

INTERNAL AUDIT DIVISION

REPORT 2015/116

Audit of waste management in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo

Overall results relating to the effective management of waste in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo were initially assessed as unsatisfactory. Implementation of one critical and two important recommendations remains in progress

FINAL OVERALL RATING: UNSATISFACTORY

2 October 2015 Assignment No. AP2014/620/14

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AUDIT REPORT

Audit of waste management in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo

I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted an audit of waste management in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo (MONUSCO).

2. In accordance with its mandate, OIOS provides assurance and advice on the adequacy and effectiveness of the United Nations internal control system, the primary objectives of which are to ensure: (a) efficient and effective operations; (b) accurate financial and operational reporting; (c) safeguarding of assets; and (d) compliance with mandates, regulations and rules.

3. The Engineering Section is responsible for managing wastewater and non-hazardous waste in the Mission. The Section's Water and Sanitation Unit is responsible for installing, operating, and maintaining wastewater treatment plants and other wastewater management infrastructure. The Facilities and Camp Management Unit is responsible for managing the collection and disposal of non-hazardous waste. The Environmental Unit within the Office of the Deputy Director of Mission Support is responsible for conducting environmental inspections and training. The Chief of the Environmental Unit is the Mission's designated Environmental Officer.

4. MONUSCO had 16 contracts with a not-to-exceed amount of \$1.1 million for sewage and garbage disposal services. The Mission had: (a) installed 12 modular treatment plants for onsite treatment of its wastewater and was in the process of installing another 6 plants; (b) constructed several wastewater infrastructures including 193 septic tanks, 224 soak pits and 51 grease traps; and (c) established 9 laboratories for testing the quality of water from wastewater treatment plants. The Water and Sanitation Unit and the Facilities and Camp Management Unit were headed by staff at the P-3 and FS-5 levels respectively who reported to the Chief of the Engineering Section. The Water and Sanitation Unit had 83 personnel comprising 75 national staff, 6 United Nations volunteers and 2 international staff. The Facilities and Camp Management Unit had 67 staff comprising 55 national staff, 7 United Nations volunteers and 5 international staff. The Chief of the Environmental Unit was supported by two United Nations volunteers and a National Professional Officer.

5. The 2012/13 and 2013/14 budgets for waste management were \$4.0 million and \$3.4 million, respectively.

6. Comments provided by MONUSCO are incorporated in italics.

II. OBJECTIVE AND SCOPE

7. The audit was conducted to assess the adequacy and effectiveness of MONUSCO governance, risk management and control processes in providing reasonable assurance regarding the **effective management of waste in MONUSCO**.

8. The audit was included in the 2014 risk-based work plan of OIOS due to the operational and reputational risks related to waste management in MONUSCO.

9. The key control tested for the audit was regulatory framework. For the purpose of this audit, OIOS defined this key control as the one that provides reasonable assurance that policies and procedures: (a) exist to guide the management of waste in MONUSCO; (b) are implemented consistently; and (c) ensure the reliability and integrity of financial and operational information.

10. The key control was assessed for the control objectives shown in Table 1. One objective shown in Table 1 as "Not assessed" was not relevant to the scope defined for this audit.

11. OIOS conducted this audit from February to April 2015. The audit covered the period from 1 July 2012 to 31 December 2014. The audit team conducted field visits to Mission locations in Kinshasa, Goma, Bukavu, Uvira and Bunia.

12. OIOS conducted an activity-level risk assessment to identify and assess specific risk exposures, and to confirm the relevance of the selected key control in mitigating associated risks. Through interviews and analytical reviews, OIOS assessed the existence and adequacy of internal controls and conducted necessary tests to determine their effectiveness.

