



Decolonising water resource allocations: towards a typology of experiences in small island developing states

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ABSTRACT

This paper explores the role of colonial legacies on contemporary water resource allocations in Small Island Developing States (SIDS) and current experiences with decolonisation processes. Drawing on three case studies – Mauritius, Papua New Guinea, and Cabo Verde – the article provides a typology of SIDS' experiences in decolonising their water resources – maintenance of the status quo, *de jure* but no *de facto* change, and *de facto* change. The paper argues that differences in decolonisation outcomes can be partly explained by the existence of Indigenous populations prior to colonisation, as well as the relative abundance of water resources. The findings highlight the context-specific nature of decolonising water resources and caution against one-size-fits-all approaches pushed by international institutions. The paper calls for further research on how global financial and aid agencies influence water governance in postcolonial SIDS contexts, where fiscal constraints and dependence on external actors pose additional challenges to equitable water allocations.

1. Introduction

Water allocation refers to the distribution of water resources among different users and uses. As a facet of water governance, defined by its institutional frameworks and processes (Jiménez et al., 2020), it is a deeply political issue shaped by historical legacies, economic interests, and existing power structures (Schulz et al., 2017). In postcolonial societies, the question of specific colonial legacies must also be added. Because colonial power relations often persist into independence (Ndlovu-Gatsheni, 2013), there is a need to understand the impact on contemporary water governance and hence allocation. The decolonisation of water governance is receiving increasing attention. It challenges colonially inherited frameworks that privilege certain groups whilst marginalising others (RiverOfLife et al., 2021) and calls for the incorporation of Indigenous knowledge and strengthening of Indigenous participation (McKibbin, 2023).

Many former colonies struggle with the legacies of colonially inherited water governance models until today. Colonialists engaged in destructive hydrological projects which radically transformed waterscapes by diverting rivers for irrigation (Gibbs, 2009). This disdain for water can be linked to the colonial conception of natural waterscapes as

'aqua nullius', water belonging to no one, and hence water that can be (ab)used as needed for the colonial project (O'Donnell, 2023). Today, colonial legal frameworks and approaches to infrastructure development persist, resulting in social and economic inequities affecting local communities (Marcatelli and Büscher, 2019; Claire and Surprise, 2022).

Whilst the recognition of colonial legacies on water resource governance and the therefrom resulting need for decolonisation is a welcome development, the specific case of Small Island Developing States (SIDS) has until now been neglected. This is regrettable as SIDS face unique challenges due to their specific characteristics and are recognised by international institutions as a special case, both in terms of environment and development (Bishop et al., 2025). Generally, SIDS have small land masses. The resulting narrow resource base is therefore under increased pressure and diversifying the economy is difficult. SIDS' small GDP restricts public spending. Import dependence goes together with high transportation costs because of SIDS' remote location. Despite accelerating urbanisation, much of their population still lives in rural areas, which can increase pressures on resources such as land and water due to overuse and an expansion of agricultural activities (United Nations, 2019).¹ Also, because many SIDS comprise of scattered islands and their populations include the descendants of former slaves and

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¹ For example, the rural population in Papua New Guinea is 87%, Samoa 82%, Solomon Islands 76%, Guyana 74%, Timor-Leste 70%, Mauritius 59%, Guinea-Bissau 57%, Belize 55%, Trinidad 47%, Haiti 45%, Fiji 44%, Cabo Verde 35%, São Tomé and Príncipe 27% (United Nations, 2019).

indentured labourers from various regions, they are ethnically rich and display a variety of cultures, languages, and customs (Mustafa and Reeder, 2009; Jackson and Palmer, 2012).

Because of these specificities, SIDS offer a unique opportunity for interrogating the foundational assumptions of dominant water governance and decolonisation discourses. Much of the existing literature on water governance assumes economies of scale and institutional coherence and capacity (Allouche, 2016; Molle, 2009), whilst debates on water and colonialism have mainly focused on larger, continental contexts (Ross, 2024). These accounts often fail to translate to SIDS, characterised by insularity, limited scale, and distinct vulnerabilities. SIDS then reveal the limits of existing theoretical frameworks, underscoring the need for more context-sensitive, place-based approaches. In particular, the intersection of colonial legacies and SIDS-related constraints offers a rich terrain for exploring how water governance is shaped by both historical and material conditions.

Although the literature on water challenges confronting SIDS has increased over the years (see Falkland (1999) for a seminal overview), there is a lack of literature on the continued influence of colonial legacies on water resource allocations in SIDS today. We therefore endeavour to provide a typology of the experiences of SIDS in addressing these legacies and enquire what scope exists for decolonising water resource allocations. To do so, we study the cases of three SIDS, each exemplifying a distinct experience with decolonising its water resources. Mauritius, a former British colony in the Indian Ocean, embodies the case of a strict status-quo of colonial water resource allocations benefitting the descendants of the colonial elite. Papua New Guinea, a former Australian colony in the Pacific Ocean, North of Australia, presents a case of successful decolonisation of water resource allocation, with customary rights often overriding formalised rights. Cabo Verde, a former Portuguese colony and archipelago off the West coast of Africa, represents an intermediary case where important changes to water governance have been made, albeit with mixed results. Comparing these cases allows us to achieve insights into how decolonisation efforts have unfolded in different contexts.

The authors, born, raised, and educated in Europe, are academics based at a UK university with a longstanding research interest in access to natural resources in the Global South. We approach this topic with a critical awareness of our positionality within the structures of global knowledge production. Our engagement with the case studies stems from our respective experiences: the second author lived in Mauritius for five years and conducted extensive research on the island's water issues, while the first author carried out lengthy fieldwork in rural India on the struggles of marginalised communities to access natural resources. Building on these backgrounds, and inspired by Mauritius' experiences with decolonising water, we developed a shared interest in interrogating structural inequalities and exploring more equitable approaches to resource allocation across.

The selection of additional SIDS was guided by four criteria: 1) The country is classified as a SIDS; 2) it has a colonial history and is now independent; 3) it possesses rivers as sources of fresh water; and 4) there is existing academic literature and secondary data related to water rights, allocation, and governance available online for that country. This led to an initial study of eight cases, from which Cabo Verde and Papua New Guinea were selected to complement the Mauritian case and illustrate diverse postcolonial trajectories in water allocation.

This research is informed by a decolonial lens that seeks to move beyond dominant economic framings of natural resources. We aim to understand how SIDS have dealt with resource allocation, particularly in contexts where structural inaccessibility excludes those unable to pay. This pattern—which we observed in previous studies in Mauritius, India, and the UK—reflects broader systems of accumulation and exclusion.

We acknowledge the limitations of our methodology, which relied largely on secondary data available online and in books accessible through our university library, particularly for data on Cabo Verde and Papua New Guinea. We recognise that this approach may have excluded

locally produced knowledge and studies not digitised. While our primary use of English-language academic sources reflects institutional constraints, we recognise that this also highlights the dominance of English in global academic discourse—a dynamic that itself has been criticised within decolonial scholarship.

The paper proceeds as follows. The next section provides an overview of the water challenges in SIDS and reviews the governance of water resource allocations during and after colonisation, before discussing the concept of decolonisation of water resources. Thereafter follow the three case studies with an ensuing discussion highlighting commonalities relating to social and environmental challenges, before contrasting differences in colonial influence and approaches to reform. The final section concludes.

2. Challenges, history, and decolonisation of water allocation

2.1. Water challenges in small island developing states

All over the world, a wide range of factors and developments increase pressures on water resources. These various factors usually do not appear in isolation but mutually reinforce each other. Climate change imperils both quantity and quality of water resources through increased temperatures, less and more intense rainfall and more extreme weather events (Ciampittiello et al., 2024). It thereby exacerbates problems of pollution from economic activities which lead to increased contamination with chemicals, micro-plastics, and untreated effluents. This not only threatens the quality of water resources but also requires advanced technologies for the provision of safe drinking water (Gude, 2021). Especially in mega-cities, increasing urbanisation raises demand for water (Paiva et al., 2020). As a consequence, these various challenges require institutional reforms for more effective and fairer water governance (Closas and Villholth, 2020).

These issues intensify further in the context of SIDS due to their specific characteristics (Cosgrove and Cosgrove, 2012; Cashman, 2014). Facing already all of the above challenges more severely, the impact of climate change in SIDS also poses the threat of saltwater intrusion into groundwater tables, which would make it unsuitable for human consumption (Lathashri and Mahesha, 2016), as well as a reduction of recharge rates, leading to the depletion of underground sources over time (Holding et al., 2016). SIDS are also more vulnerable to extreme weather events, with climate change increasing their frequency. Cyclones risk damaging water infrastructure and polluting resources, droughts reduce generally already scarce water resources further, and floods, including flash floods from heavy rainfall, contaminate water through sedimentation in water sources and disrupt water supply (Falkland, 1999).

Furthermore, because of their smallness, public budget pressures and challenges to diversify economic activity are particularly severely felt in SIDS. Amplified by the high population density² due to limited geographical size and an increase in urbanisation, per capita consumption of water is rising (Cashman, 2014). This increases competition between alternative water uses and results in water being directed towards activities that hold promise to boost economic development. In consequence, agriculture intensifies – also to tackle high dependency on food imports – and creates a heightened risk of water resource pollution through fertilisers and pesticides as well as depletion (Gohar et al., 2019). Similar effects can be observed from expanding tourism (van der Velde et al., 2007), with tourists generally using three times as much water as the local population (Cashman, 2014) which creates particular

² For example, global population density in people per km² is 61, compared to Mauritius 634, Haiti 415, Trinidad and Tobago 297, Sao Tome and Principe 232, Cabo Verde 146, Timor-Leste 89, Samoa 79, Guinea-Bissau 73, Fiji 51, Solomon Islands 25, Papua New Guinea 22, Belize 18, Guyana 4 (World Bank, 2021).

problems in dry seasons.

