

19 November 2010

Department of Health and Human Services  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
**Docket No. FDA-2010-N-0385**

**RE: Notice of public hearing; Labeling of Food Made From AquAdvantage Salmon, request for comments.**

On behalf of BIOTECanada Agricultural and Nutrition Board Committee (ANAB), I thank the Food and Drug Administration (FDA) Center for Veterinary Medicine (CVM) for convening the Veterinary Medicine Advisory Committee (VMAC) meeting to review the science supporting the new animal drug application (NADA) related to AquAdvantage salmon eggs produced by AquaBounty Technologies and for giving us the opportunity to comment on the labeling of food made from AquAdvantage salmon in the event the NADA is approved.

BIOTECanada ANAB committee represents Canada's leading and emerging agricultural biotechnology companies serving the Canadian market. The goal of the committee is to enable the development and responsible introduction of innovative plant and animal biotechnologies in Canadian agriculture.

BIOTECanada fully supports FDA policy which stipulates the agency will not require labeling of products from GE animals, unless those animal products are materially different from or have significantly altered nutritional composition than conventional products. In short, we do not and will not support mandatory labeling based upon production methods.

There is no mandatory labeling of genetically engineered foods in Canada. There is however a Canadian standard for voluntary labelling of GE foods entitled *Voluntary Labelling and Advertising of Foods that Are and Are Not Products of Genetic Engineering* that was developed to address non-health and safety labelling (independently on whether a food has or has not been produced through genetic engineering).

It is recognized that our success in responding to the growing need for an abundant food supply relies on agricultural biotechnology. As companies develop foods with valuable characteristics such as improved nutritional value, higher growth rates, disease and pest resistance, innovations in animal biotechnology are being looked to as solutions to agricultural and human health problems.

Sincerely,



Peter Brenders  
President & CEO



Philip Schwab, Ph.D  
Vice President, Industry Relations