HIGH LEVEL PANEL ON WATER (HLPW)
VALUING WATER INITIATIVE
SOUTH ASIA REGIONAL CONSULTATION

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Dhaka, Bangladesh

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Prepared by the CENTER FOR ENVRONMENTAL AND GEOGRAPHIC INFORMATION SERVICES (CEGIS)

Background

Water, in its eternal nature, has both the ability to create and undo creation. Yet with all its supremacy, it is delicate and therefore, exquisite. From the very beginning and all throughout human existence, water has held a close connection with our lives, our livelihood, and our culture thus ensuring our very survival. But as humankind has flourished over the centuries, we are faced with the harsh realization that water is a scarce resource and, therefore, costly. But that cost cannot be fully appreciated in monetary terms alone. Ensuring the constant availability of this resource for its many uses and users requires tools and institutional reforms to accommodate its smooth transition, over time, from a natural resource to a commodity, a service provider.

The High Level Panel on Water (HLPW) recognizes that global action is critical, and therefore aims to build momentum towards a common vision for a better stewardship of this global resource. The "valuing water initiative" is a direct perception of that vision that aims at building a global consensus to realize the value water and its necessity, not only in terms of money but its mode of utilization, sectors of requirement, spatial and temporal availability, and its overall management; and in doing so, its distribution, storage, and even its pricing. It aims at providing better approaches to valuing water across three critical dimensions – social and cultural, environmental, and economic.

Regional meetings have been organized to evaluate and improve the preamble and principles developed by the HLPW, provide local context, source tools and examples, and seeks inputs and suggestions from a cross-section of stakeholders. To that end, the Regional Consultation Meeting of the "Valuing Water Initiative" in Dhaka, Bangladesh, was held July 31, 2017, at the BRAC Centre. It was a lively meeting with more than 60 professionals from diverse fields of work, mostly from Bangladesh. Some participants came from development partners (World Bank, ADB, etc.), UN agencies (UNICEF), WRG 2030, embassies, and other organizations.

Inaugural Session

The national consultation was initiated by an inaugural session graced by a panel both from home and abroad. In his welcome address, Dr. Khondaker Azharul Haq, President of GWP Bangladesh, stressed the importance of Valuing Water, the rationale and work of the High Level Panel, and the input expected from the participants.

Guest of Honor, H.E. Ms. Leonie Cuelenaere, Ambassador of the Netherlands to Bangladesh, explained more about the concept of valuing water. She stated that water cannot be taken for granted and Bangladesh is playing a crucial role in taking the initiative several steps forward. She mentioned that while water is an important element for the Bangladeshi culture and economy, the country faces water crisis during the dry season even with the many rivers that bring in a substantial volume of water, the bulk of which is during the monsoon driven wet season. She stressed the value of water socially, culturally, economically as well as environmentally, and gave three messages in this regard. First, about avoiding shifting the value of water from one socio-ethnic group to another and having a common language for all to understand the value of water. Second, that the social and environmental value of water should not be overlooked and that more work is required to maintain water as a dignified human right and a healthy ecosystem for future generation. Third, she urged for inputs from the stakeholders from all sectors in further developing principles in valuing water.

Special Guest Ms. Suraiya Begum, Senior Secretary and HLPW Sherpa to the Prime Minister of Bangladesh, emphasized the high value of water in the Bangladeshi context and the lack of generic concerns and consensus of the professionals over this issue. She aso stated that Bangladesh shares common visions on valuing water and has sought valuable inputs from stakeholders.

Chief Guest Mr. Muhammad Nazrul Islam, State Minister, Ministry of Water Resources, in his speech recognized the importance of valuing water for Bangladesh and stressed the need for understanding the impact of climate change and its correlation to water shortages (and becoming more pronounced with every passing year) in the dry season in spite of the huge quantities of water flowing through the country in the wet season. He emphasized the prioritization in allocation of water for various competing sectors and building adequate awareness regarding the proper use of water.

Chair of the session, Mr. Humayun Kabir, Additional Secretary, Ministry of Water Resources, made remarks in his speech on finding the best ways for valuing water by establishing/updating and following such principles that will be applicable for all kinds of common water related issues.

