



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

Directorate: Food Control
Director General of Health
Private Bag X828
PRETORIA
0001
South Africa
Sent via email to minister@health.gov.za

20 June 2019

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.

This letter is in response to World Trade Organization (WTO) Notification G/TBT/N/ZAF/237¹ dated 8 May 2019 concerning the repeal of *Regulations Relating to Edible Fats and Oils, Government Notice No. R. 1316 of 16 August 1996*. While fish oil is but one of the oils covered by the regulation being repealed, GOED suggests consideration be given to adopting the Codex Standard for Fish Oils (CXS 329-2017).² GOED, a recognized Codex Observer³, was intimately involved in discussions about and adoption of this Standard, which was created to ensure the production of high-quality fish oils, while optimizing the promotion of free trade.

Should you have any questions or wish to discuss the Standard for Fish Oils, please do not hesitate to contact us.

Sincerely,

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¹ <http://164.100.105.198:8098/php/BIS/wto/admin/uploads/GTBTN19ZAF237.pdf>

² http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?ink=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCODEX%252FBSTAN%252F2017%252FCXS_329e.pdf

³ <http://www.fao.org/fao-who-codexalimentarius/about-codex/observers/observers/obs-list/en/>