



## GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

International Cooperation Office  
Ministry of Food and Drug Safety  
Sent via email to [intmfd@korea.kr](mailto:intmfd@korea.kr)

30 November 2020

To Whom It May Concern:

The Global Organization for EPA and DHA Omega-3s (GOED) is an international association of processors, refiners, manufacturers, distributors, marketers, retailers and supporters of products containing eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA) omega-3 fatty acids. GOED's membership represents a broad range of businesses, from small entrepreneurs to multinational food companies. Our mission is to increase consumption of EPA and DHA omega-3s and to ensure that our members produce quality products that consumers can trust. To this end, GOED, a recognized Codex Observer<sup>1</sup>, was intimately involved in discussions about and adoption of the Codex Standard for Fish Oils (CXS 329-2017).<sup>2</sup>

This leads me to the purpose of my letter. With respect to World Trade Organization (WTO) Notification G/SPS/N/KOR/698 dated 8 October 2020 concerning *Ministry of Food and Drug Safety Announcement 2020-427* dated 28 September 2020, GOED writes to express its support for the revision of the arsenic standard in fish oil to account for inorganic arsenic as detailed in the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-195)<sup>3</sup> as follows:

*For fish oils covered by CXS 329-2017, the ML is for fish oils (As-in). Countries or importers may decide to use their own screening when applying the ML for As-in in fish oils by analyzing total arsenic (As-tot) in fish oils. If the As-tot concentration is below the ML for As-in, no further testing is required, and the sample is determined to be compliant with the ML. If the As-tot concentration is above the ML for As-in, follow-up testing shall be conducted to determine if the As-in concentration is above the ML.*

In fact, to ensure the free trade of high-quality fish oils, GOED encourages the adoption of the Codex Standard for Fish Oils (CXS 329-2017) in full.

Thank you for your consideration of GOED's comments.

Sincerely,

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

<sup>1</sup> <http://www.fao.org/fao-who-codexalimentarius/about-codex/observers/observers/obs-list/en/>

<sup>2</sup> [http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCODEX%252FBSTAN%252F329-2017%252FCXS\\_329e.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCODEX%252FBSTAN%252F329-2017%252FCXS_329e.pdf)

<sup>3</sup> [http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCXS%252FB193-1995%252FCXS\\_193e.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCXS%252FB193-1995%252FCXS_193e.pdf)