



*Mineral Resources Act –  
Regulation Development*

## STATUS REPORT

*Loi sur les ressources minérales –  
Élaboration du règlement*

## RAPPORT D'ÉTAPE

August 2023 | août 2023



Le présent document contient la  
traduction française de la présentation.

Government of | Gouvernement des  
**Northwest Territories**  
**Territoires du Nord-Ouest**

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English

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Kīspin ki nitawihtīn ē nīhīyawihk ōma ācimōwin, tipwāsīnān.  
Cree

Tł̥chq̣ yatı k'êê. Dı wegodi newq̣ dè, gots'o gonede.  
Tł̥chq̣

ʔerihł'ís Dēne Sų́łíné yatı t'a huts'elkēr xa beyáyatı theʔą ʔat'e, nuwe ts'ēn yółtı.  
Chipewyan

Edi gondi dehgáh got'je zhatié k'éé edat'éh enahddhë nide naxets'é edahí.  
South Slavey

K'áhshó got'íne xədə k'é hederı ɬedɨhtl'é yerınıwə ní dé dúle.  
North Slavey

Jii gwandak izhii ginjik vat'atr'ijahch'uu zhit yinothan ji', diits'at ginohkhi.  
Gwich'in

Uvanittuaq ilitchurisukupku Inuvialuktun, ququaq'luta.  
Inuvialuktun

Inuktitut

Hapkua titiqqat pijumagupkit Inuinnaqtun, uvaptinnut hivajarlutit.  
Inuinnaqtun

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# Letter from Indigenous Governments of the *MRA* Regulation Technical Working Group

## INDIGENOUS GOVERNMENT PERSPECTIVES

This brief summary provides an overview of Indigenous Government (“IG”) perspectives on the legislative co-development process for the NWT Mineral Resources Act Regulations (“MRAR”).

Overall, the MRAR co-development process, which has been undertaken by a technical working group (“TWG”) comprised of members of numerous IGs and representatives of the Government of the Northwest Territories (“GNWT”), has been an effective, collegial, and collaborative process, which has resulted in the advancement of a large number of MRAR regulatory priorities. Particular credit is owed to the TWG process for its commitment to ensuring that issues only move forward when a mutually-acceptable approach has been co-developed and endorsed by all participants. Where more challenging or technically complex issues have arisen, the TWG has made effective use of outside experts and smaller and more focused sub-groups.

Timelines have been, at times, a challenge. Those time pressures were, in the view of IGs, not a function of the co-development process itself, but rather stemmed from the delays that were faced in commencing the TWG’s work following the last Territorial election. Going forward, there would be significant value in identifying transition mechanisms to ensure that work can continue through the

electoral cycle and to ensure that protracted delays do not result from a change in government. Given time pressures, the MRAR will not be completed before the end of this legislative assembly, and establishing processes so that work on the MRARs can continue uninterrupted through and after the election is essential.

While some issues required significant investments of time to identify and develop workable solutions, the trust developed at the table, and the collective commitment to ensuring the principles enshrined in the IGC Legislative Development Protocol were embraced and adhered to resulted in a very positive, multi-lateral, exercise that reflects a new, better, way in which IGs and public government can advance shared legislative priorities. Moving forward, the TWG will engage in opportunities to collaboratively work with legislative branch to help ensure broad-based support for the TWG’s work across the whole of government. Notwithstanding certain challenges, the MRAR co-development process continues to be a credit.

# Executive Summary

## INTRODUCTION

The *Mineral Resources Act (MRA)*, Bill 34, was passed by the 18<sup>th</sup> Legislative Assembly of the Northwest Territories (NWT) in 2019, marking the first step towards a made-in-the-NWT approach to governing mineral development.

Equally significant was the collaborative approach taken to its development by the NWT's territorial and Indigenous Governments, during the 18<sup>th</sup> Legislative Assembly. Collaborative work to develop the *MRA*'s regulations continues so that the *MRA* can come into force.

### The purpose of this document is to:

- Outline the collaborative process undertaken for development of the *MRA* regulations (referred to from here on as regulations);
- Communicate progress up to the end of June 2023;
- Document the engagement that has occurred and how the Government of the Northwest Territories (GNWT) and Indigenous governments are using this information to develop the regulations; and
- Explain the remaining work required to bring the *MRA* into force.



The legislative process involves the creation of an Act, followed by the development of regulations. An Act, approved by a legislative body, broadly lays out a system of rules. The regulations then provide specific details that allow the rules to be interpreted and enforced.

## BACKGROUND

### 2014-2016 Devolution

In 2014, the NWT Lands and Resources Devolution Agreement transferred responsibility for management of lands, resources, and rights in respect of water from the federal government to the GNWT.

Also in 2014, the *NWT Intergovernmental Agreement on Lands and Resources Management* (Intergovernmental Agreement) established the Intergovernmental Council (IGC) as a forum for public and Indigenous governments to cooperate and coordinate on matters related to lands and resource management, while respecting the authorities and jurisdictions of each signatory.

### 2016-2019 The NWT *Mineral Resources Act*

The IGC played a leading role in the collaborative development of the *MRA* passed, in 2019.

Between 2016 and 2019, multiple engagement sessions were held and over 500 submissions considered as IGC members, working in joint technical working groups, developed the new legislation reflecting the priorities of NWT territorial and Indigenous governments, business leaders, regulators, and citizens with modernization in mind.

Through the *MRA* process as well as other legislative initiatives that GNWT engaged in with its Devolution partners, it was recognized that a more efficient and more formalized approach could be applied for future collaborative development of lands and resources legislation.



**2020*****IGC Legislative Development Protocol***

The lessons from collaborative work between 2016 and 2019 were applied to the IGC's creation and adoption of the *IGC Legislative Development Protocol* (protocol). This ground-breaking protocol, released in December 2020, formalizes the process for the IGC to collaboratively develop or update lands and resources legislation.

**2020-2023*****MRA Regulations Development Process***

The development of *MRA* regulations began in December 2020 under the new IGC protocol but was delayed early in the process as governments and communities across Canada addressed the challenges and impacts of the global COVID-19 pandemic. Regulations development gained momentum in the Fall of 2021 as approaches to working with the IGC under the new protocol were refined.

***Technical Working Group (TWG)***

The TWG has met for more than 330 hours since February 2021 to discuss, debate and consider the regulations required to guide and enforce the application of the *MRA*.

*The TWG is committed to moving the regulations forward so that resource sector administration in the NWT can be enhanced (e.g., for Industry by moving towards on-line map staking) and completed respecting Aboriginal and treaty rights.*

**ENGAGEMENT**

Engagement has been a key aspect of the collaborative approach to regulation development. This is because input received from public and private engagements has been considered throughout the TWG decision-making process as depicted in Figure 1 on page 7.

*Note: Targeted engagement is when specific questions and/or processes are discussed with interest groups directly impacted by the change in regulations (land and environment regulators, explorers, mining companies, etc.).*

*Note: Policy Intentions are the concepts and rationale developed to guide the legal drafting of the regulations and assist with interpretation of the intent behind the regulations.*

The consensus achieved by the TWG is based on research and analysis while considering responses received during engagement activities. This is a circular process. Many engagement touchpoints have been and will be feeding into the TWG consensus-finding process before the regulations are submitted to the Minister.

**Where We are in the Regulation Development Process**

*An Overview of Policy Intentions that Will Guide the Drafting of Regulations* for the NWT Mineral Resources Act was released in December 2022.

[https://www.itl.gov.nt.ca/sites/iti/files/MRA\\_Report\\_ITI-1346\\_Web.pdf](https://www.itl.gov.nt.ca/sites/iti/files/MRA_Report_ITI-1346_Web.pdf)



*Time committed to thorough collaboration and engagement will ensure strong and supported Regulations.*

## NEXT STEPS

With this monumental task completed, the remaining steps as depicted in Figure 1 are to:

- Finalize the draft regulations;
- Post the draft regulations publicly for review;
- Provide the regulations for formal review by the IGC Secretariat; and
- Consult (as per Section 35) with Indigenous Governments on the proposed regulations.

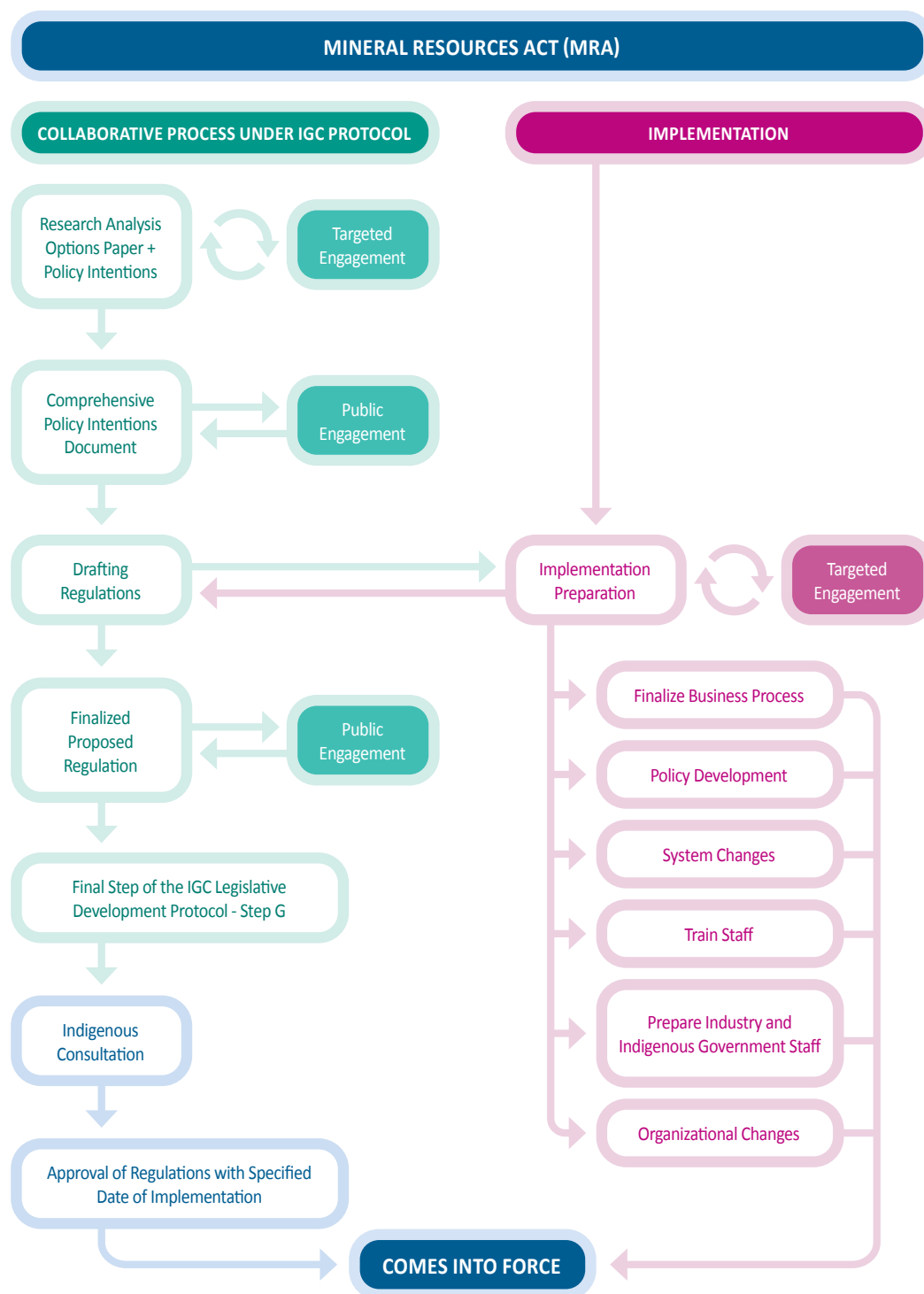
Once these steps are complete, the proposed regulations can be enacted and the *MRA* will become law. Shortly after the new regulations are in place, Online Map Staking, Zones, and Temporary Restricted Areas regulations will be released.

## IMPLEMENTATION PLANNING

The impacts of the regulations are wide-reaching and the GNWT is now planning for the implementation of the *MRA*. This includes:

- Preparing Industry and Indigenous Government staff for the changes (through an adaptive change management approach);
- Defining an organization structure to ensure efficient and effective workflow processes and client interface;
- Training GNWT staff; and
- Preparing for system changes featuring greater transparency and easier use.

**Figure 1 – The *MRA* Regulations Collaborative Engagement-Based Decision-Making Framework**





# Sommaire

## PRÉSENTATION

Le projet de loi 34, *Loi sur les ressources minérales* (LRM), a été adopté par la 18<sup>e</sup> Assemblée législative des Territoires du Nord-Ouest (TNO) en 2019. Il s'agissait de la première étape de la mise en place d'un outil de gouvernance de l'exploitation des ressources minérales entièrement ténos.

La collaboration entre le gouvernement des Territoires du Nord-Ouest et les gouvernements autochtones des TNO a été déterminante pour l'élaboration de la LRM. La 18<sup>e</sup> Assemblée législative a poursuivi le travail de collaboration dans le but d'élaborer le règlement afférent à la LRM et de permettre ainsi son entrée en vigueur.

## Le présent document a pour but :

- de décrire le processus de collaboration mis en œuvre pour l'élaboration du règlement afférent à la LRM;
- de faire état des progrès réalisés jusqu'à la fin du mois de juin 2023;
- de documenter les échanges qui ont eu lieu et la façon dont le gouvernement des Territoires du Nord-Ouest (GTNO) et les gouvernements autochtones utilisent ces informations pour élaborer le règlement;
- d'expliquer le travail qui reste à accomplir pour que la LRM puisse entrer en vigueur.



*Le processus législatif prévoit la création de lois dans un premier temps, puis la rédaction des règlements à l'appui de ces lois. Les lois approuvées par les organes législatifs établissent des ensembles de règles de nature générale, que les règlements qui les accompagnent permettent d'interpréter et d'appliquer en fournissant des détails particuliers.*

## CONTEXTE

### 2014-2016 Transfert des responsabilités

En 2014, l'*Entente sur le transfert des responsabilités liées aux terres et aux ressources des TNO* a fait passer la responsabilité de la gestion des terres, des ressources et des droits relatifs à l'eau du gouvernement fédéral au GTNO.

En 2014 également, l'*Entente intergouvernementale sur la gestion des terres et des ressources des TNO* (Entente intergouvernementale) a créé le Conseil intergouvernemental (CIG) en tant que tribune permettant aux gouvernements publics et autochtones de collaborer sur les questions liées à la gestion des terres et des ressources et de coordonner leurs efforts à cet égard, tout en respectant les pouvoirs et les compétences de chacun des signataires.

### 2016-2019 *Loi sur les ressources minérales des TNO*

Le CIG a joué un rôle de premier plan dans les travaux concertés qui ont mené à l'adoption de la LRM en 2019.

Entre 2016 et 2019, de multiples échanges avec le public ont été tenus et plus de 500 documents ont été examinés pendant que les membres du CIG, œuvrant au sein de groupes de travail techniques mixtes, ont élaboré, dans un esprit de modernisation, la nouvelle loi en tenant compte des priorités des gouvernements territorial et autochtones des TNO, des chefs d'entreprise, des organismes de réglementation et des citoyens.

Dans le cadre du processus d'élaboration de la LRM et d'autres initiatives législatives menées par le GTNO avec ses partenaires de l'Entente sur le transfert des responsabilités, on a constaté qu'une approche plus efficace et plus officielle pourrait être adoptée pour l'élaboration conjointe de futurs textes législatifs sur les terres et les ressources.

## 2020

### **Protocole d'élaboration de lois du CIG**

Les enseignements tirés du travail concerté réalisé entre 2016 et 2019 ont été appliqués à la création et à l'adoption par le CIG du Protocole d'élaboration de lois du CIG. Ce protocole novateur, publié en décembre 2020, officialise le processus qui permet au CIG d'élaborer ou d'actualiser, avec la collaboration des parties intéressées, la législation relative aux terres et aux ressources.

## 2020-2023

### **Processus d'élaboration du règlement afférent à la LRM**

L'élaboration du règlement relatif à la LRM a commencé en 2020 conformément au nouveau protocole du CIG, mais a été retardée en début de processus en raison des problèmes liés à la pandémie de COVID-19 et des conséquences de celle-ci qui ont touché les gouvernements et les collectivités de tout le Canada. Le processus d'élaboration du règlement a pris sa vitesse de croisière à l'automne 2021, alors que les méthodes de travail avec le CIG prévues par le nouveau protocole ont été affinées.

### **Groupe de travail technique (GTT)**

Le GTT s'est réuni pendant plus de 330 heures depuis février 2021 pour discuter et débattre des mesures réglementaires nécessaires pour orienter et assurer l'application de la LRM.

*Le GTT s'est engagé à faire évoluer la réglementation afin d'améliorer l'administration du secteur des ressources des TNO (p. ex. pour l'industrie en adoptant le jalonnement sur carte en ligne) et de la compléter en respectant les droits ancestraux et les droits issus de traités.*

## ÉCHANGES AVEC LE PUBLIC

Les échanges avec le public ont été au cœur de l'approche concertée adoptée pour l'élaboration du règlement. En effet, les contributions reçues dans le cadre des échanges avec le public et le secteur privé ont été prises en compte tout au long du processus décisionnel du GTT, comme le montre la figure 1.

*Nota : On parle d'échanges ciblés lorsque des questions ou des processus particuliers sont discutés avec des groupes d'intérêt directement concernés par la modification réglementaire (organismes de réglementation des terres et de l'environnement, explorateurs, sociétés minières, etc.).*

*Nota : Les intentions stratégiques sont les concepts et les arguments avancés pour guider la rédaction juridique des règlements et aider à l'interprétation de l'intention sous-jacente de ceux-ci.*

Le consensus atteint par le GTT repose sur la recherche et l'analyse, tout en tenant compte des réponses reçues dans le cadre des échanges. Il s'agit d'un processus circulaire. Les sujets traités à l'occasion de nombreux échanges ont été et seront intégrés dans le processus d'atteinte d'un consensus du GTT avant que les règlements ne soient soumis au ministre.

### **Où en est le processus d'élaboration du règlement?**

Le document intitulé *Un aperçu des objectifs stratégiques qui orienteront l'élaboration d'un règlement pour la Loi sur les ressources minérales des TNO* a été publié en décembre 2022.

[https://www.iti.gov.nt.ca/sites/iti/files/MRA\\_Report\\_ITI-1346\\_Web.pdf](https://www.iti.gov.nt.ca/sites/iti/files/MRA_Report_ITI-1346_Web.pdf)



*Le temps consacré aux efforts de collaboration et de discussion permettra d'élaborer des règlements solides et bien étayés.*

## PROCHAINES ÉTAPES

Cette tâche monumentale étant accomplie, les autres étapes sont les suivantes :

- finaliser le règlement préliminaire;
- publier le règlement provisoire pour examen;
- soumettre le règlement à l'examen officiel du secrétariat du CIG;
- consulter (conformément à l'article 35) les gouvernements autochtones sur le règlement proposé.

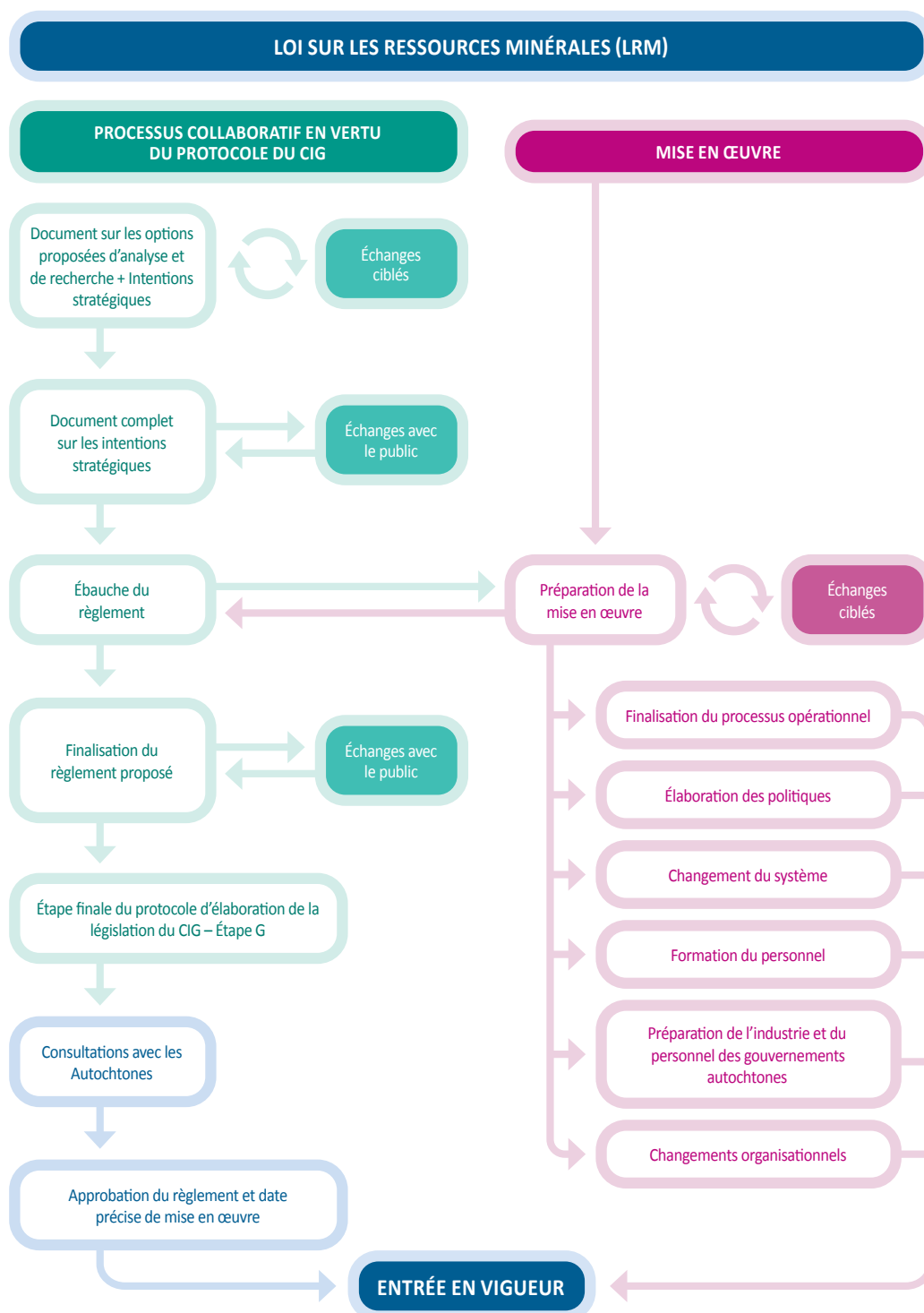
Une fois ces étapes franchies, le nouveau règlement pourra être promulgué et la LRM entrera en vigueur et aura force de loi. Peu de temps après l'entrée en vigueur du nouveau règlement, les dispositions relatives au jalonnement de cartes en ligne, aux zones et aux aires restreintes temporairement seront publiées.

## PLANIFICATION DE LA MISE EN ŒUVRE

Les effets du règlement sont considérables. Le GTNO planifie actuellement la mise en œuvre de la LRM, notamment :

- en préparant le secteur de l'industrie et le personnel des gouvernements autochtones aux changements (par une approche de gestion adaptative du changement);
- en définissant une structure organisationnelle pour garantir l'efficacité et l'efficience des processus de travail et de l'interface avec les clients;
- en formant le personnel du GTNO;
- en se préparant à des changements de système qui amèneront une plus grande transparence et qui amélioreront la convivialité.

