

1.0 INTRODUCTION

The civil society Organisations in water and sanitation sub-sector mobilized under the umbrella organisation, UWASNET take note of the various key achievements the sector has registered over the past financial year 2016/2017 as reported in the Sector Performance Report (SPR) 2017. This response paper provides key insights of the 2017 SPR review by UWASNET members for reflection and strategic decision making towards achieving sector targets and universal access to water and sanitation. Our assessment therefore analysis highlights gaps and recommendations under the different sections of the SPR including: sector planning and finance, governance, rural water supply, urban water supply, water resources management, water for production, sanitation and hygiene, climate change and gender.

2.0 ASSESSMENT OF PERFORMANCE

2.1 PROGRESS ON JOINT SECTOR REVIEW UNDERTAKINGS

CSOs appreciate the progress made towards implementation of the 2016 JSR Undertakings where a total of four undertakings have been achieved and seven partially achieved and only one was not achieved at all. This is an improvement from last year where a total of three undertakings were not achieved out of the adopted 11 undertakings. However, CSOs are concerned of the lack of commitment to finance/prioritise implementation of undertakings especially those carried over from the financial year 2015/2016 such as Undertaking #1 on development of the ENR performance monitoring framework.

Issue identified: There was over-reliance on "consultant-driven studies" as a first step to the implementation of most undertakings. This was especially observed in the unachieved undertaking #6. While it is important to conduct situational studies, these don't have to be outsourced to consultants. Given that the Ministry collects data regularly through its monitoring mechanisms, there should be enough information to inform certain decisions and actions proposed in most of the undertakings. For example the utilization of water storage facilities can be established through regular monitoring by the ministry technical teams.

Recommendation: The Ministry needs to efficiently utilise its resident human resource capacity to fast-track implementation of undertakings and reduce expenditure on consultants. Rather than wait for funds to engage consultants to undertake studies, MWE could work with its M&E Personnel to collect information; or the communication team to document achievements. Overall, there is need to finance implementation of the sector capacity development plan towards human resource but also consider integration of non-state actors as beneficiaries and as contributors to the sector capacity development plan.

2.2 SECTOR PLANNING AND FINANCE

CSOs appreciate the nominal increment in the budget allocation to the water and environment sector for the FY 2016/2017 equivalent to UGX 1.098 trillion up from UGX 592.7bn in FY 2015/2016. This allocation is also in excess of the NDP II Medium Term Expenditure framework projections of 592.7bn for the FY 2016/2017. However, CSOs are concerned about the overall water and environment sector share of the national budget which remained low at 3% in FY2016/2017 and 2.9% for this current Financial Year.

Issues identified: There is significant disparity between approved and actual released budget which affects planning and attainment of set sector targets. For instance, CSOs observe that of the total approved budget of UGX 1,098.6bn, only 78% (UGX 857.9bn) was actually released and the sector absorbed 94% (UGX 811bn) of the total released funds inclusive of the off-budget support (UGX 54.9bn). This implies that the sector operated at 73% of the total approved budget (UGX 1,098.6bn) and this affects sector capacity and efficiency to deliver sustainable services. In addition, CSOs have observed the increasing sector reliance on internally generated revenue Appropriated in Aid (AIA) by government. Whereas government and donors commitment was planned at 30% and 33% respectively for the financial year 2016/2017, the actual total released budget was significantly raised from AIA (41%) while government and donors accounted for 35% and 17% respectively. CSOs are concerned that government and donor commitment to finance the sector is significantly reducing and over reliance on internally generated funds cannot be sustained with declining subsidisation of sector institutions such as NWSC, NFA, KCCA, etc.

Recommendations: CSOs call recommend for renewed commitment from both donors (development partners) and government towards sustainable financing for the water and environment sector which should be matched in terms of actual releases. There is also need for capacity development for the sector to harness new financing opportunities existing in climate change through mainstreaming adaptation actions in sector programmes

In addition, CSOs recommend that the Sector Investment Plan (SIP) under development should be informed by baseline data for the revised indicator framework to ensure efficient financial planning that will meet the ambitious SDG targets

2.3 RURAL WATER SUPPLY

CSOs recognise progress made towards increasing access in rural areas reaching 70% as of June 2017 up from 67% in June 2016.

Issues identified: The failure by 16.5% of the 115 districts to absorb all the funds disbursed to them affects services to the community as the unspent funds was returned to the center. The total amount of unspent fund worth 6,765,255,542, the figure that could have provided about 338 additional hand pump/ boreholes (at an estimated unit cost of 20 million per borehole) serving about 84,500 people. CSOs observed that some districts such as Hoima and Kamuli diverted unspent WASH funds equivalent to 530,000,000 (half a billion) to support other departments and payment of pensions of former civil servants respectively. This presents a big challenge to an already underfunded sector that cannot adhere to the guideline for utilization of the conditional grant for rural water supply.

