



February 27, 2025

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Re: RECLAIM V8.0 Comment Deadline

Dear Spencer, Andrew and Bill,

The NWT & Nunavut Chamber of Mines (the “Chamber”) is the voice of the Northern mining and exploration industry and has been advocating for a healthy northern mineral sector since 1967. The Chamber’s primary objective is to encourage, assist and stimulate environmentally responsible, prosperous, and orderly development and growth of mining and mineral exploration in the NWT and Nunavut.

Chamber members at the engagement session in Vancouver understood that the RECLAIM V8 team would provide detailed information on their model to support the changes noted by our members. The detailed information was the rationale to support the proposed changes shown in RECLAIM V8 including but not be limited to a jurisdictional scan, evidence from northern sites to support the costs, and the various unit cost reference materials

The supporting materials posted on February 19, 2025, include reference material for unit costs and a memo containing supplementary information, the latter of which referenced the governments’ review process, rationale and a March 2020 discussion paper *Review of Mine Financial Security Estimates and RECLAIM*.

The Chamber represents the mineral exploration and mining sector, which is the primary industry impacted by the proposed changes. As noted in the Vancouver engagement, these changes require significant time for detailed review and further dialogue.

The Chamber respectfully requests a 4-month review period (including potential options for a workshop) to fulfill the first step in the review process. We would also ask for access to the *Review of Mine Financial Security Estimates* dated March 2020 at your earliest convenience.

Should there be difficulties in providing the above-noted information, the Chamber will require an extension until January 31, 2026 as the summer field season will make it difficult to provide feedback.

The Chamber looks forward to ongoing robust conversations on changes to RECLAIM V8. As an industry, we remain seriously concerned with ensuring continued investment in the two territories, and we need to ensure we get this right.

Respectfully submitted,

Karen D. Costello

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Executive Director