



MANITOBA ECO-NETWORK

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February 18, 2026

Honourable Mike Moyes
Minister of Environment and Climate
Change
minecc@manitoba.ca

Agnes Wittmann
Director, Environmental Approvals Branch
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Jennifer Winsor
Environmental Approvals Branch
jennifer.winsor@gov.mb.ca

Dear Minister Moyes, Director Wittmann, and Ms. Winsor,

Re: Inquiry about Canadian Premium Sand (CPS) Inc. Licence No. 3285R, Wanipigow Sand Extraction Project

The Manitoba Eco-Network (MbEN) sends this correspondence to inquire about the status of Canadian Premium Sand Inc.'s Wanipigow Sand Extraction Project and Environment Act Licence No. 3285R. The original licence for the project, Licence No. 3285 issued on May 16, 2019, was rescinded and replaced with Licence No. 3285R on July 27, 2023.

Over the last six years, MbEN has been engaged in the impact assessment and licensing process for an increasing number of silica sand extraction and processing developments being proposed in Manitoba. We have also partnered with community organizations, like Camp Morningstar to support their efforts to protect their lives and families from the negative health and environmental consequences that can be caused by silica sand developments.

Since 2019, the Department of Environment and Climate Change has repeatedly failed to hold Canadian Premium Sands accountable for its questionable behavior and significant delays in the construction and operation of its proposed silica sand mine. This includes the violation of CPS's original Licence No. 3285, which indicated that, "if the Licensee has not commenced construction of the Development within three years of the date of this Licence, the Licence is revoked." Despite evidence from local community members indicating no such construction had commenced within that time period, the Department deemed the Licence valid in 2022.

This was then followed by the approval of a "minor" alteration to the project that completely changed its scope and resulted in the issuance of the new Licence No. 3285R, which no longer contains a clause that requires CPS to commence (or complete) the construction of this new version of the project within a certain time period. A disingenuous move that indicates that the Government of Manitoba still prioritizes the needs of industry over the concerns of the

community members that will be detrimentally impacted by the development of a silica sand mine in their traditional territory.

The impacted rights holders and community members living near the Wanipigow project area are now locked into a holding pattern of anxiety and stress as they continue to have little to no information about the potential timeline of the project and its future impacts on their lives. This lack of information is exacerbated by the fact that the Department has not published any of the environmental plans and programs required to be submitted and approved before any project activities occur. This includes:

- the Erosion and Sediment Control Plan;
- the Surface Water Management Plan;
- the Heritage Resources Management Plan;
- the Emergency Response Plan;
- the Dust Management Plan;
- the Air Quality Monitoring Plan;
- the Progressive Rehabilitation Plan;
- the Wildlife Monitoring Plan;
- the Groundwater Monitoring Plan; and
- the Revegetation Monitoring Plan.

Licence No. 3285R also requires CPS to:

- “with guidance from local Indigenous communities, undertake surveys for traditional use plant species used for medicinal or cultural purposes within the project area of the development and implement appropriate mitigation measures where traditional use plant species are located.” (s 16)
- “work with local Indigenous communities to identify appropriate setback areas and mitigation strategies for locations where Indigenous members practice ceremonial and customary land practices in close proximity to the project area of the development.” (s 18)
- “work with local Indigenous communities to identify and mitigate adverse impacts to local trappers due to the development.” (s 20)
- “work with local Indigenous communities to identify potential use of forest products harvested during clearing of the right of way and identify stockpile locations for public access to firewood.” (s 40)
- “establish a monitoring advisory group with representation from local Indigenous communities, to be meaningfully involved in project monitoring on a long-term basis. The group, at a minimum, is required to establish a terms of reference, acceptable to the director, to guide the membership, provide advisory group meeting minutes and reports, reports of monitoring and assessment of mitigation and other material relevant to the development to be available to local Indigenous community members.” (s 102)

There is no public information indicating any of these actions have taken place in compliance with the licence and community members continue to be left in the dark about what is going on in their home territory.

As a result of all this missing information from the public record and the ongoing community concerns about the Wanipigow Sand Extraction Project, we urge the Department to investigate the operations of CPS and enforce the conditions of Licence No. 3285R. This includes the potential revocation of the Licence for failing to meet the specifications, limits, terms, or conditions set out in the licence.

We also strongly recommend publishing the required environmental plans and programs developed by CPS for this project in the public registry, if they exist. A public update about the status of CPS's compliance and engagement with local Indigenous communities, including the development of a monitoring committee, would also be extremely helpful. Public access to this information could help reassure local community members that their environmental concerns have been heard and are being addressed by the licensing conditions.

Under *The Environment Act*, the Department of Environment and Climate Change 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 continue working to improve the way Manitoba undertakes impact assessment and project licensing moving forward.

Sincerely,

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

A handwritten signature in black ink that reads "Heather Fast". The signature is written in a cursive, flowing style.