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Mandate of the Special Rapporteur on the human rights to safe drinking water and sanitation

Questionnaire for Non-State Actors

The principle of accountability in the context of the human rights to safe drinking water and sanitation

Pursuant to the UN Human Rights Council resolutions 27/7 of 2014 and 33/10 of 2016, the Special Rapporteur on the human rights to safe drinking water and sanitation, Mr. Léo Heller, will be elaborating his thematic report to the seventy-third session of the General Assembly in 2018 on the principle of accountability in the context of the human rights to safe drinking water and sanitation.

Accountability implies that actors involved in provision and regulation of water and sanitation services must have clearly defined duties and responsibilities and performance standards (“responsibility”); actors must be answerable to affected people and groups for their actions and decisions, which includes access to information in a transparent manner (“answerability”); and mechanisms should be in place that monitors actors’ compliance with established standards, imposes sanctions and ensures that corrective and remedial action are taken (“enforceability”).¹

The Special Rapporteur departs his initial analysis on the topic from a broad interpretation of the principle of accountability and focuses on the relationship of State and non-State actors² involved in policy-making, provision and regulation of water and sanitation services to the people affected by their actions and decisions.

The Special Rapporteur is seeking information on mechanisms that enable individuals and groups to hold those actors accountable for ensuring the rights to the safe drinking water and sanitation. He, therefore, requests information on good examples, as well as main challenges encountered in establishing, using and implementing such mechanisms. Accountability mechanisms may include, among others, processes of participation, monitoring, oversight, information, as well as judicial, quasi-judicial, administrative, political mechanisms.

As part of his research, the Special Rapporteur welcomes responses to the following questions:

¹ Office of the High Commissioner for Human Rights, “Who will be accountable? Human Rights and the Post-2015 Development Agenda” (2013), p. 10 available from <http://www.ohchr.org/Documents/Publications/WhoWillBeAccountable.pdf>

² Non-State actors may include, but are not limited to: businesses, private actors, development organisations, non-governmental organisations, among others.

1. Please describe the role and responsibilities of your organization in the water and sanitation sector.

ERSAR is *The Water and Waste Services Regulation Authority* (Entidade Reguladora dos Serviços de Águas e Resíduos, in portuguese). In mainland Portugal, the law entrusts regulation of water and sanitation services to one single regulation authority (Law no. 10/2014, of March 6)³. The mandate of ERSAR is to regulate drinking water supply, wastewater and urban waste management services. ERSAR is also the authority responsible for monitoring drinking water quality. The overarching goals are to assure universality of access, continuity and quality of the services, efficiency and equity in terms of affordable tariffs and respect for the environment. Portugal has two Autonomous Regions, which have the possibility to establish their own regional regulation framework and authorities.

ERSAR has full organic, financial and functional independence from the government. Its board of directors cannot receive any kind of instruction from political power or stakes.

The responsibilities entitled to ERSAR are summarised in Article no. 5 of Law no. 10/2014, of 6 March.

2. Depending on the role and responsibilities of your organization, please provide information on how the **principle of accountability is defined and applied in the policies and activities of your organization, particularly to ensure the realization of the human rights to safe drinking water and sanitation.**

Alternatively, please provide information on how the **principle of accountability is defined and applied** in the legal, policy and institutional frameworks of the State(s) with whom your organization is working, particularly to ensure the realization of the human rights to safe drinking water and sanitation.

As a regulation authority, ERSAR embraces the principle of accountability both in its regulation activities and in regulatory procedures.

Regulation activities

ERSAR has a pivotal role in ensuring the collection and disclosure of information about its activities and of water operators, and in promoting transparency and public participation in regulatory activities and in the provision of water services.