All these issues are further exacerbated by the severe budgetary pressures and limited fiscal space for financing and maintaining water and other infrastructure projects. Infrastructure costs are higher than in non-SIDS, due to their geographical isolation and often dispersed populations. Papua New Guinea for instance spends annually 11% of its GDP on infrastructure (Branchoux et al., 2018), whilst most countries in the world spend well under 2% (World Population Review, no date). Particularly problematic is the provision of water infrastructure as pipes, pumping stations and other components of water distribution absorb 80 to 85% of the entire cost of water provision (Pagayona and Honra, 2024). In the context of SIDS' remoteness and limited economic diversification, these components often have to be imported with high transportation costs and paid for with precious foreign exchange.

Moreover, in light of these high sunk costs and the lack of economies of scale – often a consequence of small and dispersed populations – maintenance and operation of water infrastructure are frequently underfunded and neglected. One indicator to measure these issues is to look at non-revenue water (NRW, see Table 1), which measures the amount of water fed into the distribution system but not generating any revenue due to physical losses (e.g. leaky pipes) and commercial losses (e.g. illegal connections or faulty water meters). With a few exceptions, SIDS have very high NRW-rates. Singapore, with a mere 4%, represents the best-case scenario for managing NRW.

This short overview shows that SIDS face a common number of factors that increase water stress. With climate change intensifying these issues even further, water resource governance in SIDS becomes a primordial topic. However, institutional path dependence in water resource governance implies that trajectories of reforms are constrained by past institutional arrangements (Marshall and Alexandra, 2016). The next subsection therefore explores colonial and postcolonial governance arrangements.

2.2. A brief history of water resource allocation

Customary water allocation systems are diverse and generally unwritten, continuously changing, and highly localised, making it challenging to generalise their governance across small island states. Countries uninhabited prior to colonisation can also have customary systems based on customs held by migrant workers brought in by the colonisers (Coissoro, 1984). However, some shared elements include the perception of water as a common pool resource with undefined property

rights and responsibilities (White et al., 2007; Jackson and Palmer, 2012). In customary systems, water cannot be owned – due to the fleeting nature of the resource – and the use of water by one person cannot interfere with another person's water use (Sattar, 2022). Furthermore, customary water allocations are often based on strong interdependent relationships between water and communities (White et al., 2007; Jackson and Palmer, 2012). Consequently, customary water allocations tend to be community-managed and highly localised. For example, in Papua New Guinea, clan members exercise rights to use riparian water from the clan and can exclude non-clan members from its use (Kalinoe, 1998b) and in Guyana, water use is arranged according to community consensus, specifically during shortages (Janki, 2010). Recognition of custom in water allocation management thus emphasises the active involvement of communities.

During colonialism, such customary water allocation systems were often replaced by colonial laws. For example, Timor-Leste gained independence in May 2002 after 24 years of Indonesian rule and about 500 years of Portuguese occupation, during which local traditions remained strong under indirect Portuguese colonialism but were repressed during Indonesian rule (Jackson and Palmer, 2012). In Guyana, the legal system transitioned from Roman-Dutch to a mix of Dutch and English laws after Britain became the colonial government in 1803, with English law eventually replacing Dutch law in the early 20th century, though rights over water largely remained based on Roman-Dutch law (Janki, 2010). Thus, the influence of colonial rule on local water allocation and management practices varied across regions, reflecting the complex and often contested nature of water resource allocation under imperial governance.

Upon independence, many small island states drafted their constitutions based on colonial legislation but also included the recognition of custom. For instance, Papua New Guinea adopted English Common Law upon independence in 1975, but incorporated water-related changes in its constitution to recognise water rights based on a combination of clearly defined laws and undefined customary rights (Kalinoe, 1998b). Likewise, the Solomon Islands' constitution applied English common law but with the addition of constitutional recognition of customary law (Rodd, 2016). However, even with the recognition of customary laws on an equal basis with formal legislation, drawing upon these customary laws in courts is challenging as lawyers and judges are often trained only in formal law (Rodd, 2016). One of the main reasons for the difficult integration of living custom and statutory law is that colonisers regarded water merely as a resource for irrigation, sanitation, and water supply,

Table 1

Non-revenue water in SIDS. Source: authors' compilation based on Liemberger and Wyatt (2018, 2019) and World Bank.

Low-income	NRW %	Lower-middle-income	NRW %	Upper-middle-income	NRW %	High-income	NRW %
Guinea-Bissau	45	Cabo Verde	33	Belize	24	American Samoa	60
Average	45	Comoros	40	Cuba	40	Antigua and Barbuda	40
		Fed. St. of Micronesia	67	Dominica	40	Aruba	40
		Haiti	40	Dominican Republic	40	Bahamas	34
		Kiribati	50	Fiji	51	Barbados	55
		Papua New Guinea	36	Grenada	40	Bermuda	40
		Samoa	62	Jamaica	50	British Virgin Islands	40
		São Tomé and Príncipe	40	Marshall Islands	30	Cayman Islands	18
		Solomon Islands	62	Mauritius	52	French Polynesia	28
		Timor-Leste	60	St. Lucia	40	Guam	55
		Vanuatu	18	St. Vincent & the Gren.	40	Guyana	60
		Average	46	Suriname	40	Nauru	40
				Tonga	25	New Caledonia	40
				Tuvalu	40	Northern Marianas	70
				Average	41	Palau	50
						Puerto Rico	62
						Seychelles	14
						Singapore	4
						St. Kitts and Nevis	40
						Trinidad and Tobago	45
						Turks & Caicos Islands	40
						U.S. Virgin Islands	40
						Average	43

ignoring “[t]he aesthetic, cultural, spiritual, and ecological values that the local societies ascribed to water” (Mustafa, 2022b). This means that customary laws are often entirely in contradiction with formal laws.

Other countries did not merely reform their constitutions upon independence but abolished all colonial laws entirely, examples include Cabo Verde, Fiji, and Barbados. However, despite abolishment, the colonial laws still impacted the new, independent legislation (Bosa, 2015), for example through civil servants who stayed on after independence but who were trained in accordance with colonial practices, norms, and models (Rodd, 2016). Abolishing or reforming colonial laws also does not eradicate the accumulation of property and power established during colonialism among certain individuals or communities, nor does it prevent the formation of new structures of power (Maziki Thame, 2014; Keese, 2017). The colonial experience thus created legacies that impacted patterns of inequality and injustice within the now independent states (Bishop et al., 2025). These colonial legacies impact water management, rights, access, and allocation.

In most countries today, there are important differences in water as property between types of water resource, especially between surface water from rivers and lakes and groundwater. Surface water is in many small island states considered a common pool resource with undefined property rights and responsibilities (White et al., 2007). In countries where it is not a common pool resource, for example in Timor-Leste, surface water will more likely belong to the state, who is responsible for water allocation, restrictions, and protection (Jackson and Palmer, 2012). Groundwater, however, is more likely considered private and associated with the ownership of the land from where the groundwater is extracted (Water Global Practice, 2018). Thus, surface water can generally not be privately owned, while ownership of groundwater is linked to landownership.

Another common distinction exists between urban and rural water allocation. For example, Belize established the Belize Water and Sewage Authority in 1970 under the Water and Sewerage Act for urban water supply (Mustafa and Reeder, 2009), while placing the responsibility of rural water supply with Village Water Boards (Grau and Rihm, 2013). However, urban, *peri*-urban and rural water are linked, with rural water being piped to supply urban water and water flowing out of urban areas affecting rural water quality, leading to regional differences in water access and control (Hommes et al., 2019). Consequently, accelerating urbanisation is leading to increased competition between urban and rural water allocations (Garrick et al., 2019). Governance of water allocation in rural, *peri*-urban, and urban areas thus may be distinct but bring in a risk of increased competition and increased inequality if interlinkages between regions are not seriously considered.

2.3. Decolonising water resource allocations

Calls for decolonisation came as a call for independence among anticolonial thinkers. However, independence does not mean that decolonisation has been achieved. Fanon (1961) argued that the peoples of newly independent states become somewhat disillusioned by independence as progress, change, and eradication of inequality and poverty is not happening at the speed they expected. However, this slow movement is not surprising as Fanon (1961) also points out that colonialist countries gained their economic welfare by extracting from their colonies, leaving them in a state of depletion, and thus forcing the new state to start their independence with a regime of austerity.

Furthermore, while development is not linear and can take many complex forms, directions, ideals, and approaches (Calori & Spaskovska, 2021), as the case studies discussed later also demonstrate, colonial influences and ideologies did not evaporate with independence (Zadeh-Cummings, 2022). For instance, the new ruling classes in independent states had interests closer to the European colonisers than to the non-white majority, and the new ruling class continued to enjoy privileges by dominating the non-white communities (Quijano, 2000). Besides safeguarding interests, colonised intellectuals have been heavily

influenced by colonial thinking, and this obscures the values, needs, and interests of the majority of the Indigenous population (Fanon, 1961). The elite in post-colonial countries reproduced these ideologies into the newly independent states, resulting in a change of government but not in a change of way of living, thus keeping the status quo (Figuerola Helland and Lindgren, 2016). Such reproduction of colonial ideologies is central to decolonial thinking, which, according to Roca-Servat et al. (2021), suggests that at the end of colonialism, “the coloniality of power, knowledge, being and nature” was reproduced and consequently global South communities continue to be oppressed (2021, p.4). The colonial legacy thus resulted in a division at economic, social, and ideological levels between those in power and the masses of the newly independent states.

Therefore, postcolonial studies continue to be critically concerned with the processes of decolonisation and the ongoing colonial legacy (Goyal, 2023). Pyndiah (2016) argues that decolonising means to critically negate remnants of colonisation, including colonial legacies within the post-independence systems of governance. This would include decolonising narratives, knowledge, and practices (Germond-Duret, 2022) by revealing the injustices, exploitations, and appropriations occurring in contexts of unequal power relations and discern the various alternative ways in which communities conceive the natural world (Roca-Servat et al., 2021). According to Fanon (1961), successful decolonisation involves changing social structures, in its entirety, from the bottom up. As such, anticolonial thought has the aim to critique as well as to reconstruct (Getachew and Mantena, 2021).

