

**Request for Inspection (English – *Unofficial Translation*)**

**COLLECTIF DES PERSONNES VICTIMES  
DE L'EROSION COTIERE TOGO (CPVEC)  
[TOGO VICTIMS OF COASTAL EROSION COLLECTIVE]**

B.P. 4180, Lomé, Togo  
erosioncotiertogo.skyrock.com  
Tel.: +228 90 30 30 03

Tuesday, January 27, 2015

Chair  
Inspection Panel

**Subject:** Complaint

Dear Sir:

We, the victims of coastal erosion, would like to respectfully inform you that, as a result of the construction works taking place in the Port of Lomé, we, the neighboring residents, are the victims of increasing coastal erosion. Despite all our efforts to assert our rights vis-à-vis the managers of said project, i.e., the IFC, Bolloré and the Government of Togo, we have not had a favorable response; on the contrary, we have been subject to intimidation.

Studies have shown that following the construction of the first wharf (in the 1960s), the sea advanced by 1 to 7 meters each year, and by 2012, we were losing dozens of meters of land to the sea each month, which is why we are accusing the project managers of causing increasing coastal erosion. In June, July and August of 2012, the sea advanced 60 meters, causing serious material damage, to huts, coconut palm plantations, leisure areas such as Obama Beach, cemeteries and “fétiches” in villages such as Baguida plage, Avepozo, Kpogan, Afidegniban, Agbavi, Gbodjome, Devikeme, Alimangnan, Agbedrafo, Kpeme and Edo Kodji.

After the government, via the Ministry of Social Affairs, released CFAF 240,000 for thirteen victims in Baguida plage and departed, [there were findings in] the other villages but no financial or moral support was received. In December 2012, there was a second group of victims and in 2013, 39 huts were affected by coastal erosion.

In January 2012, we created the victims of coastal erosion collective to defend our rights. Several meetings between us and professors at the University of Lomé created a clearer picture of the rapid disappearance of our homes. Some young victims have called the project for the construction of the third wharf a kind of modern slavery; others propose [proceeding through] legal channels. As Togo is a country in which the rule of law prevails and the IFC, the financial partner, is a branch of the World Bank, which expends a great deal of effort to restore democracy and equal rights and modernize our justice system, a request from our collective dated March 24, 2014 [was submitted to the World Bank] via the Office of the World Bank Resident Representative in Togo and a few days [later] the Bank called us to discuss our case. We were

received by Mr. Koffi Hounkpè, Ph.D., specialist in disaster risk management employed by the World Bank, and the meeting lasted 27 minutes. The conclusions: according to Mr. Hounkpè, the encroachment of the sea in recent times is a natural [disaster seen] around the world; if we would like clarifications, we should contact the Ministry of the Environment, particularly Mr. Mourou, the contact person for risks and catastrophes at the Ministry. We also mentioned the results of the environmental impact studies for the work being done in the Autonomous Port of Lomé; as financial partner, his answer was still that it is the Ministry of the Environment that is best placed to respond to us. After months with no news on our case, the collective sent a second letter to serve as notice of a sit-in in front of the World Bank office in Lomé. We received a telephone follow-up exactly 28 days after [submission of this letter], followed by a second meeting at the World Bank office in Togo. The result: a meeting that was to have begun at 3:00 p.m. GMT in Togo as agreed, but owing to the resident representative's workload began at 4:39 p.m. and ended at 7:12 p.m. Issues regarding the functioning of the IFC and IDA, both part of the World Bank, were discussed, and we raised the idea of a meeting with the IFC project managers.

A few days later, some colleagues in the diaspora, who are aware of the situation, advised us to contact the Inspection Panel.

On September 16, 2014, we sent a letter requesting another meeting with the IFC manager and a new environmental impact study for this project. At this point the World Bank Resident Representative in Togo replied to us by letter indicating that he had transmitted our request to the IFC and that the World Bank Group was endeavoring to find a solution to our problem. We should note that in early September 2014, the IFC Regional Representative responded to us that [she] had received our letter but declined responsibility in respect of this project for [these] reasons: "Your letters make reference to the impact of the project for the construction of the 3<sup>rd</sup> wharf in the Autonomous Port of Lomé. We would like to advise you that the development of this port infrastructure is not part of the portfolio of development projects financed by the World Bank. The only port development project with which the IFC (International Finance Corporation, which is a branch of the World Bank that finances private sector projects) is associated is the container terminal in Lomé, the construction of which began on November 26, 2012." The project for which financing was provided is the container port. The collective responded that the container port project is a project that is linked to the third wharf but received no response from the IFC.

