

MINERAL CLAIMS CONSULTATION FRAMEWORK— 6 MONTH REVIEW

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INTRODUCTION

The *Mineral Tenure Act* governs the acquisition and management of mineral and placer tenures in British Columbia. In the past, Free Miner Certificate holders were able to register claims automatically through the Mineral Titles Online (MTO) system, without prior consultation with First Nations.

In September 2023, the B.C. Supreme Court ruled that this process did not fulfill the Province’s duty to consult under Section 35 of the *Constitution Act, 1982*. The ruling acknowledged that granting claims—along with the allowable activities on a claim that do not require a *Mines Act* permit—can adversely affect First Nations’ rights and title. The Court provided 18 months for the province implement a consultation process.

To comply with the Court’s ruling, the Ministry of Mining and Critical Minerals (the Ministry) developed the Mineral Claims Consultation Framework (MCCF), which took effect on March 26, 2025. The MCCF replaces automatic claim registration with an application-based process on MTO that incorporates consultation with First Nations, prior to a mineral claim being registered.

At the outset of MCCF implementation, the Ministry committed to a 6-month review process to ensure continuous improvement and to assess program delivery against concerns raised by industry and First Nations. This report summarizes the findings, lessons learned and next steps based on feedback and the ministry’s own review of program implementation.

OVERVIEW OF THE MCCF

Under the MCCF, the Ministry collates claim applications and initiates monthly consultation packages, distributing “batches” of claim applications to First Nations. Thirty days are provided for a response, and where additional time is required, the Statutory Decision Maker (SDM) may grant 15-day extensions.

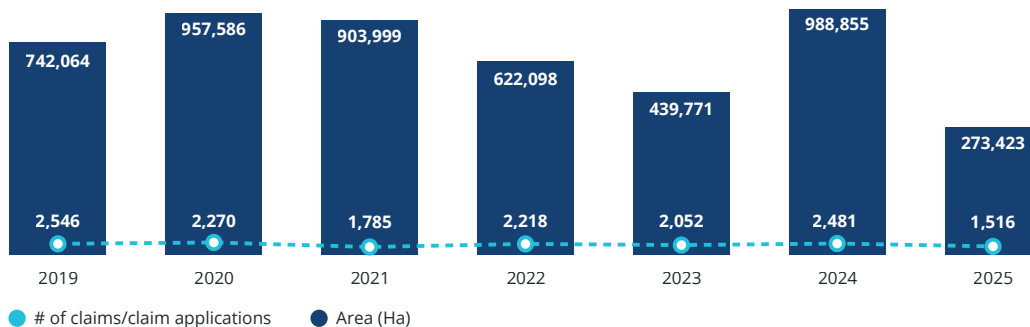
Operationalizing the consultation process for mineral claim applications is complex. In some areas of the province, a single application can overlap with as many as 15 First Nations’ territories, all of whom are consulted. Applications advance to the decision stage after the Ministry has addressed the responses or concerns raised by all affected First Nations.

As part of the decision-making process, the SDM reviews all correspondence and concerns submitted by the First Nations. Once the decision is recorded in MTO system, notifications are sent to both the applicant and the affected First Nations.

MCCF Data

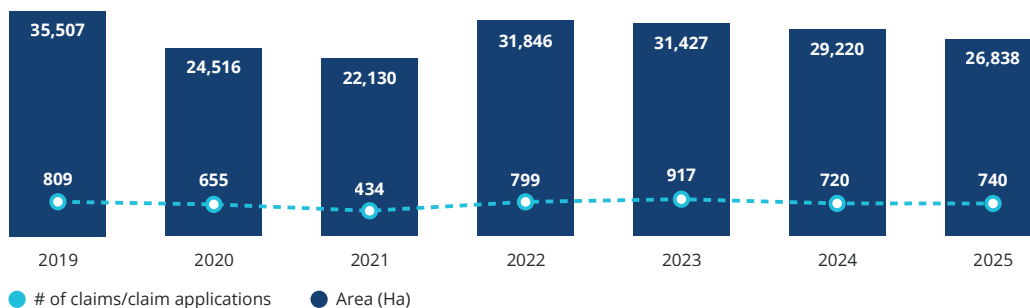
Between March 25th and September 30th, 2025, the Ministry received applications for or registered 1,516 mineral claim applications, a 29% decline compared to the seven-year average of 2,124. The total area applied for or registered has also decreased, with 273,423 hectares in 2025, a 61% decline compared to the seven-year average of 703,995 hectares.

