

From: [Morrison, Ken ENV:EX](#)
To: [Jonker, Jennifer B ENV:EX](#); [Dale, Alec R ENV:EX](#)
Cc: [Welsh, Leah ENV:EX](#); [Andrews, Sarah ENV:EX](#)
Subject: RE: RUSH: ESSP input for a BN request - A brief tour of an exploration site w/Assoc. Mineral Exploration
Date: Friday, September 29, 2017 10:37:28 AM

Its with me in eApprovals. I will flip a copy to Alec.

From: Jonker, Jennifer B ENV:EX
Sent: Friday, September 29, 2017 10:37 AM
To: Dale, Alec R ENV:EX
Cc: Welsh, Leah ENV:EX; Andrews, Sarah ENV:EX; Morrison, Ken ENV:EX
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Cliff Number: 311290

Other Number:

TRIM Number:

Topic: A brief tour of an exploration site w/Assoc. Mineral Exploration

Date Final Due: 9/29/2017 12:00:00 AM

Last Action: Item Not Approved

Comments:

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Jennifer Jonker

Division Issues Manager

Environmental Protection | Environmental Sustainability and Strategic Policy

Ministry of Environment and Climate Change Strategy

☎ 250-387- 6002 | ✉ Jennifer.jonker@gov.bc.ca

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To: [Jonker, Jennifer B ENV:EX](#); [Dale, Alec R ENV:EX](#)
Cc: [Welsh, Leah ENV:EX](#); [Morrison, Ken ENV:EX](#)
Subject: RE: RUSH: ESSP input for a BN request - A brief tour of an exploration site w/Assoc. Mineral Exploration
Date: Friday, September 29, 2017 10:37:38 AM
Attachments: [2017-09-29 AME BN.docx](#)
[311290 - Congratulations on Appointment as Minister of Environment and Climate Change Strategy .msg](#)

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**MINISTRY OF ENVIRONMENT
INFORMATION NOTE**

September 29, 2017

File:

CLIFF/tracking #:311290

PREPARED FOR: Honourable George Heyman, Minister of Environment & Climate Change Strategy

DATE AND TIME OF MEETING: October 3, 2017

ATTENDEES: Edie Thome - Association for Mineral Exploration (AME)

ISSUE: Request from the AME to meet with the Minister and to tour a mineral exploration site – see AME letter - July 24, 2017.

BACKGROUND:

- The AME is the lead association for mineral exploration and development in British Columbia. Established in 1912, AME represents, advocates, protects and promotes the interests of thousands of members who are engaged in mineral exploration and development in BC.
- More than 6,000 British Columbians are employed in the mineral exploration industry.
- AME met with Minister Mungall (Ministry of Energy Mines and Petroleum Recourses) the week of September 18, 2017.

DISCUSSION:

- The Ministry of Energy, Mines and Petroleum Resources is the lead regulatory agency for exploration activities in B.C.
- Under the Environmental Management Act (EMA) waste discharges to the environment associated with the mining operations are required to obtain waste discharge authorizations unless explicitly exempt.
- Exploration sites are not required to obtain EMA permits except where open pit bulk samples are excavated, or where bedrock are being removed for the purposes of underground exploration. This is due to the increased risk of acid rock drainage from exposed mineralised rock.
- Where a discharge occurs (typically storm water effluent or underground drainage) an authorization is required at exploration sites, and permitting is led by Regional Operations Branch (ROB) of the Environmental Protection Division. ROB has formed a mine authorizations team to undertake the delivery of authorization services for the mining industry. This team provides professional advice on mine waste management and protection of environmental quality.

- The Mining team co-ordinates as needed with EMPR during the review and issuance of Notices of Work under the Mines Act to ensure effective, timely review of waste discharge applications.
- The ministry has developed guidance documents for the mining industry to assist in the preparation of EMA applications. The ministry has also developed joint guidance documents with EMPR, works to streamline overlapping jurisdictions, and to clarify guidance to mine proponents, and is working with EMPR and EAO to clarify understanding of the Regulatory Continuum for all ministries.

CONCLUSION or SUMMARY or NEXT STEPS:

- ENV's regulatory involvement is limited to issuance of waste discharge permits associated with advanced exploration where bulk samples are being taken or bedrock is being removed for the purposes of underground development.
- Proponents are encouraged to engage early with ministry staff to understand requirements.
- The Ministry published online a number of guidelines for the mining industry to assist with environmental baseline studies and with application.
- A meeting with **AME** is set for October 3, 2017. If need be, David Morel or Mark Love be available for technical support associated with the regulation of the exploration sector.

Contact:

*David Morel
ADM, EPD
778-698-2332*

Alternate Contact:

*Ed Hoffman
EPD/ROB
250-565-6443*

Prepared by:

*Mark Love
EPD/Mining Operations/ROB
250-847-7416*

Reviewed by	Initials	Date
DM		
DMO		
ADM		
Dir./Mgr.		
Author		

From: Edie Thome
To: [Minister, ENV ENV:EX](#)
Subject: 311290 - Congratulations on Appointment as Minister of Environment and Climate Change Strategy
Date: Monday, July 24, 2017 12:38:24 PM
Attachments: [image003.jpg](#)
[image001.jpg](#)
[AME to Minister George Heyman-Envt Climate Change_July 242017-signed.pdf](#)

Dear Minister Heyman,

On behalf of the Association for Mineral Exploration, I would like to personally congratulate you on your appointment as Minister of Environment and Climate Change Strategy. The Association for Mineral Exploration (AME) represents over 4,500 individuals and companies engaged in the exploration and development of valued mineral resources in BC. Formed in 1912, the association has worked closely with governments to represent the interests of mineral explorers and developers and ensure a responsible, competitive and enduring industry for the benefit of British Columbians.

AME looks forward to establishing a productive and effective working relationship with you. We have been fortunate to maintain excellent dialogue and interaction with numerous employees of your Ministry, something AME values and wishes to continue. The ongoing success of our industry is key to a vibrant rural and provincial green economy, and we look forward to your leadership in ensuring its ongoing success.

Of specific interest to AME will be the ability of mineral explorers to access lands for exploration purposes, under reasonable regulatory oversight that enables the industry to proceed in a timely manner. We also believe that the province is exceptionally positioned to host additional mineral exploration and development, under responsible guidelines that recognize the interests of all citizens, and especially indigenous and local communities. The province is also a national leader in developing strategies in conjunction with national legislation – namely the Species at Risk Act and Canadian Environmental Assessment Act – that embody environmental protection along with the consistency and certainty for business practices that mineral explorers require to conduct their work. We look forward to working with you to understand those key priorities as they relate to our industry and association.

We are hopeful that we can meet with you soon, and frequently thereafter as the BC Government moves forward. To start the conversation, I would like to extend a meeting invitation to you, knowing that you will be very busy in familiarizing yourself with your new role. I am proposing that we host you on a brief tour of an exploration site during the summer before the Legislature reconvenes. The tour will allow us to discuss various aspects of sustainable exploration with other tour participants such as the local exploration group, First Nations leaders and workers, proponents and local elected officials as well as potentially other Ministers and staff.

Because our members work and relationships span the province, we can be very flexible in the location and timing. We can work with whatever time and logistics work for you and your staff. I can be reached at 604.630.3920 or cell 778.952.2345; please also feel free to connect with me by email at ethome@amebc.ca.

Once again, AME wishes to congratulate you on your appointment – we look forward to meeting you in person very soon.

Yours truly,



Edie Thome

President & Chief Executive Officer

Association for Mineral Exploration

cc: Board of Directors, AME

Diane Nicolson, Chair, AME

Regional Exploration Groups



Edie Thome

President and CEO

AME | Association for Mineral Exploration

800-889 W Pender Street, Vancouver, BC V6C 3B2

Dir: 604.630.3920 Cell: 778.952.2345 www.amebc.ca

Visit us on [Facebook](#). Follow us on [Twitter](#).

Join us for AME Roundup 2018

Vancouver Convention Centre East – under the sails of Canada Place

January 22 – 25, 2018

www.amebc.ca/roundup Twitter: #ameRU

July 24, 2017

Hon. George Heyman
Minister of Environment and Climate Change Strategy
PO Box 9047 Stn Prov Govt
Victoria, BC V8W 9E2

Dear Minister Heyman,

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A handwritten signature in black ink, appearing to read 'Edie Thome', with a large, stylized initial 'E'.

Edie Thome
President & Chief Executive Officer
Association for Mineral Exploration

cc: Board of Directors, AME
Diane Nicolson, Chair, AME
Regional Exploration Groups

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To: [Dale, Alec R ENV:EX](#)
Subject: RE: RUSH: ESSP input for a BN request - A brief tour of an exploration site w/Assoc. Mineral Exploration
Date: Friday, September 29, 2017 10:38:37 AM

I asked about getting you a copy, but I was told "version control" ☺ Looks like you have it now.
eApprovals....not sure if I like, pros and cons. 2nd time I've used it.

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Subject: RE: RUSH: ESSP input for a BN request - A brief tour of an exploration site w/Assoc. Mineral Exploration
Date: Friday, September 29, 2017 1:40:11 PM

Great. Thanks all for the quick turnaround!

Enjoy your weekend!

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Sent: Friday, September 29, 2017 1:24 PM
To: Andrews, Sarah ENV:EX; Jonker, Jennifer B ENV:EX
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Subject: RE: RUSH: ESSP input for a BN request - A brief tour of an exploration site w/Assoc. Mineral Exploration
Date: Friday, September 29, 2017 1:52:00 PM

I will try to extract off my watched list. Yes I wrote and approve.

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Alec,

Any chance you can forward to me? Sarah and her out of office (Christina) are offline.

Can I assume that you and Ken both approve?

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Sent: Friday, September 29, 2017 10:28 AM

To: Jonker, Jennifer B ENV:EX

Cc: Welsh, Leah ENV:EX; Andrews, Sarah ENV:EX; Morrison, Ken ENV:EX

Subject: RE: RUSH: ESSP input for a BN request - A brief tour of an exploration site w/Assoc. Mineral Exploration

Ok assuming it is actually us and not FLNR that needs to be engaged.

From: Jonker, Jennifer B ENV:EX

Sent: Friday, September 29, 2017 10:23 AM

To: Dale, Alec R ENV:EX

Cc: Welsh, Leah ENV:EX; Andrews, Sarah ENV:EX; Morrison, Ken ENV:EX

Subject: RUSH: ESSP input for a BN request - A brief tour of an exploration site w/Assoc. Mineral Exploration

Hi Alec –

This is in regards to the email Sarah just sent out –thanks for your help Sarah.

RUSH for today please.

David M has indicated that he would like to have Parks and ESSP weigh in on this BN. I understand there are some land issues (and possible caribou, etc) that he feels should be included in the BN.

I have actioned this via eApprovals and is with Parks. I have asked Sarah Andrews to have her folks connect with you for ESSP input.

