



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

Oral Comments Delivered (via webinar) to the NOSB on Thursday, 22 April 2021

My name is Harry Rice and I am with the Global Organization for EPA and DHA Omega-3s (GOED), which represents the worldwide industry for EPA and 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 and to ensure that our members produce quality products that consumers can trust.

Today, I am going to address the Handling Subcommittee's proposed options for modifying the current fish oil annotation.

GOED supports sustainable fishing practices. While fish oil for human consumption is always a value-added by-product of fish meal or seafood production because the protein's value is much greater than that of the oil, there are those that remain unconvinced. For this reason, GOED views a modification to the fish oil annotation as an acceptable solution to address sustainability concerns and ensure that fish oil is compatible with organic practices.

In GOED's written and oral comments from the spring 2020 meeting, GOED recommended a modification of the fish oil annotation that is aligned with Option #1 from the Handling Subcommittee's February 18, 2021 discussion document on the fish oil annotation. GOED continues to support this modification. That is, GOED supports the expansion of the current fish oil annotation to include the following – ***Sourced from fishing industry by-product only and certified as sustainable by a third-party certifier.***

At the same time, we understand a limitation of this annotation is that the NOSB would need to create and maintain a list of acceptable third party certifiers. For this reason, GOED also supports Option #2, which expands the current fish oil annotation to include the following - ***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 with full utilization of said scheme.*** This option essentially ensures third party certifiers are held to the highest sustainability best practices.

It is GOED's opinion that Option #3, ***Sourced from fishing industry by-product only and has either a green or yellow Seafood Watch rating or is eco-certified to a standard recommended by Seafood Watch (<https://www.seafoodwatch.org/>)***, is not a viable option at this time, because the scope of fish species and locations assessed is much too limited. The unintended consequence of adopting this option could result in the removal from the market of many of the products labelled "organic" with fish oil and thus defeat the purpose of relisting fish oil on the National List. It's important to keep in mind that the goal at the end of the day is to ensure that consumers who prefer organic products have access to products made with non-organically produced fish oil, since organic fish oil does not currently exist.

As always, thank you for your time and tireless efforts.