

AME MEMBERS SHARE OPPOSITION TO PROPOSED HERITAGE CONSERVATION ACT CHANGES

November 14, 2025

As an addendum to our letter sent to the Minister of Forests on [October 20, 2025](#), AME conducted town halls online and in person across the province in the communities of:

- Cranbrook: September 18 and November 4, 2025
- Kamloops: October 17, 2025
- Smithers: October 21, 2025
- Vancouver and online: October 30, 2025
- Nanaimo: November 12, 2025

Members shared feedback on many subjects, but the town halls were advertised and focused on informing members about the proposed changes to the Heritage Conservation Act (HCA). In many cases our members were unaware of the changes before our engagement, which emphasized the importance of the Ministry of Forests extending the consultation deadline to November from its original October 1 deadline. The additional time allowed us to meet with members after the summer field season to discuss the changes in-depth. While conversations were more detailed, we have provided the most pertinent and relevant points from our town hall discussions.

With that said, AME members find the changes unacceptable. This is a clear example of what our members generally mean when they talk about competitive and harmful policy changes in British Columbia. We found support for AME's request that the ministry pauses the process and engages in a meaningful way about how specifically to speed up the process rather than taking broad latitude to download responsibility to First Nations. Please consider our letter and this member engagement summary as clear opposition, with direct examples of the unintended consequences of the current policy direction.

ENGAGEMENT THEME RESPONSE

We chose to wait to answer your specific engagement themes until we could engage our members broadly. Based on these discussions, we have responded to your questions below.

- How does the policy direction support or impact your local government's/organization's/sector's/interests?
 - The changes will impact our members by increasing permitting timelines and creating further uncertainty for investment in our province.
- Are there possible unintended consequences of the proposals? How can these be addressed?
 - There are many unintended consequences from the broadening of scope, including slower permitting, investment uncertainty, and enforcement from non-provincial government organizations.
- What kinds of guidance, education, or outreach would be needed to support implementation?
 - A pause and real engagement with industries about what changes could be made to reduce red tape.

- Are there any alternatives we should consider to achieve these outcomes? Is there anyone else we should talk to?
 - Your ministry should bring together all affected stakeholders to engage on the specific interface of the HCA with their relevant permits and interfaces. In our case, AME would gladly facilitate a discussion with prospectors, explorers and junior mining companies who file Notice of Work (NoW) permits and often hire archaeologists.

SUMMARY OF CONCERNS

- Members do not feel properly engaged, or consulted
- Members feel the changes will not result in faster timelines
- Members feel that decisions and enforcement authority must rest with the province

AME MEMBER FEEDBACK

OVERALL

- “One of the things that I've noticed that I've heard from some prospectors is it's, it's a lot harder now to option their claims. Doesn't matter if they find anything, even if they find something, they're having a lot of trouble trying to option their claims.... and the constant changes are scaring a lot of investors away, because if you're going to invest your money, you want to return, and if you're uncertain, like, well, I don't know if I'm going to get a return in BC, or what that's going to look like, or if there's a chance we're gonna put the money in and then lose it, I'm gonna invest my money somewhere else.” Kamloops
- “I think, but I would be afraid, as an economist, that the changes that they're anticipating will actually slow permitting, and I'm worried that it may remove certain areas or land permanently from mineral exploration and development.” Vancouver
- “I think the Heritage Conservation Act [changes] is just another nail in the coffin... We don't need another stick in the mud for permitting. As many already talked about it, our permitting delays are already way too long. [The HCA will] definitely be adding to delays. So you know, if I had a vote on it, we just throw the whole thing out.” Vancouver
- “My impression from the conversation here is that government is introducing more regulation, rather than less, for the sake of the regulation, not for the sake of doing anything with it, but just for the sake of having more regulation by a specific group of people, and that in today's economic environment, is not helpful, believe me, that is not helpful.” Vancouver
- “We just went through getting a Heritage Conservation Act permit. The company I'm working for takes an average now about a year and a half to two years to get one. I had to keep trying to get all the information from government, and to try to push it forward. If we hadn't done this, going out to the First Nations and pushing it and bringing the government around the table it probably would have taken much longer to get.” Nanaimo
- “The more red tape, the less employment there is. And I've been on enough jobs where they've been waiting, waiting, and waiting for permits, and then these companies are already going bankrupt before they even have a chance to get going. And it's disheartening, because we'll bid on a job. And then, oh, now we wait for permits.” Nanaimo

