



SDG 6 IWRM Support Programme

Stage 1

Stakeholder Consultation Report

SDG 6.5.1, degree of implementation of IWRM

Malaysia

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Malaysian CWP

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Stakeholder Consultation Report for SDG 6.5.1

Executive Summary

The 2020 COVID 19 proved to be a challenge for Malaysia, not just in conducting exercises to help prepare the inputs for the SDG 6.5.1 Country Survey Instrument, as it greatly impacted on the safety, health, economy and well-being of the country. Addressing the risks, threats and impacts of the pandemic took, and still has, priority over all matters in Malaysia.

The Government on the 16th March 2020, gazetted the Movement Control Order (MCO), as provided under the Prevention and Control of Infectious Diseases Act 1988 and Police Act 1967, to prohibit mass movements and gatherings, closing down amongst others, public and private offices, schools, institutions of learning, places of worship and business, except those who were given exemption to operate or those listed as essential services. Travel bans were also imposed. The country in not so many words, came to a halt, in a collective effort to flatten the 'curve'.

The MCO after several extensions, with restrictions being removed for some sectors, entered the Recovery Movement Control Order (RMCO) phase on the 10th of June 2020 until 31st August 2020, only then Government offices began to operate fully. At present during the preparation of this report, the States of Sabah, Selangor and the Federal Territory of Kuala Lumpur, Putrajaya and Labuan have been placed under Conditional Movement Control Order (CMCO), and staff in government offices and statutory bodies, except those with specific permission, are back to working from home.

The government is focused on combating the COVID 19 pandemic, making it a priority, and the MCO posed a problem in conducting the required workshops to gather inputs for the Country Survey Instruments, as well as meeting the targeted deadline for submission. Most government agencies, and non-government stakeholders were working from home, and access to required documents and data was difficult. Lives after all, were at stake, and the SDG 6.5.1 reporting had to take a back seat.

a. Mode of consultation

Despite the limitation faced due to the pandemic, efforts were made by the National Focal Point, Division of Water Resources Management and Hydrology, the Department of Irrigation and Drainage Malaysia, together with the Malaysian Country Water Partnership (MyCWP) to carry out the necessary in order to fulfil the reporting requirement. Taking into account the strict MCO and the standard operating procedures in place, only two face to face workshop/meeting with limited number of participants, in compliance with the MCO, took place, on the 17th August 2020 and 7th September 2020. The rest of the engagement took place online within a limited time not exceeding half a day, with sessions taking place on the 12th June 2020, 7th July 2020, 13th July 2020, 21st July 2020, and 18th August 2020. Various stakeholders were engaged during the different online sessions via Google Meet, WebEx, and ZOOM, that was made possible by the MyCWP hosting these sessions (Annex 2 as proposed by the SDG 6 IWRM Support Programme Guidelines pertaining to Agenda has not been included, given the nature of the consultative sessions).

The Survey Instrument was circulated, and 2017 inputs were put in to show the status as reported for the published 2018 report, and participants were encouraged to update on the previous reported status, and

identify gaps or limitations related to implementing IWRM. The inputs from the 2017 survey was useful, as it allowed participants to build up from what was.

As for the online engagement processes, the survey instrument was used during the sessions, and participants were taken through the instrument, section by section, and points that needed to be clarified were discussed, and the 2017 reported inputs (though the questions in 2017 were different) were used as reference during the discussion. One of the major points raised was that the forms were in English, and it was suggested that for the next reporting cycle that the form be translated. During the engagement, translations were provided 'verbally', and a translated form was not produced.

The time frame for interaction was also limited, due to several factors including internet connectivity and device capability, and attendances were not fully recorded. The focus was to gather as much information as possible, given the difficult time the nation was facing. Despite the fact that most of the participants had to work from home, and had limited access to documents as they would normally do pre COVID 19, they did do their level best to support the reporting process.

Time frames for feedbacks were set, usually a time frame of two weeks to one month, depending on the participant and the scale of information required, and feedbacks were returned via email. Participants would either fill the forms or provide write ups and evidences for sections that they identified were relevant to them. The feedbacks were consolidated and checked before it was included in the narrative. Emails were also received from stakeholders that were not part of the online sessions but were informed by the respective representatives. Their inputs were also collected, checked through and where applicable included in the narratives (the local authorities that provided the feedback but were not part of the online sessions are listed in Annex 1).

