

Mercury Policy Project

June 25, 2014 Statement of Michael T. Bender, MPP Executive Director

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Good morning everyone. There's something really 'fishy' about the agencies' apparent fixation on health benefit studies while seeming to ignore recent findings of adverse effects of methylmercury at doses 10-fold lower than thought harmful a decade ago. Consequently, EPA and FDA have stuck to their outdated 2004 advice. This is particularly troubling advice for tuna consumption, since over one-third of exposure is from tuna, which is fairly high in mercury and Americans consume it so frequently.

We were most surprised that the government seemed to have ignored the fact that their recommended consumption of a 6 ounce serving of canned albacore tuna significantly exceeds EPA's reference dose for the entire week and also poses a similar risk to children. Therefore, we recommend that canned albacore tuna be placed on the do not eat list.

We are also concerned that the agencies continue to mislead the public by erroneously calling cod and canned light tuna low mercury fish. Cod (0.11 ppm) and light tuna have methylmercury levels (0.128 ppm) far above the overall average level in the US seafood supply as a whole (which FDA has calculated as between 0.07 and 0.08 parts per million.) Canned light tuna accounts for 11% of fish consumption in the U.S. and over 16 percent of methylmercury exposure, so particular attention is warranted.

And while canned light tuna has less methylmercury than canned albacore, it also contains far less omega-3 fatty acids, and thus is not a preferable alternative to canned albacore. Therefore, we recommend that pregnant women and children should not eat more than one 4 ounce serving of canned light tuna each week.

In addition, the new advice fails to recognize exposure risks for those who already eat a lot of fish. About 5 percent of Americans already meet or exceed the EPA/FDA's recommended fish intake (8-to-12 ounces per week) and about 10 percent of women of childbearing age have blood mercury levels above the level known to be associated with net adverse effects on cognitive development. People who eat fish often, including pregnant women, need targeted government advice that the more fish they eat, the more they should pay attention to choosing low-mercury varieties. The risks posed by

other persistent contaminants also add up for frequent fish consumers, and should be examined.

In summary, the EPA/FDA advice should provide clear information on fish with nutritional benefits but also highlight the higher mercury fish so that not only sensitive populations but everyone else (including other federal agencies) can understand this. For example, under recent pressure from members of Congress from the northeast, USDA may soon be purchasing dogfish, a type of shark that has higher mercury levels, for the National School Lunch Program despite the fact that the Maine Department of Health advises pregnant women and children to avoid dogfish and for everyone else to eat no more than 2 meals per month. Thank you.