

Critique of Genetically Engineered Salmon

By Paige Spence and Tessa Berman

NEDC's Sustainable Agriculture Group recently commented on the Food and Drug Administration's analysis under NEPA regarding AquaBounty's genetically-engineered salmon. These comments follow up on comments the group submitted in 2010 regarding food labeling requirements for the same product.

In November of 2010, NEDC's Sustainable Agriculture Group commented on labeling requirements for food made from AquAdvantage salmon, genetically-engineered salmon produced by AquaBounty of Massachusetts. Just over two years later, in December of 2012, the U.S. Food and Drug Administration ("FDA") issued an Environmental Assessment and Finding of No Significant Impact for the transgenic fish, assessing the fast-growing transgenic salmon as safe.



Since this semester began, the Sustainable Ag group has been hard at work drafting a comment on these new documents. After the sixty-day comment period, the FDA may issue a final assessment and approval, at which time AquaBounty can start selling the fish.

The AquAdvantage salmon, if given final FDA approval, will be the first genetically engineered animals sold for human consumption. The salmon eggs would be produced in Canada, transported to the Panamanian highlands to be raised in a hatchery and processed, and then imported to the United States. Given the economic, environmental, and cultural importance of salmon to the Pacific Northwest, the Sustainable Ag group felt a strong need to comment on this proposed federal action.

FDA has relied on the fact that the direct impacts of this action will take place in other countries to justify its cursory analysis of the implications of approval of the transgenic salmon. The Sustainable Ag group's comment argues that the FDA is required under the Endangered Species Act and the National Environmental Policy Act to conduct a more thorough analysis of potential environmental impacts of the fish production. NEDC's Sustainable Ag group maintains that the FDA's own regulations belie the fact that subsequent approvals would be subject to far less scrutiny after the first application is approved. The Sustainable Ag group is requesting that FDA conduct a full Environmental Impact Statement before approving the commercial production of this new species that is likely to have a dramatic effect on the environment.