Below I have copied and pasted the info from eApprovals as a FYI.

You have been sent an eApprovals Item by Morel, David P ENV:EX.

Cliff Number: 311290

Other Number:

TRIM Number:

Topic: A brief tour of an exploration site w/Assoc. Mineral Exploration

Date Final Due: 9/29/2017 12:00:00 AM

Last Action: Item Not Approved

Comments:

Most important issues in ENV for Association are related to access to land base that they believe is restricted by parks, protected areas and wildlife set aside can we involve other Divisions in putting note together.

Jennifer Jonker

Division Issues Manager

Environmental Protection | Environmental Sustainability and Strategic Policy



Ministry of Environment and Climate Change Strategy
☎ 250-387-6002 | ✉ Jennifer.jonker@gov.bc.ca

From: Dale, Alec R ENV:EX
To: Jonker, Jennifer B ENV:EX
Subject: 2017-09-29 AME BN
Date: Friday, September 29, 2017 2:20:05 PM
Attachments: 2017-09-29 AME BN.docx

My edits still in track changes here, but you can just accept them I think.

AD

**MINISTRY OF ENVIRONMENT
INFORMATION NOTE**

September 29, 2017

File:

CLIFF/tracking #:311290

PREPARED FOR: Honourable George Heyman, Minister of Environment and Climate Change Strategy

DATE AND TIME OF MEETING: October 3, 2017

ATTENDEES:

Edie Thome, President and Chief Executive Officer, Association for Mineral Exploration (AME)

ISSUE: Meeting with Edie Thome to discuss the interests of the AME.

BACKGROUND:

The AME is the lead association for BC's mineral exploration and development industry. Established in 1912, AME represents, advocates, protects and promotes the interests of its more than 4,500 members who are engaged in mineral exploration and development in BC. Edie Thome has been President and CEO since June 2017 coming most recently from BC Hydro.

More than 6,000 British Columbians are employed in the mineral exploration industry. AME met with Minister Mungall, Ministry of Energy Mines and Petroleum Resources (MEMPR) the week of September 18, 2017. A copy of MEMPR's briefing note is attached.

DISCUSSION:

The Ministry of Energy, Mines and Petroleum Resources is the lead regulatory agency for exploration activities in B.C.

(i) Environmental Management Act (EMA) Permitting

Under EMA, waste discharges to the environment associated with the mining operations are required to obtain waste discharge authorizations unless explicitly exempt. Exploration sites are not required to obtain EMA permits except where open pit bulk samples are excavated, or where bedrock are being removed for the purposes of underground exploration. This is due to the increased risk of acid rock drainage from exposed mineralised rock.

Where a discharge occurs (typically storm water effluent or underground drainage) an authorization is required at exploration sites, and permitting is led by Regional Operations Branch (ROB) of the Environmental Protection Division. ROB has formed a mine authorizations team to undertake the delivery of authorization services for the

mining industry. This team provides professional advice on mine waste management and protection of environmental quality. The Mining team co-ordinates as needed with EMPR during the review and issuance of Notices of Work under the *Mines Act* to ensure effective, timely review of waste discharge applications.

The ministry has developed guidance documents for the mining industry to assist in the preparation of EMA applications. The ministry has also developed joint guidance documents with EMPR, works to streamline overlapping jurisdictions, and to clarify guidance to mine proponents, and is working with EMPR and EAO to clarify understanding of the Regulatory Continuum for all ministries.

(ii) Access to Crown Lands for Exploration Purposes

AME has identified the need in past meetings and correspondence for the ability of mineral explorers to access lands for exploration purposes under reasonable regulatory oversight that enables the industry to proceed in a timely manner. To this end, AME has stated that *“almost 18% of BC is closed to mineral exploration and development through parks, protected areas and other designations, and an additional 33% is subject to significant and unreasonable restrictive conditions on mineral exploration and development. The restrictions are unwarranted and are unfair.”*

AME or its members are often consulted during land use planning processes that recommend new parks and protected areas. BC Parks was instructed in 2011 to advise/consult with AME on all new parks and protected areas being advanced for establishment involving Crown lands. The province uses a variety of land designation tools to balance interests, including those of AME’s members, outside of the current parks and protected areas system.

AME and its members have an interest in and have been provided updates on the Province's work on caribou recovery. Regular stakeholder update calls regarding Southern Mountain Caribou were suspended during the extended interregnum period. Those update calls are about to restart and a letter will be sent shortly inviting AME to re-engage on regular update calls.

AME and its members will also have an interest in new endangered species legislation in BC and staff in ENV will include AME in the stakeholder engagement process associated with that new legislation.

SUMMARY:

ENV’s regulatory involvement is limited to issuance of waste discharge permits associated with advanced exploration where bulk samples are being taken or bedrock is being removed for the purposes of underground development. Proponents are encouraged to engage early with ministry staff to understand requirements.

The Ministry published online a number of guidelines for the mining industry to assist with environmental baseline studies and with application.

A meeting with AME is set for October 3, 2017. If need be, David Morel or Mark Love be available for technical support associated with the regulation of the exploration sector.

BC Parks will continue to consult with AME when advancing parks and protected areas proposal on Crown land.

Staff from Environmental Sustainability and Strategic Policy Div. (in conjunction with FLNR) will continue to consult with AME on Southern Mountain Caribou and new endangered species legislation.

Attachments:

Attachment 1: Ministry of Energy, Mines and Petroleum Resources Briefing Note

Contact:

*David Morel
ADM, EPD
778-698-2332*

Alternate Contact:

*Ed Hoffman
EPD/ROB
250-565-6443*

Prepared by:

*Mark Love
EPD/Mining Operations/ROB
250-847-7416*

Reviewed by	Initials	Date
DM		
DMO		
ADM		
Dir./Mgr.		
Author		

From: [Jonker, Jennifer B ENV:EX](#)
To: [Dale, Alec R ENV:EX](#)
Cc: [Morrison, Ken ENV:EX](#); [Welsh, Leah ENV:EX](#); [Jonker, Jennifer B ENV:EX](#)
Subject: Question: 2017-09-29 AME BN
Date: Friday, September 29, 2017 2:35:34 PM
Attachments: [2017-09-29 AME BN.DOCX](#)

To confirm, as I don't have access to the original BN, has Parks added their information in?? I do see some Parks information, but wasn't sure what was added....I only see tracked changes from Alec.

Thanks,
Jennifer.

From: Dale, Alec R ENV:EX
Sent: Friday, September 29, 2017 2:20 PM
To: Jonker, Jennifer B ENV:EX
Subject: 2017-09-29 AME BN

My edits still in track changes here, but you can just accept them I think.

AD

**MINISTRY OF ENVIRONMENT
INFORMATION NOTE**

September 29, 2017

File:

CLIFF/tracking #:311290

PREPARED FOR: Honourable George Heyman, Minister of Environment and Climate Change Strategy

DATE AND TIME OF MEETING: October 3, 2017

ATTENDEES:

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ISSUE: Meeting with Edie Thome to discuss the interests of the AME.

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AME and its members will also have an interest in new endangered species legislation in BC and staff in ENV will include AME in the stakeholder engagement process associated with that new legislation.

SUMMARY:

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A meeting with AME is set for October 3, 2017. If need be, David Morel or Mark Love be available for technical support associated with the regulation of the exploration sector.

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Staff from Environmental Sustainability and Strategic Policy Div. (in conjunction with FLNR) will continue to consult with AME on Southern Mountain Caribou and new endangered species legislation.

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Attachment 1: Ministry of Energy, Mines and Petroleum Resources Briefing Note

Contact:

*David Morel
ADM, EPD
778-698-2332*

Alternate Contact:

*Ed Hoffman
EPD/ROB
250-565-6443*

Prepared by:

*Mark Love
EPD/Mining Operations/ROB
250-847-7416*

Reviewed by	Initials	Date
DM		
DMO		
ADM		
Dir./Mgr.		
Author		

From: Diana Walls
To: [Dale, Alec R ENV:EX](#)
Subject: RE: 311290 - Congratulations on Appointment as Minister of Environment and Climate Change Strategy
Date: Tuesday, October 3, 2017 9:15:14 AM
Attachments: [image002.png](#)

Thank you for your note Alec.

I am glad that 2:00(ish) works for you. And yes, please feel free to call me at the number below at your convenience. I look forward to speaking with you.

Sincerely,

Diana



Diana Walls
Senior Director, Strategic Policy
AME | Association for Mineral Exploration
T: 604.630.3924
C: 778.836.9850

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www.amebc.ca/roundup Twitter: [#ameRU](#)



From: Dale, Alec R ENV:EX [<mailto:Alec.Dale@gov.bc.ca>]

Sent: Tuesday, October 3, 2017 9:02 AM

To: Diana Walls

Subject: RE: 311290 - Congratulations on Appointment as Minister of Environment and Climate Change Strategy

Hi Diana, my apologies for not getting back to you. Yes today at 2:00 does work actually. I have another meeting right before that, so may be a couple minutes late. How about I call you at the number below as soon as I am back in my office (should only be 5-10min late at max)?

From: Diana Walls [<mailto:dwalls@amebc.ca>]

Sent: Tuesday, October 3, 2017 8:28 AM

To: Dale, Alec R ENV:EX

Cc: Edie Thome

Subject: RE: 311290 - Congratulations on Appointment as Minister of Environment and Climate Change Strategy

Good morning Alec, I hope this message finds you well.

I am following up on your request to speak about a briefing of the Minister in advance of his conversation with our President & CEO, Edie Thome; - specifically on the subject of caribou and endangered species/species at risk. I am more than happy to chat. Last Friday I had proposed a time of 2:00pm this afternoon to speak, but I do not believe I heard back from you. Will this time still work for you? If not, we can find definitely another time. I am filling in for our executive while they are away this week; so regrettably, my schedule is not as flexible as it normally is. Thank you for your understanding and I hope to speak with you later this afternoon,

Sincerely,

Diana



Diana Walls
Senior Director, Strategic Policy
AME | Association for Mineral Exploration
T: 604.630.3924
C: 778.836.9850

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From: Diana Walls

Sent: Friday, September 29, 2017 5:06 PM

To: 'Dale, Alec R ENV:EX' <Alec.Dale@gov.bc.ca>

Cc: Edie Thome (ethome@amebc.ca) <ethome@amebc.ca>

Subject: RE: 311290 - Congratulations on Appointment as Minister of Environment and Climate Change Strategy

Good afternoon Alec,

I would be happy to speak with you about the matters of interest to AME, some of which relate to your area of expertise in SARA/Endangered Species legislation.

Can I propose we speak by phone next week? I am available on Tuesday afternoon, if that works for you. Say 2:00pm?

