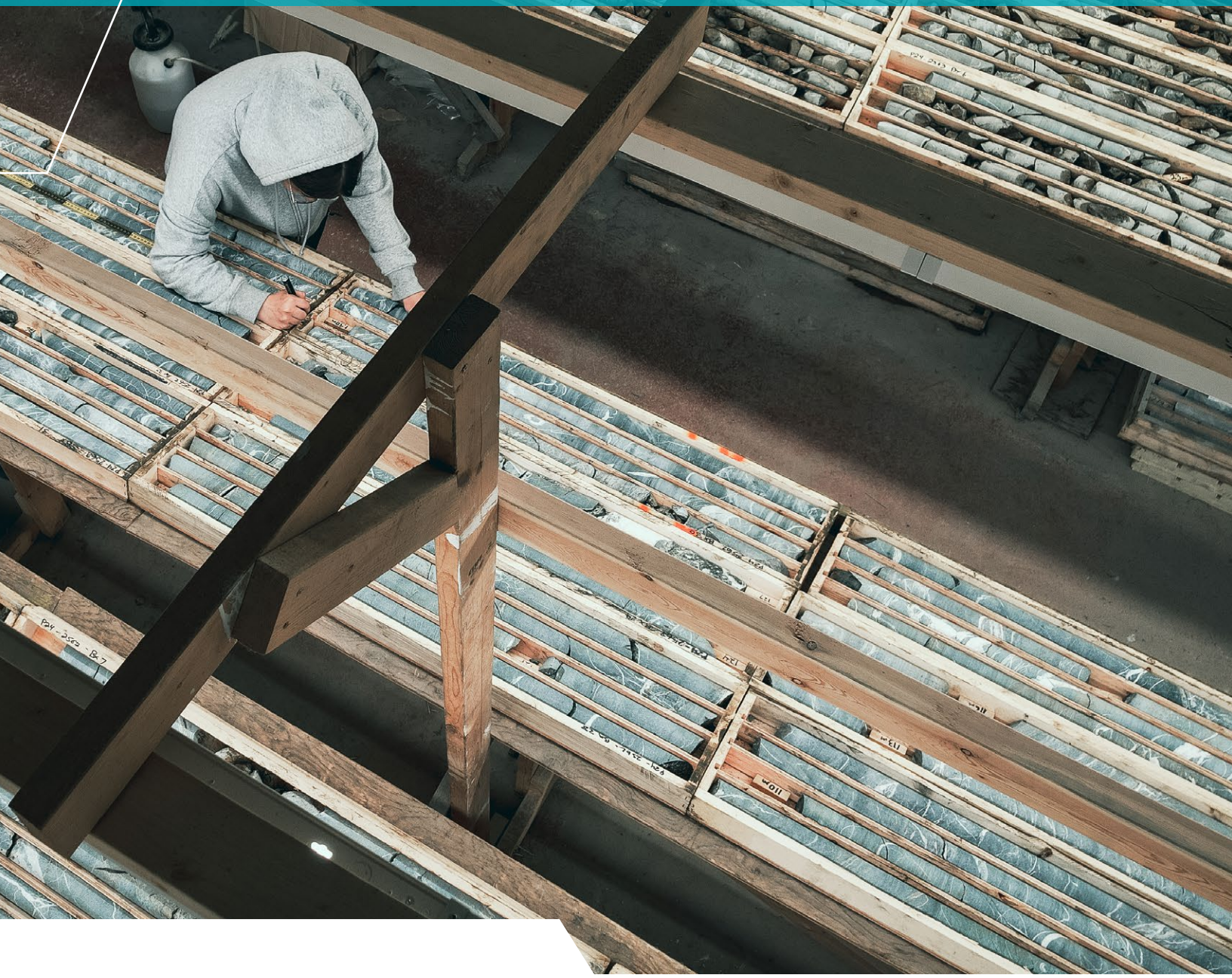
Town Hall Report

February 2025



Association for Mineral Exploration

Executive Summary

The Association for Mineral Exploration (AME) undertook a series of seven facilitated member engagement sessions across British Columbia in February 2025 with 117 members in attendance (see Appendix A). Held under the Chatham House Rule and structured as open town halls, these sessions offered an unfiltered view into the concerns of B.C.'s mineral exploration community at a time of significant regulatory transformation. An online survey was completed by 26 members (see Appendix B). The findings are clear: member frustration has reached a tipping point with the threat of members leaving the province and the industry altogether as a significant risk.

