



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

18 November 2021

Minister of Food and Drug Safety
C/O Ministry of Food and Drug Safety
Food Standards Division
Osong Health Technology Administration Complex
187 Osongsaengmyeong2(i)-ro, Osong-eup, Heungdeok-gu
Cheongju-si, Chungcheongbuk-do, Korea 28159

RE: 8 October 2021 Administrative Notice for the Proposed Amendment of Food Standards and Specifications - Establishment of Fatty Acid Specifications for Krill Oil and Test Methods for Phospholipids¹

Dear Minister KIM Ganglip:

GOED, the Global Organization for EPA and DHA Omega-3s, represents the worldwide EPA and DHA omega-3 industry, with a mission to increase consumption of EPA and DHA omega-3s around the world. The membership is built on a quality standard unparalleled in the market and members must comply with quality and ethics guidelines that ensure members produce quality products that consumers can trust. Our 160+ members represent the entire supply chain of EPA and DHA omega-3s, from fisheries and crude oil suppliers to refiners, concentrators and finished product brands.

GOED writes regarding the MFDS' 8 October 2021 Administrative Notice for the Proposed Amendment of Food Standards and Specifications, specifically the establishment of fatty acid specifications for krill oil and test methods for phospholipids.

GOED supports the MFDS' efforts to detect and eliminate the sale of krill oil products adulterated with vegetable oils. Thus said, in addition to the existing specification for phospholipid content of $\geq 30\%$, GOED supports the inclusion of the following specifications:

- linoleic acid: $\leq 3\%$
- myristic acid: 5-13%

GOED also supports the inclusion of adequate methods for the quantification of phospholipid content by P-NMR and HPLC while eliminating the less reproducible method by acetone precipitation. However, we have received feedback from some members that there are no laboratories in South Korea that offer P-NMR testing. For this reason, GOED suggests the MFDS encourages domestic laboratories to adopt the P-NMR testing and validate the HPLC method as a suitable alternative testing method for quantification of phospholipid content by comparing it to P-NMR. It is critical that the government-sponsored laboratories offer the P-

¹ https://www.mfds.go.kr/eng/brd/m_61/view.do?seq=123



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NMR and/or the validated HPLC testing methods when the acetone precipitation method is abandoned officially.

Finally, in the event the MFDS is not aware, GOED member ORIVO AS (<https://orivo.no/>) runs a commercial service to document the authenticity of krill oils. The basis for the service is nuclear magnetic resonance spectroscopy (^{13}C NMR) and a database of reference samples. Several omega-3 brands in Asia already use the service.

Sincerely,

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

Harry B. Rice, PhD
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A handwritten signature in black ink, appearing to read "Gerard Bannenberg".

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