



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400 phone
(907) 586-4473 fax

February 3, 2011

Representative Steve Thompson, Chairman
House Fisheries Committee
Alaska State Legislature
Juneau, AK 99811

RE: HJR 8 Opposing Genetically Engineered Salmon

Dear Representative Thompson and Committee Members:

The Alaska Trollers Association (ATA) strongly supports HJR 8, which encourages Congress to ban the sale of genetically engineered (GE) salmon in the United States; comply with consultation requirements, as defined in the Food and Drug Administration Amendments Act of 2007 (FDA); and, requires labeling should the nation allow the sale of GE salmon.

ATA represents hook and line commercial salmon fishermen. Our members take quite seriously the job of delivering a wholesome, high quality product to market and are firmly committed to sound science underpinning the decisions made regarding the food people eat. ATA is also concerned about the health of fishing communities, most of which have already suffered the negative impacts of seafood markets glutted with farmed fish.

ATA strongly opposes the genetic engineering of seafood and has called on FDA to deny approval of these engineered animals. To date, FDA has failed to conduct the appropriate studies to prove the claim that this product, and how it will be raised, will ultimately be safe for human health and the environment. Despite that fact, FDA has signaled that the product may be approved. Therefore we are also compelled to say that our members strongly support mandatory labeling to distinguish GE salmon if it ever should reach the marketplace. We are proud that Alaska has already taken action to support labeling for such products and we support strengthening and enforcing the existing law.

Fishermen are particularly alarmed by the cavalier approach the nation has taken on the issue of genetically engineered foodstuffs. FDA is treating the approval of genetically engineered salmon as if it were a drug. This has shrouded the process in secrecy, in part to protect the patent rights of the developers. The failure of our country to vision a transparent approval process and strict regulatory program for genetically engineered animals/foods is shameful and potentially harmful.

It is already well documented that when it comes to safe food production and GE, the jury is out amongst the scientific community. FDA's own veterinary advisory committee suggested that the science presented was incomplete, particularly if these fish will be raised outside of the two test farms studied and under full scale production scenarios. We can be certain this is the goal.

While FDA and industry backgrounders try to calm the public by explaining that these fish will be just like any other Atlantic salmon, that's simply not true. Once you allow an organism to be modified, it becomes different and the level of risk changes, period. FDA's own scientists pointed that out during the 1990s debate on FDA's policy on GE plants. GE salmon could pose enhanced allergy risks to consumers. This issue lacks robust study and is not well-understood by the consuming public.

Those of us in the seafood industry know far too well that there exists a great deal of confusion when it comes to the seafood market. Engineered salmon certainly aren't like any other salmon, yet the public could easily become confused about which fish are modified and which are not, and opt out of salmon altogether if they fear they are not safe. Our industry could bear a direct cost if this happens.

It appears that FDA and the nation are more than willing to place the burden of proving or disproving food safety on either a multi-national industry that stands to gain financially from GE salmon; or the smaller seafood industry that stands to lose by being overwhelmed by increased farmed production or consumer fears about salmon; or, perhaps even the public themselves if problems arise.

While FDA might not currently believe that GE salmon is markedly different, we have to wonder what other countries think, and why, since so many of them have strongly disagreed with the US on this and other policy questions swirling around GE foods. While current trade agreements and the tendency to lean towards agency discretion may be forcing the hand of the courts and nations, there is obviously no consensus amongst scientists on the matter of GE food and policy. In the court of public appeal, we suggest most people do believe GE salmon is different, and most aren't certain it's safe, therefore, if approved, it should be labeled.

Labeling of GE foods boils down to one of the most fundamental of human needs and rights –access to wholesome foods and information about how they are produced. While the GE salmon may ultimately prove safe, there is no doubt that it is unlike any other salmon available today. It is a processed food at its most basic level, and should be labeled accordingly, particularly when no independent science exists to prove that it is safe. Such a label is not misleading, nor is it in any way false, it is simply telling the consumer the truth about a type of food that until just a few years ago was inconceivable. People should have the right to choose.

Furthermore, there are many reasons beyond food safety that people may choose to avoid GE foods. Social, cultural, religious, and other factors all have a role in food selection. Respect for those choices can also be accomplished through labeling.

While the use of genetic engineering may be appropriate and beneficial for a variety of purposes, such as medical advancement, it does not appear that the science exists to underpin decisions with regard to what, if any, genetically engineered foods belong in the food chain and environment. We hope you will agree, and vote to support HJR8.

Thank you for considering ATA's point of view. Please let me know if I can answer questions on ATA's position or otherwise be of assistance as you work through this matter.

Best regards,

A handwritten signature in dark ink, reading "Dale Kelley". The signature is written in a cursive, flowing style.

Dale Kelley
Executive Director