The decolonisation of water resources has received some scholarly attention. Several recent case studies, including Pakistan (Mustafa, 2022b, 2022a), the United States of America (Curley, 2019), Sub-Saharan Africa (Van Koppen and Schreiner, 2018), and Australia (Burdon et al., 2015), have turned their attention towards decolonising water law and emphasise the need to involve local or indigenous communities in policy making in which living custom is given an equal standing to statutory law to undo social, political, and economic power structures.

However, decolonising water is not just about involving local communities in law and policy making. One of the main challenges for postcolonial studies today, according to Goyal (2023), is to pay attention to the continued, but now more hidden, presence of empire “across new and old arenas of conquest, capture, surveillance, detention, and garrisoning” (2023, p. 7). For example, with economic development in mind, international funding agencies attempt to impose interventions onto independent nations (Connell, 2013), which also directly targets water law, management, policy, and development projects. According to Bosch and Gupta (2020), there is a growing trend in water governance towards increased involvement of the private sector. They argue that organisations like the World Bank and IMF pressure developing nations to commercialise or even privatise their water supplies. For example, in Belize, pressure from the World Bank and other donors largely contributed to the decision to privatise water services, but disputes with the water company, the Anglo-Dutch multinational CASCAL B.V., over tariff increases resulted in the government buying back the water company shares and thus renationalising water services (Mustafa and Reeder, 2009). Capitalising on natural resources is according to Roca-Servat et al. (2021) deeply engrained in colonialism, with Bieler and Moore (2023) referring to the tendency to monetise water as water grabbing.

Considering all this, what would decolonising water look like? Van Koppen and Schreiner (2018) argue that one way to decolonise water law is a hybrid approach that recognises living custom while also regulating high volume, formal water use of the few. Instead of a hybrid approach, Burdon et al. (2015) call for a multifaceted policy and framework, which requires an understanding of how current systems developed. Water resource allocations within a framework of post-colonial theory and a decolonisation approach criticise the perspectives on water resource allocations reproduced from imperial Europe and

attempt to construct alternative ways to allocate water that is socially more appropriate and just. Framing contemporary water allocation struggles within anticolonial theory scrutinises the legacy of colonialism, the continued influence of the power of coloniality, and the persistent forms of exploitation, while simultaneously searching for alternative constructions and interpretations of water allocations.

3. Case studies

European institutions were not imposed equally/identically across colonies, there were differences in how and how much colonial governance was institutionalised. For example, the British Crown's involvement in Mauritius was very different from their direct rule in India. Colonial and postcolonial experiences are thus far from universal. To gain some insight into the different experiences in terms of water-related reform, this section presents a typology of water decolonisation experiences in SIDS. For that purpose, we chose three countries that each embody a distinct type of experience with decolonising water resource allocations, ranging from no change in water resource allocations post-independence to *de facto* change after independence. The first case is Mauritius and represents the case of no change. Cabo Verde, our second case, represents *de jure* but absence of *de facto* change. Finally, the third case, Papua New Guinea, depicts *de jure* and *de facto* change in water resource allocations after independence. Together, these cases provide a range of distinct experiences with water resource decolonisation.

3.1. Business as usual: The case of Mauritius

Mauritius lies in the Indian Ocean, about 800 km off the east coast of Madagascar. With a small size of 2,000 square kilometres and a population of 1.26 million, it is one of the most densely populated countries in the world. Following successful economic diversification from an initially mono-crop, sugar-producing economy after having peacefully gained independence in 1968, Mauritius is now classified as an upper middle-income country (11,400 USD per capita) (World Bank, no date).

Originally uninhabited, Mauritius was colonised consecutively by the Dutch, the French, and the British. Whilst the Dutch introduced water-thirsty sugarcane first, it was the French who transformed Mauritius into a plantation economy, which then rose to the top sugar producer for Britain under British colonial rule. Importantly, the French settlers remained on the island since their arrival, retaining their control of sugar estates. Until today, sugar capital, i.e. sugar estates and business endeavours with roots in colonialism, dominate the economy and constitute an economic elite (Salverda, 2024).

3.1.1. The water situation

Although Mauritius benefits from rainfall that on average replenishes the country's water resources, it has started experiencing water stress. For one, Mauritius' topography is uneven, so that some regions are naturally more arid than others. At the same time, climate change contributes to shorter rainy and longer dry seasons and an overall reduced amount in annual rainfall. Furthermore, rising demand for water due to population growth and an increase in water-intensive economic activities like agriculture and tourism add to the pressure on the island's water resources (SADRI, 2021).

Historically, the colonisation project required more freshwater as from the 1850s due to the expansion of sugarcane into drier areas and the arrival of indentured labourers from India following the abolition of slavery, which led to a tripling of the population size in only 30 years (Lutz and Wils, 1990). As a reaction, to secure water for the sugar plantations, the Rivers and Canals Act, stipulated in 1863, granted riparian water rights to landowners with an adjacent stream (Government of Mauritius, 1863). Although section three of the law reads that "all rivers and streams are public property", sugar estates were now formally entitled to abstract water from adjoining rivers to irrigate their crops for free.

Following independence, water rights endured. The Ground Water Act of 1970 (Government of Mauritius, 1970) established groundwater as public property. The Central Water Authority Act (1971) established a national public water utility as a parastatal organisation acting under the tutelage of the Ministry of Energy and Public Utilities. Its responsibilities included the provision of drinking water services as well as the control, development, and conservation of both ground- and surface water resources. Without reiterating clearly, this law, through the definition of the utility's responsibility for water resources, implied that surface water belongs in the public domain. This was also confirmed by the highest court of appeal in 2022 (Judicial Committee of the Privy Council, 2022). The Water Resources Act 2024 stipulates clearly in section five that all water resources belong in the public domain; however, it clearly protects and even strengthens existing water rights deriving from the original 1863 law.

The strong protection of riparian water rights reflects the country's colonial legacy and importance of the economic elite (Peeroo and Bayliss, 2025). Fig. 1 represents all abstractions from freshwater resources in Mauritius, between 2010 and 2023. These abstractions can be divided into two categories of users: the public water utility and the group of water rights holders. Groundwater abstractions have remained stable over time, with the public utility being consistently responsible for 90%. In terms of volume abstracted, with 143 Mm³, this corresponds roughly to its abstraction of surface water in 2023. Water rights holders abstract only little groundwater. These abstractions require specific permissions and are not covered under the colonial law. However, water rights holders benefit from about two thirds of all surface water abstractions, although this amount has slightly decreased since 2010, both in volume and in share, whilst the public utility's abstractions have slightly increased. Overall water abstractions through water rights holders stand at 48% as of 2023, meaning that the water rights holders abstract about the same amount of water as the public utility.

3.1.2. Impact of postcolonial water resource allocations

This vast water use by water rights holders has a number of repercussions. For one, the high shares of river water abstracted can exacerbate the lack of availability for other water users. Water rights holders are usually entitled to abstract up to 90% of the average flow from rivers (Proag, 1995), although this is higher in some cases, such as one sugar estate abstracting 97%, with only 3% "left in the river for public needs" (World Bank, 2005, p. 154). From an environmental perspective, there are indications for over-exploitation of some of the rivers to which water rights have been granted (Proag, 1995). This pressure on surface water resources does not only have an environmental impact but also leads the government to engage in the costly construction of large-scale infrastructure, with additional reservoirs providing a supply-side solution to seasonal water scarcity (Peeroo, 2016).

The system of water rights also contributes to social inequalities. Water rights holders abstract this water for free. The water utility does not obtain any revenue from these water abstractions. This stands in contrast to two types of small landowners who do not benefit from free water. The first group obtains treated drinking water for the irrigation of their plots, at a tariff that is about 50% higher than that of drinking water delivered to domestic consumers. The second group of small landowners uses untreated freshwater but also pays, albeit a reduced tariff amounting to about 60% of that of water for domestic consumption. This lack of fairness in the treatment of small landowners has led them to abandon more than 25% of land previously used to cultivate (To, Seebaluck and Leach, 2018).

Another consequence relates to the water utility itself. The utility struggles financially to even cover operation and maintenance costs as non-revenue water amounts as of 2024 to 65%.³ Although nearly all

³ Mauritius National Assembly, Hansard 20/2024, pp. 54ff.

