



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907)586-9400 phone
ata@gci.net

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Representative Louise Stutes, Chair
House Fisheries
Alaska House of Representatives
State Capitol (Mail Stop 3100)
Juneau AK 99801-1182

RE: HJR 12 Labeling of Genetically Engineered Foods

Dear Representative Stutes and Committee Members:

The Alaska Trollers Association (ATA) supports HJR 12, which encourages Congress to enact legislation requiring the clear labeling of genetically engineered (GE) food products. We believe that HJR 12 reflects the wishes and concerns of the vast majority of not only Alaskans, but Americans, who wish to make informed choices about the foods they eat.

ATA represents the interests of commercial hook and line salmon fishermen who operate in state and federal waters; our members are committed to delivering wholesome, high quality seafood to market. Our members believe that consumers deserve clear information and a choice when it comes to the foods they eat.

To date, more than 64 other countries have some form of mandatory labeling requirement for GE foodstuffs.¹ U.S. policymakers have taken a different approach and mostly remain silent on the matter. However, just last year Congress passed legislation that not only denied mandatory labeling of GE products, it also infringed on the rights of the states, including Alaska, to require labeling of products being sold within state borders. That law was dubbed the Denying American's Right to Know Act (DARK Act).

Numerous public opinion surveys have been conducted in the U.S. and reveal that up to 95% of respondents – of any voter persuasion - favor the labeling of GE seafood; about half consistently say they would not choose to eat GE seafood if given a choice. But how can they tell which is which if it's not labeled? In the case of salmon, we suspect some might simply choose to avoid it.

Genetically engineered foods have been around for about 20 years, with apples being a recent addition. By 2012, FDA estimated that 93% of the soybeans and 88% of the corn planted in the US was modified. Very few of those products are labeled. In 1992, FDA established a policy that would allow approved GE foods to be sold without labeling, because those foods are not viewed as “materially” different from non-GE varieties. FDA considers “material” differences as those that can be recognized by the human senses, like taste and smell. So, the use of genetic engineering meets FDA's limited threshold for “materiality” the same, simply because the genetic and molecular changes can't be seen. Since 2009,

¹ [GE Food Labeling Laws](#)

FDA has endorsed this same labeling policy for GE animals. Currently in the GE pipeline for approval is several species of plants and fish, mosquitos, pigs, goats, cattle, and more.

The Alaska Legislature has responded to the call for consumer information through labeling since 2005, with the passage of several bills specific to farmed and GE salmon. A sponsor of the first bi-partisan bill (SB 25²), Representative Gary Stevens (R-Kodiak) noted that labeling, “...helps highlight Alaska seafood as distinct from genetically modified seafood, doing away with any vagueness that may exist to the consumer when purchasing seafood...” His co-sponsor Senator Kim Elton (D-Juneau) said he was, “... encouraged by the bipartisan support this bill received. It is a sign that, when it comes to seafood, Alaskans stand up for informed consumers and friends and neighbors working in the wild fish industry.”

Fishermen are particularly alarmed by the cavalier approach the nation has taken on the issue of genetically engineered foodstuffs. Once you allow a food to be modified, it becomes different and the level of risk changes, period. FDA’s own scientists made that point during the 1990s debate on the agency’s policy on GE plants. And while the scientific community is not yet done analyzing the risks of genetically engineered foods, it is well known that there are professional disagreements regarding its safety. At minimum, questions regarding toxicity and allergens do not appear to have been thoroughly vetted and resolved. This is particularly true for GE salmon.

FDA chose to analyze this first ever GE animal as a drug - not a food - which in turn shrouded the approval process in secrecy in order to protect the patents of the developer, AquaBounty. That meant the public was never allowed to engage in a full and transparent review process prior to approval of GE salmon. Despite overwhelming public requests to do so, the FDA ultimately decided that it would not require labeling of GE salmon. However, the agency says that it will allow the commercial salmon industry to voluntarily label its products as not containing GE material. This places the burden of public disclosure squarely on the existing seafood industry, similar to what the non-GE farm and ranch sector across the nation have been dealing with for years.

While the GE salmon and other foods may ultimately prove safe and wholesome, there is no doubt that they are unlike the foods that most of us grew up on. These are processed food at the most basic level and should be labeled accordingly, particularly when no independent science exists to prove that these products are 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 couple decades ago was inconceivable.

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. The buying public must be allowed to make an informed choice and labeling will afford them that option. It is our hope that Alaska will encourage Congress to help make meaningful labeling programs available for consumers, particularly if the federal agencies continue to turn a deaf ear to the public.

Thank you for considering ATA’s point of view on this matter.

Best regards,



Dale Kelley
Executive Director

² [SB 25](#)