Implemented by:

PTB
Physikalisch-Technische Bundesanstalt
Nationales Metrologieinstitut

13.10.2026

INTEGRATING GENDER EQUALITY INTO WORK SAFETY AND RELEVANT STANDARDS IN GEORGIA'S CONSTRUCTION MATERIALS SECTOR

This policy brief was funded by the German Federal Ministry for Economic Cooperation and Development (BMZ) in the framework of a bilateral cooperation project implemented by the Physikalisch-Technische Bundesanstalt (PTB)

Empowering Change

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1. SCOPE AND ANALYTICAL FRAME

Construction materials value chain: The policy brief covers extraction, processing, manufacture, transport and storage.

Occupational safety and health (OSH): refers to the prevention and management of occupational accidents and work-related injuries, diseases, and psychosocial harm at workplace and system level, consistent with International Labour Organization (ILO) and World Health Organization (WHO) framing.

Gender-responsive OSH: Although not a separate regulatory domain, this paper focuses on the application of standard OSH duties in ways that explicitly address sex differences, gender roles, reproductive considerations, task allocation, data bias, and inequitable participation in safety systems. The clearest formal definition comes from International Organization for Standardization (ISO) and International Electrotechnical Commission (IEC) guidance: such standards consider how gender affects their content, requirements, and application so that women's and men's needs are equally addressed[1].

Abbreviations

Abbreviation	Description
ACAA	Agreement on Conformity Assessment and Acceptance
BAuA	Federal Institute for Occupational Safety and Health (Germany)
BMZ	German Federal Ministry for Economic Cooperation and Development
BWI	Building and Wood Workers' International
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
CEN	European Committee for Standardization
CEN-CLC/JTC 23	CEN and CENELEC Joint Technical Committee 23 on Horizontal Topics for Personal Protective Equipment
CENELEC	European Committee for Electrotechnical Standardization
CIPM MRA	International Committee for Weights and Measures Mutual Recognition Arrangement
CPR	Construction Products Regulation (Regulation (EU) No 305/2011)
CPWR	The Center for Construction Research and Training
DCFTA	Deep and Comprehensive Free Trade Area
DoPC	Declaration of Performance and Conformity
DPP	Digital Product Passport
EA	European co-operation for Accreditation
EBRD	European Bank for Reconstruction and Development
EN	European Standard
EU	European Union
EU-OSHA	European Agency for Safety and Health at Work
EURAMET	European Association of National Metrology Institutes
GAC	Georgian Accreditation Center
GDP	Gross Domestic Product
Geostat	National Statistics Office of Georgia
GEOSTM	Georgian National Agency for Standards and Metrology
Global ACI	Global Accreditation Cooperation Incorporated
GOST	State Standard (Soviet-era standards system)

[1] ISO/IEC Joint Strategic Advisory Group on Gender-Responsive Standards (JSAG GRS), 'Guidance for ISO and IEC Technical Committees on Gender-Responsive Standards' (2021); ISO 53800:2024, Guidelines for the Promotion and Implementation of Gender Equality and Women's Empowerment.

HSE	Health and Safety Executive (UK)
IEC	International Electrotechnical Commission
IFI	International Financial Institution
ILO	International Labour Organization
INAIL	Italian National Institute for Insurance against Accidents at Work
ISO	International Organization for Standardization
JSAG GRS	ISO/IEC Joint Strategic Advisory Group on Gender-Responsive Standards
KII	Key Informant Interview
KPI	Key Performance Indicator
LEPL	Legal Entity of Public Law
LIS	Labour Inspection Service
MLA	Multilateral Recognition Arrangement
MoESD	Ministry of Economy and Sustainable Development of Georgia
MSA	Market Surveillance Agency
NACE	Statistical Classification of Economic Activities in the European Community
OSH	Occupational Safety and Health
PPE	Personal Protective Equipment
PTB	National Metrology Institute of Germany (Physikalisch-Technische Bundesanstalt)
QI	Quality Infrastructure
SDG	Sustainable Development Goal
SME	Small and Medium Enterprise
STEM	Science, Technology, Engineering and Mathematics
TCSA	Technical and Construction Supervision Agency
UK CARES	UK Certification Authority for Reinforcing Steels
UN	United Nations
UN Women	United Nations Entity for Gender Equality and the Empowerment of Women
UNECE	United Nations Economic Commission for Europe
WEF	World Economic Forum
WEPs	Women's Empowerment Principles
WHO	World Health Organization
WP.6	UNECE Working Party on Regulatory Cooperation and Standardization Policies

2. 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[2], 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 where the country's QI institutions could be made to do so. 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 Georgian 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: exclusion precedes exposure. 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 is not. 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

[2] 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".

construction products, Decree 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 between 2021 and 2022, conducted active enterprise inspections; its 2025 report records 2,045 inspections on occupational safety compliance 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. Administrative fines remain capped at GEL 50,000, and ILO Convention No. 81 on labour inspection remains unratified. [3]

Two QI institutions have taken action. GEOSTM signed the UNECE Declaration in February 2020 and has a Gender Action Plan for 2025–2027 with a designated 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 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[4] 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). The national practices of the European countries examined in this document are operational rather than declaratory. For Georgia, this means an opportunity to develop corresponding instruments that would establish a procedural — rather than legislative — framework.

[3] 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).

[4] 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".

Primary findings: the low representation of women means the risks cannot be tested in practice. The study found near-total occupational segregation between office 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, 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 pre-existing 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, the 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 Nos. 190, 183, 156 and 81; 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.[5] 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

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

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.

3. INTRODUCTION AND BACKGROUND

Georgia's construction materials manufacturing sector operates under occupational safety and technical standards frameworks that do not account for gender-specific risks and needs, leaving women workers under-protected, national QI institutions without a mandate to address this gap, and Georgia's EU alignment obligations on gender mainstreaming unmet.

The construction materials manufacturing sector occupies a paradoxical position in Georgia's development trajectory. It is one of the country's most visible industrial sectors, supplying virtually every major infrastructure, housing, and energy project, while remaining institutionally and analytically invisible from the perspective of gender policy. National gender strategies, the country profiles of the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women), the Public Defender's Gender Equality Department, and donor programmes have focused on female political representation, gender-based violence, and feminised low-wage sectors such as education and healthcare. By focusing narrowly on highly feminised sectors, gender policy has largely left the highly masculinised ones (and the women who do work within them) under-researched and under-protected.

4. METHODOLOGY

This study applies a mixed qualitative research methodology combining structured secondary data analysis with targeted primary data collection through KIIs. This approach ensures a comprehensive assessment of both the formal regulatory framework and the practical implementation realities related to gender equality, occupational safety, and standards in Georgia's construction materials manufacturing sector.

The desk review covers national legislation, sector-specific standards, conformity assessment procedures, workplace safety protocols, and the mandates and operational practices of relevant QI institutions. Findings are analysed through three lenses: a gender mainstreaming lens identifying differentiated impacts and needs; a QI system functions analysis covering standardisation, accreditation, testing, and market surveillance; and a gap and entry-point analysis identifying where regulatory or procedural changes are feasible.

Primary data are collected through semi-structured KIIs with 17 stakeholders across the public and private sectors, including representatives of policy-making bodies, QI institutions, labour safety enforcement authorities, construction materials manufacturers of different sizes and testing laboratories. Interview guides are tailored by stakeholder group and focus on practical challenges in applying standards and OSH rules, gender-specific risks and barriers in the workplace, institutional processes for standard-setting and enforcement, and opportunities for integrating gender considerations into existing frameworks.

In total, 17 KIIs were completed: GEOSTM, GAC, one laboratory expert, five construction-materials testing laboratories (independent, producer in-house, and university-based), eight construction materials manufacturers spanning cement, ready-mixed and reinforced concrete, concrete products, tiles, bricks, paints and dry mixes, and metal constructions; and one independent accredited OSH specialist. The planned interviews with the MSA, the LIS and employer

associations could not be conducted. Where these institutions are discussed below, the evidence derives from desk research and from completed KIIs with other stakeholders. This is a material limitation rather than a procedural one: the enforcement and social-dialogue perspectives are represented only indirectly, and the findings concerning the MSA and the LIS in Section 8 rest on published sources alone.

Secondary and primary data are integrated through systematic triangulation, confirming or refining initial assumptions and clearly distinguishing between policy-level recommendations — covering laws, standards, and institutional mandates — and operational recommendations covering procedures, guidance, and capacity-building.

5. SECTOR PROFILE OF GEORGIA'S CONSTRUCTION MATERIALS INDUSTRY

Georgia's construction materials manufacturing sector is a moderate-sized but strategically central component of the country's industrial output. The construction sector has accounted in recent years for approximately 8–10% of gross domestic product (GDP) and 7–8% of formal employment, while industry as a whole represents around one-fifth of GDP, with construction supporting upwards of 70,000 direct jobs.[6]

This section profiles the sector along the three dimensions that determine what gender-responsive policy can realistically achieve in it. Subsection 5.1 sets out the industrial structure — which segments exist, how concentrated they are, and who the duty-bearers therefore are — because ownership, scale and certification exposure determine which instruments can reach workers at all. Subsection 5.2 traces the public regulatory environment and its convergence with the EU acquis, which sets the direction and pace of mandatory change. Subsection 5.3 maps the non-state layer — company and supplier codes, financing conditions, buyer requirements and social dialogue — through which most gender-related commitments in heavy industry are in practice made and monitored. Together these establish the institutional field within which the gender landscape described in Section 6 has taken shape.

5.1 INDUSTRIAL STRUCTURE AND POINTS OF POLICY LEVERAGE

The sector is barbell-shaped. A small number of large, capital-intensive and certification-exposed plants account for most formal employment and virtually all export-relevant output, while several hundred small and medium enterprises (SMEs) occupy the fragmented tail. The two groups are reachable by entirely different instruments, and the segments below are described with that distinction in view.

Cement, clinker and concrete. Cement and clinker production is concentrated in the operations formerly held by Heidelberg Materials — the Kaspi and Rustavi cement plants, the Poti grinding mill, the Supsa terminal, two aggregates facilities and a fleet of stationary and mobile concrete plants — and in the Kavkaz Cement Group (Avchala plant in Tbilisi, Kavkaz Cement West in Poti). Following Heidelberg Materials' 2023 divestment of its 45% stake in Caucasus Cement Holding to

[6] Geostat, Business Sector in Georgia, 2020–2024.

Cement Invest — a vehicle representing the Georgian Co-Investment Fund, Hunnewell Partners and family interests of David Bezhuashvili — the plants are operated as Hunnewell Cement, which has since installed a new dry-process line at Rustavi and modernised the Kaspi facility.[7] The operation employs approximately 1,200 direct workers alongside more than 5,000 additional workers engaged through contractors and subcontractors, and supplies cement and concrete to substantially all major infrastructure projects in the country.[8] Three features make this segment the sector's principal point of leverage: employment scale, near-total dependence of publicly and donor-financed infrastructure on a single supplier group, and the presence of enterprise-level trade union representation. The ratio of contracted to direct labour also means that any instrument confined to the direct payroll will reach less than one worker in five.

