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Comment of

DRAFT  
UNFC FOR EUROPE GUIDANCE

Guidance for the Application of the United Nations  
Framework Classification for Resources for Mineral and Anthropogenic Resources in Europe

In my personal opinion in the next sentences need add, next words (in red color):

At 6 page:

1. The minerals project plan may be detailed or conceptual (in the case of long-term national resource planning, **by law**).
2. The estimation of quantities shall be done in accordance with professional quality assured methods **and in accordance with formal conditions of national law for competent person**.

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3. Exploration projects: Potential future recovery by successful exploration activities **in the prescribed manner in accordance with the obtained approvals**.
4. **Development pending** is limited to those projects that are actively subject to project-specific technical activities, such as the acquisition of additional data (e.g., appraisal drilling **at exploration plan**).

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5. Then the upside is excluded for financial reporting purposes in order not to mislead investors that unmeasured quantities are investment grade, **and without added evaluation**.

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6. While the defined Classes and Sub-classes may be used as supplementary terminology, the relevant Numerical Code(s) shall always be reported in conjunction with the estimated mineral or anthropogenic resource quantity and its associated social, environmental, economic, technical and confidence in estimates / level of knowledge information **and its verification at date**.

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7. **Anthropogenic Resources:** Where a Project produces more than one Anthropogenic Material Product (e.g. copper and zinc), the quantities for each shall be estimated and included in a single report for the Project, **at of law**.
8. Any deviation from this location shall be clearly justified **and in the procedure or manner prescribed by law**.

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9. For public reporting (to stock exchanges, financial institutions etc.) evaluators must possess an **academic qualifications** and appropriate level of expertise and relevant experience in the estimation of quantities associated with the type of resource source under evaluation. (See rules of the relevant entity where reports are to be filed).

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10. Where production activities are suspended, but there are “reasonable prospects for economic, social and environmentally viable production for sale in the foreseeable future”, remaining quantities that can be technically produced shall be re-classified from E1 to E2. Where “reasonable prospects for economic, social and environmentally viable production for sale in the foreseeable future” cannot be demonstrated, remaining quantities shall be reclassified from E1 to E3, **by competent persons**.

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11. c) F3.3: at the earliest stage of studies, where favorable conditions for the potential discovery of a mineral deposit or anthropogenic resources in an area may be inferred from regional studies, **by competent persons**.

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12. In some situations, it may be helpful to express a range of uncertainty for mineral or anthropogenic quantities that are classified **in a professionally qualified manner** on the G axis as G4, e.g., Exploration Projects. In such cases, the following specification shall apply:

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13. It is therefore recommended that the lists below be reviewed and that the final categorization to be applied be chosen based on a balanced judgement **by competent person** of the likelihood that the project may be impaired if one or more of the controlling factors are not met, or if other conditions apply in a specific case that must be taken into account.

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At table 3:

14.	Right to keep exploration rights by performing work	Yes/No/unknown	E3.2 (Yes) E3.3 (No, unknown)	Should be E3 because it's exploration? <b>Yes!</b>
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15. **Exploration permit**  
(early exploration: **prospection, geophysics, ...**)

**Exploration permit**  
(advanced exploration;  
exploration works: **drilling,**  
**metallurgy, ....**)

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16. The Environmental Impact Assessment (EIA) Directive (2011/92/EU) requires Member States to carry out environmental impact assessments of certain public and private projects, before they are authorized **by the competent authorities**, where it is believed that the projects are likely to have a significant impact on the environment.
17. The Extractive Waste Directive sets up measures, procedures and guidance to prevent or reduce the possible adverse effects of the management of mining wastes (wastes from the extractive industry) **as secondary sources of CRM**, on the environment, fauna and flora, as well as water, air and soil and human health.
18. Land use types are designated according to their nature and location, **law regulation**, their contribution to fulfilling existing societal needs, and general long-term sustainable development objectives. Close coordination between land use planning and mineral planning, zones designated as "raw material priority areas", raw materials designated of national interest are some of the instruments used by MS for land use planning.

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19. **Mining Methods** There are numerous conventional and unconventional mining methods, which could be utilized to exploit mineral resources. Each has its pros and cons depending on situation-specific characteristics like deposit type, ore morphology, mineralization style, mineralization depth, rock mechanics, safety, **national interest and** geopolitical factors, infrastructure, economics etc.

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20.

Site-specific geological studies and exploration activities have identified the potential for an individual deposit with sufficient confidence **by permit .....**

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21. This activity helps to meet the target of SDG 12 "Responsible Production and Consumption" on waste minimization through prevention, reduction, recycling and reuse **at by new projects and by law.**
22. Defining the Project: An anthropogenic material sourcing Project is a defined development or sourcing operation, which provides the basis for socio, environmental and economic evaluation

and decision-making **by standards and law**. In the early stages of evaluation, including exploration, the Project might be defined only in conceptual terms, whereas more mature Projects will be defined in significant detail, **including permit**.

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23. In order to assign Anthropogenic Resources to any class, except for Category F4 (no development project or sourcing operation has been identified), a development plan consisting of one or more Projects needs to be defined, **by adequate permits**.

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Generic terms

**Bridging Document**

A document that explains the relationship between UNFC and another classification system (**international or national**), including instructions and guidelines on how to classify estimates generated by application of that system using the UNFC Numerical Codes.

24.

**25. Evaluator**

**Competent** person, or persons, performing estimation and/or classification.

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26. Uncertainties refer to all parameters that influence both variabilities in the Anthropogenic Material Source and the efficiency of the recovery and conversion methodology (where relevant **evaluated by competent persons**).

27.

A deposit that has not yet been demonstrated to exist by direct evidence (e.g., drilling and/or sampling), but is assessed as potentially existing based primarily on indirect evidence (e.g., surface or airborne geophysical measurements, **historical mining data, ...**).

Belgrade, 05 Jun 2022.

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