III. AUDIT RESULTS

13. The MONUSCO governance, risk management and control processes examined were initially assessed as **unsatisfactory**¹ in providing reasonable assurance regarding the **effective management of waste in MONUSCO**. OIOS made five recommendations to address the issues identified. MONUSCO developed environmental policies and an action plan; regularly reported on its waste management activities; and coordinated with relevant country-level partners on waste management issues. However, MONUSCO needed to: (a) fill the vacant United Nations volunteer post and assign military environmental inspectors to the Environmental Unit; (b) procure additional incinerators and/or make arrangements for all contingent-owned medical facilities without incinerators to dispose of their medical waste at incinerators of other medical facilities; (c) expedite construction of additional soak pits and septic tanks; (d) include in its standard operating procedures on wastewater management all essential tests to be conducted as well as the frequency of such tests; and (e) review contactors' waste disposal sites and practices and ensure recommendations resulting from environmental inspections are implemented.

14. The initial overall rating was based on the assessment of key control presented in Table 1. The final overall rating is **unsatisfactory** as implementation of one critical and two important recommendations remains in progress.

¹ A rating of "**unsatisfactory**" means that one or more critical and/or pervasive important deficiencies exist in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

Table 1:Assessment of key control

		Control objectives					
Business objective	Key control	Efficient and effective operations	Accurate financial and operational reporting	Safeguarding of assets	Compliance with mandates, regulations and rules		
Effective management	Regulatory	Unsatisfactory	Satisfactory	Not assessed	Unsatisfactory		
of waste in MONUSCO	framework						
FINAL OVERALL RATING: UNSATISFACTORY							

Regulatory framework

Need for adequate staff for the Environmental Unit

15. The MONUSCO 2013/14 environmental action plan requires the Environmental Unit to conduct training for all Mission personnel covering issues related to environmental protection and waste management. The action plan expected the Force Commander to second two military environmental inspectors to the Environmental Unit.

16. A review of the process for enrolling staff in training activities and training records maintained by the Environmental Unit indicated that MONUSCO provided: induction training on environmental protection and waste management to civilian personnel; and onsite environmental training to military and police contingents. However, MONUSCO did not deliver a number of planned training sessions related to environmental protection and waste management including: (a) onsite training to military and police contingents at Bunia, Bukavu, Beni and Kisangani; (b) 19 training sessions to military and police environmental focal points and logistics officers; and (c) training to civilian personnel who initially had their induction at Entebbe.

17. The above was partly due to the vacancy in one United Nations volunteer post out of four authorized posts and because the Mission had not allocated military environmental inspectors to the Environmental Unit. As a result, there was an increased risk of Mission personnel not being aware of MONUSCO and United Nations environmental policy, and inappropriately disposing of waste. For example, interview of 110 military personnel indicated that 53 were not familiar with the environmental policy.

(1) MONUSCO should fill the vacant United Nations volunteer post and allocate military environmental inspectors to the Environmental Unit.

MONUSCO accepted recommendation 1 and stated that a United Nations volunteer was appointed and started working in August 2015. The Force Commander had been requested to allocate military inspectors to support the Environmental Unit. Recommendation 1 remains open pending confirmation that military inspectors have been assigned to the Environmental Unit.

Wastewater treatment and disposal systems were operated and maintained by trained personnel

18. The Department of Peacekeeping Operations/Department of Field Support (DPKO/DFS) policy directive on wastewater management requires MONUSCO to use trained personnel to operate and maintain its wastewater treatment and disposal systems.

19. A review of the training records for all eight water and sanitation technicians and interviews with 5 out of 10 wastewater treatment plant operators that operated and maintained wastewater treatment plants in Goma, Bukavu, Bunia and Uvira indicated that they had all been trained on the operations of their plants. The water and sanitation technicians inspected and maintained the wastewater treatment plants weekly and maintained registers for all the wastewater treatment plants. OIOS concluded that MONUSCO had implemented adequate controls to ensure that wastewater treatment and disposal systems were operated and maintained by trained personnel.

There was a need to incinerate medical waste

20. The DPKO/DFS environmental guidelines require MONUSCO to dispose of medical waste by incineration. The Contingent-owned Equipment Manual requires Levels II and III medical facilities to dispose of their medical waste. The Mission is responsible for the disposal of hazardous waste from contingent-owned Level I medical facilities.