Mineral explorers across the province are facing unprecedented uncertainty. Between the rapid implementation of the Mineral Claims Consultation Framework (MCCF), the unclear path forward on Mineral Tenure Act (MTA) reform, and the implementation of the Declaration on the Rights of Indigenous Peoples Act (DRIPA), many AME members feel sidelined and are looking to do their work in other countries. Without urgent changes to ensure transparency, accountability, and timely decision-making, B.C. risks undermining the very foundation of its mineral exploration sector.

While AME continues to support reconciliation with Indigenous people and the principles of UNDRIP, members raised deep concerns that current policy shifts are evolving beyond consultation with Indigenous Nations into de facto consent regimes—without sufficient clarity or process safeguards. Free miners and small exploration companies feel that the system is becoming inaccessible, overly bureaucratic, and tilted in favour of large, well-capitalized firms.

This report captures the ten most pressing issues facing the sector, reflecting the feedback received at the February sessions, and providing a suite of recommendations to government aimed at restoring investor confidence, protecting B.C.'s globally competitive exploration sector, and ensuring a balanced, effective implementation of MTA reform and DRIPA.

Top 10 Themes Identified by AME Members

The following ten themes capture the most pressing concerns raised by AME members across all regions. Together, they paint a clear picture of the sector's top priorities and the urgent need for action.

1 Uncertainty Around MCCF and MTA Reform:

Members reported confusion over MCCF processes, concern with how overlapping claims would be managed, and fear of losing investment due to lack of legal clarity. Examples included concerns about "who clicks fastest" on MTO systems and worries that intellectual property will be exposed prematurely. Members expressed alarm at rushed timelines and unclear implementation details for both the MCCF and MTA reform, warning that these changes could destabilize the sector. This information was vital in our engagements with government in pushing for key changes to the MCCF.

2 Fears of a Shift from Consultation to Consent:

Members strongly emphasized that government must follow the law and maintain a consultation-based approach as per the Gitxaala decision and all future systems. Any drift toward requiring consent for claim staking is seen as damaging to explorers' ability to work.

3 Barriers to Accessing Crown Land:

Members described the removal of culverts, deactivated forest roads, and expanded no-staking reserves as practical barriers that effectively shut down opportunity to explore and develop, sometimes undermining past investments. There was also concern about land use planning, including government's 30x30 plan to protect 30 per cent of land by 2030 that would further remove access to land for exploration purposes.

4 Regulatory Delays and Permitting Inefficiencies:

Long Notice of Work (NoW) delays, inconsistent permitting timelines, and poor communication from government agencies are actively undermining exploration efforts and leading to missed mineral exploration seasons, lost contracts, and stranded capital. Worst of all, delays lead to an inability to raise capital which is required to hold mineral tenures, creating a death spiral for small businesses. Permitting delays were reported lasting up to two years, with small operators unable to sustain costs of holding mineral tenures.

5 Impact on Investment and Global Competitiveness:

International investors are increasingly hesitant to fund exploration in B.C. due to opaque regulatory processes and unclear tenure security. Members warned that capital is migrating to more predictable jurisdictions[1].

[1] https://mmsd.nrcan-rncan.gc.ca/expl-expl/ExploTable-eng.aspx?FileT=b&Year=2024&Cycle=P

6 Erosion of Free Mining:

Members warned that the junior sector is being “held hostage” by a system that demands ongoing investment despite long waits for approvals. Smaller operators and prospectors—the backbone of early-stage discovery—are being disproportionately affected by rising costs, administrative burdens, and a consultation framework ill-suited to their scale. This threatens the upstream supply of discoveries needed to develop future mines.

