



# PHRGE Briefing Paper:

## *Voluntary Local Reviews and the Human Right to Water*

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## **About the Authors:**

This report is the product of the Program on Human Rights and the Global Economy, with input from the interdisciplinary research team for the project Water Unaffordability in the United States: Using Principles of Organizational Capacity to Understand Municipal Variation in Providing Water Access (NSF Award No. 1948790). Any opinions, findings, and conclusions or recommendations expressed in this material are those of the author(s) and do not necessarily reflect the views of the National Science Foundation.

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The Program on Human Rights and the Global Economy (PHRGE) at Northeastern University School of Law was founded in 2005 to engage in study, promotion, implementation and constructive critique of rights-based approaches to economic development and social transformation. PHRGE supports cutting edge human rights scholarship and movement-building, with particular focus on economic, social and cultural rights, and works with students to ensure that human rights perspectives will continue to be vital to future generations of scholars and advocates. This is PHRGE's sixth publication in a series on the human right to water. The other publications are: (1) The Human Right to Water: A Research Guide and Annotated Bibliography; (2) The Human Right to Water: Using Freedom of Information Laws to Understand Rising Water Rates; (3) The Human Right to Water: A Primer for Lawyers and Community Leaders; (4) A Drop in the Bucket: Water Affordability Policies in Twelve Massachusetts Communities; and (5) Disconnected: How Household Water Shutoffs in the United States During the COVID Pandemic Violate the Human Right to Water. These publications are available at <https://www.northeastern.edu/law/academics/institutes/phrge/publications/index.html>.

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# PHRGE Briefing Paper: Voluntary Local Reviews and the Human Right to Water

## Executive Summary

This briefing paper examines the treatment of the human right to water in three Voluntary Local Reviews (VLRs) prepared by U.S. cities using the framework of the UN Sustainable Development Goals (SDGs). The goal articulated in SDG 6 is “Ensure availability and sustainable management of water and sanitation for all.” Because so much of water regulation occurs at the local level, local approaches to water are critically important to reaching this goal and ensuring the human right to water.

To date, the U.S. cities that have completed VLRs are Los Angeles, New York City, and Pittsburgh. While all of these cities are to be commended for taking the step of preparing a VLR, our analysis suggests several ways in which future VLRs might be improved with respect to water. In particular, a well-executed VLR should include a gap analysis and an assessment of barriers to implementation based on an analysis of demographic data. Further, a VLR should reflect experiences of community members and be designed to facilitate participation of those most affected by specific policies.

At a time when access to safe, sufficient and affordable water is in jeopardy in the U.S., VLRs can serve an important role in establishing local baselines and setting (and achieving) human rights-informed goals. We believe that the suggestions here for improving the VLR process in these and other U.S. cities will contribute to this aim.

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## Voluntary Local Reviews and the Human Right to Water

### I. Background

In September 2015, the United Nations General Assembly (GA) adopted the 2030 Agenda for Sustainable Development (the Agenda).<sup>1</sup> The 2030 Agenda establishes seventeen Sustainable Development Goals (SDGs) to “realize the human rights of all” and “balance the three dimensions of sustainable development: the economic, social and environmental.”<sup>2</sup> Informed by human rights norms, the SDGs set general targets for each of the goals.<sup>3</sup>

Many UN member states have conducted Voluntary National Reviews (VNRs) of their progress in achieving the SDG goals, though the United States has yet to do so. At the same time, many cities and regional governments around the world – including several in the U.S. -- are conducting their own Voluntary Local Reviews (VLRs) to assess progress on the subnational level. VLRs facilitate the exchange of knowledge between local and regional governments (LRGs), with a wider goal of “kindling the sharing of experience and practices — and, ultimately, a global conversation — on monitoring and reporting on the SDGs at the local level.”<sup>4</sup>

Thus far, three U.S. cities – New York City, New York; Los Angeles, California; and Pittsburgh, Pennsylvania -- have prepared VLRs to determine how their policies and practices align with the UN SDGs.<sup>5</sup> In fact, New York City was the first local government in the world to present its VLR at the UN and it has now completed two VLR reports.<sup>6</sup> The New York, Los Angeles, and Pittsburgh VLRs cover a range of issues and specific SDGs.

