

12-Month Review of the Mineral Claims Consultation Framework

Prepared by Purple Rock Inc.

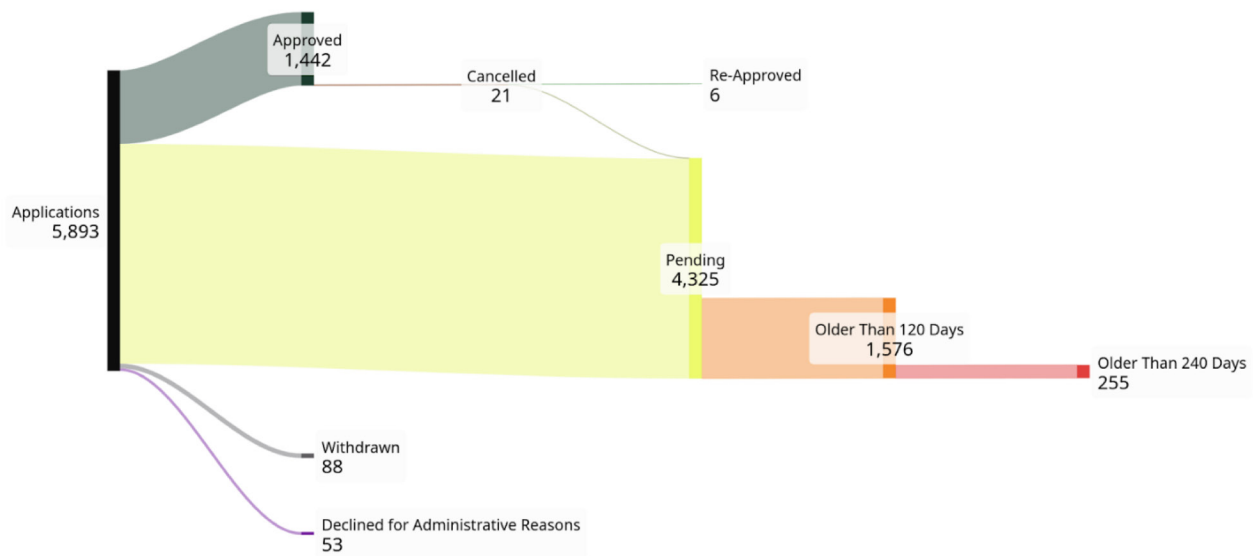
For: Association for Mineral Exploration - British Columbia

Lindsay Richards, BSc, Nicole Barlow, P.Geo, James Barlow, P.Eng

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Summary



Status of mineral and placer applications submitted under the MCCF from March 25, 2025 to March 24, 2026.

The Mineral Claims Consultation Framework (MCCF), introduced in March 2025, changed how mineral claims are acquired in British Columbia by replacing ‘free-entry’ staking with an application process that includes consultation with First Nations. This shift was made to meet legal obligations established by the 2023 *Gitxaala v. British Columbia* (Chief Gold Commissioner; 2023 BCSC 1680) BC Supreme Court decision. The MCCF establishes a process for mineral claim staking that is in compliance with the Province of British Columbia’s obligations under Section 35 of the *Constitution Act, 1982*.

During its first year, the MCCF experienced long processing times that continue to increase. Of the 5,983 applications tracked in this study, only 1,427 have been approved (excluding some which were approved and later cancelled), leaving more than 4,300 still awaiting decisions. The median time to reach a decision is approximately 149 days, exceeding the Province’s stated target of 90–120 days. Less than 15% of applications are processed within the target timeframe, and the number of applications submitted has consistently exceeded the number processed, contributing to a growing backlog. These delays have significantly impacted the number of claims issued; the mean number of claims issued per week since the MCCF was implemented is 79% below the baseline.

The introduction of the MCCF also coincided with changes in staking patterns. Following implementation, both the number and size of new claims declined, particularly for mineral claims. Although the number of mineral claims staked has recovered over time, the average size of mineral claims staked remains well below the baseline. Claims are generally smaller and appear more closely aligned with commodity price trends than in the past. Placer claims by contrast have increased in both size and number since the implementation of the MCCF, possibly due to strong gold prices.

Although the MCCF is compliant with the court decision, it has introduced serious new challenges and roadblocks for explorers. Long, unpredictable timelines, reduced confidentiality, and unclear processes all make it harder for explorers to plan projects and raise money. Claim staking in BC, a once instantaneous and confidential process, has become a lengthy and uncertain regulatory system. These changes have serious implications for BC’s mineral exploration industry. Longer approval timelines may affect the ability of explorers to carry out work within seasonal windows and other deadlines. Sustained delays and reduced rates of claim issuance could influence the number of projects advancing through the exploration pipeline over time. The findings in this report indicate that the MCCF is not currently meeting its stated service standards. Immediate intervention is needed to improve performance and ensure a sustainable claim staking system for British Columbia.

Introduction

On March 25, 2025, the Province of British Columbia (BC; “the Province”) implemented the Mineral Claims Consultation Framework (MCCF), substantially changing BC’s mineral claims process. The change was met with concern by the Association for Mineral Exploration British Columbia (AME) and members of the mineral exploration industry. Prior to the MCCF, any person with a Free Miner’s Certificate (FMC) could directly stake claims online. The MCCF replaced this ‘free-entry’ staking system with an application process designed to meet the legal requirements imposed by the 2023 *Gitxaala v. British Columbia* (Chief Gold Commissioner) BC Supreme Court decision (*Gitxaala v. British Columbia* [Chief Gold Commissioner], 2023), which found that the Province has a duty to consult with First Nations prior to issuing any mineral claims. Industry concerns surrounding the new system included capacity, intellectual property protection, and, in particular, timeline delays.

AME retained the services of Purple Rock Inc. to provide independent data collection, monitoring, and analysis of the MCCF’s performance and impact on industry; this report contains the results of that analysis. Purple Rock tracked key performance indicators such as the number of applications submitted, number of claims approved, and the time for decisions to be issued; compiled historical data on claim staking trends dating back to March 2020; and compared staking behaviour since the MCCF was implemented to a baseline defined by the period from June 2022 to November 2024. This period is representative of staking behaviour following the initial impacts of the COVID-19 pandemic and prior to the announcement of the MCCF implementation.

The number and size of claim applications staked in BC immediately following the implementation of the MCCF were much lower than the post-COVID baseline. Although the number of claim applications staked has since rebounded, the MCCF has not yet met the Province’s stated target timelines for application processing. The data collected over the past year indicate that there is a steadily growing backlog of applications and that approval times continue to increase. If immediate action is not taken to improve processing times, these delays could have major negative impacts on BC’s mineral exploration industry.

Background

Mineral Claims in BC

Mineral Claims in BC are governed by the Mineral Tenure Act and administered through the Mineral Titles Online (MTO) system, which comprises a database of mineral tenures and a web interface through which users apply for and manage tenures. Since 2005, British Columbia’s ‘map staking’ process means that no physical claim stakes are required and claims can be staked remotely at any time. Prior to the MCCF, claims were valid immediately upon staking. In the new framework, staking a claim starts an application process that is subject to approval after government consultation with First Nations. Until approved, a claim application grants no exclusive rights or protection to the minerals within the claim. Once a claim application is submitted, it immediately becomes publicly visible through MTO.

Modern claims are delineated based on the Mineral Titles Grid system (usually referred to as the ‘MTO grid’), which is derived from the National Topographic System (NTS) mapsheet grid (BC Mineral Titles Branch, 2025). Each cell in the MTO grid ranges in area from approximately 21 ha in the south of the Province to 16 ha in the north. A claim may comprise one or more contiguous cells. Two types of claims may coexist within each cell: Mineral Claims, which grant the right to minerals within the bedrock, and “Placer Claims”, which grant the right to minerals found within unconsolidated sediments. Placer claims are restricted to a number of Designated Placer Areas within the Province, and cannot be registered elsewhere. The term mineral claims is also broadly used to refer to both mineral and placer titles. The cost of staking claims is based on the total area and claim type: \$1.75/ha for mineral cells and \$5.00/ha for placer cells.

Claims are valid for one year after their issue date. To extend the validity of a claim, the owner must perform mineral exploration assessment work on it or pay cash in lieu of work. The value of work needed to maintain a mineral claim increases biannually and is also based on the size the claim: \$5.00/ha in years 1 and 2, \$10.00/ha in years 3 and 4, \$15.00/ha in years 5 and 6, and \$20.00/ha for year 7 and each subsequent year (BC Mineral Titles Branch, 2025). Placer claims require a fixed work value of \$20.00/ha per year. Cash-in-lieu payments are double

the required assessment work value. Any work performed on a claim application prior to its approval cannot be used for assessment credit.

Most advanced mineral exploration work requires additional permits under the Mines Act and may require additional permits governed by other provincial regulations, such as for water use. Without a permit under the Mines Act, tenure holders can conduct basic non-invasive surveys such as geological mapping, soil sampling, and geophysical surveys without exposed electrodes. More invasive work such as drilling, line cutting, and mechanical trenching all require additional permits, which triggers additional Indigenous consultation beyond that required by the MCCF.

Mineral Claims Consultation Framework

The MCCF was implemented in response to the 2023 *Gitxaala v. British Columbia* (Chief Gold Commissioner) BC Supreme Court decision (*Gitxaala v. British Columbia* [Chief Gold Commissioner], 2023), which established that the Province of British Columbia has a duty to consult with First Nations prior to issuing mineral claims. The new framework is compliant with the Province's obligations under Section 35 of the *Constitution Act, 1982*. The MCCF eliminated automatic granting of mineral claims in favour of a system in which claim applications are submitted to the Province and then, to fulfill the duty to consult, are sent to all First Nations who have registered an interest or claim in the region. First Nations have 30 days to respond to each application. If First Nations do not respond to an application within that time, the application returns to the BC Ministry of Mining and Critical Minerals, and the decision to approve or deny the claim is made. If First Nations express concerns about an application, this triggers a process of consultation with First Nations and the applicant to develop accommodations, after which the decision to grant or deny the application is made by the Ministry. The target timeline for consultation is 30–60 days, but may be extended. The BC Ministry of Mining and Critical Minerals has stated that they are targeting a turnaround time for claim applications of 90–120 days or faster (BC Ministry of Mining and Critical Minerals, 2025a, b).

During the year prior to the implementation of the MCCF, members of the mineral exploration and mining industry raised concerns about potential impacts on the industry, many of which are highlighted in AME's 2024 What We Heard report (Association for Mineral Exploration BC, 2024), and 2025 Town Hall Report (Association for Mineral Exploration BC, 2025a). Principal among these concerns were a strong feeling of uncertainty as to what impact the MCCF would have on explorers in BC. Members of AME outlined the following as principles to advocate for and that the industry supports (Association for Mineral Exploration BC, 2025b):

- Reasonable timelines for consultation and decision-making
- Best efforts on engagement
- Transparency in decisions and decision-making by making the information publicly available
- Treating all participants with fairness and without prejudice
- Confidentiality for applicants and their projects
- Government must ensure that First Nations have financial capacity to engage in the consultation

During the engagement and consultation process that took place while the MCCF was being developed, First Nations expressed concerns relating to the following themes (BC Ministry of Mining and Critical Minerals, 2025c):

- Financial and timeframe capacity of First Nations to support the incoming applications
- Ensuring alignment with the United Nations Declaration on the Rights of Indigenous Peoples
- Ensuring a clear dispute resolution process
- The need for capacity support to facilitate the consultation stage
- Tight consultation timelines
- Alignment with other agreements
- Proactive land use planning to identify cultural and environmental no go zones
- Decision transparency around how First Nations input influences decisions
- The impact of the MCCF on Aboriginal Title

Importance of Mineral Claims to Exploration

Mineral exploration is a high-risk industry. The odds of any individual mineral discovery becoming a mine are on the order of one in a million (Stevens, 2010). As such, continuous testing of new concepts and targets is critical to the industry's success. Mineral claims serve as intellectual property for explorers, enabling them to secure the mineral rights to a potentially prospective area and testing their theories before publicly disclosing their geological concepts.

Easy access to mineral claims is critical in the earliest 'greenfields' stage of exploration, during which a concept may not yet be proven and significant investment in a project may not be justified without further evidence. Prospectors stake mineral claims, evaluate the potential, and use their findings to raise money or sell the claims to a larger company, which conducts more advanced exploration. That said, most concepts never prove out and those claims lose their value and are usually dropped. If prospectors and small companies cannot access mineral claims in a reasonable timeline, it will block early prospects from advancing through the exploration pipeline. That, in turn, could lead to a future shortage of advanced exploration projects when the current generation of advanced targets reach production.

Industry Concerns

In reports generated by the AME in 2024 and 2025 (Association for Mineral Exploration BC, 2024, 2025a), explorers highlighted their concerns about the MCCF's potential impact on the industry, including

- overall uncertainty of how the new process would work, especially related to declined applications and accommodations;
- transparency and public accountability;
- disclosure of intellectual property (the location and ownership of claim applications) without guaranteed protection;
- fairness of approval decisions;
- long target timelines, which could prevent access to some areas in the same year an application is submitted due to weather windows; and
- capacity of Government and First Nations to process applications within the target timeframes.

Methods

Data Sources

The full MTO database is not publicly available for download; however, geospatial data for mineral tenures can be downloaded from the BC Data Catalogue (Mineral Titles, 2025). This dataset contains key information for every valid tenure at the time, including the date a tenure was issued, ownership and tenure type. Updates to the BC Data Catalogue are made nightly, with a 24-hour delay, so data downloaded on August 10 would contain tenure data up to August 9. A dataset of historical mineral tenures is also available; however, it does not include date information, which made it unsuitable for this study.

Because the BC Data Catalogue only shows tenure status at that moment, it is not possible to see changes in claims and tenures over time without comparing to previous versions, or 'snapshots'. Each snapshot shows the status of all claims in BC at that moment. To make comparison possible, Purple Rock compiled previously downloaded data snapshots. Data snapshots downloaded prior to December 2024 were obtained from AME members (anonymous AME members, personal communication, 2025); whereas those downloaded between December 2024 and March 25, 2026 were collected by Purple Rock directly. In total, 58 snapshots of tenure data were obtained (Table 1).

Table 1: Tenure data snapshot dates.

