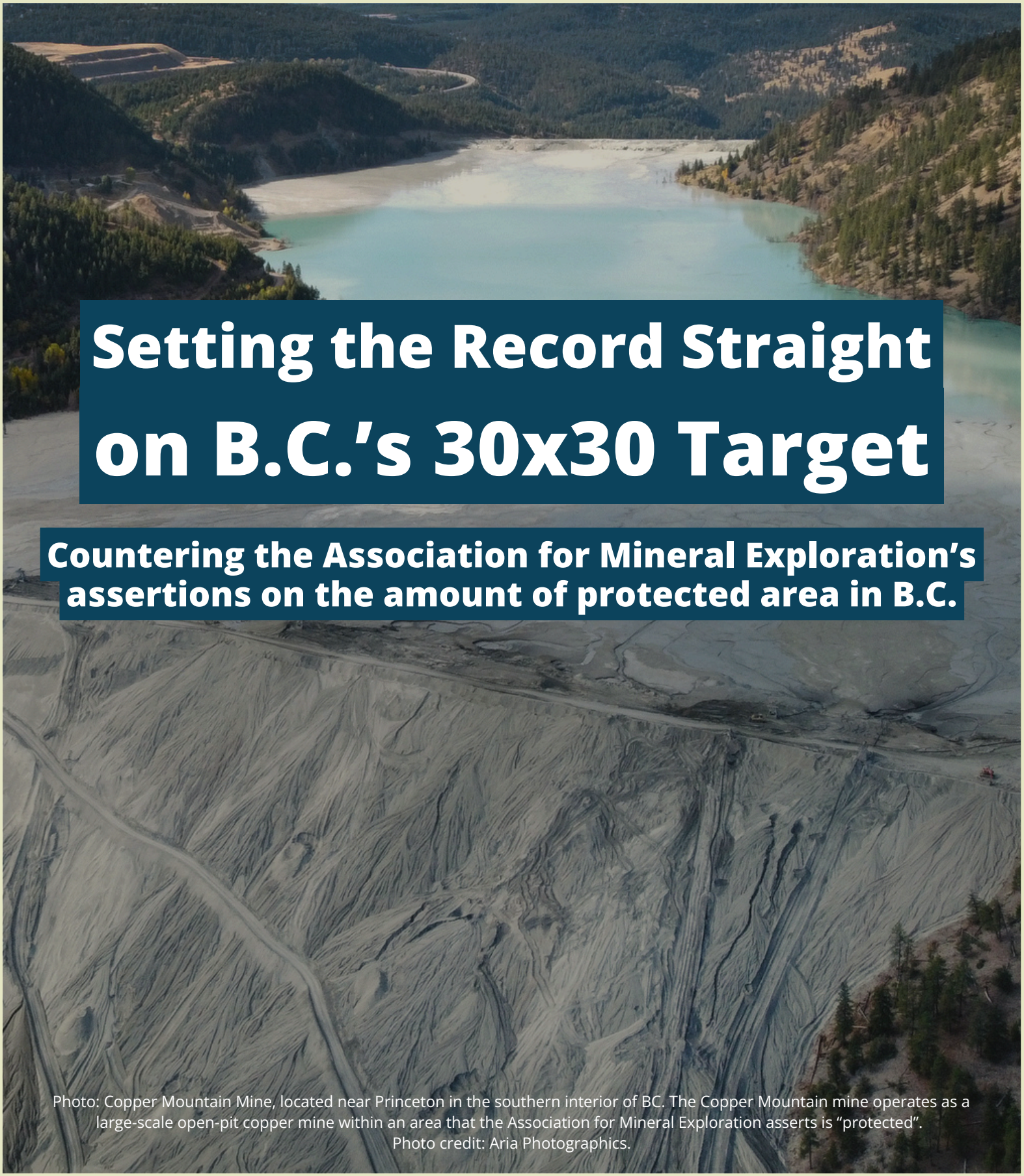


Setting the Record Straight on B.C.'s 30x30 Target

Countering the Association for Mineral Exploration's assertions on the amount of protected area in B.C.

Photo: Copper Mountain Mine, located near Princeton in the southern interior of BC. The Copper Mountain mine operates as a large-scale open-pit copper mine within an area that the Association for Mineral Exploration asserts is "protected". Photo credit: Aria Photographics.

SkeenaWild Conservation Trust

BC Mining Law Reform

Northern Confluence

CPAWS
Canadian Parks and Wilderness Society
British Columbia Chapter

Introduction

B.C.'s 30x30 Commitment and OECMs

British Columbia has committed to protecting 30% of its lands and waters by 2030. This target is part of Canada's national conservation goals and aligns with international agreements to halt biodiversity loss.[1] To date, approximately 15.9% of B.C.'s lands and waters are protected through parks and legally designated protected areas.[2] Other Effective Area-Based Conservation Measures (OECMs) are areas outside formal protected-area designations that deliver effective, long-term conservation, whether or not biodiversity conservation is the area's primary management objective.[3] OECMs can count toward B.C.'s 30x30 commitment if they meet several strict criteria outlined in the Pathway to Canada Target 1 Decision Support Tool which states: **OECMs must have clearly defined borders, provide the ability to prevent, control, and/or manage activities that are incompatible with biodiversity conservation, be long-term in nature, be effective year-round, and deliver demonstrated in-situ biodiversity conservation.[4]**

