

TABLE OF CONTENTS

<i>Introduction</i>	v
<i>Table of Cases</i>	Cases-i
 Chapter 1: Mineral Property Interests	
1.1 Introduction	1-1
1.2 Preliminary Licensing	1-2
1.3 Exploration Licences.....	1-2
1.4 Mineral Claims.....	1-3
1.5 Mining Leases	1-4
1.6 Option Agreements.....	1-5
1.7 Canadian Resource Property and Foreign Resource Property — Definitions	1-6
1.8 Royalties	1-11
1.9 Farm-Outs.....	1-14.1
1.9.1 Canada Revenue Agency Position.....	1-14.1
1.9.2 Case Law.....	1-18
1.9.3 Legal Analysis	1-18
1.9.4 Contractual Joint Ventures	1-21
1.9.5 Mining Option Agreements.....	1-22
1.10 Gold Loan.....	1-27
1.11 Offtake and Stream Transactions.....	1-28
 Chapter 2: Taxpayer Classification	
2.1 Introduction	2-1
2.2 Principal-Business Corporation.....	2-2
2.3 Partnership	2-5
2.4 Joint Venture.....	2-7
2.4.1 Single Undertaking or Limited Number of Undertakings	2-7
2.4.2 Contractual Intention	2-7
2.4.3 Tax Motivation is Irrelevant	2-8
2.4.4 Co-Ownership of Property and Participation in Costs and Revenues	2-9
2.4.5 Allocation of Revenues and Expenses — Not a Sharing of “Profit”	2-9
2.4.6 Income Tax Treatment for Joint Ventures	2-10
2.4.7 Joint Venture Agreements.....	2-11
2.4.8 The Mining Joint Venture (Canada & Australia)	2-11
2.4.9 Operator of a Mining Joint Venture	2-13

Table of Contents

2.5	Prospectors and Grubstakers	2-20
2.6	Traders or Dealers	2-22
2.7	Trusts and SIFTs.....	2-22
Chapter 3: Exploration and Development		
3.1	Introduction — Four Stages of a Mining Project	3-1
3.2	History of Deduction for Prospecting, Exploration, and Development Stage Expenses	3-2
3.3	Canadian Exploration Expense (“CEE”), Cumulative Canadian Exploration Expense (“CCEE”) Account, and Deduction	3-10.10
	3.3.1 Canadian Exploration Expense (“CEE”).....	3-10.10
	3.3.2 Economic Studies and the Purpose Test for CEE.....	3-19
	3.3.3 Cumulative Canadian Exploration Expense (“CCEE”) Account.....	3-21
	3.3.4 Deduction.....	3-24
3.4	Canadian Development Expense (“CDE”), Cumulative Canadian Development Expense (“CCDE”) Account, and Deduction.....	3-25
	3.4.1 Canadian Development Expense (“CDE”)	3-25
	3.4.2 Cumulative Canadian Development Expense (“CCDE”) Account.....	3-29
	3.4.3 Deduction.....	3-30
3.5	“Incurred”	3-31
3.6	Prepaid Expense	3-31
3.7	Borrowed Money Used for Exploration or Development	3-31
3.8	Carved-Out Production Payments.....	3-32
3.9	No Duplication.....	3-34
3.10	Short Taxation Years	3-34
3.11	Order of Deductions	3-34
3.12	SRED.....	3-35
Chapter 4: Capital Cost Allowance		
4.1	Introduction	4-1
4.2	General Concept.....	4-2
4.3	Classes Applicable	4-3
4.4	Before 1988	4-4
	4.4.1 Class 28.....	4-4
	4.4.2 Class 10.....	4-6
	4.4.3 Class 12.....	4-8
	4.4.4 Class 29.....	4-8
4.5	Rules After 1988 and Before March 21, 2013.....	4-8
	4.5.1 Class 41(a).....	4-8
	4.5.2 Class 41(a.1)	4-8
	4.5.3 Class 41(b).....	4-8.1

