The Honorable Margaret Hamburg, MD
Commissioner
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

RE: Docket No. FDA-2011-N-0899

Dear Commissioner Hamburg,

The State Department emphasizes that agricultural producers must generate as much food in the next 50 years as has been produced throughout all previously recorded history to meet the demands of a rapidly growing global population. To meet domestic and international food security objectives in an environmentally sound and sustainable way and ensure people have plentiful sources of healthy, nutritious food, it is essential that farmers have access to the best technology, including biotechnology, and that governments aggressively support agricultural innovation and science-based regulation.

We support the administration’s emphasis on food security, agricultural production and science-based regulation that are outlined in the National Bioeconomy Blueprint and echoed in the Chicago Council on Global Affairs’ discussion entitled Advancing Food and Nutrition Security. Improving agriculture and access to nutritious food is critical to fighting global hunger and must remain at the forefront of global development.

Because agricultural innovation is so valuable to food security, we are pleased that the Food and Drug Administration recently published its environmental assessment on a salmon application that has been pending within the federal regulatory process for quite some time. According to leading international development and food security expert, Dr. Calestous Juma, in testimony delivered to the House of Representatives in 2011, fish is a sustainable form of meat protein to farm and an important dietary staple for both industrialized and emerging nations of the world. Dr. Juma points out that the role of biotechnology in aquaculture represents “one of the key tools that could enable humanity to expand protein production in a sustainable way.”

The environmental assessment on the salmon application concludes FDA’s thorough science-based review process, which occurred, importantly, with plentiful consultation with other federal agencies. We appreciate the FDA’s statement that a 60-day public comment period should not be extended for the environmental assessment and agree that extending the comment period does not make sense since nearly all of the data pertaining to the application has been in the public realm for more than two years.

Now that the science-review is finished on the salmon application, we look forward to a final decision and to working with the administration on this and other valuable food security initiatives that can only be achieved through strong leadership, global collaboration and utilizing animal and plant science, including biotechnology.

Sincerely,
AACC International
Agricultural Retailers Association
American Association of Avian Pathologists
American Association of Veterinary Laboratory Diagnosticians
American Dairy Science Association
American Farm Bureau Federation
American Feed Industry Association
American Phytopathological Society
American Seed Trade Association
American Society of Animal Science
American Soybean Association
American Veterinary Medical Association
Animal Health Institute
Aquatic Plant Management Society
Biotechnology Industry Organization
Congressional Hunger Center
Federation of Animal Science Societies
National Association of Federal Veterinarians
National Association of Wheat Growers
National Chicken Council
National Corn Growers Association
National Council of Farmer Cooperatives
National Grain and Feed Association
National Milk Producers Federation
National Renderers Association
Poultry Science Association
  U.S. Grains Council
U.S. Wheat Associates