

Submission on the proposed Compulsory National Water and Sanitation Services Norms and Standards, 2024

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Contact details: **Claudi Mailovich, (Researcher IBPSA)**

Email: cmailovich@internationalbudget.org

Tel: 072 225 3070

The International Budget Partnership South Africa¹, which is part of the Asivikelane² initiative, would like to submit the following recommendations and comments on the proposed 2024 water and sanitation norms and standards. The recommendations are based on our work with the Asivikelane initiative that brings together 13 community organisations and 500 informal settlements.

As a general point, our work across these 500 settlements has found that such standards can often be met without allocating significant additional funding. Better use of existing funds often does the trick.

What we like about the Sanitation proposals

1. We welcome the new provision on when and for how long interim sanitation must be provided to residents. The proposed norms and standards provide, under section 6(10), that upon the realisation of a new and unplanned informal settlement, the WSA **must** provide an interim sanitation service within 30 days. It is further important to note that section 6 (7) provides that interim sanitation cannot be used for longer than 12 months. A basic level of sanitation must then replace the interim solution. This is a very welcome addition, as many informal settlements have been receiving interim sanitation for significantly longer than a year.
2. We also commend the specific interim sanitation requirements that municipalities must:
 - Provide a bin with a lid together with the toilet to dispose of menstrual material, and that has to be emptied regularly.
 - Provide water and anal cleansing material (e.g., toilet paper)
 - Ensure that cubicles have functional lighting for safety and security.
 - Separate toilets by gender to meet the needs of women, girls and persons with disabilities.

But how will implementation be ensured?

¹ IBP South Africa is a catalyst for change in South Africa. We are focused on improving service delivery to poor communities through more effective budget implementation.

² This initiative is a collective of informal settlement residents and community organisations who face severe basic service shortages. They monitor the delivery of water, sanitation and refuse collection services and use this information to engage with municipalities. See Asivikelane.org

3. The proposed norms and standards are silent on how government should ensure the implementation of the proposed requirements and guidelines. Over the last four years, evidence collected by informal settlement residents participating in Asivikelane suggests that the 2017 norms and standards were generally not implemented in their communities. Some examples of non-compliance with existing recommendations are:
 - Informal settlement communities were not consulted on the design of the sanitation services provided to their settlements. Despite detailed norms and standards guiding how women's needs should be addressed³, this rarely happened in practice.
 - Another example is the ratio of households to each communal toilet. For densely populated recognised informal settlements, the 2017 and the proposed 2024 norms and standards prescribe 1 toilet for 10 households. However, evidence collected by Asivikelane suggests that, in many settlements, significantly more than 10 households share one toilet.
4. Our central recommendation is, therefore, that the norms and standards should include mechanisms to monitor and ensure the implementation of these norms and standards. Some options are that they be included in municipalities' Service Delivery Budget and Implementation Plans and that the Auditor General of South Africa include these in their audit samples.

Sanitation recommendations

5. We welcome the provision in section 6(3) that a Water Service Authority (WSA) must take reasonable measures to provide interim sanitation in temporary informal settlements, as this means that *all* informal settlements would be eligible to receive sanitation from their municipality.
6. However, we recommend that the norms and standards define what it considers to be a temporary informal settlement to avoid any confusion.
7. Specific guidance should also be provided for the provision of interim sanitation on private and unproclaimed state land.
8. While detailed standards are proposed for interim sanitation (e.g., number of households per toilet unit, functional light within each cubicle), a critical omission is the requirement that each toilet should be lockable from the inside. Residents continue to highlight the dangers associated with using communal or shared toilets that cannot be locked from the inside.
9. We recommend that the provision in the 2017 norms and standards, that the end-user be consulted on the seating and design of the toilet, also be included in the

³ See page 48 of the 2017 National Norms and Standards for Domestic Water and Sanitation Services for examples

2024 norms and standards. Women, mothers, and people with disabilities have specific needs in this regard.

10. We also recommend that the proposed norms and standards be explicit about who is responsible for repairs and maintenance of free basic on-site sanitation such as Ventilated Improved Pit Toilets. Many residents report that the toilets are in desperate need of repair and maintenance, with common challenges including broken slabs and cracked or unstable structures.

One easy option is that the repairs and maintenance provisions from 2017 should again be included in the 2024 norms and standards. The 2017 norms and standards (section 7.3.1) specified that “(t)he household or owner of the sanitation facility is fully responsible for all capital, operation, maintenance and refurbishment actions and costs pertaining to on-site sanitation, unless it is provided as a free basic sanitation service in which case the local authority is responsible for these actions and costs.” This suggests that municipalities, that provide and desludge these toilets free of charge, should also be responsible for their repairs and maintenance.

11. We commend the prohibition in section 6(4) of the use of the bucket toilet by municipalities as a sanitation intervention. This is a critical step towards dignified sanitation and marks an improvement on the 2017 national norms and standards.

Water recommendations

We applaud that the proposed norms and standards require a WSA to take reasonable measures to provide interim water services in informal settlements. Specific proposals include that every person must get at least 25 litres of potable water each day, or 6kl per household. The water must be available for at least 350 days a year and cannot be interrupted for longer than 48 hours.

We recommend that the proposed norms and standards should also make provision for a fault reporting mechanism that can be used by residents to ensure uninterrupted access to water. Residents continue to report that they are often left without access to water for more than 48 hours when taps are broken, or water tanks are not filled. Fault reporting systems are often absent, dysfunctional, or not suited to informal settlements. When residents *are* able to report faults, these are not attended to within 48 hours, and residents have no way of following up on these reports.

12. According to the proposed 2024 norms, the access point for interim water is a communal standpipe, which can be no further than 200m from the furthest household. We recommend that this distance be revised back to the 2017 standard of 100m.
13. We also recommend that the norms and standards consider providing for a ratio of a maximum number of households to tap. Basing a standard on a maximum distance

does not take into account the of number of households that have to use a communal tap. Evidence collected by Asivikelane shows that residents must often wait in lines for long periods to use a communal tap, and that overuse also contributes to frequent damage to taps.

14. Residents continuously report that chemical and VIP toilets are not drained often enough, leaving them with toilets that are too full to be used. We therefore welcome the more specific standards for faecal sludge management that:
 - All portable and mobile toilets must be emptied every third day.
 - Full pits, tanks, and containments for on-site sanitation which are full must be emptied within 10 days of it being reported.
 - All container-based toilets must be emptied four times a week.