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Monday, September 13, 2010

**RE: FDA Hearing on GE Salmon – organizational letter in Opposition to Application  
re Docket No. FDA-2010-N-0001: Kinship Selection Risks Too High**

Dear Heather:

You may include the Groundswell Fisheries Movement (of Alaska) in your list of organizations opposing the FDA approval of genetically engineered AquAdvantage Salmon. Our major concern – first expressed while a panelist at WTO Seattle 1999 in a NGO event on Sustainable Fisheries – is that of the risks to wild salmon inherent in the biological imperative of species for Kinship Selection. **Introducing species of greater size, ability or strength – whether deliberately or by ‘accidental’ escapement from net cage farms – determines who wins in the reproductive game of life itself.**

We believe that the escape of both farmed and GE salmon species into the ocean ecosystem (and thus into spawning waters) will (1) inevitably lead to these non-natural salmon outcompeting wild stocks in the quest for use of the reproduction habitat, and as currently understood will (2) through species interaction also pose a grave risk to modifying natural stocks’ genetics.

**The decision to allow genetically altered animals is premature science.** This decision has ominous implications for the allowance of other GE modified animals – a risk so serious that its quantification defies current knowledge. Even for fish allegedly contained in Panama facilities, if introduced into the ocean, GE salmon will seek particular temperature zones and otherwise migrate to mix with natural stocks. The ocean contains no fences to prevent this scenario.

**The decision to allow GE salmon, let alone other aquaculture, is also linked to the Conduct of Trade and the exploitation of cross-border tax evasion strategies by the global corporations who will market fish in one nation and leave the exteriorized social and ecosystem costs for producing nations to bear.**

Groundswell has addressed the issues of such Abusive Transfer Pricing at NOAA Fisheries Aquaculture hearings, and it is even more difficult to deal with this sovereignty (and tax) issue for GE stocks. **Nations who are harmed by GE stocks, either during production or by escapement effects, will not be able to readily obtain remedy for those harms in world courts, especially as revenues are hidden in final market countries or within a network of ‘offshore’ corporations designed to launder profits via the products to avoid national taxes where profits actually occur.**

Please include us in your list of organizations opposing FDA approval of GE salmon. You may use this letter as appropriate to this goal. Thank you for all your efforts.

Sincerely,

Stephen Taufen, Groundswell Fisheries Movement

Website: <http://groundswellalaska.com>