





National Workshop on Small-Scale Sanitation Systems

## A Roadmap for Small-Scale STPs in India: Fulfilling their Potential for Healthy and Water-Secure Cities

# Governance of SSS in India Strengths and Gaps in the Institutional and Regulatory Frameworks

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## Content

- ✓ Governance in 4S
- Methodology
- Policy and regulatory framework
- Effluent standards and reuse policies
- ✓ Institutional arrangements
- Allocation of roles and responsibilities
- ✓ Monitoring



## Methodology

#### Mixed method approach linking the policy level to impact on the ground



## A dynamic policy and regulatory framework

#### **Policy trigger**

> MoEF

EIA 2004 & 2006



#### SSS Policy influencing Initiatives

- MoUD building by-laws
- Green Building Rating Systems
- National Water Policy
- Centre for Excellence for Decentralised Wastewater Management

	Legal threshold for SSS
Bangalore	> 20 apartment units
Hyderabad	Buildings >10,000 sq.m.
Pune	Buildings > 4000 sq.m.
Andhra Pradesh	Buildings > 5000 sq.m.
Goa	> 40 apartment units
Tamil Nadu	> 50 apartment

#### **STATE & CITY LEVEL**

#### **NATIONAL LEVEL**

Different States/cities - different regulatory frameworks Different scope for SSS, but also reuse policies

- «Trial and error» process
- **Reuse policies** not always pragmatic (e.g. zero liquid discharge policy )
- **Retroactive policies difficult to implement** (e.g. STPs in existing buildings or dual plumbing in existing buildings)
- Often lack of alternatives (e.g. discharge of treated wastewater into stormwater drains to be addressed)
- Mismatch between supply and demand of treated wastewater



Uber-like app to connect buyers and sellers of treated wastewater ?

## **Effluent and reuse standards**

No dedicated standards specific to SSS

Some standards more stringent than in the European Union or Japan !

- No reuse specific standards
  - $\Rightarrow$  Adapt to different reuse/disposal?

quality of the receiving water bodies; discharge to sewer network; stormwater drain; greywater recycling for toilet flushing; construction site; gardening; agriculture

- ⇒ The practical implications for implementation by building owners should be thoroughly studied
- ⇒ The advantages and limitations of SSS systems need to be well balanced **before** imposing new standards.

## SSS in the policy framework

• At national level:

National Urban Sanitation Policy 2008

Jawaharlal Nehru Urban Renewal Mission (JNNURM) 2005 Atal Mission for Rejunevation and Urban Transformation 2015

 $\Rightarrow$  No reference to small scale STPs (unlike FSM)

- SSS not explicitly recognised as a sanitation system option next to centralised sewerage and FSM
- Lack of a clear policy framework for SSS, incl. technical specifications.
- No SSS in the State Sanitation Strategies and City Sanitation Plan.
- The Census of India only mentions "connection to centralised sewer network", "septic tank" and "others".

 $\Rightarrow$  Currently, SSS is not on the sanitation map



## SSS in the institutional framework

- Responsibilities scattered between pollution control boards (PCBs), urban local bodies (ULBs) and water supply and sewerage boards (WSSBs)
- Responsibility for long-term monitoring is often not allocated
- Lack of capacities and ownership by WSSBs and ULBs
- Lack of comprehensive and unified SSS database
- Loopholes in the technology selection, design, implementation and O&M of SSS systems

 $\Rightarrow$  Leads to observed overall bad performance of SSS

## Institutional arrangements- the case of Bangalore



## Loopholes in the institutional arrangements

- CAPEX is the main selection criteria, not OPEX nor sustainability; lack of expertise for technology selection
- Non-qualified MEP consultants: lack of expertise for implementation
- Consent for establishment: lack of seriousness in design evaluation
- Poor database management and lack of unified database
- Consent for Operation: lack of control by PCB
- Handover: absence of formal transfer process
- Sampling and reporting: high risk of data manipulation
- Inefficient monitoring and lack of capacities for onsite inspections

## Need for a centralised online database !

- Would foster coordination and harmonisation between the agencies
- Would foster the merging of existing databases
- Would enforce a standardised data collection process
- Would allow automated analyses, and data analyses and statistics by all interested agencies, according to their needs
- Would allow very clear monitoring of the progress of SSS at national, State and city level

Database development to be spearheaded by MoHUA or CPCB ? Delegation of platform management to private firms?

# Why WSSBs and ULBs should have a prominent role in SSS

- All wastewater management under one roof
- Inclusion of SSS in the urban planning process
- Full overview of sanitation, and zoning for centralised sewer network, SSTPs and FSM
- Linking SSS to existing building databases and GIS
- Optimisation of water reuse policies, in line with the other urban services

## How feasible is oversight of SSS by WSSBs and ULBs?

#### Monitoring scheme: how it could look like in Bangalore



## **Priority actions**

