

Tuesday, 27 January 2015



To:
The President of
the Inspection Panel

Subject: Complaint

Dear Sir,

We, the individuals affected by coastal erosion are respectfully informing you that following the building works in the Port Authority of Lome, we, the riverside people, are suffering from the intensifying coastal erosion. Despite all our attempts to claim our rights from the project officials, namely IFC, Bolloré and the Togolese government, our request has received no favourable outcome, but instead intimidation.

Studies have indeed shown that after the first platform was built in 2012, dozens of meters of our lands have been moving into the sea each month (in the 60s, the sea was moving forward by 1 to 7 meters each year). That is why we are accusing the authors of this project of being responsible for the intensifying coastal erosion. In June, July and August 2012, the sea moved forward by 60 meters, resulting in huge material damages such as makeshift housing; coconut fields, leisure centres including OBAMA BEACH; cemeteries; sacred sites in villages such as: BAGUIDA beach AVEPOZO, KPOGAN, AFIDEGNIGBAN, AGBAVI, GBODJOME, DEVIDKEME, ALIMANGNAN, AGBEDRAFO, KPEME and EDO KODJI.

Then, the government through the Ministry of Social Affairs, released an amount of 240,000CFA for 13 affected people at Baguida beach. They went to assess the other villages but with no financial or moral support. In December 2012, there was a second wave of victims and in 2013, we recorded 39 makeshift houses affected by coastal erosion.

In January 2012, we founded the Collective of Victims of Coastal Erosion to defend our rights. Thanks to the conclusions of several meetings between us, the riverside community, and some academics of the University of Lome, we were able to appreciate why our houses have been disappearing so quickly. Some young victims have described this project involving the construction of the third platform as modern enslavement; others suggested going the legal route. Since Togo is a constitutional state and the financial partner, IFC, the lending arm of the World Bank, which has been making every effort to restore democracy and equal rights and to help modernise our judicial system, and received a request from our Collective on 24 March 2014 through the World Bank Resident Representative, Togo office, the bank called us a few days later to discuss our case. We met with Mr. Koffi HOUNKPE, PhD, the World Bank Disaster Risk Management Specialist and the meeting lasted twenty seven minutes. Mr. HOUNKPE said that the conclusion -*the recent sea encroachment is a natural disaster*-, is universally agreed and he told us to contact the Ministry for Environment, in

particular Mr. MOUROU, Ministry's focal point for disaster risk reduction, for further clarification. We also mentioned the results of the environment impact studies relating to the building works in the Port Authority of Lome. Again, the Ministry of Environment, as the financial partner of this project, is best placed to answer our questions. After months of silence regarding our case, a second letter was sent by the Collective under the heading: 'Advance notice of sit-in in front of World Bank offices in Lome'. 28 days after giving notice, we actually received a call followed by a second meeting at the World Bank offices in Togo, which should have started as agreed at 15.00 GMT in Togo. In view of the Resident Representative's workload, we started at 16.39 and finished at 19.12. The effective functioning of IFC and IDA, both members of the World Bank, was questioned and we requested a meeting with IFC Project Manager.

A few days later, our brothers in the Diaspora who are aware of the situation, advised us to contact your institution, the INSPECTION PANEL.

On 16 September 2014, we wrote a letter to request a meeting with IFC Manager and a new environment impact study in relation to this project. That is when the World Bank Resident Representative, Togo office wrote a reply saying that he had forwarded our request to IFC and that the World Bank Group endeavoured to find a solution to our problem. It should be mentioned that in early September 2014, IFC Regional Representative had replied that he had received our letter but he declined all responsibility for this project, arguing as follows: *"Your letters refer to the impacts of the project involving the construction of the third platform in the Port Authority of Lome. Please note that the development of this port infrastructure is not a component part of the project portfolio funded by the World Bank. The only project of port development in which IFC (the International Finance Corporation, which is the private sector lending arm of the World Bank Group) is involved, is the container terminal in Lome where building works started on 26 November 2012."* The project in which IFC is financially involved is the container terminal but IFC denies the fact that this project is linked to the third platform. And since then IFC has remained silent.

N.B.: We attended a meeting at the Ministry of Environment, who stated in front of several chiefs of the affected villages that the construction of the third platform has had no negative impacts on us, the riverside community.

One of the friends of the Bolloré Foundation once said: "Even if Bill Gates loses similar trials in Europe, this is not the case for BOLLORÉ Foundation in Africa".

We are extremely disappointed at how slow the World Bank office in Togo, as a global and apolitical institution, has been acting upon our case.

Conclusion:

We are hereby asking the INSPECTION PANEL Board of Directors to initiate an investigation on our case, the individuals affected by coastal erosion in Togo.

This impact will be very serious for the riverside community who have no homes, no work and it may generate a public menace for tomorrow, such as rural exodus, thefts...

Enclosed:

- [Link to pictures of erosion \(erosioncotiertogo.skyrock.com\)](http://erosioncotiertogo.skyrock.com)
- Dialogue with the World Bank Representative, Togo office
- Dialogue with IFC Regional Representative
- CD with a report on erosion featuring the chiefs of the affected villages

Signed on behalf of the Collective

Edo TONOUDO

Mawuto ABBEY

Amevi TAY