Mineral Claim Acquisition/Applications between March 25 and September 30 (2019–2025)



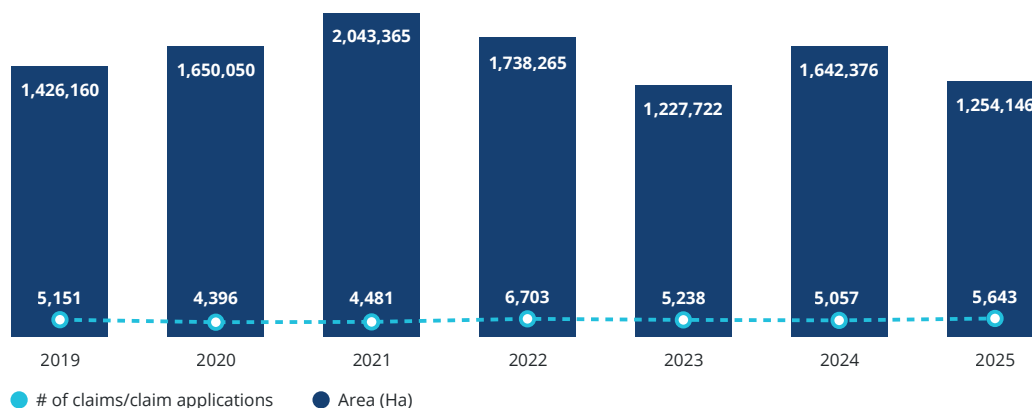
Placer claim acquisition did not experience the same level of decline in number of claims or hectares as mineral claims. Between March 25th and September 30th, 2025, the Ministry recorded an increase in placer claim acquisitions, receiving or registering a total of 740 claims, compared to the seven-year average of 724. However, the total area covered by these claims has decreased, with 26,838 hectares in 2025, compared to the seven-year average of 28,769 hectares.

Placer Claim Acquisition/Applications between March 25 and September 30 (2019–2025)



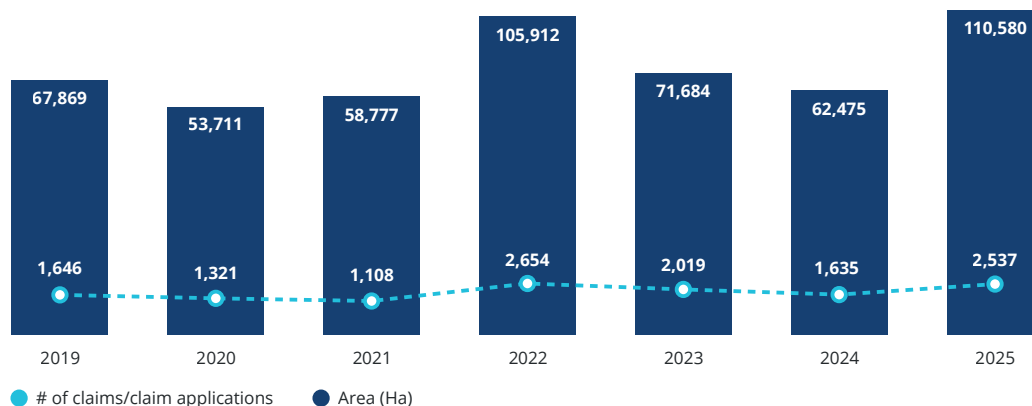
Comparing annual trends, the Ministry received or registered 5,643 mineral claim applications in 2025, an 8% increase compared to the seven-year average of 5,238. However, the total area applied for or registered decreased by 20%, with 1,254,146 hectares applied for or registered in 2025, compared to the seven-year average of 1,568,869 hectares.

Yearly Mineral Claim Acquisition/Application Counts and Areas



The Ministry recorded a notable increase (32%) in annual placer claim acquisitions, receiving or registering a total of 2,537 claims, compared to the seven-year average of 1,846. The total area covered by these claims also increased by 37%, reaching 110,580 hectares, compared to the seven-year average of 75,858 hectares.