Technical Session 1: Preamble and Principles

The follow up session was divided into two participatory technical sessions that were moderated by Dr. Jerome Delli Priscoli, Chair of the Technical Committee of the Global Water Partnership (GWP) and Mr. Malik Fida A. Khan, Deputy Executive Director (Operations), Center for Environmental and Geographic Information Services (CEGIS) along with support from Mr. Md. Monowar-ul Haq and Mr. Gazi Md. Riasat Amin from the Climate Change and Disaster Management Division, CEGIS.

The first of the two technical sessions started with a presentation from Mr. Willem Mak, Project Manager of the Valuing Water Initiative, who gave an introduction to the overall structure and primary objectives of the HLPW and made direct as well as indirect linkages of valuing water with the SDG goals. He explained the multiple value of water in respect to social, cultural, spiritual, economic, and environmental values and the impact of water quantity and quality as well as its extent on both spatial and temporal dimensions of these values. He stressed the relation between valuing water and the various types of involved stakeholders; how a common water language can act as a binder in uniting all under a common cause in establishing practices of explicit valuation as opposed to the somewhat backdated implicit approach in aiding decision making. He explained how the proper valuation of water can act as the cement in reinforcing IWRM rather than the misconception about replacing it, and that this can play the key catalyst role in transboundary water politics. He concluded by explaining the overall process and stating the objectives of the initiative which involved the strengthening of sustainable water management by providing a set of shared principles and actions.

After the presentation, the moderators explained the steps of the workshop and the participatory/interactive discussions to be held. Cases regarding valuing of water were presented which involved subsiding water for the poor through optimizing the production cost of water.

Formed as a delta at the confluence of the mighty Ganges, the Brahmaputra and Meghna (GBM) river systems and predominantly a flat river floodplain, Bangladesh is heavily dependent on upstream flows and as such, transboundary water issues are significant at a regional scale as it exerts a significant impact on water availability, especially in the dry season. Regional cooperation in this regard has been considered to be of utmost importance through the internationalization of water resources to ensure equitable rights to water use for every stakeholder. As a flat land with an abundance of monsoon flow, flooding is a regular occurrence. But this process has been accelerated and its impacts, magnified by anthropogenic reasons such as the destruction of natural water reservoirs and wetlands for urban development, which can be overcome, to a certain extent, through building storm water reservoirs that can augment seasonal storage.

Emphasis was put on the creational value of water and the need for context specific water valuing through participatory water management including gender issues. Also discussed in this session was the conservation of the environmental value of water and its part in reducing water pollution as well

as increased water use efficiency for crops through smart agronomic practices and pricing of irrigation water.

The participants were divided into small table groups where each group consisted of a spokesperson for relaying the cumulative messages of the group. Discussions were held on how to add further value and in doing so, enrich the current set of principles and preambles and also add a local flavor as water related issues vary from one hydrological as well as hydro-political setting to another. The discussion was lively and fruitful in that no less than 30 suggestions came from the participants on (**Appendix D**). The major ones are discussed here:

- The primary concern for Bangladesh in its hydrological and hydro-political setting is transboundary water resources management. Being on the receiving end of 1260 BCM of flow annually from the GBM system, only 7% is generated in Bangladesh. Maintaining this huge monsoon flow and safeguarding its passage into the Bay of Bengal is a momentous task. Upstream interventions made in neighboring countries adversely affect water availability in the dry season and are a major reason for flooding in the wet season. Shared management in the form of river basin organizations is required to ensure regional cooperation.
- Bangladesh houses one of the largest populations in the world, a large portion of whom still live below the poverty line. Actions for safeguarding the availability of drinking water for the disadvantaged are required. Subsidizing water management (or pricing?) to meet these needs could prove an effective investment in ensuring long term sustainable development.
- Easy access to water has to be ensured for women as it is a significant part of their day to day household activities.
- Water is not only a resource, it is a national infrastructure in that inland transport and navigation is heavily dependent on the availability of adequate draft for safe passage of water vessels. Navigation routes have to be maintained through regular dredging. It is necessary to develop technologies among riparian countries on effective silt management. Bangladesh receives about 1.5 billion tons of silt annually through the transboundary rivers.

