

June 12, 2013

## Background

The Agriculture Workgroup sought guidance on a particular aspect of the BMP Verification Principles – transparency – described in Principle 3, Public Confidence:

Verification protocols incorporate transparency in both the processes of verification and tracking and reporting of the underlying data. Levels of transparency will vary depending upon source sector, acknowledging existing legal limitations and the need to respect individual confidentiality to ensure access to non-cost shared practice data.

Transparency is incorporated in the Clean Water Act (CWA), and its regulatory and policy framework, which establishes public access and site-specific data transparency requirements for all sources of nutrients and sediments regulated as point sources. The following definition and recommendations are proposed to clarify the concept of transparency across all nonpoint sources.

### **Proposed Addendum to the BMP Verification Principles<sup>1</sup>: Transparency**

#### Definition of transparency

Transparency means operating in a way so any outside reviewer can determine what actions were taken, which data were synthesized to generate a report or conclusion, how data was collected and obtained, what measures were employed to ensure data accuracy, who is responsible for data collection and synthesis, who is responsible for ensuring data accuracy, and the methods of data analysis utilized.

#### Recommendations

1. The measure of transparency will be applied to three primary areas of verification: data collection, data synthesis and data reporting.
2. Transparency of the process of data collection must incorporate **independent** QA/QC procedures, which may be implemented by the data-collecting agency or by an independent third party.
3. Transparency of the data reported should be transparent at the **most site specific** scale that conforms with legal and programmatic constraints, and at a scale compatible with data input for the Chesapeake Bay Program partnership modeling tools.
4. It is recognized that transparency of data reported will vary across verification methods and data collection and reporting programs. This variance, however, should not negate the commitment and obligation to ensure transparency at the highest level possible **in collection, synthesis and reporting.**

---

<sup>1</sup> [http://www.chesapeakebay.net/documents/Ches\\_Bay\\_Program\\_Partnership\\_BMP\\_Verification\\_Principles.pdf](http://www.chesapeakebay.net/documents/Ches_Bay_Program_Partnership_BMP_Verification_Principles.pdf)