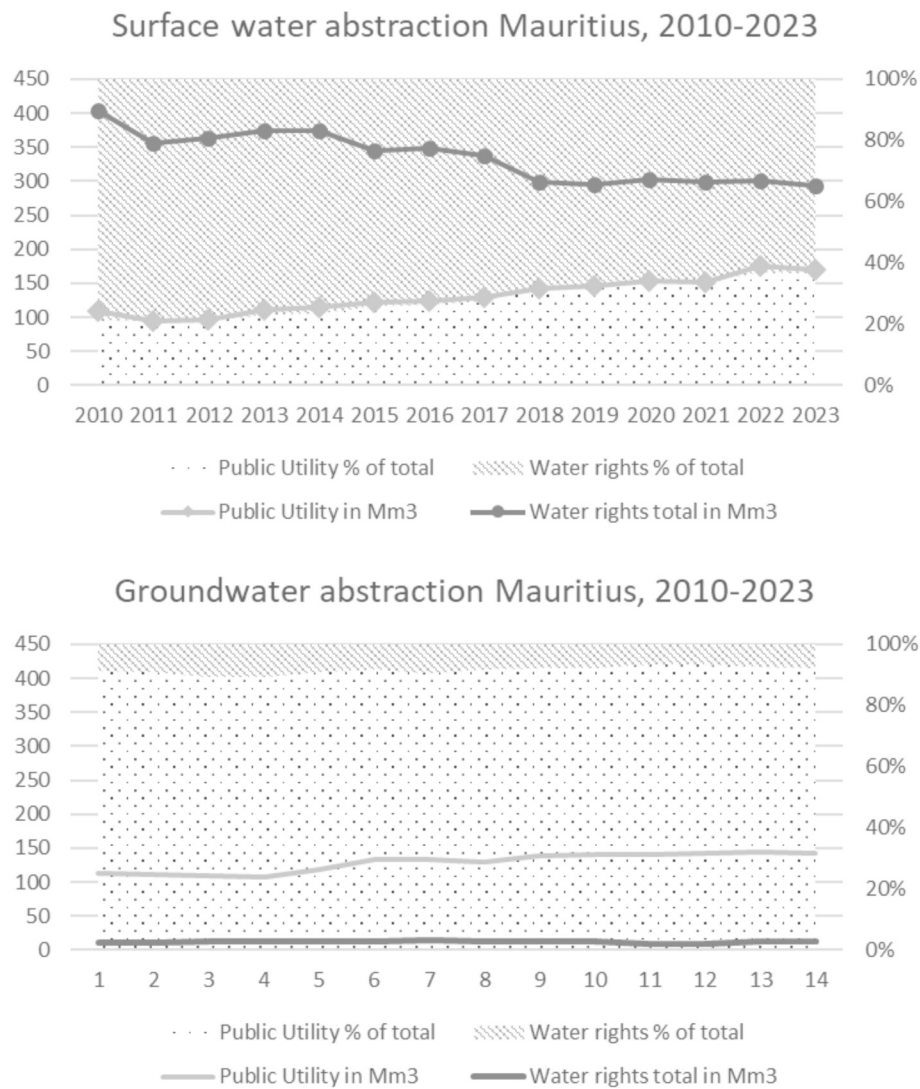


Fig. 1. Freshwater abstractions in Mauritius, 2010–2023. Source: authors' compilation based on Statistics Mauritius 2024, table 35.

households are connected to piped water, in many regions of the island the water only flows for a number of hours during the day and as a trickle due to insufficient pressure. Households take mitigating measures by installing and maintaining a water storage tank, with government subsidies for low-income households, and a pump to increase water flow pressure (Peeroo and Bayliss, 2025). The need for these mitigation measures is linked to the poor performance of the water utility which is starved of funds to improve its services. Households invest privately in improving these water services, whilst a small number of privileged water rights holders abstracts half of the country's water for free. All the while, smallholders pay even for untreated freshwater. Were water rights holders paying the same tariffs as these smallholders, the utility's revenues would double.⁴ This could then provide much needed funds to improve drinking water services and alleviate the financial burden on households.

Mauritius presents a case of failed decolonisation of water resource allocations. Although changes in legal frameworks following independence reaffirmed that water resources belong to the public domain, riparian water rights were left untouched, allowing the descendants of colonialists to retain control over surface water. Thus, postcolonial

water governance in Mauritius corresponds to continuity rather than transformation. The enduring water privilege for a certain group of landowners thus contradicts principles of equitable resource distribution in a decolonised economy. This case highlights the limits of decolonisation where economic power remains concentrated in the hands of a privileged group.

3.2. *De jure – But no de facto – change: The case of Cabo Verde*

Cabo Verde became independent from Portugal in 1975. The liberation movement was led by the African Party for the Independence of Guinea-Bissau and Cabo Verde (PAIGC) (Djassi Amado, 2020). Local support for the PAIGC, or any other liberation movement, was initially thin as the political police quickly repressed any social activism, but support increased among rural populations when the PAIGC voiced needs for agricultural reforms to support smallholders (Keese, 2017). Not long after independence, PAIGC members took up prominent governmental positions (ibid.). The new administration was dissatisfied with local officials, who appeared to uphold and continue to function according to colonial structures, resulting in the quick abolishment of these colonial functions but without a clear new institution in place, leading to chaos, malfunction, and lack of cooperation (ibid.). In 1991, the one-party regime fell to make space for elected municipalities (Keese and Urbano, 2023).

⁴ Authors' calculation based on Statistics Mauritius Digest Energy and Water 2023/24, table 41.

Cabo Verde consists of ten islands and 18 islets of which only 10% are classified as arable land (OECD, 2022). The population of approximately 550,000 lives across nine of the islands (ibid.). Tourism is the largest economic sector, constituting more than 20% of the total economy, while industries contribute less than 20% and agriculture about 10% (ibid.). In terms of ethnic groups, 71% of the population is Creole (Mulatto), 28% African, and 1% European (CIA, 2021).

3.2.1. The water situation

Cabo Verde faces several challenges with water allocation, including financial difficulties to provide water, scarcity of water, and institutional limitations in terms of functions and responsibilities (Varela, 2016). Water management thus must deal with several hurdles. As a result of the continuing influence of colonial laws on the management of springs, there is little spring water governance. According to Bosa (2015), farmers benefitting from spring water resist any attempt by the state to implement or promote new water management programmes. The state has been more successful with implementing water management changes for wells, which are largely controlled by communities or farmers' associations (ibid.).

The situation is different regarding drinking water. Cabo Verde has twelve operators responsible for drinking water supply, of which ELECTRA is the largest and considered the national utility (Marques et al., 2013). ELECTRA was established as a public water and electricity company in 1982 (ELECTRA, 2021). In the late 1990s, the government started a process of privatisation, selling 51% of ELECTRA to two Portuguese companies, but in 2008, these private companies left because the government blocked proposed tariff increases (Marques et al., 2013). In 2012, the government decided to restructure ELECTRA (ELECTRA, 2021), which, according to a World Bank project report, includes the intention to privatise ELECTRA again (Bah and Meyer, 2019).

Besides the role of local communities and farmers' associations in the management of well water, water users' associations are still uncommon (Bosa, 2015). For the development and implementation of water (and sanitation) projects, NGOs and farmers' associations do play active roles in all stages of the projects (ibid.). However, data on water allocation, use, and management in rural areas that rely on groundwater or surface water rather than piped water, is lacking.

Cabo Verde has very few permanent watercourses, which means farmland is either rainfed or irrigated with subterranean water from springs or wells (Bosa, 2015). Only 7% of arable land in Cabo Verde is irrigated, but it consumes around 50% of all managed water (although with considerable differences between islands and districts) (ibid.). This proportion is even higher according to Varela (2016), who states that the agricultural sector uses 71% of the total water supply. The distribution of these irrigated lands is highly unequal (Bosa, 2015). Physical access to drinking water is quite good in Cabo Verde, as Bosa (2015) writes that 93% of the households in cities are connected to water supply infrastructure and 74% of households in rural areas. A 2021 report by the Government of Cabo Verde describes a somewhat less positive picture, stating that 64% of the population lives in households with running water and highlighting the inequalities of water supply between poor and affluent areas and between urban and rural areas (Government of Cabo Verde, 2021). Having exact data on water connections is important in understanding water allocation inequalities, as individuals with access to running water use on average 50 L a day, while those without use only 15 (Varela, 2016).

Water in urban areas is mainly supplied via the public water network, while rural water supply depends on tanks or cisterns (Bosa, 2015). This water supply is mostly sourced from groundwater or industrially produced desalinated water (ibid.), although Varela (2016) writes that groundwater is the major water source, supplying 87% of consumed water, which is being exploited at 65% of its availability. As a result of water scarcity, the production of desalinated water is increasingly important. According to a government report, Cabo Verde is producing 43,720 m³ of desalinated water per day, which is expected to

increase as water demand, specifically in the tourism sector, is rising (Government of Cabo Verde, 2021). In Praia and Mindelo, Cabo Verde's main cities, desalinated water equals more than 80% of all drinking water (ibid.).

While most households have physical access to water, water tariffs in Cabo Verde are among the most expensive in the world due to water scarcity (Segurado et al., 2014). Data from IBNet Tariffs Database (2023) shows that the water tariff in Cabo Verde is USD 3.54/m³ for usage up to 15 m³. This means that for many of the poorest families in Cabo Verde, the percentage of their income that goes towards the payment of water is seven times higher than the OECD recommended 3% of their income and four times higher than the 5% of income set by Cabo Verde's National Strategic Water and Sanitation Plan (Varela, 2016). Water tariffs vary based on the amount of water consumed with a water use threshold above which the tariff increases to approach the average cost of water provision (Angel-Urdinola and Wodon, 2007). Varela (2016) argues that the tariffs for water for home consumption are sufficient to upkeep the water utilities, but that the financial problems of water providers are partly the result of irrigation water tariffs that are far below cost per cubic meter, despite 50–71% of water supply being used for irrigation. An evaluation report of Águas de Santiago, the main utility on the island of Santiago, shows that between 2018 and 2021, the company had been able to increase operating cost coverage from 74% to 97% while non-revenue water remains high at 64% (Mathematica, 2023), which is high compared to the non-revenue water of 33% across all of Cabo Verde's islands (see Table 1).

3.2.2. Impact of postcolonial water resource allocations

Water rights in Cabo Verde constitute a mix of customary water rights and institutionalised colonial water rights, posing a challenge to the authority of (local) government (Bosa, 2015). Traditionally, much of the land was cultivated via a sharecropping system, in which the landlords (mostly local mixed-race, or Créole, elite) had control over the water streams adjoining their lands (Keese, 2020). Colonial Portuguese water code considered water private property, and the colonial government constructed new irrigation infrastructure along with the introduction of laws to control the allocation of land for this new irrigation (Haagsma, 1995). However, these laws were never fully implemented, and landowners prepared much larger lands for irrigation (ibid.), resulting in inequality in access to water that persisted well into the 1970 s (Keese, 2020).

The independent Cabo Verde government wanted to break away from the perception of water as private property to make water accessible to small farmers and sharecroppers and thus the constitution today considers water the property of the state and "the common heritage of the people" (Bosa, 2015, p. 2641). However, the government still allowed individuals to drill private wells for irrigation and colonial water laws continue to have a considerable impact on current water laws (ibid.). For example, landowners with a water spring consider that water their private property. They control the management of the spring as well as the distribution of the water through informal arrangements with farmers cultivating the land, a practice in line with the colonial system (ibid.). Furthermore, while commercialisation and privatisation are generally considered Western impositions, Cabo Verde recently started to encourage private initiatives (ibid.). Finally, a public-private water supply model is gaining ground across the islands (four islands in 2016) (Varela, 2016).