21. Visits to 31 out of 75 medical facilities, i.e., all 3 Level II and III facilities, and 28 of the 72 Level I facilities, indicated that all Level II and III facilities disposed of their waste by incineration. However, 14 Level I facilities did not incinerate their hazardous medical waste. Five of these facilities burned their waste in makeshift pits and the other nine mixed their waste with general garbage, which the contractor disposed of at community dumping sites. As a result, there was an increased health risk to the local population and reputational risks for the United Nations.

22. The above resulted as MONUSCO did not have adequate hazardous medical waste treatment infrastructure. For example, 22 of Level I facilities inspected did not have incinerators and 14 of these facilities had not arranged to incinerate their waste at nearby incinerators. The Mission initiated the procurement of incinerators in December 2014; however, the procurement was cancelled in March 2015, due to budgetary constraints.

(2) MONUSCO should allocate resources to procure additional incinerators and/or make arrangements for all contingent-owned medical facilities without dedicated incinerators to have their medical waste incinerated at existing incinerators of other medical facilities.

MONUSCO accepted recommendation 2 and stated that beginning June 2015, all contingent-owned level 1 medical facilities incinerated their medical waste at the nearest incineration facilities. The Mission also procured 4 industrial and 20 smart ash incinerators that were expected to be delivered by December 2015. Recommendation 2 remains open pending receipt of evidence of the installation of incinerators at the respective locations.

There was a need to construct additional soak pits and septic tanks and separate grey and black water

23. The DPKO/DFS policy directive on wastewater management requires MONUSCO to take measures to treat wastewater prior to discharge. MONUSCO standard operating procedures for wastewater management require: (a) black water² to be emptied into septic tanks or wastewater treatment plants and grey water ³ to be diverted to soak pits; and (b) sewage not to be drained out of septic tanks until after a period of at least 12 days to provide sufficient time for adequate anaerobic treatment of fecal waste to deactivate pathogens.

² Black water is water containing fecal matter and urine

³ Grey water is water generated from domestic activities such as laundry, dish washing and bathing

24. Visits to 40 out of 180 sites and interviews with officers responsible for these sites indicated that, as required, the Mission: emptied its black water into septic tanks at all 40 sites; diverted all its grey water into soak pits at 26 sites; drained sewage out of the septic tanks after a period of at least 12 days in 25 sites; and transported sewage from 34 sites to wastewater treatment plants. However, OIOS observation, interviews with staff and review of documents indicated the following: (a) in 14 sites, grey water flowed into the surrounding environment; and (b) at 7 sites, grey water was flowing into septic tanks and therefore, grey water was being mixed with black water, which resulted in septic tanks being drained less than the required 12 days.

25. The above resulted as MONUSCO had not built a sufficient number of septic tanks and soak pits at certain sites. While MONUSCO was taking action and constructing more tanks and soak pits, the condition identified during the audit increased the risk of environmental contamination and health and reputation risks.

(3) MONUSCO should expedite the construction of additional soak pits and septic tanks to control grey water and to ensure grey and black water are adequately separated at all sites.

MONUSCO accepted recommendation 3 and stated that it was in the process of constructing additional septic tanks and soak pits and that separation of grey and black water was completed in Goma, Uvira and Bunia. Recommendation 3 remains open pending receipt of evidence that additional soak pits and septic tanks have been constructed and OIOS verification that grey and black water are being adequately separated.

Need to establish all essential tests of treated wastewater as well as the frequency of such tests

26. The DPKO/DFS environmental guidelines require MONUSCO to conduct tests to monitor the quality of treated wastewater and prescribe the most important wastewater standards to be monitored including: biological oxygen demand, chemical oxygen demand, and suspended solids. The instruction manual for the MONUSCO wastewater treatment systems requires an additional test of alkalinity or acidity to establish the quality of treated wastewater.

