



Brussels, 13 March 2009

EEB and ZMWGⁱ comments concerning labelling of foodstuff containing mercury in relation to the Environment Committee's report on the EC proposed regulation on the provision of food information to consumers
[Discussion of amendments in ENVI, 16 March 2009 – Sommer report]

The European Environmental Bureau's 'Zero Mercury Campaign' and the Zero Mercury Working Group welcomed the Commission's proposal on an EU regulation on the provision of food information to consumers.

Working on mercury policies during the past five years, we especially **welcome the submission of amendment 677 (and 673)** concerning labelling of *meat of large predatory fish or foodstuffs containing meat from these fish species*, in relation to their **mercury content**, by: *'contains methylmercury- not recommended for pregnant or breastfeeding women, women who might become pregnant, and children'* to be added immediately after the list of ingredients. In absence of a list of ingredients, the statement shall accompany the name of the food.

Mercury is highly toxic, causing damage to the nervous system at even relatively low levels of exposure.ⁱⁱ Microbial metabolism of deposited mercury can create methylmercury, its most toxic form, which has the capacity to collect in human and animal bodies (bioaccumulate) and to concentrate up food chains (biomagnify), especially in certain types of fish. Methylmercury is a well documented neurotoxicant, which may in particular cause adverse effects on the developing brain. It readily passes both the placental and the blood-brain barrier, therefore, exposures during pregnancy are of highest concern. The Commission's Directorate-General for Health and Consumer Protection has recommended that women who are breastfeeding or who are or might become pregnant should limit their consumption of large predatory fish, such as swordfish, shark, marlin, pike and tunaⁱⁱⁱ.

It is well-known that mercury travels throughout the atmosphere, contaminating European and global food supplies at levels which seriously threaten human health, wildlife and the environment.

We therefore urge you to support amendments 673 and 677 for the following reasons:

Multiple studies demonstrate a co-relation between fish intake and mercury exposure, although it depends on the amount and species of fish. Exposure to mercury is linked to central nervous system, kidney and liver damage, defects in foetuses and learning deficits. Mercury is also linked to impairment of cardiovascular, immune and reproductive systems.

- The Zero Mercury Working Group has recently (February 2009) released a study "*Mercury in fish, a global health hazard*", where fish were tested for their mercury content in, among other, six countries in Europe. For the EU two clear concerns emerge from the report – adults and children who eat greater-than-average amounts of fish may get excessive methylmercury exposure even if the average mercury level in their fish is relatively modest, and people who prefer to eat predatory, mercury accumulating species can easily be exposed to excessive methylmercury doses if they eat those fish often.^{iv}

- The study by Grandjean et al.^v, on fish consumption and child development in the Faroe Islands, showed that the children of the mothers who regularly consumed pilot whale meat had neurological deficits such as cognitive delays, impaired motor and language development and irregular cardiovascular development.
- A US study^{vi} estimates that between 300,000-600,000 babies born each year suffer from intelligence loss due to methylmercury exposure, which costs an estimated 8.7 billion dollars a year in lost earnings to the economy. The US EPA also acknowledges that several instances of methylmercury poisoning through consumption of contaminated fish have occurred, resulting in impairment of vision, motor in-coordination and neurological impairment.^{vii}

Several Member States and other countries, such as U.S., Australia and New Zealand, have already issued specific advice to vulnerable groups to limit their intake or abstain from the intake of certain species of fish with regard to methylmercury intake.

Finally this proposed amendment is in line to the EU Strategy on mercury (January 2005), which is supported by the European Parliament (March 2006)^{viii}, with the key aim to reduce mercury levels in the environment and human exposure, especially from methylmercury in fish.^{ix}

To conclude – providing safety information to fish consumers regarding methylmercury intake should be a priority for European health policy. Unnecessary impairment to health for vulnerable groups can then be avoided. Targeted consumer safety labelling is an appropriate approach in this case in order to protect vulnerable populations.

Thank you in advance for considering our recommendations during your discussion on the amendments at the Environment Committee meeting on the 16th March 2009.

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ⁱ Environmental and Health NGOS include

The European Environmental Bureau, (EEB), www.eeb.org, is a federation of more than 145 environmental citizens' organisations based in all EU Member States and most Accession Countries, as well as in a few neighbouring countries. These organisations range from local and national, to European and international. The aim of the EEB is to protect and improve the environment of Europe and to enable the citizens of Europe to play their part in achieving that goal.

The Zero Mercury Working group, www.zeromercury.org, is an international coalition of more than 75 public interest non-governmental organizations from around the world formed in 2005 by the European Environmental Bureau and the Mercury Policy Project/Ban Mercury Working Group. The aim of the group is to reach 'Zero' emissions, demand and supply of mercury, from all sources we can control, towards eliminating mercury in the environment at EU level and globally."

ⁱⁱ World Health Organization (WHO), 1991, Environmental Health Criteria 118, Inorganic Mercury, WHO, Geneva.

ⁱⁱⁱ EFSA communication on methylmercury in fish, 2004,

http://www.efsa.europa.eu/cs/BlobServer/DocumentSet/note_methylmercury_af09_doc0602_en1.pdf?ssbinary=true

^{iv} http://www.zeromercury.org/International_developments/FULL_FISH_REPORT_FINAL+.pdf

^v Grandjean, P., Weihe, P., White, R., Debes, F., Araki, S., Yokoyama, K., Murata, K., Sorenson, N., Dahl, R., Jorgenson, P., November 1997 'Cognitive deficits in 7-year-old children with prenatal exposure to methylmercury' Neurotoxicology and teratology. vol. 19, issue, 6, pp. 417-428.

^{vi} Mount Sinai study: Public health and economic consequences of Methyl Mercury Toxicity to the Developing Brain, February 28, 2005 <http://ehp.niehs.nih.gov/members/2005/7743/7743.pdf>

^{vii} US EPA <http://www.epa.gov/waterscience/fish/advice/mercupd.pdf>

^{viii} <http://www.europarl.europa.eu/sides/getDoc.do?language=EN&pubRef=-//EP//TEXT+TA+P6-TA-2006-0078+0+DOC+XML+V0//EN>

^{ix} EU Strategy on mercury, <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52005DC0020:EN:NOT>