The ability to produce relevant information is a core asset. Portugal has a holistic information system for water services, with reliable information, to support regulatory work, the definition of public policies and business strategies and to evaluate the service provided to society, to be able to convey a reliable and regularly updated overview of the sector. The regulator has the responsibility to collect regularly, validate, file and process information about the sector, following a standardised format, which is sufficiently complete and easy to interpret⁴. The dissemination of this information takes place on two levels. The first is the national level, which

³ Available at http://www.ersar.pt/en/site-about-us/documents/law_10_2014_en.pdf

⁴ Article 5 no. 5 a) of the Law no. 10/2014, of 6 March.

is most useful for defining policies and development strategies. The second takes place at the level of the utility and is especially useful for the operation of the systems. The relevant information is available to users of water services in an accessible format, on the regulator's website⁵, in the App ERSAR⁶ or in dedicated publications such as the Annual Report on Water and Waste Services in Portugal (RASARP)⁷.

Accountability is envisaged through dispositions in the legal regime for municipal water services, which sets the rules on information duties of water and waste services operators towards the end-users of these services, namely in what concerns service regulations. There is a specific duty for operators to provide information on their websites about the aforementioned service regulations, tariffs, drinking water quality and accounts, among other.

Consumer laws allow every user to place a complaint to the operator. If this complaint is made in the complaints book, a filled copy of the form is addressed to the regulator for analysis. ERSAR then hears both parts (the operator and the user) and issues a recommendation on how the operator must treat the complaint. Although this recommendation is not binding, it relies on sound technical analysis and utilities tend to comply with ERSAR's judgment. If any of the parts disagree, they should resort to arbitration by judicial institutions. Alternatively, at local level there are centres for consumer support that have the responsibility to help consumers clarify and obtain a response to their queries or complaints. Other institutions such as the Ombudsman can also intervene in the complaint handling on issues related to water and sanitation services.

Users of water services have participation rights at different levels. The majority of service providers operate at municipal level. At this local level, municipal assemblies are the administrative bodies that allow for the participation of every citizen, where questions related to the provision of these services can be raised with elected officials.

Within the regulatory mechanism, public participation takes place at two additional levels: in two bodies formally established in ERSAR (the Advisory Council, for all relevant matters, and the Tariff Council, for tariff definition), and through public consultations. The advisory council is a formal body within the regulation authority that provides advice in the definition of the general guidelines underlying ERSAR's action, assuring the participation of representatives of the main interests involved in the activities of the regulated sectors of the water and waste services. The tariff council is a formal body within the regulation authority for specific ERSAR functions relative to tariffs and prices. Both councils are composed of representatives of the main sectors of economic activity, public administration, water services operators, NGO and consumer organizations. Depending on the issue, these bodies have to be consulted during the drafting of new legislation and regulations.

Additionally, every regulation proposal has to be submitted to an open public consultation procedure with the minimum duration of 30 business days during which the interested parties can issue their comments and submit suggestions.

⁵ <http://www.ersar.pt/en>

⁶ <http://www.ersar.pt/en/communication/app-ersar>

⁷ <http://www.ersar.pt/pt/site-publicacoes/Paginas/edicoes-anuais-do-RASARP.aspx>

Within this procedure, ERSAR informs the Government members who are responsible for the area of the environment and consumer protection, the service providers, the operators covered by the regulatory scope, consumer associations, other associations of general interest and the public of the draft regulation, providing them with access to the respective text and making it available on ERSAR's website. After the period of public consultation, ERSAR prepares and publicises on its website a report reviewing comments and suggestions received, stating the reasons for the decisions taken, and may also refer to the detailed justifications in a supplementary document.

Water services are services of general interest. They are, therefore, by law, subject to specific public service obligations. The operators of these services are bound to promote the universalisation of the services and ensure equality of access, quality of service and the protection of users' interests. They must ensure the transparency in the provision of the services, the protection of public health and of the environment, among other duties.

ERSAR is legally responsible for promoting and enforcing these principles on water operators according to specific rights and duties established in the legal regime for municipal water services. ERSAR can apply penalties for administrative offences when water services operators fail to comply with these duties.

Internal Regulatory Procedures

Within the regulatory framework, accountability mechanisms are present at different levels (Board of Directors, Statutory Auditor, Advisory Council and the Court of Auditors, and judicial review procedures).

