

Thank you for your service on this commission and for the opportunity to speak with you about my own direct experiences living in Springfield, and Hanover and with the team members of Sio Silica. I am a founding member of Our Line in the Sand, but I am speaking here as an individual.

By way of introduction, I am an agricultural consultant with a thirty-year business, run from our co-op farm forest, along a gravel ridge 17 km south of Steinbach here in Hanover. My co op neighbours and myself maintain 8 wells on our 240-acre parcel, 7 sand points and one ~380 ft into the carbonite aquifer. Since 2002 I have led the Pansy Groundwater Committee. We donated many hours and many travel miles to participate in the Southeast Regional Ground Water Management Planning Group to create the water management plan for our area. That plan does not appear to have been consulted by Sio.

I am also a grandmother, mother and auntie and have helped nourish many children to adulthood, and crops to harvest, while assisting neighbours to do the same, personally, and professionally.

In my role as an Organic Verification Officer, I have reviewed water test results for potability for livestock and use in irrigation across Springfield and the concerned municipalities. I have seen a range of high arsenic levels in the yearly tests reviewed, near the allowable potability limits for livestock. Some areas the heavy metal levels in the test results are higher than others in this same general region. My theory is that varying heavy metal counts may be connected to mineral leaching rock reacting to degrees of disturbance.

I was raised just off Saption Road North of Oakbank, attending middle and high school there. My parents purchased a bankrupt broiler production facility in 1966 and turned it into a horse barn and riding area for my family's love of horses. We had constant water issues as what appeared to be orange acid drainage in the water ate through all the plumbing regularly. Pyrite in the sand reacting to oxygen, perhaps? Constant maintenance of the plumbing for the house and barn and well was required to keep water running. This experience made me question Sio's silica purity claims.

That lived experience of the stress of the plumbing along with holding the flashlight for my younger smaller brothers to squeeze down into the well so often for maintenance, is probably a contributing factor as to why I chose to live very simply with walking water instead of running water, at our co-op.

Some colleagues in Springfield told me a commonly used hiking wilderness area just south of Vivian had changed hands and now had piles of uncovered silica over which kids were riding their bikes. I was asked to assist in protecting neighbours in Vivian from the silicosis which even minute exposure to small silica particles can cause. I attended the piles in two locations, seeing no signage at all, I examined the area closely. I am trained in Risk Assessment as a Verification Officer, for Organic Production Standards and any resulting production plans are based on the Precautionary Principle of required safety.

I was asked to speak on CJOB with Mr. Bullen about the Proposed CanWhite Sands, now Sio Silica Mining Project. I asked Mr. Bullen directly on radio, why if they wanted to be responsible neighbours as he said, had they not erected barriers to prevent access, to the potentially dangerous silica piles. He reported they had installed a gate, but it had been stolen by vandals. He stated the piles were covered but the wind had blown tarps off.

I can report I spent some time at the approaches to both properties where the piles were located, and neither showed any ground disturbance of any gate posts installed or removed. Perhaps it was a gate that "hovered" in the air? None of the ground area around the piles had any indication of any pegs, or tarping structure or wind-blown tarp. It did not appear any clean up had been conducted given the debris observed that spring of 2019, but no wind torn tarps were seen.

See Attachment One, photos of bike tracks over the sand piles.

As there was no signage on the property which appeared freely open to the public, and as I am trained in soil and tissue sampling procedures, including maintaining chain of custody forms, I offered to collect sand samples from the silica piles. Our hypothesis was that the sand would have a percentage pyrite, that would require cleaning and would result in creating acid drainage, to be pure enough for technical glass production.

June 7th, 2020, I attended with Mr. Dennis LeNeveu and other colleagues, to collect a variety of sand samples, which we photographed in the collection process and labeled on site with chain of Custody paperwork completed for ALS Labs. The samples remained in my custody until delivered by UPS courier to the proper ALS Labs for analysis in Vancouver BC.

The lab test results indicated the iron pyrite levels, despite the silica having been outside, apparently uncovered for an unknown period of time, were higher than the test results published by CanWhite.

