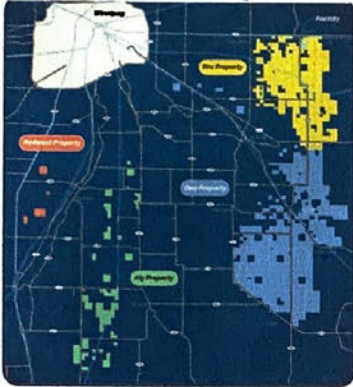


CEC letter

Dear Commissioners,

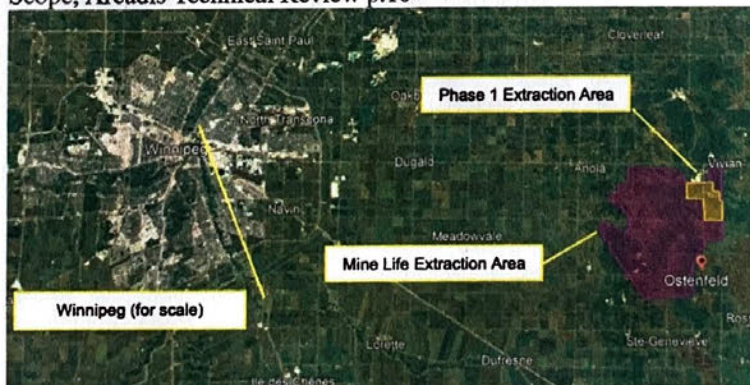
The proposed project has four silica sand mineral claim properties; Bru, Den, Aly, Redwest. These claims are throughout southern Manitoba. The company website provides a coloured rendering of the 4 claim areas and scale:



“Our Resources”

<https://www.siosilica.com/silica>

It is obvious the corporation’s plans for Manitoba are massive in scale however only a tiny portion, 4 years (Phase 1 Extraction Area) is under review as shown in Figure 5 Project Spatial Scope, Arcadis Technical Review p.10



Arcadis, clearly states my concern, “While breaking projects into phases is a common approach when issuing regulatory authorizations, it is inappropriate in the context of Environmental Assessment because it has the potential to underestimate the spatial extent, duration and therefore significance of project impacts...Similarly, the exclusion of Sio Silica’s sand processing facility and other supporting infrastructure from the scope of the current Environmental Assessment is inappropriate. 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...Arcadis considers this to be a material deficiency with the Project Proposal and recommends that the CEC explore options to evaluate the potential environmental impacts of the entire Vivian Sand Project, not just sand extraction." (Arcadis p. 10). Their concern is supported in the 2015 Manitoba Law Reform Commission Report on Manitoba's Environmental Assessment and Licensing Regime under The Environment Act. It states "to ensure more comprehensive environmental assessments take place and that the potential environmental effects of all aspects of a development are properly assessed... Sections 13(1) to 13(3) of The Environment Act should be repealed."

I request the Commission follow the recommendations from their independent consultants and include assessment of impacts from the entire Vivian Sand Project, extraction, processing, rail yard and transport of silica sand for the entire Mine Life Extraction Area. This assessment must also include cumulative effects from mining, processing and transportation for all four properties (Bru, Den, Aly, Redwest).

Although not identified in the consultant's report, the restrictive 4 year view prevents determination of federal jurisdiction. The Commission must assess if there are potential impacts to areas of federal jurisdiction in all four properties.

It is alarming that no noise study for mining operations was undertaken. When questioned on the matter the company responded to the Technical Advisory Committee issue #13 that the Facility noise assessment is sufficient and assumes that vegetation, well maintained machinery, a 100m setback, eliminations of unnecessary idling, and "portable noise barriers as required" was sufficient. [https://www.gov.mb.ca/sd/cal/registries/6119/table1\\_responses\\_to\\_tac\\_20211215.pdf](https://www.gov.mb.ca/sd/cal/registries/6119/table1_responses_to_tac_20211215.pdf) Arcadis also notes "the Proposal lacks a commitment to perform noise monitoring during operations."(p. 22) The proposed project is slated for 24/7/365 operations. If weather permits mining could occur year round alongside drilling, and land clearing. Mining operations are not similar to Facility noise emissions. Noise from mining operations must be assessed.

Additionally, a cumulative noise assessment of the Facility/railway/rail yard, the mining, and surrounding environment must occur. It is unacceptable for any mining operation to avoid a study on a subject that is known to negatively affect the health and wellbeing of humans. Livestock and wildlife will also be negatively impacted by the constant noise. This must be analyzed.

There are a significant number of plans not available for review or at a "preliminary draft stage". These plans such as the Groundwater Monitoring and Impact Mitigation Plan are relevant to the Proposal. How are we "to confirm that management practices will adequately address any potential environmental impacts."(Arcadis p.27).

The mining Proposal, Hydrogeology and Geochemistry Report(Report) 8.3 Part 1A states mining operations where "*simulated to be positive due to reduction of concentrations of iron and manganese when oxygen (air) is introduced into the aquifer or is allowed to mix with water containing lower concentrations of those elements...Although the naturally elevated concentrations of dissolved iron and manganese were simulated to decrease in response to aeration or mixing, they may remain elevated above drinking water quality criteria during and following operations.*"

When exposed to oxygen, iron and manganese oxidize and produce discoloured water. When brown water flowed out of Winnipeg resident's taps it was deemed unacceptable yet for rural Manitobans it is an "improvement". I used to live in the area. The water did not need treatment; was clear, clean, and safe. We had no concerns. Today, family and friends who still live in the area are stressed and concerned for the environment, their health and property values.

From September 13, 2022, "The Management Plans submitted to date lack the information necessary to confirm that operational practices will be capable of identifying and mitigating potential environmental impacts from the Project...To illustrate, we [Arcadis] expected that the *Groundwater Monitoring and Impact Mitigation Plan* would provide detailed descriptions of the Proponent's commitments to ensure local and regional groundwater is adequately protected.

Unfortunately, with the exception of cursory and preliminary descriptions, the plan provides limited insights into the steps that will be taken to protect the groundwater resource.” (p.26).

Sio Silica website states: Industrial silica has a significant role in how we live and is the primary invisible ingredient that keeps our society running. <https://www.siosilica.com/silica>

It is our environment that has the significant role; it provides and sustains life. This basic fact is invisible and lost to this mining company in its exploitation of a freshwater resource for profit. Simply put, mining has no place in drinking water.

Register my objection to this proposed project.

The Commission must strongly recommend to deny licensing.

Sincerely,