Steel and rebar. Steel and rebar production is concentrated in Rustavi: Rustavi Steel LLC (the historical Soviet-era metallurgical complex, producing reinforcing bars, seamless pipes and pig iron) and GeoSteel LLC, a joint venture producing thermo-mechanically treated rebar, the only producer in the Caucasus holding UK CARES, American and European certifications, employing approximately 500 people with company-reported cumulative tax contributions exceeding USD 102 million. This segment is the most externally disciplined in the sector: third-party product certification, export-market requirements and a history of international financial institution (IFI) lending all impose recurring audit and disclosure obligations, into which gender-responsive requirements can be inserted at low marginal cost.

Other sub-sectors. Bricks and blocks, gypsum, ceramics, glass, asphalt and insulation are produced by a more fragmented set of SMEs that are important employers in regional centres. Certification exposure is low, IFI financing is rare, union presence is negligible and human-resource functions are typically informal. For this tail, voluntary and buyer-driven instruments have no realistic transmission channel; regulation, labour inspection, and business-association or donor-mediated guidance are the only feasible routes.

Implications. Sectoral concentration is the central structural fact for policy design. Because a handful of enterprises account for the greater part of formal employment, firm-level instruments — supplier codes, procurement clauses, financing covenants, collective agreements and management-system certification — can affect a large share of the sector's workforce through a very small number of counterparties, and can be piloted without legislative change. Conversely, because the remainder of the sector consists of small enterprises with no external audit exposure, the same instruments are inoperative there, and only statutory obligation and inspection capacity apply. The recommendations in Section 11 are differentiated accordingly.

5.2 MACRO-REGULATORY LANDSCAPE AND THE PATH TO EUROPEANISATION

Georgia's institutional framework for QI and OSH has undergone a profound structural shift — from deliberate deregulation toward systematic alignment with EU standards — across a period spanning roughly two decades.

[7] https://www.bwint.org/BwiNews/NewsDetails?newsId=1635
[8] https://www.globalcement.com/news/16300-heidelberg-materials-exits-georgian-joint-venture

Following the November 2003 Rose Revolution, the new government pursued a programme of economic liberalisation. Its most consequential labour-market measure was the 2006 Labour Code, which simultaneously abolished the Labour Inspectorate, the Employment Service and the Labour Administration. A partial corrective was introduced only in 2015, when a Labour Conditions Inspection Department was re-established within the Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs of Georgia, though with a narrow OSH-only mandate and limited to enterprises that consented to inspection.

The 2014 Association Agreement between the EU and Georgia served as the first critical pivot point, embedding a mandatory approximation agenda within its Deep and Comprehensive Free Trade Area (DCFTA) component. The second came on 14 December 2023, when the European Council granted Georgia EU candidate status[9], conditional on the fulfilment of nine structural reform priorities. While none of those nine conditions addresses QI or OSH directly, they provide the governance context within which technical approximation must proceed; the Commission's annual Enlargement Reports assess progress across all 33 acquis chapters, including Chapter 1 (free movement of goods) and Chapter 19 (social policy and employment).[10]

DCFTA obligations on QI and OSH are structured across two main axes. On QI, Annex III-A of the Association Agreement identifies the EU's horizontal product-marketing legislation — including Regulation (EC) No 765/2008 on accreditation and market surveillance and the General Product Safety Directive — as the reference framework, while Annex III-B lists 21 New Approach sectoral directives for full legislative approximation, covering machinery, lifts, pressure equipment, toys, electromagnetic compatibility, PPE, construction products and others. Approximation windows range from four to eight years from the Agreement's entry into force, with the prospect of an Agreement on Conformity Assessment and Acceptance (ACAA) — enabling CE-marked product equivalence — as the end-state reward for verified transposition. On OSH, Annex XXX commits Georgia to transpose the EU OSH Framework Directive (89/391/EEC) and its daughter directives, covering workplaces, work equipment, manual handling, display screen equipment and chemical-agent occupational exposure limits, alongside the Working Time Directive (2003/88/EC). By end-2023 Georgia had transposed approximately 15 of the 21 New Approach directives[11].

The QI institutional architecture for industrial products rests on three legal entities of public law (LEPLs): GEOSTM, an International Committee for Weights and Measures Mutual Recognition Arrangement (CIPM MRA) signatory and European Association of National Metrology Institutes (EURAMET) full member; GAC, a Category A member of the European co-operation for Accreditation (EA) and a full member and Multilateral Recognition Arrangement (MLA) signatory

[9] Georgia's candidate status is de facto stopped; please see the footnote above.

[10] European Commission, '2024 Georgia Report' (SWD(2024) 693 final), Chapter 19 (Social Policy and Employment) and Chapter 1 (Free Movement of Goods); European Commission, '2025 Georgia Report' (provisional).

[11] EU–Georgia Association Agreement, 2014/384/EU, OJ L 261/4 (30 August 2014): Annex III-A (horizontal QI legislation), Annex III-B (New Approach directives), Annex XXX (OSH directives). Transposition status: Government of Georgia, Ministry of Economy and Sustainable Development, QI Approximation Progress Report 2023.

of Global Accreditation Cooperation Incorporated (Global ACI); and the Technical and Construction Supervision Agency (TCSA), which oversees high-risk facilities (lifts, pressure equipment, cableways). The MSA should also be regarded as an important contributor to the QI system, since it supervises the conformity of construction products placed on the market.

Despite this structural progress, the European Commission's 2024 and 2025 Enlargement Reports record no progress on the free movement of goods for two consecutive reporting cycles, and progress on social policy and employment deteriorated from "limited" (2024) to "no progress" (2025). The Commission's 2025 Report concludes that Georgia is a "candidate country in name only". On enforcement, the LIS — which grew from 113 to 167 inspectors between 2021 and 2022 — conducted approximately 1,901 enterprise inspections in 2024, against a total labour force of around 1.6 million persons. Georgia has not yet ratified ILO Convention No. 81 on Labour Inspection, a step explicitly recommended in the 2024 Enlargement Report. Maximum administrative fines under the OSH law remain capped at GEL 50,000 (approximately USD 18,000), widely regarded as insufficient to deter large employers. The EU suspended direct bilateral grant assistance to Georgian state bodies in June 2024, redirecting support to civil society and the private sector alone; according to eu4georgia.eu, this amounts to a total loss of EUR 121 million from the 2022–2024 bilateral allocations.

Looking ahead, the new EU Construction Products Regulation (Regulation (EU) 2024/3110), which repeals Regulation (EU) No 305/2011 with effect from 8 January 2026, introduces a new framework for construction products, including Digital Product Passports (DPPs), Declarations of Performance and Conformity (DoPC), and environmental and sustainability performance information. However, DPP requirements are to be introduced progressively for different product families through the relevant delegated and implementing acts and are not mandatory from 8 January 2026. Georgia's Decree No. 476/2018, which was modelled on the previous EU framework, will therefore need to be reviewed and progressively aligned with the updated EU acquis. In the context of Georgia's commitments under the DCFTA, timely alignment of the national framework with relevant developments in the EU acquis — including digital product information and sustainability-related requirements — will be an important test of the country's continued approximation with EU standards in the QI sphere[12].

5.3 ENABLING ENVIRONMENT FOR GENDER EQUALITY IN THE SECTOR

Statutory obligations are analysed in Section 7, and international standards and comparative practice in Section 9. Between the two sits a layer of non-state governance — corporate policy and codes of conduct, requirements imposed through supply and subcontracting chains, financing conditions, buyer and certification pressure, public procurement criteria, and collective bargaining — through which gender commitments in heavy industry are in practice made operational. In Georgia's construction materials manufacturing sector this layer is characterised less by absence of commitment than by absence of instruments: general commitments have

[12] Regulation (EU) 2024/3110 of the European Parliament and of the Council of 27 November 2024 on construction products, OJ L 2024/3110 (replaces Regulation (EU) No 305/2011 from 8 January 2026).

been entered into, but the documents, criteria and procedures that would translate them into workplace practice are largely not in place, and in the largest segment the mechanisms that previously existed have lapsed.

Corporate commitments and codes of conduct. The sector's largest producer is a member of United Nations (UN) Global Compact Network Georgia, with commitments spanning human rights, labour rights, environmental protection and anti-corruption, and maintains corporate social responsibility and supplier information pages.[13] Desk research did not, however, identify a published code of conduct, supplier code of conduct, or gender or diversity policy for any of the sector's largest producers.[14] The contrast with the preceding ownership arrangement is instructive. Until 2024 the same operations sat within a European listed group whose published instruments included a Code of Business Conduct, a global Supplier Code of Conduct enforceable through contract termination, a Group Health and Safety policy, a human rights policy statement and a confidential reporting system, and whose sustainability commitments included a numerical target for women in leadership positions.[15] What lapsed on divestment was therefore not a general orientation but a specific and auditable set of instruments, including a quantified gender target. Exposure to the emerging European corporate sustainability due diligence regime is correspondingly indirect, reaching Georgian producers, if at all, as requirements imposed by customers and lenders rather than as their own reporting obligations.

Subcontracted labour. The reach of such instruments is a substantive rather than a formal question in this sector. The largest producer directly employs approximately 1,200 people and supports the employment of more than 5,000 additional workers through contractors and subcontractors.[16] Women in the sector are concentrated in administrative, laboratory, cleaning and catering functions (Section 6.3), which are among the most frequently outsourced. Supplier

[13] UN Global Compact Network Georgia, member profile: Hunnewell Cement, listing the organisation under sector "Construction" with commitment areas of human rights, labour rights, environmental protection and the fight against corruption, https://unglobalcompact.ge/en/member/hanivel-cementi/ (accessed 5 August 2026)

[14] Hunnewell Cement (LLC Kartuli Cement, ID 230866435), corporate website, https://hunnewellcement.com/en/ (accessed 5 August 2026). Corporate social responsibility and supplier information pages are maintained under the Company menu; no code of conduct, supplier code or gender or diversity policy document is published. Equivalent searches were conducted for Kavkaz Cement Group, Rustavi Steel LLC and GeoSteel LLC.