With best wishes,

Diana



Diana Walls

Senior Director, Strategic Policy

AME | Association for Mineral Exploration

T: 604.630.3924

C: 778.836.9850

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www.amebc.ca/roundup Twitter: #ameRU



From: Dale, Alec R ENV:EX [<mailto:Alec.Dale@gov.bc.ca>]

Sent: Friday, September 29, 2017 12:11 PM

To: Diana Walls <dwalls@amebc.ca>

Subject: FW: 311290 - Congratulations on Appointment as Minister of Environment and Climate Change Strategy

Hi Diane, just forwarding this note I sent to Edie and wondering if you might have any input? For clarity my area of responsibility that is likely of highest interest is species at risk.

Thanks

Alec

From: Dale, Alec R ENV:EX

Sent: Friday, September 29, 2017 12:09 PM

To: 'Edie Thome'

Subject: RE: 311290 - Congratulations on Appointment as Minister of Environment and Climate Change Strategy

Hi Edie, I just wanted to check in as we are prepping briefing materials for your upcoming meeting with the Minister. Is there anything in particular you want to discuss with him regarding species at risk in general or specifically on the mandate commitment for SAR legislation and/or caribou? I just want to ensure we are able to prep him and inform you as best possible on areas of interest that overlap my area of responsibility.

Thanks,

Alec

Alec Dale

Executive Director, Ecosystems Branch

B.C. Min. of Environment & Climate Change Strategy

Mailing: PO Box 9338 Stn. Prov. Govt. Victoria, B.C. V8W 9M1

Courier: 4th Floor, 2975 Jutland Rd.

Tel: 778-698-4384

Email: alec.dale@gov.bc.ca

From: Edie Thome [<mailto:ethome@amebc.ca>]

Sent: Monday, July 24, 2017 12:38 PM

To: Minister, ENV ENV:EX

Subject: 311290 - Congratulations on Appointment as Minister of Environment and Climate Change Strategy

Dear Minister Heyman,

On behalf of the Association for Mineral Exploration, I would like to personally congratulate you on your appointment as Minister of Environment and Climate Change Strategy. The Association for Mineral Exploration (AME) represents over 4,500 individuals and companies engaged in the exploration and development of valued mineral resources in BC. Formed in 1912, the association has worked closely with governments to represent the interests of mineral explorers and developers and ensure a responsible, competitive and enduring industry for the benefit of British Columbians. AME looks forward to establishing a productive and effective working relationship with you. We have been fortunate to maintain excellent dialogue and interaction with numerous employees of your Ministry, something AME values and wishes to continue. The ongoing success of our industry is key to a vibrant rural and provincial green economy, and we look forward to your leadership in ensuring its ongoing success.

Of specific interest to AME will be the ability of mineral explorers to access lands for exploration purposes, under reasonable regulatory oversight that enables the industry to proceed in a timely manner. We also believe that the province is exceptionally positioned to host additional mineral exploration and development, under responsible guidelines that recognize the interests of all citizens, and especially indigenous and local communities. The province is also a national leader in developing strategies in conjunction with national legislation – namely the Species at Risk Act and Canadian Environmental Assessment Act – that embody environmental protection along with the consistency and certainty for business practices that mineral explorers require to conduct their work. We look forward to working with you to understand those key priorities as they relate to our industry and association.

We are hopeful that we can meet with you soon, and frequently thereafter as the BC Government moves forward. To start the conversation, I would like to extend a meeting invitation to you, knowing that you will be very busy in familiarizing yourself with your new role. I am proposing that we host you on a brief tour of an exploration site during the summer before the Legislature reconvenes. The tour will allow us to discuss various aspects of sustainable exploration with other tour participants such as the local exploration group, First Nations leaders and workers, proponents and local elected officials as well as potentially other Ministers and staff.

Because our members work and relationships span the province, we can be very flexible in the location and timing.

We can work with whatever time and logistics work for you and your staff.

I can be reached at 604.630.3920 or cell 778.952.2345; please also feel free to connect with me by email at

ethome@amebc.ca.

Once again, AME wishes to congratulate you on your appointment – we look forward to meeting you in person very soon.

Yours truly,



Edie Thome
President & Chief Executive Officer
Association for Mineral Exploration
cc: Board of Directors, AME
Diane Nicolson, Chair, AME
Regional Exploration Groups



Edie Thome
President and CEO
AME | Association for Mineral Exploration
800-889 W Pender Street, Vancouver, BC V6C 3B2
Dir: 604.630.3920 Cell: 778.952.2345 www.amebc.ca
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From: [Jonker, Jennifer B ENV:EX](#)
To: [Dale, Alec R ENV:EX](#)
Subject: FW: QUESTION: AMEBC Meeting
Date: Wednesday, October 4, 2017 9:18:58 AM
Attachments: 6281_9 - ENV compliance and enforcement overview 2017.docx
RE Question 2017-09-29 AME BN.msg
Importance: High

Can you assist? Is the attached email you sent the same issue?

From: Jonker, Jennifer B ENV:EX
Sent: Wednesday, October 4, 2017 9:16 AM
To: Danks, Anthony ENV:EX; Trotzki, Peter O ENV:EX; Gooderham, Coleen E ENV:EX; Cao, Shihang ENV:EX
Cc: Jonker, Jennifer B ENV:EX
Subject: QUESTION: AMEBC Meeting
Importance: High

Morning –

I'm not sure the best person to ask about this...David is curious about the AMEBC meeting...if there is one. If so, who's attending, when and where. Do we have materials prepared?

David's Question: Can you confirm whether there is a meeting with AMEBC (exploration association). There was confusion with Mining Association. Unless there is a meeting set up. Let's wait on this one.

Can anyone assist and get back to me asap?

Thanks,
Jennifer.



Jennifer Jonker

Division Issues Manager
Environmental Protection | Environmental Sustainability and Strategic Policy
Ministry of Environment and Climate Change Strategy
☎ 250-387- 6002 | ✉ Jennifer.jonker@gov.bc.ca

Overview of ENV Compliance and Enforcement

Issue:

An overview of how the Ministry of Environment ensures compliance with its regulatory requirements.

Background:

Ensuring compliance with its regulatory requirements is one of the ministry's principal objectives. From pollution prevention to pest management to commercial activities in provincial parks, the ministry works with regulated parties to achieve compliance, rectify problems and ultimately minimize the harm to human health and the environment. When compliance is not achieved through voluntary efforts, or when the gravity of the violation it is significant, the Ministry pursues progressive enforcement action.

The Ministry's **Compliance Management Framework** provides the strategic context for its compliance and enforcement program. It includes the principles, goals and objectives that guide compliance-related work. It also outlines the ministry's approach to ensuring the effective delivery, management and reporting of compliance activities.

The **Compliance and Enforcement Policy and Procedure** provides operational guidance to ministry staff in responding to non-compliance. It outlines the procedures all staff follow to ensure a risk-based assessment of non-compliance and guides staff on the selection of the most appropriate enforcement response. The policy provides consistency, clarity and predictability regarding the consequences of non-compliance, as well as assurance that ministry resources are directed to the highest priorities. The balanced and principled use of compliance and enforcement tools demonstrates the ministry's commitment to building public confidence.

Ministry compliance and enforcement staff have defined skills and authorities.

- **Program staff** (environmental protection officers, pesticide officers) undertake inspections to verify compliance and are equipped to issue advisories, warnings, orders and administrative penalties (fines) and sanctions (for example, suspending or cancelling a permit); Park Rangers issue verbal warnings and violation tickets for unauthorized activities in BC Parks and Protected Areas.
- **Conservation Officers** are authorized to investigate non-compliance and issue violation tickets and lay formal charges. Laying formal charges may result in a court conviction.

In recent years the Ministry has expanded its tools, including the use of administrative monetary penalties and restorative.

Environmental Compliance and Enforcement Reporting

The ministry is a national leader in environmental enforcement reporting. The enforcement reporting program has two goals:

1. demonstrate government's commitment to transparency; and
2. promote deterrence among regulated parties and the public.

The ministry produces a variety of public reports:

Quarterly Environmental Enforcement Summary

- is published on the ministry's website four times per year. This report includes the orders, administrative sanctions, violation tickets, court convictions and restorative justice cases of the Ministry. It also includes orders issued by the Environmental Assessment Office and enforcement actions under some of the legislation administered by the Ministry of Forests, Lands and Natural Resource Operations.

Environmental Violations Database

- is an online searchable database of all the data included in the quarterly summaries, dating back to 2006. Currently, there are over 23,000 enforcement actions and \$9M in fines recorded in the Environmental Violations Database.

Compliance Inspections Report (new in 2016)

- reported on the 600+ inspections conducted under the *Environmental Management Act*, naming all the companies that were in and out of compliance.

Environmental Fines Collection

- Effective mechanisms must be in place for collecting environmental fines if they are to have the intended effect on deterring harmful behaviours. In the past, less than half of the penalties imposed by the courts were paid. Over the last few years, the ministry put in place new mechanisms to improve the collection rates of both tickets and court fines. Currently, 91% of court fines are paid and this information is reported to the public on an annual basis.

Contact information:

Anthony Danks, Executive Director
Strategic Policy Branch
Ministry of Environment
250-387-8483

From: [Dale, Alec R ENV:EX](#)
To: [Jonker, Jennifer B ENV:EX](#)
Cc: [Morrison, Ken ENV:EX](#); [Welsh, Leah ENV:EX](#)
Subject: RE: Question: 2017-09-29 AME BN
Date: Tuesday, October 3, 2017 2:47:18 PM

Just FYI, I spoke with Diana Walls from AME today and she mentioned generally that their interests were WSA, SAR/caribou, Prof Reliance, and EA/CEAA (substitution) and that they are coming with a very collaborative tone to the meeting and an appreciation for the interactions they have had with the new gov't to date.

I think our notes that we provided are still fine for SAR/caribou. I am not sure if WSA/Prof reliance were included in the note, so a heads up that those are topics of interest.

AD

From: Jonker, Jennifer B ENV:EX
Sent: Friday, September 29, 2017 2:42 PM
To: Dale, Alec R ENV:EX
Cc: Morrison, Ken ENV:EX; Welsh, Leah ENV:EX
Subject: RE: Question: 2017-09-29 AME BN
Thanks All!!!

From: Jonker, Jennifer B ENV:EX
Sent: Friday, September 29, 2017 2:36 PM
To: Dale, Alec R ENV:EX
Cc: Morrison, Ken ENV:EX; Welsh, Leah ENV:EX; Jonker, Jennifer B ENV:EX
Subject: Question: 2017-09-29 AME BN

To confirm, as I don't have access to the original BN, has Parks added their information in?? I do see some Parks information, but wasn't sure what was added....I only see tracked changes from Alec.

Thanks,
Jennifer.

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Sent: Friday, September 29, 2017 2:20 PM
To: Jonker, Jennifer B ENV:EX
Subject: 2017-09-29 AME BN

My edits still in track changes here, but you can just accept them I think.

