

WWF UK's response to the FSA's review of its advice on Fish Consumption

WWF-UK welcomes the opportunity to respond to this consultation on the FSA's advice on seafood. WWF has extensive experience and knowledge of the seafood sector, and was instrumental in establishing the MSC scheme, while in January 2009 it launched its One Planet Food programme aimed at reducing the impacts of our eating habits on the environment. We previously responded to the EFRA consultation on securing food supplies up to 2050¹.

WWF-UK supports the second approach to "maintain the Agency's consumption advice, but supplement it with encouragement to make sustainable choices and advice (or direction toward sources of advice) on how to do this." WWF UK feels there would need to be detailed guidance on how to ensure the fish consumed is from sustainable sources, the effects of fishing from unsustainable sources. Sustainability should be placed on an equal position as nutrition and health. This is in concord with the recommendation from the Cabinet Office report "Food Matters"² that the FSA should become a "one-stop shop" for citizens seeking advice about all aspects of food. Nor does it meet the recommendation of the Sustainable Development Commission's report, "Green, Healthy and Fair"³, to align its advice on fish with the evidence on sustainability.

Fisheries and certification

In 2004 the Royal Commission on Environmental Pollution produces its report, "Turning the Tide" ¹ which confirms the precarious state of the marine environment and the life it supports. The report recommends that urgent action is taken to reverse the impoverishment of marine ecosystems and highlights the important role which consumers play in this transition. Equally, urgent reform of domestic and European fisheries management policy is required to deliver this recovery, but also a profitable fishing industry.

WWF believes that the advice given to consumers through FSA guidance can play an important role in assisting this change. The environmental footprint of the current fish production model is not conveyed to the consumer in a meaningful way, this needs to change. In recent years, the Marine Stewardship Council has become a more recognisable and available brand in seafood. This standard, which was co-founded by WWF, assesses fisheries against its environmental standards for sustainable fishing. It is our view that the MSC is the most credible standard available and one which is capable of assisting in the change to a sustainable production model. We therefore propose that the FSA advises that consumers use the brand as the best indicator of sustainable seafood.

Current FSA advice recommends that consumers eat two portions of fish per week and that one of these is oily fish. We would like the FSA to recognise that consumers can meet these targets in a sustainable way particularly if they choose alternative species which are currently under utilised. Pelagic fish such as mackerel and herring are caught in large quantities and are currently exported due to demand in other global markets. As an added benefit, many of these

¹ WWF UK's response to the DEFRA enquiry into securing food supplies up to 2050: The challenges for the UK http://assets.wwf.org.uk/downloads/2050_food_consultation.pdf

² *Food Matters: Towards a Strategy for the 21st Century*. Cabinet Office Strategy Unit, July 2008. http://www.cabinetoffice.gov.uk/media/cabinetoffice/strategy/assets/food/food_matters1.pdf

³ *Green, healthy and fair: A review of government's role in supporting sustainable supermarket food*. Sustainable Development Commission, February 2008. <http://www.sd-commission.org.uk/pages/green-healthy-and-fair.html>

¹ *Turning the Tide: Addressing the Impact of Fisheries on the Marine Environment*. Royal Commission on Environmental Pollution, 2004 <http://www.rcep.org.uk/fishreport.htm>

species are more ecologically resilient because they live lower in the food chain than many other fish species, such as cod. In terms of white-fish, it is these stocks which have seen the most declines and are those which remain threatened by current fishing practices, and which often results in significant levels of bycatch and associated impacts on marine habitats. Our view, that the FSA should therefore advise consumers to choose whitefish from certified fisheries or those where responsible practices are used.

In terms of shellfish, the UK has production of these species, often these contain high levels of fatty-acids and are generally among the most responsibly managed fisheries in the UK.

Aqua Culture

Carnivorous farmed fish require a proportion of fish meal and fish oil in their diet. About 60% of this comes from wild fisheries that are not presently certified as sustainable and the remainder are from sustainable trimmings (the waste products from processing of fish for Human consumption). Salmon use the majority of fish oil produced in the world as well as relatively high quantities of fish meal.

The most sustainable aquaculture fish are home grown vegetarian fish such as carp and tilapia although they are less healthy. Production of these species in the UK is expanding. There is an issue of food miles for aquaculture fish imported mainly from the tropics such as prawns, catfish and tilapia. Tilapia contains small quantities of omega-3 fatty acids – less than half a gram per 100 grams of fish, whereas farmed salmon and trout contain nearly 3 and 4 grams, respectively. Tilapia also has much higher ratios of long-chain omega-6 to long-chain omega-3. The ratio in tilapia averages about 11:1, compared to much less than 1:1 in both salmon and trout.

Organic fish are better than non-organic mainly because of more sustainable sourcing of feeds. As soon as Aquaculture Stewardship Council (ASC) certified fish become available these should be recommended and supported by the FSA.

Nutrition

Fish is a good source of protein, some vitamins and minerals and oily fish is also a rich source of omega 3 essential fats. A recent review of evidence from randomized trials and large prospective studies evaluated the risks and benefits of fish consumption on human health and concluded that the health benefits of a modest intake (1-2 portions of fish per week) exceed the potential risks⁴.

The healthy component of fish is the omega 3 polyunsaturated fatty acids which are derived from algae and marine oils. Only two fatty acids, DHA and EPA, are linked to health in most animals including Humans. WWF-UK recommends the FSA makes it clear that something can be high in omega 3 fatty acids and yet contain no EPA or DHA and therefore carry minimal health benefit from being high in omega 3.

