Honorable Filipe Fuentes, Chair  
Assembly Appropriations Committee  
State Capitol  
Sacramento, CA 95816

RE: AB 88 Labeling Requirements for Genetically Engineered Salmon

Dear Assembly Members:

The Alaska Trollers Association (ATA) strongly supports AB 88, which would require the clear labeling of genetically engineered salmon. As a representative of an industry affected by this issue, I hope you will consider adding our letter to the record.

ATA represents the interests of hook and line commercial salmon fishermen who operate in the waters off Alaska, but it might interest you to know that some of our members are residents of California, and that many Californians’ work in other Alaska fisheries. In 2010, over 1,500 of Alaska’s permit holders and deckhands listed California as their home state.1 Fishermen in California and Alaska share many linkages, from common processors and transportation companies, to boat builders and gear suppliers, and even the consumers who buy our fish. We also share an abiding concern for the nation’s fisheries resources and a commitment to deliver wholesome products to market.

AB 88 issues strong support for wild salmon, consumers, and the working fishermen who serve them. We believe that the sponsors pushing to label genetically engineered (GE) salmon in California appropriately reflect the concerns and wishes of a vast majority of American citizen’s. As the bill aptly notes, some public opinion surveys reveal as many as 95% of those polled want labeling of GE seafood, with 50% of the respondents saying they would not eat GE seafood.

The Alaska Legislature responded to this very concern in 2005; our state now requires mandatory labeling of GE salmon. One of the SB 252 sponsor’s, Representative Gary Stevens (R-Kodiak) noted, “This 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...” 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.” It seems only right that questions involving our food supply should transcend party affiliations.

Fishermen are particularly alarmed by the cavalier approach the nation has taken on the issue of genetically engineered foodstuffs. Once you allow a food to be modified, it becomes different and the level of risk changes, period. FDA’s own scientists pointed that out during the 1990s debate on the

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1 State of Alaska Commercial Fisheries Entry Commission  
2 http://www.legis.state.ak.us/basis/get_bill_text.asp?hsid=SB0025Z&session=24
agency’s policy on GE plants. 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. At minimum, questions regarding toxicity and allergens do not appear to have been thoroughly vetted and resolved. The FDA does not appear to have conducted the necessary science on GE salmon, and relied on the developer to supply the review data. FDA’s own Veterinary Advisory Committee last September noted gaps and recommended additional study on key health, animal safety, and environmental topics.3 Securing meaningful answers could take quite some time.

While the GE salmon may ultimately prove safe and wholesome, there is no doubt that it is unlike any other salmon available today. It is a processed food at its most basic level, and should be labeled accordingly, particularly when no independent science exists to prove that it is safe. 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 few years ago was inconceivable.

Our members are concerned about the impact of those fish on our wild stocks. Farmed fish from British Columbia and Washington State escape on a regular basis and are already harvested in Alaska, and no doubt other states – perhaps even your own. Escaped fish elicit a variety of concerns - everything from disease transmission, to competition for food, to 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 the fish dependent states.

Engineered salmon are simply different than other salmon and that fact concerns a great many people. When standing at the seafood counter, how will those who folks know which fish are modified and which are not? They might just opt out of buying salmon altogether. We in the seafood industry know far too well that there is often confusion when it comes to the seafood market. The wild seafood industry will bear the direct cost if consumers turn away; jobs will be lost - from California to Alaska.

Labeling of GE 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 the state’s will help make labeling available for consumers, particularly if the federal agencies decline to do so.

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

Best regards,

Dale Kelley
Executive Director