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Anne-Marie Beaudoin Corporate Secretary Autorite des marches financiers 800 Square Victoria, 22e etage CP 246, Tour de la Bourse Montreal, Quebec, H4Z 1G3

## Re: Proposed Amendments 41-101 Submission to jurisdiction provisions for QP's

Gentlemen:

Tiger International Resources is a junior company, listed on the TSX Venture Exchange, and active in the development of resource ventures in South East Asia and Australia. Presently the Company has an active advanced exploration project in the Republic of the Philippines.

We strongly object to the proposed registration requirements under proposed Amendments 41-101 General Prospectus Requirements and Companion Policy 41 101CP since they are simply impractical.

We observed that recent amendments to NI 43-101 resulted in many foreign geologists and mining engineers choosing to abandon Canadian client companies since they did not wish to be more legally exposed than previously, and because they have plenty of client companies from Australian and other regions and simply decided that they did not need the business from a Canadian client. Many of those experts are Australians who work under AusIMM regulations and JORC requirements, and have chosen to not compete with Canadian regulators who seem to wish to change the world by changing Canadian regulation, assuming that the world will change along with it.

The proposed NI 41-101 regulatory amendments isolate Canada from the rest of the world, and make it more difficult for a Canadian incorporated and listed company to function. To demand that an expert consultant modify his compliance standards to suit Canadian regulators is impractical and is unlikely to achieve a positive result.

After recent amendments to NI 43-101 we observed that experts who had served our company in prior times notified us that they considered the changes to be "jobs for the boys" (meaning that they supported Canadian experts to the detriment of experts from other regions) and that the experts chose to not respond. This resulted in our company having to scramble to find experts who could meet the new requirements of NI 43-101, and this has proven to be difficult. We know of not a single Canadian geologist who is independent, meets the experience requirements of the recent 43-101 amendments, and understands the unique laws of the Philippines. For example, in a property report we want to know that the property in question is capable of actually being placed in production, and Canadian geologists who are unfamiliar with local Philippine requirements simply cannot authoritatively respond to this requirement. Yet by modifying NI 43-101 the available pool of foreign experts who can write a truly expert report has dwindled. The proposed changes to NI 41-101 will shrink this pool further since foreign experts will largely choose to ignore the new requirements, meaning that our Canadian listed and incorporated company cannot use their services. Furthermore, while the Canadian Regulators may assume, perhaps naively, that they can impose stronger regulatory requirements on experts from foreign countries, the net result is to limit the availability of such experts, making operations of Canadian companies abroad yet more difficult.

It may be valuable for regulators to understand that your client Canadian companies function in a competitive environment. Good expert consultants that meet the independent test of 43-101 are in demand, and should these experts decide that they don't need the business of a Canadian company then the company is starved of expert help. The eventual choice of these Canadian companies is to seek domicile and jurisdiction of the more hospitable countries and to abandon Canada and its regulatory mechanism entirely. None of this is productive.

Please ask yourselves why any foreign expert should submit to a regulatory change that places a potential Sword of Damocles over his head? Why should he choose to register or appoint an Agent for Service when he is obviously placed to expense in doing so as well as exposing himself to obviously greater legal and risk liability? It doesn't take much thought to realize that he can be employed by an Australian, Chinese, European, or SE Asian company and not suffer this level of risk. Clearly, the exposure will limit the availability of the most skilled experts in regions in which our company functions.

Presently, the responsibility to evaluate experts that are capable of authoring property reports is primarily that of the Issuer (the Company), and that is where the responsibility should rest. The Company presently bears the burden of responsibility with the Canadian Regulator, and that is appropriate and correct, and it should continue without modification.

We propose that the proposed amendments to NI 41-101 be extinguished as being impractical, burdensome on Canadian client companies, and perhaps unenforceable.

Very Truly Yours, **Tiger International Resources Inc.** 

Patric Barry President