

Subject: Public Comment on DRAFT GUIDANCE FOR APPLICATION OF UNFC FOR MINERAL AND ANTHROPOGENIC RESOURCES IN EUROPE from the specialists of the State Commission of Ukraine on Mineral Resources

6 June 2022

1. According to the text (p. 6, paragraph 4;) and tables (p. 8), the possibility of operational activities is indicated for G3 resources in the characteristics of viable and potentially viable projects.

In our experts' opinion, any resource of G3 category should be considered as such that requires additional comprehensive research, provided the successful development of G1 and G2 resources, based on the mining experience in Ukraine. As a practical example, there are only a few successful projects in Ukraine that develop G3 resources (including amber placer deposits, redevelopment of technogenic open-cast iron ore deposits with previously lost resources during underground mining, development of quartz raw materials in chamber pegmatites). All objects are characterized by highly complex geological structure.

We agree with footnotes to the Table 2 and propose to extend the use of footnote b to G3 resources for viable and potentially viable projects.

2. It is recommended to add the notion of Organization or competent Organization to the definition of the term "Evaluator".

Regarding the term "Mineral Source", the following wording is recommended – "material formations of organic and inorganic origin in the subsoil, on the earth's surface, in water and gas sources, at the bottom of reservoirs, as well as technogenic material formations in places of production waste disposal and loss of mineral raw material processing products suitable for commercial use".

3. The notes on page 7 marked as F4E3.3F4G1,2,3 probably need to be corrected to E3.3F4G1,2,3 or explained.

4. Regarding the term "Effective date", it should be noted that information is subject to rejection during the project evaluation in cases when more relevant data becomes available and its use leads to changes in the final project evaluation. For example, a price rise leads to a change in project's considerations.