Snapshot Number	Date	Days Since Previous Snapshot	Snapshot Number	Date	Days Since Previous Snapshot
1	2020-03-29	earliest obtained	30	2025-07-25	5
2	2020-04-01	3	31	2025-08-02	8
3	2021-01-31	305	32	2025-08-06	4
4	2021-06-23	143	33	2025-08-14	8
5	2021-08-27	65	34	2025-08-21	7
6	2021-11-08	73	35	2025-08-29	8
7	2022-02-07	91	36	2025-09-05	7
8	2022-04-21	73	37	2025-09-13	8
9	2022-06-18	58	38	2025-09-22	9
10	2022-08-24	67	39	2025-10-02	10
11	2023-01-30	159	40	2025-10-06	4
12	2023-05-10	100	41	2025-10-20	14
13	2023-09-06	119	42	2025-10-29	9
14	2023-11-15	70	43	2025-11-12	14
15	2024-02-15	92	44	2025-11-18	6
16	2024-06-24	130	45	2025-11-26	8
17	2024-12-07	166	46	2025-12-02	6
18	2025-01-18	42	47	2025-12-09	7
19	2025-02-22	35	48	2025-12-25	16
20	2025-03-14	20	49	2026-01-06	12
MCCF Implemented 2025-03-25 - 11:30 AM			50	2026-01-14	8
21	2025-03-27	13	51	2026-01-21	7
22	2025-04-06	10	52	2026-02-03	13
23	2025-04-17	11	53	2026-02-10	7
24	2025-05-09	22	54	2026-02-18	8
25	2025-05-20	11	55	2026-02-25	7
26	2025-05-28	8	56	2026-03-13	16
27	2025-06-27	30	57	2026-03-24	11
28	2025-07-05	8	58	2026-03-25	1
29	2025-07-20	15			

Omitted Data

A validation check on the final database of tenure issuances identified two duplicate tenures:

- 1077331, which occurs in two snapshots due to an estate expiry date extension (the newer record was omitted from the analysis to reflect the claim's original issue date), and
- 1115120, which occurs as a duplicate record in the original tenure data (one of the duplicate records was omitted).

One duplicate application, 1123070, was identified and the duplicate omitted from the analysis.

Two tenures, 1123109 and 1127661, were omitted from the dataset of approved claims because they are manual reinstatements of older claims.

Six tenures were excluded from the approval dataset, because they were cancelled and subsequently reinstated, resulting in duplicate records. Cancelled claims are discussed further in the Cancelled Approvals section below.

Determining Historical Staking Rates

The first step in preparing historical tenure data was to exclude all tenures issued earlier than March 29, 2020, which is the start of the data analysis window. Then, each subsequent snapshot was filtered to only display tenures issued since the preceding snapshot. This step is important because MTO frequently issues new tenure ID numbers through events such as amalgamation and subdivision; these are not actually new claims. To ensure only new claims were counted, a spatial difference calculation was performed between each snapshot, which produced a map and list of new tenures issued over the intervening period. Those data were merged to produce a single database of historical tenure issue dates between March 29, 2020 and March 25, 2025.

Baseline Period

To assess the impact of the MCCF on claim-staking behaviour, the analysis used a baseline period ('the baseline') from June 2022 to November 2024. In January 2022, a very large number of cells were released in MTO, resulting in several months of anomalously high staking activity. Similarly, a large staking rush preceded the implementation of the MCCF in early 2025. The selected baseline period excludes both these staking rushes and represents normal staking activity from the end of the COVID-19 pandemic to prior to the beginning of the MCCF's influence.

Determining MCCF Decisions

Under the MCCF, claim applications are either approved and a tenure issued, withdrawn by the applicant, or declined. To determine the number of approved claims and declined or withdrawn applications, a combination of spatial overlay analysis and filtering was performed using QGIS. To produce a cohesive database of claim approvals, 38 snapshots of tenure data collected post-MCCF implementation were analyzed using the following tenure approval calculation (Figure 1).

The tenure approval calculation compared sequential snapshots of tenure data to ensure that claims were only counted once. First, mineral and placer claims were split and processed in parallel. This was necessary because later steps in the calculation checked for overlapping claims, and mineral and placer claims may occupy the same MTO cell. Then, the older tenure snapshot was filtered to only show applications, and the newer tenure snapshot was filtered to only show tenures issued during the period since the previous snapshot.

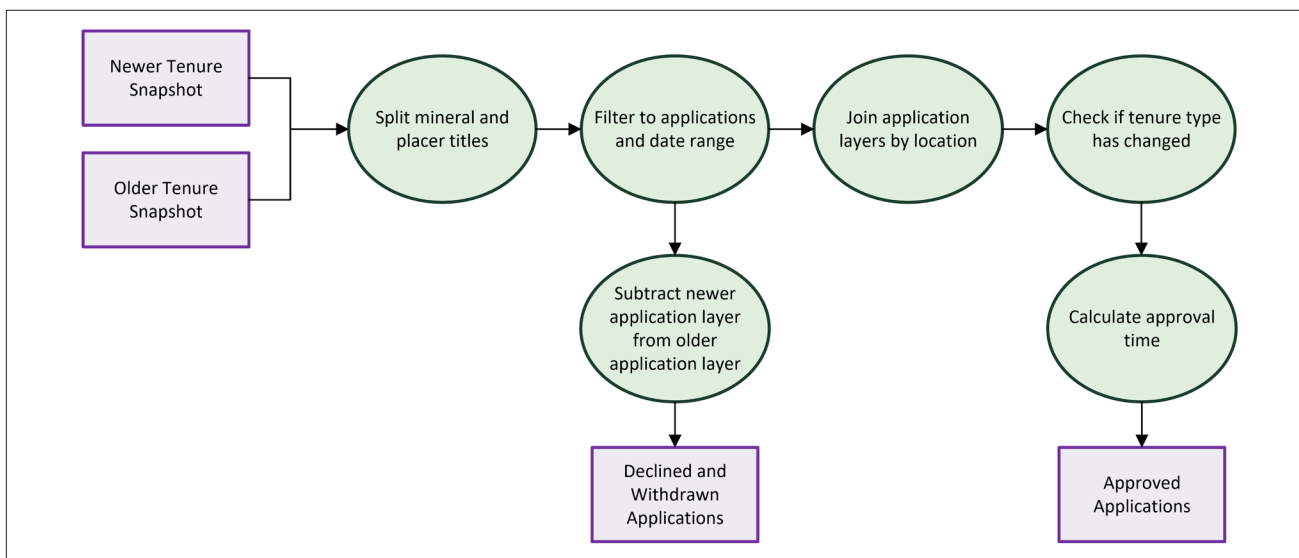


Figure 1. Simplified application approval calculation workflow.

Approved Claims

Several steps were needed to determine which applications were approved since the previous snapshot due to how applications are handled in MTO. When an application is approved, the original record (the application) is removed from the tenure data, and a new tenure is issued, linked by an event number within the MTO database. This process is analogous to tenure amalgamations and subdivisions; however, it means that claims cannot be directly linked to their application by a unique identifier.

Instead, approved claims were identified spatially. The attributes of each layer were joined by location, with the suffix 'new_' appended to the more recent snapshot. A series of filters were used to check if the tenure number, issue date, and application subtype had changed, and to exclude any claims moved forward by assessment work or cash in lieu since the previous snapshot. If the tenure number and/or issue date had changed, but the application subtype had not, this indicated that an application was withdrawn and a new application was submitted in the same location. If the application subtype, issue date, and tenure number had all changed, this indicated that the claim was approved on the 'new' issue date. Finally, the length of time for approval and area of the approved claims were calculated.

Declined and Withdrawn Claims

A spatial difference calculation was used to determine if any applications present in the older snapshot were absent from the newer one. The resulting list contained all claims that were declined or withdrawn. To further split this list into those that were declined and those withdrawn, and to determine the reason, each tenure was manually reviewed in MTO.

Claims that received an 'administrative' decision, such as an intervening titles deletion per section 67 of the Mineral Tenure Act, are not considered for calculating decision rates and approval times. These claims would also have been cancelled prior to the MCCF, and as such are not representative of the new application process.

Cancelled Approvals

In October 2025, a number of claim applications received approvals that were then cancelled and returned to a pending application status following errors during the consultation stage. These tenures were identified by:

- comparing the list of all approved claims to the list of pending applications and flagging approved claims that re-appeared as an application at a later date, and
- filtering the list of approved claims to identify duplicate application IDs with different approval times.

In total, this method identified 21 tenures for which approval was rescinded. At the time of this report, 6 of those 21 were subsequently re-approved, and the remainder are still pending.

Error and Limitations

Several edge-cases are not accounted for by the methods described above may cause small errors in the derived data:

- Extensions due to estate management are only accounted for when the tenure IDs appear in multiple snapshots. Since the standard extension is 12 months, this is normally apparent in the data, but any extensions shorter than the period between snapshots would not be visible.
- If an application is withdrawn and a previous tenure with an issue date prior to implementation of the MCCF is reinstated in its location, the tenure approval calculation may not identify it.
- Any changes that occur and are reverted between snapshot dates are not captured.
- Manual changes to tenure status, such as title protection, may not always be captured.

As a result of these limitations, the numbers presented in this report differ slightly from those directly derived from the MTO database; however, these differences do not affect the accuracy of the observed trends.

Results

Approved, Declined, and Withdrawn Applications

At the time of writing, 1,427 applications submitted through the MCCF have been approved. No claim applications have been declined for consultative reasons, and the authors are not aware of any approved claims that have had accommodations imposed as a condition of approval. A total of 53 applications were declined for administrative reasons, such as intervening titles per section 67 of the Mineral Tenure Act or system errors that allowed applications to be submitted within prohibited areas. A further 88 applications have been withdrawn by the applicant. Table 2 summarizes these data.

Table 2. Outcomes of mineral and placer claim applications in British Columbia since the implementation of the Mineral Claims Consultation Framework on March 25, 2025 to March 24, 2026.

Total Claim Applications	5,893
Applications Pending	4,325
Claims Approved (Excluding cancelled approvals that have not been re-approved)	1,427
Applications Declined for Administrative Reasons	53
Applications Declined for Consultative Reasons	0
Applications Withdrawn	88

Cancelled Approvals

In October 2025, 21 approved claims had their approval rescinded and were subsequently cancelled due to an error in consultation whereby some First Nations were not adequately consulted (J. Middleton, personal communication, 2025). Of those, 6 have since been re-approved, while 15 remain pending.

Decision Rates

Since the implementation of the MCCF, the processing time for decisions has been irregular. Figure 2 shows the number of applications submitted versus the number of non-administrative decisions. From May to September 2025, less than 50 applications were processed per week, and several weeks did not include any decisions. Near the 6-month anniversary of the MCCF, more than 1000 applications were processed during a 3-week period, followed by a 8-week gap due to a strike by the BC General Employees' Union (BCGEU) and Professional Employees Association (PEA). There was also a 3-week gap in decisions over the winter holiday season. Since February 2026, applications have been processed more consistently, generally at a rate of between 25 and 100 per week, with only one week of no decisions.

Figure 2 shows an aggregation of mineral and placer claim applications and decisions, and Figure 3 and Figure 4 separately show the mineral and placer claim applications and decisions, respectively.

Despite the increased consistency in decisions since February 2026, the number of applications submitted per week has consistently outpaced the number of decisions processed. As of March 24, 2026, there are 4,325 pending applications, of which 1,576 are older than 120 days. Figures 5, 6, and 7 show the backlog of total, mineral, and placer applications, respectively.

Timelines

As of March 24, 2026, the median time for claim applications to reach a decision was 149 days, excluding administrative decisions. The minimum time for an application to reach a decision was 52 days, and the longest was 284. Of the 1,442 approved claim applications (including those that were later cancelled), only 461, or 32%, were approved in 120 days or less; however, there are currently 1,576 pending claim applications older than 120 days. If these are included, only 14.8% of applications have been processed within 120 days. There are four applications still pending that were submitted on March 25, 2025; these are now more than a year old.

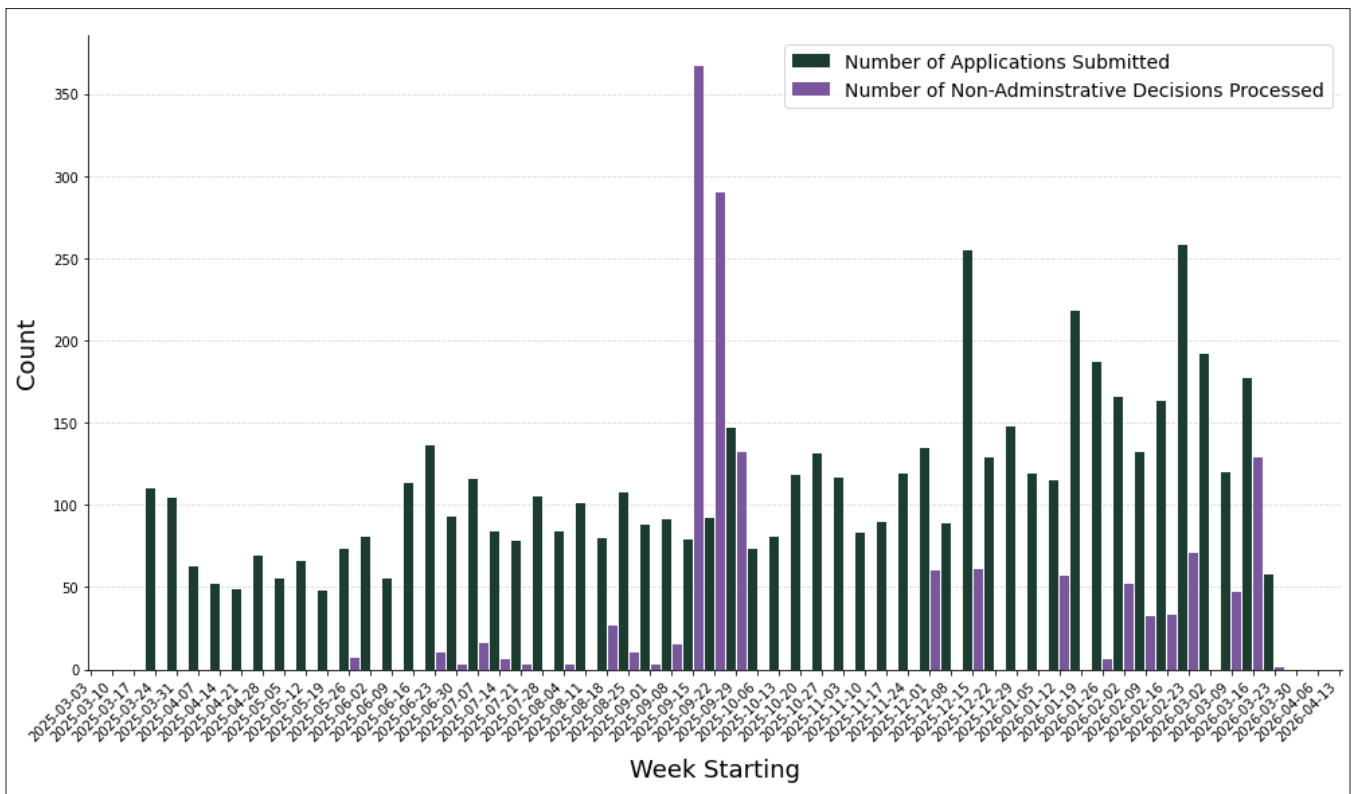


Figure 2. Number of mineral and placer claim applications submitted compared to the number of non-administrative application decisions processed per week in British Columbia from March 25, 2025 to March 24, 2026.