The Board of Directors is the collegiate body responsible for the definition and implementation of ERSAR's activity, and for management of the respective services, in conformity with the law and the Statutes. The Board prepares the annual report on regulation and supervision. It prepares the annual activity plans and ensures the corresponding implementation, monitoring and assessment. It prepares the annual report on activities, financial statements and the social balance of the organization. All these documents are publicly available on ERSAR's website.

ERSAR is independent in the exercise of its duties and is not subject to governmental authority, under the terms of the Statutes and of the Framework Law for Regulatory Entities. This disposition was established in order to base regulatory decisions in sound technical assumptions, creating more stability and predictability in regulatory decisions. Therefore, Government members cannot make recommendations or issue guidelines to the governing bodies of ERSAR on its regulatory activity or on the priorities adopted in its pursuit. However, accountability mechanisms were reinforced and the Government member responsible for the area of the environment can request information from ERSAR's bodies on the implementation of the annual and multiannual activity plans, as well as on the execution of the budget and respective multiannual plans. The budget relative to the following year, the respective multiannual plan, and the management report and financial statements of the previous year require prior approval, within the period of 60 days after their reception, by the Government members responsible for the area of finance and for the area of the environment.

The statutory auditor, which is an internal body of ERSAR, is responsible for regularly monitoring and controlling compliance with the applicable laws and regulations, the budget execution, the economic, financial, asset and accounting situation of ERSAR. It is responsible for assessing the quality of the systems of indicators of efficiency, effectiveness and quality, which reflect the overall view of the activities pursued, and results obtained, as well as the annual assessment of the results achieved by ERSAR. ERSAR reports the conclusions of this work to the Government member responsible for the area of the environment.

The Advisory Council is responsible for issuing opinions on the annual plan and report on activities, and financial statements. The *Tribunal de Contas* (Court of Auditors) enforces an ex-post financial control.

Issues relative to the appeal against, review and enforcement of decisions, orders and all other measures, which may legally be objected against measures taken by ERSAR, in administrative offence proceedings (judicial review), fall under the jurisdiction of the *Tribunal da Concorrência, Regulação e Supervisão* (Court of Competition, Regulation and Supervision). Other acts of administrative nature conducted by the bodies of ERSAR are subject to current administrative jurisdiction.

3. Please describe any challenges or gaps identified when applying and implementing the principle of accountability in relation to the human rights to safe drinking water and sanitation. How were these challenges and gaps addressed?

ERSAR has identified the some key areas for improvement in the Portuguese water sector regarding the principle of accountability, which translate in regulatory measures, such as:

- New regulation on commercial relations;
- Review of contracting model for PPP in the Portuguese water sector;
- Monitoring of affordability of water services;
- Access to water and sanitation services by vulnerable and marginalised groups.

Regarding the definition of **new legislation and regulations**, ERSAR submitted a new regulation on commercial relations to public consultation. Once approved, the regulation will enforce binding rules of access and provision of water services, i.e., set the main duties of water services operators and consumers concerning the provision of information, contracting, billing and tariffs, metering, invoicing, payment for the services and service suspension (cut-offs). This new regulation will build on the existing legislation, introduce new rules and clarify others.

Concerning the **contracting of PPP** in the Portuguese water sector, issues have arisen regarding principles of good governance and transparency. ERSAR recognized that the process adopted for the first PPP contracts in Portugal (during the late 90s and early 2000s), with less checks and balances (namely by regulatory intervention) than reasonable resulted in problems with concession contracts. These problems were contained since, for several years now, each tender process for new concession contracts is submitted to ERSAR's non-binding opinion at an early stage, prior to the public tender, where ERSAR identifies the main problems that may derive from the tendering process. ERSAR publicly discloses this opinion. If the municipality

does not comply with this opinion, it must present a suitable justification in a publicly disclosed decision. This procedure introduced better-balanced risk-sharing principles for the latest concessions and in the review of existing contracts. Additionally, ERSAR has been working in new proposals to the Government to change current legislation with a view to address also the model adopted for concession contracts. It is foreseeable that this work continues throughout this year.

