

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department of Health
Virginia Administrative Code (VAC) Chapter citation(s)	_ VAC __-____ § 32.1-248.01
VAC Chapter title(s)	
Action title	Issue ENV-605 Advisory Guidelines for Fish with PFOS
Date this document prepared	10/4/2024
Regulatory Stage (including Issuance of Guidance Documents)	Issuance of Guidance Document

Cost Benefit Analysis

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

Impact on Local Partners

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 2: Impact on Local Partners

(1) Direct & Indirect Costs & Benefits (Monetized)	Code of Virginia § 32.1-248.01 requires the Virginia Department of Health to develop a written policy “that identifies the criteria and levels of concern for certain toxic substances that the Department will use in determining whether to issue a fish consumption advisory.” This policy establishes those guidelines for Perfluorooctane Sulfonate (PFOS). Fish consumption advisories are not binding requirements, but advise the public when consumption of fish containing certain levels of toxins is to be avoided for health and safety reasons. This guideline will have no direct or indirect costs or benefits to local partners.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(4) Assistance		
(5) Information Sources		

Impacts on Families

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 3: Impact on Families

(1) Direct & Indirect Costs & Benefits (Monetized)	Code of Virginia § 32.1-248.01 requires the Virginia Department of Health to develop a written policy “that identifies the criteria and levels of concern for certain toxic substances that the Department will use in
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	determining whether to issue a fish consumption advisory.” This policy establishes those guidelines for Perfluorooctane Sulfonate (PFOS). Fish consumption advisories are not binding requirements, but advise the public when consumption of fish containing certain levels of toxins is to be avoided for health and safety reasons. Direct Costs: If VDH issues a fish consumption advisory pursuant to this guideline, families may need to dispose of fish already obtained to avoid consuming the toxin. Indirect Costs: There are no indirect costs associated with this guideline. Direct Benefits: Families may avoid consuming fish containing higher concentrations of the toxin. Indirect Benefits: Families that avoid consuming fish containing concerning concentrations of the toxin may benefit from lower healthcare costs associated with avoidance of the health problems proven to be associated with the toxin.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)	Families will avoid the health problems associated with consumption of contaminated fish.	
(4) Information Sources		

Impacts on Small Businesses

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 4: Impact on Small Businesses

(1) Direct & Indirect Costs & Benefits (Monetized)	Code of Virginia § 32.1-248.01 requires the Virginia Department of Health to develop a written policy “that identifies the criteria and levels of concern for certain toxic substances that the Department will use in determining whether to issue a fish consumption advisory.” This policy establishes those guidelines for Perfluorooctane Sulfonate (PFOS).
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	Fish consumption advisories are not binding requirements, but advise the public when consumption of fish containing certain levels of toxins is to be avoided for health and safety reasons. Direct Costs: Small businesses, such as restaurants and fish and seafood providers, may see a direct cost if needing to dispose of fish in response to a consumption advisory. Indirect Costs: There are no indirect costs associated with this guideline. The Direct and Indirect Monetized Benefits associated with this guideline would be the avoidance of costs associated with the health effects of fish containing concerning levels of the toxin.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(4) Alternatives		
(5) Information Sources		

Changes to Number of Regulatory Requirements

Table 5: Regulatory Reduction

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance Document	Original Word Count	New Word Count	Net Change in Word Count
Advisory Guidelines for Fish with PFOS	0	2,117	2,117