

DANIEL BLAIKIE MP

Elmwood—Transcona

Hon. Jonathan Wilkinson
Minister of Environment and Climate Change
House of Commons
Ottawa ON K1A 0A6
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April 20, 2021

Dear Minister Wilkinson,

I am writing in solidarity with many other Manitobans who would like to see the CanWhite Sands Corporation's Vivian Sand Extraction and Processing Plant Project designated for a Federal Impact Assessment under the *Impact Assessment Act*.

Your recent decision not to designate this project has people worried. There are legitimate concerns about the proposal and I urge you to reconsider this decision. The potential risks relate to: changes to the environment, including the quality and quantity of ground and surface water, effects on fish and fish habitat and species at risk, human health, socio-economic conditions, and the rights of Indigenous peoples.

One of the main causes for concern is that the project is based on a new and unproven technology. CanWhite Sands has admitted as much in its submissions and further study is required to assess the technology's potential interactions with the environment. This uncertainty demands a high level of initial oversight.

Unfortunately, we have a provincial government that has demonstrated a high level of enthusiasm for the project and a low level of concern for its environmental and human consequences. Given the lack of trust in, and the low level of scrutiny by, the Manitoba government in this regard, a Federal Impact Assessment would do a lot to help people in the area feel that their well documented concerns have been given their proper due before the project proceeds.

The advocacy group What the Frack Manitoba has identified a number of ways in which the company's submissions to your department and other licencing authorities fail to address real concerns about aquifer contamination and the novel engineering principles of the sand extraction process.

Of particular concern is the return to the sandstone aquifer of large amounts of water extracted with the sand by air lift pumps. This aerated water will react with proven sources of sulphide to acidify the aquifer causing the mobilization of heavy metals to further contaminate the aquifer.

Beyond appealing to your own stated concern for the environment and discretionary authority granted to you in this matter as the Minister, I note that this project appears to meet the threshold for an automatic trigger of a Federal Impact Assessment based on CanWhite Sands' need to transport the processed sand by rail.



According to the *Physical Activities Regulations* (SOR/2019-285) of the *Act*, the cumulative impacts of a rail yard with a total area exceeding 50 hectares will be subject to an Assessment. CanWhite Sands Corporation would not be capable of sending their product to market in the quantities they claim in their submissions without the construction of a rail yard larger than 50 hectares.

The Impact Assessment Agency of Canada should conduct an in-depth review of all materials sent to you and the Agency to date, including:

- The LeNeveu report *“Evidence for Aquifer and Slurry Line Contamination and Land Subsidence from Vivian Silica Sand Extraction Wells”* (47-page) submitted on February 16, 2021 and the related review by Dr. A.R. Ingraffea of Cornell University.
- The *“Critique of CanWhite Sands Minor Notice of Alteration, 2021.01.22”* (7-page) submitted on February 23, 2021.
- The report *“Reasonable Apprehension of Bias by the IAAC and Manitoba Regulators in Non-Designation of the CWS Vivian Sand and CN/CWS Rail Yard Projects”* (26-page) submitted on March 30, 2021.

These and any other documents received by your department in this matter should be shared with any other bodies involved in reviewing the project or providing advice to government about the project, whether in previous or future rounds of consultation.

The stakes are high for the environment, the people and the wildlife in the immediate vicinity of the project and beyond. Do not allow the Vivian Sand Project to be a live and largely unsupervised experiment with unproven technology. Leaving the due diligence on the project solely to the current Manitoba government would effectively amount to that.

I close by urging you once again to live up to your responsibility to protect our environment and trigger a Federal Impact Assessment without further delay.

Sincerely,



Daniel Blaikie, M.P.
Elmwood–Transcona