The preliminary draft containing the first round of feedbacks were tabled at the 17th August 2020 workshop to a limited group of participants. At the workshop further clarification of the required inputs, the proposed narratives for the section on 'status' and 'way forward', the initial choice of scoring bandwidth as well as key points to be taken forward to UNEP for consideration were discussed.

The updated Survey Instrument was then circulated, and feedbacks requested on the proposed narratives together with further evidences to support the statements made. Further consultations were then made with specific stakeholders to further confirm the information, via ZOOM and because of the restrictions and at one point rising Covid 19 cases, there were requests from the stakeholders for extension of time.

The survey instrument was then circulated to a smaller group of stakeholders to reconfirm the narratives and to help cross check the evidences, as well as review the proposed statements for the Way forward, and a face-to-face discussion in full observance of the MCO SOP was held on the 7th September 2020. The bandwidth scores were checked, and the scores set, based on inputs from stakeholders. After submission, there were requests made to revise section 4.2.a. at a consultative session not related to the reporting exercise, and the National Focal Point requested for the information to be included, and suggested revision of the score. This is reflected in the revised survey instrument that was edited by the MyCWP Secretariat on the 31st October 2020 (Annex 4), and the revised survey instrument at the time of this report is being finalised for submission.

b. Points for consideration

One of the key findings of the workshop was the suitability of the description given for the score bandwidth. It was unclear how by locking in the 'score' and the band which the score sits, that it is actually indicative of the actual status of IWRM implementation or adoption or mainstreaming into governance processes. There were at times, small differences between the descriptions that made choosing the appropriate bandwidth a little bit difficult. Having said that, the exercise did not result in divergent scoring or disagreement.

Another point for consideration was that the description suggested that there was only 'one way' of making sure that IWRM approaches are implemented. An example would be in part 4 (Financing), in section 4C: Financing for Transboundary Cooperation, where scoring will only be given if both countries contribute jointly. A score of '0' is given if no such arrangement exists. This caused consternation amongst members who attended the various sessions, as the country is being penalised for not having in place an arrangement that is validated by the Survey Instrument, which does not suit the existing arrangements in place for Malaysia and Thailand. Both parties have chosen to fund projects within their own countries, and report activities that were being funded to the joint committee.

The arrangement has been in place for many years, before SDG 2030, and it has served both countries well. And for such a description within the scoring bandwidth to only recognise what the assessors deem appropriate; i.e. there's only one way to qualify as being a measure of an IWRM implementation. In the case of 4C, not having a joint funding arrangement is seen as a weakness, and would merit a score of '0', whereas in Malaysia the arrangement has worked fine, and the description to justify scoring is unfair, and would suggest that IWRM implementation must follow a 'one size fits all' way set by those who drew up the survey instrument. Once again, if it didn't fit what the survey instrument assessor deemed as fit, then the country would be taken to have performed badly, when it is not usually the case. Several participants pointed out that the survey instrument was inflexible.

There was also difficulty in interpreting what was meant in the description in the bandwidth, the footnotes and the recommended inputs to validate the countries' narratives. The requirement for evidence to support the narratives were described by participants as being too extensive, requiring detailed inputs that did not fit within Malaysia's existing reporting mechanisms. IWRM has been mainstreamed into the country's policy and development processes, but it is not spelt out specifically, and this made evidence gathering a tad bit difficult.

c. Way Forward

Part 3 of this report; Next Steps summarises the key areas that will need looking into to ensure a more effective approach to implementing IWRM. The 11 areas are:

- Information collection;
- Management and monitoring;
- The convergence of various mandates and governance systems;
- Budget allocation and investment;
- Engagement and inclusivity;
- Strengthening capacities and capabilities;
- Roll out of IWRM and IRBM plans;
- Shared basin/aquifers;

- Addressing pollution;
- Mainstreaming ecosystems protection and water related disaster risk reduction; and
- Sustainable and efficient use of water.

1. Conclusions from facilitated discussions on Section 1: 'Enabling Environment'

The overall score for this section stands within the medium-high range (76 points). The section was divided into two parts:

- Status of policies, laws and plans to support Integrated Water Resources Management at the national level; and
- Status of policies, laws and plans to support Integrated Water Resources Management at other levels.