Table of Contents

	4.5.4 Class 43	4-8.1
	4.5.5 Custom Processing and Coal Mine Operator	4-8.1
	4.5.6 Oil Sands	4-8.2
	4.5.7 Production from a Mine	4-15
	4.5.8 Deemed Mine	4-15
4.6	Rules After March 20, 2013	4-15
	4.6.1 Class 41.2	4-17
	4.6.2 Eligible Mine Development Property for Class 41	4-17
	4.6.3 Other Definitions	4-18
	4.6.4 Consequential Amendments Pertaining to Class 41.2	4-19
	4.6.5 Zero Emission Vehicles	4-21
	4.6.6 Utilities Connections and Rights of Way	4-22
4.7	Ownership of Mineral Resource	4-22
4.8	Crown Property and Surface Construction	4-24
4.9	Half-Year Rule	4-24.1
4.10	Available-For-Use Rule	4-24.5
4.11	Planning	4-29
Chapter 5: Provincial Levies and the Resource Allowance		
5.1	Introduction — The Deduction for Mining Taxes	5-2
	5.1.1 1944 to 1948	5-3
	5.1.2 1949 to 1967	5-4
	5.1.3 1964-66 Royal Commission	5-5
	5.1.4 1971 Tax Reform	5-6
	5.1.5 1974 to 2003	5-6
	5.1.6 2003 Proposals	5-8
	5.1.7 Problem with Mining Taxes in 2003	5-9
	5.1.8 Solution: December 21, 2004 Amendment to Regulation 3900 to Allow Deduction for Mining Taxes	5-10
	5.1.9 Mining Royalties	5-12.1
5.2	The Resource Allowance	5-12.2
	5.2.1 Gross Resource Profits	5-12.3
	5.2.2 Resource Profits	5-13
	5.2.3 Adjusted Resource Profits	5-14
	5.2.4 Amount of Resource Allowance	5-15
	5.2.5 Resource Loss	5-16
5.3	Provincial Levies — Deductibility	5-16
	5.3.1 Statutory Provisions	5-16
	5.3.2 Definitions	5-18
	5.3.3 Paragraph 18(1)(m)	5-19
	5.3.4 Paragraph 12(1)(o)	5-20.1
	5.3.5 Dispositions to the Crown	5-21
	5.3.6 Acquisitions from the Crown	5-21

Table of Contents

5.3.7	Section 80.2	5-22
5.3.8	Part XII Tax	5-22
5.3.9	Remission Orders and Former Canada-U.S. Treaty	5-23
Chapter 6: Reclamation Funding		
6.1	Industry Background	6-1
6.2	Deductibility of Reclamation Costs Incurred	6-2
6.3	Non-Deductibility of Future Reclamation Estimate	6-4.3
6.4	Reclamation Trust Concept	6-5
6.5	Qualifying Environmental Trust Legislative Scheme.....	6-5
6.6	Future Reclamation in Asset Sale	6-11
	6.6.1 Introduction	6-11
	6.6.2 <i>Daishowa</i> – Before the Supreme Court’s Decision	6-11
	6.6.3 <i>Daishowa</i> – The Supreme Court’s Decision	6-16
	6.6.4 <i>Daishowa</i> – Further Implications on the Sale of an Operating Mine	6-17
	6.6.5 Payments other than on a Sale of an Operating Mine....	6-24
6.7	Qualifying Environmental Trust (QET) Limited Partnerships (LP).....	6-25
Chapter 7: Tax Rates and Tax Credits		
7.1	Introduction	7-1
7.2	2003 Federal Budget	7-2
7.3	Statutory Scheme for Rate Reductions.....	7-3
	7.3.1 General Rate Reduction	7-3
	7.3.2 Transitional Rate Reduction.....	7-4
7.4	Tax Credits.....	7-5
	7.4.1 Pre-Production Mining Expenses	7-5
	7.4.2 Scientific Research and Experimental Development ("SR&ED")	7-8
	7.4.3 Atlantic Region Expenses	7-9
Chapter 8: Sale of Mining Properties		
8.1	Introduction	8-1
8.2	History	8-2
8.3	Actual Sale	8-2
	8.3.1 Basic Rules	8-2
	8.3.1(a) Canadian Resource Property	8-2
	8.3.1(b) Foreign Resource Property	8-3
	8.3.1(c) Farm-out	8-4
	8.3.1(d) Carve-out	8-6
	8.3.1(e) Employee Royalty Interests	8-8