**Figure 1 – Cadre décisionnel fondé sur les échanges relatifs au règlement afférent à la LRM**





# Introduction

The *MRA*, passed in 2019 in the Legislative Assembly of the Northwest Territories (NWT), requires regulations to bring it into force. The Government of the Northwest Territories (GNWT) and Indigenous Governments are now collaboratively drafting the regulations in accordance with the *IGC Legislative Development Protocol* (the protocol).

This status report is a companion document to the December 2022- 'An Overview of Policy Intentions that Will Guide the Drafting of Regulations for the NWT Mineral Resources Act'

[https://www.iti.gov.nt.ca/sites/iti/files/MRA\\_Report\\_ITI-1346\\_Web.pdf](https://www.iti.gov.nt.ca/sites/iti/files/MRA_Report_ITI-1346_Web.pdf)

Although an extraordinary amount of work has occurred to get to get to this point, there is still additional engagement, consultation and implementation work required.

Policy intentions are the concepts and/or rationale used to draft the legally binding regulations. The figure below outlines the major milestones that have brought us to where we are today with the majority of decisions made on the policy concepts that will inform the draft regulations.

## Major milestones in GNWT and Indigenous Government governance of exploration and mining in NWT.





The **purpose** of this document is to:

- Outline the collaborative process undertaken for development of the *MRA* regulations (referred to from here on as regulations);
- Communicate progress to date;
- Document the engagement that has occurred and how the GNWT and Indigenous Governments are using this information to develop the regulations; and
- Explain the remaining work required to bring the *MRA* into force.

To get a full picture of the *MRA* and associated regulations collaborative development process, related documents can be referred to, including, but not limited to:

- *Mineral Resources Act – What We Heard Report 2018* (located at this link along with other supporting documents)  
[https://www.iti.gov.nt.ca/sites/iti/files/mineral\\_resources\\_act\\_what\\_we\\_heard\\_key\\_elements.pdf](https://www.iti.gov.nt.ca/sites/iti/files/mineral_resources_act_what_we_heard_key_elements.pdf)
- Eight plain language fact sheets  
[Understanding the Proposed Mineral Resources Act | Industry, Tourism and Investment \(gov.nt.ca\)](#)
- *An Overview of Policy Intentions That Will Guide the Drafting of Regulations for the NWT Mineral Resources Act 2022*  
[https://www.iti.gov.nt.ca/sites/iti/files/MRA\\_Report\\_ITI-1346\\_Web.pdf](https://www.iti.gov.nt.ca/sites/iti/files/MRA_Report_ITI-1346_Web.pdf)
- *What We Heard 2022 Engagement on Resource Royalties*  
[https://www.iti.gov.nt.ca/sites/iti/files/What\\_We\\_Heard\\_Resource\\_Royalties\\_Report.pdf](https://www.iti.gov.nt.ca/sites/iti/files/What_We_Heard_Resource_Royalties_Report.pdf)

This status report is organized into four main sections:

**background, regulations development, next steps, and implementation planning.** It also includes several **appendices** that detail engagement meetings and survey results and how suggestions and concerns have been considered and/or addressed.



BACKGROUND

REGULATIONS  
DEVELOPMENT

NEXT STEPS

IMPLEMENTATION  
PLANNING

# Background

## **2014 – Northwest Territories Devolution Act, Northwest Territories Lands and Resources Devolution Agreement and Mining Regulations under the Northwest Territories Lands Act.**

Although changes from federal to territorial administration occurred, the administration of mineral tenure from the exploration and discovery of minerals to the development, construction, and operations of a mine, through to its eventual closure and remediation has remained largely unchanged for decades. When the *Northwest Territories Devolution Act* came into force in 2014, mining regulations were mirrored from the federal *Northwest Territories Mining Regulations* and came under the administration and control of the GNWT. For the first time ever, this allowed the GNWT to start developing a made-in-the-NWT *MRA* and associated regulations.

As mentioned, a key feature of the 2014 *Intergovernmental Agreement* ([https://www.eia.gov.nt.ca/sites/eia/files/nwt\\_intergovernmental\\_agreement\\_on\\_land\\_and\\_resources\\_management\\_0.pdf](https://www.eia.gov.nt.ca/sites/eia/files/nwt_intergovernmental_agreement_on_land_and_resources_management_0.pdf)) was the establishment of IGC, which created a forum for signatories to cooperate and coordinate on matters of land and resource management while respecting the autonomy and authority of each government.

IGC consists of the Elected Leaders of each government that has signed the 2014 Intergovernmental Agreement (for the GNWT this includes the Premier and lands and resources Ministers). Senior officials who work on behalf of each of these governments make up the Secretariat to the IGC (also known as IGCS).

Under the IGC Legislative Development Protocol, the IGCS can form different Technical Working Groups to collaboratively develop different legislative initiatives, such as for the *Forest Act* or for the *MRA* regulations. The protocol allows for the Intergovernmental Council to invite into the Technical Working Groups those NWT Indigenous Governments who have not signed the 2014 *Devolution Agreement*. If that invitation-to-participate in Technical Working Groups is accepted, then Technical Working Groups can consist of senior officials, consultants, and legal counsel from all participating governments.

## **2016-2019 – Collaborative Development of the Mineral Resources Act and associated Public Engagement**

In the NWT, Indigenous Governments, Industry, Regulators, and community interest groups and the GNWT were in agreement that the administration of mineral tenure needed to evolve to reflect northern priorities:

- Indigenous and treaty rights were not being respected;
- The administration system required modernization and was out of date in the existing operating environment;
- The administration system did not coincide with updates to the NWT Land and Water regulatory process; and
- In comparison to other jurisdictions in Canada and internationally, many aspects required review and updating.

Work to develop a new *MRA* began with an extensive period of public engagement. From 2016 to 2019, more than one hundred in-person engagement sessions took place, including community drop-in events and small group meetings held with:

- Municipalities,
- Industry and industry associations,
- Regulatory boards, and
- Non-government organizations.

Public input was also received electronically through the GNWT's *Have Your Say* online engagement platform.

More than 500 submissions were received and considered. Through comments received during these initial engagements, input from the Intergovernmental Council, cross-jurisdictional reviews and policy research, key themes emerged and the goals for a new *MRA* were identified.

The mutually shared *MRA* goals, as outlined in the purpose section of the *MRA*, are to:

1. *Regulate mineral interests efficiently, effectively and in a transparent manner;*
2. *Support the economy of the Northwest Territories;*
3. *Realize benefits from mineral development for Indigenous governments and organizations, communities, and the people of the Northwest Territories;*
4. *Ensure that wealth generated by mineral resources will be used for the benefit of present and future generations of the people of the Northwest Territories;*
5. *Encourage positive relationships between proponents, Indigenous governments and organizations, communities, and the Government of NWT;*
6. *Respect Aboriginal and treaty rights;*
7. *Complement the systems for collaborative management of land and natural resources in the Northwest Territories;*
8. *Improve geological knowledge in the territory; and*
9. *Recognize sustainable land use.*

In 2019, the *MRA* was passed by the Legislative Assembly of the NWT.

## 2020 – IGC Legislative Development Protocol

The creation and adoption of the protocol in 2020 was the important next step in the work towards *MRA* implementation. The cutting-edge protocol allows for collaborative development of land and resource legislation for participating governments.

<https://www.igcnwt.ca/document/igc-legislative-development-protocol-december-2020>

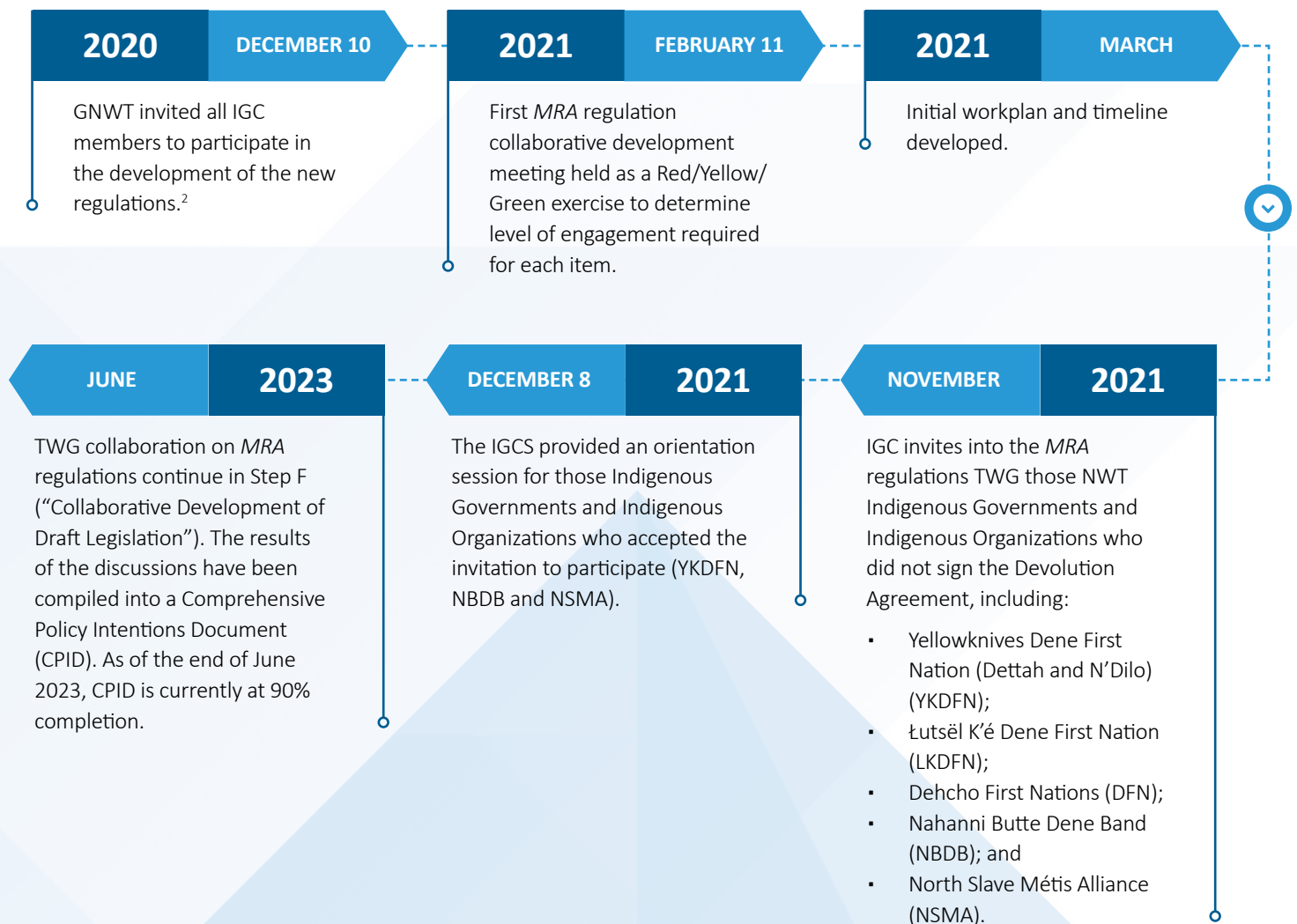
Key points from the protocol are:

- All development, drafting or amending of NWT legislation (statutes and regulations) related to the management of lands and resources fall under the protocol;
- Decisions are made based on a consensus decision-making model as much as possible, based on “good faith, interest-based discussions and negotiations;”
- The protocol allows for “a fair and meaningful opportunity for all parties to fully engage;” and
- Indigenous Governments determine at what level they would like to be involved.

The protocol lays out a seven-step process to realize collaboration. The timeline on the following page depicts how the *MRA* regulation development process approaches each step.

## 2020-2023 – MRA Regulation Development Process Approach under IGC Legislative Development Protocol

The protocol lays out a seven-step process to realize collaboration.<sup>1</sup> While the Protocol process has not reached its final stage (protocol Step 'G'), the following are key milestones to date for the MRA regulations TWG process:



<sup>1</sup> IGC members are listed on the IGC website: <https://www.igcnwt.ca/about/aboriginal-governments>

<sup>2</sup> [https://www.igcnwt.ca/sites/daair-igc/files/2020-12-02\\_igc\\_mtg\\_-\\_igc\\_legislative\\_development\\_protocol-final.pdf](https://www.igcnwt.ca/sites/daair-igc/files/2020-12-02_igc_mtg_-_igc_legislative_development_protocol-final.pdf)



# MRA Regulations Development

Regulations are essentially the ‘how to’ guide for interpreting and enforcing the *MRA*.

The process for developing *MRA* regulations have been:

- GNWT research and options analysis for each policy topic area;
- Presentations to the TWG to gather input and determine support for a preferred option;
- Discussion when disagreements occurred to come to consensus (sometimes in smaller groups);
- Double checking preferred options with Industry to ensure the proposed approach is achievable and to understand the impacts of the change;
- Reaching out through engagement channels (e.g., public survey) to gather feedback on proposed options; and
- Continually revisiting topics where feedback received identified concerns or strong disagreement to the proposed approach.

Out of this collaborative development process, the GNWT developed policy intentions in a comprehensive policy intentions document used as a resource by drafting counsel to draft regulations.

This part of this status report describes this process in detail by:

- Showing the progression/status of the main thematic areas of the regulations;
- Describing how the collaborative development and engagement processes work together; and
- Summarizing the engagement undertaken from 2021 to the end of June 2023.



# Progression/Status of Regulation Development

The initial meetings with the TWG included rating regulation requirements using a Red/Yellow/Green (R/Y/G) exercise. The regulation topics were organized in the following thematic areas:

## BENEFITS

The topics under this area include benefit agreements and socio-economic agreements. Benefit agreements are the private agreements between Indigenous Government(s) and a mining company. Socio-economic agreements are public agreements between the GNWT, and a mining company designed to ensure resource development benefits residents of the NWT, with targets for achieving local employment and procurement for example. Versions of both types of agreements already exist: benefit agreements are similar to impact benefit agreements (which would meet *MRA* requirements) and socio-economic benefit agreements are in-place with all active mining operations.

## LAND ACCESS

The topics under this area are mostly related to building or strengthening relationships between Indigenous Governments and industry during all phases of mineral exploration and mining and are focused on sharing necessary information for decision making and identifying engagement opportunities.

## TENURE

The topics under this area cover all potential changes to the exploration and mining tenure administration to make workflows more efficient, meet best practices and add transparency.

## DISPUTE RESOLUTION/LEGACY/ENFORCEMENT

The topics under this area are related to creating fairness in tenure administration to address disputes and ensure the GNWT has adequate methods to ensure regulations are complied with. These topics also address fairness on how legacy claims and leases need to be treated and enforcement considerations on how GNWT can uphold the proposed regulations.

## MINERAL RESOURCE ROYALTIES

No policy specific topics were evaluated under Royalties, as the work associated with royalties was still focused on program review, evaluation, and economic modeling for the purposes of identifying potential improvements which will lead to creating the specific policy topics. Technical results were discussed and presented for the purposes of defining what specific options will be modeled and discussed for policy development.

# Ratings and Hours Spent

The initial topic rating was done based on the TWG interest and importance. Topics were evaluated throughout the collaborative discussions as a check-in on the topic-specific progression. For this evaluation:

## RED

Red are sections of high interest and require a significant amount of collaborative work; or disagreement remains which needs to be resolved before proceeding to drafting.

## YELLOW

Yellow are sections of moderate interest, which means follow-up is required to reach a consensus prior to drafting.

## GREEN

Green are sections of relatively little interest, or sections where parties have reached consensus. No additional work on green sections is expected at the TWG table until these sections are reviewed in the draft regulations.

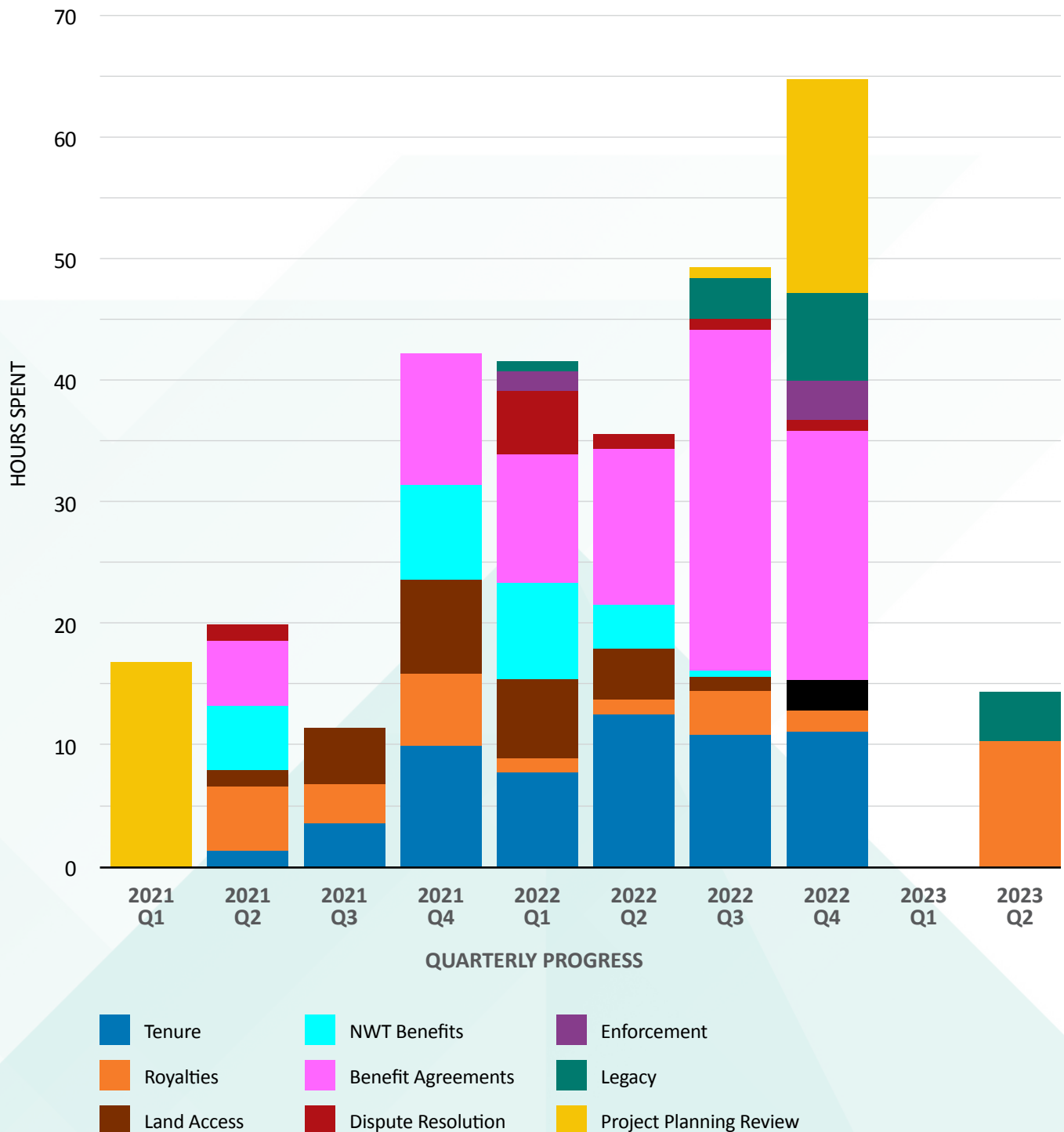
The total number of hours spent, and topics worked through with the TWG was 327.5 (as of June 28, 2023) as shown in Figure 2. Refer to Appendix A-1 for all TWG meetings and topics discussed.

This exercise was completed for 196 number of items (refer to Figure 3 below – note in the figure that some of the topic areas were broken down into subgroups – e.g., NWT benefits and Benefit Agreements).

**Figure 2 – Collaborative development hours spent on MRA regulation policy intentions development.**



**Figure 3 – Collaborative development process by time spent on topic areas.**



Figures 4-7 below depict the progression of topics from initial assessment and discussions to the comprehensive policy intention document which will be used to verify regulations meet agreed intentions.

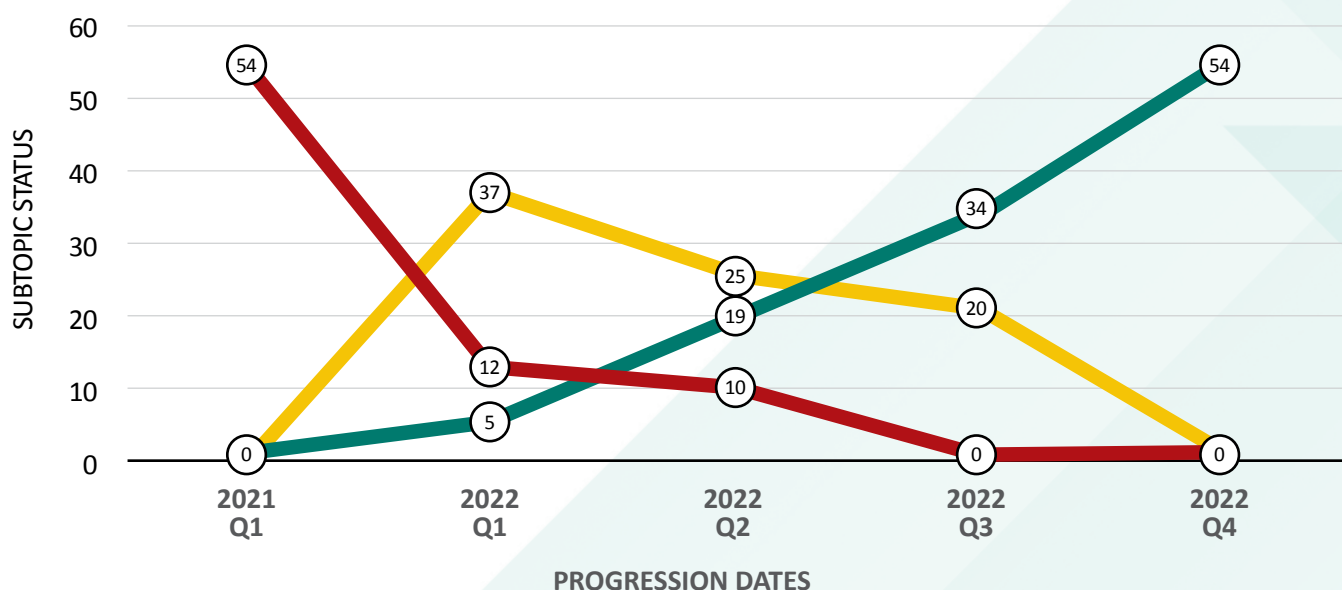
The positive progression in each area shows as the red (high-interest), and yellow (moderate-interest) items, go down and the green (consensus reached) goes up. Some items were quickly moved from red to green (e.g., administrative topics) but some items moved slowly and required many hours of collaboration and discussion at the TWG table (e.g., socio-economic benefits). Note: Specific topics are not equal in significance or effort; many topics were combined for resolution, and some were added as the TWG progressed in its understanding. All original evaluations and new topics are tracked and referred to for the purposes of showing progress and work on the collaborative development.

## BENEFITS

Under the benefits heading, there were 54 topics. Although benefit agreements and socio-economic agreements do exist for active mining companies, there is currently no regulation governing these agreements and very few examples across the country that could be used. Along with this, high interest by the TWG resulted in many discussions to develop the policy concepts for benefits (see Figure 3 on page 21).