[15] Heidelberg Materials AG, *ESG documents and policies*, https://www.heidelbergmaterials.com/en/sustainability/esg-documents-and-policies — listing a Supplier Code of Conduct, Code of Business Conduct, Group Health & Safety policy, Policy Statement on Human Rights, and anti-corruption policy; Heidelberg Materials AG, *Sustainability beyond CO_2 reduction* — Sustainability Commitments 2030 include ensuring that 25% of leadership positions are filled by women, alongside occupational health and safety and sustainable supplier structure commitments; Heidelberg Materials, *Policy Statement on Human Rights* — the global Supplier Code of Conduct standards are applied in assessing new supplier relationships, and suppliers must commit to internationally recognised human rights and environmental standards and obtain corresponding commitments from their own suppliers; suppliers are subject to contract termination for violation of the Supplier Code of Conduct. See also Heidelberg Materials Northern Europe, *Supplier Code of Conduct*, March 2022, a regional instrument of the same group

[16] Hunnewell Cement company description: the company directly employs approximately 1,200 individuals and supports the employment of over 5,000 additional people through contractors and sub-contractors; it operates two full-cycle plants at Kaspi and Rustavi, a cement mill in Poti, two aggregates enterprises, a cement terminal at Supsa and seven stationary and nine mobile concrete plants, and is the only clinker producer in the country.

codes of conduct — the standard instrument through which contracted workforces are brought within a company's labour and safety commitments — are consequently the mechanism whose absence bears most directly on women in the sector, and any measure confined to the direct payroll would reach fewer than one in five workers associated with the operation.

Financing conditions. Where producers borrow from IFIs, lenders' environmental and social requirements apply at project level, covering non-discrimination, worker grievance mechanisms and OSH. GeoSteel has been a European Bank for Reconstruction and Development (EBRD) client since the original financing of the Rustavi mini-mill,[17] and the EBRD's gender equality strategy (Section 9.2) provides an established basis for gender-related covenants in future industrial transactions. Recent experience in the same industrial city illustrates both the leverage and its limits: following the 2023 acquisition of Rustavi Azot by Indorama Corporation and a subsequent EBRD loan of USD 65 million, the company committed to negotiate a new collective bargaining agreement after a period marked by mass layoffs and restrictions on freedom of association, while grievances concerning unequal pay and working conditions remained unresolved.[18] Financing conditionality can therefore move labour governance in Georgian heavy industry, but it does not by itself resolve substantive equality questions.

Buyer and certification pressure. Product certification held in the sector, including UK CARES and European conformity schemes, and management-system certification such as ISO 9001 and ISO 45001, impose recurring third-party audit cycles, as will the declaration and disclosure architecture of Regulation (EU) 2024/3110. None of these instruments is gender-specific. Their significance is procedural: they constitute existing audit, documentation and disclosure machinery into which sex-disaggregated indicators and elements of ISO 53800:2024 (Section 9.1) could be introduced without new legislation and at low marginal cost.

Buyer and certification pressure. Product certification held in the sector, including UK CARES and European conformity schemes, imposes recurring third-party audit cycles, as will the declaration and disclosure architecture of Regulation (EU) 2024/3110. These instruments, however, address the performance, safety and environmental characteristics of products and do not examine workforce composition or working conditions; none of them is gender-specific, and they cannot realistically host gender indicators. Management-system certification is different in this respect. ISO 45001 audits already review hazard identification, risk assessment, worker participation and incident recording, and therefore offer an existing procedural channel into which sex-disaggregated OSH indicators and elements of ISO 53800:2024 (Section 9.1) could be introduced on a voluntary basis, without new legislation.

[17] EBRD, *Geo Steel*, project summary document, project ID 38146 — construction and operation of a steel mini-mill of 175,000-tonne capacity in Georgia, producing reinforcement bar principally for the Georgian and Armenian markets, the first steel-making operation in Georgia following closure of the neighbouring integrated works. See also EBRD, *Environmental and Social Policy*, Performance Requirement 2 (Labour and Working Conditions).

[18] EBRD, *EBRD supports modernisation of fertiliser production in Georgia*, July 2025 — a USD 65 million loan to Rustavi Azot, part of Indorama Corporation since 2023, for a low-density ammonium nitrate plant and energy-efficiency upgrades; CEE Bankwatch Network, commentary of October 2025 — prior to the 2023 acquisition the plant was subject to mass layoffs, crackdowns on organised labour and violations of freedom of association; the company subsequently committed to negotiate a new collective bargaining agreement, while grievances including unequal pay and unsafe working conditions remained unresolved.

Public procurement. Given the dependence of sectoral demand on publicly and donor-financed construction, procurement is potentially the most powerful mechanism available. The new Law on Public Procurement, adopted on 9 February 2023 in the framework of the Association Agreement, incorporates sustainability and social considerations for the first time and encourages contracting authorities to apply social criteria in tender documentation.[19] Its principal provisions, initially deferred from 1 January 2025 to 1 January 2027, were further postponed to 1 January 2030 by the amendment of 10 June 2026, while the requirement for contracting authorities to employ certified procurement specialists will apply from 1 January 2032. The secondary legislation establishing rules, thresholds and priority product lists will need to be adopted ahead of the Law's entry into force.[20] This leaves a defined and closing window in which gender-relevant award criteria and contract-performance clauses — protective equipment fit, sanitary provision, harassment procedures, sex-disaggregated workforce reporting — could be specified for construction materials and works contracts.

Voluntary national architecture. Georgia's voluntary corporate-sustainability infrastructure is comparatively well developed. UN Global Compact Network Georgia has over 150 corporate and organisational members, including the largest cement producer and the largest construction company,[21] and the WEPs signatory base has grown from five companies in 2016 to more than 300 by December 2025[22]. No construction materials producer was identified among WEPs signatories. The architecture therefore reaches the sector at the level of general commitment but not at the level of gender-specific commitment — a gap that is addressable through existing memberships rather than requiring new institutions.

Social dialogue. Enterprise-level union representation exists at the Rustavi and Kaspi cement plants through the Georgian Constructors and Foresters Independent Trade Union, an affiliate of the Building and Wood Workers' International (BWI). A mission conducted on 29–30 June 2026 brought the global union federation, the national affiliate and plant-level representatives together with company management to discuss social dialogue, working conditions, OSH, skills

[19] Law of Georgia on Public Procurement, adopted 9 February 2023. Prepared by the State Procurement Agency within the framework of the EU Association Agreement with the aim of approximating Georgian legislation to that of the European Union, and directed at taking environmental, social and economic aspects into account from the perspective of sustainable development. EU4Environment, *New Public Procurement Law in Georgia with EU4Environment support*, 2023 — the project supported the elaboration and integration of sustainability and social provisions, and the Law encourages state procurers to use sustainability and social criteria in tender documents.

[20] Law of Georgia No. 1687-Vმს-XIმპ of 10 June 2026 amending the Law of Georgia on Public Procurement, Article 100: Articles 1–15, Article 16(2)–(11) and Articles 17–96 enter into force on 1 January 2030, and Article 16(1) and (12) on 1 January 2032, https://matsne.gov.ge/ka/document/view/6886877; Parliament of Georgia, press release of 10 June 2026. For the earlier deferral from 1 January 2025 to 1 January 2027: Parliament of Georgia, plenary proceedings on amendments to the Law on Public Procurement. On the content of the Law: interview with Kakha Demetrashvili, Deputy Chairman, State Procurement Agency, in UN Global Compact Network Georgia, *Sustainability Spotlight* — sustainable, green, energy-efficient and social public procurement was included in the legislation for the first time.

[21] UN Global Compact Network Georgia, *Sustainability Spotlight*: more than 150 companies and organisations in Georgia have joined the UN Global Compact and pledged adherence to its ten principles; member profile: Anagi, described as the largest construction company in Georgia.

[22] UN Women Georgia, "Ten years of the Women's Empowerment Principles in Georgia", 5 December 2025, https://georgia.unwomen.org/en/stories/news/2025/12/ten-years-of-the-womens-empowerment-principles-in-georgia

development, collective bargaining, subcontracting practices, and the inclusion of women and young workers.[23] Collective agreements are thus a live and, on present evidence, largely unused vehicle for provisions on protective equipment fit, sanitary facilities and harassment procedures. The existence, coverage and content of any collective agreement currently in force could not be established from public sources.

Evidence limitation. This mapping rests on desk research and publicly available company disclosures. Employer associations and trade unions were not included in the KII sample (Section 4), and company-level policies that are not published cannot be excluded. The absence of identifiable instruments should therefore be read as an evidence gap requiring verification rather than as confirmed absence — a limitation consistent with the more general scarcity of gender-specific information in the sector documented in Section 6.4.

6. GENDER LANDSCAPE: WOMEN IN GEORGIA'S CONSTRUCTION MATERIALS MANUFACTURING SECTOR

Georgia's overall female labour force participation rate has hovered around 40–44% (working-age women, against approximately 62–66% for men) since 2016. The COVID-19 crisis substantially worsened female participation, with women accounting for approximately 98% of the 48,000-person decrease in the Georgian labour force in 2020. UN Women's 2020–2021 Time Use Survey — Georgia's first ever — confirmed that Georgian women dedicate roughly five times more hours to unpaid domestic and care work than men.

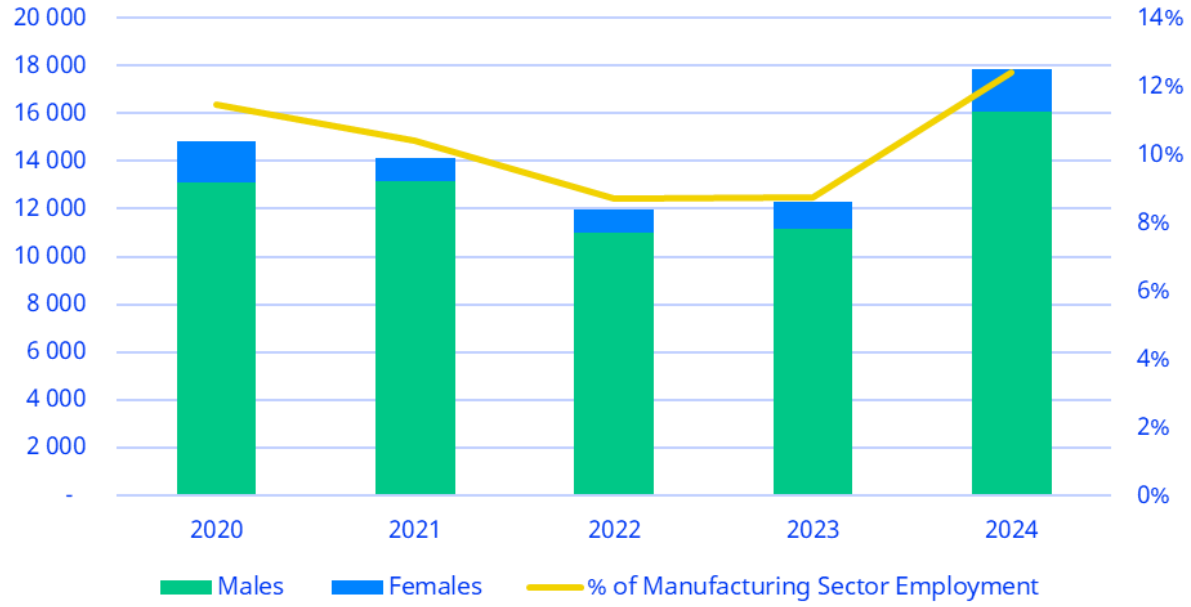
6.1 EMPLOYMENT IN CONSTRUCTION MATERIALS MANUFACTURING

From the employment perspective, construction materials manufacturing represents around 10% of the manufacturing sector employment over the past 5 years. Female workers represent a relatively small share of construction materials manufacturing employment — around 10% of the subsector total[24].

