

**Subject: Public Comment on DRAFT GUIDANCE FOR APPLICATION OF UNFC FOR MINERAL AND ANTHROPOGENIC RESOURCES IN EUROPE from Committee for Mineral Reserves International Reporting Standards (CRIRSCO)**

**6 June 2022**



COMMITTEE FOR MINERAL RESERVES INTERNATIONAL REPORTING STANDARDS

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Guidance for the Application of the United Nations Framework Classification for Resources for Mineral and Anthropogenic Resources in Europe.  
In response to the call for public Comment.

1. It would be helpful if the authors of this document could be identified, along with their education and professional qualifications.
2. It would also be helpful to identify the review process undertaken prior to publication that this document has been exposed to within the structures of the EGRM.
3. As this is a major project for the EGRM, can we be informed on the budget allocated for this project, who allocated and funded the budget and who controlled adherence to that budget
4. The objective of the guidance is stated as;
  - Regional European resource management
  - National resource project management
  - Company internal business process innovation

Later in the introduction, however the document states that the guidance is provided to facilitate the establishment and/or maintenance of a UNFC raw materials project-based inventory.

Some clarity should be provided as to who will control the data base, who is responsible for updating and maintaining of the data base and how the information contained within the data base will be validated and curated.

5. The document refers to Resource management but also refers to Raw Materials. The difference is not explained nor are the expected outcomes. This is further complicated by the use of the term Critical Raw Materials which is also not defined. (Table 1 P19)
6. The impression is given that the inventories compiled will be derived from Resources within the confines of the European Union. Our understanding, is however, that UNECE is compiling an inventory, on a global basis, of those Critical Raw Materials necessary to achieve the climate change targets. This should be clarified.
7. Mention is made on Page 5 of classes being linked to various EU instruments such as INSPIRE. The Inspire metadata only deals with two-dimensional geographic location (ie latitude and longitude). For minerals projects, some guidance should be given on how to handle projects which may physically overlie one another in the same location (eg. a near surface weathered deposit and a much deeper deposit, possibly for another mineral).

8. Viable projects (Page 6). The same project could be considered to be viable to one entity and not viable to another entity. Some guidance should be given on the need to specify the 'threshold' criteria that have been used to determine project viability. For many mineral projects assumptions on commodity prices are critical, particularly those with gradational boundaries. Changes in the price assumptions would significantly change the estimates of quantities and qualities for the same 'project' (or does a project include the assumptions such that the same physical occurrence may have multiple projects associated with it?).
9. Figure 2 – the title includes reference to the Technological Readiness Level (TRL) but no explanation is given as to what this is – the term is not used in UNFC 2019. And no linking reference is provided.
10. Annex 1, Page 12 refers to the latest version of the CRIRSCO Bridging Document. The link provided is to the 2015 version of the document. Annex 1 Page 12 also refers to the CRIRSCO Template 2013 whereas the latest published Template is November 2019.
11. Para 3 in the introduction states: "To enable capital allocators to assess the opportunities and risks that projects represent for climate and with respect to the other goals set for the activities as well as the opportunities and risks related to the physical and regulatory uncertainties that climate change and reforms represent for investors" This is potentially misleading in that UNFC contains no guidance on risks and uncertainties regarding climate change.
12. Mining project – (Page 6) no reference is made to the data required to estimate quantities and qualities for a mining/ mineral project. No reference is made to the use of appropriate methods for estimating and classifying quantities and qualities which make up the G-axis, which in the context of Mineral projects, is fundamental.
13. Page 6 In production; The only difference between a mine operating continuously and one operating intermittently is the addition of G3 which is a resource category (Inferred Resources) This seems a strange differentiation.
14. Clause iv page 10 Conclusions and recommendations; "*Develop high security and quality shared data management facilitating the work of both preparers and users making sure both have strong professional and economic interests in the results*". Clarification is sought on what is meant by "strong professional and economic interests".
15. Table 1 Policy Potential E categories; The Critical Raw Materials (CRMs) should be listed
16. Table 9 Social Potential E categories. the heading looks at the level of engagement. The different categories state the level of support. The level of engagement is very different to the level of support.
17. Minerals Terms: The term Mineral Source is not one recognised by CRIRSCO and is not mentioned in any Bridging documents between UNFC and CRIRSCO.

Submitted on behalf of CRIRSCO

By J.R. Dixon Pr. Eng. BSc (Hons) Mining FSAIMM.

South African Representative

E Sides PhD, Geol (IGI), Euro Geol,

Pan European Representative

M Burnett MSc (Mineral Resource Management), C. Geol (GSL), Euro Geol

Pan European Representative