



Dear CEO,

On behalf of 30 consumer, food safety, fishing, environmental, sustainable agriculture, parent, public health and animal health and welfare organizations, representing millions of supporters, we invite your company to join the **Pledge for Genetically Engineered (GE)-Free Seafood**.

To avoid confusion in the market place, and ensure consumer right to know, we are asking grocery stores, seafood restaurants, chefs and seafood companies to demonstrate their commitment to sustainably produced seafood and consumer choice by joining our **Pledge for GE-Free Seafood**, a commitment to not knowingly purchase or sell genetically engineered salmon or other GE seafood should it come to market. As a top company dedicated to meeting consumer demand for sustainable healthy food, signing the **Pledge for GE-Free Seafood** would be consistent with your company's commitment to sustainability and transparency in seafood sales.

Consumer opposition to genetically engineered animals is high. Polls show that 91 percent of Americans do not want the FDA to allow GE fish and meat into the marketplace,ⁱ the majority of consumers won't eat GE fish if it is available,ⁱⁱ and 95 percent of consumers believe GE food animals should be labeled if the government approves the fish against their wishes.ⁱⁱⁱ

Unfortunately, GE seafood will likely not be labeled as such since the FDA has already said it will not require labeling,^{iv} providing consumers no way of knowing whether the salmon sold at the retail level is genetically engineered. This may lead to market confusion and consumers choosing to avoid salmon entirely.

A growing number of consumers are choosing to purchase sustainable seafood for their families, and according to a 2013 poll, 80 percent of Americans who regularly eat fish say that sustainable practices are "important" or "very important" to them.^v Genetically engineered salmon are not sustainable and threaten the safe, healthy seafood supply that consumers desire.

The U.S. Food & Drug Administration (FDA) is currently in the final stage of review of genetically engineered farmed salmon for human consumption. If approved, this would be the first-ever genetically engineered animal allowed by a regulator to enter the world food supply. At least 35 other species of GE fish are currently under development, including trout, catfish, tilapia, striped bass, flounder, and other salmon species.^{vi} The FDA's decision on this GE salmon application will set a precedent, for its approval will chart a path for other GE fish and animals to enter the market.

This genetically engineered animal will be entering stores without adequate assessment and may pose risks to human health, the environment, endangered fish populations, animal welfare and the sustainable fishing industry. A sustainable seafood market is dependent upon knowing that the fish sold at market are harvested in ways that minimize impact to the environment and wild fish stocks. Since the risks of GE fish have yet to be properly studied, they cannot pass this test and should not be allowed into the marketplace.

To date, nearly 400,000 public comments and joint letters from over 300 environmental, consumer, health, and animal welfare organizations, along with members of Congress, salmon and fishing groups and associations, scientists, food companies, chefs and restaurants, have been sent to the FDA demanding the agency reject this application and require mandatory labeling of this transgenic salmon should it decide to approve it.

Genetically engineered salmon pose numerous human health, environmental, animal welfare, and economic concerns that are of concern to consumers and other stakeholders:

- Unfortunately, the FDA decided these fish will be safe to eat based solely on data provided by the GE salmon company. Of potential concern to human health is the fact that, according to data submitted to FDA, overall all GE salmon have 40 percent higher levels of the hormone called IGF-1 (insulin-like growth factor 1), which may increase the risk of certain cancers^{vii} if absorbed and biologically active in the human body. In addition, the findings on allergy risk were based on only six fish.^{viii} This is bad science and bad food.
- GE seafood will likely not be labeled as such since the FDA has already said it will not require labeling.^{ix} Thus we will have consumer confusion unless companies are clear in their commitment to not sell these products.
- Escaped GE salmon could present significant risk to already imperiled Atlantic salmon populations,^x and escaped fish could bring diseases with them. Infectious Salmon Anemia (ISA), an extremely deadly virus to salmon which devastated salmon farms in Chile and Scotland, was found in the GE salmon egg production facility in 2009^{xi} and was not initially reported to the FDA.^{xii}
- GE salmon are unhealthy and suffer from skeletal deformities, jaw erosions, inflammation, lesions, increased susceptibility to disease, and increased mortality, raising serious animal welfare issues and human health concerns from eating sick fish.^{xiii}
- Economic harm to fishers and fishing communities on both coasts could occur if escaped fish lead to decreases in wild fish populations.^{xiv}

We will promote all companies that join the pledge and make public their policy to not knowingly purchase or sell genetically engineered (GE) salmon or other GE seafood, should it come to market. These companies will be highlighted on our websites, in social media, and in the press, so that consumers can see for themselves where a company stands on GE salmon before they go grocery shopping or dine out.

Please contact Eric Hoffman, Food and Technology Campaigner at Friends of the Earth (gefreeseafood@foe.org or 202-222-0747) so that we may discuss your company's current policies and how your company can show its leadership in corporate sustainability by pledging to not sell genetically engineered salmon or other seafood if approved by the FDA.

Thank you for your attention to this important matter. We look forward to working with your company to ensure GE salmon and other seafood are not sold in the U.S., in order to protect our health, our environment and our wild fisheries, and we hope to be able to highlight your company as an industry leader.

