

DATE: February 5, 2024

TO: Public Registry

FROM: Jennifer Winsor, P. Eng.  
Senior Environmental Engineer  
Environmental Approvals Branch

**SUBJECT: File 1906.50 – TANCO Tailings Reprocessing Facility Project – Information for Public Registry**

Please find attached the public and Technical Advisory Committee (TAC) correspondence related to the TANCO Tailings Reprocessing Facility Project (File No.1906.50) for distribution to the public registries. The documents included are:

No.	Public Comment
1.	Adair Libbrecht
2.	Angie Jimenez
3.	Angie Libbrecht
4.	Barry Lucyk
5.	Blaine and Anita Werbowski
6.	Bob and Val Poole
7.	Brett Malkoske
8.	Janet Dufprat
9.	Brian Smiley
10.	Bryan Klinkhammer
11.	Cale Timlick
12.	Carlene Strand
13.	Cassandra Phung
14.	Cat Gauthier
15.	Cheryl Thorlakson
16.	Corbin Libbrecht
17.	Aaron Wiebe

18.	Danielle Lucyk
19.	D'Anna Routley and Felix Sikora
20.	David Oakley
21.	Derek Dupley
22.	Diane Aubin
23.	Glen Kowalchuk
24.	Greg Libbrecht
25.	Hank and Marion Krueger Bruce and Rachelle Mariash Jim and Shirley Halpenny Bryan and Tara Weiss
26.	Heather Routley
27.	Jason Wagner
28.	Douglas and Catherine Geddes
29.	James Nazer
30.	John and Kristine Watts
31.	John Kun
32.	Keli Hutton
33.	Kelly
34.	Kirsten Dupley
35.	Robert and Laura Skabar
36.	Heather Fast, J.D., LL.M. Dr. Patricia Fitzpatrick
37.	Martin Enns
38.	Mike Hlady
39.	Nolan Libbrecht
40.	Paul Lucyk
41.	Roger Aubin
42.	Spencer Libbrecht

43.	Stephanie Roesler
44.	Steve and Jody Reaburn
45.	Susan Geddes
46.	Suzanne Phung
47.	Tab Harrop
48.	Tiffany Skomro
49.	Tyler Lucyk

No	Technical Advisory Committee Member	Response Provided
1	<b>Environment and Climate Change</b>	
	Environmental Approvals Branch	
	<ul style="list-style-type: none"> <li>Air Quality Management</li> </ul>	
	Environmental Compliance and Enforcement Branch	
	<ul style="list-style-type: none"> <li>Regional Office</li> </ul>	January 4, 2024
	Office of Drinking Water	November 30, 2023
	Environmental Programs and Remediation Branch	
	Drainage and Water Rights Licensing Branch	December 8, 2023
	<ul style="list-style-type: none"> <li>Water Use Licensing Section</li> </ul>	December 6, 2023
	Water Science and Watershed Management Branch	
	<ul style="list-style-type: none"> <li>Water Quality Management Section</li> </ul>	February 1, 2024
	<ul style="list-style-type: none"> <li>Groundwater Management Section</li> </ul>	
	Climate Change and Clean Technology	
	Parks Branch	
2	<b>Economic Development, Investment, Trade and Natural Resources</b>	
	Wildlife and Fisheries Branch (wildlife)	
	Wildlife and Fisheries Branch (fisheries)	
	Forestry and Peatlands Branch	January 5, 2024
	Lands and Planning	
	Crown Land Specialist	
	Mines Program	December 21, 2023
	Petroleum Program	
	Lands Branch	
3	<b>Sport, Culture, Heritage and Tourism - Historic Resources Branch</b>	December 29, 2023
4	<b>Municipal and Northern Relations</b>	
	Community Planning Branch	December 13, 2023
	Office of the Fire Commissioner	
5	<b>Labour and Immigration - Inspection and Technical Services</b>	

6	<b>Transportation and Infrastructure</b> - Environmental Services and Consultation Branch	
	Highway Design Branch – Roadside Development Section	December 29, 2023
7	<b>Health, Seniors and Long-Term Care</b> - Winnipeg	December 29, 2023
8	<b>Impact Assessment Agency of Canada</b>	

**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp

Hi Jennifer,

I am emailing in regards to the tantalum mining corp's proposal to construct a mill mining the chemical cesium. This mill will directly pollute the water that my family swims in every single summer. Our family cottage is located on Bird river and has been in the family for 3 generations. By allowing this mill to operate my family will no longer be able to enjoy activities like swimming, paddle boarding, kayaking, tubing and much more that we look forward to every summer.

Please stop this from moving forward and help keep my families memories going for future generations!

Thank you,  
Adair Libbrecht

**Winsor, Jennifer**

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**Subject:** FW: Urgent Appeal to Save Our Summer Oasis

Hey Ms. Jennifer Winsor,

I hope this message finds you in good spirits. I need to talk to you about something that's been weighing heavy on my heart. You see, I've spent every damn summer floating and swimming in the pristine waters of Bird River in Eastern Manitoba – it's my little slice of paradise.

Now, cesium mining by TANCO threatening to dump irreversible pollution into our beloved Bird River. That's a game-changer for us New Yorkers who look forward to these summer getaways. I'm not talking about just any pollution; I'm talking about a threat to our summer traditions.

Picture this: the sun beating down, laughter echoing, and the water under me while I float. But with the looming pollution, that image is fading fast. The thought of losing this haven breaks my heart.

I get it – progress, jobs, and all that jazz. But can't we find a way to make a living without killing the soul of our summers? It's more than just chemicals; it's memories, laughter, and the simple joy of floating without a care in the world.

Please, let's rethink this. We can't put a price on memories, and once they're gone, they're gone. Don't let TANCO turn our summer dreams into a polluted nightmare.

Best,

Angie Jimenez

**Winsor, Jennifer**

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**Subject:** FW: Tantalum mining

Hello

I just want in writing my opposition to the tantalium mine in Lac du Bonnet. I am opposed to the environmental air and water pollution it will be causing to my home and water system.

Angie Libbrecht

Sent from my iPhone

**Winsor, Jennifer**

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**Subject:** FW: Proposed TANCO MINE expansion project at Bernic Lake.

Hello,

I am a long time (30+years) cottage owner at [REDACTED].  
Myself and my two adult children and their families (at least 3 vehicles in total) regularly travel PH 315 to get to our cottage at [REDACTED]. On average it would say we each (3 families) make at least 25-30 round trips to the cottage each year.

I am concerned about the planned expansion of the TANCO mine at Bernic lake.

I know that TANCO has owned and operated the Bernic Lake Mine since 1967 and been a fixture in the community since that time. With their proposed expanding operations and continued occupancy in the area, steps to address the degrading infrastructure in the surrounding area must be taken prior to any expansion approval.

In particular, provincial highway 315 (PH 315) has been utilized by the company for many years as the primary access to the mine site and to transport ore obtained during operations. Due to the increased traffic caused by the mine, the decline in road conditions from the paved portion of PH315 at Bird River to the Bernic Lake Mine access road has gotten to a point where there are serious safety concerns when travelling this portion. Large pot holes, temporary patch jobs on water crossings, and large tire ridges, pose a risk to vehicle integrity and human health.

With the increase in bulk trucks, required for the expanded operations, that will be transferring materials to and from the mine, the road will soon be beyond repair and will not be able to be used by either the mine or surrounding community.

Should the project move forward, I believe TANCO should be required to pave PH 315 from the Bernic Lake Mine access road to the paved portion at Bird River to minimize any safety risk within this area. The paved road will provide adequate integrity to support the increased traffic and bulk trucks. It would also demonstrate to TANCO's neighbours and surrounding communities that these serious concerns are not taken lightly by the company.

Thank you for taking into consideration my families' concerns for their safety seriously.

Barry Lucyk  
[REDACTED]

**Winsor, Jennifer**

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**Subject:** FW: Highway 315 Bird River to the Tanco mine

Hoping Tanco will be maintaining the road during expansion. They have not maintained the road in the past and its often in very poor condition and dangerous.

When you live out at Bird Lake you depend on this highway.

Sent from my Galaxy

[REDACTED]

Ms Jennifer Winsor  
Senior Environmental Engineer

Re: Road Conditions PR#315 now and with proposed Tanco Mine increased traffic

We have a cottage in [REDACTED] which is on the Manitoba/Ontario border. We use the gravel road PR#315 from Bird River which used to take us about 35 minutes on that section of highway. Over the past five years the condition of the road has deteriorated considerably, with large potholes and deep tire tracks on every trip, especially on the stretch from Bird River to the Tanco Mine turnoff. Our speed on the road is now 50 kmh as we navigate the holes which are often right across the road and we allow ourselves 60 minutes to drive the gravel portion of PR#315.

We read that Tanco Mine is moving forward with operations that will see 125 vehicles on the road each day starting in 2023. As the public has been invited to share our concerns with you, please consider the following areas and hopefully work can be done on PR#315 before the increase in traffic happens.

To start with, there is a narrow bridge at Bird River over the water where it meets the gravel road that has a big one in the centre area. Highways tries to patch it with asphalt only to have it disappear the same year. There are several more large holes now that cannot be avoided without moving over into the other lane on this narrow bridge, and when two vehicles pass each other one has to stop to allow the other room to avoid a hole.

Both of the approaches to the bridge always need to be built up, making it very uneven and requiring vehicles to slow down to avoid damage with the bumps created there.

There is another bridge just a couple of minutes down the gravel road that has been replaced and repaired in the past few years. It was fixed yet again as the approaches from each direction sank and caused a very big ridge on either end. The joining of the concrete sections of the new bridge also shifted which caused large ridges right on the bridge itself and these were patched with asphalt, which is not going to last very long.

The gravel road of PR#315 is never in great shape and is especially rough in the spring time. The road is built on swamp/muskeg and when the ground is trying to freeze the moisture creates large potholes that force drivers to slow down to as low as 30 kmh in certain areas. The holes often go right across the road and we can see no way to drive forward without our wheels sinking into one or more of them. We can see large tire tracks from heavy trucks that moved over to the side, and were lucky to not get stuck. Many cars and smaller SUVs/trucks are not so lucky.

