GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

February 7, 2020

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Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302
Submitted electronically via www.regulations.gov

RE: Docket No. FNS-2019-0001: Dietary Guidelines Advisory Committee

Dear Dietary Guidelines Advisory Committee:

GOED, the Global Organization for EPA and DHA Omega-3s, is a trade association representing 170+ companies worldwide that are active in the EPA and DHA omega-3 industry. GOED's membership includes all segments of the omega-3 supply chain from fishing and seafood companies to refiners, supplement manufacturers, food and beverage marketers and pharmaceutical companies. GOED's members agree to adhere to product quality and ethical standards that represent the benchmark for quality in the omega-3 market. GOED's mission is to increase global consumption of EPA and DHA and ensure that our members produce quality products that consumers can trust.

GOED thanks the Dietary Guidelines Advisory Committee (DGAC) for its tireless efforts and the opportunity to provide written comments, which are specific to the systematic review protocol to be used by the Pregnancy and Lactation Subcommittee to answer the following question: *What is the relationship between omega-3 fatty acids from supplementation and/or fortified foods consumed before and during pregnancy and lactation and specific health outcomes?*

On January 23-24, 2020, GOED tuned into the webcast of the fourth meeting of the DGAC. While no update was provided on the systematic review to answer the above question, GOED wants to reiterate its July 24, 2019 and October 23, 2019 comments to the DGAC encouraging the inclusion of preterm and early preterm birth as relevant outcomes. These outcomes are clearly in scope, because this Subcommittee is addressing another question (i.e. *What is the relationship between dietary patterns consumed during pregnancy and gestational age at birth?*) which includes gestational age at birth.

In November 2018, an updated Cochrane Review[1] of 70 randomized controlled trials (RCTs), involving almost 20,000 women, reported that O-3 LCPUFA interventions (supplementation or food additions) during pregnancy reduce the risk of preterm and early preterm birth by 11% and

[1]Middleton P, Gomersall JC, Gould JF, Shepherd E, Olsen SF, Makrides M. Omega-3 fatty acid addition during pregnancy. Cochrane Database Syst Rev. 2018: 15;11:CD003402. https://www.ncbi.nlm.nih.gov/pubmed/30480773

42%, respectively. On January 29, 2020, during *Nutrition During Pregnancy and Lactation: Exploring New Evidence - A Workshop*[2], Dr. Maria Makrides, coauthor of this Cochrane Review, provided further substantiation and clarification about the benefits of omega-3s for reducing the risk of preterm and early preterm birth.

With knowledge that pregnant women's omega-3 intakes are low[3,4], coupled with an economic impact assessment concluding DHA for reducing early preterm birth could save the U.S. healthcare system up to USD 6 billion[5], such risk reductions are of public health relevance that cannot be ignored.

Thank you in advance for consideration of our comments.

Sincerely,

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

[2] http://www.nationalacademies.org/hmd/Activities/Nutrition/NutritionDuringPregnancyandLactationWorkshop.aspx

[3] Zhang Z, Fulgoni VL, Kris-Etherton PM, Mitmesser SH. Dietary Intakes of EPA and DHA Omega-3 Fatty Acids among US Childbearing-Age and Pregnant Women: An Analysis of NHANES 2001-2014. Nutrients. 2018 Mar 28;10(4). pii: E416.
https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5946201/pdf/nutrients-10-00416.pdf

[4] Thompson M, Hein N, Hanson C, et al. Omega-3 Fatty Acid Intake by Age, Gender, and Pregnancy Status in the United States: National Health and Nutrition Examination Survey 2003–2014. Nutrients. 2019 Jan 15;11(1). pii: E177.
https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6356780/pdf/nutrients-11-00177.pdf

[5] 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.
https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4978141/pdf/nihms-793254.pdf