



Asociación Internacional de Hidrogeólogos Grupo Español

Asociación inscrita en el Mº del Interior con el Nº Nal. 91.562 – C.I.F. G79426235

In this letter we refer to the Draft Supplemental Specifications for Groundwater Resources developed by UNECE Sustainable Energy Division for application to groundwater resource projects, as a supplement to the Mineral and Anthropogenic Resources Guidance (2022). Specifications, have been issued by the UNECE in a global call for comments and review from concerned groundwater specialists, practitioners, and stakeholders, responding either in their own capacity, or on behalf of their organization.

I write this letter as the president of the Spanish Group of the International Association of Hydrogeologist, reflecting the concern shown by our members. We consider the referred specifications are not appropriate for groundwater resources. This letter serves as a response to UNECE Sustainable Energy Division's call for comments.

Our first concern is that groundwater differs from commodities like oil and minerals in that it cannot undergo viability assessments for commercialization. Unlike these resources, groundwater is inherently a common good, playing a vital role in meeting basic human needs and sustaining ecosystem services. The economic benefits derived from groundwater development are tied to the services it offers, such as public water supply, rather than the resource itself.

Additionally, groundwater, being a renewable and dynamic resource, plays a vital role in sustaining surface water features such as rivers, springs, and wetlands. It is influenced by human activities, climate variability, and the impacts of climate change. The application of groundwater hydrology becomes imperative to enhance our ability to monitor aquifers and predict the dynamics of groundwater flow, storage, and the transport of pollutants within aquifers. These considerations are unique to groundwater and are not essential in the understanding and utilization of other resources. Moreover, in the provisions of the UNECE Water Convention these crucial elements are not readily apparent, posing a significant risk of misconceptions about groundwater resources and systems, rather than offering enhanced approaches.

While we acknowledge the efforts invested in developing groundwater specifications, considering the points mentioned earlier, we recommend limiting further advancement of these specifications. We

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also want to emphasize our readiness to assist UNECE in its endeavours to promote sustainable groundwater management as part of the pursuit of the Sustainable Development Goals.

Your sincerely,

Carolina Guardiola Albert

President of the Spanish Chapter of the Internacional Association of Hydrogeologists