Recognizing that access to water is a growing issue in the U.S., in this paper, we analyze these VLRs’ treatment of water under SDG 6, and consider the ways in which their reporting reflects – or does not reflect – the underlying human right to water that is a central pillar of SDG 6. In conducting this analysis, we are sensitive to the complex issues of translation that are inherent in the SDG’s project of quantifying progress in realizing human rights.<sup>7</sup> Because of that, we particularly highlight the human rights issue of “participation” – also a core element of the SDGs -- where quantification is relatively straightforward.<sup>8</sup> Additionally, we note areas where data collection and analysis should be improved in order to more fully assess SDG progress in human rights terms.

## II. How do U.S. Cities Address Water in their VLRs?

The 2030 Agenda expressly acknowledges water as a human right,<sup>9</sup> and SDG 6 sets out the goal of ensuring “availability and sustainable management of water and sanitation for all.”<sup>10</sup> Specific targets include “universal and equitable access to safe and affordable drinking water,” equitable access to sanitation and hygiene, water quality improvements, efficiency in water use, international cooperation, and support of local community improvements in management of water and sanitation.<sup>11</sup>

The human right to water has its own set of established benchmarks, incorporated into the SDGs by virtue of the Agenda’s embrace of the human rights framework. According to the UN, “[t]he human right to water entitles everyone to sufficient, safe, acceptable, physically accessible and affordable water for personal and domestic uses.”<sup>12</sup> Each of these components is detailed as follows:<sup>13</sup>

1. **Sufficient:** “The water supply for each person must be sufficient and continuous to cover personal and domestic uses, which comprise water for drinking, washing clothes, food preparation and personal and household hygiene.”<sup>14</sup>
2. **Safe and Acceptable:** Water “must be free from microbes and parasites, chemical substances and radiological hazards that constitute a threat to a person’s health. Water must also be of an acceptable colour, odour and taste to ensure that individuals will not resort to polluted alternatives that may look more attractive. These requirements apply to all sources of water provision, including piped water, tankers, vendor-provided water and protected wells.”<sup>15</sup>
3. **Physically Accessible:** “Water and sanitation facilities must be physically accessible and within safe reach for all sections of the population, taking into account the needs of particular groups, including persons with disabilities, women, children, and the elderly.”<sup>16</sup>
4. **Affordable:** “No individual or group should be denied access to safe drinking water because they cannot afford to pay.”<sup>17</sup>

In addition to these substantive indicators, the practices of participation, equality, and accountability are key components of a human rights-based approach.<sup>18</sup>

At their best, VLRs should incorporate both the SDG targets and the human rights framework that supports them, speaking to both sustainability and individual rights. The two New York VLRs explicitly acknowledge the human rights frame, while the other two cities’ VLRs are silent on human rights. Still, evidence of the human rights framework may be found in their approach and analysis, despite the absence of explicit human rights language. To explore the role of human rights in these VLRs, the chart below and the analysis that follows examine how each U.S. city’s VLR addresses the intersections between SDG 6 and the human right to water.

## The Intersections of SDG 6 and Human Rights in Three Voluntary Local Reviews<sup>19</sup>

City	New York, New York (2018)	Pittsburgh, Pennsylvania (2020)	Los Angeles, California (2019)
<b>Sufficient</b>	New York City efficiently delivers water services to residents based on “understanding of local water cycles and an appreciation for the contributions of smaller-scale, decentralized projects aimed at optimizing the performance of existing large-scale systems.”	Pittsburgh provides water and sanitation services to over 300,000 residents.	Los Angeles faces unique obstacles in maintaining a continuous supply of water to residents because the region is prone to drought. The city’s review highlights its Emergency Drought Response, which features efforts to decrease water usage, increase efficiency, and to preserve the city’s fresh water supply. Stormwater capture is also identified as a means to increase water supply.
<b>Safe and Acceptable</b>	New York City ensures compliance with Safe Drinking Water Act and periodic testing for contaminants. The City’s drinking water system is the largest unfiltered water supply in the world because of its “high quality.”	Pittsburgh aims to reduce lead levels in drinking water by replacing lead pipes.	The review anticipates water quality improvement by reducing street runoff and pollution, reducing river pollution, and capturing stormwater.
<b>Physically Accessible</b>	Not discussed.	Not discussed.	The review sets a goal to provide drinking water access and hydration stations in municipally-owned buildings public properties “in areas of highest need.” LA also contemplates development of housing equipped with or with access to sanitation facilities for people experiencing homelessness.
<b>Affordable</b>	New York City asserts that its water and wastewater service costs are below the national average, but anticipates higher costs from	Pittsburgh provides financial relief for low-income residents, a winter shutoff	LA’s review identifies goals to develop affordable housing and accessible sanitation facilities.

