To:

1. Union Minister of Water Resources,

Govt of India, Shramshakti Bhawan, Rafi Marg, Delhi 1

minister-mowr@nic.in, psmwr-mowr@nic.in, dey.arijit@nic.in

2. Secretary, Union Ministry of Water Resources,

Govt of India, Shramshakti Bhawan, Rafi Marg, Delhi 1

secy-mowr@nic.in

3. nwp2012-mowr@nic.in

Re: The Hydro Meteorological Data Dissemination Policy - Feedback from India Water Portal

Dear Sirs,

I want to first applaud you all for being forth coming and providing this document that clearly outlines how the Ministry of Water Resources is making a priority out of data dissemination and access to essential information.

In response we have noted some issues and questions that require further examination and explanation. We want to firstly ask that the Ministry of Water Resources to view this as an opportunity to really push for openness and accessibility of their data for the public. The essentialness of water means that there is a great deal at stake and the free sharing of information will allow for better planning and use of this limited resource.

Overall Questions:

Why is this policy is only limited to the CWC and CGWB and not other departments and the India Meteorological Department as well? Will there be further policies for each department released as well?

**3. Classification of Hydro-meteorological Data**

*3.1 From the point of view of data dissemination, the nation can be divided into following three regions;*

*(a) Region-I: Indus basin & other rivers and their tributaries discharging into Pakistan;*

*(b) Region-II: Ganga-Brahmaputra-Meghna basin & other rivers and their tributaries*

*discharging into Bangladesh; and*

*(c) Region-III: Remaining other rivers and their tributaries.*

*3.2 The data of Region-I and II are classified, whereas the data of Region-III is unclassified.*

*The water quality, groundwater and meteorological data for all regions are also unclassified. Similarly, all metadata (information about data, sites, OWs, etc.) for all CWC HO sites and CGWB OWs including yearly average data and historical important data (such as Highest Flood Level, yearly flood peak, etc.) are also unclassified.*

What is the reason that Region I and II are considered classified? The national security parameters have to be explained in full, so that we can understand why essentially half the country is under this category. If this is all publicly collected data, paid for by the Government of India, all of it should be moved to the unclassified category and available for public viewing. Given that a lot of this data is part of publicly funded schemes and projects it is an accountability and transparency issue that it is not available.

Given the description of the data in the previous sections we gather that the data that is deemed classified the below:

(i) River water level (Gauge, G),

(ii) River Discharge (Discharge, D),

(iii) Sediment flow (Silt, S); and

Why is this data in particular placed squarely in the classified category and not groundwater or meteorological? Given the importance of this data in terms of transparency and accountability and given that this area is a major source of water for a huge proportion of the population, is there a way to break down the region and classify smaller areas as high security and others as lower, and make that data available to the public?

*6. Procedure for release of unclassified Hydro-meteorological data & pricing*

*6.1 All unclassified data (after validation and to the extent published in Water Year Book,*

*Water Quality Year Book, Water Sediment Year Book, Ground Water Year Book) shall be hosted on IndiaWRIS website, which can be downloaded by any web-registered user free of cost.*

*6.2 The unclassified data not available on the website can be obtained free of cost from the concerned Chief Engineer of CWC or concerned Regional Director of CGWB after submission of request without any secrecy undertaking. However, costs towards printing, photocopying, digital media, etc., as payable for providing information under Right to Information Act, 2005 would be charged.*

*6.3 All unclassified data may also be obtained as per Right To Information Act, 2005 as amended from time to time.*

Clear process and understanding of how these datasets will be available and in what formats they can be downloaded is required. Formats that are open need to be specified, also will tabular and non GIS formats be available, and at what level? There is little in the policy regarding if all data at every level will be available if it will be organized by watershed, basin, village, district, etc.

Also methodology of how the data was collected, as well as, how timely it is a must. Updated data should be clearly marked with when and over what time frame it has been collected. New data should not be superimposed on top of older data. Also data should not be taken out of the system, the archival policy should be clearly stated. Iterations of the same data must be clearly marked and aggregated. Any changes to methodology or policy should also be clearly stated.

*7.5 The Classified Data Committee shall decide on the requests for release of classified data by 20th of every month, which shall be communicated to the indenting user with copy to the concerned Chief Engineer, CWC by the Director (River Data Directorate), CWC by the end of that month.*

Will there be transparent sharing of what has been requested and why it was denied? Since the granting process of classified data is right now unclear it would be very useful to know what requests are denied and which are granted and for what reason.

Implementation of NDSAP

The National Data Sharing and Accessibility Policy does stipulate that integration with Data.Gov.In is required as proper implementation protocol. This document refers to WRIS but does not specific downloadable, tabular data will be available outside of the WRIS platform for both CWC and CGWB. Will there be sharing of tabular downloadable data with the national platform? How will CWC fulfill this requirement in NDSAP.

META Data and Methodology

It is encouraging to see that the META data will be available, however, a full description of methodology should be available for review as well.

Thank you for your time and attention to this request. Again it is a giant leap forward to have this policy in place. Please let me know if there are any questions regarding any suggestions above.

Sincerely,

Nisha Thompson

Project Manager for India Water Portal the Data Project

nisha@arghyam.org

9620612245