Technical Session 2: Actions

After lunch the groups discussed possible actions which resulted in some 30 actions listed in **Appendix E**. Three types of actions were presented:

- Actions for the HLPW, such as organizing consultations for groups really suffering from water related problems (both from too much and too little)
- Actions to be included in the recommendations of the High Level Panel for implementing the principles
- Actions specific to implementing valuing water in Bangladesh

Actions that were decided upon include:

- Develop policies on zero discharge for maintaining e-flow in all rivers throughout the country as well as suggesting the government mainstream the value of water in plans and projects
- Become member/signatory of the UN convention on the law of the non-navigational uses of international water courses and encourage other states to become members
- Regional convergence on the use of the outcomes of plans of actions need to be enforced to support regional cooperation/ transboundary issues through honest brokerage/proactive water diplomacy

- Invite the HLPW members to convince governments in international financing institutions to go beyond setting evaluation criterion for overall water sector proposals, recognizing water as a multidimensional tool as well as resource
- Capacity building/ empowerment by educating farmers to increase irrigation efficiency as well as initiating conversations with marginal people in ensuring safe drinking water for all, keeping provision for ample subsidy, where needed
- Developing methods to make valuation more explicit and useful for advocacy and knowledge gathering through updating macro level planning and transparent incorporation of multiple values of water while ensuring involvement of local government in formulating policies
- Initiatives based more on quantitative analyses as a supplement to qualitative analyses need to be practiced, and processes need to be put in action for rough and ready methodologies as opposed to exhaustive statistical methodologies to aid decision making
- Enforcing regulations on the use of groundwater to harmonize a balance between annual abstraction and recharge. Initiate consultation on transboundary aquifer management.
- Identification of country level platforms for dissemination of outcomes on a common platform to realize long term plans and incorporate them into actions in a national as well as regional context
- An overall follow up framework needs to be developed based on SDG context in creating balance and synergy based on the reinforcement of water allocation rules as well as various applicable compliance mechanisms devised through inter-sectoral conversations and proper and timely dissemination using appropriate media which will also ultimately help in multiplication and scaling up of plans of action to mobilize world leaders into action

Closing Session

Prof. Ainun Nishat, former Vice Chancellor, BRAC University, and a leading expert in the water sector, was asked to give his view on the valuing water initiative and the overall program. Dr. Nishat stressed the need for recognizing the importance of the differences between price, valuation, and valuing. Dr. Nishat emphasized the internationalization of water for achieving global standards and stated that allocation of water based on valuation principles must have provision for considering water as a finite resource, one that is renewable but whose availability can change. He acknowledged the efforts made in the workshop and hoped that an articulated compilation of the outputs would be a significant contribution from Bangladesh.

GWP Executive Secretary Rudolph Cleveringa thanked everyone for their participation and contribution. He observed that the discussion mainly remained within the water 'box' and that for valuing water going out of the box is very important.

Meike van Ginneken, Practice Manager South Asia for the World Bank, made the concluding remarks. Her overall impression was based on the content of and the energy in the discussions. She emphasized that we still have to know better what the message is that we would like to bring across in headline communication of the kind "think globally and act locally" as well as in what "elevator pitch" we should make.

She said that we need a movement for valuing water. It should not stay in multilateral platforms but trickle down to the local level and even more importantly be developed at local scale. She closed by thanking all the participants, hoping that their contribution to this process will continue.

Appendix – A: Programme Agenda

Time	Session description	Responsible
9:00-9:45	Participant Registration & Tea	All
	Inauguration	
09:45-10:30	**Welcome Address: Dr. Khondaker Azharul Haq,** President, Bangladesh Water Partnership **Address by Guest of Honor: HE Ms. Leonie Cuelenaere** Ambassador of Netherlands in Bangladesh **Address by Special Guest**: **Ms. Suraiya Begum** Senior Secretary and HLPW Sherpa to the Hon' Prime Minister of Bangladesh **Address by Chief Guest: Mr. Muhammad Nazrul Islam,** Bir Protik, psc, MP, Honourable State Minister, Ministry of Water Resources **Address by Chairperson: Mr. Md. Humayun Kabir** Additional Secretary,Ministry of Water Resources	
	Technical Session	
10:30-10:40	• Presentation to explain the purpose, expectations and contents of the Valuing Water Initiative exercise being carried out by the HLPW	Mr. Willem Mak
10:40-11:00	• Introduction to Valuing Water Initiative National Consultation	Dr. Jerome Joseph Delli Priscoli
11:00-12:00	**Valuing Water Initiative: Preamble** • *Session introduction* • *Interactive table discussions on the Preamble:* *-Messages from stakeholders to the HLPW on Preamble* *-Additions, subtractions and modifications* • *Plenary discussion of contributions and messages* *Prioritization of key messages*	Dr. Jerome Joseph Delli Priscoli, Global Facilitator And Engr. Mr. Malik Fida Abdullah Khan, National Facilitator
12:00-13:00	**Valuing Water Initiative: Principles** • *Session introduction* • *Interactive table discussions on the Principles:* *-Messages from stakeholders to the HLPW on Principles* *-Additions, subtractions and modifications* • *Plenary discussion of contributions and messages* • *Prioritization of key messages*	Dr. Jerome Joseph Delli Priscoli, Global Facilitator And Engr. Mr. Malik Fida Abdullah Khan, National Facilitator

