



Sitka Conservation Society
Box 6533
Sitka, Alaska 99835
(907) 747-7509
info@sitkawild.org
www.sitkawild.org

“Protecting the natural environment of the Tongass while supporting the development of sustainable communities in Southeast Alaska – since 1967.”

January 8, 2013

Re: Comment on Docket No. FDA-2011-N-0899 (Genetically Engineered Salmon)

To Whom It May Concern:

In Sitka, Alaska, our culture and economy are dependent on wild salmon. That is why we are horrified by the FDA’s draft environmental assessment and preliminary finding of no significant impact concerning AquaBounty’s proposal for genetically engineered Atlantic salmon.

The fact is the impact of genetically engineered salmon may not only be significant but may undo decades of work to protect and rebuild our wild salmon stocks in Southeast Alaska and our commercial salmon fisheries.

The sole purpose of genetically modifying Atlantic salmon is to increase profits for salmon fish farms by creating, stronger, larger, and faster growing fish. It does nothing, however, to eliminate the problems that have caused the Alaska state government to ban salmon fish farms in the state. These farms pollute water with concentrated fish waste and feed, spread Sea-lice, and ultimately lead to escapement and interbreeding. If genetically modified salmon are permitted, it will be only a matter of time before they are muddling the pure wild population in Alaska. We have already seen escaped farmed Atlantic Salmon in our local waters that have escaped from Fish Farms in British Columbia and are mixing with our wild stocks. These fish can escape, and do. The consequences of an escape of a genetically modified fish could be disastrous.

Although it could be years before the escapement of genetically modified salmon impacts wild Alaskan salmon, we expect an immediate economic impact that will not only hurt our communities but the wild stocks themselves. Consumers prefer wild salmon, but the wider the price differential between wild and farmed, the greater the likelihood a consumer picks farmed salmon. Genetically engineered salmon will expand the price differential, harm our local fishermen, and possibly even reduce the political and economic will to maintain the ecological health of our wild stocks.

Genetically modified farmed fish are moving us away from a sustainable food system. Natural ecosystems have taken hundreds of thousands of years to evolve. Wild Salmon contain in their own wild genetics the ability to adapt and respond to changes in the environment. This “in-breed resiliency” has created a food source that has sustained people of the West Coast for

tens-of-thousands of years. Even more, before their populations were wiped out by human activity in the Northeast and in Britain and Ireland, humans depended on salmon for a huge amount of protein. This proposal to genetically modify salmon and raise them in an artificial environment ignores the inevitable laws-of-nature and the natural evolution of the species. If we allow this initiative to move forward, we are making a grave mistake.

We disagree with the FDA's draft EA and preliminary FONSI, and we absolutely oppose any proposal for the introduction of genetically engineered salmon.

Thank you for this opportunity to comment,

Andrew Thoms
Executive Director
Sitka Conservation Society

PS: attached are letters from Americans across the nation who are opposed to GMO salmon that have been shared with us.