

From: Heather Swystun hswystun@gmail.com
Subject: Future of Mineral Development in the Yukon
Date: September 5, 2020 at 4:18 PM
To: panel@yukonmds.com

HS

Yukon Mineral Development Strategy Panel,

To the Mineral Development Strategy Panel,

I agree that all these points should be considered in the Yukon Mineral Development Strategy:

Before decisions about transformative mining projects are made, land use planning should be completed. Without land use plans, environmental reviews are not equipped to consider the cumulative effects of major roads and hardrock mines and how these may jeopardize the values of Yukoners and First Nations.

Pause mineral staking in areas where land use planning is underway. Otherwise, areas of ecological and cultural importance could be staked and mined before they can be protected through planning.

Mining promotion, regulation, and enforcement must be separated within Yukon Government to ensure regulators have a clear mandate to protect people and the environment. Responsibility for project approval should shift from the Department of Energy, Mines and Resources to an arms-length Development Assessment branch. An independent agency could enforce mining regulations.

Mining activities must align with Yukon's commitments to climate action and biodiversity conservation, including Our Clean Future, Yukon's strategy for mitigating climate change through clean energy and a green economy.

The outdated Quartz and Placer mining acts must be overhauled. New legislation should reflect modern treaties, the scale and intensity of modern mining, and mining's effects on communities and ecosystems.

Integrate the four-step, globally implemented "Mitigation Hierarchy" into project assessments to ensure mining projects leave a positive legacy. The first two steps, "avoid harm" and "minimize harm", should be emphasized over the last steps, "restore what is damaged" and "offset what is lost".

Gross Domestic Product (GDP) fails to provide a comprehensive and accurate picture of mining's economic contribution to the territory. At minimum, Yukon Government should analyze the revenue that actually stays in the Yukon, as well as costs of management, remediation, promotion, and subsidization of infrastructure like mining roads. Benefits must exceed the costs.

Reclamation must be part of the cost of development and the burden must be on the developer. Total Cost Accounting should be used.

Thank you for considering these points,

Heather Swystun

Heather Swystun,
Whitehorse

