



Environmental Health Program (EHP)  
Regulatory Operations and Regions Branch (ROEB)  
Health Canada  
391 York Avenue  
Winnipeg, MB R3C 0P4

August 30, 2021

Ian Martin  
Impact Assessment Agency of Canada  
600-55 York Street  
Toronto, ON  
M5J 1R7

*Sent by email to:* Ian.Martin@iaac-aeic.gc.ca

**Subject: Health Canada's review of new information on the Vivian Sand Extraction Project**

Dear Ian Martin:

Thank you for your request dated August 16, 2021, requesting Health Canada's review of new information on the Vivian Sand Extraction Project (the Project). Health Canada has completed a review of the application materials submitted by CanWhite Sands Corp. (Proponent) under the *Manitoba Environmental Act* in support of the Project. Health Canada's previous response to the Federal Authority Advice Record (FAAR) request, submitted September 14, 2020, outlined the potential for the Project to affect human health due to changes in drinking water quality, noise, and air quality. The comments below focus on the following questions in your current request:

- 1) From the perspective of the mandate and area(s) of expertise of your department or agency, does the Extraction Project have the potential to cause adverse effects within federal jurisdiction or adverse direct or incidental effects as described in section 2 of IAA? Could any of those effects be managed through legislative or regulatory mechanisms administered by your department or agency? If a licence, permit, authorization or approval may be issued, could it include conditions in relation to those effects?*

The Project may have the potential to cause adverse effects on the health of Indigenous peoples, which is within federal jurisdiction. Detailed information on engagement and the Project's potential interaction with local First Nations and Métis communities was not included in the new information. This was also noted in our previous comments, and consequently limited our ability to comment constructively on possible adverse effects to health of Indigenous peoples. However, information available from the Canadian Impact Assessment Registry indicates that Indigenous communities have health-related concerns associated with the Project. As an example, the Brokenhead Ojibway First Nation raised concerns about possible Project impacts to surface water sources and potential to affect on-reserve drinking water<sup>1</sup>. This concern was not considered within the Project submission, and Health Canada has limited ability to comment on those potential impacts.

---

<sup>1</sup> <https://iaac-aeic.gc.ca/050/evaluations/proj/80974/contributions>



Health Canada is not a regulatory body and does not issue any approvals or make any regulatory decisions with respect to development projects. Relevant legislative or regulatory mechanisms may be administered by other federal, provincial, and municipal partners, reflecting the shared jurisdiction for environmental and human health within Canada. For example, the responsibility for provincial drinking water systems, including regulations, rests with the Province of Manitoba while Chiefs and councils manage the day-to-day water and wastewater systems on First Nations reserves. Indigenous Services Canada (ISC) provides independent public health advice and guidance to communities and supports monitoring programs for drinking water quality<sup>2</sup>. Should the Project be designated under the *Impact Assessment Act* (the Act), Health Canada can provide expertise on issues addressed within its departmental mandate to support the Impact Assessment Agency of Canada with its review.

2) *Does your department or agency have a program or additional authority that may be relevant and could be considered as a potential solution to concerns expressed about the Projects? In particular, the following issues have been raised by the requestors:*

- a. Impacts due to groundwater withdrawal quantity*
- b. Impacts on water quality through releases or accidents*
- c. Impacts on soil quality*
- d. Contamination of fish bearing waters*
- e. Impacts on air quality and atmospheric environment, including noise and light pollution*
- f. Impacts to human health and socioeconomic conditions*

*If yes, please specify the program or authority.*

As a Federal Authority, Health Canada provides specialist or expert information and knowledge in the Department's possession (expertise) to support the assessment of potential impacts on human health from projects considered individually and cumulatively under the Act. The programs associated with this expertise largely focus on national level knowledge generation and development of guidance, guidelines, standards and tools. Health Canada does not have programs or additionally authority that would be relevant to the above-noted issues raised by the requestors.

Relevant programs may be administered by other federal, provincial, and municipal partners, reflecting the shared jurisdiction for environmental and human health within Canada. For example, relevant funding opportunities related to health promotion and chronic disease prevention may be available through the Public Health Agency of Canada<sup>3</sup>. Health Canada understands that ISC may provide funding and advice for water systems on First Nations reserves, and they may have other relevant programs like the First Nations Environmental Contaminants Program<sup>4</sup> which can support First Nations communities in identifying, investigating, and characterizing the impact of exposure to environmental hazards.

---

<sup>2</sup> <https://www.sac-isc.gc.ca/eng/1314034319353/1533665196191>

<sup>3</sup> The current list of grant and contribution funding opportunities from PHAC are available at: <https://www.canada.ca/en/public-health/services/funding-opportunities/grant-contribution-funding-opportunities.html>

<sup>4</sup> Available at: <https://www.sac-isc.gc.ca/eng/1583779185601/1583779243216?wbdisable=true>



Health Canada Santé  
Canada Canada

Please contact Julie Anderson at <email address removed> if you have any questions regarding Health Canada's comments.

Sincerely,

<Original signed by>

Paul Partridge  
A/Regional Manager, Manitoba/Saskatchewan Region  
Environmental Health Program  
Regulatory Operations & Enforcement Branch  
Health Canada

cc: Heather Jones-Otazo, A/Manager, Environmental Assessment and Contaminated Sites Division, Healthy Environments and Consumer Safety Branch (HECSB), Health Canada  
Aurelia Thevenot, A/Senior Environmental Health Specialist, HECSB, Health Canada  
Julie Anderson, Impact Assessment Specialist, EHP, ROEB, Health Canada  
Debra Nkusi, Senior Policy Analyst, Environmental Public Health Division, FNIHB, Indigenous Services Canada