



Southern African Catholic Bishops' Conference
PARLIAMENTARY LIAISON OFFICE



**Submission to the
Department of
Water and Sanitation**

on the

Draft National Sanitation Policy

12 March 2016

1. Introduction

The Catholic Parliamentary Liaison Office of the Southern African Catholic Bishops' Conference welcomes the opportunity to comment on the draft National Sanitation Policy. Access to clean, safe and dignified sanitation facilities for all is a basic human right. Sadly, many thousands of South Africans lack access to such facilities. The continued violation of this right is one of Apartheid's greatest legacies and one of South Africa's currently most testing challenges.

We therefore commend the Department of Water and Sanitation for creating this comprehensive sanitation policy, and hope that the policy, once it is concluded, will provide urgently-needed improvements in the situation.

We wish to draw attention to a few points:

2. Commendations

2.1. We support the fact that the policy commits the Minister to developing norms and standards for sanitation in informal settlements, which cannot be treated as temporary or transitory when so many people have lived their entire lives in these communities. With the very serious housing backlogs in our metropolitan areas it is clear that large numbers of people will continue to live in informal settlements; accordingly, proper norms and standards must be introduced to serve their interests in the long term.

2.2. A lack of basic standards and long-term planning have been some of the biggest obstacles to improving access to basic sanitation in informal settlements. It is therefore encouraging that this policy begins to shift away from treating informal settlements as temporary, emergency environments, to dealing with the reality that they are long standing, established communities that require permanent infrastructure and long-term planning.

2.3. We welcome the introduction of a National Sanitation Information System for the purposes of record keeping and accountability in addition to fulfilling a monitoring, reporting and evaluation role.

3. Proposed Changes

3.1. Timeframes: this otherwise far-reaching sanitation policy is marred by a lack of timeframes. There are no adequate deadlines for the implementation of some key aspects, such as norms and standards, as well as the regulations, which will necessarily stem from the policy. A disciplined approach to implementation requires clear timeframes and deadlines, which enhance both transparency and accountability.

3.2. Norms and Standards: the Minister is required to develop norms and standards for appropriate technology. Such technology should embrace innovative designs, including water saving urinals and basins, composting toilets, and water recycling systems. The technology used should also allow incorporation of the existing systems with minimal changes aimed at reducing water usage. At the same time, the technology used must be robust and easy to install and repair.

3.3. Training: quite often, communities are supplied with equipment and technology, which requires expert knowledge to repair. This is expensive and leads to delays, thus depriving communities of the use of such equipment or technology. It would be desirable, therefore, wherever possible to ensure that community members are trained to carry out simple repairs and/or adjustments in the event of equipment failure or breakdown.

3.4. Free Basic Sanitation: regulations to monitor the enforcement of free basic sanitation will need to be developed in order to ensure that water services institutions comply with the provision, and to ensure that beneficiaries do not circumvent the system. As stated above, the lack of timeframes in this regard is a matter of concern.

4. Conclusion

We welcome the development of this policy and look forward to improved provision of adequate sanitation in our communities. We wish the Committee well in its deliberations.

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