



22 February 2016

Senate Health Care Committee
Hon. Laurie Monnes Anderson, Chairwoman
Oregon State Legislature

Testimony of AquaBounty Technologies on Proposed Amendments to HB 4122 A

AquaBounty understands and appreciates the state interest in ensuring that Oregon consumers are fully informed about the fish they purchase for consumption but the proposed amendments to HB 4122 A requiring labeling of genetically engineered fish are in our view unnecessary and poorly conceived.

If the goal of the proposed amendments is to help consumers avoid confusion at the time they purchase fish, we see them having the opposite effect. When announcing the approval of AquAdvantage® Salmon, the U.S. Food and Drug Administration (FDA) stated that, “After an exhaustive and rigorous scientific review, FDA has arrived at the decision that AquAdvantage Salmon is as safe to eat as any non-genetically engineered (GE) Atlantic salmon, and also as nutritious.”

Reference: <http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm472487.htm>

The FDA has determined GE salmon to be the same as, and as safe as, traditional Atlantic salmon. The very act of labeling it will suggest to the consumer that there must be a difference, otherwise why label? Labeling a food that has no safety, nutritional, or composition differences contravenes the FDA policy since 1984 that food labels be truthful and convey useful information on composition, nutrition and safety. FDA policy does not require labels for method of production, which is the clear intent of the proposed amendments.

Similarly, the inference in the amendment regarding consumer health and welfare is that there are negative health effects from the consumption of AquAdvantage Salmon, which is objectively wrong, false and misleading. A detailed review of food safety studies by the FDA found that AquAdvantage Salmon is an Atlantic salmon and is as safe to consume as other Atlantic salmon. It is in fact arguable that there is more food safety data on AquAdvantage Salmon than on any other type of salmon presently offered for sale to consumers.

Lastly, implying that identifying genetically engineered fish will help to protect Oregon’s commercial fishing economy and environment is unfounded for the following reasons:

1. AquAdvantage Salmon are all-female and sterile, meaning they cannot mate with themselves or with other Atlantic salmon.



2. AquAdvantage Salmon are Atlantic salmon. The scientific literature is clear that Atlantic salmon cannot mate with Pacific salmon and produce viable eggs, as they are different species.
3. The scientific literature is also clear that transgenic salmon are poor competitors and would probably not survive if released into the wild. The transgene would likely disappear from the population in a single generation.
4. AquAdvantage Salmon are required, under the conditions of use for its FDA approval, to be farmed only in land-based, contained aquaculture systems.
5. Our approved grow-out facility is located in the highlands of Panama, where the risk of escape is zero due to the multiple, redundant physical barriers employed to ensure containment of the fish. Panamanian and FDA regulatory inspectors visit this site frequently to assess the integrity of the facility and our standard operating procedures.
6. In over 25 years of research and culturing of AquAdvantage Salmon, there has never been an escape from our facilities in Canada or Panama.
7. As stated in the FDA review documents and the FDA approval announcement, AquAdvantage Salmon represents a very small risk to the environment of the United States when farmed in land-based systems. The FDA issued a Finding of No Significant Impact (FONSI) after a conducting an Environmental Assessment of AquAdvantage salmon raised under conditions of the NADA approval.

Clearly, there will be no impact on the commercial, sport and subsistence fishing industries from the farming of AquAdvantage Salmon.

Representing AquAdvantage Salmon as environmentally dangerous is not supported by the facts. Representing AquAdvantage Salmon as unhealthy or dangerous to consumers is also not supported by the facts. Similarly, the argument that AquAdvantage Salmon threatens Oregon's commercial fishing economy and environment is completely unfounded. The United States already imports over two hundred fifty thousand tons of Atlantic salmon each year from Norway, Chile, Canada, Scotland, and the Faroe Islands. It is this import market which AquAdvantage salmon will reduce. We hope that reason will prevail in this discussion and that the Oregon legislature will not succumb to untruthful rhetoric or fearmongering to advance a case for misguided economic protectionism.

Respectfully,
Ronald L. Stotish, Ph.D.
CEO, AquaBounty Technologies