

Regulatory reform: raising the standard of pit-emptying services in Kisumu

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In Kisumu, Kenya, pit latrines are the dominant form of sanitation, yet the servicing of these pits has previously been unregulated. This Note outlines the recent introduction of Standard Operating Procedures (SOPs) - led by Kisumu County Public Health Office - which aim to minimise operator and public health risk throughout the emptying and disposal process.

The market for faecal sludge management (FSM) in Kisumu

As Kenya's third largest city, Kisumu offers significant market potential for FSM businesses. Around 75% of the city relies on pit latrines, many of which fill up quickly due to loose soil and a high water table. The County Government of Kisumu does not have adequate capacity to provide FSM services at scale - it has three functional vehicles for transporting faecal sludge, and can only provide services to 10% of the city. This leaves a significant service gap for the private sector to fill. However, until recently, this gap has been filled almost exclusively by informal, small-scale manual pit emptiers, operating illegally and often at night.

Activating the market: the role of regulation and enforcement

The proliferation of informal FSM providers in Kisumu is linked to weak regulation and enforcement, which discourages the private sector from acquiring a formal license to offer safe and professional emptying services. Without regulation to clamp down on illegal practices, formal providers are not positioned to compete with informal providers: the latter can charge lower prices, because they circumvent licencing procedures, and cut corners through unsafe emptying and disposal practices - for example, by dumping sludge in a local watercourse or burying it on site, instead of transporting the sludge to a treatment plant. The result is pronounced negative environmental and public health impacts. Since 2015, WSUP has been working to bridge this gap by supporting a solid waste management business, Gasia Poa, to venture into FSM; and by working



Image: Kisumu, 2014.

in partnership with Kisumu County Public Health Office and Kisumu Water and Sewerage Company (KIWASCO) to create the conditions for safe and professional FSM services to thrive.

A first step: development of Standard Operating Procedures (SOPs)

Targeted capacity development support to Gasia Poa is an important feature of WSUP's response in Kisumu: having signed a formal licensing agreement with the County Public Health Office, Gasia Poa has started pit-emptying in low-income areas of the city - using KIWASCO wastewater treatment facilities to dispose of the sludge - and received support from WSUP in marketing, branding, and financial training and tracking. However, Gasia Poa will not succeed without improvements to the regulatory environment in which it operates, for which the development of the SOPs, led by Kisumu County Public Health Office, are a critical first step. In the current absence of policies and legislation for pit emptying services in Kisumu, the guidelines serve as an interim statement of required standards that are expected to improve and evolve over time. The aim is not to put informal providers out of business, but rather to formalise their services - stimulating fair competition and raising standards all round. The content of the SOPs is outlined on the next page.

SOP guidelines: an overview

The SOPs have been developed to minimise the risks of pit emptying to both operators and the general public. To be effective, the standards would need to be attainable for small businesses: the owner of Gasia Poa and other stakeholders were involved in their formulation, helping to ground the process.

As an initial requirement, the SOPs require that enterprises working in FSM in Kisumu have three licenses: one to operate a business; a license to transport waste issued by the National Environment Management Authority; and a Hygiene and Operational License from the County Public Health Office. In addition, all employees must be immunised against typhoid, Hepatitis B and cholera, have health insurance, and receive training from the County Public Health Office. The SOP also specifies personal safety and emptying equipment, best practice for transporting and disposing of waste in the Nyalenda wastewater treatment plant, and guidelines relating to customer relations and acquisition. The five sections and the components they cover are presented in Table 1.

Effective regulation requires effective enforcement

If effectively enforced, the code will significantly raise the professional standards of pit-emptying in Kisumu, ensure a level playing ground for all FSM businesses to compete fairly, and reduce the health risks of emptying for operators.



Image: Vehicle used by Gasia Poa with safety features and signage.

This transition cannot be taken for granted: training and enforcement must be given due priority for any regulation to be effective. WSUP has provided training to the County Public Health Office to enable the staff to effectively enforce the new standards, and will continue to monitor progress. To support implementation, two checklists have been developed which align with the standards and enable (i) County Public Health Office staff to visit a pit latrine emptying exercise, and examine whether the practices being undertaken meet these minimum operating procedures; and (ii) site supervisors to ensure their own operations comply with required standards.

Table 1: Sections and sub-sections of the SOPs. The full guidelines are available from WSUP on request.

Overall operations	Licensing	Employee health and safety	Personal protective equipment	Emptying equipment
Emptying of waste	Worksite preparation	Sludge removal	Site departure	
Transport	Vehicle requirements	Transport conditions		
Disposal	Waste disposal	Equipment washing		
Customer acquisition	Marketing	Site evaluation	Quotation provision	

Next steps: regulatory reform at the county and national level

The SOPs are an example of meaningful regulatory reforms which have been adopted at the city level. In a highly decentralised country like Kenya, an initial next step is to develop similar codes of practice in other urban centres: for example, WSUP is currently supporting Nakuru County Public Health Office to develop its sanitation management policies and procedures. Significantly, the knowledge and experience gained in enforcing the SOP in Kisumu City is feeding into a Kisumu County Sanitation Policy being drafted by the County Government with support from WSUP, which will potentially influence other counties facing similar FSM challenges in Kenya. It is hoped that in the foreseeable future, this experience in Kisumu will contribute towards the establishment of national FSM regulations in Kenya, mirroring the progress achieved in other countries where WSUP has supported national processes of regulatory reform.

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