Yearly Placer Claim Acquisition/Application Counts and Areas



Between March 25th and August 1, 2025, the Ministry received 1,529 claim applications and processed 954 applications in MTO. The average processing time during this period was 127 days. As part of this process, the Ministry undertook 5,605 individual consultations with First Nations. These consultations placed significant demand on some First Nations, with certain Nations receiving more than 300 applications in that period. The high-volume applications and consultations highlight the importance of evaluating the MCCF's implementation while working with industry and First Nations to identify challenges and opportunities for improvement.

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SURVEY RESULTS SUMMARY

The Ministry remains dedicated to fostering an inclusive and respectful environment throughout all engagement processes, upholding a clear commitment to anti-racism. In line with this commitment, disrespectful or racist remarks have been removed from the survey results and summary.

Survey Administration

The survey was administered by the Ministry of Citizen Services on behalf of the Ministry.

On October 26, 2025, the Ministry sent surveys to all claim applicants (774) and 324 First Nation representatives, outlining questions regarding the MCCF process, timelines, and Ministry communication. The survey closed on November 26, 2025, and over that time the Ministry received responses from 152 applicants and 18 First Nation representatives.

The results of the surveys can be found in Appendix 1 and 2, respectively.

The Ministry also received and incorporated feedback shared during consultation with First Nations, from claim applicants directly and from the Association for Mineral Exploration, following a series of townhalls with their members. This information has been used to inform learnings and actions set out in the report.

Claim Applicant Survey Summary

The majority of respondents (88%) agreed that the steps were clear in MTO when applying for a claim. Several respondents noted in comments that Ministry staff were approachable and responsive to their inquiries and acknowledged that the MCCF is a new program that will take time to refine.

The survey results also underscore four overall areas that need improvement and offer opportunities to strengthen the program, as summarized below:

1. APPLICATION DELAYS

The most common concern raised by respondents was the delay in application approvals, with some respondents experiencing delays beyond three months. Respondents also noted that winter conditions restrict their field work, and that this is particularly impactful in northern B.C. Only 17% of respondents felt the timelines met their expectations, while 73% of applicants indicated that uncertainty around approval timelines has had a negative impact on their business planning, making it difficult to schedule fieldwork and allocate resources.

Applicant quote: *“90 plus days is a very long time before any work can begin on the claim. If it is early summer when I applied, I would not get work done that year.”*

2. MINERAL TITLES ONLINE

Feedback on the MTO platform was generally positive with 88% of respondents agreeing that they could find the information needed to make an application, and 65% reporting general satisfaction with their experience using the system.

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Applicant quote: *“We were impressed with the simplicity of the MTO application process.”*

The payment system was a source of frustration for respondents who objected to paying fees prior to approval. Privacy concerns were also highlighted by a few respondents, who expressed concern that public visibility of pending applications could allow competitors to exploit claim locations. While applicants must be able to see the claim cells under review, the personal information disclosed publicly is limited to the applicant’s address.

3. PROCESS

Many respondents expressed uncertainty regarding the Ministry’s internal review process, including how long each step will take. Only 35% of respondents agreed that they received enough information about decisions made on their claims, while 47% disagreed.

Status updates regarding an application’s progress emerged as an area for improvement. Nearly half of respondents (44%) expressed dissatisfaction with the frequency and quality of status updates, noting extended periods without meaningful information about their application’s status. Many reported that the notifications are too generic and provide limited detail about the specific actions being taken or the stage of their application in the process.

Applicant quote: *“We are dissatisfied with the post-application process, specifically the Mineral Claim Consultation Framework MCCF process. We submitted our claim application over 4 months ago and to date have not received any updates on the status of our application within MCCF. The MCCF process takes too long and does not keep the applicant sufficiently informed as to the progress/status of their application.”*

4. GUIDANCE

Respondents expressed a desire for clearer Ministry guidance materials, including visual process maps and estimated timelines for each stage of the application. Furthermore, respondents requested regular status notifications or a real-time tracking system within MTO to better monitor their application status.

Applicant quote: *“I did not find the timelines for the consultation process were/are clearly laid out. The consultation process seems to occur in a black box, and as the proponent I felt like I was not aware of what consultation was taking place. To have meaningful dialogue it would be preferable to either have more update or be able to be part of the communication process. Even after the claims were approved, I did not find any summary of what consultation took place.”*

Suggested Improvements

To address concerns regarding timelines, respondents recommended establishing clear, enforceable timelines for claim approvals, including automatic follow-ups or status updates when timelines are exceeded.

