

Testimony

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Congressional Briefing: Genetically Engineered Salmon

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ATA represents commercial hook and line salmon fishermen who operate in state and federal waters off Alaska. The troll fishery is the largest of the state's salmon fisheries; about one of every 40 people in the Southeast region works on a troll boat. Our members are committed to delivering sustainable, wholesome, high quality seafood to market. It is important to us that consumers have the opportunity to know precisely what kind of seafood they are buying for the dinner table, be it the species of fish or whether it's been modified.

Trollers are used to transparency. About the only fish secrets we're allowed to keep is our favorite fishing lure and maybe today's hot spot – if we're lucky. We catch the fish and deliver them to a processor where each one is counted, weighed, and identified by species and other attributes. What you see is what you get - and a king salmon is a king salmon, through and through.

GE salmon have a surprise inside, yet FDA says they are substantially the same as wild Atlantic salmon. With DNA from 3 species - one of which is from an entirely different order of the Animal Kingdom - how can they be anything but different? Because these fish present an unclear level of risk to the environment and public health, fishermen want to see them labeled.

Many scientists, including the team that reviewed the GE salmon application in Canada, point to the possibility that these fish could survive in the wild and compete with resident fish. Non-indigenous and invasive species already cost our nations millions of dollars a year and this could become another one. The technology to produce all sterile female fish has some known issues; FDA and AquaBounty readily admit that at least 5% of the fish could be viable.

Concern in Alaska is not so much that this fish could spawn with Pacific salmon, but that they might disrupt other spawning fish. They could also compete for food and transfer disease. Atlantic salmon are a multi-year spawning trout – not a salmon – and they are large and voracious, even without the boost of genetic manipulation. And, GE salmon has already proven capable of spawning and passing on modified DNA to brown trout.

As for raising these fish in tanks, the fish farm industry often says this would be an economic loser, at least at production scale. Then there is the large volume of water needed to raise salmon, even in a recirculation system; and of course you have to deal with the effluent.

Food safety is a potent issue and there is not enough data to fully analyze the risks. 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. Once you allow a food to be modified, the level of risk changes, period. At minimum, questions regarding toxicity and allergens do not appear to have been

thoroughly vetted and resolved. In our industry we know that a single can of bad fish can harm people and ruin salmon markets for many years. Any health problems with GE salmon could reverberate through all farmed and wild salmon markets.

Numerous public opinion surveys have been conducted in the U.S. and Canada, with the vast majority of respondents favoring labels for GE seafood; more than half consistently say they will not eat salmon at all if GE fish area not labeled. The numbers vary, but clearly, most people want to know what's on their plates. Of course, how will they know which is GE if it's not labeled?

It's puzzling. FDA requires labeling for thousands of ingredients, additives, and processes. We get calorie counts and are advised of spooky sounding chemicals to fractions of a percent. Labels let us know whether our orange juice is frozen or from a concentrate and if the holiday turkey has been subjected to irradiation. In Vermont, you are even told that M&M's are made with GMO's. Why then it is so difficult to secure a simple sticker on the package of the very first GE animal to be approved for consumption?

The nation's buying habits reveal that most people don't object to engineered foods and many recognize great value in them. Still, there are also those among us who either do not want, or choose to minimize, genetically engineered foods in their diets. Without labeling, it is impossible to make that choice.

FDA says mandatory labeling of GE foods is unnecessary, because they are 'materially' the same as the unmodified versions. If it looks and swims like an Atlantic salmon - or tastes like corn on the cob - apparently it is. Instead of labeling the new product, the agency suggested that the seafood industry label wild fish – placing the burden of this federal action squarely on the shoulders of small business.

But appearances aside, there is a material difference between modified and unmodified foods; why else does GE technology exist if not to change an organism to enhance something significant - like growth rates? That is not to say that GE products will prove harmful simply because they are different, just that not everyone is interested in being part of the long term experiment; a person should be allowed to opt out, and as we know, some already plan to do just that. Without a label, our industry will suffer as a result of that decision.

A recent online article on GE salmon elicited some worried feedback like this response from reader T. Papa, *'[N]ever eating salmon again.'* Given the public's strongly stated desire for labeling, we take this concern, and its potential impact on our industry, quite seriously.

FDA used to show more appreciation for the consumers preferences. In the final rule requiring labels for irradiated foods, the agency indicated that labeling was based not only on physical changes to the food, but also whether consumers thought that information was important. FDA emphasized that; *[I]labeling will enhance consumer confidence by providing assurance of the consumer's right to choose.* Precisely!

While the GE salmon may ultimately prove safe and wholesome for both the public and the environment, there is no doubt that it is unlike the foods that many of us grew up on. It is a processed food at its most basic

level, and should be labeled accordingly. 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 of decades ago was inconceivable.

Labeling of GE salmon boils down to one of the most fundamental of human needs and rights –access to wholesome foods and information about how they are produced. We hope that congress and the states will help get GE fish labeled, particularly if the FDA continues to resist.

Thank you.