13:00-14:00	**Lunch Break**	
14:00-15:30	**Valuing Water Initiative: Actions** • *Session introduction* • *Interactive table discussions on how to operationalize the Principles* • *Plenary discussion with breakout group contributions and messages* • *Prioritization of key messages*	Dr. Jerome Joseph Delli Priscoli, Global Facilitator And Engr. Mr. Malik Fida Abdullah Khan, National Facilitator
15:30-16:00	**Tea Break**	
16:00-16:30	• Discussion among participants on results of opinions and reactions	All
16:30-16:45	• Summary of what was heard and how information will be used	Dr. Jerome Joseph Delli Priscoli, Global Facilitator And Engr. Mr. Malik Fida A. Khan, National Facilitator
16:45-17:00	**Closing**	Ms. Meike van Ginneken – World Bank Mr. Rudolph Cleveringa – Executive Secretary, Global Water Partnership

Appendix – B: List of Participants

Sl.	Name	Designation & Organization
1	Rudolph Cleveringa	Executive Secretary, Global Water Partnership GWP Bangladesh
2	Dr. Jerome Delli Priscoli	Global Facilitator, Valuing Water Initiative, GWP
3	Dr. M. Shahab Uddin	Additional Director, Dept. of Agricultural Extension
4	Gazi Md. Riasat Amin	Jr. Consultant, Center for Environmental and Geographic Information Service (CEGIS)
5	M. Asaduzzaman	Distinguished Fellow Bangladesh Institute for Development Studies
6	Meike Van Ginneken	World Bank
7	John Dork	Department of Foreign Affairs, Australian Embassy, Bangladesh
8	Mushfiq Ahmed	Ecologist, CEGIS
9	Md. Ferdous Rahman	Chief Planning, Bangladesh Agricultural Development Corporation (BADC)
10	Malik Fida A. Khan	Deputy Executive Director, CEGIS and National Facilitator
11	Javed Bin Karim	Water Resources Group 2030 / International Finance Corporation
12	Zahir Udding Ahmad	Team Leader Water Resources Management, ADB / Bangladesh Resident Mission
13	Willem Mak	Ministry of Infrastructure and the Environment, Netherlands
14	Md. Monowar-ul Haq	Jr. Specialist, CEGIS
15	Dr. Farhana Sultana	Associate Professor, Syracuse University, New York
16	Md. Ferdousur Rahman	Chief Engineer, BADC
17	Md. Sarafat H. Khan	Former Director General, Water Resources Planning Organization (WARPO)
18	Jemia Grove	Dept. of Water and Sanitation; South Africa
19	Dr. Afzal Hossain	Deputy Executive Director (Planning &Development), Institute of Water Modelling.
20	Md. Mofazzal Hossain	Member, Joint River Commission
21	Mir Sajjad Hossain	Adviser, CEGIS
22	Dr. Md. Nurul Alam	Deputy Director, Department Haor and Wetland Development
23	Abu Saleh Khan	Deputy Executive Director (Operation.), Institute of Water Modelling
24	Engr. Md. Sarwar Hossain	Chief, Minor Irrigation Information Support Unit
25	Shahidul Hassan	Former Chief Engineer of Local Government Engineering Department
26	ATM Khaleduzzaman	Sr. WRM Specialist, WB
27	AKM Shahadat Hossain	Superintending Engineer, LGED
28	Sabrin Reza	Executive Director. Sigma Group
29	Dr. Nilufa Islam	Vice President of GWP Bangladesh
30	Begum Shamsun Nahar	Coordinator, Bangladesh Women and Water Network
31	Dr. M. A. Rashid	Former Chief Scientific Officer & Head, Department of Irrigation and Water Management, Bangladesh Rice Research Institute