Sincerely,

Erich Pica, President
Friends of the Earth

Kelly Harrell, Executive Director
Alaska Marine Conservation Council

Gretchen DuBeau, Executive and Legal Director
Alliance for Natural Health USA

Sue Leary, President
American Anti-Vivisection Society

Cathy Liss, President
Animal Welfare Institute

Bob Ferris, Executive Director
Cascadia Wildlands

Miyoko Sakashita, Oceans Director
Center for Biological Diversity

Charles Margulis, Sustainable Food Program Director
Center for Environmental Health

Andrew Kimbrell, Executive Director
Center for Food Safety

Chris Waldrop, Director, The Food Policy Institute
Consumer Federation of America

Michael Hansen, Ph.d. Senior Scientist
Consumers Union

Dave Murphy, Executive Director
Food Democracy Now!

Wenonah Hauter, Executive Director
Food & Water Watch

Don Staniford, Director
Global Alliance Against Industrial Aquaculture

Angela Sanfilippo, President
Gloucester fishermen's Wives Association

Anne Mosness, Director
Go Wild Campaign

Alexandra Zissu, Editorial Director
Healthy Child Healthy World

Michael Greger, Director, Public Health & Animal Agriculture
Humane Society of the United States

Pam Runquist, Director, Veterinary Advocacy
Humane Society Veterinary Medical Association

Jim Harkness, President
Institute for Agriculture and Trade Policy

Jeffrey Smith, Founder
Institute for Responsible Technology

Alfredo Quarto, Executive Director
Mangrove Action Project

Ed Barrett, President
Massachusetts Fishermen's Partnership

Kathy Ozer, Executive Director
National Family Farm Coalition

Liana Hoodes, Executive Director
National Organic Coalition

Niaz Dorry, Executive Director
Northwest Atlantic Marine Alliance

Alexis Baden-Mayer, Political Director
Organic Consumers Association

Laurel Hopwood, Chair, Genetic Engineering Action Team
Sierra Club

Malia Nobrega-Olivera, President
Waikiki Hawaiian Civic Club

Elena Edwards, Director
Wild Salmon First

-
- i. Lake Research Partners, Commissioned by Food and Water Watch, 9/20/10. "Americans in near unanimity on their disapproval of genetically engineered fish and meat in the marketplace" <http://www.saynotogmos.org/ud2010/docs/fish_survey.pdf>
 - ii. Consumer Reports National Research Center. CR Poll: Two-thirds of Americans Want FDA to Inspect Domestic, Foreign Food Supply Overwhelming Majority of Consumers Want Country of Origin Labeling Loopholes Closed; GE and Cloned Animals Labeled. http://www.consumersunion.org/pub/core_food_safety/006298.html. Consumers Union, 11 Nov. 2008.
 - iii. Ibid.
 - iv. Background Document: Public Hearing on the Labeling of Food Made from the AquaAdvantage Salmon. Aug. 2010. <<http://www.fda.gov/downloads/Food/LabelingNutrition/FoodLabelingGuidanceRegulatoryInformation/Topic-SpecificLabelingInformation/UCM223913.pdf>>.
 - v. Barclay, Eliza. "Most Americans Eager To Buy Seafood That's 'Sustainable'" National Public Radio, 12 Feb. 2013.
 - vi. Genetically Engineered Fish. Issue brief. Center for Food Safety, Jan. 2013. <<http://www.centerforfoodsafety.org/wp-content/uploads/2013/01/ge-salmon-fact-sheet.pdf>>.
 - vii. Yu H. and T. Rohan. "Role of the Insulin-Like Growth Factor Family in Cancer Development and Progression." *Journal of the National Cancer Institute*, vol. 92, iss. 18. September 20, 2000; and Moschos, S. and C. Mantzoros. "The Role of the IGF System in Cancer: From Basic to Clinical Studies and Clinical Applications." *Oncology*, vol. 63 iss. 4. November 4, 2002.
 - viii. Ibid.
 - ix. Background Document: Public Hearing on the Labeling of Food Made from the AquaAdvantage Salmon.
 - x. Devlin, R. H., Mark D'Andrade, Mitchell Uh, and Carlo A. Biagi. "Population Effects of Growth Hormone Transgenic Coho Salmon Depend on Food Availability and Genotype by Environment Interactions." *Proceedings of the National Academy of Sciences* 101.25 (2004): 9303-308.
 - xi. "AquaAdvantage® Salmon Draft Environmental Assessment." Center for Veterinary Medicine, US Food and Drug Administration. 4 May 2012. Page 43.
 - xii. Entine, John. "Genetically Modified Salmon: AquaAdvantage FDA Assessment Is Delayed Possibly by the White House." *Slate*, 19 Dec. 2012.
 - xiii. "Briefing Packet – AquaAdvantage Salmon," Food and Drug Administration, Center for Veterinary Medicine. 20 September 2010. p. 36-41.
 - xiv. Bottemiller, Helena. "Senators Introduce Bill to Ban GE Salmon." *Food Safety News*, 2 Feb. 2011. Web. <http://www.foodsafetynews.com/2011/02/senators-introduce-bill-to-ban-genetically-engineered-salmon/#.UQ_tlqXAeQI>.