Thus, the newly independent government desired a clear break from colonial (water) law, but the lack of clear and immediate change resulted in the continuation of practices rooted in colonial law. While traditional practices and formal rights and laws co-exist, the recent governments are again moving towards privatisation of water and water institutions.

3.3. *De facto change: The case of Papua New Guinea*

Papua New Guinea followed English Common Law during occupation, which included riparian water use rights (Kalinoe, 1998b). However, many Papua New Guineans did not accept the colonial legislation and preferred to adhere to custom, which was not formally recognised by colonial Australia persists today (Weisbrot, 1981). However, when Papua New Guinea's independent constitution was drafted, members of the indigenous Constitutional Planning Committee pushed for the recognition of customary law (ibid.). Consequently, upon independence from Australia in 1975, English common law was adopted into the constitution but would not apply if inconsistent with custom (Kalinoe, 1998a). English common law, whilst not abandoned altogether, thus became subordinate to custom (Weisbrot, 1981; Minei and Kaipu, 2022). Recognising the dynamic nature of customary law, the legal system is continuously developed and, even though a slow process, customary law is increasingly incorporated into the constitution of Papua New Guinea (Minei and Kaipu, 2022).

3.3.1. *The water situation*

Ingutia (2024) identified Papua New Guinea as one of 23 critically water insecure countries, with 30% of the population relying on untreated surface water rather than improved water sources. Atoll regions are vulnerable to saltwater intrusion by rising sea levels, affecting water quality for drinking and agricultural purposes (Bourke, 2018; Dora Kuir-Ayius, 2024).

Papua New Guinea's development strategic plan (Department of National Planning and Monitoring, 2010) states that only 30% of the total population has access to an improved water source, and only 9% of the population has access to piped drinking water. There are two companies responsible for delivering piped drinking water: Eda Ranu, which supplies the city of Port Moresby, and Water PNG, which supplies all other urban areas. Both water utility companies are state-owned and are currently in the process of merging (Kumul Consolidated Holdings, no date). Papua New Guinea's target for 2030 is that 70% of the population has access to an improved water source, which the government hopes to achieve through public-private partnerships.

However, significantly increasing access to piped water seems almost impossible, as neither Water PNG nor Eda Ranu establish new water connections on land that is not formally owned (Dutton and Pigolo, 2014; Rooney, 2021). This is extremely significant, because Papua New Guinea Indigenous leaders fought to maintain the preferred customary system of land rights, which became part of the independent constitution, with the result that formal land titles rarely exist (Rooney, 2021). While land reform has imposed some partially implemented systems of individual land titling and tenure (Yapao et al., 2012), most land is still held customarily, and thus cannot receive any new water connections, which leads according to Rooney (2021) to inequalities along social, economic, and political lines.

Of the piped drinking water connections, many are communal or public water connections, for which users pay their local water committee, which then pays the utility company (Rooney, 2021). This is not always a smooth experience, as it requires waterstand caretakers to monitor water usage and enforce payments (ibid.). There is considerable mistrust within the community regarding the water committee's honesty in handling the finances (Dutton and Pigolo, 2014). Failure to pay the bill means the pipe is disconnected and an entire community loses access to drinking water until payment is made (Rooney, 2021). Fees not only cover water use but also the installation of additional pipes (ibid.). In a World Bank report prepared by Dutton and Pigolo (2014), it is argued that water tariffs are highly unequal based on consumption, especially when comparing formal urban settlements where households have private connections with informal settlements.

In a 2003 report, Kaman points out some issues with Papua New Guinea's implementation of water tariffs in a push towards more

privatisation of water utilities, including that not all users pay for water, that landowners are denied access to water adjacent/underneath their land, and that problems with accurate recording of water use result in overcharging and people being cut-off from water if they fail to pay. Kaman (2003) therefore recommends halting any efforts towards privatisation and to explore alternative ways to raise required funds to improve water services.

Lack of political support and communities' resistance to paying for water are two considerable barriers to the development of piped drinking water networks according to the utility company (Rooney, 2021). According to the utility company (Water PNG, no date), the government has been steadily decreasing subsidies to the water sector, which means that consumers are required to pay for the cost of water utility services. The utility company has a requirement to make a profit, which according to Rooney (2021) conflicts with its duty of equitable water provision.

3.3.2. *Impact of postcolonial water resource allocations*

Water rights over rivers, lakes, and streams in Papua New Guinea are recognised based on a combination of clearly defined laws and undefined customary rights (Kalinoe, 1998b). Two laws introduced shortly after independence address water rights: the Customs Recognition Act and the Water Resources Act, 1982 (ibid.). The Customs Recognition Act recognises customary ownership of land and customary water rights, while the Water Resources Act acknowledges 'customary rights to the use of water' and outlines compensation rules for customary riparian landowners who face hindrance, damage, or deprivation of their land or associated water due to other water users (ibid.). Under the Customs Recognition Act, such compensation claims can be pursued in court (ibid.). While individuals or communities can hold rights to the use of water, the ownership of water lies with the state under the Water Resources Act. The state thus bears the rights and responsibilities over the use and control of water flow, both of surface water and groundwater (Von Custodio and Lincklaen Arriens, 2005).

Water policy in Papua New Guinea includes communities in decision-making and management. For example, Papua New Guinea's development strategic plan states that "Public investments to increase access to safe drinking water, sanitation and postal services in smaller communities will be made in partnership with communities, the private sector, churches, NGOs and aid donors" (Department of National Planning and Monitoring, 2010, p. 74). Water committees are instrumental in the interaction between the state and local populations, with community leaders and water company officials meeting regularly to discuss water projects and invoice payments (Rooney, 2021). Furthermore, village courts were introduced just before independence to allow customary law to play an important role in conflict resolution (Weisbrot, 1981). Thus, the active involvement of communities in development, decision-making, and management of water allocation is directly related to the recognition and implementation of customary law.

At the same time, riparian rights formalised during colonial rule remain enforceable in post-colonial Papua New Guinea (Kalinoe, 1998b). Although some conditions have been incorporated into the constitution, for example, riparian rights cover the use of water for domestic purposes and for livestock free of charge but any other purpose or any other (non-riparian) user must first obtain a permit (ibid.), the riparian rights are linked to landownership, neither of which have been reformed. As such, unequal access to water has become institutionalised through colonialism, when the riparian rights were formalised, and is reproduced over time.

There remain levels of friction between customary laws and formal administration. For example, in 2000, a World Bank project to improve land administration led to a protest in which several activists, who saw the project as another attempt at registering customary land rights, were fatally shot (Rooney, 2021). These frictions exist alongside an increased practice to blend customary land tenure systems with Western systems,

driven by social changes such as urbanisation, migration, and the increasing value of land (*ibid.*).

4. Discussion

From these three case studies emerge certain commonalities and differences. The first commonality lies in the environmental and social challenges arising from the impact of climate change, economic development and urbanisation on water resources. All three cases illustrate the ensuing difficulties and struggles to reflect these developments in water governance. In each of these cases, this difficulty is also linked to the path dependency regarding the country's colonial legacy, whereby their colonial past continues to shape access to and control over water resources. As such, historical legislation and relics of governance frameworks as well as colonial infrastructure still influence the allocation of water resources. Yet, because each country's context is unique, the results of this path dependence differ. Whilst in Mauritius, dominant colonial-era privileges have been protected and strengthened, Papua New Guinea's water allocations are far more contested, with customary allocations prevailing in rural areas where indigenous customary water rights may override formalised legal rights.

This points to an important factor: Mauritius was uninhabited prior to the arrival of colonisers whilst Papua New Guinea had an Indigenous population. This does not imply that Mauritius does not have to grapple with mediating water allocations amongst different users, however, SIDS like Mauritius and Cabo Verde do not experience contestations from Indigenous groups like Papua New Guinea does. This lack of Indigenous claims to water might facilitate postcolonial water resource allocations. Interestingly, in both Mauritius' and Cabo Verde's cases water is allocated to powerful private actors, to the expense of local communities. In Mauritius, it is the colonial-era water elite whilst in Cabo Verde the commodification of water through the introduction of water markets has created a new role for private water firms in the provision of drinking water. It would then appear that the lack of contestation from Indigenous actors smooths the path for allocating water according to economic imperatives.

However, it is also necessary to consider the relative abundance of water resources. Papua New Guinea does not lack freshwater whilst the other two cases experience water stress. This suggests that under water abundance, it is easier to navigate complex and contested claims to water from various groups. Where water is less readily abundant, power relations will more clearly determine water allocations. Consequently, both the cases of Mauritius and Cabo Verde are a testament to the dominance of powerful private sector interests.

So, which of the two explanations– the existence of an Indigenous population successfully claiming its share of water resources or the abundance of water – is more convincing as to why Papua New Guinea's postcolonial water allocations seem less exclusive to one specific group? Whilst an optimistic view would express support for the former, Indigenous voices claiming their share, the experience of dispossessed Indigenous populations in other regions of the world unfortunately cautions this view (for experiences from Australia and the USA for instance see [Hartwig et al. \(2022\)](#); [Underhill, Sabati and Beckett \(2025\)](#)). This would imply that it might be easier for marginalised voices to be heard where water resources are abundant.

However, a close reading of the case of Papua New Guinea denies any suggestion of the country having achieved equity in postcolonial water allocations. Notwithstanding customary rights prevailing in rural areas, overall, water provision is still biased towards urban areas where population density increases the contestation over the resource and makes it available through improved infrastructure. Therefore, all three cases expose the difficulties in allocating water resources justly, with specific groups being favoured over others.

