

Congress of the United States
Washington, DC 20515

March 10, 2011

Honorable Margaret A. Hamburg, M.D.
Commissioner
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD, 20993

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Dear Dr. Hamburg,

As you may know, on January 31, 2011, the U.S. Department of Agriculture (USDA) and the Department of Health and Human Services (HHS) released the 2010 Dietary Guidelines for Americans (DGAs). The latest DGAs are “[b]ased on the most recent scientific evidence review” and now become the new foundation for federal nutrition policy and education. In light of these new dietary guidelines, we are writing to ask the Food and Drug Administration (FDA) to consider modifications to its 2004 advice about eating seafood for women who are or might become pregnant, nursing mothers and young children, so that they might be consistent with the overall health messages contained in the DGAs.

Seafood contains healthy nutrients like omega-3s and protein with less than a couple hundred calories per 4-ounce serving. In addition to protecting heart health, omega-3s make up a major part of the brain. Recent studies show babies of moms who eat seafood 2-3 times each week during pregnancy and breastfeeding have better eye and brain development than babies of moms who limit or avoid fish.

USDA and HHS state that “the benefits of consuming seafood far outweigh the risks, even for pregnant women.” The guidance emphasizes “the nutritional value of seafood is of particular importance during fetal growth and development, as well as in early infancy and childhood” and recommends “that women who are pregnant or breast-feeding consume at least 8 and up to 12 ounces of a variety of seafood per week.” The guidance goes on to recommend that obstetricians and pediatricians “provide guidance to women who are pregnant or breastfeeding to help them make healthy food choices that include seafood.”

These health benefits are balanced against concerns expressed in the 2004 FDA advice that certain seafood contains higher levels of methyl mercury that pose risks to an unborn baby or a young child’s developing nervous system. While weighing these considerations, the new DGAs note a consistent body of evidence that “the health benefits from consuming a variety of seafood in the amounts recommended outweigh the health risks associated with methyl mercury.”

We are pleased that in many ways the new Dietary Guidelines track the 2004 EPA/FDA advice. For example, they both note that fish and shellfish are an important part of a healthy diet and women and children should include appropriate amounts of seafood in their diets. The new DGAs and the 2004 advice both caution against eating four certain fish species containing higher

levels of mercury, identify fish low in mercury to include in a healthy diet, and advise women who are pregnant or breast feeding to consume up to 12 ounces of seafood per week.

However, we are concerned that the 2004 FDA advice about eating seafood did not strike the right balance of promoting the benefits of seafood while limiting intake of certain higher-mercury species. Since the FDA advice first came out in 2004, it has been widely misinterpreted as a warning for all Americans, and pregnant women in particular, to simply avoid seafood based on concerns over mercury. As a result, pregnant women have reduced their seafood consumption to an average of only 1.89 oz per week according to a 2008 FDA survey. This is less than one-fourth than the *minimum* amount of seafood now being recommended during pregnancy in the 2010 DGAs.

The DGAs emphasize the benefits babies gain when their moms eat at least eight ounces of seafood per week during pregnancy. This is an important health message that was lost in the 2004 advice. We encourage FDA to take the opportunity of the new DGAs to revise its 2004 advice to strike the proper messaging balance and support the findings of the DGAs emphasizing the net or overall health benefits of seafood consumption. When the federal government speaks in different voices about nutrition and food safety, it prevents the DGAs from achieving the full health benefits possible.

We ask you to create consistency with the current FDA advice on seafood and the DGAs as expeditiously as possible in order that federal agencies can speak in one voice to ensure that mothers and their health care providers receive the best nutrition advice for our next generation.

Sincerely,



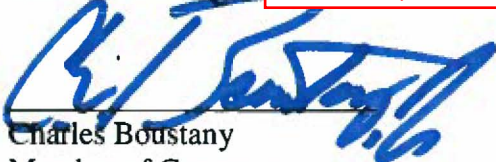
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Marietta (landlocked) (MD)



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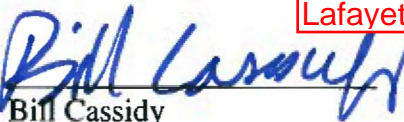
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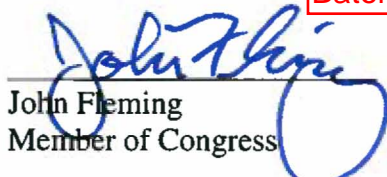
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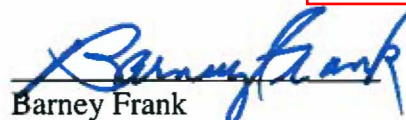
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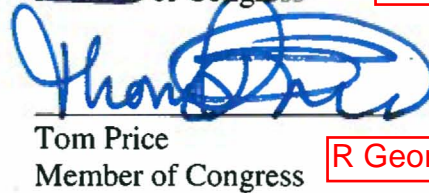
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CC: Honorable Kathleen Sebelius, Secretary of the Health and Human Services
Honorable Tom Vilsack, Secretary of the U.S. Department of Agriculture
Melody Barnes, White House Domestic Policy Council
Julie Moreno, White House Domestic Policy Council
Bruce Reed, Office of the Vice President Joe Biden
Robin Schepper, Office of the First Lady Michelle Obama