Figure 1 – Number of Employees in Construction Materials Manufacturing and Its Share in Manufacturing Sector Employment

[23] Building and Wood Workers' International, *BWI mission to Georgia focuses on cement, construction, forestry, and future partnership*, 10 July 2026 — a mission on 29–30 June 2026 to meet the Georgian Constructors and Foresters Independent Trade Union; the delegation met management of the Rustavi plant, operated by Hunnewell Cement since 2024, with plant union representatives present, and discussed social dialogue, decent working conditions, occupational health and safety, skills development and the inclusion of women and young workers, as well as collective bargaining and subcontracting practices, https://www.bwint.org/BwiNews/NewsDetails?newsId=1635.

[24] Geostat, Labour Force Survey



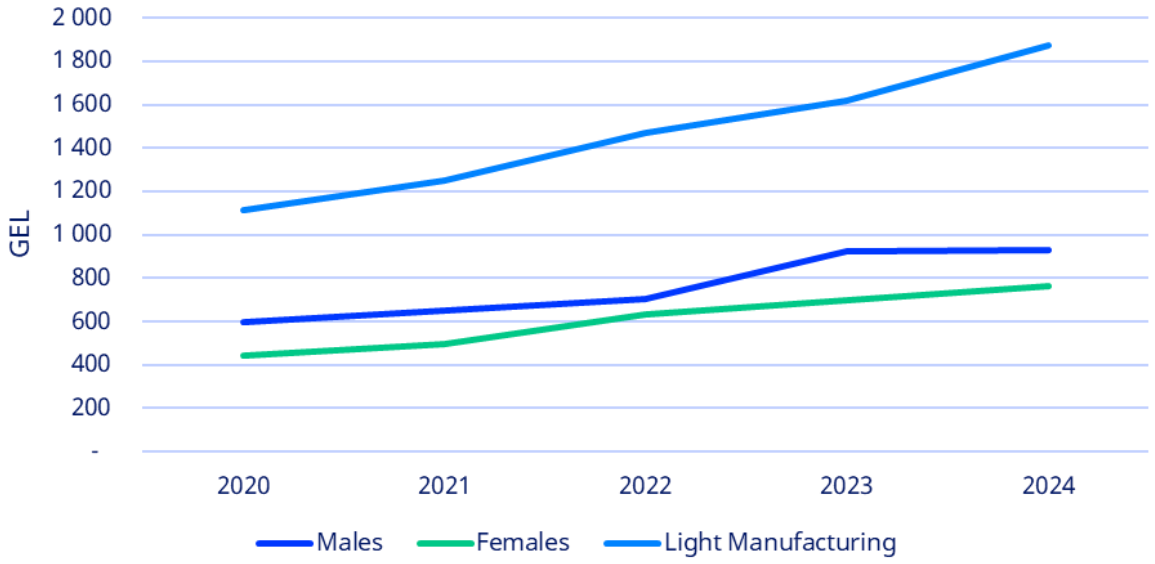
Source: Authors' calculations based on Geostat Labour Force Survey

6.2 GENDER PAY GAP

The gender pay gap is large and unusually persistent. Geostat's adjusted gender pay gap series — first published in February 2022 with UN Women support, making Georgia the first country in the region to disseminate adjusted statistics — estimated the adjusted hourly gender pay gap at 15.9% in 2020 and 15.7% in 2021, while the unadjusted monthly gap stood at approximately 31% in 2022. By Q2 2025 women's average monthly pay was 1,769.5 GEL against men's 2,655.8 GEL — a gap of 33.3% on an unadjusted basis. The adjusted and unadjusted series are not directly comparable, but the raw gap has widened slightly despite legal reform.

Average nominal wages in the construction materials manufacturing subsector show a distinct pattern. The subsector has substantially lower average wages compared to the overall light manufacturing sector and even lower than the country's average for both males and females. Furthermore, female wages are lower than the average wages for males in the sector. Construction materials manufacturing is therefore a comparatively low-paying subsector within light manufacturing, for women and men alike.

Figure 2 – Average Nominal Wages of Employees in Construction Materials Manufacturing Sector and Light Manufacturing Sector



Source: Authors' calculations based on Geostat Labour Force Survey

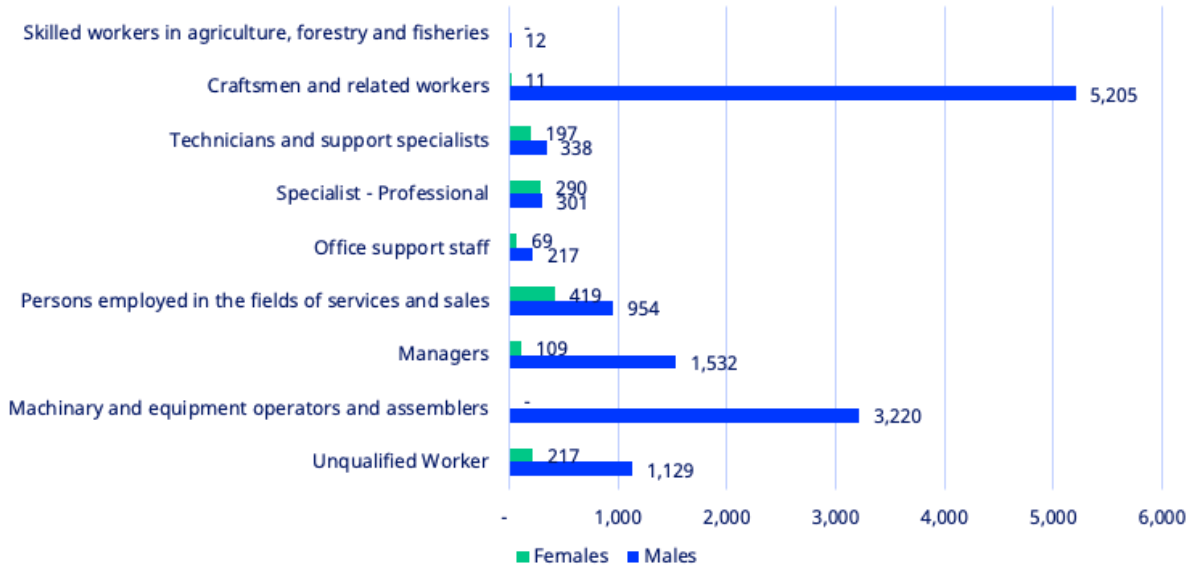
6.3 OCCUPATIONAL SEGREGATION

UN Women's Country Gender Equality Profile of Georgia (2023) confirms that manufacturing and especially construction are more 'masculine' sectors, with roughly one-third of workers needing to switch sectors to equalise the gender distribution.[25] Female participation in 'hard' construction trades is consistently below 5–10%, and in vocational education science, technology, engineering and mathematics (STEM) tracks female enrolment hovers around 14%. Women cluster in administrative, financial, quality-control, and environmental-compliance roles, and are largely absent from production-line, heavy-equipment, kiln and furnace operation, mining, quarrying, and outdoor field roles.

This tendency is even more visible in construction materials manufacturing, where females represent up to 10% of the employees (Figure 1). Based on the Labour Force Survey over the past 5 years, females have been employed more in sales and administrative positions. Figure 3 shows gender distribution by position in the construction materials manufacturing sector.

Figure 3 – Gender distribution of employees by position in construction materials manufacturing

[25] UN Women, Country Gender Equality Profile of Georgia (2023); ILO, 'Women at Work: Trends 2016'; Geostat, Labour Force Survey (occupational distribution by sex, 2019–2023).



Source: Authors' calculations based on Geostat Labour Force Survey

Analysis demonstrates that female workers are concentrated more in professional and sales positions; however, there is a substantial number of females among technicians and support specialists. This suggests that reducing gender disparities in the subsector is likely to require targeted, occupation-specific measures rather than a single overarching regulatory instrument.

6.4 DATA AVAILABILITY AND GAPS

The preceding subsections establish the scale and direction of gender disparity in the construction materials subsector — a female employment share of roughly 10%, wages below both the wider manufacturing average and the national average for women and men alike, and occupational concentration in professional, sales, administrative and support roles. They rest, however, entirely on desk research and secondary data, principally the Geostat Labour Force Survey, and they cover only those dimensions for which a national statistical series exists. Primary evidence on workplace practice is presented separately in Section 10, drawing on the KIIs conducted for this study.

Three limitations qualify the findings above. First, the Labour Force Survey is a household survey designed to produce estimates for the economy and for broad sectoral aggregates; at the level of a subsector employing a small share of manufacturing employment, and for a female subgroup within it, the number of sampled observations supports the identification of general tendencies but not statistical inference or causal analysis — including of the pay differentials reported in 6.2.[26] Second, sex-disaggregated employment data are not regularly published at the level of Statistical Classification of Economic Activities in the European Community (NACE) Divisions 23 and 24, so the figures presented here are the authors' calculations rather than official series. Third, the survey instrument captures employment status, occupation and earnings; it is

[26] Geostat, *Labour Force Survey*, methodology and annual datasets, 2019–2025. Estimates for the construction materials subsector are the authors' calculations; standard errors for female subgroup estimates at this level of disaggregation are correspondingly wide.

not designed to capture working conditions, and it therefore cannot address most of the dimensions relevant to a gender-responsive assessment of the sector.

For those dimensions, no official data exist. There is no national statistical product that disaggregates by sex, for this subsector, on: working conditions; OSH outcomes; the provision and fit of PPE; access to vocational, technical or in-service training; career progression and promotion; representation in management and technical grades; or the existence and use of workplace policies on harassment, maternity protection and grievance handling. Occupational accident statistics are transmitted annually to Geostat by the LIS as an administrative dataset, but no publicly disseminated series cross-tabulates them by sex and economic activity at division level; international reporting frameworks likewise publish occupational injury data either by sex or by economic activity rather than jointly, and Georgia has not ratified ILO Convention No. 160 on Labour Statistics.[27] To the best of our knowledge, no dedicated survey of OSH conditions or protective equipment use, yielding sex-disaggregated results, has been conducted in Georgia for this or any comparable industrial sector. Limited evidence on leadership representation can be assembled from company disclosures — the largest producer's published management team includes women in the human resources and health-and-safety and legal director roles — but such disclosures are neither systematic nor comparable across firms.

