

Yukon Mineral Development Strategy
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To: Math'ieya Alatini, Doug Eaton, Angus Robertson (YMDS Panel)

Thank you for serving on this most important panel as we in Yukon look at reviewing the Yukon's Mineral Development Strategy. Herewith we present our perspective on the development of this strategy.

To begin, the Yukon's mining legislation must definitely be updated. Both the Quartz and Placer Mining Acts are woefully out of date. These were enacted at a time when there was little understanding of land use conflict, and the governments of the day had little awareness of traditional First Nations land use. The Yukon was seen by many as "a new frontier" with unlimited resources. Although the Yukon still does lack diversity in economic drivers, tourism and the potential of future tourism cannot be ignored, notwithstanding disruption by world events such as the current new coronavirus pandemic which has limited tourism throughout 2020. You will have heard from the Yukon Salmon Sub-Committee on the importance of maintaining viable spawning and rearing habitat for one of our most precious (hopefully sustainable) resources. In addition, the realization of considerable climate change effects must be factored in to drafting new legislation.

Also paramount for consideration are appropriate timelines for further land use planning by region. It would certainly be better to have had land use plans for all regions of Yukon developed by this point and it is regrettable that one plan, the Peel Watershed, has taken so long to finalize. We believe that the challenges that arose in this process had an effect on the timeliness of other regions' planning. Nevertheless, regional land use planning will need to occur, and these plans would be better informed by carefully crafted legislation that takes the 'place-based' approach. In the interim, it will be necessary to conduct sub-regional planning, with sub-regional environmental assessments in the absence of a regional land use plan, recognizing that these can be a drain on resources and result in duplication. We strongly believe that a completed regional land use plan prior to making decisions on any "transformative" development is essential. ie. major projects.

Mineral staking should be paused during land use planning. Any government would be setting itself up for failure to allow staking while the use of said land was being debated. This is common practice and only seems reasonable to prevent future liability for claims that cannot ever be realized.

Yukon Government should separate mining promotion, regulation, and enforcement. There is irreconcilable conflict when Energy, Mines and Resources is both promoter and regulator.

Any new legislation must fulfill commitments to climate change action and to biodiversity conservation, as well as to Umbrella Final Agreement legislation.

The term “best practices” is casually used in promoting projects to allay fears of environmental degradation. In our experience, “best practices” need a whole lot of improvement! The Centre for Northern Innovation in Mining is a resource which, in addition to offering classic mine training courses, offers research via the YukonU Research Centre. This link should be promoted and augmented to provide better practices for not only the Yukon, but other jurisdictions which would benefit from our research.

Our submission speaks in generalities and we recognize that there is a lot of hard work to be done in developing specific mineral development strategies. Mining is an important industry in that we all use and require the products of mining. The strategies developed will hopefully guide us to more sustainable mining practices and sustainable development in Yukon. If the Yukon Government can act with a principled approach in drafting new mining strategies, this would go a long way to ensuring that future generations of humans and our co-species can survive and thrive.

Respectfully,
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