



September 16, 2010

Center for Veterinary Medicine (HFV3)
Food and Drug Administration
7519 Standish Place
Rockville, MD 20855

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

RE: **Docket No. FDA-2010-N-0001 and Docket No. FDA-2010-N-0385**, VMAC Meeting on approval of AquAdvantage genetically engineered salmon; Labeling of AquAdvantage genetically engineered salmon

The undersigned members of the food industry, including over 200 chefs, restaurants, grocers, distributors and food companies, urge the Food and Drug Administration (FDA) *not to approve genetically engineered (GE), AquAdvantage salmon for commercial use.*

This transgenic salmon is the first GE animal intended for food, yet the human health impacts of eating these GE fish are completely unknown. These GE fish also pose unacceptable risks to wild salmon and the marine environment. GE salmon must not be approved until and unless further study indicates that it is safe for consumers, native salmon populations, and the environment. Additionally, we are alarmed that the FDA may not require labeling of GE salmon should it be approved. Mandatory labeling is the only way to protect the public's right to know about these unprecedented and material changes to our food.

As food providers, we are the first line of defense for consumers. We are expected to provide the highest quality food possible, and to respond to consumers' desires. *In sum, we advocate sustainable, safe, and nutritious food and therefore have no desire to purchase, sell, or serve GE salmon.*

Greater Use of Antibiotics

Some of our concerns include the potential toxicity, allergenic effects, and diseases posed by the commercialization of transgenic fish. While data on human health impacts of GE fish is sparse, especially because the FDA has yet to share the data it has reviewed, there is cause for serious concern. For example, the routine use of antibiotics to control

diseases often found in farm-raised fish can impact human health. Some research suggests that transgenic fish may be susceptible to more diseases than fish currently grown in aquaculture facilities¹. Consequently, the amount of antibiotics given to transgenic fish may be higher than the amount currently given to farmed fish. Already farmed salmon are given more antibiotics by weight than any other livestock. Eating farmed fish treated with antibiotics could be harmful to humans. Indeed, some antibiotics are toxic and can even cause fatal allergic reactions².

Additionally, the use of antibiotics in aquaculture also exacerbates the significant problem of antibiotic resistance in humans (as well as animals). The potential human health concerns connected with the use of antibiotics in aquaculture, including the unique role transgenic fish may play in exacerbating such use, must be fully assessed by the FDA.

Effects on Wild Salmon Population

We are also concerned that GE fish pose serious risks to wild populations of fish, and to consumers who rely on them for healthy nutrition. Each year millions of farmed salmon escape from net pens and outcompete wild populations for resources and straining ecosystems. Even in land-based facilities salmon have the ability to escape and will be virtually impossible to recover. We believe any approval of GE salmon would represent a serious threat to the survival of native salmon populations, many of which have already suffered severe declines related to salmon farms and other man-made impacts.

Escaped GE salmon can pose an additional threat – genetic pollution resulting from what scientists call the “Trojan gene” effect. Research published in the *Proceedings of the National Academy of Sciences* notes that a release of only 60 GE fish into a wild population of 60,000 would lead to the extinction of the wild population in less than 40 fish generations.

Labeling Issue

As already noted, we are greatly concerned that the FDA may not require the labeling of GE salmon if it is approved for the consumer market. It is totally unacceptable for GE fish not to be labeled if approved for commercial use. Our customers tell us that sustainable, safe seafood is of utmost importance to them and in order for us to maintain our professional and personal integrity, it is vital that we have full information on foods that we sell and/or serve. Should the FDA approve GE salmon despite our strong opposition, we unequivocally demand that such fish be labeled.

We know there is a great appetite for salmon, but the solution is not to “farm” GE versions; *the solution is to work to bring our wild salmon populations back.*

¹ William Muir et al., Possible ecological risks of transgenic organism release when transgenes affect mating success: Sexual selection and the Trojan gene hypothesis, 96 PNAS 13853-13856, at 13853 (Nov. 23, 1999).

² Rebecca Goldberg and Tracy Triplett. *Murky Waters: The Environmental Effects of Aquaculture in the U.S.* (p 44). Environmental Defense Fund (1997).