27. MONUSCO established nine laboratories at various locations to test and monitor the quality of treated wastewater. A review of 10 out of 36 test results, field visits to 8 out of 12 wastewater treatment plants and interviews with the water and sanitation technicians in charge of these plants indicated that the Mission conducted monthly tests to establish the effectiveness of wastewater treatment based on two parameters, i.e., biological oxygen demand and alkalinity or acidity. The results of the tests indicated that water quality was within the prescribed limits at all locations. However, MONUSCO was not conducting other important tests such as chemical oxygen demand and suspended solids. In all locations except one, treated wastewater was drained to soak pits and in the other, it was reused for irrigation.

28. The above resulted because MONUSCO did not have equipment for testing chemical oxygen demand as the contract for the supply of wastewater treatment systems did not initially require the contractor to provide the required testing equipment. The Procurement Division amended the contract and subsequently in March 2015, MONUSCO procured the equipment. Additionally, the Mission's standard operating procedures for wastewater management did not specify the frequency and the essential tests to be conducted to ensure the quality of treated wastewater.

29. The use of inadequately tested wastewater for irrigation or discharge into the local environment exposed staff and the local population to health risks and MONUSCO to environmental and reputational risks.

(4) MONUSCO should include in its standard operating procedures on wastewater management all essential tests to be conducted as well as the frequency of such tests.

MONUSCO accepted recommendation 4 and stated that it had identified all the essential tests and incorporated them in its standard operating procedures for wastewater management. Starting June 2015, MONUSCO conducted all essential tests and the results in all locations were satisfactory. Treated wastewater was diverted to soak pits in all locations including Bunia which reduced the need for frequent tests. Based on the action taken by MONUSCO and the evidence provided, recommendation 4 has been closed.

Need for improved contractors' waste disposal practices

30. The MONUSCO environmental policy requires the Mission to conduct its operations in an environmentally sound manner to protect the environment and human health. MONUSCO standard operating procedures for facilities and camp management services require the Mission to properly dispose of waste and take it only to appropriately authorized and controlled waste management facilities.

31. Visits to seven waste disposal sites indicated that at five sites MONUSCO waste disposal contractors properly disposed of waste at authorized and well-maintained waste disposal sites. At one site, however, the contractor dumped solid waste at a riverbank, which polluted the water used by the local population for domestic use. At another site, the contractor disposed of solid waste at an unauthorized site. This resulted as MONUSCO did not review, as part of its contractors' performance evaluations, the contactors' waste disposal sites and practices. MONUSCO did not have procedures in place that: addressed in a timely manner recommendations resulting from its environmental inspections; and ensured that contractors complied with their contractual obligations to dispose of waste only at approved disposal sites and in an environmentally safe manner.

32. As a result, there were increased health and environmental risks from polluted water bodies. For example, the environmental inspection of a site conducted by the Environmental Unit and Engineering Section in May 2013 indicated that the sewage dump site in one location posed serious environmental, health and social problems and recommended development of an alternate sewage disposal site. To mitigate some of the risks identified, MONUSCO was planning to close one disposal site and secure another site for solid waste disposal, and was procuring another wastewater treatment plant.

(5) MONUSCO should: review contactors' waste disposal sites and practices, as part of their performance evaluations, to ensure they comply with contractual obligations and take appropriate action; and ensure that recommendations from environmental inspections are addressed.

MONUSCO accepted recommendation 5 and stated that beginning March 2015, it conducted regular inspections at all waste disposal sites and was taking action when contractors did not comply with contractual obligations, including retendering of waste disposal services. To address the 2013 inspection recommendations, MONUSCO had closed one site and installed a plant to treat wastewater. Based on the action taken by MONUSCO and evidence provided, recommendation 5 has been closed.

The Mission regularly reported on waste management activities

33. MONUSCO environmental policy and action plan require the Environmental Unit to: (a) produce site inspection reports based on its assessments and monitoring activities; and (b) prepare an environmental status report at the end of each year. The MONUSCO operating procedures for wastewater management also require water and sanitation technicians to regularly report on the status of the wastewater treatment systems.

