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Governor Sean Parnell  
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September 23, 2010

Margaret A. Hamburg, M.D.  
Commissioner  
Food and Drug Administration  
10903 New Hampshire Avenue  
Silver Spring, MD 20993-0002

Dear Commissioner Hamburg,

The State of Alaska wishes to express its strong concern regarding AquaBounty's application to market genetically engineered Atlantic salmon. Due to the significant potential threats genetically engineered salmon pose to the environment, consumer health, and the wild seafood industry, we urge you to withhold approval of this application. Furthermore, we question whether the application has received sufficient scientific and public scrutiny, and are troubled by the lack of transparency that has marked the review process.

Like many, we fear genetically engineered salmon could jeopardize the health of wild salmon stocks if released into the wild. Genetically engineered salmon could spread disease, cross-breed with wild salmon, and out-compete them for food and mates. The U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration (NOAA), in a joint letter to the FDA in 2001, and the National Academy of Sciences in a 2002 study, have recognized these concerns and warned the Food and Drug Administration (FDA) about the potential dangers associated with escaped genetically engineered fish.

While AquaBounty proposes containment measures to reduce the chance of genetically engineered salmon escapes, these measures would not eliminate the risk. That risk would grow if AquaBounty supplies genetically engineered salmon eggs to a network of commercial farms, as the company intends. Alaskans are well aware that fish farming containment measures are not fail-safe. Commercial fishermen in Alaska have caught hundreds of Atlantic salmon, escaped from fish farms in Canada and the state of Washington.

We urge you to honor a provision introduced by the late Senator Ted Stevens and Senator Lisa Murkowski, which became law as part of the Food and Drug Administration Amendments Act of 2007 (P.L. 110-85). The provision requires the FDA Commissioner "to consult with the Assistant Administrator of the National Marine Fisheries Service of the National Oceanic and Atmospheric Administration to produce a report on any environmental risks associated with genetically engineered seafood products, including the impact on wild fish stocks." This statutory language was intended to ensure NOAA played a role in the FDA's approval process for genetically engineered seafood products. To our knowledge, no such report has been produced for AquaBounty's genetically engineered salmon.

Before genetically engineered salmon are allowed into the U.S. food supply, more rigorous scientific research is necessary to ensure its long-term consumption is safe for a large cross-section of the population, including sensitive populations such as young children and expectant mothers. As you know, salmon is widely recognized for its health benefits, and many consumers purchase salmon for this reason. Allowing a company to sell a genetically engineered product that has not been the subject of sufficient long-term testing would undermine consumer confidence in all salmon products, as well as the health benefits of salmon consumption.


Genetically engineered salmon could also erode the strength of the wild seafood industry, especially if appropriate labeling is not mandated. For Alaska, the results could be devastating. Alaska's salmon industry is critically important to the state's economy, and is the primary source of employment and revenue in many of our coastal villages. Farmed salmon has already threatened the position of Alaska's wild salmon in the seafood market. Alaska salmon, however, regained its status thanks to significant investments in infrastructure, product quality, and marketing. Marketers focused on distinguishing the health benefits and taste properties of Alaska salmon. Studies still show, however, that consumers struggle to distinguish seafood in the marketplace. Adding genetically engineered salmon to the store shelf could further complicate the efforts of consumers seeking healthy, wild seafood products.

The State of Alaska is also disturbed by the process employed by FDA to review AquaBounty's application. The environmental and public health implications associated with genetically engineered salmon and the significance of approving the first genetically modified animal for consumption in the U.S. warrant the highest level of public participation and transparency. The studies and data submitted to the FDA for consideration of AquaBounty's product were not made available to the public for review and comment until very recently, leaving consumers in the dark about the effects of genetically engineered salmon. We urge you to conduct a more public and transparent process.

Concurrent with the decision on approval of AquaBounty's application, we understand that the FDA is also considering the issue of product labeling for genetically engineered fish. The State of Alaska does not support approval of genetically engineered salmon for sale. If, despite significant environmental and human health concerns, the FDA approves such an application, it should also require that genetically engineered salmon sold in the United States be clearly labeled "genetically modified," so consumers can make an informed choice. This label should be prominently displayed on the front of the package in a contrasting color, and a minimum print size should be required. Alaska statutes require the conspicuous labeling of such products sold in the state.

I appreciate your consideration of Alaska's position on this important issue.

Sincerely,



Sean Parnell  
Governor

Commissioner Hamburg  
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cc: The Honorable Lisa Murkowski, United States Senate  
The Honorable Mark Begich, United States Senate  
The Honorable Don Young, United States House of Representatives  
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Aleta Sindelar, Center for Veterinary Medicine (HFV-3), Food and Drug Administration