We strongly oppose FDA approval of GE salmon. Should FDA decide to approve the AquAdvantage GE salmon despite overwhelming consumer opposition and potential threats to the environment, human health, and native salmon populations, we urge that clear, mandatory labeling be unconditional.

Signed:

Food Companies, Grocers, Retailers & Distributors

Robynn	Shrader, CEO	National Cooperative Grocers Association
Anne	Mossness	Fishers Choice Wild Salmon and Gifts
Michael	Potter	Eden Foods, Inc
Claudia	Reid	California Certified Organic Farmers
Thomas	Newmark	New Chapter, Inc.
Russel	Ruderman	Island Naturals Market
Michael	Funk	United Natural Foods, Inc.
Kim	Davidson	Davidson Commodities, Inc.
Jeff	Wright	Wright's Nutrients
Jon	Allor	Heartland Marketing and Sales
Eli	Penberthy	PCC Natural Markets
Laura	Anhalt	A Taste of the World
Julia	Khodabandeh	Bainbridge Graduate Institute
James	Howard	CGC
Alida	Cantor	Chefs Collaborative
Annaliese	DeNooyer	Commonplace Coffee
Erin	Rice	Contract Foodservice
Kim	Rush Lynch	Cultivating Health
Alex	Corcoran	Edible Seattle
Kay	Pratt	Fabulous Foods
Sherri	Vinton	Farm Friendly LLC
Marsha	Weiner	Food Muse Media
Betty	Fussell	Fussell's figs
Elizabeth	Robinette	Lazy R Ranch
Susan	Hughes	Marketing consultant
Sue	McGovern	McGovern Communications,
Helen	Brody	New Hampshire Farms Network
Lulu	Cohen-Farnell	Real Food for Real Kids
Catherine	Mardosa	Red Planet Vegetables
Michelle	Perry	Restaurant Associates
Deborah	Di Bernardo	Roast House LLC
Judith	Kirkhuff	Seattle Farmers Market Association
		Sustainable Food Educator - Community
Jennifer	Hall	Building, LLC
Leah	Hadfield	The Essential Baking Co.

Catie	Baron
Anna	Li
Michael	Sentkewitz
Jake	Greenberg
J.	Huston
Patricia	Scallan
Jason	Sull
David	Joachim
Charlie	Schaffer
Patricia	Gadsby
James	Nadeau
Robert	Young
Jennifer	Girvin
Mary	Doyle
Addison	Fischer
George	Brereton
Daniel	Woodham
Kelii	Kotubetey
Christopher	Fritz
Jody	Crowe
Sophie	Belanger
Richard	Belanger
Christine	Toner
David	Greenberg
Catherine	Wissner
David	Warner
Peter	de Garmo

The Essential Baking Company
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The Essential baking company
Classic Foods, Ltd
Farm to Table Food Services
Guckenheimer
Guckenheimer - Operations
Joachim Ltd Chef Salt
Schaffer's Genuine Foods
Falmouth farmers' market
Hy-Vee
Whole Foods Markets Artisan Master Butcher
Chandler Company
Community Food Co-op
Food and Thought, owner organic retail
grocer
Gifts of the Planet Farm
Goat Lady CSA
Heeia Fishpond
Restaurant Associates, a division of Compass
Group
Retail for Local Foods
Solstice Whole Foods and Herbs
Spirit of Opulence Farm
Stonington design+paperie
Success by design
Wild Winds Sheep Company
City Feed and Supply
Pastaworks

Chefs and Restaurants

Janis	McLean
Mike	Whitesides
Matthew	Coyle
Carrie	Balkcom
Bryan	Grund
Barbara	Barton
Daryl	Burchfield
Judith	Klinger
Victoria	LaPlante
Amy	Bodiker
Michael	Delcambre
Kyle	McCleary

15ria
Affairs To Remember
Alpine Grove
American Grassfed Association
ARAMARK
Argus
ARK Community Charter School
Aroma Cucina
Babe's Beanery
Bodiker Consulting, LLC
Bon Appetit Management Company
Bon Appetit Management Company @
Macalester College

