



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

September 28, 2021

Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW, Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268
Submitted electronically at [regulations.gov](https://www.regulations.gov)

RE: Docket ID: AMS-NOP-21-0038, Meeting of the National Organic Standards Board (NOSB)
October 2021, Fish Oil Annotation

Dear Ms. Arsenault:

GOED represents the worldwide industry for eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA), the primary long-chain omega-3 fatty acids found in fish oil. Our membership is built on a quality standard unparalleled in the market and our mission is to increase consumption of EPA and DHA omega-3s and ensure our members produce quality products that consumers can trust.

GOED understands the Handling Subcommittee (HS) will lead a discussion on modifications to the current fish oil annotation during the upcoming NOSB meeting (October 19-21). For your consideration, GOED is providing the below comments about the HS' August 13th discussion document on this topic.

As expressed previously, GOED supports sustainable fishing practices and views a modification to the fish oil annotation as an acceptable solution to address sustainability concerns and to ensure that fish oil is compatible with organic practices.

GOED notes the proposed annotation is a minor modification of annotation option #2 included in the HS' discussion document dated 18 February 2021 on the same topic and discussed during the spring 2021 meeting. Annotation option #2 was supported by GOED in its 12 April 2021 written comments and its 22 April 2021 oral comments. The current annotation, with its minor modification, does not change GOED's support of the annotation. Thus said, GOED supports the following annotation:

Fish oil annotation: §205.606 (e) Fish oil (Fatty acid CAS #'s: 10417-94-4, and 25167-62-8) - stabilized with organic ingredients or only with ingredients on the National List, §§205.605 and 205.606. *Sourced from fishing industry by-product only and certified as sustainable against a third-party certification that is International Social and Environmental Accreditation and Labeling (ISEAL) Code Compliant or Global Seafood Sustainability Initiative (GSSI) recognized.*



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Thank you for the opportunity to submit comments. Should you have any questions, please do not hesitate to contact me via email at harry@goedomega3.com. In addition, I will be presenting oral comments during one of the upcoming webinars.

Sincerely,

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

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