



MANITOBA ECO-NETWORK

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Honourable Mike Moyes
Minister of Environment and Climate Change

Director Agnes Wittmann
Environmental Approval Branch,
Environment and Climate Change

Manitoba Public Registry

April 14, 2026

Dear Minister Moyes and Director Wittmann,

Re: File No. 6275.00 - Sio Silica, Simba Sand Extraction Project

This correspondence is from the Manitoba Eco-Network and Our Line in the Sand in response to the new documents and public comments posted in the public registry file (File No. 6275) for Sio Silica's Simba Sand Extraction Project.

After reviewing the published information, our organizations bring to your attention significant ongoing concerns and opportunities that should have a bearing on any forthcoming decision made with respect to the project.

First, the public comments make it clear that there is strong and overwhelming public opposition to the proposed development. Second, there continue to be important gaps in publicly available information with respect to Project Simba that must be addressed. Third, as this project is of significant public interest, if the decision is made to allow this project to move forward through the impact assessment and licensing process, at a minimum, it should be qualified as a Class 3 development and the Minister should request a full public CEC hearing be held, with participant funding. Fourth, Sio Silica's aggressive and ongoing marketing campaign with respect to this project is of public concern and raises opportunities for law reform in the public interest. Fifth, this project raises issues and opportunities with respect to the long-term protection of water resources in this province for the benefit of all Manitobans.

We would be happy to discuss these matters further with you, if that is desired.

Overwhelming Public Opposition:

The public comments relating to the EAP for the Simba Project demonstrate the significant public opposition for this proposed development. Of the 2171 comments posted, only 32 (1.5%) were in favour of the project proceeding.

In our experience, this is likely the most comments ever received in response to an EAP, which is telling in and of itself. In addition, the vast majority (98.5%) provide numerous reasons why this project should not be allowed to proceed. Manitobans have clearly indicated their preferred method for protecting a clean, safe and healthy environment. In light of such overwhelming public opposition, we urge you to reject Sio Silica's application now.

Missing Information:

The Technical Advisory Committee (TAC) and Department staff have recognized the significant gaps in information that continue to exist in relation to the Simba Project. The resulting request for additional information reflects a number of concerns articulated by local community members.

However, there is still missing information from the public record, including the comments of a few public participants who could not find their submission within the consolidated public comment documents. The document with a summary of the public comments also does not seem to accurately reflect the tone and content of many submissions and instead seems to have softened the language used to make the position of public participants more neutral, which is concerning.

In addition, we would appreciate more information from the Department about the unfulfilled recommendations for Government that were made by the Clean Environment Commission (CEC) when Sio's silica sand extraction project was rejected in February 2024. For example, the CEC recommended the Government of Manitoba "seek a legal opinion with respect to sections 2(e) and 3(1) of the *Well Standards Regulation* under *The Groundwater and Water Well Act* and section 6(1) of the *Drilling Regulation* under *The Mines and Minerals Act*, regarding the interconnection between the Winnipeg Formation and any overlying aquifer, including aquifers within the Stonewall, Stony Mountain or Red River Formations."

We would appreciate knowing whether such an opinion has been sought, and if so, what the conclusions were on this matter. If a legal opinion has been obtained, legal privilege should be waived to at least share a summary of the findings given the significant public interest in the matter and the fact that the CEC recommended the legal opinion be sought to provide clarity with respect to the current state of the law in Manitoba.

A Fully Funded Public Hearing:

So far, the Director and/or Minister do not appear to have made a decision about the progression of this proposed development. Our organizations are still strongly opposed to Project Simba in light of the potential impacts on drinking water, among other concerns previously expressed.

If the decision is made, however, to allow this project to move forward through the impact assessment and licensing process, at a minimum, **the Minister should request a full public CEC hearing be held, with participant funding, since this is a project of significant public interest.** This would be the second time Manitobans would go through a public hearing since Sio Silica is once again refusing to provide crucial information. As a result, it should be the Proponent, not the people of Manitoba, that should foot the bill.

We also strongly recommend the Simba Silica Sand Project be designated as a Class 3 development due to the potential significant and irreversible harm to the drinking water source of 100,000 Manitobans. A Class 3 designation would ensure the Minister is the decision-maker for the impact assessment and licensing process, which is appropriate due to the significant public interest in this development.

Corporate Entitlement and Regulatory Capture:

The corporate behaviour of Sio Silica since the impact assessment process began has been of significant concern to our organizations. In particular, the aggressive PR campaign complete with paid advertisements on billboards, the radio, buses, and sponsorship of industry events, including those at

which the Minister of Environment and Climate Change and Minister of Business, Mining, Trade and Job Creation have spoken and Department staff have undertaken recruitment activities. We have heard from Manitobans that this has exacerbated local concerns and significantly increased worries of bias and unfair access to government by industry (i.e. regulatory capture) within the Government of Manitoba.