Key points

Malaysia adopts a federated system of government, and water resources falls within the purview of the State authorities. There is a national policy, i.e. Malaysia's National Water Resources Policy 2012, that contains strategies pinned to the principles of IWRM. Translation of programmes and activities have continued over the years, and at present there are initiatives underway to consolidate water related policies bringing together water resources, supply and services under one policy framework. At present these aspects are governed separately. There are several laws in place at the Federal level that regulates various aspects that have bearing on IWRM.

At the sub-national level, which in Malaysia refers to State Authorities, there are policies in place that addresses elements related to water resources, mainly policies linked to the environment, land use and physical development. There isn't a specific sub-national plan dedicated to Integrated River Basin Management (IRBM), but there are various plans in place that addresses aspects related to IRBM. There are also various statutory instruments in place to regulate various aspects linked to water resources and elements of IWRM. With regard to transboundary water management, there are a few transboundary rivers/aquifers (as detailed in the report for SDG 6.5.2), and there is at present only one formal arrangement in place which has been established for many years.

Way forward

It was noted throughout the various consultation processes that there is a need to address how information is collected and reported. There is also a push to converge the separate sectors i.e. water resources, supply and services under an integrated governance framework, and steps are underway towards that shift. There is a need also to consider that the changes to Ministries and portfolios have been rather dynamic in the past two years, and the move towards convergence may be affected by changes in ministerial arrangements.

Recommendations were also made to roll out more IRBM plans, and strengthening stakeholder engagements at inter and intra-Basin levels. Another aspect to be looked at, was the present approach for transboundary water management, to explore the possibility of forming arrangements for shared basins and aquifers, and at country level, addressing financing requirements to manage. With respect to laws, suggestions were made to strengthen capacity and capability to boost enforcement, focusing on increasing provisions for financial, technological support, technical expertise and other regulatory support.

Based on the feedback for the way forward, there is need to shift how information pertaining to elements and aspects of IWRM are collected, structured and reported. As pointed out in Annex D, the present system of governance is sectoral and multiple aspects falls within the purview of several mandated authorities at Federal and State government level. Challenges in water resources governance are often felt in extenuating circumstances, e.g. in cases of extreme weather conditions and pollution discharge that affect water treatment facilities.

Suggestion were made to mainstreaming ecosystems protection, and shift the way resources are managed, which traditionally follows administrative boundaries, to managing in accordance to watershed boundaries. Risks and threats will need to be addressed to boost resilience, focusing on building awareness as well as understanding, focusing on increasing understanding about public, private sector and individual responsibility.

2. Conclusions from facilitated discussions on Section 2: 'Institutions and Participation'

The overall score for this section stands at 65 points, placing this section in the medium-high range. Similar to section 1, questions were posed to measures taken at the Federal and sub-national (State authorities) levels.

Key points

Similar to Section 1, the governance of water is sectoral and sits within the purview of various mandated authorities at Federal and State level. Coordination platforms exists at the national level, the most recent meeting was in 2019. At the State level, there are mandated authorities having jurisdiction over various aspects related to IWRM. Public and private sector participation are also in place, with platforms facilitating the involvement of the public in programmes that benefit policy, planning and management at the national and state levels. Specific IWRM programmes for vulnerable groups are available, but the emphasis on ensuring availability of water supply especially for indigenous and rural communities. The inclusion of 'gender' in laws or plans within water resources management is integral to Malaysia's development programmes under the Ministry of Women, Family and Community Development. Programmes for capacity building are in place, and there is opportunity to expand the spread of coverage, and draw out programmes that are specifically spelt to support IWRM implementation. As for shared basin or aquifers, there are task forces in certain basins, and this provides an opportunity for the States to upscale the existing arrangements and develop new arrangements. With regard to transboundary water management, there is evidence for shared basin recognised by both countries, e.g. Sg. Golok in Kelantan bordering with Thailand, the organisational framework has been established for many years, and the engagement of the two countries are made publicly available at the website that is included in the Survey Instrument.

