

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

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General Comments

1. *The general background on groundwater and its potential is misrepresented.*

“Deep groundwater circulates much slower and participates in the rock cycle and the water cycle. It has high mineral and salt content and requires treatment prior to use for non-saline requirements. Deep groundwater is not usually renewable on human time scales. Deep groundwater is used mainly for industrial water sources, energy production, and waste disposal. While groundwater is abundant globally, it is highly variable across countries and regions. Groundwater supplies are diminishing in some regions, with an estimated 20% of the world’s aquifers being over-exploited, suggesting groundwater use is often unsustainable. This trend needs to be reversed to ensure groundwater is available as an essential water resource. Thus, it is critically important that this resource is developed and managed sustainably.”

World Water Development Report on Groundwater is suggested as reference for background on groundwater and scientific description of groundwater (United Nations, The United Nations World Water Development Report 2022: Groundwater: Making the invisible visible. UNESCO, Paris.)

“The motivation for this innovation is twofold. One is to recognize that many groundwater projects already exist outside of the commercial space of Earth-resource developments.”

This understanding is problematic as it recognises groundwater for its economic value much like minerals and is silent on groundwater being a public good and multiple values of groundwater such as the value of water for domestic use, the human right to water, customary or religious beliefs, and the value of maintaining flows to preserve biodiversity. None of these should be sacrificed for the sake of achieving consistent valuation methodologies.

2. *Definition document.*

The definition of what groundwater does not include is rather unscientific and viewed from the lens of the mining production. Groundwater already plays a vital role in supporting food and energy security. Groundwater should be treated in an integrated fashion and as a resource common to all.

3. *General Comments*

Water policies of most countries would not support the seemingly commercialization of water as it is a human right and can’t be viewed same way as other resources such as minerals that are of commercial nature. This does not mean that the economic value of water is somewhat diminished , the point of emphasize is that it is not a commercial commodity.

The proposed classification of projects might not work for all countries. Economic and social environments differ greatly.

The other related aspect of groundwater is that it becomes an intervention measure in instances of drought , in most countries used as local resource for livelihoods and thus being seen as a fall back position in disaster situations.

Groundwater situations differ from country to country in various aspects of quality and quantity (natural occurrences or state) and the tool needs to take that into consideration including the replenishing and natural purification processes. Groundwater and climate change should feature strongly in groundwater sustainably and management.

To what extent does the framework emphasizes the need for Groundwater information being readily available and shared among countries sharing Aquifers (transboundary aquifers)?