AQUADVANTAGE® SALMON'S JOURNEY TO MARKET: STILL MAKING HISTORY

Making History is what AquaBounty Technologies has been doing ever since it was created in 1991. Originally named AF Protein (for antifreeze protein, the original focus of research), the Company was created to commercialize a fast-growing Atlantic salmon.

By Dave Conley*

his salmon, created using recombinant DNA technology by a team of scientists based at Memorial University of Newfoundland, in St. John's, NL, Canada, grows to market cord time, with the added advantage size (4-5 kg) in about 18 months, in- of using 25% less feed. This product stead of the 28-36 months it takes for conventional farmed Atlantic salmon. (AAS). The basis for the rapid growth is the AquAdvantage gene construct. This single growth hormone gene from

Chinook salmon and promoter sequence from ocean pout, when inwas named AquAdvantage® Salmon U.S. Food and Drug Administration

It turns out that the science of creating the AAS was the easy part, taking only three years (1986-89). De-

veloping and commercializing AAS has taken a journey that is now in its tegrated into the Atlantic salmon ge- 29th year! For a start-up, that is an nome, enabled the Atlantic salmon to extremely long time to go without a grow continuously to adult size in re- market presence and a return on in-

> AquaBounty first approached the (FDA) in 1993 to find out what the agency would require for AAS to be approved for human consumption. There was no regulatory pathway at



Interior of R&D Hatchery, Rollo Bay, PEI



R&D Hatchery in Rollo Bay, PEI

the time, and the Company initiated this product definition in hopes it clear pathway for approval of a transresearch which it assumed would be responsive to any eventual requirements. Many years later, but still before any clear regulatory path had been established, AquaBounty decided to create all-female populations of sterile AAS and grow them in landbased aquaculture systems. These all- it was more than 6 years later when female populations are created using the product was finally approved on conventional Atlantic salmon eggs November 19, 2015. In Canada, apfertilized with the milt from sex-re- proval came six months later, on May versed females that carry the AquAd- 19, 2016, when AAS was found to be vantage gene construct. Shortly after safe to consume by people and livefertilization, the eggs are subjected to stock. a pressure shock, which makes them triploid (three sets of chromosomes), approved as a drug? At the time of thus sterile. AquaBounty proposed the application in 1995, there was no

would address concerns over the potential release of AAS to the environ-

when FDA finally established Guidance 187 for the regulation of genetically engineered animals. Still,

Backing up a bit, why was AAS

genic food animal. There were many discussions, stakeholder meetings and other activities intended to identify Progress was slow until 2009, a regulatory pathway, but there was no consensus. Only in 2009, when a pharmaceutical product (Atryn) produced in the milk of a transgenic goat was about to be approved by FDA, did the regulatory pathway for animals crystallize. In Canada, AAS was approved as a novel food. Both FDA and Health Canada processes were based upon the Codex Alimentarius

Guideline for the Conduct of Food Safety

Assessment of Foods Derived from Recom-

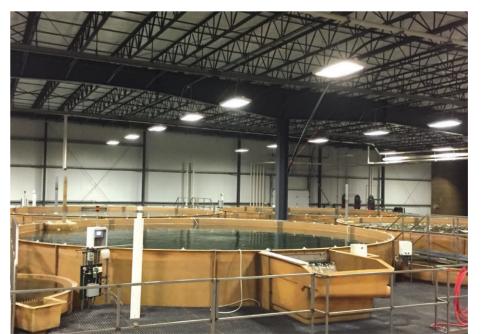
AquaBounty's salmon grows to market size (4-5 kg) in about 18

months, instead of the 28-36

farmed Atlantic salmon

months it takes for conventional

binant-DNA Animals. One would think that with approval from U.S. FDA and Health Canada, the road to commercialization would now be straight-forward. It wasn't. Immediately after the U.S. approval, Senator Murkowski from Alaska, a long-time opponent of AAS, succeeded in having language inserted in the 2016 Omnibus Appropriations Bill that said AAS could not enter commerce until FDA issued labeling guidelines. AAS or any other fish resulting from genetic engineering would require labeling as "genetically modified." Consequently, FDA issued an Import Alert that prevented the Company from importing AAS eggs and fish into the U.S. This was done to comply with the language in the appropriations bill. Since the Company at that time did not have an approved U.S. broodstock or produc-



Grow-out Tanks, Albany, Indiana

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Early Rearing Tanks, Albany, Indiana.

tion facility, eggs or fish would have Both use state-of-the-art recirculating to be imported from either Canada or Panama, where the Company has a small production farm.

pany now has two commercial profarming AAS. One near Albany, Indiana, the site of a former vellow perch producer, has been fully upgraded to

aquaculture system (RAS) technology that recycles more than 95% of the Fast-forward to 2018 and the Com-redundant escape barriers.

country is the last requirement. The approval of the Indiana facility was received from FDA on April 26, 2018. while another in Rollo Bay, PEI, 2016 is still in effect and remains the Canada has been newly constructed last barrier to commercial AAS proto produce 250 metric tons per year. duction in the U.S. It may be that ap-

impasse in the U.S. is resolved. But either way, 2018 will be the year that water and both deploy multiple and AquaBounty Technologies makes history by commencing the large-Approval of the facilities by the scale farming of an innovation that duction facilities ready to commence federal regulatory agencies in each has taken far too long to reach the market. If all goes according to plan, the first commercial harvests in Canada and the U.S. will be in 2020. Unproduce 1200 metric tons per year, However, the Import Alert issued in til then, the limited production from our Panama R&D facility will be sold in Canada where 4.5 metric tons were sold in a test market in June 2017. Feedback from buyers was very positive and tastings at the recent Aquaculture Canada 2018 conference in Quebec City (Quebec, Canada) and the TasteTECH event during the IN-VENTURE\$ conference in Calgary (Alberta, Canada) garnered great reviews. We anticipate consumers will be pleasantly surprised when they have the chance to eat our AquAdvantage Salmon. @

proval in Canada comes before the

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RAS Broodstock Facility, Rollo Bay, PEI

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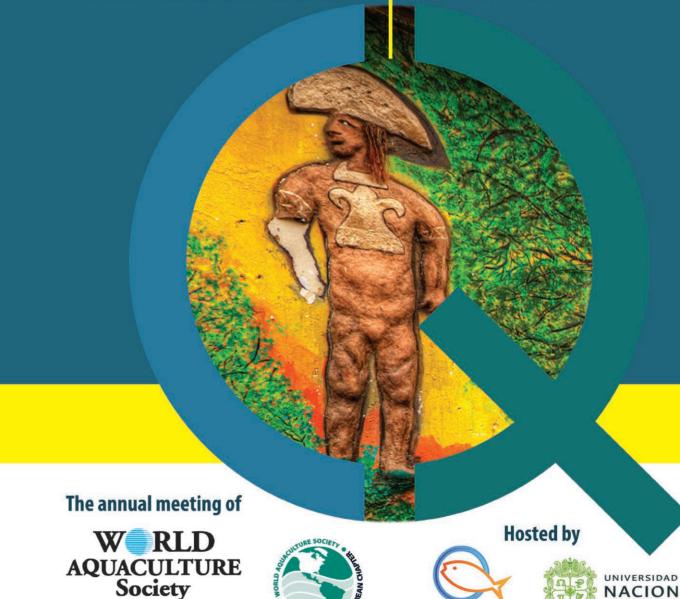


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