

Thank you for the opportunity to comment on mineral exploration and development in the Yukon.

I understand the attraction short term economic benefits from mining exploration and development may have in the Yukon, especially in terms of employment and income for Yukoners. I am very concerned that the wider and longer term implications have proven to be a net loss to the territory. This stems primarily from the costs of current and potential remediation for abandoned mines or bailing out ailing concerns. As far as I understand mining in the Yukon is historically a direct cost to tax-payers and thus cannot be supported.

A comprehensive and full-life economic assessment of all aspects of mining needs to be produced and presented to allow for informed decision making. Subsequently, allow YESAB to consider budgets and local expenditures when considering submissions for mining projects. This way, the amount of financial benefit can be weighed against the environmental and social costs; adverse impacts assessed against the local and territorial benefits. Surely this is the way the environmental and socio-economic body was intended to operate.

One option to help mitigate cases when the territory is left with the costs of remediation is to ensure that appropriate bonds are required for all mining projects. A bond equal the value of the project should be provided before a company is given approval to proceed. If a company is unable to provide these guarantees then it is in no position to be given access. While this may deter some companies from investing or undertaking projects, it is surely fiscally more responsible than dealing with the cases we're currently embroiled in. The system seems to work far better in the NWT than here and particularly well in the Inuvialuit Settlement Region. Alternately, make company directors personally liable for unexpected remediation costs. Often company profits are siphoned to directors and shareholders with insufficient monies left in the budget for necessary works.

I can think of few cases where the promoter of a sector is also the regulator and enforcement agency. It is ludicrous that this is how mineral development is managed in the territory. Regulations and enforcement must be independent from promotion to avoid the clear conflict of interests. This would be an obvious first step. In addition;

- Mining acts and regulations are incredibly outdated and conflicted and must be fully reviewed to reflect how society, governments and the industry operate today. Much has changed over the past 100 years, but there is no apparent appetite to resolve this from the Yukon Government.
- And while on the topic of 'no government appetite', it is absurd that royalty levels for placer mining have remained unchanged for so long. Minerals belong to the Yukon (at least while in the ground) yet the government gets little financial benefit from extraction. Raising placer and hard rock royalties will not hinder mining; particularly with gold prices at record high levels with no sign of falling.
- More direction and resources are needed for enforcement. In my experience, enforcement is poor and cases of non-compliance often waived. This seems to be an administrative decision as much as a financial one. Cases exist where there are no clear boundaries in terms of who is responsible for enforcement which has led to infractions not being dealt with – particularly within communities.

- Recommendations made by YESAB are more often than not rejected or altered by Decision Bodies within EMR. More resources should be given to reducing perceived conflicts and to allow positive changes to regulations and practices to be encouraged and introduced. YESAB must be given authority to set mandatory conditions; it being the only fully independent assessment body in the process.
- Miners invariably get support from EMR, yet residents have no territorial body to turn to. With powers under the Municipal Act, Community Services should be considered a Decision Body for mining projects in communities, to support residents. Decisions on mining activity within municipal boundaries and communities must always be the remit of the municipal government. It must be made clear that a municipality has the authority to reject mining if it does not comply with local policy and regulations – irrespective of EMR or Water Board approvals.
- The historic approval of mining licences effectively allows for mining in perpetuity. Mines change hands with little consideration of whether continuing activity remains in the public interest. More consideration must be given to the wider and cumulative impacts of allowing activities to continue with no end date in sight. Equally, remediation is notoriously poor, especially in the placer industry. With no long-term end to consider, there are few incentives for miners to preserve the land in a condition to allow for restoration, nor to retain the means to do so. Why go to the bother of maintaining a site, when you can sell or transfer it without having to do so?

Regional land use planning is the cornerstone of land use in the territory. Any decisions regarding mineral development in a region, where planning is ongoing or proposed, must be put on hold until the regional plan is complete. Experience has shown mining's knee-jerk reaction to usurp the planning process – the case of the thousands of claims staked in the Peel region when regional planning was announced is one obvious example. Proper and considerate planning cannot take place when 'claims' for ownership are allowed to pre-empt decision making. This may delay mineral exploration, but only in the short term, and is the only way to ensure the enshrined process is fair and equal.

It is equally important that the full climate change and environmental impacts of mineral development are considered in decision making. Mining is fuel-heavy, uses substantial amounts of energy and has a considerable impact on resource use and emissions within the territory. A full industry audit would help assess impacts, while project-based calculations can form part of a cumulative impacts appraisal. Similarly, cumulative impacts of developments per se never seem to be properly assessed, even within YESAB. This is an area that requires considerable improvement if we are to accurately assess collective adverse effects.

The question on the online survey asks "What is THE ONE THING you would never want to lose about the Yukon?" Our territory contains much of the last true wilderness left on the planet. It is unique and at risk. Once it is gone, experience shows it is almost impossible to bring it back. Short or medium term financial gain (if there ultimately proves to be any) can never compensate for losing what the vast majority of Yukoners hold dearest.

Regards, Jim Taggart.