



MANITOBA ECO-NETWORK

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November 28, 2022

Honourable Jeff Wharton
Minister of Environment, Climate and Parks
minecp@leg.gov.mb.ca

Eshetu Beshada, Senior Environmental Engineer
Environmental Approvals Branch
Manitoba Environment, Climate and Parks
Eshetu.Beshada@gov.mb.ca

Dear Minister Wharton and Eshetu Beshada,

Re: MbEN Comments – Canadian Premium Sand Inc. – Selkirk Solar Glass Manufacturing Facility, File No. 6137

The Manitoba Eco-Network (MbEN) appreciates the opportunity to comment on Canadian Premium Sand Inc.'s (CPS) Selkirk Solar Glass Manufacturing Facility Environment Act Proposal (EAP). We have reviewed the file, and respectfully request that you refer the assessment to the Clean Environment Commission (CEC) for a public hearing, making participant funding available. As part of this process, the department should initiate a public outreach program to get input on the terms of reference for the hearing and the funding envelope for the participant funding program.

Our request to have CPS's project referred to the CEC is based on information deficiencies in the EAP and a need for a more robust approval process. There are significant community concerns with the cumulative impacts of CPS's planned and ongoing activities in this region, including their Wanipigow Sand Extraction Project. Important issues such as impacts on traffic and local infrastructure were not adequately addressed in Environment Act License 3285 and must be considered in the approval of CPS's directly related Manufacturing Facility. There is a need for more meaningful public engagement opportunities, independent technical review of CPS's proposed project, and more information on its potential cumulative impacts.

Information requirements not met according to Manitoba EAP Report Guidelines

There are gaps in the information provided by CPS in its EAP according to the requirements set out in the Government of Manitoba's [EAP Report Guidelines](#). More details are needed in regard to the:

- Potential environmental and cumulative effects of the proposed project, such as, but not limited to:
 - Impact of traffic, including the impact of traffic from the Wanipigow extraction site.
 - Impacts on local infrastructure such as Highway 304 and the Pine Falls Dam/Bridge.

- Climate change considerations including, but not limited to, “the amount of greenhouse gases to be generated by the proposed development and the energy efficiency of the proposed development” (*The Environment Act*, s 12.0.2)
- Project funding, including information about “any government agency or program (federal, provincial or otherwise) from which a grant or loan of capital funds have been requested”.

High GHG Emissions

MbEN also has concerns about the potential GHG emissions of the manufacturing facility. The project will generate an est. 400,000 tonnes of CO₂e per year. This would make this development the second largest GHG emitter in Manitoba, the first being the Koch Fertilizer Manufacturing Facility in Brandon.¹ Legislators at both the provincial and federal level have recognized the importance of considering the climate impacts of proposed projects, such as “the extent to which the effects of the designated project hinder or contribute to the Government of Canada’s ability to meet its environmental obligations and its commitments in respect of climate change” (*Impact Assessment Act*, s 22(1)(i)).

There is a need to consider the potential emissions of CPS’s proposed project in light of the Government of Manitoba and Government of Canada’s climate change commitments and allow further public scrutiny of this project’s climate impacts.

The Need for a Public Hearing

MbEN has submitted numerous comments on silica sand extraction and manufacturing projects over the past few years, including CPS’s Wanipigow Sand Extraction Project, Sio Silica’s Vivian Sand Processing Facility, and Sio Silica’s proposed Vivian Silica Sand Extraction Project. We have demonstrated that there are significant concerns with proposed and ongoing silica sand development activities from environmental organizations, and more importantly, from concerned community members living near the project sites. Local citizens are very worried about impacts to air and water quality, among other things, and how such environmental damage will impact their health and the health of their family members.

There is a need for a robust provincial assessment process that ensures all potential impacts of proposed silica sand developments, including cumulative and climate impacts, are properly considered. A public hearing held by the CEC, with sufficient participant funding, will enhance the assessment process, facilitate more opportunity for meaningful consideration of public participation, and ensure the environment is protected and local communities are able to sustain a high quality of life for this and future generations.

About MbEN

Since 1988, MbEN has promoted positive environmental action by supporting people and groups in our community. We are a public interest environmental organization seeking to promote and facilitate good environmental governance and the protection of Manitoba’s environment for the benefit of current and future generations.

¹ Climate Change Connection, “Manitoba Large Final Emitters (LFE)”, online: <https://climatechangeconnection.org/emissions/manitoba-ghg-emissions/manitoba-large-final-emitters-lfe/>

MbEN appreciates your consideration of our comments about the environmental assessment and licensing of CPS's Solar Glass Manufacturing Facility and welcomes future opportunities to engage with the Department in the assessment of projects in Manitoba to ensure the highest level of environmental protection measures are required. Under *The Environment Act*, the Department of Environment, Climate and Parks is tasked with protecting the quality of the environment and environmental health of present and future generations and providing the opportunity for all citizens to exercise influence over the quality of their living environment. We are confident you will adhere to these principles and ensure an informed decision about the proposed development and the need for a public hearing can be made.

Sincerely,

Heather Fast, B.A., J.D., LL.M.
Policy Advocacy Director

Glen Koroluk
Executive Director