



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

13 October 2020

Dr. Chia-Ding Liao
Taiwan Food and Drug Administration

Dear Dr. Liao,

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 fish oil 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.

On behalf of GOED, I write to support the draft "Restrictions on the Use of Fish Oil as a Food Material"¹ published 20 August 2020. GOED is particularly pleased to see the removal of the concentration restriction requiring all fish oils to be less than 50% EPA/DHA. Lifting this restriction will allow increased product options for Taiwanese consumers seeking to increase reportedly low EPA/DHA intakes. According to Micha and colleagues,² Taiwanese adults consume an average of less than 50 mg/day of EPA+DHA, a level that is five times less than the minimum intake recommendation resulting from the expert consultation between the Food and Agricultural Organization (FAO) of the United Nations and the World Health Organization (WHO).³

Products with an EPA/DHA concentration greater than 50% are safe for the general population and assessments from Norway,⁴ the European Union⁵ and most recently from the United States⁶ provide substantiation to this effect.

¹ <https://www.fda.gov.tw/TC/newsContent.aspx?cid=5072&id=26318>

² Micha R, Khatibzadeh S, Shi P, et al.; Global Burden of Diseases Nutrition and Chronic Diseases Expert Group NutriCoDE. Global, regional, and national consumption levels of dietary fats and oils in 1990 and 2010: a systematic analysis including 266 country-specific nutrition surveys. *BMJ*. 2014 Apr 15;348:g2272. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3987052/>

³ Food and Agriculture Organization of the United Nations (2010). Fats and fatty acids in human nutrition: Report of an expert consultation. FAO Food and Nutrition Paper 91. Rome. <http://www.fao.org/docrep/013/i1953e/i1953e00.pdf>

⁴ Norwegian Scientific Committee for Food Safety (VKM). (2011) Evaluation of negative and positive health effects of n-3 fatty acids as constituents of food supplements and fortified foods. <http://www.vkm.no/dav/c7a41adb79.pdf>

⁵ EFSA Panel on Dietetic Products, Nutrition and Allergies. (2012) Scientific Opinion related to the Tolerable Upper Intake Level of eicosapentaenoic acid (EPA), docosahexaenoic acid (DHA) and docosapentaenoic acid (DPA). *EFSA J* 10(7):2815. http://www.efsa.europa.eu/sites/default/files/scientific_output/files/main_documents/2815.pdf

⁶ Letter Responding to Health Claim Petition dated April 24, 2014: "Eicosapentaenoic Acid and Docosahexaenoic Acid and Reduction of Blood Pressure in the General Population" (June 19, 2019).



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

Thank you for your consideration of GOED's comments. Should you ever need information related to EPA/DHA, please do not hesitate to contact me at harry@goedomega3.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Harry B. Rice", is written over a light blue horizontal line.

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

https://www.fda.gov/media/128043/download?utm_campaign=CFSANCU%20-%20FDA%20Announces%20New%20Qualified%20Health%20Claims%20for%20EPA%20and%20DHA%20Omega-3&utm_medium=email&utm_source=Eloqua

1075 Hollywood Ave, Salt Lake City, Utah 84044, United States
Tel: +1 (801) 746-1413 Fax: +1 (801) 474-2571
www.goedomega3.com