

To: The Honourable Steven Guilbeault  
Minister of Environment and Climate Change

CC: The Honourable Mark Holland  
Minister of Health of Canada

May 27th, 2024

**Re: Support for Assessment of Naphthenic Acids in Oil Sands Process Water under the  
*Canadian Environmental Protection Act, 1999***

Honourable Minister Guilbeault,

As a group of Canada's leading toxicologists, environment and human health experts, and others within the scientific community, we are writing to express our support for the [request submitted by the Athabasca Chipewyan First Nation, Keepers of the Water, and Environmental Defence](#), represented by lawyers at Ecojustice, for an assessment of naphthenic acids (NAs) found in oil sands process water (OSPW) under section 76(1) of the *Canadian Environmental Protection Act, 1999* (CEPA).

Our review of the current scientific literature highlights significant concerns regarding the environmental and human health impacts of OSPW NAs, as well as the need for additional toxicity studies. These toxic compounds are entering or may enter ecosystems in Canada in significant quantities through seepage, spills, and leaks from tailings ponds, and exhibit potential for acute and long-term ecological harm and human health risks.<sup>1</sup>

Given the exclusion of OSPW NAs from the [recent assessment of commercial naphthenic acids](#), Environment and Climate Change Canada and Health Canada have not assessed the hazard and exposure risks of OSPW NAs. A comprehensive risk assessment of OSPW NAs must be conducted to ensure the protection of vulnerable populations and the maintenance of biological diversity. The existing data suggests that OSPW NAs may pose a considerable threat to the environment and human health, including acute and chronic toxicity to aquatic life and potential disruption of endocrine functions and other impacts on reproductive health in humans.

We urge your office to initiate this essential assessment without delay, applying the precautionary principle and upholding the right to a healthy environment as mandated by CEPA. A risk

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<sup>1</sup> See, for example: Chao Li et al, "[The toxicity of oil sands process-affected water \(OSPW\): A critical review](#)" (2017) 601-602 *Science of the Total Environment* 1785-1802; Clemente & Fedorak, "[A review of the occurrence, analyses, toxicity, and biodegradation of naphthenic acids](#)" (2005) 60 *Chemosphere* 585-600.

assessment is not only a regulatory obligation but also a moral imperative to safeguard the health of current and future generations.

Thank you for considering this significant environmental health issue. We are available to provide further comments as needed.

Best,

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