

17 January 2024

Dear EGRM Groundwater Resources Working Group,

RE: Draft United Nations Framework Classification for Resources (UNFC), Supplemental Groundwater Specifications

As the authors of the Supplementary Specifications for the application of the United Nations Framework Classification for Resources (Update 2019) to Geothermal Energy Resources, we welcome the opportunity to comment on the Groundwater Resources specifications.

While we support consideration for inclusion of groundwater resources under the umbrella of the UNFC, given the critical role they play towards a sustainable future, we believe that the current draft requires further elaboration and broader sector consultation prior to publication.

Please find attached our comments and recommendations.

We remain available for any questions you may have and offer our assistance with cross-sectoral (geothermal-groundwater) aspects.

Yours sincerely,

EGRM Geothermal Energy Sub-Group

Gioia Falcone (University of Glasgow)

Harmen Mijnlief (Geological Survey of The Netherlands)

Annamaria Nador (Geological & Geophysical Institute, Hungary)

Paolo Conti (University of Pisa)

Sulamith Kastl (BGR)

Chris Schiffler (Technical University of Munich)

Greg Ussher (Jacobs)

Graeme Beardsmore (International Geothermal Association)