

Comments on the draft National Water Policy

2012

Overall impression

The Government of India's third National Water Policy (NWP) within 25 years, first being in 1987 and the second in 2002, only shows that the two earlier policies failed to deliver the results that were expected. Or else, a new policy was warranted because some drastic changes are required to meet the challenges. It is very strange to note that there was not even any reference to the two previous water policies, let alone a very objective assessment of why they haven't worked. Whatever may be, it should have been explained in the preamble, which as given does not provide any back ground. In the absence of proper back ground note and going by the repeated statements in the text to consider water as an economic good (1.3.vi; 3.3; 7.1) and to price it (7.1; 7.2; 7.5) and asking the State not to be a "Service provider" but a Service Regulator to facilitate water related matters and stating bluntly to transfer all water related services to community and / or private sector with appropriate public private partnership model (13.4) and over and above the suggestion that price fixation for water should follow economic principles (7.), make one wonder, even convinced, however hesitant one is, that the present policy was drafted only to privatise water following the general policy of the Government of India.

General comments:

1. The most important positive provision in the NWP is an assurance of water for life and livelihood, and water required for the sustenance of ecosystems.
2. The most striking negative point is consideration of water as an economic good, to be priced and sold by community/private/private public partnerships.
3. The most conspicuously absent policy statement is the provision for a national programme for the conservation and management for the water resources in the country in totality and, an effective administrative structure to implement it.

4. The most wrongly perceived administrative structure proposed in the NWP is the Institutional structures (13.1; 13.2; 13.3)
5. The most glaring failure of the NWP is the inability to appreciate and recognise the most efficient water harvesting, management and distribution system being successfully organised and rooted in many parts of the country.
6. The most critical reality that is not well realised in the NWP is the indispensability of water for the life support system and under no circumstances can abdicate the responsibility of managing it to the private sectors, especially in a situation where competition for water is intensifying and the many who have no access to water are the poorest of the poor in the country.

A few major suggestions to be incorporated in the Policy

7. **Launching of a National Mission for Restoration of Water Resources:** The vital thrust of any water policy aimed at ensuring water for life and livelihood of the people, should be to ensure the protection of the resource bases of water which include all rivers, streams, rivulets, and wetlands covering, ponds, tanks, lakes and reservoirs. All these resource bases are under great threat. Between 1992 and 2002, the country has lost 38% of its wetlands and, between 1999 and 2010 another 20 lakhs ha. This trend has to be stopped, if the nation has to arrest the increasing water scarcity. Towards achieving it, a National Mission for restoring the entire wetland resource of the country has to be launched immediately. Substantial financial support could be garnered even from the MGNREG project.
8. **Launching a National Wetland Register:** It is a sad state of affairs that the nation still does not have an account of the resource base of its water - without which there could be no life on earth. This may have to be undertaken with utmost priority. Each wetland in the country should be given a Registration Number and its extent and other details should be recorded. Each Panchayath, Municipality

and Corporation must do it involving the State Biodiversity Boards, Biodiversity Management Committees, students and local communities. The Register thus created, the "Nature Capital" would be under the custody of the Panchayath; one officer should be in-charge, who when gets transferred /retired should hand over the Register after field verification to the new incumbent. This will give some accountability of the water resources. As it is today, no one is responsible for the wetlands.

9. **Establishment of a National Wetland and Water Commission (NWWC):** A Constitutional Authority in the lines of the Election Commission has to be created, if the country has to protect its water resources, which stands second to none in priority for the Government. The country never had an effective system/administrative set up to protect and conserve our wetlands. There has been no system with accountability. Hence, probably, is the unabated erosion of outer resources.

***National Wetland and Water Commission** shall ensure : (1) conservation of the entire water resources of the country, which include all wetlands (lakes, tanks, ponds, rivers, streams, rivulets, mangroves, coastal wetlands and man- made water bodies); (2) clean drinking water for every citizen, (3) water for livelihood and food security; (4) resolving all disputes related to water; inter and intra State; (5) allotment of water to various stakeholders, (6) coordination of all activities of stakeholders which are dependent on water .*

Each state will have a State Wetland and Water Commission in the same lines of the State Election Commission and, in the Districts the District Wetland and Water Commission. At the Panchayath level, there has to be an Empowered Committee to oversee the ground work.

