



GEOSCIENTISTS  
GÉOSCIENTIFIQUES CANADA®

July 13, 2021

UNECE Expert Group on Resource Management  
[reserves.energy@un.org](mailto:reserves.energy@un.org)

**RE: Geoscientists Canada's Comments on the Draft United Nations Framework Classification for Resources Supplemental Specifications for Minerals Projects**

Dear Mr. Gotsis, Mr. Foster, and UNECE Expert Group on Resource Management:

Thank you for the opportunity to offer feedback and opinion in response to your request for comments regarding the "United Nations Framework Classification for Resources Supplemental Specifications for Minerals Projects". We applaud your efforts to improve the document through public and professional consultation and hope that you will take this and all responses into consideration in the spirit of collaboration.

Geoscientists Canada does not wish to duplicate comments that were made by CRIRSCO, however we strongly encourage your efforts to ensure that the resource and reserve definitions and standards for mineral projects be harmonized and consistent with those within the CRIRSCO template. The template is well established, having been adopted universally by the major mining jurisdictions, and it ensures that consistent standards are applied globally. We acknowledge that the UNFC definitions do attempt to harmonize all resources, of which mineral resources are a subset, at the same time as linking with the CRIRSCO template. However, we strongly encourage the preferential use of the existing common language and definitions developed by CRIRSCO over the creation of new definitions, as the latter has the effect of reducing clarity in well-established jurisdictions. The use of terms and definitions that are already an established part of technical and commercial reporting will speed the adoption of the UN Framework Classification and ensure universal acceptance.

Geoscientists Canada also wishes to firmly emphasize the importance of the concept of the Qualified Person / Competent Person (QP/CP). Geoscientists Canada is of the opinion that only qualified professionals that have the relevant knowledge and competence, the appropriate education, the proper level of experience, and overall high ethical standards should be providing opinions and reporting on Mineral Projects that have a very high level of technical complexity and societal significance. It is also important that a QP/CP should ultimately be responsible and publicly accountable for the guidance they provide, as this provides a greater incentive to professional and legal adherence to frameworks and standards.

The QP/CP should be current, always follow best practices, recognize the limits of their expertise and be able to demonstrate independence when required. They should also be continuously monitoring the state of the art and increasing or extending their skill set and knowledge base when and where required.

While subjectivity is omnipresent in the earth sciences and mineral resources, open and unbiased peer review must be in place to establish and maintain public trust.

Although it is understood that not all jurisdictions worldwide have the legal framework in place, it is Geoscientists Canada's opinion and recommendation that the QP/CP must belong to a professional body that has the ability to investigate and discipline, ensure that the QP/CP can be held responsible for their work and/or

**Kevin Ansdell, P.Geo.**  
President  
Président

**Yuri Kinakin, P.Geo.**  
President-Elect  
Président élu

**Michael Parkhill, P.Geo.**  
Past-President  
Présidente sortante

**Doug Bell, P.Geo.**  
Treasurer  
Trésorier

**Andrea Waldie, P.Geo.**  
Chief Executive Officer  
Chef de la direction

T: 604.412.4888  
[info@geoscientistscanada.ca](mailto:info@geoscientistscanada.ca)

Suite-200  
4010 Regent Street  
Burnaby, BC CANADA  
V5C 6N2|  
[geoscientistscanada.ca](http://geoscientistscanada.ca)



GEOSCIENTISTS  
GÉOSCIENTIFIQUES CANADA®

Kevin Ansdell, P.Geo.  
President  
Président

Yuri Kinakin, P.Geo.  
President-Elect  
Président élu

Michael Parkhill, P.Geo.  
Past-President  
Présidente sortante

Doug Bell, P.Geo.  
Treasurer  
Trésorier

Andrea Waldie, P.Geo.  
Chief Executive Officer  
Chef de la direction

opinions, and for which the protection of the public and the environment is the primary concern.

Minor specific technical comments for your consideration are included in the attached copy of the Draft United Nations Framework Classification for Resources Supplemental Specifications for Minerals Projects.

Again, thank you for this opportunity to provide comment. We look forward to reviewing subsequent versions of this document, as we believe that Geoscientists Canada can continue to provide a pertinent and valuable perspective, particularly relating to the need for strong regulation and authority over QP/CP as applied to the reporting of Minerals Projects.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Kevin Ansdell'.

Kevin Ansdell, Ph.D., P.Geo., FGC  
President

A handwritten signature in blue ink, appearing to read 'Garth Kirkham'.

Garth Kirkham, P.Geo., FGC  
Chair, Securities Committee

T: 604.412.4888  
info@geoscientistscanada.ca

Suite-200  
4010 Regent Street  
Burnaby, BC CANADA  
V5C 6N2|  
[geoscientistscanada.ca](http://geoscientistscanada.ca)