



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

28 April 2023

Food Safety and Quality Section
Ministry of Health Malaysia

Regarding: Seranta Awam Atas Talian Bil 1/2023 Bagi Draf Pindaan Peraturan-Peraturan Makanan 1985

To Whom It May Concern:

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 170+ 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's members have a profound interest in ensuring that valuable information regarding eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA) is communicated to consumers in a meaningful and timely way. Thus said, GOED appreciates the opportunity to provide written comments regarding Seranta Awam Atas Talian Bil 1/2023 Bagi Draf Pindaan Peraturan-Peraturan Makanan 1985. GOED's comments will focus on the proposal to amend the Fifth Schedule to include the declaration of nutrient content for DHA.

While GOED appreciates the consideration of the nutrient content claim "Source of DHA," we would like to request the claim be expanded to include EPA and reworded to "Source of Omega-3 Fatty Acids," "Source of Omega-3s" or "Source of EPA+DHA" in order to reflect the inclusion of EPA. Furthermore, GOED recommends the condition of use be modified to 40mg EPA+DHA per 100g. The reason for our request to expand the claim wording and condition of use is that the science supports the benefit of the combination of EPA+DHA.

The exception would be if the claim is intended specifically for products marketed for infants (0-12 months) and toddlers (12-36 months), in which case "Source of DHA" would be an appropriate nutrient content claim.

Many countries (e.g. Arab States of Persian Gulf, European Union, South Africa and United Arab Emirates) around the world have adopted "Source of Omega-3 Fatty Acids" claims, and it's been for the combination of EPA and DHA, not limited to DHA.

I am at your disposal to discuss this further. Thank you in advance for your consideration of GOED's comments.

Sincerely,

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

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