Unless we have a set up like this in place, we will not be able to protect our water resources, which are becoming scarce and would become scarcer in the coming days. Importance of water needs to be emphasised; it should be given more importance than for electoral process.

The various administrative set ups suggested in the NWP, such as a "forum at the national level" (13.2), and a permanent *Water Dispute Tribunal* at the Centre will hardly be adequate to address the challenges related to conservation of water resources and equitable distribution of water.

Currently, the country has a Central Wetland Authority under the *Wetlands (Conservation and Management) Rules, 2010*. Chaired by the Secretary, Ministry of Environment and Forests with another 11 members (7 Joint Secretaries from line departments and 4 subject experts), its function is mainly to regulate activities of selected wetlands ; clear / not clear reclamation of wetlands. Being a Government authority, it has its own functional difficulties. Therefore, an authority with the same powers and autonomy as the Election Commission is suggested.

Specific comments and suggestions:

10. Lack of public awareness of water scarcity and economic value of water is the reason for wastage, inefficient use and overexploitation of water (1.1, 1.2.ii)

Comments: This is not fully true, because in a water scarce area, a rich man can still pay high price for filling his swimming pool, fountain, irrigating lawn etc. and a rich farmer can pay high prices and overexploit water for intensive irrigation of cash crops. Wastage in public water supply system is because the users did not participate in the planning particularly choice of technology and as such have no sense of ownership of the system. Lessons have to be learned from community management of water resources and distribution that has been practiced in many parts of the country for a long time.

11. There is an increasing scarcity and unequal spatiotemporal distribution (floods, droughts) of water caused due to climate change (1.1, 1.2.2, 1.2.3, 1.3.10).

Comments: The reason given for increasing water scarcity and unequal spatiotemporal distribution of water cannot be solely attributed to climate change. Most of these phenomena are caused by human intervention such as deforestation, construction of large dams, inappropriate land use and overexploitation of water.

12. The lack of adequate trained personnel for scientific planning, utilizing modern techniques and analytical capabilities incorporating information technology constrains good water management (1.2.xii)

Comments: *This is not correct. The choice of socially, culturally, environmentally, technically and economically inappropriate technology that being followed are the main constrains for good water management. Convincing examples of water management without much expenses and zero damage to biodiversity and environment without much of the technology as practised elsewhere in the country should be emulated (Ralegan Siddhi; Hivre Bazar; WOTR, Pune; Tarun Bharat Sangh, Rajasthan; Samaj Pragati Sahyog, Madhya Pradesh; Sadguru Foundation, Viksat and other NGOs in Gujarat.*

13. Groundwater, though part of hydrological cycle and a community resource, is still perceived as an individual property and is exploited inequitably and without any consideration to its sustainability leading to its over-exploitation in several areas. (1.2.v)

Comments: *Such a perception, even if incorrect, is healthy, because the owner takes good care of his/her ground water . Although ground water certainly is a community resource, enough safeguards are provided in the Indian Easement Act, 1882 to prevent the owner of the property not to misuse it and, also to protect it if someone wants to misuse it.*

14. Planning, development and management of water resources need to be governed by national perspectives on an integrated and environmentally sound basis, keeping in view the human, social and economic needs. (1.3.i)

Comments: *This looks impracticable. Economic needs keep growing with time as human beings demands keep increasing, whereas water availability in any system is "finite" and, with the destruction of forests, wetlands and other resource base of water supply continues to decline.*

15. Water needs to be managed as a community resource held, by the state, under public trust doctrine to achieve food security, livelihood, and equitable and sustainable development for all. (1.3.iv)

Comments: *There has to be clarity here. Water, certainly, is a community resource and it should be owned by the Community itself. It is*

a welcome move. But when it is held by the state under public trust doctrine, apparently to curb mismanagement and overexploitation of water by individual/corporate owners, possibilities are more to take away the right of a community to take right decisions and oppose the wrong political decision on water related interventions. However, the state could give guidelines to the management of the resources but should not be empowered to negate the supremacy of the community and Panchayath.