> *"Due to their typically negative impacts on the in-situ conservation of biodiversity, industrial activities and environmentally damaging infrastructure are not compatible with Protected Areas or OECMs."*
>
> **Pathway to Canada Target 1: Decision Support Tool for the identification of Other Effective Area-Based Conservation Measures (OECMs). Government of Canada (2021). Pg 21.[4]**

Association for Mineral Exploration's Assertion

In December 2025, the Association for Mineral Exploration (AME) published a policy update asserting that B.C. has already exceeded its 30x30 target.[5] Using its own calculations, AME asserts that conservation categories it considers eligible as OECMs protect up to 36.3% of B.C.'s land base, and that once overlap with parks and protected areas is removed, the total area protected reaches up to 46.99%.[5] AME further argues that many of these conservation categories restrict economic activity and effectively prevent mineral exploration and mining.[5] AME's policy recommendation is that the Province should focus on counting existing OECMs rather than establishing new protected areas.[5]

Purpose of the Report

This report examines whether the areas AME claims are protected meet the Canadian and international criteria for OECMs, as outlined above. It presents independent mapping analysis conducted by SkeenaWild Conservation Trust, CPAWS-BC, Northern Confluence, and the BC Mining Law Reform Network. To conduct this analysis, we overlaid AME's asserted protected areas with data on active mining tenures, exploration and regional mine permits, and exploration and mine projects.

Our analysis reveals that many areas AME counts as protected remain open to active mineral exploration, mine development, and in some cases, full-scale mining operations. Areas where incompatible activities are permitted or reasonably expected to occur without effective mechanisms to prevent or manage their impacts are unlikely to satisfy the Effective Means criterion for a protected area or OECM: "The intended effect of the criterion is that activities that are incompatible with in-situ conservation of biodiversity do not occur and compatible activities [and their effects] are effectively managed" (pg. 10).[4]

Our findings are based on an understanding that mining poses serious, significant threats to biodiversity,[6,7,8] and permitting mineral exploration preserves and advances a legal and practical pathway toward extraction, even though future production remains subject to additional approvals.[9]

> *"A site does not meet the criteria [for a Protected Area or OECM] if an incompatible activity could be reasonably expected to occur in the future and governing authorities are not required to either prevent it or make it compatible."*
>
> **Pathway to Canada Target 1: Decision Support Tool for the identification of Other Effective Area-Based Conservation Measures (OECMs). Government of Canada (2021). Pg 12.[4]**

Other OECM Accounting Issues in BC

This report did not examine other industrial uses, such as forestry and road building. According to a 2022 CPAWS-BC and Ecojustice report, much of the area B.C. reported to the Canadian Protected and Conserved Areas Database as OECMs do not meet the criteria outlined in the Decision Support Tool.[10] For B.C. to meet its 30x30 commitment in a way that supports biodiversity as intended, all OECMs must be transparently assessed and brought into adherence with the Canadian definition.

Key Findings*

Mining Projects in AME-Asserted Protected Areas

27% of mining projects listed by the B.C. Geological Survey in 2025 are located within areas AME says should count as protected.
These include:

- *8 operating mines (including Copper Mountain, see case study pg 13)*
- *8 proposed mines (including Kemess Underground, see case study pg 9)*
- *82 unique exploration projects, some of which have since entered the Environmental Assessment process (e.g. Baptiste Nickel, which was accelerated as a priority project by the B.C. Critical Minerals Office)*

Active Mineral Tenures, Exploration Permits & Regional Mine Permits

Approximately 24% of all active mineral tenures in B.C. are located inside areas AME asserts are protected. Additionally, 18% of all active exploration and regional mine permits overlap with these asserted conservation areas. Active mineral tenures confer a legal right of entry and exploration, with the statutory ability to advance toward mineral production (e.g., through lease or production permitting), and are not merely expressions of interest.[9]

