



AIKMM

All India Kabadi Mazdoor Mahasangh

ऑल इंडिया कबाडी मजदूर माहासंघ

www.aikmm.org

info-india@aikmm.org

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
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 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 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



AIKMM

All India Kabadi Mazdoor Mahasangh

ऑल इंडिया कबाडी मजदूर माहासंघ

www.aikmm.org

info-india@aikmm.org

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

General Secretary

All India Kabadi Mazdoor Mahasangh (AIKMM)

shashi.pandit@gmail.com

(+91) 9968413109



AIKMM

All India Kabadi Mazdoor Mahasangh

ऑल इंडिया कबाडी मजदूर माहासंघ

www.aikmm.org

info-india@aikmm.org

Preliminary Comments from Informal Waste Workers Regarding 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
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



AIKMM

All India Kabadi Mazdoor Mahasangh

ऑल इंडिया कबाडी मजदूर माहासंघ

www.aikmm.org

info-india@aikmm.org

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

General Secretary

All India Kabadi Mazdoor Mahasangh (AIKMM)

shashi.pandit@gmail.com

(+91) 9968413109



Comments on the Draft Municipal Solid Waste Management Manual (2014)

Central Public Health Environmental Engineering Office

Ministry of Urban Development, Government of India

Name of Commenter: **Shashi Bhushan**

Designation & Organization of Commenter **General Secretary, All India Kabadi Mazdoor
Mahasangh (AIKMM)**

Contact details: E-mail: **shashi.pandit@gmail.com**

Phone #: **(+91) 9968413109**

Address: **No. 260, Pocket-E, Mayur Vihar, Phase-II
New Delhi - 110 091**

Date of Commenting:

(For each comment please indicate the following)

Part of the Manual:

Part I

Part II

Section:

2.3

Sub-section:

N/A

Comment:

Step 3 of the 7-step process, "Stakeholder Consultation for MSWM Planning," is a very important one. Unfortunately for now it contains no specific or concrete suggestions for how stakeholders might be consulted. We are concerned that (a) this lack of specificity might lead some officials to overlook this important part of the process of preparing a MSWM plan, and (b) that it reveals a broader disregard for the importance of including stakeholders in planning processes in the MoUD's Manual. We hope that the next draft both includes and actively takes advantage of concrete mechanisms for ensuring stakeholder buy-in, such as reserving committee seats for stakeholders, inviting stakeholders to regular meetings and workshops, and so on.

(For each comment please indicate the following)

Part of the Manual:

Part I

Part II

Section:

2.11 Role of the Informal Sector

Sub-section:

N/A

Comment:

On page 28, while discussing the integration of the informal sector, the draft writes: “The integration process would typically RESULT IN the accrual of social benefits to waste pickers.” There is a similar comment on page 171 of Part II (“ONCE ORGANIZED, provision of social security and welfare benefits to waste pickers should also be considered”).

We are deeply concerned what this language implies for policy. Both comments suggest that first the informal sector must be integrated, and only then can informal workers be granted social security benefits. If followed, this principle would blatantly violate the Unorganised Workers’ Social Security Act of 2008 and also lead to poor policy that would haunt governments for years down the line. Instead, your manual should discuss how the causal link also needs to flow in the opposite direction: increased social security benefits, guaranteed livelihoods, and improve quality of life for waste workers will facilitate and accelerate the process of integrating them.

In the absence of such a discussion this Manual might unfortunately provide justification for governments to shirk their duties to provide a reasonable standard of living for citizens, and instead kick the bucket down the road by not acting until the informal sector achieves full integration.

(For each comment please indicate the following)

Part of the Manual:

Part I

Part II

Section:

1.4.4.8 Arrangements for Informal Sct Integration

Sub-section:

Capacity Building and Training of Informal Sector
for Providing MSW Management Services

Comment:

We ask that you please change or remove the language, "Maintenance of work ethics and organization/team work" on page 101. This phrase suggests that informal waste workers have poor work ethics and organizational skills, while the reality is that their work often demands the most rigorous and strong work ethics of any occupation anywhere, often in highly organized team structures. While they - like any person new to the job - would need to go through some training about the demands of a particular occupation in MSW management services, please use different language that is not so laden with negative judgments on the ethical values of informal waste workers, like for example "Adapting to different work schedules and the managerial structures of their new workplaces."

