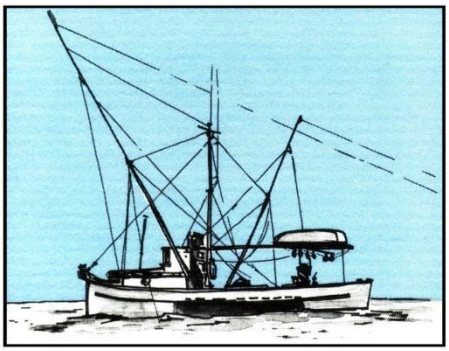

Alaska Trollers Association

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February 1, 2013

Representative Paul Seaton, Chairman
House Special Committee on Fisheries
Alaska State Legislature
State Capitol
Juneau, AK 99801-1182

RE: HJR 5 Oppose FDA Approval of GE Salmon

Dear Representative Seaton and Committee Members:

The Alaska Trollers Association (ATA) strongly supports HJR 5, which seeks, among other things, to persuade the Food and Drug Administration (FDA) to deny the approval and marketing of genetically engineered salmon in the United States.

ATA is pleased to read the strong statements embodied in HJR 5. We believe the resolution appropriately reflects not only the concerns and wishes of most Alaskan's, but also those of a vast majority of American citizen's.

It is time the public be allowed the opportunity to openly consider and debate the issues surrounding the most intimate of topics – our nation's food supply. The FDA has a long way to go before it can truthfully say that the risks of genetically engineered salmon have been fully evaluated and that this is a safe food choice. It is well known that within the scientific community, professional disagreement exists regarding the safety of this and other genetically modified foods. More data and peer review are necessary to resolve and clarify those concerns.

Poll after poll has reveals the public's distrust of genetically engineered foods, yet the FDA has been allowed to conduct its analyses of GE salmon under a cloak of secrecy, in order to protect the patent rights of the companies involved. Of significant concern is that fact that this review is being conducted under the rules governing animal drugs – not food for human consumption – and is based on too little data provided by the developer, and too little review by FDA or independent scientists. Some of those data sets are pretty skimpy and proposed scenarios idyllic, which is not reflective of conditions that would exist if this animal was raised at production scale.

Here in Alaska, our concerns extend beyond the food on our plates to the fish with tails that transit our waters. Farmed fish from British Columbia and Washington State escape on a regular basis and are already harvested in our fisheries. Our members are concerned about the impact of those fish on our wild stocks - everything from disease transmission to competition for food and disruption on the spawning grounds. What new impacts will genetically engineered fish bring? At this point, we just don't know, but the risk seems far too high for a fish dependent state like our own.

I have attached for the record ATA's comments to the FDA on genetically engineered salmon and labeling requirements. These comments were submitted for the only public comment period that was allowed for GE

salmon. Only one public hearing was held, by the FDA's veterinary committee, and participation was limited to a handful of people. Note that FDA only requested comments on labeling – not the question of whether or not GE salmon should be approved for human consumption. Ironically, FDA has no authority to label anything, leading us to wonder why they even opened that comment period.

It is our hope that FDA's current Finding of No Significant Impact (FONSI) will be rejected, because the basis for the decision appears flawed. FDA has failed to adequately evaluate the impact of this designer fish on either humans or the environment. The agency must evaluate this product as a food source – not a drug – and the data and FDA's analyses should undergo rigorous peer review. A full Environmental Impact Statement and consultation under the Endangered Species Act, on both the East and West Coasts, are both appropriate and necessary parts of that process. And the process will be exceedingly important, as this first-ever review of a GE animal will set the precedent for the other animals currently in the pipeline for review.

If, at the end of the day, FDA and knowledgeable scientists and health experts deem this salmon safe for consumption, a robust statutory and regulatory package will be required, including provisions to protect both humans and the environment. In addition, FDA, or another appropriate agency, should be given direction and authority to ensure that all life stages and final product forms are prominently labeled. This will require industry support and a substantial government investment in monitoring and enforcement. We, the people, must be given an opportunity to accept, or decline, participation in the grand GMO experiment. Labeling will be essential towards that end.

In sum, the outcome of FDA's GE salmon review is of significant concern to our association. ATA appreciates and fully supports the intent of HJR 5 - we urge you to vote in support.

Thank you for considering ATA's point of view on this matter. Should you have additional questions, please don't hesitate to contact me about this or other issues of concern to the commercial fishing industry.

Best regards,

Dale Kelley

Dale Kelley
Executive Director