



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

20 November 2024

David W. Niebuhr, MD, MPH, MSs  
Medical Officer  
Evidence-Based Practice Center Program  
Center for Evidence and Practice Improvement  
Agency for Healthcare Research and Quality (AHRQ)  
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**RE: Deadline Extension Request for Supplemental Evidence and Data (SEAD) for Fat-Related Protocols**

Dear Dr. Niebuhr:

GOED, the Global Organization for EPA and DHA Omega-3s, represents the worldwide EPA and DHA omega-3 industry, with a membership built on a quality standard unparalleled in the market. Members must comply with quality and ethics guidelines that ensure they produce quality products that consumers can trust. Our 200+ members and partners represent the entire supply chain of EPA and DHA omega-3s, from fisheries and crude oil suppliers to refiners, concentrators and finished product brands. Our mission is to use science-based information to promote consumption of quality EPA & DHA from all sources for a positive impact on public health.

With that in mind, GOED is excited about the following fat-related topics that have been initiated for review by the Agency for Healthcare Research and Quality (AHRQ) Effective Health Care (EHC) Program as a critical step in advance of the review of macronutrient dietary reference intakes (DRI):

- 1) *Dietary Total Fat Intake and Dietary Polyunsaturated Fatty Acid Intake and Child Growth and Development Outcomes: A Systematic Review*
- 2) *Dietary Intake of Polyunsaturated Fatty Acids and Plasma Lipid and Cardiovascular Events*
- 3) *Dietary Saturated Fat Replacement and Plasma Lipid and Cardiovascular Events*

Given the importance of these reviews in helping to facilitate updating the DRIs for dietary fat and fatty acids, we write to express concern about anyone's ability to provide robust feedback on multiple protocols in such a short period of time and at this time of the year. While we understand that four weeks is the standard comment period, GOED does not have the bandwidth to address more than one protocol in such a short period of time. Given the timeframe for the information request (both end of year and over Thanksgiving), we already were finding it challenging to provide complete and timely feedback when we thought there was only one



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protocol (i.e. *Dietary Total Fat Intake and Dietary Polyunsaturated Fatty Acid Intake and Child Growth and Development Outcomes: A Systematic Review*) to address.

Keeping in mind the importance of these reviews, and while acknowledging the need to balance completeness and timeliness, GOED writes to respectfully request that AHRQ extend the deadline for submission of supplemental evidence and data (SEAD) for the second and third protocols mentioned above by 30 days.

We appreciate your consideration of our request and look forward to what will hopefully be a favorable response.

Sincerely,

A handwritten signature in blue ink, appearing to read "Harry B. Rice".

Harry B. Rice, PhD  
Vice-President, Regulatory & Scientific Affairs  
[harry@goedomega3.com](mailto:harry@goedomega3.com)

A handwritten signature in blue ink, appearing to read "K Roke".

Kaitlin Roke, PhD  
Director, Scientific Communication and Outreach  
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A handwritten signature in blue ink, appearing to read "Aldo Bernasconi".

Aldo Bernasconi, PhD  
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