



**NATIONAL
FISHERIES
INSTITUTE**

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Comments submitted electronically at DGAReview@nas.edu

To Whom It May Concern:

The National Fisheries Institute (NFI) is a science-based, non-profit organization dedicated to education about seafood safety, sustainability and nutrition. From vessels at sea to grocery stores and seafood restaurants, our diverse member companies bring delicious fish and shellfish to American families. NFI and its members support and promote sound public policy based on ground truth science.

NFI is active in promoting the importance of eating seafood regularly at all life stages including pregnancy and early childhood. We are, for this reason, particularly supportive of the inclusion of pregnant women and children from birth to 24 months in the 2020 Dietary Guidelines for Americans (DGA). We know that pregnant women are particularly open to behavior changes due to implications that eating behavior has on the unborn baby.ⁱ Parents of young children are also open to behavior changes as they aim to feed their children as healthfully as possible. We also know that expectant and new parents are especially risk averse and receive far too many negative and conflicting messages about nutrition and foods, particularly seafood.ⁱⁱ

The 2020 DGA offer a unique opportunity to provide clear, simple and sound nutrition guidance for pregnant women and parents of young children. Empowering these populations with actionable and sound nutrition advice has the potential to greatly improve public health. Nutrition during pregnancy can impact health outcomes as children grow, and good habits developed at a young age continue to improve the health of the child over their entire life.

The need for the nutrients in fish is especially high during pregnancy. During the last trimester, a fetus's brain and nervous system rapidly develops, requiring about 65 mg/day of DHA.ⁱⁱⁱ The heightened demand for DHA continues to two years of age.

The 2010 Dietary Guidelines Advisory Committee (DGAC) reviewed nine studies about the effects of maternal dietary intake of omega-3 fatty acids from seafood on health outcomes in infants and concluded that "moderate evidence indicates that increased maternal dietary intake of long chain omega-3 polyunsaturated fats, in particular docosahexaenoic acid (DHA) from at least two servings of seafood per week, during pregnancy and lactation is associated with increased DHA levels in breast milk and improved infant health outcomes, such as visual acuity and cognitive development." These findings were carried through in the 2015-2020 DGA.

Despite these health benefits, the U.S. Food and Drug Administration research shows the average pregnant woman in the U.S. currently consumes less than 2 ounces of seafood a week as compared to

the 8-12 ounces recommendation. This intake gap and the resulting omega-3 deficiency amongst pregnant women in the U.S. is an important education opportunity.

The amount of seafood consumed by young children in the U.S. mirrors these trends. Research from the Academy of Nutrition and Dietetics shows a mere 10 percent of U.S. children meet the 2015-2020 DGA recommended intake. While low seafood consumption amongst U.S. children is unfortunate from a nutrition perspective, too little seafood intake also negatively impacts life-long eating habits formed in early childhood. The World Health Organization advises feeding seafood to young children early on to help create healthy eating habits later in life. Recent changes to the American Academy of Pediatrics guidelines conclude parents can begin to introduce fish as a starter food to infants around age 6 months.

Since pregnant and birth-to-24 populations tend to be risk-averse, NFI supports the inclusion of real-world obstetricians, pediatricians and dietitians who work with pregnant women and parents of infants and children on the DGAC. It is imperative that there are Committee members who intimately understand the needs and fears of these populations, as well as how to effectively communicate with them.

We look forward to the next round of the DGA to provide clear, consistent and encouraging advice about seafood that pregnant women and parents of young children need, as well as guidance on how to include more seafood in their diets.

Thank you for the opportunity to comment on the 2020 DGAC and DGA processes. And, thank you for your commitment and thorough work to help encourage all Americans to live more healthfully.

Sincerely,



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ⁱ Davis, A. M., Wambach, K. A., Nelson, E. L., Odar, C., Lillis, T., Mckinley, A., & Gallagher, M. (2014). Health Behavior Change in Pregnant Women: A Two-Phase Study. *Telemedicine and e-Health*, 20(12), 1165-1169. doi:10.1089/tmj.2013.0374

ⁱⁱ Bloomingdale, Adrienne, et al. "A qualitative study of fish consumption during pregnancy." *American Journal of Clinical Nutrition*. 92 (2010): 1234-1240.

ⁱⁱⁱ Makrides, Maria. "Outcomes for Mothers and Their Babies: Do n-3 Long-Chain Polyunsaturated Fatty Acids and Seafoods Make a Difference?" *The Journal of the American Dietetic Association* 108 (2008): 1622-26.