All benefit topics were discussed from major decisions (e.g., confidentiality and timing) to more specific decisions (e.g., selection of benefit agreement dispute resolution panel) and were proportionally addressed throughout the collaborative development process. Multiple meetings, discussions, and sub-working groups were used to move each benefits topic to green, indicating TWG acceptance for all policy intentions related to benefits.

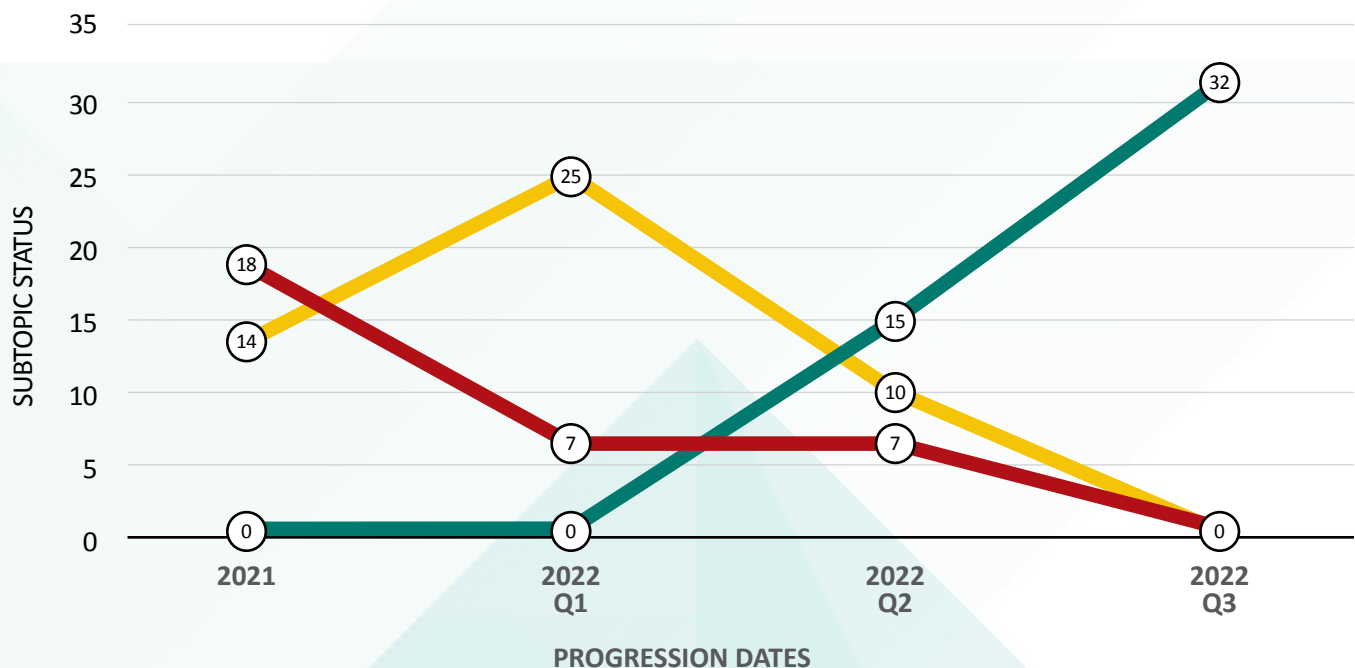
**Figure 4 – Movement from high interest to consensus by the TWG for benefits.**



## LAND ACCESS

Under Land Access, there were 32 policy topics. During the original meetings with TWG, 18 were high interest topics and 14 were medium interest topics. All land access topics were addressed early (e.g., Prospector's Awareness Course), put off until phase 2 (e.g., zones and temporary restricted areas) or, have been amalgamated into tenure topics (e.g., notification for transfer of tenure). Through multiple meetings and discussions with the TWG considering engagement input, all topics moved to green meaning that the TWG is in agreement on the path forward to developing regulations on land access.

**Figure 5 – Movement from high interest to consensus by the TWG for land access.**

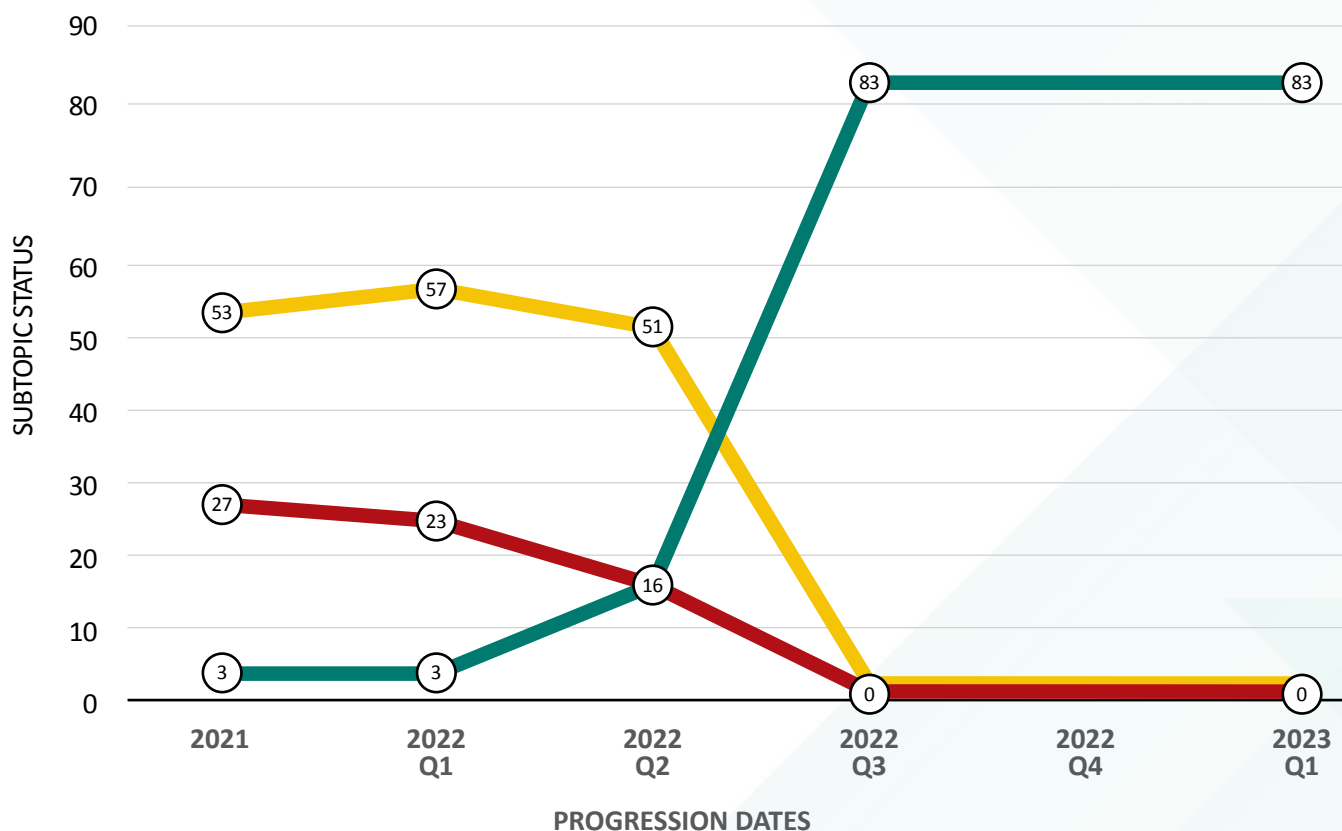




## TENURE

Under the tenure area, there were 83 topics. During the original meetings with TWG, 27 were high interest topics, 53 were medium interest topics and three, which were more administrative in nature, were rated green. Addressing tenure topics started with concept decisions (e.g., merit based tenure concept, involving mineral claims for exploration with escalating work requirements), followed with decisions on major thematic areas (e.g., administering drill core and removal of minerals). Due to the large number of tenure topics, progress was slow until Q2 of 2022 when the TWG re-evaluated R/Y/G for all topics and further characterized most remaining tenure topics as administrative and of low interest.

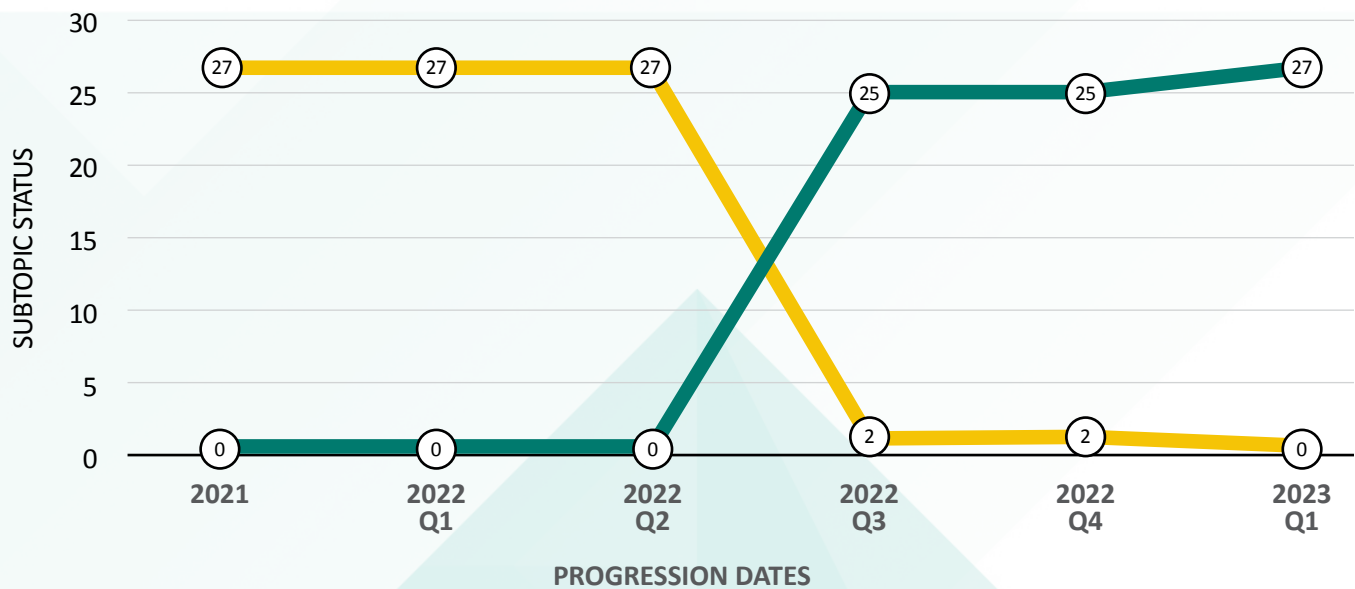
**Figure 6 – Movement from high interest to low interest by the TWG for tenure.**



## DISPUTE RESOLUTION, LEGACE, AND ENFORCEMENT

Under the dispute resolution/legacy and enforcement category, there were 27 topics. During the original meetings with TWG, all 27 topics were designated as medium-interest topics. Topics in this grouping are dependent on decisions in other topic areas (e.g., one cannot determine enforcement of a regulation until decisions on the regulations are made). Therefore, little work on these topics occurred until after most other topics were resolved. Thanks to meetings and discussions with the TWG, from fall 2022 to winter 2023, and engagement input on each of the Dispute Resolution topics, legacy and enforcement, all topics were moved to green. The TWG, however, is revisiting these topics based on input received in regard to its proposed approach on legacy.

**Figure 7 – Movement from high interest to consensus by the TWG for dispute resolution/legacy and enforcement topics.**



# Engagement on the Policy Intentions used for Regulation Development

Engagement has been, and continues to be, a large part of the work to get regulation development to the policy intentions stage. Engagement is done in a systematic way so that comments can be considered by the TWG in the drafting of policy intentions. The following is a list of the main engagement processes that took place:

1. Engagement with NWT Indigenous Governments who were not participating in the Technical Working Group (on-going, 2021-present)
2. Targeted engagement presentations and feedback sessions with Industry (on-going, 2021-present)
3. Initial targeted engagement survey for Industry – NWT & Nunavut Chamber of Mines members (May to June 2022)
4. Second targeted engagement survey – all Prospector Licence Holders (September 2022)
5. Royalty Program Specific Engagement (February to July 2022)
6. Public engagement on the 'Overview of Policy Intentions that will guide the Drafting of Regulations for the NWT Mineral Resources Act' (December 2022 to end of January 2023)
7. Targeted Engagement Presentations and Feedback Sessions with Regulators and Public Interest Groups (on-going 2022-present)

Details for each of these engagement items is provided in this section.

## **1. Engagement with NWT Indigenous Governments who were not participating in the Technical Working Group (on-going, 2021-present)**

For those NWT Indigenous Governments not participating in the Technical Working Group, (see Appendix A2), ITI offered and has continued to offer engagement sessions in which the GNWT explained the proposed changes and gathered input and concerns.

*Note: The GNWT did meet with Dehcho First Nations (DFN) to share information on the proposed changes. This was not formally recognized as engagement and no input from DFN has been received.*

## 2. Targeted Engagement Presentations and Feedback Sessions with Industry (on-going 2021-present)

The intent of Industry engagement is to hear directly from those who are governed by the GNWT's mining regulations and who will be directly impacted by the new MRA. The engagements help the GNWT to understand current issues and challenges from the industry perspective and test or discuss proposed approaches or intentions for the regulations. Since 2021, 73 hours have been invested in engaging industry on proposed policy concepts and royalty reviews (Figure 8).

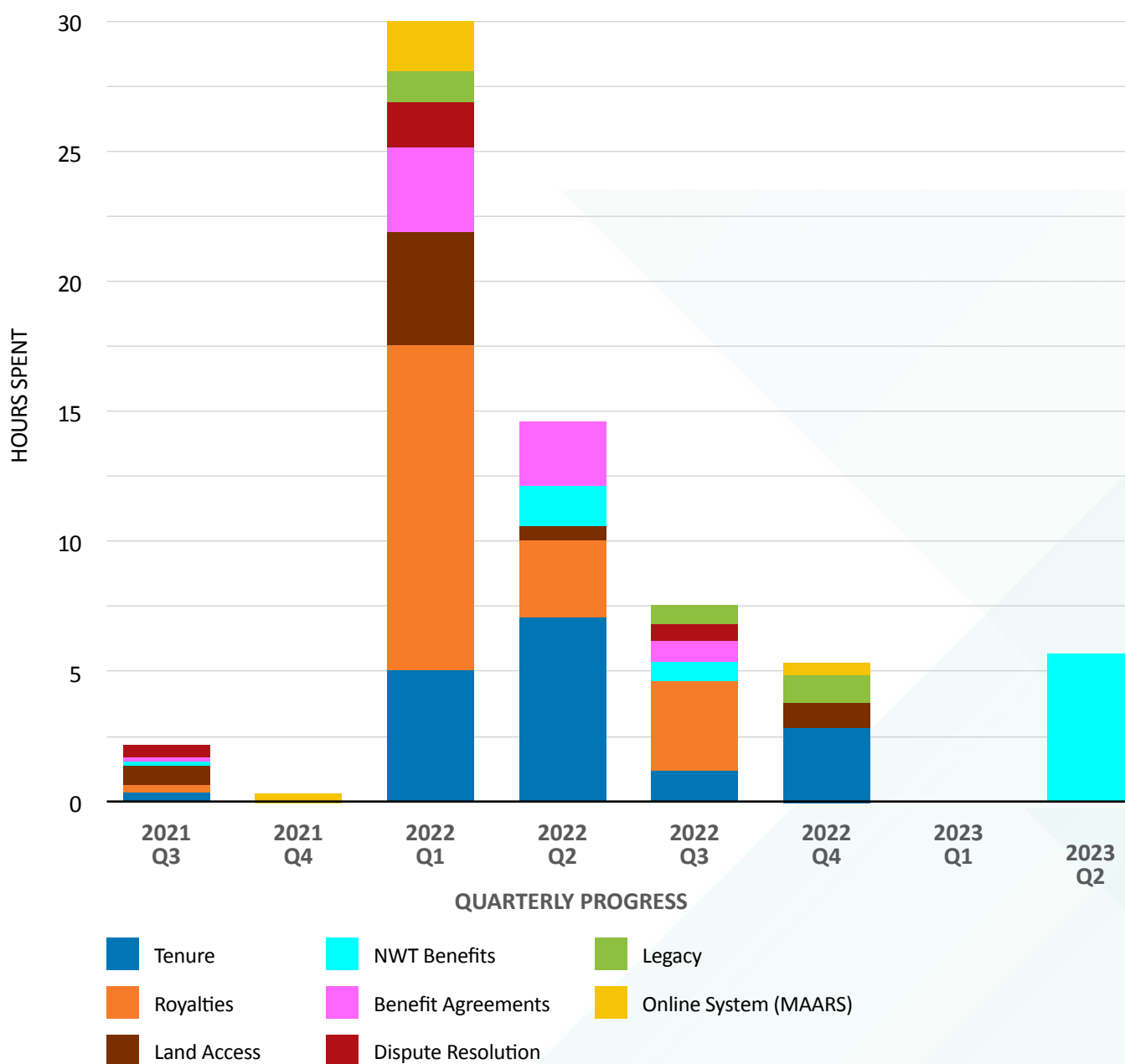
Topics discussed at these meetings mirrored those topics discussed and supported by the TWG (Figure 9). For information regarding specific meetings, please refer to Appendix B1.

*Note: Most engagements took place with NWT & Nunavut Chamber of Mines members. Many of the exploration and mining companies that have interests in the NWT are members of the NWT & Nunavut Chamber of Mines, so meeting with this group allows for the collection of cross-cutting input (e.g., they represent small exploration companies to large mining companies and companies with associated support services).*

Figure 8 – Industry engagement hours.



**Figure 9 – Industry engagement charted by topic.**



### Implementation Planning via Change Management Meetings with Industry (2023)

In addition to meetings on the policy concepts/intentions, change management meetings with Industry were initiated in May 2023 to gain an understanding of the challenges that industry will face with the monumental changes to the regulations. For example, companies may require administrative system updates and/or need to hire additional staff. These meetings will continue so that the GNWT can understand the challenges and support where possible.



### 3. Initial Targeted engagement survey for Industry - NWT & Nunavut Chamber of Mines Members (May to June 2022)

Following initial meetings with Industry in late 2021 and early 2022 (Appendix B1), it was recognized that although questions and points of clarification were being made during the meeting, there was limited determination from the group as to whether a proposed option was supported or receiving resistance. Also, with meetings this large there was little time for all participants to provide input.

A targeted engagement survey was conducted (May to June 2022) to get feedback from members of the *NWT & Nunavut Chamber of Mines* on the proposed policy approaches. The goal was to understand if proposed changes were achievable from all levels of Industry (e.g., from individual prospectors to working mines, or from small to large companies); if there were any issues identified by the proposed approach and, in particular, suggestions on how proposed goals could be achieved.

There were 14 survey topics (e.g., benefits, work requirements, data standards) with one or more questions included under each topic. There was a range of five to eight responses from Industry on the questions. Responses to the questions varied by topic, with some items being supported 100% while others were partially supported. See Appendix B-2 for a summary of each topic and for the detailed survey results. A description of the proposed new regulations compared to current regulations where topics currently exist can be found in *'An Overview of Policy Intentions That Will Guide the Drafting of Regulations for the NWT Mineral Resources Act'*.

[https://www.iti.gov.nt.ca/sites/iti/files/MRA\\_Report\\_ITI-1346\\_Web.pdf](https://www.iti.gov.nt.ca/sites/iti/files/MRA_Report_ITI-1346_Web.pdf)

In general, this survey indicated that there was broad support for proposed regulations including but not limited to:

- Adopting data standards for all submissions;
- Updating the rules around submitting drilling data and maintaining drill cores (these are the cylinders of rock that are removed for analysis to determine what minerals are present and at what levels);

- Increasing a claim life (to 30 years from 10 years) for exploration;
- Moving to online map staking (which will remove the need for physical staking out in the field; already implemented in most jurisdictions in Canada);
- Updating work requirements (these are required to keep a claim active and require modernization); and
- Putting in place mandatory training for prospecting (a Prospector's Awareness Course so that individuals and companies understand the local geopolitical and land and resource management context).

There was some support and some concern for items including but not limited to:

- Mandatory Socio-economic agreements (these are Agreements that are required between the companies and GNWT at the production phase of mining), where respondents provided ideas of how these agreements could support the north but also expressed concerns around ensuring that the agreements set achievable goals;
- Requirements for issuance of a mineral lease (using what is called an Evidence of Deposit Technical Report) – there was a split in support for this as respondents wanted more research conducted to understand if the proposed approach was most appropriate and could be scaled down for smaller projects; and
- Production licences (a new tool being proposed that will be required to sell minerals) were somewhat supported. There were concerns around being able to sell the minerals to test the market.

For the items where concern existed, or was expressed in the comments section of the survey, the GNWT reviewed and conducted additional research on each topic.

Discussion was held at the TWG table and updates were included in the policy intentions document. Questions in the second Targeted Survey for industry included these updates.

## 4. Second Targeted Engagement Survey for Industry – All Prospector Licence Holders (September 2022)

Following the collaborative update to the policy intentions, a second larger targeted survey was sent out to all Prospector's Licence Holders on Aug 29<sup>th</sup>, 2022 and was open until Sept 30<sup>th</sup>, 2022. The goal of this survey was to understand if prospectors and companies shared similar views to *NTW & Nunavut Chamber of Mines* members and to gather additional feedback on proposed changes.

In total, 58 questions were posed in 19 different topic areas. There was a range of 4 to 13 responses on the questions. As with the first survey, responses, and support varied by topic. See Appendix B-3 for a summary of on each topic and for the detailed survey results.

In general, this survey indicated that there is support from Prospector Licence Holders for concepts such as:

- Adopting data standards;
- Drill core submissions and tracking;
- Allowance for simplified reporting (under work requirements);
- Allowance for and use of Indigenous engagement credits (under work requirements);
- Methods of delivery for a Prospector's Awareness Course;
- Production licence requirement for selling minerals;
- Prospector's Licence changes from one to five years and to age of majority;
- Merit base tenure changes (including, claims tenure held for exploration and increased timeline from 10 to 30 years; and threshold of geoscience available to qualify for a mineral lease for the purposes of production); and
- Adopting a non-defined grid solution for the eventual transition to online map staking.

In general, there was some support and concern for the following items indicating that additional information and clarification is necessary before understanding if there is support. These included:

- Work requirements;
- Process around how to give notice to Indigenous Governments on intended work;
- Regulations for benefit agreements;
- Regulations for socio-economic agreements;
- Need for an evidence of deposit technical report;
- How removal of minerals process is to occur; and
- Content included on statistical return reports.

Lastly, there were strong concerns for the following proposed changes:

- Proposed changes from 60 days to 30 days from staking a claim to recording it with the Mining Recorder's Office. This change was proposed to allow additional 30 days for a notice of recorded claim to go out to Indigenous Governments. These concerns are taken into consideration and therefore, it is being proposed to keep *60 days for the prospector to record the claim with the Mining Recorder and 30 additional days for notification to go to Indigenous Governments, totalling 90 days before a claim is official.*
- The proposed confidentiality timeline of a one-year period for notice of intended work to be posted on the public registry. *Due to the significant concerns identified this engagement tool is now being considered confidential and will not be published.*
- Timing to implement online map staking was of concern. All responses indicated that this change could not happen fast enough. *Planning for implementation of online map staking is occurring concurrent to work on implementation in order to expedite this transition as soon as reasonably achievable.*

Following the targeted survey, *NTW & Nunavut Chamber of Mines* presented combined Industry viewpoints to the TWG for consideration. The policy intentions were updated to reflect any issues that needed addressing collaboratively with the TWG.

