Session (4): Enabling Policy and Regulatory Framework: Innovations in Governance

Policy to practice – Learnings from implementation of innovation

April 25 - 27, 2023
Structure of Presentation

Contents...

• Setting context
• Innovations
• Learnings/Key Reflections
1. Multiple forms of sanitation and sanitation services existed:
   - Acts and Rules (Municipalities Act, Public Health Act etc.) and Guidelines
   - Public institutions (MAWS, UA, Water and Drainage, SPVs, NGTs, PCB)
   - Private service provides part of the service delivery

   Government willingness: Sanitation for all 2023

   a. Absence of regular revision of rules to match current needs,
   b. Lack of provisions for inclusion of overlooked or newly evolved components through new bye-laws or Rules
   c. Adequacy of bye-laws and Rules provisioned for the enforcement of many Acts is a matter of concern
Accelerating Decisions: Modality of working

- **STATE**
  - Advisory Committee (AC)
  - (Key Government Officers)

- Technical Support Unit (TSU)

- **CITY**
  - Working Group

- City TSU
Innovation 2

New Governance Systems for cluster operations

Issuing of **State Investment Plan** to maximise treatment capacity through co-treatment, creation of new treatment facilities and scaling access to treatment facilities through cluster approach

Creation of **Memorandum of Understanding (MoU)** between cluster ULBs to provide facilitative framework for management of treatment of facilities

**Salient features of the MoU:**
- Obligations of the Lead & Participating ULBs
- Payment Terms
- Review and Amendment
- Term and Renewal
- Suspension/Temporary Shutdown/Downtime or Closure of the FSTP
- Dispute Resolution
- Termination

Creation of **Standard Licensing Agreement (SLA)** for regulation of operators and promoting safe disposal at facilities

Creation of **Bye-Law for Management** to provide a legal/ regulatory backing to implement MoU/ SLA

Working towards a paradigm shift in the global south...
Through SLA, **licensing fee** of Rs. 2000 per truck (license valid for 2 years) and nominal **decantation fee** collected.

MoU mandates **securing** funds through **separate bank accounts** for FSM.

**O&M cost sharing** between ULBs:

\[
\text{Population of Host or Participating LB} \times \frac{\text{Population of LB Cluster}}{\text{O&M Cost of Treatment Facility Per Year}}
\]

**For urban-rural clusters, the population proportionate to households with septic tanks is considered as the population of the Village Panchayat for the cost-sharing formula.**
Regulating on-site sanitation system

<table>
<thead>
<tr>
<th>Before Intervention</th>
<th>After intervention</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image1" alt="before" /></td>
<td><img src="image2" alt="after" /></td>
</tr>
<tr>
<td><img src="image3" alt="before" /></td>
<td><img src="image4" alt="after" /></td>
</tr>
</tbody>
</table>

**CT/PT**

1. Containment improvement options; scale-up through government systems; scheduled desludging

**Other Bulk Generators**

1. Building on current provisions: Building rules, and enabling existing privately served markets
2. Capacity building- implementation action planning

**IHHT – New constructions**

1. Building rules revision and implementation support

**IHHT – Retrofitting existing systems**

1. Demonstration of improvements to meet standards/ functionality at affordable costs

Automated chlorination of liquid effluent
Revisions / Strengthening Existing Governance Systems - Roles and Responsibilities for on-site sanitation

ULB-led Implementation: process changes, roles and responsibilities recommended

<table>
<thead>
<tr>
<th>No.</th>
<th>Processes (examples)</th>
<th>ULB FSM Role</th>
<th>Private Sector Engagement</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Management of de-sludging operations</td>
<td>1. Licensing de-sludging operators</td>
<td>De-sludging service provision</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Provision of de-sludging services to CT/PTs, government schools, urban poor locations</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>3. Monitoring to prevent unsafe disposal and spillage</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Construction, O&amp;M of treatment facilities and reuse of treated products</td>
<td>1. Review of design and costs</td>
<td>Private service for construction, quality assurance and O&amp;M of treatment facilities with reuse activities.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Contracting of construction and O&amp;M</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>3. Inspection against prescribed standards</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>4. Monitoring O&amp;M and reuse activities as per standard protocols</td>
<td></td>
</tr>
</tbody>
</table>
Timeline of Governance Outputs

State-Level

Operative Guidelines (OG) for Septage Management
Government Order
State Investment Plan
Amendment of Tamil Nadu Combined Development and Building Rules

Local Body-Level
Byelaws for Septage Management
Government Order
Memorandum of Understanding for Cluster Approach
Standard License Agreement for Private De-sludging Operators

Cross-cutting: Systems and Procedures

Municipal Act Amendment-Faecal Sludge and Septage Management Chapter
Septage Management Rules
Operative Guidelines for Septage Management Revised

2014  2018  2019  2020  2022  2023

Working towards a paradigm shift in the global south…
Context Setting: Sanitation workers

1. Workers can be categorised by: ULB-payroll or contracted, privately employed, independent (daily wage) workers

2. Informal workers proportion is significant; wide disparity on benefits and entitlements

3. There are multiple welfare schemes handled by multiple departments, but access is a key concern: awareness and documentation process
1. Linking with welfare schemes - insurance, scholarships and support to physically challenged.

Strategy
a. Awareness creation - booklet for workers
b. Support with documentation
c. Registration of informal sanitation workers/ occupational cards
d. Establishing and building capacities of community-based organisations

2. Customised health camps (general checkup and / or eye care consultation)

Impact: ~2,400 sanitation workers benefitted, 57 SHGs consisting of 593 community members organised and 23 Youth Clubs formed.
1. Strengthening Existing Livelihoods
   a. Sanitation workers assisted in availing loans
   b. Enterprise development support for women sanitation workers.

2. Supplementary/ Diversification
   a. Linkages with NULM: Creation of SHGs + Training

3. Alternate employment opportunities created through:
   a. Skill/ Entrepreneurship Training
   b. Market Assessment + Linkages
1. Developing credibility takes time, concerted efforts and multiple approaches

   Get govt. buy in through financial commitments (SIP) and ownership (AC/SWG - committees)

   Build on existing institutional strengths

   Operational continuity requires institutionalised systems and process

   Innovative multi-modal capacity building mechanisms required to overcome resource constraints
Thank you!

Name K V Santhosh Ragavan
Designation: Senior Lead, Team Lead - TNUSSP
Organisation IIHS
Email: santhoshkv@iihs.ac.in