November 6, 2006
Patricia N. Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Service, USDA
3101 Park Center Drive, Room 528
Alexandria, Virginia 22302.

Re: Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels,

We, the undersigned individuals and organizations, strongly support the U.S. Department of Agriculture's (USDA's) proposed addition of healthier fish choices to the supplemental foods provided under the Women, Infants, and Children (WIC) Program.[1] Specifically, USDA proposes to add canned sardines and salmon to the WIC Program's enhanced food package VII for exclusively breastfeeding women, the only WIC package which includes fish. Canned albacore (white) tuna would be removed from the program. This new provision would align the WIC program more closely with two recent reports from the Institute of Medicine. These reports recommend that pregnant and breastfeeding women regularly consume fish, in large part because of the health benefits from long chain omega-3 fatty acids, but that they avoid fish with high levels of mercury.[2,3]

According to USDA's Food and Nutrition Service, almost all of the exclusively breastfeeding women enrolled in WIC from 1998-2002 received 75% or more of the federal maximum allowance of canned tuna (26 ounces).[4] If albacore tuna comprised this entire allotment, these mothers – and more importantly their babies – would be exposed from albacore tuna alone to 95%-127% of the Environmental Protection Agency's reference dose for methylmercury.[5] This level of mercury exposure could result in serious neurological and developmental harm to infants if continued for an extended period of time.

The two new fish selections in the proposed rule – canned wild salmon (typically pink and sockeye) and sardines – are excellent choices for consumers. They have considerably less mercury, and contain more long chain omega-3 fatty acids than canned tuna.[6,7] They also come from ecologically friendly fisheries.[8]

The third proposed fish option – canned light tuna – is typically skipjack tuna, a species of relatively small, fast-growing tuna with fairly low mercury levels.[9] However, a small proportion of canned light tuna has mercury levels which approach the Food and Drug Administration's (FDA's) action level of one part per million[10], presumably because the tuna comes from larger species such as yellowfin, which have markedly higher mercury levels. We strongly encourage USDA to discuss with FDA potential changes in labeling requirements for canned tuna, so that breastfeeding women and other vulnerable individuals can avoid consuming tuna from species with relatively high mercury levels.

Thank you for your consideration,

ORGANIZATIONS:

Environmental Defense

American Public Health Association

Children's Environmental Health Network

Monterey Bay Aquarium

Physicians for Social Responsibility

Physicians for Social Responsibility, San Francisco-Bay Area Chapter

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[1] U.S. Department of Agriculture. 2006. Special supplemental nutrition program for women, infants and children (WIC): Revisions in the WIC food packages; Proposed Rule. Federal Register Notice 71(151): 44784-44855.
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[6] U.S. Food and Drug Administration, Center for Food Safety and Applied Nutrition. 2006. Mercury levels in commercial fish and shellfish. http://www.cfsan.fda.gov/~frf/sea-mehg.html
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