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United Nations Economic Commission for Europe

COMMENT LETTER FOR THE DRAFT GUIDANCE FOR APPLICATION OF UNFC FOR MINERAL AND ANTHROPOGENIC RESOURCES IN EUROPE

Subject: Public consultation

Document: Draft guidance for application of UNFC for mineral and anthropogenic resources in Europe

The Guidance document is comprehensive and touches many important points relevant to exploration and mining and support the goals for sustainable resource management. Such a guidance needs also to be balanced between prescriptiveness and degree of freedom as the exploration and mining projects are very different (commodities, deposit type, and style of mineralization). However, when evaluator is mapping quantities into UNFC, as part of INSPIRE coding, the mapping should principally be viewed as classification, not estimation of resources, forecasting, nor reporting. Therefore, prescriptive guidance on how to use the INSPIRE code list in relation to UNFC Sub-categories may be applicable to ensure consistent and coherent implementation of the UNFC for resource management in Europe.

The operating environment, from exploration to mining, is dominated by publicly listed and privately-owned entities. Companies looking for investments must adopt and comply with national or international codes of practice for public reporting (CRIRSCO-type reporting standards and codes) due to the Securities Exchange recognition. Privately-owned mining companies do not have the same requirements for preparation and publication of technical information. However, some privately-owned companies have elected to adopt the relevant code as a voluntary basis as many financiers expect to see technical documentation and reports prepared in accordance with these codes of practice, to assist with reviewing the funding application.

CRIRSCO-type reporting standards and codes include only quantities that have demonstrated or assumed Reasonable Prospects for Eventual Economic Extraction (RPEEE). Therefore, no non-sales or non-viable products are included in public reporting. Whereas these so-called “inventories”, non-viable projects, and remaining products not developed from prospective nor identified projects, can be classified in accordance with the UNFC. These can be either (1) non-active projects without a current asset owner or (2) non-active and/or active projects with asset ownership. These types of quantities include, e.g., historical and abandoned mines, historical mine-waste sites (tailings facilities,

waste rock piles, and water-treatment sludges), and mineral occurrences or deposits which may still contain valuable minerals not detected by contemporary analytical methods or were not considered to have economic value during the time of investigation.

When quantities are mapped in accordance with the UNFC-2019 and linked to different resource databases (e.g., INSPIRE), the evaluator must reflect the "true" situation of the project and thus, strictly avoid interpretation and forecasting. First comes a consistent and coherent classification to the UNFC and later resource information may be used for various purposes (e.g., commodity forecasts, potential assessments for critical raw materials, and commodity-specific self-sufficiency analyses). That said, evaluator should avoid interpreting the Non-Viable Projects ("non-sales quantities") "too far" if there is no active project and/or a current ownership to the asset. This would include too optimistic or high-confidence estimates related to EFG-axes in situations where currently no commercial interest exists.

Example 1:

A historic mine includes several million tons of low-grade chalcopyrite-pyrite ± cobalt mineralized rock not considered economic during the life of mine.

Scenario 1. *Currently, there is a company that has secured the asset by holding an exploration license in the property. Company is currently commencing a drilling campaign for verification purposes and preparing a Public Report with an updated Mineral Resources estimate.*

The results were reported in the property as Inferred Resources of 5 Mt at 0.14 % Co, 0.34 % Cu

INSPIRE Database: E2F2.1G3 (not E3.2F2.2G3) 5 Mt at 0.14 % Co, 0.34 % Cu

Scenario 2. *Currently, no company have shown interest towards the property and there is no active project to develop the prospect. A Governmental Survey Organization (GSO) reviewed all historical documentation and considered all relevant technical aspects and geological information related to the historical project.*

The quantities were based on historical data only and the estimate resulted 9.5 Mt at 0.09 % Co, 0.7 % Cu

INSPIRE Database: Available Options: E3.3F2.3G3 or E3.3F4G3 or E3.3F3.3G3 or E3.3F3.3G4 Mt at 0.09 % Co, 0.7 % Cu

Frankly, any combination is suitable here. Due to nature of historical data (missing QAQC, old assay data, lacking accurate data points etc.) the G-axis should not be considered better than G3. Yet, some evaluators may not even consider this as a problem and use G1 to G3. Problem is concretized when a GSO estimates quantities without any consideration to cut-off grade. The in-situ tonnage and grade does not indicate the true value of quantities. Nevertheless, E and F axis indicate clearly that environmental-socio-economic viability and technical aspects cannot yet be determined due to insufficient information and more work need to be done.