AD

From: [Dale, Alec R ENV:EX](#)
To: [Jonker, Jennifer B ENV:EX](#)
Subject: RE: QUESTION: AMEBC Meeting
Date: Wednesday, October 4, 2017 9:35:00 AM

It is related to the note I sent yesterday and original request to add bullets came from David, so I am confused, but assume it is sorting out in the execusphere.

From: Jonker, Jennifer B ENV:EX
Sent: Wednesday, October 4, 2017 9:21 AM
To: Gooderham, Coleen E ENV:EX
Cc: Miller, Mary ENV:EX; Cao, Shihang ENV:EX; Dale, Alec R ENV:EX; Trotzki, Peter O ENV:EX
Subject: RE: QUESTION: AMEBC Meeting

Thanks Coleen.

I'll follow up with Mary for details.

From: Gooderham, Coleen E ENV:EX
Sent: Wednesday, October 4, 2017 9:19 AM
To: Jonker, Jennifer B ENV:EX
Cc: Miller, Mary ENV:EX; Cao, Shihang ENV:EX
Subject: FW: QUESTION: AMEBC Meeting
Importance: High

Hi Jennifer

All meetings queries go through Mary.. (for future meeting requests) pls nudge David on this process.. ☺.

The AMEBC meeting is now confirmed for October 17 at 11:00.

Shihang will be sending cliff/eapps information to Mary to action.

Thank you Coleen

From: Jonker, Jennifer B ENV:EX
Sent: Wednesday, October 4, 2017 9:16 AM
To: Danks, Anthony ENV:EX; Trotzki, Peter O ENV:EX; Gooderham, Coleen E ENV:EX; Cao, Shihang ENV:EX
Cc: Jonker, Jennifer B ENV:EX
Subject: QUESTION: AMEBC Meeting
Importance: High

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Thanks,

Jennifer.



Jennifer Jonker

Division Issues Manager

Environmental Protection | Environmental Sustainability and Strategic Policy

Ministry of Environment and Climate Change Strategy

☎ 250-387- 6002 | ✉ Jennifer.jonker@gov.bc.ca

From: [Diana Walls](#)
To: [Dale, Alec R ENV:EX](#)
Subject: AME BC Call re Caribou

From: Diana Walls
To: [Dale, Alec R ENV:EX](#)
Subject: RE: Re your call
Date: Monday, November 27, 2017 3:55:28 PM
Attachments: [image002.png](#)

A huge THANK YOU Alec!
Here we go....!

Have a great evening, and I will look forward to chatting tomorrow.

Di



Diana Walls
Senior Director, Strategic Policy
AME | Association for Mineral Exploration
T: 604.630.3924
C: 778.836.9850

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www.amebc.ca/roundup Twitter: #ameRU



From: Dale, Alec R ENV:EX [<mailto:Alec.Dale@gov.bc.ca>]
Sent: Monday, November 27, 2017 3:54 PM
To: Diana Walls
Subject: RE: Re your call
Hi Diana, the document is posted and comments open until Jan 5th
http://www.registrellep-sararegistry.gc.ca/document/default_e.cfm?documentID=3202

From: Diana Walls [<mailto:dwalls@amebc.ca>]
Sent: Monday, November 27, 2017 12:28 PM
To: Dale, Alec R ENV:EX
Subject: RE: Re your call
Thanks Alec!

I agree with your recommendation for a little 'pre-read' refreshment.... While we are generally supportive of the s. 11 approach, I am anticipating a few heart-stoppers given the status of the Quintette population/herd.

Good to know that the deadline will be the 5th....that gives me a little more breathing room.s.22

s.22

I'll keep my eyes peeled, and I also appreciate your kind offer to let me know when you get word that it's posted.

Thank you!

Chat soon....

Di



Diana Walls
Senior Director, Strategic Policy
AME | Association for Mineral Exploration
T: 604.630.3924
C: 778.836.9850
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From: Dale, Alec R ENV:EX [<mailto:Alec.Dale@gov.bc.ca>]

Sent: Monday, November 27, 2017 12:22 PM

To: Diana Walls <dwalls@amebc.ca>

Subject: RE: Re your call

Ah, you are about it being today on their site. Sorry, I thought they were aiming for 30th, but I have not seen any notification about it being posted yet today. I will send a note if I do.

I think the deadline for comments will be January 5th regardless of when it comes out.

That all said, as you note, things are a bit fluid with releases at fed level.

A

s.22

From: Diana Walls [<mailto:dwalls@amebc.ca>]

Sent: Monday, November 27, 2017 12:16 PM

To: Dale, Alec R ENV:EX

Subject: RE: Re your call

Thank you Alec!

...I guess that means I will have to dig deep to find my patience! I had understood from the Feds' Backgrounder that it was to be released today, but I know these timelines are fluid. Also helpful is that it would take the submission deadline to the other side of the holiday: S.22

Have a good afternoon!

Di



Diana Walls
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From: Dale, Alec R ENV:EX [<mailto:Alec.Dale@gov.bc.ca>]

Sent: Monday, November 27, 2017 12:12 PM

To: Diana Walls <dwalls@amebc.ca>

Subject: RE: Re your call

Thanks Diana, I believe the S.11 agreement will not be posted until later this week.

From: Diana Walls [<mailto:dwalls@amebc.ca>]

Sent: Monday, November 27, 2017 12:09 PM

To: Dale, Alec R ENV:EX

Subject: RE: Re your call

Hi Alec,

Tomorrow morning is just great.... 9:00am it is. I will call you.

I hope your day gives you a little breathing room along the way.

As a sideline, are you in possession of the s.11 Conservation Agreement that is shareable? I am monitoring the public consultation page on the SARA registry but it's not there yet (unless I am missing it!).

Thank you very much again Alec,

Diana



Diana Walls

Senior Director, Strategic Policy

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C: 778.836.9850

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From: Dale, Alec R ENV:EX [<mailto:Alec.Dale@gov.bc.ca>]

Sent: Monday, November 27, 2017 12:05 PM

To: Diana Walls <dwalls@amebc.ca>

Subject: RE: Re your call

Hi Diana, yes, sadly my day has filled in. 9-9:30 still works tomorrow though. I will send an outlook invite. If that does not work, just call me at 9:00 at the number in my signature block.

Cheers

A

Alec Dale

Executive Director, Ecosystems Branch

B.C. Min. of Environment & Climate Change Strategy

Mailing: PO Box 9338 Stn. Prov. Govt. Victoria, B.C. V8W 9M1

Office: 525 Superior Street, Victoria BC V8V 1T7

Tel: 778-698-4384

Email: alec.dale@gov.bc.ca

From: Diana Walls [<mailto:dwalls@amebc.ca>]

Sent: Monday, November 27, 2017 11:01 AM

To: Dale, Alec R ENV:EX

Subject: RE: Re your call

Thank you for your message Alec,

You have had a busy few days of late! I would be grateful to connect at some point today – which I realize is well underway! I am unavailable between 2:15-3:45...otherwise I am entirely at your mercy.

If I have lost my window of opportunity for today, I can catch up between 9-9:30am tomorrow morning.

I look forward to speaking with you soon,

All the best,

Diana



Diana Walls
Senior Director, Strategic Policy
AME | Association for Mineral Exploration
T: 604.630.3924
C: 778.836.9850

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www.amebc.ca/roundup Twitter: #ameRU



From: Dale, Alec R ENV:EX [<mailto:Alec.Dale@gov.bc.ca>]

Sent: Friday, November 24, 2017 8:36 AM

To: Diana Walls <dwalls@amebc.ca>

Subject: Re your call

Hi Diana, sorry for not responding sooner. I received your voice mail but have either been in meetings or interviews the last few days and I am in interviews again all day today. Is there a time next week that is good to call you back? I have some times interspersed throughout Monday, but am totally open from 9-11:00 on Tuesday if that works to schedule something? If not let me know some good times for you and I will make something work.

Cheers

Alec

Alec Dale

Executive Director, Ecosystems Branch

B.C. Min. of Environment & Climate Change Strategy

Mailing: PO Box 9338 Stn. Prov. Govt. Victoria, B.C. V8W 9M1

Office: 525 Superior Street, Victoria BC V8V 1T7

Tel: 778-698-4384

Email: alec.dale@gov.bc.ca

From: [Dale, Alec R ENV:EX](#)
To: [Rasmussen, Paul FLNR:EX](#)
Subject: Diana Walls AMEBC
Date: Tuesday, November 28, 2017 3:18:00 PM

Hi Paul, per our call, I spoke with Diana this am (she has called me in the past re SAR leg/caribou) and asked some high level questions re S.11, all of which were pretty straight forward and I was able to answer. She did want to get the latest mapping re Quintette boundaries so I told her to connect with you and/or Chris for that. She was just trying to get as much info on high level intent for her members as possible. She seemed happy with my responses. I can't remember all the questions, but things like will it form a template moving forward (high-level yes, details would change and likely not for a lot more species), how does it fit with SAR leg/Landuse planning moving forward (working on it), is this all for the central herds or is more planning anticipated (more anticipated, and I spoke with her about the SDM approach and she was enthusiastic about that). Just wanted to keep you in the loop.

A

Alec Dale

Executive Director, Ecosystems Branch
B.C. Min. of Environment & Climate Change Strategy
Mailing: PO Box 9338 Stn. Prov. Govt. Victoria, B.C. V8W 9M1
Office: 525 Superior Street, Victoria BC V8V 1T7
Tel: 778-698-4384
Email: alec.dale@gov.bc.ca

Piana Walls AME

Oct 3/17

- work plans for their fiscal sept - Sept.
- tone & engagement.
- min & metals key to future
 - robust reg system
 - good with F&V
- ^{Want to} position BC as good player - ^{BC} leader in responsible dev.
 - public awareness & confidence
- Prof Reliance - very interested
- - gl'd not a wholesale review - but fix not working
- Caribou/SAR
- WSA - of interest - min exp low volume H₂O
 - but lumped in with lgr users - exemptions
 - Placer grouped in
 - perm exemption

- hope it moves forward.
- feeling anxious re timing of expiration
- CEAA / substitution - want to see continue
- 1^o SAR / WSA / Prof Rel.

Cribbar

- Minerals are where they are - no choice
- sizeable land base to explore → economic benefits
- tricky balance.
- concern over duplication vs integration

Calls re-starting.

From: Trumpy, Chris EMPR:EX
To: Wheler, Francesca M IRR:EX; Dolhaine, Daphne ENV:EX
Subject: FW: AME-DM Agenda Nov 25 (2)
Date: Tuesday, November 28, 2017 4:27:47 PM
Attachments: AME-DM Agenda Nov 25 (2).docx

Francesca, Daphne,

Just wanted to confirm you would be able to provide me a couple of bullets on Nenqay Deni Accord (Francesca) and SARA (Daphne)? Sorry just working on some tight timelines as AME is mtg with DMs on Friday.