Concerning **affordability** of water and sanitation services in Portugal, ERSAR developed and implemented an affordability indicator, which measures average charges of the service in proportion of the households' income. This is a part of the system of assessment of the quality of service provided to end-users, and it aims at providing a macro analysis of whether the tariff levels are affordable or not. On average, water services are affordable in Portugal: drinking water supply service charges represent 0.4% of the average disposable income of the households, whereas sanitation services charges represent 0.3%. These levels are within reasonable standards, both established by ERSAR at the national level, and by international institutions. Yet, ERSAR recognised the need to improve this analysis. The ongoing revision of this indicator aims at including all charges in the water bill. This means considering also taxes and other fees, besides tariffs, reflecting the full costs paid by consumers. This evolution of the indicator will likely reduce the aforementioned affordability levels, yet ERSAR is not expecting macro-affordability problems.

On the other hand, micro analysis (the one that focuses poorest households and checks the specific affordability levels of individual families) is much more complex to measure since it should take into account not only charges of water services, but the cost of other essential goods and services (such as housing, energy, food, telecommunications, among others). This should be, of course, a social concern and information about individual households' income from the tax or social security authorities would be helpful to better support public policies and regulations in the water sector. With this in mind, ERSAR has requested access to this data to the competent national authorities, but so far, with little progress. However, this is not a specific water services issue but rather an overall issue that needs an integrated solution.

Finally, ERSAR acknowledges the need to improve monitoring of access to water and sanitation services by **vulnerable and marginalised groups**, such as the homeless, populations without fixed residence, and individuals with some form of physical disability, which calls for a more intense institutional commitment from all stakeholders in this sector.

Responsibility

- 4. Please provide information on the level of clarity and transparency of the roles and responsibilities, and performance standards of State and non-State actors in accordance with the normative content of the human rights to water and sanitation. In other words, how are defined the roles of the actors responsible for the accessibility, availability, affordability, acceptability and quality of water and sanitation services in an equal and non-discriminatory manner.**

Water and wastewater management services to end-users have historically been a responsibility of municipalities. Accordingly, these actors are at the forefront of the implementation of the human rights to water and sanitation in Portugal, with the support of relevant players such as the regulation authority.

The aforementioned legal regime for municipal water services clearly defines that operators of these services have to establish targets for service provision, in line with the national strategic targets established in the national strategic plans. They have to put forward measures to achieve these targets, including time framing and indicators for evaluation of the progress made.

ERSAR operates according to a regulatory model implemented since 2003. It has two areas: structural regulation of the sector and the regulation of utilities' behaviour. All the dimensions of the regulatory model should be perfectly articulated so that a coherent regulatory intervention is achieved (Figure 1).

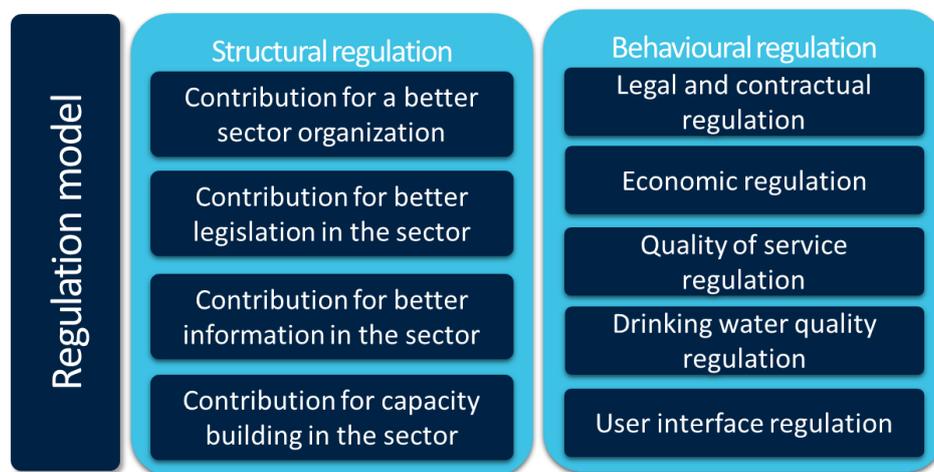


Figure 1 – Regulation model of ERSAR.

