

July 27, 2018

Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource Operations and Rural Development
Government of British Columbia

Via email: FLNR.Minister@gov.bc.ca; and WildlifeAndHabitat@gov.bc.ca

Dear Minister Donaldson,

Re: AME Submission re Improving Wildlife Management and Habitat Conservation

The Association for Mineral Exploration (AME) is encouraged by the government's commitment to create an overall strategy regarding improving wildlife management and habitat conservation. We are submitting our initial thoughts as you embark on engagement with Indigenous groups and multiple stakeholders.

AME is the lead association for the mineral exploration and development industry based in British Columbia. Established in 1912, AME represents, advocates and promotes the interests of almost 5,000 members who are engaged in mineral exploration and development in BC and globally. AME encourages a safe, economically strong and environmentally responsible industry by providing clear initiatives, policies, events and tools to support its membership in delivering responsible projects that advance reconciliation and provide benefit to all British Columbians.

Mineral explorers require access to much of the province's land base to explore for minerals. Many of the exploration activities of our members have very little, if any, land disturbance. Activities range from no impact activities such as aerial surveys and mapping, to temporary, minor disturbances such as geochemical sampling and conducting geophysical surveys. When a potential deposit is identified, activities may increase and involve activities such as the cutting of timber in small areas to facilitate drilling and larger sampling programs. Although it is generally estimated that only 1 in 10,000 grassroots exploration projects results in a mine, the activity leading to discovery can build local capacity, and in 2017, companies spent \$246 million in communities throughout BC on mineral exploration.

Although our members' physical impact on the landscape is typically low, we find ourselves challenged by a fast-paced and continual rollout of policy that is beginning to affect the ability to access and explore on the land. We urge the government to take a gradual, sequential approach that protects ecosystems while allowing for low-disturbance mineral exploration activities.

Our specific recommendations are as follows:

Build a strategy that considers existing legislation as well as changes proposed both federally and provincially.

- BC has committed to developing new legislation including a revised *Environmental Assessment Act* while the federal *Impact Assessment Act* is being drafted. Furthermore, BC has committed to developing species-at-risk legislation. The development of a wildlife strategy needs to be considered in sequence with new legislation. Cumulative impacts of compounding legislation or policy need to be analyzed and the impacts understood before implemented.

Design and implement a provincial reconciliation framework.

- AME supports advancing reconciliation as well as the principles within the *United Nations Declaration on the Rights of Indigenous Peoples*. We urge that the UNDRIP principles are applied consistently and thus recommend a provincial framework before any new legislation, regulation or policy is created.

Lay out provincial principles followed by regional strategies.

- BC is vast, and we caution the province in taking a “one-size-fits-all” approach that does not reflect the biological, social, cultural and economic diversity of the province’s regions and the local communities’ values. Provincial principles that can lay the groundwork for regional strategies should be prioritized.

Start with pre-existing priorities and engage on others in a sequential fashion.

- BC has committed to working with the federal government in implementing the *Species at Risk Act* in regard to protecting southern mountain caribou. Implement caribou recovery strategies to meet SARA requirements, and plan for engaging on other wildlife management and habitat conservation strategies.
- Ensure that all initiatives are costed and timed. Note that mineral exploration in itself does not create revenue, and additional costs could lead to investment in mineral exploration elsewhere.

Build transparency.

- Invest in the best available, evidence-based scientific research, knowledge and spatial data and make this data publicly available and searchable.
- Continue to integrate government data and permitting so that permits can be applied for with the best available information, and that publicly available information on stakeholders, road closures and habitat management is readily available online.

Thank you for meaningfully considering this submission; we look forward to working collaboratively with you toward a wildlife management and habitat conservation strategy that supports healthy ecosystems as well as our industry.

Regards,



Edie Thome
President & CEO
Association for Mineral Exploration