

Comments to:

**Draft for Public Comment**  
**Draft United Nations Framework**  
**Classification for Resources**  
**Supplemental Groundwater Specifications**  
**Prepared by the**  
**Groundwater Resources Working Group of the Expert Group on**  
**Resource Management**

Comments by:

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Comments and observations:

**Main Comments:**

1. While the classification initiative comes from a genuine concern to achieve sustainable groundwater management, the fact of the matter is that unlike minerals, energy, and related resources, which most human beings (rural communities specifically) can afford to live without, groundwater as a public commodity and a basic human right used by many rural and urban communities, cannot be subjected to the same classification tool as minerals. The United Nations World Water Development Report 2022-Groundwater: Making the invisible visible (UNESCO, 2022) states that “UN Member States are expected to realize the human rights to safe drinking water and sanitation through action plans or strategies, and – since groundwater is an essential component of water supply and sanitation” ([The United Nations World Water Development Report 2022: groundwater: making the invisible visible - UNESCO Digital Library](#), page 10). None such statements are said concerning commercial minerals; as such, this should exempt ground(water) from being treated in the same group with mineral resources.
2. There are times when decision-makers look at the bigger picture to utilise groundwater resources to meet the basic human needs to sustain livelihoods. However, at an operational level, the tool does not explain, for instance, what will happen when the resource is classified as *non-viable*, yet the resource managers (at the national level) deem it appropriate to exploit the resource for the benefit of the community. These are salient issues that put water at a different and unique level than the minerals, energy, and related resources. The tool may only exist as an academic exercise with no tangible and real application.

3. Furthermore, the tool, as designed, and presented in the document, appears complicated for a typical water resources manager to understand, let alone apply or internalise.

#### **Other comments**

4. It is not clear how the proposed classification and reporting will be aligned to the current practices of dealing (specifically) with transboundary water cooperation (i.e. international laws, regional water protocols on shared water courses, national processes such as EIAs) bearing in mind that recent advances have been made on transboundary water cooperation and are based on the principle that water should be used to promote peace, security and not tension (UNESCO/UNECE, 2023-[N2302939.pdf \(un.org\)](#)). Without this alignment, efforts made to implement this tool may reverse the good achievements already made in this direction.

#### **Observation and Future Considerations**

5. Although this observation is not directly related to the tool itself but to the process of its development, it is apparent that the Groundwater Resources Working Group (GRGW:2019-2023) composition is highly biased towards the countries in the northern hemisphere, except for South Africa (Africa). In the future, efforts should be made to achieve a wider and balanced stakeholder representation, including geographical and wide national development status, particularly on issues meant for universal application.