Thanks

Chris

From: Trumpy, Chris EMPR:EX
Sent: Monday, November 27, 2017 8:58 AM
To: Dolhaine, Daphne ENV:EX; Bawtinheimer, Brian FLNR:EX; Puggioni, Giovanni IRR:EX; Wheler, Francesca M IRR:EX; Craven, Paul EAO:EX; Berardinucci, Julia F ENV:EX
Cc: Wijtkamp, Peter EMPR:EX; Ellis, Rose FLNR:EX
Subject: AME-DM Agenda Nov 25 (2)

Hi all,

AME is meeting with DM's next Monday, I have attached the current draft of the agenda. What I would like to do is build an annotated agenda with 3-4 bullets for each item (I think I have identified the correct people but if not let me know). If you could identify timelines and plans for engagement as part of the bullets those will likely be questions AME has.

If you could get back with your bullets by EOD Wednesday that would be appreciated.

Any questions feel free to give me a call,

Chris

BC Government Deputy Ministers & AME Meeting

Friday, December 1, 2017; 10:30 AM to 1:30 PM

s.15

AME Representatives

Diane Nicolson, Chair of AME Board of Directors
Edie Thome, President & CEO
Glen W Wonders, VP (Gov. & Tech Affairs)
Diana Walls, Senior Director of Policy

BC Government Representatives

Dave Nikolejsin, DM - EMPR
Tim Sheldan, DM - FLNRO
Doug Caul, DM - MIRR
Mark Zacharias, DM – MoE & CC
Peter Robb, ADM-EMPR

DRAFT AGENDA

General Purpose of Meeting:

To reconvene regular bi-annual meetings between key Deputy Ministers and senior Association for Mineral Exploration (AME) representatives to collaboratively discuss matters of importance to the Government of British Columbia and pertinent to the interests of AME. These interests are varied but will include subjects important to furthering responsible mineral exploration and development in British Columbia.

1. **Welcome and Safety Message: Dave Nikolejsin**
2. **Introductions, Confirm Agenda**
3. **Updates on Previous Business: AME**
4. **AME Comments and Priorities**
 - a. State of Sector
 - b. AME Strategic Plan
 - c. Report out on AME Government & Industry Workshop
5. **Alignment of Natural Resource Priorities**
 - a. Species at Risk (Caribou and Legislation)
 - b. UN Declaration on the Rights of Indigenous People
 - c. Environmental Assessment Revitalization
 - d. Land Use Planning
6. **Other Topics for Discussion:**
 - a. Water Sustainability Act

Comment [CT1]: Daphne

Comment [CT2]: Gio

Comment [CT3]: Paul

Comment [CT4]: Brian

Comment [CT5]: Julia

- b. **Nenqay Deni Accord and other Agreements**
- c. **Integrated Land Access**
- d. **Tenure Security**
- e. **Mineral Exploration Incentives**
- f. **Mining Jobs Task Force**
- g. **Roundup 2018**

- 7. **Action Items and Next Meeting Date**
- 8. **Closing Comments: Dave Nikolejsin**

Comment [CT6]: Francesca

Comment [CT7]: Brian – link to land use planning, this has to do with conditional designations restricting access to land

Comment [CT8]: Gio

Comment [CT9]: EMPR

DRAFT

From: [Dolhaine, Daphne ENV:EX](#)
To: [Trumpy, Chris EMPR:EX](#)
Subject: RE: AME-DM Agenda Nov 25 (2)
Date: Wednesday, November 29, 2017 10:35:00 AM

Let me know if this serves the purpose.

Daphne

Legislation for species at risk

- The Ministry of Environment has been mandated to bring in legislation for species at risk.
- Legislation that supports concrete positive conservation outcomes is important.
- By taking into account the social and economic interests of BC's communities and promoting transparency in decision making, we can also better support ecologically sustainable development.
- Building on the public engagement completed in 2016, ENV anticipates the public consultation, beginning in early 2018, will include:
 - A discussion paper posted to the public website to solicit written comments
 - Additional targeted stakeholder conversations to address specific issues
- ENV intends to reach out directly to AME to alert them about the consultation and to provide updates about the process.

From: Trumpy, Chris EMPR:EX
Sent: Wednesday, November 29, 2017 8:41 AM
To: Dolhaine, Daphne ENV:EX
Subject: Re: AME-DM Agenda Nov 25 (2)
Great thanks Daphne.

Sent from my iPad

On Nov 28, 2017, at 5:12 PM, Dolhaine, Daphne ENV:EX <Daphne.Dolhaine@gov.bc.ca> wrote:

Yes. My goal is Wednesday morning.

From: Trumpy, Chris EMPR:EX
Sent: Tuesday, November 28, 2017 4:28 PM
To: Wheler, Francesca M IRR:EX; Dolhaine, Daphne ENV:EX
Subject: FW: AME-DM Agenda Nov 25 (2)
Francesca, Daphne,

Just wanted to confirm you would be able to provide me a couple of bullets on Nenqay Deni Accord (Francesca) and SARA (Daphne)? Sorry just working on some tight timelines as AME is mtg with DMs on Friday.
Thanks

Chris

From: Trumpy, Chris EMPR:EX
Sent: Monday, November 27, 2017 8:58 AM
To: Dolhaine, Daphne ENV:EX; Bawtinheimer, Brian FLNR:EX; Puggioni, Giovanni IRR:EX; Wheler, Francesca M IRR:EX; Craven, Paul EAO:EX; Berardinucci, Julia F ENV:EX
Cc: Wijtkamp, Peter EMPR:EX; Ellis, Rose FLNR:EX
Subject: AME-DM Agenda Nov 25 (2)

Hi all,

AME is meeting with DM's next Monday, I have attached the current draft of the

agenda. What I would like to do is build an annotated agenda with 3-4 bullets for each item (I think I have identified the correct people but if not let me know). If you could identify timelines and plans for engagement as part of the bullets those will likely be questions AME has.

If you could get back with your bullets by EOD Wednesday that would be appreciated.

Any questions feel free to give me a call,

Chris

From: Diana Walls
To: ec.ep.rpy-sar.pyr.ec@canada.ca
Cc: sue.milburn-hopwood@canada.ca; ken.brock@canada.ca; Robb, Peter L. EMPR:EX; McGuire, Jennifer ENV:EX; Kriese, Kevin FLNR:EX; Trumpy, Chris EMPR:EX; Rasmussen, Paul FLNR:EX; Edie Thome
Subject: Association for Mineral Exploration Response to Government of Canada SARA Draft Section 11 Conservation Agreement for the Conservation of the Southern Mountain Caribou
Date: Monday, January 8, 2018 4:21:50 PM
Attachments: [image002.png](#)
[AME Response to Government of Canada SARA Conservation s.11 Agreement Southern Mountain Caribou - Final 2018-01-08.pdf](#)

On behalf of the Association for Mineral Exploration (AME) and our members, please find enclosed for your consideration our submission in response to the Draft SARA Section 11 Conservation Agreement for the Conservation of the Southern Mountain Caribou.

We invite your comments and welcome the opportunity to speak with you further about this important Agreement.

Yours sincerely,

Diana Walls



Diana Walls
Senior Director, Strategic Policy
AME | Association for Mineral Exploration
T: 604.630.3924
C: 778.836.9850

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January 8, 2018

Blair Hammond
Canadian Wildlife Service
Environment and Climate Change Canada
5421 Robertson Road, RR 1
Delta, BC V4K 3N2

Via email: ec.ep.rpy-sar.pyr.ec@canada.ca

Dear Mr. Hammond,

Re: Species at Risk Act (SARA) Section 11 Conservation Agreement for the Conservation of the Southern Mountain Caribou

The Association for Mineral Exploration (AME), on behalf of almost 5,000 members, is pleased to provide our written submission in response to the SARA draft Section 11 Conservation Agreement for the Conservation of the Southern Mountain Caribou.

AME would like to acknowledge the productive collaboration between the Canadian Wildlife Service/ECCC and the various ministries of the Province of British Columbia in developing on this inaugural Section 11 Conservation Agreement.

AME appreciates this opportunity to inform the federal decision-making process on the recovery and protection of southern mountain caribou in British Columbia. Equally, AME values our ongoing dialogue with the Federal Government and the Province of BC on the development of the specific measures that are proposed to protect and support the recovery of southern mountain caribou in the Province. We are steadfast that specific measures are best identified through a structured decision-making process that takes a broader ecosystem view, and is rooted in the best available evidentiary information.

Mineral resources that are critical to the global shift toward a greener economy are hidden, and the potential for new discovery is an evolving science driven by innovation and market demand. The inherent nature of mineral exploration requires a maximum search area at its early stages, often with little or no impact on the landscape. Unlike other sectors, this low impact early phase of exploration occurs over a protracted period, often in excess of 15 years. When considered thoughtfully and with broad collective input, we believe that these objectives do not have to represent an inescapable trade-off.

AME BC encourages your questions and discussion on our comments. Please feel free to contact me at 778.836.9850, 604.630.3924 or by email at dwalls@amebc.ca.

Yours truly,



Diana Walls
Senior Director, Strategic Policy
Association for Mineral Exploration British Columbia

Encl.

cc:

Sue Milburn-Hopwood, Assistant Deputy Minister of the Canadian Wildlife Service, Ministry of the Environment and Climate Change (sue.milburn-hopwood@canada.ca)

Ken Brock, Head of Stewardship for Canadian Wildlife Services, Pacific Yukon Region, Environment and Climate Change Canada (ken.brock@canada.ca)

Peter Robb, Assistant Deputy Minister, Ministry of Energy, Mines & Petroleum Resources (Peter.Robb@gov.bc.ca)

Jennifer McGuire, Assistant Deputy Minister, Environmental Sustainability and Strategic Policy, Ministry of Environment (Jennifer.mcguire@gov.bc.ca)

Kevin Kriese, Assistant Deputy Minister, Northern Area of the Regional Operations Division, Ministry of Forests, Lands, Natural Resource Operations and Rural Development (Kevin.Kriese@gov.bc.ca)

Chris Trumpy, Executive Director, Mines & Mineral Resources Division, Ministry of Energy & Mines (Chris.Trumpy@gov.bc.ca)

Paul Rasmussen, Executive Director, Provincial Caribou Recovery Program, Ministry of Forests, Lands, Natural Resource Operations and Rural Development (Paul.Rasmussen@gov.bc.ca)



**Comments
on the
Draft Species at Risk Act (SARA) Section 11
Conservation Agreement for the
Conservation of the Southern Mountain
Caribou**

January 8, 2018

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1. INTRODUCTION

On behalf of the Association for Mineral Exploration (AME) and our members, we are pleased to provide this written submission in response to the Draft Species at Risk Act (SARA) Section 11 Conservation Agreement for the Conservation of the Southern Mountain Caribou - Central Group (Agreement). Woodland caribou are an important wildlife species to all Canadians, and are intrinsically linked to the rights, traditional values and wellbeing of many Indigenous peoples in Canada.