Table of Contents

8.3.2	Sale by Trader or Dealer	8-8
8.3.3	Transfer at Other than Fair Market Value.....	8-9
8.3.4	Transaction with the Crown	8-9
8.3.5	Distribution from a Trust or Estate	8-10
8.3.6	Expropriation of Resource Property	8-11
8.3.7	Contingent Consideration	8-12
	8.3.7(a) Canadian Resource Properties (CRPs).....	8-12
	8.3.7(b) Depreciable (Capital) Property.....	8-13
	8.3.7(c) Eligible Capital Properties (ECPs).....	8-15
	8.3.7(d) Other Capital Properties	8-16
	8.3.7(e) Allocations	8-16
8.4	Deemed Sale.....	8-17
	8.4.1 Death	8-17
	8.4.2 Ceasing to be Resident	8-18
	8.4.3 Non-Resident Ceasing to Carry on Business	8-18
	8.4.4 Deemed Carrying on Business.....	8-20
8.5	Withholding on Sale by Non-Resident.....	8-20
Chapter 9: Successor Rules		
9.1	Introduction	9-1
9.2	History	9-2
9.3	Definitions.....	9-3
9.4	Prerequisites	9-5
9.5	Expenses Carried Over.....	9-7
	9.5.1 Cumulative Canadian Exploration Expense (“CCEE”)... ..	9-7
	9.5.2 Cumulative Canadian Development Expense (“CCDE”) ..	9-8
	9.5.3 Foreign Exploration and Development Expense (“FEDE”) ..	9-8
	and Cumulative Foreign Resource Expense (“CFRE”) .	9-8
	9.5.4 Original Owner and Predecessor Owner	9-9
	9.5.5 Order of Deduction	9-13
9.6	Qualifying Income	9-13
	9.6.1 Cumulative Canadian Exploration Expense (“CCEE”)... ..	9-13
	9.6.2 Cumulative Canadian Development Expense (“CCDE”) ..	9-14.2
	9.6.3 Foreign Exploration and Development Expense (“FEDE”) ..	9-14.2
	and Foreign Resource Expense (“FRE”).....	9-14.2
9.7	Acquisition of Control.....	9-17
9.8	Anti-Avoidance	9-20
9.9	Partnership — Selected Points	9-21
Chapter 10: Corporate Reorganizations		
10.1	Introduction	10-1
10.2	Rollover Concept.....	10-2
10.3	Section 85 Rollovers	10-2

Table of Contents

	10.3.1 Subsection 85(1)	10-2
	10.3.2 Subsection 85(2)	10-4
	10.3.3 General Rules	10-4
	10.3.3(a) Key Conditions	10-4
	10.3.3(b) Elected Amount	10-5
	10.3.3(c) Miscellaneous Considerations	10-7
10.4	Share For Share Exchange	10-7
10.5	Amalgamation	10-8
10.6	Liquidation	10-10
	10.6.1 Subsection 88(1) Wind-Up	10-10
	10.6.2 88(1)(d) Bump & Partnerships	10-11
	10.6.3 Taxable Liquidations	10-14.6
10.7	Divisive Reorganization (Butterfly)	10-14.6
10.8	Change of Control	10-14.8
	10.8.1 Taxation Year-End	10-14.10
	10.8.2 Non-Capital Losses	10-14.11
	10.8.3 Capital Losses	10-16
	10.8.4 Depreciable Property	10-17
10.9	Affiliated Persons	10-18
	10.9.1 Accrued Gains	10-18
	10.9.2 Accrued Losses	10-19
Chapter 11: Partnerships		
11.1	Introduction	11-2
11.2	Formation and Dissolution	11-3
	11.2.1 Transfer of Property to a Partnership	11-3
	11.2.1(a) General Rule	11-3
	11.2.1(b) Subsection 97(2) Tax-Free Contribution	11-3
	11.2.1(c) Contribution of Canadian Resource Property ..	11-5
	11.2.1(d) Contribution of Depreciable Property	11-5
	11.2.1(e) Cost of Boot and Partnership Interest	11-6
	11.2.1(f) Examples	11-7
	11.2.2 Transfer of Property from a Partnership to a Corporation	11-8
	11.2.3 Dissolution	11-8
	11.2.3(a) General	11-8
	11.2.3(b) Transfer to Another Canadian Partnership	11-11
	11.2.3(c) Transfer to a Sole Proprietorship	11-11
	11.2.3(d) Transfer of Undivided Interest	11-12
	11.2.3(e) Retiring Partner	11-16
11.3	Deduction of Expenses	11-17
11.4	Two-Tier Partnership	11-20
11.5	Adjusted Cost Base (“ACB”) Adjustments	11-21