N.B.: We attended a meeting at the Ministry of the Environment, which declared before several chiefs from the victim village that the construction of the third wharf had not had a negative impact on us, the neighboring population.

Someone close to the Bolloré foundation says: Bill Gates may lose similar cases in Europe; the Bolloré foundation in Africa does not.

We deplore the length of time it has taken the office of the World Bank in Togo, as a global and apolitical institution, to deal with our case.

## Conclusion

We ask the board [and] the Inspection Panel to open an investigation into our case as victims of coastal erosion in Togo.

The consequences will be very serious for the neighboring population, which has no housing or work; [this] can create a public danger in the future, such as rural depopulation, thefts, etc.

For the Collective

/s/

/s/

/s/

Edo TONOUDO

Mawuto ABBEY

Amévi TAY

## Attachments:

- Link to photos in evidence ([erosioncotiertogo.skyrock.com](http://erosioncotiertogo.skyrock.com))
- Dialogue with the World Bank office representative, Togo
- Dialogue with the IFC regional representative
- CD of reporting on the erosion with the chiefs of the victim village

IFC International Finance Corporation  
World Bank Group

*The Country Manager*  
*Benin, Burkina Faso, Ghana, Guinea, Niger and Togo*

Accra, October 29, 2014

Victims of Coastal Erosion Collective  
B.P. 4180  
Lomé, Republic of Togo

**Subject: Letters from the Victims of Coastal Erosion Collective to the World Bank**

Ladies and Gentlemen:

We are writing in response to your letters of March 24, August 1 and September 16, 2014 sent to the World Bank Resident Representative in Lomé, Togo, on behalf of the victims of coastal erosion from June 2012 to the present.

We would first like to say that we are attentive to your concerns, as coastal erosion affects the most vulnerable segments of the population, not only in Togo but around the region and around the globe. Your letters make reference to the impact of the project for the construction of the 3<sup>rd</sup> wharf in the Autonomous Port of Lomé. We would like to advise you that the development of this port infrastructure is not part of the portfolio of projects financed by the World Bank. The only port development project with which the IFC (International Finance Corporation, which is the branch of the World Bank that finances private sector projects) is associated is the container terminal in Lomé, the construction of which began on November 26, 2012.

In accordance with the objectives of the comprehensive poverty reduction strategy and in the context of the implementation of the maritime transport sectoral policy, the Togolese Government signed a concession contract with the company Lomé Container Terminal SA (LCT) on December 15, 2008 for the design, financing, construction, management and operation of a container terminal in the port area. This project is the responsibility of the authorities of the Autonomous Port of Lomé and was the subject of a detailed social and environmental impact study, for which a Certificate of Environmental Compliance was issued on October 22, 2010 by the Togolese Government via its Environment Directorate, which is responsible for its application.

The detailed social and environmental impact studied was carried out in accordance with national laws and the IFC's Environmental and Social Performance Standards, which require the

involvement of the population affected by the project in the context of public consultations and the implementation of development activities for the restoration of livelihoods.

Given that the issue of coastal erosion is a national and cross-border issue, its consequences cannot be mitigated by a single organization or a single project, but rather by a group of stakeholders whose actions must be coordinated under the aegis of the Togolese government, which has sole sovereignty in this area. We thus recommend that you submit your request to the Togolese government via the Minister of Public Works and Transportation. On our side, we will at the same time inform the Minister of the approach you are taking.

We sincerely thank you for your interest in the cause of the victims of coastal erosion and we encourage you to adopt a coordinated approach involving direct communication with the Togolese Government, which is the sovereign authority in this matter.

