COMMENTS of TURKEY

on the 3rd order draft of the Strategic Plan of the 9th Phase of IHP (IHP-IX 2022-2029)

Turkey thanks the Secretariat for the 3rd order draft of the Strategic Plan of the 9th Phase of IHP (IHP-IX) and would like to share the following comments on the documents.

- The priority areas in document are adequately linked to Agenda 2030 and the Sustainable Development Goals (SDGs) as well as to similar activities of other UN agencies and the Strategic Plan of the 8th Phase of IHP (IHP-VIII). However, its language is still not easy to understand. There are a number of repetitions throughout the text which make it difficult to extract the main messages for decision makers. Objectives and expected results are not articulated clear enough in the draft.

- Furthermore, there is limited reference to the former and current work as well as existing tools of IHP regarding the priority areas. IHP-IX should be the continuation of the earlier phase of the work of IHP in areas where it has made a difference due to added value and comparative advantage. These should be reflected under the "*Assuring Continuity with Change*" (page 11) section accordingly.

- Expected outcomes within the scope of priority areas are quite ambitious since limited financial resources of IHP will make the implementation difficult. The "Implementation Plan" should be supported by a financing strategy.

- The contribution of IHP to developing countries in solving their key water problems and achieving SDG 6 remains unclear.

- A number of IHP Flagship Initiatives are listed in the Annex. However, the draft does not provide the link between the suggested priority areas and the relevant flagship initiatives. It is not clear which initiative will be used as a tool for the implementation of the proposed priority areas.

- As the main aim is to ensure water security within the context of the Agenda 2030 and the SDGs, this point should be addressed more clearly in the draft. However, in the draft priority areas are also defined as "aim". Therefore more clarity concerning priority areas and "aims" are needed.

- Developed by UN-Water, SDG 6 Global Acceleration Framework is a "tool" that aims to contribute to swift results on an increased scale to achieve the SDG 6 by 2030. As such, it would not be appropriate to consider "supporting SDG 6 Global Acceleration Framework" as one of the "missions" of IHP for the coming period. IHP's mission must be much broader and visionary. On the other hand, the essence of the framework document has already been well reflected in the draft in section "Meeting the SDGs and other water-related International Agendas".

- The term "inclusive" should be removed from the title of Priority Area 4, as eight of the expected outputs (from 4.2 to 4.9) are directly linked to "sustainable water management" and only 4.1 is about "inclusiveness".

- A number of policies and approaches on water issues have been developed following several UN Conferences held on water issues and they all deserve to be duly referred. Therefore, UN Mar del Plata Conference in 1977 (page 34, para 1) should not be singled out.

- IHP should continue to focus on the Integrated Water Resources Management at the national level, in particular strengthening the capacities of Member States. Furthermore, as designated co-custodian agency, UNESCO's contribution to SDG indicator 6.5.2. is limited to reporting on "transboundary aquifers". However, this draft seems to aim at expanding IHP's mandate, such as in relation to transboundary waters, which should not be the case.

- There is no agreed definition on the concept of "water security" at the UN. In this regard, it would be more appropriate to include UNESCO's own "water security" definition as reflected in IHP-VIII. The definition in the current draft refers to an academic publication upon which it has not been agreed within the UN. Therefore it should be removed.

- Numerous meetings and conferences on water issues have been held within the UN system for long years. The High Level Panel on Water and Peace (page 6, para 2) is an initiative formed with the participation of senior representatives of a limited number of countries. Therefore the work of this informal panel should not be taken as reference as such.

- Priority Area 5: "Water governance based on science for mitigation, adaptation, and resilience" refers to institutional and legal frameworks. This is far beyond IHP's mandate and IHP's contribution on this subject remains unclear in the draft, especially in "Expected Output 5.2". IHP's mandate in water governance does not cover the issue as a whole therefore it would be more appropriate to underscore IHP's role in supporting Member States that need to build or develop their institutional capacity.

- Use of credible data is necessary, in line with UNESCO's mandate in the field of science. The "citizen science" concept is not a scientific method for data collection. Data collected by citizens will not be compatible with national data collecting systems in terms of quality and accuracy. It is also not clear how UNESCO can verify this data. Before any implementation of this concept, advantages and disadvantages of "citizens science" in the field of water should be discussed thoroughly in UN fora.

- As a globally agreed definition of "nature-based solutions" concept does not exist, IHP should continue to use "eco-hydrology" concept.

- Without doubt, data is the most important tool for sustainable water resources management. However, it does not seem to be possible to establish an international platform for global water data. On the other hand, collection and sharing of water-related data remains a sovereign right of the Member States. There are different UN agencies collecting water-related data and the work of IHP should complement the work of these UN agencies, rather than duplicating it. Considering the institutional and capacity building challenges of developing countries, and accordingly the data gap between developing and developed countries, the comparative advantage of IHP in this field is to support those Member States that need to build their capacities for data collection and assessment. Therefore, numerous references made to "open access database", "free access to data, especially in transboundary resources" and "global access to data" should be removed accordingly. - The United Nations Climate Change (UNFCCC) Conference of the Parties (COP) is the main body in which international negotiations on the climate regime are conducted. Its rules and norms are clearly defined. The work of other international organizations on climate change should only be "complementary". Therefore, IHP should support the capacity building initiatives aimed to advance vulnerability studies and to adapt actions on water resources related to climate change in Member States who request such support, rather than working on "Nationally Determined Contributions (NDC)".

Our detailed comments and amendments concerning the 3rd order draft of the Strategic Plan of the 9th Phase of IHP are enclosed herewith.