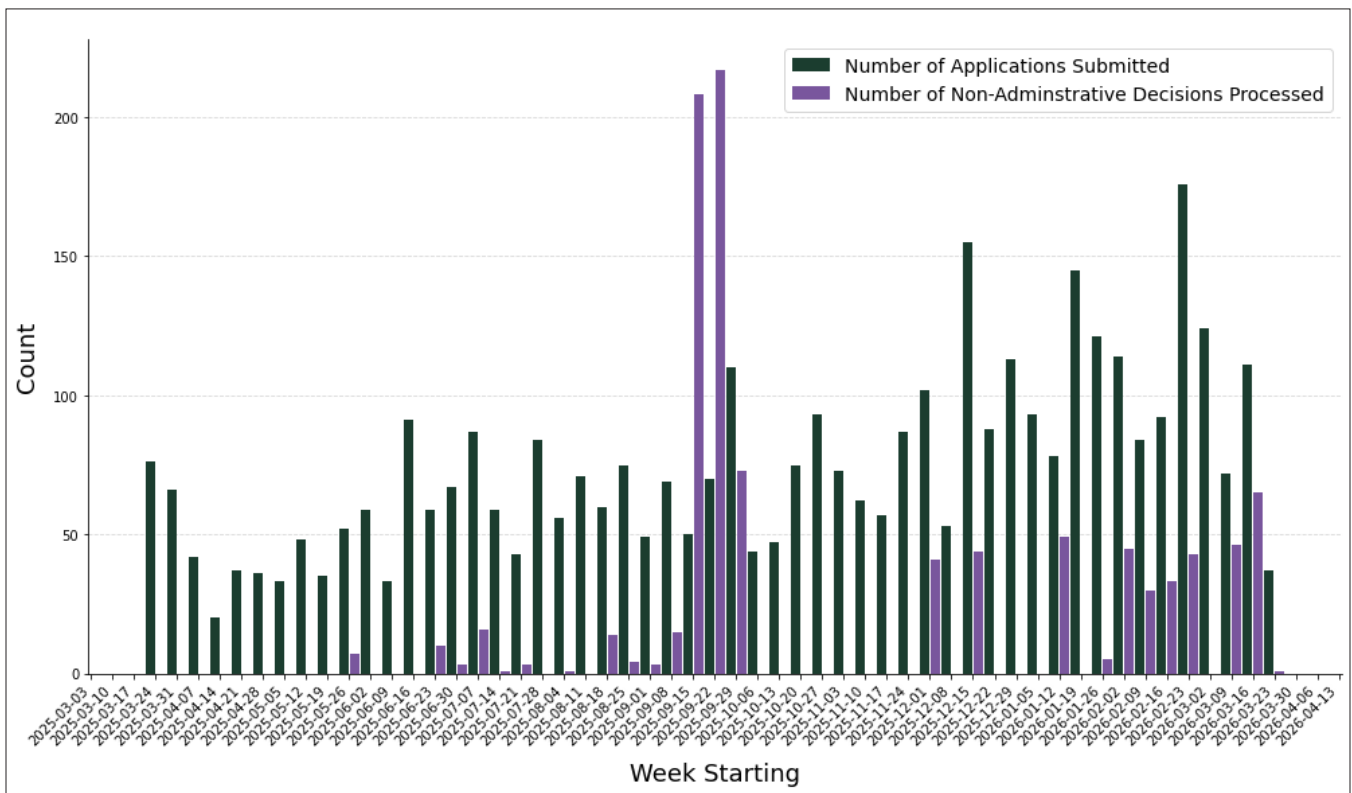


Figure 3. Number of mineral claim applications submitted compared to the number of non-administrative mineral application decisions processed per week in British Columbia from March 25, 2025 to March 24, 2026.

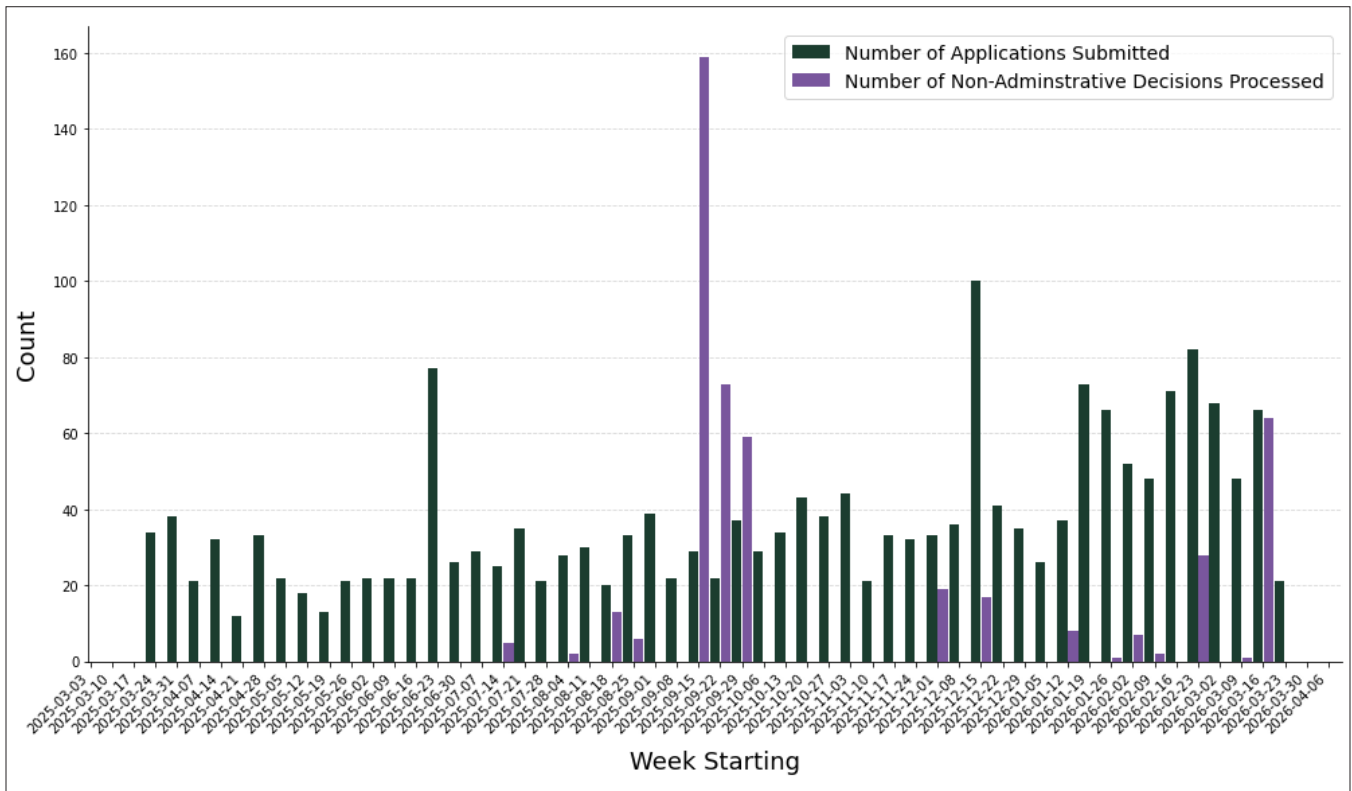


Figure 4. Number of placer claim applications submitted compared to the number of non-administrative placer application decisions processed per week in British Columbia from March 25, 2025 to March 24, 2026.

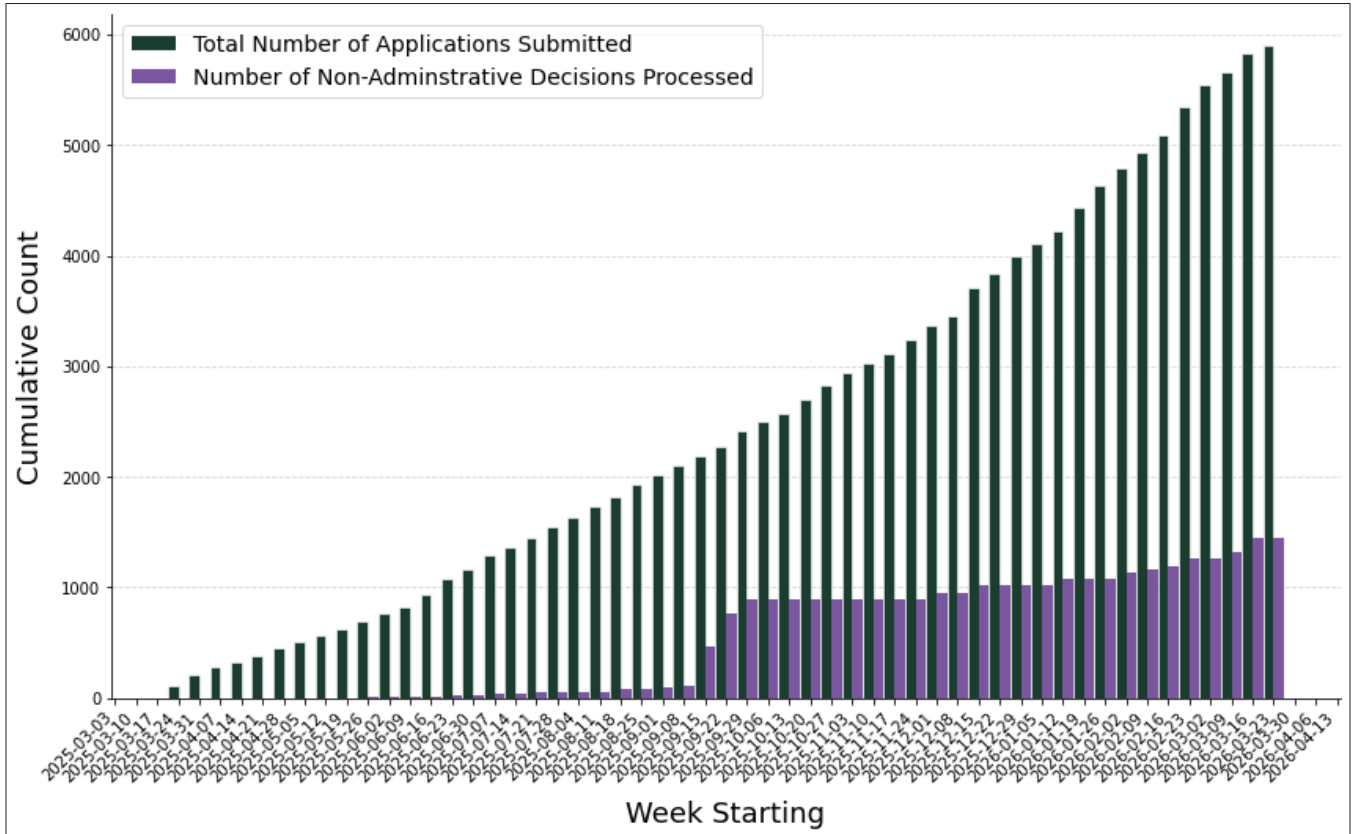


Figure 5. Cumulative number of mineral and placer claim applications submitted and non-administrative application decisions processed in British Columbia from March 25, 2025 to March 24, 2026.

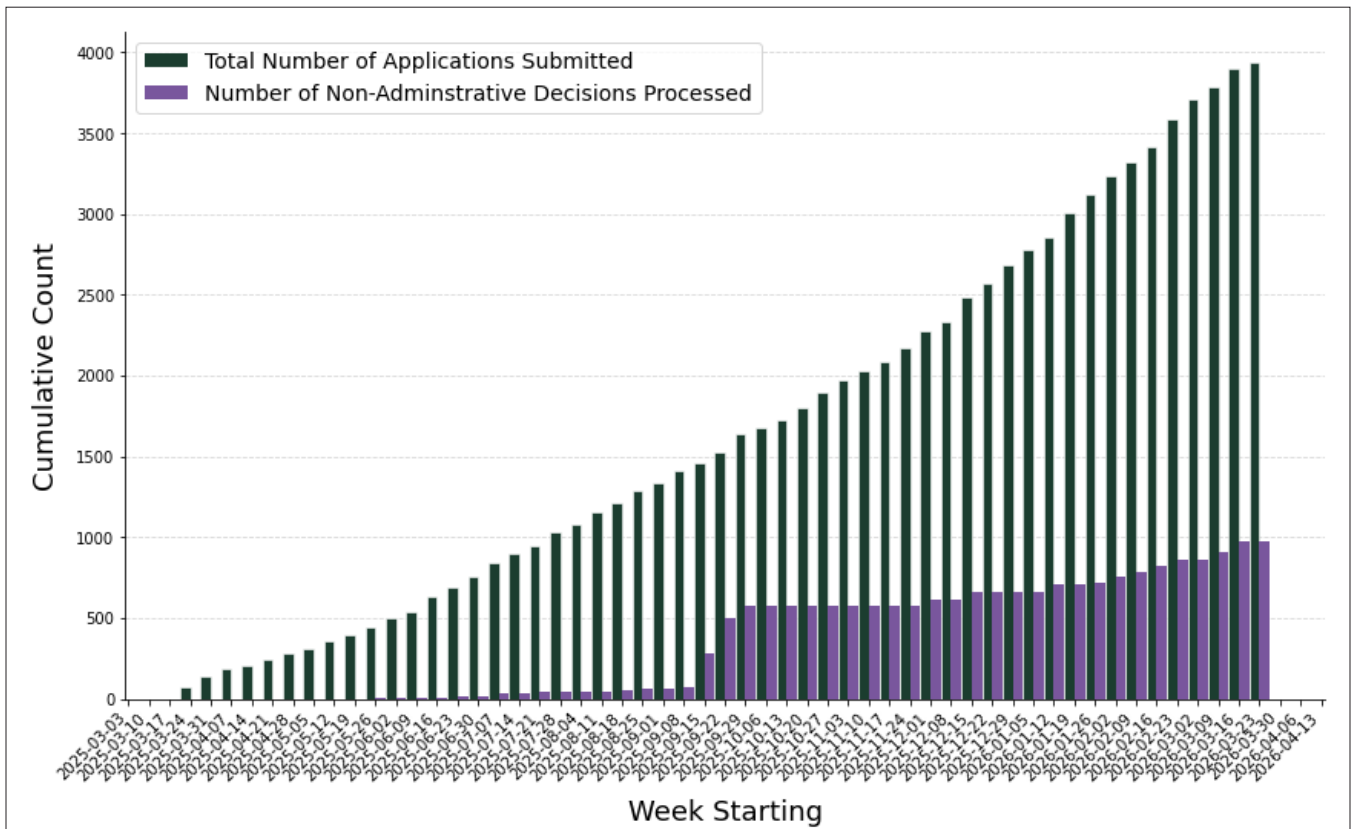


Figure 8 shows the average weekly decision time since the MCCF was implemented, excluding administrative decisions. Since December 2025, the average decision time has steadily increased, and no weeks have had an average decision time less than 120 days. Gaps in the data indicate periods during which no applications received a decision. The largest gap, from October to December 2025, corresponds with the BECGEU/PEA labour strike.