See attached ALS Global Lab Analysis results.

This would cause more expense environmentally and fiscally to address. The public costs would likely far outweigh any private benefits. There is no margin for risk in our drinking water. Mined areas are seldom remediated. It is one of our most environmentally damaging activities which needs more accountability.

With the best of intentions, I make mistakes, occasionally serious mistakes which I strive to immediately rectify. It is hubris to think such a complex proposal involving so many variables as this silica mining in our drinking water, will not show us the gap existing between theory and practise in the natural world.

Aquifers CAN Not BE Remediated! This is our ONLY source of drinking water!

The Sio Silica team are asking for the public trust with our drinking water. To quote Maya Angelou, when someone shows you who they are, believe them. The Sio team has shown me who they are. Their Actual interactions with neighbours has lacked real respect and engagement. Forgiving human mistakes is different than indulging corporate greenwashing of a risky experiment, with potentially devastating, irreversible consequences.

My direct experience of Sio financed ads, about sharing citizen science called spreading misinformation, of concerned neighbours asking for accountability being called thieves and vandals, of the public media greenwashing of a dangerous corporate profit at public expense experiment, makes me wonder at the variety in world views we see around us today. I pray for compassion.

Why is it when we destroy some aspect of Creation, God's creation, it is called Progress, but when one destroys what man makes it is called vandalism?

Are we ready to see we are part of this miraculous Creation, part of our environment, that what we do to our water, we do to ourselves?

Quantum physics has moved us away from Newtonian objectivism, where we can chop up reality and think we see the whole by looking at those chopped parts. We need to see the integrated whole of our reality including the long term impacts of our choices, when we choose to live with integrity. Sio did no long-term impact analysis of their proposal.

This project simply is not capable of being wholly assessed with the existing gaps in the data provided. Further to that it is a demonstration of government regulatory capture that it has proceeded to this point at all. No aspect of the Precautionary Principle, recommended by other CEC Hearings, is being respected with this proposal. Recommend it go no further. Please show you care about water quality and life over temporary profit!

Company Name: Our Line in the Sand

Submitted by: Janine G. Gibson

Telephone: [REDACTED]

Courier/Waybill: _____

Containers: 2

Date Shipped: June 25th, 2020

PO Number: [REDACTED]

Internal Use Only

Date Received: _____

Client Code: _____

Workorder No: _____

Quote: _____

Template: _____

Standard Project: _____

Commodity: Sand, 2 samples-#4 and #7 Ore Trace Potentially Hazardous Materials

Special Instructions: Sample 4 ABA PKG 05; Sample 7 ME-MS61

Sample Type: Rock Pulp Percussion Soil Sediment Drill Core Other _____

Results to

Name: Janine G. Gibson Invoice

Email: [REDACTED] Certificate

Address: [REDACTED] QC Certificate

City: Steinbach State: MB Data File

Country: Canada Zip: [REDACTED] Webtrieve Only

Sample Return

Pulps	Rejects
<input type="checkbox"/> Return after analysis	<input type="checkbox"/> Return after analysis
<input type="checkbox"/> Return after 90 days	<input type="checkbox"/> Return after 45 days
<input checked="" type="checkbox"/> Discard	<input checked="" type="checkbox"/> Discard
<input type="checkbox"/> Paid Storage	<input type="checkbox"/> Paid Storage

Failure to indicate pulp & reject disposition will be considered as paid storage.

Return Address: _____

Attention: _____

Copy to

Name: Dennis Leneveu Webtrieve Only

Email: [REDACTED] Certificate

Data File

Copy to

Name: _____ Webtrieve Only

Email: _____ Certificate

Data File

*All shipments received are subject to inspection upon layout; all services are rendered in accordance with ALS Minerals Terms & Conditions (see the current Schedule of Services & Fees).



