Comments of the Republic of Türkiye
on the Draft UN System-Wide Strategy for Water and Sanitation

Türkiye contributes to the development of the draft UN System-Wide Strategy for Water and Sanitation in accordance with the UN General Assembly resolution A/RES/77/334 entitled “Follow-up to the United Nations Conference on the Midterm Comprehensive Review of the Implementation of the Objectives of the International Decade for Action, “Water for Sustainable Development,” 2018–2028”, in which in its operative paragraph 5, the Secretary-General is requested to present a UN wide water and sanitation strategy in consultation with Member States.

As part of this mandated consultation process, Türkiye presents herewith its comments and concerns, with the expectation that they are taken into consideration in the revision of the document.

A. General comments

i) Türkiye welcomes that the draft Strategy focuses on the implementation of SDG6, considering that the UNGA Resolution A/RES/77/334 is adopted under the “sustainable development” agenda item of the General Assembly. Therefore, the focus of the strategy should be limited to “sustainable development” only, without referring to other pillars of the UN, including peace and security.

The draft strategy is expected to give particular emphasis on the water related needs of the developing countries, including those related to finance, technology transfer and capacity building, as was requested by Member States in the UNGA Resolution A/RES/77/334. Yet, the draft strategy falls short of prioritizing these issues and rather appears to be focusing on other areas for intervention by the UN system.

As such, the draft strategy is considered to be ambitious in terms of the scope of actions to be taken by the UN system in a period where the funding for the UN Development System is a great concern, and fails to provide the means for implementation of this strategy. The strategy would benefit more from focusing on addressing the water related needs of the developing countries, including those related to finance, technology transfer and capacity building, rather than envisaging a stronger role for the RCs/UNCTs.

In page 19, the draft strategy calls for UN entities to increase collaboration on climate finance proposals for water-related areas to help unlock new resources from climate funds. Currently, the existing climate funds are not sufficient to address the needs of developing countries in the fight against the threat of climate change in the context of UNFCCC as well as the Paris Agreement. Therefore, it would be more convenient if the strategy elaborates on the ways to mobilize further financial resources and to close the financing gap to address the needs of developing countries for the water sector. Climate change funds should not be presented as one of the main sources of funding the water sector.

ii) The draft strategy fails to provide a clear explanation of the role of Member States in its implementation. It should be highlighted that the work carried out by UN is to support the efforts of national governments in this sector. Water is not a global common good. It is under the prerogative of Member States to develop their own water policies and define their own
water policy measures. The document should not lead to a misunderstanding as appearing to be depicting the UN as an entity taking over the role of national governments on this matter.

The UN should support the Member States upon their request and complement the work carried out at the national level by governments. The support of UN should also be “demand driven”. These should be reflected as the main principles for UN in the implementation of this strategy at the national level.

In the context of the strategy, support of UN to interested Member States as well as the financing of this support should not be conditional and should not be limited to the assessments of Resident Coordinators or UN Special Rapporteurs.

In accordance with the UNGA Resolution 75/233, the strategy should underscore that there is no “one size fits all” approach to development, and reiterate the call to the UN Development System to continue to enhance its efforts, in a flexible, transparent, accountable, timely, coherent, coordinated and integrated manner, and to continue to pursue full alignment of operational activities for development at the country level with national development plans and strategies to strengthen national ownership and leadership at all stages of the operational activities of the UN Development System in order for the entities to respond to national development needs and priorities in accordance with their mandates, while ensuring the full involvement of all relevant stakeholders at the national level.

iv) The Annexes to the draft Strategy are not shared with presented Member States for their consideration. If those documents, including the “Collaborative Implementation Action Plan” (Annex-I) as well as the “Global Policy Landscape” (Annex-II), are considered to be part of the Strategy, the Annexes should be consulted with Member States as well, in accordance with the UNGA Resolution A/RES/77/334.

v) In the draft strategy, on the one hand, water scarcity is highlighted as a growing problem in many parts of the world, and conflicts and climate change are presented as the factors that exacerbate the issue. On the other hand, the draft strategy asserts that effectively managing water and sanitation is an essential solution to tackling pressing global challenges like climate change, affordable and clean energy, biodiversity loss, food insecurity, disease pandemics and epidemics, disasters caused by natural hazards, conflict, extreme poverty and gender inequality.

