

RESPONSE TO PUBLIC CONSULTATION

EUROPEAN FOOD SAFETY AUTHORITY

**Draft Scientific Opinion:
Dietary Reference Values for Fat**

We, the undersigned 22 scientific researchers and clinicians, specialising in omega-3 fatty acids, urge EFSA to withdraw and reconsider the section on "n-3 polyunsaturated fatty acids" (Para 6.4.2) in its entirety. The current text suffers from fundamental problems:

1. It includes, without qualification, the statement that "The human body can synthesize EPA and DHA from alpha-linolenic acid". In fact, the conversion rate is so low, especially for DHA, that consumers would receive little or none of the health benefits associated with DHA. There is much recent research on this point, summarised in the official position on conversion, published in 2008, by the International Society for the Study of Fatty Acids and Lipids (ISSFAL).
2. The AI of 250mg/d for combined EPA plus DHA is too low. Over the past 20 years, there have been 15 recommendations on EPA/DHA intakes by specialist organisations and committees. The average of these recommendations is 566mg/d. EFSA should reconsider its AI in the light of the much higher recommendations set by scientists who specialise in this field.
3. There is no mention of mental health in this section at all. In fact, there is a great deal of research documenting the benefits of LC n-3 PUFA on mental well-being throughout the life cycle, from foetal brain development to the amelioration of Alzheimer's disease.

The most recent major research review relevant to mental well being was published by the Food & Drug Administration earlier this year, "Summary of published research on the beneficial effects of fish consumption and omega-3 fatty acids for certain neurodevelopmental and cardiovascular endpoints".

EFSA should consider this large body of research evidence fully and carefully, then make recommendations appropriate for mental as well as physical health.

In addition, earlier in section 6.4, the report declines to make any recommendation on the n-3/n-6 ratio. Yet, it is increasingly recognised that these fatty acids are physiological competitors. Therefore, the large and rising preponderance of n-6 fats in western diets is having a detrimental effect. EFSA should reconsider this question.

These are all basic scientific points. Therefore, EFSA should reconsider its conclusions and advice on omega-3 fatty acids afresh, right from the beginning.

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