

March 27, 2025

Hon. David Eby
Premier
Government of British Columbia
Victoria, British Columbia V8W 9E1

Sent via email: premier@gov.bc.ca

Dear Premier,

Open Letter Re: Urgent Follow-Up Regarding Mineral Claims Consultation Framework

AME would like to thank you for meeting the March 26, 2025, deadline required by the *Gitxaala vs. British Columbia* decision. While it took most of the 18 months, the Ministry of Mining and Critical Minerals (MCM) eventually put forward a plan to consult and accommodate First Nations for the impacts of mineral claims on their rights. This was a substantial effort, and we thank you for listening to some of our key concerns.

We would like to take the opportunity to provide feedback on the, at times, confusing and opaque process to develop the Mineral Claims Consultation Framework (MCCF). The Ministry has not been transparent with industry, or open to making key changes until the eleventh hour. Throughout the process, the Ministry's efforts varied from attempting to build a consent standard; to closing off large portions of land by issuing orders under the Environment and Land Use Act (ELUA). In our view, this has caused a cooling effect from peak exploration expenditure of \$740M in 2022 to \$552M in 2024 representing a 25 per cent loss of investment during a time of high commodity prices.

While we were able to collectively resolve some of the glaring issues with the MCCF, the process still discloses applicant's names during the consultation on the claim application process. This does not protect intellectual property that may have been developed by the applicant and may also introduce subjectivity into the consultation and decision-making process. We continue to urge you to change this.

Timelines also remain a concern. As you have rightly pointed out in calling for guaranteed timelines, delivering decisions on mineral claim applications on time is core to providing investors with certainty. We continue to urge you to monitor the MCCF's implementation and look forward to reviewing the progress after six months.

In February, AME conducted seven town halls with members across the province from Cranbrook to Nanaimo. We also participated in the Prospectors & Developers Association of Canada (PDAC) conference in Toronto. Through these conversations it is clear from our members and investors that BC is sending the wrong message.

We urge you to act now to support BC mineral exploration by:

- **Mineral Tenure Act (MTA) Modernization** – Letting the MCCF have a chance to become operational and work out the issues that will inevitably arise during implementation before overhauling the MTA by your stated target of 2026. A rushed MTA modernization would cast a further shadow on mineral exploration investment in BC. If not, government must provide industry and First Nations with seats at a shared table in its development immediately. Government must also release a clear, detailed roadmap early in the MTA modernization process with specific timelines and measurable milestones.

- **Notice of Work (NoW) Permits** - Reducing timelines for NoW permitting decisions immediately will unlock early-stage mineral exploration, put people to work and attract investment right away. The average cost of an exploration project is \$1.95M with more than 90 per cent of the spend staying in our province. Approving the 147 NoW permits currently in the system could add \$287M of mineral exploration spending in the province. Making a goal of having 400 active exploration projects would mean \$780M. Now is the right time to be ambitious.
- **Resourcing** - Budget 2025 contained no additional growth in the MCM budget and no allocation of staff for the MCCF or NoW permits. You must properly resource the ministry to take on these issues.

We share your ambition to develop to attract more investment and opportunities from mineral exploration to advance British Columbia's critical minerals sector. However, your government has been sending the wrong message. AME remains focused on solutions and will continue to share the voices of our members.

Sincerely,



Trish Jacques
Chair
Board of Directors
Association for Mineral Exploration

cc: Hon. Jagrup Brar, Minister of Mining and Critical Minerals
Board of Directors, AME
AME members by email, website and social media