## 5. Royalty Program Specific Engagement (February- July 2022)

The royalty regulations were mirrored from the federal regulations, as part of the 2014 Devolution Agreement, and have been in existence for more than 60 years. While the core elements have not changed, the royalty provisions have seen substantial changes over the years in response to the changing nature of the mining industry in the North and various legal appeals by industry. The last major revision of the regulations was in the mid- to late –1990s, in response to the emergence of the diamond industry in the NWT. The most recent significant review and benchmarking of the current regulations was completed by the federal government in 2007-08. While recommendations for change were made regarding certain deductions and certain aspects of the rate schedule, no amendments were enacted.

Royalty program engagement occurred concurrent to the MRA regulation engagements. In addition, modeling work was undertaken to help determine if royalty regulations should be amended to better align with MRA and program goals.

Public engagement took place from February 3 to July 29, 2022. Input was gathered from the public, industry, NGOs, and other stakeholders through an online portal and specific virtual meetings. The royalty specific engagements focused on four core questions:

1. Are NWT royalty regulations providing a fair share of the profit?
2. Are NWT royalty regulations contributing to a stable and competitive investment environment in the NWT?
3. Is the utility of NWT royalty regulations being maximized?
4. Are there other ways to realize benefits for the NWT using royalties?

*What We Heard: 2022 Engagement on Resource Royalties* ([https://www.iti.gov.nt.ca/sites/iti/files/What\\_We\\_Heard\\_Resource\\_Royalties\\_Report.pdf](https://www.iti.gov.nt.ca/sites/iti/files/What_We_Heard_Resource_Royalties_Report.pdf)) was released following the engagement, providing excerpts and meeting notes that capture the responses to public engagement questions and topic areas.

- Based on the feedback summarized in the What We Heard report, several suggestions are being examined for consideration. This includes the adoption of a minimum royalty and a variety of potential deductions and allowances.

The next steps for reviewing the royalty regime will be to take the input and feedback received and develop policy options. These options will be tested with financial models to develop recommendations. The recommendations and results based on the financial modelling will be presented for discussion with the TWG. Review by an independent third party will take place to check the methods used and conclusions before any new regulations governing royalties are drafted.

## 6. Public engagement on the 'Overview of Policy Intentions that will guide the Drafting of Regulations for the NWT Mineral Resources Act' (Dec 2022 to end of Jan 2023)

In December 2022, 'An Overview of Policy Intentions that will guide the Drafting of Regulations for the NWT Mineral Resources Act' was released publicly. Responses were collected by email over a six-week period (refer to Appendix C). Specific engagement meetings also took place as requested by public, regulatory boards, community interest groups and Industry.

The GNWT received a total of 112 total comments from 11 separate submissions (eight of which were from Industry individuals or companies and three were from regulator staff). Issues and concerns were identified as follows:

- 26% of the comments from five different submissions, focused on clarifying engagement and consultation processes and results that would occur during tenure administration. *GNWT will provide additional clarity on these questions once additional policies and procedures have been worked out with partners.*
- 24% of the comments from eight different submissions, focused on benefit topics related to processes on Benefits Agreements, Socio-economic Agreements, enforcement related to these topics, benefit legacy concerns, and dispute resolution processes. The large number of comments on these topics likely occurred due to the timing of this public engagement occurring concurrent to the socio-economic program redesign workshop. *Following these submissions GNWT socio-economic staff met with each interest group to fully understand concerns.*
- 11% of the comments, from eight different submissions, focused on the need for further engagement once there is a draft of the regulations available to share. *The GNWT is planning additional engagement on the draft regulations once available.*
- 7% of the comments from two different submissions focussed on developing a fair and transparent Mineral Rights Review Board. *All recommendations will be considered during implementation of the Mineral Rights Review Board.*
- 4% of the comments, from three different submissions, focused on the need to ensure the economy remains strong and the need to adopt online map staking as soon as possible in order to remain competitive. *As a follow-up to these submissions GNWT is working on a more detailed schedule that is achievable for implementation of online map staking.*
- 3% of the comments, from three different submission, focused on considered overall regulator improvements and efficiencies across a variety of regulators. *GNWT is committed to follow-up on these comments in additional regulatory engagements.*
- 2-3% of the comments are related to:
  - Confidentiality;
  - Reasonable service standards for administrative work;
  - Technical information required for the evidence of deposit technical report;
  - Definitions for material change related to benefits;
  - Process for resolving staking disputes;
  - How to increase transparency;
  - Royalties;
  - Legacy;
  - Jurisdiction; and
  - Capacity.

*For all comments above GNWT has considered them as needing additional clarification or suggestions will be considered at implementation.*

## 7. Targeted Engagement Presentations and Feedback Sessions with Regulators and Public Interest Groups (on-going 2022-present)

As engagements were requested, meetings occurred with regulators and public interest groups since 2022 (refer to Appendix D). Meetings with regulators were held to obtain a common understanding of MRA regulation policy concepts and gain an understanding of potential regulatory challenges

related to proposed changes. The meetings with public interest groups (i.e., Alternatives North) were held so that a common understanding could be obtained, and input and concerns could be heard.

# Next Steps

The following next steps are required before the regulations can be completed as depicted in Figure 10.

## Figure 10: Steps remaining in the process to get to final regulations.

As you can see in Figure 10 this process continues to be circular with the TWG continuing to make decisions based on engagement right up to the point when the final regulations are being completed.

The main steps are as follows.



Once these steps are complete, the regulations can be enacted and the *MRA* can become law. After the *MRA* is in force the GNWT will work with the IGCS on the development of the phase 2 regulations (online map staking, zones, and temporary restricted areas).



# Implementation Planning

The impacts of new regulations will be wide-reaching and the GNWT has already initiated internal and external planning to help its own staff and Industry and Indigenous Government staff prepare.

The GNWT is adopting an adaptive change management approach. This approach means interacting regularly with Industry and Indigenous Governments to determine the difficulties that organizations are encountering (or expecting to encounter) as the new regulations come into force. Understanding these difficulties will allow the GNWT to provide support now and into the future wherever possible.

Internally, the GNWT is also focusing on operational aspects including the internal structure that will support the new regulations; training staff and preparing guidance documents, and planning organizational design, function, and work flow changes.

These actions are intended to provide a smooth transition from the current regulations and paper-based system to a new, modern on-line approach enabled by the new regulations.

# Appendices

## Appendix A-1 and 2:

A-1 Meetings of *MRA* Regulation Technical Working Group under the IGC Legislative Development Protocol

A-2 Meetings of GNWT with other Indigenous Governments

## Appendix B-1 to 3: Industry Engagement

B-1 Industry Engagement Meetings

B-2 Initial Industry Survey Feedback

B-3 Targeted Industry Survey Feedback

Appendix C: Public Survey Feedback

Appendix D: Regulatory and Other Public Interests

DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
12-10-20	n/a	email: Invitation to IGCS for participating in TWG meetings	Invited Parties Letter distribution: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Sahtu Secretariat Incorporated (SSI) - Acho Dene Koe First Nation (ADKFN) - Deninu Kųé First Nation (DKFN) - Salt River First Nation	Invitation to Participate to members of the Secretariat to the Intergovernmental Council on Lands and Resource Management: Development of Regulations under the Mineral Resources Act
02-11-21	4	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN)	Introductory Meeting
03-05-21	7	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Acho Dene Koe First Nation (ADKFN)	March (TWG) Mineral Resources Act Regulations (MRAR) meeting  Agenda Topics: - MRAR Red/Yellow/Green Overview Exercise - Introduction to Royalties
03-31-21	7	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Acho Dene Koe First Nation (ADKFN)	March TWG MRAR meeting Agenda Topics: - Engagement Assessment and Planning (Protocol Step C) Workplan and Timeline - Review overall timeline of MRA implementation - Gather input on work steps prior to implementation
04-26-21	7	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN)	April TWG MRAR Meeting Agenda Topics: - Benefits WG topics and areas of interest - Royalties WG topics and areas of interest
04-27-21	4	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN)	April TWG MRAR Meeting Agenda Topics: - Benefits WG topics and areas of interest - Royalties WG topics and areas of interest

## APPENDIX A - 1

MEETINGS OF MRA REGULATION TECHNICAL WORKING GROUP UNDER THE  
IGC LEGISLATIVE DEVELOPMENT PROTOCOL

### RAPPORT D'ÉTAPE

Loi sur les ressources minérales –  
Élaboration du règlement

### STATUS REPORT

Mineral Resources Act –  
Regulation Development

37

DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
07-22-21	7	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC)	July TWG Meeting Agenda Topics: Introduction to: - Tenure Issuance - Mineral Leases - Data Standards  - Land Access - Prospectors Awareness Course - Notice of Application to Record a Claim - Temporary Restricted Area (TRA)  Discussion on: - Benefit Agreements Discussion Paper - NWT Resident Benefits Discussion Paper
07-26-21	0.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Sahtu Secretariat Incorporated (SSI)	Urgent Meeting to Discuss Royalty Research Paper
09-07-21	3.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Deninu Kųé First Nation (DKFN)	September TWG MRAR Meeting (Day 1) Agenda Topics: - Royalties Discussion
09-08-21	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Deninu Kųé First Nation (DKFN) - Acho Dene Koe First Nation (AKDFN)	September TWG MRAR Meeting (Day 2) Agenda Topics: - Prospector's Licence - Mining Cycle - Economic Modelling Review - Prospector's Awareness Course - Data Standards Policy Options Paper - Land Access Proposal (2018) - Prospector's Licence and Awareness Course Discussion Paper

DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
10-06-21	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN)	October TWG MRAR Meeting Agenda Topics: - Royalties - NWT Benefits - Enforcement Update
11-04-21	7	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN)	November TWG MRAR Meeting Agenda Topics: - Land Access - Tenure - Evidence of Deposit - Drill Cores - Benefit Agreements - Confidentiality - Dispute Resolution - Proof of Benefits Agreements
11-08-21	n/a	email: Invitation to Indigenous Governments (non-IGCS members) to participate in LNR TWG meetings	Letter Distribution: Elected Leaders: - Dehcho First Nations (DFN) - North Slave Métis Alliance (NSMA) - Akaitcho Dene First Nations - Łutsël K'é Dene First Nation (LKDFN) - Akaitcho Dene First Nations Yellowknives Dene First Nation (YKDFN) - Nahanni Butte Dene Band	Letter of invitation: to Indigenous Governments (non-IGCS members) to participate in LNR TWG meetings from the IGCS chair.
11-25-21	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN)	November TWG MRAR Meeting Agenda Topics: - Royalties - NWT Benefits - SEA Key Elements - Reporting Timeline - Benefit Agreements - Thresholds and Material Changes - Tenure and Land Access - Prospectors Licence/Awareness Course



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MEETINGS OF MRA REGULATION TECHNICAL WORKING GROUP UNDER THE  
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12-02-21	8	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Inuvialuit Regional Corporation (IRC) - Northwest Territories Métis Nation (NWTMN) - Acho Dene Koe First Nation (AKDFN)	December IGCS MRAR Meeting Agenda Topics: - Tenure/Land Access - Prospector's Awareness Course - Economic Modelling - Notice of Application to Record a Claim  - NWT Benefits - SEA Key Elements - Reporting Timelines - Adaptive Management - Close Proximity and Prioritization  - Benefits Agreements - Dispute Resolutions - Proof of Benefits Agreements - Thresholds and Material Changes
12-08-21	7.5	Indigenous Governments or organization (Orientation to IGCS - TWG meetings)	<b>PARTICIPANTS:</b> Indigenous Government Representatives: - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN) - Gwich'in Tribal Council (GTC) - Inuvialuit Regional Corporation (IRC) - AKDFN - Akaticho First Nation	December orientation to IGCS - TWG meetings for non-IGCS Indigenous Governments Agenda Topics: - Overview of Devolution - IGC Protocol and Legislative Initiatives - Q&A and Discussions
01-13-22	7	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	January TWG MRAR Meeting (IGCS and Non-IGC IGOs) Agenda Topics: - Legacy Discussions - Tenure (Staking / Grid Approach) - Land Access (Zones) - NWT Benefits - Adaptive Management - Engagement - SEA Negotiation Guidelines  - Benefits Agreements (Material Changes)

DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
01-27-22	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	January TWG MRAR Meeting Agenda Topics: - Dispute Resolution (Mineral Rights Review Board) - Tenure - Drill Cores - Data Standards - Work - Land Access (Indigenous Engagement Credit) - Benefits Agreements (Qualified Indigenous Governments)
02-10-22	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	February TWG MRAR Meeting Agenda Topics: - Benefit Agreements (Material Changes) - NWT Benefits - SEA Key Elements - SEA Negotiation Guidelines - Adaptive Management - Benefits Definitions - Close Proximity and Prioritization - Dispute Resolution (Supervising Mining Recorder)
02-24-22	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	February TWG MRAR Meeting Agenda Topics: - Land Access - Notice of Intended Work - Qualification of Indigenous Engagement Credit - Tenure (Production Licence) - Benefits - Qualified Indigenous Governments - Interaction between BA, IBA, and SEA - Mackenzie Valley Environmental Impact Review Board (MVEIRB) Benefits Decisions - Adaptive Management - Benefits Definitions - SEA Enforcement - SEA Dispute Resolution - Royalties (Royalty Regime Matrix)

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MEETINGS OF MRA REGULATION TECHNICAL WORKING GROUP UNDER THE  
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03-10-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	March TWG MRAR Meeting Agenda Topics: - Tenure - Work System - Drill Cores - Benefits - Separation of Impacts and Benefits - Qualified Indigenous Governments and Organizations - Benefits Dispute Resolution - Production Licence
03-24-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	March TWG MRAR Meeting Agenda Topics: - Temporary Restricted Areas - Notice of Application to Record - Indigenous Engagement Credits - SEA Dispute Resolution - NWT Resident Benefits - NEW* SEA Enforcement Framework - Adaptive Management - MRA Dispute Resolution
04-06-22	3	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	April TWG MRAR Meeting Agenda Topics: - Tenure - Work Requirements - Simplified Work - Lease Work - Claim Life - Land Access - Notification of Intended Work - Notification of Application to Record
04-07-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	April TWG MRAR Meeting (Continued from April 6th:) Agenda Topics: - Resident Benefits - Adaptive Management - Close Proximity - MVEIRB Benefits Decisions - Tenure - Drill Cores - Grouping and Allocation - Production Licence

DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
04-20-22	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	April TWG MRAR Meeting Agenda Topics: - Tenure - Removal of Minerals - Work Assessment Extensions and Refund - Lease Issuance - Lease Rents - Land Access - Zones - Indigenous Engagement Credits - Benefits - Policy Intentions Papers Update
04-21-22	3	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	April TWG MRAR Meeting Agenda Topics: - Land Access - Zones - Indigenous Engagement Credits
05-05-22	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	May TWG MRAR Meeting Agenda Topics: - Tenure - Evidence of Deposit - Mineral Tenure - Claims Administrative Function - NWT Resident Benefits - SEA Purpose - Close Proximity/Tiered Prioritization in SEA - Benefit Agreements (Qualified Indigenous Governments) - Land Access - Indigenous Engagement Credits - Temporary Restricted Area

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05-19-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	May TWG MRAR Meeting Agenda Topics: - Tenure - Work Allocation Grouping - Lease Rents - Statistical Returns - Simplified Reporting - Benefits - Material Changes - SEA Program Review Evaluation Final Report - Proposed Benefits Agreements Qualification Test
06-09-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> - Representatives of Chamber of Mines Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	June TWG MRAR Meeting Agenda Topics: - Tenure - Lease Issuance - Transfers - Lease Rents - Benefits - Benefits Agreements Dispute Resolution - SEA Purpose & Close Proximity Update - Qualified Indigenous Government and Organizations - Dispute Resolution - Mineral Right Review Board
06-30-22	1	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	June TWG MRAR Meeting Agenda Topics: - Review R/Y/G Exercise and reach common understanding on outstanding items for dialogue at the July 7th 2022 meeting.



DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
07-05-22	1	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátl'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	July TWG MRAR Meeting Agenda Topics: - Review R/Y/G Exercise and reach common understanding on outstanding items for dialogue at the July 7th 2022 meeting.
07-07-22	7	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátl'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	July TWG MRAR Meeting Agenda Topics: - Land Access (Production Licence)  - Tenure - Temporary Restricted Areas - Evidence of Deposit - Grouping, Allocation, Extension and Cash in Lieu - Suspension and Cancellation  - Royalties (Engagement Results) - Benefits - QIGO Test - Material Changes
07-20-22	7	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátl'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	July TWG MRAR Meeting Agenda Topics: - Benefit Agreements - QIGO Test - Policy Intentions - Benefit Agreements Dispute Resolution - Material Changes - SEA Enforcement  - NWT Benefits (Policy Intentions)  - Tenure - Production Licence - Transfer Notification Process - Evidence of Deposit
07-25-22	2	Benefits Small Working Group	IGCS TWG Representatives from the July 07 2022 IGCS meeting were invited. Those interested attended. (Informal topic discussion meeting)	Agenda Topics: - Benefit Agreement - Dispute resolution - material change

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08-10-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	August TWG MRAR Meeting Agenda Topics: - Tenure - Prospecting Permits - Evidence of Deposit - Issue Tracker - Lease Issuance - Lease to Production Licence - Notification of Transfer
08-11-22	3.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	August TWG MRAR Meeting Agenda Topics: - Benefits - Benefits Agreement Dispute Resolution - Material Changes - SEA Enforcement Framework - QIGO Test - Benefits Flow Diagram
08-17-22	2	Benefits Small Working Group	IGCS TWG Representatives from the August 10-11 IGCS meeting were invited. Those interested attended (Informal topic discussion meeting)	Agenda Topics: - Benefit Agreements - Dispute Resolution - Close Proximity and Prioritization
08-24-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - North Slave Métis Alliance (NSMA)	August TWG MRAR Meeting Agenda Topic: - Tenure - Evidence of Deposit - Production Licence - Benefits - Material Changes - Benefit Agreements Dispute Resolution - SEA Close Proximity and Prioritization
08-25-22	3	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - North Slave Métis Alliance (NSMA)	August TWG MRAR Meeting Agenda Topic: - Staking Disputes - Legacy

DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
09-08-22	7	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA)	September TWG MRAR Meeting Agenda Topics: - Tenure - Evidence of Deposit - Notice of Lease Application - Benefits - Material Changes and Close Proximity - Legacy - Dispute Resolution
09-22-22	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	September TWG MRAR Meeting Agenda Topics: - Engagement Updates - R/Y/G Exercise Review - Legacy (Legacy Claims, Leases and EDTR) - Benefits - Material changes - Proximity
10-12-22	3.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA)	October TWG MRAR Meeting Agenda Topic: - Benefits (Benefit Agreements Dispute Resolution)
10-13-22	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA)	October TWG MRAR Meeting Agenda Topic: - Royalties (Financial Model) - Tenure (Removal of Minerals) - Legacy

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10-26-22	3.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - North Slave Metis Alliance (NSMA) - Sahtu Secretariat Incorporated (SSI) - Kátł'odeeche First Nation (KFN)	October TWG MRAR Meeting Agenda Topics: - Benefit Agreements (Material Changes) - Legacy
11-23-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	November TWG MRAR Meeting Agenda Topic: - Legacy (update) - Tenure (Prospecting Permits) - CPID Review - Material Changes
11-24-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	November TWG MRAR Meeting Agenda Topic: - CPID Review (Page by Page Review)
12-07-22	7.5	IGCS - TWG	<b>PARTICIPANTS:</b> Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	December TWG MRAR Meeting Agenda Topics: - Legacy (Nature of Claim) - CPID Review (Section by Section)

DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
12-08-22	3.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	December TWG MRAR Meeting Agenda Topic: - CPID Review (Section by Section)
12-14-22	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	December TWG MRAR Meeting Agenda Topic: - CPID Review - Indigenous Engagement Credits - Benefits Agreements - Benefit Agreements Dispute Resolution - NWT Benefits - Consultation - Appendix A - Appendix B - Enforcement (Suspensions and Cancellations) - Dispute Resolution (Mineral Rights Review Board) - Tenure (Prospecting Permits) - Royalties (Mirroring)
01-11-23	7.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA)	January TWG MRAR Meeting Agenda Topics: - Enforcement (Update) - NWT Benefits (Secondary industry SEA commitment) - Tenure (Prospecting Permits) - Royalties (Coal and Dredging Regulation Proposals) - CPID Review - Confidentiality Periods - Administrative Section - Royalties Section - Benefit Agreements - Benefit Agreements Dispute Resolution
02-01-23	3.5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Acho Dene Koe First Nation (AKDFN) - North Slave Métis Alliance (NSMA) - Sahtu Secretariat Incorporated (SSI) - Northwest Territories Métis Nation (NWTMN)	February TWG MRAR Meeting Agenda Topics: - Benefits (Benefit Agreements Dispute Resolution) - Enforcement (Update) - Dispute Resolution (Mineral Rights Review Board)



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04-19-23	5	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Northwest Territories Métis Nation (NWTMN) - Inuvialuit Regional Corporation (IRC) - Acho Dene Koe First Nation (AKDFN) - North Slave Métis Alliance (NSMA)	April TWG MRAR Meeting Agenda Topics: - Royalties (Option Development) - Legacy (Risk Appropriation)
05-25-23	3	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Northwest Territories Métis Nation (NWTMN) - Acho Dene Koe First Nation (AKDFN) - Sahtu Secretariat Incorporated (SSI) - North Slave Métis Alliance (NSMA)	May TWG MRAR Meeting Agenda Topic: - Royalties (NRCAN International Mining Tax Study)
06-29-23	2	IGCS - TWG	PARTICIPANTS: Indigenous Governments and Organizations: - Kátł'odeeche First Nation (KFN) - Tłıcho Government (TG) - Gwich'in Tribal Council (GTC) - Acho Dene Koe First Nation (AKDFN) - North Slave Métis Alliance (NSMA)	June TWG MRAR Meeting Agenda Topics: - Royalties (Royalty Calculation Options Development) - Legacy (Discussion) - MRAR Status Report

DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
04-21-21	n/a	email: Letter of Invitation to Engage on the Mineral Resources Act Regulation Development	Letter Distribution: Elected Leaders - Łutsël K'édé Dene First Nation (LKDFN) - North Slave Métis Alliance (NSMA) - Akaitcho Territory Government (ATG) - Yellowknives Dene First Nation (Dettah) (YKDFN) - Yellowknives Dene First Nation (Ndlıq) - Dehcho First Nations (DFN)	Letter of invitation to Engage on the Mineral Resources Act Regulation Development sent to elected leaders from the ITI Minister
06-15-21	7.5	Indigenous Governments or organization (non-IGCS meetings)	PARTICIPANTS: Indigenous Government Representatives: - North Slave Métis Alliance (NSMA) - Yellowknives Dene First Nation (YKDFN)	Introductory Meeting to MRA regulations process and current thinking
11-09-22	7.5	Indigenous Governments or organization (non-IGCS meetings)	PARTICIPANTS: Indigenous Governments and Organizations: - Łutsël K'édé Dene First Nation (LKDFN)	November MRAR Meeting Agenda Topics (General Walkthrough): - Tenure - Benefits - Dispute Resolution - Legacy
11-10-22	7.5	Indigenous Governments or organization (non-IGCS meetings)	PARTICIPANTS: Indigenous Governments and Organizations: - Łutsël K'édé Dene First Nation (LKDFN)	November MRAR Meeting Agenda Topics: - Tenure - Benefits - Dispute Resolution - Legacy
12-01-22	2.5	Indigenous Governments or organization (non-IGCS meetings)	PARTICIPANTS: Indigenous Governments and Organizations: - Dehcho First Nation (DFN) - Kátł'odeeche First Nation (KFN)	December Non-IGC Meeting Agenda Topics: - Overview of Proposed Regulation Changes - Discussion of the Collaborative Process (TWG)

