**INITIATIVE: Annual Work Requirement**

The Ministry is considering amending the annual work requirement including:

* Increasing the annual work requirement, in one step; or
* Increasing the annual work requirement on an incremental basis with the length of the claim. For example, if the work requirement is $400, after the first two years, the third assessment year work requirement would increase to $600, and the fourth year it could increase to $800;
* The Ministry could provide a different work requirement for exploration work conducted in remote locations.

What we would like to hear from you:

* Is the current annual work requirement sufficient to ensure exploration work is undertaken, or should it be increased? If it were to be increased, what impacts would you foresee for the industry?
* What do you consider to be a reasonable annual work requirement to keep a claim in good standing?

**Ring of Fire Metals / Wyloo:**

**Increasing rates will not have a perceptible impact on mineral exploration by proponents that can afford higher end exploration activities like drilling. It will penalize prospectors and other proponents who wish to perform systematic ground-based work such as mapping, prospecting and sampling. Thus an increase would likely punish the smaller companies and prospectors who have difficulty raising money already. We are trying to attract companies to the Province.**

**We don’t believe there should be an incremental increase year over year ($400 the first requirement, $600 the second, etc.). This just adds unnecessary complexity to annual work requirements and makes it difficult to manage and forecast work needed especially with large claim packages. We applaud the relative simplicity of Ontario’s renewal system now.**

**The ministry should definitely not provide a different work requirement for remote work. How would you define remote? Much of the Province could be considered remote in some sense. The Ministry would need to define i) distances from road networks or major population centres: What would a major population centre be? What would the distance be?; ii) anything inaccessible or not easily accessible by road? What kind of road? What if you could access by boat but not road?; iii) anything requiring a helicopter or a minimum $/day contract?. This is a non-exhaustive list but there are far too many factors to consider here and defining a project as remote would be far too difficult to implement and maintain, and would add unnecessary complexity to the system when we are trying to simplify it. This would undoubtedly require far more effort by MINES than is currently afforded and their efforts should be focused on other matters. Remote work is inherently expensive and comes with its built in credit reward despite more cost.**

**INITIATIVE: Grass Roots Prospecting Double Credit Incentive**

**INITIATIVE: Daily Rate/Sweat Equity**

**Ring of Fire Metals / Wyloo:**

**These do not affect us and so we are not in a position to provide an opinion.**

**INITIATIVE: Credits in Reserve**

The Ministry is considering making changes to the credit in reserve process including:

* Maintaining the status quo with credits in reserve
* Establishing new parameters on when claim holders can assign credit from one mining claim to another.

What we would like to hear from you:

* Are there any other options that would increase the amount of work conducted for mineral exploration on mining claims?
* What impact would this have on your operations or the sector as a whole if the Ministry made changes to the credits in reserve process?
* What parameters would you consider appropriate to put on credits in reserve?
* Should credits in reserve be reduced by a set percentage after a certain period of time if they are unused (e.g., after 5 years)?
* Are there any alternative approaches the Ministry should consider to reduce the amount of unpatented mining claims that are held for long periods of time without exploration?

**Ring of Fire Metals / Wyloo:**

**We would prefer to maintain the status quo with credits in reserve. Especially since we continue to explore and add to the provincial geological record annually.**

**With respect to establishing new parameters on when claim holders can assign credit: adding a timeframe is difficult to initiate but in other jurisdictions (New Brunswick, Newfoundland), it does force exploration companies to do work within a given timeframe – e.g., the establishment of a requirement that every 10 years new work must be done on the claims. If new work is done within the 10 years, the clock is reset. If it is not done, then the claim bank or a portion of it is removed. This would force companies to do work but MINES would need to guarantee that the claims will be open at all times to assure them that they can do work – e.g. if an exploration permit forces the claim on hold then this 10 year period would also be put on pause. Could MINES guarantee that permits will be timely? What about if the markets are bad in certain years and companies would like to work but can’t? Do we penalize them?**

**We strongly oppose the re-setting of the claim bank every X number of years (e.g. as done in Newfoundland).**

**Something else to consider is that some claim holders not working a specific set of claims may not be idle elsewhere. They may be focused on another property in the province and may not have the capability nor funding to work their other property.**

* Are there any other options that would increase the amount of work conducted for mineral exploration on mining claims?