Table of Contents

11.6	Sale of a Partnership Interest.....	11-22
	11.6.1 Sale by a Canadian Resident	11-22
	11.6.2 Sale by a Non-Resident	11-24
11.7	Allocation of Income or Loss	11-26
	11.7.1 Partner’s Share	11-26
	11.7.2 Restriction on Allocation.....	11-26
	11.7.3 “At-Risk” Rules	11-28
	11.7.3(a) Background	11-28
	11.7.3(b) Statutory Scheme.....	11-29
	11.7.4 Limited Recourse Rules.....	11-33
11.8	Tax Returns of Non-Resident Partners	11-35
	11.8.1 General.....	11-35
	11.8.2 Sale by Partnership.....	11-36
Chapter 12: Flow-Through Shares		
12.1	Introduction	12-3
12.2	Structure of Chapter.....	12-5
12.3	Statutory Framework	12-6
12.4	Type of Expenses.....	12-7
	12.4.1 Canadian Exploration Expense (“CEE”).....	12-7
	12.4.2 Flow-Through Mining Expenditure.....	12-11
	12.4.3 Canadian Exploration Expense (“CEE”) and Canadian Development Expense (“CDE”) — Development	12-12
	12.4.4 Overhead and Affiliate Costs — Canadian Exploration and Development Overhead Expense (“CEDOE”)	12-14
	12.4.5 Staking Claims	12-17
	12.4.6 Feasibility Studies.....	12-17
	12.4.7 Old and New Mine Sites.....	12-18
	12.4.8 Seismic	12-19
	12.4.9 Assistance.....	12-19
	12.4.10 Exclusion for Pre-Production Revenue.....	12-20.3
12.5	Type of Company.....	12-20.3
	12.5.1 Definition	12-20.3
	12.5.2 All or Substantially All.....	12-22
	12.5.3 Time for Qualifying	12-24
	12.5.4 Non-Resident Company	12-25
	12.5.5 Business Outside Canada	12-25
	12.5.6 Resource Properties Owned	12-25
	12.5.7 Time of Commencing Business	12-26
	12.5.8 Parent-Subsidiary Structure	12-26
12.6	Type of Share	12-28.2
	12.6.1 Definition	12-28.2
	12.6.2 Prescribed Share and Prescribed Rights	12-29

Table of Contents

	12.6.3 Agreement in Writing	12-37
	12.6.4 Warrant Structure.....	12-38
12.7	Type of Investor	12-40.1
	12.7.1 Person	12-40.1
	12.7.2 Non-Resident	12-40.1
	12.7.3 Partnership	12-41
	12.7.4 Agent	12-41
	12.7.5 Deceased Investor.....	12-42
12.8	Procedural Rules	12-42
	12.8.1 Selling Instrument.....	12-42
	12.8.2 Tax Shelter Registration	12-43
	12.8.3 Basic Renunciation	12-44
	12.8.4 One Year Look-Back.....	12-45
	12.8.5 Removal of Expense	12-49
	12.8.6 Partnership Procedure.....	12-49
	12.8.7 Failure to File	12-50
	12.8.8 Late Filing.....	12-50
	12.8.9 Excess Renunciation	12-51
	12.8.10 Penalties for Excess Renunciation.....	12-52
	12.8.11 Tiered Renunciation	12-52.1
	12.8.12 Prohibited Warehousing.....	12-52.1
	12.8.13 But-For Test.....	12-52.2
	12.8.14 Third Party Penalties	12-52.2
	12.8.15 Communication of Information	12-53
	12.8.16 Six Year Reassessment Period.....	12-53
	12.8.17 Partnership Filings.....	12-54
	12.8.18 T2 Income Tax Returns.....	12-54
	12.8.19 Notice of Objection and Appeal	12-54
	12.8.20 COVID-19 Relief: One-Year Extension.....	12-56
12.9	Tax Benefits to Investor.....	12-59
	12.9.1 Deemed Expense.....	12-59
	12.9.2 Generating a Loss.....	12-60
	12.9.3 Federal Investment Tax Credit (“ITC”)	12-60.1
	12.9.4 Provincial Flow-Through Share Tax Credits	12-60.7
	12.9.5 Form T1229	12-60.11
	12.9.6 Investor’s Adjusted Cost Base.....	12-60.11
	12.9.7 Paid-Up Capital (Inside Basis).....	12-62
	12.9.8 Alternative Minimum Tax	12-62
	12.9.9 Cumulative Net Investment Loss Account	12-62
	12.9.10 Allowable Business Investment Loss	12-63
	12.9.11 Stock Option Flow-Through Shares.....	12-63
	12.9.12 RRSP Contributions.....	12-64
	12.9.13 Partnership Issues	12-64