16. Water, over and above the pre-emptive need for safe drinking water and sanitation, should be treated as an economic good so as to promote its conservation and efficient use(1.3.vi)

Comments: *Water can never be treated as an economic good. Water is a fundamental right of all living organisms which include human being also. Constitution has guaranteed right to life and the Supreme Court has ruled that right to life includes the right for clean air and clean water. Therefore, it cannot be tradable. It is the solemn duty of the Government to ensure water for the life and livelihoods. Further, putting a price tag on water is not a necessary or inevitable condition for water conservation. In an unequal society like India, this may lead to considerable wastage as those who are able to pay for water could use it for totally unnecessary and wasteful end uses.*

17. Water quality and quantity are interlinked and need to be managed in an integrated manner, consistent with broader environmental management approaches inter-alia including the use of economic incentives and penalties to reduce pollution and wastage (1.3.ix).

Comments: *It is a wrong approach. Incentives need not be given to reduce pollution and wastage. Polluter Pay principle provided in the EPA, 1986 should be made as an effective tool to contain pollution. Industries, certainly, are not charitable organisations and they are established with a motive of generating profits. It is therefore their duty to make the effluent zero contaminant before releasing. It is irrational to propose incentives to them.*

18. Such a framework law must recognize water not only as a scarce resource but also as a sustainer of life and ecology. Therefore, water needs to be managed as a community resource held, by the state, under

public trust doctrine to achieve food security, livelihood, and equitable and sustainable development for all. The Indian Easements Act, 1882 may have to be modified accordingly in as much as it appears to give proprietary rights to a land owner on groundwater under his/her land (2.2)

Comments: *The over emphasis of water as a community resource and should be held by the State and then saying that Indian Easement Act, 1882 should be modified, gives an impression that the right over ground water as enjoyed by the land owner today has to be taken out for national interests. It is to be noted that the Indian Easement Act is quite robust and it does not confer any absolute right over the ground water to the owner of the land. On the contrary it gives only a “permission” to use the ground water. More importantly, it prohibits any one causing injury to the neighbours’ ground water resource. Tampering the Act will lead to loss of individual’s “control” and may give unrestricted right to those who want to exploit the ground water. For example: if the Government gives permission for an industry in the “national interest” to be set up adjacent to a land where ground water is available, as per the Indian Easement Act 1882, it could be objected as it is injurious to the water source of the neighbour. It would be a tragedy if the Easement Act, 1882 is tampered.*

19. There is a need for comprehensive legislation for optimum development of inter-State rivers and river valleys to facilitate inter-State coordination ensuring scientific planning of land and water resources taking basin/sub-basin as unit with unified perspectives of water in all its forms (including precipitation, soil moisture, ground and surface water) and ensuring holistic and balanced development of both the catchment and the command areas. Such legislation needs, inter alia, to deal with and enable establishment of basin authorities with appropriate powers to plan, manage and regulate utilization of water resource in the basins. (2.3)

Comments: *There must be a national level, autonomous constitutional authority to coordinate such state level, basin level set ups*

20. Ecological needs of the river should be determined recognizing that the natural river flows are characterized by low or no flows, small floods (freshets), large floods, etc., and should accommodate developmental needs. A portion of river flows should be kept aside to meet ecological needs ensuring that the low and high flow releases are proportional to the natural flow regime, including base flow contribution in the low flow season through regulated ground water use (3.2)

Comments: *Minimum flow concept itself has some inherent weakness. The health of the riverine ecosystems and the environmental services they provide are not certainly related to the minimum flow. In many cases*

excess flow over and above the minimum also has important role in maintaining the ecosystems in a healthy state. Tampering with these amounts to interfering with the natural system. It also depends on the way the minimum flow is calculated. This needs wider consultations. The best option is to have minimum interventions in the river ecosystems