**Other options that might increase the amount of work conducted is to allow re-evaluating exploration properties through historic data compilation or re-surveying, re-logging, re-mapping. This adds new data to the provincial geological record. This would require the application of new thresholds and would need to be monitored so that companies don’t just “re-evaluate the data” every year. E.g. it could only be applicable every 5 years or if a new company has bought the claims – and could only happen once on a given property or for a given commodity. Companies that perform this type of work are generally expanding upon previously collected data and instead of expending dollars drilling a new hole, are examining old core to re-evaluate the prospectivity. This has proven invaluable for Wyloo and at least one discovery has been made this way. If these activities are allowable then it is more incentive to do this kind of work.**

**Perhaps adding a distance buffer for spreading credits is another avenue (similar to Quebec). If implemented, it should be much larger than 4.5km given the size and scope of work project in Ontario. It should only be done to limit spreading credits across vast distances (say >100km) as that defeats the purpose. This would require grandfathering for companies like ourselves who staked claim blocks under the current standards. If a distance buffer were put into place tomorrow we would lose a lot of claims quickly.**

**But, forcing claim holders to work the claims by raising credit limits or limiting their use may not encourage new work. If a company is forced to drop their claims and another picks it up, they may do a bare minimum or may do nothing at all.**

* What impact would this have on your operations or the sector as a whole if the Ministry made changes to the credits in reserve process?

**This would force early property reduction due to the adjustment of the internal tenure management priorities. Wyloo expends significant exploration dollars annually, and claim blocks are staked on the assumption that all can be renewed through the credit reserve and claim contiguity if no work is performed on them. Market and internal commodity or project priorities force changes to where we explore and the priority isn’t on every claim block. We rely on the current system to allow us flexibility in where we explore.**

* What parameters would you consider appropriate to put on credits in reserve?

**No additional parameters aside from the 10 year process discussed above.**

* Should credits in reserve be reduced by a set percentage after a certain period of time if they are unused (e.g., after 5 years)?

**This should not be done and would be most damaging to the small companies and prospectors. You should not penalize companies for having done the work.**

* Are there any alternative approaches the Ministry should consider to reduce the amount of unpatented mining claims that are held for long periods of time without exploration?

**This supposes that the claimholder is only engaged with a single property and is ignoring others rather than managing it in a plan.**

**INITIATIVE: Increasing work types, geoscience data and related expenses eligible for assessment work credits**

The Ministry has heard from industry that there is an interest in expanding the types of work eligible for assessment work credit, to reflect technological innovation and to better reflect the true cost of working on claims that are challenging to access because of geography and/or topography. The Ministry is considering expanding the list of eligible work types and related expenses available for assessment credit. Examples include:

1. Utilization of technology such as artificial intelligence (“AI”) to provide new geoscientific analyses of data.

• What criteria should be established if the Ministry were to accept AI for assessment work credit?

**Ring of Fire Metals / Wyloo:**

**An AI system needs existing data with specific sets of criteria built in to help build a database. A database built for Australia would not necessarily be useful in Canada. If AI is chosen as a new type of credit it would require an existing set of exploration data – e.g. perhaps if you file a geophysical survey you could also file an AI report that has picked targets for you.**

2. Providing criteria for the acceptance of assays conducted on previously submitted samples for assessment work.

• What criteria should be established for accepting assay results on samples that have previously received assessment work credits? What limitations, if any, should there be?

**Ring of Fire Metals / Wyloo:**

**Fairly certain re-assaying is allowed already? Re-assaying should be allowed for new credits provided that:**

* **They are analyzing for elements or methods not previously analyzed for**
* **Are submitted X number of years after the first set of samples, and are using an updated/new analytical technique that may be more accurate & precise**
* **They are using a new lab**

3. Allowing eligibility of overflight beyond registered claim boundaries for geophysical survey flights following the establishment of clear parameters for flight paths.

• What would be acceptable business reasons that would warrant requiring overflight for assessment work credit?

• What parameters should be established to allow overflight to be eligible for assessment work credits?

• At what distance should the maximum percentage of overfly be granted assessment work credits?

• What types of overfly should be accepted for credits? Should there be different criteria for each type?

**Ring of Fire Metals / Wyloo:**

**Costs for overflight should only be eligible on existing claims – however, small overflights (200-500m depending on vehicle type) for turn-around should also be eligible to be included on the nearest claim as that is the cost of the survey.**

4. Accepting raw datasets from geophysical surveys to provide detailed geophysical data for Ontario’s database.

• Should the acceptance of raw datasets be mandatory?

• Should raw datasets be eligible for extra credit as an alternative to being a mandatory requirement?