7 Lack of Indigenous Consultation Capacity:

Members acknowledged that delays are often caused by under-resourced Indigenous land offices, and called for targeted government investment to support timely, meaningful consultation without overburdening communities.

8 Opaque Government Communication and Decision-Making:

Members reported feeling excluded from key policy processes, noting that decision-makers often fail to engage with stakeholders in a timely, informed manner. They described dealing with multiples government advisors, inconsistent guidance, and lack of practical understanding within ministries about the exploration process.

9 Call for Transparent Metrics and Public Accountability:

Members want government to publish clear performance metrics (e.g., permit processing times, consultation timelines) to allow industry and the public to track accountability and system health.

10 Desire for Joint Dialogue and Grassroots Collaboration:

Members proposed more collaborative models between industry, Indigenous Nations, and government, and advocated for grassroots data collection to build an evidence-based case for reform.

VRO-1
VRO-2
VRO-3
VRO-1-B
VRO-2-B
VRO-2-Bx
VRO-4
VRO-4-B
VRO-4-Bx
VRO-3-Bx
VRO-5

Key Suggestions

In addition to identifying challenges, members offered practical solutions aimed at restoring confidence and improving the regulatory and policy environment in B.C. The following member-driven suggestions point to an actionable path forward for government and stakeholders.

- **Suspend Payment for Mineral Tenure During Delays:** Members stressed the need for mechanisms that pause payments during prolonged permitting or consultation periods, preventing applicants from losing claims due to bureaucratic delay.

- **Publish Performance Metrics:** A recurring request was for the government to regularly publish key metrics such as consultation turnaround times, permit processing durations, and response rates from Indigenous land offices.

- **Fund Indigenous Consultation Capacity:** Members supported increasing funding for Indigenous land offices to enable more timely and effective consultation, ensuring the system does not bottleneck at the community level.

- **Avoid Pay-to-Play Systems:** Members called for equitable frameworks that don't disadvantage small operators. Consultation obligations must be scaled to activity and requirements must allow explorers to be fiscally competitive.

- **Develop Conflict Resolution Mechanisms:** Clear, accessible channels to resolve disputes—especially around overlapping land claims or denied permits—were identified as essential to maintaining fairness and legal certainty.

- **Protect Intellectual Property in Early-Stage Exploration:** Concerns about disclosing claimant identities and locations before tenure is secured were widespread. Members proposed third-party mechanisms to preserve confidentiality while allowing meaningful notification.

- **Benchmark Against Leading Jurisdictions:** Members pointed to more efficient processes in places like Yukon and Western Australia and recommended borrowing elements of those systems to improve B.C.'s competitiveness.

- **Reinforce the Distinction Between Exploration and Mining:** Many stressed that mineral exploration is a low-impact activity and should not be regulated with the same intensity as mine development. Education campaigns and policy language must reflect this difference.

- **Reduce and set firm permitting timelines** by finding efficiencies and empowering statutory decision makers (SDMs) to make timely decisions even when challenging. Ensure that SDMs have relevant industry experience when being hired.

Survey Data

To complement the qualitative feedback gathered through the town hall sessions, AME also collected project-specific data through a structured survey. The survey focused on gathering insights into project delays, permitting timelines, consultation practices, economic impact, and barriers to land access.

Topics included:

- Project location and mineral type
- Project stage and Notice of Work (NOW) status
- Reasons for project delays
- Current and projected employment
- Estimated field season investment
- First Nations consultation timelines and challenges

Respondents were also asked to identify their top three concerns regarding the proposed MCCF. Full anonymous comments from surveyed AME members are provided in **Appendix B: Member Survey Comments**.

Conclusion

The mineral exploration sector in British Columbia is facing a moment of uncertainty. Through AME's February 2025 member engagement sessions, a consistent message has emerged: the current trajectory of regulatory reform, without meaningful industry consultation, is deeply concerning. Members warn it is eroding investor confidence, jeopardizing future discoveries, and threatening the foundational role of grassroots prospectors and small operators in B.C.'s mining ecosystem.