Overall, the case studies substantiate the importance of the historical context of SIDS in explaining their experience with present-day water resource allocations. Despite their commonalities, SIDS differ in their

colonial trajectories, each having their own specific context which matters in explaining the overall outcome in decolonising water. Water resource availability then appears as an additional constraint, with abundance of water resources allowing for more successful inclusion of otherwise marginalised groups. The case studies are summarised in [Table 2](#).

5. Conclusion

This paper has examined the largely unexplored role of colonial legacies in shaping contemporary water resource allocations in SIDS and developed a typology of their experiences with decolonising water. The three cases highlight how colonial legacies continue to shape water governance today, though with varied outcomes. In Mauritius, despite legal reforms, the colonially inherited status quo persists, with water rights still heavily biased towards sugar estates rooted in the colonial era. In Cabo Verde, reforms have commodified water through the introduction of water markets, thereby benefitting a new group of private actors. By contrast, Papua New Guinea appears more successful in decolonising water: in rural areas, customary rights take precedence over more formalised rights, although urban water allocations remain contested.

These results have several implications. For SIDS in particular, decolonisation is a difficult process. As seen in Cabo Verde, severe fiscal constraints and the resulting struggle to finance water infrastructure often force them to turn to international financial institutions. These however typically promote the commodification and privatisation of water services ([Bieler and Jordan, 2018](#)). Such processes are well documented to marginalise local communities, as private corporations frequently fail to extend their services to poorer or rural areas ([Hall and Lobina, 2007](#)). Decolonising water in SIDS would therefore also require resisting neoliberal approaches to water resource governance. This task however demands the capacity to withstand pressure from powerful international actors.

Our case studies also show that decolonisation of water is highly context-specific, with no single approach applicable everywhere. This is an important finding that extends beyond SIDS, calling for critical assessment of one-size-fits-all approaches to water governance. For example, the Integrated Water Resources Management framework, embedded in the [UN's Sustainable Development Goals](#) and promoted by other international institutions, risks overlooking power dynamics and thereby excluding marginalised communities ([Popovici et al., 2021](#)).

We hope that our study will encourage further research into the decolonisation of water in SIDS. Having identified several factors that shape decolonisation of water, such as the existence of an Indigenous population prior to colonisation and the relative abundance of water resources, more studies are needed to clarify how each influences a country's postcolonial trajectory. Furthermore, the smallness of SIDS and the therefrom resulting dependence on external actors and finance calls for closer examination of how global financial institutions and aid agencies shape water governance in postcolonial contexts.

Ethical considerations

No ethical approval was sought for this research as all research relies on secondary data.

Consent to participate

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Consent for publication
Not applicable.

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Table 2

Summary of experiences with decolonising water resource allocation in three SIDS. Source: the authors.

Aspect	Mauritius	Cabo Verde	Papua New Guinea
Colonial influence	French & British legal traditions shape water rights; maintenance of colonial economic elite	Portuguese rule emphasised centralised control, facilitating introduction of new private actors after independence	Australian colonial rule formalised water allocations, but indigenous customary water rights remain strong
Water availability	On average sufficient rainfall, but with seasonal variabilities; surface water heavily exploited	Semi-arid climate; high reliance on desalination and water imports	Abundant freshwater; infrastructure limitations hinder access
Water rights	Riparian rights benefit elite sugar estates, reinforcing inequalities	Commodification, marketisation, and privatisation of water provision	Strong customary water rights coexisting with formal water rights
Access to water services	Universal access to piped water, but private mitigation strategies to offset poor service quality	High urban but limited rural access	Large disparities between urban and rural areas, resulting in reliance on traditional water sources
Experience with decolonising water	Incremental policy changes protecting and reinforcing status-quo	Shift in control over water from colonial to postcolonial (private) actors	Customary water rights often override water policy, creating legal complexity

CRedit authorship contribution statement

Lianne Oosterbaan: Writing – review & editing, Writing – original draft, Validation, Investigation, Data curation, Conceptualization.
Aleksandra Peeroo: Writing – review & editing, Writing – original draft, Visualization, Validation, Methodology, Investigation, Formal analysis, Data curation, Conceptualization.

Data availability

Data will be made available on request.

References

- Allouche, J., 2016. The birth and spread of IWRM - a case study of global policy diffusion and translation. *Water Altern.* 9 (3), 412–433.
- Angel-Urdinola, D., Wodon, Q., 2007. Do utility subsidies reach the poor? Framework and evidence for Cape Verde, Sao Tome, and Rwanda. *Econ. Bull.* 9 (4), 1–7.
- Bah, T., Meyer, M., 2019. *Cabo Verde: Renewable Energy Development Project (P170236), Project Information Document (PID)*. Available at: <https://doi.org/10.1136/bmj.318.7187.822>.
- Bieler, A., Jordan, J., 2018. 'Commodification and "the commons": The politics of privatising public water in Greece and Portugal during the Eurozone crisis', *European Journal of International Relations*, 24(4), pp. 934–957. Available at: <https://doi.org/10.1177/1354066117728383>.
- Bieler, A., Moore, M., 2023. 'Water Grabbing, Capitalist Accumulation and Resistance: Conceptualising the Multiple Dimensions of Class Struggle', *Global Labour Journal*, 14(1), pp. 2–20. Available at: <https://doi.org/10.15173/glj.v14i1.5074>.
- Bishop, M.L., Bouhia, R., Carter, G., Corbett, J., Lindsay, C., Scobie, M., Wilkinson, E., 2025. *Earth system Governance sustaining Development in small islands Earth System Governance*. Available at: <https://doi.org/10.1017/9781009389174>.
- Bosa, M.S., 2015. 'Water institutions and management in Cape Verde', *Water*, 7, pp. 2641–2655. Available at: <https://doi.org/10.3390/W7062641>.
- Bosch, H.J., Gupta, J., 2020. Access to and ownership of water in Anglophone Africa and a case study in South Africa. *Water Altern.* 13 (2), 205–224.
- Bourke, R.M. (2018) 'Impact of climate change on agriculture in Papua New Guinea', in A.R. Quartermain (ed.) *Climate Change: Our Environment, Livelihoods and Sustainability*. University of Goroka, Papua New Guinea, pp. 35–50.
- Branchoux, C., Fang, L. and Tateno, Y., 2018. 'Estimating Infrastructure Financing Needs in the Asia-Pacific Least Developed Countries, Landlocked Developing Countries, and Small Island Developing States', *Economies*, 6(3), pp. 1–21. Available at: <https://doi.org/10.3390/ECONOMIES6030043>.
- Burdon, P. et al., 2015. 'Decolonising Indigenous water "rights" in Australia: flow, difference, and the limits of law', *Settler Colonial Studies*, 5(4), pp. 334–349. Available at: <https://doi.org/10.1080/2201473X.2014.1000907>.
- Calori, A., Spaskovska, L., 2021. Reimagining the World: Decolonisation and the Promise of Development. *Contemporary European History*, 30(4), pp. 613–620. Available at: <https://doi.org/10.1017/S0960777321000539>.
- Cashman, A., 2014. 'Water security and services in the Caribbean', *Water*, 6, pp. 1187–1203. Available at: <https://doi.org/10.3390/w6051187>.
- Connell, J., 2013. *Islands at risk?: Environments, Economies and Contemporary Change*. Edward Elgar Publishing, Cheltenham.
- CIA, 2021. *Population - 2021 World Factbook Archive*. Available at: <https://www.cia.gov/the-world-factbook/about/archives/2021/countries/cabo-verde/#people-and-society> (Accessed: 22 May 2024).
- Ciampittello, M., Marchetto, A., Boggero, A., 2024. 'Water Resources Management under Climate Change: A Review', *Sustainability (Switzerland)*, 16(9), p. 3590. Available at: <https://doi.org/10.3390/SU16093590>.
- Claire, T., Surprise, K., 2022. 'Moving the Rain: Settler Colonialism, the Capitalist State, and the Hydrologic Rift in California's Central Valley', *Antipode*, 54(1), pp. 153–173. Available at: <https://doi.org/10.1111/ANTI.12777>.
- Closas, A., Villholth, K.G., 2020. 'Groundwater governance: Addressing core concepts and challenges', *Wiley Interdisciplinary Reviews: Water*, 7(1), p. e1392. Available at: <https://doi.org/10.1002/WAT2.1392>.
- Coissoro, N., 1984. 'African Customary Law in the Former Portuguese Territories, 1954–1974', *Journal of African Law*, 28(1–2), pp. 72–79. Available at: <https://doi.org/10.1017/S0021855300005258>.
- Cosgrove, C.E., Cosgrove, W.J., 2012. The Dynamics of Global Water Futures: Driving Forces 2011–2050. Paris.
- Curley, A., 2019. "'Our Winters' Rights": Challenging Colonial Water Laws', *Global Environmental Politics*, 19(3), pp. 57–76. Available at: https://doi.org/10.1162/glep_a.00515.
- Von Custodio, D., Lincklaen Arriens, W., 2005. 'Understanding Water Rights and Water Allocation. In 1st NARBO Thematic Workshop on Water Rights and Water Allocation. Hanoi, Viet Nam.
- Department of National Planning and Monitoring, 2010. *Papua New Guinea development strategic plan 2010–2030*.
- Djassi Amado, A., 2020. Whose Independence? Cabo Verdean-Americans and the politics of National Independence of Cabo Verde (1972–1976). *Journal of Cape Verdean Studies* 5 (1), 36–53.
- Kuir-Ayius, D., 2024. Impact of climate Change and Accessing Services in Papua New Guinea. In: Jolly, S., Ahmad, N., Scot, M. (Eds.), *Climate-Related Human Mobility in Asia and the Pacific*. Springer, pp. 183–198.
- Dutton, P., Pigolo, G., 2014. *Papua New Guinea: Sanitation, Water Supply and Hygiene in Urban Informal Settlements*.
- ELECTRA, 2021. *História*. Available at: <https://www.electra.cv/> (Accessed: 11 April 2024).
- Falkland, T., 1999. 'Water resources issues of small island developing states', *Natural Resources Forum*, 23(3), pp. 245–260. Available at: <https://doi.org/10.1111/j.1477-8947.1999.tb00913.x>.
- Fanon, F., 1961. *The Wretched of the Earth*, 2001st edn. Penguin Books, London.
- Figueroa Helland, L.E. and Lindgren, T., 2016. 'What Goes Around Comes Around: From the Coloniality of Power to the Crisis of Civilization', *Journal of World-Systems Research*, 22(2), pp. 430–462. Available at: <https://doi.org/10.5195/jwsr.2016.631>.
- Garrick, D. et al., 2019. 'Rural water for thirsty cities: a systematic review of water reallocation from rural to urban regions', *Environmental Research Letters*, 14(4), p. 043003. Available at: <https://doi.org/10.1088/1748-9326/AB0DB7>.
- Germond-Duret, C., 2022. *Decolonising Conservation: Towards a Postcolonial Conservation Regime* Written by Celine Germond-Duret. Available at: <https://www.e-ir.info/2022/06/07/decolonising-conservation-towards-a-postcolonial-conservation-regime/> (Accessed: 2 November 2023).
- Getachew, A., Mantena, K., 2021. 'Anticolonialism and the Decolonization of Political Theory', *Critical Times*, 4(3), pp. 359–388. Available at: <https://doi.org/10.1215/26410478-9355193>.
- Gibbs, L.M., 2009. 'Just Add Water: Colonisation, Water Governance, and the Australian Inland', *Environment and Planning A*, 41(12), pp. 2964–2983. Available at: <https://doi.org/10.1068/A41214>.
- Gohar, A. et al., 2019. 'Managing food and water security in Small Island States: New evidence from economic modelling of climate stressed groundwater resources', *Journal of Hydrology*, 569, pp. 239–251. Available at: <https://doi.org/10.1016/j.jhydrol.2018.12.008>.
- Government of Cabo Verde, 2021. *Cabo Verde: 2020 Update to the first Nationally Determined Contribution (NDC)*. Praia. Available at: <https://doi.org/10.30875/c19ef7aa-en>.
- Government of Mauritius, 1863. *Rivers and Canals Act*. Available at: <https://cwa.govmu.org/cwa/wp-content/uploads/2022/07/RIVERS-AND-CANALS-ACT-Cap-421.pdf> (Accessed: 25 March 2025).
- Government of Mauritius, 1970. *Ground Water Act*. Available at: <https://publicutilities.govmu.org/Documents/2020/Legislation/Water/Central%20Water%20Authority/Groundwater/groundwater31.pdf?csf=1&e=N3hokx> (Accessed: 25 February 2025).
- Government of Mauritius, 1971. *The Central Water Authority Act*. Available at: [https://publicutilities.govmu.org/Documents/2020/Legislation/Water/Centralwaterauthorityact19711.pdf?csf=1&e=7OZ0U6#:~:text=The%20Authority%20shall%20be%20responsible,and%20conservation%20of%20water%20resources.&text=\(1\)%20Subject%20to%20subsection%20\(,property%2C%20or%20make%20any%20donation.](https://publicutilities.govmu.org/Documents/2020/Legislation/Water/Centralwaterauthorityact19711.pdf?csf=1&e=7OZ0U6#:~:text=The%20Authority%20shall%20be%20responsible,and%20conservation%20of%20water%20resources.&text=(1)%20Subject%20to%20subsection%20(,property%2C%20or%20make%20any%20donation.) (Accessed: 25 February 2025).