21. After meeting the minimum quantity of water required for survival of human beings and ecosystem, water must be used as an economic good with higher priority towards basic livelihood support to the poor and ensuring national food security.(3.3)

Comments: *The statement is confusing. The second part of the statement means that for the basic livelihood of the poor also, water has to be bought, as water is considered as economic good. This is totally unacceptable.*

22. Further the policy states: “Over and above the pre-emptive uses for sustaining life and eco-system, water needs to be treated as an economic good and therefore, may be priced to promote efficient use and maximizing value from water. While the practice of administered prices may have to be continued, economic principles need to increasingly guide the administered prices”(7.1)

Comments: *This is totally unacceptable. Water cannot be considered as an economic good and sold on the basis of economic principles. This may lead even to non-availability of water to those sections of the society who cannot afford the price fixed. And those who are rich can pay any amount and use it lavishly for house hold as well as for irrigation. Water should be made free for those Below Poverty Line. In the rural India, “pipe and tap” distribution system should be discouraged to the maximum. A massive programme to restore the ponds, tanks, lakes, streams and rivers should be taken up on a war footing to rejuvenate the water resources in the villages.*

23. Community should be sensitized and encouraged to adapt to utilization of water as per local availability of waters. Community based water management should be institutionalized and strengthened (3.5) .

Comments: *Fully agree. Especially the second half of 3.5 that “Community based water management should be institutionalized and strengthened”. This is what exactly the Government must do and the entire water policy should be centred on it. However, “institutionalised” does not mean it should be brought under private, private-public*

partnership. Water resources should be managed only by the local community

24. **Adaptation to climate change:** evolving agricultural strategies, reducing soil erosion and improving soil fertility should be promoted (4.3); adopt compatible agricultural strategies, and cropping patterns (4.4) and, evolve an agricultural system which economizes on water use and maximizes value from water (6.1. a)

Comments: *the policy should specify that agricultural practice which would meet all those requirements mentioned above. We suggest that (a) the nation must resolve to introduce a national organic/ecological farming policy as it requires less water, reduce soil erosion, improve soil fertility, increase productivity and do not do any harm to the biodiversity and above all will not pollute the environment. A time bound policy is required, (b) the government of India should impose a moratorium on GM crops as it requires more water (apart from all other dangers) than the local varieties.*

25. Construction of larger dams are suggested as adaptation to climate change (4.2, 4.5)

Comments: *It may be noted that the futility and negative environmental, economical and social impacts of large reservoirs are already proven through meticulous scientific researches. And, the whole world is shifting from construction of larger dams. While promoting **run** off the river schemes and also check dams, we should completely avoid construction of huge reservoirs.*

26. The availability of water is limited but the demand of water is increasing rapidly due to growing population, rapid urbanization, rapid industrialization and economic development Therefore, availability of water for utilization needs to be augmented to meet increasing demands of water. (5.2)

Comments: *The basic principle that should be accepted is that water is not an "infinite" resource. It is "finite." Therefore the infinite growth of industries, urbanisation and economic development requiring an infinite*

resource is totally irrational and, hence has to have a different approach. The development paradigm itself has to be remodelled to suit the natural resource availability, especially water.

27. Inter-basin transfers are not merely for increasing production but also for meeting basic human need and achieving equity and social justice. Inter-basin transfers of flood waters to recharge depleting ground waters in water stressed areas should be encouraged. If the transfer is from an open basin to a closed basin, increased water use is achieved. Such transfers need to be encouraged (5.5)_____

Comments: *This approach is totally incorrect. The ecological and social impacts of inter-basin transfers are well documented and known. The solution for water stressed areas is that, cultivate what is ecologically feasible and allow only those industries which will not require much water.*

28. Watershed development activities need to be taken in a comprehensive manner to increase soil moisture, reduce sediment yield and increase overall land and water productivity. To the extent possible, existing programs like MGNREGA may be used by farmers to harvest rain water using farm ponds and other soil and water conservation measures (5.6).

