



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

March 8, 2021

Dockets Management Staff (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852  
Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

RE: Docket No. FDA-2020-N-1720: Labelling of Foods Comprised of or Containing Cultured Seafood Cells; Request for Information

To Whom It May Concern:

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 Agency for the opportunity to provide comments on "Labelling of Foods Comprised of or Containing Cultured Cells." GOED's comments are specific to question 5 which reads as follows: *When comparing conventionally produced seafood to foods comprised of or containing cultured seafood cells, what attributes (such as nutrition, taste, texture, or aroma) vary between the foods and should FDA consider to be material to consumers' purchasing and consumption decisions?*

Importantly, fats are nutritionally-relevant in seafood, especially the omega-3 long-chain polyunsaturated fatty acids (PUFAs) eicosapentaenoic acid (EPA) and docosahexaenoic acid, and consumers have a right to this information. For this reason, GOED advocates for the inclusion of EPA and DHA on the Nutrition Facts Panel. GOED is well aware that the absence of a dietary reference intake (DRI) for EPA and DHA, individually or combined, currently precludes implementing this recommendation at the present time. Proposed rulemaking, however, can remedy this issue and make it possible for consumers to make informed decisions when shopping for seafood.

Conventional seafood is the only food with significant amounts of EPA and DHA. In order to be called a food comprised of or containing cultured seafood cells, it should contain EPA and DHA. When cultured seafoods are produced, EPA and DHA are not automatically incorporated unless the cells are grown in the presence of these fatty acids. Thus said, depending upon the production of the cultured seafood cells, there could be a difference in the EPA and DHA levels between



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conventional seafood and that of a food comprised of or containing cultured seafood cells. The important point is that the cell-based offerings should contain EPA and DHA and be labelled with information on the amounts.

Thank you in advance for consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'H. Rice'.

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

A handwritten signature in black ink, appearing to read 'G. Bannenberg'.

Gerard Bannenberg, Ph.D.  
Director, Technical Compliance & Outreach