

Comments to the Draft National Geospatial Policy, 2021

Submitted by IT for Change

May 22, 2021

Table of Contents

General comments	1
Specific comments on the policy document	2
Geospatial Education and Skill Development	2
Surveyors Registration	2
Mapping Infrastructure	2
Positioning Infrastructure	3
Standards	3
National Data Registry (NDR) and Geo-platform	3
Use of GDPSS	4

General comments

Physical locations are a shared public resource and the policy supporting wider democratization of geospatial data would allow equal digital access to the physical shared spaces. Creating and maintaining geospatial data in a constantly changing world is a very resource intensive process. Hence, contributing to a single geospatial data repository, or releasing the collected data into the public domain under open data licences would benefit the Government, private sector, NGOs, and common public, and help achieve the vision of the policy.

At the outset, we would like to submit that all data collected, processed and/or shared under this policy should be consistent with the provisions of government of India's horizontal or general data related laws/frameworks,

especially the Personal Data Protection (PDP) Bill, and the law that may finally come from it, and with the non personal data (NPD) framework being developed by MeitY.

Specific comments on the policy document

Geospatial Education and Skill Development

The Policy (6.1.1) identifies the lack of standardization of geospatial curriculum and inaccessible geospatial data for research and development (R&D). Encouraging academia to contribute to existing, free geospatial data sources and introducing Free and Open-Source Software (FOSS) tools in the geospatial curriculum, which follow open standards, can help increase the quality of Indian geospatial education at par with the current, global geospatial technologies education practices.

The geospatial Science education program mentioned in the Policy (6.1.5) should recommend FOSS tools and Open Data standards to allow wider access to the program and avoid vendor lock-in on proprietary geospatial file formats. This can also save costs in procuring proprietary tools.

Surveyors Registration

Digital Surveying has become easier with positioning infrastructure systems available on mobile smartphones. So, the Surveyors registration, mentioned in the Policy (6.2.1), should not impact citizens involved in surveying with digital positioning systems to map their neighbourhood on free and open geographic data platforms.

Mapping Infrastructure

The Policy (7.1.1) notes the urgent need to have large-scale maps for the entire country. The High Resolution National Topographic Database prepared/updated through Geospatial Data Promotion and Development Committee (GDPDC) should be released under open data licenses similar to how the Ordnance Survey, the UKs National Mapping Agency has opened up geospatial data for public use. This can enhance easy access to the foundational data through existing mapping infrastructure and ease the map-making process for general and specific use by citizens, businesses, academia, research, NGOs, and the Government. (7.1.2).

The aim of reducing wastage and data duplication is important (3.1, 4.1). It can be fulfilled with data sharing from all sources of data collectors. This has been done for the data collected by the Survey of India (SoI) through Principle 7.1.2 of the Policy but it needs to be considered for all data. It is commendable that the SoI data is considered to be a common good (4.1) but the Policy should be extended to all data collected and explore what data could be considered as a common good. The PDP and NPD requirements as well as the draft EU policy on data governance would be relevant to consider for such determination.

The Policy encourages collaboration of all agencies and individuals, within the Government or non-governmental bodies, to produce and maintain geospatial data and information in a mutually beneficial manner (7.1.3). This needs to happen on free and open platforms and can use localized tools created by global community geospatial platforms that already maintain geospatial data in a collaborative way, as this would significantly enhance the availability of data for all.

Positioning Infrastructure

Access to positioning infrastructure systems helps create accurate geospatial data and existing global positioning infrastructure systems like the US governments GPS and Russias Globalnaya Navigazionnaya Sputnikovaya Sistema, (GLONASS) allow free public access. Indias Indian Remote Navigation Satellite System (IRNSS) should allow free access with reasonable accuracy instead of allowing it at a reasonable cost as mentioned in the Policy (7.2.1). Its accuracy level can depend on the type of use (scientific, civil, defence, or commercial).

Standards

The consistency of standards established by GDPDC, through the Bureau of Indian Standards for each data theme with international standards and protocols, should adhere to the open data standards and specifications (7.5.4).

National Data Registry (NDR) and Geo-platform

It must be noted that the GSD Guidelines seek self-certification of companies involved in data collection (Guideline 8 (ii) (1), Principle 7.1.1, Policy). Subsequently, a negative list of data attributes which cannot be collected,

would be provided, (Guideline 8 (iii)). However, compliance to these will become difficult as no concrete processes have been defined to check the kind of data collected. While the policy moves away from prior security vetting of data (4.1, 7.1.1), one imperative solution is to create a public repository of all data collected by all types of parties so that it can be verified for security purposes also. At the moment, this is only possible for public collectors of data in the form of the National Data Registry (NDR) (7.6). In Principle 7.6.2, it specifies that the NDR may include geospatial data from a source other than a Partnering Agency, if determined appropriate by GDPDC. It shall not store or serve any proprietary information or data/ metadata acquired under a license by any of the Central or State Government Partnering Agency, unless authorized by the data provider. However, data pooling by all players to NDR should be mandated, keeping in mind PDP and NPD requirements. As community data, it should be pooled first for any further use.

Greater clarity is required for players in the GDPDC ecosystem. Currently, the NDR is structured like a data trust, which is a welcome step. The delegated agencies (or data trustees, in our understanding) must also be clarified to be public bodies . For example, with respect to the Partnering Agency (PA) or Lead Agencies, it is provided that nothing in this Policy shall be construed to prevent any Partnering Agency from presenting, providing, or disseminating data that is specific to the functions of the Partnering Agency; or targeted to geo-information consumers that directly interface with the services, portals, or other mechanisms of the Partnering Agency (7.6.4). This suggests the ability of the PA to transact with consumers, even based on data exchanges. If that is so, the transaction data will also be laden with vital insights and it is important to ensure that no competitive advantage arises because the PA is handling data as the trustee.

Use of GDPSS

The products, services, and solutions built on top of geospatial data produced using public funds can have registered/restricted access (8.3.1). But there is no clarity whether all the underlying geospatial data and information used to make such products, services, and solutions should be released as open data (4.1). Releasing this data for public use would help open data communities to create products, services, and solutions alongside the Government and private organizations.

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