

November 13, 2025

Ministry of Energy and Climate Solutions
PO Box 9060 Stn Prov Govt
Victoria BC
V8W 9E2, CANADA

Sent via email: ECS.Minister@gov.bc.ca, info@rep-spa.ca

Dear Minister Adrian Dix,

Re: Proposed Regulatory Policies for Renewable Energy Projects

I am writing on behalf of the Association from Mineral Exploration and our over 6000 members who are engaged in early to late-stage exploration and development around the province and the world. While our members are generally supportive of access to clean and affordable energy, we have concerns that changes to the currently proposed regulations don't currently include explorers and mineral tenure holders in a direct way. Copper, gold, and silver are critical deposits that strengthens Canada's resource economy. Without mineral exploration, renewable energy projects containing the critical deposits would not be possible.

AME opposes any options that create the large-scale alienation of land, such as Environmental Land Use Act (ELUA) orders and No Registration Reserves (NRR). We feel that any removal of our members' interest in the land must include compensation. We advocate for practical solutions that enable both renewable projects and exploration to continue in our province.

Our concerns are around section 1.4 (Decommissioning and Restoration) & 3.4 (Crown Land Access) which talks about restricting access to crown lands. We are pleased to see the use of language that seeks to manage access in the public interest by considering and balancing interests of various parties. However, because the document and this section don't contemplate overlapping mineral tenures directly, we suggest working with the Ministry of Mining and Critical Minerals and our organization to ensure mineral tenure holders are informed and fairly treated as part of this process. We suggest early engagement from renewable developers that focuses on working together on the project development areas to site infrastructure away from drill targets and prospective work.

On December 9, 2024, the government released news regarding BC Hydro's selected nine energy projects declaring exemption to wind projects and all wind projects in BC from environmental assessment. Appendix A highlights the 10 Energy Projects: nine wind projects and one solar project and shows that the proposed projects overlap 259 existing mineral tenures and represent a risk for conflict with tenure holders if not properly addressed.

CONSIDERATIONS

- **Road Access and Infrastructure** - The potential impact on existing access routes, including Highway 97 and associated forest road access, must carefully be assessed for safety and accessibility for continued work our BC's stakeholders.
- **Mineral Claims** – Mineral claims are the foundational unit for mineral exploration. We hope to see no restriction on existing mineral tenures, or removals of claims.
- **Mineral Tenure Holders** - The BCER and other stakeholders must consult and collaborate with tenure holders with potential to work together obtaining raw materials from mining companies and obtaining electricity from the renewable projects.
- **Mineral Tenure Online** – Mineral explorers use the Mineral Tenure Online (MTO) to stake claims and it would be helpful to ensure that any wind projects are denoted on MTO in a way that does not restrict access.

QUESTIONS TO CONSIDER

- How will mineral tenures be affected?
- What types of land-based restrictions are being contemplated?
- What potential impacts on access, infrastructure, and road use within and around existing tenures are being considered?
- Is it possible to avoid broadly based land restrictions through the Notice of Work permitting process?
- Will restrictions be lifted upon decommissioning?
- How will information about projects and mapping shared to allow mineral explorers to understand if they're impacted?

FEEDBACK TABLES

As part of the engagement a series of feedback tables were provided. As most of these aren't relevant to mineral exploration, we have instead pulled out section 1.4 and 3.4 for specific comments.

1.4 DECOMMISSIONING AND RESTORATION

Pre-Application & Application Requirements – Decommissioning and Restoration		
Proposed Regulatory Policy	Rationale	Comments
Applicant must ensure a qualified professional prepares a decommissioning and restoration plan consistent with parameters established by the BCER and submits this plan to the BCER with their application for approval.	To receive a permit, applicants must demonstrate their acceptance of this responsibility for the decommissioning and restoration of project sites, their awareness of the practical and financial requirements of decommissioning and restoration, and their ability to complete decommissioning activities within an appropriate timescale.	Decommissioning plans should include an explanation of how the land can be used by overlapping interest holders such as mineral tenure holders once the project has concluded.

