

**Technical meeting on the template for reporting on SDG indicator 6.5.2
and under the Water Convention
Budapest, Hungary, 16-17 January 2018
Information document 4**

**OVERVIEW OF COMMENTS RECEIVED ON THE TEMPLATE FOR REPORTING UNDER SDG INDICATOR 6.5.2 AND THE WATER CONVENTION
AND HOW SUCH COMMENTS HAVE BEEN REFLECTED IN THE REVISED TEMPLATE**

Comments on the template for reporting under the Water Convention were received both by Parties to the Convention and by non-Parties, in writing and during discussions at the 12th meeting of the Convention’s Working Group on Integrated Water Resources Management (Geneva, 5-6 July 2017). The Implementation Committee at its eight meeting (23-24 May, Haparanda, Sweden) also discussed the template for reporting under the Water Convention and made a number of proposals for its revision. The table below presents an overview of the comments received as well as a suggestion on how they might be addressed in the revision of the template for reporting under SDG indicator 6.5.2 and under the Water Convention. The revisions to the template are reflected in Information documents 1 and 3.

Comments received	From	Possible response/ solution
A. General comments and observations on reporting and the template		
<i>A.1 The value in reporting</i>		
... the process was really well prepared and due to the high number of replies also a considerable success. The reporting exercise was found to be very helpful to update the detailed information on the legal basis of agreement on which transboundary cooperation is based...	Austria	...
Estonia welcomes the initiation of reporting We believe that it is a beneficial mechanism getting overview of countries efforts in implementing both provisions of the Water Convention as well as to evaluate effectiveness of provisions tackling the issues raised on protection and management of transboundary waters.	Estonia	...
The reporting exercise served as a good opportunity to review all existing agreements and we have realized that what is written in the agreement does not need to be reflected in	Czech Republic	...

reality. As our bilateral agreements are very old and long lasting, the cooperation with our neighbouring countries went much further than what is set in the agreement, much more issues are discussed as it is very easy to establish ad hoc working group than to change the agreement. Involvement of public is raising but that is not reflected in the agreements.		
The process seems reasonably set and we would support the process as proposed.		
All parts of the templates had been in principle rather easy to fill in for Germany and for the transboundary basins we share with other countries.	Germany	...
[Reporting was a] great oppoportunity to fill out the entire template as this supported national coordination, cooperation and data-sharing between different agencies. Helped to identify strong and weak points and gaps remaining to be improved.	Peru	...
Reporting fostered cooperation within departments in the ministries.	Switzerland	...
Luxembourg was rather skeptical, but finally very happy about it. It took more time than expected but it was worth it. Made a small informal consultation with neighbouring countries.	Luxembourg	...
<i>A.2 Use of existing template for next reporting round</i>		
..the existing [national] structure will not change significantly within the coming years – therefore, a future reporting exercpise should make use of the information collected under this reporting exercise and should be focUsed rather on changes in existing agreements which have been reported.	Austria	...
Avoid overlap and simplify in light of answers received from the first report.	France	...
In general we support all sections ... that required to be done for calculation of indicators but with a few comments.	Azerbaijan	...
Generally we are happy with the content and the extent of the templates.	Hungary	...
Generally we can assume that the template itself can serve well the reporting obligations, only slight modification are needed in the templates.		
...we have to continue, but need to keep the answers which we have.	Luxembourg	...
<i>A.3 Length of template</i>		

