

CeReGAS's comments to the Draft UNFC Supplemental
Specifications for Groundwater Resources

10/01/2024

The provided text outlines a General Scheme for Project Classification based on the UNFC 2019, with a specific focus on groundwater projects. While the text is comprehensive and attempts to provide a systematic framework, there are certain aspects that could be subject to improve:

- The text introduces a set of criteria for evaluating groundwater projects, such as hydraulic connection with surface water and ecosystems, mutual interference, and social value. While these criteria are important, the text assumes a certain level of universality in their application. Groundwater systems can vary significantly, and the text could benefit from acknowledging the need for flexibility based on regional or local variations.
- The text discusses various classes of groundwater projects based on the framework proposed by Cuthbert et al. (2022). However, the absence of practical examples or case studies limits the reader's ability to contextualize and apply the classification scheme. Including real-world examples would make the text more practical and applicable.
- The text assumes a level of objectivity in the classification process, with predefined Categories and scores. However, the subjective nature of some criteria, such as social value or environmental impact, is not thoroughly discussed. Acknowledging the subjectivity in certain aspects of project evaluation would contribute to a more effective understanding.
- The text contains technical terms and jargon related to hydrogeology and resource management (not all accepted or correctly expressed). While this may be suitable for a specialized audience, it could pose a challenge for those not familiar with the field (eg: decision makers). Providing clearer explanations or a glossary for terms would enhance the text's accessibility.