

Response to the FSA's review of its advice on fish consumption

I work independently on the agri-food area supporting research strategy development, research management, and evidence based policy making. My work over the last two years has included analysis of the relationship between the UK food economy and the environment, including the environment as affected by the fish sector. This has focused particularly on the North-east Atlantic which is the major source of UK consumed seafood.

The Agency's consideration of plans to augment nutritional advice with information relevant to sustainable consumption is to be welcomed. From the viewpoint of environmental impacts of the food economy, fish consumption is an 'impact hotspot'. UK impacts are particularly high due to preferences for white fish species native to the North-east Atlantic, and the consumption of piscivorous farmed fish (e.g. salmon). Implicit in the consultation is acknowledgement that the FSA should consider the environmental implications of advice to consumers and facilitate consumption choices that reduce adverse impacts.

According to the FAO, UK fish consumption equates to 23 kg of commodity fish per capita per year. This compares with an average of 16 kg for the world. There is now clear evidence that this level of global fish consumption is unsustainable. With current fish production technologies and supply chains, it is simply an irreducible fact that the current level of UK fish consumption is unsustainable in a global sense. The advice to increase consumption adds further to this and can only be sustained as long as consumption in other countries remains very low. Shifting consumption towards sustainable seafood is a step in the right direction but it alone does not address the overall condition of global fish resources.

The approaches offered by the FSA ignore this reality – the two choices offered are inadequate. They amount to (unsustainable) business as usual (ie increased consumption), or the same business as usual with some information that might affect consumption with respect the current production options, ie a shift towards more sustainable sourcing.

There seems to be a reluctance to examine the current dietary advice in the light of current sustainable development challenges with causal links in mind. The current advice seems to reflect the mindset of the post World War II era (protein consumption) and the concerns of the 1970 – 2000 period around saturated fats. It seems to be a classic public health approach that bundles direct and indirect effects to give a public health benefit. It is not determined by causal links. As a result it combines benefits associated with what fish bring to the diet (beneficial fatty acids) with benefits arising from what fish displace in typical diets (saturated fat). The result is we may have a policy to encourage consumption beyond that required to sustain the causal link between the benefits fish (essential fatty acids) and the benefits associated the displacement effect of fish consumption. The latter in particular seems to be the driver behind the recommendation on white fish consumption – precisely the consumption that is doing most damage to our most vulnerable sea fisheries.

Dr Donal Murphy-Bokern

27 March 2009

Postscript: This evidence was neither published by the FSA nor used in the subsequent revision of its guidelines on fish consumption.