Figures 9 and 10 show the same data as Figure 8, divided into Mineral and Placer claims, respectively. Overall, the trends are similar between both types. Mineral claims have a median decision time of 151 days, compared to 142 for placer claims.

Staking Trends

Claim staking in BC is cyclical. High staking activity tends to be associated with cell releases and the staking of very large claim blocks, which often prompt a rush of smaller claims surrounding the large block. Staking rushes generally follow a predictable pattern: a sharp spike at the beginning, followed by a slow reduction in the number of claims staked as the best ground is acquired and interest wanes. The largest staking rush in the study period occurred in January 2022, when numerous cells that had been protected since the COVID-19 pandemic were released over several days. Subsequent cell releases also generated large spikes in staking activity. The impact of the MCCF on claim-staking behaviour was assessed by comparing the median weekly count and area of claims staked, and mean number of approved claims to the baseline period from June 1, 2022 to November 30, 2024.

Number of Claims Staked

Figures 11 to 13 show the number of claims staked and applications submitted from March 29, 2022 to March 24, 2026. Black lines show the median, first, and third quartiles from the baseline period. Staking trends are cyclical and correspond to events such as MTO cell releases, spikes in commodity prices, and data releases.

During the baseline period, the median number of claims staked was 82 per week and 501 per month; however, this number fell sharply after the implementation of the MCCF. The total number of claims staked remained in the first quartile for 4 months and below the median for 8 months. This trend was mostly driven by mineral claims, which followed the same pattern of reduced staking. Placer claims were less impacted and only remained below the median for two months.

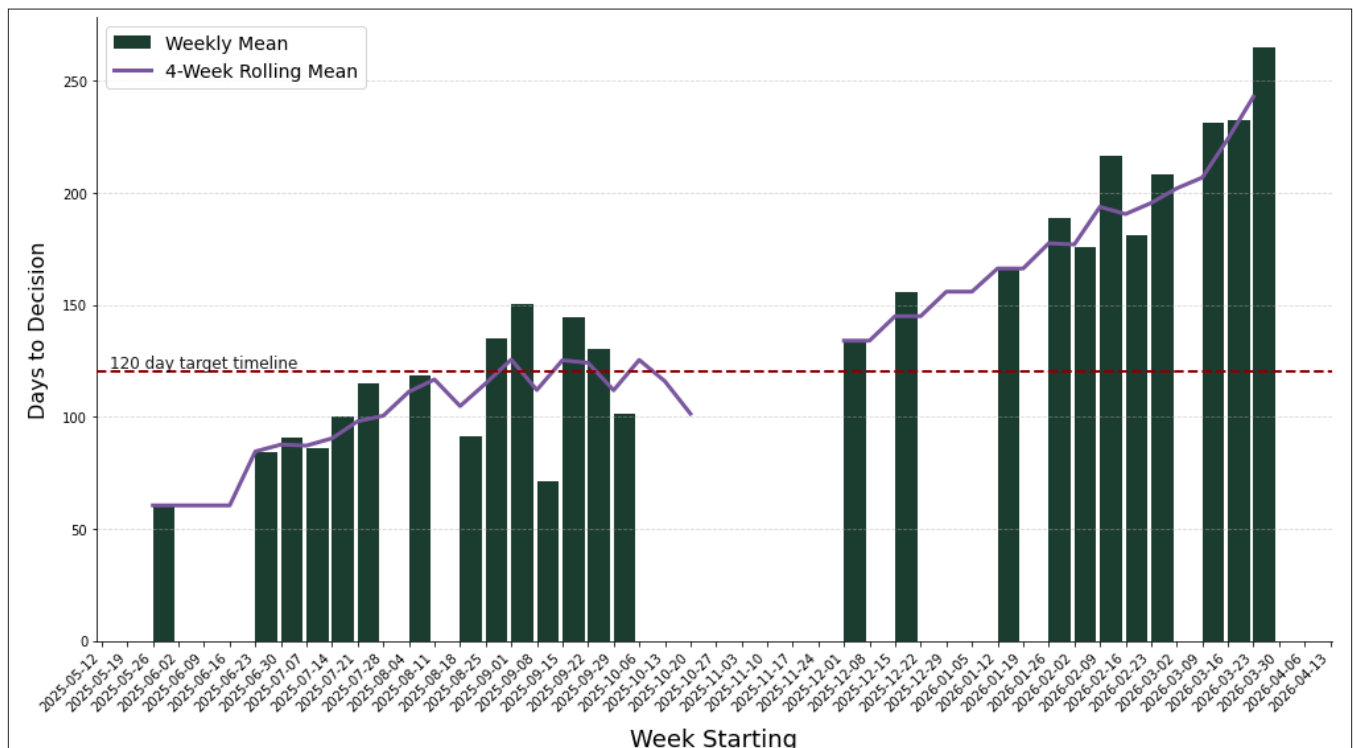


Figure 8. Weekly average decision times for mineral and placer claim application decisions in British Columbia from March 25, 2025 to March 24, 2026.

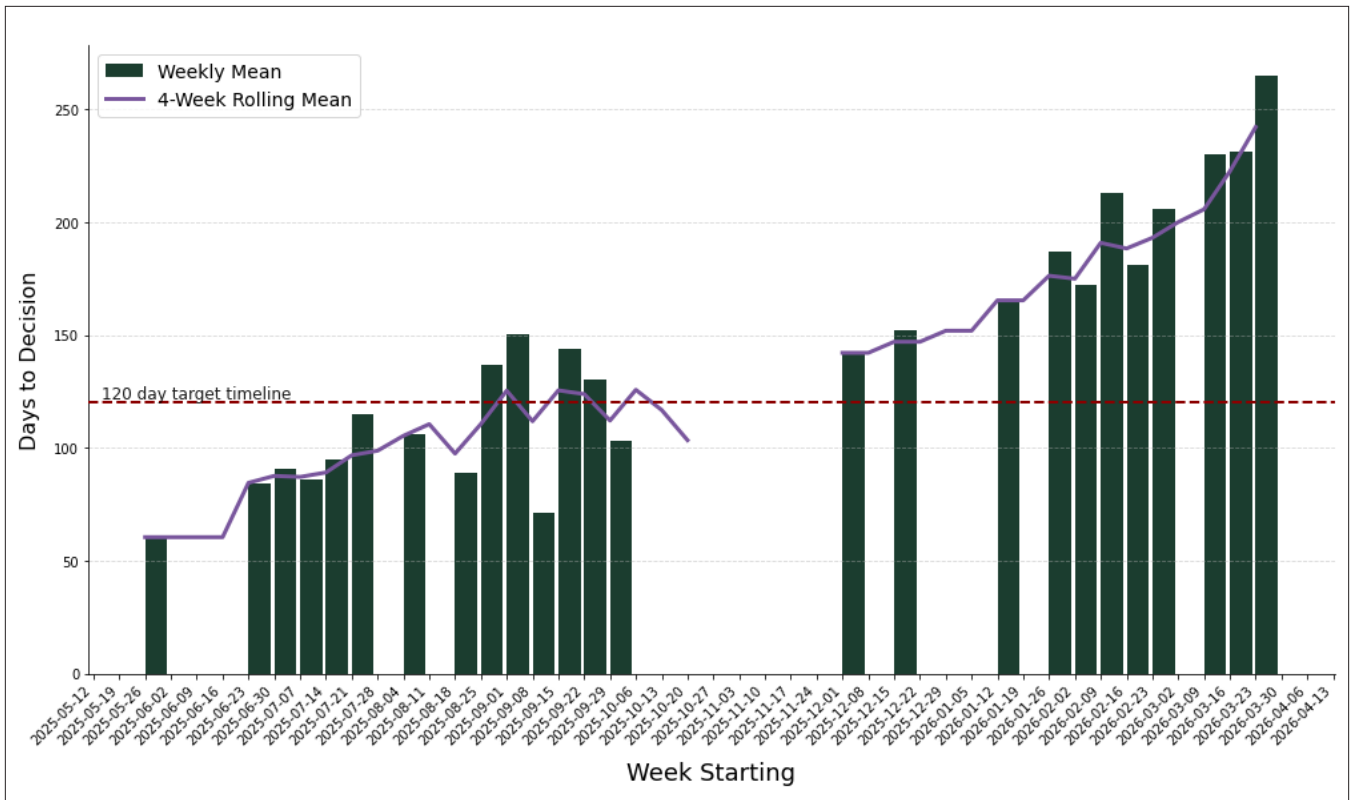


Figure 9. Weekly average decision times for mineral claim application decisions in British Columbia from March 25, 2025 to March 24, 2026.

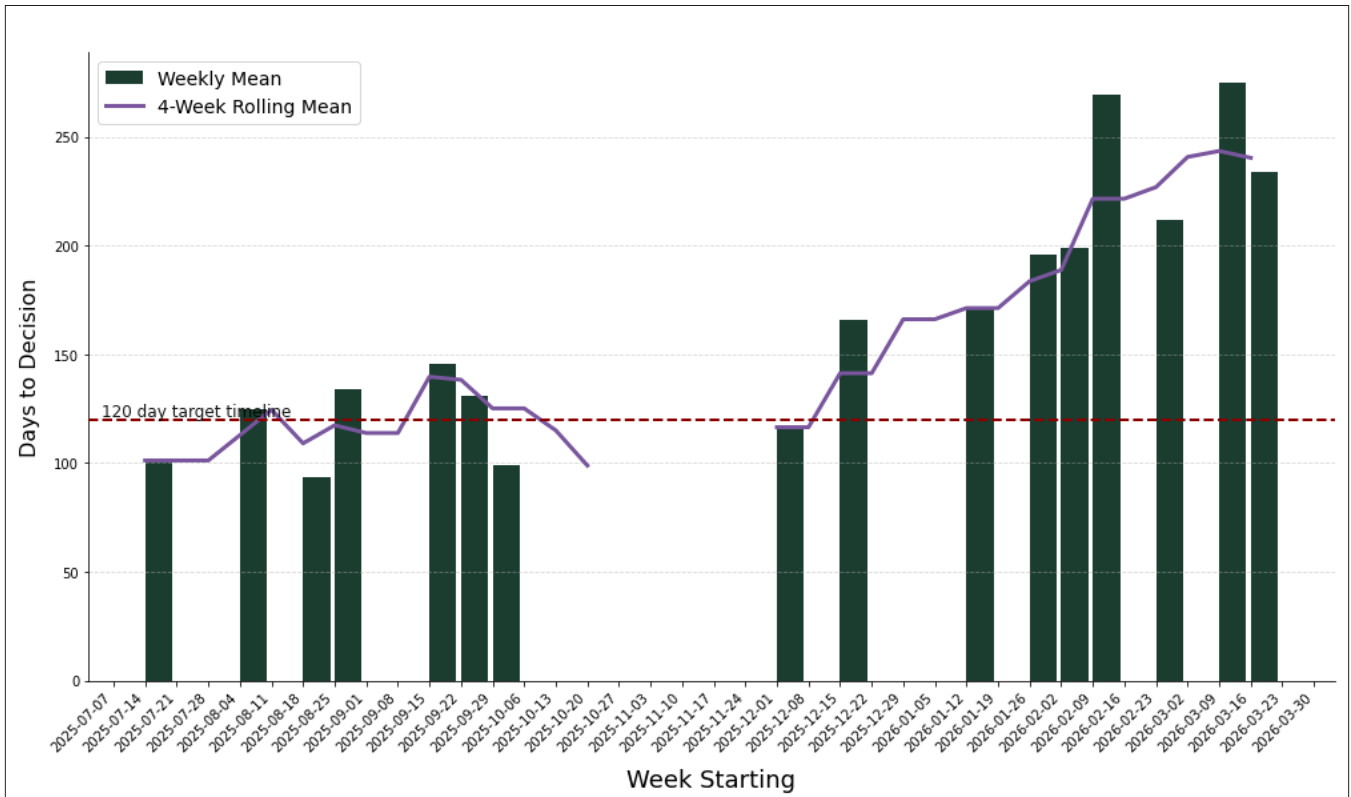


Figure 10. Weekly average decision times for placer claim application decisions in British Columbia from March 25, 2025 to March 24, 2026.