Way forward

Recommendations were made to roll out strategies contained in the document Transforming the Water Sector: National Integrated Water Resources Management Plan: Strategies and Road Map. There is a need to expand the capacity of State authorities to implement IWRM on a larger scale, which will require additional financial allocations and training to build capacity. Recommendations as per Section 1, are focused on continuing programmes and engagement with the public, to foster shared responsibility for water resources, bridging government measures with community, private sector, non-governmental organisations and community-based organisations efforts at Federal and State level. There is a need to foster a collective of different stakeholders to help gear up IWRM related initiatives at community or local levels, including

initiatives to benefit vulnerable groups. Gender 'inclusion' will continue, and IWRM elements will be clearly marked for reporting purposes. Where shared basins and aquifers are concerned, the recommendation forward is focused on revisiting existing policies and regulatory measures to include measures for shared basin or aquifer management between two State authorities. It is noted in the way forward that whatever recommendation that is made to further intensify the establishment of transboundary management arrangements, it would be dependent on the sovereignty arrangements between both countries.

3. Conclusions from facilitated discussions on Section 3: 'Management Instruments'

The overall score for this section amounts to 58 points, putting this section in the medium bandwidth.

Key points

Continuing from the narratives in Sections 1 and 2, measures and means to monitor of water availability has been put into place, with various aspects being monitored by various stakeholders, and subject to funding, it is expected to expand in coverage. As for sustainable and efficient water use, management instruments are in place, but water tariffs are priced relatively low, and there is a need to push for sustainable and efficient water use, to deter wastage. Pollution control is of great concern, and there are laws in place to minimise pollution and penalise polluters. To support control measures, river policing initiatives have also been put into place to enable the public to contribute data as well as monitor areas, reporting activities that pollute, which at the moment is localised in the Klang Valley, Kuala Lumpur. As noted in Section 1, specific ecosystem management instruments are not in place, though aspects on ecosystems management are provided for in several statutory instruments. As for water related disasters, management instruments are in place, and there is opportunity to further expand coverage. As noted in Section 1 and 2, basin management instruments are available and there is opportunity to increase coverage. Aquifer management instruments have been developed, and has been linked to the National Water Balance system (NAWAB), and there is potential to expand coverage. Data and information sharing over various aspects related to water are varied and to an extent accessible, covering data provide by government and NGOs. Where transboundary data and information is concerned, for existing arrangements, data sharing measures are in place.

Way forward

Recommendations for monitoring water availability, centres on addressing multiple data custodianship and management, and it is recommended that a shift is made towards the development and use of a collective monitoring system. Suggestions were also made to consolidate the data to allow for better accessibility and sharing. To shift towards sustainable and efficient water use, suggestions were made to revisit the existing water tariffs, and promote water efficient product labelling to encourage usage of sustainable and efficient appliances. It was recommended that control measures be extended to non-point sources of pollution, as well as strengthening evidenced and informed based planning, monitoring and enforcement; compliance be made an imperative; penalties imposed to help deter polluters; and steps taken to strengthen the capacity for monitoring and enforcement. Mainstreaming ecosystem conservation and management in existing and future policy and regulatory regimes will need to be done. In terms of water related disasters, suggestions included inclusion of nature-based solutions; inclusion of traditional and local knowledge to help reduce risks and minimise impacts; and the roll out of national risk register that can support informed decision making. With regard to basin and aquifer management instruments, suggestions were made to intensify efforts, with steps to consolidate various management instruments and boost the use of the NAWAB that has been set up to cover the country. There is also opportunity to work towards consolidating data and information through a one stop portal that will link to various information portals, including exploring, developing and expanding

data and information sharing of transboundary basin/aquifers that do not have specific management arrangements in place.

4. Conclusions from facilitated discussions on Section 4: 'Financing'

The score for this section stands at 52 points. Additional inputs were received on the 31 October 2020, and amendments were made by the MyCWP Secretariat, and noted in this report.

Key points

As a whole, the national budget makes provisions for water resources infrastructure which have been utilised for planned projects. Budget for IWRM elements have also been allocated, although budget reporting does not specifically state the IWRM elements. As for state budgets for water resources infrastructure, sufficient funds have been allocated and disbursed. Revenues are raised from water supply and services but are not specifically channelled for IWRM activities. In relation to sub-national basin budgets for IWRM elements, it was noted that allocations are made but not clearly recorded as such, leading to a low score.

