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Committee on World Food Security High Level Panel of Experts (HLPE) on Food Security and Nutrition
Comments re: Nutrition and Food Systems - HLPE DRAFT V0 (24 October 2016)
Submitted electronically via cfs-hlpe@fao.org

To HLPE members:

The National Fisheries Institute (NFI) appreciates the opportunity to comment on the HLPE draft report on Nutrition and Food Systems. NFI is a non-profit organization dedicated to education about seafood safety, sustainability, and nutrition. The diverse members of NFI source fish and shellfish from around the globe to provide families with one of the planet's most healthful proteins. NFI supports and promotes sound nutrition policy based on scientific research.

After reviewing the draft report of Nutrition and Food Systems, we would like to highlight the following points:

1. Any conclusions about the role of seafood in food systems should prioritize its important role in human health across all ages.

Fish/seafood is noted as a food to encourage in each and every international recommendation summarized in Table 1 (page 20). Seafood is a source of protein and omega-3s, which are vital beginning with the first 1,000 days for brain development and continue to play a role in both prevention of malnutrition as well as chronic diseases like heart disease and obesity. The World Health Organization and Food and Agriculture Organization of the United Nations Joint Expert Consultation on the Risks and Benefits of Fish Consumption concluded in 2011 that international health authorities should emphasize not only the "net neurodevelopmental benefits to offspring of women of childbearing age who consume fish, particularly pregnant women and nursing mothers," but also "neurodevelopmental risks to offspring of women of childbearing age who do not consume fish." Furthermore, effective messaging should include "the benefits of fish consumption on reducing mortality from coronary heart disease (and the risks of mortality from coronary heart disease associated with not eating fish) for the general adult population."ⁱ

2. The fish-based omega-3s, DHA and EPA, should be included as nutrients of concern.

Along with vitamin A, iodine and iron, deficiency in DHA and EPA fats is a widespread global concern. In addition to the recommendations to include seafood in healthful diets referenced above, the following chart summarizes international omega-3 recommendationsⁱⁱ:

| Country/Region | Organization | Org. Type | Target Population | Recommendation |
|----------------|--|--------------------------------|---|--|
| Global | World Health Organization (WHO) ¹ | Authoritative Body | General adult population | ▪ n-3 PUFAs: 1-2% of energy/day |
| | Food and Agriculture Organization of the United Nations (FAO) ² | Authoritative Body | 0-6 months | ▪ DHA: 0.1-.018%E |
| | | | 6-24 months | ▪ DHA: 10-12 mg/kg bw |
| | | | 2-4 years | ▪ EPA + DHA: 100-150 mg |
| | | | 4-6 years | ▪ EPA + DHA: 150-200 mg |
| | | | 6-10 years | ▪ EPA + DHA: 200-250 mg |
| | | | Pregnant/Lactating Women | ▪ EPA + DHA: 0.3 g/d of which at least should be 0.2 g/d |
| | International Society for the Study of Fatty Acids and Lipids (ISSFAL) | Expert Scientific Organization | General adult population for cardiovascular health ³ | ▪ at least 500 mg/day of EPA+DHA |
| | | | Pregnant/Lactating Women ⁴ | ▪ DHA: 200 mg/day |
| | NATO Workshop on ω -3 and ω -6 Fatty Acids ⁵ | Workshop | General Adult Population | ▪ 300-400 mg EPA+DHA/day |
| | World Association of Perinatal Medicine ⁶ | Working Group | Pregnant and Lactating Women | ▪ 200 mg DHA/ day |
| | | | Infants, when breastfeeding is not possible | ▪ 0.2-0.5% wt total fat |
| | World Gastroenterology Organisation ⁷ | Expert Scientific Organization | General Adult Population | ▪ 3-5 servings/wk of fish |

Very low blood levels of EPA and DHA have been observed in North America, Central and South America, Europe, the Middle East, Southeast Asia, and Africa.ⁱⁱⁱ

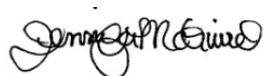
3. Because human nutrition and food systems are distinct disciplines, expertise in both is required to result in a balanced report.

To address specific food systems, even further expertise in those areas would be required. We recommend the following fisheries and aquaculture experts:

- Dr. Ray Hilborn – Fisheries Management, specifically in the U.S. Pacific Northwest
- Dr. Victor Restrepo – Fisheries Management, specifically tuna
- Dr. George Chamberlain – Aquaculture
- Robins McIntosh - Aquaculture, specifically shrimp

We applaud the work of the HLPE committee to address the complex topic of Nutrition and Food Systems and look forward to following the finalization of the report.

Sincerely,



Jennifer McGuire, MS, RD



Rima Kleiner, MS, RD

ⁱ Food and Agriculture Organization of the United Nations and World Health Organization. "Joint FAO/WHO Expert Consultation on the Risks and Benefits of Fish Consumption" September 2011. <<http://www.fao.org/docrep/014/ba0136e/ba0136e00.pdf>>

ⁱⁱ Global Organization for EPA and DHA Omega-3s. "Resources for Healthcare Professionals." 2014. <<http://www.goedomega3.com/healthcare>>

ⁱⁱⁱ Stark, K., et al. "Global survey of the omega-3 fatty acids, docosahexaenoic acid and eicosapentaenoic acid in the blood stream of healthy adults." Progress in Lipid Research. 2016; 63: 132-152.