

GREAT LAKES INDIAN FISH & WILDLIFE COMMISSION

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• MEMBER TRIBES •

MICHIGAN

Bay Mills Community
Keweenaw Bay Community
Lac Vieux Desert Band

WISCONSIN

Bad River Band
Lac Courte Oreilles Band
Lac du Flambeau Band

MINNESOTA

Fond du Lac Band
Mille Lacs Band

November 3, 2016

International Joint Commission
234 Laurier Avenue West, 22nd Floor
Ottawa, Ontario K1P 6K6

International Joint Commission
2000 L Street, NW
Washington, DC 20440

RE: GLIFWC Support the *Preliminary International Joint Commission's Recommendations on Microplastics in the Great Lakes*

Dear Sir or Madam,

Great Lakes Indian Fish and Wildlife Commission (GLIFWC) staff submit the following comments on the *Preliminary International Joint Commission's Recommendations on Microplastics in the Great Lakes*. The comments do not preclude comments submitted directly by any GLIFWC member tribe pursuant to its individual sovereign prerogatives.

GLIFWC is an intertribal natural resource agency comprised of eleven federally recognized tribal governments¹. It was established in 1984 to assist its member tribes in implementing their treaty rights by providing support in the conservation and management of the natural resources subject to those rights, and protecting the habitats and ecosystems that support those resources. GLIFWC exercises delegated authority from its eleven member tribes regarding their treaty reserved hunting, fishing, and gathering rights.

GLIFWC's member tribes depend on healthy aquatic ecosystems and the fish, plants, and wildlife that these ecosystems support. The Ojibwe people have historically used and continue to use natural resources for spiritual, cultural, subsistence, medicinal, and economic purposes. Fishing and fish consumption are central to Anishinaabe culture. *Giigoonhyag* (fish) are a

¹ GLIFWC member tribes are: in Wisconsin -- the Bad River Band of the Lake Superior Tribe of Chippewa Indians, Lac du Flambeau Band of Lake Superior Chippewa Indians, Lac Courte Oreilles Band of Lake Superior Chippewa Indians, St. Croix Chippewa Indians of Wisconsin, Sokaogon Chippewa Community of the Mole Lake Band, and Red Cliff Band of Lake Superior Chippewa Indians; in Minnesota -- Fond du Lac Chippewa Tribe, and Mille Lacs Band of Chippewa Indians; and in Michigan - Bay Mills Indian Community, Keweenaw Bay Indian Community, and Lac Vieux Desert Band of Lake Superior Chippewa Indians.

significant subsistence food source for tribal communities. The practice of harvesting, sharing, and consuming fish is passed down from generation to generation and is an important part of the Anishinaabe *bimaadiziwin*, or traditional lifeway, which incorporates culture, spirituality, language, and traditions including the consumption of traditional foods.

It is well established that Native American tribal members in the Great Lakes region consume locally caught fish at a significantly higher rate than the general population. As a result, tribes are disproportionately vulnerable to the presence of contaminants. Fish throughout the ceded territories contain environmental contaminants, including microplastics, posing a serious threat to the health of tribal people and subsequently to the continuation of their traditional lifeway. There is no adequate substitute for fish consumption within the Ojibwe culture.

Microplastics are ubiquitous in the Great Lakes. When ingested by aquatic organisms, they can cause adverse physical effects. In addition, microplastics constitute a risk to both fish and human health due to their capacity to release adsorbed toxic chemicals following ingestion. These chemicals have the potential to cause direct toxic effects both in primary consumer and higher trophic level fish consumers due to bioaccumulation within the food web.

Thus, it is imperative for the health of tribal members and tribal cultures that the risks to environmental and human health associated with microplastics be fully understood and that further releases of microplastics into the Great Lakes be curtailed. The recommendations of the IJC to the Parties provide a balanced approach toward achieving these goals. It is within this context that GLIFWC staff support all of the IJC's recommendations regarding microplastics and encourage the federal governments of the U.S. and Canada to adopt and implement these recommendations.

We thank you for the opportunity to review and provide comments on this document.

Sincerely,

A handwritten signature in dark ink, appearing to read "Sara K. Moses". The signature is fluid and cursive, with the first name "Sara" being more prominent.

Sara K. Moses, Ph.D.
Environmental Biologist

Cc: John Coleman, GLIFWC Environmental Section Leader
Jonathan Gilbert, GLIFWC Biological Services Director
Ann McCammon-Soltis, GLIFWC Director of Intergovernmental Affairs