3.4 CROWN LAND ACCESS

Pre-Application & Application Requirements – Crown Land Access		
Proposed Regulatory Policy	Rationale	Comments
Applicants must prepare and submit an access management plan summarizing access restrictions consistent with parameters established by the BCER. The management plan must outline agreements or expectations for shared/overlapping use and how this use will be managed within the context of public safety, government objectives and First Nations interests. The access management plan must prioritize the physical security of the facility during construction and operation.	This plan should be informed by pre-engagement with impacted First Nations and community engagement with overlapping tenure holders and local authorities. This requirement ensures applicants are working collaboratively with impacted persons to develop access management policies and procedures that uphold public safety, while minimizing negative impacts to other users/rights holders on the land base. The BCER will implement binding permit conditions to supplement the access management plan as deemed necessary.	We support the inclusion of overlapping tenure holders to pre-engagement, but would suggest that the word “should,” needs to be changed to “must.” We suggest that a list of active mineral tenure holders be provided at the beginning of the process and that engagement must be a requirement. We also suggest that No Registration Reserves are not used, or are limited to small areas with a specific buffer zone to allow explorers to continue to work on their tenure.

Construction, Operations & Decommissioning Requirements – Crown Land Access		
Proposed Regulatory Policy	Rationale	Comments
Applicants must operate the facility in accordance with the access management plan and relevant permit conditions.	The BCER will conduct compliance and enforcement efforts based on the content of the access management plan and in response to complaints. If necessary, the BCER will enforce binding permit conditions regarding access-related issues.	Access to mineral tenures must be maintained.

Thank you for considering these points as we work together to advance mineral exploration and clean energy development in our province. You can reach me at tstone@amebc.ca for a discussion on this, or other matters related to mineral exploration.

Sincerely,



Todd Stone
President & CEO
Association for Mineral Exploration

CC: Honourable Jagrup Brar, Minister of Mining and Critical Minerals
Peter Pokorny, Deputy Minister Energy and Climate Solutions
Michelle Carr, Commissioner, Chief Executive Officer, BC Energy Regulator
Nathaniel Amann-Blake, Deputy Minister of Mining and Critical Minerals
Tania Demchuck, Assistant Deputy Minister of Mining and Critical Minerals
Scott Harris, Chief of Staff, Ministry of Energy and Climate Solutions
Patrick Meehan, Chief of Staff Ministry of Mining and Critical Minerals

APPENDIX A: RENEWABLES ENERGY PROJECTS

The available information is insufficient to determine the precise locations and total land area encompassed by the renewable energy projects. Of the nine proposed wind projects, only five include preliminary mapping data, which remain subject to change as projects develop.

For documentation and assessment purposes, AME's research overlaid map layers that **identified key project features, including preliminary substation locations and BC Hydro transmission lines**. Although, numerous mineral claims are present in proximity to these features, only those directly intersecting the key features are calculated for the purpose of data analysis.

Spatial data were developed through creation of shapefiles to support this analysis. No original shapefiles were provided to AME for direct verification or assessment.

HIGHLAND VALLEY WIND PROJECT

The Highland Valley Wind Project is in the South Interior West region, located north of Merritt and southwest of Kamloops. The region is abundant in copper and molybdenum – essential critical minerals for manufacturing wind turbines and power cables. However, the proposed wind project overlaps with **159 existing mineral claims, 12 Leases, and 1 application** that produces the same critical minerals vital for developing wind resources. Moreover, indetermined time of restricted access on roads such as Highway 97 would pose a significant concern for mineral exploration development.

NILHTS'L ECOENER WIND PROJECT

Similar to the Highland Valley wind project, continued and unrestricted access along Highway 97 is essential to support mineral exploration and infrastructure development. This will ensure that both industries can operate concurrently without interference. Within the preliminary layout of the Nilhts'l Ecoener wind project, there is an overlap with **22 existing mineral claims**.

MOUNT MABEL WIND PROJECT

The Mount Mabel Wind Project area overlaps with **71 existing mineral claims**. Due to its location, its prime location is optimal for workers that reside near Merritt and Logan Lake. Copper and gold porphyry targets are found in this location. Depending on mineral tenure holders, the preliminary project substation location is suggested to work around the mineral claims or consult with mineral tenure holders of conditions or collaborations. Ensure that the Highway 97 remains accessible for all mineral exploration work, infrastructure, and access.

BREWSTER WIND PROJECT

Located in Vancouver Island, the Brewster wind project **overlaps 7 existing claims and 4 applications**. Mineral exploration is a way to discover natural resources renewable energy projects need. Therefore, there should be no policy that hinder mineral exploration work or restrict access to Highways 28 and 19. Alternatively, propose a system that would both benefit the mineral exploration industry and renewable energy industries.

STEWART CREEK WIND PROJECT

The Stewart Creek wind project is in the Peace Regional System. This map lacks essential information including identified key project features such as turbine and substation locations to determine total impact in the area. Nonetheless, it is advised to consider surrounding mineral potential and potential restrictions of roads, airstrips, and access.