What evidence does exist on these dimensions is dispersed across the outputs of donor-financed projects rather than consolidated in any national source. Instruments and datasets relevant to this analysis include the guidelines for assessing harmful and hazardous work for pregnant, post-partum and nursing women, developed by UN Women with the ILO for the LIS and given legal effect by ministerial order in 2020; the adjusted gender pay gap series and the Time Use Survey, both produced by Geostat with UN Women support; successive country gender assessments by UN Women and the World Bank; and the gender action plans adopted by GEOSTM and GAC under UNECE-supported initiatives.[28] Several of these are cited in this brief as national instruments, which is precisely the point: they entered the national framework as project deliverables, and their continuity depends on external financing rather than on a statistical or regulatory mandate.

This fragmentation is itself a constraint on policy, not merely a limitation of this study. In the absence of a baseline, trends cannot be established, subsectors cannot be benchmarked against one another, the effects of legal reforms such as the 2020 Labour Code amendments cannot be evaluated, and interventions cannot be targeted at the firms or occupations where disparities are greatest. It also produces a circularity that recurs throughout this brief: 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. Addressing the data gap is therefore a precondition for gender-responsive policy in this sector rather than an adjunct to it, which is why sex-

[27] Geostat, *Statistical Work Programme 2025*, approved by Decree of the Government of Georgia No. 1861 of 23 December 2024 — statistics on occupational accidents for 2024 are supplied to Geostat by the LEPL Labour Inspection Service in table format, annually, with a 30 May deadline. ILOSTAT, *Safety and health at work* data catalogue — cases of fatal and non-fatal occupational injury are published by sex and migrant status, and separately by economic activity, in distinct tables. Georgia has not ratified ILO Convention No. 160 on Labour Statistics.

[28] UN Women, *Promotion of the Decent Work Agenda for Women in Formal and Informal Sectors in Georgia* (WEESC Phase II).

disaggregated reporting by the LIS and a dedicated sectoral survey on OSH and protective equipment feature among the recommendations in Section 11.

6.5 INSTITUTIONAL GENDER FRAMEWORK

Georgia's institutional gender framework is comparatively well-developed on paper: the Inter-Agency Commission on Gender Equality; the Permanent Parliamentary Gender Equality Council; the Public Defender's Office Gender Equality Department (established 15 May 2013); the State Concept on Gender Equality (2022); the State Concept on Women's Economic Empowerment (2023); and the 2017 ratification of the Istanbul Convention. Concluding Observations (2 March 2023) under the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) commended these mechanisms but raised concerns about persistent labour-market inequality. Georgia ranks 63rd of 148 economies in the World Economic Forum (WEF) Global Gender Gap Index 2025.[29]

7. LEGAL AND REGULATORY FRAMEWORK ANALYSIS WITH A GENDER LENS

Georgia's current QI and OSH regulatory architecture consists of multiple laws and technical regulations. The Product Safety and Free Movement Code (Law of Georgia No. 6157-IS of 8 May 2012) establishes the horizontal framework for product regulation, market surveillance and free circulation of goods, and created the LEPL MSA (operational from 2020). The Organic Law on Occupational Safety — adopted initially as a standard law on 7 March 2018, elevated to Organic Law status on 19 February 2019, and extended to all sectors of the economy from 1 September 2019 — provides the core OSH duty-of-care framework. A major component of this legislation is a technical regulation on PPE (Decree No. 82 of 6 February 2020), which specifies some of the components of the occupational safety law. The Labour Code (as comprehensively amended by Organic Law No. 7177 of 29 September 2020, effective 1 January 2021) introduced mandatory written employment contracts, an overtime cap, rules on weekly rest, night-work protections and equal-pay provisions. The companion Law on the Labour Inspection Service (also adopted 29 September 2020) replaced the narrow 2015 department with a full-mandate LEPL empowered to conduct both OSH and labour-rights inspections across all employers, with the power to enter premises without prior notice or a court order. Finally, the Technical Regulation on Construction Products — adopted by Government of Georgia Decree No. 476 of 1 October 2018 (in force from 15 January 2019, subsequently amended by Decree No. 292 of 19 June 2019) — provides a near-verbatim transposition of EU Regulation 305/2011 (CPR) governing the placing on the market of construction products against harmonised technical specifications.[30]

[29] World Economic Forum, *Global Gender Gap Report 2025*, Geneva, June 2025, https://www.weforum.org/publications/global-gender-gap-report-2025/

[30] Labour Code of Georgia (Organic Law No. 7177, 29 September 2020); Organic Law of Georgia on Occupational Safety (19 February 2019); Ministerial Order No. 01-15/N.

Georgia's legal framework relevant to gender equality, OSH, and construction-materials standards has evolved rapidly since the 2014 EU Association Agreement. From a gender-and-OSH perspective, the local framework can be divided into four layers.

7.1 LAYER 1: FUNDAMENTAL GENDER EQUALITY AND ANTI-DISCRIMINATION LAW

The Law of Georgia on Gender Equality (2010, with amendments through 2025) defines gender equality as a constitutional and human-rights principle. The 2018 constitutional amendment introduced 'substantive gender equality'. The Law on the Elimination of All Forms of Discrimination (2014) prohibits discrimination in all spheres including employment. The May 2019 sexual harassment amendments introduced legal definitions and sanctions for workplace sexual harassment, allowing survivors to seek compensation in court. Between 2020 and 2024 the Public Defender established approximately 14 cases of sexual harassment, the majority in workplaces where the perpetrator was the supervisor[31].

7.2 LAYER 2: LABOUR CODE AND OCCUPATIONAL SAFETY LEGISLATION

The 2020 reform of the Labour Code introduced a comprehensive prohibition on discrimination on the basis of sex, gender, pregnancy, and family responsibilities; enshrined equal pay for equal work; defined sexual harassment; reformed parental leave to allow either parent to take it; and obliged employers to provide a 'maximally safe and healthy' work environment. The Organic Law on Occupational Safety (2018) requires every employer with more than ten employees to employ certified OSH specialists and operate a Health and Safety Management System. Ministerial Order No. 01-15/N (14 February 2020) defined activities harmful to pregnant and breastfeeding women.

Most relevant for the construction materials manufacturing sector, the Labour Code and Occupational Safety Law establish:

- **Restriction on Hazardous Work:** employers prohibited from assigning pregnant or breastfeeding workers to heavy, harmful, or dangerous jobs.
- **Workplace Adaptation:** pregnant or breastfeeding employees may request lighter work or transfer to day shifts based on medical certificates.
- **Time and Rest Guarantees:** prohibition of night work and restrictions on overtime; paid nursing breaks of at least 1 hour per day for mothers with children under one year.
- **Ergonomic PPE:** safety equipment must be designed to fit the user's anatomy, accounting for physiological differences between men and women.
- **Comprehensive Risk Assessment:** employers must identify and evaluate physical, chemical, and biological risks.

[31] Law of Georgia on Gender Equality (2010, as amended through 2025); Law on the Elimination of All Forms of Discrimination (2014); Law of Georgia No. 4460-IIs (May 2019, introducing sexual harassment provisions); Public Defender of Georgia, Annual Report 2023 (Gender Equality Chapter).

7.3 LAYER 3: QUALITY INFRASTRUCTURE AND CONSTRUCTION-PRODUCTS LEGISLATION

The framework instrument for QI is the Product Safety and Free Movement Code (Law of Georgia No. 6157-IS of 8 May 2012). Rather than separate statutes on standardisation and accreditation, the Code contains dedicated chapters on standardisation, the uniformity of measurements, accreditation, and conformity assessment of products and services, the accreditation provisions being aligned with Regulation (EC) No 765/2008. GEOSTM and GAC derive their mandates from the Code read together with the Law on Legal Entities under Public Law and their respective statutes; the 1999 Law on Standardisation was superseded by the Code. The sector-specific instrument is the Technical Regulation on Construction Products, approved by Government of Georgia Decree No. 476 of 1 October 2018, in force from 15 January 2019 and amended by Decree No. 292 of 19 June 2019, which closely follows EU Regulation No. 305/2011. Its product scope, introduced in phases, now extends to construction products generally rather than to a limited list of product families.

None of these instruments contains gender-specific provisions. For product legislation this is unsurprising: it regulates the performance characteristics of goods placed on the market, not the conditions under which those goods are manufactured. Two consequences follow for this study. First, the gender-relevant entry points within the QI system lie elsewhere: in the technical regulation governing PPE as a product, where fit and anthropometric range are determined by the underlying harmonised European standards (Section 9.3); in the standards-development process itself, where committee composition and gender-impact screening determine whether the neutral-worker assumption is reproduced (Section 9.1); and in the QI institutions in their capacity as employers and accreditors (Section 8). Second, the employer's duty to select and provide protective equipment suited to the individual worker arises not under construction-products law but under the Organic Law on Occupational Safety and the technical regulation on PPE (Decree No. 82 of 6 February 2020) discussed in 7.2. The distinction matters practically, because it places enforcement with the LIS rather than with the market-surveillance system.

- **Construction Products:** Conditions for placing construction products on the market against harmonised technical specifications, including declarations of performance and applicable conformity-assessment routes.
- **PPE:** design, manufacture and conformity requirements for PPE placed on the market, under the technical regulation transposing the EU PPE framework — distinct from the employer's duty to provide and fit PPE, addressed in 7.2.
- **Supervision:** the MSA supervises the conformity of construction products placed on the market; the TCSA supervises facilities of increased technical risk; the LIS supervises workplace OSH compliance, including the provision of protective equipment.

7.4 LAYER 4: EU ASSOCIATION, DCFTA AND OTHER INTERNATIONAL AGREEMENTS

The EU Association Agreement (in force since 2016) and EU candidate status (granted 14 December 2023) embed obligations to harmonise labour, anti-discrimination, gender-equality,

OSH, and product-safety legislation with the EU acquis. Key instruments include the EU Gender Equality Strategy 2020–2025, the EU Strategic Framework on Health and Safety at Work 2021–2027, the EU Construction Products Regulation 2024/3110, and the EU Machinery Regulation (EU) 2023/1230. Furthermore, Georgia has been an ILO member since 1993 and has ratified a number of relevant conventions, although not the four instruments most directly relevant to gender-responsive OSH in this sector, which remain unratified (see Section 11).

