play in introducing gender-responsive safety standards. It combines a desk review of national legislation, technical regulations, conformity assessment procedures and institutional mandates with 17 key informant interviews (KIIs): the Georgian National Agency for Standards and Metrology (GEOSTM), the Unified National Body of Accreditation – Accreditation Center (GAC), eight producers spanning cement, ready-mixed and reinforced concrete, concrete products, tiles, bricks, paints and dry mixes and metal constructions, five testing laboratories, a laboratory sector expert and an independent accredited OSH specialist. Findings on enforcement and on social dialogue rest on published sources, and the brief should be read with that limitation in view.

Women in the sector: occupational segregation drives differentiated risks. Construction materials manufacturing accounts for roughly 10% of manufacturing employment, and women for roughly 10% of employment within it. They are concentrated in professional, sales, administrative, technical and support roles and are largely absent from production lines, kiln and furnace operation, quarrying and field work. Average nominal wages in the subsector sit below both the wider light manufacturing average and the national average, for women and men alike. Nationally, female labour force participation has hovered around 40–44% against 62–66% for men; women perform roughly five times more unpaid domestic and care work; the adjusted hourly pay gap declined from 15.9% in 2020 to 11.4% in 2024, while the unadjusted monthly gap had reached 33.4% by Q2 2025.

The legal framework is substantially adequate; its application in practice remains problematic. The 2019 Organic Law on Occupational Safety and the 2020 Labour Code reform already require employers to keep pregnant and breastfeeding workers out of hazardous work, to adapt duties on medical certification, to provide paid nursing breaks, to conduct comprehensive risk assessment, and to provide protective equipment designed to fit the user's anatomy, accounting for physiological differences between men and women. Product legislation — Decree No. 476/2018 on construction products and Technical Regulation No. 82/2020 on personal protective equipment (PPE) — contains no gender provisions, which is unsurprising, since it regulates the performance of goods rather than the conditions under which they are made. The binding constraint is enforcement. The Labour Inspection Service (LIS), which grew from 113 to 167 inspectors

[1] Although Georgia has EU candidate status, the negotiations are at a de facto standstill. The European Commission concluded in its 2025 progress review that it considers Georgia "a candidate country in name only".

between 2021 and 2022, conducted active enterprise inspections; its 2025 report records 2,045 inspections on occupational safety and 1,664 on labour rights. What those inspections found, however, cannot be read against gender at all: the Service publishes no sex-disaggregated data on identified violations, occupational injuries or enterprise workforce composition. At the same time, administrative fines remain capped at GEL 50,000, and ILO Convention No. 81 on labour inspection remains unratified.[2]

Two QI institutions have already taken steps on gender. GEOSTM signed the United Nations Economic Commission for Europe (UNECE) Declaration in February 2020, has developed an Action Plan for 2025–2027 in this area and has designated a gender focal point; GAC has developed a plan running through 2028 and appointed a gender coordinator. Both initiatives are voluntary. Neither ISO/IEC 17025 to which the quality management system of the Metrology Institute of Georgia complies with, nor ISO 9001 in case of GEOSTM's standardisation function, sets explicit gender requirements, although ISO 9001 refers indirectly to a non-discriminatory working environment. Likewise, neither ISO/IEC 17011 nor Regulation (EC) No 765/2008 establishes gender-related requirements for accreditation bodies. Precise information could not be gathered on the Market Surveillance Agency (MSA) and the LIS within the scope of this study, as they did not participate in it; however, the desk research findings suggest that the existence of relevant practice at these institutions is not confirmed. Nor was any experience of cooperation on topics relevant to this study identified among the four institutions named above.

International practice has moved from principle to procedure. The operative definition comes from ISO/IEC guidance: a gender-responsive standard is one that considers gender implications in its content, requirements and application so that women and men benefit equally. Around it sits a working toolkit — UNECE Recommendation U[3] on Gender-Responsive Standards (2018), whose annexed Declaration was opened for signature in May 2019 and had attracted 86 signatory organisations by December 2024; ISO 53800:2024; the joint Gender Action Plan of the European Committee for Standardization (CEN) and the European Committee for Electrotechnical Standardization (CENELEC), together with their new Advisory Committee on Diversity and Inclusion; and a dedicated inclusive working group on PPE within the CEN and CENELEC Joint Technical Committee on Horizontal Topics for PPE (CEN-CLC/JTC 23). In the European countries examined in this document, practice is reflected in specific procedures rather than remaining at the declaratory level. For Georgia, this means an opportunity to develop corresponding instruments that would establish a procedural (rather than legislative) framework.

Primary findings: the low representation of women means the risks cannot be tested in practice. The study found near-total occupational segregation between more office-based roles (predominantly women) and field roles (almost entirely men), and this conditions every finding that follows. No producer or laboratory interviewed conducts proactive reproductive-health risk assessment, notwithstanding Article 22 of the Labour Code and the crystalline silica and heavy metals present in cement and clinker dust; where the question arose at all it was handled as informal judgement, with companies stating that they would apply the legal minimum should a specific case occur. No documented PPE fit problem was reported, principally because women are practically absent from the roles in which one would surface; set against international evidence that 74% of tradeswomen are exposed to unnecessary hazards through poorly fitting equipment,

[2] Organic Law of Georgia on Occupational Safety (2018); Labour Code of Georgia, Organic Law No. 7177 (29 September 2020, effective 1 January 2021). Enforcement gaps in light manufacturing are noted in: European Commission, Georgia 2025 Enlargement Report (provisional).