CONSULTATION

- “Consultation feels like a waste of energy.” Cranbrook
- “Nothing has indicated that [government] are open to hearing what industry is actually trying to say.” Cranbrook

FASTER TIMELINES

- “While the BC Government’s objective of making permitting faster and easier with increased participation from First Nations is laudable, the proposed changes to the Heritage Conservation Act risk doing the opposite by adding time, uncertainty, and a more complex decision-making process.” Letter from AME Member
- “In terms of timelines. My question is, who's driving the objectives First Nations, or if there's a conflict? Who's in charge? Does the ministry get to say, you guys have 30 days maximum to figure it out. We know from other processes, they get 30 days, 60 days, whatever it's a comment, whenever they feel. And then after that extension they can get another extension if they ask for it and so on.” Cranbrook

GOVERNMENT AS THE FINAL DECISION MAKER

- “It should be clear that the province remains the final decision-maker and enforcement body, with appropriate consultation, and that the decision process is clear, transparent and based on scientific and factual information that can be verified.” Cranbrook
- “I think the other thing is these agreements that the province is structuring with First Nations around joint decision making, not only just joint land use planning, but joint decision making, so it falls into it falls into every permit that's out there, so you do not have government acting as the final decision maker. Actually, government is abdicating its role and handing off and saying, if you get consent, we'll give you a permit. And that is not very nice.” Smithers

RESTRICTING ACCESS TO LAND

- “The updated HCA process should not become an avenue to remove or limit yet more Crown land from access by the natural resource sector, except in clearly defined and limited situations, and should be restricted to specific sites and not broad regions.” Cranbrook

WHO DOES THE ARCHEOLOGY AND WHAT'S THE COST

- “The last archeology survey we did, the First Nation sent a young lady who was not qualified. She wasn't an archeologist, but she was their representative, and she was on five drill sites. She said three of them were not suitable. They were high mineral potential. Our archeologist, who's had a lifetime of doing archeology, said he disagreed, but she carried the day. So, we couldn't drill on those three and they wanted an Archaeological Impact Assessment (AIA) to see if we could drill on those three sites at a cost of \$60,000 dollars.” Cranbrook
- “Some of the conversations I've had with the First Nations are basically, yeah, you're going to need an archaeological permit. But you have to be one of these five archeology firms call those off waitlisted for over a year.” Nanaimo

- “[An archeology permit cost us] probably about quarter million dollars. The all in costs are because of the consulting company that we're using... and then the land guardians from the Nation.” Nanaimo

ON TRANSPARENCY

- “So just one thing on accessing historical data, it seems [nations] want to be protective of any previous archeological reports, whether or field assessments or overviews.” Cranbrook

POSITIVE FEEDBACK ABOUT THE CHANGES

- “I do like the idea that you have one permitting process, because right now they have an overview permit that expires in a year, and you have to go apply for it again. And it can get you three months. It can take you three months to get it, and then you go for your actual fines. If you actually find anything, you have to get a permit for those, and you have to have a permit to excavate. And all of these things take about a year each. So that's, you know, that's really difficult. They should be able to streamline that to make it so you can get one permit that carries through.” Smithers

CAPACITY

- “And then also on the capacity issues, you know, I think we discussed earlier, but the lack of capacity in many of the First Nations to try and address these additional responsibilities that are potentially going to be put on them, from an explorer's perspective, there's also capacity issues with the smaller companies and individual prospectors to try and meet these requirements that are being imposed. You know, we need to try and be as efficient as possible on both sides of the equation, such the junior explorers, the individual prospectors, are able to actually, in a meaningful way, provide the information that's needed to make those decisions, but not make it so onerous that it's impossible to do so on a limited budget, and also to simplify things for the First Nations to provide meaningful input.” Kamloops

DATA AND INFORMATION SOLUTIONS

- “[If] LIDAR data, can, be made more public, usually for the Ministry of Forests, that'll help any desktop studies or archeological overview assessments limit that size of those high potential polygons. Without that data, the archeologists are forced to just draw big buffer zones on any water feature, because it could have been, but if they have the LIDAR data to go and review landforms, it helps them tighten up those polygons a lot more to before they must go to the field, say.” Cranbrook
- “Share high potential sites early on, so we can avoid staking, or applying for work on those areas.” Cranbrook
- “Can government and nations just work to build a unified database of all the archeology sites and work that's been done so we know where we can work.” Cranbrook