



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

Submitted via www.regulations.gov

TO: Departments of Agriculture (USDA) and Health and Human Services (HHS)

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

RE: Docket Number FNS-2018-0005: Dietary Guidelines for Americans: Request for Comments on Topics and Questions

DATE: March 27, 2018

The Global Organization for EPA and DHA Omega-3s (GOED) is a 200+ member 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 & 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's members have a profound interest in ensuring that valuable information regarding EPA & DHA is communicated to consumers in a meaningful and timely way. Thus said, GOED appreciates the opportunity to provide written comments on the topics and questions to be examined in the review of scientific evidence supporting the development of the 2020-2025 Dietary Guidelines for Americans.

Infants and toddlers from birth to 24 months (healthy, full-term infants)

Given the documented importance of docosahexaenoic acid (DHA) during this life stage, GOED is surprised by the absence of any mention of DHA.

GOED recommends expanding the topic of duration of breast milk and infant formula feeding to include composition (including DHA). The questions listed, including "1) growth, size, and body composition; 2) food allergies and other atopic allergic diseases; and 3) long-term health outcomes" are relevant/applicable to composition, including DHA.

For the topic of "Dietary supplements (e.g., iron, vitamin D, vitamin B12)", GOED recommends including DHA.

Children and adolescents, ages 2-18 years old

GOED recommends expanding the first topic "dietary patterns to promote health and normal growth and meet nutrient needs" to include "prevent disease" as listed for "Adults, ages 19-64 years old" and "Older adults, ages 65 years and older". Disease prevention is a lifelong activity that should



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begin in childhood. Given the increasing prevalence of depression coupled with the growing body of scientific evidence implicating dietary deficiency of EPA and DHA in the pathophysiology and etiology of depression, GOED highly recommends the questions be expanded to include mental health (e.g. depression), an issue that is justifiably receiving increased attention.

Adults, ages 19-64 years old

As was suggested for “Children and adolescents, ages 2-18 years old”, GOED highly recommends the questions be expanded to include mental health (e.g. depression).

Pregnancy and lactation

As with the life stage of “infants and toddlers from birth to 24 months (healthy, full-term infants)”, given the documented importance of DHA during pregnancy and lactation, GOED is surprised by the lack of inclusion of DHA.

DHA should be added to the “Dietary supplements (e.g., iron, folate, vitamin D)” for consideration, particularly given the documented benefit of DHA for reducing early pre-term birth, which could save the U.S. healthcare system up to USD 6 billion.¹

With respect to the topic of “Seafood”, GOED recommends expanding the question “What is the relationship between seafood consumption during pregnancy and lactation and neurocognitive development of the infant?” to include consideration for the benefits of EPA and DHA. While the Environmental Protection Agency’s and FDA’s January 2017 “Eating Fish: What Pregnant Women and Parents Should Know”² did not acknowledge the benefits of EPA and DHA, the scientific analysis³ that underlies the guidance included a risk-benefit analysis that specifically compared the risks of mercury exposure to the benefits of EPA and DHA, concluding that the benefits for brain development outweighed the risks.

Older adults, ages 65 years and older

As was suggested for “Children and adolescents, ages 2-18 years old” and “Adults, ages 19-64 years old”, GOED highly recommends the questions be expanded to include mental health (e.g. depression).

¹ Shireman TI, Kerling EH, Gajewski BJ, Colombo J, Carlson SE. Docosahexaenoic acid supplementation (DHA) and the return on investment for pregnancy outcomes. Prostaglandins Leukot Essent Fatty Acids. 2016;111:8-10.

² <https://www.fda.gov/Food/ResourcesForYou/Consumers/ucm393070.htm>

³ <https://www.fda.gov/downloads/Food/FoodborneIllnessContaminants/Metals/UCM396785.pdf>