

November 18, 2025

Ministry of Water, Land and Resource Stewardship
PO Box 9484, STN PROV GOVT
Victoria BC, V8W 9W6

Sent via email: landuseplanning@gov.bc.ca

Dear Minister Neill,

Re: Feedback Response on the Gwa'ni Land Use Planning Process

AME is writing in response to the Gwa'ni Land Use Planning Project comment period. We are concerned that the current efforts will limit the economic activity of mineral explorers and that more effort should be put into working with these companies to facilitate exploration. There are currently 67 mineral claims and one application in the planning area. We have engaged several of these members over the past months and they are concerned about what restrictions could mean for the work and effort they have put into their projects and relationships with the 'Namgis First Nation.

The "Gwa'ni Project - Plan Summary" currently recommends a No-Registration Reserve applied to the plan area and the creation of frameworks are in place to ensure all mineral exploration within 'Namgis Territory is aligned with DRIPA and acquires 'Namgis consent, the Gwa'ni Project.

Since those recommendations, the Mineral Claims Consultation Framework has gone into effect on March 25, 2025. This consultation framework for staking mineral claims is compliant with the law and was the result of the Gitxaala v. British Columbia case. As such, the current staking system is compliant with the law and should be allowed to continue.

AME is also opposed to any efforts that would further alienate land, or put a moratorium on mineral exploration, especially in cases where members hold mineral tenure such as this. Any effort to remove this tenure from hard-working, rule following explorers, would be unacceptable.

RECOMMENDATIONS

We recommend that further work on the Gwa'ni Project:

- Does not create an NRR, moratorium, or limitations on mineral exploration.
- Takes mineral potential into consideration using updated maps.
- Not begin land use planning until the conclusion of the Northwest Land Use Plans as promised by the Ministry of WLR in May 2025.

PROPOSED MINERAL EXPLORATION VALUES

Enabling mineral exploration must be treated as a core value and conservation efforts must not restrict mineral tenure, mineral potential, or infrastructure access. To find and develop critical minerals and resources that BC needs, exploration must be treated with the highest importance. To do this we suggest three specific values be included in the process:

1. **Mineral Claims** – The government should not determine the economic viability of any project. While a helpful indicator of how much work has been done on a claim, the spend associated with exploration should not be used to determine the economic viability of a site. This is the sole

work and responsibility of explorers and therefore, any mineral claim the holder wishes to explore should be carved out of protection measures.

2. **Mineral Potential** – The BC Geological survey has done significant mineral potential modelling based off historic research. However, mineral potential mapping comes with limitations and cannot be applied as a treasure map, meaning that leniency should be given in areas that don't show a high modeled mineral potential. Simply, areas with mineral potential above the 40th percentile – or a D Mineral potential ranking class – should remain open to staking and exploration.
3. **Roads and Infrastructure** – Access to mineral exploration sites, by road, airstrip, electrical transmission, or other measure are vital to exploration and development and must not be impeded by conservation measures.

AME PRINCIPLES

AME is bringing forward several key principles in hopes that government will take seriously the concerns of industry in the land use process. These principles are foundational to a successful outcome and if ignored, risk harming the reputation of British Columbia. Principles were gathered and tested through a series of member engagements including four town halls. These principles are:

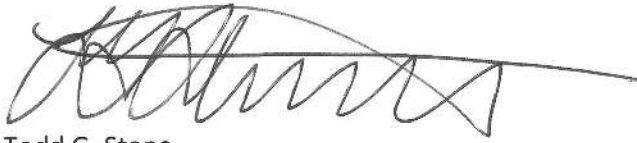
1. **AME Represents an Industry Interest** – AME will not speak for individual projects, or interests and members/claimholders should represent only their own projects.
2. **Defend the tenure, not the tenure holder** – AME will work to protect mineral tenure regardless of membership with the understanding that members may option, or purchase future claims.
3. **Fair compensation** – Avoid expropriation, but where required, ensure fair market compensation for expropriated tenure either voluntary, or involuntary.
4. **Maintain access and infrastructure** – Ensure that protections do not encroach on company's ability to access their land, through air strips, roads, powerlines, etc.
5. **Fairness** – Ensure that areas that are conserved are permanent and cannot be gamed (passed to another entity later).
6. **Seasonality** – Ensure that any proposed conservation measures do not restrict peak exploration seasons of spring to fall.
7. **Government must remain the final decision maker** – Government must retain the ability to make decisions on crown lands. This process cannot cede decision making power to another entity.
8. **Durability** – The final result of the Land Use Plan must hold up in the long-term. Global investment requires certainty and not a plan that will be renegotiated years later, because the decisions were not forward looking, or appropriate stakeholders, or overlapping First Nations were not appropriately consulted.
9. **Create a regional permitting advantage** – Ensure that non-protected areas are given expedited permitting and certainty for later stage development. Allowing for "conditional approval" in areas already known to be existing "go zones."

FURTHER LAND USE PLANNING

In May, ministry staff indicated to our board that the lack of resources required to focus on Land Use Planning anywhere else in the province during a discussion about the Northwest Land Use Planning Process. We urge you and your government to focus on getting the Northwest land use plan right before commencing other land use plans and work related to IPCAs in our province.

I look forward to the opportunity to work with you to ensure the mineral exploration sector continues to thrive. I can be reached at tstone@amebc.ca.

Sincerely,



Todd G. Stone
President & CEO
Association for Mineral Exploration

Cc: Randene Neill, Minister of Water, Land, and Resource Stewardship
Jagrup Brar, Minister of Mining and Critical Minerals
Lori Halls, Deputy Minister of Water, Land and Resource Stewardship
Nathaniel Amann Blake, Deputy Minister of Mining and Critical Minerals
David Muter, Assistant Deputy Minister, Water, Land, and Resource Stewardship
Tania Demchuk, Assistant Deputy Minister of Mining and Critical Minerals