In terms of communication and transparency, respondents requested that the Ministry provide real-time application tracking, monthly updates, and offer greater clarity on which First Nations are being consulted and how feedback informs decisions. Respondents also emphasized the need for materials related to the Ministry’s review process to inform applicants of each stage of the process.

Lastly, respondents called for upgrades to the MTO, including a clearer map legend, improved system performance to reduce freezing, and enhanced privacy protections. This feedback will inform the MTO Modernization work.

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Summary of First Nations Feedback

The First Nation survey received 18 responses. The Ministry also collected feedback on the MCCF during direct consultation with First Nations on claim applications and feedback received from the British Columbia Assembly of First Nations. This information has been considered in the summary of feedback presented below. Similar to results from applicant engagement, a number of themes and opportunities for improvement have emerged and are set out below.

1. PROCESS AND COMMUNICATION

First Nations reported that consultation with the Ministry felt transactional, lacked meaningful engagement, and provided insufficient information to assess impacts—only 22% agreed they had enough information. Many were frustrated by decision notifications arriving after approvals and dissatisfied with receiving claim applications. Respondents called for direct, two-way engagement and clear feedback mechanisms showing how input informs decisions.

Concerns were also raised about the lack of oversight in the MCCF process, with claims registered without verifying applicants' background or capacity. Additionally, respondents highlighted risks to archaeological sites. Permissions allowing hand-dug test pits and trenches without permits were identified as a particular concern.

First Nation respondent quote: *“Rather than provide an opportunity to properly engage, the Province is simply demonstrating its willingness to issue title “in bulk”. This only further underscores the deeply problematic nature of the Mineral Tenure Act as an enabler of undue cumulative effect impacts.”*

Respondents advocated for establishing consultation processes collaboratively through Government-to-Government (G2G) agreements, emphasizing the importance of co-developing protocols that reflect shared priorities. Some First Nations also requested that the Ministry pause all claim applications until the *Mineral Tenure Act* is modernized in alignment with the *Declaration on the Rights of Indigenous Peoples Act*.

2. CAPACITY AND ADMINISTRATIVE CHALLENGES

High volumes of claim applications and short timelines create significant capacity challenges, leaving Nations unable to conduct thorough reviews. Batch processing further limits access to site-specific information. Respondents (69%) emphasized that no additional capacity funding or staffing support has been provided. To address these issues, suggestions included linking tenure fees and rents to capacity funding and adjusting them to reflect workload and staffing needs.

First Nation respondent quote: *“For long term durability in the assessment and consultation process, Nations would also need capacity funding to develop policies, protocols, or implement software to manage consultation streams.”*

3. CLARITY OF CLAIM APPLICATION

Most respondents (84%) reported technical issues when reviewing applications, including incorrect attachments and missing shapefiles, which hinder timely reviews. Several also stressed the need for commodity information in applications to support thorough assessments.

4. ADDITIONAL CONSIDERATIONS

Several First Nations expressed objections to mineral and placer exploration within their territories, particularly where cumulative effects, risks to water quality, or impacts on fish habitat were identified. These concerns also related to the potential impacts on inherent rights and title, with many First Nations underscoring the importance of obtaining consent before proceeding with exploration activities. Many

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First Nations identified specific areas within their territories as unsuitable for any type of mining or exploration activity. While some of these locations are publicly known, such as those outlined in Indigenous Protected and Conserved Area declarations, others involve confidential information, including oral histories and cultural knowledge.

Suggested Improvements

Suggested improvements focused on enhancing communication and engagement, extending response timeframes, providing accessible options for conditional reserves, and increasing capacity funding tied to tenure fees. First Nations also emphasized the need for greater transparency through impact assessments and written responses to comments, as well as negotiating consultation processes under existing government-to-government agreements before applications move forward. Additionally, some First Nations requested a temporary pause to claim registration until the *Mineral Tenure Act* is modernized in alignment with the *Rights of Indigenous Peoples Act*.

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LESSONS LEARNED

Reflecting on the implementation of the MCCF program and the results of the surveys, feedback from First Nations during consultation, engagement at the Minerals South Conference, and AME Townhalls, the Ministry has identified findings and is making targeted improvements to better support both applicants and First Nations.

