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FFAW | UNIFOR
Fish, Food & Allied Workers

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Canada-Newfoundland and Labrador Offshore Petroleum Board
240 Waterford Bridge Road
The Tower Corporate Campus – West Campus Hall
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**Re: West White Rose Project (WWRP) Environmental Assessment Drill Cuttings
Amendment**

Dear Mr. Hicks,

Please accept these comments on behalf of the Fish, Food and Allied Workers Union (FFAW-Unifor) on the amendment to the Environmental Assessment of Cenvous' West White Rose Project with respect to a request for a proposed modification to the disposal of cuttings drilled with synthetic-based mud (SBM).

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.

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.

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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."

We appreciate the opportunity to be engaged in this review process and look forward to continued engagement on this project with Cenovus and the C-NLOPB.

Best,

Katie Power, Energy Industry Liaison