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Dr. Mihir Shah,
Chairperson,
Committee on Restructuring the CWC and CGWB.

Subject: Comments on the Report of the Committee on Restructuring the CWC and CGWB

Dear Dr. Mihir Shah, Members of the Committee,

I would like to offer the following comments and suggestions on *the Final Report of the Committee on Restructuring the CWC and CGWB*.

Before going to the actual comments themselves, I would like to place on record our appreciation of the work of the Committee in preparing this report given the difficult and delicate task of suggesting restructuring of organisations that are close to or more than half-a-century old. I would also like to thank the committee for giving me an opportunity to give my inputs as a member of one of the sub-committees. My comments on the Final Report are given below, with the hope that they would help during phase of consideration and implementation of the Report.

1. Powerful argument for the need for change

The Report has argued powerfully and in a convincing manner why a change is necessary at the CWC and CGWB, both, in their structures as well as in their perspectives, approaches and their mandates.

2. Suggestions of the Committee that represent a much needed fundamental change

The changes suggested by the Committee are indeed changes that are urgently needed to the system, changes that are fundamental prerequisites for the organisations to meet the current and future challenges of water resource management and conservation in the country. Some of the suggestions which can be considered as core and most important ones would include:

- A. Unifying the management of surface and ground waters, and indeed water in each and every of its form including soil moisture, vapour etc.
- B. Changing CWC and CGWB from their engineering dominated character to a much more diverse and multi-disciplinary organisation.

- C. Requiring the organisations to be based closer to the river basins, and to restructure their presence river-basin wise.
- D. The mandate given to the proposed National Water Commission to usher in and enshrine a new paradigm of water management.
- E. The new paradigm of water management presented in the Report.
- F. Bringing groundwater management and governance to the forefront, to match the actual role it plays in meeting the country's water needs.
- G. Shift in focus from building and constructing new structures for irrigation to management and maintenance.
- H. Bringing focus and giving importance to river rejuvenation, something that has been long overdue.

3. Some lacunae in the Report and some suggestions

At the same time, we feel that there are some gaps and lacunae in the Report, which we present below, along with some other suggestions.

- A. The most important lacuna in the Report is the absence of a focus on the need to pursue an extensive, decentralised soil and water conservation and rainwater harvesting, groundwater recharging, watershed management program as a means of achieving the goals of conserving water resources and to meet the needs of food security and livelihoods.

We understand that presenting a new paradigm of water management was not the primary objective of the Committee, but the Committee has rightfully dwelt at length on such a new paradigm, since the structure of the proposed NWC is inextricably linked to its functions, and the paradigm that it has to usher in. Given this, any lacunae in the paradigm presented is likely to impact the nature and functions of the proposed NWC.

The need for such a focus on extensive, decentralised soil-water conservation program comes from two important considerations. The Committee has rightfully highlighted as its "*central mandate*" (Page 21) the changes suggested by the Chief Minister of Maharashtra. We quote, from the Report:

"The Chief Minister of Maharashtra remarked that the State has 40 per cent of the country's large dams, "but 82 per cent area of the state is rainfed. Till the time you don't give water to a farmer's fields, you can't save him from suicide. We have moved away from our vision of watershed and conservation. We did not think about hydrology, geology and topography of a region before pushing large dam everywhere. We pushed large dams, not irrigation. But this has to change."

The paradigm of water management that the Committee has presented only partially reflects this suggested change, this central mandate. While the Committee has taken on board the issue of "We pushed large dams, but not irrigation", the point made by the CM that "We have moved away from our vision of watershed and conservation" has been missed by the Committee.

Undoubtedly, the emphasis on ensuring irrigation is crucial, it is not enough. The aim of "*harkhetkopani*" (water to every field) cannot be fulfilled only by "irrigation". As is well known, even with our most valiant effort, large parts of our cultivatable and cultivated lands will remain out of reach of irrigation. Thus, enhancing productivity of dryland and

rainfed farming is critical, and has to be a part of the key objectives. This enhancement of productivity of rainfed farming can come only from a large scale, extensive, soil and water conservation efforts. This is particularly so in light of the “emerging limits to further development in the major and medium irrigation (MMI) sector” as mentioned by the Committee Report itself (Page 33, Sec 1.3.1).