Section 4.2.c was not scored, as participants were not in agreement with the description provided in the score bandwidth. The Malaysia -Thailand arrangement for Sungai Golok has been in place for many years, before SDG 2030, and it has served both countries well. Unfortunately, the description within the scoring bandwidth only recognises what the assessors deem appropriate, i.e. there's only one way to qualify as being a measure of an IWRM implementation; and this was unacceptable to the members who attended the sessions. In this case not having a joint funding arrangement is seen as a weakness, and would merit a score of '0', whereas in Malaysia the arrangement has worked fine. The description to justify scoring is unfair, and would suggest there IWRM implementation must follow a 'one size fits all' way set by those who drew up the survey instrument. If it didn't fit what the survey instrument assessor deemed as fit, then the country would be taken to have performed badly, when it is not usually the case, as countries have preferred a certain arrangement, that works for both (this can be viewed at the provide webpage link where financial matters are also part of the committee reporting).

Way Forward

There is an opportunity to make water resources as a GDP contributor, to spur increased investments on water infrastructure. Specific allocations that benefit IWRM, and specific indicators should be determined to measure the outcome of past and ongoing projects to help set the course of future investments and expenditure. Water can be made part of the circular economy and provisions be made to gather and consolidate information in relation to IWRM allocations. In relation to State budgets, suggestions include measures for economic evaluation of water services, and a shift in present tariffs. Options to incorporate provisions for the payment of ecosystems services should be explored and drainage management should be included as part of such service. Suggestions were made for revenues raised for IWRM activities, by specifying the provision of funds for IWRM related projects or programmes; raising revenues not just from water supply and services, but also for water related uses e.g. navigational or recreational uses; and the establishment of a specific water related fund which draws from revenues raised for raw water charges or related water uses, to fund dedicated IWRM related projects. For State budgets, it was recommended that a mechanism is needed to collect specific information related to budget allocation for investment, development and recurrent costs.

5. Next steps

The main points that were raised to help push the country forward and expand the coverage and range of IWRM implementation, include:

i. Information collection

There is a need to explore setting up a system that will facilitate the collection and consolidation of available information related to IWRM, this would require developing the checklist of information required, the custodianship of such information, the system used to catalogue and store the information and the possibility of a complementary data architecture being developed to facilitate a comprehensive information system. Based on the recommendation made in all four sections, information is key, and the structure for information collection is key. It can be used to not only assess and measure performance, it can be used to ensure informed decision making, cultivate 'shared responsibility' and ensure accountability.

ii. Management and monitoring

Monitoring water availability centres on addressing multiple data custodianship and management, with suggestion to shift towards the development and use of a collective monitoring system to facilitate a more comprehensive view of the availability of water. Suggestions were also made to consolidate the data to allow for better accessibility and sharing.

iii. The convergence of various mandates and governance systems

In order to better implement IWRM there is a need for convergence of all sectors, water resources supply and services, so that water can be looked at in totality. Present initiatives as listed in Sections 1, 2 and 3 towards the convergence of various governance systems, and complementarity of the systems, will need further expansion.

iv. Budget allocation and investment

There is an opportunity to make water resources as a GDP contributor, to spur increased investments on water infrastructure. Specific allocations that benefit IWRM, and specific indicators should be determined to measure the outcome of past and ongoing projects to help set the course of future investments and expenditure. Water can be made part of the circular economy and provisions be made to gather and consolidate information in relation to IWRM allocations. In relation to State budgets, suggestions include measures for economic evaluation of water services, and a shift in present tariffs. Options to incorporate provisions for the payment of ecosystems services be explored and drainage management should be included as part of such service. Suggestions were made for revenues raised for IWRM activities, by specifying the provision of funds for IWRM related projects or programmes; raising revenues not just from water supply and services, but also for water related uses like navigational or recreational uses; and the establishment of a specific water related fund which draws from revenues raised for raw water charges or related water uses, to fund dedicated IWRM related projects. For State budgets, it was recommended that a mechanism is needed to collect specific information related to budget allocation for investment, development and recurrent costs.

v. Engagement and inclusivity

Although existing platforms have facilitated engagement of various stakeholders, there is an opportunity to further strengthen existing engagements, expanding the scale and coverage, ensuring that inclusivity is built

in into the process. This in turn will help foster collective and shared responsibility and accountability, and facilitate the bridging of government initiatives with public and private sector initiatives.

vi. Strengthening capacities and capabilities

Capacity building to aid better compliance, enforcement and management runs as a common thread in the four sections. There is a need to raise awareness on the collective responsibility. Support systems that ensure better governance, such as financial, technological and technical support as well as strengthened expertise and skills will need looking into.