This road condition usually continues from March until June many years depending on the freeze/thaw of the weather, and add to that some rainfall to keep the road mucky. In 2023 we have had a very warm fall/winter season and the road is the worst it has ever been due to the temperatures around zero and no heavy freezing taking place. The section of highway from the bridge to Tanco is one of the worst spots for potholes and uneven roads.

The Department of Highways apparently grades the gravel road once a week no matter what the weather. That is definitely not often enough for the stretch of road from the Bird River to Tanco right

now, and with the anticipated increase in vehicle traffic, much of it heavy trucks, the road will not be even passable for regular vehicles and will be considerably damaged with more traffic using it. Highways informed us that they only have a budget for once a week grading, and the process does not fill the potholes, so it is definitely not an effective solution to keeping the road safe for driving on.

Overall, we can see there will be considerable damage to pleasure vehicles trying to access Nopiming Park. Parks is trying to increase the use of our park but people already coming to Nopiming know the gravel road is always in poor shape and are hoping for better roads, nor worse. Everyone does not own a truck and the cars and SUVs on the road already have a tough time navigating that section of highway.

We use our cottage quite a lot, in all seasons, not just summer. Most of the cottages are now insulated for use in all months of the year. There are a number of permanent residents who live at the various lakes in Nopiming Park and make weekly trips to Lac du Bonnet. Nopiming Lodge also operates yearly and renters travel the gravel road every day of the year to get there. The SnowMads snowmobile club headquarters is at Bird Lake and there are many riders from around the province who come to that area, as well as those to their own cottages, to skidoo during the winter months. We all have holding tanks so there are many trips from pump out providers coming from Lac du Bonnet in the winter months as well as all year long. No matter what season Tanco puts their heavier trucks on the road, there will be other traffic using the gravel highway and the wear and tear will continue to deteriorate the road conditions all year long.

We do understand that Tanco is expanding their business and believe that nobody has an issue with that. Our main concern is that the gravel road PR#315 was originally a trail through the bush and was upgraded to allow for some recreational cottage/lodge/fishing/camping traffic to use it. It was built on muskeg/swamp and was never meant to handle large mining vehicles, transporting of large equipment on flatbeds, or increased mine traffic.

The government should be addressing these issues with Tanco and also Manitoba Highways to look at what can be done before all of this new traffic hits the road. Upgrading of the road base has been discussed before with Highways and their comments have been that there is no money. Parks says they are not responsible for the condition of the highway. Perhaps with Tanco now expanding there could be some discussion between the various parties involved to deal with the issue of the bridges and the road conditions. The road is in poor shape for 12 months of the year now with climate change bringing us warmer temperatures in the winter months so there will definitely be more damage done as the road base is not frozen solid from November to March any longer. There may even have to be discussions about paving the road from Bird River to the Tanco Mine turnoff as we noted Tanco's year-to-end-processing timeline has no definite end to it depending on what the need is for their product. One can only imagine the condition of the road 10 or 20 years from now if no upgrades are done.

Thank you for taking the time to consider our concerns.

Bob and Val Poole

[REDACTED]

Davidson Lake

[REDACTED]

## Winsor, Jennifer

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**Subject:** FW: Tanco Mine Expansion

**Importance:** High

Ms Winsor,

We have a cottage at [REDACTED], which we frequent 7 or 8 months of the year. The proposed increase in truck traffic to the Tanco mine at Bernic Lake is concerning on a number of fronts for me and my family, most notably its impact on the road conditions on PR#315. We have previously expressed our views of the Road to the Government, and our Cottagers Association has likewise expressed its dismay on current road conditions. The road can be incredibly dangerous, and is perpetually in poor condition without the added truck traffic. Common issues include:

- Excessive dust from the Bird River bridge on the gravel especially during dry months that greatly reduces visibility on a well used and very windy gravel road
- Heavy ruts, pot holes, and washboard conditions that exist throughout the year in spite of grading efforts (which have been inconsistent in the past), which are very hard on vehicles and trailers that need to travel on the road
- Poor bridge conditions on the new bridge just north of the Bird River

We have experienced several "close calls" on the road already and know other cottagers that frequent the road have the same experiences. A tenfold increase in truck traffic is going to significantly worsen the conditions of PR#315 making it more dangerous to travel on. We would respectfully request that should the expansion be allowed to go through, that Tanco be made to significantly upgrade the road to the mine turn off to ensure the safety of the public and no further degradation in road conditions. Given how hard the trucks are on the surface of the road at present, it would make sense that the road is paved to that point to ensure road integrity. This work must be completed in advance of any expansion coming online. The cost of roughly 10km of pavement, should be an acceptable and affordable development cost for the mine owners.

Would also ask as strongly as possible that the strictest environmental rules and regulations be adhered to in the mine expansion, road work, and eventual decommissioning to preserve one of the most beautiful parts of the province.

Respectfully,

Brett Malkoske

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**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) - Tailings Reprocessing Facility Project - File: 1906.50

Dear Jennifer Windsor,

I own a [REDACTED] which has been in my family for 64 years so have travelled the gravel section of Hwy. 315 for many years! As we go to the cottage throughout the year as do many of our family members, we make many trips on that gravel road.

I am writing as I am greatly concerned about the proposed expansion to the TANCO processing facility at Bernic Lake, as the mine uses Manitoba Hwy. 315 for all of the vehicle traffic both in and out of the mine site.

Highway 315 is the main route to Nopiming Provincial Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake, Long Lake) for cottages, campers, and recreational users. This highway is a gravel road that is often in very poor condition, full of ruts and pot holes at the best of times, as it is only graded once a week.

The large increase in the number of trucks that will be using Hwy. 315 from the turn-off from the mine to the beginning of the paved road at Bird River will certainly make a bad situation even worse if the proposed expansion goes through. It is predicted that there will be nearly four times as much truck traffic which is a concern.

Please consider having TANCO contribute to highway improvements/ upgrades to Hwy 315 preferably by paving the gravel portion of the route these trucks will use on a daily basis to keep all travellers on the road safe.

Janet Dufrot  
[REDACTED]

**Subject:** FW: Tantalum Mining Corp

## **Notice of Environment Act Proposal**

Manitoba Environment and Climate Change invites public comment on the following proposal:

**TANTALUM MINING CORP. OF CANADA LTD. (TANCO) –  
TAILINGS REPROCESSING FACILITY PROJECT –  
File: 1906.50**

Tantalum Mining Corp. of Canada Ltd. (TANCO) proposes to construct and operate a new 3000 tonnes per day mill, concentrate loadout building, ore storage pad, and additional supporting infrastructure located on the existing TANCO mine site in Section 15-16-15 EPM in the R.M. of Lac du Bonnet.

**Anyone likely to be affected by the proposal and who wishes to comment, should contact Jennifer Winsor, Senior Environmental Engineer in writing or by email at [Jennifer.Winsor@gov.mb.ca](mailto:Jennifer.Winsor@gov.mb.ca) no later than January 6, 2024. Further information is available from the Public Registry: [www.gov.mb.ca/sd/eal/registries](http://www.gov.mb.ca/sd/eal/registries)**

Information submitted in response to this proposal will be available to the proponent and placed on the public registry per Section 17 of The Environment Act

**Environmental Approvals Branch  
Manitoba Environment and Climate Change  
Box 35, 14 Fultz Boulevard  
Winnipeg MB R3Y 0L6  
Toll-Free: 1-800-282-8069  
Fax: 204-945-5229  
Website: [www.gov.mb.ca/sd/eal/registries](http://www.gov.mb.ca/sd/eal/registries)**



Jennifer Winsor,

I'm the past-president of the Bird River Cottage Owners Association and our membership has many concerns about the impending project proposed by Tanco (re: notice above).

A sampling of our questions are:

- Has an enviro impact scan been completed? Water. Air. Wildlife
- What will be the hours of operation?
- What steps are being taken to ensure road safety, due to to increased traffic levels
- What impact/financial cost will be taken when the Bird River Bridge (an aging infrastructure) needs repairs?

We look forward to discussing these concerns to your committee/group. You can reply to me via email, or cell [REDACTED]

Regards,  
Brian Smiley

CC: Carlene Strand (acting president BRCOA)

**Winsor, Jennifer**

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**Subject:** FW: Bird River

We are cottage owners who winter down south. We do not return until the end of April. There would be many more people who do the same.

We are very concerned with the proposals that are being presented.

Our property is very important to us. We are also concerned about the value of our property.

There should be meetings with property owners to discuss the impact

Thank you

Bryan Klinkhammer

[REDACTED]

[REDACTED]

**Winsor, Jennifer**

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**Subject:** FW: Tanco mine expansion and traffic on 315

Hi Jennifer,

Im sure that you have recieved many of the same message by now from nopiming cottagers, but i would like to reiterate the below message.

I appreciate your consideration onto the below comments.

I am a [REDACTED], we have been travelling the gravel portion of 315 for 3 years and on average we make 10 round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake, Beresford Lake and Long Lake) for cottagers, campers, and recreational users.

It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,

Cale Timlick

January 6, 2023

RE: TANCO - Tailings Reprocessing Facility Project File 1906.50

To: Jennifer Winsor, Senior Environmental Engineer

On behalf of the Bird River Cottage Owners Association I would like to express concerns regarding the TANCO Proposal.

The Province of Manitoba should not approve a project of this magnitude until some of the unknown processes have been determined.

TANCO has not yet determined the treatment measures to manage the increase in effluent - and process involved if it is not within limits.

The structural integrity of the Bird River bridge is already in question by residents and cottage owners - as well as the current condition of the gravel road on the other side of the bridge - Manitoba Transportation and Infrastructure should be consulted.

Increased traffic, safety, noise, impacts to environment, wildlife and water bodies all need to be considered both during and the lasting impacts after.