The reporting template for all the bilateral or multilateral agreements was very technical, very detailed and was partly challenging to be answered due to different interpretations of selected provisions.	Austria	Next reporting will be easier on the basis of the already filled questionnaires. Keeping a similar structure for future reporting will minimize the time required to complete.
[The template] can be simplified – currently it is very bulky and complicated.	Kenya	See response above.
The questionnaire is too exhaustive and applies to countries with different realities, so we suggest that countries that follow European Union legislation should be exempted from filling certain legislative issues and in the alternative such information could be delivered by the European Commission.	Portugal	See response above. Moreover, the obligation to report is a national one. The EU does no report for its Members.
Generally the template for reporting under the Water Convention and for the global SDG Indicator 6.5.2 is build up to give a comprehensive overview of the implementation of the Water Convention and fulfils the purpose of reporting.	Estonia.	...
We have no major comments on the structure of the template, but the volume (extent) of the template can be reduced and simplified. For that, some items or sub-items can be merged. One can consider merging sections I and II, and also sections III and IV and significantly reducing the number of questions in each of them. Some reference data/documents requested in the template (e.g. agreements, legislation, legal acts, etc) would not be changing in the future. Therefore, such questions (if the answers to them were already provided) could be excluded under the condition that if any changes occur to such reference documents in the future - they should be reported. The exception to report such data should also not concern any new Parties to the Convention.	Turkmenistan	See response above.
More possibilities for explanation of answers could be added, which on one hand might make it more complex and difficult to assess, but on the other hand it could also clarify some national processes difficult to answer via tick box.	Czech Republic	Include additional requests for comments where appropriate.
<i>A.4 Presentation and format</i>		
Responses requiring to be typed be separate from those that require ticking in a box.	Kenya	Include clearer signposting for reponses. Consider use of text boxes.
Quite exhaustive questions. However, consider the possibility of putting some related questions into simple matrices and sub-sections	Ghana	Develop more ‘tick box’ answers based on common responses to the initial questionnaire.
Our general comment on reporting is that it would be practical to have an electronic environment for reporting. In our view it facilitates data reporting and also attaching relevant documents. Furthermore, we believe that such an electronic reporting environment would make data processing more easier and quicker.	Estonia	Explore e-reporting possibilities, including cost/benefit analysis.

A.5 Language

There seemed to be some problems in the Russian Language versions of certain questions, which should be addressed in future revisions of the template.	Implementation committee	Review translations.
Some technical parts too general/ vague	Hungary	Refine language, and make vague questions more precise.
We have faced problem with use of “transboundary” and “international” in some of questions, so maybe the wording should be revised in some questions.	Czech Republic	Review wording and proposal to develop a guide to completing the template for reporting under the Water Convention.

A.6 The need for additional guidance to support reporting

A glossary would greatly facilitate the understanding of the requests and avoid different interpretations.	France	Proposal to develop a guide to completing the template for reporting under the Water Convention, which would include a definition of key terms.
We feel we need a more exact guidance/ clarification especially for the II and III section.	Hungary	See response above.
The discussion in the last IWRM group meeting of the Water Convention made clear that understanding the questionnaire differs among Parties and non-Parties. Terms are not understood in the same way in the world. It might be necessary to have a detailed glossary in the updated template. And it might not be easy to find agreed definitions for every terms. For some basins there had been an exchange among relevant countries which made obvious that some questions were not understood by all in the same way. E.g. the term “regulation” is interpreted differently if the person who answered the questionnaire had been a lawyer or an engineer. We had no time to compare the nationally answered questionnaires in the basins concerning all details with the effect that the countries answered questions partly differently concerning the same basin and the same joint bodies. I am not sure if this is taken into account when evaluating the reports and also on the basis of this evaluation for the update of the template. You might have a better overview on diversity of answers concerning the same basin as we as single countries.	Germany	See response above.

A.7 Process and co-ordination with other countries

Different views have been solved by sharing of the draft reporting templates between concerned parties what was very helpful to agree on common views about the existing	Austria	...
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agreements and to streamline reporting, was was also a support to the other countries (especially concerning multilateral agreements); however due to the exchange between the parties the exercise was considerably more time-consuming than initially anticipated.		
In the case of section II and II it is envisaged to consult with the neighbouring country, but it is also had some limitations. We agreed with the neighbouring countries tha the majority of the information should be harmonized, but there could be differences as well.	Hungary	...
Draft reports could not be discussed between European countries participating in the same agreements due to time constraints	France	Allow more time for reporting and encourage countries to exchange at the basin and regional level, including within meetings under the Convention
It would also be useful for the Secretariat of the Convention to provide spaces for dialogue before or after the information was sent in order to compare what the countries of the region reported, because it is a reality that we do not know what and how our neighbouring countries reported. In case the information does not match, a mechanism to reconcile the differences should be established.	Columbia	Encourage countries to discuss their reports.
We have cooperated with some neighbouring countries when filling out the questionnaire and we have find out that in some of question we have to keep a different answers due to different national processes or different understanding of the question. ... The reporting template was in the Czech Republic consulted with focal points or secretaries of all commissions and international conventions mainly on clarifying the understanding of some provisions as well as national procedures.	Czech Republic	...
<i>A.8 Difficulties encountered</i>		
Time constraint – it was not easy to bring together different actors or gather data from those actors within the provided time frame of reporting.	Kenya	Allow more time for reporting. But for subsequent rounds, the exercise should be less time consuming.
Some reports however focus the information provided only on the basins where cooperation is advanced and do not illustrate where the gaps are.	UNECE and UNESCO	The guide to completing the report could address this issue.
<i>A.9 Relationship between SDG6.5.2 reporting and the Convention reporting</i>		

