

Submission to the Yukon Mineral Development Strategy

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Date: August 28, 2020

We recognize the significant role that mining has played in Yukon's evolution. We also accept that mining and its commodities are essential to our lives and our economic well-being. We support mining development in Yukon.

We are encouraged that recent years have seen mining companies conclude benefit agreements with First Nations.

We are not miners nor do we profess any specialized knowledge about mining. However, we have lived in Yukon for more than forty-five years and recognize that over that period of time a number of issues have emerged that Yukon, its government and citizens need to address:

1. All too often Yukon mines have made headlines for the wrong reasons: going into receivership leaving the taxpayer with the responsibility for remediation; failures on the part of first federal, now territorial, governments to secure sufficient security is set aside from the outset of a mine's development to address mine closures and clean-up; mines whose effluent escapes containment and flows into streams and rivers, spreading contaminants; and mines where safety procedures have been lax, resulting in death or injury.
2. Any mineral development strategy must recognize that the health and safety of Yukon's waterways are of paramount importance and override other considerations. Safeguards must be clearly established to safeguard this most precious resource. Where mines and mining operators fail in their responsibility to protect our water, they must be held responsible to the full extent of the law.
3. Free staking: there must be limits imposed on the practice of free mineral claim staking in order, for example, to avoid egregious claims in municipal areas (such as that which occurred in the Spruce Hills area of Whitehorse) and on or adjacent to public roads (such as in Dawson City's Midnight Dome area).
4. Royalty payments: following a gold royalty regime established in 1908 - when gold was worth \$18.95 US - is absurd and amounts to a giveaway of a publicly owned, non-renewable resource when an ounce of gold in late August, 2020, sells for \$1972.00 US. It is imperative that this be adjusted to reflect that increase in value. To that end, the recommendations put forward by the Yukon Conservation Society (YCS), basing the gold royalty "on a percentage of the market price of the commodity", would lead to a more realistic valuation and return for that resource.
5. All too often mining development in Yukon has resulted in profits flowing to company shareholders, leaving Yukoners with comparatively little in return for the loss of their non-renewable resources.
6. With regard to mine closures, again the soundness of YCS's position is confirmed by a sorry history of malpractice in Yukon. In particular, "mineral legislation should include a requirement for any mineral exploration or development plan to identify progressive reclamation of exploration sites and/or the means by which a developed mine may be closed, subject to later monitoring. Any mineral development proposal that does not include a full and final closure plan with costing and fund security should not be allowed to proceed. [These]... need to include a risk assessment of cost increases and assured funding availability." YCS's final recommendation, promoting the creation of a single,

independent body “with knowledgeable people ...to oversee the funds and operations of a mine closure plan”, would be a sensible and responsible method of ensuring compliance.

We trust that the outcome of the Mineral Development Strategy will result in improved mining legislation that benefits all stakeholders, protects Yukon’s waterways and leads to reclamation of developed mine sites.

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