**Ring of Fire Metals / Wyloo:**

**It is difficult to make the submission of data mandatory. Companies spend many thousands and millions of dollars collecting this data and if it is then freely available to anyone, those third parties have spent nothing to obtain the same data. This is unfair to the primary collector and may cause under-reporting or non-compliance. It also does not promote spending exploration dollars as some companies may just wait until a dataset is released.**

**Alternatively, we feel as though it is beneficial to third parties to have data available to them similar as to what they would obtain through other avenues (assessment report library, public datasets, etc). Assessment reports have maps in them, and these are often geo-rectified by other geologists for examination anyways. It would be more efficient to have the raw data grid available rather than having to rectify it – the map has already been released to the public so why not make it easier by providing the grid file? Certain pieces of the raw data should not be mandatory – such as the raw database, as this is not in the assessment reports and contains the data from which everything is built.**

**As an alternative to making it mandatory, we support the raw datasets being eligible for extra credit.**

5. Accepting costs for the mobilization and demobilization conducted out of Province.

• What costs for mobilization out of province should be considered for assessment work?

• Which jurisdictions outside of Ontario should be considered eligible for assessment work credit?

**Ring of Fire Metals / Wyloo:**

**If a company/contractor/etc is being mobilized to Ontario then the costs from any jurisdiction should be eligible. This should be limited to anywhere in Canada only.**

Additional Questions:

* Are there any other work types and related expenses the Ministry should consider eligible for assessment credit?
* Should any additional work types and related expenses have associated eligibility criteria?
* If yes, what should the eligibility criteria include?
* Please provide any thoughts on the potential expanded list of eligible work types and related expenses above.

**Ring of Fire Metals / Wyloo:**

**Costs relating to species at risk mitigation plans should be eligible as these are required for all exploration companies.**

**Drone-borne geophysical surveys should also be eligible.**

**INITIATIVE: Proof of Work/ Expense Verification**

The Ministry is considering options for changing the proof of work/expense verification requirement including:

* Maintaining the requirement that claim holders provide receipts and/or invoices for the direct costs of performing prescribed work types; however, for some types of associated indirect costs where receipting is often difficult to obtain in the field (food and lodging, travel, some administrative costs associated with Aboriginal consultation), claim holders could self-report costs.

**Ring of Fire Metals / Wyloo:**

**We agree that the process can be a burden and time-consuming however we agree that the Ministry should still require receipts/invoices for direct costs of performing prescribed work types. We believe that providing receipts for associated/indirect costs is the most burdensome (food, lodging, travel, etc) and should be self-reported with no requirement to provide receipts. Often, these associated costs are split between multiple projects and assessment reports, and so the costs reported are often less than what is seen in the receipt – and thus it’s difficult for the Ministry to even rectify these costs anyways.**

* Removing the requirement that claim holders provide any receipts and/or invoices for work types and related expenses to the Ministry. Instead, claim holders would submit a report of expenditures to the Ministry that would be evaluated based on current Ontario industry standard rates, and would have the discretion to request a receipt as needed.

**Ring of Fire Metals / Wyloo:**

**This could tie into the above point – that the Ministry should require receipts for direct costs but should only request receipts for indirect costs on an as-needed basis. With each assessment report we already provide an expenditure report with multiple tables.**

**INITIATIVE: Service Standards and Reporting Processes**

Ontario has committed to cutting red tape and reducing burden in the mining sector to attract global investment, expand the industry, and create new jobs. The Ministry has heard that clients would like a clear service standard for when claim holders will receive a response from the Ministry (e.g., when finalizing a work report submission after a notice of determination period).

The Ministry is proposing changes to modernize the framework for keeping claims in good standing, increase the efficiency of Ontario’s regulatory approval processes, and reduce administrative burden for the mineral exploration sector.

What we would like to hear from you:

* What are reasonable timelines for proponents to wait before the Ministry responds after the 45-day notice of determination?
* Are there any other service standards that would benefit industry?

In addition, the Ministry would like to know if there are any additional changes that could be implemented to assist in the reporting process:

What we would like to hear from you:

* What administrative and reporting processes related to assessment work undertaken by the Ministry do you find burdensome?
* What changes would you recommend the Ministry consider to reduce burden with respect to the reporting process for assessment work?

**Ring of Fire Metals / Wyloo:**

**The amount of time taken to review and accept an assessment report is often quite variable. Some take 6 months, some take 4 weeks. It would be beneficial to have a standard for when these are reviewed and returned/accepted or given a 45-day notice.**

**It also takes a significant – and unknown – amount of time before a report is added to the assessment library available to the public. Accepted reports should be added within 1 month of acceptance so that the public has access to what competitors are doing. Right now it can take a year or more unless you specifically request it.**

**The system for monitoring within MLAS should be improved. See point below.**

**INITIATIVE: Submittable Templates for Assessment Work and Guidelines**

The Ministry is considering creating templates to enhance claim holders and their contractors’ understanding of assessment work requirements (e.g., a daily log, expense reporting table, a checklist for work reporting requirements, etc.) and/or other changes to the Technical Standards.

What we would like to hear from you:

* What templates could the Ministry provide to assist in the reporting process?
* Are there any changes to the Technical Standards for Reporting Assessment Work that would assist the reporting process?