In either case, there needs to be an entity to eventually extract the recoverable resources and sell the remaining part (after processing) as products to the market. Estimates should always be based on some cut-off grade which defines the lowest threshold of potential viability into the future (e.g. mineralized and non-mineralized rock). Non-viable quantities will stay in the ground till conditions change relevant to, e.g., economic, marketing, legal, environmental, infrastructure, social and governmental factors. Therefore, the estimated quantities need to reflect the true current situation related to project maturity which, e.g., indicate realistic timeframes of saleable product input to the market. Both classifications, UNFC and CRIRSCO, are needed and align with each other to reach the common goal of sustainable resource management in Europe.

Major issues are as follows:

1. **The Guidance document is for Mineral and anthropogenic resources and, therefore, more precise explanatory should be used in respect to the following:**
    a. **Currently there is no description of data types regarded as "quantity" (e.g., tonnage, grade, volume, quality) mapped according to UNFC. In the footnote of Figure 2 it is indicated that also projects can be classified. How is this done in the context of INSPIRE and why is there no examples of this?**
    b. **The Guidance should be written in plain English so that it assists and provides a clear practical way forward to, for example, GSOs mapping the mineral inventory estimations in accordance with UNFC without any risk of misinterpretation or misuse.**

    In mineral and anthropogenic (e.g., tailings, waste rocks) projects, the quantitative units are tonnage and grade, and classification of these quantities should reflect the project maturity and degree of confidence in estimation as precisely and accurately as possible. If there is no mention what is meant by "quantities" and if there is no clear statement of minimum information/prerequisite needed to proceed with classification, the evaluator may classify any project in accordance with UNFC without relevant information. For example, the experience in the Mintell4EU project showed that UNFC classes were considered reasonable also for individual active projects without any information on tonnage, grade, or volume. The UNFC classification was based on background information where the company had reported ongoing activities in scoping or pre-feasibility study, but no quantities had yet been released. In this case, the classification was based according to the project status, not according to estimated quantities. If this is unclear and therefore interpreted to be reasonable in context of mapping resource quantities into national and EU-level databases, we end up in situation where database is not robust (i.e., has missing values) and won't serve as e.g., communication tool of raw materials supply in Europe.

    This guidance should assist and provide clear practical guidance to, for example, GSOs to map mineral inventory estimations in accordance with UNFC without any risk of misinterpretation

or misuse. Based on our understanding, all classes in Figure 2 should have at least some quantity information (tonnage or grade information). If Exploration Target estimation is reported with range of tonnage and range of grade following the CRIRSCO Template, there should be clear guidance how to proceed to end up with one tonnage and grade figure only (e.g., P10, P50, or P90). If there is only information on drilling results (e.g., high-grade intercepts), no classification can be given, unless a scenario-based assessment is estimated by the GSO. These types of regional assessments were completed within the Mintell4EU project by a GSOs to communicate regional potential in a particular area. These types of assessments or estimates are high-estimates, with a high degree of uncertainties, due to low sample density and without any commercial entity considering technical or environmental-socio-economic assumptions. Technical and economic viability aspects cannot be considered by an external organization, but it must always be evaluated by the entity holding the asset, whether it is listed or private company or state-owned entity. However, if these types of estimates are completed, they represent UNFC classes like E3F3G4 or E3F4G4 and the Qualified Expert from the GSO should follow transparency and materiality in reporting such a quantity. Also, should reporting of tonnage and grade figures reflect the relative uncertainty of the estimate by rounding off to appropriately significant figure (e.g., to the second significant figure).

However, if these types of regional quantities become a common way forward and provide a practical solution to many data gaps currently GSOs are dealing with in EU countries (no resource information, no information on operations etc.), it must be communicated somehow clearly in EU level (e.g., Pan-European aggregation will loose this information in databases), that these quantities are not necessarily, by any means, realistic to be counted as raw materials which eventually can be turn into products. In fact, these types of estimates provide only scenario-based figures that can help governments, and the EU, to invest to a particular potential area if there is, for example, a critical shortage of a certain raw material. The technical aspects (e.g., metallurgical and ore processing tests), as well as geological and grade continuities are still prerequisite through technical studies for any Project (“operation”) to proceed to production.