AME would also like to acknowledge and applaud the productive collaboration between the Canadian Wildlife Service/Environment and Climate Change Canada (ECCC) and the various ministries of the Province of British Columbia in embarking on this inaugural Section 11 Conservation Agreement. This optimal approach allows for practical mechanisms to be evaluated, undertaken and measured to support the recovery of the Central Group of southern mountain caribou and their critical habitat.

Respecting the parameters of SARA, AME appreciates the opportunity to engage with ECCC to inform the content of the Agreement. Similarly, we welcome the ability to inform future agreements between Canada and British Columbia, and with directly affected First Nations concerning southern mountain caribou in British Columbia. Equally, AME values its ongoing dialogue with the Province of British Columbia on specific actions and measures that will form part of this Agreement to protect and support the recovery of the Central Group of southern mountain caribou in the Province.

As the first of its kind under SARA, it is essential to set a sound precedent for similar future undertakings. AME urges both levels of government to continue proceeding with care and to establish common understanding of critical habitat based on a foundation of complete scientific data, an understanding of the landscape, targets and thresholds. Decisions on specific actions and measures must be based on open information sharing and structured decision making among impacted rights holders and stakeholders. This will allow for continuously improved processes, and more crucially, productive outcomes.

2. ABOUT THE ASSOCIATION FOR MINERAL EXPLORATION

AME is the lead association for the mineral exploration and development industry based in British Columbia. Established in 1912, AME BC represents, advocates, protects 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. AME is a not-for-profit association, funded by its membership; it receives no government funding.

AME's membership is diverse, ranging from individual prospectors and small junior companies to major multi-national companies and industry suppliers. Many of our members are public companies listed on the Toronto, as well as international, stock exchanges. While most AME members are focused on British Columbia, many also work across Canada and around the world in mineral and coal exploration and development, with some major companies operating producing mines. Junior exploration companies, unlike companies that have an operating mine and source of revenue, need to secure access to venture capital to fund mineral exploration projects, especially early-stage projects. These projects will help replenish the nation's depleting inventory of mineral development and production projects.

3. SARA SECTION 11 CONSERVATION AGREEMENT – AN INTEGRATED APPROACH

AME strongly supports the approach taken by Canada and British Columbia to develop this Section 11 Agreement, enabling the recovery of the central group of southern mountain caribou toward the identified short, medium and long-term targets. Setting out an array of integrated habitat and non-habitat conservation measures with corresponding metrics, and provisions to report on and evaluate their effectiveness over an appropriate term during which recovery can be reasonably evaluated, is the optimal approach to achieving localized recovery objectives. Furthermore, the Agreement's proposed collaboration and partnership with directly affected First Nations, as well as the inclusion of stakeholder input and involvement are important cornerstones of its successful implementation.

The approach to recovery efforts that acknowledges First Nations rights, and the need to balance these efforts with other biological, jurisdictional and socio-economic objectives is crucial to the success and durability of this proposed Agreement. Foundational to this approach is a shared and structured decision-making throughout the term of the Agreement that is based upon best available evidence.

AME agrees that the population trajectory for the central group population of southern mountain caribou requires swift attention and well-conceived and targeted action. Habitat destruction arising from anthropogenic sources, and its corresponding effects on predator/prey relations and vegetation sources, is widely regarded as one of the contributors to the decline in caribou populations in Western Canada; yet more importantly, it can also be the contributor to the solution over the longer term.

AME is encouraged by a number of the specific features of the draft Agreement, including those proposed in Appendix B.

Paramount is the acknowledgement that best available scientific data, other evidence and spatial data are the foundation for decision making under this Agreement. Many measures are proposed and contemplated within the Appendix of the draft Agreement that only with sound evidence can be prioritized, affirmed or adapted throughout the term of the Agreement. The commitment to obtain this data and knowledge, and continuously update it, will allow for the successful and integrated implementation of the Agreement, adaptive management, and the advancement toward its targeted outcomes. AME cautions Canada and British Columbia in advancing its implementation plan ahead of best available evidence and spatial data.

We are further supportive of the inclusion of habitat restoration measures as a pillar of the Central Group recovery strategy. Functional and ecological habitat restoration efforts in other jurisdictions have been shown to positively impact the short-term calf recruitment and long-term survivability of southern mountain caribou populations. The mineral exploration sector sees the opportunity to further partner with its industry peers, Indigenous communities and the Province in undertaking efforts to minimize the impacts of existing disturbances. We encourage the consideration of public-private partnerships in collaboration with directly affected First Nations as a backbone to the implementation of this important element of the Central Group population recovery strategy. This can also be complemented by timely reclamation of disturbed sites, and the regulatory processes to facilitate it.

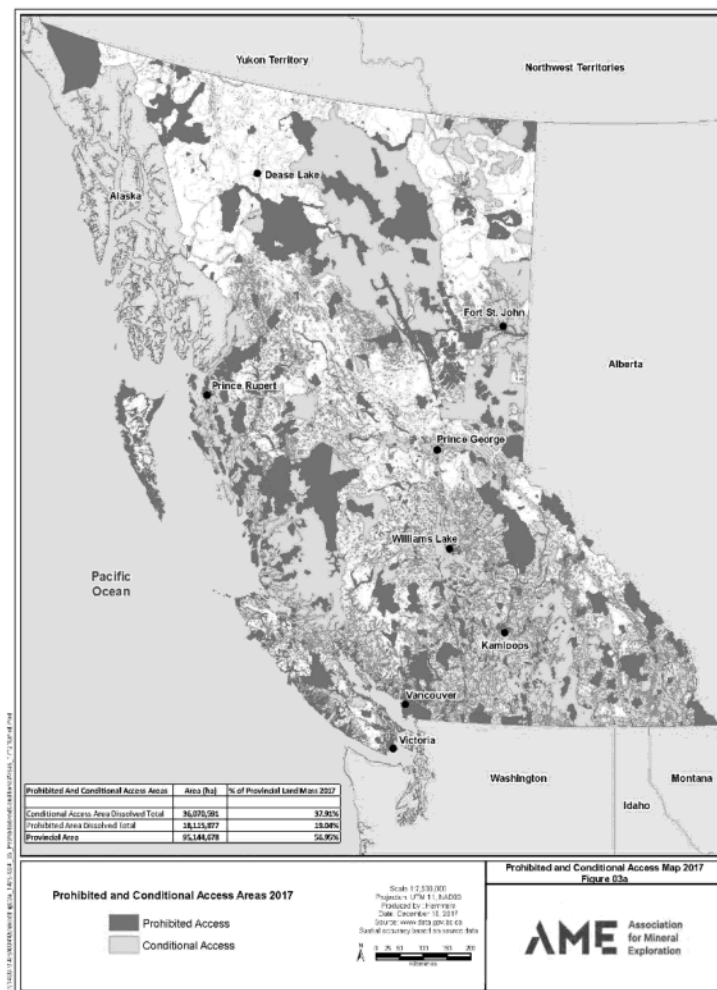
Consideration of such plans is dependent on the wellbeing of the mineral exploration and development sector, which requires a sustainable inventory of projects and access to capital. Should the impacts of land reclassifications serve to adversely impact the valuation of the sector's assets, even on a regional basis, it will result in the inability to support the restoration efforts and strategy. It is important to maintain a viable mineral exploration sector to ensure its ability to meet its obligations, manage its liabilities and support the restoration and improvement of caribou habitat in the Province.

The proposed guidance for statutory decision makers for possible incursions into caribou habitat, including possible mitigations, will provide highly valuable clarity for proponents, operators and regulators alike.

With our generalized support of the draft Agreement, AME provides the following cautionary comments that reflect the priority concerns of our members, and which are fundamentally crucial to the viability of the Province's mineral exploration and mining industry.

APPENDIX B: TABLE A – HABITAT MANAGEMENT – Protection (A1-A6)

AME's members respect the importance of high value, critical habitat that currently supports caribou populations as a key element of the recovery strategy for the Central Group local population unit. Yet, of greatest priority to the sustainability of British Columbia's mineral exploration and mining sector is access to land. Currently, 57% of the land base in BC is either permanently closed to mineral exploration and development or subject to a broad range of temporal, spatial and operational restrictions. These conditions are over and above the normal suite of regulatory provisions that the Province has established to govern how mineral exploration is undertaken.



The proposal to protect 90% of high elevation summer and winter habitat, as well as an unspecified proportion of non-high elevation habitat is of utmost concern, due in most part to its lack of defined qualitative, spatial or temporal references. In particular, the absence of any contextual information for non-high elevation habitat,

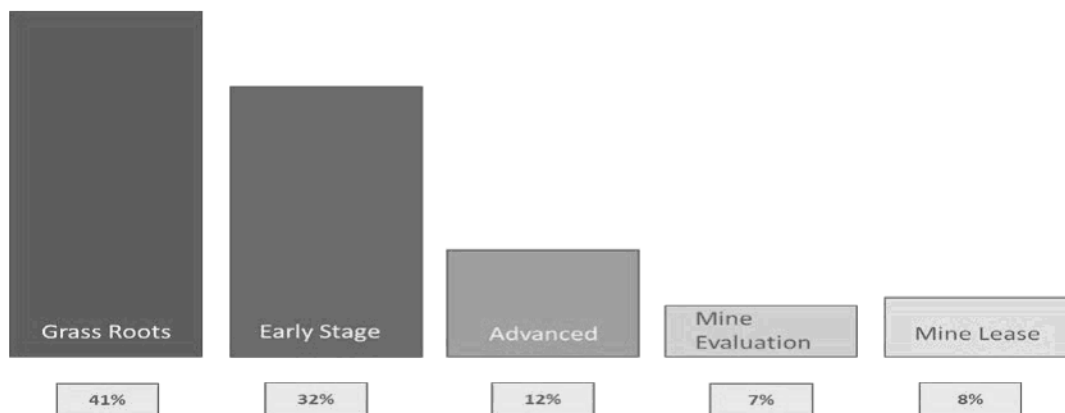
including corresponding protection objectives, targets or thresholds is concerning for the mineral exploration sector.

AME seeks to understand the basis upon which these areas are to be identified, and the spatial and scientific evidence that supports the identification, classification and ongoing evaluation of these areas.

As one of the many rights holders to these lands, or lands in proximity thereto, we seek to understand the process by which decisions will be made to identify and protect specific habitat areas. Further, we seek guidance on the ongoing evaluation of these lands, re-classification of these lands, and the consideration of granting access to portions these lands to better understand the subsurface structure and resource base to enable fully informed and balanced decision making.

High value or critical caribou habitat areas will conceivably exist on lands that have already been identified as prospective for mineral exploration and development, through such evidence as existing tenure or historic mineral exploration activity. In such cases, we invite the consideration of a timely evaluation and structured decision-making process for the review of caribou populations that are supported by this habitat, and the potential for the expedient return of these prospective lands to industrial usage for the purposes of ongoing mineral exploration.