Comments: *In addition, for increasing water availability, priority should be given for use of rain water directly; roof top harvesting, percolation tanks, growing food crops requiring less water, recycling wherever possible. The slogan should be "Reduce, Recycle, Re-use".*

29. Recycle and reuse of water, including return flows, should be encouraged to the extent possible (6.3) .

Comments: *This has to be made as a rule, and the industries should be penalised if these rules are not followed strictly*

30. Project financing should be structured to incentivize efficient & economic use of water and facilitate early completion of ongoing projects (6.4).

Comments: *Incentives need not be given to industries which are established only for profit making. But incentives should be given to community management of water resources.*

31. There should be a mechanism in every State to establish a water tariff system and fix the criteria for water charges, preferably on volumetric

basis, at sub-basin, river basin and State level after ascertaining the views of the beneficiary public, based on the principle that the water charges shall reflect the full recovery of the cost of administration, operation and maintenance of water resources projects taking into account the cross subsidy, if any. (7.2)

Comments: *Those below poverty line shall be exempted from tariff and the subsidy shall not be for industries and commercial farming. Local community should be involved in decision making process.*

32. Recycle and reuse of water, after treatment to specified standards, should be encouraged through a properly planned tariff system, in which there is a cost for the quantity withdrawn, a refund for properly treated water returned for reuse, and heavy fines for returning polluted waters. (7.3)

Comments: *While cost for the quantity withdrawn and penalty for returning polluted waters are the right course of action, refund for treating water is not justified. This expense, the expense for treating polluted water, should be borne by the concerned industries.*

33. Heavy under-pricing of electricity leads to wasteful use of both electricity and water. This needs to be reversed. (7.5)

Comments: *Electricity for those in the BPL should be made free of cost, while the quantum of water to be given should be decided per hectare according to the crop. For commercial farming also allotment should be per hectare which should be decided on crop basis.*

34. Preservation of river corridors, water bodies and infrastructure should be undertaken in a planned manner through community participation. The storage capacities of water bodies and water courses and/or associated wetlands, the flood plains, ecological buffer and areas required for specific aesthetic recreational and/or social needs may be managed to the extent possible in an integrated manner to balance the flooding, environment and social issues. (8.1)

Comments: *Not only preservation of the various water bodies but also restoration of the deteriorating and recently filled and, recently converted wetlands for agriculture should be made with a mission mode making use of the MNREGA and other financial sources. This should be done under the proposed National Wetland Restoration Mission which has to be launched with the clear terms that all the wetlands which are destroyed in the immediate past should be brought back into its original condition.*

35. Encroachments and diversion of water bodies (like rivers, lakes, tanks, ponds, etc.) and drainage channels (irrigated area as well as urban area drainage) must not be allowed, and wherever it has taken place, it should be restored to the extent feasible. (8.2)

Comments: *The question is which Ministry/department will be responsible for this? Stakeholders are too many; wildlife, agriculture, fisheries, tourism, electricity departments, rural development, drinking water - to mention a few. Therefore, there must be an independent national authority, the **National Wetland and Water Commission** as proposed under point 8 is to be responsible for the maintenance, protection and conservation of wetlands and, to coordinate and allot water for various stakeholders. The National Wetland Restoration Mission under the National Wetland and Water Commission will be responsible for all the work mentioned done.*

36. Quality conservation and improvements are even more important for ground waters, since cleaning up is very difficult. It needs to be ensured that industrial effluents, local cess pools, residues of fertilizers and chemicals, etc., do not reach the ground water. (8.5)

Comments: *No one would disagree with this. The question is: we already have a Pollution Control Board in each State and at the Central level also. Still what is happening to our waters? Is there any wetland in the country which is not polluted? The current National Water Policy should envisage a stringent mechanism to ensure that industries do not pollute our water and water sources. And, more importantly, the only way to prevent getting the ground water polluted by agricultural runoff, is to switch over to organic farming.*