WWF-UK suggests that FSA amends its advice on fish consumption to recommend fish eaters to eat 1-2 portions of fish per week, primarily oily fish. These fish should come from MSC certified sustainable sources and people should be encouraged to move away from the currently preferred cod and haddock (wild stocks are seriously depleted and although these are

⁴ Mozaffarian D, Rimm EB. Fish Intake, Contaminants, and Human Health: Evaluating the Risks and the Benefits. JAMA. 2006 Oct 18;296(15):1885-99

a good source of low-fat protein, they contain little omega-3) and towards a wide variety of less threatened species, including oily fish such as pilchards, sardines and mackerel.

The health benefits of eating vegetarian fish such as carp, tilapia and *Pangasius catfish* have been questioned as they contain much lower quantities of omega 3 and relatively high levels of omega 6 for fish. However, they are still healthier than red meats such as pork, lamb and beef because they at least contain some proportion of omega 3.

Although oily fish is a good source of protein, omega 3 fats and some vitamins and minerals, it is not the only source of these nutrients. For example vegetarians can get omega 3 fats from vegetable sources such as alpha-linolenic acid (ALA) found in flax seed/oil and leafy green vegetables and as long as they are not deficient in zinc, magnesium, vitamin B6 or biotin, they can synthesise the cardio-protective longer chain fatty acids (EPA and DHA) from ALA.

The fish most at risk of being over-exploited – either already or in the near future – are mainly white fish. There are no known disease risk reduction benefits from eating white fish and though it is a low fat source of protein no-one in the UK is at risk of eating inadequate amounts of protein and the FSA's website acknowledges that the majority of the population eats more protein than they need and there are other more plentiful low fat sources of protein, such as beans and pulses. Unlike white fish, these latter have the additional benefit of being high in fibre which, unlike protein, is in short supply in the average UK diet.

As shellfish, such as crab, langoustine and mussels, are low in fat, while being rich in minerals and protein and a range of vitamins and can be sourced sustainably, there should be formal advice on the consumption of shellfish from the FSA.

UK Food System

WWF-UK is striving for a One Planet Future and has recently launched a One Planet Food Programme aimed at reducing the adverse impacts of UK food consumption. Mr David Miliband, when responsible for DEFRA, adopted the 'One Planet' concept in 2006 as a lodestar for guiding the development of UK food and agriculture policy. Due to a range of Government efforts, such as the recent work of the Cabinet Office on food policy⁵, and Defra research such as the Cranfield study of resource use and environmental burdens from production on a life-cycle basis⁶, the UK is now a leading participant in international debate about the role of the food economy in natural resource protection, conservation, and social justice. This is an area the FSA should be engaging on and guiding people towards sustainable diets that bring health, social and environmental benefits. the FSA's own policy on sustainable development which acknowledges that "the different pillars of sustainability are interconnect". Moreover, the Agency acknowledges that these pillars are environmental, social and economic, and that it will aim to ensure that the interests of consumers in relation to food are protected "while maximising positive impacts in all areas of sustainable development". FSA's official policy on sustainable development is that it will choose the most sustainable policy option and only in exceptional circumstances will it not do so, with every effort being made to minimise the resulting negative impacts.

If everyone in the world lived as we do in the UK, we would need three planets to support us. WWF works for a world where everyone thrives within their fair share of the Earth's resources, while leaving space for wilderness and wildlife. Ours is a vision for humanity as much as for the

⁵ Cabinet Office (2008) Food Matters: Towards a Strategy for the 21st Century

⁶ Williams, A., Audsley, E. and Sandars D. (2006). Determining the environmental burdens and resource use in the production of agricultural and horticultural commodities. Defra project report IS0205

environment that surrounds us. It is a vision that requires a transformation in the way we live – a vision for a One Planet Future⁷. Food, its production and consumption, is part of that vision and as such WWF-UK has set several targets around UK fish Consumption. These include Government policies are identified that support sustainable sourcing of key commodities including fish, the consumption of MSC fish has increased by a minimum of 10% by 2012, something that could be accelerated with the FSA highlighting sustainability in fish consumption and that 10% of UK feed fisheries are MSC Certified.

The 2004 report, “Turning the Tide”⁸ confirms the precarious state of the marine environment and the life it supports. It recommends, among other things that the FSA urgently explore alternatives to advising increased oily fish consumption since, if this advice was followed, it would further damage the already fragile marine environment.

The way in which consumers choose and consume food products is a critical factor in determining environmental impacts. Where they shop, how they get there, what they buy, how they cook it, and what they waste is the result of a complex mixture of beliefs, motivations, habits and norms. It is, therefore, essential the FSA emphasises sustainability when giving advice, not just on seafood but in connection with all food.

The FSA should be a single source of integrated advice on seafood, as is recommended by the cabinet office and the Sustainable Development Commission. This is what people would like as they see the FSA as an agency to go to for comprehensive advice on food and food issues. As such WWF UK feel the FSA should choose option 2 and it must ensure that it goes beyond encouraging sustainable choices and ensures that sustainability is equal to nutrition and health advice.

⁷ <http://www.wwf.org.uk/filelibrary/pdf/oneplanetfuture.pdf>

⁸ *Turning the Tide: Addressing the Impact of Fisheries on the Marine Environment*. Royal Commission on Environmental Pollution, 2004 <http://www.rcep.org.uk/fishreport.htm>