Generally, it is estimated that 1 out of every 10,000 grassroots exploration projects will reach the development phase. Each exploration program creates value to British Columbians through community and regional economic development, and by increasing the geological knowledge of a region. The exploration life cycle that guides this evolution is broken down into several stages:



Proportion of projects by stage according to the British Columbia Mineral and Coal Exploration Survey, 2016

The focus of exploration activities in BC are on the Grassroots and Early Stage phases, which are characterized by minimal disturbance, if any. The objectives of these phases are to identify potential areas of interest or targets, with some initial geoscience testing and evaluation.

Activities, including light industrial uses, that do not materially disturb forest regeneration, or existing habitat features can continue, particularly if they support industrial development horizons such as those characteristic of mineral exploration and development. Further, such low-impact activities could provide useful data to support the short-term evaluation of these habitat areas, and to adjust the protections to reflect new scientific data that better informs the optimal use of this land base.

Therefore, measures that reference the consideration of voluntary tenure and permit deferrals pose questions about the extent of the land base that would remain available over time, and the extent to which we can fully understand the mineral endowment owned by all British Columbians.

The long-term population objectives set out in this Agreement are targeted for achievement within a 50-year timeframe. It is conceivable that the proposed deferral of tenure could be expected to remain in place for at least this length of time. AME anticipates that, should this land support new caribou populations of any size in the future, such a return to an industrial usage classification could be inconceivable under the current legislative framework protecting the species. In the short term, the decision may be to appropriately compensate the tenure holder for their loss of the asset value and investment, which would encourage investment in other jurisdictions. On a longer-term basis, the Province and Canada must consider the impacts to all citizens that these constraints or forfeitures will have on the investment in relatively low impact activities, and ultimately, accessibility of high value resources for our low carbon future.

Equally, consideration should be given to the longer-term negative and multiple carry-on effects on the communities that sustain themselves on mineral exploration and development by removing access to land for the purposes of exploration. More than 66% of exploration companies indicate that over 50% of their budget is spent locally, with over 30% of companies indicating that 90% or more was spent in local communities.¹ In 2010, input-output modelling methodology indicated that for every \$1 spent in the mining industry, \$1.73 of direct, indirect and induced economic impacts resulted.² When taken in reverse, the impacts are considerable, and enduring – notably for rural populations.

Similarly concerning are the multiple references to tenure aggregation as a habitat protection measure. Important to guide the broad assessment of potential impacts of this measure is the understanding of the scope and nature of the tenure aggregation proposed. If tenure aggregation is interpreted as the spatial accumulation or aggregation of issued tenure and permitted activities, the impacts of this aggregation amplify the concerns associated with the tenure deferrals.

Tenure aggregation could, however, contemplate temporary disturbance offsets as its mechanism. AME acknowledges that this approach offers merit in mitigating the impacts of increased habitat fragmentation, particularly when the offset lands are in high-value caribou habitat areas in which there is a known population unit benefiting from these interim protections.

However, a key consideration for the long-term success of this approach is identifying measures to return all or a portion of the offset lands and their tenure to industrial usage in the future, following the reclamation of the temporary disturbance. When assessing this offset approach in the aggregate of known and future mine projects, this could result in the unintended permanent removal of lands by the Province, and the effective elimination of future mineral development in these areas. This de-facto reclassification of land has further impacts on the asset value by effectively rendering it of no economic or market value. AME strongly suggests that a mechanism be developed to identify the geographic extent of the land to be offset, identify the mineral tenure that would be impacted, and include a legal provision to protect those tenures from forfeiture provisions for the life of the offset.

Exhibit A within Appendix I attached hereto depicts the mineral tenure held within wildlife habitat areas that address the protection of caribou within British Columbia. The impacts of these habitat protection measures on existing tenure can be clearly understood. However, the mineral potential and opportunity cost of forfeiting future exploration activities is not reflected in this Exhibit.

¹ British Columbia Mineral and Coal Exploration Survey 2016 Report, p.10

² http://www.mining.bc.ca/sites/default/files/resources/pwcmining-economicimpactanalysis_1.pdf

4. ACKNOWLEDGING GLOBAL AND LANDSCAPE LEVEL FACTORS IN CARIBOU RECOVERY

Of increasing importance is understanding the role that global and landscape level factors have on wildlife habitat, such as global pollution (e.g. acid rain) and climate change. AME understands and respects that factors beyond the direct control of the parties to the draft Agreement, including climate change and fire, are outside the scope of the Agreement. Nonetheless, AME encourages Canada to retain its attention on these matters in recognition of their broad importance on the survivability of southern mountain caribou, and all other species, within its jurisdiction.

*[...C]aribou need a specialized habitat, with an undisturbed lichen-rich environment. Global warming has affected the environment of reindeer and caribou worldwide, causing a loss of needed habitat.*³ The timeframe within which lichen, the essential winter food source for caribou, can naturally regenerate in an area disturbed by environmental or industrial interventions, such as forest fire, is estimated to start after roughly 16 years⁴. When compared to the average lifespan of southern mountain caribou, the importance of a long-term, multi-generational recovery strategy is clear.

Efforts to advance evidence-based research to support the implications of climate change factors, such as forest fires, changing snow pack, and temperature changes on forest growth, lichen regeneration and the timing of migratory cycles of caribou relative to peak nutritional value of seasonal vegetation are specifically beneficial to caribou.

5. RECOMMENDATIONS TO SUPPORT CARIBOU RECOVERY & MINERAL EXPLORATION IN BC

AME and its members advocate for broad-ranging, integrated and long-term planning to support the recovery of the Central Group of southern mountain caribou in the Province. We are supportive of efforts that are centered on generating optimal survivability and recovery within clearly defined high-value habitat areas, as well as population management measures and scientific research that generate the greatest short term and long-term benefit to the recovery of the species. The Agreement offers a sound framework to initiate and monitor this effort, and we offer the following recommendations.

1. Invest in **best available evidence-based scientific research, knowledge and spatial data** on the Central Group of southern mountain caribou, caribou habitat, caribou migratory patterns and nutritional value of lichen and summer forage. This should form the basis of all measures contemplated under the Agreement, and should inform the prioritization and inter-dependencies of the measures proposed. Similarly, new measures may be identified that are of higher potential benefit to survivability of this population group. More crucially for the overall wellbeing of the region, research and planning activities should incorporate an ecosystems approach that considers other biological values and objectives, so as to avoid forsaking certain critical values in favor of another.
2. On matters of importance to an industrial sector, rights holder or stakeholder group, such as land reserves, tenure and permit deferrals, and tenure aggregation, **implement a shared and structured decision-making approach** to enable balanced decision making and a full understanding of the trade-offs being contemplated. The shared understanding of diverse scientific, economic, social or values-based objectives, their respective consequences and the identification of alternative measures or trade-offs results in an optimal outcome that can be broadly supported and successfully implemented over the longer term.

³ <http://www.digitaljournal.com/news/environment/canada-s-caribou-habitat-endangered-because-of-climate-change/article/364154>

⁴ https://www.researchgate.net/publication/277243839_Survival_persistence_and_regeneration_of_the_reindeer_lichens_Cladonia_stellaris_C_rangiferina_and_C_mitis_following_clearcut_logging_and_forest_fire_in_northwestern_Ontario

3. ***Defer only a small set of industrial and land use activities, notably those of highest impact*** in lower priority caribou habitat areas. These lower priority habitat areas may include matrix areas or areas which have been impacted by natural incursions such as fire or avalanche. Activities including light industrial uses, that do not materially disturb forest regeneration, or existing habitat features can continue if they support longer term industrial development horizons. Further, such low-impact activities could provide useful data to support the short-term evaluation of these habitat areas, and to adjust the protections to reflect new scientific data that better informs the optimal use of this land base.
4. Consider the ***financial wellbeing of the industries*** that will help implement the provincial strategies to rehabilitate caribou habitat and help fund population management practices. Natural resource-based sectors help sustain the local communities in immediate proximity to caribou habitat areas across the Province. It is foreseeable that the immediate and direct effect that land use reclassifications and restrictions have on the asset value of a resource company. This in turn results in the loss in direct resource revenues for the local, regional and provincial governments and places an undue burden on resource industry-dependent rural communities.

AME has long advocated for the inclusion of potential mineral development in higher-level land designations, subject to intensive planning, innovation and oversight. It is important to keep our sights on transformative shifts in technology and the evolving market demand for minerals, as well as the future value of those minerals that have yet to be discovered. Land that may not be deemed to be valuable in terms of mineral potential today may support a viable mine in the future. As society's dependence on technology continues to grow, along with its expectations for alternative energy sources, specialty minerals and metals will be required. In addition to the advent of demand for minerals of no present value, this will drive mineral exploration to what may be deemed today to be low mineral potential lands.

6. IN CLOSING

AME reiterates its appreciation for the collaboration between the Canadian Wildlife Service/ECCC and the various ministries of the Province of British Columbia in developing this inaugural Section 11 Conservation Agreement. This optimal approach allows for practical methodologies to be evaluated, undertaken and measured to support the recovery of the Central Group of southern mountain caribou and their critical habitat.

We also wish to acknowledge the work that the Province of British Columbia is actively undertaking to manage the broader biodiversity and ecosystems throughout the Province, including those that may feature endangered or listed species. AME is confident that the well-researched and conceived outcomes will both complement and harmonize with the objectives set out in this Agreement.

The Province's deliberate balancing of environmental stewardship with the responsible recovery of the Province's natural resource endowment, building strong and skilled rural and urban communities, and maintaining a fiscally responsible public policy framework position British Columbia favorably among investors.

As we see increased expectations among investors to develop resources with deference to environmental and social values, the Province provides further value to prospective investors.

Equally important to the manufacturing sector is its ability to secure a supply of raw materials that is stable, and responsibly sourced and harvested. We expect to see a greater demand placed upon manufacturers of consumer technology goods to demonstrate their responsible sourcing with the imminent wave of millennial consumers.

The ability of the Province to ensure the access and responsible development of the Province's resource base is key to ensuring short-, medium- and long-term investment in the Province. Over the past several years, the proportion of global investment in BC has held steady; however, it continues to decline in relative proportion to exploration investment in other jurisdictions in Canada⁵.

AME and its members respect the many and diverse rights and interests to Crown land in BC, and we support the wellbeing of our environment and the protection of its species for society's benefit. We further recognize the need to balance these objectives with those of local and Indigenous communities that benefit from mineral exploration – directly and indirectly.

When considered thoughtfully and with broad collective input, we believe that these objectives do not have to represent an inescapable trade-off. The Agreement, when suitably adjusted and implemented, provides the path forward.