Residents and cottage owners that have enjoyed the natural beauty of Bird River for the last several decades should be able to continue to do so safely, and peacefully for decades to come.

Thank you for taking our concerns into consideration.

Carlene Strand  
BRCOA President

## Winsor, Jennifer

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**Subject:** FW: Urgent Concerns Regarding Tanco Mine Expansion and Road Conditions

Dear Jennifer Windsor,

I hope this email finds you well. My name is Cassandra Phung, a concerned member of the Davidson Lake community. I am writing to express serious concerns regarding the proposed expansion of the Tanco Mine and the consequent impact on local infrastructure, particularly the road conditions, which have negatively affected the accessibility and safety for park go-ers, campers and for the cottagers.

As detailed in recent discussions on the South Nopiming Facebook page, and highlighted by informed individuals like Doug Holmes, the expansion of the Tanco Mine is expected to significantly increase heavy vehicle traffic. This increase poses a direct threat to the already deteriorating condition of the roads, especially the bridge over Bird River at the beginning of Highway #315's gravel section and the new bridge repaired a few years ago. Both bridges have shown alarming signs of wear, with recurring large holes and compromised concrete slabs.

Furthermore, the gravel portion of PR#315 leading to Tanco is chronically plagued by potholes and tire ridges, worsened by seasonal changes and insufficient maintenance. This fall's warmer weather has kept the muskeg underlay from freezing, exacerbating the situation to a spring-like road condition year-round. The weekly road grading is proving inadequate, necessitating more frequent maintenance which is not being provided.

The surge in heavy vehicle traffic will not only accelerate the degradation of these roads but also jeopardize the safety of regular vehicles traveling north towards Nopiming Park. We aim to attract visitors to our provincial park, but the poor road conditions are a significant deterrent.

Given the substantial investments and profits associated with the Tanco Mine, I propose that consideration be given to paving the road from Bird River to the mine turnoff. Alternatively, upgrading the highway's base to support heavy truck weight in all seasons would be a practical solution.

I, along with my fellow cottagers, am deeply concerned about the impact of this expansion on our community. Our cottages, including mine at Davidson Lake, are reliant on these roads for access. The frequent trips (approximately 50 round trips annually in my case) are becoming increasingly challenging and hazardous due to the road conditions.

I urge you to consider these concerns and take necessary actions to ensure the safety and accessibility of our roads. I hope that our voices will be heard and acted upon promptly.

Thank you for your attention to this crucial matter.

Sincerely,

Cassandra Phung

Davidson Lake Community Member

**Winsor, Jennifer**

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**Subject:** FW: FILE 1906.50

RE: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

Hello,

My name is Cat Gauthier, we have a [REDACTED] and have been deign the gravel portion of 315 for 30 years and we average 25 round trips per year, plus our guests who come to the lake every weekend. The gravel portion of 315 has never been worse in the last 30 years.

I'm writing to express our concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson and Black Lakes) for cottagers, campers, and recreational users.

It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes. Our boat trailer axle has had to be repaired the last two summers because of the state of the gravel road.

The road is graded once a week but with climate change affecting the weather/seasons it isn't graded enough.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

Please consider having TANCO contribute to highway improvements/upgrades such as paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,  
Cat Gauthier

**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

Hello, I am a cottager at Booster lake and we have been travelling the gravel portion of 315 for 17 years and on average we make approx 50 plus round trips on 315 per year. I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site. Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson and Black Lake) for cottagers, campers, and recreational users. It is a gravel road that is often in very poor condition at the best of times. The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse. As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes. It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks. The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough. Furthermore the gravel has all but worn away so grading does little to address the poor state of the road conditions. Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,

Cheryl Thorlakson

**Winsor, Jennifer**

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**Subject:**

FW: AGAINST Birdriver Proposed pollution

I am strongly against the proposal of mining for the chemical cesium in the Eastern Manitoba Mine owned by TANCO. I have grown up in Birdriver fishing, doing water sports and swimming. I still do all of those items with my own family now.

For the mine to carry forward with mining they would have to dump pollutants into Birdriver which would be irreversible damage. In doing so my family would not be able to continue spending time/ enjoying the water at Birdriver. I am 100% AGAINST the mining!

Thank you,  
Corbin Libbrecht

**Winsor, Jennifer**

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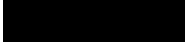
**Subject:** FW: Tanco Discharge Questions (Public Registry File 1906.5)

Hi Jennifer,

1. Has the mine ever failed an MDMER effluent test at the final discharge point? Or been given an exemption?
2. The waters of Bernic Lake are adjacent to mining activities that could have affects on the lake (and downstream waterbodies/users) other than just from the discharged effluent. Does the mine test anywhere aside from the final discharge point?
3. If so, where and how often? If not, why not?
4. If so, have these tests ever failed or been exempted?

Thank you.

--

Aaron Wiebe  
  
Uncut Angling

**Winsor, Jennifer**

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**Subject:**

FW: Proposed expansion of TANCO mine at Bernic Lake

RE: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

Hello,

I am a [REDACTED], we have been travelling the gravel portion of 315 for 7 years and on average we make 30 round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for cottagers, campers, and recreational users.

It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,  
Danielle Lucyk

[REDACTED]

Dear Jennifer Winsor

I am writing to you to express my concern over the expansion of the Tantalum Mining Corporation.

On page 24 of the document “The water management system will operate in a similar manner to the current operation” How is this possible with an increase of 4,000tpd production? Pages 24-25 also go on to “work on going to identify polymer” When will these results be known?

Several of my neighbors on the Bird River have outlined concerns for First Nations Communities, Road stability, as well as concerns for the habit with the increase of Phosphorus levels. My husband and I share these concerns and hope that your department will look further into these concerns.

The Bird River was first flooded in the 1950’s to make room for progress in the field of energy, hydro energy. Although I see the need for progress in battery technology and the world wide need for lithium concentrates, I hope your office will, as our governmental representative, investigate further the concerns outline by the property owners along the Bird River, Bird Lake and surrounding area.

Thank you, D’Anna Routley and Felix Sikora

[REDACTED]

Bird River

[REDACTED]

[REDACTED]

**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

RE: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

Hello,

I am a [REDACTED] we have been travelling the gravel portion of 315 for [16 years] and on average we make [40] round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson and Black Lake) for cottagers, campers, and recreational users.

It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,

Regards  
David Oakley

[REDACTED]

**Winsor, Jennifer**

---

**Subject:** FW: Tantalum Mining increased traffic on highway 315

Jennifer:

From: Derek

RE: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50 Hello, I am a [REDACTED] ke and we have been travelling the gravel portion of 315 for 17 years and on average we make approx 50 plus round trips on 315 per year. I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site. Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson and Black Lake) for cottagers, campers, and recreational users. It is a gravel road that is often in very poor condition at the best of times. The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse. As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes. It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks. The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough. Furthermore the gravel has all but worn away so grading does little to address the poor state of the road conditions. Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis. Thanks,  
Derek Dupley

**Winsor, Jennifer**

---

**Subject:**

FW: Tantalum Mining Corp of Canada Ltd. (TANCO) - Tailings Reprocessing Facility  
Project File: 1906.50

Hello, I am a [REDACTED], we have been travelling the gravel portion of 315 for [18 years] and on average we make [312] round trips on 315 per year. I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site. Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for cottagers, campers, and recreational users. It is a gravel road that is often in very poor condition at the best of times. The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse. As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes. It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks. The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough. Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis. Thanks, Diane Aubin cottage owner.

**Winsor, Jennifer**

---

**Subject:** FW: Tantalum Mining Corp (TANCO) Tailings Reprocessing Facility

Hello Jennifer Winsor,

Kindly provide the details and status of this Tailings Reprocessing Facility project.

I am likely affected by this project as I drink the water and live on Bird River.

I am strongly opposed to any tailing project that drains indirectly into the Bird River Lac du Bonnet water system.

What steps have been taken to ensure no contamination will occur.

Thank you for your attention,

Glen Kowalchuk



**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corporation

Good Evening, Jennifer

I am writing to express my extreme concern over the possibility Tantalum Mining (Sinomine Resource Group) might possibly be approved to drain Bernic Lake to extract more cesium from the mine on that location.

It is my understanding this will release pollution into the Bird River which in turn flows into Winnipeg River. This would expose hundreds of families to the pollutants introduced to the water system.

We have made the Bird River and surrounding area our year-round second home for over 47 years for three generations of family. We have co-existed with the mine for many years without much concern of polluting the forest land and water system. One of the most appealing aspects of the spending time in the Bird River area is our ability to enjoy the natural beauty of the landscape, and interact with many different animals, birds, and fish daily.

Introducing open-pit mining would completely change the this to extreme concern for the environment, people, animals, and fish in the area.

As an entrepreneur, I understand the value of cesium to producing a variety of end products. Mining the precious metal needs to be done in an environmentally benign and responsible manner.

Thank you for your support in advance.

Greg

**GREG LIBBRECHT, MBA**

**President, Platinum Business Services**



Jennifer Winsor  
Senior Environmental Engineer  
Environmental Approvals Branch  
Manitoba Environment and Climate Change  
Re: File 1906.50

December 28, 2023

Dear Ms. Winsor.

Thank you for the opportunity to comment on the proposed expansion of the Tanco mines operation. There are a lot of environmental factors at play but I'll focus on the more localized ones as opposed to the broader quasi-political factors. I hope this consultation isn't just a paper exercise and that approval isn't a foregone conclusion (with statements such as, "*assumes the new mill will be operational Q2 2024*" (Table 3-2))

In the Tetra Tech Canada proposal, if you just read the Executive Summary, it looks like a great idea: allow processing of ore during the winter months and reprocess existing tailings from the West Tailings Management Area (WTMA). It sounds environmentally responsible.

However, when you start to dig into the report, other factors emerge. A few fundamental questions about the proposed new mill:

- Will the size/input of the WTMA increase or decrease?
- Will there be more fresh water consumed or less?
- Will the discharge into Bernic Lake increase or decrease?
- Will there be more air pollution or less?
- Will there be more heavy truck traffic or less?

#### **WEST TAILINGS MANAGEMENT AREA (WTMA)**

Table 3-2 is a little cumbersome to get through, but essentially the net increase to spent tailings will increase over the 7-year period by 1,174,935 tonnes.

TONNES	
-3,960,000	Existing tailings reclaimed from WTMA
2,494,800	Reprocessed tailings re-entering WTMA
960,000	Existing Mill tailings entering WTMA
2,640,135	New Mill tailings entering WTMA
<u>2,134,935</u>	Net total tailings entering WTMA
-960,000	Existing Mill tailings entering WTMA
<u><u>1,174,935</u></u>	Net increase in tailings entering WTMA

Compared to the existing mill tailings entering the WTMA over the 7-year period, this represents a **122% increase**.

### FRESH WATER SUPPLY

In Section 3.2.5, it states that the New Mill’s estimated fresh water supply requirement will be approximately 3.5 m<sup>3</sup>/hr for tailings reprocessing and 1.5 m<sup>3</sup>/h for the ore processing. Convert that to litres per year and, over the 7-year period, you have a **new freshwater requirement of 306,803,448 litres**. That seems like a lot of water.

### EFFLUENT DISCHARGE

In Section 3.2.8, it states that, “*the subsequent mine effluent discharge rate will not increase at the same escalation rate as tailings production*”. So, that means if tailings entering the WTMA would increase by 122%, then the mine’s effluent **discharge would be somewhat less than 122%**. I’m not sure I should be heartened by that.

Furthermore, indeterminate / obtuse statements such as the following cause added concern:

*“Due to the increased production capacity, the rate of tailings slurry deposited into the WTMA will increase approximately six-fold”; and*

*“The New Mill relies on a high rate of internal process water recycle which may potentially “cycle up” (i.e., increase) contaminant concentrations in the WTMA tailings pond and polishing pond.”*

## AIR EMISSIONS

Table 4.2 reports on various Greenhouse Gas Emissions (Carbon Dioxide, Methane, Nitrous Oxide, etc.) for 2011-2021. The average Greenhouse Gas Emissions over this 10-year period is 5,211 tonnes per year. Unfortunately, the proposal doesn't extrapolate the emissions based on the increased capacity associated with the new mill. However, given that Section 3.0 states an increase of, "*daily production rates from 1,000 tpd to 4,000 tpd*", it would be reasonable to assume that **air emissions would also increase four-fold, from 5,211 tonnes per year to 20,844 tonnes per year.**

## TRAFFIC RATES

There's a note in Section 3.4.2 that "*During operation, concentrate transport and local vehicles will result in minor (<10%) increases in traffic.*" That's misleading because it includes a reduction in local, small vehicular traffic that is due to the move of the Tanco office from the Tanco site to Lac du Bonnet. It's the increase in large truck traffic that's germane to the issue. Table 3.3 shows concentrate transport from the site to Winnipeg **increasing from the current weekly rate of 38 trucks to a proposed rate of 125 trucks (230% increase).** If we assume that these same trucks return to the mine site empty, **the increase would double to 460%.**

Given that Highways 315 and 313 are narrow, have poor shoulders, and cross over ill-maintained bridges (i.e., the Bird River bridge with its gaping rust holes), I'm not convinced that increasing large truck traffic by 200%+ or 400%+ is a safe or wise idea.

## CONCLUSION

I can understand progress and development, but I also appreciate environmental stewardship and quality of life for the residents around industrial operations. If the project goes forward, the project will:

- increase tailings volumes by 122%

- increase freshwater requirements by 306,803,488 litres
- increase effluent discharge by ~ 120%
- increase toxic air emissions by 400%
- increase heavy truck traffic by 460%

It becomes a matter of incremental costs vs. incremental benefits. In this case, I don't think the benefits outweigh the costs. Also, in terms of environmental stewardship, let's not forget that Sinomine Resource Group recently suggested that Bernic Lake could be drained entirely to capture the minerals within it. Perhaps that's easy to say for a Chinese company that is operating in Canada.

(<https://www.cbc.ca/news/canada/manitoba/sinomine-tanco-expansion-manitoba-1.6897808>)

Based on these facts, my wife and I, along with the neighbours noted below, as well as many other residents in the Lac du Bonnet, Bird River, and Nopaming Park areas are opposed to the development being proposed by the Sinomine Resource Group.

Thank you for your consideration.

Hank and Marion Krueger,  
Bruce and Rachelle Mariash,  
Jim and Shirley Halpenny,  
Bryan and Tara Weiss  
Ledin Road  
Lac du Bonnet, MB

cc:

Mac Kinghorn, Councillor, RM Alexander  
Wayne Ewasko, MLA, Lac du Bonnet  
James Bezan, MP, Selkirk–Interlake–Eastman  
Wab Kinew, Premier, Manitoba

**Winsor, Jennifer**

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**Subject:**

FW: File 1906.50 - Tanco Notice of Proposal

Good morning Jennifer

I am writing in response to the above proposal of the expansion of the Tanco Mine. I apologize for the late response, however we were not given a lot of notice.

I sincerely hope this is a true consultation process and the expansion isn't a done deal. I found the report a long and cumbersome read and perhaps it is designed that way so people without scientific backgrounds can't make any counter points.

I am concerned about the proposed expansion for many reasons.

- in the spirit of Reconciliation it is imperative any discussions about expansions to the Tanco Mine site MUST be addressed with ALL First Nation Communities surrounding the area - this is non-negotiable! Canada has already done sufficient damage to the relationships with First Nation and Treaty People - Do not let the Tanco mine do more damage in this regard.

- Highways 313 & 315 are already in poor condition with no shoulders, HWY 315 after the Bird River Bridge is gravel and already in washboard condition; the bridges are deteriorating rapidly, specifically the Bird River Bridge with large rust spots - with this in mind, how will a significant increase in truck traffic (as well as regular vehicular traffic to account for the increase in employees at the mine) fair for these roads? Is Tanco willing to pay to assist with the maintenance of these highways with more than tax dollars?

- increased traffic leads to increased vehicular accidents, especially on long and windy stretches of highway with many blind spots - is Tanco considering increased funding to the emergency services in the area to address this concern?

- expansions come with noise, while home and cottage owners may be accustomed to the *current* level of Mining noise, this is not an indicator that the increased levels will be tolerated. Many folks live in rural areas to escape the noise, expansions to the mine at the level proposed will ruin this for many.

- expansions and increase in traffic also comes with increased pollution, not just increased pollution coming from the mine itself, but consider all the extra trucks on the roads and those emissions, plus all the dust and dirt spread in the air from said traffic.

- increases in noise means decrease in wildlife populations and sightings. As a society we can not afford to have wildlife populations decrease, they are quintessential to the equilibrium of this earth.

- The Bird River waterway is already in danger with increased human population in the area, there is increased phosphorus and this specifically harms the aquatic species living there - which again are quintessential to the equilibrium of earth - adding an expansion to the mine will only hard the waterways more than they already are. Also there has been talk about Tanco draining Bernic Lake to capture the minerals within

- I ask again how will this affect our ecosystem?

I truly hope the points made above are taken into consideration.

Thank you for the opportunity

Heather Routley



c.c.Wayne Ewasko - MLA Lac du Bonnet

James Bezan - MP Selkirk, Interlake and Eastman  
Mac Kinghorn - Councillor RM of Alexander  
Tracy Schmidt - Minister Environment & Climate Change  
Wab Kinew - Premier

## Winsor, Jennifer

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**Subject:** FW: Tanco Mine Expansion

**Importance:** High

Hi Jennifer,

I understand that the Tanco Mine expansion will likely be going through soon. First of, congratulations and I hope it's of benefit to the Province.

I have a cottage at Booster Lake and as I'm sure you are aware, the gravel roads to get there are not only dangerous but in fact can be quite treacherous. It shocks me that more damages, injuries and deaths have not occurred. My valid concern lies with the amount of additional traffic from trucks that will be on the gravel road. The more trucks, the more dangerous it will be. As we all know, it's those same trucks that cause damage to the road.

Is it the plan of the Province to pave said roads? At least up to the Tanco mine turnoff? This should be a condition in allowing the Tanco mine expansion to go through.

I look forward to your prompt reply.

All the best,



**Jason Wagner**

The contents of this email, including but not limited to any attachment(s), are confidential and the property of Fifty North Events Inc. If you are not the intended recipient of this, please notify us immediately. We appreciate your understanding.

Le contenu de ce courriel, y compris, mais sans s'y limiter, toute pièce jointe, est confidentiel et la propriété de Fifty North Events Inc. Si vous n'en êtes pas le destinataire, veuillez nous en informer immédiatement. Nous apprécions votre compréhension.

**Winsor, Jennifer**

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**Subject:** FW: Expansion of production at TANCO mine

Hello

I am a cottager at Bird Lake we have been travelling the gravel portion of 315 for 65 years and on average we make 20 round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site. Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for cottagers, campers, and recreational users. It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes. Reduced visibility when the road is dry and dusty is extremely hazardous.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,

Douglas and Catherine Geddes

**Winsor, Jennifer**

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**Subject:**

FW: Expansion of TANCO mine at Bernic Lake

Hello

I am a [REDACTED], we have been travelling the gravel portion of 315 for about 40 years and on average we make 15 round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site. Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for cottagers, campers, and recreational users. It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes. It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,

James Nazer

**Winsor, Jennifer**

---

**Subject:** FW: Tanco mine

**Hello Jennifer,**

We are writing in response to the Tanco mine expansion. We are located [REDACTED]  
Therefore, the said bridge is our only means for accessing our property. We intend on making this our permanent residence in the near future.

Over the last couple years we have noticed increased traffic because of assumed increased activity at the existing mine. We are concerned that further expansion could lead to bridge/road damage. We also have concerns that the plan to drain the lake into the Bird River could affect water quality for us and wildlife as well as water levels and a sediment increase.

Please keep us informed.

Thank you,

John and Kristine Watts  
[REDACTED]  
[REDACTED]

**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) - Tailings Reprocessing Facility Project - FILE: 1906.50

Dear Ms. Winsor,

I am a [REDACTED]. My family and I utilize our cottage year-round and access it via Provincial Road 315 (PR315) South from Provincial Road 313.

The TANCO mine at Bernic Lake also uses PR315 for all vehicle traffic in and out of the mine site. This road is unique because it changes from Class B1 highway to Winter Seasonal RTAC classification at the Bird River bridge. The winter seasonal RTAC route is entirely gravel. TANCO mine vehicles and trucks travel a 10 km gravel portion of PR315 before turning onto the Bernic Lake road.

This gravel road is often in poor condition with numerous potholes, ruts, and general washboard conditions year-round. Ostensibly, the bulk of this damage is due to heavy vehicles travelling on it. Given a 330% increase in concentrate truck traffic proposed by Tanco Mine, road conditions are highly likely to worsen, even if seasonal load restrictions are observed. This will negatively impact the safety of commercial and non-commercial traffic who use the road year-round.

A second consideration is the general condition of the Bird River Bridge on PR315. It is also frequently in poor condition with numerous potholes, ruts and even large concrete chunks lying hap hazard along the bridge deck. It is a narrow, limited capacity bridge which will suffer further damage from increased heavy truck traffic.

Please consider having Tanco upgrade the gravel portion of PR315 to pavement as well as perform a detailed structural analysis and pavement improvement to the Bird River Bridge.

This will enhance the safety of not just recreational users in the area but also commercial traffic utilizing PR315.

Regards,

John Kun  
Winnipeg, MB.

**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

Hello,

I am a [REDACTED], we have been travelling the gravel portion of 315 for 4 years and on average we make 20 round trips on Highway 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson and Black Lake) for cottagers, campers, and recreational users.

It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,  
Keli Hutton

**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

Hello,

I am a [REDACTED], we have been travelling the gravel portion of 315 for 3 years and on average we make 10 round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake, Beresford Lake and Long Lake) for cottagers, campers, and recreational users.

It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,

Kelly

**Winsor, Jennifer**

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**Subject:**

FW: Tantalum Mining increased traffic on highway 315

RE: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50 Hello, I am [REDACTED] and we have been travelling the gravel portion of 315 for 17 years and on average we make approx 50 plus round trips on 315 per year. I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site. Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson and Black Lake) for cottagers, campers, and recreational users. It is a gravel road that is often in very poor condition at the best of times. The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse. As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes. It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks. The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough. Furthermore the gravel has all but worn away so grading does little to address the poor state of the road conditions. Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis. Thanks,  
Kirsten Dupley

**Winsor, Jennifer**

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**Subject:** FW: Tanco mine expansion at Bernice lake

Hello,

I am a [REDACTED] we have been travelling the gravel portion of 315 for 40 years and on average we make 12 round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for cottagers, campers, and recreational users.

It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,  
Robert and Laura Skabar



# MANITOBA ECO-NETWORK

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302 – 583 Ellice Avenue, Winnipeg MB R3B 1Z7

Tel: 204-947-6511 [www.mbeconetwork.org](http://www.mbeconetwork.org)

January 6, 2023

Jennifer Winsor – [Jennifer.Winsor@gov.mb.ca](mailto:Jennifer.Winsor@gov.mb.ca)  
Senior Environmental Engineer  
Department of Environment and Climate Change

Cc: Public Registry -[publicregistry@gov.mb.ca](mailto:publicregistry@gov.mb.ca)

## **Re: Comments on TANCO EAP - Tailings Reprocessing Facility Project**

In this letter, the Manitoba Eco-Network provides comments on TANCO's proposed Tailings Reprocessing Facility Project. We have previously engaged on related developments, including an appeal of the approval of TANCO's Bernic Lake Mine Tailings Management Area Dam Raise and Control Structure Upgrade. We continue to have serious concerns about TANCO's operations in this area, and this proposal compounds our concerns with the operations. It appears to be a case of license creep, where proponents incrementally modify design and operational characteristics of a development in order to skirt more comprehensive public scrutiny.

Due to the timing of the consultation period, which fell during the December holiday season, we were not able to undertake a comprehensive review of this specific Environment Act Proposal (EAP). In order to facilitate meaningful public engagement, we **strongly recommend** consultation opportunities not be held during holiday breaks and other common times when offices are closed, and many are off work.

Given the potential negative impacts associated with this constantly changing operation, we recommend:

- The Department of Environment and Climate Change require additional information from TANCO, subject to a review by TAC and a second public comment period.
- The Minister require TANCO's operations (not only this application, but also the recently approved modifications) undergo an evidence-based review by the Clean Environment Commission with a public hearing and associated participant funding program.
- In preparation for such a review, the Department should ensure all associated licences, including Licence No. 973, include requirements for the construction and operation of the tailings ponds as well as requirements for the monitoring of potential environmental impacts.

### Missing Information: Tailings Ponds and Water Management

This specific application appears to involve the construction of a bigger mill for operations, not only for reprocessing the tailings, but also to increase the overall mine capacity. We note the tailings volume produced annually will increase by 6 times. This is obviously why the expansion of the existing tailings pond, which was granted last fall, was necessary. In our minds, the two applications are inextricably linked. Our concerns about TANCO's operations identified in the fall have not been adequately addressed, and indeed may be compounded in this application.

Specifically, TANCO still does not appear to have conducted a stability analysis, which should have informed the alteration design proposal for the tailings pond. The properties of the foundation material continue to appear to be unknown.

We are concerned that the corporation continues to operate and expand a tailings storage facility that is not properly contained (i.e., eliminating transport of various chemicals to the surrounding environment). This is particularly concerning when considering the by-product produced by reprocessing the tailings. This by-product material will likely be more concentrated, meaning that chemicals of concern that may leach into the surrounding environment will be present in higher concentrations in the final tailings. Thus, tailings should only be placed in a fully contained storage facility.

We have outstanding questions about the water balance required for operations (see section 3.2.5). We have concerns about the use of non-standard terminology in identifying water management practices (e.g., VOID, "make-up water"). Although the fresh water added to the processes initially appears to be quite small, it appears that overall, the operation requires 30 cubic metres per hour of non-process water. Significantly more information is needed to fully comment on water requirements for the new facility.

Underground ore will be stockpiled during the warmer months before being processed in the plant during the winter. Runoff will be collected in a ditch which will flow to the WTMA (west tailings area). It appears that it will just be stockpiled on a gravel pad (called Run of Mill pad) so a proper liner/containment system below the stockpiled ore must be put in place to ensure that rain infiltrating the pile is properly managed and sent to WTMA. Similarly, proper containment systems will be required beneath the fuel and propane storage areas (this was not described in the corresponding sections).

More information about TANCO's existing and future plans to monitor the surrounding groundwater and Bernic Lake would also be helpful. This should be detailed and include requirements for how much effluent the company is permitted by government to discharge in the lake, the protocols in place to ensure compliance with these targets, and publicly related details about key pollutants, including phosphorus.

Finally, we are concerned about the introduction of a new septic field for the increase in sanitary waste at the site. Can the Department please clarify if this is permissible under current regulatory requirements?

Overall, it is not apparent that TANCO has provided sufficient information to support the approval of their proposed Reprocessing Facility. We continue to have serious concerns with TANCO's operations in this area and recommend more data be collected about ongoing and proposed activities, and publicly reviewed, before any approvals are granted.

### Conclusion

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 that these principles will be reflected in the assessment and licensing decision for TANCO's proposed expansion and future proposed mining developments.

Recognizing the growing demand for critical minerals and expanded mining operations, including those proposed in TANCO's EAP, there is an urgent need for modernized and comprehensive laws and policies. With the Minister of Economic Development, Investment, Trade and Natural Resources tasked with the development of "a real critical minerals strategy that creates good jobs and economic growth in northern Manitoba with Indigenous inclusion", change appears to be on the horizon.

Until we have more comprehensive laws and policies, it is unclear how the mining projects currently being assessed and approved will be able to meet the objectives and requirements to be set out in this forthcoming strategy. There should be a pause on the approval of new developments or proposed expansions until we have updated laws and regulations that require a higher standard of environmental protection and sustainability.

Sincerely,

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

Dr. Patricia Fitzpatrick  
Policy Advocacy Committee

## Winsor, Jennifer

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**Subject:**

FW: Tanco

Hello Jennifer, I am [REDACTED], and have been for 42 years. I have volunteered to act as the president of the BLCOA, and also am one of the directors of the Manitoba Provincial Parks Cottage Owners Association MPPCOA. The MPPCOA has also asked me to head up a committee that is investigating mining activity in all Provincial Parks. As you can imagine, the increased mining activity has heightened the anxiety level of all cottagers, especially in Nopiming. After talking with many cottagers, the concerns that I am hearing have to do mostly with protecting the cottage investment, and the environment that surrounds the cottage communities. Also, one big concern that keeps coming up is the condition of the gravel roads in the Nopiming Park. With the Tanco expansion, and the possible new mine at Donner Lake, and also Werner Lake, we can expect a significant rise in truck traffic on HWY's 313,314,315. Can you tell us what precautions are going to be taken, if any, concerning the condition of these PT roads? We have already seen a degradation in road quality over the last 5 years, due to increased truck traffic heading to the Dumbarton and Werner Lake sites, and the Tanco expansion will only make it worse. The report has a table chart on page 26 table 3-3, shows an increased total of 280 weekly vehicles from 2024-2030, excluding the on site movement, and for us cottagers it is a huge concern. Tanco will be using road infrastructure that was never designed for these types of loads, and a sharp degradation in road quality is sure to happen. The road needs to be travelled by cottagers hauling campers, boats and other recreational equipment, and lately, the potholes and washboard caused by large trucks have already been very bad. We think that this concern needs to be addressed before any expansion takes place. Thank you for your consideration.

Martin Enns Booster Lake

BLCOA president

MPPCOA board member

**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

Hello,

I am a [REDACTED]. We have been travelling the gravel portion of 315 for 13 years and on average we make 45 round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the primary route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for residents, cottagers, campers, and recreational users. It is a gravel road, often in very poor condition at the best of times.

With the proposal, a large increase in the numbers of trucks using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse. As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes. It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks. The gravel portion of 315 is graded once a week, with any luck, but with climate change affecting the weather/seasons it isn't often enough. Please consider having TANCO contribute to highway improvements/upgrades, potentially even paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks

**Winsor, Jennifer**

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**Subject:** FW: Urgent Concerns Regarding Cesium Mining and Environmental Impact

Dear Jennifer Winsor,

I hope this email finds you well. I am writing to express my deep concern about the proposed cesium mining operations in the mine owned by TANCO in Eastern Manitoba, specifically its potential irreversible impact on the pristine Bird River.

As someone who cherishes the natural beauty of this region and personally enjoys spending every summer swimming and floating in the water with my raft, the prospect of pollution jeopardizing these activities is disheartening. The Bird River holds significant ecological value, and any harm caused by mining operations could have lasting consequences on the aquatic ecosystem.

I urge you to consider the long-term environmental implications before proceeding with the cesium mining project. Irreversible pollution in the Bird River not only threatens the biodiversity of the area but also disrupts the enjoyment and well-being of those who rely on this natural resource for recreational purposes.

I implore you to explore alternative, more sustainable solutions that prioritize the preservation of our environment. It is crucial to strike a balance between economic interests and the protection of our natural resources to ensure a harmonious coexistence between industry and the environment.

Thank you for your attention to this matter, and I sincerely hope that responsible and environmentally conscious decisions will guide the future of the mining operations in Eastern Manitoba.

Best regards,

Nolan



**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) - Tailings Reprocessing Facility Project - Increased traffic & safety risk

Good Day Ms. Winsor,

TANCO has owned and operated the Bernic Lake Mine since 1967 and been a fixture in the community since that time. Although I am pleased to learn of their expanding operations and continued occupancy in the area, steps to address the degrading infrastructure in the surrounding area must be taken prior to any expansion approval. In particular, provincial highway 315 (PH 315) has been utilized by the company for many years as the primary access to the mine site and to transport ore obtained during operations. Due to the increased traffic caused by the mine, the decline in road conditions from the paved portion of PH315 at Bird River to the Bernic Lake Mine access road has gotten to a point where there are serious safety concerns when travelling this portion. Large tire ridges, temporary patch jobs on water crossings and large pot holes, pose a risk to vehicle integrity and human health. With the increase in bulk trucks, required for the expanded operations, that will be transferring materials to and from the mine, the road will soon be beyond repair and will not be able to be used by either the mine or surrounding community.

Should the project move forward, I believe TANCO should be required to pave PH 315 from the Bernic Lake Mine access road to the paved portion at Bird River to minimize any safety risk within this area. The paved road will provide adequate integrity to support the increased traffic and bulk trucks. It would also demonstrate to TANCO's neighbours and surrounding communities that these serious concerns are not taken lightly by the company.

As my family and I prepare for another year of 25+ round trips to Davidson Lake in 2024 I would like to thank-you for taking my concerns into consideration.

Sincerely,  
Paul Lucyk

**Winsor, Jennifer**

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**Subject:**

FW: Tantalum Mining Corp. of Canada LTD. (TANCO) - Tailings Reprocessing Facility  
Project- File:1906.50

Hello, I am [REDACTED] we have been travelling the gravel portion of 315 for 18 years and on average we make [150] round trips on 315 per year. I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site. Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for cottagers, campers, and recreational users. It is a gravel road that is often in very poor condition at the best of times. The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse. As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes. It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks. The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough. Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis. Thanks, Roger Aubin cottage owner and resident.

**Winsor, Jennifer**

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**Subject:** FW: TANCO mine opposition

Hello Jennifer,

I am writing you to voice concern and opposition to the construction of the new TANCO mine facility due to the proposed draining of Bernic Lake into Bird River.

As the draining of the lake into Bird River will increase pollutants in the water negatively impacting the residents of the river.

My family has been at Bird River for four generations, spanning five decades. Much of our time has been spent enjoying the water, spending time kayaking, swimming or simply floating in front of our family cottage. The potentially irreversible impact that draining Bernic Lake into Bird River could cause will not only impact my family and future generations but all residents and wildlife of Bird River and the surrounding area.

Regards,

Spencer Libbrecht

**Winsor, Jennifer**

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**Subject:** FW: Tanco Mine Expansion

Good Afternoon,

I have been reading about the Tanco Mine expansion and hear that the proposal will likely go through. I am wondering if any thought has been given to having a paved road? At least up until the Tanco Mine turn off. I am asking, as I am sure others are, that this be taken into consideration.

As someone who often drives that road, I am not only concerned about the traffic that the expansion will cause, also about the safety and the state of the road.

Having increased trucks traveling down that road will only add to the at times unsafe conditions while traveling the gravel.

I would like to share an experience with you. When I was young, my family and I were returning down the gravel road. A car full of people in front of us had went off the road and into the ditch. A few were taken to hospital, however some passengers did not survive that accident. Each time I travel on the gravel road I think about this, and how its already unsafe conditions could have contributed to it. Now having a young family myself, I really do not wish to see this road become any more unsafe. I already can't tell you how many times my husband and I have seen tracks headed towards the ditch and have pulled over to make sure no one was stuck waiting for help.

Let us look at this early to avoid any further tragedy.

Thank you for your time.

**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

Hello,

We are [REDACTED], [REDACTED], we have been travelling the gravel portion of 315 for 20 of years and on average we make 20 to 30 round trips on 315 per year.

We are writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson, Black Lake and North Nopiming's Long Lake and Beresfod Lake for cottagers, campers, and recreational users.

It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Regards ,

Steve and Jody Reaburn  
Long Lake, Nopiming Provincial Park

**Winsor, Jennifer**

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**Subject:**

FW: Expansion of TANCO min at Bernic Lake

Hello

I am [REDACTED], we have been travelling the gravel portion of 315 for 57 years and on average we make 20 round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site. Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for cottagers, campers, and recreational users. It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

Reduced visibility when the road is dry and dusty is extremely hazardous.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,

Susan Geddes

**Winsor, Jennifer**

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**Subject:** FW: Immediate attention needed: Tanco Mine Roads at Nopiming Provincial Park

Dear Jennifer Windsor,

My name is Suzanne Phung, a concerned citizen and resident of Davidson Lake. I am writing to express my grave concerns regarding the proposed expansion of the Tanco Mine and its adverse effects on our local roads, which are already in a critical state.

The escalation in heavy vehicle traffic, as discussed by knowledgeable community members on the South Nopiming Facebook page, threatens to further deteriorate our road infrastructure. The bridges along Highway #315, already showing significant wear and tear, are of particular concern.

The gravel road leading to Tanco is riddled with potholes and suffers from poor maintenance, a situation worsened by the changing seasons and insufficient care. This not only affects my travels but also poses a hazard to all who traverse these roads.

I implore you to consider more robust infrastructure solutions, such as paving the critical sections of the road or reinforcing them to handle the expected increase in heavy traffic.

Our community, including my family at Davidson Lake, relies heavily on these roads for access and safety. The deteriorating road conditions are a significant barrier to enjoying and accessing our provincial park, Nopiming.

I hope our voices are heard and that decisive action is taken.

Thank you for your time and consideration.

Warm regards,

Suzanne Phung

Davidson Lake Resident

**Winsor, Jennifer**

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**Subject:** FW: Tanco mine project public registry 1906.50

Public Registry 1906.50  
Tailings Reprocessing Facility Project  
Tantalum Mining Corporation of Canada Ltd. (TANCO)

Hello,  
I would like to submit my concerns on the above project.

The concern is with the public safety and all users of highway 315. The section of the road that is a concern this road is a gravel road portion. Manitoba highways performs maintenance on it. The maintenance seems to be minimal with only the basic maintenance. Once heavy truck traffic damages this road it is never repaired to a reasonable safe condition for the remainder of the year. Many years there is no dust control and visibility is almost non existent putting all users at great risk, Especially hazardous behind or coming onto large heavy trucks.

With this project, the increase in heavy truck traffic is predicted to increase from 38 to 125 weekly increase along with other heavy trucks that use this road. This will put all users of this road in danger.

There must be a plan put in place to enhance the safety of this road, from repair of soft spots, enhanced road maintenance. Improved dust control, restrictions in place to limit road damage, restrict hours of heavy traffic operations as to not endanger cottage and recreation traveller's peak times.

Safety on this road is a major concern and must be addressed before this project is approved.

Mineral exploration and extraction should not put the public at danger

Tab Harrop

[REDACTED]

**Winsor, Jennifer**

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**Subject:** FW: Tantalum Mining Corp. of Canada Ltd. (TANCO) – Tailings Reprocessing Facility Project – FILE: 1906.50

Hello,

I have recently learned of this project and find that having such a short deadline during the holiday time is not very inclusive and does not follow best engagement practices.

I am a cottager at Flanders Lake, we have been travelling the gravel portion of 315 for years - first as a camper, now as a cottager. We visit our cabin regularly, visiting throughout the year (including winter) visiting multiple times per month.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site. Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for cottagers, campers, and recreational users. It is a gravel road that is often in very poor condition at the best of times, as your highways dept has even had to indicate the deteriorating conditions once you hit the mine (leaving from Nopiming).

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

I strongly urge you to consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,

Tiffany Skomro

Flander Lake

**Winsor, Jennifer**

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**Subject:** FW: Proposed tanco mine expansion at bernic lake

Hello,

I am [REDACTED] and we have been travelling the gravel portion of 315 for 30 years and on average we make 30 round trips on 315 per year.

I'm writing with great concern about the proposed expansion to the TANCO processing facility at Bernic Lake. The mine uses Manitoba highway 315 for all vehicle traffic in and out of the mine site.

Highway 315 is the main route to Nopiming Park (Bird Lake, Booster Lake, Flanders Lake, Tulabi Lake, Davidson Lake, Black Lake and Long Lake) for cottagers, campers, and recreational users.

It is a gravel road that is often in very poor condition at the best of times.

The large increase in the numbers of trucks that will be using 315 from the mine turn-off to the beginning of the paved road at Bird River will certainly make a bad situation even worse.

As it is, the road is dangerous with 2-way traffic and vehicles trying to avoid ruts and pot-holes.

It will become even more dangerous with the predicted nearly four-fold increase in concentrate trucks.

The gravel portion of 315 is graded once a week but with climate change affecting the weather/seasons it isn't often enough.

Please consider having TANCO contribute to highway improvements/upgrades notably paving the gravel portion of the route these trucks will be traveling on a daily basis.

Thanks,

Tyler lucyk

[REDACTED]

## Winsor, Jennifer

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**From:** Caillier, Ginette  
**Sent:** December 8, 2023 8:02 AM  
**To:** Winsor, Jennifer  
**Subject:** RE: For Review: Environment Act Proposal - Tantalum Mining Corp. of Canada Ltd. (TANCO) - File No. 1906.50

Good Morning Jennifer,

*On behalf of the Drainage and Water Rights Licensing Branch – Drainage Section, there are there appears to be water control works proposed namely a new perimeter drainage ditch and berm. If these are not licenced under the Environment Licence they may require authorization from our department.*

Please advise the proponent that under The Water Rights Act, a valid Water Rights Licence or Registration Certificate is required to control water or construct, establish or maintain any water control works. Water control works are defined as any dike, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert, borehole or contrivance for carrying or conducting water, that temporarily or permanently alters, or may, alter the flow or level of water, water in a water body, by any means, including drainage or changes, or may change the location or direction of flow of water by any means including drainage.

For more information, we encourage applicants to visit our [webpage](#) that has series of FAQs and how to videos and instructions to apply for a authorization online.

Thank you,

Ginette Caillier

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## Winsor, Jennifer

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**From:** Paille, Justin  
**Sent:** January 4, 2024 4:31 PM  
**To:** Winsor, Jennifer  
**Cc:** Cyrenne, Allan  
**Subject:** RE: For Review: Environment Act Proposal - Tantalum Mining Corp. of Canada Ltd. (TANCO) - File No. 1906.50

I do not have any comments at this time.

### Justin Paillé

Environment Officer | Agent de l'environnement

Environmental Compliance and Enforcement Branch | Direction de la conformité et de l'application de la loi en matière d'environnement

Environment and Climate Change | Environnement et Changement climatique

24 hr Environmental Emergency Response Line: 1-855-944-4888

Ligne 24 heures d'urgence environnementale : 1-855-944-4888

***Si vous préférez recevoir votre correspondance en français, veuillez nous en faire part par courrier, par courriel ou par téléphone.***

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## Winsor, Jennifer

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**From:** +WPG569 - Forestry and Peatlands Circulars  
**Sent:** January 5, 2024 9:02 AM  
**To:** Winsor, Jennifer  
**Subject:** RE: For Review: Environment Act Proposal - Tantalum Mining Corp. of Canada Ltd. (TANCO) - File No. 1906.50

Hi Jenifer,

Forestry has no concerns with the activity since the whole of the area is under some form of authority: EAL, Mineral, Surface, Quarry leases etc. for a long period of time and has already been disturbed. In the past, concerns related to the impacts of timber and how damming will effect water flow and flood the surrounding forest. Forestry advised that a timber damage appraisal would be required then, and that is the case today.

If the EAL is completed in favour of the newest alteration, Forestry and Peatlands will provide a timber assessment and issue a permit.

Jane

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## Winsor, Jennifer

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**From:** Benoit, Peter  
**Sent:** December 29, 2023 1:25 PM  
**To:** Winsor, Jennifer  
**Cc:** Sturgess, Yvonne; Robinson, Karen; Hilderman, Tim  
**Subject:** RE: For Review: Environment Act Proposal - Tantalum Mining Corp. of Canada Ltd. (TANCO) - File No. 1906.50

Hi Jennifer,

Thank you for the opportunity to review this project. I have no specific concerns.

Thanks,  
Peter

Dr. Peter Benoit  
Medical Officer of Health  
Manitoba Health  
MD MPH CCFP FRCPC

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## Winsor, Jennifer

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**From:** +WPG574 - HRB Archaeology  
**Sent:** December 29, 2023 10:49 AM  
**To:** Winsor, Jennifer  
**Subject:** RE: For Review: Environment Act Proposal - Tantalum Mining Corp. of Canada Ltd. (TANCO) - File No. 1906.50  
**Attachments:** AAS-23-21159\_MECC-EAB\_1906-50.pdf; Basic HRPP Guidelines Key Questions and Protocols to Consider\_V2.docx; Basic HRPP Guidelines Key Questions and Protocols to Consider\_V2.pdf

Good morning,

### **Conditional Approval – Implement a heritage resource protection plan (HRPP)**

Further to your e-mail regarding the above noted application, Manitoba's Historic Resources Branch (HRB) has examined the location in conjunction with Branch records for areas of potential concern. A Heritage Resource Impact Assessment was done under permit A121-23. The potential to impact heritage resources is believed to be low based on analysis of current data, therefore, the Historic Resources Branch has no concerns with the proposed project at this time.

HRB requires a HRPP be included in planning, development, and operations, in the event heritage resources (including human remains and palaeontological resources) are accidentally encountered.

If any details of the current application undergo modification or if future work necessitates a change to the plans, the applicant is to contact HRB for re-evaluation.

### **Legislation**

Under Section 46 and 51 of the Heritage Resources Act (the Act), if at any time, heritage resources are encountered in association with these lands during testing and development, there is an obligation to report any heritage resources and a prohibition on destruction, damage or alteration of said resources. HRB may require that an acceptable heritage resource management strategy be implemented by the proponent/developer to mitigate the effects of their activity on the heritage resources.

Under Section 12(2) of the Act, the minister may require such other plans, documents, material and information, with respect to the work, activity, development or project, prior to commencement.

Heritage Resource Protection Plan

The HRPP consists of operational procedures to limit damage or destruction of heritage resources. This document assists proponents, landowners, managers, employees, and/or contractors etc. on what to do and whom to call should heritage resources accidentally be encountered when testing and development is underway on site.

If you have any questions, please contact as below for proper assignment and queueing.

*Archaeological Assessment Services Unit*

*Historic Resources Branch*

*Manitoba Sport, Culture, Heritage and Tourism*

*Main Floor – 213 Notre Dame Avenue*

*Winnipeg, MB*

*R3B 1N3*

*E: HRB.archaeology@gov.mb.ca*

## Winsor, Jennifer

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**From:** Beruar, Omkarnath  
**Sent:** December 21, 2023 1:25 PM  
**To:** Winsor, Jennifer  
**Cc:** Mans, Sonja  
**Subject:** FW: For Review: Environment Act Proposal - Tantalum Mining Corp. of Canada Ltd. (TANCO) - File No. 1906.50

Hi Jennifer, Please see my comments in the table below.

Thanks

Omkar

#	Page	section	comments/questions
1	3	Exe summary	-What is the current average daily production rate? - Is there any plan to increase UG mine production capacity? -If so, by how much and when?
2	4		- what is the chemical composition of tailings slurry? - what is the chemical composition of the original tailings in the WTMA - As a part of this proposal, don't we need to review the test results to validate the assumptions that "The tailings slurry is expected to be very similar in chemical composition to the slurry produced by the existing mill" ?
3	4		Not sure how the tailings in the WTMA will increase 6 fold, given that the reclaiming tailings from the WTMA are being reprocessed unless new material (tailings or ore) are brought in from outside for processing at the new mill. In fact it should decrease?

## Winsor, Jennifer

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**From:** +WPG969 - Roadside Development  
**Sent:** December 29, 2023 11:22 AM  
**To:** Winsor, Jennifer  
**Cc:** +STE1000 - MI.Utilities.Capital  
**Subject:** RE: For Review: Environment Act Proposal - Tantalum Mining Corp. of Canada Ltd. (TANCO) - File No. 1906.50

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Jennifer,

We have now had a chance to look at this one and wish to note the following:

- The AADT information shown on Page 28 is incorrect and does not show anything for the station that would be closest to the Tanco Mine access road (north of the Bird River bridge) on PR 315. Can you please have them revise this.
- A weekly traffic table is included but daily traffic is not. When we review, we look at daily traffic increases and compare it with the AADT. Can you please have them provide this.

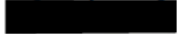
Once we have updated information, we can review this one again and issue comments at that time.

This information is also needed to determine if any changes to PR 315 are required and will be shared with our regional staff for their input.

Thanks,

*Shannon Burnett*

Manitoba Transportation and Infrastructure  
Engineering and Technical Services Division  
Highway Design Branch – Roadside Development Section



**Municipal and Northern Relations  
Community Planning Branch**

DATE: December 13, 2023

TO: Jennifer Winsor  
Senior Environmental Engineer  
Environmental Approvals Branch  
Manitoba Environment and Climate Change  
Box 35, 14 Fultz Blvd  
Winnipeg MB R3Y 0L6

FROM: Isaac Laapah  
Community Planner  
Community Planning Branch  
Municipal Relations  
L01 – 20 First Street S  
Beausejour MB R0E 0C0

PHONE NO: 204-583-2494

**SUBJECT: Environment Act Proposal Review – File 1906.50  
Tantalum Mining Corporation Tailings Reprocessing Facility  
Bernic Lake, 15-16-15E, Unorganized Territory**

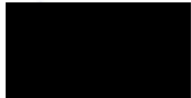
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On behalf of Municipal and Northern Relations, I have reviewed the Environment Act Proposal for the Tailings Reprocessing Facility Project (File 1906.50) at Bernic Lake, 15-16-15E.