2. **The INSPIRE Code “*Assessment of Resources (Advanced exploration, Resources definition, Prefeasibility, Scoping study (resources))*” is mapped as Non-Viable Project under sub-class 'Development Unclarified' E3.2F2.2G1,2,3.**

   We suggest that the description is combined with Potentially Viable Projects (E2F2.1G1,2,3) INSIPRE Code “*Evaluation of Resources (Detailed Feasibility, Prefeasibility*)” for the following reasons: (1) It provides a full alignment with CRIRSCO Template which is set in CRIRSCO–UNFC Bridging Document. (2) **Development unclarified** should be used solely for situations where reporting is unclear due to acquisitions or mergers, or operation moves to non-active status. Or in situations where Project moves (“resource quantities”) from **Development Not Viable**

(e.g., mine closed, abandoned) to an active phase (e.g., re-open the mine or assessment of resources).

3. **The INSPIRE Code "*Closed, abandoned and historic*" within Non-Viable Projects and sub-class Development Not Viable (E3.3F2.3G1,2,3).**

   This mapping is technically suitable but there is a major difference between a recently closed mine and a historic mine in respect to EFG-axes, especially for the G-axis. Practically, when company "revisits" a historical mine site to target the extension of known mineralised body, the activity is regarded as exploration and reported results are classified either as E3F3G4 (E3.1F3.1G4) or, if previous data is regarded as accurate and precise based on due diligence and evaluation, into E2F2.1G1,2,3 (new estimate). Also, the mine and other infrastructure may be activated with minor investments if closure of the mine and processing plant is recent. Whereas, if the mine has been closed ages ago the infrastructure may not have any value and geological information had been collected based on old methods affecting the confidence in estimation. The latter situation typically includes data based on small drill machinery (small sample volumes), no accurate collar location nor downhole deviation which would define the location of data points, no Quality Assurance/Quality Control (QA/QC) information to assess the analytical data quality, outdated analytical methods, no 3D software nor geostatistical methods used for more accurate geological and grade estimation, etc.

   Therefore, classification cannot go from E3.3F2.3G1,2,3 to E2F2.1G1,2,3 without first confirming the data quality (e.g., assay grades, existing model), and processing and metallurgical test work. The current owner needs to apply for exploration licenses and assess the magnitude of needed investments (e.g., to activate the infrastructure in-place) to make the operation running. It may well be that the remaining quantities in the ground do not cover the mining and processing costs and, therefore, the project is not profitable.

4. **INSPIRE Code "*Regional reconnaissance (Grassroots)*" is mapped as Prospective Projects E3.2F3.3G4**
   We suggest that the classes for regional reconnaissance (Grassroots) should be reconsidered and modified to E3.2F4G4 or description changed. Grassroots exploration is typically considered as early-stage of exploration to identify the existence of mineral potential or initial targets on a regional scale (e.g., mineral prospectivity modelling, undiscovered resources). Therefore, also F-axis should reflect the highest uncertainty and follow the F4 definition "No development project has been identified". In the CRIRSCO–UNFC Bridging Document, Exploration Target is defined as E3F3G4 which would be done typically before resource definition drilling to indicate ore potential in a particular target, which is not regional reconnaissance.

5. **If an exploration project with a maiden resource (INSPIRE Code list: *assessment of Resources, Resources definition, Prefeasibility, Scoping Study*) is forced to be abandoned due to geological and technical reasons (e.g., negative results from pre-feasibility study or**

challenging geological conditions), how should the resource quantities be mapped in accordance with UNFC? This would mean that the original resource classes are no longer meaningful and must be communicated by downgrading the classification.

a. **Development Unclarified** is not suitable if there is no current asset holder, therefore, the project is determined as Non-Active.

b. **Development Not Viable** is suitable but, as being an exploration project, there is no development done in the property (e.g., no infrastructure in-place). In these cases, it is illogical that only the E-axis is downgraded, to E3, but F-axis is still at F2 (F2.3). In closed mine environments, this is more reasonable as the infrastructure is in place and is a potential asset. In GTK, we have mapped such quantities which are no longer CRIRSCO-compliant Resources to E3F3G1,2,3 due to entity abandoning the project (non-active projects status) or acquired by a new owner which has not yet updated the resource estimate. In the latter case, even better might be if mapped as E3.2F2.2G1,2,3, because the UNFC class would then indicate that development is active but unclarified.

