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Kindly find our comments on the attached Draft UNFC Supplemental Specifications for Groundwater.

The main concern is the approach and treatment of groundwater as a commodity that is transferred from a source into product which has a potential to mirror the management of commodities which would be detrimental not only to groundwater management but also to societies. It is not clear what is the added value of this approach and why is groundwater being proposed to be grouped with mineral and such resources. The tools of classification seem to lump various factors together which might mask important factors to consider in sustainable groundwater governance. It is also not clear how this tool helps in the universal challenge of enforceability of such complex frameworks that are usually picture perfect on paper but miserably fail when it comes to groundwater governance and management. Finally, the transboundary management and cooperation of groundwater is mentioned without clear reference to existing international law and the two global conventions knowing that ECE is Secretariate to one ignoring the complexity of such situations and the potential for major conflicts.

In general, the specifications need critical revisiting as to the approach adapted and the expected value to groundwater management and whether dealing with groundwater as a mineral product has the potential to further encourage more unsustainable management of groundwater.