



March 17, 2011

Andrea Matzke
Oregon DEQ
Water Quality Division
811 SW 6th Ave
Portland, OR 97204.

RE: Fish Consumption Values and DEQ's proposed rulemaking.

Dear Ms. Matzke:

CropLife America is pleased to provide comments in response to the Oregon Department of Environmental Quality proposed rulemaking to revise the state's effective human health toxics criteria are based on a fish consumption rate. Like the Department of Environmental Quality, we actively support the ideal of water quality standards that protect people from adverse health effects as a result of consuming fish and water from Oregon streams and lakes. Additionally, we echo that the objective of the rulemaking is to allow DEQ and other agencies to implement the water quality standards in a manner that is cost effective and achieves meaningful environmental results.

CropLife America (CLA) is the not-for-profit trade organization representing the nation's developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the United States. Our member companies produce, sell and distribute virtually all the crop protection technology products used by American farmers and other consumers. Our membership contains technical experts in the areas of pesticide exposure and risk assessments. We are committed to the safe and responsible use of the industry's products in order to provide safe and abundant food, as well as for the control of insect and plant disease vectors for the protection of human health, all providing valuable benefits back to the consumer.

Regarding the specifics of whether 175 g fish and seafood/day is representative of a particular subpopulation in Oregon, it is not possible for us to confirm. We do note however, the value of 175 g/d is an extreme outlier compared to other published consumption values of seafood, worldwide. For example, the World Health Organization (WHO) has published a set of 13 World Regional Diets based on GEMS Statistical Data (<http://www.who.int/foodsafety/chem/gems/en/index1.html>). The summed value for average daily intake in various regions of the world is listed with an average of 31 g/day for fish and seafood (includes marine and freshwater fish and crustaceans); the maximum fish consumption value is 71 g/day for countries such as Korea and Japan. Thus the proposed Oregon subpopulation consumption number is 5X the global average and 2.5X the global maximum. (In addition, it is noted that the original value of 17.5 g/day proposed is more consistent with the 24.8 g/day reported for the US in the WHO

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diet summaries.) Given the potential broad impact of the water quality decisions and the extreme nature of the 175 g/day proposed, CLA does question if the proposed risk assessment to protect a specific subpopulation in this case is the appropriate vehicle for the overall population. Have other options been explored?

Thank you for considering our comment. Please contact Wendelyn Jones at wjones@croplifeamerica.org or at 202-296-1585 if you have any questions.

Sincerely,

Cheryl B. Cleveland

Cheryl B. Cleveland, Ph. D.
Chair, CLA Dietary Assessment Working Group
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Wendelyn Jones

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