8. QUALITY INFRASTRUCTURE INSTITUTIONS: MANDATES, PRACTICES, AND GENDER MAINSTREAMING

8.1 MINISTRY OF ECONOMY AND SUSTAINABLE DEVELOPMENT (MOESD)

MoESD is the parent ministry of GEOSTM, GAC, MSA, the Skills Agency, and Enterprise Georgia. Under the Association Agreement it ensures Georgia adopts technical regulations equivalent to EU standards. MoESD has gender-equality obligations under the State Concept on Gender Equality and works closely with UN Women. To date, the Ministry's gender programmes have been operationalised primarily through entrepreneurship promotion (the EBRD Women in Business Programme, reaching over 200 women entrepreneurs) rather than through QI sub-systems.

8.2 GEORGIAN NATIONAL AGENCY FOR STANDARDS AND METROLOGY (GEOSTM)

Established 7 October 2005, GEOSTM serves as Georgia's national standards body, hosts the Metrology Institute of Georgia, and adopts European Standards (EN) and ISO standards as Georgian standards (according to the CEN-CENELEC report for the first two quarters of 2025, the rate of harmonisation of Georgian standards with European standards is 87.62%). GEOSTM represents Georgia in ISO and IEC and operates in two main areas — standardisation and metrology — including internationally recognised calibration and measurement services. Through its internationally recognised laboratories, GEOSTM provides calibration and measurement services equivalent to those conducted by European metrology institutions.

On gender mainstreaming, GEOSTM has emerged as the regional leader among Georgian QI institutions. It signed the UNECE Declaration on Gender-Responsive Standards and Standards Development on 21 February 2020 and developed its first formal Gender Action Plan for 2025–2027 with UNECE support, appointing a designated Gender Focal Point. The Action Plan covers two main areas — standardisation and metrology — and aims to strengthen gender-responsive approaches within the agency's activities. Key priorities include assessing opportunities for gender-sensitive review of standards, promoting more balanced participation of women and men in technical committees, reviewing internal procedures from a gender perspective, and raising awareness among staff and relevant stakeholders.

As part of this process, GEOSTM is exploring international methodologies and practices for integrating gender considerations into standards development, including approaches applied by ISO and relevant UN organisations. While the agency primarily adopts international and European standards rather than independently modifying them, it is assessing opportunities for applying gender-responsive approaches within national standardisation processes and internal practices. The Action Plan also includes initiatives related to knowledge sharing, capacity building, and strengthening institutional understanding of gender equality principles across GEOSTM's areas of work.

8.3 GEORGIAN ACCREDITATION CENTER (GAC)

The Unified National Body of Accreditation – Georgian Accreditation Center, founded in November 2005, is the sole national accreditation body and accredits conformity assessment bodies to international standards (ISO/IEC 17025, ISO/IEC 17020, ISO/IEC 17065, ISO 15189, ISO/IEC 17021). By 2025, it had accredited 285 bodies. GAC is an A-category member of the EA and a full member and signatory to the MLA of Global ACI. GAC has developed a Gender Action Plan with UNECE support, covering the period up to 2028. The plan was developed following dedicated training and expert support. It aims to ensure that accreditation and conformity assessment services are inclusive, fair and representative, while promoting equal opportunities for women and men.

The plan includes several priority areas:

- The review of internal employment, promotion and workplace conduct policies;
- The establishment of institutional mechanisms through the appointment of a designated gender coordinator responsible for coordinating gender-related activities and liaising with UNECE;
- The development of sex-disaggregated data collection and reporting mechanisms on the composition of staff, assessors and decision-makers;
- Awareness-raising activities and training on gender perspectives for GAC personnel, with the possibility of extending such activities to representatives of conformity assessment bodies.

GAC currently employs approximately 27–30 staff members. One third of staff members are professional evaluators, and their assessment activities are supported by an external expert pool comprising specialists from various sectors. The Gender Action Plan represents a voluntary initiative developed beyond the requirements of ISO/IEC 17011 and Regulation (EC) No 765/2008, as these frameworks do not contain specific gender-related requirements for accreditation bodies. While the appointment of a gender coordinator has already been implemented, other measures, including the establishment of systematic sex-disaggregated data collection and reporting, are planned for further implementation.

8.4 MARKET SURVEILLANCE AGENCY (MSA)

Established in May 2020, the MSA oversees goods placed on the market under the Product Safety and Free Movement Code and relevant technical regulations. Its mandate covers construction

products, PPE, machinery, gas appliances and other product groups.[32] Market surveillance for lifts, cableways and pressure equipment lies with the TCSA rather than with MSA; TCSA is designated as the market surveillance body for these product groups and additionally supervises facilities of increased technical risk in operation (see 5.2).

The table below sets out those product groups within MSA's remit that are relevant to the construction materials manufacturing sector, with the reference EU instruments and their Georgian equivalents. It is a selection made for the purposes of this study rather than a statement of the Agency's surveillance priorities, which extend to further product groups — including toys, electrical equipment and other consumer goods — outside the scope of this analysis.

Table 1. Product groups within MSA's remit relevant to the construction materials manufacturing sector, with reference EU and Georgian regulatory instruments.

Product group (selected)	Construction-Materials Products	Reference EU Regulation	Relevant Georgian Regulation
Construction products	Cement, aggregates, reinforcing steel and other construction products within the regulation's scope	Regulation (EU) No 305/2011, replaced by Regulation (EU) 2024/3110	"On approval of technical regulations on construction products" by Decree No. 476 of 1 October 2018
PPE	Hard hats, harnesses, boots, gloves, respirators, hi-vis	Regulation (EU) 2016/425	"Regarding the approval of the technical regulation on personal protective equipment" by Decree No. 82 of 6 February 2020
Machinery & equipment	Concrete mixers, batching and crushing plant	Directive 2006/42/EC, replaced by Regulation (EU) 2023/1230 from January 2027	"On approval of technical regulations on machinery and equipment" by Decree No. 85 of 6 February 2020
Gas appliances	Industrial heating and cooling systems	Regulation (EU) 2016/426	"Technical Regulations on Gas-Fired Devices" approved by Decree No. 84 of 6 February 2020

Desk research did not identify published gender-disaggregated data on MSA inspections, or an explicit gender-sensitive surveillance protocol. As the Agency declined to participate in an interview (Section 4), this finding rests on published sources alone. From a gender perspective,

[32] It must be noted that the MSA's mandate goes beyond these products and includes products such as toys, lighters, radio equipment, electric appliances, etc.

MSA's role in overseeing the PPE market is critical, as EU harmonised EN standards have historically been based largely on male physiological data.

8.5 LABOUR INSPECTION SERVICE (LIS)

The LIS is the central enforcement body for labour rights and OSH. After a complete absence from 2006 to 2015 following the Rose Revolution's deregulation drive, the inspectorate was re-established with a limited advisory mandate. The 2018 Organic Law on Occupational Safety and the 2020 Labour Code reform transformed the LIS into a full-fledged enforcement agency with powers to conduct unannounced inspections, issue binding instructions and administrative sanctions, and monitor compliance with anti-discrimination provisions. According to the LIS's 2025 report, 2,045 inspections were conducted on OSH compliance and 1,664 on labour rights.

The LIS is legally required to maintain gender balance among its inspectors and to consider gender when appointing staff. However, the LIS does not currently publish sex-disaggregated data on inspections, identified violations, occupational injuries, or enterprise-level workforce composition; this remains a key institutional reform priority.

8.6 CROSS-CUTTING INSTITUTIONAL FINDING

Gender mainstreaming across Georgia's QI sub-system remains uneven and is not yet systematically linked to the broader national gender-equality coordination mechanisms. While GEOSTM and GAC have developed Gender Action Plans with international support, gender mainstreaming approaches have not yet been consistently institutionalised across all QI institutions. Document review and stakeholder interviews did not identify a formal cross-agency channel through which the Inter-Agency Commission on Gender Equality systematically engages with GAC, MSA, and the LIS. Similarly, a formal Gender Focal Point Network across Georgia's QI institutions has not been identified. Further efforts are needed to strengthen coordination, establish common gender mainstreaming mechanisms, and promote the exchange of practices across QI institutions.

9. INTERNATIONAL STANDARDS, EUROPEAN PRACTICE, AND COMPARATIVE GOOD PRACTICES

International good practice is converging on a clear proposition: OSH standards are not gender-responsive if they assume a 'neutral worker.' The most authoritative formal definition in current standardisation practice comes from joint guidance developed by ISO and IEC, produced in response to the UNECE Declaration on Gender-Responsive Standards and Standards Development, which both organisations signed in May 2019. ISO and IEC established a Joint Strategic Advisory Group on Gender-Responsive Standards (JSAG GRS), which developed guidance for technical committees. In that framework, a gender-responsive standard is one that specifically considers gender implications in its content, requirements, and application, recognising physical and physiological differences between sexes so that women and men benefit equally from any given product, process, system, or service.

Applied to OSH, standards which calibrate exposure limits, protective equipment design, or risk assessments against a default male body, male physiology, or male patterns of work will systematically fail to protect women workers. Good practice requires that risk assessment, equipment design, training, supervision, exposure control, reporting, and worker participation all account for sex-disaggregated evidence, anthropometric diversity, reproductive and maternity-related risks, task segregation inside the same job title, and gendered exposure to violence, harassment, and psychosocial load. Guidance from the European Agency for Safety and Health at Work (EU-OSHA), the ILO, and the WHO aligns on these points, even where the underlying legal instruments are written in gender-neutral terms[33].

9.1 GLOBAL STANDARDS ARCHITECTURE

The UNECE Gender-Responsive Standards Initiative, launched in 2016 by the UNECE Working Party on Regulatory Cooperation and Standardization Policies (WP.6), produced Recommendation U on Gender-Responsive Standards (2018), which contains the Declaration on Gender-Responsive Standards and Standards Development. The Declaration was opened for signature in Geneva on 14 May 2019 and had 86 signatory organisations by December 2024. GEOSTM signed on 21 February 2020, and in November 2023 Davit Tkemaladze of Georgia was elected as vice-chair of the WP.6 Bureau. Signatories commit to creating and implementing gender action plans, supporting gender-balanced standards-development processes, and tracking progress through sex-disaggregated data[34].

ISO 53800:2024 — Guidelines for the Promotion and Implementation of Gender Equality and Women's Empowerment — applies to all organisations regardless of size or sector. The ISO/IEC JSAG GRS has developed guidance for technical committees on assessing potential gender implications of standards, supported by six case studies. Approximately 22% of standards-development experts globally are women, with 50+ ISO standards directly supporting Sustainable Development Goal (SDG) 5.

The CEN-CENELEC Gender Action Plan 2023–2025/2026 sets out three pillars: awareness-raising and capacity-building; tools and recommendations for technical experts; and review of policies and regulations. In October 2025, CEN-CENELEC's Board approved the creation of a new Advisory Committee on Diversity and Inclusion. The 2024 brochure How to Be Gender-Responsive in Standardization offers a practical guide for European technical experts[35].

