

---

## **UP Water Management and Regulatory Commission (UPWMRC) Act, 2008: Need for Civil Society Attention**

Dr. Subodh Wagle, Mr. Sachin Warghade  
PRAYAS, Pune

---

### **1. Introduction**

Under the rubric of reforms, fundamental, comprehensive, and often, irreversible changes are taking place in almost all economic and social sectors. These changes are predicated on the market-based principles which are accepted as part of the agenda for economic liberalization and globalization. The changes are also affecting governance of water, the most fundamental need of all life. The most disturbing fact is that most of these changes are taking place without adequate and informed public debate. As a result, even irreversible changes, like changes in the legal framework governing water sector, are taking place without the knowledge of either the public or the elected representatives (many laws are passed without adequate debate in the state legislations).

The ‘Uttar Pradesh Water Management and Regulatory Commission (UPWMRC) Act, 2008’ passed recently in the legislative assembly of Uttar Pradesh (UP) is a latest addition to the legal reforms pursued in various states in India in water sector. It was the state of Maharashtra that first enacted a similar law for establishment of ‘Maharashtra Water Resources Regulatory Authority’ (MWRRA) in 2005. Arunachal Pradesh followed suite in 2006 and now Uttar Pradesh has taken the decisive step in 2008. Other states are planning for establishment of similar regulatory authorities in the water sector.

Establishment of a regulatory authority in water sector will have wide ranging impacts on the public interest<sup>1</sup> in the water sector. This present note attempts to give a brief introduction to the new regulatory law in UP and to highlight the major areas of public concern. Since, the UP act draws largely from the Maharashtra law, though with certain crucial differences, a comparison between MWRRA Act and UPWMRC Act is also provided.

### **2. Genesis of UPWMRC Act**

The genesis of UPWMRC Act can be traced to the processes related to market-oriented reforms in the water sector that are underway in different parts of the country. These reforms are guided by the principles of water governance, popularly known as ‘Dublin Principles’, which were articulated and accepted by a participants of the ‘International Conference on Water and Environment’ held in Dublin, Ireland in 1992. One of the ‘Dublin Principles’, states that ‘Water has an economic value in all its competing uses and should be recognized as an economic goal’. The particular principle proposes water to be considered as an ‘economic good’. This perspective to water makes the management and governance of water, amenable to market principles similar to those applied to any other economic goods or commodity. The prescriptions such as ‘privatization’ and ‘full cost recovery’<sup>2</sup> emanates from these market-oriented perspective of water governance.

In the post-globalization era, the national as well as state governments in India are taking forward various market-oriented reform initiatives in water sector. The reforms, which began as part of development projects, are now gradually encapsulating the policy and legal framework for water governance. From the recent changes in the regulatory frameworks in water governance, it is clear that the latest frontier of the reforms is the legal system for water sector in India. Majority of these reforms are driven by the technical and financial support from international aid agencies like the World Bank (WB). New laws like UPWMRC Act and MWRRA Act are poised to change the entire regulatory structure of water governance. Looking at the irreversible and fundamental changes that these legal reforms can bring, it is high time that the citizens and water users groups, which are at the receiving end of these reforms, wakes-up to address the issues of public interest.

### **3. Fundamental Change in Regulatory Framework**

It is important to understand that the establishment of water regulatory authorities or commissions in states likes Maharashtra, UP or Arunachal Pradesh is aimed at establishment of what is called as ‘Independent Regulatory

---

<sup>1</sup> Public interest could be defined as the sum total of the interest of the poor and disadvantaged sections as well as the interest of the society as a whole.

<sup>2</sup> Full cost recovery means, recovery of all costs associated with water services from the water tariff charged to the water users. This typically includes capital as well as operational and maintenance costs including return on investment.

Authority' or IRA. Such IRAs are already established in India, mainly in infrastructure sectors like telecom (Telecom Regulatory Authority of India), electricity (State Electricity Regulatory Commission), and also in service sectors like insurance. The Securities and Exchange Board of India (SEBI) also functions as an IRA in the sector of securities market.