It is problematic for a company to engage in a public campaign that can have no real purpose but to influence the public and government decision-makers. This is especially the case when the company has been making disparaging comments about the stakeholders who were involved in the previous impact assessment process. For example, at a December 2025 conference held the same week public comments were due for the EAP, Sio Silica's spokesperson equated public concerns about the proposed project with "social media influencers trying to fly a plane instead of a pilot", a bizarre, inflammatory and completely inaccurate description. Despite considerable expert evidence presented at the CEC hearing, and subject to cross-examination, Sio Silica described the situation as one where "with projects and in mining and natural resources, as soon as someone says something online, automatically, it's believed." It is clear that Sio Silica is still not taking public concerns seriously.

Proponents already have unequal access to Department staff during the impact assessment process. For example, based on the date of the documents published in the public registry file, Sio Silica was provided with the TAC and public comments 7 days before they were provided to the public. The recent Provincial Budget has also highlighted the significant financial support being provided to the development of new natural resource projects, particularly in the area of critical minerals and mining. There are no equivalent investments in the improvement of environmental protection measures and the development of legal pathways for citizens to protect themselves and their local communities from the potential negative consequences of natural resource developments.

We recommend considering reforms that could be made to *The Environment Act* or other applicable legislation, that would prevent unethical behaviour from proponents undergoing the impact assessment and licensing process in Manitoba. For example, one option could be a limitation on the advertising that is allowed to take place while the proponent's proposed development is under consideration by decision-makers, similar to the advertising ban governments face during election periods.

We recognize that the proposed changes in Bill 37, *The Environmental Statutes Amendment Act*, such as the prohibition on false and misleading information under the new section 23.1, may create an opportunity to address unethical behaviour and misleading information provided by proponents, however, we believe stronger measures are needed to protect Manitobans.

Long-Term Protection of Water Resources:

The ultimate goal of the Manitoba Eco-Network and Our Line in the Sand is to ensure the long-term protection of the Winnipeg Sandstone and Red River Carbonate aquifers. This important source of drinking water for local community members is integral to their lives. The decimation of this water resource would detrimentally impact current and future generations. As the recent 2026 UN report on [Global Water Bankruptcy](#) states: "Water is fundamental to sustainable development, human well-being, and planetary health. When water systems fail, the effects are swift and far-reaching: harvests decline, energy systems are disrupted, public health is endangered, cities become increasingly unlivable, livelihoods are lost, communities are displaced, tensions escalate, and the foundations of peace and stability are undermined."

Our organizations recommend the development of additional legal protections for the Winnipeg Sandstone and Red River Carbonate aquifers, including a moratorium on developments with the potential to cause damage or additional mechanisms under *The Water Protection Act*. This could be an appropriate matter for the CEC to investigate under section 6(3) of *The Environment Act*. Part of this conversation should also include consideration of expanding the scope of developments captured under the Classes of Development Regulation to ensure all proposed developments with the potential to impact precious water resources, like A.I. Data Centres, undergo the impact assessment and licensing process under *The Environment Act*.

The Government of Manitoba and the Department of Environment and Climate Change have an opportunity to send a clear message to the increasing number of developers who want to exploit our precious natural resources and make it clear that the health and safety of many Manitobans should be prioritized over the economic benefit of a few. When it comes to clean drinking water – one of the most precious resources in the world – the focus should be on protecting people and the environment in which they live first.

Conclusion

MbEN and OLS recommend the rejection of the proposed Simba Silica Extraction Project.

If the decision is made, however, to allow this project to move forward through the licensing process, it should be subject to a robust impact assessment process to ensure the full scope of concerns and potential impacts are properly understood before irreversible harm occurs to the Winnipeg Sandstone and Red River Carbonate aquifers. This will require a full public CEC hearing, with participant funding.

We also recommend the consideration of legal reforms that will better protect precious water resources and ensure impacted community members are able to engage in the impact assessment process on a level playing field.

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 ensure an informed decision about the proposed development will be made.

MbEN and OLS appreciate your consideration of our comments about the impact assessment and licensing of Sio Silica's proposed silica sand extraction project. We welcome future opportunities to engage with the Government on the assessment of projects in Manitoba to ensure the highest level of environmental protection measures are required. This includes a meeting to discuss any of the matters we have addressed in this letter.

Sincerely,

James Beddome, Executive Director, Manitoba Eco-Network

Heather Fast, Policy Advocacy Director, Manitoba Eco-Network

Tangi Bell, Chair, Our Line in the Sand