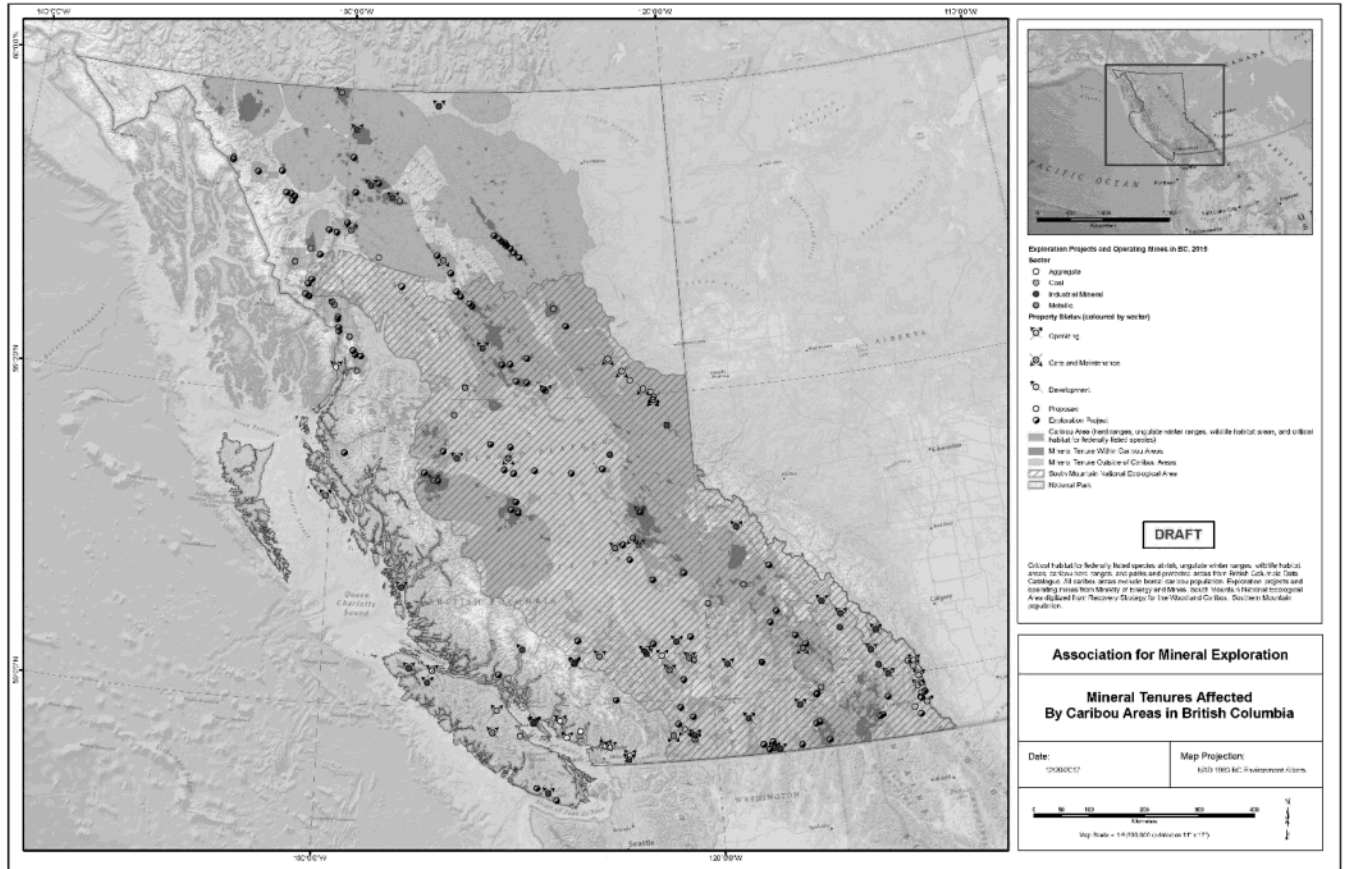
AME appreciates the opportunity to share the perspectives of BC's mineral explorers and developers in response to the Draft SARA Section 11 Conservation Agreement for the Conservation of Southern Mountain Caribou – Central Group. We understand ECCC will hear many opinions, perspectives and concepts that will require careful consideration and balancing of interests in moving forward with the Agreement to support the recovery of the Central Group of southern mountain caribou in British Columbia. As an association that advocates for mineral exploration and development, AME is steadfast in its position that resource management and use must always be conducted in a responsible manner that benefits all Canadians.

We remain available to the Government of Canada and the Province of British Columbia to discuss potential changes that could optimize the efficiency and effectiveness of the Agreement, and caribou recovery in British Columbia.

⁵ British Columbia Mineral and Coal Exploration Survey 2016 Report. p.7

APPENDIX I

EXHIBIT A: MINERAL TENURE WITHIN EXISTING PROVINCIALLY DESIGNATED CARIBOU HABITAT AND MANAGEMENT AREAS (DRAFT)



APPENDIX II

BC MINERALS AND THE SHIFT TOWARD A LOW CARBON ECONOMY

Society is becoming increasingly dependent on minerals and metals as we shift our dependency away from hydrocarbons and toward a greener economy that will include a greater mix of alternative and renewable energy sources. Minerals and metals are known resources that are needed to support this shift. Copper is expected to be in heavy demand arising simply from the manufacture of electric cars. Zinc is also projected to see a growth in demand.⁶ While these demand projections are largely driven by consumer-based preferences, we also foresee a notable increase in demand for alternative energy sources from industrial users – further impacting the global demand for these base metals and minerals. Recent undertakings by American automakers to fully convert their manufacturing plants to renewable energy are leading indicators of this trend⁷.

Through high-tech and low-impact geoscience, modern exploration techniques and the implementation of world-class clean-tech innovations in mining, members of AME discover the rare mineral, metal and steel-making coal deposits that may be mined for the basic materials that we all use daily, and will continue to increasingly use into the future.

Despite the depth of our current understanding of the existing geology and mineral potential of BC, we cannot predict or foresee the emergence of newly discovered minerals, the emergence of market demand for previously unknown or unvalued minerals, or the impacts that geopolitical shifts may have on the demand for known and unknown minerals that are present in BC.

Continued support of geoscientific research will support our understanding of our asset base, both within and outside of caribou habitat areas. Furthermore, responsible exploration of these resources will allow us to better delineate and optimize the development of these resources, while still being mindful of the need to support the recovery of southern mountain caribou in the Province.

The lengthy exploration stage of mineral development is not contrary to caribou recovery and habitat protection objectives. Diligent and low impact early stage exploration efforts could support the viability of BC's place in the global marketplace, while also minimizing impacts to caribou habitat areas.

The reclassification of BC's mineral rich land base may result in unnecessarily prohibiting the delineation and early stage exploration of BC's assets, which could have long term adverse impacts on the ability to attract capital to the mineral exploration sector, and for the Province and its citizens to capitalize on future economic opportunities.

As a politically stable and socially responsible location to invest, BC is well positioned to capture these known and unanticipated future opportunities. The results of the recently released World Risk Report demonstrated overwhelmingly that Canada, and notably British Columbia, is the safest place to invest resources and capital in exploration and mining projects. It further notes that social license and environmental management are the biggest operating risks globally.⁸ The ability of Canada and British Columbia to remain responsive to the trends and innovations supporting our low carbon future will enable us to set our place as a supplier of responsibly sourced materials to meet the needs of the global economy.

⁶ <http://www.resourceworks.com/crude-oil>

⁷ http://www.cleveland.com/business/index.ssf/2017/09/general_motors_going_100_perce.html

⁸ [World Risk Report 2017 Edition](#). Featuring MineHuthe Ratings. Mining Journal. p. 4, p. 23

APPENDIX III

STATE OF THE MINERAL EXPLORATION INDUSTRY IN BC

Mineral exploration is the foundation of the mining sector. Without exploration, there would be no mineral deposits discovered, and thus no mining. Exploration projects currently underway in BC are heavily weighted toward early stage exploration, which suggests that the sector's lifecycle is once again at its beginning phase⁹.

Generally, it is estimated that 1 out of every 10,000 early stage exploration projects will reach the advanced development phase. Each exploration program creates value to British Columbians through community and regional economic development, and by increasing the geological knowledge of a region.

There are currently six mineral and coal projects in the environmental assessment process in BC. These projects represent billions of dollars in potential capital investment into BC and Canada's economy. A further 13 projects are in the pre-application (scoping) stage.

The mines currently in production in BC, and those in the assessment process, are a direct result of successful discoveries made through prospecting and early stage exploration work conducted in the past, much of it decades ago. On average, a prospect will reach development stage between 15 and 20 years after discovery. In many cases, this process takes years longer, as illustrated below.

From Concept to Market – Notable BC Mining Project Timelines

Producing Mine	1890s	1900s	1910s	1920s	1930s	1940s	1950s	1960s	1970s	1980s	1990s	2000s	2010s
Highland Valley Copper							1955	1963					
Red Chris							1956				1995*	2004	2015
Mount Milligan					1937				1972	1987	1991*	2006	2013
Brucejack								1960			1991		2017
Afton/New Afton	1897						1952	1964	1977-1991			2000	2012

	Early-stage exploration
	Advanced exploration
	Enters environmental assessment
	Production
*	Project later withdrawn, resubmitted and approved

Source: MINFILE March 14, 2017

British Columbia, just like the rest of Canada, operates in a highly competitive, open trade environment. Mineral explorers and developers are price-takers, not price-makers, and are therefore subject to the basic fundamentals of global supply and demand. Despite very prudent fiscal restraint and cost-cutting measures, the industry recently weathered one of the most extreme and sustained downturns in history – resulting in bankruptcies, layoffs and cancelled or delayed projects.

Many members of AME are still struggling to remain financially viable during these difficult times, regardless of the recent market price increases for some base and precious metals and steel-making coal. While there is some confidence returning to the industry, there remains a high degree of uncertainty with respect to the depth and substance of the current price increases. Junior companies, which largely depend on equity markets to finance exploration activities, continue to struggle to raise capital, particularly for early stage exploration. With 87% of

⁹ British Columbia Mineral and Coal Exploration Survey 2016 Report. p.12

the early stage exploration in BC being undertaken by junior, publicly traded small-cap companies ¹⁰, access to global capital is of increasing importance to move projects toward advanced exploration stages, and then to development.

Mineral exploration expenditures in BC declined in 2016 for the fourth consecutive year, and were now 70% lower than the high of \$681 million in 2012. Similar effects are being seen globally, with overall financing for the industry dropping by almost 40% between 2007 and 2015, with financing for exploration falling over 90% in the same period. Canada attracted the single-largest share of total global mineral exploration budgets in 2016, but conceded first place to Australia in 2015. Despite these factors, British Columbia attracted almost 15% of all exploration dollars spent in Canada in 2016, but faces challenges in augmenting the inflow of capital into the Province. ¹¹

Crucially, this signals the potential of an imminent gap in the supply of upcoming projects that will replace BC's aging mine inventory. This could have significant impacts on the sector, commodity markets and the communities across BC that rely on the sector for their wellbeing.

¹⁰ British Columbia Mineral and Coal Exploration Survey 2016 Report. p.8

¹¹ British Columbia Mineral and Coal Exploration Survey 2016 Report. p.6