

118 experts, professionals and representatives joint comment letter to UNECE Sustainable Energy Division regarding:

Draft United Nations Framework Classification for Resources - Supplemental Groundwater Specifications

The United Nations Economic Commission for Europe (UNECE) Sustainable Energy Division has developed groundwater specifications for application to groundwater projects, as a supplement to the Mineral and Anthropogenic Resources (2022) Guidance. The present supplement purports to support Member States (Europe and beyond) in evaluating the viability and feasibility of groundwater resource projects. The specifications and approach documented in the draft Supplemental Groundwater Specifications have been issued by UNECE in a global call for comments and review.

This joint letter serves as a response to UNECE Sustainable Energy Division's call for comments from a group of concerned groundwater specialists, practitioners, and stakeholders, responding either in their own capacity, or on behalf of their organization (see the affiliations).

Fundamental concerns raised regarding the Groundwater Specifications

1. *The specifications are not appropriate for groundwater resources.* The major concern with the approach is its questionable applicability to groundwater resources when analysed in relation to the 2022 UNFC Guidance¹. Groundwater as a resource is not a commodity comparable to oil and mineral resources, which can be subjected to viability assessments for commercialization. Groundwater is inherently a common good, which serves fundamental human needs and ecosystem services. Economic returns from groundwater development can only be associated with the services that it provides, e.g. for public water supply, not for the resource, *per se*.
2. *The specifications are not clear on how they will properly account for central issues:* 1. The common pool resource character of groundwater; 2. The human right to have access to water; 3. The application of the specifications to non- or little renewable groundwater resources; 4. The role of groundwater as an ecosystem in itself, and its link to other systems, including surface water and terrestrial and aquatic ecosystems; 5. The multiplicity in groundwater contexts (hydrogeological, socioeconomic, and institutional) across the globe; 6. Groundwater quality; and 7. The dynamic impacts of unfolding climate change.
3. *The approach to 'groundwater projects' is piecemeal and fragmentary.* This will counteract and jeopardize the integrated, conjunctive and more systems-oriented water resources

¹ United Nations Economic Commission for Europe (2022). UNFC Guidance Europe. Guidance for the Application of the United Nations Framework Classification for Resources (UNFC) for Mineral and Anthropogenic Resources in Europe. https://unece.org/sites/default/files/2022-10/Revised_UNFC_Guidance_Europe_as_of_19.October.2022.pdf.

management approaches at a basin or aquifer scale, which have been widely accepted and adopted as common best practice.

4. *When compared with the provisions of the UNECE Water Convention, the added value of the specifications is not obvious.* There appears to be a serious risk of misunderstanding groundwater resources and systems, rather than providing improved approaches.
5. *The groundwater specifications document is not coherent.* The document has many terms and loose statements that are incorrectly defined/poorly substantiated. Even the definition of groundwater is not specified according to generally accepted hydrogeological definitions. It contains an unduly complex/unwieldy text, which would not serve its purpose well.

Furthermore, we regret that the UNECE Environment Division and the UNECE Secretariat of the Convention on the Protection and Use of Transboundary Watercourses and International Lakes (Water Convention) and the Protocol on Water and Health have not been involved in the decision making on the development of the classification and the preparation of the document.

It is the considered view of the signatories of this statement that the added value of the supplemental specifications is at best limited and at worst highly likely to cause confusion and incoherence in groundwater resources management. The supplemental groundwater specifications are not in line with the efforts made in the framework of the Agenda 2030 to tackle the complexity and magnitude of the water and sanitation challenges with an integrated human rights-based approach.

Proposed action

We acknowledge the efforts put into the development of the groundwater specifications. However, we, the undersigned, based on the above, recommend curtailing further development of the groundwater specifications. We also stress that we stand ready to support UNECE in its efforts to support sustainable groundwater management in the pursuit of the Sustainable Development Goals.

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