Recommendation: Given the fact the fund allocated to this sector annually is inadequate, there should be effective planning and close monitoring/supervision especially of the district water and sanitation conditional grant to ensure all the funded interventions are implemented within the financial year and regular monitoring of utilization by districts to ensure adherence to avoid diversion of funds to other departments. Furthermore, accounting officers who allow unjustifiable diversion of funds should be reprimanded.

Issue identified: Access to safe water of 70% is calculated based on the water facilities working only excluding those which have not been working for more than five (5) years means that those which have not been working for 1 up to 4 years are included in the calculation and yet they are not being used.

Recommendation: There is need to calculate coverage based on only functional water sources and increase budget allocation to allow procurement of spare parts for major repairs by districts and rehabilitation of boreholes so that incidences of regular break down are controlled thus increasing water access through improved functionality and reliability of water sources

2.4 URBAN WATER SUPPLY

CSOs applaud the progress made to increase access to safe water in urban areas from 69% to 71% in FY 2016/2017. Major systems extensions and rehabilitations which have improved thanks to the work by Umbrella organizations are also recognised. The rolling out of the Utility Performance Management Information System which has generated accurate and reliable data on the status of the supply systems is another commendable milestone the CSOs have recognised.

Gaps identified.

- There is limited capacity of the umbrella organizations to carry out some activities such as water treatment and advanced water quality testing for larger systems.
- There are no detailed IWRM plans for systems gazetted to NWSC especially in small towns.
- The management arrangement of schemes outside NWSC and the newly gazetted Regional authorities/utilities is unclear, let alone the coordination arrangement between NWSC and the Regional utilities in districts where they are sharing towns.

Recommendations:

- Adoption of clear catchment management plans by NWSC especially for the freshly gazetted systems and highly degraded systems in new towns
 - Streamline institutional arrangements in urban and small towns including take-over processes by NWSC to allow for sustainability of service provision, better coordination and customer satisfaction.
 - Prioritise financial and technical capacity development of the newly gazetted regional utilities focusing on business management and systems strengthening
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2.5 WATER FOR PRODUCTION

CSOs commend the improved performance on water for production indicators including: the national cumulative storage for water for production that increased from 37.2 million cubic meters (in FY 2015/16), to 38.9 million cubic meters as well as the 1% increment in functionality of water for production facilities to 85%. There has also been increment in the percentage of water points with actively functioning water and sanitation committees from 81% to 83%.

Issues identified:

There was delayed completion of outputs e.g. Olweny irrigation scheme attributed to funding constraints. The report reflects uncompleted works yet funding had been committed at the planning stage. This could have been as a result of the low budget release (17%) by the donors and it is likely to affect achievement of NDP II target of 50 million cubic meters by 2020 if improvements are not made.

There is less engagement of women in key positions of management structures of dams. The report mentions no change in the numbers of women holding key positions in either Valley tanks or dams. This leaves an impression that there is less interest by women to participate in management of Water for production facilities. However, if water for production is to enhance the economic status of households, it's important to bring more women on board in key positions.

Recommendations:

- There is need for a detailed investment plan for water for production across districts as part of the Irrigation master plan MWE and MAAIF will be developing
 - There needs to be improvement in beneficiary data tracking and indicator adjustment from measuring storage alone to also providing information from other forms of sources used to provide water used for production.
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2.6 WATER RESOURCES MANAGEMENT

We recognize government efforts in undertaking timely water resources assessments through establishing new and rehabilitating existing water quality and monitoring stations and upgrading of regional laboratories from manual to telemetric to ensure timely data and information to inform decision making. However, we note that the mode of data dissemination is demand driven and there is no deliberate effort to disseminate it to stakeholders through the available online and offline platforms such as working groups which has limited its usage.

Recommendation: We propose ministry to conduct timely data/information sharing to the relevant stakeholders through the available platforms to inform wider scale utilization and informed decision making but also for checks and balances.

Water quality management

The steady increment of the water quality monitoring stations from 26% in FY 2010/11 to currently 73% in the FY 2016/2017 is well appreciated. This has enabled the sector to further appreciate the low levels of water quality. For instance, out of the 216 sources sampled, only 50% were safe. The Presence of Escherichia coli (E. coli) in most of these drinking water sources is very disappointing. Out of the 176 households where drinking water was tested, only 32% had safe water.

We appreciate the monitoring and enforcement efforts by the directorate in compliance to the Water Act and Water Resources Regulations. As per the SPR, the bulk of the water users without permits turn out to be from the Umbrella Organizations, Water and Sanitation Development Facilities (WSDF) and National Water and Sewerage Corporation (NWSC), CSOs and many private water users with motorised boreholes in urban areas.

