



Chippewa Ottawa Resource Authority

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October 31, 2011

Lana Pollack, U.S. Commissioner
International Joint Commission
Great Lakes Regional Office
P.O. Box 32869
Detroit, MI 48232

Re: Comments on Draft Fish Consumption Priority Work Group Report.

Dear Ms. Pollack:

On behalf of the Chippewa Ottawa Resource Authority (CORA) we are writing to comment on the Draft Priority Work Group Report on Fish Consumption (Report). In particular, CORA is concerned that the report misrepresents and exaggerates the presumed risks associated with consuming Great Lakes fish, and does not present a fair and proper balance with the nutritional, cultural and holistic health benefits of fish consumption, particularly in relation to Native American communities in the Great Lakes.

CORA represents five tribes in Michigan with regard to the tribes' commercial and subsistence fisheries in the 1836 treaty-ceded waters of Lakes Huron, Michigan and Superior. The tribes which are party to the 1836 Treaty are the Bay Mills Indian Community, Grand Traverse Band of Ottawa and Chippewa Indians, Little River Band of Ottawa Indians, Little Traverse Bay Bands of Odawa Indians and Sault Ste. Marie Tribe of Chippewa Indians.

Due to the declining levels of many anthropogenic chemicals in Great Lakes fish and the mounting evidence supporting the importance of fish-sourced polyunsaturated fatty acids (PUFAs) in human diets, the IJC indicated interest in comparing the benefits and risks of eating Great Lakes fish in its 2004 priorities cycle. We understood that the Report was supposed to reflect that comparison, and we support such an analysis; however, the report instead focuses on the potential risks associated with consumption of Great Lakes fish, and virtually ignores the benefits of fish consumption. CORA argues that a more accurate and responsible approach would include a balanced discussion between risks and health benefits so that potential fish consumers could make an informed choice.

Furthermore, and perhaps most importantly, the Report does not describe, or even acknowledge, that other foodstuffs particularly animal based food sources like butter, milk, beef, chicken and pork also contain anthropogenic contaminants like dioxin, PCBs, steroids and antibiotics. It is understood that the levels of some of these contaminants may be lower than certain Great Lakes fish, however, the vast majority of North Americans typically consume much more of these foods than they do fish. The cumulative levels of contaminants in non-fish food items must certainly approach the levels of Great Lakes fish when quantities consumed are considered. We believe that the lack of scientific inquiries into the cumulative levels of contaminants in other animal based foods is probably inversely proportional to the economic and political clout of the agricultural industry in North America.

One important result of this apparent bias against fish consumption is that consumers are advised to minimize consumption of Great Lakes fish, in favor of alternate foods; however, no similar advice is provided regarding the consumption of other protein sources to help the consumer choose. It is conceivable, perhaps probable, that consumers in fact heed the fish consumption advice, thereby choosing to consume non-fish food items that are either as contaminated, or present other negative health risks, that equal or exceed risks posed by consumption of Great Lakes fish.

We also note that the Report continues to imply that contaminants in Great Lakes fish occur at harmful levels in all species, in all areas – continuing the mis-information that promoted the cliché “...don’t eat Great Lakes fish”. However, research has shown that contaminant levels vary by species and location, and that contaminant levels can be dramatically reduced by proper preparation of the fish prior to consumption (e.g. skin-off fillets).

In looking at the scientific studies used as references for the report, we note that very few were able to document a direct connection between adverse human health effects and consumption of Great Lakes fish despite the number of studies conducted in the past 30 years. Instead, much of the Report’s supporting documentation that attempts to link adverse health effects to fish consumption are based on contamination resulting from industrial accidents, occupational exposure, and experimental dosing of laboratory animals; most or all of which represent exposure levels far greater than could be achieved through any conceivable “normal” consumption of Great Lakes fish.

We note that the Report describes some of the more common chemicals (e.g. PCBs, DDT) found in Great Lakes fish, but makes no reference to the past and current levels (trends) of these chemicals in fish, nor any relationship to the amount of such chemicals that could be ingested or retained by normal consumption of fish. Instead, the description of chemicals in the Report reads like a simple Wikipedia definition that has the clear intent to alarm the reader.

CORA would especially like to note that in economically disadvantaged populations, like many Native American communities, good quality and nutritional protein sources are

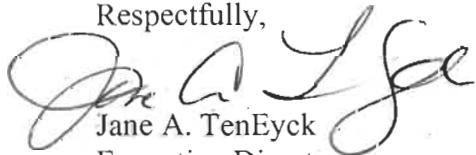
difficult to afford and are therefore often absent from people's diets. Locally harvested fish and game are a logical alternative to expensive store-bought sources of protein like beef, chicken and pork however, Native Americans and others are still being advised to minimize consumption of Great Lakes fish in favor of other food items. As a result, Native American communities, as well as people all over the United States, turn to cheaper, high-fat, high-calorie food items that are much more prevalent and available.

The physical activity and cultural well-being of fishing itself should be considered under the health benefits of eating Great Lakes fish. Modern lifestyles also foster a trend toward inactivity that should be considered. Subsistence fishing was a traditional Native American activity that is also being thwarted by contradictory advice regarding the risks of fish consumption. CORA and other tribal groups in the Great Lakes have provided advice directed to Native Americans in the Great Lakes on how they can eat certain fish, such as whitefish, that contain fewer contaminants. The IJC Work Group Report does not seem to consider that this approach can allow the continued consumption of Great Lakes fish while avoiding the risks of contaminant exposure since it is not mentioned in the Report.

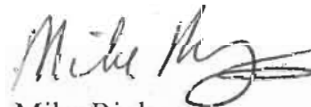
CORA expects that our concerns regarding the following issues be addressed in the Report; 1) the gross imbalance between health benefits of fish consumption vs. risks, 2) misrepresentation and assumptions of risks associated with fish consumption vs. risks associated with consumption of alternate food items, 3) proper representation of past and current (trends) contaminant levels in Great Lakes fish, and the potential bioaccumulation in humans under normal consumption habits, and 4) elimination or proper characterization of the individual contaminant descriptions in order to avoid the obvious scare tactics in describing the effects of those chemicals on human health – under unrealistically high levels.

If you have any questions or would like to discuss this matter in more detail, please do not hesitate to contact us by telephone at (906) 632-0072 or via email jteneyck@chippewaottawa.org and mripley@sault.com.

Respectfully,



Jane A. TenEyck
Executive Director
Chippewa Ottawa Resource Authority



Mike Ripley
Environmental Coordinator
Inter-Tribal Fisheries and
Assessment Program

Cc: CORA Board
IJC Commissioners
IJC Work Group Members