Sincerely yours,

/s/

Ronke-Amoni Ogunsulire  
Regional Representative

Cc: Minister of Public Works and Transport, Togo  
Minister of the Environment and Forest Resources, Togo  
Minister of the Economy and Finance, Togo  
Minister of Development and Land Use Planning, Togo  
Director General, Autonomous Port of Lomé, Togo  
Director General, ANGE, Togo  
Director of the Environment, Togo  
Coordinator of the National Platform for the Reduction of Disaster Risks, Togo  
Director, World Bank, Togo  
Resident Representative, World Bank, Togo  
Investment Officer, Netherlands Development Bank (FMO)  
Investment Officer, African Development Bank (AfDB)

**World Bank  
Togo Office**

Lomé, August 18, 2014

Our ref.: BS/KH/250/14

Victims of Coastal Erosion Collective  
Lomé, Togo

***Subject:*** *Your follow-up letter of August 1, 2014*

Dear Sir/Madam:

We acknowledge receipt and thank you for your above-referenced letter requesting a new environmental impact study on the project for the construction of the 3<sup>rd</sup> wharf.

In follow-up, we advise you that environmental impact studies for projects receiving financing from the World Bank Group are the responsibility of the government, specifically the Ministry of the Environment and Forest Resources, and we suggest that you contact that Ministry.

We trust that you will receive a favorable response to your request.

Yours sincerely,

/s/

Koffi K. Hounkpè  
Acting Resident Representative

**World Bank  
Togo Office**

Lomé, October 3, 2014

Our ref.: EHL/KH/306/14

Victims of Coastal Erosion Collective (CPVEC)  
Lomé

*Subject: Your letter of September 16, 2014*

Dear Sir/Madam:

We acknowledge receipt and thank you for your letter of September 16, 2014 regarding the problems of coastal erosions affecting the population.

The World Bank Office in Lomé has forwarded your request to the International Finance Corporation (IFC), and we assure you of the interest of the World Bank Group in this issue.

Sincerely yours,

/s/

Hervé Assah  
Resident Representative



**Victims of Coastal Erosion Collective (CPVEC)**

Baguida, June 2, 2014

World Bank Resident Representative  
Togo

Subject: Notice of Sit-in

Dear Sir:

We would like to remind you, via this letter, that in follow-up to our letter of March 27, 2014 you granted a meeting on Tuesday, April 8, 2014 at 3:00 p.m.

During our discussion, you promised to review our situation. However, since that time you have not honored your commitments, which makes our situation very difficult, day by day.

We ask you to take all possible steps to invite the leaders of the collective to a sincere meeting to define the compensation terms.

We would like to inform you that if no such invitation is received in the near future, the collective will be forced to organize sit-ins in front of your office.

N.B.: As Togo is a county in which the rule of law prevails, we will use all legal means to claim our rights. We remind the World Bank to respect its own rules on the project for the construction of the third wharf.

Thank you for your attention to our request.

Yours sincerely,

For the Collective

/s/ Edo Tonoudo

/s/ Abbey D. Mawuto

/s/ Tay Amegi

**Victims of Coastal Erosion Collective**

Cell: 00228 90 30 30 03

Baguida, August 1, 2014

World Bank Resident Representative  
Togo Office

**Subject: Follow-up letter from the Victims of Coastal Erosion**

Dear Sir:

We, the victims of coastal erosion from 2012 to the present, would like to request a new environmental impact study on the project for the construction of the 3<sup>rd</sup> wharf, which has increased the erosion on the eastern side of the project.

Considering that from the 1960s to the 1980s, the sea advanced between 1 to 7 meters [per year], and that recently we have lost dozens of meters of our land to the sea each month, which has caused significant losses for the neighboring population, i.e., field of coconut palms, housing, leisure space, cemetery, etc. [sentence incomplete]. We reject the first environmental study for the above project, which did not involve the neighboring population on the eastern side of the Port and therefore request another study that will involve the villages that have suffered grievously from the encroachment of the sea.

We await your favorable response.

Yours sincerely,

For the Collective

/s/

Edo TONOUDO

/s/

ABBHEY Mawuto

/s/

TEY Amévi

Attachments:

- Some photos
- Cc's to interested parties

**TOGO VICTIMS OF COASTAL EROSION COLLECTIVE (CPVEC)**

erosioncotièrtogo.skyrock.com

Tel.: +228 90 30 30 03

Tuesday, November 4, 2014

Regional Representative of the IFC  
c/o World Bank Resident Representative  
Togo Office

**Subject:** Response to the letter of October 29, 2014

Dear Madam:

We acknowledge receipt and thank you for your letter of October 29, 2014. In our letters we noted that in the 1980s the sea advanced between 1 and 7 meters per year, but since 2012 we have been losing dozens of meters of land to the ocean each month. For this reason, we accuse the managers of the construction of the 3<sup>rd</sup> wharf with responsibility for the increase in coastal erosion, particularly as we, the neighboring population, were not involved in the environmental impact study.