(For each comment please indicate the following)

Part of the Manual:

Part I

Part II

Section:

2.3.2 General Principles

Sub-section:

Role of the Informal Sector in Primary Waste Collection

Comment:

Page 159: "Rag pickers may also be encouraged to form cooperatives, through the involvement of local NGOs/Self-Help Groups (SHGs)." While cooperatives and self-help groups can certainly be very important and beneficial actors in the process of recognizing informal waste management services and improving the quality of life for waste workers, we are concerned that this phrase reflects a larger theme in the DRAFT Manual that suggests that waste workers ought to improve their lives purely through self-help, and that therefore the state has no role to play in improving their lives. Governments are also responsible for actively reaching out to waste workers to identify them (rather than leaving this to an NGO), helping them secure livelihoods (rather than expecting cooperatives to do this entirely), and providing them with social security (as per the Unorganised Worker's Social Security Act of 2008, which says that the government and not self-help groups is the party responsible for providing social security to informal waste workers).

(For each comment please indicate the following)

Part of the Manual:

Part I

Part II

Section:

2.3.7 Informal Collection of Recyclables

Sub-section:

N/A

Comment:

This section discusses the “kabadi system” and the “rag picker system” as though they were two separate systems for managing waste. Although the day-to-day activities of kabadis and rag pickers are different, this characterization of the informal waste management economy as divided into two different sectors is simply inaccurate. Kabadis and rag pickers are all part of a highly complex chain of recyclers across India (and indeed, around the world) that is much more inter-connected than it is divided. Although the Manual’s explanation of the informal chain on page 228 does a slightly better job of explaining how that chain operates, the Manual still displays a woeful ignorance of how the informal economy actually functions.

If AIKMM and other stakeholders could have been part of the drafting process of this manual than we could have helped avoid these mistakes that threaten the credibility of the Manual and might lead officials around India to make under-informed decisions with regard to the informal sector. We would be happy to discuss at greater length how the informal economy actually functions, and how it should properly be incorporated into policy.

(For each comment please indicate the following)

Part of the Manual:

Part I

Part II

Section:

2.3.7 Informal Collection of Recyclables

Sub-section:

"Organizing the Unorganized"

Comment:

We recommend you drop the word "unorganized" from page 171 (it also appears on page 376) of the DRAFT. India's informal waste management economy is a highly organized system, and merely because it is largely unregistered and unrecognized does not mean that it lacks any of the organizational complexity or institutional resilience of any other system of enterprises. The language of an "informal" economy is more apt. (On page 376, which refers to landfills, there are indeed highly organized systems for dividing labor, storing materials, planning work shifts, and so on - even for people who work on landfills.)

(For each comment please indicate the following)

Part of the Manual:

Part I

Part II

Section:

3.1.6 Informal Sector Involvement in Recycling

Sub-section:

N/A

Comment:

Firstly, this section says, "The current practice of material recovery and recycling often causes additional littering in streets, especially when rag pickers rummage in the waste bags and bins." We recommend changing this language, and more importantly we take issue with the implicit value judgment that is conveyed. Rag pickers actually help clean up the litter left in India's streets, gutters, parks, and lakes, and the MoUD should not be reinforcing the harmful rhetoric that these silent environmental heroes are polluting our cities.

Secondly, it says rag pickers "can interfere with vehicle movement" on roads. We would like to remind the MoUD that roads are public spaces in India and as such are not the property of private vehicles.

Third and most importantly, this section says, "It is estimated that a rag picker usually earns Rs 45 to Rs 60 a day while children earn just Rs 10 to Rs 15 a day." Please provide a citation for this estimation. In Delhi, waste workers actually earn about Rs 400 per day so your estimate is incorrect by a factor of almost 10. We would be happy to show you the data we have collected on this matter, and we would like to remind you that had AIKMM been invited to participate in the drafting of these guidelines to begin with then your draft could have contained accurate numbers. Rag pickers are not simply a charity case; they are part of a vast economy that produces great value.