Ungulate Winter Ranges

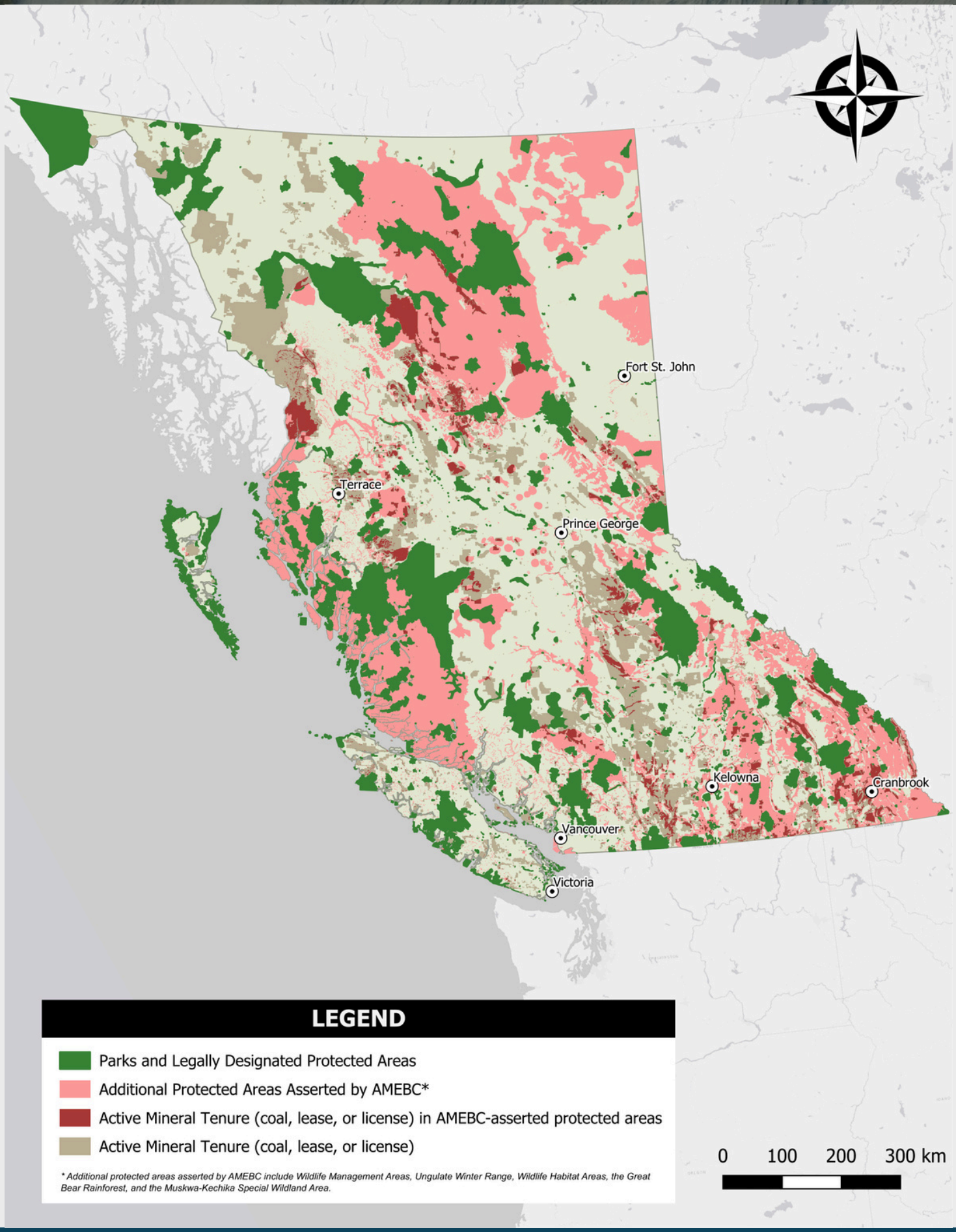
AME's protected area assertions rely heavily on the inclusion of Ungulate Winter Ranges. However, in 2025, Ungulate Winter Ranges in B.C. contained at least 6 operating mines, 5 proposed mines, and 61 exploration projects. These areas provide site-specific management directions for wildlife, but do not prohibit industrial activities, including mining and forestry.[10]

