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ADMINISTRATION

MEMORANDUM

TO: Trey Glenn
Director, Environmental Management

FROM: M. Barnett Lawley
Commissioner, Conservation and Natural Resources

SUBJECT: Comments on Questions for the EMC Cancer Risk Advisory Panel

Since the majority of the 33 questions posed to members of the EMC Cancer Risk Advisory Panel are of a highly technical nature within the fields of public health and environmental science, we are not adequately qualified to comment on most of them. However, the following four questions do relate to concerns that we have with regard to this issue.

Question #5:
It is possible that some commercial fisheries, both freshwater and marine, could be adversely impacted if more stringent standards are accepted with regard to fish and shellfish consumption advisories.

Question #12:
We have no direct data to contribute with regard to the daily per capita consumption of freshwater fish in Alabama. However, our last survey of Alabama freshwater anglers that was conducted in 2002 indicated that there was a downward trend in the harvest for a number of fish species. Anglers were particularly reluctant to harvest largemouth bass. The most popular fish for harvest and consumption were crappie and catfish.

Question #19:
On the matter of consumption rates for freshwater fish, we have some concern that the value that is presently used, 30 grams/day, may be too high. This rate is nearly twice the amount as the EPA post-2000 national average of 17.5 grams/day. The 30 grams/day rate may be valid for some segments of Alabama's population but our own subjective information indicates that the recreational harvest of freshwater fish for consumption purposes has declined in the last fifteen years.

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Question #30:
With regard to the ADEM fish tissue sampling system, Wildlife and Freshwater Fisheries has previously expressed concerns that the species of fish that were collected and analyzed for this program did not necessarily represent the species of fish that were most likely to be consumed by the public. As discussed for Question #12, largemouth bass are now much less likely to be harvested for consumption as they once were, yet this species is the one that is most often sampled. In addition, many of the freshwater species that are commercially harvested for human consumption such as buffalo, carp and catfish are not routinely sampled and analyzed to this degree.