6. **The Sectoral Guidelines (ANNEX 2) for E axis is very interesting approach but also raises some questions as follows:**

a. Does the lowest ranking issue mean that it prevails also between the topics described in Tables 1 to 14?

b. How is the country-specific Mining Law and/or Act considered and taken into account as it is very different between EU Member States (e.g., in permitting and licensing)? Also, the national/regional/local (political) interest may have an effect to approvals process in both positive and negative sense.

c. How can topics such as policy, legal framework, regulatory approval, social considerations, and economic considerations be compared with each other, if the same E4-E1 categories are applied to all of these? Who really can make a balanced judgement considering the number of relevant topics and issues?

d. The issues addressed in Tables 1 to 14 need information which are scattered between various governmental organizations, e.g., mining authority, ministry, local government, and entities holding the asset. It might also be difficult or even prohibited for governmental organizations to give out probabilities of approval or otherwise indicate any viewpoint during the process when application is pending. This can be viewed as ethical issue and conflict of interest. Shouldn't a public organisation, such as a GSO, be strictly neutral for such issues?

e. How is this data collected and managed (e.g., application or software platform?) and is this data collected in INSPIRE?

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Table 1. Detailed matters from the document 'Draft UNFC For Europe Guidance'. Each question, comment and suggestion is given a generic number (No., the first column of this table) which is referred in the "Draft guidance for application of UNFC for mineral and anthropogenic resources in Europe" document.

No.	Heading/Section	Page	Questions	Comments/Suggestions
1		3	What is 'Prospection'?	This expression must be explained as it has many meanings depending on context.
2	Executive Summary	5	"European raw material inventories, both primary and secondary resources, can be reported in UNFC using the definitions and guidelines provided in this document."	Any raw materials inventories can be reported in UNFC, not only European.
3			There is no mention what type of data should be reported (e.g., tonnage and grade, tonnage and quality information, volume & quality)?	
4	In Production	6	Quantities associated to a mine operating continuously (INSPIRE code list "operating continuously") should be classified as E1.1F1.1G1,2,3 Why there is G3? Quantities associated to a mine operating intermittently (INSPIRE code list "operating intermittently") should be classified as E1.1F1.1G1,2 Why there is not G3? What is the distinction for G-axis when comparing the continuously and intermittently operated mines?	Generally, we would be looking at Probable and Proven Reserves for quantities associated to an operating mine which level to as Proven Mineral Reserves →E1, F1, G1 Probable Mineral Reserves →E1, F1, G2 (UNECE, 2015) Maybe, for some industrial mineral project and aggregates the certainty for G-axis could be G3, as information has not been disclosed by the operator, but for majority this is not the case. Therefore, G3 should not be used with E1F1 and anything with G3 should be aligned with no better category than E2F2.
5	In Production	6	Quantities **In production** have been subdivided into operations which operate	For Commercial Projects reported in accordance with the CRIRSCO Template, the intermittency in operation, in long-

			continuously and intermittently with classification of E1.1, F1.1, G1,2,3 and E1.1, F1.1, G1,2, respectively. Why is the intermittency classified E1.1, F1.1, G1, G2 if there may not be ongoing production at the time? The description for 'In production' clearly states that the project is producing and supplying commodity product(s) to the market at the Effective Date of the evaluation (E1F1.1)? Intermittency could also be interpreted as a development pending or on hold. This should be better clarified in the footnote 7.	term causing production to be disrupted, would mean re-evaluation as stated: "If the re-evaluation indicates that any part of the Mineral Reserves is no longer viable, such Mineral Reserves must be re-classified as Mineral Resources and be removed from the Mineral Reserves statements." (CRIRSCO, 2019). What is the period of intermittency referred here? When mapping CRIRSCO-compliant quantities, the Public Reports should be carefully reviewed and referenced.
6	Justified for Development	6	"…reasonable expectation that all necessary approvals/ contracts for the project to proceed to development will be forthcoming (E1F1.3)" Is reasonable expectation sufficient for E1, if the necessary approvals/contracts (e.g., permitting) are not in place?	There is a high risk of misleading interpretation which leads to confusing classification, differences between exactly similar cases.
7	Development pending	6	Quantities associated with a detailed feasibility study (INSPIRE code "feasibility") E1F2; E2F1; E2F2.1	Currently, E2F2.1 is only recognized in CRIRSCO. Therefore, CRIRSCO-compliant Mineral Resources can only be E2F2.1G1,2,3 but not E1F2 nor E2F1.
8	Development on hold	6	"…but where there are currently major non-technical contingencies (e.g., environmental, or social issues) that need to be resolved before the project can move towards	If there are major non-technical contingencies that need to be resolved before the project can move towards development, E-axis value cannot be E1. In other words, there cannot be Mineral Reserves (CRIRISCO) reported if operation is put on care and

