

October 16, 2025

Honourable Randene Neill, Minister of Water, Land and Resource Stewardship
PO Box 9012 STN PROV GOVT
Victoria BC V8W9L6 Canada

Sent via email: WLRS.minister@gov.bc.ca

Dear Minister Neill,

Re: Interest Statement on the Northwest Land Use Planning Process

AME is writing to state our interest in the four Northwest Land Use Planning processes and state our concern about the impact of restricting access to land for exploration.

As Premier Eby laid out on May 26, 2025, the Northwest part of BC is a region of opportunity. If land use planning is done properly it will unlock investment and prosperity while supporting conservation goals. The amount of effort required to get this right is significant. As such, AME has spent the summer engaging mineral tenure holders and working on recommendations for how to ensure mineral exploration in the region is not only successful, but a competitive advantage. AME has participated in all government-led surveys, town halls, and sessions related to this initiative and will come to the table this fall with information and solutions as the process is developed.

PROPOSED 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.”

NO STAKING RESERVES “SENSITIVE AREAS”

For the purposes of this engagement, we refer to the smaller areas within each land use plan that currently have no-staking reserves, or Environmental Land Use Act (ELUA) orders as “sensitive areas.” Some of these sensitive areas appear to match with the nations own asserted Indigenous Protected Conservation Areas (IPCA) other sensitive area boundaries were not made public until the process began. Important to note, each of the sensitive areas contain significant mineral potential. Importantly to our membership, Notice of Work permits are still meant to be possible to obtain and use throughout this period. We hope to see this clearly demonstrated until the conclusion of the land use planning process, even in areas where there is disagreement about land use. Failure for government to ensure this administrative fairness represents moving goal posts.

KASKA DENE LAND USE PLAN

The Kaska Dene Land Use Plan encompasses the largest are of landmass of the proposed areas. While some misinformation has [been reported](#) that there “are very few mineral tenure holders in the IPCA area,” the area in fact holds the largest number of claims of all of the sensitive areas in the plan at 364. Additionally, the total work cost for the area is \$13,526,531.97. There is significant exploration work being done on minerals as diverse as tin, zinc, and even rare earth metals. Mineral potential maps show clear mineral potential in most of the area and demonstrate that it is in fact an important region for exploration. We urge you to carve these out.

TAHLTAN LAND USE PLAN

The Tahltan sensitive area contains the largest total spend of the areas at \$17,452,615.28 with 113 claims. This region contains many active exploration projects that if expropriated would send a negative message. Additionally, the Hat region of the territory contains both active exploration projects on mineral tenures and high mineral potential. We would like to warn you about the significance of what shutting down this region for exploration would mean for our industry. Along with gold, projects in this region contain proven reserves of critical minerals like copper, scandium, cobalt. Lastly, the current map also overlaps Telegraph Creek Road and the Golden Bear Road. Both are important for exploration and mining activity in the greater region.

MEZIADIN LAND USE PLAN

The Meziadin shows some mineral potential and 24 claims in its Eastern region. Total work in the area amounts to \$3,053,053.62 to date. A significant concern for this region is the fact that Highway 37 and 37A run connect here at “Meziadin Junction.” Not only is this the main access point to the North, but also to the Port of Stewart and to many important projects in the region. Conservation measures cannot impact the existing, or future development of these roads, infrastructure, or access.

TAKU RIVER LAND USE PLAN

The sensitive areas in Taku River Tlingit overlap significant mineral potential but contain only one mineral tenure. Other projects sit just outside the planning area or are surrounded by it. It’s our recommendation that roads, airstrips and transmission lines are enabled in these areas.

MEMBER VOICES

Through one-on-one engagement and a series of town hall meetings AME collected comments from our membership about various aspects of the process.

CARVING OUT TENURE/RELINQUISHMENT OF CLAIMS

- “We are going to request that we are carved out because we do not have a lot of faith in fair compensation.”
- “[The Meziadin] is an area that makes a lot of sense [for protection / relinquishing claims]”.

CLARITY

- “Investors want clarity. [They want] some certainty that if they invest outside of sensitive areas that they will have cooperation from First Nations.”

TIMELINESS OF COMPENSATION:

- “The compensation can be very slow to come out; and finding a fair price for projects will take a significant amount of time.”

ROAD ACCESS:

- “We need to make sure there are no restrictions about [Highway 37].”
- “Very remote and there’s not much access. There needs to be an access corridor, but I don’t know what that would look like.”

COLLABORATION:

- “We have learned that when we create shared visions with communities, we get better outcomes. The exploration industry is extremely important, or we won’t have a feedstock of projects. We believe it’s important to focus on areas that have viability to turn into mines.”
- “It will take goodwill from industry. A cooperative approach will work out well for mineral exploration in this region.”

PERMITTING:

- “We were told LUP was an issue in a permit application. We do not know what is in the land use plan”

30X30 CLASSIFICATIONS

We understand that your government has a working definition of the 30x30 initiative as protecting biodiversity and having a boundary. We also understand that you plan to include the Northwest Land Use Plan in your 30x30 count. By our measure, 54 per cent of the province has been conserved in some fashion. Further measures will add to the 54 per cent, further restricting access to the land for exploration. We have made efforts to work with your ministry on this and hope to ensure that existing conservation measures are counted before new measures that restrict mineral exploration, and the resource economy are pursued.

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 while working on the Northwest Land Use Planning Process. It has been noticed that since its launch, government has begun numerous land use planning processes with Tsilhqot'in Nation, Squamish Nation, and 'Namgis First Nation. It's clear that asserted IPCAs are being put into land use planning process, and it is unclear how the public interest, including mineral potential and mineral claims are being considered in these processes. While we remain optimistic about the Northwest, the WLRs ministry has actively misled our organization and must do more to ensure the public interest is being taken seriously when conducting these and future land use planning.

We urge you and your government to focus on getting the Northwest strategy right before commencing other land use plans and work related to IPCAs in our province.

MINERAL EXPLORATION

Mineral exploration is an industry that supports people across our province. Every mine in BC was discovered by a prospector or junior company. In BC the median mineral exploration project employs 38 people and studies have shown that for every dollar spent on an exploration project 97% stays in the province.

Unfortunately, despite the opportunity, our industry has seen a cooling over the past three years. Recent data shows a 14 per cent mineral exploration expenditure decline from \$643 million in 2023 to \$552 million in 2024 in. Metres drilled, which is a valuable metric of mineral exploration activity on the ground, dropped from 747,579 meters to 631,726 metres. Without early-stage exploration, our British Columbia will struggle to develop the critical mineral mines we need.

Land use planning plays a big role in our members access to land and ability to raise money and develop projects. Please think carefully about the work you are doing and how it may impact future generations in our province.

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

Sincerely,



Todd G. Stone
President & CEO
Association for Mineral Exploration

Cc: Jagrup Brar, Minister of Mining and Critical Minerals
Ravi Kahlon, Minister of Jobs, Economic Development and Innovation
Lori Halls, Deputy Minister of Water, Land and Resource Stewardship
Nathaniel Amann Blake, Deputy Minister of Mining and Critical Minerals
Fazil Mihar, Deputy Minister of Jobs, Economic Development and Innovation
David Muter, Assistant Deputy Minister
Tania Demchuk, Assistant Deputy Minister of Mining and Critical Minerals