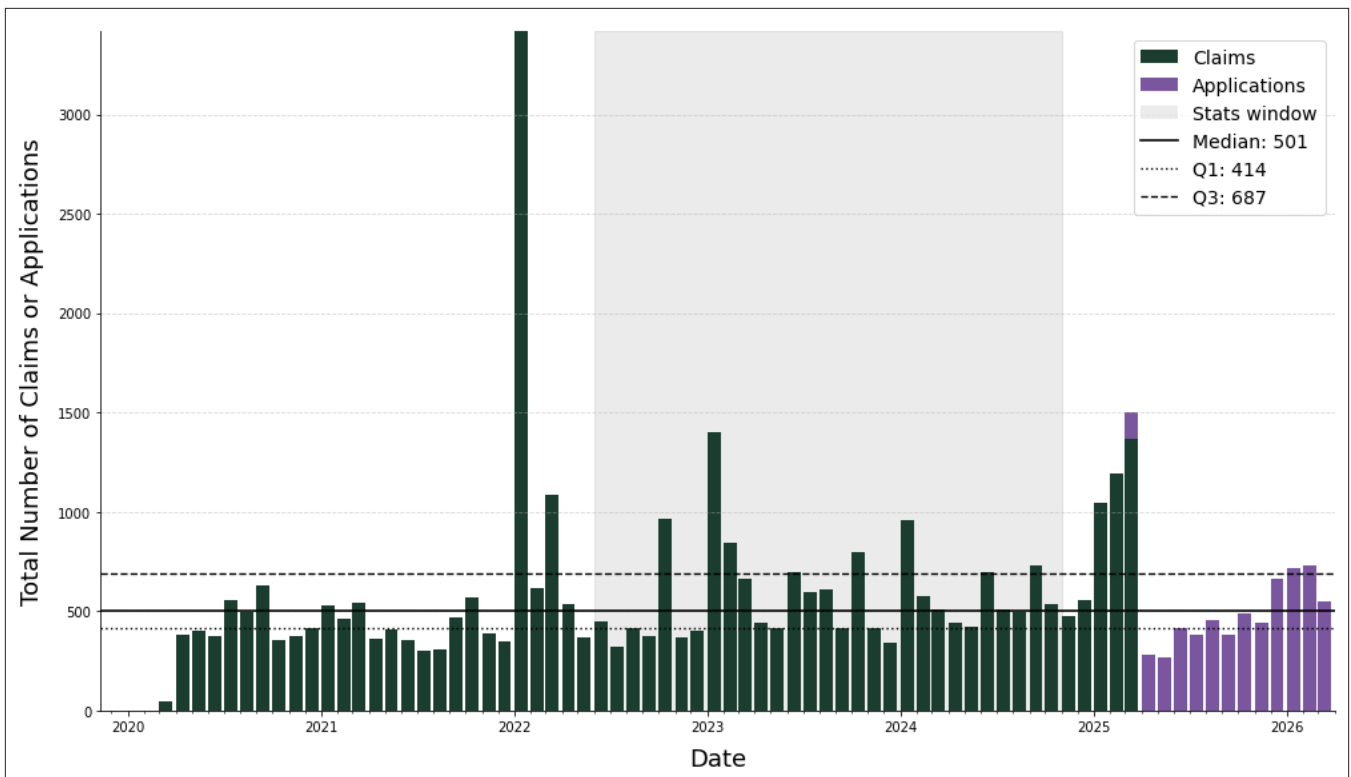


Figure 11. Number of mineral and placer claims/applications staked per month in British Columbia from March 29, 2020 to March 24, 2026, showing median and quartiles.

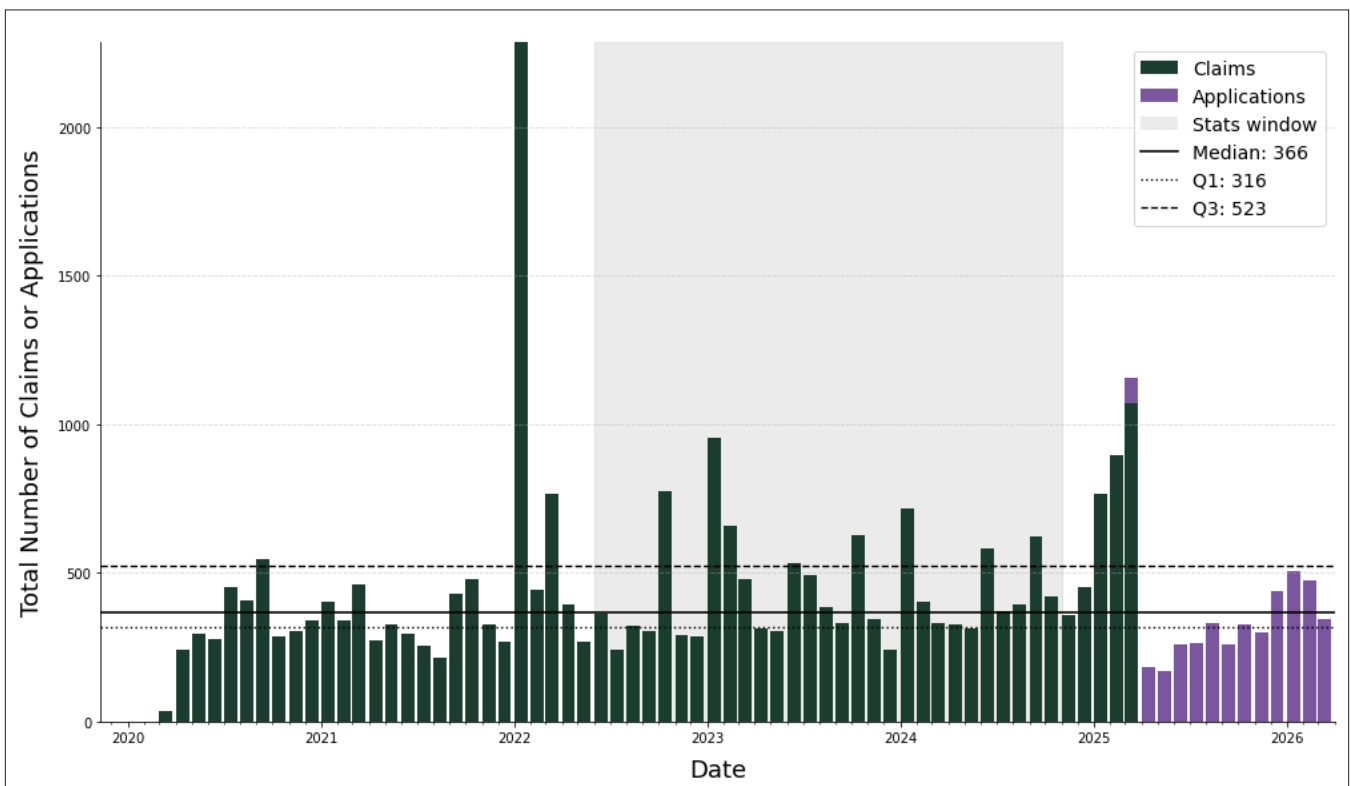


Figure 12. Number of mineral claims/applications staked per month in British Columbia from March 29, 2020 to March 24, 2026, showing median and quartiles.

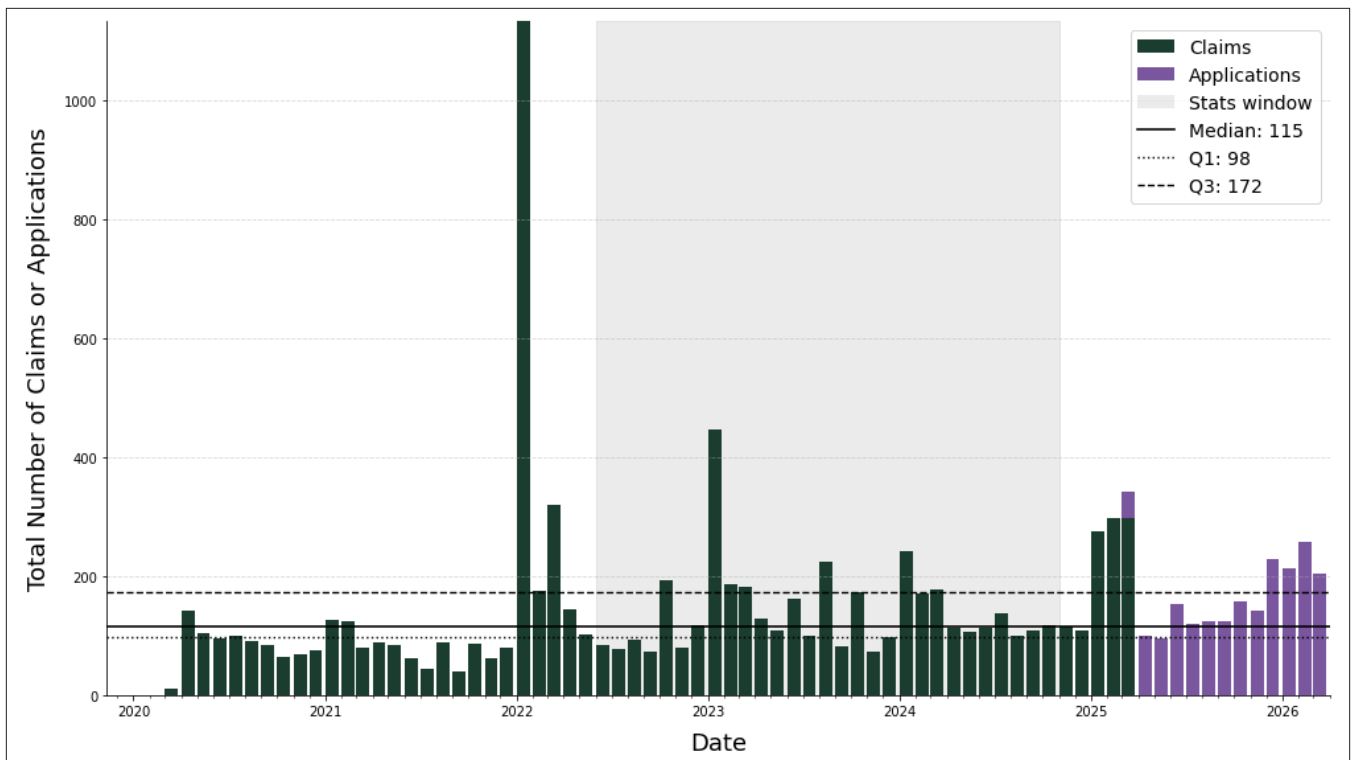


Figure 13. Number of placer claims/applications staked per month in British Columbia from March 29, 2020 to March 24, 2026, showing median and quartiles.

The number of mineral and placer applications submitted has steadily increased since the MCCF was implemented. Although mineral claims were slower to rebound, both have routinely been above the baseline median since December 2025.

Both mineral and placer claims experienced a major staking rush in the leadup to the MCCF: The number of claims increased for three consecutive months. January, February, and March 2025 were all in the third quartile of total claim staking; this is the only instance during the study period in which claims were in the third quartile for three consecutive months. This staking rush also differed from previous examples because it consisted of a steady increase in staking for three consecutive months followed by a sharp decrease. Most other staking rushes, such as in January 2023, begin with a sharp increase and slowly taper off.

Area of Claims Staked

Generally speaking, the size of claims staked follows a similar pattern to the number of claims staked, with more pronounced seasonal variations. Users tend to take smaller claims during the winter and larger claims during the summer (Figures 14–16).

The size of mineral and placer claims following the implementation of the MCCF followed distinctly separate patterns. Placer claims saw a sharp increase in size, possibly related to the price of gold, and then remained relatively steady (Figure 15). Mineral claims, by contrast, fell to the bottom of the first quartile and remained depressed (Figure 16). Only a single month (February 2026) has exceeded the first quartile of average claim size since March 2025.

Change from Baseline

Overall, both the number and size of claim applications since the MCCF was implemented are lower than the pre-MCCF baseline (Table 3). The overall reduction is driven entirely by a reduction in mineral claim applications, while the number and size of placer applications has increased.

The mean number of claims approved per week has decreased by 79.0% relative to the baseline. In early 2026, the rate increased slightly. From January 1 to March 24, 2026, the rate was only 72.9% below the baseline. However, the rate of new applications has increased at a much greater rate than application processing. During the period

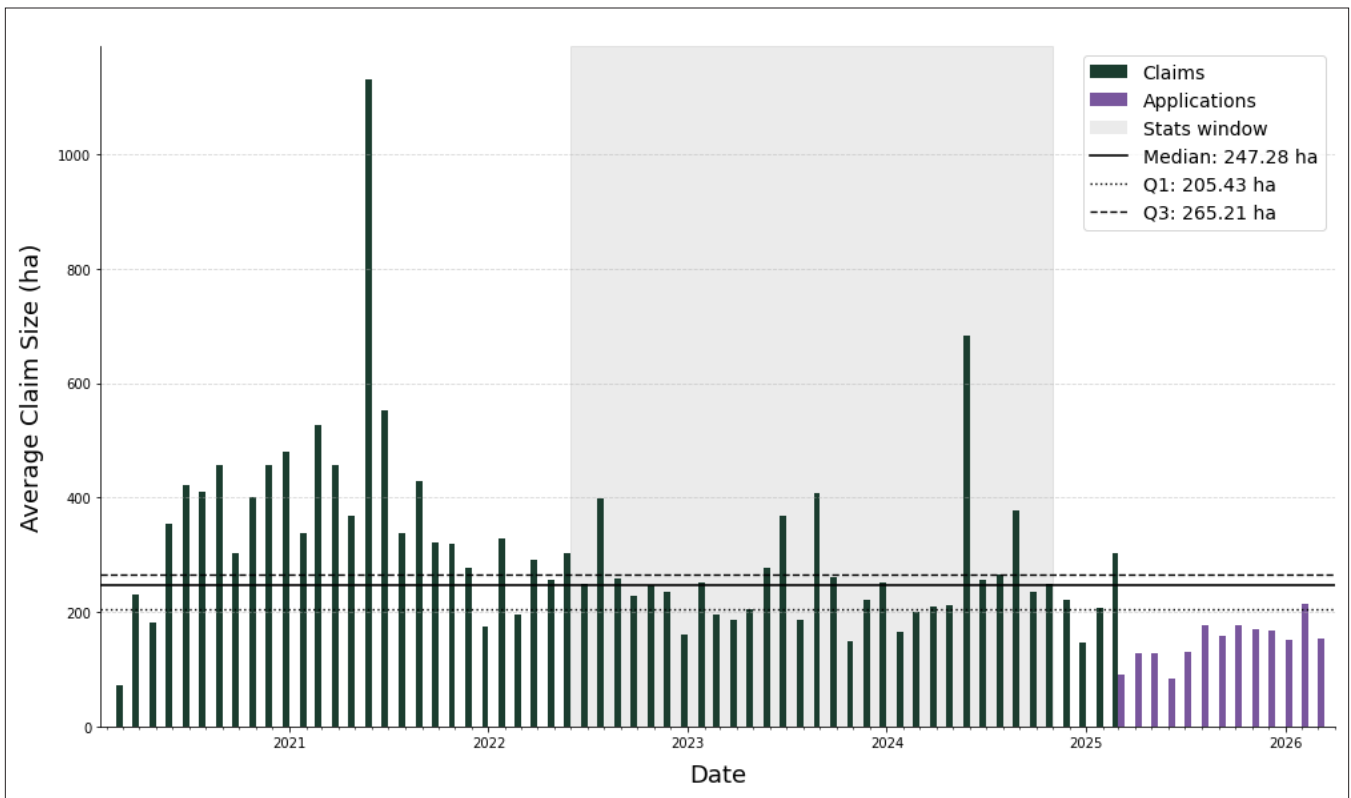


Figure 14. Monthly average area of mineral and placer claims/applications staked in British Columbia from March 29, 2020 to March 24, 2026, showing median and quartiles.

