



**NATIONAL
FISHERIES
INSTITUTE**

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Carole Davis
Co-Executive Secretary of the Dietary Guidelines Advisory Committee
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Comments submitted electronically at www.dietaryguidelines.gov

Dear Ms. Davis:

The National Fisheries Institute (NFI) is a 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.

As the Dietary Guidelines Advisory Committee (the Committee) gathers for its first meeting, we'd like to reflect upon the way seafood is characterized in the 2005 Dietary Guidelines for Americans (the 2005 Guidelines).

Executive Summary

- In the Fats section, fish is recommended as a healthful source of fat, notably for children and adolescents.
- In the Food Safety section, infants and young children, pregnant women, older adults, and those who are immunocompromised are told to avoid raw or undercooked fish.
- In the Discussion Section, fish are mentioned as an example of the importance of choosing variety among food groups because it contains fats that "may be beneficial in reducing cardiovascular disease risk."

Chapter 6: Fats

- Oily fish is mentioned as a source of long-chain omega-3 fatty acids, which "limited evidence suggests" are associated with reduced risk of dying from heart disease in the general population.
- Fish is recommended as a healthful source of fat, notably for children and adolescents.
- In the Discussion section, fish are mentioned as a consideration for the specific population group of people who have already experienced a cardiac event. "Evidence suggests that consuming approximately two servings of fish per week (approximately 8 ounces total) may reduce the risk of mortality from coronary heart disease."
- In the Discussion section, environmental contaminants in fish are mentioned as a consideration for the specific population group of women of childbearing age who may become pregnant, pregnant women, nursing mothers, and young children. This group is advised to "to avoid some types of fish and shellfish and eat fish and shellfish that are lower in mercury."

Chapter 10: Food Safety

- Raw fish is mentioned as a high-risk food for cross-contamination.
- The specific population group of infants and young children, pregnant women, older adults, and those who are immunocompromised is told to avoid raw or undercooked fish.

While fish is characterized as a healthful source of fat, the 2005 Guidelines lack a clear recommendation for Americans to eat more seafood. Recent survey data shows that 78 percent of Americans and 81 percent of women of childbearing age fail to eat seafood twice per week.ⁱ The Food and Drug Administration shows pregnant women eat just 1.89 ounces per week,ⁱⁱ far less than the amount associated with fetal brain and eye development benefits.ⁱⁱⁱ

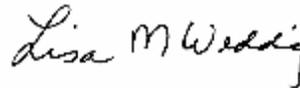
It is our hope that the body of scientific studies about the health benefits associated with regularly consuming seafood published within the last five years result in a clear recommendation for the general population to increase the amount of seafood they eat to at least two servings of a variety of fish per week. The population of women who are or may become pregnant should be specifically encouraged to eat plenty fish because, in addition to being a lean source of protein rich in a variety of micronutrients, seafood is one of the only natural sources of long-chain omega-3 fatty acids vital for optimal fetal brain and eye development.

As the Committee establishes their priorities, we ask that consumption of seafood and the unique nutrients it contains be given much due weight. We look forward to sharing scientific resources and participating in a dialogue about seafood through the duration of the Committee's term.

Sincerely,



Jennifer Wilmes, MS, RD
Manager, Nutrition Communication



Lisa Weddig
Director, Regulatory Affairs and Technical
Affairs

ⁱ Hicks, Doris, et al. "Consumer perceptions about seafood – an Internet survey." Journal of Foodservice 19.4 (2008): 213-226.

ⁱⁱ Choiniere, Conrad, et al. "Fish Consumption by Women of Childbearing Age, Pregnant Women and Mothers of Infants." Poster presented as part of the International Association for Food Protection 2008 95th Annual Meeting, Columbus, Ohio, 3-6 August 2008.

ⁱⁱⁱ Hibbeln, Joseph R., et al. "Maternal seafood consumption in pregnancy and neurodevelopment outcomes in childhood (ALSPAC study): an observational cohort study." The Lancet 369 (2007): 578-585.

Jacobson, Joseph L., et al. "Beneficial Effects of a Polyunsaturated Fatty Acid on Infant Development: Evidence from the Inuit of Arctic Quebec." The Journal of Pediatrics 152.3 (2008): 356-364.

Oken, Emily, et al. "Associations of maternal fish intake during pregnant and breastfeeding duration with attainment of developmental milestones in early childhood: a study from the Danish National Birth Cohort." American Journal of Clinical Nutrition 88 (2008): 789-96.