Impacts of Other Industrial Uses

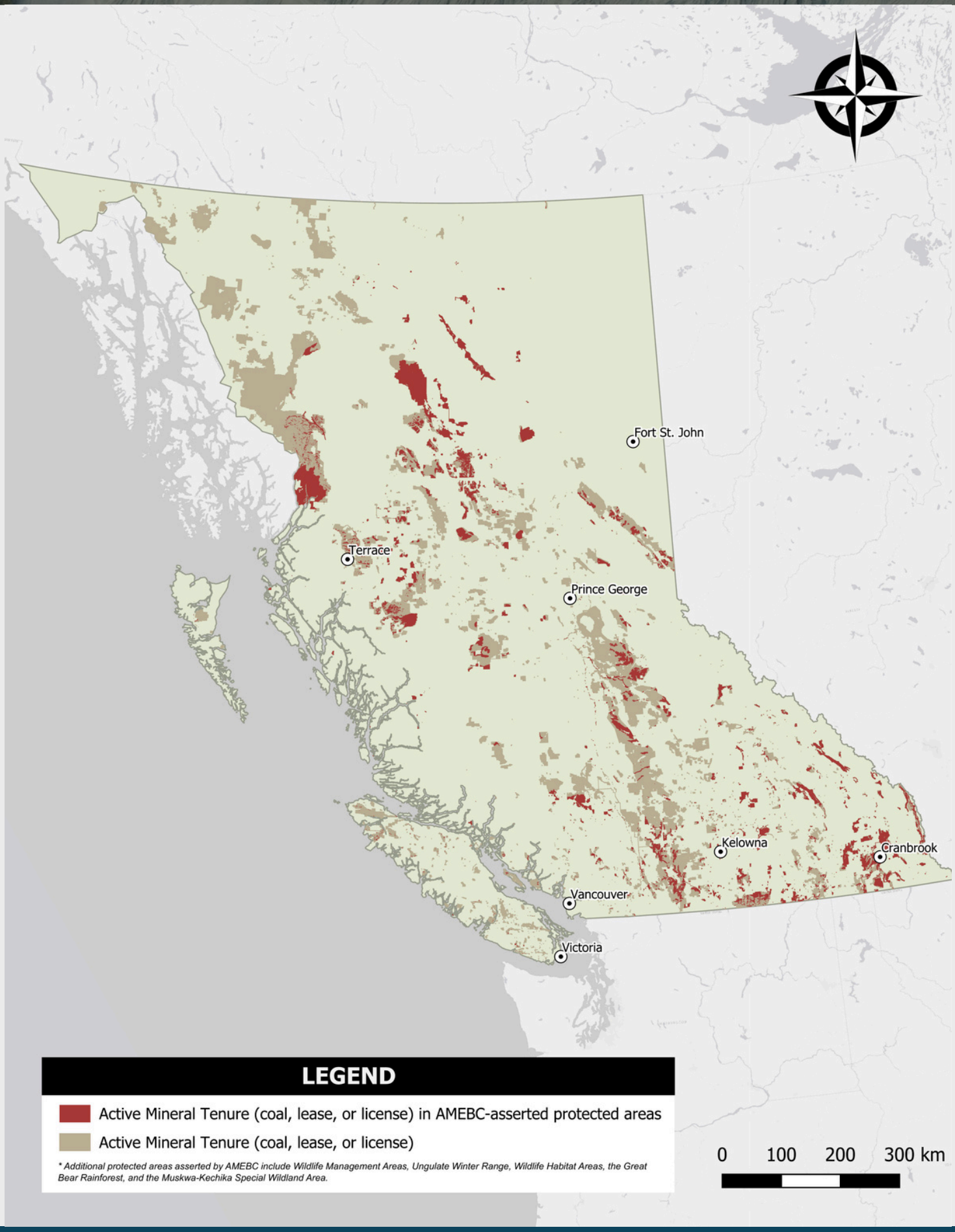
The mapping analysis focused specifically on mineral exploration and mining. However, other industrial uses, including logging and road-building, are also permitted in many of AME's mapped areas. Unless these areas are assessed on a site-by-site basis and are found to meet all criteria, they cannot be considered OECMs.[4] These additional industrial overlaps further undermine AME's claim that B.C.'s existing measures are sufficient as protected areas.

*Provided by Eclipse Geomatics Ltd. The analysis overlaid AME's asserted protected areas, including Wildlife Management Areas, Ungulate Winter Ranges, Wildlife Habitat Areas, the Great Bear Rainforest, and the Muskwa-Kechika Special Wildland Area, with the B.C. Geological Survey's 2025 inventory of mining projects, as well as mineral tenures (tenures, leases, and licenses for mineral, coal, and placer mining) and Notice of Works (i.e., exploration and regional mine permits). Only tenures and Notice of Works active after December 31, 2025, were included.

Map 1: Full Province Overview



Map 2: Mineral Tenures Only



Mapping Analysis

Analysis: Full Province Overview and Mineral Tenures

The provincial overview map (Map 1) illustrates the scale of the gap between AME's claims and the reality on the ground. While AME asserts that nearly 47% of British Columbia should be considered protected, the mapping analysis shows extensive overlap between their claimed protected areas and active industrial activity. The pink areas on the map represent lands AME counts toward conservation targets; however, throughout these areas, dark red patches indicate overlapping active mineral tenures.

The mineral tenures map (Map 2) strips away other designations to show the extent of exploration activity alone. Active tenures cluster heavily in the southeast, north-central, and northwest regions of the province, precisely where AME's OECM assertions are most extensive. This pattern is not coincidental: these regions contain significant mineral deposits and have seen sustained exploration and development activity.