[3] Recommendation U is one of UNECE's lettered policy recommendations issued by WP.6 — the Working Party on Regulatory Cooperation and Standardization Policies. The series runs A through U (T is "Standards and Regulations for Sustainable Development", S covers predictive risk management in market surveillance, and so on), and U is titled "Gender-Responsive Standards".

this means we are dealing not with disregard of the individual-fit duty but with its possible non-fulfilment, for the reason that the need in practice does not arise. It should be added that respondents themselves recognise that ill-fitting equipment is not only a breach of a legal requirement but can become a genuine threat to life. Larger producers, for the most part, provide separate sanitary and changing facilities, in some cases retained from an earlier period when women did work in production. Mechanisms for responding to sexual harassment are unevenly established and are typically general-purpose disciplinary tools rather than harassment-specific procedures; none has been tested by an actual case — probably in part precisely because the number of women employed directly in production is negligible. Psychosocial risk is measured by no Georgian instrument and did not surface as a distinct theme in interviews.

The insufficient employment of women limits the scope for assessing gender-specific risks. Respondents treated the non-employment of women in field roles as a given rather than as a company decision, attributing it to an absence of candidates and justifying it primarily through the argument of physical demands. Risk assessment is gender-neutral not by oversight but because of that same given: no producer or laboratory maintains sex-disaggregated injury or incident data. Nor could any respondent recall a gender element in the product and test standards applied. It is also notable that the country has no laboratory accredited to test PPE — accordingly, Georgia has neither the testing infrastructure nor any client demand to support the CEN-CLC/JTC 23 inclusive-equipment agenda. The OSH specialist located the central weakness not in legislation, which in his assessment corresponds to Western frameworks, but in its enforcement. This view maps precisely onto the gender-specific gaps described above: the duties largely already exist on paper, but what they lack is practical application, testing and monitoring specifically in relation to women employees.

The scarcity of data creates a closed circle and, in doing so, renders possible gender-specific risks invisible. Because women are largely absent from production roles, gender-specific risks are not recorded; because they are not recorded, they are not assessed; and because they are not assessed, the sector is treated as one in which the question does not arise at all. The absence of evidence is a data constraint rather than evidence of absence: no national statistical product disaggregates by sex, for this subsector, on working conditions, occupational safety outcomes, protective equipment, training, career progression, management representation or workplace policy — so trends cannot be established, the effects of the 2021 Labour Code amendments cannot be evaluated, and interventions cannot be targeted. The problem is nonetheless relatively straightforward to resolve, since occupational accident statistics already reach the National Statistics Office of Georgia (Geostat) annually from the LIS, and what is missing is only their cross-tabulation and publication by sex and economic activity. The challenge is therefore not the absence of data but its collection and processing in a different manner. What is fragile is the rest of the evidence base, since the instruments this document cites as national entered the framework as deliverables of donor-financed projects and depend on external financing rather than on a statistical mandate. This matters economically as well as legally: the compliance cost of untested duties has not yet been incurred, and it will fall due precisely when segregation begins to ease — the point at which retrofitting infrastructure, equipment and procedures is most expensive. Closing the data gap is therefore a precondition for gender-responsive policy in this sector, not an adjunct to it.

Recommendations, and why the timing matters. For public institutions, the document recommends a voluntary Gender Focal Point network involving GEOSTM, GAC, the MSA and the LIS; sex-disaggregated reporting by the LIS and Geostat, supported by a dedicated sectoral survey; further alignment with ILO Conventions C190, C183, C156 and C081; the introduction of gender-relevant criteria in public procurement; and the establishment of accredited capacity for PPE testing and fit-testing. For enterprises, it recommends gender-sensitive risk assessment conducted before rather than after women begin working in the roles concerned; harassment-specific reporting mechanisms distinct from general disciplinary tools; and the

procurement of documented, individually fitted protective equipment. Almost none of this requires new legislation. The sector's larger producers already undergo recurring third-party audits, both for product certification (UK Certification Authority for Reinforcing Steels (UK CARES), European conformity schemes) and for management systems (ISO 9001, ISO 45001). Product certification, like the declarations required under Regulation (EU) 2024/3110, concerns the performance of goods rather than workforce conditions and cannot carry gender indicators. ISO 45001 occupational health and safety audits, however, provide an existing vehicle into which sex-disaggregated OSH indicators and elements of ISO 53800:2024 could be integrated on a voluntary basis. Other platforms can also be used: more than 300 Georgian companies have signed the Women's Empowerment Principles (WEPs), yet no construction materials producer is among them. Producers themselves do not see a need to integrate gender equality principles into their operations, again because in practice the corresponding need does not arise, but they did identify concrete needs — methodological guidance, case-based training materials, peer-exchange workshops and affordable advisory services. Their demands, it may be said, are practical rather than normative.

As regards the legislative framework, the following should be noted: Regulation (EU) 2024/3110, which primarily governs the placing on the market of construction products, as well as their performance, sustainability and safety, has applied since 8 January 2026 and requires corresponding amendments to Decree No. 476/2018. The Regulation itself does not contain any gender-related provisions. In addition, the entry into effect of the principal provisions of the Law on Public Procurement, originally scheduled for 1 January 2027, has been postponed to 1 January 2030.[4] The implementation of the Law still requires the adoption of the relevant secondary legislation, which will define, inter alia, the detailed rules for carrying out the procedures provided for by the Law and the related requirements. This provides an opportunity to incorporate gender-responsive provisions into the relevant secondary legislation at the stage of its adoption and entry into effect, thereby avoiding the loss of another regulatory cycle.

[4] Law of Georgia No. 1687-Vმს-XIმპ of 10 June 2026 amending the Law of Georgia on Public Procurement, Article 100.