



December 19, 2013

Dear Members of the Pacific Coast Shellfish Industry,

The news about the China's ban on shellfish is extremely troubling and could not have come at a worse time. Please know that Pacific Coast Shellfish Growers Association (PCSGA) is tracking the issue and is actively involved. Our primary objective is to find out the relevant information, remove the ban, and take necessary steps to avoid this situation in the future. Our ability to resolve this issue is complicated by the fact that so many questions remain unanswered and it seems that information is changing on a daily basis. The purpose of this message is to share with you the information that is currently available as we continue to monitor the situation and communicate with the relevant state and federal agencies.

While the shipments of shellfish that resulted in this ban by China was wild harvest geoduck, the ban applies to "all double-shelled aquatic animals" imported into China from US portion of "area 67," which includes Alaska to mid-California. I am not aware of significant shipments of US west coast oysters being sent to China at this time, so the immediate impact of this ban falls primarily on the export of geoduck. Earlier reports indicated that geoduck from WA and AK tested high for PSP and arsenic. The WA product originated from Poverty Bay in Redondo. The AK product originated from the Ketchikan region. While we are waiting confirmation, NOAA believes that the Chinese reports indicate that the WA product tested above China's standard for arsenic and the AK product tested above the US standard for PSP.

The Washington Department of Health (WA DOH) and Alaska Department of Environmental Conservation Food Safety and Sanitation Program investigated the claims and have submitted their reports to FDA and NOAA. The reports conclude that testing data from both Alaska and Washington indicate PSP levels were well below US standards. Washington included the following statement regarding arsenic: "In 2007 geoducks were sampled and tested for arsenic in the harvest areas of Poverty Bay. Department of Health toxicologists reviewed the results and concluded that eating geoducks from these areas posed no apparent public health risk." NOAA has raised additional questions regarding the reports and is seeking more information from the state agencies. For Washington, NOAA has requested additional information and analysis regarding China's arsenic claims.

After federal review, these reports will be forwarded to the appropriate Chinese agencies. Once the report is submitted to the Chinese agencies, NOAA officials have told us that it can take a month or more to receive an official response from China, although we will do everything we can to seek a quicker response given the severity of the issue.

Together with the WA DOH, we are improving our understanding of arsenic. Historically, testing in Washington waters has shown arsenic levels to be low. State and federal agencies have therefore not considered arsenic in shellfish to be a significant health concern.

We are still trying to confirm the testing protocol used by the Chinese officials, how notification was handled, and why the entire west coast was closed as opposed to targeting just the area from where the implicated product was harvested. One key request that we have made to the federal agencies is that, if the issue is limited to one specific growing area in each state, that the other unaffected growing areas be immediately reopened for shipment.

PCSGA has engaged both state and federal leaders in seeking a swift resolution. Washington Governor Inslee and Washington Public Lands Commissioner Goldmark (DNR) have communicated with USFDA Commissioner Hamburg and NOAA Acting Administrator Kathryn Sullivan requesting their assistance in resolving this matter. Additionally, the shellfish authorities from both Alaska and Washington are working closely with USFDA, and WA Department of Agriculture is working with USDA Foreign Agriculture Services and NOAA staff in China to aid in resolving this issue.

Assistance is also coming from our federal delegation. Senator Cantwell (WA) and Representatives Kilmer (WA) and Heck (WA) have drafted a bicameral (from both chambers) letter requesting swift action from USFDA, NOAA, and US Trade Representatives. Additional supporters of the letter, including those from the Congressional Shellfish Caucus, are being identified and being encouraged to sign onto the letter. Additionally, it should be noted that we have been contacted by most of the Washington Congressional Delegation with offers of assistance as well as many state legislators. The Governor's office, WA DOH, DNR, WSDA the Department of Commerce have all been actively working on this issue and coordinating with the industry.

PCSGA is not only engaged in the process but is working to improve communications among all involved by hosting regular conference calls with state and federal partners to ensure a consistent and accurate flow of information. My priority is to minimize the impact of this situation on shellfish businesses both in the short and long term.

I hope you've found this message valuable. If you have additional questions or concerns about this issue or any other PCSGA effort, please contact me at 360-754-2744 or by email at margaretbarrette@pcsga.org.

Respectfully,

A handwritten signature in black ink, appearing to read 'Margaret P. Barrette', written in a cursive style.

Margaret P. Barrette
Executive Director