



**CITY OF PETERSBURG**  
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2010 OCT 12 A 6:19

To: U.S. Food & Drug Administration

Date: October 11, 2010

RE: Food and Drug Administration  
Docket No. FDA-2010-N-0385

Fax: 301-827-6870

Please find attached the City of Petersburg, Alaska's Resolution #1952 opposing AquaBounty Technology, Inc.'s application to market genetically engineered Atlantic salmon in the United States. Please file this resolution along with other comments received regarding the "AquaAdvantage Salmon".

If you have any questions, please feel free to contact me at (907) 772-4425, ext. 21 or by email at [depclerk@ci.petersburg.ak.us](mailto:depclerk@ci.petersburg.ak.us).

Thank you,

Debra K. Thompson  
Deputy City Clerk

FDA-2010-N-0385

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**RESOLUTION #1952****A RESOLUTION OPPOSING AN APPLICATION FROM AQUABOUTY TECHNOLOGIES, INC. TO THE U.S. FOOD AND DRUG ADMINISTRATION (FDA) TO APPROVE AND MARKET GENETICALLY ENGINEERED ATLANTIC SALMON IN THE UNITED STATES**

WHEREAS, AquaBounty Technologies, Inc. has submitted an application to the FDA for approval of the "AquAdvantage Salmon", a genetically engineered Atlantic salmon, for human consumption and marketing in the United States; and

WHEREAS, this is the **first** genetically engineered animal intended to be used as food in the United States; and

WHEREAS, the "AquAdvantage Salmon" was bred by inserting a recombinant DNA construct (also called a transgene) comprised of a Pacific Chinook salmon growth hormone gene and an Ocean Pout antifreeze protein gene into fertilized eggs of wild Atlantic salmon. The breeding of six subsequent generations led to an "AquAdvantage Salmon" line which bears a single copy of the integrated transgene. The broodstock used in spawning of "AquAdvantage Salmon" are females containing two copies of the transgene that have been scientifically sex-reversed for breeding purposes, therefore labeled neomales. The neomales are crossed with female Atlantic salmon that do not possess the transgene to produce eggs containing a single copy of the transgene. The fish that develop from these eggs have an enhanced growth rate compared to non-transgenic Atlantic salmon; and

WHEREAS, AquaBounty proposes fertilization and incubation to the eyed-egg stage on Prince Edward Island, Canada; shipment of the eyed-eggs to Panama; grow-out and processing of fish in Panama; and, shipment of processed fish to the United States for retail sale. While AquaBounty maintains the land based rearing of the "AquAdvantage Salmon" to be safely contained with a minimum risk of escapement into the wild; and, in the event there is an escape, believes the geographical area of the salmon rearing is unfavorable to the survival of "AquAdvantage Salmon", Alaskans know all too well that fish farming containment measures are not fail-safe. In addition, AquaBounty does not address the possibility of eyed-eggs making their way into the streams that run into the Northern Atlantic Ocean; and

WHEREAS, Petersburg City Council urges you to honor the Food and Drug Administration Amendments Act of 2007 provision (P.L. 110-85) requiring the FDA Commissioner "to consult with the Assistant Administrator of the National Marine Fisheries Service 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"; and

WHEREAS, the development of "AquAdvantage Salmon" has been ongoing for approximately 15 years, yet the product has not been the subject of thorough scientific research and testing to ensure its consumption is safe in the long term; and

WHEREAS, many salmon consumers purchase the product for its widely recognized health benefits, this lack of safe consumption testing could weaken consumer confidence in all salmon products; and

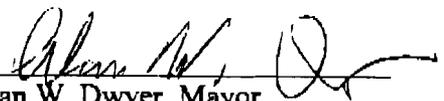
WHEREAS, Alaska's wild seafood industry, which is extremely important to the state's economy and is the largest industry in Petersburg, could be severely impacted by the sale of genetically engineered salmon if proper labeling is not required. Should the FDA approve AquaBounty's application to market their product in the United States, it is critical that the product be mandated to be clearly labeled "Genetically Modified" to allow consumers to make an informed choice. Alaska statutes require such labels be prominently displayed on the front of the package.

THEREFORE BE IT RESOLVED THAT the City Council of the City of Petersburg by this resolution does not support approval of genetically engineered salmon for sale in the United States.

BE IT FURTHER RESOLVED THAT if despite strong environmental and human health concerns the application is approved by the FDA, product labeling requirements should include the words "Genetically Modified" prominently displayed in a minimum font size and a contrasting color on the front of the package.

PASSED and APPROVED by the City Council of the City of Petersburg, Alaska this 4th day of October, 2010.

  
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Kathy O'Rear, City Clerk

  
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Alan W. Dwyer, Mayor