This report outlines members' pressing concerns and amplifies their calls for transparency, fairness, and accountability in government decision-making. It also offers a set of pragmatic, well-informed policy recommendations that, if implemented, could restore trust and balance in the system.

The path forward must be collaborative. AME remains committed to working alongside government, Indigenous Nations, and our members to shape a mineral tenure and permitting regime that is both responsive to reconciliation and resilient in the face of global competition. The stakes are high—but with deliberate, inclusive action, B.C. can lead the world in responsible, forward-thinking mineral exploration.

Appendix A: Methodology

AME hosted a series of seven facilitated member engagement sessions across British Columbia between February 11 and February 27, 2025. Discussions were guided by the Chatham House Rule and were designed to capture candid, regionally informed feedback on critical issues impacting the mineral exploration sector— including the Mineral Claims Consultation Framework (MCCF), Mineral Tenure Act (MTA) reform, and broader industry challenges.

In total, 117 attended AME's town hall meetings in February 2025:

- Cranbrook – 11
- Nelson – 19
- Smithers – 8
- Kamloops – 11
- Vancouver – 18
- Nanaimo – 9
- Online – 41

Participant feedback was anonymized and analyzed thematically to produce this report. In parallel, AME conducted a member survey to collect quantitative data on permitting timelines, investment levels, and other key indicators across active projects.

Appendix B: Member Survey Comments

Surveys were completed by 26 AME members (20 individual; 6 Corporate). This survey asked for top three concerns regarding the January 2025 draft Mineral Claims Consultation Framework. The anonymous responses follow:

> Increased cost to tenure acquisition/early-stage exploration will be prohibitive to new investment in the province.
>
> The process will disproportionately favour large mining companies over small startups as they can more easily afford the longer timescales and higher costs.
>
> As a project generator I cannot afford to make an initial investment in staking and consultation without certainty I can proceed with exploration. The business just doesn't work that way.

> Cost and certainty - The current draft framework does not specify when payment would be required from proponents, or if a refund will be issued if the claims are denied. If payment is required at the start of the process, it could reduce staking to effectively gambling, which is an unacceptable risk.
>
> Timelines and scope - The currently proposed timeline would see a best-case scenario of 90 days to acquire new claims. Given the extensive scope of proposed engagement and existing issues with permitting, I have no confidence it will be possible to adhere to those timelines and expect we will see staking times extend to many months or over a year. This would make it impossible to rapidly innovate and test new exploration models in BC. The only possible solution I see would be to implement a more proportional level of engagement that does not require extensive back-and-forth between stakeholders, like the current Section 19 landowner notification.
>
> Transparency and Consent - The currently proposed framework does not include any clarity on how decisions on whether to approve a claim will be made and implies that those discussions would occur behind closed doors. This is simply unacceptable. There needs to be a clear, public set of criteria for now decisions are made, and the full decision process needs to be openly shared with the proponent (see point 1 about reducing the staking process to gambling). The option to deny claims also strongly suggests this is a consent-based process, not simply consultative.

> What happens to claims that receive a negative decision? Does that area remain open for other claim applicants on MTO?

> Consultation processes may vary" - Will this still adhere to the 30 days provided to First Nations for initial response?
>
> Can registered, but not approved claims ever be staked again if they are rejected initially?
>
> Are there limits on what Accommodation Measures may involve? (i.e. will they be environmental action, equipment restrictions, cash payments, etc.?)

> Asked by another concerned free miner to submit these, and I concur:
>
> How are they going to handle very minor claim changes e.g. acquisitions of fractions, or lapsed claims. Does every minor change require a new consultation?
>
> What sort of accommodations will be considered? Simple limited technical conditions? Or are they thinking of more complex accommodations like: requirement to have an exploration or other agreement, make payments, enter commercial partnerships, establish no go zones within tenures, require archaeology or cultural studies (with some sort of specifications?), etc. Some of this could require many months or even years to complete or negotiate....
>
> When will payment be due for claim registration? Before or after consultation? What if the proponent cannot live with the conditions or accommodations proposed by government or First Nations? How is it resolved or negotiated?