	<p>maintenance of wastewater systems and water quality mechanisms. “In order to balance the goals of investment and equity going forward, the Department of Environmental Protection (DEP) will continue to develop rates that support policy goals, and will invest in the technology to support innovative fee structures. The City will update the water and wastewater billing system, and evaluate its financial framework to ensure we have a sustainable financial model.”</p> <p>Additional mechanisms to ensure affordable water services include accurate metering, its Water Debt Assistance Program, credits to low-income homeowners, and credits to low-income housing projects.</p>	<p>moratorium for water services, and a cash assistance program for those unable to pay their water bill.</p>	<p>The review sets a goal to provide drinking water access and hydration stations in municipally-owned buildings public properties “in areas of highest need.”</p> <p>LA also contemplates development of housing equipped or with access with sanitation facilities to people experiencing homelessness. LA also anticipates assistance to customers for on-site plumbing issues such as old drinking water pipes and drought planning mechanisms.</p>
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### III. Analysis

To evaluate cities' fulfillment of human rights objectives in their treatment of SDG 6, we draw on authoritative guidelines from the UN Department of Economic and Social Affairs (DESA). Our analysis suggests that, going forward in their VLR processes, cities should place greater emphasis on broad participation, appreciation for diverse experiences of water and sanitation access, and comprehensive data collection. Expanding these elements would begin to turn the VLR process from a rote metric reporting exercise to the transformative process that the 2030 Agenda envisioned, incorporating both sustainability and human rights.

#### a. DESA Global Guidelines for Inclusivity in Preparing VLRs

DESA's "Global Guiding Elements for Voluntary Local Reviews of SDG Implementation" (DESA Elements) offer a framework for VLR assessment based on the SDG guiding principles.<sup>20</sup> DESA emphasizes "[r]ather than an end in itself, the VLR should be seen as a process by which cities and regions take stock of and assess their progress and shortcomings in implementation of the goals and targets through an inclusive process engaging in all relevant actors."<sup>21</sup> This call for an inclusive process tracks the principles for participation found in the 2030 Agenda as well as the fundamental human right to participation.<sup>22</sup> Each of the three U.S. cities can improve their VLRs by enhancing their consideration of inclusion in the context of the human right to water.

#### i. Inclusive Participation

Each of the VLRs address participation to varying degrees. Los Angeles aims "to recognize innovative efforts outside the City and the public sector, and source great ideas from all of our neighbors here in the creative capital of the world" in its SDG implementation efforts, but provides a detailed discussion of these stakeholders for just two "priority goals" and summaries for six others, not including SDG 6.<sup>23</sup> While SDG 6 is closely related to, and interconnected with, the SDGs addressing poverty, housing, climate and other sustainability goals, water and sanitation also pose unique challenges that merit specific consideration.

Pittsburgh offers more detail regarding its methodology for collecting input, including a survey, a series of roundtable discussions, and follow-up meetings.<sup>24</sup> However, these activities were only open to City employees and the SDG team, and they failed to collect input from stakeholders outside of the public sector.<sup>25</sup>

Of the VLRs prepared by U.S. cities, New York's two VLRs include the most comprehensive discussions regarding methodologies for collecting input. New York's methodologies include direct resident outreach, surveys, an advisory board, coordination with other municipalities in the region, community discussions, and more.<sup>26</sup> However, New York does not provide a complete list of those stakeholders nor does it indicate the extent to which this input was incorporated into its VLRs.<sup>27</sup>

All three cities can improve their VLRs by working to elicit the input of a broader range of stakeholders and documenting the stakeholder input process more



thoroughly. First, cities should identify the stakeholders whose input would benefit the VLR and explain the rationale behind those selections, while also ensuring opportunities for inputs from new and unplanned sources. The VLR should provide information about the particular sources of input and the means used to gather it. Further, the VLRs should illustrate the connections between the input collected, i.e., which sector of stakeholders provided it, and how the input informed the VLR process.

