



COMMITTEE FOR MINERAL RESERVES INTERNATIONAL REPORTING STANDARDS

To:

Scott Foster, Director

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July 12 2021

**Draft United Nations Framework Classification for Resources (UNFC)
Supplemental specifications for minerals projects**

Comment from the Committee for Mineral Reserves International Reporting Standards (CRIRSCO)

1. The supplemental specifications for minerals are supplemental to the generic specifications contained in Section IV. Generic Specifications contained in United Nations Framework Classification for Resources Update 2019 (UNFC 2019), ECE ENERGY SERIES No 61.
2. The supplemental specifications begin with Chapter IV, item 27 on page 16 of the DRAFT. Items 1-26 are therefore superfluous.
3. The content in italics throughout the document is contained in UNFC 2019 and should not be repeated here.
4. Some of the terminology used in the document is not in general use in the minerals industry for example source and product.
5. Common terms from the minerals industry such as Mineral Resource and Mineral Reserve are not linked to the Supplemental specifications.
6. The “management” of resources is mentioned several times but is not defined or explained.
7. The CRIRSCO Template is based on two axes; geological confidence and application of Modifying Factors which include techno-economic and environmental and social considerations. The geological confidence is therefore of critical importance yet the generic specification I. Confidence levels for G1, G2, G3 contained in UNFC 2009 is not included in UNFC 2019 or in the Supplemental specifications. This is considered a serious omission.
8. The difference between the functions of the Evaluator and Competent Person is not clear.
9. It should be noted that the CRIRSCO Template has a standard definition for a Competent Person and any deviation from that definition is confusing.
10. The discussion around the qualifications and ethical standards of a Competent Person (Items 69-78) is not appropriate for a document of this nature.
11. With reference to Item 80 when transferring estimates from UNFC to the CRIRSCO Template the requirements for a Competent Person as defined in the CRIRSCO Template will apply.

12. Matching the classifications through the Bridging document for the purposes of database compilation for use in strategic planning would be different from preparing a classification for public reporting.
13. The document contains a mixture of several very broad generalisations mixed with very specific comments on selected topics (e.g. items 17, 18 on page 8 - estimating quantities for ISR projects) which seem out of place in a document of this nature.

This document is intended for a broad audience including policy makers, yet it is difficult to understand even for many mining professionals. This document does not meet the standards set by the Professional Organisations which are members of CRIRSCO and if issued in this form it would be a poor reflection of the Minerals Industry.

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