(For each comment please indicate the following)

Part of the Manual:

Part I

Part II

Section:

3.2.12 Integration of the
Informal Sector

Sub-section:

Comment:

On pages 274-5, the Manual reads, "Integrating rag pickers into organized or formal waste management programs can improve the quality of their working conditions and the local environment." On pages 27 and 92 it reads that decentralized options "provide income and job opportunity for informal workers and small entrepreneurs." While we are glad to see that the MoUD is recognizing various ways that good policymaking can benefit waste workers, we recommend changing this language so that it does not only discuss the ways in which waste workers can benefit from cities. You must also discuss the ways in which cities can (and already do) benefit from waste workers - in terms of reduced waste management costs, improved environment, conservation of natural resources, etc etc etc.

(For each comment please indicate the following)

Part of the Manual:

Part I

Part II

Section:

Glossary

Sub-section:

Comment:

The definition of the informal sector contained in the Manual's glossary is, "the part of an economy that is characterized by private, usually small-scale, labour-intensive, largely unregulated, and registered manufacturing or provision of services." This definition refers to an economy that is (a) private, (b) small-scale, (c) labour-intensive, and (d) unregulated and unregistered.

(a) Calling the informal economy "private" is misleading because it disregards the PUBLIC contributions of this economy in terms of reduced waste management costs, increased recycling rates, conservation of natural resources, reduction of pollution, and so on. The work of informal waste workers is public work.

(b) The informal waste management economy is not small-scale. 350,000 people work in this economy in Delhi alone, and although at first glance they may appear to operate in small groups they are all part of a highly complex and coordinated economic chain that effectively forms one large-scale unit.

(c) Yes, the informal economy is labour-intensive. This is a good thing in a country with almost a billion and a half people who need livelihoods.

(d) Yes, the informal economy is largely unregulated and unregistered. But the way the definition is currently phrased seems to suggest that this is the fault of those who work in the informal economy, when in fact per the Unorganised Workers' Social Security Act of 2008 the responsibility of registering informal workers falls to the government.

Appendix to AIKMM letter “Preliminary Comments from Informal Waste Workers Regarding Municipal Solid Waste Management Manual DRAFT 2014”

Proposal

On behalf of the informal waste workers of India, a possible alternative system for the collection, segregation, recycling, transportation, sale, and eventual disposal of municipal solid waste is illustrated in **Figure 1** on the following page. This system is modelled on the city of Delhi and could be replicated in other cities as well.

This system is based on the DDA norm for one dhalao per 1000 population in the *Housing Area* (population 5,000) and 0.60kg waste/capita. On an average, the dhalao will receive 500-600kg of waste per day. Assuming that one waste picker can collect and transport 50-100kg of waste per trip on a cycle with segregated compartments, each dhalao should provide work for 6-10 waste pickers in door-to-door collection and segregation at source.

From the dhalao, each 500kg of waste will generate 250kg (50%) of organic waste and 150kg (30%) of recyclables. Waste picker associations must have the right to process this waste in compost pits and segregation sites (kabari godowns) that are near enough for transport by cycle and cycle-rickshaw within the *Neighbourhood* (population 10,000). Each such site could serve 10-20 dhalaos at a time.

From the compost pit, compost could be transported to local markets on a weekly basis, again by cycle or cycle-rickshaw, for local purchase (partly by MCD itself) and local use in parks and gardens. From godowns, recyclables would have to be transported on a weekly basis by kabari and junk dealer associations on small MTVs to big kabaris and recycling units at the *Community* Level (population 1,00,000).

The balance 100kg of non-usable waste from each dhalao could be transported to a central location in the cluster, again by cycle, from where sanitary trucks owned by private parties would pick up this waste in bulk for transportation to Landfills, either at the *Community* or *District* (population 5,00,000) or *Zonal* (population 10,00,000) levels. Such an integrated scheme would significantly reduce the transportation costs as well as landfill area requirements, provided the private parties do not get the right to recyclables and organics.

