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Governor Sean Parnell
STATE OF ALASKA

December 14, 2011

The Honorable Mark Begich
Chairman
U.S. Senate Subcommittee on Oceans,
Atmosphere, Fisheries, and Coast Guard
420A Hart Senate Office Building
Washington, DC 20510

The Honorable Olympia Snowe
Ranking Member
U.S. Senate Subcommittee on Oceans,
Atmosphere, Fisheries, and Coast Guard
227 Hart Senate Office Building
Washington, DC 20510

Re: Environmental Risks of Genetically Engineered Fish

Dear Chairman Begich and Ranking Member Snowe,

I commend the subcommittee for its attention to the environmental risks associated with genetically engineered fish. My administration continues to have strong concerns regarding AquaBounty's application to market genetically engineered Atlantic salmon. Due to the significant potential threats genetically engineered salmon pose to the environment, consumer health, and the wild seafood industry, we have urged the United States Food and Drug Administration (FDA) to withhold approval of this application. Furthermore, we question whether the application has received sufficient scientific and public scrutiny, and are troubled by the lack of transparency that has marked the review process.

Threat to Wild Salmon Stocks

Like many, we fear genetically engineered salmon could jeopardize the health of wild salmon stocks if released into the wild. Genetically engineered salmon could spread disease, cross-breed with wild salmon, and out-compete them for food and mates. The United States Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration (NOAA) have recognized these risks, and warned the FDA about the potential dangers associated with escaped genetically engineered fish in a joint letter to the FDA in 2001, and the National Academy of Sciences in a 2002 study.

While AquaBounty proposes containment measures to reduce the chance of genetically engineered salmon escapes, these measures would not eliminate the risk. That risk would grow if AquaBounty supplies genetically engineered salmon eggs to a network of commercial farms, as the company intends. Alaskans are well aware that fish farming containment measures are not fail-safe. Commercial fishermen in Alaska have caught hundreds of Atlantic salmon, escaped from fish farms in Canada and the state of Washington.

Insufficient Consultation with National Marine Fisheries Service (NMFS)

We have urged the FDA to honor a provision authored by the late Senator Ted Stevens and Senator Lisa Murkowski, which became law as part of the Food and Drug Administration Amendments Act of 2007 (P.L. 110-85). The provision requires the Commissioner of FDA “to consult with the Assistant Administrator of the NMFS of the National Oceanic and Atmospheric Administration to produce a report on any environmental risks associated with genetically engineered seafood products, including the impact on wild fish stocks.” This statutory language was intended to ensure NOAA played a role in the FDA’s approval process for genetically engineered seafood products. We are not convinced that this statutory obligation has been fully met.

Threat to Human Health and Consumer Confidence in Salmon

Before genetically engineered salmon is allowed into the United States’ food supply, more rigorous scientific research is necessary to ensure its long-term consumption is safe for a large cross section of the population, including sensitive populations such as young children and expectant mothers. As you know, salmon is widely recognized for its health benefits, and many consumers purchase salmon for this reason. Allowing a company to sell a genetically engineered product that has not been the subject of sufficient long-term testing would undermine consumer confidence in all salmon products as well as the health benefits of salmon consumption.

Economic Impact on Wild Seafood Industry

Genetically engineered salmon could also erode the strength of the wild seafood industry, especially if appropriate labeling is not mandated. For Alaska, the results could be devastating. Alaska’s salmon industry is critically important to the state’s economy, and is the primary source of employment and revenue in many of our coastal villages. Farmed salmon has already threatened the position of Alaska’s wild salmon in the seafood market. Alaska salmon, however, regained its status thanks to significant investments in infrastructure, product quality, and marketing. Marketers focused on distinguishing the health benefits and taste properties of Alaska salmon. Studies still show, however, that consumers struggle to distinguish seafood in the marketplace. Adding genetically engineered salmon to the store shelf could further complicate the efforts of consumers seeking healthy, wild seafood products.

Lack of Public Participation and Transparency

In addition, my administration is disturbed by the process employed by the FDA to review AquaBounty’s application. The environmental and public health implications associated with genetically engineered salmon and the significance of approving the first genetically modified animal for consumption in the United States warrants the highest level of public participation and transparency. We do not believe that FDA’s review process for veterinary drugs allows for a sufficiently public and transparent process.

Lack of Genetically Engineered Labeling

FDA’s statements that suggest it may not be able to require labeling for AquaBounty’s genetically engineered salmon is also troubling. The State of Alaska does not support approval of genetically engineered salmon for sale. If, despite significant environmental and human health concerns, the FDA approves such an application, genetically engineered salmon sold in the United States should

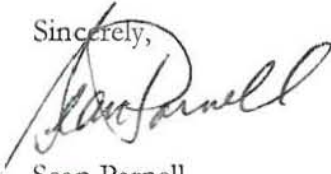
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be clearly labeled "genetically modified," so consumers can make an informed choice. This label should be prominently displayed on the front of the package in a contrasting color, and a minimum print size should be required. Alaska statutes require the conspicuous labeling of such products sold in the state.

For the reasons mentioned above, I support legislation to prevent the FDA's approval of genetically engineered salmon for human consumption and to require appropriate labeling for any genetically engineered seafood products.

I appreciate your consideration of Alaska's position on this important issue and respectfully request that this letter be included in the hearing record.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean Parnell", written over a circular stamp or mark.

Sean Parnell
Governor

cc: The Honorable John Rockefeller, Chairman, United States Senate Committee on Commerce, Science, and Transportation
The Honorable Kay Bailey Hutchison, Ranking Member, United States Senate Committee on Commerce, Science, and Transportation
The Honorable Lisa Murkowski, United States Senate
The Honorable Don Young, United States House of Representatives
The Honorable Cora Campbell, Commissioner, Alaska Department of Fish and Game
The Honorable Larry Hartig, Commissioner, Alaska Department of Environmental Conservation