

WESTERN FISHBOAT OWNERS ASSOCIATION©



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Mark B. McClellan, M.D., Ph.D
Commissioner of Food and Drugs
United States Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

Dear Commissioner McClellan:

The Western Fishboat Owners Association (WFOA) represents about 400 commercial albacore tuna fishing vessel owners from California, Oregon, Washington, and Hawaii, as well as Canada and New Zealand. On their behalf we would like to take this opportunity to urgently request that the Food and Drug Administration **immediately implement a program to systematically test the significantly large pool of domestic albacore fishermen for methylmercury, and to also establish a formal study into the actual short- and long-term effects of high-volume albacore tuna consumption by albacore fishing families.**

It should be pointed out that professional albacore fishermen and their families undoubtedly eat more albacore tuna than any other segment of the population. We are quite sure that if the FDA responds to this request, one of the first findings will be that most albacore fishing families consume albacore several times a week throughout the year, and even more during the fishing season, which is a rate far higher than the national average. Many of our members are also second and third generation albacore fishermen who ate large quantities of albacore as young children, and were born to mothers who regularly ate large quantities of albacore tuna during pregnancy and while nursing.

WFOA believes it would be appropriate and very useful for the FDA to continue it's investigations of seafood-related methylmercury consumption and the public health using albacore fishing families as study subjects.

This urgent request has been prompted by our concern over the FDA's new draft advisory regarding albacore tuna methylmercury content and warnings to pregnant women, nursing mothers, and young children. As a direct result of the new draft advisory, hundreds of newspapers and media networks across the nation are now reporting that "...the [scientific advisory] panel told FDA that it could do a better job of spreading word on which fish have too much mercury, particularly that white, or albacore, tuna has nearly three times as much mercury as cheaper 'light' tuna...." In essence, albacore tuna is being singled out and publicly branded as a possible health hazard – albeit in the absence of even a single documented case of actual harm directly resulting from the consumption of albacore. WFOA members are particularly perplexed by these developments since they and their children collectively seem to be very healthy “despite” regularly consuming unusually large quantities of albacore tuna, which is in fact an excellent source of protein and Omega-3 essential fatty acids.

Yet instead of debating the draft advisory or it's impacts on the entire domestic albacore fishing community, at this time we would simply like to step forward as ready-and-willing volunteers for an FDA-administered methylmercury testing program that would help to answer albacore-related questions relevant for more effectively protecting the general public's health. After careful deliberations, our Executive Board concluded that because of the various sensational claims being made by some “consumer interest groups” (i.e., groups that are currently and very openly attacking the seafood and particularly tuna industries), in the current climate only a government study conducted with appropriate checks, balances, and full transparency could properly ensure the objectivity,

integrity and credibility of any methylmercury tests performed on commercial albacore fishing families. However, our association could still provide valuable assistance by alerting our membership of the particulars and otherwise helping to coordinate FDA testing efforts.

The next WFOA annual meeting will take place next March in Reno, Nevada. Because at least 200 commercial albacore fishermen and their family members typically attend our annual meetings, this may be the best opportunity for the FDA to meet with and conduct methylmercury tests on volunteers. This option would also provide three of months to develop an appropriate testing protocol, design questionnaires suitable for collecting lifestyle, health and albacore consumption data, and other preparatory tasks.

The WFOA membership as a whole sincerely hopes to hear back from you regarding this request as soon as possible, and we look forward to working with the FDA in the coming months. Please contact me at (707) 443-1098, email address wfoa@cox.net or through the mailing address on this letterhead so that we can begin discussing project coordination needs and other details.

Respectfully,

WAYNE HEIKKILA
Executive Director, WFOA

cc: Mr. Mike Leavitt, Administrator
Environmental Protection Agency

Bruce Alberts, President
National Academy of Science
Chairman, National Research Council

Dr. Patricia A. Nolan, Director
Rhode Island Department of Health

Dr. Elias A. Zerhouni, Director
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