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Mineral Development Strategy
108 Elliott Street, P.O. Box 372
Whitehorse, YT
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Attn: Yukon Mineral Development Strategy Panel,

Our company has been established in Dawson City for nearly half a century, and over that period we have experienced and have learned to appreciate the mining industry's invaluable role as a major socio-economic factor sustaining Yukon.

The fate of a single industry is not as critical to the well-being of large urban communities, sustained as they tend to be by a multitude of diverse industries. Dawson City's well-being is wholly dependent on three industries: tourism, government, and above all else the mining industry. Dawson City was forged and built by placer mining and to this date mining is the one industry on which many if not most local secondary industries and businesses rely.

For well over a century mining has provided the economic consistency which enabled other industries, not the least being tourism, to grow, expand, and flourish. The COVID-19 pandemic, however, has had a devastating impact on our economy, having effectively strangled two-thirds of our economy. The pandemic has provided incontrovertible evidence of the tourism industry's fragility. In addition to the collapse of the visitor segment of the hospitality industry, government related travel, a not insignificant share of the travel business, all but collapsed as well. If it were not for the Placer Mining industry business and government support programs, we would have closed our hotel this year.

As to the mining industry, I had the privilege of representing the Klondike constituency in the Yukon Legislative Assembly when governmental control over mining was transferred by the Federal government to Yukoners. The *Quartz Mining Act* and the *Placer Mining Act* were not voluntarily "mirrored" as the time of devolution of responsibility as one may come to assume on reading Discussion Paper Issue No. 5. That devolution was conditional on these two Acts being mirrored and adopted by the Yukon Legislature.

The intent of the *Placer Mining Act* as enacted is appropriately reflected in section 17(1) which authorizes "any individual eighteen years or over" to "enter for mining purposes, locate, prospect, and mine for gold and other precious minerals or stones on any lands in the Yukon." While regulations are essential to the implementation of any legislation, the 86 Orders in Council

now appended to the *Placer Mining Act*, with the inevitable boards and administrative apparatus arising as a consequence, are severely distorting the legislation's original intent.

The two provisions listed in the Discussion Paper under Issue No. 3, whether "the requirement to physically stake a mining claim" and "the free entry staking system" should be replaced or modified are misleading the reader. It is not the legislation that is in need of review, it is the regulations.

What the industry does need – what our community and the businesses it serves need – is a review of the regulations with an aim to remove any bureaucratic barrier obstructing the legislation's intent. For example, it is imperative that the requirement to physically stake mining claims be retained, as should the free entry staking system. Modification to either one of these long-established practices would have detrimental consequences for the hospitality industry alone. It may be convenient and technologically feasible to stake a claim in the Klondike with great accuracy from a computer located in New York or Hong Kong, but to the local business community – hotels, restaurants, retail stores, service stations, taxis, etc. etc. – these requirements are essential.

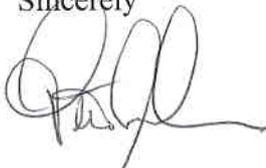
Communities and their businesses would also benefit from a strategy to embody means "dulling" mineral market extremes, measures to dampen the boom-and-bust cycles (as shown on the chart for Issue No. 1) by doing what we can to suppress peaks, while also providing what assistance we can to bridge gullies.

The subject of Royalty Distribution (Issue No. 4) is a politically sensitive one. Viewed from an inter-governmental rather than intra-government perspective, perhaps, always allowing for prudent restrictions to facilitate judicious spending decisions, a share of royalties ought to be allocated directly to local governments located in the general vicinity of mineral activities.

As it concerns Climate Change Adaptation, Issue No. 7, this is one area where we, Yukoners, ought to be prepared and willing to go our own way if national standards or global industry standards were such as to put our communities' sustainability at risk over the long-term (with emphasis on long).

It is our hope and expectation that Mineral Development Strategy emerging from this process will make a significant contribution to the reconciliation with Yukon First Nations people.

Sincerely



Peter Jenkins
Eldorado Hotel