Liana	Robberecht	Calgary Petroleum Club
Lina	Romasanta	California Culinary Academy Le Cordon Bleu
Alison	Costello	Capuchin Soup Kitchen
Richard	Grausman	Careers through Culinary Arts Program
Christopher	Harley	Cascadian Square LLC
Stephen	Sheer	CHEFFLEX
Jennifer	Ede	Chefs Collaborative
Tselani	Richmond	Chez Tse
Pascal	Dionot	Classic Cooking Academy
Paul	D'Avino	Cochon Restaurant, Brigtsen's Restaurant (both New Orleans, LA), New England Culinary Institute (Montpelier, VT)
Tom	Cohen	Culinary Revolution Catering
Bernardo	Coelho	Compass Group
Keith	Fournier	Compass Group
Robert	Willis	Consulting chef
Julia	dellaCroce	Consulting chef
Kris	Jakob	Culinary Institute LeNôtre
Susan	Ciriello	Culinary Instructor/Art Institute of Washington
Christa	Glennie Seychew	Currently working as a food editor
Erika	Zetty	Custom Cuisine by Erika LLC
Roland	Henin	Delaware North Companies
Sharon	Worster	EZChef.net
Jake	Francis	Farm 255
Jennifer	Armentrout	Fine Cooking Magazine
Douglas	Katz	Fire Food & Drink
Michell	Bretall	Fire & Knives Organic Caterer & Personal Chef
Don	Splain	Fischer int.
Sarah	Splain	Food and Thought
Barbara Ann	McMonigal	Food Family Farming Foundation
Thomas James	Robinson	Food service technician at St. Clair County Community Health Authority
Patrick	Havard	Four Seasons Hotel Company
Charis	Rose	Goat Lady Dairy Dinners
Peter	Marrello	Great Performances/ Sotheby's
David	Drapes	Guckenheimer
Jeremy	Mayer	Guckenheimer
Amanda	Moore	Guckenheimer
Shane	Neal	Guckenheimer Enterprises INC.
Jennifer	Hancox	Hancox Restaurant Training
Esther	Bernstein	Heavenly Rest Stop Oui Cater Inc.
Ilene	ross	Hot Food! Catering

Donal Brandon	O' Rourke Thomas	Hudson Grille Lumiere Restaurant in West Newton, MA
john	stanley	Illinois Institute of Art - Chicago Culinary Department IMAGINATION
Janet Caroline	Reynolds Lewis	In Good Taste cooking school, Portland, OR
Erin Renee	Coopey Marton	In Good Taste Pairings Institute of Culinary Education Chef Instructor/ Food Writer
April Rob Christopher Allen	Powell Mayerat Agnew Edwards	InviteAvitE Irish Times Islandwood:A school in the woods Ivy Tech Community College, Indianapolis, IN
Charlotte Nicole Clinton Vicki	Song Stemler Moorehead Hyndman	Joli Kobe Bakery & Cafe Julius Meinl Lake Limerick Country Club Le Cordon Bleu College of Culinary Arts
Jeremiah	Cone	Le Cordon Bleu College of Culinary Arts Los Angeles
Emily	Moore	Le Cordon Bleu College of Culinary Arts, Seattle WA
Wendy	Roskin	Le Cordon Bleu College of Culinary Arts-LA
Amanda Ian Bryan Michael Virginia Lauren Catherine Richard	Levine Troxler Szeliga Leviton Thiell McCabe Lucas Hetzler	le Cordon Bleu student Lone Mountain Ranch Lucy's Table Lumiere Marcum Conference Center MealThymes Mere Catherine Cuisine Mitsitam Native Foods Cafe/ Restaurant Associates
Laura	Lee	Napa Valley Cooking School Chef Instructor
Robin Nicole Robert Sharon Vitaly Paul Christopher Phoebe	Asbell Aloni Parks Montoya-Welsh Paley Psathas Wegwart Cole-Smith	Natural Food Chef Nicole Aloni oci Oyster Cookery Paley's Place Bistro and Bar Personal Chef Personal Chef PICNIC