			development." Quantities associated to a mine under care and maintenance (INSPIRE code list "care and maintenance") should be classified as **E1**F2.2; E2F1; E2F2.2	maintenance due to non-technical contingencies.
9	Development on hold		Quantities associated to a mine under care and maintenance (INSPIRE code list **"care and maintenance"**) should be classified as E1F2.2; E2F1; E2F2.2 Quantities associated to a mine that can be **kept unexploited until the price of contained commodity(ies) makes it economical** (INSPIRE codes list "retention") should be classified as E2F1; E2F2.2	What time frames are we talking about here? In UNFC-2019, it is stated "Where development or operation activities are suspended, but there are "reasonable prospects for environmentally, socially and economically viable production in the foreseeable future", the project shall be reclassified from E1 to E2. Where "reasonable prospects for environmentally, socially and economically viable production in the foreseeable future" cannot be demonstrated, the project shall be reclassified from E1 to E3." For example, Langer Heinrich Uranium mine (Namibia) has been on care and maintenance since 2018 (www.paladinenergy.com.au). The deposit is of surficial calcrete type deposit containing a JORC Code (2012) compliant Mineral Resource of 119.7 Mlb U_3O_8 at a grade of 445 ppm U_3O_8 and 38.8 Mlb V_2O_5 at grade of 145 ppm V_2O_5 at a cut-off of grade of 250ppm U_3O_8. UNFC: (E2F2G1-3) and E and F using appropriate sub-categories definition.
10	Non-viable project		Non-viable project is written with lowercase letters.	Capitalization should be checked throughout the report and used in consistent manner.
11	Development unclarified	6	**"Development unclarified** is appropriate for projects that are in the initial stages of technical and economic evaluation (e.g., a recent new discovery), and/or where significant further	This is somewhat confusing and will impose high risk of misinterpretation and misuse!- If understood correctly, the **development unclarified** is used for a project that is at "inventory phase" and

			data acquisition is required, to make a meaningful assessment of the potential for an economic development…" E3.2F2.2 – Involves drilling to add additional recoverable quantities (INSPIRE code list "advanced exploration") E3.2F2.2 – Indicates that initial recoverable quantities have been calculated (INSPIRE code list "resources definition")	acquiring data for resource definition (e.g., prior to Maiden Resource). Then, the result (= resources tonnage and grade) should be reported using the following classes E2F2.1G3,2,1 or (E2F2.2G3,2,1) not E3.2F2.2G3,2,1. This way, it would also be align with CRIRSCO as defined in CRIRSCO-UNFC Bridging Document (UNECE, 2015). It is illogical that company/entity would invest ~1 million € for a Pre-feasibility Study that is defined as a Non-Viable Project.
12	Development unclarified		'Development unclarified' is described as Assessment of Resources (Advanced exploration, Resources' definition, Prefeasibility, Scoping study (resources)) in the INSPIRE Code list.	Another thing is that what quantities are then going into this category **Development unclarified**? For example, commercial-listed exploration and mining companies usually report only Exploration Results (e.g., down-hole or true width of mineralized intercepts, preliminary mineralogical/metallurgical tests, and area of potential) and seldomly Exploration Target Results with range of tonnes and range of grade. The next Public Report comes out if project successfully moves towards Scoping Study and produces the Maiden Resource estimate, typically with Inferred Resources and Indicated Resources. This would already be mapped as E2F2G2 or G3 in accordance with the Bridging Document. The CRIRSCO-UNFC Bridging Document defines the Exploration Target Results (before resource definition) to be 334. In other words, we have either exploration or development, and the rest are "barriers" or "roadblocks" that project encounter before able to start production.
13			E3.2F2.2 – Involves drilling activities **to add additional recoverable quantities** (INSPIRE code list "advanced	There is no difference between these classes, as both are given 'E3.2F2.2', but the description has a huge difference (highlighted). To estimate Recoverable