The draft strategy, while highlighting the above-mentioned concepts, refrains from explaining the root causes of water scarcity in developing countries, in particular lack of water-related investments, lack of funding for water sector, lack of capacity, lack of water infrastructures and lack of sustainable water management systems.

vi) The draft strategy calls for the UN system to support the mainstreaming of water-related issues into intergovernmental processes linked to themes such as climate change, disaster risk reduction, humanitarian crises, food and agriculture, health, biodiversity, oceans, environment, urban development, women’s empowerment, finance and international cooperation, and strengthen engagement with UN human rights mechanisms, particularly the Universal Periodic Review and treaty bodies.
Currently, the annual funding required to achieve the SDGs has an estimated USD 4.2 trillion deficit, including for SDG6. The existing Resident Coordinator (RC) funding system model has been under consideration, as in 2022, and the shortfall has amounted to $85 million.

On this note, Türkiye would primarily like to know how UN is planning to mainstream water across all Member states-led intergovernmental processes. Secondly, mainstreaming of water to other processes can only be rational if it is “relevant” to the process under consideration. Thirdly, it is up to Member States to mainstream water-related issues into state-led intergovernmental processes, not UN.

vii) Türkiye has supported the initiative for the appointment of a UN Water Special Envoy by the Secretary General with the understanding that the Envoy shall approach water issues in an unbiased, impartial and independent manner, respecting the different positions, circumstances and perspectives of all Member States and that the Envoy shall focus on raising awareness on SDG6, promoting water-related investments and mobilizing financial resources for developing countries.

As there has been a number of references to the role of UN Special Envoy on Water in the draft strategy even before the official appointment by the Secretary General, it is important to highlight in the document that the role of the Envoy will be conducted through a focus on the strengthening of the efforts for achieving SDG6.

viii) The strategy document calls UN executive heads and other senior UN leaders to meet annually to discuss actions agencies are taking to strengthen water and sanitation programmes, set UN system priorities, identify opportunities for interlinkages with other major topic areas, and address emerging issues, gaps, and resourcing requirements. As such, Member states should also be briefed on a regular basis on the implementation of the strategy.

B. Areas of Concern

i) Türkiye considers water as a source of cooperation, rather than one for conflict and disagreement. Water resources that span national borders are more likely to be a source of such collaboration. Linking water and security is not appropriate. As such, we ask for deletion of those references from the document including from Section I, Output 2.2, Outcome 3, Output 4.5.

ii) In the draft strategy, there is strong emphasis to transboundary water cooperation rather than integrated water resources management at all levels. Transboundary cooperation is among the many different levels of water cooperation, not the only one. Transboundary water cooperation is under the prerogative of Member states and subject to bilateral relations. Therefore, Türkiye would ask for the deletion of the paragraphs, in particular the “illustrative supporting actions” at the “regional level”, that focus on transboundary level cooperation.

iii) In page 16, Output 3.3, under sub-title “illustrative supporting actions/inter-agency”, the strategy states that “The UN 2023 Water Conference discussed establishing an “inter-COP” process that would facilitate dialogue and improve policy coherence on water-related goals and targets in between the Conference of the Parties meetings for different intergovernmental processes”.

As the UN Water Conference did not produce an intergovernmentally agreed document,
any references to its outcomes should be excluded from the draft strategy including Outcome 1, Output 3.3, Outcome 4.

iv) Page 23: Output 4.5, under sub-section “Illustrative supporting actions/regional-level”, the draft strategy calls for UN system to encourage transboundary water cooperation by assisting Member States in acceding, implementing and complying with the two global UN Water Conventions and further calls the UN system can step up water diplomacy efforts to increase political engagement based on a detailed technical understanding of interests, positions and constraints affecting parties and speaking with one UN voice in developing a joint vision in countries that share a transboundary basin.

The entire paragraph above should be deleted for the following reasons:

First and foremost, transboundary issues are to be handled among the riparian countries only. Water diplomacy efforts might favour a specific and limited approach which may prove inappropriate for a solution in a given basin. Third parties may not able to fully understand the cultural, political, socio-economical and hydrological dynamics of a given basin.

