

August 18, 2020

Dear Minister of the Environment and Climate Change, The Hon. Jonathan Wilkinson

I am writing you on an urgent matter that requires your immediate attention

On July 16th, 2020 CanWhite Sands Corp (CWS), an Alberta based company, submitted an Environment Act Proposal (EAP), as per the Manitoba Environment Act (Public Registry File # 6057.00), to obtain Manitoba environmental approval to construct a silica sand processing facility and to produce 1.36 million tonnes of processed silica sand per year. The proposed silica sand processing facility will be located near Vivian, in Southeastern Manitoba.

Closing dates for comments on CWS EAP is August 25th, 2020.

Once the proposed silica processing facility receives Manitoba environmental approval, CWS intends to submit a second and separate EAP for environmental approval, under the Manitoba Environment Act, for its proposed silica sand mine and the mining method to extract the silica sand.

This splitting of a single proposed development project into two separate projects makes approval, under the Manitoba Environment Act, of the silica sand mine and the mining methods to extract the silica sand a foregone conclusion and also fails to provide citizens the full scope of information of the entire project.

The issue I wish to raise with you as the Minister responsible for Impact Assessment Act (IAA) is as follows;

Based on the information contained in CWS EAP, the company indicates that 15 percent of what they will extract from 200 feet below the surface in the Winnipeg Formation aquifer, using solutions mining method which is a unproven silica sand mining process, will be solids (silica sand and shale), while not explicitly mentioned (intentionally I might add) in CWS EAP the remaining 85 percent will be water. (page 12 - 2.1.1.1 CWS EAP)

After doing some basic math, based on 15 percent of what is being extract will be solids, we know that in order to produce 1.36 million tonnes of silica sand per year, CWS will also need to extract 7.7. million cubic meters of water on annual basis to produce said 1.36 million tonnes of silica sand per year.

We also know that the silica sand, once extracted and after going through the wet plant, the stockpiled processed silica sand will retain some percentage of water and the wet plant itself will use some of the 7.7. million cubic meters of water extracted in its wet plant operation.

Therefore, we estimate roughly 6.5 million cubic meters or more of the 7.7. million cubic meters of potable water extracted will need to be discharged.

This discharge of potable water will be released into the Brokenhead River which drains directly in Lake Winnipeg and will have adverse effects, as the discharged water will contain high levels of heavy metals, chromium and arsenic and will be acidic and contain possible neurotoxins as result certain chemicals being used in the wash plant, as Pyrite in the shale withdrawn with the sand and in the sand itself, will cause acid drainage and mobilization of heavy metals.

The release of deleterious substances into the Brokenhead River would be a clear violation of Section 36(3) of the Federal Fisheries Act.

The Chestnut Lamprey eel, with an extant population on the Brokenhead River and assessed as vulnerable and of special concern on schedule 3 of Species at Risk Act, will most certainly be adversely effects by this proposed development project.

The Brokenhead River is a fish bearing river, and flows through federal lands, as the Brokenhead River runs right through the Brokenhead First Nation, which to our knowledge has never been consulted by the Crown prior to CWS EAP submission with respect possible adverse effects to Brokenhead First Nation Section 35 Rights.

I have included links below to some of the press stories that highlights the public concern around these adverse impacts.

In addition, we will forward you a detailed independent scientific analysis and response to CWS EAP for approval by the Province of Manitoba once completed in the next few days.

We are therefore asking you, as the Minister responsible for IAA, to use your discretionary authority under Section 9(1)and designate not only CanWhite Sands Corp proposed silica sand processing facility, but also its silica sand mine and method used to extract the silica sand, as a physical activity for assessment under the IAA. As we are firmly of the opinion that said physical activities may cause adverse effects within federal jurisdiction and adverse direct or incidental effects and given the public concerns related to those effects this physical activity warrants the designation

Respectfully

Don Sullivan  
What The Frack Manitoba  
P.O. Box 259, Belair MB. R0E 0E0  
donsullivan10@outlook.com

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<https://steinbachonline.com/local/hundreds-sign-petition-against-silica-sand-mine?fbclid=IwAR0C2t15UNyDCK-RUR-ieVmdfgZfdkvhSCkM0qvDanT6fgO6BsU34HwjMXk>

<https://www.winnipegfreepress.com/local/sand-plant-threatens-drinking-water-critics-say-572105012.html?fbclid=IwAR1TSEd0cwNcZ171wCuQv33Q5sdIafmlkvPxBVBIBymjYo9f32v8bdDucko>

[https://winnipeg.sun.com/news/news-news/provincial-grits-want-extensive-review-of-proposed-sand-mine-by-province-feds?fbclid=IwAR3ObeW49hqYgxszgGeWeQhT1ir\\_FctHHXkm8DU\\_s0hq5Wn1laSyOZI\\_1PE](https://winnipeg.sun.com/news/news-news/provincial-grits-want-extensive-review-of-proposed-sand-mine-by-province-feds?fbclid=IwAR3ObeW49hqYgxszgGeWeQhT1ir_FctHHXkm8DU_s0hq5Wn1laSyOZI_1PE)

<https://www.watertoday.ca/ts-mb-could-new-frack-project-turn%20manitoba's-brokenhead-river-into-a-toxic-nightmare.asp?fbclid=IwAR3A1qB02P4aB8i7ocNlf7MhaCM91ayYwJYkHcR95uWsf2fALnE5FfbFsU>