WHEREAS, the Lake Michigan Toxic Substance Committee of the EPA has reviewed the most recent toxicological and analytical data and has concluded that:

1. The effect level of PCBs in primates reproduction has been recently documented as less than 2.5 ppm and is much lower than has been observed in Standard test mammals (rats).

2. As a result of recent court decisions, the FDA is now enforcing the 5 ppm residue maximum in fish intended for human consumption and is likely to review the 5 ppm maximum allowable based on recent primate toxicological evidence.

3. The concentrations of PCBs in Lake Michigan fish are probably not decreasing and salmonids, particularly larger specimens, currently exceed the 5 ppm maximum allowable levels.

4. Reported efforts by the manufacturer to restrict distribution and efforts by the agencies to restrict discharges have not resulted in PCB reductions in the lake.

5. It is probable that wastewater sources of PCBs to Lake Michigan are ubiquitous, and at or below detectable levels.

6. An economic loss has already resulted to the commercial fishery as a result of PCB contamination. A much larger economic loss to the commercial and sport fishing industry is imminent in light of current FDA food recommendations and enforcement actions.

7. Non-Wastewater PCBs are still reaching the environment from incineration, land disposal and careless dumping.

8. The presence of PCBs in many processes and products continues to be widespread in spite of the Monsanto Chemical Company policy to restrict sale to closed systems.

9. Many uses of PCBs can be eliminated or replaced by using alternative chemicals, and

WHEREAS, both domestic and foreign PCB pose an environmental hazard, and

WHEREAS, current industry efforts to regulate PCBs have not proven effective in reducing environmental contamination, and

WHEREAS, recent analytical data establishes beyond reasonable doubt that PCBs are contaminating the environment as a result of nonessential uses, and

WHEREAS, virtually every use of PCB is replaceable by an alternative product or engineering design,

NOW THEREFORE BE IT RESOLVED THAT, member agencies represented in The Governors' Great Lakes Regional Interdisciplinary Pesticide Council seek legislation or Administrative Rules to ban all uses of PCBs, other than those uses considered essential after public hearing by appropriate legislative committee or regulatory agency.

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