



Duwamish Seafood Consumption Institutional Controls Implementation & Assurance Plan (ICIAP)

The Institutional Control Implementation and Assurance Plan (ICIAP) is a living road map of the U.S. Environmental Protection Agency's (EPA) seafood consumption Institutional Control (IC) program that will be used in promoting the Lower Duwamish Waterway (LDW) seafood consumption advisory. To reduce risks from consuming contaminated seafood from the LDW, the ICIAP strategies will be used before, during and after EPA's in-water cleanup actions. As a living document, the ICIAP strategies will be evaluated and adapted as needed.

The goal of EPA's Duwamish Seafood Consumption Institutional Control Program is to promote culturally appropriate, healthy actions that protect the health and well-being of fishing communities, especially pregnant women, nursing moms, and young children, from the contaminated resident seafood in the Duwamish River Superfund site.

The Seafood Consumption ICIAP implements Washington Department of Health's Seafood Advisory

Washington State Department of Health (WDOH) issued a seafood advisory for the LDW, which EPA uses as part of its seafood consumption IC for the Superfund Site. Seafood advisories recommend meal limits for eating seafood from a given waterbody to support healthy seafood consumption and reduce exposure to harmful contaminants. Seafood advisories may be developed in consideration of both health risks and benefits of fish consumption. The Seafood Consumption ICIAP describes the strategies to be used in promoting WDOH's seafood advisory message.

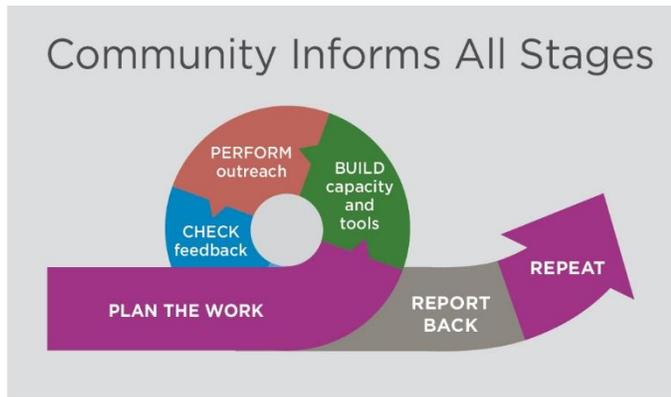
EPA's ICIAP strategies- recommendations from the Community Steering Committee

Targeted IC Strategies

- Duwamish Fishing Club focused on catching salmon
- School & youth programs grants to increase knowledge in youth
- Community centers & faith organizations grants to increase knowledge among the priority fishing communities
- Salmon cooking demonstrations and health clinic classes for food preparers promoting safe fish consumption

The Community Steering Committee (CSC) is comprised of Community Health Advocates (CHAs). CHAs play a central role in the IC program, because as members of the Duwamish/local seafood consuming community, they receive feedback and input from their broader community, which they bring to Public Health Seattle King County (PHSKC) and EPA. The CHAs have developed extensive knowledge about safe seafood consumption practices in the LDW Superfund Site and use that knowledge when promoting safe seafood consumption in their language communities. As community experts, PHSKC and EPA relied on CSC input to inform the ICIAP strategies.

Plan, Build Capacity & Tools, Perform, Assess, and Repeat



The ICIAP is a living document. It is designed to implement the target strategies, assess the effectiveness over time, and problem solve as needed. Throughout this continuum, the targeted seafood consuming community will be involved. PHSKC and EPA also recognize that the targeted community may change over time. PHSKC and EPA will work to include these new communities in the ICIAP program.

Input received on the draft ICIAP

Lower Duwamish Waterway Group (LDWG) would like to acknowledge and commend the work of the Community Steering Committee (CSC) and Seattle-King County Public Health in developing the ICIAP. It is clear from the document, the CSC has provided valuable input into the development of the plan and is dedicated to the process that Public Health and EPA has established. We feel the plan has a good strategy for achieving the goals of the LDW fish consumption institutional control program.

– The Lower Duwamish Waterway Group

Recognition of the efforts of PHSKC, the CHAs, and the CSC

We appreciate the recognition of the hard work of PHSKC, the CHAs and the CSCs over the past two years to develop the ICIAP. The effort to utilize community-based processes in this manner is unique to this Superfund Site. The commitment of the targeted seafood consuming community in advising the Agencies and promoting healthy seafood consumption within their communities is commendable.

A need to clarify the relationship between WDOH’s LDW and Puget Sound Seafood Consumption Advisories

Because of their expertise in developing and promoting health messages, EPA often uses seafood consumption advisories developed by state and local Public Health agencies at Superfund Sites. On the LDW Superfund site, EPA uses the seafood consumption advisory issued by WDOH as part of its fish consumption ICs. The most recent update to the State’s seafood advisories occurred in August 2018. PHSKC’s, which is the local public health agency, promotes WDOH’s advisory in its health outreach.

Several parties recommended changes to the “Fun to Catch, Toxic to Eat” program logo and LDW seafood consumption advisory tag line to emphasize limits on consuming certain species of salmon associated with the Puget Sound advisory. EPA consulted with the CSC, PHSKC and WDOH about these recommended changes.

