

Idaho Aquaculture Association Inc.

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Paula J. Wilson, Hearing Coordinator
Department of Environmental Quality
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November 7, 2013

Re: 58.01.02 - WATER QUALITY STANDARDS, DOCKET NO. 58-0102-1201

Specific Comments on:

Boise State University PPC/IDEQ DRAFT Final Report - Idaho Fish Consumption Rate Recommended Sample and Questions

Dear Ms. Wilson:

On behalf of the members of the Idaho Aquaculture Association, I would like to submit the following comments concerning phrasing in the paragraph quoted below, taken from the Boise State University PPC/IDEQ DRAFT Final Report - Idaho Fish Consumption Rate Recommended Sample and Questions.

Page 25 – Idaho Caught Fish, paragraph 1 states:

“This questionnaire seeks to identify the water from which the fish was caught. The majority of finfish and shellfish sold at restaurants or at markets do not live in Idaho waters. There is one exception, trout. Boise State University recommends that all trout, regardless of how the respondent acquired the trout, be considered as grown in Idaho waters.”

We believe the last sentence in the paragraph above is misleading and will lead to erroneous interpretation of the results collected from survey questions 6A and 9B.

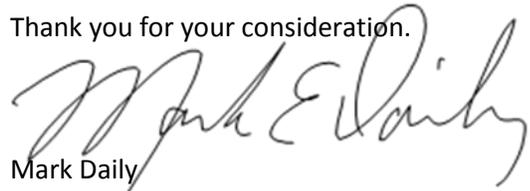
The purpose of the fish consumption rate survey requested by IDEQ is to determine if the fish consumption rate found by the survey is protective of all who consume fish from Idaho surface waters. Idaho farm-raised trout (defined as market trout) are not grown in “Idaho waters” according to the designation of Idaho waters in this negotiated rule making. For the purposes of this specific survey, “Idaho waters” refer to rivers, lakes, streams or reservoirs where fish that belong to the state are caught for recreation and/or subsistence, and subsequently consumed. These same rivers, lakes, streams and reservoirs may be contaminated with substances that may affect the health of people who eat those fish. This negotiated rule making relates to the amount of fish consumed that are taken from state surface waters and whether or not state water quality criteria are protective based on a state-wide fish consumption rate.

Idaho farm-raised trout should not be confused or identified with trout taken from state waters with regard to this rule making, including the survey instrument. Idaho farm-raised trout are grown in spring water-fed ponds under very controlled conditions. The U.S. Food and Drug Administration (FDA) has the primary federal responsibility for the safety of seafood products in the US, including Idaho farm-raised trout. In 1997 the FDA adopted a regulation (21 CFR Part 123) that required all seafood processors to utilize the preventive system of food safety controls known as HACCP (Hazard Analysis Critical Control Point). Seafood was the first food commodity in the U.S. to utilize this science based system of preventive food safety controls.

In contrast, a wide variety of fish and shellfish are harvested by individuals for their own or their family's consumption. The National Academy of Sciences estimates that one-fifth of the fish and shellfish eaten in the U.S. comes from recreational or subsistence fishing in the ocean, in marine bays or estuaries, or in freshwater lakes, ponds, rivers or streams. Non-farmed products (those caught for recreation or subsistence) are not subject to the same regulations as commercial seafood products, such as Idaho farm-raised trout. Idaho farm-raised trout is a high-quality, wholesome and safe food product. The Dietary Guidelines for Americans, 2010 (U.S. Departments of Agriculture, and Health & Human Services) specifically recommends farm-raised trout because of its nutritional value and safety as a food product.

Survey questions 6A and 9B attempt to make the distinction between farm-raised (market) trout and trout caught from state surface waters that may or may not be contaminated with harmful substances. We believe, however, that verbiage on page 25 will prejudice the interviewer to lump market trout and wild-caught trout as having been grown in Idaho waters of the same quality. Doing so will harm the reputation of Idaho farm-raised trout and will not provide an accurate representation of the source of fish consumed by the public.

Thank you for your consideration.



Mark Daily
President, Idaho Aquaculture Association