As a newly established program, applicants, First Nations, and Ministry staff have all had to navigate a period of adjustment, which is ongoing. The transition has been demanding. Initially, the Ministry set a target of processing applications within 90 to 120 days, and this remains the program's primary goal. However, over two-months of job action led to a substantial backlog of applications. While the Ministry has taken concrete steps to address these challenges, as outlined below, there will be an ongoing effort to clear the backlog. The Ministry is committed to returning to its intended processing timelines in 2026, ensuring greater efficiency and transparency for applicants.

Referral Process

The Ministry has adapted its referral initiation procedures to accommodate First Nations that prefer to receive referrals through a consultation portal. While this option was not available at the outset of the program, the Ministry now has system flexibility to send referral packages either directly to a First Nation or through the designated consultation portal.

Capacity

The Ministry is working to provide capacity funding to First Nations across the province to support the effort required to review and respond to claim applications. This capacity funding is being allocated using a sliding scale that corresponds to the volume of claim applications each First Nation received up to August 29, 2025. This approach ensures that funding is distributed in proportion to the workload, supporting First Nations with the resources needed to effectively manage their consultations.

Communication and Application Status

In response to the survey feedback regarding status updates and communication, the Ministry has implemented a new process to ensure that application statuses are updated at each stage of the process. This improvement enables applicants to more effectively track the progress of their applications more effectively.

To further enhance transparency and consistency, the Ministry has introduced an internal policy regarding extension requests. This policy provides that all extension requests be assessed using standardized criteria, ensuring fairness and consistency in decision-making. Additionally, each request must include a well-defined rationale, and any extensions granted will be issued in 15-day increments. This structured approach provides applicants and First Nations with predictable timelines and a transparent process for managing extensions.

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MINISTRY ACTIONS

The following section outlines actions the Ministry is currently undertaking to improve the MCCF process and transparency:

System Improvements

The Ministry is actively exploring the use of technology solutions to streamline internal records management and support the documentation of consultation summaries. By leveraging technology efficiencies, the Ministry aims to reduce processing times by automating the records management and reducing the manual effort required to maintain complete records and action correspondence.

The Ministry is also undertaking work to modernize the MTO system, replacing the old system with one that’s easier to use and better aligned with new requirements, including built-in workflows for better efficiency and automation for faster service.

Enhance Transparency

In response to feedback received through the survey, the Ministry will update its existing external guidance materials and internal process documents to enhance transparency in the application and consultation process. Updated materials will provide applicants with a clear overview of each step, including estimated timelines. The Ministry will also ensure that application statuses are consistently monitored and clearly communicated throughout the process. By prioritizing clarity and accessibility, these updates aim to keep both applicants and First Nations well informed.

Furthermore, the Ministry will review the communication materials provided to First Nations, including referral packages and decision notifications. This process will focus on improving the clarity of information shared, such as including decision rationales in the decision notifications. Enhancing these materials will support greater transparency and strengthen the consultation process for First Nations.

Address Capacity Issues

To address capacity challenges and promote meaningful participation, the Ministry continues to secure and provide capacity funding for First Nations. This fiscal year, the Ministry is distributing capacity funding to First Nations, with a commitment to pursue additional funding in subsequent years to further support their involvement in the application review process.

In addition, the Ministry intends to increase support for the MCCF program by internally reallocating resources. By focusing on capacity building, the Ministry seeks to foster deeper engagement with First Nations and ensure timely, efficient processing of applications.

Accommodation Measures

During consultation with First Nations, the Ministry is able to consider potential accommodation measures to address impacts to Aboriginal rights and title or treaty rights. The Ministry also works with First Nations through the mineral claims consultation process to identify information-sharing opportunities. Examples from the program to date include providing links to a First Nation’s mining policy, engagement guidelines, or management direction for activities on a claim. Additionally, while consultation on mineral claims focuses on the activities permissible without a permit, the Ministry will share information from First Nations on topics that are relevant for the Notice of Work (NOW) process, to support NOW applicants in project planning and engagement. The Ministry will be seeking to expand this information sharing approach as the MCCF program evolves.

