



MARYKNOLL OFFICE FOR GLOBAL CONCERNS
Peace, Social Justice and Integrity of Creation
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November 10, 2010

RE: Docket No. FDA-2010-N-0385 [Decision Maker],

Division of Dockets Management (HFA-305)
5630 Fishers Lane, Rm 1061
Rockville, MD 20852

RE: Docket No. FDA-2010-N-0385
Labeling of AquaAdvantage genetically engineered salmon

On behalf of missionaries serving in 35 countries in Asia, Africa and Latin America, I write today to express our opposition to the approval of AquaBounty's genetically engineered, AquaAdvantage salmon (Docket No. FDA-2010-N-0385). We believe that this salmon creates risks for the U.S. public as well as for citizens in other countries who will be involved in farming operations raising this form of salmon. If it becomes the decision of the FDA to approve this salmon, it most certainly must be labeled as GE salmon.

As the long-shelved AquaBounty transgenic salmon is the first genetically engineered (GE) animal intended for human consumption, the importance of thorough human health studies and consumer opinion cannot be understated. This animal should not be approved for human consumption until and unless further study, including a full environmental impact statement, indicates that they are safe for consumers, wild salmon populations and for the environment.

In particular, we are concerned about the potential human health impacts of eating GE fish. Transgenic fish may be susceptible to more diseases than fish currently grown in aquaculture facilities because transgenic fish are identified as "macro-mutants" with a reduced ability to survive. Consequently, the amount of antibiotics given to this type of fish may be significantly higher than the amount currently given to farmed fish which are given more antibiotics than any other livestock by weight.

Out of deep concern for the integrity of God's creation, we are deeply concerned about the risks that genetically engineered fish pose to our marine environment and wild populations of salmon,

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and to the men and women who depend on wild salmon for their livelihoods. FDA approval of GE salmon would present a threat to the survival of native salmon populations, already suffering severe declines from salmon farms and other man-made impacts. With FDA approval, it is possible for GE fish to join the millions of salmon that currently escape into the wild every year delivering a final blow to wild salmon stocks.

Anticipating the stark danger to our ocean environments, and trying to circumvent analyses of those dangers, AquaBounty has claimed that they will only raise their fish in land-based facilities. However, once the production of GE fish becomes commercialized, it will be impossible to control the whereabouts of every single individual and assure compliance with appropriate containment measures. The AquaBounty company also says that it will only produce sterile females; however there is no guaranteed method to produce 100% sterility. The data submitted to the FDA by the company shows that between 1 and 5% of the eggs they produce are not sterile.

Our organization strongly opposes the approval of these genetically engineered salmon and we urge FDA to reject GE salmon. Should FDA decide to approve the AquaAdvantage GE salmon despite overwhelming opposition, clear, mandatory labeling is an absolute must when marketing to fish farmers, fish retailers, food companies, restaurants, and when marketed to consumers to allow consumers to make informed purchasing decisions. Mandatory labeling required by FDA is the only way to protect the public's right to know about these unprecedented changes to U.S. food.

Thank you for taking our comments under consideration,

Sincerely,

Kathleen McNeely
Faith Economy Ecology Program Coordinator
Washington, DC