

Protecting Consumers from Mercury in Fish: The New England Fish Advisory Forum May 10, 2004

Comments by Sheila Dormody, Rhode Island director of Clean Water Action and New England Zero Mercury Campaign Coordinator

NEZMC and New England Goal

- The New England Zero Mercury Campaign formed to support the New England Governors in their goal to “virtually eliminate” mercury emissions. In 2003, the New England Governors and Eastern Canadian Premiers (NEG/ECP) reached the midway mark in pursuit of their goal to virtually eliminate mercury emissions within the region.
- Since their 1998 commitment, their coordinated efforts have led to a 55% reduction in mercury emissions. However, while the need remains great, achieving the second half of their goal will likely prove to be significantly more challenging.
- While emissions have been reduced, the danger of health risks from eating mercury-contaminated fish remains high.

Federal Action on Mercury Emissions

- The position on mercury emission reductions on the federal level is even bleaker. Coal burning remains the largest source of mercury emissions nationally. Rather than help to reduce this major health threat, the Environmental Protection Agency issued a proposed rule under the Clean Air Act that will achieve mercury reductions significantly less than what existing law requires, and certainly less than what is necessary to protect public health.
- Specifically, the EPA has proposed a cap-and-trade system to manage mercury emissions. Not all plants would have to reduce their harmful emissions of mercury and some, like New Hampshire's, could even increase. This would certainly have a significant impact on fish in local waterbodies.

Lack of Leadership from the FDA

- The newly revised "dietary advisory" from the FDA for mercury in fish is a step in the right direction, however it is neither science-based nor protective enough for women and children.
- Following FDA's advice and eating 12 ounces of certain higher mercury fish in a given week could result in exposures well over the EPA reference dose. In particular, the advice would inadequately protect sensitive populations from average mercury levels in canned albacore and fresh tuna.
- The revised advisory says albacore can safely be consumed once a week. Yet, based on FDA's own recent test results, which found an average of 0.358 part per million (ppm) mercury in albacore tuna, a single serving would likely result in a weekly exposure well above the EPA's reference dose for many consumers. This

EPA reference dose has been reviewed and endorsed by the National Research Council as science-based and appropriately protective.

- A 22 pound toddler eating only 2 ounces of albacore tuna per week with the average mercury concentration found by FDA, would have an intake nearly 3 times the EPA's RfD.
- A 130-pound woman who eats 6 ounces of albacore tuna [a serving recommended in FDA's draft advisory] would get one and one half times the RfD.
- Canned tuna is consumed in 90 percent of American households and accounts for 25-35 percent of all fish consumption in the U.S. It is essential that these consumers understand the dangers of mercury exposure from tuna. We are glad that each of the New England states is addressing tuna consumption in advisories, but need to make sure that information gets to the right people.
- Additionally, while FDA's advisory mentions children, the advice is still aimed primarily at women of childbearing age. It suggests applying the same guidelines offered for adult women to children, except that the "serving size should be smaller." In this world of "supersizing," this vague advice is too understated for parents trying to keep their children safe from mercury exposure.
- Parents need specific 'Don't serve to children' guidance based on the mercury content of different fish and related to the child's weight.

Need to Communicate Advisories More Effectively

- Although many states have issued strong, protective warnings about mercury in fish, the problem is that not enough people know about it. The best way to get the information out is to require warnings to be posted where people purchase fish.
- Although state health departments have issued warnings about mercury contaminated fish for years, the New England Zero Mercury Campaign survey results have shown that New Englanders do not have the information they need to protect pregnant women and young children from mercury-contaminated fish.
- We commend Wild Oats, the town of Swampscott, and other voluntary efforts to post point of sale advisories state health agencies to require all restaurants, grocery stores, and markets that sell fish to post fish consumption advisories for mercury.
- Across the six states, 1400 New Englanders were asked three questions about their knowledge of government advisories about mercury contamination of fish.
- 36% of those surveyed were unaware that the government advises people to limit eating certain fish due to mercury.
- Even fewer knew the specifics about which fish to avoid to prevent mercury exposure to women of childbearing age and young children.

- 45% were unaware that women of childbearing age and young children should not eat swordfish, tuna steak, and many freshwater fish because of mercury contamination.
- 59%, a clear majority, were unaware that pregnant women and young children should limit consumption of canned tuna, one of the most consumed fish in America, because of mercury contamination.
- The campaign's survey results are generally consistent with the findings of Food and Drug Administration (FDA) scientists that between 30% and 50% of women of childbearing age are not aware of exposure risks to mercury through eating fish.
- We are extremely concerned that one third of the people surveyed did not know that there is a problem with mercury in fish, and that almost half didn't know which fish pregnant women and young children should avoid entirely.
- About a dozen stores and restaurants across the region have joined the SMART Fish Campaign and voluntarily agreed to post advisories for their consumers.
- We strongly encourage our state health agencies to ramp up efforts to inform the public about this danger. The most effective way to do this is to require that stores and restaurants post warnings for people to see when they are purchasing the fish.

Contact information

Sheila Dormody
Rhode Island director
Clean Water Action
741 Westminster St.
Providence RI 02903

p: (401) 331-6972

f: (401) 331-7072

sdormody@cleanwater.org

www.cleanwateraction.org