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NEXT STEPS

To ensure the MCCF program continues to meet the needs of both applicants and First Nations, the Ministry is committed to continuous improvement. Feedback will be actively collected from industry and First Nations to support identification of challenges and opportunities for resolution. This information will also be used to inform the *Mineral Tenure Act* review process, which will also include transparent consultation and engagement. Through this proactive approach, the Ministry strives to maintain a MCCF program that adapts to the needs of all users.

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APPENDIX 1—CLAIM APPLICANT SURVEY RESULTS

A total of 152 participants completed the survey. Most respondents identified as prospectors (116), followed by exploration company representatives (19), with smaller numbers of consultants, NGOs, and others.

Mineral (69) and placer (64) application types were most common, with 11 respondents applying for both. A few had not yet submitted applications

Appendix 1 summarizes survey data and written feedback collected during the 30-day survey period (October 26–November 26, 2025). The results are broken into 3 key areas: User Experience with Mineral Tenure Online; Ministry processes and communication about the consultation and accommodation process

1. USER EXPERIENCE WITH MINERAL TITLES ONLINE (MTO)

Respondents were asked to rate their agreement with several statements about using MTO and the claim application process:

- ▶ Finding Information: Most agreed they could find what they needed (72 strongly agree, 43 somewhat agree).
- ▶ Clarity of Steps: 67 strongly agree and 44 somewhat agree that steps were clear.
- ▶ Sufficient Information Provided: Responses were mixed—45 strongly agree, 44 somewhat agree, but 40 disagreed. Thirteen of those that disagree strongly disagree.
- ▶ Overall Satisfaction with MTO Platform: Opinions were divided—88 agreed (strongly or somewhat), while 43 disagreed.
- ▶ Overall Satisfaction with Application Process: Similar split—81 agreed, 49 disagreed.

Reported Difficulties

- ▶ 23 respondents experienced issues submitting applications (108 who did not).
- ▶ Common problems included map viewer complexity, system errors, consultation delays, unclear payment processes, and lack of guidance.

Additional Feedback Summary

- ▶ Approval Delays: Many reported waiting 4–7 months or longer for claim approvals, causing missed exploration season, financial and operational impacts.
- ▶ First Nations Consultation: Viewed as lengthy and unpredictable; some expressed concerns about fairness and transparency.
- ▶ MTO Platform Issues: Considered outdated and confusing, with navigation challenges, unclear maps, insufficient status updates, and payment before approval. Concern was expressed on the public display of pending applications that could allow for the exploitation of claims before approval.
- ▶ Process Confusion: Uncertain timelines, unclear rules, and lack of guidance were common concerns. Experienced users found it easier, but many requested clearer instructions and support.

Suggested Improvements from Applicants

Respondents suggested improvements focused on streamlining consultation and reducing delays. Key themes included clearer timelines, better guidance on First Nations engagement, and increased transparency on how feedback influences decisions. Participants also called

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for real-time status updates, a more user-friendly Mineral Titles Online platform, and differentiation between small-scale and industrial operations. Additional suggestions included stronger enforcement against illegal activity and simplifying processes to avoid unnecessary complexity.

2. MCCF PROCESS AND COMMUNICATION

The Survey also provided feedback on the MCCF process and Ministry communication on claim applications.

- ▶ **Satisfaction with Updates:** 66 respondents agreed they were satisfied with updates provided by the Ministry while 76 disagreed.
- ▶ **Knowing Where to Find Status Updates:** 77 agreed they could find the status while 47 disagreed.
- ▶ **Information on Decisions:** 48 agreed they received enough information about the decisions made on the claim, while 64 disagreed and 21 had no opinion.
- ▶ **Overall Satisfaction with Communication:** 54 agreed and 68 disagreed.

Additional Feedback Summary

- ▶ **Lack of Communication:** Respondents reported few or no updates, delayed notifications, and generic messaging. Suggested improvements include automated monthly “still processing” updates.
- ▶ **Process Delays:** Applications often take months, much longer than the previous system. Delays impact planning, seasonal work, and increase costs.

Consultation requirements were seen as unclear or excessive, especially for simple claims. Lack of clarity on which First Nations to consult and how feedback is handled.