The cities should demonstrate that they consulted stakeholders from multiple sectors, including members of government, non-profit organizations, private sector actors, community groups, and residents. Pittsburgh, for example, should extend its surveys, roundtables, and meetings to actors outside of government. Civil society groups such as Pittsburgh United may provide invaluable contributions to the city's review of SDG Goal 6, given the organization's participation in the Our Water Campaign for "safe, affordable, publicly-controlled water for all."<sup>28</sup> Similarly, Los Angeles may benefit from including the OurWaterLA coalition, and New York from the participation of the NGO Community Voices Heard.<sup>29</sup> Involving participation from all levels of stakeholders and demonstrating that involvement in the VLRs will ensure that cities fulfill both SDG and human rights objectives.

## ii. Centering People, Human Rights, and Vulnerable Communities

Water is guaranteed to residents as a human right in a number of UN member states. Germany, for example, affirmed its position in its VNR, where it stated unequivocally that "access to safe drinking water and to sanitation – universal human rights – are guaranteed in Germany."<sup>30</sup> As demonstrated in the above table, the U.S. VLRs have ample room to improve regarding their assurance of accessible and affordable water under the human rights framework.

All three cities likewise fell short in addressing the intersections between the human right to water and residents' race, ethnicity, gender, ability, and economic status.<sup>31</sup> The documents we reviewed made no mention of differential access to water among these demographic groups, nor did they say whether they even collect data in order to detect inequities that may be present. In order to adequately affirm the right to water for all, reviewing cities must explicitly research, remedy, and monitor disparities along those intersections of identities. Canada's VNR, for example, specifically addresses the inequity in access to clean water for Indigenous people.<sup>32</sup>

A municipality's efforts to center people in its human rights decision-making are perhaps even more impactful of all, as smaller units of government have a higher capacity to tailor such efforts to the unique needs of their communities. In these three cases, however, the cities failed to adequately explain how access to clean, affordable, acceptable, and sufficient water is or is not guaranteed for vulnerable populations, such as BIPOC communities, the elderly, disabled people, women, those falling outside of the gender binary, low-income communities, and children.<sup>33</sup> In order to fulfill the SDG principles at the local level, it is imperative that a reviewing city explicitly identify the particular

communities most impacted by inadequate access to water and center those communities in its efforts to formulate and meet SDG goals.

### **iii. Thorough and Inclusive Data**

A successful VLR should contextualize the locality's efforts as compared with national data in order to facilitate understanding of both local and national progress. In evaluating SDG 6, a city should engage in rigorous fact-finding to determine where it has satisfied its duty to ensure the human right to water and where it has failed to do so. This involves the collection of demographic data for those impacted by water shut-offs, late fees, infrastructure failure, inability to pay water bills, contamination, and insufficient access. Such data should be continually monitored and tracked over time to inform the VLR process. Cities can then use these data to tailor their SDG 6 efforts to community needs, while comparing their own progress with regional and national trends. Understanding these trends will allow cities to fulfill corresponding SDG policies and goals and ultimately support a more informed and integrated national approach to the 2030 Agenda.

### **b. Policy and enabling environment**

The process of continual review will only be successful if cities expressly address the whole of their situations. The DESA Global Guiding Elements implore cities to prepare their VLRs in context, responding to and reporting on factors such as the city's relationship with the national government, public awareness of sustainability issues and the SDG process, local and regional frameworks, inclusivity, institutional mechanisms, and structural issues.<sup>34</sup> Because VLRs are meant to evolve over time, it is imperative that cities map all entities that they affect or have an effect on, even if there are currently no solutions in place to overcome existing obstacles. Particularly, the DESA Guiding Elements instruct cities to conduct gap analyses, evaluate policy coherence, and report on obstacles in implementing the 2030 Agenda.<sup>35</sup>

Gap analysis may aid cities in fulfilling the SDGs by highlighting those residents and issues receiving less attention, allowing cities to revisit their SDGs targets in light of their existing efforts. Equally important is policy coherence, both within the city and involving surrounding regions, states, and the national government.<sup>36</sup> In the context of SDG 6, cities may assess federal, state, and local programs supporting the human right to water alongside existing obstacles within the city and beyond, and may also expand their analysis to examine relevant efforts under related SDG goals such as housing or poverty. Finally, a city should include an appraisal of existing institutional barriers to SDG implementation.<sup>37</sup>