We agree the distinctions were made between the Water Convention's and the SDG's parts as the evaluation should be done separately as the different parts serve different purposes. The transboundary cooperation part is under the convention reflecting the technical forms of cooperation, the SDG section is part of the more broader indicator system (it is only one element of the SDG6 indicator package)	Hungary	...
A.10 Miscellaneous		
Report fits quite well in the framework of the EU directives. A number of requests under the Convention reporting could be covered by requirements related to EU directives. The report could be simplified by referring to the various reports made for monitoring the implementation fo the Directives.	France	In the next reporting round, there would not be any need for such simplication as the information has already been reported. Moreover, the obligation to report is a national one. The EU does no report for its Members.
Water and health issues should be more prominent in the reporting template	Implementation Committee	Questions on human health and water releated diseases added under questions 1a, 2(d) and 3 (e)
Text answers in certain questions provided an oppportunity for explaining in more detail the situation, for example by highlighting achievements and difficulties. However, countries rarely provided extensive replies to these questions.	UNECE	Use more tick box options based on responses to initial reporting exercise. Provide additional opportunities for comment.
We would like to highlight that country reports should be publicly available	Estonia	Reports will be available on the UNECE and UNESCO websites (also in accordance with the relevant Decision of the Meeting of the Parties)
We propose that the periodicity of the reporting cycle is set to 3 or 5 years.	Turkmenistan	Proposal to report every three years in the elements of the draft decision for the Meeting of the Parties
B. Comments on Section 'General information on transboundary water management at the national level'		
General comments		
Generally had no difficulties to fill in as it asking for national implementation on transboundary water management.	Hungary	...
Question 1 (a)		

In our opinion answer to this question should be more descriptive, not only listing relevant regulations. Brief overview should be given on what are the exact measures foreseen in national regulations to prevent, control and reduce any transboundary impact. Only listing national legislations is not enough to get overview of countries actions on these items. Therefore the question should clearly mark the necessity to give brief overview of measures foreseen to prevent, control and reduce any transboundary impact.	Estonia	Revise question to ask for a description of main national laws, policies, action plans and strategies. Also merge with question 1 (b).
Question 1 (b)		
In order to get overview what are the concrete measures that countries have taken and to compare different actions it is important not only to list relevant strategies, action plans and national policies but also to give a brief overview of these instruments. Therefore the question should also clearly mark the necessity to give brief overview of measures foreseen in national action plans to prevent, control and reduce any transboundary impact.	Estonia	Revise question to ask for a description of main national laws, policies, action plans and strategies. Also merge with question 1 (a).
Question 1 (c)		
Answering this question it is not enough to mark “yes” or “no”, but it would be useful to briefly describe how these principles are set and implemented within country. Therefore in this question it would be useful to also require to briefly describe implementation of these principles.	Estonia	Include additional request to briefly describe how the principles are implemented at a national level.
Question 1 (d)		
Just answering “yes” and listing the sectors is not enough and therefore the question should clearly mark that also a brief overview should be given on licensing and permitting system.	Estonia	Revise to request a brief overview of licensing or permitting system. Include tick box list for sectors.
Question 1 (i)		
Simply providing a list lack sufficient detail to conduct any meaningful analysis.	UNECE Secretariat	Revise question to ask for a description of the most important measures.
Question 2		