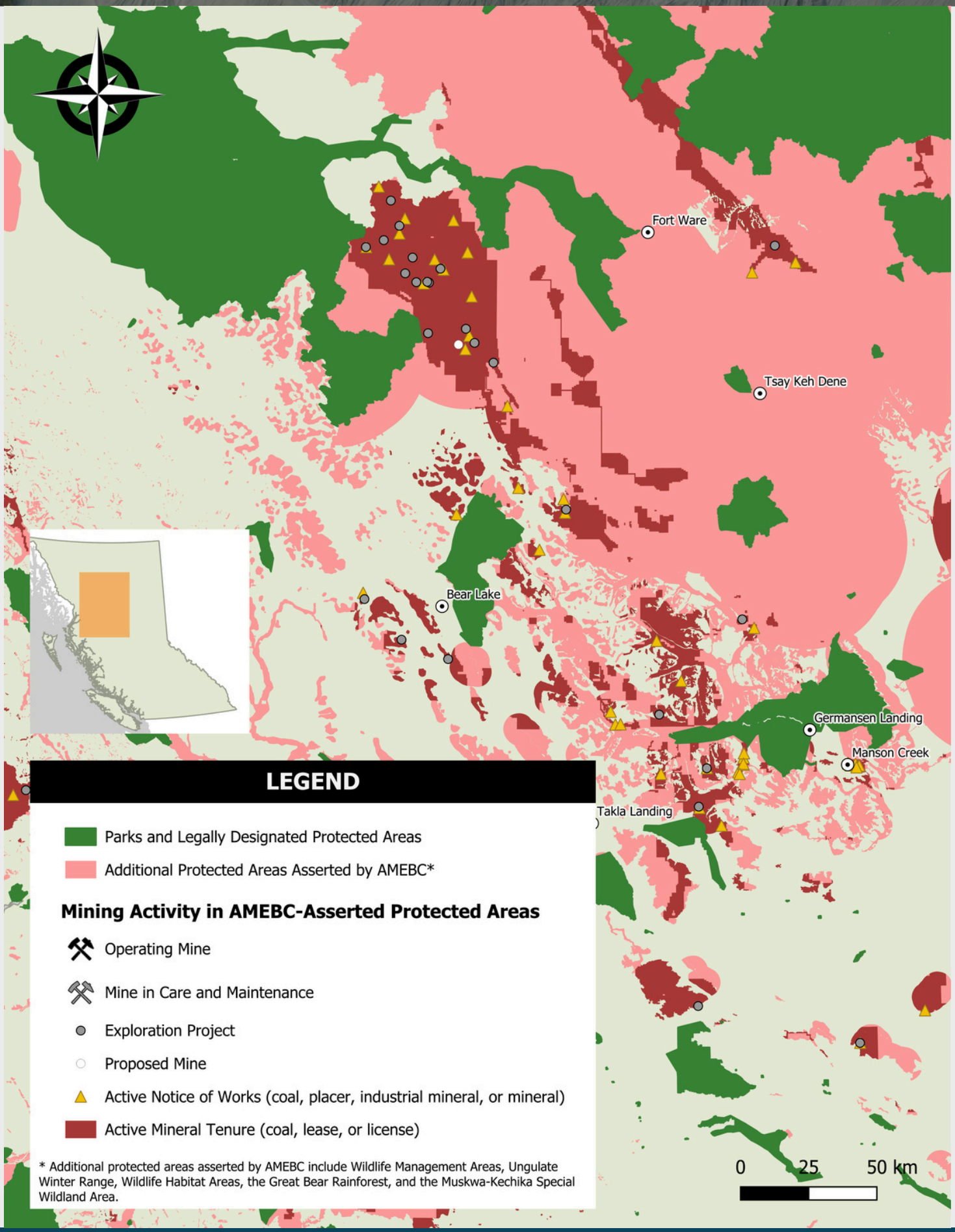
Why Mineral Tenures Matter

Under the BC *Mineral Tenure Act*, a free miner may enter mineral lands to explore, and a recorded holder may use, enter and occupy a claim or lease for exploration, development or production, subject to any required Mines Act permit.[9] A recorded holder may also apply to convert a mineral claim into a mining lease.[9] Mineral tenure is therefore not merely an expression of interest: it creates legal rights and a statutory pathway from exploration toward production.

Some may argue that most mineral exploration sites fail to become mines, and Natural Resources Canada acknowledges only a small proportion of mineral deposits ultimately advance to production.[11] But the Decision Support Tool asks whether an incompatible activity "could be reasonably expected to occur in the future" and whether governing authorities are required to prevent it or make it compatible.[4]

In these AME-asserted areas, ordinary mineral tenure and permitting pathways remain available, and the mapped "OECM" designation itself does not necessarily require the Province to prevent progression from exploration to development where biodiversity conflicts arise.[4,9] Given that exploration and future development remain legally available, the area is highly unlikely to satisfy the Effective Means test to be considered an OECM.

Map 3: Spotlight on North-Central B.C.

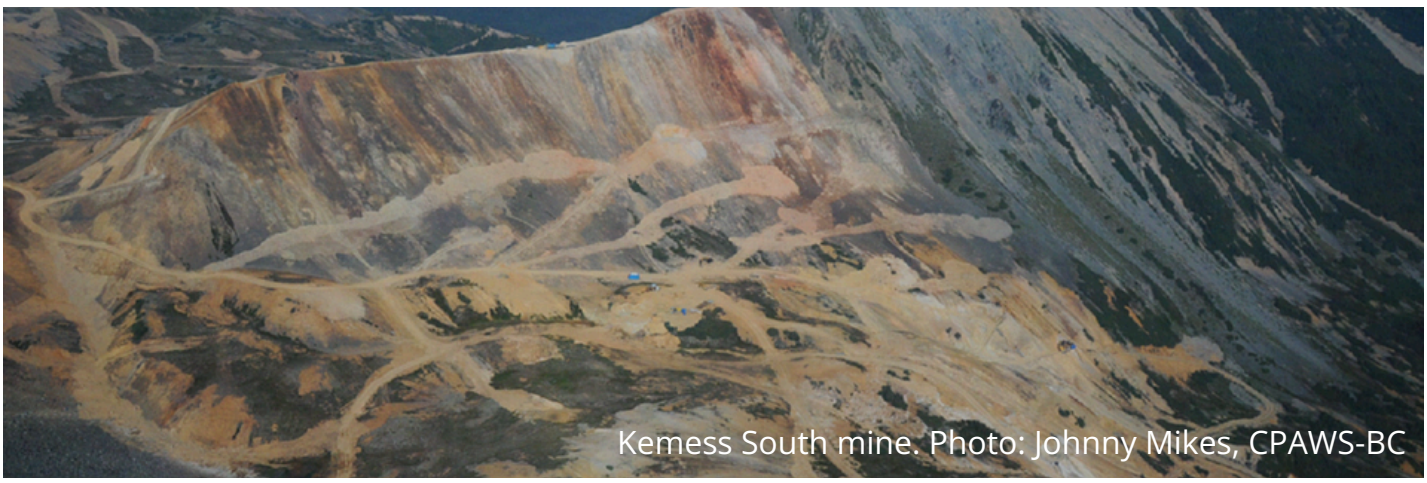


Analysis: Spotlight on North-Central B.C.