3. INFORMATION ABOUT CONSULTATION AND ACCOMMODATION PROCESS

- ▶ **Fairness of Consultation and Accommodation:** 36 agreed that the process was fair. While 60 disagreed and 35 were unsure or had no opinion.
- ▶ **Transparency of the Process:** 35 agreed and 69 disagreed that the process was transparent. 29 provided no opinion or no answer.
- ▶ **Information Provided about Accommodations:** 37 agreed and 57 disagreed that the Ministry provided enough information about accommodations affecting claims.
- ▶ **Timelines for consultation and accommodation:** 23 agreed and 107 disagreed that that timeline met expectations.
- ▶ **Scope of Consultation:** 24 agreed and 58 disagreed that the scope of consultation was appropriate to the potential impact of the claim.

Reported Difficulties

The survey asked if the claim application was denied were the reasons clearly explained. This question was not applicable to the majority of respondents (122). One applicant responded positively while 6 reported that the reason was not clearly explained.

Additional Feedback Summary

Processing Delays: Many respondents reported extremely long timelines for approvals and consultation. Frequent complaints about poor updates and unclear processes.

Consultation Process: Respondents were often unclear on what was being consulted and what the expectations were.

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SUGGESTED IMPROVEMENTS TO MCCF

Consultation Process

- ▶ Consult after staking approval to allow immediate exploration.
- ▶ Identify which First Nations should be consulted and clarify expectations.
- ▶ Increase transparency on feedback received and its impact on claims.
- ▶ Provide educational guidance on interacting with First Nations.

Timeline Concerns

- ▶ Address delays in claim approval.
- ▶ Set clear, guaranteed timelines with automatic follow-ups.
- ▶ Emphasize that delays affect seasonal work and investment.
- ▶ Streamline non-contentious claims and speed up Notice of Work applications.

Transparency & Communication

- ▶ Offer clearer application status updates (e.g., dashboard or monthly reports).
- ▶ Provide better guidance on process steps and applicant requirements.
- ▶ Clarify MCCF's purpose and differences for small vs. industrial applicants.

Mineral Titles Online (MTO)

- ▶ Improve map interface usability and clarity.
- ▶ Hide application locations until officially staked to prevent claim jumping.
- ▶ Consider doubling staking fees to fund First Nations consultations.
- ▶ Offer credits if timelines exceed expectations.

Process

- ▶ Revert to previous system for faster approvals.
- ▶ Reduce bureaucracy and confusion in MCCF.
- ▶ Differentiate between hobbyist and industrial-scale operations.
- ▶ Enforce physical staking or stricter rules to curb speculative staking.

Enforcement & Compliance

- ▶ Increase enforcement against illegal mining during pending applications.
- ▶ Clarify legal rights in overlapping claims or disputes.

APPENDIX 2—FIRST NATIONS SURVEY RESULTS

A total of 18 participants provided feedback on their role and claim types in the consultation process. Most respondents identified as Referrals Coordinators (8), followed by Subject Matter Experts (4), with smaller numbers in Leadership (1) and other roles (1); four did not answer.

Most Nations have not received capacity funding to support consultation on claim applications (9 reported no funding, 3 reported receiving funding, and 6 did not answer). Among those that received funding, none found it sufficient for meaningful consultation. Regarding claim types received, mineral applications were most common (10), followed by placer applications (3); several respondents did not provide an answer.

Appendix 2 summarizes survey data and written feedback collected during the 30-day survey period (October 26–November 26, 2025). The results were broken down into 3 key areas: Clarity of Claim Applications; Process and Communication and Consultation and Accommodation.

1. CLARITY OF CLAIM APPLICATIONS

Respondents were asked to rate their agreement with several statements about the clarity and sufficiency of information in claim applications:

- ▶ **Information Was Clear:** Most agreed somewhat (8), while 3 somewhat disagreed and 2 strongly disagreed. Five provided no answer.
- ▶ **Information Was Understandable:** Positive responses dominated (2 strongly agree, 8 somewhat agree), with only 3 disagreeing (2 somewhat, 1 strongly). Five did not answer.
- ▶ **Enough Information to Assess Impacts:** Responses were mixed—only 3 agreed (1 strongly, 2 somewhat), while 10 disagreed (4 somewhat, 6 strongly). Five did not answer.
- ▶ **Overall Satisfaction:** Opinions leaned negative—4 somewhat agreed, but 9 disagreed (3 somewhat, 6 strongly). Five did not answer.