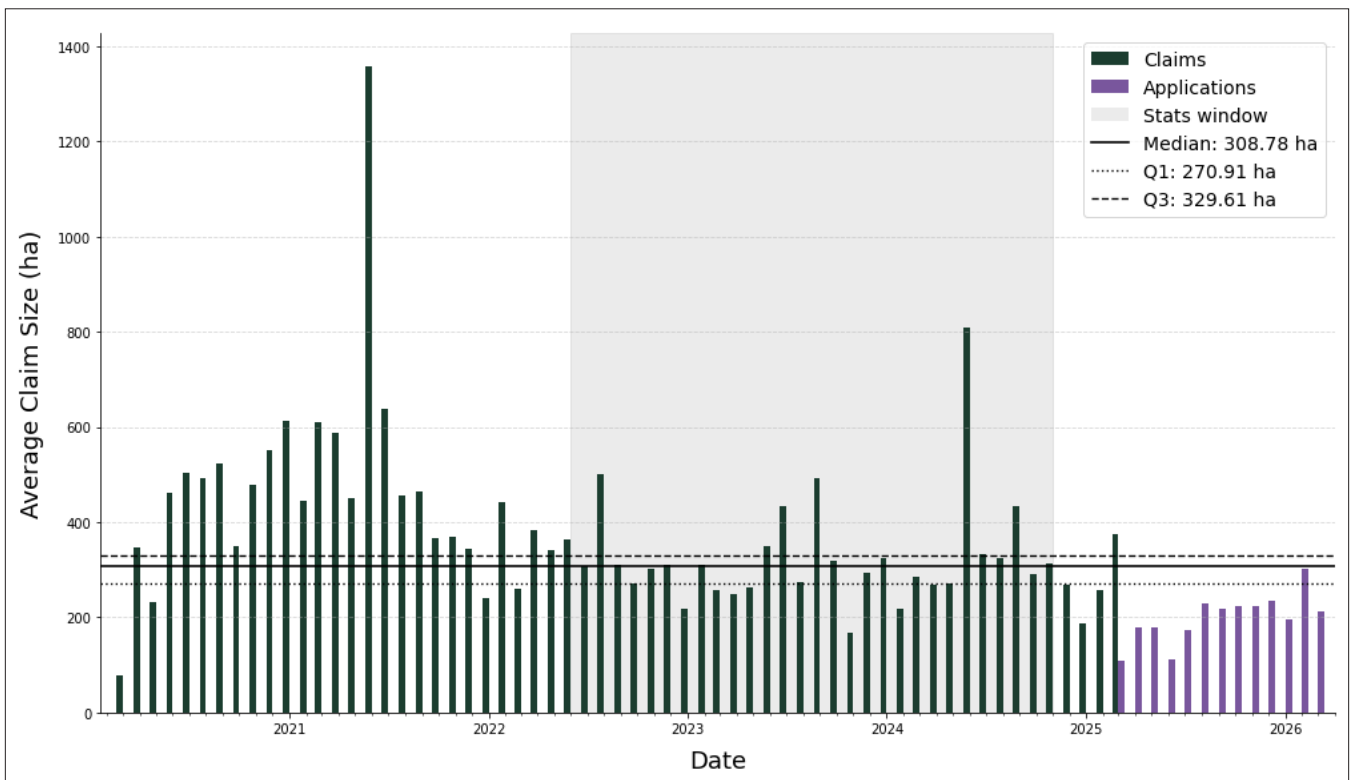


Figure 15. Monthly average area of mineral claims/applications staked in British Columbia from March 29, 2020 to March 24, 2026, showing median and quartiles.

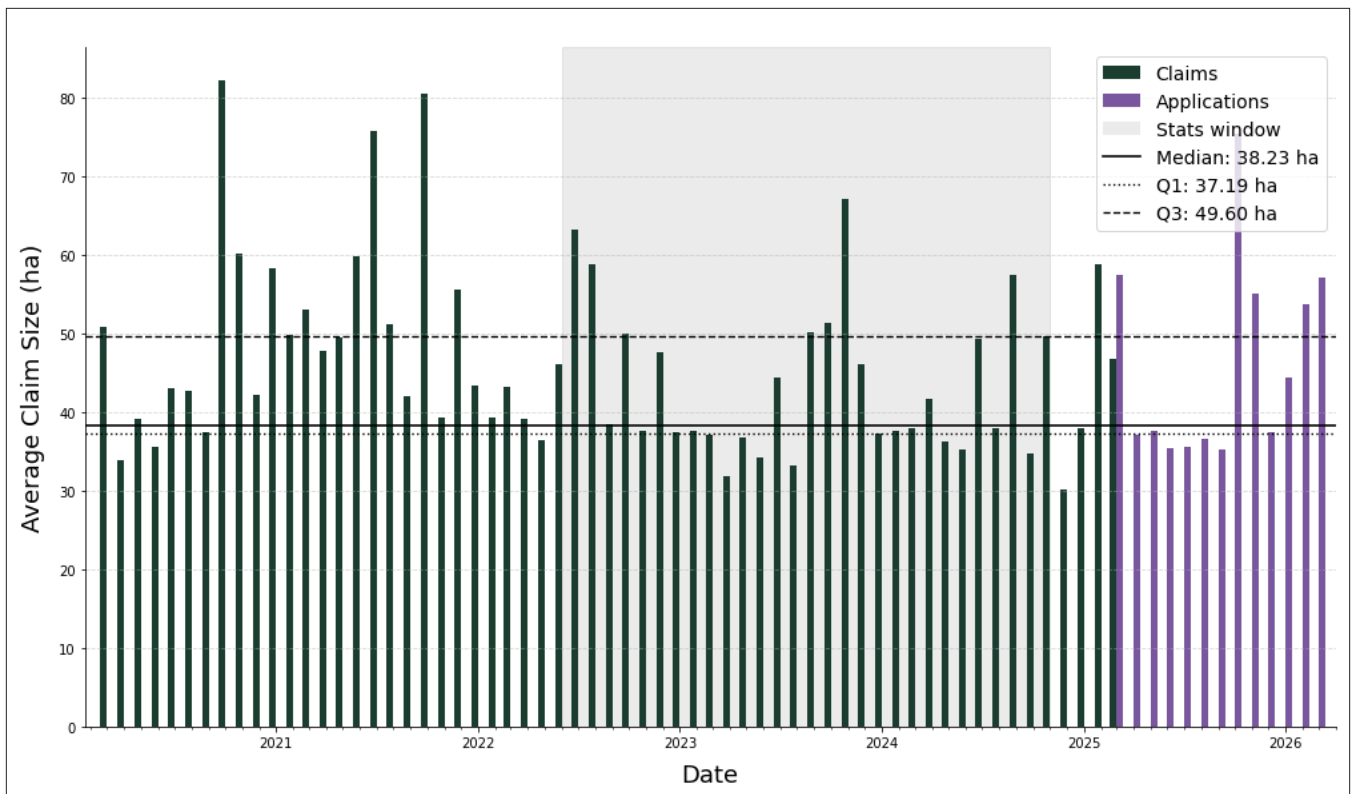


Figure 16. Monthly average area of placer claims/applications staked in British Columbia from March 29, 2020 to March 24, 2026, showing median and quartiles.

Table 3. Change in the size and area of submitted and approved mineral and placer claims/applications since the Mineral Claims Consultation Framework relative to the baseline period from June 1, 2022 to November 30, 2024.

	June 1, 2022 to November 20, 2024 (Baseline)	March 25, 2025 to March 24, 2026 (Post-MCCF)	Change from Baseline (%)
Median Number of Weekly Claims/Applications (All)	106.5	102.5	-3.8
Median Number of Weekly Claims/Applications (Mineral)	82	69.5	-15.2
Median Number of Weekly Claims/Applications (Placer)	24.50	33.00	+34.7
Median Weekly Area of Claims/Applications (All)	25,126.05 ha	14,366.72 ha	-42.8
Median Weekly Area of Claims/Applications (Mineral)	23,651.49 ha	12,494.00 ha	-47.2
Median Weekly Area of Claims/Applications (Placer)	1,014.07 ha	1,285.12 ha	+26.7
Mean Weekly Number of Approved Claims (All)	131.76	27.73	-79.0
Mean Weekly Number of Approved Claims (Mineral)	99.77	18.81	-81.1
Mean Weekly Number of Approved Claims (Placer)	31.99	8.92	-72.1

of January 1 to March 24, 2026, the mean number of weekly claim applications was 20.5% above the baseline, compared to the full period from March 25, 2025 to March 24, 2026, when it was 15.6% below the baseline.

Correlation with Gold Price

In 2025 and 2026, the price of gold reached record highs, exceeding US\$5,000/oz in January 2026. The relationship between monthly claim staking rates and average monthly gold price (Figure 17) was evaluated using Pearson and Spearman correlation tests. Prior to implementation of the MCCF, the number of mineral and placer claims staked was not well correlated with gold price ($r = -0.35$, $p\text{-value} = 0.002$; $\rho = -0.13$, $p\text{-value} = 0.258$), with mineral and placer showing similar results individually.

The MCCF implementation in March 2025 coincided with the beginning of a major gold price ‘bull run’. Since then, the correlation between the price of gold and the number of claims staked increased substantially ($r = 0.93$, $p < 0.001$; $\rho = 0.67$, $p < 0.001$), while both the number and size of claims staked decreased substantially and rapidly (Figure 17).

This shift is consistent with a systemic change in staking behaviour coincident with the implementation of the MCCF, with staking activity becoming more closely coupled to commodity price signals. Fewer and smaller claims, combined with a strong correlation to gold price, suggest a transition toward more price-responsive and potentially shorter-term staking activity relative to the pre-MCCF baseline.

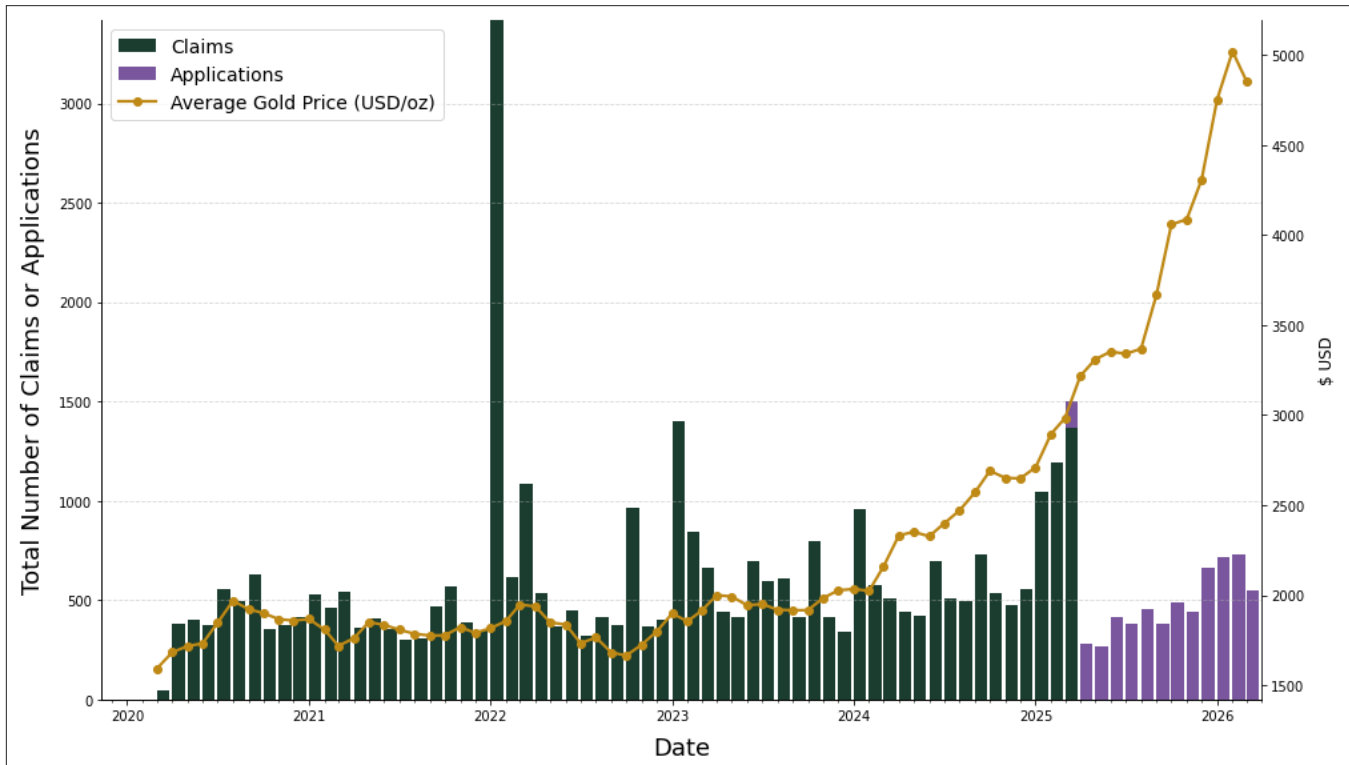


Figure 17. Relationship between the number of mineral and placer claims/applications staked in British Columbia during the period from March 29, 2020 to March 24, 2026 and the average price of gold.

Distribution of Claims by MTO User

A longstanding concern in the mineral exploration community is so-called ‘nuisance stakers’, or people who stake a large number of very small claims in hopes of reselling them and without any serious intention to conduct exploration. The exact definition of nuisance staking is highly subjective and thus beyond the scope of this report; however, the distribution of claim-staking activity has not changed meaningfully since the implementation of the MCCF. There is no indication of a change in the proportion of claims staked by nuisance stakers.

