Department of Ecology
Fish Consumption Technical Review Meeting
November 27, 2012 | Seattle, WA

Meeting Summary

On November 27, 2012, Washington State Department of Ecology (Ecology) hosted the second technical review panel meeting to discuss the revised version of the Fish Consumption Technical Report V.2.

List of Attendees

Name	Affiliation	Email
Dave Bradley	WA Department of Ecology	dbra461@ecy.wa.gov
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Welcome, Introductions and Logistics – Angie Thomson, EnviroIssues

Angie Thomson, facilitator, started the meeting with introductions and a recap from the previous meeting. Participants introduced themselves and provided a brief background on their involvement in fish consumption.

Continued Discussion on Distinction between Science and Policy

Overview

The purpose of this meeting is to continue discussion of how Ecology addressed the major technical issues associated with public comments received on the fish consumption rate technical support document.

Questions for discussion

- Does the revised Technical Support Document (TSD) provide a clear distinction between matters of science and policy?
- If not, what revisions would help clarify this distinction?

Discussion

Participants wondered how the TSD will be used to make site specific decisions. Some people expressed concern that the TSD may be used differently depending on which program was using the document. Ecology clarified that the TSD is intended to be used as a technical resource for multiple policy decisions in various programs. Site specific and risk assessment decisions will be made on a case-by-case basis by site managers.

The discussion addressed the importance of providing information through a variety of analyses to assist site specific and risk assessment decisions. People suggested adding a section to the report explaining how science may affect policy decisions and how policy decisions may affect science, and include examples. Participants felt the revised TSD provides valuable information to support policy decisions but more work may be needed to make a clearer distinction between science and policy.

Discussion on Additional Evaluations

Overview

At the first Technical Review Meeting, a number of additional data evaluations were recommended. Ecology reviewed these evaluations for national, tribal and API fish dietary information.

- National fish dietary information
    - Evaluate NHANES dietary information to include non-consumers of fish as well as consumers of fish.
    - Provide confidence intervals for this re-evaluation particularly for mean and percentiles.
- Tribal and API fish dietary information
    - Confidence intervals applied to tribal and API fish dietary information.
    - Evaluate the potential influence of assumptions used to calculate rates (percentiles) from published surveys compared to use of individual response data (Tulalip tribal data).

The group also suggested producing plots with percentiles and confidence bounds for tabulated fish dietary information used in the September 2012 Report "Statistical Analysis of National and Washington State Fish Consumption Data."

Question for discussion

- What additional evaluations would you recommend to address issues and concerns?

Discussion

The group discussed the importance of confidence intervals on the national data. Many people felt having confidence intervals is helpful to inform regulatory decisions for sediment, water quality, and site specific issues, and to determine acceptable risks.

People provided several suggestions on prioritizing additional analyses that could be performed:

- Prioritize analysis of Tulalip data before Squaxin data (Tulalip consumption is more focused in Puget Sound).
- For comparison, do additional analyses of the Suquamish data for Puget Sound consumption.
- Next, compare rates for anadromous and non-anadromous consumption using individual response data.
- Consider the possibility of mining national dietary data for coastal fish dietary information.

Several people noted that the API data has limited applicability for this analysis.

Technical Issue: Use of Information

Overview

Dave Bradley spoke about the interaction between science and policy, and how uncertainty and variability influence use of information. He reiterated earlier statements that the TSD is designed to compile available scientific information on fish consumption rates. Ecology expects that this information will be considered when making a variety of regulatory and non-regulatory decisions. He summarized several ways information on fish consumption rates could be used, including evaluating risks, setting standards, and determining and evaluating remedial action alternatives. Chapter 6 summarizes some of the more important policy choices that arise in those situations. Ecology decided to include Chapter 6 in order to highlight the interactions between scientific information and the policy choices associated with using that information in environmental decision-making. This meeting is to discuss scientific questions; questions of policy are being addressed elsewhere.

Question for discussion

- What are your scientific concerns surrounding Ecology's use of the information in the revised TSD to support MTCA cleanup decisions?

Discussion

One participant asked if the TSD analyzes fish consumption rates of marine mammals. Ecology clarified that it does not, and several participants agreed that this issue is beyond the scope of this document. Still, others noted that the TSD may be used for marine mammal consumption and cleanup standards in the future.

Another person asked if suppression was addressed in the document. Ecology stated there is a section that discusses suppression, but the document does not include a quantitative analysis. Some participants noted the challenge in applying suppression to a specific site using a default rate. Ecology stated there is a section in chapter 6 addressing potential scientific concerns with site specific settings.

The group also discussed how Ecology can include new studies in the TSD once it is finalized. Several people suggested that when additional studies become available in the future, Ecology could post links to these studies on the agency's website.

Discussion on Additional Topics

Angie opened the discussion to participants with any additional concerns or questions. One person asked if there will be any tribal representatives participating in the overall fish consumption rate discussion going forward. Ecology stated that Tribes are participating in government-to-government consultation on this topic, and they are available to answer any questions from tribal members. One person asked about the participation of environmental groups in today's meeting, and Ecology noted that the environmental group representative from the first meeting had not been in contact regarding the second meeting.

Ecology updated the group on the Surface Water Quality Policy Forum meeting on Dec. 10, 2012. The Forum is planning educational meetings followed by discussions of policy topics. Various discharge scenarios will be used to illustrate the issues. Policy questions around fish consumption rates will be discussed tentatively in the late spring of 2013.

Wrap-up and Next Steps

Ecology will be weighing comments received from this group and from the public on the Technical Support Document and making revisions as necessary. Additional analyses may also be conducted, based on suggestions from participants and the public. Ecology thanked the group for their participation and effort in the process.