Additional Feedback Summary

Respondents shared several concerns about the process, capacity, and technical issues:

- ▶ **Process Concerns:** Information provided by the Province is generalized and transactional.
Nations were not consulted before the batching process was implemented. Batching prevents meaningful engagement and proper tracking of consultation.
- ▶ **Capacity Challenges:** The volume of applications exceeds what Nations can meaningfully assess. No new funding or positions have been created to manage the added workload under the court-ordered process.
- ▶ **Technical Challenges:** Some application packages lack shapefiles or contain incorrect formats (points instead of polygons). Claims have been duplicated across different batches. Mineral commodities are not clearly identified in submissions.

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2. PROCESS AND COMMUNICATION

Respondents were asked to rate their agreement with several statements about updates and information provided during the claim application process:

- ▶ **Satisfaction with Updates After Receiving a Batch:** 5 somewhat agreed, while 8 disagreed. Five did not answer.
- ▶ **Knowing Where to Find Status Updates:** 4 agreed, but 6 disagreed. Eight did not answer.
- ▶ **Enough Information About Decisions Made:** Only 2 somewhat agreed, while 11 disagreed. Five did not answer.
- ▶ **Overall Satisfaction with Communication and Updates:** 1 somewhat agreed, while 12 disagreed. Five did not answer.

Additional Feedback Summary

Respondents identified 3 key areas of concern:

- ▶ **Process and Communication:** Notices of Decision were received only after decisions were finalized. Notices were sometimes attached to the wrong file in the consultation portal.
Decision emails lacked explanation of how comments were considered, providing only basic administrative details.
- ▶ **Consultation Concerns:** Communication was transactional and undermines reconciliation. The process does not constitute meaningful consultation and is unlikely to advance reconciliation.
- ▶ **Capacity Constraints:** Nations lack capacity to process the volume of applications. Administrative shortcomings result in consultation records that fail to reflect the seriousness of constitutional concerns.

3. CONSULTATION AND ACCOMMODATION

Respondents were asked to rate their agreement with several statements about fairness, transparency, and overall satisfaction with the consultation and accommodation process:

- ▶ Fairness of the Phase: 2 somewhat agreed, while 11 disagreed. Five did not answer.
- ▶ Transparency of the Phase: 3 somewhat agreed, while 10 disagreed (4 somewhat, 6 strongly). Five did not answer.
- ▶ Enough Information About Possible Accommodations: 2 somewhat agreed, while 11 disagreed. Five did not answer.
- ▶ Satisfaction with Ministry's Response to Input: 2 somewhat agreed, while 11 disagreed (3 somewhat, 8 strongly). Five did not answer.
- ▶ Fairness of Final Decisions: Only 2 somewhat agreed, while 11 disagreed (5 somewhat, 6 strongly). Five did not answer.
- ▶ Overall Satisfaction with Consultation and Accommodation: 1 somewhat agreed, while 12 disagreed (3 somewhat, 9 strongly). Five did not answer.

Additional Feedback Summary

Respondents raised two major areas of concern:

1. Process and Communication

Process: No contact from the Ministry beyond batch submissions and late decision notifications. The process is perceived as checkbox-driven rather than genuine consultation.

Comments submitted by Nations appear ignored, with no substantive follow-up or consultation. No evidence that comments influence decisions or alert proponents to opposition. No decision statements or responses regarding accommodations were provided.

Proposed improvements were disrupted by external events (e.g., strike), creating uncertainty.

3	4-5	6-9	10	11	12	13-15	16-18
Introduction	Overview of the MCCF	Survey Results Summary	Lessons Learned	Ministry Actions	Next Steps	Appendix 1— Claim Applicant Survey Results	Appendix 2— First Nations Survey Results

2. Accommodations

Accommodations offered are weak, even for claims affecting areas critical to cultural survival. Genuine accommodation should be creative, sincere, and responsive—not perfunctory. Lack of engagement and transactional processes perpetuate systemic disenfranchisement

SUGGESTED IMPROVEMENTS TO MCCF

Suggested improvements focused on enhancing communication and engagement, extending response timeframes, providing accessible options for conditional reserves, increasing capacity funding tied to tenure fees, improving transparency through impact assessments and written responses to comments, and negotiating consultation processes under existing government-to-government agreements before proceeding with applications.