Within the given policy and regulatory framework, these IRAs are supposed to balance two things, viz., (a) interests of the service users, and (b) interests of the market including the private sector players in the market. In doing so, the IRA is expected to ensure that a conducive environment is created for free and fair competition in the sector. To achieve this objective, naturally the IRA should be empowered enough to take decisions and give orders regarding key economic matters like the terms of competition, price of services, distribution of various service or other benefits among various stakeholders. Hence, the IRA is often entrusted with powers equivalent to courts and as such these institutions are quasi-judicial in nature. Due to their quasi-judicial nature and the due to the responsibility of regulation vested on them, these institutions are supposed to be 'independent' in their decision making process. Thus, the assumption is that, by isolating itself from undue political influence, such independent institutions, having sectoral expertise combined with judicial powers, can bring economic efficiency in the sector as a whole.

Before IRA came into existence, the key sector-level decisions are taken by government departments and ministries, thus making the decision amenable to various political influences including genuine politics, vested interest politics and politics related to whims and fancies of particular ruling party or minister. Thus, in effect, the establishment of an IRA leads to transfer of a big chunk of regulatory function from the government departments and ministries to the newly established IRA. This brings in a fundamental change in role of government towards regulating the sector. These changes may have multiple adverse effects such as:

- Complete de-politicization of the crucial public interest issues involved in regulatory functions of the IRA. This may limit the scope for influence on key sectoral decisions through legitimate and just political activism.
- Unaccountable behavior of IRAs, since, IRA is not directly accountable as the government is through electoral process.
- Market capture of IRA, since, the market and market players with their strength of financial and knowledge resources can have higher influence on the techno-centric and judicial proceedings of the IRA. This may lead to reduction in space for raising genuine concerns relating to public interest including the interests of the poor and other disadvantaged sections.

But at the same time, IRAs can also be instrumental in bringing public interest at the center stage of the governance of the sector. For example, the IRAs have the capacity to bring transparency to the otherwise opaque decision making processes in the sector. Similarly, IRAs can play key role in ensuring intensive and meaningful participation of all stakeholders including the marginalized sections of the society. But these gains certainly get shadowed if the law for establishment for IRA does not favor development of effective public control on the regulation of the sector. Also, if the basic framework for governance, especially in life-sustaining sector like water, is totally 'market centric', then it is hard to expect that the IRA will always keep public interest over and above the private interests of the players in the market.

Apart from this fundamental change in the regulatory framework that an IRA brings in a sector, there are other changes that are specific to water sector that the new regulatory laws will bring. These changes are discussed in the following sections of the note.

#### **4. Water Entitlement Regime**

Creation, management and regulation of 'water entitlement system' (WES) is at the heart of the regulatory framework of the IRA in water sectors. As part of the WES, various water users and groups of users shall be allotted certain shares of water as their 'water entitlement'. The UPWMRC and the MWRRA are empowered through the respective legislations to determine and regulate water entitlements to different user groups. UPWMRC Act defines entitlement as, 'any authorization by the Commission to use the water for the specified purpose...' (refer Sect. 2 (h) of UPWMRC Act). MWRRA Act further states that, 'entitlements,...are deemed to be usufructuary rights...' (refer Sect. 11 (i) (i) of MWRRA Act). Water entitlements are certainly not the

ownership rights but they are ‘rights to use’ (in short ‘use-rights’), which are also called as ‘usufructuary rights’<sup>3</sup>. Thus, ‘entitlements’ are legally recognized, registered, (near) perpetual and regulated rights over use of water.

There could be two ways to view this new regime. One way could be that creation of water entitlements regime will ensure rights of water users, especially the rights of poor and disadvantaged sections of society over the use of water resources and shall act as a barrier to monopoly control of the dominant groups in the society over the bulk of the water resources. The second way could be that creation of property use-rights over a share of water will pave way for development of market mechanisms in water sector, similar to the existence of land market. The actual impact of establishing water entitlement regime depends on the finer details of the related regulatory provisions and also the kind of political dynamics that comes into play while implementing the regime.

## **5. Equity in Water Distribution**

The impacts of entitlement regime will depend on the level of cognizance and integration of social policy considerations in the regime such as equitable distribution of water. Both the UPWMRC and MWRRA Act specifically mention in the preamble of the laws that the regulator shall ensure judicious, equitable and sustainable management and allocation of water resources. Thus, the legislations accept ‘equity’ as the key principle that shall guide the allocation of water resources. This acceptance would be expected to lead to equitable distribution of entitlements, thus, making the poor and other disadvantaged sections entitled for due shares of the water use-rights allocated by the regulator.

