

## **Yukon Prospectors Association (YPA)**

### **To: Yukon Mineral Development Strategy (YMDS) Panel**

Thank you for allowing the Yukon Prospectors Association (YPA) to provide a submission to the YMDS panel.

Issues affecting the Yukon prospecting and exploration community may be summed up in three main points:

- Lack of meaningful consultation with all levels of government, including First Nation governments.
- Increasingly complex and lengthy regulatory regimes, particularly for Class 1 exploration.
- Challenges to the “Free Entry” system of mineral rights acquisition, which would deter responsible exploration.

When considering recommendations on how mineral exploration and mine development should be regulated into the future, and responsible procedures encouraged, the processes and procedures allowed and utilized in the past should be considered by the Panel.

More discussions among stakeholders, including Industry, should have been facilitated. As the primary exploration season extends into September and October, the YMDS Panel should allow and hear submissions provided in October and November. Further discussions including Industry, First Nations and stakeholders should be facilitated in the future.

Industry should have been and should be involved in discussions with all levels of government where issues affecting Yukon’s mining industry are being evaluated and decisions made. Government officials have conceded, incorrectly, that Industry consultation with First Nations at the MMOU Table industry has been considered premature for years, since the MOU was signed. There has only been occasional meetings and preliminary discussions with The First Nations and some leadership. Therefore, decisions that discourage industry have been made without meaningful consultation with industry representatives.

Meaningful participation should be mandatory when discussing changes.

Also discouraging, and resulting in reduced exploration, investment and staking, are the unexpected interpretative bulletins, informational bulletins and “interim approaches”, and varying interpretations and arbitrary changes of Yukon’s mining legislation by its Mining Districts. Not allowing mining in mostly frozen bogs, except for top few feet in the summer is not justifiable. Other types of wetlands and thawed ground become a much more productive habitat for plants, trees, animals, fish and birds.

Another disincentive is the Class 1 Notification requirements (really de-facto permits, that require at least a 25-day delay in low impact exploration during the short exploration season) that do not even allow prospectors to drive and camp on claims. This is not required by the courts, and was to be corrected. These need to be corrected in new policies and procedures ASAP!

These processes and procedures for changing the regulations governing mineral exploration should be considered with the eye of improving them - to ensure full consideration by all of the changes being contemplated.

The right to access the land and using low impact/trivial and transient techniques to prospect (and to harvest, hike, camp, travel over and explore in general) should be assured. It has been deemed to be allowed in court rulings.

Mineral rights granted through "free-entry" claim staking provide incentive to prospectors to find and establish mineralized bodies that may lead to mine development. Free entry must be maintained, and a maximum amount of land should remain open for all types of exploration. Low impact mineral exploration should be accorded the same rights as all other types of low-impact exploration, such as biological studies, and enjoyment of exploring rivers, streams, lakes and mountains.

Wilderness and wildlife can thrive in and around areas that are being mined and have been mined. The evidence is there. For example, ponds and shallow water wetlands created through placer mining have resulted in increased bird, animal and fish populations, and have facilitated biodiversity. All stakeholders should be informed and provided with evidence of this.

The online and phone meetings/discussions being held in August and September have been useful as these have provided opportunities for all sides to make their points and to find common ground that would allow responsible mineral exploration and land use to continue.

Any recommendations, as the Panel develops them, should be made in full consultation with us all, so as to facilitate consensus – as we are all in this together.

Thank you,

Grant Allan  
President, Yukon Prospectors Association