

February 1, 2005

Institute of Medicine
Food and Nutrition Board
Committee on Nutrient Relationships in Seafood:
Selections to Balance Benefits and Risks

To the Food and Nutrition Board and Prospective Members of this Committee,

The undersigned organizations are writing to express our concerns about the composition of the newly-formed Committee on Nutrient Relationships in Seafood: Selections to Balance Benefits and Risks. Specifically, we are protesting the absence of legitimate consumer representation.

Seafood is a unique commodity whose numerous species carry a large variety of risks. Environmental toxicants, like mercury and PCBs, are readily picked up in the tissue of fish and can reach high levels in predatory fish, like tuna, shark, and swordfish. Outbreaks can result from naturally occurring toxicants, such as scombrototoxin and ciguatera toxin in finfish, and microbial hazards, such as *Vibrio* bacteria and Noroviruses, in shellfish. In finfish, harvesting conditions or improper handling after harvest can cause toxins to form. Moreover, once formed, the toxins are not destroyed by cooking. Shellfish can become contaminated with bacteria and viruses in harvesting beds.

As a result, seafood is one of the leading causes of food-borne illness outbreaks in the U.S., as documented in the 2004 edition of *Outbreak Alert*, published by the Center for Science in the Public Interest (available at http://cspinet.org/foodsafety/outbreak_report.html). Between 1990 and 2002 (including new data from the Centers for Disease Control and Prevention (CDC)), a total of 806 food-borne illness outbreaks and 8,516 cases were linked to seafood and seafood dishes:

- 513 seafood outbreaks and 2,717 cases were linked to finfish such as tuna and grouper;
- 119 outbreaks and 3,017 cases were linked to molluscan shellfish including oysters and clams;
- 117 outbreaks and 2,069 cases were linked to seafood dishes like crab cakes and sushi; and
- 57 outbreaks and 713 cases were linked to other seafood such as shrimp and lobster.

The National Academy of Sciences Institute of Medicine has already contributed to our understanding of seafood safety issues with its 1991 report, *Seafood Safety*. Since

then, significant new scientific studies have evaluated the benefits and risks of seafood consumption. The work of this new committee will help assess the well-known benefits of seafood consumption against the risks associated with certain varieties.

We have only one goal: Consumers must be given accurate risk information specific to each species, without which they cannot make informed choices that allow them to maximize the health benefits of seafood consumption.

That's why the consumer representative on this panel is such an important position. The person or persons selected for this role must have as their only orientation giving consumers a clear and accurate evaluation of benefits and risks of seafood. They must be entirely free of associations with producer interests.

Sadly, that has not happened in this case. By selecting Jennifer Hillard of the Consumer Alliance of Canada, the IOM has chosen someone whose past record suggests close ties with food producing companies as well as a wide range of industry trade groups. According to her own resumé, Ms. Hillard served as a representative of the Food Biotechnology Communications Network, which Canadian news reports have called a "genetically modified foods industry lobby." Her organization has also received funding from Monsanto and numerous trade groups, such as the Canadian Cosmetic, Toiletry and Fragrance Association, and the Canadian Drug Manufacturers Association. If she has any special knowledge about the issues under discussion here, it is not apparent from her background.

Her appointment is especially troubling since numerous scientifically-trained officials from legitimate consumer organizations in the U.S. offered to serve on this committee. That the IOM would turn to Canada to provide the only consumer representative for a report intended to inform U.S. consumers adds insult to injury. We urge you to add additional consumer representatives that are knowledgeable in the full range of risks and benefits associated from seafood consumption.

We close by noting that several scientists on this committee are members of the Institute of Food Technologists, a group whose board is heavily dominated by industry representatives. In the name of balance, which is a requirement of the Federal Advisory Committee Act, we hope you take some action to correct the lack of legitimate consumer representation on this committee.

Sincerely,

(see next page)

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