Except for the preamble of the UPWMRC Act, the term ‘equity’ is not at all mentioned in the legal provisions in the rest of the document of the law. In fact, there has been no attempt to legally define the criteria for ‘equitable allocation’ of water resources. In absence of a practically implementable definition of ‘equity’ the regulator will not be able to implement the principle of ‘equitable distribution’ in practice.

MWRRA Act states that, ‘for equitable distribution of water in command areas of the project, every land holder in the command area shall be given quota’, and that, ‘the quota shall be fixed on basis of the land in command area’ (refer Sect. 12 (6) (a) & (b) of MWRRA Act). Thus, water will be made available to only those people having land in command area and it will be in the proportion of land holding. Hence, in MWRRA Act ‘equity’ is defined in a manner that only includes all landowners in command area of an irrigation project.

Thus, in Maharashtra a vital opportunity is lost to bring into reality an inclusive interpretation of the principle of ‘equity’ as: ‘water to everyone including the landless’. Such legal boundaries on definition of equity are not imposed by UPWMRC Act and there could be an opportunity in UP to evolve a much comprehensive and inclusive definition of ‘equity’ by influencing the rules and regulations that will be prepared for implementation of the law.

The combination of establishing the entitlement regime (legally recognized and perpetual use-rights over water) and the system of allocation of entitlement in proportion to the land owned, will allow the big landlords to gain immense control over water resources that would not only have government sanction but also have legal sanctity. The ‘Water Entitlement System’ with a narrowly defined principle of ‘equity’ may thus lead to emergence of ‘Water Lords’, similar to the existing ‘Land Lords’. This will ultimately reinforce the financial and political clout that the dominant group holds today and would lead to further erosion of space for disempowered sections to assert their rights. The problem gets further accentuated when we explore the linkages between ‘Water Entitlement System’ and the creation of ‘Water Markets’.

## **6. Water Markets**

UPWMRC Act does not include specific provisions for creation of water markets. But there are clear linkages between creation of ‘water entitlement systems’ and ‘water markets’. Hence, the possibility of creation of formal water markets, once the entitlement system is in place, cannot be dismissed.

---

<sup>3</sup> The dictionary meaning of the term ‘usufructuary’ is the right of using and enjoying all the advantages and profits of the property of another without altering or damaging the substance (Webster’s New World Dictionary).

Strategically, creation of legally recognized ‘water entitlement’ could be a pre-cursor to creation of ‘water markets’. Once established, the water entitlements can then be traded within a market system under a sound legal framework.

It is worth understanding the linkages between ‘water entitlements’ and ‘water markets’ from experiences of countries which have already implemented market-oriented reforms in water sector. Water access entitlements, allocations and trading have been key elements of water reforms in Australia. The Australian government defines ‘water trading’ as transactions involving water access entitlements (permanent trading) or water allocations assigned to water access entitlements (temporary trading)<sup>4</sup>. Similarly, in Chile, water use right is treated as a private property independent of land (title) that can be traded, used as collateral, and treated as assets for tax purposes<sup>5</sup>. While the Chilean government grants quantified water rights (entitlements) to all users, an active water market facilitates reallocation of such entitlements both within and across sectors.

Though UPWMRC Act does not provide a clear and direct provision for trading of water entitlements, considering the strong linkage between ‘entitlements’ and ‘markets’, there will be efforts in future to build a market system, once the entitlement system is in place. This concern about creation of formal water markets in India is hypothetical and based just on some remote international experiences. The provisions in MWRRA Act suggest beyond doubt that ‘entitlement regime’ is established for the specific purpose of allowing future allocations of water through market mechanisms.

According to MWRRA Act, the regulator has been accorded the powers to fix criteria for trading of water entitlements on the regulator (refer Sect. 11(i) of the MWRRA Act). Further, the law states that, “entitlements,...are deemed to be usufructuary rights which can be transferred, bartered, bought or sold...within a market system” (refer Sect. 11(i) (i) of the MWRRA Act).

Thus, the scenario of emergence of formal water markets is not just a matter of policy debate, but it has already penetrated into the regulatory framework and received legal sanctions in one of the state in India. There will be every possible attempt to replicate this model of creation of ‘water entitlement system’ and ‘water market system’ across various parts of the country.