vii. Roll out of IWRM and IRBM plans

There are in place various plans that embody elements of IWRM and IRBM. Based on the recommendations made, there is an opportunity to revisit what's in place and planned, to see how these plans can be rolled out to complement each other and benefit the IWRM implementation aspirations and goals.

viii. Shared basin/aquifers

Options to shift from traditional administrative boundaries to watershed boundaries to facilitate better management of shared basin/aquifers will need to be considered.

ix. Addressing pollution

Control measures should be extended to non-point sources of pollution, as well as strengthening evidenced based planning, monitoring and enforcement, compliance be made an imperative and penalties imposed to help deter polluters, in addition to strengthening capacity for monitoring and enforcement.

x. Mainstreaming ecosystems protection and water related disaster risk reduction

Mainstreaming ecosystem conservation and management in existing and future policy and regulatory regimes will need to be done. In terms of water related disasters, suggestions included inclusion of nature-based solutions; inclusion of traditional and local knowledge to help reduce risks and minimise impacts; and the roll out of national risk register that can support informed decision making. Risks and threats will need to be addressed to boost resilience and reduce vulnerabilities, focusing on building awareness as well as understanding related to public, private sector and individual responsibility.

xi. Sustainable and efficient use of water

There is a need to revisit existing water tariffs, and promote water efficient product labelling to encourage more usage of sustainable and efficient appliances

ANNEXES

Annex 1: List of Participants

Annex 2: Agenda

Annex 3: Facilitator's Comments

Annex 4: Photos

Annex 1: List of participants

Workshop participants

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97	Majlis Bandaraya Pulau Pinang		
98	Majlis Daerah Sandakan, Sabah		
99	Majlis Perbandaran Teluk Intan, Perak		
100	Majlis Daerah Perak Tengah, Perak		

Annex 2: Agenda

Online Stakeholder Consultation Workshops

Introduction to SDG 6.5.1 2020

Explanation of each section

Close

Physical Stakeholder Consultation Workshop

Introduction to SDG 6.5.1 2020

Briefing on each section

Agreed scoring for each section

Clos

Annex 3: Facilitator's Comments

The following notes draw upon the points raised in Annex C of the Survey Instrument:

COVID 19 PANDEMIC

Gathering inputs and arranging for stakeholder engagement, was a challenge, as the main focus of government stakeholders was to combat the pandemic, flattening the curve and breaking the chain of infection. The safety and health of all persons was and still is the priority. Engagements were limited to online meetings, and minimal face to face consultations, with. This exercise, during the COVID 19 pandemic is not considered a national priority.

DESCRIPTION GIVEN FOR THE SCORE BANDWIDTH

The descriptions seem to suggest that there was only 'one way' of making sure that IWRM approaches are implemented (see the points raised regarding section 4C: Financing for Transboundary Cooperation). The description only recognised what the assessors deem appropriate; i.e. there's only one way to qualify as being a measure of an IWRM implementation. In the case of section 4C, not having a joint funding arrangement is seen as a weakness, and would merit a score of '0', whereas in Malaysia the arrangement has worked fine, and the description to justify scoring is unfair, and would suggest there IWRM implementation must follow a 'one size fits all' way set by those who drew up the survey instrument. If it didn't fit what the survey instrument assessor deemed as fit, then the country would be taken to have performed badly, when it is not usually the case. The questionnaire seems to lean or favour a specific approach or framework that must be followed in order for IWRM to be successful. What would be useful is for countries to actually know how the scoring rubric was developed, the involvement of stakeholders in framing the questionnaire, and the intent or purpose of the scores.

EVIDENCE REQUIREMENT

Countries were expected to develop a reporting line that was specific to IWRM elements, which would put Malaysia in this case at a disadvantage, as reporting and information collection looks at the water resources sector, not specifically to IWRM. It would seem that if it was not spelt out specifically, then IWRM is taken to have not been 'rolled out'.

INTERPRETATION AND MEANING

There were difficulties at times to ascertain what was actually meant in the description, and the differences in scale of implementation at time were minimal, that made choosing the appropriate score bandwidth a little difficult, and the footnotes based on the feedback of the participants, made determining what evidence to provide difficult, as they were at times too specific.

Annex 4: Photos

[Please include any photos from the consultations here, or email as attachment. People included in the shared pictures should have at least vocally consented to being pictured.]