Table of Contents

12.10	Subsequent Transactions.....	12-66
	12.10.1 Share Sale.....	12-66
	12.10.2 Acquisition of Control.....	12-67
	12.10.3 Amalgamation	12-67
	12.10.4 Divisive Reorganizations.....	12-68
	12.10.5 Partnership Transactions	12-68
	12.10.6 Donation of Flow-Through Shares	12-70
Chapter 13: Provincial Income Taxes		
13.1	Introduction	13-1
13.2	History	13-1
13.3	British Columbia	13-6
13.4	Northwest Territories.....	13-10
13.5	Ontario.....	13-10
13.6	Saskatchewan	13-11
Chapter 14: Provincial Mining Taxes		
14.1	Introduction	14-2
14.2	Ontario Mining Tax	14-6
	14.2.1 Liability for Tax	14-6
	14.2.2 Tax Rate	14-7
	14.2.3 Exemption for New Mine and Mine Expansion	14-8
	14.2.4 Remote Mine Exemption	14-9
	14.2.5 Profit Calculation	14-10
	14.2.5(a) Inclusions	14-10
	14.2.5(b) Deductions	14-13
	14.2.5(c) Depreciation and Processing Allowance	14-14.1
	14.2.5(d) Remote Mine Profits	14-16
	14.2.5(e) Losses.....	14-17
	14.2.6 Payment	14-18
	14.2.7 Filing Requirements.....	14-18
	14.2.8 Assessment and Reassessment.....	14-19
	14.2.9 Penalties and Offences	14-19
	14.2.10 Collection and Enforcement.....	14-19
	14.2.11 Ontario Royalty and Diamonds.....	14-19
14.3	British Columbia Mineral Tax	14-20
	14.3.1 Tax Payable.....	14-21
	14.3.2 Credits Available	14-23
	14.3.3 Liability for Tax	14-25
	14.3.4 Calculation of Tax.....	14-26
	14.3.4(a) Cumulative Tax Credit Account	14-26
	14.3.4(b) Net Revenue.....	14-27
	14.3.4(c) Net Current Proceeds	14-36.2

Table of Contents

	14.3.4(d) Cumulative Expenditure Account (“CEA”).....	14-36.3
	14.3.5 Disposition of a Mine.....	14-36.3
	14.3.6 Filing Requirements.....	14-37
	14.3.7 Payment Requirements	14-38
	14.3.8 Books and Records.....	14-38
	14.3.9 Assessment and Reassessment.....	14-39
	14.3.10 Penalties and Offences	14-40
	14.3.11 Collection and Enforcement.....	14-40
14.4	Northwest Territories Royalty	14-41
	14.4.1 Liability for Tax	14-42
	14.4.2 Royalty Rates.....	14-42
	14.4.3 Value of Output	14-43
	14.4.4 Permitted Deductions	14-45
	14.4.5 Prohibited Deductions	14-48
	14.4.6 Payment of Royalties.....	14-49
	14.4.7 Filing Requirements.....	14-49
	14.4.8 Books and Records.....	14-50
	14.4.9 Appeals	14-51
14.5	Saskatchewan Potash Taxation	14-52
	14.5.1 Potash Mining.....	14-52
	14.5.2 Saskatchewan Potash Royalties.....	14-53
	14.5.3 Saskatchewan Potash Mining Tax.....	14-53
	14.5.4 Saskatchewan Capital Tax — The Resource Surcharge	14-54
 Chapter 15: Industrial Minerals		
15.1	Introduction	15-1
15.2	Exploration Costs.....	15-2
15.3	Development Costs.....	15-2
15.4	Property Costs.....	15-2
15.5	Plant and Equipment Costs	15-4
15.6	Tax Rate	15-6
15.7	Provincial Mining Tax	15-6
 Chapter 16: Foreign Exploration and Mining		
16.1	Introduction	16-2
16.2	Foreign Exploration and Development Expense (“FEDE”) and Foreign Resource Expense (“FRE”).....	16-3
	16.2.1 Foreign Exploration and Development Expense (“FEDE”)	16-4
	16.2.2 FRE Definition — Discussed.....	16-6
	16.2.2(a) Statutory Interpretation	16-6
	16.2.2(b) Selected Elements of FRE Definition.....	16-6

