

Pilon, Janet

Subject: PFAS contaminated fish in Hamilton

From: Joseph Minor

Sent: Sunday, August 28, 2022 6:34 PM

To: clerk@hamilton.ca; clerks@hamilton.ca

Subject: PFAS contaminated fish in Hamilton

To: The Mayor and All Members of City Council c/o the Clerk

Can we please do a better job about telling people about the highly PFAS contaminated “do not eat” fish that live in the upper Welland River downstream from the Hamilton International Airport?

As you may remember, I have written Council on this subject before. I am writing again because a professional review of the recent scientific literature has concluded that the amounts of PFAS contaminated fish that it is “advisable” to eat need to be significantly reduced. I do not think this message is making it to people fishing in the area.

This is what they need to know:

Attention: People fishing in the upper Welland River, from the Hamilton International Airport downstream to Highway 6, the Binbrook Conservation Area, and all the way to Port Davidson in Niagara.

The highly contaminated areas are downstream from the former fire-fighting practice pad at the Hamilton International Airport. In order to comply with directives from Transport Canada, fire fighters sprayed large amounts of AFFF (aqueous film-forming foam) on practice fires in order to train with the use of AFFF. A popular type of AFFF had PFAS/PFCs/PFOS as a major ingredient, and the PFAS/PFCs/PFOS ran off the airport site and contaminated many kilometers of waterway downstream in the upper Welland River. The zone of high contamination is so long that it extends across Hamilton and on into Niagara. The Binbrook Conservation Area has highly contaminated fish and wildlife.

Many of the fish in this stretch of river are so highly contaminated with PFAS they are designated “do not eat” fish. According to the “current” online version of the Guide to Eating Ontario Fish:

In the upper Welland River (upstream of the Binbrook Reservoir):

“Women of child-bearing age and children under 15 years old” should not eat any pike, green sunfish, carp, or brown bullhead because they are highly contaminated with PFAS. Men and women past childbearing age should not eat carp over 22” because they are highly contaminated with PFAS.

In the Binbrook Reservoir:

“Women of child-bearing age and children under 15 years old” should not eat any black crappie, largemouth bass, smallmouth bass, channel catfish, pike (over 24”), white crappie (over 10”), carp (over 12”), or brown bullhead (over 12”) because they are highly contaminated with PFAS. Men and women past childbearing age should not eat carp over 22” because they are highly contaminated with PFAS.

In the stretch of the Welland River past the Binbrook dam down to Port Davidson:

“Women of child-bearing age and children under 15 years old” should not eat any white crappie, largemouth bass, or rock bass because they are highly contaminated with PFAS.

As bad as this PFAS contamination is, recent scientific studies have indicated that the amounts of PFAS/PFCs/PFOS that were deemed “advisable” to eat in the Guide were set too high (see below).

In Hamilton, Transport Canada has funded a million dollar, seven year (and ongoing) study called the “Hamilton International Airport - Offsite Risk Assessment”. Parts of the study have been released to the public in three pdfs. If you would like to see them, send me an eMAIL and I will send them to you.

The study reports that it is likely that the spraying of PFOS ended in 1989, and the spraying of all PFAS ended in 1994. Despite this, high levels of environmental contamination (including tainted fish) persist for many kilometres downstream to this day (33 years later). It is likely that this pollution will remain a significant problem for the foreseeable future.

An important part of the study was to evaluate whether or not the levels of PFAS/PFCs/PFOS currently used in the Guide to Eating Ontario Fish are consistent with the current state of scientific knowledge. The short answer is not even close. Adult men should eat no more than 30% of the amounts recommended in the Guide, and children and women of childbearing age should eat no more than 14% of the amounts recommended in the Guide. This means that the amounts listed in the Guide for men need to be decreased by more than 3.3-fold, and the amounts listed for children and women of childbearing age need to be decreased by more than 7.1-fold.

To see what applying this correction looks like for the fish in the upper Welland River, please see the pdf labelled “ERRATA_Tables”. As can be seen, the result is many more fish with decreased amounts of consumption.

I do not know when the Guide to Eating Ontario Fish will be corrected to bring it in line with current scientific knowledge.

Have you been told about these findings?

Transport Canada and the Ontario Ministry of the Environment, Conservation and Parks believe that their public notification regarding these results is “adequate”.

I am interested in learning what part of the public notification process is working. If you have heard about these findings, how were you informed?

If you have not been officially informed (e.g. by somebody other than me), please let me know when and how you are finally informed about the results of this major federally funded study.

Joe Minor

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