Samples ID's		Quantity	Sample Preparation Required (Prep Code)	Analytical (Elements or Method Code)	Check here for Rush Premium Service
Start No.	Finish No.				
#4 sand		200 grams			<input type="checkbox"/> <small>CONTACT THE LAB TO OBTAIN ANALYSIS RESULTS</small>
#7 sand		200 grams			
Total Samples		400			





DATE: 10/10/10
TIME: 10:30
LOCATION: NADIA
SPECIES: SAND
COLLECTOR: JANE L. BROWN



Follow-Up

Part 1 is a
Self-Check Note
Part 2 is a
Follow-Up Note

From: *Vivian North Pl*
Sand #5

Contact/pt#: *GIBSON 207-897-6200*

Sample Description: *Sand for particle size*

Comments:

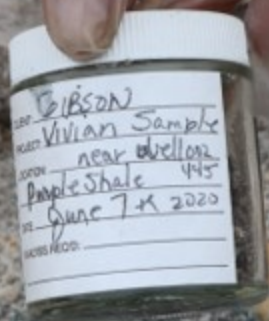
To:

ETL Enviro-Test
LABORATORIES

Note: Please include an analytical
request form or chain of custody

Toll Free #: 1-800-668-9878





GIBSON
Vivian Sample
near Whellon 445
Purple Shale
June 7th 2020
LABOR #000: _____



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To: OUR LINE IN THE SAND

Page: 1
 Total # Pages: 2 (A - E)
 Plus Appendix Pages
 Finalized Date: 17-JUL-2020
 Account: OJITSA

CERTIFICATE VA20137923

P.O. No.: [REDACTED]
 This report is for 2 Sand samples submitted to our lab in [REDACTED] on 29-JUN-2020.

The following have access to data associated with this certificate:

TANZI BELL

JANINE G. GIBSON

DENNIS LENEVEU

SAMPLE PREPARATION

ALS CODE	DESCRIPTION
WEI-21	Received Sample Weight
LOG-22	Sample logIn - Rcd w/o BarCode
PUL-QC	Pulverizing QC Test
PUL-31	Pulverize up to 250g 85% <75 um
SPL-21	Split sample - rifle splitter
DISP-01	Disposal of all sample fractions

ANALYTICAL PROCEDURES

ALS CODE	DESCRIPTION	INSTRUMENT
S-GRA06	Sulfate Sulfur-carbonate leach	WST-SEQ
C-GAS05	Inorganic Carbon (CO2)	WST-SEQ
S-GRA06a	Sulfate Sulfur (HCl leachable)	
ME-M561	48 element four acid ICP-MS	
OA-VOL08	Basic Acid Base Accounting	
S-IR08	Total Sulphur (IR Spectroscopy)	LECO
OA-ELE07	Paste pH	
S-CAL06	Sulfide Sulfur (calculated)	LECO

This is the Final Report and supersedes any preliminary report with this certificate number. Results apply to samples as submitted. All pages of this report have been checked and approved for release.

***** See Appendix Page for comments regarding this certificate *****

Signature:



North Vancouver



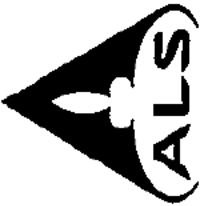
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To: OUR LINE IN THE SAND

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 Account: OLJ TSA

CERTIFICATE OF ANALYSIS VA20137923

Method Analyte Units LOD	VEI-21 Revd Wt. kg 0.02	OA-VOL08 MPA tCaCO3/1kt 0.3	OA-VOL08 FIZZ RAT Unity 1	OA-VOL08 NNP tCaCO3/1kt 1	OA-VOL08 NP tCaCO3/1kt 0	OA-VOL08 pH Unity 8.0	OA-VOL08 Ratio IN Unity 0.01	S-IR08 S % 0.01	S-GRA06 S % 0.01	S-GRA06a S % 0.01	S-CAL06 S % 0.01	C-CAS05 C % 0.05	C-GAS05 CO2 % 0.2	ME-MSG1 Ag ppm 0.01	ME-MSG1 AI % 0.01
#4 sand	0.88	0.6	1	-1	0	8.0	0.00	0.02	<0.01	0.01	0.02	<0.05	<0.2	0.02	0.27
#7 sand	0.92														