Table of Contents

	16.2.2(c) Exploration Expense	16-6.1
	16.2.2(d) Purpose Test in Paragraph (j): One of Three Qualifying Purposes	16-6.2
	16.2.2(e) Purpose Test in Paragraph (j): Need not be Principal Purpose.....	16-6.3
	16.2.2(f) Purpose Test in Paragraph (j): Evidence to Prove Purpose	16-6.3
	16.2.2(g) FRE Definition: Statutory Context and Purpose	16-6.5
	16.2.3 Mechanics	16-7
16.3	Foreign Tax Credit	16-8
	16.3.1 General.....	16-8
	16.3.2 Income or Profits Tax.....	16-9
	16.3.3 Business-Income Taxes	16-10.1
	16.3.4 Non-Business-Income Taxes	16-12
	16.3.5 Mechanics of Foreign Tax Credits	16-12
	16.3.6 Mechanics: Business-Income Tax	16-13
	16.3.7 Mechanics: Non-Business-Income Tax	16-15
	16.3.8 Provincial Foreign Tax Credits	16-17
	16.3.9 Excess Foreign Tax Credits.....	16-17
16.4	Foreign Affiliate System	16-19
16.5	Outbound Loans: Section 17.....	16-20
	16.5.1 Mechanics	16-20
	16.5.2 Exceptions	16-21
	16.5.3 Anti-Avoidance Rules: Indirect Funding.....	16-22
	16.5.4 Anti-Avoidance Rules: Partnerships and Trusts	16-24
	16.5.5 Anti-Avoidance Rules: Options.....	16-24
16.6	Transfer Pricing.....	16-24
	16.6.1 Arm's Length Transfer Price.....	16-24
	16.6.2 Penalties	16-25
	16.6.3 Contemporaneous Documentation	16-25
	16.6.4 Reporting	16-26
16.7	Royalty Rights Structure	16-26
16.8	Holding Company Structure	16-29
16.9	Financing Company Structure	16-31
 Chapter 17: General Anti-Avoidance Rule		
17.1	Introduction	17-1
17.2	Tax Benefit	17-2
17.3	Avoidance Transaction	17-3
17.4	Misuse or Abuse.....	17-2
17.5	Interest Deduction GAAR Cases	17-4
17.6	Surplus Stripping GAAR Cases	17-5

Table of Contents

17.7	International GAAR Cases.....	17-8
17.8	Capital Loss Cases.....	17-11
Chapter 18: Functional Currency		
18.1	Default Rules	18-1
18.2	Functional Currency Election: Eligibility	18-2
18.3	Functional Currency Election: General Rules.....	18-4
18.4	Functional Currency Election: Transition of Existing Tax Attributes	18-7
18.5	Functional Currency Election: Tax Payments & Refunds — Canadian Currency.....	18-11
18.6	Functional Currency Election: Partnerships	18-12
18.7	Functional Currency Election: Foreign Affiliates and FAPI.....	18-13
18.8	Functional Currency Election: Conversion of Amounts Carried Back	18-15
18.9	Functional Currency Election: Revocation of Functional Currency Election	18-16
18.10	Functional Currency Election: Liquidations and Amalgamations	18-17
18.11	Functional Currency Election: Anti-Avoidance Rules	18-21
Glossary		
1	Introduction	Glossary-1
2	Abbreviations	Glossary-1
3	Words and Phrases	Glossary-2
Appendix		
	<i>Income Tax Act</i> [relevant excerpts].....	ITA-1
	Income Tax Folios	
	S3-F8-C1 – Principal-business Corporations in the Resource Industries.....	F-1
	CRA Views [relevant items]	
	Memo 9705947 — Losses, meaning of “similar”, mining properties (Date: March 24, 1997; Reference: 111(5)).	CRA Views-1
	Ruling 2001-0081133 — Cumulative eligible expenditures (Date: 2001; Reference: 66.1(6))	CRA Views-4
	Tech Interp (internal) 2001-0071097 — Resource allowance — tailings (Date: April 17, 2001; Reference: 20(1)(v.1), 1204(1)(b)(iii)).....	CRA Views-10
	Interpretation — external 2005-0119731E5 — Paragraph (f) of Canadian exploration expense definition (Date: June 15, 2005; Reference: 66.1(6) “Canadian exploration expense”, 66(15), 66(12.6)).....	CRA Views-15