32	Mirza Md. Mohiuddin	Senior Assistant Chief, General Economic Division. Planning Commission.
33	Mr. Moshiur Rahman	Secretary General of BWP
34	Dara Johnston	CHIEF OF WASH, UNICEF, Bangladesh
35	Mohammad Alamgir	Principal Scientific Officer, WARPO
36	Ms Anindita Das	Correspondent, Bangladesh Post (journalist)
37	Ms. Rokeya Ahmed	WDS Specialist, World Bank
38	Ms. Suraiya Begum NDC	Senior Secretary and Sherpa, Prime Minister's Office
39	Name not readable	South Africa
40	Ms. Hasin Jahan	Country Director, Practical Action
41	Emaduddin Ahmed	Former Executive Director, IWM and RC Member, GWP-SAS
42	Dr. Umme Kulsum Novera	Professor, Department of Water Resources, Bangladesh University of Engineering and Technology (BUET)
43	Dr. Q.R. Islam	Consultant Agronomist; LGED
44	Sheikh Md. Nurul Islam	Project Director, Participatory Small Scale Water Resource Sector Project, LGED
45	Rafiqul Islam	Senior Correspondent, UNB
46	Chritoph Jakob	WRG 2030
47	Md. Arifur Rahman	Fellow, BUP; Bangladesh Unnayyan Porishod (Bangladesh Development Council):
48	Zahir Uddin Ahmed	FD
49	Bushra Nishat	Program Manager South Asia, IWA
50	Devabrata Chakrabarty	Director (research and Capacity Building); Governance Innovation Unit: Prime Minister's Office
51	Dr. Nilufar Banu	Executive Director; BUP
52	Ms. Buluwaji Onabulu	UNICEF
53	Md. Abul Kashem	Former Chief Engineer, Dhaka Water Supply and Sewerage Authority
54	Md. Soliaman Haider	Director, Department of Environment
55	Ainun Nishat	Former Vice Chancellor, BRAC University
56	Ms.Rummana Tasniem	Office Executive, GWP Bangladesh
57	Ms. Shahnaz Binte Hannan	Intern, GWP Bangladesh
58	Ms. Mukta Akter	Executive Secretary, GWP Bangladesh
59	Dr. Khondaker Azharul Haq	President, GWP Bangladesh
60	Christoph Jakob	Regional Co-Head, Asia: Water Resources Group 2030
61	HE Ms. Leonic Cuelenaere	Ambassador of the Netherlands in Bangladesh
62	Md. Humayun Kabir	Additional Secretary, Ministry of Water Resources, GoB
63	Muhammad Nazrul Islam	MP, Hon' State Minister, Ministry of Water Resources, GoB

Appendix – C: Examples of Most Important Cases of Valuing Water

Sl.	Cases
1	Subsiding water for the poor
2	Production cost of water
3	Differentiate the various uses of water
4	Water Polluters
5	Increase water use efficiency for crop sector
6	Politics of water as manifested in transboundary issues
7	Emphasis creational value of water
8	Conservation and environmental value of water
9	Finite nature of water as a resource
10	Water pricing for irrigation
11	Context specific value of water
12	Storm water reservoir
13	Regional cooperation
14	Participatory water management including gender sensitive issues
15	Municipal water policy
16	Destruction of natural water reservoirs for development
17	Storage of water for seasonal use
18	Internationalization of water resource
19	Everybody's right to receive equitable share
20	Trans-boundary issues