DATE	HOURS	MEETING TYPE	WHO	TOPICS DISCUSSED
07-08-21	3	Industry	NWT & Nunavut Chamber of Mines and members	Introduction to MRA regulations development process and review from MRA decisions
12-15-21	0.28	Industry	NWT & Nunavut Chamber of Mines	"Chamber of Mines regular Monthly meeting - (portion of the meeting was focused on Mineral Resources Act regulations engagement) - New on-line system for MRA regulations (called MAARS) update - Proposed Engagement plan for January, February and March"
01-24-22	2	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement: <ul style="list-style-type: none"> <li>• Approach to creation of Regulations</li> <li>• Merit based tenure</li> <li>• Evidence of Deposit</li> <li>• Economic modeling of work requirements</li> </ul>
01-25-22	2	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulation Engagement: <ul style="list-style-type: none"> <li>• Notice of Intended Work</li> <li>• Notice of Application to Record and Claim Issuance</li> <li>• Online Map Staking</li> </ul>
01-26-22	3	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulation Engagement: <ul style="list-style-type: none"> <li>• Data Standards</li> <li>• Drilling and drill core</li> <li>• Legacy Introduction</li> <li>• Mineral Rights Review Board</li> </ul>
01-28-22	3	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulation Engagement: <ul style="list-style-type: none"> <li>• Benefits</li> <li>• Royalties</li> <li>• Online Map Staking</li> </ul>
02-18-22	3	Industry	Producing Mines and Advanced Exporation Meeting	MRA regulation engagement: <ul style="list-style-type: none"> <li>• Legacy discussion</li> <li>• Royalties discussion</li> <li>• Benefits discussion</li> <li>• Next steps and proposed future meetings</li> </ul>
02-23-22	2	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement: <ul style="list-style-type: none"> <li>• Prospectors Licence and Prospectors Awareness Course</li> <li>• Staking Disputes</li> <li>• Mineral Administrative and Registry System (MAARS)</li> </ul>
02-25-22	2	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement: <ul style="list-style-type: none"> <li>• Notice of Intended Work Form</li> <li>• Royalties engagement</li> </ul>
03-11-22	3	Industry	Producing Mines and Advanced Exporation Meeting	MRA Regulations Engagement: <ul style="list-style-type: none"> <li>• Merit based tenure changes</li> <li>• Production licence</li> </ul> General Topics: <ul style="list-style-type: none"> <li>• Separation of Impacts and Benefits</li> <li>• Benefits Definition</li> <li>• MVEIRB Benefit Decisions</li> <li>• Interaction between BA, IBA, and SEA</li> <li>• Transboundary</li> <li>• Requirement Thresholds</li> </ul> Benefit Agreements topics: <ul style="list-style-type: none"> <li>• Proof of BAS</li> </ul> NWT Resident Benefits Topics: <ul style="list-style-type: none"> <li>• Negotiation Guidelines</li> <li>• Key Elements</li> <li>• Reporting Timelines</li> <li>• Advisory Body</li> <li>• Adaptive Management</li> </ul>

DATE	HOURS	MEETING TYPE	WHO	TOPICS DISCUSSED
03-29-22	2	Industry	Debeers	<p>Royalties sessions 1:1 with producing mines The following questions were asked of specific mines</p> <ol style="list-style-type: none"> <li>1. Transparency &amp; Confidentiality There is abundant concern about the secrecy surrounding royalties. While much of the royalty information should remain confidential, what information can be made public and what information is sensitive. Production numbers? Royalties Paid? Grades? Many of these elements are already reported for EITI and Securities Exchange requirements for some companies, should all companies in the NWT be providing the public the same information?</li> <li>2. Mine Project Definition (Ring Fencing) Currently the Mining project is defined by the Mine Property which consists of a single block of contiguous claims and leases. Are there issues with the current definition?</li> <li>3. Current Profit Regime Royalty Rate Structure Public pressure is always pronounced on the government to collect more revenues. What are the implications of an upward movement in the royalty rate structure?</li> <li>4. Royalty Calculation Point / Saleable Product Point The point of sales of a product to an arms length company or "third party" is the main trigger for the calculation of royalties. The alternate approach is to have an independent valuator determine a market price that is used for the royalty calculation. Are other approaches possible?</li> <li>5. Commencement of production Currently the commencement of production is determined by meeting a rating level of the mill equipment for an extended period or the production of reasonable commercial quantities. Neither of these milestones is well defined or easily measurable. Are there alternative solutions to determining the initiation point for a mine?</li> <li>6. Allowable costs (life of mine) <ol style="list-style-type: none"> <li>i. Pre-production</li> <li>ii. Production</li> <li>iii. Post-Production</li> </ol> Some of the terms or definitions regarding allowable costs may be vague or unclear. Are there particular items that require clarification?</li> <li>7. Current Royalty Reporting Requirements <ol style="list-style-type: none"> <li>i. Volumetric</li> <li>ii. Financial</li> </ol> Are there any issues regarding the reporting requirements?</li> <li>8. Audit Are there issues with the current audit process?</li> </ol>
03-30-22	2	Industry	Rio Tinto	Royalties sessions 1:1 with producing mines (as above)
03-31-22	2	Industry	Mountain Province	Royalties sessions 1:1 with producing mines (as above)
03-23-22	2	Industry	Arctic Canada Diamond	Royalties sessions 1:1 with producing mines (as above)
07-06-22	1	Industry	Gold Terra Resources	Royalties sessions 1:1 with producing mines (as above)
08-18-22	1	Industry	Gold Terra Resources	Royalties sessions 1:1 with producing mines (continued)
07-25-22	2	Industry	Nighthawk	Royalties sessions 1:1 with producing mines (as above)

DATE	HOURS	MEETING TYPE	WHO	TOPICS DISCUSSED
04-13-22	3	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement: <ul style="list-style-type: none"> <li>• Update on progress and next steps</li> <li>• Overview of engagement software</li> <li>• Work</li> <li>• Removal of Minerals</li> <li>• Production licence</li> </ul>
04-14-22	3	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement: Benefits General: <ul style="list-style-type: none"> <li>• Separation of Impacts and Benefits</li> <li>• Benefits Definition</li> <li>• Interaction between BA, IBA, and SEA</li> <li>• Thresholds</li> <li>• Benefit Agreements: <ul style="list-style-type: none"> <li>• Qualified Indigenous Governments</li> <li>• Proof of BAs</li> <li>• Material Change</li> </ul> </li> </ul> NWT Resident Benefits: <ul style="list-style-type: none"> <li>• Negotiation Guidelines</li> <li>• Key Elements</li> <li>• Reporting Timelines</li> <li>• SEA Enforcement Framework</li> </ul>
04-25-22	3	Industry	NWT & Nunavut Chamber of Mines and members	Royalties
05-09-22	3	Industry	Producing Mines and Advanced Exporation Meeting	MRA Regulations Engagement: <ul style="list-style-type: none"> <li>• Benefits</li> <li>• Production Reporting</li> <li>• Statistical Returns</li> </ul>
05-17-22	3	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement <ul style="list-style-type: none"> <li>• Engagement platform overview and walk through</li> <li>• Preparations for Chamber input at Indigenous government Technical Working Group</li> <li>• Merit based tenure system</li> <li>• Indigenous Engagement Credits</li> <li>• Simplified reporting</li> <li>• Grouping and allocation</li> <li>• Statistical returns</li> </ul>
09-09-22	3	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement <ul style="list-style-type: none"> <li>• Evidence of Deposit Technical Report and Lease Issuance</li> <li>• Legacy</li> <li>• Mineral Rights Review Board</li> <li>• Status and Timing for Implementation</li> </ul>
09-28-22	2	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement: <ul style="list-style-type: none"> <li>• Benefits Agreements</li> <li>• BA dispute Resolution</li> <li>• NWT Benefits</li> <li>• Cash in Lieu Extensions</li> </ul>
10-18-22	0.55	Industry	NWT & Nunavut Chamber of Mines	MRA Regulations Engagement: <ul style="list-style-type: none"> <li>- On-line Mapping System</li> </ul>
11-28-22	3	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement: <ul style="list-style-type: none"> <li>- Complete run through of tenure</li> </ul>

**STATUS REPORT**Mineral Resources Act –  
Regulation Development**RAPPORT D'ÉTAPE**Loi sur les ressources minérales –  
Élaboration du règlement**APPENDIX B - 1**

INDUSTRY ENGAGEMENT MEETINGS

DATE	HOURS	MEETING TYPE	WHO	TOPICS DISCUSSED
11-29-22	3	Industry	NWT & Nunavut Chamber of Mines and members	MRA Regulations Engagement: Complete run through of tenure, continued
04-17-23	2	Industry	GNWT - Arctic	MRA Regulations Engagement: - SEA program redesign and Compliance/Enforcement Update Meeting
04-18-23	2	Industry	GNWT - Mountain Province	MRA Regulations Engagement: - SEA program redesign and Compliance/Enforcement Update Meeting
04-24-23	2	Industry	GNWT - De Beers	MRA Regulations Engagement: - SEA program redesign and Compliance/Enforcement Update Meeting
05-08-23	2	Industry	GNWT - Diavik	MRA Regulations Engagement: - SEA program redesign and Compliance/Enforcement Update Meeting
03-30-22	3	Industry	Select group from Industry representing exploration	MRA Regulations Engagement: - Work Requirement Focus Group



TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
Benefits	<p>What Are Benefits? Benefits, in the context of the Mineral Resources Act (MRA), are new opportunities received by residents of the NWT, Indigenous groups, or the GNWT that are positive for the territory or local communities, from wealth and economic activity created by the mining sector.</p> <p>These benefits could include things like jobs, community investments, scholarships and training, or supporting local business. Benefits will become regulated under the MRA to provide clarity to the public about what is expected when opening a mine in the NWT.</p> <p>Royalties are regulated under the MRA and are a form of benefits from the mine. Information on royalties is included here (<a href="https://www.itn.gov.nt.ca/en/newsroom/have-your-say-mineral-resource-royalties">https://www.itn.gov.nt.ca/en/newsroom/have-your-say-mineral-resource-royalties</a>). Other benefits regulated include NWT Benefits and Benefit Agreements.</p>	<p>Historically, Benefits from mining projects have been viewed in terms of employment, training, and local business opportunities. However, more recent ideas of Benefits have begun to include ideas like social &amp; cultural well-being, health, and sustainable development. Are there other types of Benefits you think can come from mineral resource development in the NWT?</p>	n/a	Education, Community Resources/Initiatives, Better Technology brought to the North, and infrastructure development.	Consideration for potential topics within the Socio-Economic Agreements during implementation

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
	<p>What are Socio-Economic Agreements? To provide benefits to residents of the NWT, operators sign Socio-Economic Agreements (SEAs) with the GNWT. By negotiating for benefits, and setting commitments for mines, the GNWT can ensure NWT residents receive benefits from mineral resource development. These benefits also provide priority opportunities to Indigenous and other communities located closest to the mine. Development of MRA regulations seeks to improve how Socio-Economic Agreements are negotiated and implemented, by setting regulations for:</p> <ul style="list-style-type: none"> <li>• Creating a requirement for SEA</li> <li>• Improving engagement &amp; adaptive</li> <li>• Maximizing benefits</li> </ul> <p>What are Benefit Agreements? A Benefit Agreement is an agreement between an Indigenous government and the company seeking to start a major mining project (above a threshold) in the NWT. By requiring benefits to be negotiated with Indigenous governments before a project goes forward, the MRA creates the need for companies to work closely with Indigenous governments for successful resource projects. Unlike SEAs, Benefit Agreements (BAs) ensure Indigenous governments receive benefits through an agreement without the input of the GNWT. Since the goal of Benefit Agreements is to ensure Indigenous governments can negotiate for their own benefits, the MRA regulations seek to streamline the process without impeding on the rights and autonomy of Indigenous governments. As such, development of regulations covers topics like:</p> <ul style="list-style-type: none"> <li>• Who should mines negotiate Benefit Agreements with?</li> <li>• Timing &amp; link to Production Licenses</li> <li>• Dispute Resolution</li> </ul>	Do you feel that by regulating Socio-Economic Agreements (SEAs) the GNWT can provide more clarity about required Benefits and help Industry achieve these agreements more efficiently?	60% No 40% Yes	Comments from the 60% No. The first comment highlights that some agreements set unrealistic and unachievable thresholds. While it recognizes the value of fostering a mutually beneficial relationship between companies and local employment and training goals, it acknowledges that different projects require skill sets that cannot be sourced locally. It also mentions the challenges faced by smaller projects competing with larger competitors, suggesting that these goals should remain aspirational rather than mandatory. The second comment expresses skepticism about government involvement in agreements that have traditionally been negotiated between project proponents and the community. It suggests that introducing an additional negotiator from the government may lead to distrust among the parties involved. The third comment expresses weariness about duplication and confusion resulting from the proposed regulation and how it may interact with existing impact assessments. It raises concerns about potential overlaps and inconsistencies between the two processes.	Additional analysis needed to understand the resistance points and to provide clarity in proposed approach for MRA regulations

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
	Engagement is a priority under the Mineral Resources Act, and all Socio Economic Agreements include methods to engage with Indigenous Governments and NWT communities nearby mine projects. Currently, one of those methods is an annual report on benefits secured by the SEAs.	To improve engagement under the MRA, would you support a public, GNWT created platform for sharing data and providing feedback about benefits reported by the SEAs?	100% Yes	No comments.	Considered for implementation
	Under the MRA, SEAs will focus on providing socio-economic benefits to NWT residents that go beyond impact mitigation. Currently, SEAs provide benefits as a trade off for impacts from a mining project as a condition of the Environmental Assessment process. By looking at benefits separately from impacts, GNWT has committed to the NWT public, that Benefits from a mining project are required on their own merit. Secondly, GNWT is regulating SEAs to provide clarity as to what is required under SEA. Finally, there will be a dispute resolution process to address issues if they arise. This change is to provide clarity for Industry when considering the requirements for opening a mine.	Is the separation of impacts and benefits clear as SEAs are changed from being an impact mitigation tool under Environmental Assessments to being a benefit retention tool under the MRA?	80% No 20% Yes	A clearer definition of benefits vs. positive impacts would be helpful. For example, are benefits different from positive impacts? If yes, how? If not, then what is the effect on the impact assessment process that arises when these are separated? Rent?	Considerations for providing clarity during implementation work

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Data Standard</b>	<p>The GNWT collects work assessment reports from mineral claim holders. Although requirements do stipulate that reports submitted in electronic format must be readable by the Mining Recorder's computer system, existing regulations do not require proponents to submit reports in a specific format or data file type. The lack of regulations under data standards impacts the data integrity, data quality and long-term use of geoscientific data collected under work assessment reporting. Data standards optimize the data for all stakeholders.</p> <p>A number of Canadian jurisdictions have either adopted or are moving towards a single-window approach ('one-stop shop') for online tenure registry / administrative support, and report filing. The GNWT will need to adopt a similar approach to support its establishment of the Mineral Administration and Registry System.</p> <p>The Prospectors and Developers Association of Canada (PDAC) has established standardized submission report templates, file formats/ extensions for numerical data, standards for geological mapping data, standard formats for tables, headers with alpha numeric codes and embedded information as metadata.</p> <p>Changes are proposed to the NWT's regulations to establish the PDAC standards as standards under the MRA.</p>	Do you agree with adopting the Prospectors and Developers Association of Canada (PDAC) Exploration Assessment Digital Data Formats (EADDF) for all work assessment reports for data submission in digital format, including PDF reports and other acceptable file(s) including metadata, spatial or map locations and all geophysics data submission including raw field data.	87.5% Yes, 12.5% No	Comment from the No's: PDAC's Template is not standards	Considered acceptable for use as a standard within proposed regulations

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Drilling and Drill Core</b>	<p>The mineral resource industry uses exploratory drilling to evaluate the contents of known and potential ore deposits and to test for geological structures or mineral commodities. The product and record of drilling activity is drill core or cuttings.</p> <p>Under the current requirements, it is a choice for industry to provide drill core information as part of their work requirements. Due to the limitations of the current work program, this information is collected by industry but not always submitted to GNWT or made available to the public. Drill core information is valuable for determining current and future resource potential and has enduring value as the interest in the area changes with commodity type and evaluation methods.</p> <p>Additionally, academia, government (i.e., geologic surveys), and industry will examine drill core to support geological mapping, research, and other studies to further geologic knowledge.</p> <p>Under the MRA regulations, sharing of specific drill core information would be mandatory, and the destruction of core restricted. Under special circumstances, the drill cores that are removed are preserved and clearly identified.</p>	Do you agree that drill core treatment should be reported for monitoring and to ensure that any drill cores, cuttings, and samples are preserved and maintained to ensure open access to mineral exploration data.	83% Yes 17% No	Comments from No's: cost of core storage is prohibitive, many cores have no value after logging/photographing/scanning by a qualified professional. Core analysis/treatment often will happen outside the NWT so restrictions on moving core in Canada are not helpful and requirements to return core to NWT are cost prohibitive for some.	Considered acceptable support for regulating and implementing the management of drill core. Additional clarity needed for those who doesn't understand the flexibility in the process (e.g. how to obtain permission to dispose of core without value)
		Do you support regulations that will allow the Minister, at their discretion, to take possession of any drill cores after a recorded claim or mineral lease is canceled? Any drill cores that are taken into the Minister's possession would become the property of the Government of the Northwest Territories.	83% Yes 17% No	Comments from No's: core is often taken out of NWT for analysis, would companies be required to return core to NWT when claims lapse? Will NWT publish standards indicating how to preserve and store core? There seems to be a several new cost associated with compliance. would these costs be eligible for work credit?	Considered support for the proposed regulation. Additional clarity needed for some who don't understand the flexibility in the process (e.g. sampling / dispose of core)

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Evidence of Deposit</b>	<p>In a modern merit-based tenure system, lease issuance is strictly limited to projects that fall into the Advanced Exploration Project category. Across Canada, lease issuance is tied to either production or feasibility study stage. It was noted that in the NWT, this was far too late in the process and was adjusted to consider the needs of the NWT mineral industry. It is necessary to ensure that leases are only issued at the advanced project stage.</p> <p>ITI evaluated what could be used to prove that there is a deposit that is economical to produce by looking at various reports that industry uses to accomplish this requirement. ITI is proposing to use the Prefeasibility Study. ITI realizes that not all companies (e.g. Junior companies) would create a prefeasibility report, therefore, ITI is looking for recommendations of an equivalent document(s) that could be used for these companies, to accomplish this purpose</p>	Do you support the use of a prefeasibility study or technical equivalent for the submission of Evidence of Deposit?	50% No, 50% Yes	<p>comments for No's: Projects that have potential economic opportunities for development may not warrant a prefeasibility study and the claim holder should be permitted to take the property to lease at their discretion or maintain the claim in perpetuity by incurring work expenditures. NI 43-101 standards, and to a lesser degree, CIM (Canadian Institute of Mining) Best Practices do not allow for exceptions to their structure and application.</p>	Additional analysis needed to ensure this is the correct standard to use for Evidence of Deposit.
		Do you have any suggestions for alternative document(s) to use for companies who do not create prefeasibility reports?		Suggestions: Evidence of advancing work on the project through their expenditures and/or reporting history; a preliminary economic assessment; need for flexibility because a standard may not always be appropriate.	Consider suggestions for ensuring flexibility in all circumstances.



TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Mineral Tenure</b>	<p>At present, the tenure system in the NWT is temporal, meaning that tenure on a project is held for a prescribed time length and transitions between mineral instruments is guided by these prescribed timelines. The current system also is independent of the quality of the resource and tends to ignore the key development stages of any development project.</p> <p>In proposing changes under the Mineral Resources Act in the areas listed below, the NWT looks to find ways to make key changes that will serve the best interests of all parties</p> <p>Merit-based Tenure</p> <p>Currently, when an exploration stakes a claim in the NWT and the claim has a potential claim life of 10 years. After this time, the claim either is cancelled or must rollover into a mineral lease which is valid for 21 Years. Under the MRA, GNWT would like to change the temporal system to become a merit-based system. Exploration companies will have 30 years to work their claim and prove that there is a deposit that is economical to produce. If this can be proven through what GNWT is calling Evidence of Deposit, the mineral claim would then be eligible to transition to a lease upon application.</p>	Do you support the changes to a merit-based tenure system?	60% Yes, 40% No	Comments From No's: Support for an increase in the work fees to hold a mineral claim, but the escalation criteria is not supported. Respondent felt that it is excessive and punitive. It typically takes 20 years to develop a mineral deposit and metal cycles are typically in 5 year cycles. A claim holder who is actively advancing a project through these cycles, should not need to spend hundreds of thousands of dollars per year, particularly during periods of poor capital markets and/or low commodity prices where the requisite finding may not be available. Someone gets to decide if you get to keep your assets (work and time) based upon their definition of merit.	Consideration for providing additional clarity in the benefits of a merit-based tenure system as it allows for the flexibility identified in the negative comments.
		Do you see a 30-year claim life as adequate time in order to work a claim enough to prove that there is a deposit that is economical to produce (Note: this is an increase from the current 10 years claims)?	83% Yes 17% No	Comments From No's: The Prairie Creek Deposit is not yet in production with a discovery date of 1964. The Nechalacho Deposit was staked in the early 1980's, and is not yet into production. The Kam Point Claims were staked back in the 1940's, and are not yet into production. So based upon this, anywhere from 50 to 100 years seems right.	Considered support for the proposed regulation. Additional clarity needed for some who don't understand that this gives the companies additional time to explore claims without the high costs of going to lease.

