



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

April 10, 2025

Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW, Room 2642-S, STOP 0268
Washington, DC 20250-0268
Submitted electronically at www.regulations.gov

RE: Doc. No. AMS–NOP–24–0081, NOSB Spring 2025 Meeting, Fish Oil CAS # Technical Correction

Dear NOSB Members:

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 200+ members and partners represent the entire supply chain of EPA and DHA omega-3s, from fisheries and crude oil suppliers to refiners, concentrators and finished product brands.

For the record, GOED supports the Handling Subcommittee’s recommendation to remove the CAS numbers included in the fish oil listing at 7 CFR 205.606, as a technical correction, so it reads: “(f) Fish oil—stabilized with organic ingredients or only with ingredients on the National List, §§ 205.605 and 205.606.”

Thank you for the opportunity to submit comments. In the event 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