



March 26, 2015

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5360 Fishers Lane, Room 1061  
Rockville, MD 20852

**RE: "Fish: What Pregnant Women and Parents Should Know" (Docket FDA-2014-N-0595-0001)**

To Whom It May Concern:

I am writing to provide public comments on behalf of the Gulf Seafood Institute (GSI), a trade association with members in the five Gulf states representing every aspect of the seafood industry – harvesters, processors, wholesalers, retailers, restaurateurs and the charter-for-hire community. We appreciate the opportunity to provide comments on the Food and Drug Administration's (FDA) draft fish consumption advice entitled "Fish: What Pregnant Women Should Know".

Formed in 2013, the GSI came together to protect the Gulf's unique culture and environment while elevating the Gulf seafood brand with consumers, customers and policy leaders through advocacy, education and science. All our members share the common value of working to make healthful and abundant Gulf seafood available to all. Additionally, GSI seeks to bolster fisheries science and research to help preserve the Gulf seafood resource and contribute to the longevity of our industry.

We are pleased to see that the FDA in its 2014 draft advice is, based on the latest science, encouraging pregnant women to eat more seafood (a minimum of 8oz/week) and highlighting the health benefits associated with increased consumption of omega-3 fatty acids, including DHA (omega-3s), found in seafood. Previous FDA advice regarding seafood consumption has been confusing and has deterred pregnant women from eating seafood—thus reducing access to these beneficial nutrients for babies and even raising concerns about the unintentional negative health consequences for babies and their mothers.

GSI has always believed a seafood rich diet is beneficial to one's health, and we believe that Americans would benefit from including more Gulf seafood in their diets. We are strongly encouraged by the changes made in the draft advice, yet there still seems to be a lack of clarity regarding the specific health benefits of omega-3s—specifically, optimal neurodevelopmental and eye formation. Pregnant women are eager to understand how making healthy nutrition decisions benefits their babies. As such, we recommend clear language emphasizing *how* omega-3s help babies as they develop in the womb.

Further, GSI would also like to see a clearer description on the recommended amounts of seafood to be consumed per week. As stated above, the suggested 8oz/week minimum of a variety of seafood is a marked improvement over the previous advice, but what exactly is 8oz? For many, visualizing an ounce (or eight) is difficult to do; whereas recommending that pregnant women consume a minimum of two to three meals a week provides a healthful visual for consumers.

Based on the latest science conducted by FDA, GSI is skeptical of any “fish to avoid” mentions in consumer advice. The FDA’s net effects report concluded that all commercially available seafood is healthy and safe. Despite improved communications regarding the net benefits of seafood, any language warning pregnant women about certain rarely eaten species of fish will scare women away from eating fish altogether. Pregnancy is a time when women are understandably risk-averse, and having federal guidance with unclear language about which fish to avoid causes apprehension about consuming any seafood out of fear of accidentally choosing the wrong one. This is confusing to consumers because the four fish pregnant women need to avoid (shark, swordfish, king mackerel and tilefish) are rarely eaten by the general population, let alone pregnant women.

One area that FDA’s own science (the 2014 Net Effects report) appears to conflict with its consumer advice is that canned tuna—both light and albacore—are safe for pregnant women and developing babies. In fact, the report states that up to 56 ounces (more than 4.6 pounds!) per week is safe for mom and baby. Additionally, the 2015 Dietary Guidelines Advisory Committee recommends in their March 2015 report that the FDA re-evaluate its 6-ounce limit on albacore to reflect the latest science that shows more than four times this amount is safe and healthy<sup>1</sup>. Canned tuna may be the only option that some women have for getting those critical omega-3s, particularly women in lower income populations, who may not have access to higher-priced fish like salmon and sardines.

GSI would also appreciate it if the FDA would take into account other health benefits from eating a seafood rich diet. Such as, how emerging research shows that selenium, a mineral naturally found in fish, may help protect against any toxic or adverse effects of mercury in the body. Selenium binds to mercury, preventing it from binding to other compounds, even those found in the human body, like brain tissue.

It is important that FDA completes this updated advice quickly to reflect the importance of eating seafood for the healthy development of a baby during pregnancy. Doing so will help get more Americans to eat more seafood and have access to the unique health benefits that a diet rich in omega-3s has to offer. More Americans buying seafood will also directly help the economy of the Gulf region that has suffered immensely since the 2010 oil spill, which also gave consumers unnecessary concerns with the safety of Gulf seafood.

GSI appreciates the opportunity to provide these comments and recommendations. We thank the FDA for its hard work over the years. We are hopeful that the final advice will offer precise and succinct language that removes the confusion that exists in the current advice. If you have any questions, please do not hesitate to contact me at 305-322-9811 or [Margaret@GulfSeafoodInstitute.org](mailto:Margaret@GulfSeafoodInstitute.org).

Sincerely,



Margaret Henderson  
Executive Director

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<sup>1</sup> <http://www.health.gov/dietaryguidelines/2015-scientific-report/>