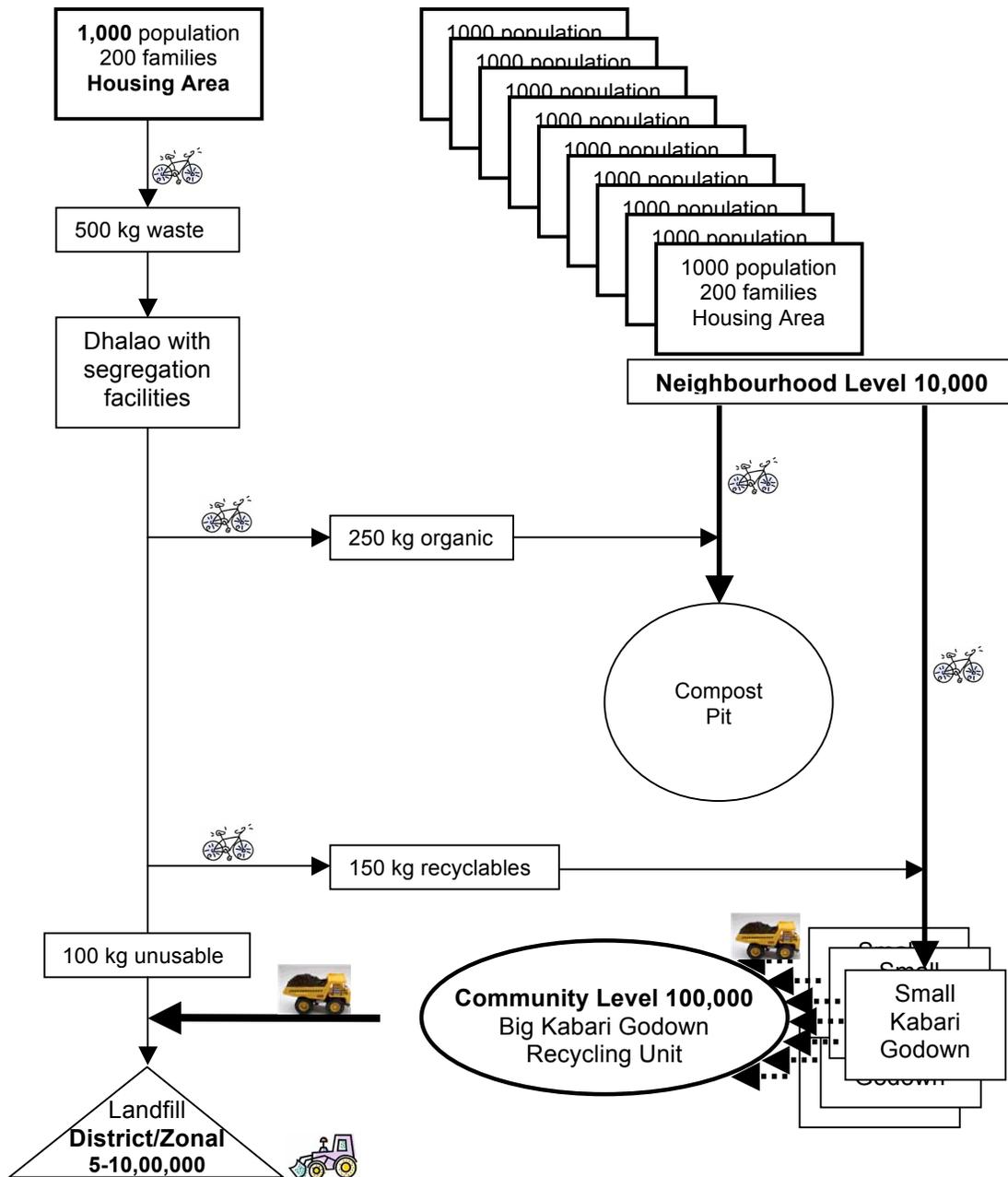


Figure 1