



**- POSITION PAPER -**

# **ENVIRONMENTAL SANITATION POLICY OF GHANA:**

**HOW IT SEEKS TO IMPROVE HEALTH & QUALITY  
OF LIFE**

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## **INTRODUCTION:**

In September, 2010, a revised Environmental Sanitation Policy of Ghana was produced. The overall goal of this new policy is to develop a clear and nationally accepted vision of environmental sanitation as an *essential* social service and a major determinant for improving health and quality of life in Ghana. The policy is a necessary tool required to help shape all efforts in dealing with the overwhelming challenges of poor sanitation in Ghana.

While policy makers are seen to be actively working towards a common solution, we contend that the content of the revised policy is weak. Why? The policy makes no express provision for the active involvement of young people in the processes. Arguably, the youth constitute the largest segment influencing the sanitation situation in Ghana. When you consider who engages in: open defecation, generation of e-waste, improper disposal of waste, and indiscriminate littering of streets or environment, young people are the majority. Government's vision or overall objective may not be satisfactorily achieved if youth – a major stakeholder—are continually excluded in all decision making processes.

The Strategic Youth Network for Development (SYND) is a youth-led NGO advocating for sustainable environment (in the areas of Climate Change, Biodiversity, Land Degradation and Water & Sanitation). We are aware of the global convention that youth and women should be involved in all decision-making processes. Therefore, riding on the back of this convention, we subject this new policy to critical analysis from the Youth Perspective and also make recommendations to help achieve common goals and objectives.

From our perspective, key recommendations include:

1. There must be clearly identified capacity gaps. Government does not provide in the policy the baseline or current situation though some capacity building efforts have been embarked upon over the years.
2. There must be regular reports on financial investments and results made in the sanitation sector in a disaggregated format.
3. There must be an unambiguous and strict framework for punitive and incentive measures to encourage acceptable behavioural practices and discourage unhealthy lifestyles. This means laws must be enforced.
4. There must be deliberate inclusion of youth in all decision-making processes in developing, reviewing, planning and/or implementation of Strategies and Action Plans.

The policy mainly focuses on the strategic elements (which are to provide a clearer strategic framework for achieving the overall goal of the sector) under seven policy areas namely:

- Capacity development
- Information, Education and Communication
- Legislation and regulation
- Levels of service
- Sustainable financing and cost recovery
- Research and development
- Monitoring and Evaluation

Government has identified some key challenges and made corresponding responses for each policy area. We therefore take a position on government's perspective.

## A. CAPACITY DEVELOPMENT

### **Our Position: Better training and more information about training programs and targets:**

Government in the policy expressed the need to strengthen institutional capacity. We welcome this position but it will be appropriate for government to provide the specific targeted institutions as well as the kind of capacity required. Interestingly, Page 15 of the Rural Sanitation Model and Strategy (RSMS) of Ghana under Pillar 2: Strengthen Capacity published in March 2012, states that “some capacity building support especially regarding training of district level officials (normally drawn from the District Health Management Team (DHMT), the Environmental Health and Sanitation Unit (EHSU), the District Water and Sanitation Team (DWST) and the School Health Education Program (SHEP) as Community Led Total Sanitation (CLTS) facilitators has been done over the years. In addition, officials in a number of national and regional level institutions including NGOs and private consulting firms have been trained and certified as CLTS Training of Trainers. The number and mix of expertise at the national, regional and district levels is currently not available. In spite of all these efforts, government is unable to provide a baseline or current situation. This is very unfortunate! Nonetheless, a Sanitation Country Profile of Ghana (p5, 2004) states that, *“The Environmental Health and Sanitation Unit of the Policy Division of the MLGRD has 2,240 strong staff stationed in all the 110 MMDAs, ensuring safe, clean and healthy human settlements throughout the country. These staffs are made up of Sanitary Engineers, Environmental Health Technologists, Environmental Health Officers and Environmental Health Assistants. Most of these officers still require some amount of training though, especially in areas like Environmental Health Inspections, Prosecutions, Waste Management, Information Management and Report Writing. There are three Training Institutions namely: Accra, Ho and Tamale Schools of Hygiene which turn out about 150 students per year. These officers are then absorbed by the MLGRD and posted to the MMDAs”*. We think that the formal training institutions do not provide enough graduates. Therefore, there will be a need for in-service training to upgrade knowledge of staff to modern trends.

Again, an essential part of this report agrees that some training is still required to be able to meet set targets. But to what extent has regular (or better still efficient and effective) training been provided?

Even though specific outcomes were not provided, government further stated in Paragraph 644 of the 2011 Budget Statement that the unit (Environmental Health and Sanitation Unit) will continue to build the capacity of MMDAs for improved sanitation services delivery through increased awareness in hygiene and sanitation, and enforcement of sanitation services in MMDAs. This means, since the launch of the policy some strides have been chalked. Government should provide specific details of capacity building including strategies and action plans provided to the MMDAs for this process.

