

ERO Number 019-6692

Attention: Sophie Fortin; Email: sophie.fortin@ontario.ca

April 6, 2023

Dear Ms. Fortin:

Thank you to the Ministry of Mines for finally posting the proposed Hobby Mineral Collecting Guide on the Environmental Registry, and providing the opportunity for interested parties to comment, particularly those of us who are enthusiastic mineral collectors. The mineral collecting community has been waiting for this document for many years!

Mineral collecting is a hobby that is enjoyed by many Ontarians and non-Ontarians. Therefore, it is important that the final version of the Policy gets it right. The current proposed Guide has many omissions compared to the Mineral Collecting Policy issued in the 1990s by The Honorable Chris Hodgson, Minister of Northern Development and Mines, and the subsequent draft Hobby Mineral Collecting, Policy: L.P. 701-1, reviewed by the Central Canadian Federation of Mineralogical Societies (CCFMS) in 2014. I would like to bring these omissions to your attention and suggest changes that need to be addressed, and incorporated into the final version of the current document.

Guide vs. Policy

The 1990s *Mineral Collecting in Ontario* booklet (page 1, paragraph 3) indicates that a 'Mineral Collecting Policy' has been developed. The Hobby Mineral Collecting Policy: L.P. 701-1, Date Amended: June XX, 2014 clearly calls the guidance for mineral collectors a 'Policy'. The name of current proposed Hobby Mineral Collecting Guide should be changed to Hobby Mineral Collecting Policy.

Southern Ontario Lands Withdrawn From Staking

The Hobby Mineral Collecting document Policy: L.P. 701-1, Date Amended: June XX, 2014 clearly states that the parts of Southern Ontario that were withdrawn from staking because the surface rights were privately held would be made available for hobby mineral collecting provided the mineral collector obtained permission from the surface rights owner. This section has been entirely omitted from the current proposed Guide and must be included as part of the new document.

Southern Ontario has numerous mineral collecting sites that are important to local communities, particularly Bancroft and Haliburton, for their economic activity.

Mineral Collecting Rights

Page 4 of the draft Guide posted on the Environmental Registry states that "In general, hobby mineral collecting cannot be done on lands where the mining rights are not open for mining claim registration". This statement must be clarified as it is ambiguous and confusing, particularly to the general public.

The Policy must clearly indicate that hobby mineral collecting can be carried out on claimed land, leased land, patented land, and surface rights patents provided permission of the landowner is obtained.

The Policy must clearly state that permission is not required to collect on Crown land if it is open for staking, there is no existing claim on it, and no-one owns the surface rights. This clause must be added.

Fossil Collecting and Panning

The draft Guide fails to mention fossil collecting and panning for gold or other heavy minerals. These activities are considered mineral collecting activities and must be added to the Policy.

Power Tools and Hand Tools

The Policy must add small portable power diamond saws as allowable tools for mineral collecting.

The Policy must clearly state that a hammer must be a geological hammer. Using a regular hammer (i.e., carpenter's hammer) is dangerous as pieces may splinter off.

Selling of Mineral and Fossil Specimens

The Policy must clearly state that mineral and fossil specimens collected under the guidelines outlined in the Policy can be sold on a small, non-commercial scale between mineral and fossil collectors. The way the current Guide is written, mineral and fossil collectors who are not dealers and who do not have commercial operations are not allowed to sell mineral and fossil specimens among themselves.

More Comprehensive Information

The current Guide puts the onus on the hobby mineral collector to determine the status of land, how to obtain permission to collect on certain designated lands, etc. However, there is no information on how to do this. The Policy must include a comprehensive section "Where to Find Information." not just the general Ministry of Mines' phone number and its mailing address.

Jurisdiction of Other Ontario Government Ministries

The Guide provides information that other provincial Ministries have jurisdiction on where hobby mineral collecting can be done. The Guide fails to indicate that the Ministry of Transportation has restrictions on hobby mineral collecting along provincial highways. The Guide also fails to mention that there are federal restrictions on hobby mineral collecting in National Parks. A brief summary of these restrictions must be included in the Policy to bring them to the attention of the hobby mineral collector.

Hobby Mineral Collecting Open to Non-Ontario Residents

The Policy must clearly state that someone does not have to be a resident of Ontario to legally be a hobby mineral collector in Ontario provided all of the guidelines outlined in the Policy are followed.

Thank you for the opportunity to provide input into this very important Hobby Mineral Collecting Policy. I look forward to seeing a final version of the Policy prior to the summer 2023 field collecting season.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ed Debicki', written in a cursive style.

Ed Debicki
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