**PETITION SUMMARY**

Industrially caused poisoning events in the last century revealed that extreme exposure to methylmercury before birth can cause significant neurological harm. Follow-on research into whether eating fish during pregnancy under normal circumstances is likely to subtly harm the fetus often revealed gains in neurodevelopment, rather than harm. Assessments by the U.S. Food and Drug Administration (FDA) and by experts from 11 countries brought together by the Food and Agriculture Organization of the United Nations and the World Health Organization (FAO/WHO) further revealed that: (1) there are optimum amounts of fish that can provide the most gains; while (2) harm from methylmercury requires amounts well beyond optimum.

Based on these findings, FDA informed the U.S. Congress and the public that it was developing new advice designed to obtain the most gains to neurodevelopment that fish could provide while keeping risk of harm from methylmercury low. In terms of IQ, the FDA and FAO/WHO assessments estimate gains in the range of 3-5 IQ points. This range has been correlated with increases in lifetime earnings of 5-12 percent. In the U.S. and many other countries, obtaining these gains would require eating more fish during pregnancy than most women eat.

In January, 2017, FDA and EPA issued fish consumption advice that is not likely to obtain the increases in fish consumption needed to achieve FDA’s stated purpose, with consequences for fish consumption and, therefore, public health. In May, 2017, former senior FDA food officials and scientists along with other scientists and academics from the U.S. and U.K. petitioned FDA to withdraw the advice and replace it with advice designed to maximize gains while minimizing risk. If FDA declines to do so, the petition asks that FDA provide a scientific basis for its most problematic features. A sampling of the petition’s requests follows:

* 2004 advice stated that methylmercury is not a health risk for most people, but the current advice omits this scientifically accurate reassurance. The petition asks that FDA either reinstate it or provide a scientific justification for leaving it out.
* All the research that show gains are to neurodevelopment but the current advice omits this detail. Gains to neurodevelopment, such as to IQ, are important for pregnant women to know if they are to be motivated to eat more fish. The petition asks FDA either to include this information in new advice or provide a scientific basis for omitting it.
* The current advice essentially states that the gains from fish during pregnancy are obtainable from other high-protein foods (which are not named). There is no body of evidence, however, that another food provides similar incremental gains in cognition when eaten during pregnancy. Fish may be unique in this regard. The petition asks FDA to either withdraw this claim or name the foods and provide a scientific basis for it.
* The current advice recommends a weekly amount of fish during pregnancy but does not state that it is an optimum amount to provide the most gains or how significant the gains could be. The advice implies that the recommended amount is an upper safe limit, but the science does not support this implication. The petition asks FDA either to recommend an optimum amount and explain the gains that can be obtained from eating an optimal amount, or explain the scientific basis for omitting this information.