



Alaska Trollers Association

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Representative Kurt Olson, Chairman
Labor & Commerce
Alaska State Legislature
Juneau, AK 99811

RE: HJR 28 Labeling of Genetically Engineered Foods

Dear Representative Olson and Committee Members:

The Alaska Trollers Association (ATA) supports HJR 28, which opposes the approval of AquaBounty AquAdvantage genetically engineered salmon; promotes the protection of wild salmon; and, requires the clear labeling of genetically engineered (GE) food products. We believe that HJR 28 reflects the wishes and a concern of the vast majority of Alaskan's who care about the sustainability of wild salmon and trout and 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 member's annual harvests of have been reduced for many decades as part of a coastwide program to rebuild Chinook stocks harmed, in large part, by habitat loss and degradation in the Pacific Northwest and Canada. ATA strongly supports practical efforts and advocacy by the states and industry in support of protecting salmon and rehabilitating habitat.

Genetically altered animals and fish present a new element in food culture and it is unknown what, if any, negative impacts will be seen as they are introduced into both the food supply and the environment. Even though the law does not allow GE fish to be raised in the U.S., fishermen speak out against it, due to the possibility those laws could change in our country or Canada. Alaska fishermen have long pointed to the risks associated with the gauntlet of marine fish farms placed in the paths of migrating salmon in U.S. and Canadian waters from the Strait of Juan de Fuca nearly to Haida Gwaii. Operators of these farms raise Atlantic salmon. Sea lice and disease transference between wild and farmed salmon, and predation and competition from escapees are already key threats. Any shift by the fish farm industry to raising fast growing GE salmon will heighten concerns even if closed containment is used; accidents happen. Furthermore, Atlantic salmon are more closely related to trout than Pacific salmon and pose a risk to ocean run steelhead, cutthroat, and instream trout species, particularly in light of research suggesting some trout can spawn with genetically modified Atlantic salmon.

AquaBounty assures the public that their GE salmon will be the safest type of sterilized animal (triploid females), and that's true. However, this method of sterilization is known to fall short of a 100% success rate. Non-sterile animals will also be needed to replenish the farms supply of

fish, so ensuring containment will be of critical importance. Interestingly, one study revealed that about 20% of a group of Chesapeake clams subjected to successful triploid (sterile) technology changed back to diploid (fertile) in time. What if that occurs with fish?

GE salmon are hyped for their ability to grow bigger and faster; with producers highlighting the desirability of the shorter time to market and less impact on the environment, in part as a result of sterilization. However, study results are mixed, with some suggesting *triploidization can result in unpredictable performance and fitness outcomes* (Johnson et al., 2007). It's difficult to guess what the outcome will be once these fish are in production, but is not beyond the scope of reason to think that if these fish do not grow at the rate anticipated, or present with significant health challenges, there could be a push by industry to fall back to the use of diploid (fertile) fish.

Unlike Pacific salmon, Atlantic salmon are multi-year spawners and any escapes could be in the system for quite some time. Some advocates of GE salmon point to the fact that Atlantic salmon have yet to be found colonizing in Pacific waters. True, but adults and juveniles have been found in West Coast rivers. GE salmon will be produced specifically for traits that could make them more (or less) successful at survival and reproduction than their non-altered cousins, but they could still transmit disease, compete for food, and even disrupt spawning areas and behavior of other species, especially if they are larger. The fact is that there has not been enough long-term study of these animals to provide needed assurances that they are harmless if inadvertently released into a watershed. It's not just areas with salmonid populations that could bear the brunt of escape problems. Our nation currently spends billions of dollars per year in its attempt to eradicate non-indigenous species. Despite AquaBounty and other biotech firms assurances that these fish will only be spawned in Eastern Canada (home to wild Atlantic salmon) and grown out in Panama, anyone studying the issue is well aware that a number of U.S. firms have already expressed interest in raising these fish in our country.

It is troubling that the FDA has resisted a call for anything but a voluntary labeling program for GE salmon. Disappointingly, FDA's policies with regard to honoring public opinion on labeling have changed over time. Upon approval of irradiated food, FDA ruled that it must be labeled, but not because the products were considered unsafe – in most cases, quite the contrary. It was because the agency heard loud and clear that the public wanted descriptive labeling and FDA acknowledged that consumers have a right to material facts about their food. FDA's position, first on crops and now fish, changed substantially in 1992, with a policy that no labeling would be required for foods it found 'materially the same'. This policy was applied to GE animals in 2009; GE salmon were deemed to be 'materially the same' as the non-GE counterparts. While GE Atlantic salmon may look and taste like a regular Atlantic salmon, many people don't believe that a behemoth version gene spliced with two other species of fish is the same thing at all. In fact, manufacturing the GE fish involved introduction of foreign DNA material, making parts of its most basic aspects materially different than the classic model. Still, FDA does not think this critter needs a sticker to allow the public to choose whether or not to eat it. And unless that policy changes, labels will probably be denied for the pigs, goats, cattle, and other GE animals that are currently in the pipeline for approval.

There is no clear message from the scientific community regarding the safety of GE foods. Some scientists wholeheartedly endorse GE and others question allergens and a suite of other potential negatives. While GE salmon may ultimately prove safe and wholesome, there is no doubt it is unlike the foods that most of us grew up on. It is a processed food at its most basic level, and should be labeled accordingly, particularly when little independent science exists to

prove its safety. 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.

Numerous public opinion surveys have been conducted in the U.S. that show up to 95% of respondents favor the labeling of GE seafood; about half consistently say they would not eat GE seafood if given a choice. The numbers vary, and it depends on how the questions are asked, but clearly, most people want to know. Of course, how can they know which is GE if it's not labeled? Will they choose not to eat wild salmon if they can't be certain it's not modified?

FDA has been labeling our foods for several generations. We know the number of calories and are advised of the known presence of all kinds of spooky sounding chemicals down to fractions of a percent. FDA is well aware of the breadth of the public's call for GE labeling, having seen similar results since polls began in the 1990s. The agency has even seen polls revealing that many will still buy GE products, just as they buy labeled irradiated foods; folks simply want to know - and to choose. If the FDA won't require labeling for GE salmon, it is our firm hope that Alaska will.

The Alaska Legislature has responded to the call for consumer information through labeling since 2005, with the passage of several bills specific to the labeling of farmed and/or GE salmon. One of the first bill's (SB 25¹) sponsors, Representative Gary Stevens (R-Kodiak), noted, *"[t]his bill 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) 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."* Fortunately, questions with regard to transparency about our food supply consistently transcend party affiliation here in Alaska.

Labeling of GE salmon and other 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 be among the states leading the way to help make labeling available for consumers, particularly if the federal agencies continue to avoid doing so.

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

Best regards,



Dale Kelley
Executive Director

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http://www.legis.state.ak.us/basis/get_bill_text.asp?hsid=SB0025Z&session=24