



Environmental Health Program (EHP)
Regulatory Operations and Enforcement Branch (ROEB)
Health Canada
391 York Avenue
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October 12, 2021

Shelly Boss
Impact Assessment Agency of Canada
Canada Place
Suite 1145, 9700 Jasper Avenue
Edmonton, AB
T5J 4C3

Sent by email to: Shelly.Boss@iaac-aeic.gc.ca

Subject: Health Canada's review of new designation request and information for the Vivian Sand Project

Dear Shelly Boss:

Thank you for your September 23, 2021 letter requesting Health Canada's review and feedback on a new designation request and supporting information for the Vivian Sand Project (the Project). Health Canada has reviewed the current request and supplementary material, which continue to support the department's responses to the previous Federal Authority Advice Record (FAAR) request, submitted September 14, 2020, and to the request for review of new information (pertaining to the extraction portion of the Project only), submitted August 30, 2021. Health Canada's previous comments outlined the potential for the Project to affect human health and the health of Indigenous peoples due to changes in drinking water quality, noise, and air quality.

The following comments focus on the new information provided in your current request.

HC Comment #1: The current designation request seeks to incorporate both the Vivian Sand Extraction Project and the Vivian Sand Processing Facility Project. This is an inclusive approach, which supports the assessment of potential cumulative effects. The designation request also identified the CanWhite Sands Corp. Vivian Railway Yard, another local project, which could also be relevant to a cumulative effects assessment.

HC Comment #2: Health Canada notes that sand extraction activities in the local area by the Proponent are reportedly causing public concerns and complaints due to noise and silica dust emissions (as per pg. 15 of the Open House document). This is consistent with the potential for Project-related impacts due to changes in noise and air quality, as indicated previously by Health Canada.

HC Comment #3: The designation request also commented on a lack of consultation regarding potential impacts to Indigenous communities. Detailed information on engagement and the Project's potential interaction with local First Nations and Métis communities has not been provided to date, which was noted in Health Canada's previous comments, and consequently



limited our ability to comment constructively on possible adverse effects to the health of Indigenous peoples.

Health Canada has no additional comments on the current designation request, the Project, or its potential impacts, and refers the Agency to the department's responses to the previous designation requests. Health Canada is not a regulatory body and does not issue any approvals or make any regulatory decisions with respect to development projects. 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.

Should you have further questions regarding Health Canada's comments, please contact Julie Anderson at julie.c.anderson@hc-sc.gc.ca.

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
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