Secondly, the UN Water Conventions fall short of addressing today’s water challenges. Even though they are open for accession to all UN Member States and donor countries have been promoting these Conventions through earmarked contributions over 3 decades, the number of Contracting Parties to these Conventions remains limited. It is redundant for UN to focus its resources on these Conventions. It would be more convenient for the UN to rather look for other ways in supporting developing countries in their efforts in achieving SDG6, in particular through increasing their institutional, technical and financial capacities.

v) In Page 25, it says that UN country programmes (UNSDCF, CCA) RC/ UNCTs can use the SWS and its collaborative implementation action plan to develop and guide UN joint country programming, starting at the Common Country Analysis (CCA) stage and the UN Sustainable Development Cooperation Framework. The SWS can also inform water-related elements in other inter-agency assistance planning mechanisms including for humanitarian, human rights, and mediation support.

As elucidated above, facilitating and encouraging efforts in the form of mediation may prove inadequate and limited for a solution in a given basin. Secondly, the UN has not been granted a specific mandate in the water sector. Transboundary water issues should be addressed among riparian countries. For that reason, the term “mediation” should be deleted from the draft.

vi) The draft strategy calls for the UN system to strengthen engagement with UN human rights mechanisms, particularly the Universal Periodic Review and treaty bodies.

Türkiye would like to enquire the plans of UN in this context. Secondly, the main reference for UN in the water sector from a human rights perspective is the UNGA Resolutions on human rights on access to drinking water and sanitation that has been adopted so far since 2010. Therefore, the sentence in page 15, Output 3.3 starting with “to strengthen engagement with UN human rights mechanisms, particularly the Universal Periodic Review and treaty bodies....” needs to be deleted.
vii) In Output 4.5, the draft strategy calls RC/UNCTs to promote the uptake and application of human rights-based approaches for water and sanitation in policies and support follow-up on relevant recommendations from reports UN Special Rapporteurs.

It is not clear which Rapporteurs are referred to in this document. Secondly, the criteria to be sought in choosing recommendations from the reports of UN Special Rapporteurs as a reference for action by UN system are also unclear. Thirdly, falling short of these clarifications and also bearing in mind that the focus of this strategy should be on sustainable development, references to UN Special Rapporteurs and their reports should be deleted. These activities do not fall under the mandates of RCs and UNCTs.

viii) In the draft strategy, the role of Resident Coordinators is overstated and appears to be misleading. In accordance with the UNGA Resolution entitled “Repositioning of the United Nations development system in the context of the quadrennial comprehensive policy review of operational activities for development of the United Nations system”, Resident Coordinator is created to fulfill dedicated, independent, impartial, empowered and sustainable development-focused coordination function for the UN Development System. Therefore, RC’s do not have a role to play in human rights related matters at the national level.

Secondly, in accordance with the UNGA Resolution 75/233, entitled “Quadrennial comprehensive policy review of operational activities for development of the United Nations system” the role of Resident Coordinator is to ensure coordination and collaboration at the country level and facilitate integrated support to host Governments, in consultation with the national Government. Therefore, the role of the RCs should not be to implement the Strategy, for which there are a number of UN agencies working on the ground at the national level. The Secretariat is kindly asked to revisit those paragraphs, in particular the “country-level” sections throughout the draft, accordingly.

The document should refrain from using terms and approaches that are not intergovernmentally agreed.

C. Other Proposals

- Page 3: The document mentions that the SWS will focus on sustainable development, notably Agenda 2030, and in particular SDG 6. Goal 6 is comprised of eight targets that include drinking water (target 6.1), sanitation and hygiene (6.2), wastewater treatment and ambient water quality (6.3), water-use efficiency and level of water stress (6.4), integrated water resources management (IWRM) and transboundary water cooperation (6.5), water-related ecosystems (6.6), international water cooperation (6.a) and community participation (6.b).

We expect all targets to be written in their full form. Neither the focus nor the aim of the strategy should be to renegotiate or reinterpret Agenda 2030 or SDG6.

- Page 7, Output 1: while highlighting that there is no single United Nations agency, fund, programme, or office dedicated exclusively to water issues, it falls short of explaining the reason behind having such a system.

Due to the cross-cutting nature of water, it is even more ideal not to have a single UN agency, fund, programme, or office dedicated exclusively to water issues. While water may not be the single top priority for one agency, it is important that water is among the priorities of many
UN entities that represent the UN system in key sectors. The Strategy should aim at implementing the existing intergovernmental mandates through the different agencies.

Hence, the first para of Output 1.1 in page 7 should be revisited accordingly.