[33] EU-OSHA, 'New Risks and Trends in the Safety and Health of Women at Work' (2021 update); ILO, 'Occupational Safety and Health and Gender' (2019 guidance); WHO guidance on sex/gender distinctions in occupational risk.

[34] UNECE WP.6, Recommendation on Gender-Responsive Standards (ECE/TRADE/C/WP.6/2018/9, 2018).

[35] CEN-CENELEC, Gender Action Plan 2023–2025/2026 (adopted 2023); CEN-CENELEC, 'How to Be Gender-Responsive in Standardization' (2024 brochure); CEN-CENELEC Board Decision on Advisory Committee on Diversity and Inclusion (October 2025).

9.2 EUROPEAN LEGAL ARCHITECTURE

European hard law already provides much of the legal architecture needed to implement gender-responsive OSH in construction materials manufacturing and other high-risk sectors. The core duties are found in the EU Framework Directive on OSH (Directive 89/391/EEC), the Temporary and Mobile Construction Sites Directive, the Workplace PPE Directive, and the Pregnant Workers Directive. The EU Gender Equality Strategy 2020–2025 and the EU Strategic Framework on Health and Safety at Work 2021–2027 are mutually reinforcing, with the OSH Strategic Framework affirming that 'measures must be gender aware' and tailored to all workers. Key technical instruments include the Construction Products Regulation (EU) 2024/3110; the Machinery Regulation (EU) 2023/1230 with modernised ergonomic provisions; and the Carcinogens, Mutagens and Reprotoxic Substances Directive, including the 2022 amendment to introduce reprotoxic substances. What is usually missing across EU member states is not a complete absence of law, but the operational translation of these duties into gender-responsive procurement specifications, fit testing, sex-disaggregated indicators, participatory risk assessment, and monitoring systems.

The EBRD's Strategy for the Promotion of Gender Equality 2021–2025 targeted the integration of gender-equality components into 40% of EBRD operations by end-2025. Through the Bank of Georgia, the EBRD's Women in Business Programme has reached over 200 women entrepreneurs in Georgia, and EBRD-financed industrial projects provide a direct entry point for gender-conditional financing in the construction materials manufacturing sector.

9.3 EUROPEAN COUNTRY EXAMPLES

From the OSH perspective the best European examples are concentrated not in a single binding 'gender OSH standard,' but in implementation tools and institutional reforms. Italy's principal OSH legislation (Legislative Decree 81/2008) requires risk assessment to account for gender differences, and in July 2024 the Italian National Institute for Insurance against Accidents at Work (INAIL) published an operational guide, the first volume of a planned series, containing 13 risk sheets covering ergonomic and chemical risks, harassment, violence, and night work[36]. France requires companies with at least 50 employees to publish an annual gender equality index covering pay gaps and promotion rates, though this applies to equality in the broad employment sense rather than specifically to OSH indicators. The United Kingdom's Health and Safety Executive (HSE) guidance requires employers to select PPE that suits the individual worker, accounting for size, fit, and physical characteristics, and explicitly states that modifying PPE to achieve fit is not an acceptable solution. Sweden's work-organisation tradition addresses gendered exposures through job design and organisational approaches, and Switzerland has developed structured tools for treating sexual harassment as a safety-and-health issue.

Explicitly gender-named technical standards remain uncommon in heavy industry, but standards bodies are increasingly creating tools and governance mechanisms that make gender

[36] Italy: INAIL, 'La Salute e la Sicurezza sul Lavoro in una Prospettiva di Genere' (Vol. 1, July 2024). France: Law No. 2018-771 of 5 September 2018 (gender equality index obligation, companies with 50+ employees). United Kingdom: HSE, 'Personal Protective Equipment at Work' (revised guidance, 2022).

responsiveness operational. ISO/IEC has guidance and assessment forms; ISO's case-study portfolio includes six practical examples of how gender-responsive considerations have been integrated into different standards; and European PPE standardisation has created a dedicated inclusiveness working group within the new CEN-CLC/JTC 23. The practical frontier is shifting from abstract equality statements to product design, testing methods, and committee procedures.

9.4 COMPARATIVE NATIONAL EXPERIENCES RELEVANT TO GEORGIA

Among EU candidate and accession peers, Serbia's Institute for Standardization signed the UNECE Declaration on 1 February 2023 and has adopted a Gender Action Plan 2023–2030 specifically targeting representation in technical committees and cooperation with women's professional associations[37]. Ukraine's DSTU has signed the UNECE Declaration despite the war. Germany's Federal Institute for Occupational Safety and Health (BAuA) produces extensive research on gender and OSH and represents a natural twinning partner for Georgia's LIS. These experiences confirm that the most tractable entry points are not legislative overhaul but targeted institutional commitments: gender focal points, sex-disaggregated data requirements, inclusive PPE procurement rules, and gender assessment forms embedded in the standards development cycle — all steps that GEOSTM's 2025–2027 Gender Action Plan has begun to take.

9.5 PRINCIPLES OF GENDER-RESPONSIVE OCCUPATIONAL SAFETY

Six principles define good practice.

- **Reject the neutral-worker assumption.** Risk assessment must reflect work as actually performed. Differences in outcomes between women and men often reflect how work is organised and allocated, not biology alone.
- **Use sex-disaggregated, task-level evidence.** Workers sharing a job title frequently perform different tasks and face different exposures. Men tend to face higher rates of acute injuries; women higher rates of musculoskeletal disorders from repetitive work. Sex-disaggregated reporting is a precondition for addressing these differences.
- **Ensure PPE and equipment actually fit.** Certified equipment that does not fit provides inadequate protection. CEN-CLC/JTC 23 has established a dedicated Inclusive PPE working group with ergonomics, compatibility, and inclusiveness as explicit priorities.
- **Apply life-course protection without exclusionary assumptions.** EU law requires risk assessment for pregnant workers and new mothers, but gender-responsive practice extends to menstruation, menopause, fertility, night work, and sex-linked responses to chemicals. Gender risk assessment must not be reduced to maternity protection alone.
- **Treat violence, harassment, and psychosocial hazards as core OSH matters.** ILO Convention No. 190 establishes the right to a world of work free from violence and harassment. This is especially relevant in sectors with isolated work, power imbalances, or subcontracting chains.

[37] Serbia: Institute for Standardization of Serbia, Gender Action Plan 2023–2030 (signed UNECE Declaration 1 February 2023). Germany: BAuA, gender and OSH research programme (2023 overview). Ukraine: DSTU UNECE Declaration signatory status confirmed 2022.

- **Ensure meaningful worker participation.** OSH systems perform best where workers and safety representatives can surface hidden exposures and challenge procurement or design assumptions.

10. FINDINGS FROM GEORGIA'S CONSTRUCTION MATERIALS MANUFACTURING SECTOR: EVIDENCE BASE AND IDENTIFIED GAPS

The baseline, legal, institutional and policy analysis, together with KIIs with producers, testing laboratories and an OSH specialist, converges on a consistent picture: occupational segregation is near-total in production and field roles, formal OSH systems are largely sex-neutral by design, and gender-specific risks such as reproductive health, PPE fit, sanitary infrastructure, harassment, maternity protection, and psychosocial strain are acknowledged but rarely assessed or managed systematically.

10.1 REPRODUCTIVE-HEALTH RISKS

Cement and clinker dust contain crystalline silica and trace heavy metals — cadmium, chromium VI, nickel, lead, arsenic — that are recognised carcinogens or reproductive toxicants, carrying particular risks for women of reproductive age (reduced fertility, miscarriage, low birth weight, developmental effects). Article 22 of the 2020 Labour Code explicitly prohibits requiring pregnant women to perform work endangering the foetus, but this legal protection is not matched by practice: **no producer or laboratory interviewed conducts proactive reproductive-health risk assessment.** Where the issue arose at all, it was addressed as an informal judgement rather than a documented procedure — one metal-constructions producer noted that welding fumes and heavy metals are hazardous for everyone and that during pregnancy "it is better to abstain," without any formal assessment behind that view. This pattern held across all interviewed producers and laboratories: companies report that they currently have no pregnant or breastfeeding employees in production roles, and would apply the legal minimum (e.g., night-shift restrictions) reactively if such a case arose, rather than assessing reproductive risk proactively for women already in or near hazardous processes.

The absence of proactive reproductive-health risk assessment is not a gap in legal text but a gap in implementation: a pattern that recurs across every risk area below and points toward the OSH specialist's broader enforcement diagnosis (Section 10.7).

10.2 PPE AND ANTHROPOMETRY

International evidence from the US Center for Construction Research and Training (CPWR) finds that 74% of tradeswomen are exposed to unnecessary hazards due to poorly fitting PPE, and women's average grip strength (~66% of men's) means male-standard tools impose disproportionate musculoskeletal risk. Georgian OSH rules nominally require PPE to be suited to the individual worker's physiological needs. In practice, however, procurement is organised around a standard-issue reference user, which is the neutral-worker assumption in operational form. Producers and laboratories offered a largely consistent account:

- **Producers** reported no cases where PPE sizing was a documented challenge. The main reason for this is that women are practically not employed in production or field-based positions. However, even in such cases, they do not expect such a problem to arise. Respirators, protective clothing, and footwear are described as available in a range of sizes; several respondents noted that custom tailoring is readily available on request.
- **Laboratories** likewise did not identify any difficulties related to PPE sizing. In one isolated case, a concern regarding the inconvenient size of gloves was mentioned; however, this issue was easily resolved by purchasing suitable gloves from a pharmacy.
- **Across both groups**, respondents acknowledged that poorly fitted PPE is itself a safety hazard and a legal violation ("an oversized glove, a loose respirator, heavy footwear... becomes a source of danger").

The **OSH specialist** confirmed this from the regulatory side: one-size-fits-all approaches are already incompatible with existing requirements, and labour inspectors do encounter cases of mass-procured equipment proving unsuitable for individual users. However, no such case was identified specifically in the construction materials manufacturing sector.

The legal and normative framework already requires individualised PPE fit; the gap is that this requirement is currently untested at scale, because so few women occupy roles where it would be triggered. This makes PPE less a "current problem" in respondents' framing and more a latent risk that would surface if occupational segregation eased.

10.3 SANITARY AND INFRASTRUCTURE BARRIERS

EU-OSHA, ILO, and EBRD-financed gender audits have repeatedly documented structural barriers in heavy industry — absence of separate sanitary facilities, changing rooms, lactation rooms, and rest areas. No systematic survey of this exists for Georgia, but KII evidence gives partial confirmation: larger producers cite and apply Labour Code provisions, including separate sanitary and changing facilities, in some cases retained from an earlier period when women worked in production. One field-oriented laboratory, by contrast, maintains showers and sanitary facilities for men only, on the stated grounds that women have no field role there (illustrating how infrastructure gaps and occupational segregation reinforce each other rather than being independent problems). Infrastructure provision appears to track current female presence in a role rather than anticipating it, meaning facilities gaps could act as a further barrier to entry, not just a consequence of absence.