The GoUP was wise enough to avoid provision for trading of entitlements, but the same may be given a back-door entry through inclusion of the same in rules and regulations for implementation of the law. A study done on the distributive impacts of water markets in Chile concludes that farmers’ share of water rights decreased significantly after formal water markets backed by the system of property use-rights (entitlements) were introduced. This led to deterioration of their standards of living<sup>6</sup>. Such impacts can be detrimental to the agro-economy and the overall rural economy in India.

## **7. Tariff Regime**

Establishing a tariff system and regulation of the same is one of the key functions of the IRAs. UPWMRC Act as well as MWRRA Act entrust the responsibility of determination and regulation of water tariff to the respective regulatory authorities. The tariff will be determined based on the principle of ‘cost-recovery’. It is necessary to gain critical understanding of the principle of ‘cost-recovery’ and also analyze the implementation of this principle with respect to the ‘levels of cost-recovery’ envisaged in UPWMRC Act and MWRRA Act.

The principle of ‘cost-recovery’ from water tariff emanates from the principle of ‘water as an economic good’. It is argued that water has economic value and hence provision of water services should be accompanied by recovery of cost incurred to provide the services from the users.

It should be noted that, in many parts of India, water charges are based on the (explicit or implicit) criteria of ‘affordability’ for the water users. As a result, at many places, water is being provided free or at highly subsidies

---

<sup>4</sup> Source: Government of Australia, (2005). *Water Access Entitlement, Allocations and Trading*. Australian Bureau of Statistics, Australia

<sup>5</sup> Source: Saleth Maria R, Dinar Ariel, (1999). *Water Challenge and Institutional Response: A Cross-Country Perspective*. World Bank

<sup>6</sup> Source: Romano D, Loporati M, (undated). *The Distributive Impact Of The Water Market In Chile: A Case Study In Limari Province, 1981 – 1997*.

rates to certain areas or populations. And, expenditure for water services were supported using the revenue generated from general taxes. Thus, historically water services were pre-dominantly considered as 'social services' and water was considered as a 'social good'.

The new tariff regime that will be implemented as part of water sector reforms attempts to reverse this principle and replace the same with the principle of water as 'economic good'. There is an emerging consensus that water services should either be run like a business, or become a business<sup>7</sup>. A business-like operation would require 'full cost-recovery' from water tariffs charged to individual consumers. In effect, this requires charging of water services based on the market principles.

Today, most of the states in India have accepted the principle of 'cost recovery' in their 'State Water Policies'. But, there was no formal mechanism to establish the tariff regime based on this principle. This has been achieved by making relevant provisions in the new regulatory laws such as UPWMRC Act and MWRRRA Act, which effectively provide legal sanction to the paradigm shift in the perspective towards economic water services and tariff. Both the laws empower the water regulatory authorities to establish tariff system based on the principle of 'cost-recovery', and to determine and regulate water tariffs.

MWRRRA Act restricts the level of recovery to recovery of operation and maintenance (O&M) cost. Along with O&M cost, UPWMRC Act also provides for recovery of part of capital costs (in form of depreciation). Provision of recovery of capital costs paves way for higher commercialization of the water services. Recovery of capital costs also creates conducive environment for privatization in water sector.

It is necessary to understand that, both the regulatory laws have still not made provision of recovery of return on investments or profits from water tariff. Once this level of recovery is reached, it is argued that, the water sector will be able to attract more and more private investors since there will be a provision for certain percentage of tariff to be collected as profit for the investors. This issue of level of cost recovery defined in the laws (limited to the operation and maintenance cost in case of MWRRRA Act) and privatization of water services is at the cornerstone of one of the petitions filed by PRAYAS before the MWRRRA against the initiative to privatize an irrigation project in Maharashtra<sup>8</sup>.

It is surprising that, UPWMRC Act also makes provision for recovery of cost of subsidy from the water tariffs. Such an attempt will lead to tremendous pressure on the service providers to reduce the subsidy component of the costs to enhance already limited revenue collected from water tariffs.

The discussion on tariff regime suggests that UPWMRC Act seems to be going ahead with the next generation of market-based regulatory reforms. Overall it can be seen that the kind of tariff regime that gets established bears a lot of influence on crucial issues of public interest such as privatization of water services and subsidy to the disadvantaged sections of society.

