

November 14, 2006

Senate Subcommittee on Agriculture Appropriations
1444 Dirksen S.O.B
Washington, DC 20004

RE: Insufficient Inspection of Seafood Imports

Dear Senator:

The undersigned organizations respectfully request the Senate Appropriations Subcommittee on Agriculture to reconsider the current status of imported seafood inspections during the 2006 Congressional “lame duck” session. We believe strongly that renewed attention must be paid to the current inspection program of the Food and Drug Administration in order to safeguard the health of Americans, who are currently consuming more seafood than ever before. Eighty percent of the seafood consumed by Americans now originates in foreign countries, yet the Food and Drug Administration is in dire need of additional funding to carry out increased inspections of imported seafood. We urge you to consider supplementary funding for this critical FDA program.

The National Academy of Sciences Institute of Medicine’s new report, “Seafood Choices: Balancing Benefits and Risks,” highlights the benefits of seafood consumption, citing it as a source of high quality lean protein and beneficial omega-3 fatty acids. Although this scientific report does not specifically discuss FDA seafood inspections, it calls attention to the surge in seafood imports and the antibiotics and chemotherapeutants use in aquaculture.

According to a January 30, 2004 Government Accountability Office report entitled “FDA’s Imported Seafood Safety Programs Shows Some Progress, but Further Improvements Are Needed,” only 1.2 percent of imported seafood shipments are tested at ports of entry. While the report shows that the FDA increased testing from less than 1.0 percent in fiscal year 1999, these low inspection rates remain inadequate and the public should not be encouraged to consume increased amounts of seafood until the rate of inspection is increased.

Even more troubling, the GAO report notes that in its review of import inspections, port-of-entry personnel were not notified by the FDA for an average of 348 days upon identification of serious health and safety problems at six foreign firms. We are concerned that such delays in notification when combined with an insufficient federal inspection program places the public at great risk of consuming contaminated seafood products. This risk is unjustifiable when increased funding for more comprehensive inspections and programmatic improvements could ensure safer seafood products and a higher standard for consumer health.

Consumers need protection from unsafe drugs and chemicals used in fish farming in other countries. We recommend that the FDA improve testing of seafood products,

implement new regulatory programs, tighten its standards, provide incentives for producers to reduce drug and chemical use, and give consumers enough information to make informed decisions. The U.S., Japan and the European Union are the top three importers of seafood worldwide. Both Japan and the EU have more stringent seafood import inspection programs compared to the U.S. We recommend that the FDA analyze those programs in order to develop a program that increases inspection rates and further protects American consumers from harmful drugs.

As the Senate prepares to finalize its version of H. R. 5384, legislation concluding appropriations for Agriculture, Rural Development, Food and Drug Administration and Related Agencies for fiscal year 2007, we encourage you to support increased funding for the FDA's imported seafood inspection program.

Sincerely,

Center for Food Safety - Washington, DC

Center for Science in the Public Interest - Washington, DC

Clean Catch - Gloucester, MA

Downeast Lobstermen's Association - Deer Isle, Maine

Food & Water Watch - Washington, DC

Georgia Shrimp Association - Georgia

Greenpeace - Washington, DC

Louisiana Shrimp Association, Louisiana

Louisianan Shrimp Industry Coalition - Louisiana

Mangrove Action Project - Port Angeles, WA

National Environmental Trust - Washington, DC

PISCES (Professional Involvement in Seafood Concerned Enterprises) - Gulf of Mexico

Southeastern Fisheries Association - Tallahassee, FL

Texas Shrimp Association - Texas

United Commercial Fisherman's Association - Louisiana