<p>It is not clear whether the question is asking about international law obligations or national laws.</p>	<p>Uzbekistan</p>	<p>Revise question to specify that it is asking about national laws, and delete the part on procedures to avoid any confusion and overlap.</p> <p>Add a reference to procedures in the request for more details of the legislative basis.</p>
<p>C. Comments on Section ‘Questions for each transboundary basin, river lake or aquifer’</p>		
<p><i>General comments</i></p>		
<p>We need more exact instruction on which base we have to start. To complete the section for each basin or group them by agreements. We have decided to fill in by transboundary agreements base (including the 7 bi- and one multi-lateral agreements). We have to have a more clear explanations that order to follow. Our proposal would be the following: if the country has transboundary agreement(s) they should reproduce section II for all separately, also the same procedure is suggested for transboundary multilateral agreements. If there is no agreement in force, but other form of cooperation exists (e.g. river commission) it should be reflected also in section II. If there is not any formal agreement, we suggest to fill in the template for each main (primary tributary’s) basin.</p>	<p>Hungary</p>	<p>Proposal to develop a guide to completing the template, which would also include examples of how the questionnaire could be completed depending on particular circumstances, e.g. country with with bi-lateral and multilateral arrangements, country with multiple basins, country with basin and sub-basin arrangements, and country with aquifer arrangements.</p>
<p>Generally, it could be quite confusing in cases where there is more than one agreement (bilateral and multilateral) for a basin and the questionnaire has to be filled for each.</p>	<p>Ghana</p>	<p>As above.</p>
<p>The most common misunderstandings in the filling up of these sections are related to the section on information on each transboundary basin or group of basins (section II in both templates for Parties and other countries). Some countries have grouped together the answers to several basins in which the cooperation is regulated by different agreements or arrangements, or in which the conditions are different, and have tried to reflect the differences in their answers to the various questions in the section. As a result, the replies are not easy to understand and often confused. It is important to adhere to the logic of the template in the preparation of the national report.</p>	<p>UNECE Secretariat.</p>	<p>As above.</p>
<p>Several countries also reported on sub-basins even if this was not explicitly requested, which is very positive and could be further encouraged in the future reporting cycles, as it gives a more accurate picture of the situation, especially in large basins.</p>	<p>UNECE Secretariat</p>	<p>As above.</p>

Most countries understood the usefulness of filling the template also for those transboundary basins where no formal cooperation framework exists yet. However, in other cases, countries preferred to fill out the respective section only for basins with agreements or river basin organizations. This lack of critical approach undermines the quality of the reports and their usefulness.	UNECE Secretariat	As above.
Question 1		
Answer to this question should also give a brief overview for the principles of cooperation applied. Therefore this question should also require giving an overview of the content of cooperation agreement.	Estonia	Rely on question 2(d) which requires countries to explain the topics or subjects of cooperation included in the agreement or arrangement.
Question 2 (a)		
Have an extra part for countries to provide details about what is covered by the agreement. Often countries stated that the whole basin or sub-basin is covered but entered more information on the side.	UNECE Secretariat	Revise to provide for additional explanation.
Question 2(b)		
It wasn't very easy to answer this question as we were not sure if the question is referring exclusively to the provision of the agreement or to the practical work which is being done in the framework of the agreement. It could be the case that aquifers are not explicitly mentioned in the agreement but that in praxis they are however covered. For example when international river basin commissions elaborate their river basin management plans they also cover groundwater bodies even if groundwater isn't explicitly mentioned in their agreement. In such cases it isn't clear if the answer to the question should be yes or no.	Luxembourg	Revise question to make it clearer that the aquifers must fall within the scope of the agreement. Consider providing additional guidance in a guide.
Question 2 (c)		
The way questions on water uses were formulated under section II, item 2 (c), did not make it possible to determine whether all relevant water uses were included in the agreement.	Implementation Committee	Add a question that asks countries to explain the main water uses within a basin.

Also owing to a lack of an overview of the main water uses in the basin under section II, question (c), it was difficult to determine coherence with the answers provided under section I, question 2 (d), on the scope of agreements, and under section II, question 3 (e), on the tasks and activities of joint bodies.		
Question 2 (e)		
In order to get a more comparable view of the main difficulties and challenges among countries and/or the different agreements, it could be helpful to add a selection list with tick boxes as very often the difficulties and challenges are the same or at least comparable. The option “other” should be foreseen so that countries can report those difficulties and challenges which are not covered by the selection list.	Luxembourg	Include a tick box list of common challenges – based on responses to the questionnaire.
Question 3 (a)		
There was some confusion over the scope of ‘joint bodies’, and in particular whether it covered bi-lateral working groups that met regularly.	UNECE Secretariat	Consider providing additional guidance based on the definition of joint body included in the guide to implementing the Water Convention.
Question 3 (b)		
Several countries added additional information in order to explain their choice of “yes” or “no”	UNECE Secretariat	Add additional question that states, “If no, what does it cover?”
Question 3 (g)		
Although it might be assumed that a country leaves the question blank because there are no other riparian countries, that is not clear.	UNECE Secretariat	Move question to question 3 (c) above in order to avoid overlap and improve clarity. Specifically ask if any riparian States are not members of the joint body.
Question 3 (h)		

