



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

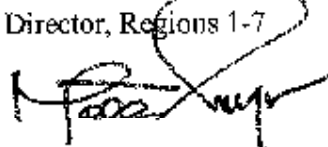


In Reply Refer To:
FWS/DNFHS

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Memorandum

To: Regional Director, Regions 1-7

From: Director 

Subject: Interim National Guidelines for Hatchery Management Decisions
Regarding Contaminants in Catchable-Size Fish Produced by the National
Fish Hatchery System

In response to human health concerns raised regarding contaminants in "catchable size" fish released by the National Fish Hatchery System (NFHS), the Service has developed *Interim National Guidelines for Hatchery Management Decisions Regarding Contaminants in Catchable-Size Fish Produced by the National Fish Hatchery System*. These Guidelines were developed by a cross-programmatic workgroup of Washington Office and field office experts, with participation by EPA and USGS, to provide Service managers with a uniform approach for making management decisions related to hatchery contaminant issues. The Guidelines are part of a pro-active, science-based strategy for managing contaminant issues related to National Fish Hatchery System production.

The Service's overall strategy includes (1) working with partners to develop Best Management Practices (BMPs) for healthy fish production, including development of "clean" feeds and facilities; (2) implementing national contaminant screening/monitoring to track progress and to identify hotspots; (3) conducting studies that provide a sound science basis for BMP development; and (4) providing States and Tribes with contaminant data, as available, for fish to be stocked or transferred from NFHS facilities, allowing partners to use this information in the context of State public health policy.

This strategy and the Interim Guidelines have been shared at the national level with partners, including the International Association of Fish & Wildlife Agencies (IAFWA) and the Service's National Tribal Liaison. State and Tribal partners have been encouraged to assist in the development of BMPs. The Interim Guidelines are intended to be used while further studies and BMP development form the basis for a more comprehensive policy.

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Please direct any questions or comments to the Chief, Division of the National Fish Hatchery System (703-358-1715).

Attachment(s)

Draft Interim National Guidelines for Hatchery Management Decisions Regarding Contaminants in Catchable-Size Fish Produced by the National Fish Hatchery System

The FWS is pursuing a pro-active, science-based approach for managing contaminant issues related to National Fish Hatchery System production. The Service's strategy for managing this issue includes: 1) working with partners to develop best management practices for healthy fish production, including development of "clean" feeds and facilities; 2) implementing national contaminant screening/monitoring to track progress and to identify hotspots; 3) conducting studies that provide a sound science basis for managing hatchery programs, such as identifying contaminant levels that effect reproduction and development for species reared for restoration and recovery; and 4) providing States and Tribes with contaminant data, as available, for fish to be stocked or transferred from NFHS facilities, allowing partners to use this information in the context of State public health policy (see "Guidelines").

Over the last year, several FWS Regions (1, CNO, 3, 5, and 6) have been involved in sampling contaminant levels in hatchery fish. This was primarily a result of press attention generated from the Hites paper in Science (2004) that raised concerns over contaminant levels in farmed Atlantic salmon with respect to human health. The Service received inquiries regarding contaminant levels in hatchery fish, and subsequently initiated sampling. However, the relationship between contaminant levels in fish reared at National Fish Hatcheries and FWS management decisions, such as whether to stock or transfer fish, was not resolved at a national level.

In order to frame this issue in terms of sound science, the Division of the National Fish Hatchery System, in collaboration with the Division of Environmental Quality, held a Hatchery Contaminant Workshop in February 2005. The workshop brought together scientists from FWS Fisheries, Environmental Contaminants, USGS, and EPA to discuss hatchery contaminant issues and develop recommendations for the Fisheries and Habitat Conservation Management Team, including interim guidelines for hatchery management decisions.

Interim National Guidelines for Hatchery Management Decisions Regarding Contaminants in Catchable-Size Fish Produced by the National Fish Hatchery System, were developed to assist NFHS managers in making decisions on when to stock and transfer fish, based on the human health implications of contaminant levels found in hatchery fish. While these interim guidelines were developed to address human health implications of hatchery stocking, subsequent guidelines will address hatchery management practices to address contaminant concerns for successful reintroduction programs and wildlife protection.

