

We Eat Fish! FAQ Sheet: Breaking down Alaska's Water Quality Standards, Human Health Criteria, and the Fish Consumption Rate

Q: Is it safe to eat Alaskan fish?

A: Yes! Despite the weak standards protecting Alaska's water, the state has some of the cleanest water and healthiest fish in the world. The Alaska Seafood Marketing Institute (ASMI) has done detailed chemical analysis on the tissue of over 600 samples, and concluded that Alaska fish remain safe and beneficial to human health to eat.

Q: What does the Clean Water Act do?

A: The 1972 Clean Water Act is the primary federal law governing water pollution. Its objective is to maintain the integrity and health of the nation's waters to the extent that they remain swimmable, fishable, and drinkable for all generations to come. Under the act, states must adopt water quality standards (WQS) that meet this objective. Two of the major factors determining a state's WQS are the Fish Consumption Rate and the Acceptable Cancer Risk it chooses to adopt.

Q: What is a Fish Consumption Rate (FCR)?

A: Fish Consumption Rate (often also referred to as the Fish Consumption Value) is the term the Clean Water Act uses to describe the average amount of fish a person eats per day. If a population eats more fish, the theory goes, lower levels of pollutants should be allowed into the waters from which communities harvest, eat, and drink. This is to prevent bioaccumulative toxins from building up in our waters, our seafood, and finally in our bodies.

It should also be noted that "fish" here refers to any species harvested from the aquatic environment. Consumption of seaweed, finfish, shellfish, and marine mammals is included under the Clean Water Act protections.

Q: What are bioaccumulative toxins?

A: Bioaccumulative toxins are a class of persistent compounds with a high resistance to degradation and are not eliminated through metabolism. Simply put, they build up in tissues without breaking down, and tend to be more concentrated higher in the food chain (something known as bioconcentration). The most well-known example is DDT. Seafood is the primary source by which humans ingest bioaccumulative toxins, as contaminants wash into the waterways and permeate the environment in which aquatic organisms live and feed. For this reason, as the Alaska Seafood Marketing Institute concluded, “The best way to ensure the lowest levels of contaminants is to eat fish known to have low levels, such as Alaska-caught fish.”

Q: What is the state of Alaska’s Fish Consumption Rate?

A: The State has set Alaska’s Fish Consumption Rate at 6.5 grams/person/day, tied for the lowest of any state in the nation. Obviously, for most Alaskans, this number is out of touch with reality. The EPA, in 2000, recommended that a rate of 142.4 grams be applied to populations that practice subsistence harvest. Oregon has recently changed its Fish Consumption Rate to 175 grams/person/day, and Washington is in the process of increasing its FCR to the same number. Despite this recommendation and Alaska specific data showing 6.5 grams to be as much as 40x too low an estimate, the State of Alaska’s FCR remains at 6.5 grams.

Q: Why is Alaska’s FCR so low when Alaskans eat so much fish?

A: Alaska’s FCR puts the future of our waters at risk by keeping water quality standards lower than they should be. The lower the FCR remains, the more polluters can avoid the cost of necessary water treatment and continue to discharge toxins associated with human health issues into waterways. This number remains low because industries have exerted pressure for the state not to act. The state has defended its inaction by claiming that more data is needed to update the FCR and water quality standards. This is why it’s important to celebrate the clean water and seafood that make Alaska what it is. By standing up to the state and telling them that “We Eat Fish!,” we’re helping protect our clean water resources for generations to come.

Q: How do we know that Alaska’s Fish Consumption Rate is set too low?

A: Alaska leads the nation in subsistence food use, harvesting over 50 million pounds of wild foods annually.

The most recent and well-designed effort to measure Fish Consumption Rates for Alaska communities comes from the Seldovia Village Tribe, who found an FCR of 247.1 grams to be statistically representative in South Central Alaska. Data confirming the need for a much higher rate has been around for decades from sources such as the Alaska Department of Fish and Game, Alaska's Division of Public Health, and SEARHC. It is the EPA's recommendation that this type of local or regional data dictates a state's FCR.

Q: What is an Acceptable Cancer Risk and what is Alaska's set at?

A: We should first note that we don't believe any incidences of cancer are "acceptable," but for the sake of discussing this regulation, the Acceptable Cancer Risk is the policy set by the state aimed at keeping incidences of cancer due to bioaccumulative toxins within a certain threshold. Each state, as with the Fish Consumption Rate, sets its own Acceptable Cancer Risk. Most states have adopted an acceptable risk of 1 in a million incidences of cancer. Yet Alaska's is still set at a less protective rate of 1 in a 100,000, meaning Alaska tolerates 10x more incidences of cancer than other states. Between this rate being set too high and the FCR being set too low, Alaska's pristine waters and water-based resources remain unprotected from future degradation.

Q: Why does the state determine these rates if the Clean Water Act is federal law?

A: The Clean Water Act is federal law, but is implemented by state agencies in each state. This is why the federal EPA can have recommendations for policies, but ultimately Alaska's Department of Environmental Conservation (DEC) is supposed to act. However if the state fails to act, the EPA may step in and use the authority granted it under section 303(c)(3) of the Clean Water Act to issue more reasonable standards. This is what happened recently down in Washington State. To ensure Alaska's waters and fisheries remain some of the best in the world, Inside Passage Waterkeeper is petitioning the EPA for action.

Q: What are the policies of other states in the region?

A: Oregon, Washington, and even land locked Idaho are using or in the process of implementing a FCR of 175grams/person/day and an Acceptable Cancer Risk of 1 incidence of cancer in a million people. Alaska's water quality standards pale in comparison to these nearby states. But despite such lax regulations, Alaska's

waters remain some of the cleanest in the world. Other states in the Pacific Northwest must issue warnings about consuming fish because the tissue has become so filled with toxins. Alaska has the unique opportunity to keep its already clean water clean and protect these resources in perpetuity.

Q: Who will be affected by this change?

A: Alaskans of all stripes will benefit from the assurance that higher Water Quality Standards are protecting our vital water and seafood resources. Some wastewater discharge permittees may need to upgrade their systems to ensure that wastewater from mines and municipal wastewater treatment facilities meet higher standards, or seek alternatives to reduce or avoid discharging waste into our clean waters. Alaska already limits several pollutants beyond what any new criteria would require. Many of the other target toxins are pesticides, herbicides, flame retardants and other organics that are not currently discharged by fish processors and others in the fishing industry.

Q: How can we raise our Fish Consumption Rate and protect our waters?

A: Alaska's Department of Environmental Conservation has stated on various occasions that reviewing the FCR is a priority. Yet the agency stated that for the 2015-2017 Triennial Review of Alaska's Water Quality Standards it won't be making any changes to the policy. Strong citizen pressure can help counter industry pressure to keep our FCR low, which is why Inside Passage Waterkeeper is working to educate people about policy so they can speak out and demand change. The time is now to let our leaders know that We Eat Fish!

Q: What can I do?

A: Sign our petition to get involved, and we can let you know when there are opportunities to write letters, reach out to friends, or come to events. Your voice can help ensure that clean water, safe seafood, and sustainable, healthy communities define the state of Alaska for generations to come!

More information at www.insidepassagewaterkeeper.org/weeatfish

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