It may be mentioned that only such an effort of large scale, extensive, soil and water conservation can help build up another of our significant water resources – namely soil moisture. While the Report has correctly identified soil moisture as an important resource, the mandate it has given for the NWC does not reflect the efforts needed to conserve and enrich this part of the water resource.

Another important reason for such a program of decentralised soil water conservation is that river rejuvenation – another key mandate of the NWC - cannot happen without such an extensive soil and water conservation program. This is because river rejuvenation critically depends on enhancing groundwater resources. Second, river rejuvenation cannot happen only for the higher order streams represented by the bigger, main stems of rivers; unless the lesser order streams are alive, the higher order streams cannot be rejuvenated.

Last but not the least, it may be pointed out that the draft National Water Framework Law Bill that the Ministry has put out recently also emphasises such a program in its *Basic Principles*. To quote:

“7. People-centred Water Management –(1) People-centred decentralised water management, for both surface and ground water, including local rainwater harvesting, watershed development and participatory irrigation management, shall be prioritised, while recognizing, encouraging and empowering local initiatives.”

Given all this, we would urge that such a program of extensive, decentralised soil and water conservation and rainwater harvesting, groundwater recharging, watershed management be brought in as a key part of the new paradigm of water management proposed in the Report, and a key mandate of the NWC.

- B. The Report does not talk about the need to align cropping patterns with the agro-eco-climatic characteristics of a region. This is critical, because the objective of “*harkhetkopani*” cannot be achieved unless we also talk about the cropping patterns that this water will support. Unless we eschew water intensive cropping in water stressed areas, *harkhetkopani* would simply not work. Such a re-look at water intensive cropping is also necessary to help river rejuvenation, for obvious reasons.
- C. The Report says that “Most large states have developed requisite expertise in the past 2 decades” and mentions institutions like “(BODHI), IIT, Roorkee, CWPRS, Pune, IIT Roorkee, IITs and RECs.” (Page 12). It’s a moot question whether these institutions really reflect the kind of capacities that this Committee talks about. In most cases, these institutions themselves reflect the same limitations that constrain CWC and CGWB – the preponderance of engineering and the lack of other sets of knowledge, skills and understanding.
- D. Page 105 of the Report, in talking about three levels of capacity building, talks about “Grass-root facilitation to a cadre of geo-hydrology workers or *parahydrogeologists*, capable of providing information on the status of groundwater at the aquifer level...”. It would be useful

to have a similar, parallel structure at the watershed level too, for surface water and soil moisture.

- E. The Report mentions(at Page 112, for example), the feedback from the states that delays in techno-economic appraisal by CWC have become a matter of great concern. The Report seems to imply doing away with this process, by, one, pointing out that the states also have developed capacities to do such appraisals, and two, that such appraisal can be "demand-based". However, this may be a case of throwing out the baby with the bath-water. The need for an independent vetting of state projects and their designs – particularly projects on inter-state rivers, or rivers sensitive from ecological or other reasons – is an important part of checks and balances. This is more so because (as pointed out in point C above), the capacities with the states also suffer from limitations similar to ones that CWC and CGWB currently have.

While the need to make appraisals "demand-based" is well-taken, the question remains about what will make the states "demand" such appraisals. While we have no thoughts to offer on this, we would like to point out this important question as one that needs to be addressed.

- F. Since the major water action is at the state level, one of the mandates of the NWC should also be to encourage and help states to move towards the new paradigm of water management that the Report envisages, as also to help restructure state level water departments and institutions along the same direction as the central level NWC.
- G. It may be helpful to explicitly state that the NWC should aim to shift the water management paradigm in the country to the one represented by the (draft) National Framework Law.
- H. One caution to be kept in mind when constituting the NWC is the danger of too much centralisation, unless basin level organisations are deliberately offered more role and powers.

We would like to end by saying that the Report of the Committee represents a very important, much needed change in the current institutional structure of water management in the country, even though it may only be the first step in a long journey.

We will be happy to provide any clarifications with respect to the above comments, or any other inputs from our side.

With regards,



Shripad Dharmadhikary

For Manthan Adhyayan Kendra