37. The water resources infrastructure shall be maintained properly to continue to get the intended benefits. A suitable percentage of the costs

of infrastructure development may be set aside along with collected water charges, for repair and maintenance. Contract for construction of projects should have inbuilt provision for longer periods of proper maintenance and handing over back the infrastructure in good condition.(8.6)

Comments: *The concept of huge infrastructure for storing water should be examined in terms of the ecological and social impacts. Community conservation of water bodies should be encouraged.*

38. Legally empowered dam safety services need to be ensured in the States as well as in Centre. Appropriate safety measures should be undertaken on top priority. (8.7)

Comments: *This should be done following the international standards of dam safety.*

39. Being inter-disciplinary in nature, water resources projects should be planned considering social and environmental aspects also in addition to techno- economic considerations in consultation with project affected and beneficiary families. The integrated water resources management with emphasis on finding reasonable and generally acceptable solutions for most of the stakeholders should be followed for planning and management of water resources projects.(9.1)

Comments: *This is not possible unless there is a coordinating agency, as the National Wetland and Water Commission, to get all the stakeholders together to discuss and find out ways and means. Such a Commission is a must to ensure integrated water management which include allotment of water for various sections.*

40. The identification, resettlement & rehabilitation of project affected families shall be given due consideration right at the beginning of the project formulation. In addition to compensation for loss of land, house and sustenance livelihood, the project affected families should be made partners in progress and given a share in the benefits comparable to project benefited families.(10.1)

Comments: *The national policy should be to avoid human habitation for such projects. If it is absolutely essential and there are no alternative to dislocating a minimum number of families, such families should be properly rehabilitated before the project work starts.*

41. There is a need to remove the large disparity between stipulations for water supply in urban areas and in rural areas. Efforts should be made to provide improved water supply in rural areas with proper sewerage facilities. (12.1)

Comments: *In the rural areas, attempts should be taken to see that “pipe and tap” distribution is avoided. Local water resources such as ponds and wells should be restored and strengthened to make the water supply completely decentralised.*

42. Rural areas with endemic ground water quality problems (such as fluoride or arsenic) may be supplied piped surface water. If ground water treatment is done through local systems, the problem of disposing the concentrates should be tackled adequately with due regards to environmental hazards. Another alternative is to improve the quality of ground water through dilution with good quality surface water, wherever feasible. (12.2)

Comments: *The second option is better with efficient water harvesting systems*

43. Urban domestic water supplies should preferably be from surface water. Where alternate supplies are available, a source with better reliability and quality needs to be assigned to domestic water supply. Exchange of sources between uses, giving preference to domestic water supply should be possible. Also, reuse of urban water effluents from kitchens and bathrooms, after primary treatment, in flush toilets should be encouraged. (12.3)

Comments: *Facilities for primary treatment for reuse should be made compulsory and subsidies provided for the same*

44. Industries in water short regions may be allowed to either withdraw only the makeup water or should have an obligation to return treated effluent to a specified standard back to the hydrologic system. Tendencies to unnecessarily use more water within the plant to avoid treatment or to pollute ground water need to be prevented. (12.7)

Comments: *The major culprits causing severe deterioration of quality and quantity of water sources are Industries and commercial establishments such as manufacturing units, industrial farming, tourism industries, education complexes, hospital industry, and apartment complexes. Therefore, no industries/commercial complexes that require large quantities of water should be allowed in water scarce areas. Besides, strict action must be initiated against those industries/commercial complexes violating the effluent treatment standards. Industries should ensure zero pollution before discharge.*

45. Subsidies and incentives should be implemented to encourage recovery of industrial pollutants and recycling / reuse, which are otherwise capital intensive. (12.8)

Comment: *Totally unjustifiable. Industries are, as mentioned earlier, not charitable organisations but are profit making ventures. They are not supposed to discharge polluted water. If they violate the rules, the Polluter Pay principle should come into action. Subsidies shall never be given to industries*

