

September 6, 2018

VIA EMAIL: [ENV.Minister@gov.bc.ca](mailto:ENV.Minister@gov.bc.ca)

The Honourable George Heyman  
Minister of Environment and Climate Change Strategy  
Room 112 Parliament Buildings  
Victoria, BC V8V 1X4

Minister Heyman:

**Re: Mining Association of British Columbia Comments on Species at Risk Initiative**

The Mining Association of BC (MABC) is the voice of mining in BC, representing operating steelmaking coal, metal and industrial mineral producers, as well as smelting operations and advanced development companies in the province. Our mandate is to encourage the safe, responsible development and operation of mining and related facilities across BC. As Canada's largest producer of copper and steelmaking coal, BC is an essential component of Canada's commitment to a lower carbon future.

MABC's members include some of this province's most iconic operating companies who directly employ thousands of British Columbians and indirectly support thousands of supplier and support jobs in every region of the province. In 2017, the mining industry contributed \$11.7 billion to British Columbia's economy and \$859 million in payments to government. Mining is the largest private sector employer of Indigenous people in Canada, and a major partner to Indigenous businesses. Indigenous peoples also share in the benefits of mining through innovative Impact Benefit Agreements that our member companies enter into directly with Indigenous nations. Many First Nations in British Columbia also share directly in mineral tax revenue from mines operating within their traditional territories, a policy that is both unique to mining operations in BC, and unique amongst Canadian jurisdictions. Widely recognized for these industry-leading practices, the mining sector in BC remains committed to advancing reconciliation with Indigenous peoples.

MABC acknowledges the Ministry of Environment's (MOE) strategic and integrated approach to developing effective and practical Species At Risk (SAR) legislation and is encouraged by MOE's consideration of the optimal sequencing and timing of introducing this legislation in relation to other initiatives and legislative proceedings that are underway. We firmly believe that this is crucial to the durability and clarity of the SAR legislation, as well as its subsequent regulatory framework. This strategic approach also serves to temper the destabilizing impacts to BC's competitiveness of the multiple regulatory change initiatives that are currently underway, both provincially and federally.

MABC supports considerations of appropriate governance models for the development and implementation of the SAR legislation, particularly given the breadth of intersects that the proposed legislation will have across both provincial and federal Acts. Acknowledging the complex regulatory burden facing the diverse range of users of BC's land base will further support the development of practical and fair SAR legislation.

MABC understands that MOE continues its engagement with other jurisdictions in Canada and beyond that have introduced legislation with similar objectives. These learnings are important to developing a customized approach that addresses BC's unique and vast biodiversity, and which is grounded in the experience of other jurisdictions. Allowing the time needed for these collective efforts to realize their value should be given full consideration.



MABC understands that MOE is working toward releasing its Intentions Paper for public comment in early 2019, with the view to introducing legislation in Fall 2019. MABC believes that this strategic adjustment in timing is highly beneficial to the development of sound legislation.

MABC remains committed to supporting the Ministry of Environment in the development of BC's SAR legislation. We were pleased to actively participate in the multi-stakeholder sessions hosted by the Province in April and June, and we look forward to reviewing the What We Heard Report arising from these sessions later this month.

MABC also understands that MOE envisions bringing Indigenous groups and other stakeholders together over the Fall to provide input on specific policy issues, and we look forward to participating constructively in these upcoming engagements. Additionally, we would be pleased to host opportunities for direct engagement between MOE and the mining sector in advance of the Intentions Paper being finalized. These focused workshops would be intended to supplement MOE's engagement with Indigenous groups and other stakeholders.

We appreciate this opportunity to acknowledge the work of your Ministry's staff in developing responsible and practical legislation to achieve our shared goals. MABC remains supportive of clear, integrated and more predictable processes, improving the attractiveness of British Columbia as a destination for mining investment, advancing reconciliation with Indigenous peoples, protecting the province's ecological health, and reinforcing the economic wellbeing of British Columbians.

We look forward to our continued engagement with you and the Ministry's staff on the development of BC's Species at Risk legislation.

Sincerely,



Bryan Cox  
President and CEO

cc: Mark Zacharias, Deputy Minister, Environment and Climate Change Strategy  
Dave Nikolejsin, Deputy Minister, Energy, Mines and Petroleum Resources  
Jennifer McGuire, Assistant Deputy Minister, Environment and Climate Change Strategy  
Peter Robb, Assistant Deputy Minister, Energy, Mines and Petroleum Resources  
Alec Dale, Executive Director, Ecosystems Branch, Environment and Climate Change Strategy