North-central B.C. presents a striking example of the disconnect between AME's claims and actual land use. In this region, which includes portions of the Muskwa-Kechika Special Wildland Area and extensive Ungulate Winter Ranges, Map 3 reveals a landscape of active mineral tenures, exploration projects, and proposed mine developments occurring within areas AME asserts should count as protected. The concentration of yellow triangles (active Notice of Works) and grey dots (exploration projects) within the pink-shaded areas demonstrates that mineral exploration is actively underway in lands AME claims are conserved. The Toodoggone Mining District, located in this region of AME's asserted protected areas, hosts multiple exploration projects and proposed mines.

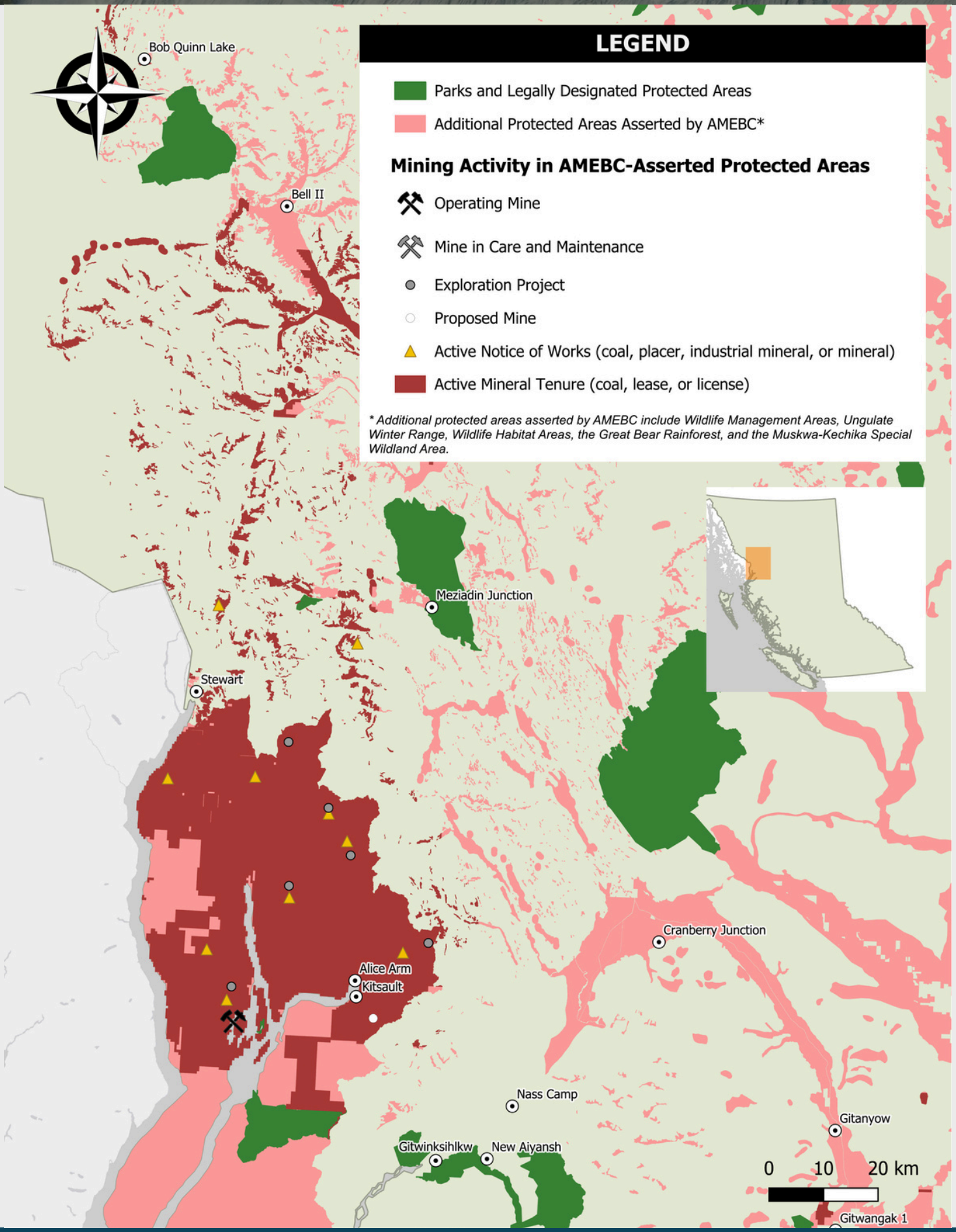
Case Study: Kemess Underground

The Kemess Underground project demonstrates the contradiction at the heart of AME's assertions. Located 6 km north of the past-producing Kemess South mine, the project sits within a landscape of Ungulate Winter Range (UWR) habitat, one of the OECM categories AME relies upon to reach its 47% figure.[5] Since receiving its environmental assessment certificate in 2017 for an underground copper-gold mine,[12] the project has been substantially advanced by owner Centerra Gold. In January 2026, Centerra released a Preliminary Economic Assessment describing an integrated open pit and underground operation with a 15-year mine life, with first production targeted for late 2031.[13] The site overlaps with high-quality caribou winter habitat, as well as habitat for grizzly bear, moose, and multiple species at risk.[14] The project's overlap with high-quality wildlife habitat, together with its advancement since approval, reinforces the concern that this is not an OECM: there is no effective conservation mechanism here that prevents mining activity from negatively impacting biodiversity conservation.



Kemess South mine. Photo: Johnny Mikes, CPAWS-BC

Map 4: Spotlight on Northwest B.C.



Analysis: Spotlight on Northwest B.C.

Northwest B.C. is an ecologically significant region in the province, encompassing portions of the Great Bear Rainforest and critical salmon watersheds. AME deems large swaths of this region as protected, particularly through Wildlife Habitat Areas and the Great Bear Rainforest designation. However, Map 4 reveals extensive mining activity overlaps.

Stretching from Alice Arm and the Nass Wildlife Area, along the coastal mountains, and into the interior, these areas provide critical habitat for grizzly bears, mountain goats, and all five species of Pacific salmon. The map shows active mineral tenures, exploration projects, the Anyox industrial mine site, and the proposed Kitsault mine.

