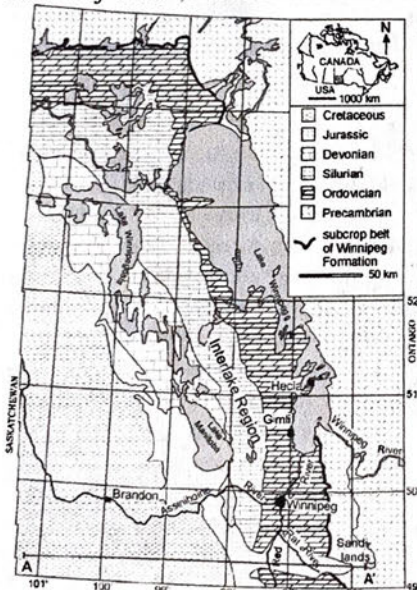


Dear Commissioners,

Our government is promoting mining in Manitoba, particularly silica sand, a non-renewable resource. There are currently 3 known silica projects, Victory Silica (Grand Rapids), Canadian Premium Sands (Hollow Water) and the proposed Sio Silica Corporation. The first two are licensed. It is extremely important that the cumulative effects of this industry in Manitoba be included in your assessment and recommendations to the minister.

The Commissions' consultant Arcadis states... "the exclusion of Sio Silica's sand processing facility and other supporting infrastructure from the scope of the current Environmental Assessment is inappropriate". They stated it is a "material deficiency". It is extremely important that "the potential impacts of the entire mining project throughout its life cycle including extraction, processing and transport should be evaluated by a single, comprehensive assessment that considers the Vivian Sand Project as one undertaking, not a series of independent and unrelated projects". [http://www.cecmanitoba.ca/hearings/silica-sand-extraction-project/doc/Geotechnical\\_Technical\\_Review.pdf](http://www.cecmanitoba.ca/hearings/silica-sand-extraction-project/doc/Geotechnical_Technical_Review.pdf)

In Manitoba, silica sand is found in the Winnipeg Formation. Surface deposits of the sand have been mined in the past on Black Island. The proposed project seeks an Environment Act License to exploit the silica sand 200 plus feet below surface. "Hydrogeology of the Winnipeg Formation in Manitoba Canada, G. Fergusson, R. Betcher, S. Grasby states *The Winnipeg Formation is the basal sedimentary unit throughout much of southern and central Manitoba, Canada, where it forms a regional aquifer over most of its extent. This aquifer is an important source of water in southeastern Manitoba and in Manitoba's Interlake area, but in most areas, groundwater within the aquifer is saline.*"



If granted a Licence, the potential exploitation of the Formation in southern and central Manitoba, using the proposed air lift mining method for silica, is likely. Currently, Sio Silica 4 claims (BRU, DEN, ALY, RWM) cover 11 municipalities on private property and possibly crown land. The BRU and DEN mines are located in the freshwater zone of the Formation. Cumulative impacts from air lift mining throughout the Formation and the risk of saline water intruding into the freshwater aquifer must be thoroughly assessed. The Commission must ensure the continued reliance on this freshwater source is not negatively impacted by the silica industry.

Map - Hydrogeology of the Winnipeg Formation in

Manitoba Canada  
Figure showing all 4 claims



"Our resources". <https://www.siosilica.com/silica>



Sio Silica Corp, a junior mining company from Alberta states it will make numerous missing critical plans available only after it gets an Environment Act License. This happened with another Alberta sand company, Canadian Premium Sands. (Must be an Alberta thing) Their proposed project underwent a provincial review and was granted a license with conditions e.g. completion of a traffic study. We have yet to see the study however a linked project, the Selkirk glass plant did contain a traffic study. However, the study stopped short and only assessed Selkirk yet round trips from the Hollow Water mine site, through our beach community to Selkirk, day and night including during cottage season will occur. It is unacceptable to hold back plans from a review process. It is untenable that our regulator would permit plans to be conditions of a license as it obstructs meaningful consultation and public input in the review process. The proposed Sio Silica project is following suit. The CEC must act to ensure that all missing plans and material deficiencies, as indicated in the motions raised by Participants, are made available to the public hearing process. I feel failure to do so undermines the public hearing process and meaningful public participation.

Further, the public deadline for written submissions should be slated after all the evidence has been presented and at least until the CEC consultants have presented their updated report. As it stands, the company and engineering firm are still designing a UV sterilization system. "Sio has not finalized the filtration and UV system design" (IR- Round 1 - 004

[http://www.cecmanitoba.ca/hearings/silica-sand-extraction-project/doc/ir\\_dln\\_wtfmb.pdf](http://www.cecmanitoba.ca/hearings/silica-sand-extraction-project/doc/ir_dln_wtfmb.pdf))

How is assessment and meaningful participation possible on something that is still undecided???

This is a major requirement of the project and needs to be in place to prevent contamination to the aquifer and health hazards to well water users. I request the proceedings be delayed until such time the proposed project is at a stage - concrete plans and supportive material - that will allow for a comprehensive and credible environmental assessment and meaningful public participation.

In addition to missing evidence, a heavily redacted geotechnical "report" was released after the provincial review public deadline for comments. Apparently only four pages from the report do not contain "trade secrets". Signing a restrictive Nondisclosure Agreement supposedly would allow access to these critical "trade secrets" but it prevent the signee to speak freely on personal impacts stemming from the mining. The CEC consultants are also critical, "Based on our experience in other contexts, none of the information provided to Arcadis to support our review would normally be classified as confidential and withheld from the Public Record... We are unaware of any reasons for withholding this or any other document that has been provided to date from the Public Registry. In the opinion of Arcadis, doing so has the potential to limit the use of the information as evidence during the EA decision-making process. It also has the potential to unnecessarily erode public trust that the EA process is open and transparent." I agree. Will the Commission follow their consultants' recommendation and release "the information provided to Arcadis" for the public hearing?

The sand is extracted through double cased industrial sized wells. Thousands of these wells will be abandoned. No mater the material used to seal the wells degradation will occur and leakage is inevitable. Consequently, these wells are potential lifelong sources of contamination to the aquifers by surface pollutants. The proposed project covers a large swath of agricultural land where chemical agricultural spraying and manure spreading from industrial livestock production ensues. It took 1 well contaminated with livestock manure to kill 7 and sicken thousands of residents of Walkerton, Ontario. <https://pubmed.ncbi.nlm.nih.gov/19180129/>  
The accumulation of tens of thousands of industrial sized wells throughout the project and four (4) claim properties increases the risk of contamination and health hazards to users. Residents outside the mined area are also at risk due to groundwater flow patterns. The risks are widespread and far outweigh any alleged benefit from the proposed project. This project must be denied an Environment Act License.

Manitobans have already spent over 200 million dollars trying to clean abandoned mine sites. In this case an entire aquifer system would need to be mitigated, if that is at all possible. Does the

junior mining company have the financial ability to cover present and inflationary costs from their "multigenerational" project? Is there another freshwater source currently not used that could be available to residents of southern and central Manitoba? Is it not more sensible and sound to respect and protect what we have; an aquifer that provides thousands with healthy, clean, fresh water?

The water, land and air is our life support system. It requires our utmost respect and protection.

Register my objection to this proposed project.

The Commission must strongly recommend to deny an Environment Act License for this project.

Respectfully,

