State Capitol

Juneau, Alaska, 99801



October 1, 2010

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

Dear Commissioner,

We are writing to express our serious opposition to allowing AquaBounty to market genetically engineered salmon. After studying the research surrounding their application, we feel there are too many unanswered questions concerning the potential dangers to wild salmon stocks, detrimental effects to our state's economy, and risks to public health. Even more troubling is the apparent lack of rigorous scientific scrutiny as this project is rushed through the FDA approval process.

There is a very real fear that genetically modified salmon could wreak havoc on populations of wild salmon. It's well known that farmed salmon periodically escape into the environment. In the wild, genetically modified salmon could spread disease, out-compete wild salmon for precious resources, and interbreed to disastrous effect. (AquaBounty says it has taken precautions to sterilize its salmon, but admits the process may not work in approximately 5% of cases.) Also, as AquaBounty follows through on its plan to sell modified salmon eggs to other commercial farms, this risk of escape and destruction will only grow larger.

Alaskans rely on the wild salmon fishing industry as a source of jobs, revenue and food. Genetically engineered salmon pose a threat to Alaska's economy, especially if the FDA does not require AquaBounty to label the fish as modified. The labeling of genetically modified salmon has been mandatory in Alaska since 2005 and a recent national survey showed 95% of the public want genetically engineered animals labeled in supermarkets. If these fish are not labeled, a wary public may avoid salmon altogether, harming our economy.

As AquaBounty's salmon would be the first genetically modified animal food product on the market, it is also troubling to find a lack of in-depth research into the potential health risks to humans. The data provided by AquaBounty reportedly was incomplete, and one study even showed a potential risk of allergic reaction triggered by the salmon. We strongly feel there must be a long-term study of the potential health risks posed by the salmon, especially to the more vulnerable health systems of children and pregnant women.

We are disturbed by the overall lack of rigorous scientific scrutiny as part of the approval process as a whole. The nonprofit watchdog group Consumers Union has outlined the problems, pointing out there have been no independent studies into these engineered fish and the data provided by AquaBounty "included too few fish, relied on insensitive test methods and didn't ask the right questions."

A decision of this magnitude must not be made in haste with flawed scientific data. We urge you to withhold your approval of this application. Thank you for your consideration of our concerns.

Sincerely,

Bill Wielechowski

Senator Bill Wielechowski

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Senator Johnny Ellis

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Senator Dennis Egan

Bettye Davis

Senator Bettye Davis

Representative Alan Austerman

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Representative Bryce Edgmon

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Representative Lindsey Holmes

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Representative Cathy Munoz

Paul K Sealo

Representative Paul Seaton

Senator Gary Stevens

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Senator Donald Olson

Senator Joe Thomas

Representative Sharon Cissna

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Representative David Guttenberg

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Representative Beth Kerttula

Peter Peterses

Representative Pete Petersen

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Representative William Thomas, Jr.