Structural regulation must contribute to a better organisation of the sector. The regulation authority cooperates in the development of the national strategies, proposes measures for resolving shortcomings, monitors and periodically reports on the evolution of the sector and the implementation of the strategies. At the same time, ERSAR proposes new legislation and changes to the existing legislation. It also adopts new regulations, binding for the operators. This area also comprises activities related with the preparation and disclosure of sound information accessible to all stakeholders and the technical support to the operators through intense publishing and training activities, usually in cooperation with academic and research centres. ERSAR also has the duty to answer all queries on solid technical grounds in due time.

The regulator ensures the legal and contractual monitoring of the utilities throughout their life-cycle, whatever their management model, particularly by analysing the tendering and contracting processes, contract modifications, contract terminations and mergers of systems, following the compliance with the contracts and intervening where necessary in reconciliation activities between parties.

Economic regulation is the most important form of regulation of the operators' behaviour, in the sense that monopoly prices tend to be higher than those resulting from market competition. Securing affordable prices, whilst at the same time ensuring the economic and financial sustainability of operators, requires firm action by the regulator. The economic regulation also includes the evaluation of operators' investments. Regulation of quality of service is a form of regulation of the operators' behaviour closely related with economic regulation, definitely influencing the behaviour of operators in terms of the quality of service provided to users. ERSAR's legal responsibility for drinking water quality constitutes a specific case of quality of service regulation with very relevant impact in public health, efficiency and general well-being, which justifies the allocation of specific resources to that activity.

As mentioned, the regulation authority defined and implemented a system of indicators (14 for drinking water supply services + 14 for urban wastewater management services) to assess the quality of service provided. The indicators adopted are performance indicators that quantitatively assess the efficiency or effectiveness of an element of the service provided. The results for each indicator and service provider are assessed in terms of its quality (good, average or unsatisfactory), and benchmarked with other service providers (Table 1).

Table 1 – Service quality indicators for water and wastewater services

	Protection of user interests		Protection of user interests
AA01	Service coverage	AR01	Service coverage
AA02	Affordability of the service	AR02	Affordability of the service
AA03	Service interruptions	AR03	Flooding occurrences
AA04	Safe water	AR04	Response to complaints and suggestions
AA05	Response to complaints and suggestions		
	Operator sustainability		Operator sustainability
AA06	Cost recovery ratio	AR05	Cost recovery ratio
AA07	Connection to the service	AR06	Connection to the service
AA08	Non-revenue water	AR07	Sewer rehabilitation
AA09	Mains rehabilitation	AR08	Sewer collapses
AA10	Mains failures	AR09	Adequacy of human resources
AA11	Adequacy of human resources		
	Environmental sustainability		Environmental sustainability
AA12	Real water losses	AR10	Standardised energy consumption
AA13	Standardised energy consumption	AR11	Proper treatment of collected wastewater
AA14	Sludge disposal	AR12	Emergency discharge control
		AR13	Compliance with discharge parameters
		AR14	Sludge disposal

ERSAR is the national authority for the coordination and supervision of the rules applicable to drinking water quality. Each operator has primarily the responsibility of ensuring that the drinking water quality provided complies with the Decree-Law no. 306/2007, of 27 August

(transposition of Directive 98/83/CE to the internal law), altered by the Decree-Law no. 152/2017, of 7 December. ERSAR intervenes in the coordination and monitoring of this legislation, which is binding to all operators of public systems of drinking water supply. Water quality is checked either from the tap (in the case of retail supply) or at delivery point (in the case of bulk supply) in order to identify problems of deterioration in quality across the network.