We strongly recommend that government should specify the needed skills, expertise, tools and manpower needed to make positive strides. MLGRD must establish a website to share challenges and difficulties so people with the necessary skills can make their input. In reviewing membership of NESPoCC, can we assume that (new) members would bring special skills, experience, expertise and/or knowledge on board?

## B. INFORMATION EDUCATION AND COMMUNICATION

### **Our Position: Specific strategies, action and sustainability plans for awareness creation exercise**

The government is concerned with enhancing the knowledge, attitudes and practices of individuals, households and communities as partners in improving the standard of living. A key strategy is awareness creation among all stakeholders.

According to Paragraph 817 of the 2009 Budget Statement, “training in Supervisory Management was provided for District Environmental Health officers and waste management staff from 30 Districts and to review waste management monitoring tools. Logistics including vehicles were provided for Western, Eastern, Volta and Brong Ahafo Regional Environmental Offices to enhance their monitoring and supervisory responsibilities”. We therefore call upon government to provide detailed report on the status of this intervention. What has been the impact of the Community Led Total Sanitation (CLTS)

and Sanitation Marketing (SanMark) – targeted at the district level – in the education and information campaign?

SYND supports the call for awareness creation. While creating awareness, developing frameworks, and engaging communities are some of the key interventions indicated in the policy, we are not told the medium by which these can be satisfactorily achieved – in other words, the policy provides no specifics on this. What has been achieved so far over the years in this awareness campaign drive? Which strategy, medium and ideas have been successful in transferring of knowledge and/or technology so as to help in sustaining and replicating it in other sectors or areas? For instance, messages or information targeted at youth may not be appealing or receptive to the aged in society. With youth itself, urban and rural youth have different behavioural lifestyle thus cannot be targeted with same approach.

### **C. LEGISLATION AND REGULATION**

#### **Our Position: Rigid enforcement of existing laws**

SYND believes that non-enforcement of laws is a major challenge crippling all sectors of government institutions and not the absence of laws as the policy seems to portray. Laws are easily crafted and enacted but end up gathering dust. Current legislation governing environmental sanitation in Ghana is redundant. What action has been taken over the years against culprits? We contend that government has performed abysmally in enforcing these laws. While developing, enacting and enforcing legal instruments or legislation is a necessary step to ensuring that all key stakeholders keep a clean environment, we are worried that none of the ‘destroyers’ of the environment have been severely punished by law. Our cities all over the country are engulfed with filth in the full glare of the District, Municipalities and/or Metropolitan Assembly Authorities and yet nothing dramatic has been seen done about that.

The Environmental Health and Sanitation Directorate [ESHD] of MLGRD received full budget allocation of GHC 4 million in 2011 purposely for Hygiene Education and Law Enforcement and yet we are unable to comprehend any enviable success clocked from this investment.

The solution in our view is not about developing or making legislation available or doling out more money but putting wheels under the existing legislation by enforcing them. It is in the process of enforcing existing laws that amendments or review can be envisaged to address new development or trends. How do you develop something new when the old has not been sufficiently tested?

### **D. SUSTAINABLE FINANCING AND COST RECOVERY**

#### **Our Position: Publish financial disbursement in disaggregated format and block all ‘financial waste’ loopholes**

The poor are the hardest hit or most affected by poor sanitation effects; we therefore propose that a lot more should be focused on programs and/or projects that will ameliorate their lives. For instance, rural communities instead of dumping waste indiscriminately can be encouraged to practice ‘source separation’ for the benefit of recycling institutions as well as building compost manure for the farmers as a significant number of Ghanaians are believed to be engaged in agricultural practices. Government in partnership with private sector should also consider converting human waste (excreta) into Biogas for the benefit of rural communities.

According to Paragraph 544 of the 2010 Budget Statement, validation workshops were organised on the Draft National Environmental Sanitation Strategy and Action Plan (NESSAPS) and District Environmental Sanitation and Action Plans (DESSAPS) in all the 10 regional capitals to help improve the environmental sanitation and waste management in the various Districts. This means some financial

commitments or budgetary allocations were proposed in the action plan. We call on government to publish these budgetary allocations in a disaggregated format.

The policy mentions the establishment of the National Environmental Sanitation Improvement Fund which is expected to strengthen the Strategic Environmental Sanitation Investment Plan (SESIP). What is the current status of this Improvement Fund?

Below is a summary of budget allocations to the sector for sanitation and waste management from 2009 to 2012. References are found in the Appendices of 2009 – 2012 Budget Statement Proposals.

Expenditure Budget Proposal (EBP):

MDA/Year	2009	2010	2011	2012
Local Government/Rural Development	24,500,000	15,000,000	20,800,000	60,000,000
District Assemblies & MPs Share	10,000,000	4,000,000	4,938,410	-
Sanitation Guards	-	-	-	27,360,000
<b>TOTAL</b>	<b>34,500,000</b>	<b>19,000,000</b>	<b>25,738,410</b>	<b>87,360,000</b>

SYND observes a decline in the 2010 nominal value and quite a huge allocation in 2012. We would want to know the exact funds disbursed and how they have been used. We also request what explains the big jump in 2012?

