

Courbevoie, 15 January 2024

**Objet : Draft UNFC Supplemental Specifications for Groundwater / Comments by the French Water Partnership**

**To the UNECE Sustainable Energy Division**

Dear Madam,  
Dear Sir,

We have been alerted by several of our members about the potential risks of the proposed [UNFC classification of Groundwater](#).

After analysis of their work on the matter, we would respectfully submit the following comments on the proposed classification:

1. Groundwater cannot be compared to oil and mineral resources and be the object of viability assessments for economic use. Groundwater, which is the biggest reservoir of freshwater on Earth, a vital resource for all living beings, is a common good, necessary to fulfil fundamental human needs, support ecosystem services and economic services and is a critical component of the Earth system. Groundwater development cannot only be analyzed restrictively in the context of economic returns.
2. The proposed specifications fail to explain how they will address major characteristics, roles and services of groundwater: 1. the 'common pool resource' character of groundwater; 2. the applicability of the specifications to non or barely renewable groundwater; 3. the role of groundwater as an ecosystem in itself, and its links to other systems, including surface water and terrestrial and aquatic ecosystems; 4. the multiplicity of groundwater contexts across the globe (hydrogeological, socioeconomic, and institutional) ; 5. groundwater quality; 6. the dynamic impacts of unfolding climate change. and 7. the seasonal and multi-year variations of availability and exploitability over different periods of time.
3. The proposed approach to 'groundwater projects' is piecemeal and fragmentary. This approach will jeopardize the integrated and systems-oriented water resources management approaches at the basin or aquifer level, which have been widely accepted

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and adopted as universal best practice and a global objective in Sustainable Development Goal target 6.5.

4. When compared with the provisions of the UNECE Water Convention on the Protection and Use of Transboundary Watercourses and International Lakes, the added value of the specifications is unclear. There appears to be a serious risk of contradiction and of misunderstanding groundwater resources and systems.
5. The proposed groundwater specifications document is not coherent. The document has many terms and loose statements that are incorrectly defined and/or unsubstantiated. Even the term groundwater is not defined according to generally accepted hydrogeological definitions. It is unduly complex and unwieldy and serves only to confuse the issue rather than clarify it.
6. The proposed specifications fail to reflect the complex and systemic approach which led to the Agenda 2030 and aims to tackle the complexity and magnitude of the water and sanitation challenges.

In conclusion, we strongly recommend that the proposed specifications be reviewed and discussed with other UN bodies, including **UN-Water** and the Secretariat and experts of the **UNECE Water Convention on the Protection and Use of Transboundary Watercourses and International Lakes** and of the **Protocol on Water and Health**. Both these treaties are widely ratified and implemented. They are hosted by UNECE and cannot be ignored by new UNECE specifications and guidelines.

**The French Water Partnership and its constituent members (academics, hydrogeologists, industries, local governments, NGOs, etc), remain at disposal of UNECE to discuss the above.**

Marie-Hélène Aubert  
Présidente du Partenariat Français pour  
l'Eau