34. Interviews with the environment and water and sanitation officers, and review of 60 out of 162 environmental reports indicated that the Environmental Unit had produced: (a) reports for all the site inspections and monitoring activities they conducted; and (b) environmental status reports at the end of each financial year, which reported the progress of implementation of the environmental action plan. The water and sanitation technicians also periodically reported on the status of all the wastewater treatment plants to the Chief of Water and Sanitation Unit. OIOS concluded that the Mission had implemented adequate controls to report on its waste management activities.

Coordination with other entities was satisfactory

35. DPKO/DFS environmental policy requires MONUSCO to liaise with local authorities and relevant United Nations agencies present in the country on environmental and waste management issues.

36. A review of 10 of 20 reports from local authorities and United Nations agencies and interviews with environmental officers indicated that MONUSCO was liaising with relevant entities on initiatives for managing wastewater and organic waste including: (a) coordinating with non-governmental organizations to implement waste recycling in Goma and Bukavu; (b) coordinating with the Ministry of Environment on waste management such as following up on wastewater treatment, infrastructure development and approval of waste disposal sites; and (c) meeting with the government agency on water and sanitation to develop sewage disposal sites.

37. OIOS concluded that the Mission had implemented adequate controls to ensure coordination with other United Nations agencies, non-governmental organizations and local authorities on environmental and waste management issues.

IV. ACKNOWLEDGEMENT

38. OIOS wishes to express its appreciation to the management and staff of MONUSCO for the assistance and cooperation extended to the auditors during this assignment.

(Signed) David Kanja Assistant Secretary-General, Acting Head Office of Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

Recom. no.	Recommendation	Critical ¹ / Important ²	C/ O ³	Actions needed to close recommendation	Implementation date ⁴
1	MONUSCO should fill the vacant United Nations	Important	0	Confirmation that military and police inspectors	31 December 2015
	volunteer post and allocate military environmental inspectors to the Environmental Unit.			have been assigned to the Environmental Unit.	
2	MONUSCO should allocate resources to procure additional incinerators and/or make arrangements for all contingent-owned medical facilities without dedicated incinerators to have their medical waste incinerated at existing incinerators of other medical facilities.	Critical	0	Receipt of evidence of the installation of incinerators at the respective locations.	15 April 2016
3	MONUSCO should expedite the construction of additional soak pits and septic tanks to control grey water and to ensure grey and black water are adequately separated at all sites.	Important	0	Receipt of evidence that additional soak pits and septic tanks have been constructed and OIOS verification that grey and black water are being adequately separated.	31 December 2015
4	MONUSCO should include in its standard operating procedures on wastewater management all essential tests to be conducted as well as the frequency of such tests.	Critical	C	Action taken	Implemented
5	MONUSCO should: review contactors' waste disposal sites and practices, as part of their performance evaluations, to ensure they comply with contractual obligations and take appropriate action; and ensure that recommendations from environmental inspections are addressed.	Critical	C	Action taken	Implemented

¹ Critical recommendations address critical and/or pervasive deficiencies in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

² Important recommendations address important (but not critical or pervasive) deficiencies in governance, risk management or control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

 $^{^{3}}$ C = closed, O = open

⁴ Date provided by MONUSCO in response to recommendations.

APPENDIX I

Management Response

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	MONUSCO should fill the vacant post of United Nations volunteer and allocate military environmental inspectors to the Environmental Unit.	Important	Yes	Chief Environmental Unit, Force Commander and Police Commissioner	31 December 2015	 a. The United Nations Volunteer was recruited and commenced work on 21 August 2015. A copy of the recruitment letter of commitment has been provided to the Resident Auditors. b. Mission Support requested the assistance of the Force Commander and Police Commissioner to provide one military officer and one police officer to support the Environmental Protection Unit. A copy of the request submitted to the Force Commander and the Police Commissioner has been provided to the Resident Auditors.
2	MONUSCO should allocate resources to procure additional incinerators and/or make arrangements for all contingent- owned medical facilities without dedicated incinerators to have their medical waste incinerated at existing incinerators of other medical facilities.	Critical	Yes	Chief Engineer, Chief Procurement Officer, Occupational Health and Safety Officer	15 April 2016	a. As at the beginning of June 2015, all contingent-owned Level 1 medical facilities without incinerators have been incinerating their medical waste at incineration facilities closest to their location, while eight (8) remotely located contingent-owned Level 1 medical facilities are incinerating their medical waste using bio-hazard boxes. The Mission is in the process of creating an Occupational Health and Safety website on the Mission's intranet in which a monthly medical waste incineration form will be placed for documenting the destruction of medical waste. A copy of the incineration