- Government of Mauritius, 2024. *The Water Resources Act*. Available at: <https://mauritiusassembly.govmu.org/mauritiusassembly/wp-content/uploads/2024/07/act0924.pdf> (Accessed: 25 March 2025).
- Goyal, Y., 2023. 'Anticolonialism as Theory', *Representations*, 162(1), pp. 1–10. Available at: <https://doi.org/10.1525/rep.2023.162.1.1>.
- Grau, J., Rihm, A., 2013. *Water and Sanitation in Belize*. Inter-American Development Bank: Technical Note.
- Gude, V.G., 2021. 'One water – evolving roles of our precious resource and critical challenges', *AQUA - Water Infrastructure, Ecosystems and Society*, 70(4), pp. 467–482. Available at: <https://doi.org/10.2166/AQUA.2021.154>.
- Haagsma, B., 1995. 'Traditional water management and state intervention: the case of Santo Antao, Cape Verde', *Mountain Research & Development*, 15(1), pp. 39–56. Available at: <https://doi.org/10.2307/3673699>.
- Hall, D., Lobina, E., 2007. 'Profitability and the poor: Corporate strategies, innovation and sustainability', *Geoforum*, 38(5), pp. 772–785. Available at: <https://doi.org/10.1016/j.geoforum.2006.08.012>.
- Hartwig, L.D. et al., 2022. 'Water colonialism and Indigenous water justice in south-eastern Australia', *International Journal of Water Resources Development*, 38(1), pp. 30–63. Available at: <https://doi.org/10.1080/07900627.2020.1868980>.
- Holding, S. et al., 2016. 'Groundwater vulnerability on small islands', *Nature Climate Change* 2016 6:12, 6(12), pp. 1100–1103. Available at: <https://doi.org/10.1038/nclimate3128>.
- Hommes, L. et al., 2019. 'Rural–urban water struggles: urbanizing hydrosocial territories and evolving connections, discourses and identities', *Water International*. Routledge, pp. 81–94. Available at: <https://doi.org/10.1080/02508060.2019.1583311>.
- IBNet Tariffs Database (2023). Available at: <https://tariffs.ib-net.org/sites/IBNET/ViewTariff?tariffid=26874&countryId=5> (Accessed: 8 April 2024).
- Ingutia, R., 2024. 'Who is being left behind in water security, where do they live, and why are they left behind towards the achievement of the 2030 agenda?', *Sustainable Water Resources Management*, 10(5), pp. 1–21. Available at: <https://doi.org/10.1007/S40899-024-01140-0/FIGURES/6>.
- Jackson, S.E., Palmer, L.R., 2012. Modernising water: Articulating custom in water governance in Australia and East Timor. *International Indigenous Policy Journal* 3 (3), 1–25. <https://doi.org/10.18584/iiipj.2012.3.3.7>.
- Janki, M., 2010. *Customary Water Laws and Practices: Guyana*, FAO. Available at: https://www.fao.org/fileadmin/templates/legal/docs/CaseStudy_Guyana.pdf (Accessed: 26 May 2023).
- Jiménez, A. et al., 2020. 'Unpacking Water Governance: A Framework for Practitioners', *Water* 2020, Vol. 12, Page 827, 12(3), p. 827. Available at: <https://doi.org/10.3390/W12030827>.
- Judicial Committee of the Privy Council, 2022. *Ciel Ltd and another (Appellants) v Central Water Authority (Respondent) (Mauritius)*. Available at: <https://www.jcpc.uk/cases/jcpc-2019-0042> (Accessed: 25 March 2025).
- Kalinoe, L., 1998a. The common law riparian rights doctrine and its applicability In Papua New Guinea. *Melanesian Law Journal* 2, 1–20.
- Kalinoe, L., 1998b. *Water law and the nature of customary water rights in*. University of Wollongong, Papua New Guinea.
- Kaman, J., 2003. *Papua New Guinea Privatisation of Water: "Eda Ranu"*. Commonwealth Foundation.
- Keese, A., 2017. 'Decolonisation, Improvised: A Social History of the Transfer of Power in Cabo Verde, 1974–1976', *Portuguese Studies Review*, 25(1), pp. 291–312.
- Keese, A., 2020. 'Imagining a Better Future: Anti-colonial Protest and Social Debates in Santo Antão, Cabo Verde, 1945–1975', *Itinerario*, 44(1), pp. 80–104. Available at: <https://doi.org/10.1017/S0165115320000066>.
- Keese, A., Urbano, A., 2023. 'Researching post-independence Africa in regional archives: Possibilities and limits in Benin, Cabo Verde, Ghana and Congo-Brazzaville', *Africa*, 93(4), pp. 542–561. Available at: <https://doi.org/10.1017/S0001972023000621>.
- Van Koppen, B. and Schreiner, B., 2018. *A hybrid approach to decolonize formal water law in Africa, IWMI Research Report*. Colombo, Sri Lanka. Available at: <https://doi.org/10.5337/2018.219>.
- Kumul Consolidated Holdings (no date) *Water PNG*. Available at: <https://www.kch.com.pg/our-portfolio/water-png-limited/> (Accessed: 15 May 2024).
- Lathashri, U.A., Mahesha, A., 2016. 'Groundwater sustainability assessment in coastal aquifers', *Journal of Earth System Science*, 125(6), pp. 1103–1118. Available at: <https://doi.org/10.1007/S12040-016-0719-5/METRICS>.
- Liemberger, R., Wyatt, A., 2018. *Quantifying the Global Non-Revenue Water Problem*. Available at: <https://doi.org/10.2166/ws.2018.129>.
- Liemberger, R., Wyatt, A., 2019. 'Quantifying the global non-revenue water problem', *Water Supply*, 19(3), pp. 831–837. Available at: <https://doi.org/10.2166/WS.2018.129>.
- Lutz, W., Wils, A.B., 1990. *The demographic discontinuities of Mauritius*. IIASA Working Paper. WP-90-035. Available at: <https://pure.iiasa.ac.at/id/eprint/3418/> (Accessed: 8 April 2025).
- Marcatelli, M., Büscher, B., 2019. Liquid violence: the politics of water responsabilisation and dispossession in South Africa. *Water Altern.* 12 (2), 760–773.
- Marques, R.C., Simões, P. and Berg, S., 2013. Water sector regulation in small island developing states: an application to Cape Verde. *Water Policy*, 15(1), pp. 153–169. Available at: <https://doi.org/10.2166/wp.2012.057>.
- Marshall, G.R., Alexandra, J., 2016. *Institutional Path Dependence and Environmental Water Recovery in Australia's Murray-Darling Basin*. *Water Altern.* 9 (3), 679–703.
- Mathematica, 2023. *Extending Piped Water and Sewer Coverage in Cabo Verde*. Available at: <https://mcc.icpsr>. (Accessed: 10 October 2024).
- Thame, M., 2014. *Disciplining the nation: considering the privileging of order over freedom in postcolonial Jamaica and Barbados*. *Social and Economic Studies* 63 (2), 1–29.
- McKibbin, C., 2023. Decolonizing Canadian Water Policy: Lessons from Indigenous Case Studies. Available at: UCL Open: Environment 5, 1–14 <https://doi.org/10.14324/111.444/000127.v3>.
- Minel, A.P., Kaipu, S.O., 2022. 'Indigenous Customary Law in Context', *US-China Law Review*, 19(1), pp. 1–23. Available at: <https://doi.org/10.17265/1548-6605/2022.01.001>.
- Molle, F., 2009. River-basin planning and management: The social life of a concept. *Geoforum*, 40(3), pp.484–494. Available at: <https://doi.org/10.1016/j.geoforum.2009.03.004>.
- Mustafa, D., 2022a. *Decolonised water: lessons from Pakistan*. Available at: <https://decolonisegeography.com/blog/2022/10/decolonised-water-lessons-from-pakistan/> (Accessed: 1 June 2023).
- Mustafa, D., 2022b. *Decolonising water*. Available at: <https://decolonisegeography.com/blog/2022/09/decolonising-water/> (Accessed: 1 June 2023).
- Mustafa, D., Reeder, P., 2009. "People is all that is left to privatize": Water supply privatization, globalization and social justice in Belize City, Belize', *International Journal of Urban and Regional Research*, 33(3), pp. 789–808. Available at: <https://doi.org/10.1111/j.1468-2427.2009.00849.x>.
- Ndlovu-Gatshehi, S.J., 2013. *Coloniality of Power in Postcolonial Africa – Myths of Decolonization*. CODESRIA Books Publication System.
- O'Donnell, E., 2023 'Water sovereignty for Indigenous Peoples: Pathways to pluralist, legitimate and sustainable water laws in settler colonial states', *PLOS Water*, 2(11), p. e000144. Available at: <https://doi.org/10.1371/JOURNAL.PWAT.000144>.
- Oecd, 2022. *Sustainable Ocean for All Series Sustainable Ocean Economy Country Diagnostics of Cabo Verde*. OECD Publishing, Paris.
- Pagayona, E.N., Honra, J., 2024. Developing an Optimal Model for Water distribution System Design. *Power System Technology* 48 (1), 1233–1257. <https://doi.org/10.52783/PST.386>.
- Paiva, A.C. da E. et al., 2020. 'Urban expansion and its impact on water security: The case of the Paraíba do Sul River Basin, São Paulo, Brazil', *Science of The Total Environment*, 720, p. 137509. Available at: <https://doi.org/10.1016/J.SCITOTENV.2020.137509>.
- Peeroo, A., 2016. 'The Institutional Setting of Mauritian Water Sector Governance: What Place for Sustainability?', in A. Peeroo and R. Sultan (eds) *Governance and Economic Accounting Issues in the Mauritian Water Sector: Towards Sustainable Management of a Natural Resource*. Washington, DC and others: Global Development Network (GDN), pp. 68–90.
- Peeroo, A., Bayliss, K., 2025. A Political Economy Perspective on Mauritian Water Services. In: Oya, C., Ramtohol, R., Tandrayen-Ragoobur, V. (Eds.), *The Oxford Handbook of the Mauritian Economy*. Oxford University Press (OUP).
- Popovici, R. et al., 2021. 'Outsourcing governance in Peru's integrated water resources management', *Land Use Policy*, 101, p. 105105. Available at: <https://doi.org/10.1016/J.LANDUSEPOL.2020.105105>.
- Proag, V., 1995. *The Geology and Water Resources of Mauritius*. Mahatma Gandhi Institute, Moka.
- Pyndiah, G., 2016. Decolonizing Creole on the Mauritius islands: Creative practices in Mauritian Creole. *Island Studies Journal* 11 (2), 485–504. <https://doi.org/10.2404/3/isj.363>.
- Quijano, A., 2000. 'Coloniality of Power, Eurocentrism, and Latin America', *Nepantla: Views from South*, 1(3), pp. 533–580.
- RiverOfLife, M., Taylor, K.S., Poelina, A., 2021. 'Living Waters, Law First: Nyikina and Mangala water governance in the Kimberley, Western Australia', *Australasian Journal of Water Resources*, 25(1), pp. 40–56. Available at: <https://doi.org/10.1080/13241583.2021.1880538>.
- Roca-Servat, D., Arias-Henao, J.D., Botero-Mesa, M., 2021. 'Decolonizing hegemonic approaches of water: exploring Latin American proposals for communality and community entanglements', *Ambiente e Sociedade*, 24, pp. 1–20. Available at: <https://doi.org/10.1590/1809-4422asoc20200961vu2021L4TD>.
- Rodd, A., 2016. 'Adapting postcolonial island societies: Fiji and the Solomon Islands in the Pacific', *Island Studies Journal*, 11(2), pp. 505–520. Available at: <https://doi.org/10.24043/isj.364>.
- Rooney, M.N., 2021. "We want development": Land and water (dis)connections in Port Moresby, urban Papua New Guinea', *Contemporary Pacific*, 33(1), pp. 1–30. Available at: <https://doi.org/10.1353/cp.2021.0001>.
- Ross, C., 2024. *Liquid Empire: Water and Power in the Colonial World*. Princeton: Princeton University Press. Available at: <https://doi.org/10.1515/9780691261232>.
- SADRI, 2021. *Drought Resilience Profiles | Mauritius, Report by Southern Africa Drought Resilience Initiative*. Available at: <https://www.ciwaprogram.org/wp-content/uploads/SADRI-Drought-Resilience-Profile-Mauritius-1.pdf> (Accessed: 8 March 2025).
- Salverda, T., 2024. 'The colour of wealth concentration: the defence of economic privilege and multicultural ideology in postcolonial Mauritius', *Canadian Journal of Development Studies / Revue canadienne d'études du développement* [Preprint]. Available at: <https://doi.org/10.1080/02255189.2023.2298791>.
- Sattar, E., 2022. Comparing Colonial Water Legacies: Flow and Stagnation in Legal Development. *Buffalo Environmental Law Journal* 29 (1), 55–95.
- Schulz, C., et al., 2017. The value base of water governance: a multi-disciplinary perspective. *Ecol. Econ.* 131, 241–249.
- Segurado, R. et al., 2014. 'Integrated analysis of energy and water supply in islands. Case study of S. Vicente, Cape Verde', *Energy*, 92(Part 3), pp. 639–648. Available at: <https://doi.org/10.1016/j.energy.2015.02.013>.
- To, L., Seebaluck, V., Leach, M., 2018. Future energy transitions for bagasse cogeneration: Lessons from multi-level and policy innovations in Mauritius. *Energy Res. Soc. Sci.* 35, 68–77. <https://www.sciencedirect.com/science/article/pii/S2214629617303833>.
- UN (no date) *About Small Island Developing States*. Available at: <https://www.un.org/ohrls/content/about-small-island-developing-states> (Accessed: 27 March 2025).