10.4 SEXUAL HARASSMENT AND GENDER-BASED VIOLENCE

Georgia's first National Study on Violence against Women (UN Women–Geostat, 2017–2018) found that one in five women had experienced sexual harassment in their lifetime, with 30% of incidents occurring in workplaces; the Public Defender's Office identifies workplace sexual harassment as widespread and under-reported, frequently involving a supervisor. International sectoral evidence puts the figure at 30% of women in construction trades reporting frequent harassment.

Against this backdrop, both producers and laboratories described a consistent gap between formal mechanisms and practical experience:

- Formal mechanisms exist unevenly: disciplinary committees, internal regulations referencing harassment, anonymous complaint boxes and human resources (HR) reporting channels. However, no interviewed producer or laboratory reported a specific harassment case, or practical experience of applying these mechanisms. Women's concentration in office-based roles appears to reduce perceived exposure.
- Where mechanisms exist, they are typically general-purpose disciplinary tools (also covering alcohol use, smoking, other misconduct) rather than harassment-specific procedures.

The mechanisms that exist are formal but untested, which makes it difficult to assess whether they would function if a case arose. This is consistent across sub-sectors and suggests the gap is structural (lack of a tested reporting/response pathway) rather than sector- or company-specific.

10.5 MATERNITY PROTECTION AND RETURN TO WORK

The 2020 Labour Code reform improved parental leave and protected the right to return to the same position, but the maternity-leave benefit cap (2,000 GEL since 1 January 2023) and coverage gaps for atypical workers leave Georgian maternity protection short of international standards. KII evidence adds little independent confirmation here, largely because interviewed companies report currently having no pregnant or breastfeeding employees in production roles. Respondents describe an intention to follow legal requirements reactively (e.g., night-shift restrictions) rather than describe actual return-to-work experience. This absence of lived cases is itself informative: it means the maternity-protection framework in this sector is essentially untested in practice, paralleling the PPE and reproductive-health findings above.

10.6 MENTAL HEALTH AND PSYCHOSOCIAL RISKS

Long shift work, isolation at remote quarry locations, harassment risk, unpaid-care burden, and the income gap together create a psychosocial-risk profile for women in the sector that is not captured in any Georgian survey instrument, and did not surface as a distinct theme in KIIs. It is consistent with the broader finding that gender-differentiated risk is not currently a category that companies track or assess (see 10.7).

10.7 CROSS-CUTTING PATTERNS ACROSS RISK AREAS

Several patterns recur across all six risk areas and across both producers and laboratories:

Occupational segregation is treated as pre-existing, not as a company decision. Across producers and laboratories alike, respondents attributed women's absence from production and field roles to a lack of applicants ("no CV from a woman has ever come in") rather than a formal restriction, while explaining the pattern through a uniformly physical framing (mainly heavy lifting).

Counter-examples exist but are exceptions, not evidence of systemic change. Women crane operators, a former production-unit head, a 14-year laboratory sampler who worked through three pregnancies, and a 40-year veteran laboratory head all directly contradicted the physical-capacity framing from lived experience, but their presence has not translated into broader recruitment or role changes.

Risk assessment is sex-neutral by design, not by oversight. Where formal risk assessment exists, it explicitly does not disaggregate by sex; no producer or laboratory maintains sex-disaggregated injury or incident data, even in the most sophisticated key performance indicator (KPI) and health, safety and environment systems encountered. However, in this case as well, the main explanation should be sought in the fact that women's employment in production and field-based positions remains very limited.

Standards contain no gender element. No respondent recalled any gender-related requirements in the product and test standards applied (EN 196, EN 197, EN 206, residual Soviet-era State Standard (GOST) methods).

The laboratory sector expert explicitly challenged the physical-capacity explanation for occupational segregation, attributing it instead to mentality, workplace relationships and organisational culture, while arguing that a functioning general OSH system should be established before gender-specific dimensions are addressed. That sequencing argument merits a direct response. On the ISO/IEC and EU-OSHA framing set out in Section 9, gender-responsiveness is a property of a functioning OSH system rather than a module added once it is built; deferring it risks embedding the neutral-worker assumption in the very systems now being established, at which point correcting it becomes considerably more expensive.

The OSH specialist located Georgia's main OSH weakness not in legislation (which he judged broadly comparable to Western frameworks) but in implementation. This framing applies equally to the gender-specific gaps identified above: the Labour Code, PPE fit requirements, and reporting mechanisms mostly already exist on paper; the recurring finding is that they are not proactively applied, tested, or monitored in relation to women workers specifically.

At the same time, demand for support is practical, not normative: producers did not identify gender mainstreaming as a felt necessity, but did identify concrete needs: methodological guides from the LIS or donors, training materials based on real cases, informational materials for workers, peer-exchange workshops, and affordable advisory services.

The research also found that no domestic capacity exists for gender-responsive PPE testing. No respondent, including the GAC representative, could identify a Georgian laboratory accredited to test PPE at all, meaning Georgia currently has neither the testing infrastructure nor client demand signals to support the CEN-CLC/JTC 23 inclusive-PPE agenda discussed earlier in this report.

11. CONCLUSIONS AND RECOMMENDATIONS

The analysis of Georgia's construction materials manufacturing sector suggests several areas where the current alignment between legal frameworks and workplace practices could be further explored to enhance gender-responsive outcomes.

- **Trends in Workforce Distribution:** Observations indicate a continuing pattern of **occupational segregation**, with women representing a **limited proportion of the workforce** and primarily occupying administrative, laboratory, and quality-management roles. This distribution appears to be influenced by long-standing perceptions regarding

the physical requirements of production roles and a lack of female applicants for field-based positions.

- **Approaches to Workplace Safety:** Current OSH practices in the sector generally follow a **sex-neutral approach**, where hazards are assessed as applying equally to all staff. Equal treatment in the assessment does not, however, deliver equal protection. On the framing adopted in Section 9, hazards evaluated against an implicitly average male worker leave sex-specific factors — reproductive-health exposure, anthropometric and ergonomic difference — outside the assessment altogether, and no interviewed producer or laboratory maintains sex-disaggregated incident data that would reveal the omission.
- **Observations on Protective Equipment:** While PPE is consistently provided, procurement typically focuses on **unisex equipment**. Stakeholders regard this as sufficient for current needs, largely because women are almost absent from the roles in which fit problems would surface. The individual-fit duty that already exists in Georgian law is therefore untested rather than satisfied, and documented fit-testing would strengthen protection for all workers while removing a latent barrier to women entering production roles.
- **Opportunities for Data Enhancement:** There appears to be a **lack of systematic sex-disaggregated data** across the sector's institutions and private enterprises. This produces a circularity that runs through the brief: 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. Closing the data gap is therefore a precondition for gender-responsive policy in this sector, not an adjunct to it.
- **Institutional Progress:** Successes in gender-mainstreaming at institutions like **GEOSTM and GAC** suggest that voluntary action plans can serve as useful models. There is potential for these practices to be shared more widely across the broader QI system.

These conclusions from the desk research and KIIs allow us to form the following main recommendations for state institutions and private companies:

Public Institutions:

1. **Establish a Cross-Agency Network:** create a voluntary **Gender Focal Point network** linking GEOSTM, GAC, the MSA and the LIS, to share practice and to work through how gender-responsive standards apply to each institutional mandate. GEOSTM and GAC, which already have action plans and designated focal points, are the natural conveners.
2. **Introduce Sex-Disaggregated Reporting:** the LIS should disaggregate inspection findings, identified violations and occupational injuries **by sex**, and Geostat should publish a sex-disaggregated indicator set for the subsector. A dedicated sectoral survey of OSH conditions and protective equipment use, reporting results by sex, would establish the baseline that no existing instrument currently provides (Section 6.4).
3. **Advance International Alignment:** continue assessing national labour and safety frameworks against international benchmarks, and specifically against **ILO Conventions Nos. 190, 183, 156 and 81** — on violence and harassment, maternity protection, workers with family responsibilities, and labour inspection respectively. All four remain unratified,

and each has been recommended by the CEDAW Committee, the Public Defender or the 2024 Enlargement Report.

4. **Use the Public Procurement Window:** the principal provisions of the Law on Public Procurement take effect on 1 January 2030, with certain provisions applying from 1 January 2032, and the secondary legislation establishing rules, thresholds and priority product lists will need to be adopted ahead of that date. Because sectoral demand depends heavily on publicly and donor-financed construction, this is the single strongest mechanism available — and the drafting of that secondary legislation is the point at which it can be used. Gender-relevant award criteria and contract-performance clauses — documented protective-equipment fit, sanitary and changing provision, a harassment procedure, and sex-disaggregated workforce reporting — should be specified for construction materials and works contracts while the window remains open (Section 5.3).
5. **Close the PPE Testing Capacity Gap:** no Georgian laboratory could be identified as accredited to test PPE at all, so neither the individual-fit duty in Georgian law nor the CEN-CLC/JTC 23 inclusive-PPE agenda can currently be verified domestically. GAC, GEOSTM and donor projects should jointly **scope the establishment of accredited PPE testing and fit-testing capacity**, including whether demand justifies national capacity or regional cooperation is the more proportionate route (Section 10.7).

Private Sector:

1. **Address Gender-Specific Risk Factors:** enterprises should **review risk assessments periodically** so that they account for reproductive-health exposure, ergonomic and anthropometric difference, and psychosocial risk — and should do so before, rather than after, women enter the roles concerned.
2. **Formalise Feedback Channels:** informal communication is not a substitute for a documented procedure. Companies should establish **harassment-specific reporting mechanisms**, distinct from general disciplinary tools, so that every employee has a clear and confidential route for raising concerns. Because these mechanisms are currently untested, they should be actively communicated and rehearsed rather than left to be tested by a first case.
3. **Adopt Individual-Centred PPE Procurement:** shifting toward procurement practices that emphasise **individual fit, ergonomics and employee requests** (rather than a one-size-fits-all model) could potentially improve both safety compliance and worker comfort. In addition, this approach can benefit the companies through increased productivity due to higher levels of comfort at work.

In addition to the recommendations highlighted above, it is important to enhance collaboration between private and public sectors. This is particularly relevant for ensuring a higher level of OSH compliance by the private sector, as well as encouraging self-regulation on gender aspects. Firms and the public sector are particularly encouraged to seek out **methodological guides and peer-exchange opportunities** provided by state bodies or international donors. This can potentially enhance adoption of gender-responsive principles into practical workplace environments.

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