

I have read the draft document with great interest and support much of it. I just want to share a few concerns:

1. I am very wary of the proposed introduction of new E categories by subdivision into E.A and E.B. I appreciate that Groundwater projects are different from minerals and energy projects, as pointed out in the document. However, the UNFC categories are supposed to be a universal “language”. It will degrade the universality and clarity of UNFC if we create different specifications for different resources. I suggest no subdivision. E.A categories are described by the current E categories. I suggest two possible approaches: a) the distinction between E.B type projects is flagged in documentation rather than given a separate category or b) Expand the use of E1.2 and categorise what would be E.B.1.1 projects as E1.2 i.e. E1.2 now includes projects which do not meet normal economic requirements, but could include projects which do not meet other normal requirements but are deemed necessary. Groundwater experts may object that neither of my suggestions work, but we do need to find some way round altering UNFC. It is of the essence that, at the level of the generic specifications, it is the same for all resources.
2. I have a further question about E.B.3 subcategories. I am not sure whether E.B.3.1 is in line with normal meaning of E3.1. E3.2 and E3.3 are not defined.
3. All the text in in the definition and supporting explanation columns should be direct quotes from UNFC 2019 with no alterations or additions. This is not always the case e.g text has been added to E.A.1.1.
4. The first 2 paragraphs on p22 describing the G axis are incorrect, but table 5 is correct for G1/2/3 (and not the same as the text). The text mixes 2 different uses (the subject of current work by the G axis Task Force : a) the “confidence in estimate” use where G1, G2, G3 are respectively high confidence (low uncertainty), moderate confidence (moderate uncertainty), low confidence (high uncertainty); b) the “position in uncertainty range” use where G1, G1+G2, G1+G2+G3 are respectively low (or P90) case, mid/best case (or P50) and high case (or P10) and G2, G3 are respectively incremental to the low case and best case. Note that UNFC uses are different convention for the meaning of P10, P50 and P90 for the one quoted. This should be made clear in the text and in table. Note also that, in the “position in uncertainty range” use, UNFC allows either deterministic or probabilistic estimates. This should be mentioned.
5. Similarly, paragraph 4 on p22 is incorrect. Table 5 subcategories of G4 are also incorrect. G4.2 and G4.3 are incremental. G4.1+G4.2 is the mid/best (or P50) case and G4.1+G4.2+G4.3 (or P10) is the high case. Again, the alternative of deterministic rather than probabilistic use should be included.
6. Table 5 is very confusing. Some issues have been flagged under points 4 and 5 above. In addition G1+G2 is explained as “Product quantity – best case.” This is consistent with “position in uncertainty range” use, but then explained as “Preliminary studies...”. Again this is mixing 2 different uses of the G axis. Similarly, for G1+G2+G3 which is defined as “Product quantity – high case.” Then inconsistently explained as “Very preliminary studies”. Instead of table 5 (which is different from the UNFC G axis table), the G axis table from UNFC should be shown with an additional column to give the additional groundwater text.

Kind regards,

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