

ALASKA STATE LEGISLATURE INTERIOR DELEGATION

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Representative Woodie Salmon
Representative Mike Kelly
Representative David Guttenberg
Representative Scott Kawasaki
Representative Jay Ramras
Representative Tammie Wilson
Representative John Harris

October 4, 2010

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

Dear Commissioner,

The Interior Delegation of the Alaska Legislature is writing to convey our overwhelming opposition to the genetically engineered AquaAdvantage salmon proposed for marketing by AquaBounty. There are clear issues concerning the safety of consuming the AquaAdvantage salmon, the ability to contain the engineered fish, and the process by which this product is certified.

We feel there are too many unanswered questions concerning the potential dangers of this product. Our biggest concern is the potential damage to the population of wild salmon which is vital to the Alaska economy. The AquaAdvantage salmon could wreak havoc on local populations if any were to escape and intermingle with wild salmon. Interbreeding could devastate natural populations. AquaBounty assures that no genetically engineered fish could escape, and even if they did they could not breed, but these claims are not backed up by definitive scientific research. They admit that as many as five percent of the engineered salmon could be immune from the sterilization process. If AquaBounty sells modified salmon eggs to other commercial farms, which they currently plan to do, the risk of escape and destruction will only increase.

Additionally, the health hazards surrounding the AquaAdvantage salmon have not been fully investigated. Given that the FDA is currently not planning on labeling genetically engineered fish, this could pose a health hazard for consumers. People who want to avoid genetically modified salmon would have no way of knowing what they are buying, and many may choose to not purchase salmon at all. The testimony from Consumers Union states that studies were done using much smaller fish than those normally consumed, and that too few fish were in the samples. The data provided by AquaBounty was deemed incomplete by the Consumers Union. One study even showed a potential risk of allergic reaction triggered by the salmon. In short, the studies done by AquaBounty on their own product, upon which are you basing your decision, are inadequate.

The wild salmon fishing industry is vital to Alaska as a source of jobs, revenue and food. Genetically engineered salmon pose a grave threat to Alaska's economy, especially if the FDA does not require AquaBounty to label the fish as modified. If these fish are not labeled, a wary public may avoid salmon altogether, harming our economy.

A decision of this importance and with the potential health and economic impacts should only be made after all public concerns are satisfied beyond any doubt. We urge you to withhold your approval of this application. Thank you for your consideration of our concerns.

Sincerely,

Senator Joe Thomas, Chairman

Representative Woodie Salmon

Senator Albert Kookesh

Representative Mike Kelly



Senator Joe Paskvan Representative



David Guttenberg

Representative Scott Kawasaki

cc: The Honorable Barack Obama, President of the United States
The Honorable Mark Begich, United States Senate
The Honorable Lisa Murkowski, United States Senate
The Honorable Don Young, United States House of Representatives
Bernadette M. Dunham, D.V.M., Ph.D., Director, Center for Veterinary Medicine, Food and Drug Administration
Aleta Sindelar, Center for Veterinary Medicine (HFV-3), Food and Drug Administration