

August 29, 2018

Honourable George Heyman
Minister of Environment and Climate Change Strategy
Government of British Columbia

Via email: ENV.Minister@gov.bc.ca; and species.at.risk.BC@gov.bc.ca

Dear Minister Heyman:

Re: AME Submission re Species at Risk Legislation

The Association for Mineral Exploration (AME), on behalf of our members, appreciates the opportunity to comment on proposed species at risk legislation at this early stage in the process. We support the principles of sustainable development and are pleased that the primer on protecting species at risk acknowledges the importance of conserving British Columbia's species in a framework that supports vibrant communities, livelihoods and economic values through the sustainable management of BC's natural resources.

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 exploration is the essential first phase of the mining life cycle. New mineral discoveries are needed to replace mines whose resources have been depleted. This includes those minerals that are critical to the shift toward a greener economy. Mineral resources are hidden, and the location of the next major discovery is impossible to predict. What is certain is that many more significant mineral deposits exist in BC. In order to search for these deposits, mineral explorers require access to much of the province's land base to conduct temporary, low impact and localized exploration activities. These activities build local capacity and support livelihoods. In 2017, companies spent \$246 million in communities throughout BC on mineral exploration.

We believe that a carefully considered approach to managing species at risk can be compatible with a vibrant mineral exploration and development sector.

Our recommendations at this early stage are as follows:

Ensure clear regulation that is consistent over mineral exploration timeframes.

- Exploration programs can have a long life of 15+ years from discovery to complete deposit evaluation.
- Mineral explorers and the investment community that funds exploration require a consistent and predictable legislative and regulatory approach to land use that allows for continued exploration when discoveries are made.

Recognize the need for a large land base for low-impact early-stage exploration and the small footprint of advanced-stage exploration.

- Early-stage exploration projects have little or no impact on the physical environment. However, access to a large land-base is needed for early-stage exploration as it is estimated that only one in 10,000 of these projects ever becomes a mine.
- Advanced-stage exploration projects commonly involve more land disturbance such as timber-cutting for drilling, but the project footprint remains small.
- All projects with mechanized disturbance must have a reclamation plan and post a reclamation bond with the province before they are allowed to proceed; this system ensures that disturbed land is reclaimed once programs are complete.

Consolidate the approach to managing species at risk and habitats. Avoid overlap and duplication with other legislation, policies and existing land-use designations.

- Multiple provincial statutes, legal measures and land-use designations are used to regulate human-related activities that may impact species at risk and habitats. These include the Forest Practices and Range Act and the Wildlife Act. The addition of species at risk legislation may lead to overlap and duplication of requirements for mineral explorers without any additional benefit to species at risk. We encourage a single consolidated approach to managing species and habitats that is underlain by provincial principles and that leads to long-term consistency and predictability.
- Federal legislation and acts, such as the Species at Risk Act, the Fisheries Act and the new Impact Assessment Act also relate to managing species at risk. New provincial legislation needs to be analyzed and the cumulative impacts of compounding legislation needs to be understood to avoid unnecessary and costly duplication.

Ensure the sustainability of BC's communities by balancing economic and social needs with environmental management.

- Develop new legislation that balances environmental protection with the socioeconomic needs of healthy communities and the industries that support those communities. Look for creative and collaborative approaches including incentives for compliance, offsetting measures and partnerships.

Thank you for engaging our industry, and for considering our submission. We look forward to continuing to contribute to this discussion on conserving BC's species at risk in a framework that supports communities, livelihoods and economic values.

Regards,



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Vice President, Regulatory and Technical Policy
Association for Mineral Exploration