



AIKMM

All India Kabadi Mazdoor Mahasangh

ऑल इंडिया कबाडी मजदूर माहासंघ

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SAFP

Sathi All For Partnership

Advocacy for waste workers

Initial Response of Informal Waste Workers to Municipal Solid Waste Management Manual DRAFT 2014

To:

**Dr. Ramakant, MoUD
and Mr. Ramesh Nair, GIZ**
Maulana Azad Rd, Rajpath
Road Area, Central Secretariat
New Delhi – 110 001

From:

Shashi Bhushan
Program coordinator SAFP and All
India Kabadi Mazdoor Mahasangh
(AIKMM)
E9 Anand Lok Mayur Vihar, Phase-I
New Delhi – 110 091

Dear Sirs,

The All India Kabadi Mazdoor Mahasangh (AIKMM) has received the draft of the new Solid Waste Management Manual from the Ministry of Urban Development (MoUD), and we write this letter to express our initial response. We are pleased that waste management—and in particular, the important roles that informal waste workers play in municipal solid waste management—is receiving needed attention from India’s central ministries.

However, we are supremely disappointed in the process by which this manual has been drafted. First, the draft available online provides no transparent explanation of the process by which public comments may be submitted and considered for the required minimum of 60 days. Second, we were offended to not have received any invitation from the MoUD to participate in the “National Stakeholders Workshop” on 24-25th July, 2014 even though our members are among the most important stakeholders in the issues covered by this manual. And third, we ask that you



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acknowledge it was entirely inappropriate that AIKMM (and other stakeholders connected to the vast informal waste management economy in India) was excluded entirely from this manual's drafting process, and that rather than play an integral role we have been asked merely to submit recommended revisions to a document that is all but complete.

Indeed, the concept of “stakeholders” in the 2014 DRAFT Manual is fundamentally flawed. Your letter dated 7th July 2014 suggests that the stakeholders for this manual are “Ministries/Departments/State Govts./ULBs/International organizations.” Although these may be some of the most prominent *consumers* of your Manual, they are not your *stakeholders*. Under the Constitution of India the stakeholders are the citizens of India. They—not municipalities, and certainly not GIZ—are the ones who must be duly considered and included in the drafting of such documents. We will be submitting a second letter (titled “Preliminary Comments from Informal Waste Workers Regarding Municipal Solid Waste Management DRAFT 2014”) that offers some preliminary comments to the DRAFT Manual, and we certainly hope to have more opportunities to provide input in the future. Unfortunately, for now, the accuracy of this manual's contents is poor and its legitimacy jeopardized due to the exclusion of key stakeholders from its drafting, as our preliminary comments will explain in greater detail.

Ultimately, this is a question of democracy and citizenship. Should the Government of India be held responsible to its citizens, or to GIZ, an entity owned by the Federal Government of Germany? The response of the MoUD to this question to date has been supremely disappointing, and we hope that together we might move forward to find more creative, inclusive alternatives. We look forward to working with you accordingly.

Sincerely yours,

Shashi Bhushan
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Preliminary Comments from Informal Waste Workers Regarding Municipal Solid Waste Management Manual DRAFT 2014

To:

Dr. Ramakant, MoUD
& **Mr. Ramesh Nair**, GIZ
Maulana Azad Rd, Rajpath
Road Area, Central Secretariat
New Delhi – 110 001

From:

Shashi Bhushan
All India Kabadi Mazdoor Mahasangh
(AIKMM)
No. 260, Pocket-E, Mayur Vihar,
Phase-II
New Delhi – 110 091

Dear Sirs,

The All India Kabadi Mazdoor Mahasangh (AIKMM) has received the draft of the new Solid Waste Management Manual from the Ministry of Urban Development (MoUD), and we write this letter to offer some preliminary comments. Firstly, we commend your office for releasing a drafted manual that acknowledges the informal economy and the important roles it plays in reducing costs, helping the environment, generating livelihoods, and bringing valuable expertise to the table with regard to municipal solid waste management. Likewise we were pleased to note an emphasis on decentralized waste management, segregation at the source, and integration of the informal economy in your draft. Compared to the 2000 Manual this is a much more enlightened document.

However, we fundamentally disagree with the approach your ministry has taken to the inclusion of key stakeholders in the drafting of this document. We encourage you to refer to our first letter (titled “Initial Response of Informal Waste Workers to Municipal Solid Waste Management Manual DRAFT 2014”) for a more complete explanation of our grievances. It is offensive, inappropriate, and downright unconstitutional for AIKMM to have been entirely excluded from the drafting process of this document, as we have been asked only to submit recommended revisions to a draft that is all but complete. This approach reveals that MoUD has valued the inputs and priorities of internationally owned enterprises over the needs of its citizens thus far.

In a hope to contribute some constructive suggestions to the drafting process of this Manual, however late, AIKMM submits two attachments. The first is a list of nine preliminary comments directed at particular sections of the DRAFT Manual. The



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second attachment (titled “Systemic Model for discussion”) offers a basic model for decentralized waste management that we hope might inform the MoUD Manual.

We look forward to working together in the future to address the fundamental problem of stakeholder exclusion from the MoUD drafting process in a way that meets the following demands of our organization:

1. Central legislation should be immediately enacted to mandate that state and local governments guarantee livelihoods, social security, space, and welfare services for waste collectors.
2. Waste collectors’ work should be officially recognized. Workers should be granted legal status, issued government IDs, and granted authorized access to waste.
3. In every neighborhood, waste collectors should be given space to sort waste and prepare compost.
4. The exclusive rights for door-to-door collection of waste from housing clusters and neighborhoods should be assigned to informal-sector waste workers. Private sector companies should be kept out of door-to-door waste collection.
5. States should establish provisions to manage recycling units at the community level, and sanitary landfills at the district level.
6. All current and proposed waste-to-energy incineration projects should be abandoned, and the rights of informal-sector workers to access waste should be restored, with immediate effect.

Thank you for your time and consideration.

Sincerely yours,

Shashi Bhushan
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