



National Organic Coalition

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November 19, 2010

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

NOC MEMBERS

Beyond Pesticides

Center for Food Safety

Equal Exchange

Food & Water Watch

Maine Organic Farmers and Gardeners Association

Midwest Organic and Sustainable Education Services

National Cooperative Grocers Association

Northeast Organic Dairy Producers Alliance

Northeast Organic Farming Association - Interstate Council

Organically Grown Company

Rural Advancement Foundation International -USA

Union of Concerned Scientists

RE: Docket No. FDA-2010-N-0385

Labeling of AquaAdvantage genetically engineered salmon

Food and Drug Administration:

The National Organic Coalition, (NOC) is a national alliance of organizations representing farmers, environmentalists, other organic industry members, and consumers concerned about the integrity of national organic standards. The goal of the coalition is to assure that organic integrity is maintained, that consumers' confidence is preserved and that policies are fair, equitable and encourage diversity of participation and access.

NOC is writing to express our opposition to the approval of Aquabounty's genetically engineered (GE) salmon, and to urge FDA to require the labeling of GE salmon should it be approved despite the demonstrated risks and intensive public opposition.

Although required to do so under the Endangered Species Act, the FDA has failed to consult other U.S. agencies on this issue. Recent comments from U.S. Fish and Wildlife Service scientists (as well as experts around the world), indicate serious doubt regarding the research the FDA has cited to support the approval of what would be the first genetically engineered animal for human consumption.

Because AquaBounty transgenic salmon is the first GE animal intended for human consumption, it is absolutely imperative that the FDA require independent, thorough, and longitudinal human health studies. It is imperative that the Agency closely evaluate the particular health risks to the allergy-prone, immune compromised, and children, because they require careful evaluation of the foods they eat. The importance of consumer opposition to GE salmon cannot be understated. Public confidence in FDA's ability to carefully oversee and regulate food and drug safety hinges on the public's perception of the Agency's efforts to seriously address the scientific and public concerns raised during this public comment period.

The National Organic Coalition calls upon the FDA to conduct a full environmental impact statement on GE salmon to closely evaluate its safety for human consumption, the potential impacts on wild salmon populations and marine ecosystems, and the economic impacts on the existing salmon fishing industry. Even though no fish have been certified organic in the US, organic consumers want to know if the foods they consume are GE.

And, because there are no certified organic fish on the market, the only way organic consumers can know whether a farmed fish is non-GE is for GE fish to be labeled.

If FDA moves forward in approving AquaBounty GE Salmon, which we believe would be an irresponsible decision at this time, the National Organic Coalition calls upon the FDA to require labeling to protect the right for consumers to make informed choices food production systems, and the quality and safety of the food they eat.

Thank you for your consideration,

A handwritten signature in black ink that reads "Liana Hoodes". The signature is written in a cursive, flowing style.

Liana Hoodes, Director