

EXECUTIVE SUMMARY

Fresh water is a finite and vulnerable resource, essential to sustain life, development and the environment. Managing the quality and quantity of water is important to sustaining the fisheries resource, reducing the cost of treating domestic water supply and for environmental sustainability, while managing the quantity of water is essential for the health and wellbeing of people, livelihoods and the economy both in the short and the long run. The Directorate of Water Resources Management (DWRM) of the Ministry of Water and Environment (MWE) is mandated through the Water Act (1998) to ensure optimal use of water resources through issuance of permits for abstraction and discharge of water and monitoring compliance with stipulated conditions for water abstraction and discharge.

The objective of the audit was to assess the extent to which the Directorate of Water Resources Management (DWRM) of the Ministry of Water and Environment (MoWE) is regulating the abstraction of water and discharge of wastewater.

KEY AUDIT FINDINGS

It was noted that DWRM had made good strides in ensuring that all abstraction of water and discharge of wastewater activities across the country are regulated through the issuance of permits and subsequent monitoring of permit holders.

However, in spite of the achievements made, the audit identified some areas for improvement as summarized below;-

1. Waste discharge fees and issuance of permits

DWRM levies waste discharge fees based on only the water quality parameter of Biochemical Oxygen Demand (BOD) as a result the fees charged do not take into consideration the other characteristics and components of the wastewater such as heavy metals, oil effluent and other chemicals which are toxic and equally expensive to treat yet the principle behind the waste discharge fees is to ensure that the polluter bears the true and total costs of environmental pollution. This has resulted in DWRM charging fees that do not deter pollution of the water resources by the permit holders; and therefore not meeting their objective of ensuring that water resources are not polluted.

The DWRM takes longer than the timelines stipulated in the MoWE clients' charter to assess applications and issue permits for abstraction and discharge of water which results in unauthorized abstraction/ discharge of water which increases risks for pollution and unsustainable use of water resources.

2. Designation of laboratories for water quality testing

DWRM had not designated laboratories from where testing of samples for water quality by permit holders can be undertaken as a requirement to comply with permit conditions.. Failure to designate credible laboratories may raise questions regarding the credibility of the periodical sample results that are presented to DWRM by the permit holders. It was also observed that the DWRM national laboratory at Entebbe has not yet achieved international accreditation .Without this accreditation, the testing undertaken at the laboratory may not have international credibility.

3. Compliance with Permit Conditions

Some permit holders do not adhere to the permit conditions such as installing facilities for measuring and recording of water levels and water abstraction volumes, submitting water use data to DWRM on a quarterly basis, payment of annual fees and water quality test results for water abstraction. Non-compliance with the permit conditions results in over abstraction of water and discharge of wastewater that does not meet the National effluent standards resulting in pollution.

4. Monitoring by the DWRM

The DWRM has not effectively carried out its monitoring role to ensure compliance with permit conditions as only 50% of the sampled files had been monitored. Monitoring activities are undertaken without documented monitoring guidelines resulting in non-prioritization of those firms that require immediate follow up. It was also noted that there were inconsistencies between the planned and achieved results disclosed in the MoWE Sector Performance Reports and DWRM annual work plans and, consequently, it was not possible to establish the number of permit holders DWRM had planned to monitor and the actual numbers that were monitored for compliance during the period under review. Inadequate monitoring increases chances of non-compliance as illegal practices are left unchecked for long periods of time. This also makes it difficult to assess the impact of DWRM's regulation activities.

KEY RECOMMENDATIONS

The DWRM should:

1. Ensure that the waste discharge fees charged incorporates parameters that impact on pollution as required by Section 18(2) of water regulations 1998; the fees charged should be a deterrent to pollution and adequate to restore the polluted water bodies. Additionally, The DWRM should offer support to permit applicants in order to ensure that their applications include all the required information to hasten the process of assessment and subsequent issuance of permits.
2. DWRM should designate water quality testing laboratories across the country to make

it easier for permit holders to test water quality in fulfilment of permit requirements and to ensure that DWRM receives credible test results from the permit holders. To enhance international credibility of the water testing undertaken by DWRM, the Ministry should continue to pursue international accreditation of its laboratory.

3. Strengthen the enforcement mechanism by taking more stringent actions on non-complaint permit holders, such as, heavy penalties and legal action.
4. DWRM should strengthen the Monitoring function by developing the monitoring guidelines and setting up a proper system for tracking and following up the monitoring activities. Such a system should be able to provide accurate information and reports about the performance of the monitoring function. DWRM should ensure that a consolidated report is prepared periodically on its monitoring activities.