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Notice of Application to Record</b>	<p>Under the current system, mineral prospecting takes place throughout the NWT. In some instances, Indigenous communities are not even aware that any activity is taking place in areas where traditional territory has been established or asserted.</p> <p>As another information-sharing tool, the Notification of Application to Record (NAR) would ensure that Indigenous governments and organizations would be notified of mineral claims being staked in their traditional territory.</p> <p>Beyond that, the NAR would also allow all NWT residents to have more knowledge as to what kind of mineral exploration activity is taking place within the NWT and where the new areas of interest lie.</p> <p>The notification would be distributed automatically once submitted and would provide an opportunity for interaction between the proponent and Indigenous governments and organizations before the claim is officially recorded.</p> <p>With the prescribed time period before a claim can be officially recorded, mineral explorers have a desire to start building relationships with Indigenous governments and organizations early and on a positive note. Developing a relationship following NAR is mutually beneficial to all parties</p>	How do you think transparency can be introduced into the early stages of mineral exploration projects to ensure all parties are aware of the activity as well as their responsibilities?		Comments include: a simple notice that is system generated goes to Indigenous Governments; concerns that land use planning has not been complete and therefore areas welcoming exploration cannot be defined; navigating the challenges to consult with multiple NT Indigenous Governments; Provide opportunity for proponent to annotate the notification, allowing it to provide additional info/express intent/personalized response to interested parties; and, confidentiality concerns of names being circulated prior to a claim being staked.	Consider suggestions for implementation
<b>Notice of Intended Work</b>	The attached are two forms a short form and a detailed form that are being proposed for the NOIW. The short form is for proponents that have land use permits or water licences in place and additional details can be found on the public registry. The detailed form is for other activities.	Please share any thoughts or comments that you have about the form or the NOIW process.		Comments include: NOIW should not have the ability to delay field programs; timing should not be more than 30days; potential duplication from what is available on the public registry for Land Use Permits; and, the potential to be conservative on information leading to a less productive tool.	Consider for updating forms during implementation; and suggestions for processes improvements

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Online Map Staking</b>	<p>In working to move from the traditional ground staking process to an electronic one, the NWT is working to make the overall process easier and less costly. To allow for digital staking will ensure that the process of staking a mineral claim in the NWT is not only a little easier, but it will also reduce the potential for staking disputes while also providing an opportunity for the claims to become available within a shorter period of time and less unnecessary costs that can be put into exploration—which will benefit all sides of the sector.</p> <p>An added benefit of online map staking is that with a more agile system in place, potential explorers and developers will be able to select the lands they actually want, and not have to restrict themselves to static tracts of land – most of which they may not even want or need.</p>	How long can Industry wait until it can be implemented?	100% Need ASAP	The majority of the comments suggest that OMS be implemented as soon as possible. The longer we wait to implement, to more money the NWT can potential lose.	Priority for GNWT to implement ASAP
		Do you support implementing a no-grid solution for online map staking?	83% Yes 17% No	Comments for No's: It would make a simple process more complicated	Consider Industry support for selected no-grid technology.
		What would be the best way to introduce an online map staking process?		Comments include: a new modern system with flexibility, user friendly and simply with the ability to obtain training online (e.g. Zoom or teams).	Consider for implementation

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Pro- duction Licence</b>	<p>Production licences are a new tool being proposed to determine the point at which a mineral project gains the right to sell minerals. The production licence sets terms and conditions required to keep the licence in good standing. Projects that exceed a certain scope will require negotiation of benefit commitments (usually in the form of benefit agreements or socio-economic agreements) before a production licence is issued. Smaller projects may not be required to fulfill such benefit commitments, as they will—in most cases—not meet the threshold. However, they will still be obligated to obtain a production licence and meet reporting requirements. Production Licence will be required to produce or sell minerals. This includes selling reprocessed tailings or selling from stockpiles and will be linked to the need to provide reporting for royalties.</p>	Are there any issues with requiring 'production licence' for the ability for an owner/operator to sell minerals?	75% Yes 25% No	Comments for Yes's: concerns with the need to sell minerals to test the market on a variety of situations (i.e. company closing and selling assets, early exploration or post closure with stockpiles).	Consideration for providing additional clarity for Removal of Minerals and clear thresholds for production licences.
	<p>It is at the time of production that Indigenous governments and organizations and GNWT see the need to ensure Benefits Agreements and Socio-Economic Agreements are in place for projects that are above a certain size. It is suggested that this is the tool used to link these requirements to the tenure system. Issuance of a production licence would require the following: Prospector Licence, Mineral Lease, (If above benefits threshold) a completed Socio- Economic Agreement with the GNWT, and, Potential for a commercial agreement* in regard to royalty reporting (*identifying ownership/ operators to clarify complex forms of ownership and equity).</p>	Do you support the suggestions for requiring a Production Licence as noted in the summary?	75% Yes 25% No	Comments From No's: I don't know enough about the current royalty system and regulations, changes to the current system could have severe impacts and for that reason I do not support changing the current system.	Consider support for the proposed regulation

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Prospector's Awareness Course</b>	<p>At the present time, those who are interested in learning more about prospecting in the NWT can take a basic introductory course. Under the Mineral Resources Act the requirements to learn more about the NWT and its mining sector would be a requirement for obtaining the prospector's licence.</p> <p>The new course would include information on several important topics within the NWT, including tenure and issuance, field preparedness, safety, climate and terrain, geology, Indigenous rights and traditional territories, and the obligations of prospectors in establishing formal agreements with Indigenous governments and organizations.</p>	Do you see the benefits of taking a prospector's awareness course prior to staking claims in the Northwest Territories?	67% Yes 33% No	Comments from No's : The No's suggest that this is a not necessary and will deter people from going out staking .	Consideration for providing additional clarity in future communications and ensure the course is informative and not too onerous.
		Are there any suggestions that Industry would see as beneficial for including in a Prospector's Awareness Course that would help all prospectors who are considering exploration in the NWT?		Creating an easier and user-friendly interface so that the course can be administered more easily. Making it so that the claim holder is the only one required to have a Prospector Licence and all the others are considered under the claim holders supervision.	Consider for implementation

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Prospector's Licence</b>	<p>Under the current system in place, every individual that is looking to stake a claim in the Northwest Territories must hold a valid prospector's licence. Although there is little that will be changed under the Mineral Resources Act in this requirement, there are a few small changes that are being considered.</p> <p>The minimum age to apply for a prospector's licence will change from 18 to 19.</p> <p>To lessen the administrative burden for both the licence holders and the GNWT, a prospector's licence would be valid for five years from the date the licence was issued.</p> <p>One new addition to the prospector's licence is the added education requirement. All individuals will be required to take a short prospector's awareness course before the licence can be granted.</p>	Do you have any concerns with the proposed changes?	No comments		Consider support for minor changes to the regulations. No concerns identified.
<b>Removal of Minerals</b>	During exploration companies remove minerals from a site for testing purposes. Sometimes these samples can be quite large and have significant value in which royalties should be paid. To address this gap in our regulatory system the MRA outlines that 'removal of minerals' from a site will be regulated particularly during the exploration (i.e. non-mining/production) phase of the project.	What is a reasonable volume and of what materials, that would be tracked but should be allowed during exploration phases of the project?		Comments include: the linkages of tracking removal of minerals and royalties being paid; concerns with the varying amounts needed per commodity are not consistent which needs flexibility; activities should be permitted more than defining volume (e.g. for grade determination, metallurgy etc. ).	Additional research and analysis needed to understand best approach for managing bulk samples



TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
Work Requirements	At the present time, geoscience data in the Northwest Territories is collected through work requirements on a mineral claim. For companies to maintain mineral claims they must provide assessment reports at a rate of \$10/ha. This is equivalent to \$56,250 within 9 years for a full-size claim. This means that the NWT does not collect approximately 98% of the exploration work when evaluated against annual exploration summaries created by Natural Resources Canada. By increasing work requirements to a higher amount under the Mineral Resources Act, the public will have increased access to geoscience information.	Do you support a significant increase in work rates to adequately collect geoscience information?	83% Yes 17% No	I support an increase to perhaps C\$5-10 per acre - not the punitive escalation. This discourages companies to conduct grassroots exploration and allows other companies to simply wait for ground and information to become available based on somebody else's initiative and foresight.	Consider support for the regulation development.
		Do you support escalating work requirements? Proposal as follows: Year Amount 2 \$10/ha 3-4 \$5/ha 5-9 \$10/ha 10-14 \$20/ha 15-19 \$25/ha 20-24 \$30/ha 25-29 \$35/ha	67% Yes 33% No	Comments From No's: Too much escalation. I support an increase in the work commitment to perhaps \$5-10/acre but not the escalation, which are punitive and discourages investment. Junior miners, credited with most of the discoveries in the NWT and Nunavut go through financial cycles that may make these expenditures untenable. Some additional flexibility needs to be applied.	Consider support for the proposed regulation with some clarity required for those who don't understand what is being proposed.
	NWT regulations allow for Industry to submit reports that are non-technical in nature by a non-engineer/geoscience professional. GNWT feel that simplified reporting is important and are proposing to modernize the amounts and activities allowed under simplified reporting to meet the enhanced work regulations.	Do you feel that simplified reporting is important and should continue to be allowed?	100% Yes		Consider support for the proposed regulation

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Zones</b>	<p>The establishment of zones is intended to encourage development in areas where there is support for development, to encourage exploration in areas which may be underexplored, to provide incentives for proponents, and to potentially allow for areas of exclusive prospecting.</p> <p>Zones will be set up on a case-by-basis. They can be set up by the Minister, an Indigenous government or organization, or by both.</p> <p>Zones can be set up for a period of 15 years and can be extended for another 15 years should the reasons why the zone was set in the first place still apply. There is no minimum or maximum size for a zone, and they do not have to be a certain shape to be set up</p> <p>Once the term of a zone ends, any conditions that were put in place no longer apply.</p> <p>The creation of zones under the authority of the MRA is a unique feature to the NWT and has the potential to lend itself to a two-fold increase in geological knowledge and data which may ultimately increase the economic development potential of regions.</p> <p>This is a new addition to the MRA. A number of defining regulations are required to establish the processes that will be incorporated in applying, engaging and / or terminating zones. Input is also being sought on the duration, size and overall merit of such zones.</p>	Can you think of any determining factors that have to be considered when establishing the zone life duration?		Comments include: understanding linkages with land use planning efforts; zones need to be established for a long time to be beneficial or tenure within the zone needs to be grandfathered for the zone rules if they were to change; and, support for establishing zones to identify where exploration is encouraged.	Additional analysis needed to understand the tools and linkages to other government work (e.g. land use planning)
		What are your thoughts on prescribing size requirements for zone in the regulations?		Comments include: need more details and depends on the zone criteria used.	Consider suggestions for regulation work

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		Do you have a preference on which parameters to include in a zone renewal assessment of merit?		Suggestions include: Total money invested directly/indirectly, number of permits application compared with permits not renewed number of claims staked and area of land staked, long-term benefits and opportunities (e.g. Indigenous Government interest owner)	Consider suggestions for regulation work
		What specific incentives would you find beneficial to be considered for a zone (e.g. reduction in work requirements)?		Suggestions include: Additional credit for filed work, reduce lease cost should claims go to lease, tax incentives, grants or other financial incentives or logistical support, enhanced eligibilities for Mineral incentives program, indigenous program zones where they are on training opportunities hands on working relationships, etc.	Consider suggestions for regulation work

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DATA STANDARDS		Do you agree with adopting the Prospectors and Developers Association of Canada (PDAC) Exploration Assessment Digital Data Formats (EADDF) for all work assessment reports for data submission in digital format, including PDF reports and other acceptable file(s) including metadata, spatial or map locations and all geophysics data submission including raw field data?	92%	<p>&gt;This is a good idea. To the degree possible, the NTGS should undertake a project To update previous data To This standard, at least in terms of data organization and coding.</p> <p>&gt;Important to retrieve, digitize and archive historic work. Use BC or Ontario formats to create a data base.</p> <p>&gt;It is a necessity to increase the quality of data being provided for assessment work.</p>	confirmed support for the proposed regulation
WORK REQUIREMENTS		Do you support the proposed work rates to adequately collect geoscience information?	50%	<p>&gt;Increased publicly available work increases the likelihood that another party might get interested in a property. More data means a variety of interests might now find properties of interest.</p> <p>&gt;Certainly, the cost/reporting structure does not support the current costs of exploration in the NT. Consider a one-year requirement (not year 2) and escalating costs starting in year two - Regulations should capture exploration costs incurred under mining leases as well. More data in the public domain will result in greater exploration success and therefore greater investment.</p> <p>&gt;I support this as it results in more publicly available geoscience data, and it also forces explorers to continue exploring or drop the claims, rather than do a bit of work, then sit on the ground with no new exploration work being done. Current assessment requirements are often eaten by aviation and logistics costs, and while these expenses should be accepted for credit, it means that in far flung locations of the territory a two person crew doing a week or two of prospecting can be enough to take the claim to lease. Which means showings can be sat on for decades with no active exploration work. This increasing work requirement proposal will help make the space more competitive and encourage exploration expenditures over multiple years.</p>	Results from this survey are more divided from initial input and focus group recommendations and the initial targeted industry survey. Comments indicate a concern for increased working on a site. Analysis of work data collected indicates different results. Additional clarity in topic is needed for Industry to support changes

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		Do you support the simplified reporting to a maximum value equivalent to two years' worth of work?	73%	>Prospectors make many of the initial discoveries that result in larger exploration programs and in some cases mines. The requirement to have a professional geoscientist sign off on these reports for small and often straightforward surveys, is a detriment to the collection of additional data and to prospectors pursuing targets in the NWT. Many prospectors are highly skilled, and while they may not have the formal educational qualifications necessary for licensing, the idea that they can't report on their own work without a P.Geo/P.Eng. signing off on it is silly. Also all reports are reviewed by the NTGS technical staff anyway, so all reports accepted for assessment credit should be reviewed by a P.Geo, regardless prior to acceptance.	Consider Support for the proposed regulation
DRILL CORES		Do you agree that the treatment of drill core should be reported for monitoring and to ensure that any drill cores, cuttings, and samples are preserved and maintained to ensure open access to mineral exploration data?	56%	>Drilling is expensive, especially in remote locations. Preserving drill core in a way that allows it to be reused effectively in the future and the preservation of key data, lowers future exploration costs, and reduces the environmental impact of drilling.  >Modern practices involve high-resolution photography, electromagnetic imaging of drill core, specific sampling regimes, and the disposal of core. Data acquired through imaging and sampling should be included as work for assessment. The storage of core is becoming redundant, dependent on the type of commodity being evaluated.	Results from this survey are more divided from initial targeted survey. However results are divided all comments obtained for negative input suggest support for the process. Additional clarity in communicating this topic is needed.
PROSPECTORS AWARENESS COURSE		Do you have any concerns with this method of delivery?	39%	>Training materials and guides should be provided, but this should not be a requirement. It will end up being another piece of red tape to have to navigate and a blocker for junior explorationists.  >If it is to be a requirement for a license having the course online will ensure everyone can access the course whenever and not have to wait for a face to face training session.  >I have not concerns with this course although I don't know how useful it will be. The course hardly has anything to do with prospecting. Maybe it should be called a PCER course (political, cultural, ecological and regulatory awareness course...or some other clever combination of letters). No one is assessing someone's awareness on prospecting protocol or standards. Sometimes the person taking the test (i.e.. within a company) will not be the person performing the work in the field. You do not need a prospector licence to do exploration work for a company.	concerns identified in the value of the course however, not many concerns regarding flexibility of delivery. Consider support for delivery methods identified and additional clarity needed to communicate the benefit of this mandatory course.

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
NOTICE OF APPLICATION TO RECORD		Do you support changing the submission deadline for Applications to Record Mineral Claims from 60 days after ground staking is completed to 30 days after staking is completed?	44%	<p>&gt;Confused how this will work with change to online staking? Or is this a stop-gap measure for the time being. Also somewhat confused as to how this works on areas not currently withdrawn from staking or in government lands in areas of settled land claims. Engagement is currently governed through the Land and water board process, Moving the timeline to 30 days after staking is fine, as transport is more efficient than in the old days.</p> <p>&gt;In the physical staking world, 60 days is still a better option for anyone who spends time in the field staking (mostly prospectors) to get back to town and register a claim. Some prospectors still go to the field for several weeks at a time and they may wish to see sample results before they decided to formally register any claims. Since the pandemic, there have been issues staffing businesses, including aviation and labs. In addition to weather hold ups, sometimes planes just are not available because the pilots have met duty days or there are not enough pilots to fly. There also could be hold ups at geochemical laboratories processing samples. Keep the requirement to file a claim after it has been physically staked at 60 days. Applications to Record Mineral Claims can be made within the 60 days.</p>	Divided opinion on proposed timeline changes from physical staking to recording, noted redundancy for the change if we can move to online map staking. Consider uncertainty in timing for regulation development additional time could be allowed to continue to give the prospector 60days and add an additional 30days for engagement.



TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
NOTICE OF INTENDED WORK		The attached forms are being proposed for the NOIW. Do you have any general comments or concerns regarding the implementation of a NOIW?	N/A	<p>&gt;This is fine provided one is not needed to explore on lands not under mineral tenure (activities under threshold). Requiring that would be a significant issue regarding confidentiality of the evaluation of mineral targets prior to claim staking, and a significant deterrent to new geological thought and exploration. Other concern is overloading departments of IGOs, etc., with additional paperwork for activities with very little/no environmental impact, when the escalating land use triggers are already well established. Additionally, this should be a click and submit thing, rather than something that takes a lot of time to hear back on, seasons, weather, logistics and financing for these activities are dynamic things and additional delays are a significant deterrent to the sector.</p> <p>&gt;There is no need for a NOIW when Land Use Permits and Water Licences have been issued. The work that will be done has already been reviewed and approved by communities through the MVRMA processes. This only adds work for the proponent and communities. Engagement Plans are required by the MVRMA process. Engagement Plans describe the engagement process that communities and industry have agreed to, including when and how communities want to be engaged. Engagement Plans are developed with IGOs and are then reviewed and approved through the Land Use Permitting and Water Licencing Processes. There is no need to add another form that does not reflect what communities have already negotiated with a company. It helps no one and creates a burden on resources for all parties and could result in unnecessary delays in schedule.</p>	Additional clarity in topic needed particularly to communicate its benefits. Consider suggestions for implementation
		Do you have any concerns about the specific information being requested on the attached forms? (Please share any thoughts or comments that you have about the example forms for the NOIW.)	N/A	<p>&gt;I find the top of the full form confusing. If they have a water licence/land use permit then wouldn't they just fill in the lesser (second) form? The top of the more in depth form should clearly state that form is for when there is no authorized valid land use/water permit and if they have the authorization, fill in the other form (?).</p> <p>Not sure why there needs to be any mention of what benefits the work will do (i.e.. hiring, spending, etc.) as shown under Location and Access. Will explorers be denied access if they don't justify their work?</p>	Consider suggestions for implementation of forms
		Is 30 days prior to completing exploration activities a realistic amount of time to submit the details identified on the form?	25%	<p>&gt;This is way too long, should be shorter. 15 days or so maybe, these things and schedules change dynamically in this industry especially for early stage projects.</p> <p>&gt;10 days</p> <p>&gt;The notice should only give notice, followed by applying for assessment credits in a required digitized report form. This reporting should be completed in a strict deadline.</p>	Consider suggestions for regulation development (e.g. flexibility of timing close to program)

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		ITI proposes to include the NOIW on the Public Registry. Do you have any thoughts or concerns about when a NOIW should be made publicly available? Are you concerned if NOIW is posted on the public register prior to field work occurring?		<p>&gt;This gives away details that companies may wish or even may need to keep private as per security provisions (as releasing work intentions may have an affect on stock market purchases/sales?). I do not know the rules around such releases of information but I suspect there are some (since BreX when reporting requirements became a lot stricter). I remember working for a company years ago (pre-BreX) that found it surprising that the Northern Miner reported the company's intentions for optioning a certain property and looked to the staff for who could have been the mole that released the information unwittingly. The government doesn't like to give details of all their intentions either so surely they understand how important this kind of information would be to some explorers.</p> <p>Besides, intended work is not 100% work that will happen!</p>	Consider suggestions for regulations development (e.g. confidentiality concerns and the need for amendments post program)
		Should be a notice only and work should not be subject to registration. If the notice is not given then assessments cannot be applied for tenure credits. - IF YES WHY?		<p>&gt;May interfere with corporate reporting obligations under the CSA or provide information to competitors that should not be shared.</p> <p>&gt;I just don't see this as valuable in anyway. Why post the form when a company will have likely already made it public as to the work they have completed and results. There is too much potential for confusion if a form for last season is posted a year later prior to work for another season (because people looking at the documents on a public registry may not pay attention to the dates, etc.).</p>	Consider for regulation development
		Are you concerned if NOIW is posted on the public register: after 2-3 years? IF NO< WHY?		Notice should be registered prior to work commencing not after.	consider suggestions for regulations development (e.g. confidentiality concerns )

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		What Issues need to be considered?		<p>There are several issues that need to be very carefully navigated on this front. First is the issue of confidentiality, this is particularly the case for activities being conducted off mineral claims on open lands not under tenure. This is especially important to individual prospectors or entities with limited funds, who want to conduct a geological investigation of a new area prior to going through the expense of staking claims. These investigations are often extremely low impact (think a camping trip, look at some rocks, maybe collect a few, maybe some geophysical surveys with no line cutting), and are the starting point for how new discoveries are made. If exploration in this manner becomes a matter of public record prior to the commencement of the work, someone could stake over top of the area, and ruin the actual worker's chance of a discovery. Even disclosing this to government departments could potentially be an issue as people talk. Having it become public well after the fact is ok, as the same process occurs with assessment reports. Perhaps the two could be tied together, the NOIW becomes public when the assessment report is due.</p> <p>The second issue here is that this seems to be blurring the lines between a mineral resources act, and a land use act. The thresholds for engagement, the levels of notifications required are well set-out in the land and water board process, this seems like additional paperwork for everyone, and will strain the capacity of both IGOs and GNWT departments.</p> <p>Thirty days seems to be a long time for low-level land use notifications as well. Early stage exploration is done on a tight budget, and the availability of logistics, contractors and suitable weather changes quickly. A shorter notification period would be preferred, though perhaps it could be scaled as with land use regulations. So a small program with minimal disturbance would be say 15 days, where as a drill program would be 30 days. Ideally, details like dates and minor adjustments to programs could be made on the fly, or a range could be specified.</p>	consider suggestions for regulations development (e.g. confidentiality concerns )
INDIGENOUS ENGAGEMENT CREDITS		If you are currently (or previously) participating in Indigenous Engagement, would you have considered utilizing a credit to recognize this effort? YES AND WHY?		<p>&gt;Dialogue between prospectors and First nation groups is essential and promotes community.</p> <p>&gt;Assessment credit should reflect the costs of working on the claims, and the costs of engagement are one of those costs. Allowing a certain percentage to be claimed against assessment credit would ease cost burdens on explorers and help move engagement more firmly into the value added category.</p>	Considered support for the proposed regulation on IEC

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		What is the maximum value that should be allowed for an IEC?		<p>&gt;I think this would depend on what qualifies for IEC and the exploration work being done. A small prospecting stint will not require huge amounts of engagement where as a drill program certainly should beg more interaction (like a community visit). The examples in the next question are hard to really contemplate and make some nervous...\$12,000 is roughly the amount an explorer must spent in the first two years to hold a claim but if they are just doing prospecting and a bit of sampling (low impact work), is there going to be an expectation they will spend 20-30% of their work costs on engagement?</p> <p>Even if it is voluntary to claim the credit, there is potential that the expectation will be there to spend X amount of money on engagement if X percentage is potentially awarded.</p> <p>&gt;80% - for a Jr Explorer with a small property (or prospector for example)</p> <p>- Engagement costs could be the bulk of an annual expiration budget</p>	Consider suggestions for regulation development
		Do you prefer a higher or lower percentage of the filed technical work assessment? (For example, a report valued at \$10,000 would be eligible for either a 20% (\$2,000) or 30 % (\$3,000) Indigenous Engagement Credit)		<p>&gt; Out of all the feedback received:</p> <p>57% think Lower percentage (20 percent) of geological and technical work assessment report</p> <p>43% think Higher percentage (30 percent) of geological and technical work assessment report</p>	
<b>MINERAL RIGHTS REVIEW BOARD</b>		What would an appropriate limitation period be for the filing a request with the Mineral Rights Review Board?		<p>&gt; Out of all the feedback received:</p> <p>50% Within 30 days of the recording of the decision or the act or omission</p> <p>33% Within 45 days of the recording of the decision or the act or omission</p> <p>17% within 60 days of the recording of the decision or the act or omission</p>	Consider suggestions for regulation development.

