



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

July 29, 2025

Astrid Lozano
c/o Canadian General Standards Board
L'Esplanade Laurier
140 O'Connor Street
Tower East, 6th floor
Ottawa, ON Canada K1A 0S5
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Dear Ms Lozano:

GOED, the Global Organization for EPA and DHA Omega-3s, represents the worldwide eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA) omega-3 industry, with a mission to use science-based information to promote the consumption of and enable access to quality EPA & DHA from all sources for a positive impact on public health. Our 200+ members represent the entire supply chain from fisheries and crude oil suppliers to refiners, concentrators and brands. Our activities focus on maintaining quality standards, educating consumers and healthcare professionals, advancing the science, and advocating for members with governments and non-governmental organizations (NGOs) throughout the world. To this end, GOED appreciates the opportunity to comment on the proposed modifications to the Canadian Organic Standards.

GOED writes to encourage the Canadian General Standards Board to add docosahexaenoic acid (DHA) algal oil to CAN/CGSB-32.311-202X (Organic production systems - Permitted Substances Lists). In the United States, since DHA algal oil, which is not organic, can be added to products labelled as "organic," it would make sense if the same were true in Canada given the 17 June 2009 arrangement between Canada and the United States recognizing each other's national organic systems as equivalent. What follows is an expanded explanation supporting our request.

In the United States, the Organic Foods Production Act (7 U.S.C. 6518(m)) and the USDA organic regulations (7 CFR §205.600) permit the inclusion of DHA algal oil as an ingredient in products labelled as "organic" based on its inclusion on the National List of Allowed and Prohibited Substances (National List) under the category of "nutrient vitamins and minerals."

Despite past efforts to remove DHA algal oil from the category of "nutrient vitamins and minerals," the National Organic Program (NOP) issued an [interim rule on 27 September 2012](#) which "... continues the allowance for nutrient vitamins and minerals at section 205.605(b) as follows: "Nutrient vitamins and minerals, in accordance with 21 CFR 104.20, Nutritional Quality Guidelines for Foods." This action enables the industry to continue with the status quo until additional public comments are received and a final rule is published. This action avoids the widespread disruption to the organic market that would occur if the allowance for any synthetic vitamins and minerals were to sunset ("expire") from the National List on October 21, 2012." Thus said, DHA algal oil remains a permissible ingredient for use in products labelled as "organic."



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Even if the NOP removes DHA algal oil from inclusion under the category of “nutrient vitamins and minerals,” it will not have an impact on the ability to use DHA algal oil in products labelled as “organic,” because the NOP intends to add DHA algal oil to another section of the National List. See [NOP’s 21 March 2012 memo](#).

On 17 June 2009, Canada and the United States entered into an arrangement - [United States-Canada Organic Equivalence Arrangement \(USCOEA\)](#) - recognizing each other’s national organic systems as equivalent. Thus said, a product with DHA algal oil can be certified as organic in the United States and shipped to and sold in Canada as organic. While there’s no requirement for Canada’s Permitted Substances Lists to align with the United States’ National List, and vice-versa, GOED notes in 10.1.3 of CAN/CGSB-32.310-202X (Organic production systems - General principles and management standards) that “Consideration shall be given to the consequences a proposed amendment may have on equivalency and harmonization of this standard with standards and regulations of other jurisdictions.” For this reason, it makes sense to add DHA algal oil to the Permitted Substances Lists.

In conclusion, GOED encourages the Canadian General Standards Board to add DHA algal oil to CAN/CGSB-32.311-202X (Organic production systems - Permitted Substances Lists).

Should you have any questions, please do not hesitate to contact me at harry@goedomega3.com.

Sincerely,

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

Harry B. Rice, PhD
Vice-President, Regulatory & Scientific Affairs