## **8. Licensing Regime for Water Service Providers**

A major framework-level departure of UPWMRC Act from MWRRRA Act is the provision of licenses to water service providers and thereby regulating the functioning of the various water utilities. Unlike the UPWMRC Act, MWRRRA Act is ill-equipped to regulate water utilities. The UPWMRC is empowered to regulate the procedure and conditions for granting, revocation, and amendment of licenses, the terms, conditions, and procedure for determination of revenues and tariffs, determine standards of services and ensure reporting on standards from the licensees. So UPWMRC Act takes a typical 'utility regulation' approach that exists in other sectors like electricity and telecom. This approach includes not only 'economic regulation' but also 'service regulation'. Hence, UPWMRC Act ushers in next generation of regulatory framework with respect to regulations of water utilities.

---

<sup>7</sup> Source: Kessler Timothy, (2005). *Social Policy Dimensions Of Water And Energy Utilities: Knowledge Gaps And Research Opportunities*. World Bank

<sup>8</sup> Petition filed in Jan 2008 before MWRRRA. The petition was against by-passing of MWRRRA Act and related tariff provision while initiating process of privatization. In its order issued in Nov 2008, MWRRRA directed the proponents of privatization to withdraw the proposal until privatization policy is revised to limit the recovery level to O&M cost and in order to ensure role of the regulator. Details of the petition can be sent on request to PRAYAS (reli@prayaspune.org)

The attempt done in UPWMRC Act to bring in comprehensive (i.e. both economic and service) regulation of water utilities can be seen as a welcome proposition, considering the lackluster performance of water utilities in India. But there is a need to further analyze the linkages between creation of licensing regime in water services and privatization of the services. It is considered that a major step in the privatization and liberalization process in many countries is the issuance of a license to incumbent operators. Thus, there is a need to dwell more into the issues of public concern surrounding the provisions related to creation of licensing regime.

## **9. Planning Regime: Integrated State Water Planning**

Decisions about the location, size and other aspects of new water resource projects have a very close bearing with the development and growth of particular regions. It is one of the most controversial and highly sensitive issues at the regional level. An attempt to bring these decisions under regulatory purview has been done in both MWRRA as well as UPWMRC Act, through the provision for development of a planning regime in the form of 'Integrated State Water Plan' (ISWP).

According to UPWMRC Act, the ISWP shall be developed by the government while the approval to the ISWP will be given by UPWMRC. In contrast to this, MWRRA Act accords the power of approval of ISWP to a committee comprising various ministers while the role of MWRRA is limited to monitoring of implementation of ISWP. Thus, UPWMRC Act envisages next generation of regulation by bringing the planning regime under direct control of the regulator. Delegating highest order powers relating to a crucial development tool like ISWP to an IRA may have detrimental impacts especially those related to the concern of de-politicization of water resource planning. There is an urgent need to articulate and address the concern over loss of public control on the planning of water resources.

## **10. Public Control on Governance of Regulator: Provisions for Transparency, Accountability and Public Participation (TAP)**

Since, the IRA is supposed to be an autonomous body; there are questions of accountability of IRAs. The problem is that the IRAs such as UPWMRC and MWRRA are empowered to take key decisions on water tariff and water distribution but they are not directly accountable to the public. Hence, the only option that remains for exerting public control on the IRA is through ensuring that the process followed by the IRA is transparent, accountable and participatory (TAP). Thus, TAP is necessary requirement for ensuring some level of public control over the decision making process of the IRA.

The comparative analysis of the provisions of the law for establishment of IRA in water sector (MWRRA & UPWMRC Act) with the provisions of law for establishment of IRA in electricity sector (Electricity Act) suggests that the provisions regarding TAP in MWRRA and UPWMRC Act are weaker than their counterpart in electricity sector.

For example, there is no provision in UPWMRC as well as MWRRA Act for 'prior publication' of regulations that will be prepared by respective regulators for implementation of the law. Provision of prior publication makes it mandatory on the regulator to publish the draft regulations before finalizing the same. Thus, availability of draft regulations opens the opportunity for public scrutiny and influence. It is surprising UPWMRC Act does not include the provision of 'prior publication' even in case of rules to be prepared by government for implementation of the law. Such a provision is included in MWRRA Act. Thus, UPWMRC Act neither provides space for public participation in process of formulation of regulations nor for rules.

It is also surprising that MWRRA Act provides space for stakeholder consultation in formulation of tariff regulations, but the same is not included in UPWMRC Act. Thus, UPWMRC Act totally ignores the principle of public participation in regulatory processes.