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		What would an appropriate limitation period be for the filing a request with the Mineral Rights Review Board? (Other (please specify))		>I am fine with 30 days but it would possibly be helpful to add 'business' or 'working' days to any qualifications of time in the MRA. While this board will be remote from the GNWT, any request for a review under the regulations should provide for the fact that the MRA is government controlled and the time line should factor in government office schedules. The GNWT is closed for periods of time (for example, the Mandatory Leave with Pay period that can see government offices closed for nearly two weeks depending on how other holidays stack up). If a person needs to get information from the Mining Recorder or other information to formulate their request for a review, it would be helpful to give them a full 30 business days.	Consider suggestions for regulation development.
		Should the MRRB members have mandatory meetings on an annual basis?	100%	Yes	Consider suggestions for regulation development.
		Should the MRRB members have mandatory meetings on an annual basis? (Other (please specify))		Feedback suggests more than 1 meeting a year, based off the seasonality in the NWT	Consider suggestions for regulation development.
	Training Questions Regarding Mineral Right Review Board	Yes for training and why? Line 156		<p>&gt;It is important that members of these boards understand the processes they are dealing with and all the factors that affect decision making.</p> <p>&gt;Members should be selected based on their qualifications. Qualifications should be stringent and require a great deal of experience working in the NT. Even so, some basic training on the board, its jurisdiction, and its purpose will be required.</p>	Consider suggestions for regulation development.
	Training Questions Regarding Mineral Right Review Board	If Yes, On what topics would you suggest training occurs?		<p>&gt;I'm not qualified to suggest this level of detail - an understanding of the environmental/wildlife impacts of mining and exploration would be important</p> <p>&gt;Mining and exploration broadly, and specific concerns in the north, understanding the processes and stages of these projects, relevant mining and other laws, etc.</p> <p>&gt;basic training on the board, its jurisdiction, and its purpose otherwise, the qualifications of members should be sufficiently strict so that additional training is not required.</p>	Consider suggestions for regulation development.
	Training Questions Regarding Mineral Right Review Board	If Yes, How frequent should mandatory training be?		<p>&gt;Annual</p> <p>&gt; At the start of their term or renewal of term</p>	Consider suggestions for regulation development.

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
	Training Questions Regarding Mineral Right Review Board	If no for training, Why?		>If they are qualified enough to be on the board, I would hope they are qualified enough to deal with the issues at hand. I can see some might think they would need dispute resolution training or board training but I am not sure those are as important as understanding the technical details of a mining related argument and/or any legal requirements. No amount of training can make people impartial or objective, which are really the more critical qualifications of anyone on a board deciding on disputes.	Consider suggestions for regulation development.
	Should the MRRB have the ability to determine a matter without a hearing? (i.e. make a determination based solely on the application and evidence in certain instances.)	If Yes, WHY?		> to maintain an appropriate level of efficiency  > Small matters should be able to reviewed and resolved quickly if both parties consent to it, and will save on legal costs.  > I would think that would be appropriate for smaller concerns although those filing a dispute might argue other wise. Lots of hearings are costly affairs at taxpayer expense.  > Not all actions require hearings.	Consider suggestions for regulation development.
	Should the MRRB have the ability to determine a matter without a hearing? (i.e. make a determination based solely on the application and evidence in certain instances.)	If No, WHY?		> A decision without a hearing is fine but must be subject to an appeal process.  > Many people do not understand evidence-based decision making and what that means in terms of what needs to go into a package for a board. the hearings allow an opportunity for parties to flesh out their evidence and have their voice heard.	Consider suggestions for regulation development.
		What would be an appropriate minimum notice period for the time, date and place of the hearing to be given to the requestor and any other party? (Notice period, form of notice and required recipients.)		> 30 Days seems like the general consensus	Consider suggestions for regulation development.
		Do you have any suggestions on what is contained in the MRRB's annual report?		>I would think the dispute itself deserves a decision that is made public and accompanied by the reasons for the decision. That would be more relevant than a report to the Assembly.  >Only a summary of actions taken since the last report, and it shouldn't be annual it should be seasonally timed.	Consider suggestions for regulation development.

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Benefits		ITI is proposing a list of thematic commitments to be negotiated in all SEAs. This would ensure that all SEAs provide benefits in similar areas, but would allow proponents to negotiate the level of benefits provided under a specific theme. (e.g. Employment is a common theme in all SEAs. All SEAs contain northern employment commitments, but the exact level of northern employment required is different for each mine. Which types of benefits do you think are most critical to develop from mineral resource development in the NWT? (select up to 4)		Overall percent interest comparing all submitted responses: >Employment Practice 63% > Human Resources and Development %87.5 > Business Development 63% > Indigenous Participation 50% > Legacy Projects 25% > Social Wellbeing 50% > Cultural Wellbeing 25% > Sustainable Development 25%	Consider suggestion for policy development as details of the SEA standardization will not be found in the regulations.
		The MRA aims to streamline reporting requirements with universal dates for annual reporting (i.e. annual, quarterly, etc.), a list of required reporting topics and units of measurement, as well as regulated meetings (i.e. Quarterly meetings with the GNWT, meetings with Indigenous governments, senior officials meetings, etc.).What topics do you think should be publicly reported? (Pick all that apply)		Overall percent interest comparing all submitted responses: >Employment in the mining industry 100% > Business Procurement in mining 56% >Education & Training (i.e. Apprenticeships, scholarships, etc.) 100% >An overview of Gross Domestic Product (GDP) from the NWT mining economy 56% >Participation of Women in Mining 56%	Consider for implementation (public reporting)



TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		What other Benefits should be included in the reporting?		<p>&gt;The entire SEA should public</p> <p>&gt;New developments coming out of the northern mining industry that would represent changes to the industry at large and improvements in the way the global industry operates. A good example of this would be the ore sorter at Thor Lake.</p> <p>&gt;Retention rates and analysis</p> <p>&gt;Support for the secondary infrastructure, business and employment opportunities created by the development of primary projects.</p>	Consider for implementation (public reporting)
		To better achieve commitments under SEAs, what powers under adaptive management would be appropriate for an advisory body to have? (Pick all that apply) and What other power under adaptive management should be considered for the advisory body?		<p>&gt; Ability to recognize factors that may prevent some goals from being met, due to changing circumstances, and recognize these when evaluating the performance of the SEA.</p> <p>&gt;being independent of government and company...with the power to refer to another independent government watchdog...</p> <p>&gt;Identify responsible parties and have powers that include discipline of those parties.</p>	Consider for implementation
		For mines that exceed the threshold size, proof that all Benefit Agreements have been signed is required as part of the application for a production licence. This proof would be submitted as formal letters from Indigenous Governments and Proponents. Do you see any issues with requiring letters as proof that Benefit Agreements have been signed? If YES, WHY?		<p>&gt; In the circumstance where the involved governments do not wish to negotiate a BA for whatever reason (seems unlikely though could be from other ways, such as an ownership interest, etc.) then there should be an exception for this, to allow for autonomy of decision making.</p> <p>&gt;Benefits should be negotiated between the governments of Canada and the NWT (the people's representative) and the Indigenous Governments and Proponents. Standards should be established with equal terms for all. Having every different entity negotiating separate agreements is pure folly.</p>	Consider additional communications during implementation

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		When a mining project undergoes a significant change that affects the benefits it may provide (known as material change), a review of the project's BAs may be appropriate to ensure the level of benefits proposed matches the new scope of the project. What specific indicators do you think would be appropriate for signaling when a material change has occurred? (Select all the apply) (Other (please specify))		<p>&gt;Significant change to economic conditions, or regulatory environment.</p> <p>&gt;BA's should be standard and in place prior to exploration so risk and reward is known and recognized. Mining is a highly risky endeavor for the stakeholders who fund and undertake the process and should not be subject to review after the risk is taken. Tax the profits is the established standard and is accepted as fair and equitable.</p> <p>&gt;A material change in a project should not trigger a review or update or revision of a BA.</p>	Consider suggestion for regulation development
	In the event that a dispute arises during the negotiation of a Benefit Agreement that cannot be resolved by the proponent and Indigenous Government, the MRA regulations will contain provisions for a Dispute Resolution body. During renegotiation of an agreement caused by material change (see the previous question), there is potential for similar disputes to arise. Is it appropriate to apply the Dispute Resolution body to disputes that arise from renegotiation of a Benefit Agreement under material change?	If YES, WHY?		<p>&gt;Provides clarity on the process and a definitive timeline for resolution.</p> <p>&gt;Always leave room for a better agreement.</p>	
		If NO, WHY?		<p>&gt;The concept of renegotiating an agreement when success is achieved is unfair to the investors and developers who took the risk. Taxation of profits at an established rate is the norm in Canada and should be maintained especially in remote and hostile place like the NWT.</p> <p>&gt;See previous comments. Resolution should be between the relevant groups, and 3rd party options already exist for unresolved issues due to any change, material or otherwise.</p>	

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
<b>Pros- pectors Licence</b>		Do you have any concerns with the administrative changes (age and length of issuance) proposed ? and Yes, WHY?		<p>&gt;18 is fine, legal age to vote, changing to 19 makes no sense. 5 years is fine for renewal.</p> <p>&gt;Well it is too late to change the MRA but I will never understand the age change from 18 to 19. If you can vote and pay taxes at 18, why can't you stake a mineral claim? I find it funny that the change had to coincide with some age of moral majority (smoking/drinking). Is staking a claim a decision of moral judgement?</p> <p>&gt;You already asked these questions and I said that the course as described is stupid. Why ask if they are a good idea and then at the end of the survey point out that they are already in place? The Chamber already offers a prospector training course that is optional and that should be the avenue for prospectors to learn about engagement with stakeholders. Why change qualifying age from 18 to 19? What logic is there in that?</p>	No support for change in age from 18 to 19. Consider suggestion for regulation development
<b>Merit Based Tenure</b>		Do you support the changes to a merit-based tenure system? and WHY?		<p>&gt;It appears to be reasonable in terms of time and conversion to a lease. The system works aol would not change it until a flaw is recognized at which time an amendment can be instituted.</p> <p>&gt;A land lock up as proposed doesn't consider the limitations of junior explorers to raise fund on a seasonal basis for exploration. Instead it gives large companies the opportunity to lock up large tracts of land without demonstration of work activity toward developing an economic resource.</p>	no actual concerns identified for proposed changes. Consider support for proposed regulation
		Do you see a 30-year claim life as adequate time in order to work a claim enough to prove that there is a deposit that is economical to produce?		This is s philosophical question as every commodity requires a different timeframe in order to fully recognize its potential. Locking up land tenure for 30 years only ensures that the government gets to collect rent/assessment on the ground, without any potential resource discovery or development.	Consider support for the proposed regulation (Confirmed support for the proposed regulation)
<b>Evidence of Deposit</b>		Do you support the use of a prefeasibility study or technical equivalent (for privately held or small scale companies) for the submission of Evidence of Deposit?		No - The NI 43-101 technical reports as they now stand are sufficient for demonstrating work done on a property and recommendations for further developing the property. Note I said nothing about a deposit. It takes years to develop knowledge sufficient to demonstrate a deposit with reasonable prospects for eventual economic extraction. Your suggestions eliminate the early stage exploration work.	some miss conceptions and confusion identified in comments. Additional information needed to flesh out process.

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		If we set a technical equivalent to what is collected in a prefeasibility study, do have any suggestions on how companies could satisfy this requirement (e.g. - submission of reserve statement signed by a qualified person)?		<p>&gt;Even small/private companies should submit a PFS. A reserves statement would technically be Evidence of Deposit, it is not an indication of economic feasibility - an active mine will be held to the same standard, whether private or public - then Evidence of Deposit should meet the same standard as well.</p> <p>&gt;Submission of reserve estimate by a qualified person is a good idea, along with detailed geological context and some exploration of mining methods etc. Could follow the same format as a PFA, though some scaling for deposit size should be made.</p>	Consider suggestion for regulation development
Pro- duction Licence		Do you see any concerns with requiring a Production Licence for the sale of mineral? If yes - WHY?		>Royalties are a huge concern	Consider support for the proposed regulation
		Are there any additional requirements that you think should be added to a Production Licence? Please describe.		<p>&gt; the socio-economic agreement to include a commitment to green environmental practices...</p> <p>&gt;the long term royalty should not be 50:50 especially for diamond mines! Despite them taking the initial risk they are not equivalent to a government. When an adequate return has been made...government's share begins to rise beyond 50% and its maximum of 100% is when the mine is reclaimed. The slope would flatten nearing end of mine life.</p>	consider suggestions for implementation
Removal of Min- erals		What is a reasonable volume/tonnage/ dollar value or \$ of resource that could be adopted as a limit on the amount of minerals removed for a bulks sample?		<p>&gt;This really depends on the commodity, market conditions, etc., should require the input of professional geologist or engineer and be project specific. The expectation should be that the primary purpose is for testing legitimate engineering or geological features and not trying to circumvent regulations.</p> <p>&gt;the amount needed to determine the value of the deposit...metal deposits are easy, diamond bulk in the range of 10's of tonnes. Historical diamond bulk samples are public and can be used as a measure.</p> <p>&gt;30% for large scale ops, and 5% for small solo miners.</p>	Consider suggestion for regulation development

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		Are there elements of the required statistical returns that need to remain confidential during the prescribed period (15 years) and if yes what are these elements? If NO, why?		<p>&gt;It would really depend on what you are asking for in the Statistical Returns. Years ago (like back in the 1970s), some mining legislation asked for 'annual reports' which included a combination of items (kind of a mix of what is now called statistical returns as well as focused on jobs and other measures). As there are now other reporting mechanisms, hopefully the Statistical Returns will NOT duplicate what is captured under SEAs.</p> <p>Statistical Returns really might be of value in verifying royalties. If drawings of the mine workings are required as part of the Statistical Returns, as a way to assess and verify production numbers, then this kind of information should never be made public. No one need know the workings of a mine (just like the government would never publish details or architectural plans for major infrastructure). These could/would be un-necessary security risks.</p> <p>&gt;a private or publicly traded company, i.e., non-government, should not need to have another layer of reporting, especially information other regulatory bodies are responsible for...</p>	clarity needed in what is all included in a statistical return to coordinate reporting requirements. Consider for regulation development.
Legacy		Are there any anticipated regulatory changes that you think should be grandfathered for existing tenure or have all interest holders pushed into the new system?		<p>&gt;Existing tenure boundaries should remain as are, (see Nunavut transition to online staking), current production and royalty, benefit agreements, etc. need to be honoured. Existing mineral claims should be subject to the new regulations, allowing extensions to 30 years with adequate work, existing lease agreements must be honoured.</p> <p>&gt;I suspect explorers would want the current leases to continue as grandfathered under old legislation. But that potentially ties up some of the best mineral potential (currently most greenstone belts are monopolized by specific companies under leases which may not expire for decades). I think there should be an allowance for them to continue until their next expiry date (even though I know for some, that is 21 years away) and if the company cannot prove 'evidence of a deposit' on any existing lease, then they should expire and open for other explorers to be given a chance to explore (or the company can try to re-stake the land if they really want it back). I don't know if that is possible but the MRA fails to change anything if the same land that has been leased for the last 20 years continues on into perpetuity as leased because of grandfathered regulations.</p>	Quite varied opinion on legacy. Support for moving all claims MRA b/c of the advantages of longer time; mixed opinion on lease compliance b/c of current companies not working the land. Consider suggestion for regulation development

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
Online Map Staking		Do you support implementing a no-grid solution for online map staking over a predefined grid?	100% Yes		Consider support for grid decision on OMS
		What would be the best way to introduce an online map staking process?		<p>&gt;Through public engagement and training prior to go-live for OMS. Provide users with logins and validate that individuals are able to successfully apply for tenure prior to opening the system up for applications.</p> <p>&gt;Have the system set-up and ready to go, then introduce a transition period of say 30 days, preferably in a low season such as freeze-up (say Nov) then launch new system. Existing prospectors licenses should be renewed and online login information sent to their holders automatically with no need for another registration, this will ease the transition and avoid issues like those experienced in Nunavut. If a no-grid solution is implemented it should retain the 500m increment rules and orientations of the current ground system. Otherwise the map will be chaotic and boundaries can be hard to read.</p> <p>&gt;through a series of user guide videos.</p>	Consider for implementation
Zones		Can you think of any determining factors that could be considered when establishing the zone life duration?		<p>&gt;Duration should not exceed 5 yrs. The mineral industry/economy/environmental considerations evolve rapidly. 15 yrs. is many commodity cycles - not to mention technology cycles. Imagine if an area of the NT that was prospective for Lithium was in year 6 of limited access/development zone (or non-incentivised zone) - 9 more years of missed investment is less than ideal - 9 yrs. from now the Li market may be saturated, and that commodity opportunity will pass the NT by.</p> <p>&gt;Geological potential, costs of access, weather conditions and restrictions on operating seasons (high arctic for example), stage of exploration in a zone, etc.</p> <p>&gt;Keep it simple and without unnecessary restrictions. Interference by regulators never facilitates anything other than complications.</p>	Consider suggestion for regulation development after CIF (phase 2)
		What are your thoughts on prescribing size requirements for zone in the regulations?		<p>&gt;The minimum size should allow at least a full-sized claim.</p> <p>&gt;Size should be suitable to allow for modern exploration activities and district scale evaluations, zones can follow existing geological potential</p> <p>&gt;None. I don't see restriction the size helping the development process. There should be an arbitration mechanism where one party impedes the development similar to a Gold Commissioner who can arbitrate conflicts.</p>	Consider suggestion for regulation development after CIF (phase 2)

TOPIC	SUMMARY	QUESTION	SUPPORT	SUMMARY OF COMMENT RECEIVED	GNWT FOLLOW-UP
		What specific incentives would you find beneficial to be considered for a zone (e.g. reduction in work requirements)?		<p>&gt;Reduction in work requirements, reduction in cost of application to record, additional duration on mineral claims</p> <p>&gt;Graduated \$\$ support similar to MIP would encourage exploration. This would be better than reducing work requirements or extra credit for work done - we want to encourage \$\$ to be spent on the ground (develop a sustainable economy), not hold polygons in good standing on a map.</p> <p>&gt;No incentives other than the opportunity for discovery. Governments should concentrate on supplying infrastructure - both legal and physical.</p>	Consider suggestion for regulation development after CIF (phase 2)
	One type of incentive would give proponents an exclusive right to prospect in an identified area. In their current state, prospecting permits already follow different rules depending on latitude and allow proponents to complete regional scale reconnaissance to generate specific areas of interest With the move to online map staking, do you see the need for continuation of prospecting permits in the NWT?	If Yes, WHY?		<p>&gt;Would provide certainty to encourage regional exploration in under explored areas, however, life should be reduced slightly, or require that claims be staked at certain intervals, or portions be dropped</p> <p>&gt;Permits or notice should be the first step in filing work assessment to ensure tenure. Much prospecting entails little disturbance and should be allowed with notice and not a permit. Other advanced activities should be subject to reasonable permitting. These activities should have reasonable reclamation bonding and legal established permit approval times.</p>	Consider suggestion for regulation development after CIF (phase 2)
		If No, WHY?		<p>&gt;Prospecting permits allow(ed) mineral rights without the extreme cost of staking - map staking will enable this as well</p> <p>&gt;Because groups can move in to do first-year exploration on their claims during the exploration windows in NWT. Online staking means that they save a season in staking and can get after exploration in time and money right away. Much better for the government.</p>	



COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document	Page 8/29 Background	Economy	Support the economy of the NWT Would like to see this amended to provide greater emphasis on the importance of economic growth as an aspect of the document possible suggested wording: Support the economy of the NWT and encourage growth through responsible development.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions, Page 10/29	Regulation development process	Considerations should be made for lessons learned from operations of the old system to ensure greater efficiency and effectiveness of the new system. Would like to see some wording around this.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions, Pages 14-29	NOIW	I see a temporal guideline for submission of notice of intended work for a proponent, but no temporal guideline for a response by mining recorders office to proponent.
Anonymous	Overview of Policy Intentions- public document Socio-economic workshop	letter of concern to MCW	Benefits Enforcement	We were very disappointed to hear about some of the proposed changes, some as significant as imposing penalties that could be as extreme as revoking existing production permits and licences.
Anonymous	Overview of Policy Intentions- public document Socio-economic workshop	letter of concern to MCW	Benefits Legacy	Over the past year, we have been seeking guidance from the department on what arrangements are going to be put in place for the grandfathering of mines that have a current Socio-economic Agreement (SEA), so that existing contractual arrangements are respected. Gahcho Kué's SEA was negotiated and agreed upon by both the GNWT and De Beers for the life of mine. To date, we have not received any confirmation or insight into the department's position for grandfathering. It is our position that the SEA represents a contractual partnership between De Beers and the GNWT, a partnership that requires both parties to contribute to the successful implementation and enables the delivery of regional benefits. We are concerned with the proposed redesign. As we understand it, the proposed re-design puts the onus to deliver on the commitments entirely on De Beers, whereby the implementation involves many interdependencies involving, and requires inputs and deliverables, from both parties. These interdependencies and partnership are not evident to us in the proposed re-design and appear to fail to consider the negotiated position as set out in the SEA. This does not appear to us to be a fair or equitable position on the part of the GNWT.
Anonymous	Overview of Policy Intentions- public document Socio-economic workshop	letter of concern to MCW	Benefits	It is importation to note that there are several recommendations within the redesign proposal that we do fully support such as increased collaboration, and the development of implementation plans with key deliverables by all parties. We do not feel that a redesign is necessary to implement these recommendations, as the current SEA already supports and facilitates this approach, hence why it should be grandfathered.

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document	letter of concern to Premier	Regulation Development Process	The draft regulations to be made under this act will have serious negative effects on future mining investment in the North-west Territories..... should have additional time for consideration.....
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Tenure	THEREFORE BE IT RESOLVED THAT the NWTAC request that the GNWT ensure the staking of claims not be allowed to take place without the approval of the municipality.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Tenure	It should also be made clear that the activities in question must comply with the local zoning and land use plans or other planning tools that may be used by the community government.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	NAR implementa- tion	We believe that community governments should at the very least receive notice in-line with IGO's where the claim is within community boundaries or impacts on major infrastructure outside of the community boundaries for the various processes in the regulation and have the opportunity to provide non-binding comment.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Benefits	While the IGO's should lead the negotiation of the Socio Economic Agreements, they should be encouraged to include the community government (if not an IGO) in the negotiation
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	General	Regulation development process	Thank you for inviting us to the MRAR Regulator Engagement Session (Session) that was held on January 12. We found it quite informative, and it helped address some of the questions that we had. We thought we would follow up with this email to re-iterate some of the topics and questions that we had discussed:
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	General	Implementa- tion Notifications	A notification process to alert the LWBs about the suspension, cancellation, or expiration of an authorization would be helpful and would address subsection 26(7) of the Mackenzie Valley Land Use Regulations. It sounds like the Inspectors are already being notified and making sure that companies are not working on those claims or leases that are no longer valid, which is important.
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	General	Enforcement	There was a commitment from ITI to follow up with us on the specific questions of what happens when a mineral claim or lease is suspended or cancelled; that is, the need for a closure plan (from a LWB authorization) to still be fulfilled.

