



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

TO: Chinese Secretariat of CCFA secretariat@ccfa.cc

FROM: Global Organization for EPA and DHA Omega-3s (GOED)

RE: Agenda Item 5(a) – General Standard for Food Additives

DATE: March 16, 2018

The Global Organization for EPA and DHA Omega-3s (GOED) is an association of processors, refiners, manufacturers, distributors, marketers, retailers and supporters of products containing eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA) omega-3 fatty acids. GOED's membership represents a broad range of businesses, from small entrepreneurs to multinational food companies. The Organization's objectives are to educate consumers about the health benefits of EPA and DHA and to collaborate with government groups, the healthcare community and the industry on issues related to omega-3s, while setting high standards for our business sector.

GOED thanks the United States of America for leading the electronic working group (eWG) on the General Standard for Food Additives (GSFA) to the 50th Session of the Codex Committee on Food Additives (CCFA).

GOED would like to provide the following comments on the Report of the electronic Working Group on the GSFA, Codex document CX/FA 18/50/7, in relation to Agenda item 5(a) – General Standard for Food Additives, for discussion at the 50th Session of the Codex Committee on Food Additives (CCFA) to be held in Xiamen, Fujian Province, China from 26-30 March 2018. GOED kindly requests the following comments be circulated to Codex members and observers and/or uploaded to the Codex website as a conference room document (CRD).

GOED supports the eWG Final Proposal for the following:

- Appendix 1
Food Category No. 02.1.3 Lard, tallow, fish oil, and other animal fats
Mono- and Diglycerides of Fatty Acids (INS 471)
Adopt at GMP with note XS211 and new note “Only for use as an emulsifier in fish oil at GMP, or as an antifoaming agent in oils and fats for deep frying conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981)”
- Appendix 5
Food Category No. 13.6 Food supplements
Tocopherols (INS 307 a, b, c)
Adopt at 2000 mg/kg with New Note “Except for use at 6,000 mg/kg, singly or in combination, on the basis of fish oil or algal oil content.”