Because the baseline period is more than twice as long as the post-MCCF period, a direct comparison to that period would bias the post-MCCF results toward fewer claims per user. To mitigate this issue the comparison used a representative period from March 25, 2023 to March 24, 2024 instead of the full baseline period. During that period, the top 1% (15) of MTO users staked 21.92% (1,507) claims, the top 50% (717) users staked 88.84% (6,107) of claims, and 46.41% (665) users only staked a single claim.

Since the MCCF implementation, 1,275 unique users have staked claim applications. The top 1% (13) MTO users submitted 20.75% (1,323) of all claim applications (Figure 18), and the top 50% (638) users staked 88.19% (5,197) of claims. The proportion of users who staked only a single claim is 45.33%. The median number of claims staked per user was 2 across all periods examined.

These results show that the proportion of claims staked by specific segments of users has not changed meaningfully since the implementation of the MCCF; however, the overall number and size of claims has decreased. The number of unique users also fell from 1,442 in 2023–2024 to 1,275 in 2025–2026. Figure 19 shows the number of claims and applications per user compared to the average size of that user’s claims in the 2023–2024 and 2025–2026 periods. Although some individual users have increased the number of small claims they stake, the distribution of claims by user segment has not changed substantially. Overall, most users are staking fewer, smaller claims compared to 2023–2024.

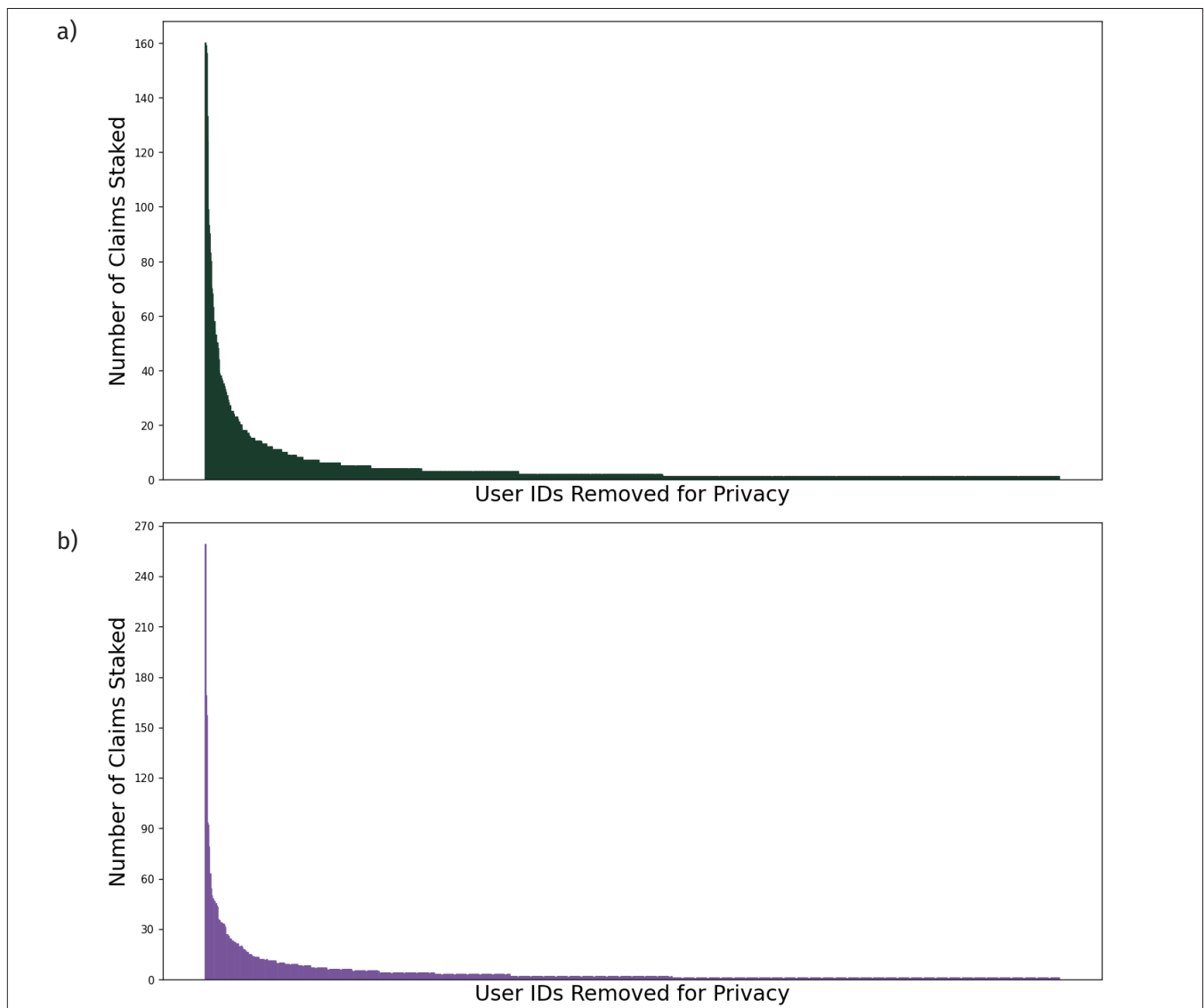


Figure 18: Distribution of staking activity in British Columbia by unique Mineral Titles Online users during the periods from a) March 25, 2023, to March 24, 2024 and b) March 25, 2025, to March 24, 2026.

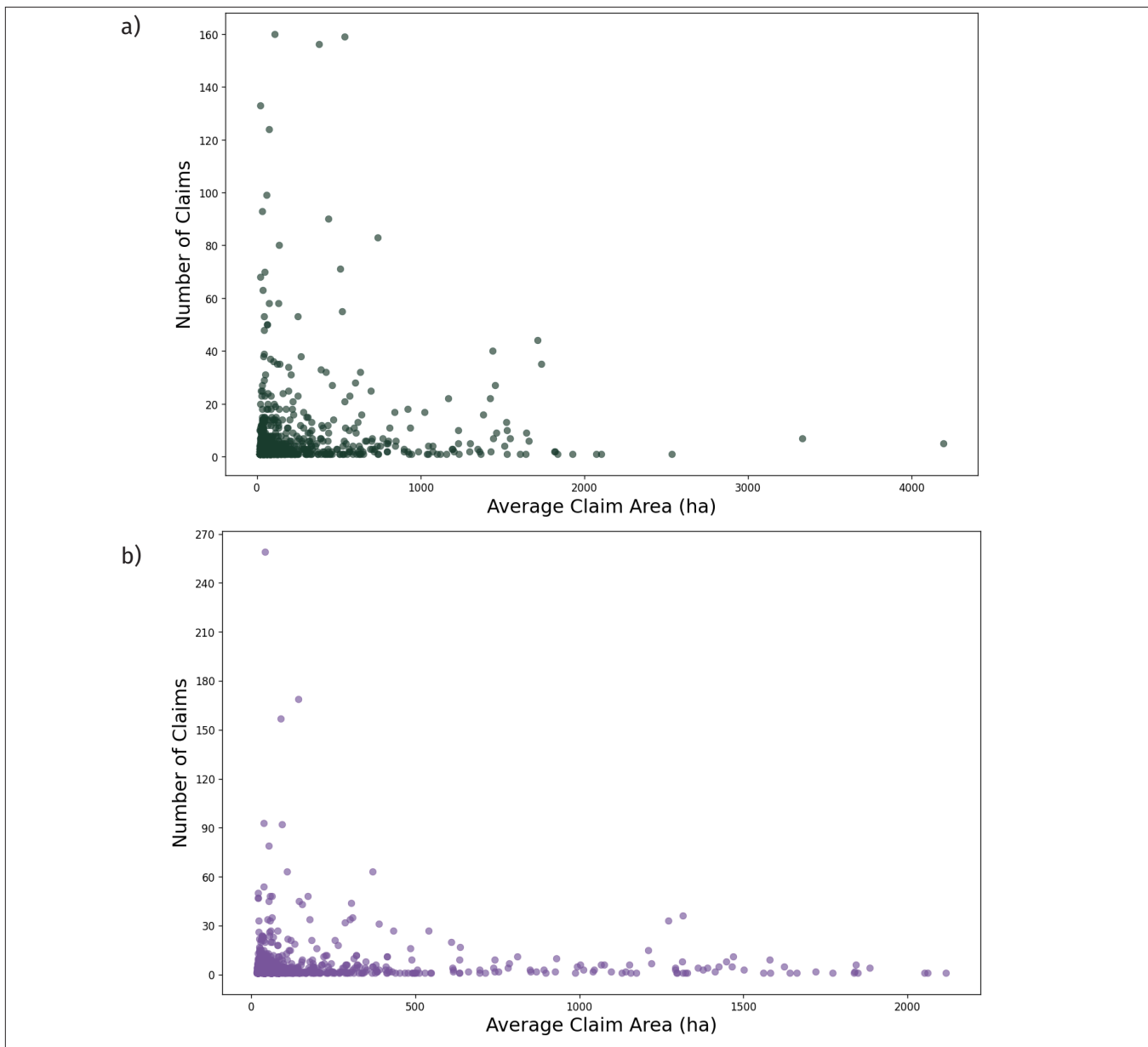


Figure 19: British Columbia Mineral Titles Online users plotted by the number of claims staked and average area of those claims for the periods from a) March 25, 2023, to March 24, 2024, and b) March 25, 2025, to March 24, 2026.

Discussion

Impact of the MCCF on Staking Activity

The months preceding the implementation of the MCCF saw an unprecedented staking rush (Figure 11). Claims staked per month were in the third quartile for three consecutive months in January, February, and March 2025, which is the only instance of this in the dataset. This staking rush was followed by four months in which claim staking was within the first quartile, and six months in which it was below the median. Since December 2025, the number of claims staked per month has rebounded and is routinely in or near the third quartile.

The pre-MCCF staking rush also followed an opposite pattern to most staking rushes. Usually, staking rushes start with a sharp increase and slowly taper off. In contrast, the pre-MCCF staking rush featured a steady increase over three months followed by a sharp decrease on March 25 and 26, 2025. At the same time, the price of gold continued to increase during the sharp decline in staking. This trend suggests that anxiety surrounding the MCCF, not general market conditions, was the reason for the staking rush.

The MCCF has severely impacted mineral claim staking. Placer claims have increased in both quantity and size relative to the baseline (Table 3) and the number of placer claims staked has been above the median most months since the MCCF was implemented (Figure 13). In contrast, the number of mineral applications submitted remained in the first quartile for four months and below the median for eight months during the same period. The area of mineral claims staked has also not rebounded. The average area staked per week overall is 47.2% smaller than the pre-MCCF baseline, and only one month (February 2026) since the implementation of the MCCF has been above the first quartile.

Taken together with the increase in correlation between the price of gold and claim staking, these trends indicate that the MCCF has fundamentally changed the way people stake claims in BC. Although the number of claims staked has rebounded, there may be less appetite for large, serious projects than for small-scale speculation tied to commodity cycles

Spatial Distribution

The locations of mineral and placer applications and approved claims since the MCCF generally coincide with the known mining and exploration districts of BC. Figure 20 shows the location of approved mineral and placer claims.

The distribution of approval timelines is relatively homogenous across the Province. Figures 21 and 22 show the locations of pending applications younger than 120 days and older than 120 days, respectively. No specific regions are subject to uniquely long or short timelines.

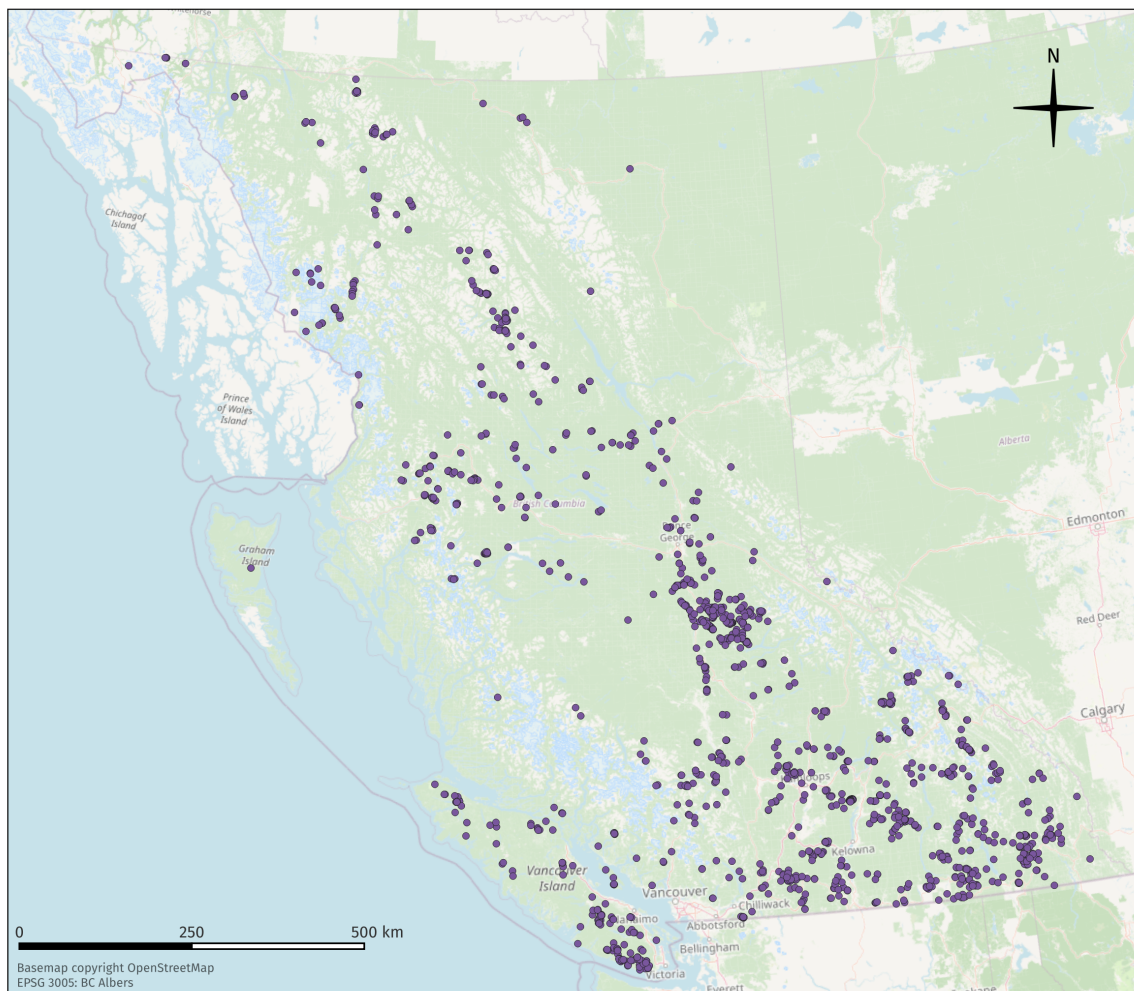


Figure 20: Locations of approved mineral and placer claims in British Columbia from March 25, 2025 to March 24, 2026.