¹ Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

² Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						 schedule currently being followed has been provided to the Resident Auditors. b. The Mission has procured four (4) industrial and twenty (20) smart ash incinerators. These are expected to be delivered by 28 December 2015. These additional incinerators will enable the Mission to provide complete incineration capacity for all hazardous medical waste in all MONUSCO sites. A copy of the Purchase Order with confirmation of the delivery date has been provided to the Resident Auditors.
3	MONUSCO should; (i) expedite construction of additional soak pits and septic tanks to control grey water; and (ii) separate grey and black water, at all sites.	Important	Yes	Chief Engineer	31 December 2015	The Mission has already started the construction of additional septic tanks and soak pits as required and separation of black and grey water in Goma, Uvira and Bunia has been completed. Construction in other locations is on-going. Photographic evidence of each completed site has been provided to the Resident Auditors.
4	MONUSCO should include in its standard operating procedures on wastewater management all essential tests to be conducted as well as the frequency of such tests.	Critical	Yes	Chief Engineer	07 July 2015	 a. MONUSCO has identified all required essential tests and has incorporated them into the Standard Operating Procedure for waste water management. The amended Standard Operating Procedure was approved and implemented on 07 July 2015. A copy of the amended Standard Operating Procedure has been provided to the Resident Auditors. b. As at the beginning of June 2015, the Mission has been conducting all the essential tests and the results have been

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						satisfactory in all locations with waste water treatment plants. Copies of the tests have been provided to the Resident Auditors.c. The treated waste water has been diverted to soak pits in all locations including Bunia. This practice now eliminates the need for frequent waste water quality testing since soak pits are designed to offer tertiary treatment through natural infiltration. Photographic evidence has been provided to the Resident Auditors.
5	MONUSCO should, as part of the periodic performance evaluations of its waste disposal contractors, review contactors' waste disposal sites and practices and implement a mechanism to promptly address recommendations resulting from environmental inspections and ensure that contractors comply with their contractual obligations to dispose of waste only at approved disposal sites and in an environmentally safe manner.	Critical	Yes	Chief Engineer	31 July 2015	 a. Since March 2015, MONUSCO has been conducting inspections at all of its waste disposal sites on a monthly basis. A sample of the Inspection Reports has been provided to the Resident Auditors. b. Based on the findings of those monthly inspections, MONUSCO promptly implements the recommendations and takes action on contractors who are found to be in violation of their contractual obligations. An example of such action is evidenced by a case where a contractor disposed of waste in an unauthorized location. In response, the Mission closed the disposal area and the contract with the contractor was renewed for only three months to allow for a new solicitation of replacement waste disposal services. Documentary evidence of action taken by the Mission has been provided to the Resident Auditors. c. The Mission has taken further action by

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Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						 including stringent waste disposal obligations in Statement of Work for all waste disposal contracts. A copy of the revised Statement of Work has been provided to the Resident Auditors. d. A wastewater treatment plant was installed in Kinshasa and became fully functional on 10 September 2015 to treat all the waste water from MONUSCO sites located in Kinshasa. Documentary evidence of the installation of the new wastewater treatment plant in Kinshasa has been provided to the Resident Auditors. e. The Mission closed the site at Uvira in May 2015 and secured another waste disposal site which conforms to disposal requirements. Documentary evidence of the installation of the new waste disposal site in Uvira has been provided to the Resident Auditors.