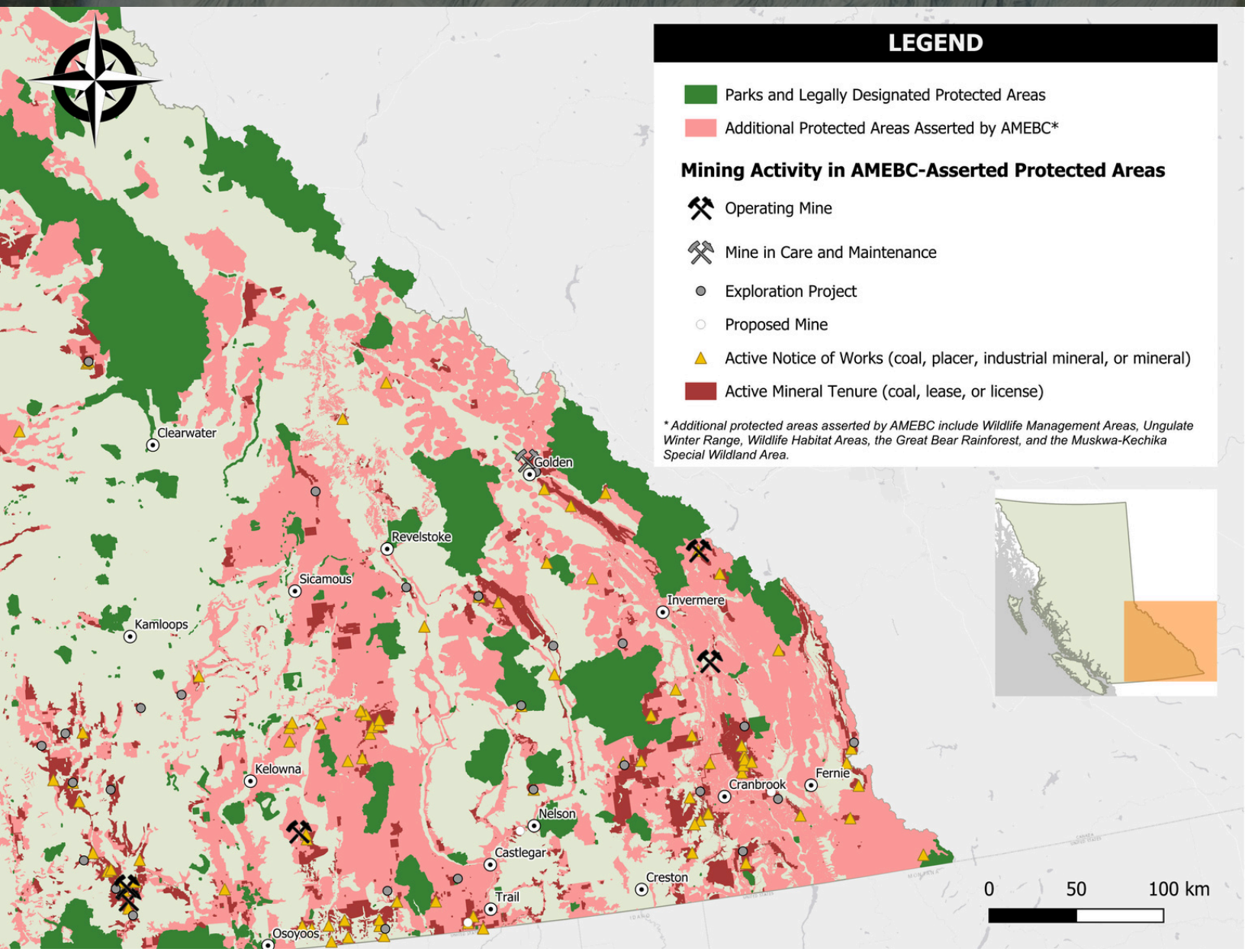
Case Study: Kitsault mine

The proposed Kitsault molybdenum mine, located in the heart of AME's asserted protected areas in the northwest, stands as a clear example of why these lands cannot credibly be counted toward conservation targets. When the mine last operated (1967-1972 and briefly in 1981), it released contaminated tailings waste directly into Alice Arm.[15] Its owner, New Moly, is actively seeking investment to move towards renewed operations.[16] Proposed mine infrastructure in the 2011 environmental assessment will physically alter the Clary Creek Watershed, reducing fish spawning areas, decreasing dissolved oxygen, and raising water temperatures.[17]

Under Canadian criteria for OECMs, protection mechanisms are "intended to be in place for the long term and not easily reversed" (pg 12).[4] A proposed mine site with existing infrastructure, environmental approvals history, reserves, and an active proponent is difficult to characterize as long-term conserved.

> *"Construction and operation of the proposed Project would result in the harmful alteration, disruption, or destruction (HADD) of fish habitat in the Clary Creek Watershed... residual impacts to fish habitat in the headwater tributaries... are unavoidable."*
>
> **Kitsault Mine Project Environmental Assessment. Avanti Mining Inc (2011). Pg 21-135[17]**

Map 5: Spotlight on Southeast B.C.



Analysis: Spotlight on Southeast B.C.

Southeast B.C. contains some of the province's most important wildlife habitat, including critical winter range for mountain caribou, elk, and mule deer, as well as significant populations of grizzly bears. AME argues that much of this region is protected through Ungulate Winter Ranges and Wildlife Habitat Areas. Yet Map 5 shows a dense concentration of active mineral tenures and exploration projects throughout these areas. Containing five operating mines, one mine in care and maintenance, and four proposed mines that overlap with AME's asserted protected areas, Southeast B.C. is the region with the greatest concentration of mining activity within AME's asserted protected areas.

Case Study: Copper Mountain mine

The Copper Mountain mine, located near Princeton in the southern interior, operates as a large-scale open-pit copper mine within an area that falls under AME's claimed protected designations. Located along the Similkameen River, which supports sockeye salmon, steelhead, and threatened Chinook salmon,[18] the Copper Mountain mineral claims cover approximately 6,263 hectares (15,477 acres) of land.[19] The mine was recently approved, without an environmental assessment, for an expansion that will further increase its operational footprint and raise its tailings dam to approximately 255 metres, placing it among the tallest tailings facilities in Canada if constructed as described.[20]

> *"Copper Mountain has faced repeated fines for polluting nearby waterways, including illegal discharges into the Similkameen River."*
>