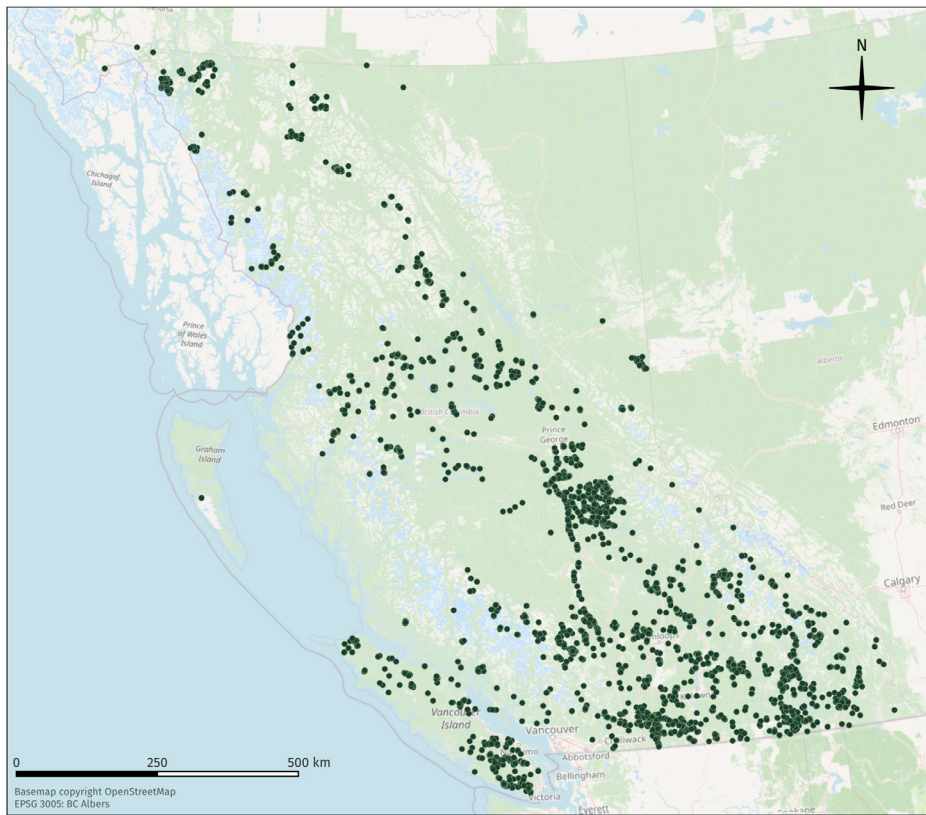


Figure 21: Locations of pending Mineral and Placer applications in British Columbia that are younger than 120 days as of March 24, 2026.

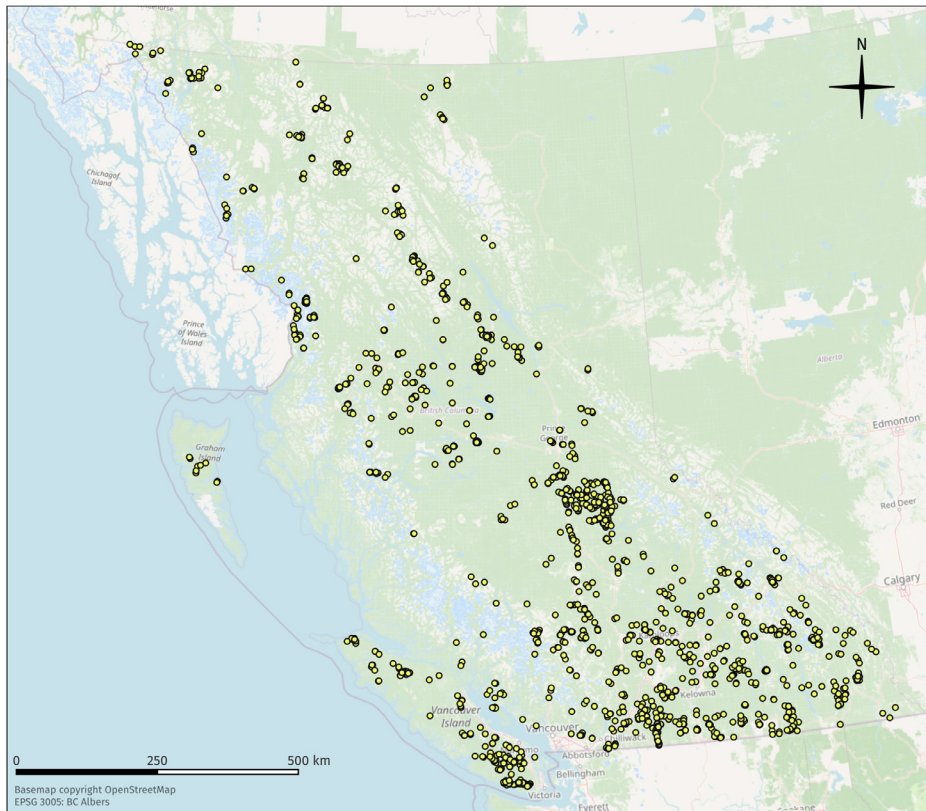


Figure 22: Locations of pending Mineral and Placer claim applications in British Columbia that are older than 120 days as of March 24, 2026.

Impact of Delayed Applications on Explorers

The impact of delayed application decisions on early stage explorers is substantial. Overall, there has been a 79% reduction in the mean number of mineral claims issued per week since the implementation of the MCCF compared to the pre-MCCF baseline.

Mineral claims are critical to early-stage exploration. Only a handful of exploration projects will advance past the early stage (Stevens, 2010), and such a large reduction in the number of new claims will eventually reduce the number of advanced exploration projects and potential mines, thus impacting the entire mining project pipeline. As well as the overall reduction, unpredictable timelines can cause explorers to miss weather windows, financing opportunities, and other deadlines, delaying projects by a full year or longer. In effect, the delay of claim approvals by the MCCF had resulted in a ‘lost year’ of discoveries in BC.

Another concern for explorers is the lack of protection granted by claim applications. For high-value, low-volume commodities such as nuggety placer gold or gemstones, an individual person can extract a significant value of material by hand relatively quickly. Prior to the MCCF staking a claim revealed the location of a discovery, but also provided immediate legal protection from “claim jumpers” stealing material. Since the implementation of the MCCF, staking a claim application still publicly reveals the location, but does not provide legal protection until it is approved. With approval timelines sometimes exceeding a year, this creates a long window when people other than the applicant can easily locate the site and legally remove material, potentially reducing the value of the claim once it is approved.

Another concern for explorers is the lack of protection granted by claim applications. For high-value, low-volume commodities such as nuggety placer gold or gemstones, an individual person can extract a significant value of material by hand relatively quickly. Prior to the MCCF, staking a claim revealed the location of a discovery, but also provided immediate legal protection from theft by ‘claim jumpers.’ Under the MCCF, staking a claim application still publicly reveals the location, but does not provide legal protection until the application is approved. With approval timelines sometimes exceeding a year, this creates a long window during which people other than the applicant can easily locate the site and legally remove material.

Beyond the operational consequences, delayed claim applications also incur direct costs to explorers. Because application fees are collected at the time an application is submitted, explorers can end up with capital locked behind claim applications. The total area of pending mineral applications is 655,610.19 ha and 72,163.87 ha for placer applications. At an application cost of \$1.75/ha and \$5.00/ha, respectively, this corresponds to \$1,508,137 in capital directly sequestered by pending claim applications, excluding tax.

Estimated Economic Impact

Using the 2024 and 2025 EY Surveys (EY Canada, 2025, EY Canada, 2026), grassroots mineral exploration accounted for 35% of the \$552M spent in 2024 on general mineral exploration. In 2025, grassroots exploration accounted for 27% of \$751M total spend. In 2024, the province saw ~7000 new mineral claims, providing an estimate of $\$552\text{M} \times 35\% \div \sim 7000 = \sim \$27,500$ per new claim. Adjusted for 2025 exploration spending, the same number of claims would have corresponded to $\$771\text{M} \times 27\% \div \sim 7000 = \sim \$29,500$ per new claim in 2025. This metric is a proxy. It does not account for the reality that existing claims also attract significant exploration, but it does provide a simple way of estimating the economic activity associated with new claims over the same time period.

Accounting for the ~42% drop in claim size, the current backlog of ~3000 claims corresponds to $3000 \times \$29,500 \times (100 - 42)\% =$

\$51.3M of economic activity is held back by the current MCCF approval backlog.

Turning to claims that were ‘lost’ by MCCF, weekly claims granted averaged 131.76 pre-MCCF and dropped to 27.73, or annualized to 6850 and 1442 respectively. $(6850 - 1442) \times \$29,500 =$

~\$160M of economic activity lost per year due to MCCF implementation.

It is important to emphasize that the figure \$27,500 per new claim is a proxy, and should be framed with significant uncertainty in both directions. The historic rise in the price of gold is not accounted for here, indicating a

potentially higher opportunity cost. Given the 79% decrease in the number of new claims actually issued since the MCCF was implemented, it is likely that the distribution of exploration spend in 2025 heavily favoured existing claims; therefore, the actual impact may be greater than estimated.

Impact on Government

The impact on government must also be considered. With smaller claims being staked, the application fees collected are decreasing, and the subsequent fees for assessment work or cash-in-lieu would also decrease. Some AME members have already reported having to cancel or delay exploration programs due to delayed claim applications (J. Middleton, personal communication, 2025) The trend towards smaller claims (and thus smaller projects) also affects the amount of fees collected from exploration permits.

Given the importance of mineral exploration to many communities in British Columbia, the shortage of mineral exploration work caused by less claims staked could directly affect the province income tax revenue, and the stability of the spending in local economies that rely on mineral exploration.

In the long term, with less early exploration projects being added to the mining pipeline, there will be fewer operating mines in 15–25 years, thus significantly impacting the mining sector, which contributes billions annually in GDP, wages and government revenue (Mining Association of BC, 2025). The BC critical minerals strategy is also at risk without this upstream influx of new potential projects.

In addition, the Fraser Institute’s annual survey on Investment Attractiveness Index showed British Columbia to drop from 13th place in 2024 to 20th place in 2025, despite policy factors and mineral potential factors remaining relatively stable (Fraser Institute, 2024, 2025). Given that the 2025 survey reflects survey results from August to November 2024, the industry uncertainty about incoming policy changes drastically affected the sentiment around the mineral exploration industry in British Columbia. Time will tell how this sentiment changes.

Conclusions and Recommendations

The MCCF has had a profoundly negative impact on claim staking in British Columbia and is not meeting its stated targets. The median number and area of applications submitted per week has decreased substantially compared to the pre-MCCF baseline. This change is driven entirely by a reduction in mineral claims, in spite of strong placer claim performance. The most drastic change is the number of new claims issued. Overall, the mean number of claims issued per week has decreased by 79% since the MCCF was implemented. Although this number has improved slightly since the beginning of 2026, the rate of decisions is still outpaced by the rate of new claim applications. This difference has created a large and growing backlog of claim applications that threatens to further increase delays. The median time for claims to be approved (excluding administrative decisions) is currently 149 days and trending upward in line with the backlog. Currently, only 14.8% of claim applications receive a decision within the stated 120-day target timeline.

Above-average staking activity in recent months and record grassroots exploration spend in 2025 indicates that demand for mineral claims in BC is still strong; however, if explorers cannot obtain the claims they need, the global mineral exploration industry will look elsewhere. Unless immediate action is taken to improve the performance of the MCCF, the status quo will have a severe negative impact on BC’s mineral exploration sector. AME has proposed practical solutions to improve the MCCF, including

- quick deployment of the \$2M allocated for the MCCF to hire, train, and have staff actioning files immediately;
- escalation of claim applications to a more senior level, or emergency process after reaching certain timing gates;
- recognition that “approval delayed is approval declined” – the global mineral exploration industry will pursue other opportunities if approvals for BC claim applications cannot be obtained promptly within the 120-day timeline;
- given the long delay in decisions, allowing work done on claim applications during processing to count toward the value of work on that claim, or block of claims to help companies bridge the gap caused by the seasonality of exploration;

- allowing for companies to apply for a claim and voluntarily pause the process to allow for them to engage with Nations themselves resulting in protecting “first in line status” and allowing for voluntary early engagement;
- introduction of more transparent statuses in the MCCF, such as indicating the time applications spent with each party;
- improvements in the transparency of public application data by adding details such as application stage, and the application date for approved claims to public geospatial datasets and publishing more detailed historical data that includes start and end dates for tenures, and the ‘demised-to’ tenure ID for changed tenures;
- opportunity for claims that have been approved but are dropped to not be subject to further consultation as they have already been reviewed;
- protection of applicant names until claims are approved; and
- capacity funding for First Nations to allow for timely processing of claims.

AME recommends that these items be immediately adopted to mitigate issues caused by the current long timelines and low approval rates of the MCCF.

Disclaimers and Disclosures

Purple Rock Inc. is a consulting firm specializing in geoscience information management. Its clients include or have included the Province of BC, First Nations organizations, industry associations, public geoscience bodies, and mineral exploration and mining companies. Our role in preparing this report was to provide objective, data-driven analysis. Our expertise lies in geoscience data analysis, not in legal matters. Purple Rock Inc. is a regulated firm with Engineers and Geoscientists BC (permit to practice #1002030). Purple Rock Inc. is a corporate member of the Association for Mineral Exploration; this report was funded and commissioned by AME. Purple Rock Inc acknowledges the ancestral and unceded territories of Indigenous Nations throughout Canada, including those of the Coast Salish, x^wməθk^wəyəm (Musqueam), Skwxwú7mesh (Squamish), səliłwətał (Tsleil-Waututh) and Ktunaxa Peoples on whose territory we work.

Purple Rock Inc. and its directors hold no mineral titles or other claims in BC. Lindsay Richards, an employee of Purple Rock Inc., holds some mineral claims in BC in his personal capacity, including claims or claim applications whose status may be affected by MCCF.

All data used in preparing this report was publicly released data obtained at various times from the Government of BC or other public sources.

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