Both the CSC and PHSKC clarified that the IC program does include the salmon consumption recommendations from the Puget Sound advisory. The CHAs promote the safe consumption of several species of salmon (coho, chum, sockeye, and pink) at a minimum of 2-3 meals per week; and limited consumption of Chinook and Blackmouth salmon. Since the health messaging involves more species-specific information, CHAs share this at in-depth outreach events targeting Duwamish fishers and seafood consumers. CSC members highlighted that this information is also incorporated into IC tools like the King County fishing guide.

In discussing the recommended changes to the program logo and LDW seafood consumption tag line, the CSC advised EPA not to make any changes. The CSC explained the proposed revisions to the program logo are confusing when translated into some of the core program languages (Cambodian, Vietnamese and Spanish). They stated that changing the logo and LDW fish advisory tag line would confuse fish consumers and overwhelm them with too much information to be understandable. The CSC also voiced concern that changing all the program materials with new language would undermine the community confidence in CHAs as experts in safe seafood consumption in the LDW Superfund Site.

Public Health staff also voiced concerns about changing the program logo and LDW fish consumption advisory tag line. They noted that the Fishers Study emphasized that the signage has not been effective in reaching the non-English and limited English proficient fishers who target resident seafood instead of salmon or other healthier options. For this population, communication through other trusted source like the CHAs is more effective than the signage. CHAs share the salmon information at outreach events.

EPA will continue to engage WDOH about the LDW seafood advisory as a component of the Seafood Consumption ICs. PHSKC will work with WDOH if the seafood advisory changes. EPA recommends that the Public Health agencies consult with the fishing community when revising seafood advisory language and mechanisms to promote the advisory.

Clarification on why some strategies are included of EPA's ICIAP program, and others not

In addition to the active cleanup efforts, EPA's Record Of Decision (ROD) identified ICs for seafood consumption as part of the remedy. The ROD's seafood consumption ICs include information about what seafood is safe to consume in the form of WDOH's seafood advisories, as well as education and outreach programs intended to reduce contaminant exposures caused by seafood consumption. The core components of EPA's ICIAP identify the key strategies that will be used to implement these ICs. As a living document, EPA will assess the effectiveness of these strategies over time, which may result in updates as necessary to achieve the ICIAP program goal.

Some of the strategies outside of EPA's ICIAP program were not selected in the ROD, including: offering healthy seafood options at food banks, providing coupons for healthy seafood, and offering transportation to alternative fishing sites. In developing the ROD, EPA received and responded to comments about its authorities to provide healthy alternatives of seafood as part of the Duwamish cleanup. EPA has not changed its position as stated in the Responsiveness Summary.

In implementing the ROD (including ICs), EPA will continue to evaluate the risks posed by seafood consumption. If these risks are not appropriately reduced or controlled by the selected remedy, EPA will engage: the parties implementing the cleanup; the community; Tribes; and other stakeholders as it evaluates

additional ICs necessary to provide the appropriate level of protectiveness. Inclusion of additional ICs (e.g. offsets) to the selected remedy would require a change to the remedy (e.g. ROD Amendment or an Explanation of Significant Differences), consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The CSC expressed an interest to initiate the ICIAP strategies as soon as possible and advised EPA not to pursue seeking a change to the remedy at this time as it would slow down implementation of the core ICIAP strategies.

What was the process to gather input on the ICIAP?

Involvement of the fishing community impacted by the Superfund cleanup is the cornerstone of this ICIAP program. It began in 2012 with the initiation of the Fishers Study, which identified those fishers and seafood consumers most likely targeting resident seafood in the Duwamish, their fishing practices, and drivers for their fishing behaviors. The Fishers Study recommended a community-based process for developing the ICIAP for seafood consumers, which was also supported by EPA's Community Advisory Group (Duwamish River Cleanup Coalition).

In 2017, EPA entered into a cooperative agreement with PHSKC to lead the development of EPA's ICIAP using community-based methods. PHSKC works with the targeted seafood consuming communities identified as most at risk in the Fishers Study, training members from those communities to be CHAs. In 2018, a subset of CHAs chose to participate in the CSC. These CSC members play an important role in communicating and consulting with their community members and using their community expertise in advising PHSKC and EPA on the ICIAP strategies.

The Healthy Seafood Consumption Consortium (HSCC) is another venue used to engage community members, community groups, and organizations working with the Duwamish fishers. CHAs, PHSKC and EPA utilized this forum to share updates on tools and efforts underway associated with the Cooperative Agreement. In June 2019, the CHAs presented the draft ICIAP strategies at the HSCC meeting and the draft ICIAP was shared with any interested party for input. The CSC has advised EPA that the HSCC was a successful mechanism for sharing the draft ICIAP.

In publishing this final ICIAP, EPA believes that the public involvement efforts it has undertaken in developing the document go well beyond those public involvement opportunities required by CERCLA, the National Contingency Plan, and suggested by relevant EPA guidance. We look forward to continuing to work with the affected fishing community members in implementing and assessing the effectiveness of the plan.

EPA asked the CSC for recommendations on disseminating the final ICIAP document to the LDW fishing community. The CSC advised EPA not to hold additional public meetings. Instead, the CSC recommended developing this fact sheet and the ICIAP executive summary in the core languages to be used by CHAs in outreach events.

For More Information

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