

February 17, 1998

James Haveman, Director
Michigan Department of Community Health
Lewis Cass Building
Lansing, MI 48913

Dear Director Haveman,

We appreciate the Department's decision to adopt a more protective basis for issuing fish consumption advice to women of child-bearing age and children. This important step brings Michigan closer to the prevailing regional consensus on appropriate public health policy regarding this issue. However, the state's apparent decision to remove detailed advisories from the fishing guide is a setback in efforts to educate the public about this important advice. Anglers and their families should be able to obtain this information by consulting the fishing guide itself.

We feel strongly that distribution of a second consumption brochure should supplement, not supplant, the detailed health advice traditionally found within the annual fishing guide. The guide should be able to stand alone in providing at least a meaningful summary of the Department's fish consumption advice, and we have been told this will not be true of the 1998 guide.

Your January 14, 1998 letter to several environmental groups implied that this year's fishing guide honors an agreement with the Michigan Legislature by providing "stronger cautions" for women. Your letter did not specify what the fishing guide will actually say, but your staff has informed us that it will merely mention the protective advice and refer interested persons to the separate brochure. This is not consistent with the agreement with the Legislature, which insisted that the Department include the specific advice for women and children in the charts published in the fishing guide. This would clearly not tax the space available in the fishing guide. We recommend that detailed consumption information be contained within the sportfishing guide.

A further concern is that the separate pamphlet will be inadequately distributed by fishing license vendors. Last year's MDCH brochure "What Women of Child-bearing Age Should Know About Eating Fish" was not distributed by several large fish license vendors on the grounds that it injected them into a controversy caused by the Department's resistance to the regional protocol. A copy of one internal memorandum from a vendor is enclosed to support our concern. To avoid such an outcome this year, we urge the Department to disseminate to fish license vendors a letter signed by the Governor urging distribution of the brochure along with the fishing guide.

Given that the 1998 fishing guides are already being printed, we hope the Department will take additional steps to insure wide distribution. To that end, we are writing to suggest several steps which your agency should take to assure that this new, important health risk information about consumption of contaminated sportfish from Michigan waters is received by vulnerable populations.

In addition to sending a letter to all license distributors, we ask you to:

- * Prepare and distribute a public service announcement noting the new protective advice and urging interested women to call a toll-free hot line to obtain copies of the brochure;
- * Provide detail about the new protective advice in the annual press release announcing the 1998 sportfishing advisory, including the specific water bodies affected and the number of meals of affected sportfish per month and year recommended for women based on the new protocol.
- * Distribute the brochure in the broadest possible way to assure women of child-bearing age actually receive the protective advice. In addition to the outlets you have named, we encourage you to distribute brochures:
 - In partnership with the Michigan State Medical Society to all physicians, with an emphasis on pediatricians and obstetricians;

- Through educational programs such as Head Start;
- To social service, prenatal care, and children's advocacy organizations such as the Healthy Mothers, Healthy Babies Coalition, and the Community Coordinated Child Care (4C) Association of Michigan;
- Through churches and the faith community;
- Through organizations representing minority populations such as the Michigan NAACP, Urban League, ACCESS, Detroiters Working For Environmental Justice, the City of Detroit's Neighborhood City Halls, American Indian Health and Family Services, and Native American tribes throughout Michigan;
- And through other avenues such as MSU Extension's EFNEP nutrition program, local Multi-Purpose Collaborative Bodies, and Health Maintenance Organization patient education programs.

We are sure you agree that the public is not served by continued clashes over the method by which advisories are derived. Although the new approach to sportfish consumption advice is a step in the right direction, we continue to believe that further steps are necessary to standardize the development of the state's fish consumption advisory. A process which provides for scientific peer review and public comment on the draft each year will help prevent controversies in the future. We look forward to working with you to assure that today's women and future generations do not suffer from exposure to long-lasting toxic compounds in sportfish.

Sincerely,

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