We know that “it is the locomotive that pulls the railway cars”; in the same way, the container port project is a project that is related to the 3<sup>rd</sup> wharf.

What is happening to us is deplorable, which is why we are asking you to apply your regulations to this project, as you have done for every other project carried out in Togo (gas pipeline). Let us avoid rural depopulation. Despite the efforts of our authorities to find technical and financial partners to slow the encroachment of the sea, the problem continues to worsen.

Conclusion: we ask you to request another environmental impact study and a meeting with the IFC project manager for further clarifications.

Thank you for the many sustainable development projects that you continue to implement in Togo. We look forward to your cooperation.

For the Collective

/s/

/s/

/s/

Mr. Edo TONOUDO

Mrs. ABBEY D. Mawuto

Mr. TEY Amevi

[duplicate of letter of August 1, 2014]

**Victims of Coastal Erosion Collective**

Cell: 00228 90 30 30 03

Baguida, August 1, 2014

World Bank Resident Representative

Togo Office

**Subject: Follow-up letter from the Victims of Coastal Erosion**

Dear Sir:

We, the victims of coastal erosion from 2012 to the present, would like to request a new environmental impact study on the project for the construction of the 3<sup>rd</sup> wharf, which has increased the erosion on the eastern side of the project.

Considering that from the 1960s to the 1980s, the sea advanced between 1 to 7 meters [per year], and that recently we have lost dozens of meters of our land to the sea each month, which has caused significant losses for the neighboring population, i.e., field of coconut palms, housing, leisure space, cemetery, etc. [sentence incomplete]. We reject the first environmental study for the above project, which did not involve the neighboring population on the eastern side of the Port and therefore request another study that will involve the villages that have suffered grievously from the encroachment of the sea.

We await your favorable response.

Yours sincerely,

For the Collective

/s/

Edo TONOUDO

/s/

ABBEY Mawuto

/s/

TEY Amévi

Attachments:

- Some photos
- Cc's to interested parties

**COLLECTIF DES PERSONNES VICTIMES  
DE L'EROSION COTIERE TOGO (CPVEC)  
[TOGO VICTIMS OF COASTAL EROSION COLLECTIVE]**  
Erosioncotiertogo.skyrock.com  
Tel.: +228 90 30 30 03

Wednesday, February 16, 2015

Chairperson  
Inspection Panel, USA

**Subject:** Information

Mister Chairperson,

We, the victims of coastal erosion, would like to thank you for last week's phone call despite your very busy schedule. We would like to present a few arguments linking the port for containers project to the third wharf.

In fact the two projects use in common certain material, e.g. sand pomp.

The container port put in place dikes to have deep sea in order to allow big ships to dock.

According to information received from the construction area, the container port is a big port intended to serve the small port for West Africa. It acts as a third wharf and we can even say that it is the fourth wharf. If the third wharf had negative impacts on coastal residents, the container port will as well.

Hence, we urge the Chairperson of the Inspection Panel to send an independent expert to the construction area in order to assess the responsibilities of each party.

While thanking you for the numerous projects of sustainable development that you undertake throughout the world and counting on your good cooperation, we urge you to accept, M. Chairperson, the consideration we have for you.

Have signed for the Collective

/s/

/s/

/s/

Edo TONOUDO

Mawuto ABBEY

Amévi TAY

**WORLD BANK**  
**Country Office of Lomé, Togo**

**Attendance list to the videoconference about coastal erosion**

**Lomé, February 7, 2014**

Number	Name	Institution	Position	Email and phone number
1	(Ineligible)			
2	(Ineligible)			
3	(Ineligible)			
4	(Ineligible)			
5	(Ineligible)			
6	(Ineligible)			
7	(Ineligible)			
8	(Ineligible)			
9	(Ineligible)			