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To: OUR LINE IN THE SAND

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CERTIFICATE OF ANALYSIS VA20137923

Method Analyte Units LOD	ME-MS61 As ppm 0.2	ME-MS61 Ba ppm 10	ME-MS61 Be ppm 0.05	ME-MS61 Bi ppm 0.01	ME-MS61 Ca % 0.01	ME-MS61 Cd ppm 0.02	ME-MS61 Ce ppm 0.01	ME-MS61 Co ppm 0.1	ME-MS61 Cr ppm 1	ME-MS61 Cs ppm 0.05	ME-MS61 Cu ppm 0.2	ME-MS61 Fe % 0.01	ME-MS61 Ga ppm 0.05	ME-MS61 Gc ppm 0.05	ME-MS61 Hf ppm 0.1
#4 sand	0.9	10	<0.05	0.01	0.06	<0.02	5.07	0.5	5	0.11	2.0	0.47	0.64	0.05	1.6
#7 sand															

***** See Appendix Page for comments regarding this certificate *****



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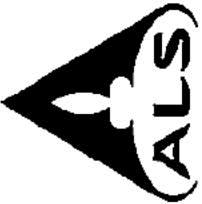
To: OUR LINE IN THE SAND

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CERTIFICATE OF ANALYSIS VA20137923

Method Analyte Units LOD	ME-MS61 In ppm 0.005	ME-MS61 K %	ME-MS61 La ppm 0.5	ME-MS61 Li ppm 0.2	ME-MS61 Mg %	ME-MS61 Mn ppm 5	ME-MS61 Mo ppm 0.05	ME-MS61 Na %	ME-MS61 Ni ppm 0.1	ME-MS61 Pb ppm 0.5	ME-MS61 P ppm 10	ME-MS61 Ru ppm 0.1	ME-MS61 Re ppm 0.002	ME-MS61 S %
Sample Description	#4 sand	0.07	2.6	6.7	0.02	47	0.13	0.01	0.7	1.6	40	2.1	<0.002	0.01
	#7 sand													

***** See Appendix Page for comments regarding this certificate *****



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CERTIFICATE OF ANALYSIS VA20137923

Method Analyte Units LOD	ME-MS61 Sb ppm 0.05	ME-MS61 Sc ppm 0.1	ME-MS61 Se ppm 1	ME-MS61 Sn ppm 0.2	ME-MS61 Sr ppm 0.2	ME-MS61 Ta ppm 0.05	ME-MS61 Te ppm 0.05	ME-MS61 Th ppm 0.01	ME-MS61 Tl % 0.005	ME-MS61 Tl ppm 0.02	ME-MS61 U ppm 0.1	ME-MS61 V ppm 1	ME-MS61 W ppm 0.1	ME-MS61 Y ppm 0.1	ME-MS61 Zn ppm 2
#4 sand #7 sand	0.07	0.3	1	<0.2	5.1	<0.05	<0.05	0.82	0.037	0.02	0.5	2	0.1	2.0	3

***** See Appendix Page for comments regarding this certificate *****



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CERTIFICATE OF ANALYSIS VA20137923

Sample Description	Method Analyte Units LOD	
#4 sand #7 sand	ME-MS61 Zr ppm 0.5	70.9

***** See Appendix Page for comments regarding this certificate *****



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To: OUR LINE IN THE SAND

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Account: OLITSA

CERTIFICATE OF ANALYSIS VA20137923

CERTIFICATE COMMENTS

ANALYTICAL COMMENTS

REEs may not be totally soluble in this method.
ME-MS61

LABORATORY ADDRESSES

Processed at ALS Vancouver located at
C-GAS05
OA-ELED7
S-CAL06
SPL-21

ME-MS61
PUL-QC
S-IR08

LOG-22
PUL-31
S-GRA06a

Applies to Method:

Applies to Method: