

Cenovus Energy West White Rose Project (WWRP) Environmental Assessment Drill Cuttings  
Amendment – Review Comments

---

**SPECIFIC COMMENTS**

**Fisheries and Oceans Canada (DFO)**

Section 2.4 Summary of Updated Modelling, page 3 of 10 – A more detailed description of modelling results would be helpful, such as thicknesses (maximum, average) at various distance ranges from the origin, as was provided for the original drill cuttings deposition model.

Section 3.1 Findings of the Original Environmental Assessment, page 5 of 10, paragraph 2 - The Proponent should provide a brief explanation as to why Sensitive and Special Areas and Fisheries VCs do not need to be assessed. Revision recommended.

Section 3.2 Summary of Existing Conditions, page 5 of 10 – To assist DFO in completing a risk assessment to evaluate effects on fish and fish habitat, we would appreciate if the Proponent could provide a description of the habitat within the updated modelled dispersion area (0.1 mm boundary), as well as in the vicinity. The Proponent has provided information on aquatic species (including species at risk). If there is additional information on species in the updated modelled dispersion area (0.1 mm boundary), that would also be appreciated.

Section 3.3 Assessment of Proposed Project Modifications, pages 5 of 10 to 6 of 10 – Recommend that additional justification be provided for the assessment of potential residual adverse environmental effects, especially regarding magnitude and duration. It would be useful if the Proponent described results from other EEM programs in similar environments. Additionally, if there are EEM programs with cuttings volumes that would be comparable to West White Rose, these results should also be discussed.

Section 4.0 Mitigations / Commitments, page 7 of 10, bullet 2 – There is no active *Fisheries Act* Authorization for this project. This bullet should be removed.

**GENERAL COMMENTS**

**Fish, Food and Allied Workers Union (FFAW-Unifor)**

Overall, FFAW-Unifor does not agree that effects on fish and fish habitat in this instance are not significant. We have concerns from this amendment surrounding the discharging SBM drill cuttings into our shared marine environment. This amendment minimizes the risks imposed on fish and fish habitats and subsequently the fishing industry as a whole. The addition of any foreign material, including SBM drill cuttings, no matter the magnitude, jeopardizes the health of the ocean and the resources our members rely on.

## Cenovus Energy West White Rose Project (WWRP) Environmental Assessment Drill Cuttings Amendment – Review Comments

---

The implication throughout this amendment that adverse environmental effects on fish species due to the discharge of SBM drill cuttings are not considered significant if they do not exist beyond one generation is extremely concerning to our members. Any impact on fish biomass or resource availability is significant and potentially detrimental to the economic opportunity of fish harvesters and the profitability of their catch. Furthermore, fish harvesters do not support predictions throughout this amendment that all adverse environmental impacts will be mitigated. This is a very strong statement to make considering it is prediction-based.

Language such as “predominantly non-toxic, highly localized effects, low toxicity and low bioaccumulation effects” are misleading and minimize the admitted impacts imposed on the marine environment with the release of SBM drill cuttings. The ocean is a highly dynamic environment and commercial species are not equally distributed throughout. Impacts within the established safety zone can and likely will affect marine flora and fauna throughout the water column to spread elsewhere.

Oxygen depletion due to biodegradation of chemicals from SBM cuttings treated with the Shaker + Dryer + Centrifuge technology discussed in this amendment have admitted, direct and indirect effects on fish habitat, prey availability, and fish injury and mortality. Environmental changes associated with the deposition of these drill muds can last up to five years or more. Benthic populations in particular face the threat of potentially irreversible changes. Sediment contamination and its effects on benthos has not yet translated into effects on resource availability but this remains to be seen. These threats impact fishing now and may have far-reaching consequences not yet considered.

FFAW-Unifor supports ongoing effects monitoring through Cenovus’ environmental effects monitoring program. Further clarity on when in Q2 2023 this newly designed program will be completed is welcomed. We are pleased to see revisions will be made to the existing contingency plans and the various outlined mitigation measures, however, it is not clear when these plans will be finalized beyond “prior to the onset of activities.”