The project is located in unorganized territory and there is no development plan or zoning by-law in effect at this location. Community Planning has no concerns with the Environment Act Proposal.

Thank you for the opportunity to review.

Sincerely,



Isaac Laapah  
Community Planner

## Winsor, Jennifer

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**From:** +WPG569 - Drinking Water - Approvals  
**Sent:** November 30, 2023 3:55 PM  
**To:** Winsor, Jennifer  
**Subject:** RE: For Review: Environment Act Proposal - Tantalum Mining Corp. of Canada Ltd. (TANCO) - File No. 1906.50

No concerns.  
Office of Drinking Water (ODW)

**Cory Vitt, P.Eng. M.Eng. CPPA CMMA**

(pronouns: they/them; please don't use "Mr. Vitt")

Acting Senior Approvals Engineer

Office of Drinking Water

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## Winsor, Jennifer

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**From:** Butterfield, Tamara  
**Sent:** December 6, 2023 7:48 AM  
**To:** Winsor, Jennifer  
**Cc:** Wiseman, Kylene  
**Subject:** RE: For Review: Environment Act Proposal - Tantalum Mining Corp. of Canada Ltd. (TANCO) - File No. 1906.50

Good Morning,

The Water Use Licensing Section, of the Drainage & Water Rights Licensing Branch, has no concerns with the proposed project.

Thanks

*Tamara Butterfield*

Senior Surface Water Licensing Technologist  
Manitoba Environment and Climate Change  
[tamara.butterfield@gov.mb.ca](mailto:tamara.butterfield@gov.mb.ca) / Cell: 204-918-6273

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February 1, 2024

Jennifer Winsor  
Senior Environmental Engineer, Environmental Approvals Branch  
Environment and Climate Change  
[Jennifer.Winsor@gov.mb.ca](mailto:Jennifer.Winsor@gov.mb.ca)

Dear Jennifer Winsor:

Thank you for the opportunity to review and provide comments on the Environment Act Proposal (EAP) Notice of Alteration (NOA) for the Tantalum Mining Corp. of Canada Ltd (TANCO) Tailings Reprocessing Facility Project – File: 1906.50. TANCO is submitting this NOA to modify Environment Act Licence (EAL) No. 973 for the Bernic Lake Mine (BLM) for the proposed project of constructing a new mill (tailings reprocessing facility) and ancillary facilities located on their existing surface lease No. 3 (SL-3) in Section 15-16-15 EPM in the R.M. of Lac du Bonnet. Staff in the Water Quality Management Section (WQMS) at Manitoba Environment and Climate Change reviewed the NOA and EAL 973.

#### **General Comments:**

The WQMS agrees with TANCO's proposal to modernize facility improvements, improve operational efficiencies, and recycle water sources, and reprocess mine waste from the tailings. However, the NOA is missing some critical information including results from water treatment studies, adequate data to support the assessment of environmental impacts, recommended mitigation measures, and details for which the NOA indicates will be provided later. The WQMS requests that Environmental Effects Monitoring reports be shared for review by provincial staff. More detailed comments regarding the NOA are provided below.

#### **Detailed Comments:**

1. Potential environmental effects of TANCO's proposed NOA on surface water is expected to be 'not significant' during site preparation and construction phases but elevated to 'potentially significant' during the operation phase due to changes in effluent quality discharged to Bernic Lake.
  - a. During tailings excavation and dredging, the proponent will incorporate relevant environmental protection measures such as silt curtains, floating baffles, or additional treatment to encourage the settling of solids and avoid elevated turbidity or other contaminants from being discharged out of the tailings management area and polishing pond. Although the report is expecting no significant impacts, no mention of performance metrics was given. The WQMS encourages increased monitoring to confirm the effectiveness of the incorporated protective measures.

- b. Drainage of surface water runoff from the site during preparation, construction and operation phases will be managed to the extent practicable, redirecting water to the West Tailings Management Area (WTMA), with net increases in effluent discharged out of the Main Dam not expected to be significant as suggested through by test work and modelling of potential effluent quantity. The report mentions that elevation raises, and storage capacity increases of the WTMA were made to accommodate the increased tailings and surface water runoff to the WTMA. The WQMS has concerns that no mention of 100-year flood scenarios (max precipitation flooding events) were incorporated, or at least mentioned for consideration. It is unclear what information is included in the test work and modelling. The WQMS requests test work and modelling results information be shared for review.
  - c. The proposal assumes that the mineralogy and chemical make-up of the tailings with the addition of the new mill will be like historic deposition in the tailings management area. This assumption should be monitored for confirmation and if the assumption should change, the proponent may have to re-evaluate treatment options or optimize their current treatment train.
  - d. Potentially significant effects to the quality of effluent discharged to Bernic Lake during the operation phase as highlighted by this report raises concern from the WQMS. Potentially significant effects as defined by this report are effects that are reasonably expected to occur, effects difficult to reverse, and could include adverse effects to common species or ecological features, with impacts anticipated beyond the project site. The report states that effluent discharged to Bernic Lake will be managed and monitored to meet regulatory requirements. It is important to note that meeting Metal and Diamond Mine Effluent Regulations may not be protective of downstream water quality impacts, and additional studies may be required if effects to water quality or aquatic life are observed. The WQMS recommends TANCO consider increasing effluent water quality monitoring due to the environmental assessment's potentially significant categorization of changes to effluent quality, the limited understanding of changes to discharge quantity, the expectation of increased phosphorus concentrations, and the present increased algal standing crops in Bernic lake directly attributed to phosphorus traced to mine effluent from the site. What mitigation or remediation measures is TANCO prepared to employ if water quality results confirm on-going impacts to Bernic Lake?
  - e. The WQMS has concerns over potential downstream impacts and requests that any environmental monitoring of impacts downstream of Bernic Lake be shared if available. Bernic Lake has a single outlet, Bernic Creek, which feeds into the Bird River, through Lac du Bonnet and the Winnipeg River to Lake Winnipeg.
2. Existing water quality in Bernic Lake suggests conditions are being impacted by mine operations at their current production rate.

A report prepared by Tetra Tech on behalf of TANCO provided an assessment of the environmental impact of the operation through to final closeout. The report provided an assessment of water quality data for Bernic Lake as monitored in 1968, 1975, and from 2002 to 2010. The results of the report indicated that changes in water quality in Bernic Lake are attributable to effluent discharge. Samples are generally analyzed for a full suite of physical and biological parameters, including metals, ions, and nutrients.

- a. The WQMS asks that TANCO share all Environmental Effects Monitoring (EEM) studies completed to date.
- b. Recent water quality data comparisons indicate several parameters such as hardness, alkalinity, and total dissolved solids have increased in Bernic Lake over time. Insufficient analysis was provided in the NOA regarding overall water quality changes overtime in the exposure area. The WQMS requests that detailed information of water quality parameter changes over time in Bernic Lake be provided. The WQMS requests that TANCO further investigate the report's observed increases in hardness, alkalinity and total dissolved solids in Bernic Lake and indicate what mitigation measures will be used to minimize future impacts. Do other water quality parameters show statistically significant changes (e.g., increases) in Bernic Lake over time?
- c. The report states that increased algal growth in Bernic Lake can be directly attributed to increased total phosphorus concentrations in the lake traced to effluent discharge. Single occurrences of metal concentrations were observed exceeding water quality objectives and guidelines in Bernic Lake including total iron (July 2020), and dissolved zinc (June 2022). Average seasonal total phosphorus concentrations observed were 1.5 to 3.9 times greater in Bernic Lake compared to the reference lake site. It is recommended that effluent quality standards for phosphorus be established for the TANCO mine given Bernic Lake has been found to be phosphorus limiting as proven by recent water quality monitoring data.
- d. The NOA suggests that the TANCO is conducting test works and modelling to confirm treatment measures required to maintain or (where possible) improve effluent discharge quality. TANCO proposes to develop operational changes to lower total phosphorus output, focusing study on potential design/treatment options for the new mill to reduce phosphorus. Ongoing test work will confirm these results. The WQMS requests that TANCO provide updated information and results for the ongoing test work and decision on treatment.
- e. The report suggests, from the basis of unrepresented test work, that the phosphorus impact to Bernic Lake associated with the proposed project is expected to be an order of magnitude lower than current loading. The WQMS supportive of TANCO's work to ensure that phosphorus loading to Bernic Lake decreases and asks that results be shared with Manitoba once available.

### 3. Recycled water use and potential concern for up-cycling dissolved solids

The report raised potential concern for up-cycling dissolved solids through their water cycling processes and alluded to test work being done to confirm recycled water quality and identify applicable treatment options. The WQMS requests that TANCO provide updated information and results for the ongoing test work and potential treatment options be shared, once available.

**Summary:**

The WQMS agrees that some of the proposed mitigation measures for dealing with the potential environment effects related to surface water runoff and contamination are acceptable, but at large the NOA is missing water quality data, water treatment and effluent discharge study results, concentration and load projections, and supporting evidence-based information. The WQMS requests an updated summary of historical, current water quality data in Bernic Lake and explanation of impacts of the mine. Ongoing studies, test works, and future projected effluent and surface water quality should be provided to better understand potential contaminants of concern in aquatic ecosystems. The WQMS is concerned that the proposed project may lead to 'potentially significant' changes in surface water quality to Bernic Lake. The WQMS is concerned about the continued and now elevated nutrient loading through discharge effluent into Bernic Lake and subsequently entering the Winnipeg River tributary accompanied by the potential contaminants of concern (e.g., trace elements, metals) entering and remaining in the aquatic ecosystem.

Should you have any questions or concerns or require further clarification regarding any of the comments or recommendations contained herein, please do not hesitate to contact me.

Sincerely,

Andrew Burton, M.Sc., P.Ag.  
Senior Water Quality Specialist  
Water Quality Management Section

c.c. Dylan Lyng and Brian Wiebe - Water Quality Management Section