“ Long and open-ended timeframes that are not workable for many prospectors/explorers.

Sharing confidential intellectual property and applicant information that could introduce bias and preferential treatment.

Delays and uncertainty that will cause investors to look at other jurisdictions. ”

“ Timelines for consultation must be reasonable; 120 days is too long. 90 days maximum would be better.

Agree that the Nations must have the financial and human resources to fulfill their component of the process.

I do not think that batch processing is the answer. How can you be fair to those that submit early? I think the clock starts running on the timeframe and the consultation as soon as the claim is applied for. ”

“ Delay in obtaining title

Requirement to provide exploration plans prior to obtaining title

Unreasonable conditions on scope of exploration or unreasonable denial of title ”

“ Confidentiality.

Should not consult First Nations until NoW filed, waste of everyone’s time if you end up dropping the claims, most often the case.

Another year of red tape! I know it’s supposed to be 90 to 120 days but never is! ”

“ The risk of extended timeframes before granting of title

Risk that First Nations are overwhelmed by process and do not have resources to handle the process.

Risk that First Nations use the process as a de facto veto on exploration in territories that might be claimed by multiple First Nations, and/or use their consent to reject claimants unless financial incentives are provided. ”

“ The BC government has still not told FMC holders how this will actually work yet.

The govt has proposed 90-120 referral time for claim acquisition which is ridiculous

The government said they would be showing FMC holders how the new MTO acquisition would work and help people learn to use it, NO link exists yet ”

“ Exploration will move to other provinces, or countries.

The NDP were not mandated to make this change - call a referendum!

The concept is theft of Intellectual Property and exploration in BC will Decline - new mines will cease to be found - taxes and benefits to First Nations will slowly disappear. ”

“ Creates additional uncertainty which will drive investors to other jurisdictions

The entire “consultation” process has been non transparent and very poorly managed; although it is clear that there has been extensive consultation/ meetings/engagement with First Nations, that started well before the court decision, the same level of engagement has not been offered to FMC holders or exploration companies; an example of this would be the batching process for applications: I doubt that anyone that acquires claims would ask for the approval process to be slower.

The long timelines could make it difficult to get assessment work done within a year of the application being granted. Example: the application is made on May 1 for a claim that is high elevation, and only snow free from July to September. The application is batched (30 days), consultation (30 days) an additional 15 days for non-response (15 days), accommodation (60 days) adds up to 135 days which means you have missed the opportunity to carry out work on your claims. The application is made May 1; the application is approved on Sept.13. And this is assuming there are no accommodations attached to the claim. ”

“An absolute bureaucratic nightmare that does nothing to further mineral exploration in BC. How much input did the mining industry have in the court case that precipitated the need for a consultation? ”

“Expediency, Confidentiality, Competitiveness ”

“The time delay and potential lost opportunity impacts this change will bring about especially when coupled with the time it takes to receive NoW permits. The lead time for taking an idea to testing it in a meaningful way on the ground is already so long that investor interest wanes and momentum is lost and often does not recover for prospectors and junior explorers.

The risk of not receiving the ground that was applied for, either at all or in part and the potential for nefarious groups to have influence or play favorites. Even if rejected claims get greyed out and can’t be staked by another party, how long before the entire province is a blank map never to be staked again?

This change takes investor uncertainty to a whole new level for the mineral exploration industry and with all the permitting difficulties we face, it could be the final nail in the coffin for BC mining. ”

“It was rushed, and its drafting did not meet the province’s obligations to consult under the Declaration on the Rights of Indigenous Peoples Act which was their goal.

The new framework will add at least 60 days in consultation time to a mining permitting process that is already dogged with delays

The BC HSRC already has pre-engagement with First Nations for a Notice of Work to do exploration in their area, so requiring engagement for a mineral claim is ludicrous and unnecessary and also will cause trouble for the Nations to actually respond. ”

“They perpetuate the business of victimhood destroying our business. Different rights for different groups is not a country. We are not responsible for the actions of earlier groups. Investment will go elsewhere. ”

“Spurious concerns often intent on discouraging mineral exploration.

Unworkable time delays in the granting of permissions chain to proceed with early-stage exploration.

Opportunities for Indigenous full participation in the early stages of exploration - this needs to be proceeded by training of interested entities, which the BC minerals industry should fully endorse. ”

“Even just a quick review of what we want to stake does not work. Claims must be able to be obtained quickly and securely. We must know what land is available to be staked prior to staking. A lot of time, energy and $ are spent researching targets. Only the majors can be functional with this, and they do not find mines, they buy them.

The long consultation process makes staking useless. AME should be supporting exploration, not hindering. ”

“Overlapping Indigenous land claims will impact timely decisions, what are the dispute mechanisms for this

Indigenous groups can object, allow claims to lapse, then stake area themselves,

Indigenous groups can accept money from foreign or environmental organizations money to say no, this is bribery..... ”

“There is NOTHING in the consultation framework regarding EVERYONE, including First Nations having strict confidentiality requirements once the consultation begins. Because exploration plans are usually based upon proprietary knowledge, it is incumbent that the knowledge and plans be protected to prevent competing companies, individuals, and First Nations from potentially using that information (more than just the cells involved) to stake land around the cells. The issues is simply time you need to wait to put “boots on ground, or aerial surveying etc.” and announcing those plans IN YOUR application allows time for competitors to zero in on your property and its potential. Due to cost of staking and maintaining, companies and individuals do not

always stake everything possible and use the time between initial claim staking and needing to do a Mines Act Permit to figure out whether to increase the land package, decrease, or otherwise. The protection of your plans for the period PRIOR to requiring a Mines Act Permit for activities is the type of proprietary information that is not protected under this scheme.

It is NOT necessary to "batch" claims monthly. It simply adds time to the review of up to 30 days. Once the claim application is received, it should be processed and IMMEDIATELY upon completion of the consultation package it should be sent to the affected First Nations. There has to be a method of protecting the First Application Claimant's space in the order and that claims are reviewed IN THE ORDER RECEIVED, not by monthly batching. ”

“ Not right what the government is doing. ”

“ Consultation before staking.

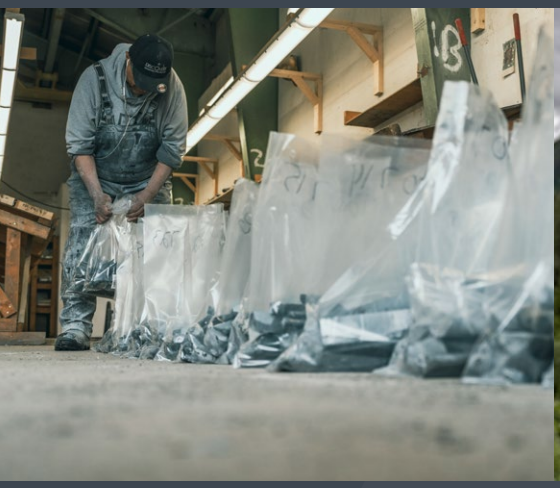
Time taken for Notice of Work.

First Nations giving notice to surrender all claims in their area besides the Consultation Framework. ”

“ It will add uncertainty to the process, leaving the determination of claims open for vetoes or red tape.

This will prevent grassroots staking and push out small and medium sized operations due to the risks (investment and time put into claims) being far too high without any guarantees.

All that added risk aside, even if a claim were to initially be approved there is no guarantee that the First Nations will even engage in the consultation and/or not try to prevent the process from moving forward after the claim is staked. Essentially this is asking industry to take on only risk with not even a glimmer of hope at the end. ”



Association for Mineral Exploration

Suite 800, 889 West Pender Street
Vancouver, British Columbia, V6C 3B2
Tel. 604 689 5271

info@amebc.ca • @AME_BC
www.amebc.ca