The monitoring of the sector's evolution in different scopes is performed each year and has public disclosure in the Annual Report on Water and Waste Services in Portugal (RASARP), pushing operators to increase efficiency. The information produced is the basis for investment decisions, policy analysis, national and European statistics about the Portuguese water services and for monitoring of the compliance with the human right to water and sanitation. Information produced by the regulator is feeding national reports in the framework of the Sustainable Development Goals, namely for "Goal 6: Ensure access to water and sanitation for all".

Like other stakeholders, the regulator contributes to the formulation of the Portuguese public policy for water services, towards its rationalisation and the resolution of any malfunctions regarding the regulated services and towards the organisation of the sector, promoting for example an increase in the efficiency and effectiveness of water services and the search for economies of scale, scope and process. It also monitors the strategies adopted for the sector throughout their implementation and regularly reports on their evolution and their limitations. The allocation of funding for investment in the water sector also relies on the information obtained through the quality of service assessment developed by the regulation authority. It also contributes towards improving the transparency of these services, bringing more responsibility and scrutiny and creating a more demanding society, and positive pressure for improving the performance of the sectors.

As mentioned, the law establishes the need to protect the affordability of the services to end-users and to promote the financial sustainability of the operators. ERSAR works to ensure sustainable cost recovery levels, both by reducing costs to efficient levels and by setting reasonable tariffs that cover costs. This intervention allows for softening of tariff increases and for raising adequate revenues to ensure affordability of future generations. Regarding this issue, we would like to mention several working areas of ERSAR: the regular monitoring of cost recovery levels per operator, the definition of an affordability indicator and the use of social tariffs to ensure affordability of poorest households.

5. Please provide information on the **availability and accessibility of information about State and non-State actors** responsible for the realization of the human rights to safe drinking water and sanitation.

Please refer to Question no. 2 for a presentation of the means whereby service providers and ERSAR make information available to end-users and the wider public.

Answerability

6. Please provide examples of good practices or gaps on how the State informs individuals or civil society organisations of its progress, retrogression and failures in the realization of the human rights to safe drinking water and sanitation.

The national strategic plan for water services PENSAAR 2020 (2014-2020) explicitly recognizes that water and sanitation are human rights and that the provision of these services should embody the principles and criteria established in the international framework of the human rights to water and sanitation. The plan encompasses several objectives and instruments to ensure progress along five axis:

1. Protection of the environment and water bodies;
2. Improvement of quality of service;
3. Optimization and efficient use of resources;
4. Social and economic sustainability of the services;
5. Improvement of crosscutting issues and creating basic conditions for appropriate services.

These five axis have linkages to the implementation of the human rights, for instance:

- The efforts to extend the access to sanitation and to use alternative solutions for wastewater treatment (axis 1);
- Improvement of the quality of service and the mechanisms to protect consumers (axis 2);
- Adequate mechanisms to promote water efficiency and conservation (axis 3);
- Social mechanisms to ensure affordability of water services and fair tariffs to guarantee sustainability of the service in the long run (axis 4);
- Promotion of the dissemination of better information (axis 5), among others.

The regulation authority is part of a group of agencies responsible for the implementation of this plan and the human rights. This group monitors the implementation of the Plan and issues an Annual Assessment Report, publicly disclosed, on the completion of the targets included in the Plan⁸.

ERSAR decided publicly disclose an annual report to monitor its own contribution to meeting the targets of the national plan, mainly based on the evaluation process of the quality of the water services provided to consumers. The first report will be published in the coming weeks on ERSAR's website and other communication platforms.

As previously mentioned, ERSAR publishes the Annual Report on Water and Waste Services in Portugal (RASARP), where the evolution of key indicators such as access to water and sanitation, affordability and safe water, among other, is presented and benchmarked between service operators. This information is available on the regulator's website and in the ERSAR App for smartphones.

⁸ Available at https://www.apambiente.pt/_zdata/Políticas/Agua/PlaneamentoGestao/PENSAAR2020/2016_Relatorio_GAG_PENSAAR_2020.pdf

We acknowledge that a dedicated assessment of the progress, retrogression and failures in the realization of the human rights to safe drinking water and sanitation on a national level can be an interesting way forward in this respect.

7. Please provide examples of good practices or gaps on how individuals or civil society organisations **obtain reasoned justification for actions and decision** of State and non-State actors.

As a general rule embedded in Portuguese legislation, all decisions made by administrative bodies have to be duly justified and citizens are granted a general right of access to administrative documents. In the specific case of a decision about a change in the management model of water services (eg. Concession of services), it has to be based on an economic and technical feasibility study that underlines and justifies the benefits of that option. Though these studies are not usually publicly available, any citizen can request access to them pursuing to the aforementioned general rule. For further information about concession of services procedures, please refer to Question no. 3.

Concerning the justification for actions and decisions of State actors, the complaints mechanism referred to in question no. 2 provides a system that guarantees every user of water services a rule based assessment of the written complaints, an answer in due time and the regulatory supervision.

At a local level, municipal assemblies, which are local government institutions, provide a public democratic forum for all citizens, including end-users of water supply and wastewater management services. Some municipal councils submit specific decisions such as tariff definition for municipal services to the municipal assemblies, subject to a more inclusive democratic decision-making procedure and public scrutiny. In any case, tariff decisions are always submitted to municipal assemblies for approval within the annual municipal budget.

8. Please outline the main **obstacles encountered when accessing existing accountability mechanisms***.

*Examples may include judicial, quasi-judicial, administrative, political and social mechanisms.

No relevant information available.

Enforceability

9. Please share your experiences in **holding States accountable** for violation of the human rights to safe drinking water and sanitation. How do these mechanisms work in practice?

No relevant information available.

10. Please provide examples of **accountability mechanisms* suited for holding non-State actors** accountable for breaches of its responsibility to respect human rights to safe drinking water and sanitation.

*Examples may include judicial, quasi-judicial, administrative, political and social mechanisms.

Please refer to Question no. 2 concerning the arbitration by judicial institutions, the centres for consumer support and the Ombudsman.

11. Please describe how your organisation participated in mechanisms to hold State and non-State actors accountable for the violation or abuse of the rights to water and sanitation. Has the contribution been taken into account in a meaningful manner and has it been included in State's follow-up action and reporting?

According to the law, ERSAR has special duties concerning the development of means for alternative conflict resolution and a duty to cooperate with existing solutions. Some Centres for Consumer Support and ERSAR have been cooperating in order to develop alternative solutions to conflicts between consumers and water operators. This cooperation is likely to improve in the near future with the setting up of a national network for alternative conflict resolution under the guidance of the Portuguese government. The goals of this network are to promote an efficient, harmonized approach to alternative conflict resolution, with a national coverage, and a further use of these extra-judicial means.

12. Please provide information on specific cases where compliance with outcomes of accountability mechanisms was or was not ensured or implemented.

No relevant information available

Submission of responses

Due to limited capacity for translation, it is kindly requested that responses be submitted, if possible, in English, Spanish or French and, **no later than 15 March 2018**. All responses will be posted on the official webpage of the Special Rapporteur on the human rights to safe drinking water and sanitation, unless it is indicated that the submission and/or the supporting documentation should be kept confidential.

(www.ohchr.org/EN/Issues/WaterAndSanitation/SRWater/Pages/SRWaterIndex.aspx)

Please keep responses to a maximum of 5 pages (or 3,000 words), and provide links to information or documents when available. Preferably sent via email to: srwatsan@ohchr.org, copying registry@ohchr.org. Alternatively, please send to:

Special Rapporteur on the human rights to safe drinking water and sanitation
Office of the High Commissioner for Human Rights
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CH – 1211, Geneva, Switzerland.

For any question, please contact Ms Madoka Saji, Human Rights Officer (msaji@ohchr.org; phone; +41 22 917 96 36) or Ms. Ahreum Lee, Associate Human Rights Officer (ahreumlee@ohchr.org; +41 22 917 93 91) at the Office of the High Commissioner for Human Rights in Geneva