**Ring of Fire Metals / Wyloo:**

**Assessment report templates would be useful for some, and not used by others. E.g. we have our own template that works well. If a template is required, its use should be voluntary.**

**INITIATIVE: Mining Lands Administration System (MLAS) Improvements**

The Ministry is in the process of improving the Mining Lands Administrative System (MLAS), including creating an option to expand the capacity of files that can be submitted for assessment work, group claims into packages for ease of managing a property, allowing auto-completion of claim fields, improving the pending distribution function to facilitate assigning and applying credit, directly linking templates, and creating a Frequently Asked Questions list.

What we would like to hear from you:

* Are there any additional changes to MLAS that would be beneficial in the submission of assessment work?
* What changes to MLAS would you find helpful to assist your business as part of the assessment work reporting regime?

**Ring of Fire Metals / Wyloo:**

**The system for monitoring within MLAS should be improved.**

* **Currently once an assessment report is filed, you have no real way of seeing what you filed or making revisions. You should be allowed to revise before the report has been reviewed.**
* **If a 45-day notice is sent and revisions required, you should be allowed to edit the numbers in MLAS directly (currently we have to email excel files).**
* **There should be status updates (‘not yet reviewed’, ‘being reviewed’, etc.) in MLAS.**
* **MLAS should have a dedicated assessment report section (similar to claims, instruments, mining tenures). Currently, you can only search by the abstract of individual claims and this is very tedious. Plus, if you are looking for a newly-accepted third party report that is not in the library (which can take up to a year!), you can’t even tell what’s been done without going through the abstracts of thousands of claims – this is far too onerous.**

**MLAS can also be greatly improved for large data reports (i.e. allow for more than 250 claims). A recent airborne geophysical survey we filed required 10 reports for the same thing! The number of claims should not be the reason for hours of unnecessary extra effort on the client and Ministry side.**

**Non-contiguous claims and claims held by two subsidiaries of the same company should all go into a single report. We’ve had to split the same work report because some claims are held by one subsidiary of ours versus another.**

**Auto-fill would be a great help.**

**If you have a large report and 1000’s of claims, it would be helpful to allow for the import of excel/csv/txt files to facilitate easier data entry and accuracy. Currently the system gets bogged down when entering permit number, exploration, and consultation dollar expenditures on so many claims. This might be fine for small claim blocks but not for larger submissions. This should also be applied to the Distribute Accepted Credits (e.g. renewal) function in MLAS.**

**In a new FAQ section of MLAS, there should be documents pertaining to allowable work types, eligible costs, technical standards, regulatory requirements outside of MINES – everything that can be found on the Ontario MINES website (or not!). Currently these are hard to track down and find and having them centralized would eliminate a lot of headaches.**

**INITIATIVE: Resolving Issues Related to Boundary Claims and Maximizing Land Available for Mineral Exploration**

The Ministry is considering how to improve assessment work issues relating to boundary claims. Boundary claims are part, or parts of, legacy claims that are located within a single cell on the provincial grid.

What we would like to hear from you:

* Should the Ministry change their policies regarding boundary claims with respect to unavailable land within a cell?
* If so, what changes should the Ministry consider?
* How much assessment work should be required to keep a boundary claim (i.e., part or parts of legacy claims) in good standing?
* How should we resolve the issue of white space where small areas of land are unavailable for exploration, due to boundary claims, within a provincial grid cell?
* How should Ontario go about picking between boundary claim holders, if Ontario were to decide to grant white space to one of them?

**Ring of Fire Metals / Wyloo:**

**The white spaces should remain. Boundary claims will dissipate over the years. We need to maintain the white space in a cell because we have royalty agreements on our boundary claims that have to stay. If one claim is cancelled vs. another within the same cell, then we run into unwanted issues with our legal agreements. Thus we won’t be cancelling boundary claims in order to remove white space. Determining who owns the white space is too difficult to determine and thus MINES can’t really come to a fair decision.**

**INITIATIVE: General amendments including moving work types out of regulation and into policy, and removing work types that are underutilized.**

If work types are included as policies instead of in regulation, the timelines for potential amendments and updates will be shorter than if they have to undergo the required regulatory processes.

What we would like to hear from you:

* • Should the Ministry consider moving work types out of Regulation and into Policy?

•

* How regularly should work types be reviewed to reflect modern exploration practices?

**Ring of Fire Metals / Wyloo:**

**It does not matter if it’s a policy or regulation as the distinction between the two is difficult to grasp and/or may not be important to the client. Whatever invokes a shorter timeline for updates, we support. As well, everything should be documented in new proposed FAQ/document section of MLAS.**