- Underhill, V., Sabati, S., Beckett, L., 2025. Against settler sustainability: California's groundwater as a vertical frontier. *Environment and Planning E: Nature and Space* [Preprint]. Available at: <https://doi.org/10.1177/25148486221110434>.
- United Nations, 2019. *World urbanization prospects - population division, United Nations*. Available at: <https://population.un.org/wup/Country-Profiles/> (Accessed: 26 October 2023).
- Varela, L.H.F., 2016. 'Challenges to the human right to water and to the sustainability of services in Santa Cruz, Cabo Verde', *Ambiente e Sociedade*, 19(1), pp. 207–226. Available at: <https://doi.org/10.1590/1809-4422ASOC150167R1V1912016>.
- van der Velde, M. et al., 2007. 'Sustainable development in small island developing states: Agricultural intensification, economic development, and freshwater resources management on the coral atoll of Tongatapu', *Ecological Economics*, 61(2–3), pp. 456–468. Available at: <https://doi.org/10.1016/J.ECOLECON.2006.03.017>.
- Water Global Practice, 2018. *Timor-Leste Water Sector Assessment and Roadmap*.
- Water PNG, no date. *Water PNG: History*. Available at: <https://www.waterpng.com.pg/index.php/aboutus/history> (Accessed: 13 May 2024).
- Weisbrot, D., 1981. Customizing the Common Law: the True Papua New Guinea Experience. *American Bar Association Journal* 67 (6), 727–731.
- White, I., et al., 2007. 'Challenges in freshwater management in low coral atolls', *Journal of Cleaner Production*, 15(16), pp. 1522–1528. Available at: <https://doi.org/10.1016/j.jclepro.2006.07.051>.
- World Bank, 2005. *Construction and Operation of a 83.0 MW Coal / Bagasse-Fired Power Plant at Savannah*.
- World Bank (no date) *Mauritius*. Available at: <https://data.worldbank.org/country/mauritius?view=chart> (Accessed: 10 October 2024).
- World Population Review (no date) *Infrastructure Spending by Country 2025*. Available at: <https://worldpopulationreview.com/country-rankings/infrastructure-spending-by-country> (Accessed: 26 March 2025).
- Yapao, G. et al., 2012. 'Papua New Guinea: Conflicts, customary landholding and resource exploitation'. In: *Community Futures, Legal Architecture*. Routledge, pp. 77–94. Available at: <https://doi.org/10.4324/9780203123119-6>.
- Zadeh-Cummings, N., 2022. *Through the looking glass: Coloniality and mirroring in localisation*, The Humanitarian Leader. Working Paper 031. Burwood, Australia: Deakin University. Available at: <https://doi.org/10.21153/THL2022ART1693>.