

March 8, 2013

To

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**Subject: Comments on MWR's DRAFT HYDRO-METEOROLOGICAL DATA  
DISSEMINATION POLICY (2013)**

Dear Sirs,

We have just seen that the Union Ministry of Water Resources has invited comments by March 31, 2013 on its Draft Hydro-Meteorological Data Dissemination Policy 2013 based on the document available at: [http://mowr.gov.in/DraftHydrometlDataDisseminationPolicy\\_2013.pdf](http://mowr.gov.in/DraftHydrometlDataDisseminationPolicy_2013.pdf). This is indeed a welcome move. Since there has been no publicity of this notice, we assume that the policy has just been put up on the MWR website.

**Preamble** The preamble to the policy should also mention that the National Water Mission of 2008 and the Draft National Water Policy 2012 (final version still not available on MWR website, typical of the MWR functioning) also require transparent data sharing policy.

**Language of draft policy and period of comments** The three week period provided for comments is too brief and the policy is also not available in languages that majority of people of this country speak and understand. This is an issue that is of interest to majority of people of the country. Hence the draft policy should be translated into local languages and disseminated widely before setting a reasonable deadline for inviting comments.

**Unclassified river basins information** The policy should mandate the MWR, CWC, CGWB, India Meteorological Department and all other organisations that are involved in such data collection to put all unclassified hydro-meteorological information promptly in public domain. This is also the requirement implied by the section 4(2) of the RTI act, which the draft policy quotes. United States Geological Society, the agency of USA that is in charge of gathering such data in the US is making this available to the mobile phone users through a publicly available application, see: <http://www.enn.com/ecosystems/article/45658>. The qualification now put in section 6.1 of the draft policy that the information even in unclassified basins only after "after validation and to the extent published in Water Year Book, Water Quality Year Book, Water Sediment Year Book, Ground Water Year Book" is clearly unacceptable. CWC takes years to publish its year books and the information cannot be held secret till CWC and CGWB find time to make their year books public.

About the validation issue, the information promptly put up can say that this is unvalidated information and validated information can be put up after validation. This is even now standard practice adopted by number of agencies like Central Electricity Authority who put up the “tentative” monthly generation reports first and actual reports later on (see: [http://www.cea.nic.in/monthly\\_gen.html](http://www.cea.nic.in/monthly_gen.html)).

**Classified basins information** It is good to see that there is no blanket ban on making public hydro-met information for the classified river basins and there is some application of mind to make some of it public. However, this is still far from sufficient. In the classified basins section, you can say that following categories of data should be made public:

- (1) Data pertaining to any "public interest" project in the basin, public interest being defined as per say the Land Acquisition Act, any project where land is compulsorily acquired;
- (2) Data related to any project that is defined as a public project under the RTI Act;
- (3) Data related to any project being defined as Category A or B1 projects for EIA under the 2006 EIA Notification;
- (4) Data related to any project that requires forest land;
- (5) Data related to any irrigation, drinking water, flood control project and data related to any hydropower project as all of them are supposed to be public purpose projects. All information that is necessary for assessing and understanding cost benefit, social and environment impact assessment of hydropower projects, dams, diversions, information necessary for assessing and understanding disaster management plans including dam break analysis and such kind of information should be in public domain.;
- (6) Data related to any project or intervention that can cause significant impact on the local populations or ecology, and
- (7) Any data or information that is made available to any private developer or commercial interests.
- (8) All information about the water flow at smaller sub basins of the classified basin should be in public domain, as this is very useful for all water related planning, decision making and analysis.
- (9) All information shared with the neighbouring countries should be in public domain.
- (10) Information about functioning of all transboundary cooperation projects, plans and committees should be in public domain.

**Information shared by neighbouring countries** The policy should also make it clear that information shared by the neighbours with India, particularly relevant for people in terms of information related to floods, water flow and water quality etc should also be promptly available in public domain. What is the use of flood forecasting information if it is not available to those who are in the areas that are vulnerable to flood risks that this information is pertaining to?

**Organisations other than CWC and CGWB** There are a large number of organisations besides CWC and CGWB that are also involved in collecting hydro-met information, including IMD, state government, BBMB, NHPC, NEEPCO, SJVN, THDC and private sector hydropower developers. The policy should be pertaining to all such organisations. All information gathered by IMD should be in public domain, in all basins.

**Methods of data collection** In addition to actual data, the methods of data collection should also be available in public domain, so that the information users can also understand the implications of such methods for the accuracy or otherwise of such data. The methods deployed related reports by CWC, CGWB, MWR and others in ensuring the accuracy of the data, including third party evaluation should also be in public domain.

This is a good opportunity to make the functioning of the ministry of water resources also transparent, it would hugely help improve the image of the ministry. The National Water Mission and new Draft National Water Policy also talk about making available all relevant policy and document in public domain promptly. However, this is yet to happen. We hope you will give due consideration to these comments and accordingly change the policy.

Thanking you,

Yours sincerely,

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