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	General	Engagement	We believe it will be important to integrate LWB Engagement Guidelines with MRA requirements where appropriate, so please keep reaching out as those details and processes are being developed (e.g., what happens if ITI receives a please do not issue from an IG within those 30 days, how does that affect timelines and next steps for both of our processes).
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	General	Consultations	We touched on the possibility of government consultation (with IGs) prior to the issuance of mineral claims and leases, similar to what is done for other authorizations that the GNWT issues (e.g., quarry permits and leases, and timber cutting permits and licences).
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	General	Consultations Engagement Notifications	We believe it is very important to clearly differentiate when steps are involving notification vs. engagement vs. Crown consultation.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	transition	Compared to the current regulations, the new Mineral Resources Act requires an order of magnitude larger amount of regulations be created, and in a wider range of areas. - The regulations being proposed also depart significantly from the well-known temporal system, to a new and untested merit-based land tenure system.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Benefits	The regulations propose new concepts that we believe will do significant damage to your minerals industry. One alarming example comes under the new requirement for benefit agreements, specifically the notion to attach penalties for failure to meet socio-economic commitments. Clearly, success in this area does not lie with industry alone, but with governments and communities too, and punishing industry would be short sighted.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Benefits	Additionally, our members continue to warn that putting socio-economic benefit agreements is not required in other jurisdictions that we must compete with; it is also a fading practice as companies work more closely on equity partnerships.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Economy OMS	We would also observe that the regulations unfortunately do not contain any commitments to online map staking, something which our members say would be the single largest game changer for exploration investment in this costly jurisdiction.

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Economy OMS	Noticeably absent is the one factor that our members say will be a positive game changer to turn around 15 years of ailing exploration investment – map staking. Other jurisdictions in Canada, including Nunavut, have made the switch to computer based claims acquisition, reducing the exorbitant costs of doing it by hand on the ground, costs which do nothing to advance actual mineral exploration. The NWT is already a very costly jurisdiction and this adds unnecessary additional costs that so many competing jurisdictions no longer require of investors. It can also make working with Indigenous communities much easier. Related to this is the archaic and unnecessarily costly requirement to survey mineral claims using traditional, 100-year old methods of line cutting and measuring boundaries in order to bring them to lease. Satellite coordinates, global positioning technologies, and map staking would also be able to eliminate this cost as well.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Benefits Enforcement	Requiring benefit agreements is a requirement that most competing jurisdictions don't have, so need to be reconsidered for their application in the North. Additionally, there is potential conflict and burden if they go beyond what a proponent commits to in the quasi-judicial MVRMA process that require benefits be assessed. This will likely be reinforced through the new requirement for development certificates under that legislation. There is an alarming concept being proposed to add penalties to companies for not meeting socio-economic commitments. This does not make sense, and frankly, is unfair to industry. There are four parties that are key to influencing success in creating socio-economic benefits: companies who provide employment and business opportunities, public governments that contribute to labour and business capacity through education, training and business support; Indigenous governments who increasingly are doing similar to public governments; and communities, who can work to improve and advance their own residents to seek opportunities. Rather than penalties, success will lie with the creation of a socio-economic program in which all the parties mentioned are pulling together. Such penalties have no place in the regulations.

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Regulation Development Process	Finally, we are concerned that with such a complex process and the short time available until this elected Assembly is wound down, there will be undue pressure brought to bear to push all the regulations to completion without adequate care required. We urge you to not push these prematurely into law; rather continue with your methodical approach, and including and deleting important portions, including those described above. The creation of these first ever, made-in-the-NWT mining regulations is a monumental undertaking. We believe these are likely the largest package of regulations ever to be created under any GNWT Act. They have the potential to affect positively – but negatively too – the most important contributor to the NWT economy, the minerals industry. It must be done right. Many of us recall another significant set of regulations, those created under the Wildlife Act. They took the GNWT approximately 10 years to be finalized, before finally allowing that Act to become law. We would urge similar diligence by not rushing the process on the NWT Mining Regulations, making it fulsome and complete, in order to encourage stronger exploration and mining investment in the NWT, and consequent strong benefits to our residents, businesses and governments.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Confidentiality	Concerns: short timelines (e.g., three years) for public release of sensitive information;
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Regulatory Efficiency	- duplication of effort and overlap with existing regulatory requirements;
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Legacy	- the need for appropriate grandfathering of existing interests
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	EDTR	- the definition and assessment of proof of deposit;
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Benefits	- insertion of the GNWT into the establishment of Benefit Agreements between proponents and Indigenous governments and organizations;
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Benefits - thresholds	- extremely low thresholds for triggering the need for a Socioeconomic Agreement;
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Benefits - material change	- the definition and application of material change with respect to Socioeconomic Agreements;
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Benefits - enforcement/ Production licences	- the possible introduction of penalties associated with Socioeconomic Agreements and Production Licences; and
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	Royalties	- changes to the resource royalties system.

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	regulation development process	MPVD believes it is critical that the GNWT provide the draft regulations for public comment well in advance of their anticipated publication in the North-west Territories Gazette as the potential impacts on industry, and ultimately on the potential for investment in the NT, will vary drastically depending on exactly how the intentions are written into and codified in the regulations. This is of particular importance with respect to how existing interests will be considered by the regulations, requirements related to establishing proof of deposit, the definition and application of material change with respect to Benefit and Socioeconomic Agreements, the possible introduction of penalties associated with Production Licences, and changes to the Resource Royalties system. In short, it is simply not possible to understand the potential implications of the regulations from (and provide an appropriate level of feedback based on) the very high-level outline of intent provided in the Overview: The GNWT must provide an opportunity for public review of the specific proposed language of the regulations to help ensure they serve, rather than hinder, the interests of the NT.
Anonymous	Overview of Policy Intentions- public document	Overview of Policy Intentions	regulation development process	More generally, MPVD is concerned that the GNWT is rushing the establishment and implementation of the Mineral Resources Act Regulations. Given the importance of the regulations to the future of investment in mineral exploration and extraction in the NT, MPVD believes it is extremely important that the GNWT take adequate time to engage on the regulations to ensure they are appropriate and best serve the interests of the NT and its citizens rather than rushing them through the current legislative assembly.
Anonymous	Overview of Policy Intentions- public document Socio-economic workshop	letter of concern to MCW	Benefits Legacy	However, it is our position that the current SEA is more than sufficient for their implementation. The current SEA was signed by both the Ekati Mine and the GNWT in 1996 explicitly stating that the agreement would exist for the life of mine. It is therefore our expectation that the current SEA be grandfathered in if the redesign is to proceed.
Anonymous	Overview of Policy Intentions- public document		Regulation development process	NZC supports the development of Acts and Regulations that reflect a clear and efficient process and looks forward to reviewing and providing more detailed comments on the Regulations when they are available.

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document		Regulation development process	In the drafting of the regulations, NZC requests continued engagement with the Government of the Northwest Territories (GNWT) and the Intergovernmental Council (IGC) and consideration of the impacts and burden the Regulations will put on the NZC and the Northwest Territories mining industry. The comments included below highlight the key areas of NZC's concern based on a review of the Policy Intentions Paper and that NZC believes require further engagement before a draft of the Regulation can be completed.
Anonymous	Overview of Policy Intentions- public document		Tenure	Increased Regulatory Burden and Administrative Effort - The recently released Critical Minerals Strategy includes a commitment from the Federal Government to support streamlining regulatory process whereas the Policy Intentions Paper includes additional regulatory requirements and administrative burdens (applications, notifications, reporting). The Policy Intentions Paper is not aligned with the Critical Minerals Strategy. - The Policy Intention Paper includes additional submissions, notifications and reporting that may result in schedule and project delays. The impacts of these timelines and requirements have not been clearly outlined and will require further review.
Anonymous	Overview of Policy Intentions- public document		Benefit Agree- ments Production Licences	Benefit Agreements - The Policy Intentions Paper discusses a new requirement to have Benefit Agreements and links these agreements to another new requirement, the Production Licence. This is a duplication of efforts as Benefit Agreements are negotiated between a company and an Indigenous Government. The MRA should not interfere with the current process for the establishment of Benefit Agreements.
Anonymous	Overview of Policy Intentions- public document		Benefits Agreements Material Change legacy	A definition of material change is not included in the Policy Intention Paper which may have significant impacts to NZC. Therefore, companies with existing Benefit Agreements will need to be grandfathered into the MRA.
Anonymous	Overview of Policy Intentions- public document		Legacy Material Change SEA	Socio-Economic Agreements - A definition of material change is not included in the Policy Intention Paper which may have significant impacts to NZC. Therefore, companies with existing Socio-Economic Agreements will need to be grandfathered into the MRA.



COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document		Legacy Production Licence SEA	The Policy Intention Paper discusses potential penalties if a company does not complete a renegotiation of dispute resolution of a SEA in a specified timeline. This may include the suspension and cancellation of a production licence which is not in line with a collaborative approach and not only impacts a company's ability to operate, but as a result will impact the benefits already flowing through Benefit Agreements and to the Northwest Territories.
Anonymous	Overview of Policy Intentions- public document		Regulatory efficiency	Recommendations include: -Reducing regulatory duplication with the current regulatory process
Anonymous	Overview of Policy Intentions- public document		Notifications Reporting	- Reducing administrative requirements such as notifications and reporting
Anonymous	Overview of Policy Intentions- public document		Regulation development process	- Continued engagement with mining industry in advance of drafting the Mineral Resources Act and Regulations
Anonymous	Overview of Policy Intentions- public document		Regulatory efficiency	- Alignment with Critical Minerals Strategy, including regulatory process efficiencies and simplification
Anonymous	Overview of Policy Intentions- public document		Benefits Legacy	- Include a provision for grandfathering of current projects with SEAs and Benefit Agreements
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Claims pg 4	Consultations Notifications	The first sentence says engagement while the second says notification. Which is it intended to be? If the right is issued without consultation or even engagement by the GNWT, it does not seem that the Indigenous ppl of that region have any say or choice in the matter.
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations	The MRA What We Heard Report states: Several participants from Indigenous governments and organizations and the public commented that no recording of any mineral claim should be allowed until after engagement has occurred...does this notification step accomplish that?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023			
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Engagement Notifications	Further, how has the GNWT considered the UN Declaration's on the Rights of Indigenous People and specifically Article 32(2): States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Engagement Notifications	their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources in the development of these regulations and the requirements for notification vs. engagement vs. consultation?

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Leases pg 4	Capacity	- How is the issue of capacity of Indigenous governments being addressed with these additional engagement/notification steps? (Noting that the What We Heard Report states that: Both Indigenous governments and organizations and the public often commented on the need for capacity development and funding to support engagement and
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Engagement Notifications	consultation on the MRA and mineral projects.)
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Engagement Notifications	- Are the new engagement/ notification steps in the Claim section and this new notification step in the Lease section considered by the GNWT to be part of their consultation process?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations	- How will those engagement and consultation processes feed into the regulatory process?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Mineral Rights Review pg 5	MRRB	Will local representation be required? Indigenous representation? Gender-balanced representation?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Intergovernmental Council of the NWT pg 9	Regulation development process	Has the IGC approved this document?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Public Engagement pg 9	transparency	How will the Regulations accomplish greater transparency?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		transparency	Where can people access these? (key theme in next section is greater transparency)
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		transparency	The Act should...ensure adequate financial assurance for mine closure.
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023			The MVRMA already provides a framework for financial security. What is missing from the MVRMA framework that the MRA can cover?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023			
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Regulatory efficiency Transition	If the LWBs are setting security based on an open and transparent process, how will the GNWT ensure it is participating sufficiently in the process to be able to provide the necessary expertise to the LWBs if it has an ability to change the amount of security after the Board decides on it.

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Any engagement that has been completed on the MRA's Regulations, a period of consultation will need to be completed before they can be finalized pg 10	Regulation development process	What is the current plan/timeline for future consultation?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Engagement	As per Tlicho Agreement 22.3.15: Before enacting legislation regulating the use of land or water or the deposit of waste that
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Engagement	applies to any part of Wek'èezhii or Mòwhi Gogha Dè Nîitâèè (NWT) or any amendments to such legislation, government, including any community government, shall consult with the Tâichô Government in relation to its application in Mòwhi Gogha Dè
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Engagement	Nîitâèè (NWT) and the Wek'èezhii Land and Water Board in relation to its application in
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Engagement	Wek'èezhii. Before giving any policy direction to the Board or enacting any laws, in
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Engagement	respect of the use of Tâichô lands, the Tâichô Government shall consult with government and the Board. Before giving any policy direction to the Board, the Minister shall consult with the Tâichô Government and the Board.
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Regulation development process	The engagement session planned for January 12 with the LWBs was unilateral notice given on very short notice with limited details. The LWBs expect and would appreciate more collaborative planning for future engagement and consultation meetings on this matter.
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	The public will be able to access information on staked claims by identifying the areas in which they are interested; and the view active and pending mineral tenure online pg 13	NAR	How will public know there is a new claim, will there be a subscription feature where public is notified?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Disputes for Recorded Claims pg 13	claim	The steps go immediately from Application to Record to Disputes for Recorded Claims....does that mean that the claim is automatically issued after the 30-day dialogue period with IGs?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Notifications	Does this situation fall under subsection 26(7) of the MVLUR?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Disputes for Recorded Claims pg13	claim	- Can an application for a claim be denied?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Consultations Notifications	- Does the GNWT do any consultation during this 30-day dialogue period?

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Disputes for Recorded Claims pg 13	staking disputes	Does this situation fall under subsection 26(7) of the MVLUR?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Deputes for Recorded Claims pg 13	staking disputes	Is there an appeal process?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Documented evidence of engagement expenditures where the claimholder conducted eligible engage- ment activities as defined by policy. pg 14	Engagement	As defined by what policy? Policy that is developed by the IG(s)?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Grouping and Transfer of claims pg 15	Consultations Engagement Notifications	Before a transfer happens, will the GNWT or the new corporation conduct any consultation/engagement?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Lease Applications pg 17	Consultations Engagement Notifications	No engagement or consultation by the applicant or the GNWT for leases?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	A targeted dialogue pg 17	Notifications	What is the timeline for this targeted dialogue?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Qualifications for Board Members pg 19	MRRB	Requirements to be gender-balanced?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Transfer of a production licence pg 21	Consultations	Before a transfer happens, will the GNWT or the new corporation conduct any consultation/engagement?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Operation of the Board pg 22	MRRB	Indigenous representative from area where decision is required? (e.g. Tliche Agreement requires Surface Rights Board member to be from Monfwi if decision is required for Tliche Lands).
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		MRRB	Requirements (similar to Surface Rights Board) to be resident of NWT?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023		Regulation development process	How will the Board ensure gender-balance?
Anonymous	Overview of Policy Intentions- public document Regulator engagement - Jan 2023	Proposed Regulations under the Mineral Resources Act pg 24	Regulation development process	It would be helpful if the table summarized and compared (between current and proposed regs) the times when IGs and the public are notified, engaged, and consulted.
Anonymous	Overview of Policy Intentions- public document	general	Regulation development process	Soliciting feedback from stakeholders, including the NWT mining industry, on the policy intentions that will guide the drafting of regulations for the NWT Mineral Resources Act is good. However, it would have been more helpful to have this solicitation at the beginning of this regulatory development process instead of at the end.

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions-public document	general	Benefits Economy	The policy intentions provided in the GNWT document focus on how the GNWT will regulate mining explorers and developers. On the one hand, this is fine and expected. However, the policy intentions are lacking in support of the stated goal of underpinning the economy of the NWT. While requiring proponents to provide benefits to impacted Indigenous governments and organizations and to the NWT as a whole, there seems to be a lack of effort made by the GNWT to commit to creating the economic conditions that would help proponents attract investment that would increase the desired benefits to the NWT from mining development projects and operating mines.
Anonymous	Overview of Policy Intentions-public document	claim	Prospectors Awareness Course	1. Could the Prospector's Awareness Course be available on-line?
Anonymous	Overview of Policy Intentions-public document	claim	Staking Disputes	2. With respect to disputing a recorded claim, will there be a comprehensive description required that articulates the reasons for the dispute by the complainant? If not why not?
Anonymous	Overview of Policy Intentions-public document	claim	OMS	3. With respect to MAARS, when does the GNWT expect to implement this on-line system? What is your estimate of the timeline to deliver the online system?
Anonymous	Overview of Policy Intentions-public document	lease	EDTR	1. With respect to the Evidence of Deposit Technical Report, the GNWT paper states that the Evidence of Deposit will use the development stage of a standard pre-feasibility study as key eligibility criteria for a lease and as the basis of its evidence of deposit. Why is a pre-feasibility study the standard? Evidence of a deposit is a Mineral Resource Estimate. A Preliminary Economic Assessment is based on an Inferred Mineral Resource that is evidence of deposit and of economic merit. Why not use PEA's as evidence of an economic deposit?
Anonymous	Overview of Policy Intentions-public document	lease	Notifications	2. How will the targeted dialogue that will be required when the GNWT receives feedback on a lease approval notification be managed? Will there be prescribed timeframes for completing this process and what are the responsibilities of the proponent?
Anonymous	Overview of Policy Intentions-public document	lease	Lease rates	3. Will lease renewal rates be published annually?
Anonymous	Overview of Policy Intentions-public document	benefits	Material change	1. What definition will be used to determine when a material change to a project occurs? Given the real impact on the proponent, Indigenous governments, communities and the GNWT, a reasonable and transparent definition is required.
Anonymous	Overview of Policy Intentions-public document	benefits	Benefits Dispute Resolution	2. For the Dispute Resolution Board and its panels, would members who reside in an area or region where a dispute is taking place, participate in the dispute resolution process?

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document	benefits	SEA	3. With respect to SEA's, eliminating Socio-Economic Agreements (SEA's) would be a significant help for investors to see clarity on shorter project timelines (Time is money for them!). This is at a time when governments at provincial, national, and international levels want to develop critical mineral projects to meet decarbonization objectives. It is now considered a National Security issue for the United States, and this was discussed at the Vancouver Resource Investment Conference (VRIC) that followed the AME conference last week in Vancouver.
Anonymous	Overview of Policy Intentions- public document	benefits	Reporting SEA	Developers are not opposed to reporting on the activities one might find in a SEA. In fact, including the requirement in regulatory permits for developers to report on these activities would probably not be opposed.
Anonymous	Overview of Policy Intentions- public document	benefits	Economy SEA targets	It is submitted, however, with regard to labour percentage quotas, the GNWT cannot guarantee sufficient availability of human resources in the NWT labour pools or contractor capacity since they are already stretched by current demand from the mining industry.
Anonymous	Overview of Policy Intentions- public document	benefits	Economy Enforcement SEA	The GNWT has suggested imposing penalties, including cancelling approved permits/production licences. The GNWT should seriously consider its competitive position to attract mining investment versus other Canadian and global jurisdictions. Continuing down a path where GNWT SEA's are a duplicate of IBA's and considering the imposition of penalties, up to and including shuttering the mining operation, does not make the NWT an attractive jurisdiction to invest in.
Anonymous	Overview of Policy Intentions- public document	benefits	Economy Regulatory efficiency	Rather, the GNWT should look at streamlining the regulatory process it controls and position the territory as an attractive jurisdiction to invest in. With the generational opportunity on the horizon associated with critical minerals to be used to meet global decarbonization objectives. A Supercycle is forecasted in the critical mineral mining industry. An industry that is the largest contributor to the NWT GDP. The global decarbonization objectives are set for 2030 and 2050. With the timeline it takes to deliver projects, that is TOMORROW!

COMMENT FROM	REFERENCED DOCUMENT / ENGAGEMENT	PAGE/SECTION/ IDENTIFIER/QUESTION	CATEGORY	COMMENT
Anonymous	Overview of Policy Intentions- public document	benefits	Economy Enforcement SEA	If the GNWT is intent on continuing with SEA's, ideally there should be some balance to the policy intentions by requiring the GNWT to create the economic conditions so that professionals and blue-collar workers, along with contractor availability are at appropriate levels to meet SEA targets. Given that this has not been the case, especially with respect to labour, for many years, penalties contemplating suspension or loss of a production licence are unreasonable and will only drive investment to other Canadian and global jurisdictions.
Anonymous	Overview of Policy Intentions- public document	benefits	SEA	4. Why is it only the mineral leaseholder's responsibility to completely renegotiate a SEA? Why is it not the responsibility of both the mineral leaseholder and the GNWT?
Anonymous	Overview of Policy Intentions- public document	Production Licences	Production Licence	1. The assumption is that prior to applying for a production license, the proponent will have completed the EA process and obtained the appropriate licenses and permits (e.g Water License and Land Use Permit). A proponent will not be able to complete the EA process, in all practical terms without, completing Benefit Agreements with impacted Indigenous governments and a SEA with the GNWT. If this is the case, what is the rationale for GNWT taking 45 days to review an application for a production license for completeness? 45 days can be up to approximately \$5 million in lost Net Present Value to the proponent. Why is 20 days not a reasonable timeframe for this review?
Anonymous	Overview of Policy Intentions- public document	Production Licences	Confidentiality	2. The GNWT will need to consider the implication of the timing of the release of the reporting of production data from those proponents who are public companies, especially if the production data is material. Will the GNWT commit to working with proponents to ensure that their obligations are met to the GNWT, the appropriate securities commissions, and shareholders?
Anonymous	Overview of Policy Intentions- public document	Production Licences	Benefits Enforcement	3. What specific circumstances would lead the Minister to revoke a production license at his/her discretion? These circumstances should be transparent and known to all and should be public so that investors have certainty.
Anonymous	Overview of Policy Intentions- public document	MRRB	MRRB	1. Will the GNWT fund the operations of this board?
Anonymous	Overview of Policy Intentions- public document	MRRB	MRRB	2. It is stated that the MRRB will create their own rules and procedures. Will the GNWT provide the MRRB with a mandate and define the limits of its jurisdiction?



DATE	HOURS	MEETING TYPE	WHO	TITLE & PURPOSE
03-29-22	1	Regulators	Meet with MVEIRB	Merit Based Tenure Changes and separating Impacts and Benefits - introduction
03-31-22	0.2	Regulators	Public Form	Overview of MRAR
05-04-22	1.5	Other (Public Interest Group )	Alternative North members	Royalties questions and information sharing
06-09-22	1	Other (Public Interest Group )	Alternative North members	MRAR general questions and information sharing
12-13-22	N/A	Other (Public Interest Group )	All of Public via Announcement	Public Engagement on Overview of Policy Intentions - engagement open
12-19-22	1	Other (Public Interest Group )	Alternative North representative	concerns discussed with Minister regarding: Environmental Baseline Studies being not included in MRA exploration work requirements
01-12-23	7.5	Regulators/IGCS	Open to all self identified Regulators: CIRNAC, CIRNAC - MRO, GNWT various, Environment Canada, GLUPB, MVEIRB, WLWB, WRRB, SSI, TG, NWTNM, GTC, YKDFN	Agenda Topics: - Merit Based Regulatory System - Prospectors Awareness Course - Staking Disputes - Claims - Surveys - Evidence of Deposit - Leases - NWT Benefits - Production Licence - Statistical Returns - Drill Cores - Removal of Mineral - Legacy - Mineral Rights Review Board - Enforcement - Royalties
01-19-23	1	Other (Public Interest Group )	Alternative North members	Benefits Related to Public Engagement Material
01-26-23	N/A	Other (Public Interest Group )	Alternative North	Email Questions Regarding staking mineral claims within Municipalities; and compliance with Land use Plans





*Mineral Resource Act –  
Regulation Development*

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