Recommendation: There needs to be an exemption for CSOs from paying permit fees for abstraction considering that they are only providing a social service as opposed to doing business.

Catchment based Water Resources management

The efforts to initiate development of relevant guidelines including the water source protection guidelines, wetland restoration guidelines and the Catchment based Water Resources guidelines is well appreciated. However these have not been implemented or scaled down at sub-catchment level.

Recommendation: MWE needs to fast track the finalization of the Catchment based Water Resources guidelines to inform the ongoing efforts to start implementing the developed 15 catchment management plans. At the same time develop popular versions of the catchment management plans to guide implementation of activities at micro catchment level.

2.7 SANITATION AND HYGIENE

CSO acknowledge and appreciate the key achievements in the sector, notably: The gradual annual increase in sanitation coverage by about 1% from 79% to 80% in the rural areas and from 84.6% to 85.5% in urban areas and also the increment in the presence of hand washing facilities at households from 36% to 37% and 34% to 35% respectively due to increase in the number of financing sources like the DWSCG, USF and DHSCG. It is also observed that the Quality of reports on sanitation and hygiene from the Districts is improving leading to presentation of detailed information. There is also improved collaboration between sector players, line Ministry and District local government.

Rural Sanitation and Hygiene

Whereas most districts worked on creating demand for improved sanitation, using either Community Led Total Sanitation (CLTS) or Home Improvement Campaigns (HIC) as key approaches, only 258 of the 1,433 (18%) villages worked in during the reporting period attained open defecation free (ODF) status.

CSOs are concerned that the reported 18% ODF attainment is too low compared to last year's 26% and the sustainability of ODF villages is poor. This brings to question the effectiveness of CLTS as a stand-alone approach and the CLTS verification process.

Recommendation: In order to address the identified gaps of quality of reporting and sustainability of ODF villages, we the CSOs recommend that future sanitation and hygiene improvement efforts must use a combination of approaches besides CLTS, and HIC. Other approaches proposed could be PHAST, CHAST, Sanitation and Hygiene Marketing, etc. We also recommend that the ODF verification protocol be reviewed to broaden the scope of the verification team to include entities like TSUs on the verification team

Urban Sanitation and Hygiene

Report focuses more on achievements in Kampala thus resulting into under reporting on the status of urban sanitation in the country.

Recommendation: We recommend future reports to capture data and information from all urban areas including upcountry towns

The interventions and related reporting did not consider solid waste management in urban areas yet solid waste management has a strong bearing on the underground water regime and also presents various health risks.

Recommendation: We recommend that the Ministry undertakes delivery efforts to improve interventions for solid waste management in urban areas and should also improve reporting on the same

School sanitation

Whereas School sanitation national standards recommend a pupil to stance ratio of 40:1, the pupil: stance ratio has increased from 70:1 to **71:1** in FY2015/16 meaning that pupils have to queue for longer in order to access a toilet facility at any given time. Out of the 111 districts (excluding Kampala) only 4 districts meet the national school sanitation standards.

CSOs are concerned about the reduced low coverage of sanitation in schools and the policy by Ministry of Education to have only drainable pit latrines in schools. This approach is good but does not cater for the faecal sludge management. There is notable absence of some of the key elements in the sludge management chain like sludge emptiers as well as treatment and final disposal facilities. In addition, the current school Latrine standard design is not conducive for Menstrual Hygiene Management.

Recommendations: Government should prioritize setting up sludge management systems at District level and also encourage CSOs to invest in faecal sludge management either as a joint venture or as individual organisations through incentives like tax holidays. In addition, given the new trend in faecal sludge management, central government should encourage the local governments to take interest in building their own capacity in faecal sludge management premised on modern techniques that are more effective with a linkage to reuse of treated sludge.

We also recommend that the standard design of the latrine structure at schools should also include provisions for proper and convenient MHM such as: private room, incinerators and drop off hatches.

Other salient CSO concerns

CSO observe that the sector report does not capture issues of WASH in Health facilities yet achieving universal access set in the SDGs will require disaggregation of access at all service levels: households, schools and healthcare facilities.

CSOs are also concerned that the golden indicator on Per-capita investment combines both water and sanitation. This makes it difficult to track the investment in sanitation for each of the beneficiaries.

Recommendations:

We recommend that the planning, tracking and subsequent reporting on per-capita investment be clearly disaggregated by water and sanitation/Hygiene. Reporting should be expanded to capture all urban areas in the country as opposed to Kampala alone.

We further recommend inclusion of an indicator for WASH in health facilities.

2.8 CLIMATE CHANGE

We recognise the great achievements registered by the department to initiate the Climate Change bill development process that is on-going. MWE's participation in COP 22 in Marrakech and initial preparation to attend COP 23 in Bonn, Participation in the Bonn Conference on climate change, securing approval of the Climate Change Department Structure, building the capacity of the staff therein, and conducting Climate change vulnerability assessment in 32 districts out of 112. The department also established a National Green House Gas inventory system to keep track of the different players involved in Climate change related work.