In case of transparency, the UPWMRC Act seems to be progressive than MWRRA Act because it makes it obligatory on the regulator to issue its decisions, directions or orders accompanied with reasons behind the same (Sect. 10(4) of UP Act). Thus, the UPWMRC will have to disclose the reasons behind each of its decision. But there is a much regressive provision related to transparency in UPWMRC Act, which states that information obtained by commission with respect to any person or business shall be treated as classified and shall not be disclosed by commission without consent of the person or business (Sect. 18 of UP Act), except for information related to tariff. Further, the law also includes a blanket provision making all information in

possession of the regulator to be kept confidential and to be furnished to any person or agency only with the permission of the regulator. These provisions categorized under a separate heading of 'restriction on disclosure of information' are counterproductive to the measures to enhance the transparency of the regulator.

Such lacunas related to TAP resulting into lack of effective public control over the governance of IRAs can potentially lead to un-accountable behavior by IRA and regulatory capture by the vested-interest groups.

### **11. Miscellaneous: Penalties, Cess for Flood Management and Water Conservation**

Apart from the above-mentioned issues, there is a need to look into the public concerns related to other provisions of UPMWRC Act. For example, there is a need to look into the level of penalties envisaged in the law. The UPWMRC Act seems to provide for much stricter and heavy penalties as compared to MWRRA Act. Further, the law also empowers the regulator to impose cess to be charged from owner of lands benefited by flood protection and drainage works implemented under new projects. Such provision would certainly burden the public, especially, the poor farmers.

Considering the failure of State Pollution Control Boards to effectively control the pollution of water resources, the UPWMRC Act envisages concrete role for the IRA in water conservation. MWRRA Act restricts the role of IRA in water conservation by not giving powers to IRA to penalize the polluters. In contrast, UPWMRC Act empowers the IRA to penalize the polluter to the extent of withdrawal of entitlements.

### **12. Need for Evolving Response Strategy by Civil Society**

As discussed in the note, the enactment of UPWMRC Act will have a far reaching impact on the governance of water sector in UP. There are serious issues of public concern that emanates from the change in the regulatory framework in water sector. These issues, if not addressed, can potentially lead to severe erosion of public interest associated with life-sustaining resource like water. Hence, there is an urgent need for social activists, like-minded NGOs, researchers, media persons and other such concerned groups and individuals to evolve appropriate strategies to respond to this new scenario in water sector. The response should be based on more in-depth analysis, articulation and building of critical understanding on the impacts of the new regulatory framework imposed on us.

PRAYAS has been actively engaged in analysis and awareness generation activities related to the establishment of IRAs in water sector in various states in India. Our experience in Maharashtra suggests that the IRA, once established through a law, follow the strategy of very slow and gradual progress initiating regulation in water sector. This 'slow-go strategy' makes it very difficult for the civil society to envisage the real impacts of the new laws and hence there is tendency to overlook the developments and wait till the actual impact is felt with relation to water tariff or distribution. But such 'wait and watch' tendency can lead to loss of vital opportunity to influence the evolving regulatory framework in its formative stages.

Hence, it becomes necessary for the concerned civil society actors to give urgent attention to these developments and start evolving relevant response strategy in the best interest of the public. Activities aimed at wide-scale awareness generation and consensus building could be the starting point of this process.

---

Dr. Subodh Wagle,  
Professor and Dean, IITB-TISS School for Habitat Studies, Tata  
Institute of Social Sciences  
Trustee, PRAYAS  
Group Coordinator, Resources and Livelihoods Group  
Adjunct Professor, CTARA, IIT Bombay  
Email: [subodhwagle@gmail.com](mailto:subodhwagle@gmail.com)  
Phone: 098222 86682

Mr. Sachin Warghade,  
Senior Research Associate,  
Resources and Livelihoods Group  
PRAYAS, Pune  
Email: [sachinwarghade@gmail.com](mailto:sachinwarghade@gmail.com)  
Phone: 098509 16702

*Resources and Livelihoods Group, PRAYAS, B-21, B. K. Avenue, Survey 87/10-A, New D. P. Road, Azad Nagar, Kothrud,  
Pune, 411-038, INDIA Phone: +91-20-25388273, 65615594 Fax: 25388273 e-mail: [reli@prayaspune.org](mailto:reli@prayaspune.org)*

---