> **Dirty Dozen 2025: B.C.'s top polluting and risky mines. British Columbia Mining Law Reform. (2025). Pg 11[21]**

The presence of an active open-pit mine with a large-scale waste facility within lands AME counts as protected exposes fundamental flaws in their methodology. Copper Mountain is not an edge case or an anomaly. It is one of eight operating mines identified by this analysis within areas AME asserts should count toward B.C.'s 30x30 target. Each operating mine is strong evidence that the land designations AME relies on are not functioning as effective conservation mechanisms for those sites. These are not areas where in-situ biodiversity conservation is a secondary benefit of management; they are areas where industrial extraction is the one and only activity.

Copper Mountain mine. Photo: Aria Photographics

Conclusion

AME's assertion that nearly 47% of British Columbia is already protected does not hold up to scrutiny. The independent mapping analysis presented in this report demonstrates that many areas AME counts as OECMs remain open to mining and other industrial activities. Areas that do not meet the criteria under the Decision Support Tool, including areas where incompatible activities are not effectively prevented or managed, should not be counted toward the 30x30 target. The gap between AME's assertions and on-the-ground realities represents a fundamental mischaracterization of the province's conservation status, and risks undermining B.C.'s ability to meet its 30x30 commitment and effectively protect wildlife, watersheds, and ecosystem health.

Recommendations

Evidence-based decision-making: Conservation policy must be grounded in verifiable data and on-the-ground assessment, not industry assertions. The Province should maintain transparent, publicly accessible reporting on the status of protected and conserved areas.

Clear and enforceable definitions: B.C. must apply Canadian and international standards rigorously when accounting for OECMs. Areas that do not meet the criteria under the Decision Support Tool, and are therefore incompatible with biodiversity conservation, should not be counted toward the 30x30 target.

Strong legal conservation measures: Meeting the 30x30 target will require nearly doubling the area of the province under meaningful protection.[2] This means establishing new protected areas and strengthening existing designations through legally enforceable mechanisms.

Respect for Indigenous rights: All conservation and land use planning must uphold the duty to consult and accommodate Indigenous nations, formally recognize Indigenous-led conservation initiatives, and respect treaty and inherent rights.

Alignment between commitments and action: B.C. has made an important commitment to protect 30% of lands and waters by 2030. Achieving this goal will require political will, adequate funding, and a commitment to conservation measures that actually protect ecosystems on the ground — not just on paper.

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