The unavailability of certain data can have drastic impacts on a city's plans to ensure the human right to water. For example, cities with water discounts for homeowners only may effectively discriminate against residents who rent their homes, a distinction that often falls along racial lines. If data on the intersections between race and water affordability are unavailable to a city, the city risks allowing a policy's discriminatory impact to perpetuate. For these reasons, a holistic and integrative approach is

necessary to a city's preparation of its VLRs. Conducting gap analyses, evaluating policy coherence, and reporting on barriers to SDG implementation are just a few of the approaches cities can use to ensure that their VLRs are comprehensive and contextualized.

#### **IV. Conclusion**

To address the human right to water in its VLR assessment of SDG 6, a city must conduct a comprehensive evaluation of all factors affecting the right. Cities should be sure to collect information from all connected stakeholders, center the most vulnerable residents and communities, and engage in comprehensive and impartial factfinding. While preparing VLRs, cities should thoroughly assess the context surrounding each element by conducting gap analyses, assessing policy coherence, and identifying institutional barriers to SDG implementation. In cities' efforts to fulfil the mandates of SDG 6, it is imperative that the human right to water is acknowledged and secured for all.

VLR preparation is an opportunity for cities to ensure that their residents' needs are not only recorded, but that local policies are set on a path toward rights realization. It is also an important opportunity for local NGOs, advocates and residents to have a voice in policy formulation and implementation. For these reasons, thorough and thoughtful VLR preparation is essential to securing the human right to water at every level of government. As more U.S. cities prepare VLRs, and as New York, Los Angeles and Pittsburgh revise their reports going forward, all of the actors at the local level of government, including both residents and official actors, have an opportunity to use this process to go beyond data gathering and reporting. Using a human rights based approach, VLRs provide an opportunity to transform local practices in ways that will have long term benefits for residents, informing national policies and promoting sustainability into the future.

We – local governments and residents alike -- should seize the moment.

## Endnotes:

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<sup>1</sup> G.A. Res. 70/1, at 1 (Sept. 25, 2015).

<sup>2</sup> *Id.*

<sup>3</sup> *Id.* at 13.

<sup>4</sup> Andrea Ciamba, GUIDELINES FOR VOLUNTARY LOCAL REVIEWS, VOLUME 1: A COMPARATIVE ANALYSIS OF EXISTING VLRs 7–8, July 2020.

<sup>5</sup> U.N. DEPT. OF ECON. AND SOC. AFFAIRS, VOLUNTARY LOCAL REVIEWS, [HTTPS://SDGS.UN.ORG/TOPICS/VOLUNTARY-LOCAL-REVIEWS](https://sdgs.un.org/topics/voluntary-local-reviews).

<sup>6</sup> Anthony F. Pipa, Max Bouchet & Landon Webber, *A Conversation with Chris Castro, director of sustainability and resilience for Orlando*, BROOKINGS (Aug. 11, 2020). Orlando, Florida has indicated that it will also prepare a VLR in the near future. *Id.*

<sup>7</sup> Sharmila Murthy, *Translating Legal Norms into Quantitative Indicators: Lessons from the Global Water, Sanitation and Hygiene Sector*, 42 WILLIAM & MARY ENV. L. & POL'Y REV. 385 (2018).

<sup>8</sup> See, e.g., SDG 16.7.

<sup>9</sup> G.A. Res. 70/1, at 3–4 (Sept. 25, 2015).

<sup>10</sup> *Id.* at 1.

<sup>11</sup> *Id.* at 18–19.

<sup>12</sup> Comm. on Economic, Social and Cultural Rights, General Comment No. 15: The Right to Water on its Twenty-Ninth Session, UN Doc. E/C.12/2002/11 (2003).

<sup>13</sup> U.N. HUM. RTS., FACT SHEET NO. 35: THE RIGHT TO WATER 4.

<sup>14</sup> *Id.* at 8.

<sup>15</sup> *Id.* at 9.

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> UN Sustainable Development Group, *Human Rights Based Approach*, <https://unsdg.un.org/2030-agenda/universal-values/human-rights-based-approach>.