Issue identified: We note that the established National **Green House Gas (GHG) inventory system** relies more on other sectors that are responsible for greenhouse gas emissions. This not only compromises the level of commitment but also quality assurance and accessibility to the data generated.

Recommendation: CSOs recommend that the Climate department to fully takes lead in the process of tracking GHGs by procuring and installing equipment required for GHG data collection and monitoring. This however will require in-house capacity development of the Climate change Department to play this role.

We note that the Climate Change **Baseline Surveys** were conducted in **32 District** Local Governments- The concern is whether 32 districts is representative of the 112 districts in Uganda and what was the criteria for the selection of the districts.

[We recommend carrying out a Climate change vulnerability assessment covering the entire country to inform the baseline.](#)

We note the Challenge of financing in the climate change department, however we observe the opportunity of the Commissioner of the Climate Change Department nominated to chair the Accreditation Panel of Adaptation Fund and recommend for internal capacity building in resource mobilisation for both government and civil society to tap into this fund.

Other pertinent recommendations:

- [MWE to fast track the on-going process of reviewing the climate change bill](#)
 - [DLGs should be supported by the Climate Change Department and CSOs to mainstream climate change in the district development planning process as well as the district environment action planning process.](#)
 - [Government should embrace the Ecosystem based Adaptation approaches in strengthening the resilience of both communities and the ecosystems to effects of climate change targeting supporting the Vulnerable groups including women, children/youth, disabled, Indigenous people who are the most affected by effects of climate change](#)
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2.9 CROSS-CUTTING ISSUES

Realizing the efforts made by the ministry to mainstream gender in the different WASH sectors, we take note of the gap in implementation of the water and sanitation gender policy. The SPR does not clearly indicate how many members of the different gender

categories (women, men, youth, disabled, etc.) have been deliberately targeted in WASH service provision and capacity development initiatives. The statistics in their present form are so generic. We thus recommend that in the sector reports, statistics given should be gender disaggregated to clearly show the impact of the ministry initiatives to promote sharing horizontally and vertically in gender mainstreaming.

Gender mainstreaming in rural water supply and sanitation

Despite the bigger women representation in key positions on the water and sanitation committees, their ability to effectively undertake their responsibilities is not captured. We observe that in many instances, women are overpowered by the smaller percentage of men thus limiting their capacity to effectively play their respective roles.

[Recommendation: Efforts should be geared towards empowerment at all levels \(capacity and a conducive environment\) to enable women take up leadership positions effectively.](#)

Gender position of staff

Whereas women are holding top management positions at the ministry level (15%) compared to 85% by male counterparts, we believe this is still low and translates into women's low contribution and influence to sector growth.

Sanitation facilities for school children and people with disabilities

We recognize government efforts in increasing sanitation in schools however there are still gaps in addressing the sanitation needs for people with disabilities especially in segregating stances for both gender to fully observe privacy. In addition, efforts to address fecal sludge management, hand washing and menstrual hygiene are still minimal.

[Recommendation: There needs to be a well stipulated Operation and maintenance plan for hygiene and sanitation facilities in schools for example emptying, repairs and replacement and or consider technologies that are sustainable e.g. drainable.](#)

2.10 GOOD GOVERNANCE

The incorporation of good governance indicators in the sector reporting framework and the steps to test their viability is a step in the right direction. The focus on the most important principles of accountability, transparency and people participation is also noteworthy. The outstanding performance of MWE in the PPDA's procurement audit report should also be applauded.

Issues identified:

- Sector accountability and learning from international forums and events such as Water Integrity Network (WIN) are not domesticated and scaled up.
- Generally, we observe that there is need for further analysis of the key factors that affect trends in good governance in the sector. For example, if there is improvement in participation of women in Water User Committees, its implication to sector growth and performance should be explained.
- The customer satisfaction index reported does not indicate the actual progress on improving service quality

Recommendation: The sector needs to re-institutionalise the good governance Secretariat and provide significant funding for its operations. We also recommend for more investment by government and non-state actors in documentation and sharing of success stories in good governance to ensure sector-wide inspiration

3 CONCLUSIONS

Overall, the sector is making significant progress towards realisation of universal access to water and sanitation. However, outstanding bottlenecks including the declining sector financing especially from development partners, high population growth rate and climate change undermine positive gains registered. These and others will need to be addressed moving forward if the sector is to achieve progressive realisation of the SDG targets for WASH.

It will be critical for the sector to collect baseline data and start reporting against the revised sector performance indicators. It is expected that coverage rates will go down in attribution to the high standards set by the revised indicator framework. This will require increased investment commensurate to the required service quality and demand.