The term 'regularly' may be open to various interpretations. Also, for an arrangement to be considered operational countries are required to meet at least once per year. In some instances, based solely on the responses from countries, it has not been possible to ascertain whether that requirement has been satisfied.	UNECE Secretariat	Be explicit in asking whether the joint body or any subsidiary bodies meet more than once per year, once per year or less than once per year.
Question 3 (j) & 13		
The difference between this question and question 13 which is referring to stakeholders wasn't very clear for us. The difference between these two questions should be made more comprehensive or maybe these two questions could be combined.	Luxembourg	Delete question, and merge with question 13. Include a list of the types of stakeholders that might have observer status and ask countries to tick the relevant ones.
Question 3 (k)		
The question caused considerable confusion as it was not clear whether coastal states that were also riparians and party to an agreement should be listed.	UNECE Secretariat	Revise question to better explain that it is asking about non-riparian coastal States.
Question 4		
The question caused confusion as it was not clear whether both requirements should be satisfied, ie., that a management plan be in place and joint objectives set. Reference to Art. 9(2)(f) is misleading as it does not squarely relate to joint management plans or objectives.	UNECE Secretariat	Separate the question out into two questions, one asking about the management plan, and the other asking about the joint objectives. Also in the guide consider further defining the meaning and parameters of key terms, ie., "joint or coordinated management plan", and "joint objectives". Delete reference to Art. 9(2)(f)
Question 5		
The question could be deleted as it has only limited added value. If the question will remain in the questionnaire it would be helpful to review or rather extend the selection list.	Luxembourg	Add additional options
Question 6		

Information exchange can be very different (by time and space) based on the subject (flood, water quality, etc) under the same agreement which is not reflected well by the template.	Hungary	Revise question 6 (b) to ask about the frequency of data and information exchange (using tick boxes). Invite additional comments at the end of question 6 (b). Include issue of ‘limited spatial coverage’ in question 6 (e), and invite additional comments there.
Add a ‘details’ option after question 6 (a). Many countries have written more next to the “yes”, “no” option.	UNECE Secretariat	See comments above.
Question 6 (e)		
In order to get a more comparable view of the main difficulties and challenges among countries and/ or the different agreements, it could be helpful to add a selection list with tick boxes as very often the difficulties and challenges are the same or at least comparable.	Luxembourg	Include a tick box list of common challenges – based on responses to the questionnaire.
Question 7 (b)		
In order to allow countries to describe more in detail the different options, it could be helpful to add a text field for each option.	Luxembourg	Include text field for each option.
Question 8		
It should be stated in the question that also general overview of assessment methodology must be given in order to get an overview of the assessment procedure and to figure out the status of assessed waterbody	Estonia	Revise question to ask countries to provide information on assessment methodology applied.
Question 9		
In order to get overview of joint or harmonized standards it would be useful that these standards are also listed in answer to this question. Therefore this question should also state that giving these standards in answer is also important.	Estonia	Revise question to ask countries to provide information on national standards.
D. Comments on Section ‘Final questions’		

<i>General comments</i>		
Had no difficulties to fill it in	Hungary	...
It was considered regrettable that the template was structured in a way that did not give sufficient prominence to the overall achievements in and remaining challenges to transboundary water cooperation. It was therefore suggested that the relevant questions now included in section IV be moved to the beginning of the template to provide an introduction and overview to the subsequent section. It was hoped that that would also encourage Parties to elaborate more analytical and comprehensive answers to those questions, which tended to be disregarded in many of the reports.	Implementation Committee	To encourage more detailed responses, include tick box – based on responses to the questionnaire. Most of the countries submitted a report to the pilot exercise. Given the reduced burden of reporting in the next reporting cycles, it is hoped that countries will devote more attention to these questions.
<i>Question IV (4)</i>		
Making more explicit reference to national authorities and agencies consulted in the question on the process of preparation of the reports ... might improve the quality of the replies.	Implementation Committee	To encourage more detailed responses, include tick box lists– based on responses to the questionnaire.