46. A Water Regulatory Authority should be established in each State. The Authority, inter-alia, will fix and regulate the water tariff system and charges, in general, according to the principles stated in this Policy in an autonomous manner. The Authority may also have functions other than tariff systems, such as regulating allocations, monitoring operations, reviewing performance and suggesting policy changes, etc. Water Regulatory Authority in a State may also assist in resolving intra-State water-related disputes. (13.1)

Comments: *The State Water Regulatory Authority in the present structure and functional independence will not be able to provide all that is required of it as mentioned above. It is just like a Government Department and it often fails to coordinate the activities and demands of*

various stakeholders. It needs to have teeth. An ideal structure is given under clause 13.3

47. There should be a forum at the national level to deliberate upon issues relating to water and evolve consensus, co-operation and reconciliation amongst party States. A similar mechanism should be established within each State to amicably resolve differences in competing demands for water amongst different users of water, as also between different parts of the State. (13.2)

Comments: Such a forum also may not work without adequate legal backing. See the structure given under 13.3

48. A permanent Water Disputes Tribunal at the Centre should be established to resolve the disputes expeditiously in an equitable manner. Apart from using the “good offices” of the Union or the State Governments, as the case may be, the paths of Arbitration and Mediation may also to be tried in dispute resolution. (13.3)

Comments on 13.1,2, 3: Such a Tribunal will not be effective as the proposed **National Wetland and Water Commission** (NWWC) or Authority to be established in the same line as the Election Commission; a totally independent, statutory body, as proposed under point 8. Moreover, the NWWC will also look after the water resources including their protection and management which the Tribunal cannot.

49. The “Service Provider” role of the state has to be gradually shifted to that of a regulator of services and facilitator for strengthening the institutions responsible for planning, implementation and management of water resources. The water related services should be transferred to community and / or private sector with appropriate “Public Private Partnership” model. (13.4)

Comments: This is totally unacceptable. Water being one of the vital components of life support system should not be brought under the purview of market forces through privatization. The so called public-private partnership now being pursued is a route for surreptitious privatization. In most countries where privatization of water supply has been attempted, the experience has been unsatisfactory and often disastrous (as in the case of Bolivia, Argentina and Nigeria. In a situation where water is limited, private ventures operating entirely on profitability considerations will increase the prices, directing water supply to those who have the ability and willingness to pay. This is the entire logic of market forces and given the current state of poverty and widening income inequalities, any privatization could have a disastrous social impact. In the current circumstances, regulatory mechanisms are highly ineffective considering weak governance and pervasive corruption. Our experience

of the operation of private sector in the food sector (when millions of people continue to starve while food grains rot) is a classic example of the ineffectiveness of market mechanisms to accomplish social justice. The entire para 13.4 should be deleted. As far as water is concerned which is a fundamental right of all living organisms which include man also, the State should function as “service provider.” This crucial role cannot be assigned to private agencies or even public private partnership. Water cannot be considered just like any other commodity for sale. There are thousands of successful community/user managed systems in India. The difference between such no profit civil society organisations and private companies is to be realised. Moreover, the reasons for private companies participating in water governance are not stated. State cannot run away from the responsibility of ensuring water to every citizen. The state should provide it free of cost to those in the Below Poverty Line and with an upper per capita limit to the rich.

50. An autonomous centre for research in water policy should also be established to evaluate impacts of policy decisions and to evolve policy directives for changing scenario of water resources. (16.4)

Comments: *The relevance of a research institute exclusively for water policy has to be thought of. A National Research Centre for Water Resources is something which is more important. There could be a section/group to analyse and evolve water policies*

Concluding remarks: *It may be noted that most of the points in the policy are only statements of problems/facts; among them a few are without much scientific support. It is suggested that the entire NWP maybe redrafted making it more powerful, working and accountable. To make it a powerful tool, the title could be: “National Water Policies, Strategies and Action Plans “stipulating time limit for each of the action suggested under strategies to implement the respective policy.*

.....