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16th June 2020

**The Chief Director
Ministry of Sanitation and Water Resources
Accra**

Dear Sir/Madam,

DECOMMISSIONING AND REENGINEERING OF KPONE LANDFILL SITE

With reference to the recent communication from the Ministry of Sanitation and Water Resources about the decommissioning and reengineering of the Kpone Landfill site, we write to bring to your attention the concerns of informal waste pickers working at the landfill site. Women in Informal Employment: Globalizing and Organizing (WIEGO) is a global research-policy-action network that seeks to improve the status of the working poor, especially women, in the informal economy. As part of its activities in Ghana, WIEGO is supporting the near 500 waste pickers who are members of the Kpone Waste Pickers Association to promote safer working conditions, enhance their social and economic circumstances, and improve the livelihoods of waste pickers and their families.

Whereas we recognise the rights of government over the landfill site and planned project, we are of the considered opinion that the inclusion of representatives of waste pickers as a key stakeholder in the consultative process is essential. Regrettably, the waste pickers were neither consulted nor engaged in any deliberations thereof. Secondly, about 500 women and men waste pickers currently work at the Kpone waste dump site from where they and their families depend for their livelihoods. Proceeding with the project without providing alternative livelihood opportunities for waste pickers will push them further down the poverty line and worsen their already dire social and economic circumstances.

We have reason to believe that this project is proceeding without the required Environmental and Social Impact Assessment according to the requirements in the Environmental Assessment Regulations 1999. Projects relating to the establishment of landfills – including for the closure of landfills – require a complete environmental impact statement,¹ with public notification and the opportunity for comment by all affected persons. In the absence of the Environmental and Social Impact Assessment, the rights of waste pickers to have their concerns heard and to learn about the project proponents' plans for mitigating the devastating social and economic impacts of the project to our lives and livelihoods were denied.

¹ See Environmental Assessment Regulations 1999 § 3 & Schedule 2(15)(a)(iv) & (b)(iv).

Consequently, we would like to bring the following concerns to your attention for redress:

1. That about 500 women and men informal waste pickers are working at the Kpone dump site and well organised as a function association. Through the activities of waste pickers, a large volume of recyclable materials brought to the dump site are recovered and thus increasing the lifespan of the site and savings for government. Based on the importance of their activities, waste pickers should be consulted and engaged as a key stakeholder in all matters with implications for their activities and livelihoods.
2. The Kpone waste dump site is the main source of incomes and livelihood for the waste pickers and their families. Our legitimate interest in the land arises from our longstanding usage of the site and the repeated promise that we would be allowed to use and return to the site. If the landfill is closed without addressing the impact on our livelihoods, we will be displaced both physically and economically, devastating our families and producing a real loss for Accra's ability to handle and process solid waste.
3. In proceeding with the project, government and project partners should provide alternative livelihood opportunities for waste pickers who will be affected. The opportunities may include trainings on appropriate skills and the integration of waste pickers into municipal solid waste management systems and provided with requisite training and logistics.
4. We recommend that plans to construct any landfill site in future should take into account the activities of informal waste pickers and adequate provisions made for them to undertake their activities including sorting spaces, roads, and washrooms.

We trust these concerns will reach your highest consideration.

Please, do not hesitate to contact Karim Saagbul on **0243314406** or email karim.saagbul@wiego.org should you require any clarifications or further information.

We count on your cooperation

Yours sincerely

Dorcas Ansah
Accra Focal Cities Coordinator, WIEGO