Appendix – D: Issues for the HLPW on Principles + Preamble

Sl.	Incorporation		Addition	Votes
	Preamble	Principle		
1	Yes	Yes	Harness regional cooperation (within and beyond) – water-energy-food nexus based on agreed cost and benefit framework	21
2	Yes	Yes	Both: Add basin wide transboundary	19
3			Safeguarding the poor – Drinking water should be subsidized	12
4		Yes	Principle 6: Easy access for women	11
5	Yes	Yes	Both: Strategic value of water which can help the peace and prosperity of the region	9
6		Yes	Principle: Integrated water use policy for judicious use among stakeholders	8
7	Yes	Yes	Both: Educating youth on value of water	7
8		Yes	Water policy/ law add to Principle 3	7
9		Yes	Principle 3: Valuing water towards considering international trade dimension alongside country	6
10	Yes	Yes	Both: Add political will + commitment	5
11	Yes		Preamble: Neutrality of water – Go to zero water footprint	5
12		Yes	Principle 5: Add risk reduction management	5
13			How to get attention of Minister Finance	4
14	Yes		Value, valuation, pricing – note differences as per Bangladesh experience	4
15		Yes	Principle 4: Educate to empower and increase equitable and inclusive participation of marginalized groups	4
16	Yes	Yes	Both: Data, information, and models for better understanding, transparency, and tolerance between countries for sharing data	3
17			Value of getting the water out – drainage	3
18			Water as national infrastructure – inland transport/navigation	3
19			Mindset and behavioral of change of consumers in reference to incentive system	3
20	Yes	Yes	Both: Language and learning – incorporating rights of human and rights of Nature in valuing water	2
21	Yes		Preamble: Duty bearers – Responsible institutions under principle 4 vs right holder	2
22		Yes	Principles: use or misuse of water – use of tools for improved action – transparent	1
23	Yes		Preamble: Add reuse of water	0
24	Yes		Preamble: The price of water isn't necessarily the value of water	0
25		Yes	Special emphasis to SDG #6	0
26			Add cross-scale water sector issues	0
27		Yes	Principle 1 & 2 has to be context specific	0
28			Simplify – less complex – something that sticks in mind	0
29		Yes	Principle: Investments in innovative solutions should be preferential + guide them	0
30			Procedure for intermediate use level	0

Appendix – E: Actions to be taken by HLPW as well as Stakeholders

Sl.	Actions
1	Sustainability of the program
2	Develop policies on zero discharge and suggest govt. to mainstream value of water to plans and projects
3	Take actions to reinforce inter-sectoral conversations
4	Reinforce allocation rules + compliance mechanisms
5	Conversation/ consultation with poor marginal people to get strong value message
6	Ensure safe drinking water for all keeping provision for subsidy for poor
7	Become member of UN convention on the law of the non-navigational uses of international water courses and encourage other states to become members.
8	HLPW – Acknowledge consultation results
9	Dissemination using appropriate media
10	Create balance and synergy based on…
11	Follow up framework based on SDG context
12	Support regional cooperation/ transboundary issues through honest brokerage: Promote basin wise management
13	Educate farmers by respective departments
14	Increase irrigation efficiency
15	Regional convergence on the use of the outcomes of the plan of actions
16	Multiply/ Scale up plan of action to cover more world leaders
17	Inter sectoral usage
18	Invite the HLPW members to convince govt. in international finance institutes to go beyond to set evaluation criterion for proposals regarding recognizing water as a __ tool
19	Capacity building/ empowerment
20	Ensure involvement of local govt. in process of formulating policies
21	Transparent incorporation of multiple value of water
22	Encourage use of statistics to aid decision-making
23	Update macro level planning
24	Initiate process to make rough and ready methodology as opposed to existing data exhaustive methodologies to apply on a regular basis
25	Developing methods to make valuation more explicit and useful for advocacy and knowledge gathering
26	Long term actions – Invest in education – water issues translated into curriculums of educational institutions
27	Initiatives based more on quantitative analyses as more of a supplement for qualitative
28	GW use such that total annual abstraction not exceed recharge
29	Data has to be made meaningful; Data quality to be ensured.
30	Identification of country level platforms for dissemination of outcomes on a common platform

Appendix – F: Comment Response Matrix

Sl	Comment	Response
1	Would it be possible to sort the comments for the preamble and principle in Annex D according to the number of stickers ("votes") as it is done by most (or maybe all) of the other reports?	The Comments have been sorted according to the number of votes they received.
2	If the comments are sorted according to the "votes" it becomes clear, that the summary of the comments is not fully in line with the ranking. For instance navigation (remark 22) is mentioned as one of the important comments, but it got only 3 stickers. Whereas other remarks with much more stickers are not mentioned in the summary. For example the remark with the highest number of stickers (#13 with 21 stickers) is not really reflected in the summary. Item 1 of the summary is mostly item 1 of the list of comments and not so much 13. I would prefer to have this summary of the comments better aligned with the outcome of the sticker action.	The summary of the comments presented in the section titled **"Technical Session 1: Preamble and Principles"** is in line with the top comments given by the experts when they are sorted according to votes given. This can be seen in the paragraphs as well as the bullet points. The only exception to this being the inclusion of the inland navigation issue which CEGIS believes is a very significant concern.