



Ingunn Midttun Systad
Acting Director
Norwegian Food Safety Authority
Ullevålsveien 76
0454 Oslo

22 March 2006

Dear Ms. Systad,

In a *Dagsavisen* opinion piece on 21 February 2006, you publicly addressed claims that the Norwegian Food Safety Authority (Mattilsynet) is hiding behind the new EU maximum levels (MLs) for dioxins and dioxin-like PCBs for fish, specifically for Norwegian farmed salmon. Responding to claims by Per Kleppe (*Dagsavisen*, 8 February 2006) and Stig Larssaether (*Dagbladet*, 26 January 2006) that the Norwegian Food Safety Authority should adopt more stringent limits on contamination in seafood, you explained that:

“To get a dispensation from the regulations in the European Economic Agreement (EEA), the Norwegian Food Safety Authority must be able to document a greater health risk to the Norwegian consumer from the intake of farmed salmon, than to the consumers of farmed salmon in other EU/EEA counties. Because of this, the Norwegian Food Safety Authority doesn’t have the legal right to set different standards for the farmed salmon industry than the EU’s.”

Yet, in comments solicited by your Authority, the Norwegian Scientific Committee for Food Safety (VKM) documented the disproportionate health risks to Norwegians. In fact, the VKM in 2004 reported that, "estimates of intake have clearly indicated that fish is one of the food groups that contribute most to the overall exposure to dioxins and dioxin-like PCBs among Norwegians. For the Norwegian population it is therefore important that levels of dioxin and dioxin-like PCBs are kept as low as possible in fish species that are commonly eaten."¹

The VKM further warned that “if the proposed [maximum levels] are made applicable, the mean exposure to dioxin-like PCBs may increase among the Norwegians.” These proposed maximum levels are the levels that Norway adopted this February 2006.

To address this problem the VKM suggested that defining a lower maximum level for farmed fish and lean fish, as well as excluding unrefined fish oil for use in food

¹ “Comments on proposed maximum levels for dioxin-like PCBs in food.” Panel on Contaminants, Norwegian Scientific Committee for Food Safety. Adopted 25 November 2004.

supplements, "would be prudent from a public health point of view and would more adequately protect the population from unnecessary exposure to dioxin-like PCBs."

Despite the VKM's opinion, the Norwegian Food Safety Authority claims that Norwegian salmon is "safe" even after adopting the new EU limits.

In your *Dagsavisen* opinion piece, you attempt to clarify that the Authority's claims are not based on the contamination that the new standard will allow, but "based on the actual content of toxins" found in Norwegian salmon. Yet, once again, information provided from within the Norwegian food safety regime challenges this claim. Sampling data provided on the National Institute of Nutrition and Seafood Research website indicates that Norwegian farmed salmon tested in 2005 contained between 0.84 pg/g and 2.82 pg/g of dioxins and dioxin-like PCBs.² Calculations using this data suggest that just one 200-gram serving of Norwegian farmed salmon could cause a 60 kilogram person to consume more than double the World Health Organization's recommended daily intake for dioxins and dioxin-like PCBs³. And, consuming just one serving of Norwegian farmed salmon would mean you've already consumed two-thirds of your total weekly dioxin intake recommended by the EU.⁴

Scientific studies have demonstrated that farmed salmon acquire most dioxins and dioxin-like PCBs from the fish feed they are fed. Senior scientist, Age Oterhals of the Norwegian Institute of Fisheries and Aquaculture Research (Fiskeriforskning) has confirmed that "dioxins and dioxin-like PCBs in fish derive predominantly from their diet and fishmeal and fish oil are the most important source of contaminants in farmed fish feed."⁵

We understand that the technology to remove these contaminants from fish feed is available and relatively inexpensive. Kjell Bjordal, COO of Cermaq-owned feed company EWOS group, has explained that dioxins and PCBs can be removed from feed for just 20 øre per kilo.⁶ Furthermore, the Norwegian Institute of Fisheries and Aquaculture Research (Fiskeriforskning) stated that "according to tests conducted by Fiskeriforskning, it is possible to remove virtually 100% of the Persistent organic pollutants (POPs) in fish oil and fishmeal. In July, Fiskeriforskning installed a new decontamination plant, and can thus help the industry with the foremost in technology to remove POPs from marine and vegetable raw materials."⁷

In light of this knowledge, the Pure Salmon Campaign asks the Norwegian Food Safety Authority to take action to establish rigorous standards to eliminate dioxins and dioxin-

² Data provided on the NIFES website: http://www.nifes.no/index.php?page_id=167

³ This calculation is based on data provided by NIFES. The World Health Organization's recommendation for daily intake of dioxins and dioxin-like PCBs is between 1 and 4 pg/kg bw.

⁴ The EU's recommend weekly intake for dioxins and dioxin-like PCBs in 14 pg/kg bw

⁵ *UIC News*. www.uic-gmbh.de/eng/pfd_global/uic_news/UICNews15-e.pdf

⁶ <http://www.bellona.no/no/forvaltning/primaernaring/fiskeri/41773.html>

⁷ Fiskeriforskning website:

http://en.fiskforsk.norut.no/fiskeriforskning/nyheter/nyhetsarkiv/milj_gifter_kan_fjernes

like PCBs in Norwegian farmed salmon. We believe that the Norwegian farmed salmon industry and fish feed industry should be made to incur this relatively minor cost, in order to ensure the safety of Norwegian consumers and consumers worldwide.

Consumers do learn. Less contaminated Chilean farmed salmon, for example, is now making inroads into Europe. Whatever brand image advantage Norway now enjoys today may well disappear tomorrow unless the guardians of Norwegian food safety ensure that Norwegian farmed salmon is truly “safe.”

Sincerely,

Andrea Kavanagh
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CC:

- Mr. Kjell Bjordal, COO, EWOS Group
- Mr. Wout Dekker, CEO, Nutreco
- Frank van Ooijen, Director Corporate Communications & Corporate Social Responsibility Officer, Nutreco
- Ms. Marit Husa, Corporate Communication, Nutreco
- Minister Odd Eriksen, Ministry of Trade and Industry, Norway