



November 17, 2010

National Cooperative Grocers Association  
14 S. Linn St  
Iowa City, IA 52240

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

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

To Whom It May Concern:

The following comments are submitted on behalf of the National Cooperative Grocers Association in response to the FDA Docket No. FDA-2010-N-0385. We thank FDA for the opportunity to submit comments on this topic and we appreciate their inclusion of our comments in their final rule decision making regarding GE AquAdvantage salmon.

Introduction

The National Cooperative Grocers Association (NCGA) is a cooperative owned by 114 consumer-owned retail food co-ops operating over 145 stores in 32 states. The group's total annual sales are in excess of \$1.2 billion, with the member co-ops ranging from under \$1 million in annual sales to over \$100 million. As an organization, NCGA is committed to providing the vision, leadership and systems to catapult a virtual chain of thriving retail food co-ops to a position of prominence in the natural foods industry. Our member stores work every day to support local farmers and food systems while placing a high priority on sustainability, environmental stewardship, health and nutrition. NCGA works closely with organic and conventional farmers and has a consumer member base concerned about food and agriculture issues including genetic engineering.

We have a number of concerns with the proposed deregulation of AquAdvantage (AA) Salmon. Our concerns include animal health and welfare; nutritional quality; micro and macro environmental effects; and finally consumer choice. Most of these concerns are exacerbated by the small sample sizes used by AquaBounty to provide data on these topics.

Animal Health and Welfare

**NATIONAL COOPERATIVE GROCERS ASSOCIATION  
14 S. LINN ST., IOWA CITY, IA 52240  
PHONE: 319.466.9029**

Co-op shoppers are interested in fresh, healthy and nutritious food. AquaBounty's own data suggests that AA salmon is predisposed to physical ailments. Specifically, AquaBounty's data shows jaw erosion (ibid, 40) and increased presence of inflammation (ibid, 41) in various tissues of AA salmon. Any combination of genes occurring in the natural evolution of salmon that caused erosion of the jaw would have been an impediment to its immediate survival and long-term prospects for reproduction. Such a trait would have been selected against in nature if it hadn't killed the animal before maturity. Furthermore, the data showing tissue inflammation points to greater systemic problems such as immuno-deficiencies. In response to these abnormalities the FDA complained that the sample size is too small but excuses AquaBounty from further research. These issues should not be ignored and instead be cause for further study prior to deregulation. In any case, either trait alone illustrates an unhealthy animal and is a clear barrier to fresh and healthy food.

No one chooses to put sick animals on the dinner plate given the option of a healthy animal. It's counterintuitive to the notion of choosing to eat healthy food. Healthy food is not just food which is good for the consumer's health but also, in the case of animals, food which has lived a healthy life. Why would we choose to raise an animal for food that is systemically unhealthy? It's a waste of effort and resources and simply unnecessary.

#### Nutritional Quality

Eating provides us with nutrients we need to survive and thrive. There are vital nutrients such as omega3/omega 6 essential fatty acids which easily derived from salmon. Again, AquaBounty's own data suggests their product is inferior to even the farmed salmon currently on the market with respect to a number of nutrients (ibid, 95). Given that farmed salmon is itself inferior to wild salmon with respect to nutrient content, using farmed salmon as the baseline sets a low bar.

Farmed salmon is not the gold standard for nutrition nor is it even the silver standard and yet AA salmon fails to meet this low bar for nutritional value.

#### Micro and Macro Environmental Effects

AA salmon poses a major threat to both the micro and macro environment. In the case of an ocean-going fish, the micro-environment of local salmon populations are sure to be directly and immediately threatened by AA salmon. Fish regularly escape from pens and ponds. Even if it could be absolutely guaranteed that AA salmon would never be raised in net pens, ponds do not insure that it would not make its way to the wild. Asian carp kept in catfish ponds in the southern United States now threaten the Great Lakes and the northern reaches of the Mississippi watershed all because of a 500-year flood. Who would have predicted it? Is sacrificing the entire Mississippi River watershed and potentially the Great Lakes worth the benefit provided by this invasive species? In retrospect, these carp probably wouldn't have been allowed in the country if we had thought of it in those terms decades ago.

Once established in the wild, these salmon will unquestionably contaminate wild populations. Tagged Atlantic salmon from the Northeastern US have been caught in

Greenland. Will escaped salmon from Prince Edward Island find their way to New England and contaminate US wild Atlantic salmon? The answer is a resounding “Yes.”

There has been absolutely no evidence presented that the current modifications to AA salmon's genome will prevent escape, limit the distance it can migrate during its lifetime, or prevent it from swimming south. Based on the assertion that there is no material difference between this fish and other species of salmon and that the natural range of salmon includes the state of Maine, the only logical conclusion is that this fish will be make its way to U.S. waters and threaten wild salmon populations.

#### Labeling and Consumer Choice

As consumers and retailers who are focused on making informed food choices we would like to focus on one right that should be inalienable: the consumer's right to choose. Consumers should always have the right choose what they put on the dinner table. If this fish is brought to market, millions of people will be potential consumers and each one of them deserves the right to make informed choices regarding their food. Labeling will be the key to allowing choice: for those who choose to purchase this fish as well as those who choose to avoid this fish.

Consumer choice necessitates labeling, it is not optional. Consumers have a right to know what is in their food and choose whether or not to eat certain foods. Despite the myriad of issues we see with this fish, the one issue that consumers cannot be rightfully denied is the right to choose. AA salmon must absolutely be labeled in the marketplace.

Sincerely,

A handwritten signature in black ink that reads "Robynn Shrader". The signature is fluid and cursive, with the first name being more prominent.

Robynn Shrader  
Chief Executive Officer  
National Cooperative Grocers Association