Carrie	Christensen	Private Chef
Traca	Savadogo	Private chef.
Ivan	Kyutukchiev	Raymonds restaurant, St.John's
Justin	Dean	Relish Restaurant Group: The Bistro, Local 127, Lavomatic, Chalk Food+Wine, Greenup Cafe, Grammers. Cincinnati Ohio/Northern KY
Bruce	Barnes	Restaurant Associates
Michael	Dekker	Rouge Restaurant Calgary, Alberta
Elizabeth	Howes	Saffron Lane
Kathleen	de Chadenedes	s'Cool Food Initiative
Kathy	Bilodeau	self employed on call chef
Timothy	Duque	Starwood Hotels
Jamey	Tochtrop	Stellina Pasta Cafe
Gary	Caron	Stripers Waterside Restaurant Kennebunkport, ME
John	Foster	Sullivan University
Susan	Lane	Susan A. Lane Events and Catering Co.
Suzanne	Scalfaro	Suzanne Scalfaro, Chef LLC
John	DiLeo	Tanuki Tavern
Jeff	Rossmann	Terra Restaurant & Catering
Judith	Basso	The Bull Run Restaurant Shirley, MA
Joanne	Dyck	the Learning Kitchen
Amy	Cotler	The Locavore Way
Gigia	Kolouch	The Natural Pantry
Joe	George	The Twentieth Century Club
David	Hackett	The Westin Diplomat Golf Resort and Spa
Andrew	Porte	The Westin Tabor Center Hotel
Maria	Hines	Tilth
Richard	Reiter	Toppers/Kingson NY (now closed)
Michael	Miller	Toques
Twillia	Glover	Twillia Glover Catering
Susan	OKeefe	University food service
Rick	White	Whole Foods Market
Andrew	Laughlin	Zocca
Natalie	Sellers	4th St Bistro, Reno, NV
Christy	Perez	Alaska Marine highway Ferry
Deborah	Scarborough	Black Cat Bistro
Casey	Morell	CafeZorro
David	Drew	Cambridge Brewing Company
David	Pow	Chef Geoff's
Seth	Caswell	emmer&rye
Rick	Bayless	Frontera Grill, Topolobampo & XOCO
Tim	Olmstead	Guckenheimer

Brian Lucia	Keefe Watson	Guckenheimer Enterprises, Inc. Lucia's Restaurant, chef owner Lucia Watson
Brian Nancy Lisa	Hutchins Lazarus Schroeder	Luna Restaurant and Bouzies bakery Moosewood Restaurant Mother's Bistro & Bar Mama Mia Trattoria
Bruce Michael Kim Jose Paul Peter	Sherman Ainslie Muller Diaz Rogalski Hoffman	North Pond Restaurant, Chicago Pitfire Artisan Pizza Real Food Nation Restaurant Associates Rouge Restaurant Savoy restaurant, Back Forty Restaurant
Holly	Smith	Somerset Ventures dba Cafe Juanita and Poco Carretto Gelato
Mary Michael	Cleaver Hirst	The Cleaver Co The Green Table Willow Ridge Golf Club Iowa Central Community College
Toy	Dupree	Amy's Bread - 3 retail bakery cafe's in Manhattan.
Micah Craig Michelle Diane Jess Jennifer Joel Jo Christina	Cavolo Sewell LeBleu LaVonne Kriss McCombie Blice Kumery Curtin	Bon Appetit Managment Company A Cook's Cafe, Annapolis, Maryland FM 2711 Diane's Market Kitchen Blackstone Caterers Bon Appetite Catering Chauncey Conference Center Guckenheimer Guckenheimer Enterprises Incorporated, Flix Cafe Guckenheimer Studio Plaza Cafe Guckenheimer, LIberty Cafe
Lorin Donna Kostantinos Diane	Stein Webster Kontogiannis Elliot	Local roots restaurant Roanoke VA Local Roots: A Farm to Table Restaurant,. Roanoke, VA
Melina Jessica Fritzi	Packer Blaine Cohen	M&She Marche, LLC Moby Dick Hotel and Oysterfarm, and Hotel Tabard Inn.
Patti	Miller	Panorama at the Peak - Dining with a View
Cynthia Jeffrey Robert	Walter Holland Wolosin	Passionfish (Owner) Sheraton Denver downtown hotel The Turtle, Brownwood, TX Bar Manager

Helen

Cameron

**Uncommon Ground (2 restaurants in
Chicago)**

** Some companies or restaurants may be listed for identification purposes only*