<sup>19</sup> The VLRs cited here are: Los Angeles, <https://sdg.lamayor.org/our-work/voluntary-local-review>; New York City, [https://www1.nyc.gov/assets/international/downloads/pdf/NYC\\_VLR\\_2018\\_FINAL.pdf](https://www1.nyc.gov/assets/international/downloads/pdf/NYC_VLR_2018_FINAL.pdf); and Pittsburgh, <https://sdgs.un.org/sites/default/files/2020-12/Pittsburgh%20VLR%202020%20Final%20Draft.pdf>. New York City also prepared a VLR in 2019, but because SDG 6 was not explicitly discussed in the later VLR, we rely on the 2018 version for purposes of this analysis. The 2019 New York City VLR can be found at <https://sdgs.un.org/sites/default/files/2020-09/International-Affairs-VLR-2019.pdf>.

<sup>20</sup> See GLOBAL GUIDING ELEMENTS FOR VOLUNTARY LOCAL REVIEWS (VLRs) OF SDG IMPLEMENTATION, U.N. DEPT. OF ECON. AND SOC. AFFAIRS, 23 Dec. 2020.

<sup>21</sup> *Id.*

<sup>22</sup> G.A. Res. 70/1, at 32 (Sept. 25, 2015).

<sup>23</sup> OFF. OF INT'L AFF. & CITY OF L.A. INFO. TECH. AGENCY, LOS ANGELES SUSTAINABLE DEVELOPMENT GOALS 6, 12 (2019) [hereinafter L.A. VLR].

<sup>24</sup> Kaitlin Pendrak & Tyler Viljaste, PITTSBURGH AND THE SUSTAINABLE DEVELOPMENT GOALS: A VOLUNTARY LOCAL REVIEW OF PROGRESS 6–7 (2020) [hereinafter P.G.H. VLR].

<sup>25</sup> P.G.H. VLR 6–7

<sup>26</sup> N.Y.C. MAYOR'S OFF. FOR INT'L AFF., VOLUNTARY LOCAL REVIEW: NEW YORK CITY'S IMPLEMENTATION OF THE 2030 AGENDA FOR SUSTAINABLE DEVELOPMENT 15–16 (2018) [hereinafter N.Y.C. VLR 2018]; NEW YORK CITY MAYOR'S OFFICE FOR INTERNATIONAL AFFAIRS, VOLUNTARY LOCAL REVIEW: NEW YORK CITY'S IMPLEMENTATION OF THE 2030 AGENDA FOR SUSTAINABLE DEVELOPMENT 16–17 (2019) [hereinafter N.Y.C. VLR 2019].

<sup>27</sup> See N.Y.C. VLR 2018; N.Y.C. VLR 2019.

<sup>28</sup> PITTSBURGH UNITED, OUR WATER CAMPAIGN, <https://pittsburghunited.org/ourwater/> (last visited May 20, 2021).

<sup>29</sup> See ABOUT, OURWATERLA, <https://ourwaterla.org/ourwaterla-about-us/> (last visited May 20, 2021); COMMUNITY VOICES HEARD, <https://www.cvhaaction.org/> (last visited June 21, 2021).

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<sup>30</sup> GOV'T OF GER., REPORT OF THE GERMAN FEDERAL GOVERNMENT TO THE HIGH-LEVEL POLITICAL FORUM ON SUSTAINABLE DEVELOPMENT 2016 30 (2016).

<sup>31</sup> See L.A. VLR; N.Y.C. VLR 2018; N.Y.C. VNR 2019; PGH VLR.

<sup>32</sup> GOV'T OF CAN., CANADA'S IMPLEMENTATION OF THE 2030 AGENDA FOR SUSTAINABLE DEVELOPMENT: VOLUNTARY NATIONAL REVIEW 53 (2018). "Access to water for drinking and sanitation in Canada is nearly universal and generally of good quality. Access to clean water, however, has yet to be secured for all Canadians. Perhaps for no one is this inequity more persistent than for Indigenous peoples in Canada." *Id.*

<sup>33</sup> See GLOBAL GUIDING ELEMENTS FOR VOLUNTARY LOCAL REVIEWS (VLRs) OF SDG IMPLEMENTATION, U.N. DEPT. OF ECON. AND SOC. AFFAIRS, 23 Dec. 2020.

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

<sup>37</sup> *Id.*