We also observe with deep concern that government has failed to meet its commitment according to the Ghana Compact that is, allocating US\$350 million plus 0.5% of GDP annually towards sanitation, water and hygiene improvements as part of meeting MDG targets and beyond. While government moans over the low levels of funds allocation, the Economic Impacts of Poor Sanitation in Africa report published by Water and Sanitation Program (WSP) in March 2012 states that Ghana loses GH¢420 million ANNUALLY due to poor sanitation - though it does not provide details of how the losses occur. We are also not told whether it's due to non-economic tariffs charged for services or unrecovered costs. We find it ironic for government to complain of inadequate funding and yet lose so much annually. Without providing much details, the report further states that open defecation costs Ghana US\$79million per year – yet eliminating the practice would require less than 1 million latrines to be built and used. Government must ensure that such “financial wastes” are nipped in the bud.

**E. LEVELS OF SERVICE**

**Our Position: Provide (at least) specific levels of service at areas where funds have already been provided**

SYND supports government's efforts to widen the scope with respect to meeting increasing waste volumes due to growing economy and varying life-styles. Government must ensure that all players abide by the rules and engagements including choice or location of land sites for refuse dumps. Areas such as Oblogo and Ablekuma have seen residents demonstrating publicly over the use of their community as land sites for waste. These situations need not occur again as the health and well being of each Ghanaian must be protected at least by the State. Government should facilitate the prompt collection, separation and recycling of waste projects from all localities in collaboration with Waste Management and Recycling institutions. We also commend government for taking into account the needs of vulnerable and physically challenged individuals. We are solidly behind government on this score.

We are aware that the Environmental Health and Sanitation Directorate [ESHD] received GH¢ 500,000 in 2011 primarily to promote household latrines in selected MMDAs as well as GH¢ 980,000 in 2012 for Sanitation/Waste Management. We call on government to provide details of these activities including the specific locations within the MMDAs that have benefitted from these disbursed funds.

## F. RESEARCH AND DEVELOPMENT

### **Our Position: Make maximum use of available research data or information while seeking for new findings or development**

SYND overall agrees that research and development is very key to making meaningful impact. We agree that, appropriate institutions must be strengthened (including financing) to consistently provide up to date, reliable and/or accurate data or information. We will also propose that government takes advantage of and use available data or information from institutions (nationally or internationally) researching on similar issues. Again, students pursuing courses around environmental sanitation can be encouraged or motivated to focus on issues of interest in their research or dissertation. We wish to know what has been the outcome of both the Community Led Total Sanitation (CLTS) and the Sanitation Marketing (SanMark) strategy at the district level over the period since the CLTS is expected to drive the policy. Government should consider the need for transfer of technology. If this option has already been pursued, we wish to know the current situation.

## G. MONITORING AND EVALUATION

### **Our Position: Provide specific timelines for policy review**

SYND cannot agree more with government on the need to develop a framework capturing all levels within the sector as a way of giving it a holistic approach. Unfortunately, no timelines for monitoring and evaluation exercises have been provided in the policy. While capacity needs to be strengthened it will be more pragmatic to access or ascertain the current state of monitoring and evaluation in the sector. This we believe will help close any identified gaps in addition to deepening available capacities. Developing a responsive reporting and feedback mechanism for the M&E is inevitable if satisfactory results or outcome are to be achieved. We however are concerned with the fact that, there is no provision of timeline or period for reviewing the policy. We opine that the policy needs a periodic review.

### **CONCLUSION:**

The Revised Environmental Sanitation Policy of Ghana is an impressive guide which has attempted to capture the challenges and made proposals to addressing those challenges in the sector.

We are hopeful that our concerns will be addressed by the appropriate agency. Though no clear responsibility has been assigned to the YOUTH, we strongly proposed that the youth be given equal opportunities to engage actively and make meaningful contribution in the implementation process of this policy. We feel disappointed that the arm of government responsible for youth development – National Youth Authority – was conspicuously missing from the identified Allied Sector Institutions and Functions in the policy.

Environmental Sanitation is a cross-cutting issue (as confirmed on Page 5 under Development Issues of the policy) affecting all shades or parts of human development such as the economy, health, employment, culture etc. and thus must be embraced by all. The policy in Ghana's development agenda is driven by the Growth and Poverty Reduction Strategy (GPRS II) – *now the Ghana Shared Growth Development Agenda (GSGDA)* – which is in itself informed by our commitments to Millennium Development Goals (MDGs), New Partnership for African Development (NEPAD) and above all by the underlying obligations set out in the Constitution of the Republic of Ghana.

We therefore call on all stakeholders such as Donor Agencies, CSOs and the Private Sector to help in the successful implementation of this policy.