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Comment to the Draft UNFC Supplemental Specifications for Groundwater Resources

Background

The United Nations Framework Classification for Resources (UNFC) is an initiative of the UNECE Sustainable Energy Division. It allows harmonization of assessment of projects that extract primary energy fuels, such as oil, gas, coal, and uranium, as well as renewable energy projects. It is intended as a unique tool for facilitating and harmonizing policy frameworks, government oversight, industry business processes, and efficient capital allocation. Supplemental Specifications have been developed for oil and gas, renewable energy (wind, solar, bioenergy, geothermal), nuclear energy, minerals, injection projects for the geological storage of CO₂, and the anthropogenic resources such as secondary resources recycled from residues and wastes. The UNECE Sustainable Energy Division also decided to include groundwater in the UNFC, and Supplemental Specifications for Groundwater Resources have been drafted by a dedicated working group.

Comments

- 1- It should be noted that the UN World Water Development Report 2021 clearly states that: *“water is not like other raw materials that can be treated as commodities and openly traded on stock markets”*. ([UN World Water Development Report 2021 ‘Valuing Water’](#)).
- 2- It should also be noted that the minutes of the debate at the UN General Assembly on the draft articles of the Law on Transboundary Aquifers report that the overwhelming majority of Member States recommended that groundwater should be dealt with independently of any future work by the International Law Commission on issues relating to oil and gas. ([Draft articles on the Law of Transboundary Aquifers, with commentaries, 2008](#)).
- 3- The document does not give adequate attention to the significant scientific and institutional progress on the development and cooperation on transboundary aquifers in regional water strategies. ([SDG6 Indicator Report 652 Progress-on-Tranboundary-Water-Cooperation_2021_EN_UNECE.pdf\(unwater.org\)](#))
- 4- Note should also be taken of the [UN World Water Development Report 2022 ‘Groundwater: Making the Invisible Visible’SDG6 Indicator Report 652 Progress-on-Tranboundary-Water-Cooperation_2021_EN_UNECE.pdf\(unwater.org\)](#).
- 5- The chapter *“Groundwater Sources and Products”* gives a definition of groundwater that is incorrect.
- 6- While the effort put into the development of the groundwater specifications by the United Nations Economic Commission for Europe (UNECE) Working Group on Resource Management (EGRM) is acknowledged, the methodology presented in the document is not convincing. The document remains rather unclear and does not visibly articulate the benefits of this new classification. Although the document mentions the desire to align the classification with the human rights framework and states that the goal of the specification is to contribute to the SDGs, it does not convincingly demonstrate how the

additional groundwater specifications address the complexity and magnitude of water and sanitation challenges through an integrated human rights-based approach.

- 7- The document has not developed sufficient consideration of the functioning of the aquifer as a natural system.
- 8- Lack of consideration of conjunctive management of surface and groundwater resources.

Lastly, it is regrettable that the UNECE Environment Division and the UNECE Secretariat of the Convention on the Protection and Use of Transboundary Watercourses and International Lakes (Water Convention) and the Protocol on Water and Health have not been involved in the development and decision making on the classification.

The approach presented in the document needs to be critically reviewed. The demonstration of the added value of the classification for sustainable groundwater management and governance is not convincing. One remains of the opinion that groundwater is not a genuine part of this exercise.