			exploration") E3.2F2.2 – Indicates **that initial recoverable quantities have been calculated** (INSPIRE code list "resources definition") *These are always estimations not calculations (never precise)!	resources, we need minimum of Indicated or Measured Resources (not Inferred). Therefore, E3.2F2.2 is not aligned here with CRIRSCO and the Bridging Document as it should, in fact, mean E2F2G2 and E2F2G1 Indicated and Measured Resources, respectively).
14	Development not viable	7	"**Development not viable** is used where a technically feasible project can be identified…" Quantities associated to a mine closed for technical, economical, or techno-economic reasons (INSPIRE code list "closed") should be classified as E3.3F2.3G1,2,3.	First, it is stated that it is used where a technically feasible project can be identified but quantities associated to closed mine for technical … reasons. This wording doesn't make sense at all, as it cannot possibly be a technically feasible project!
15	Development not viable	7	Development not viable is emphasizing to technically feasible project but could there also be an additional note on geology?	For example: "where a technically feasible and/or geologically favorable project can be identified…". The case may well be that the geological and grade continuity may have been established in relatively good confidence (e.g., for a Critical Raw Material) but the process-technological methods to recover the commodity have not yet been developed.
16	Development not viable	7	Note: quantities in place without plans for recovery should be classified as F4E3.3F4G1,2,3. What is F4E3.3F4G1,2,3? Should it be → F4 (E3.3F4G1,2,3)??	Should it be → (E3.3F4G1,2,3)?? Maybe a typo here? If the "quantities in place" could we also consider F3?
17	Development not viable		Development Not Viable with INSPIRE Code List (*Closed, Abandoned and Historic)* The quantities associated with E3.3F2.3G1,2,3 are local quantities	Typically, the information from historical mines includes the following: total mined rock ("ore hoist"), processed ore, production figures, etc. Less often, there are known reserves and/or resources in the ground which have been estimated but not developed. And if there are such remaining resources, certainly the G-axis

				value cannot be any better than 2, and more probably it is 3. Value G1 would only occur for an active project with Measured Resources.
18			Development Not Viable with INSPIRE Code List (*Closed, Abandoned and Historic)* The quantities associated with E3.3F2.3G1,2,3 are local quantities	There are clearly two groups here: 1. "recently" closed mines which have had modern process technology and mining methodology together with industry best practices and international reporting guideline. 2. Historical mines which are lacking all of these, tunnels are full of water, and the mine infrastructure is old and damaged (no value)! Often the historic mines are lacking quality data but also general information and, therefore, quantities should go into E3.3F2.3G3 or E3F3G3 or even E3F4G3. For historic mines, F2 indicates too high confidence and should be downgraded similarly as for the E and G axes. If old non-active project is re-activated due to changing "modifying factors", the project starts typically from exploration (334 or 333) not from E3.2F2.2G1,2,3. This is because there is no guarantee that geology is favorable for additional mineralized quantities, not to mention that it would ever be economically viable to extract commodities. —
19	Figure 2	8	Prospective Projects (e.g., 3,2 or 3,1 or 3,3) are separated with comma not full stop.	This should be corrected so that it is consistent throughout the table and the entire report. Other categories are separated with full stop (e.g. 3.3 or 2.2)
20	Figure 2	8	The footnote b is not clear and should be revised.	A practical example of this would be good! How this comes down to classification of quantities related to mining and exploration projects?
21	Table 10	25	Preliminary economic assessment (Scoping Study) is referred to as E2.2 We consider that the E2.2 is much more appropriate for any economic assessment that E3.2	This is not aligned with INSPIRE Code List *(Assessment of Resources (Advanced exploration, Resources' definition, Prefeasibility, Scoping Study (resources))* which is E3.2.
22		24-	Governmental (Fiscal), Social	Probability of approval can only be

		25	and Economic considerations are detailed in Tables 8, 9 and 10, respectively. How are the classes given for E-axis as Project should reflect the combination of all issues? How is the classification done if most of the issues are lower (high confidence) than E2.2 but one particular item gives E3.3? Some of the project information needed to assess the E-axis considerations will be difficult to obtain especially from private non-listed companies. The resource definition, when reported in accordance with CRIRSCO, should consider all these aspects. How should the Probability of approval be assessed (high, medium, low)?	based on subjective assessment. This will not result in a harmonized resource classification, as anyone mapping into UNFC may see such matters differently. How is all this information collected and managed? Is there some application or platform for this?
23			In the Tables 11-14 (page. 26 and 28) the spacing between the words should be checked and corrected.	

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