



3 February 2016

House Special Committee on Fisheries
Hon. Louise Stutes, Chair
Alaska State Legislature

Testimony of AquaBounty Technologies on House Joint Resolution 28: An Act Prohibiting the Sale of a Genetically Modified Fish or Fish Product

AquaBounty understands and shares the concerns Alaskans have for their fisheries, and over the last five years, we have attempted to communicate detailed information regarding our AquAdvantage Salmon to Alaskans and their representatives. At this time, we feel it is important to address certain inaccuracies that are contained within House Joint Resolution 28, so that the record can be clear and accurate on these points. We firmly believe that AquAdvantage Salmon does not threaten the existence of the Alaskan salmon fisheries or their markets and we wish to enter into the record our reasons for making this statement.

1. AquAdvantage Salmon are all-female and sterile, meaning they cannot mate with themselves or with other Atlantic salmon.
2. AquAdvantage Salmon are Atlantic salmon and the scientific literature is clear that Atlantic salmon cannot mate with Pacific salmon and produce viable eggs, as they are a different species of fish.
3. The scientific literature is also clear that transgenic salmon are poor competitors and would probably not survive if released into the wild. The transgene would likely disappear from the population in a single generation.
4. AquAdvantage Salmon are required, under the conditions of use for its FDA approval, to be farmed only in land-based, contained aquaculture systems.
5. Our approved grow-out facility is located in the highlands of Panama, where the risk of escape is zero due to the multiple, redundant physical barriers employed to ensure containment of the fish. Panamanian and FDA regulatory inspectors visit this site frequently to assess the integrity of the facility and our standard operating procedures.
6. In over 25 years of research and culturing of AquAdvantage Salmon, there has never been an escape from our facilities in Canada or Panama.
7. As stated in the FDA review documents and the FDA approval announcement, AquAdvantage Salmon represents a very small risk to the environment of the United States when farmed in land-based systems.

There will be no impact to the commercial, sport and subsistence fishing industries from the farming of AquAdvantage Salmon.

Similarly, the inference that there may be negative health effects from the consumption of AquAdvantage Salmon is inconsistent with the record. A detailed review of food safety studies by the FDA found that AquAdvantage Salmon is an Atlantic salmon and is as safe to consume as other farmed Atlantic salmon. It is in fact arguable that there is more food safety data on AquAdvantage Salmon than on any other type of salmon presently offered for sale to consumers.

In announcing the approval of AquAdvantage Salmon, the FDA stated that, “After an exhaustive and rigorous scientific review, FDA has arrived at the decision that AquAdvantage Salmon is as safe to eat as any non-genetically engineered (GE) Atlantic salmon, and also as nutritious.”

Reference: <http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm472487.htm>

Regarding the statement that two million public comments were filed for the record with the FDA, “According to the Dockets Branch, the FDA Docket [FDA-N-2011-0899] logged a total of approximately 38,000 comments as of the close of the comment period. Most of these comments were form letters (what Dockets logged as a single comment under one submission may have contained multiple copies of the same form letter).”

“Wild Alaskan” salmon is well known due to well-funded marketing campaigns that have focused on differentiating Pacific salmon originating in Alaska waters from farmed Atlantic salmon in the minds of consumers. However, experts in nutrition have encouraged consumers to eat both wild and farmed salmon, because both are considered beneficial for human health. AquAdvantage Salmon is equally beneficial to human health. AquaBounty does not oppose Alaskan wild salmon and does not threaten its existence or commercial market with our AquAdvantage Salmon. Alaskan salmon is sold to and consumed by a distinct and differentiated market segment.

AquaBounty does not argue the right of Alaskans to choose what products are produced or sold in their state. In our experience governments do not ban products consumers do not want, they ban products that consumers want, but that they do not want them to have. Representing AquAdvantage Salmon as environmentally dangerous is not supported by the facts. Representing AquAdvantage Salmon as unhealthy or dangerous to consumers is also not supported by the facts. Similarly, AquaBounty does not believe the argument that AquAdvantage Salmon threatens the sale or market of Alaskan salmon. We hope that reason will prevail in this discussion and that the Alaskan legislature will not succumb to untruthful rhetoric or fearmongering to advance a case for misguided economic protectionism.

Respectfully,

Ronald L. Stotish, Ph.D. CEO,
AquaBounty Technologies