Table of Contents

<p>Interpretation — internal 2006-0172361I7 — Canadian resource property (Date: March 28, 2006: Reference: 66(15), 66.4(5), 66.2(5), 59(3.2)(c))</p> <p>2006-0212861R3 — Amendment to flow-through share agreement (Date: 2006: Reference: 66(15), 66(12.73), 66(12.66)).....</p> <p>Ruling 2008-0290331R3 — Underground exploration program — Canadian exploration expense (Date: 2009: Reference: 66.1(6)“Canadian exploration expense”(f)).....</p> <p>Ruling 2009-0336261R3 — Transferable warrants and flow-through shares (Date: 2009: Reference: 66(15), 66(12.6), 66(12.66))</p> <p>Ruling 2009-0350941R3 — Exploration / new mine Canadian exploration expense (Date: 2010: Reference: 66.1(6)“Canadian exploration expense”)... ..</p> <p>Interpretation — external 2009-0345121E5 — Surface lease bonus payments in oil and gas industry (Date: February 15, 2010: Reference: 66.1(6), 66.2(5), 14(5))</p> <p>Interpretation — external 2010-0357731E5 — Exploration expenses incurred by sole proprietor (Date: February 18, 2010: Reference: 66(5), 66.1)</p> <p>Ruling 2008-0293011R3 — Exploration program — Canadian exploration expenses (Date: 2011: Reference:66.1(6)“Canadian exploration expense”)</p> <p>2011-0408981R3 — Canadian exploration expenses</p> <p>2011-0422761R3 — Canadian exploration expenses</p> <p>2010-0362481R3 — New mine</p> <p>2012-0441771R3 — Canadian exploration expenses</p> <p>2012-0472311E5 — Flow-through shares.....</p> <p>2013-0512191E5 — Mining activities and SR&ED</p> <p>2012-0466731R3 — Donation of flow-through shares</p> <p>2012-0452841E5 — Sale of a mining claim.....</p> <p>2012-0462361I7 — Meaning of “prime metal stage or its equivalent”</p>	<p>CRA Views-19</p> <p>CRA Views-22</p> <p>CRA Views-22.8</p> <p>CRA Views-30</p> <p>CRA Views-38</p> <p>CRA Views-47</p> <p>CRA Views-50</p> <p>CRA Views-52</p> <p>CRA Views-59</p> <p>CRA Views-68</p> <p>CRA Views-76</p> <p>CRA Views-82</p> <p>CRA Views-89</p> <p>CRA Views-92</p> <p>CRA Views-94</p> <p>CRA Views-106</p> <p>CRA Views-109</p>
--	---

Table of Contents

2010-0362481R3 — New mine	CRA Views-111
2012-0463621R3 — Qualifying environmental trust—qualifying site.....	CRA Views-117
2012-0463471R3 — Single reclamation trust	CRA Views-122
2012-0480021I7 — Section 35—prospectors	CRA Views-128
2013-0497641E5 — Flow-through shares and stock options	CRA Views-131
2013-0506641E5 — CCA class(es) for mineral claims and mining leases.....	CRA Views-134
2014-0534941E5 — Flow-through share subsec. 66(15)....	CRA Views-136
2014-0559451E5 — Deduction pursuant to para. 20(1)(v).....	CRA Views-138
2014-0547911E5 — Flow-through share renunciations	CRA Views-141
2014-0534121R3 — Canadian exploration expenses—new mine.....	CRA Views-144
2014-0536661R3 — Disposition of property by a foreign partnership	CRA Views-152
2015-0594201E5 — Election under 159(6.1)	CRA Views-160
2015-0610601C6 — 2015 CTF Q.10 Thin cap—foreign currency debt	CRA Views-163
2016-0675902I7 — Canadian exploration expense	CRA Views-165
2016-0674541E5 — Mineral certification.....	CRA Views-170
Index	I-1