Guidelines:

- I. **Activities for which current contaminant information is available¹**
- a. Transfer / Stocking to States, Tribes
- i. Contaminant levels at or above levels that trigger “do not eat” State fish consumption advisory (based on State stocking and/or transfer consumption advisory levels):
Guideline – Fish should not be transferred or stocked.
 - ii. Contaminant levels below those that trigger “do not eat” State fish consumption advisory:
Guideline - Provide contaminant information to State or Tribe; provide fish if requested.
- b. Stocking – Federal lands
- i. Contaminant levels at or above levels that trigger “do not eat” State fish consumption advisory (based on State stocking and/or transfer consumption advisory levels):
Guideline – Fish should not be transferred or stocked.
 - ii. Contaminant levels below levels that trigger “do not eat” State fish consumption advisory (according to State Public Health Agency):
Guideline - Provide contaminant information to both State authorities and Federal land management agency, and consult on proposed stocking action. Provide fish if requested.
- c. NFHS Public Fishing Events
- i. Contaminant levels at or above those that trigger “do not eat” State fish consumption advisory (based on State of stocking/transfer consumption advisory levels):
Guidelines
 - Option 1 - Fishing event should be catch and release only
 - Option 2 - “Clean” fish should be brought in for the event from another facility
 - Option 3 – Fishing event should be cancelled.

¹ If State Consumption Advisory does not exist for contaminant of concern, consult with State, Tribe, or Federal Agency in which proposed activity will take place, and provide contaminant information in the context of EPA Consumption Advisory Guidelines.

- ii. Contaminant levels below those that trigger a "do not eat" State fish consumption advisory, but that do trigger a limited fish consumption advisory:

Guidelines

- Option 1 – Fishing event proceeds and State consumption advisory is posted.
- Option 2 -- "Clean" fish should be brought in for the event from another facility.
- Option 3 – Fishing event should be cancelled.

- ii. **Activities for which no data are available** - For situations in which no data exist, assume fish are acceptable for all uses, unless the facility is considered potentially at risk according to the Hatchery Contaminant Assessment Matrix²

All Activities (stocking/transfer to States, Tribes, federal lands; fishing events at NFHs) - High risk facilities should consult with States, Tribes, Federal land management agencies, as appropriate, to discuss potential risks. Contaminant sampling of fish should be conducted as soon as possible, based on available funds.

III. **Communication with Partners**

Because State Health Departments have the authority to issue Consumption Advisories for State waters, the FWS will defer to States in hatchery management issues that involve human health implications of stocking or transferring fish to State or Tribal waters. The FWS will regularly communicate and share relevant contaminant information with State, Tribal, and Federal partners with regard to National Fish Hatchery System stocking and transfer of catchable-sized fish.

IV. **Disposal of Contaminated Fish**

FWS guidance for storing, handling, and disposing of PCBs at all FWS facilities is described in Part 561 FW 9 of the U.S. Fish and Wildlife Service Manual. Part

² Hatchery Contaminant Assessment Matrix - A qualitative assessment of contaminant sources at NFH's is in progress. A matrix of facilities and pertinent variables will be captured, as a basis for prioritizing facilities for contaminant sampling. This matrix includes the 39 NFHUS facilities that reared catchable size fish in 2004, and will be expanded to all facilities. A number of variables, such as facility age, watershed contaminant source, etc. will be analyzed as part of this process.

561 FW 9 addresses industrial materials, such as electrical transformers, that are known to contain PCBs or other PCB articles that are highly contaminated but does not contain specific guidance for disposal of PCB-contaminated fish or other biota that contain low levels of PCBs ($\ll 50$ ppm). Therefore, until further guidance is developed, the recommended disposal options for hatchery fish that contain low levels of PCBs are (a) disposal in a Subtitle D Municipal Landfill, or (b) on-site burial following existing protocols for disposing of diseased fish (FWS Fish Health Policy Part 713 Fish Health: Exotic Disease Eradication Plan, Chapter 3. FWM 170, 02/15/95).

V. **Regional / National Press Releases** -- The following information is provided for use in Regional or National press releases or other information dissemination with regard to NFHS contaminant issues.

State/EPA/FDA Roles - Because State Health Departments have the authority to issue Consumption Advisories for State waters, the FWS will defer to States in hatchery management issues that involve human health implications of stocking or transferring fish to State or Tribal waters. The BPA has developed guidelines for states to use in developing fish consumption advisories. The EPA and FDA have agreed that EPA guidelines, and not FDA tolerances or action levels, should be used for developing fish consumption advisories. The FWS will rely on the EPA guidelines and state fish consumption advisories in developing goals for "healthy fish" and "clean feeds".

FWS Interim Policy Summary - The FWS is pursuing a pro-active, science-based approach for managing contaminant issues related to National Fish Hatchery System production. The Service's strategy for managing this issue includes: 1) working with partners to develop best management practices for healthy fish production, including development of "clean" feeds and facilities; 2) implementing national contaminant screening/monitoring program to track progress and to identify hotspots; 3) conducting studies that provide a sound scientific basis for managing hatchery programs, such as identifying contaminant levels that effect reproduction, development and survival of species reared for restoration and recovery; 4) providing States and Tribes with available contaminant data relevant to fish for stocking or transfer from NFHS facilities, allowing partners to use this information in the context of State public health policy; and 5) withholding fish with contaminant levels equal to or greater than levels that would trigger a State "Do not eat" fish consumption advisory.