



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

May 7, 2025

Docket No. 250414-0065

BIS-2025-0022

XRIN 0694-XC120

Secretary Howard W. Lutnick  
United States Department of Commerce  
1401 Constitution Avenue, N.W.  
Washington, D.C. 20230  
Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

RE: Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients

Dear Secretary Lutnick:

GOED, the Global Organization for EPA and DHA Omega-3s, represents the eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA) omega-3 industry, with a mission to increase consumption of EPA and DHA omega-3 fatty acids, found in many dietary supplements and fortified foods, around the world. GOED has more than 200 member companies who are required to comply with our strict quality standards, which ensures they produce quality products that consumers can trust to have a positive impact on public health. On behalf of our membership, GOED appreciates the opportunity to provide comments regarding the Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients.

It is essential for our nation's health and well-being that we maintain a ready and affordable supply of critical nutrients, including omega-3 rich oil sources of the fatty acids EPA and DHA. These fatty acids are crucial to the viability of virtually every cell in the human body and are of vital importance across the lifespan, beginning with prenatal health for reducing the risk of preterm and early preterm birth<sup>1</sup> and in utero/infant health, particularly brain<sup>2</sup> and eye development,<sup>3</sup> and continuing through to adulthood, where omega-3s support a healthy heart<sup>4</sup> and brain.<sup>5</sup>

GOED greatly appreciates the Trump Administration's efforts to *Make America Healthy Again* and we see the 40 dietary ingredients included in Annex II of the April 2 Executive Order - Regulating Imports with a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Goods Trade Deficits of significant importance for achieving that goal. Included in Annex II are HTSUS 2915.90.10 and 2916.19.30, which are just two of the many tariff

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<sup>1</sup> <https://www.cochranelibrary.com/cdsr/doi/10.1002/14651858.CD003402.pub3/full>

<sup>2</sup> <https://www.efsa.europa.eu/en/efsajournal/pub/3840>

<sup>3</sup> <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2009.1006>

<sup>4</sup> [https://www.mayoclinicproceedings.org/article/S0025-6196\(21\)00183-X/fulltext](https://www.mayoclinicproceedings.org/article/S0025-6196(21)00183-X/fulltext)

<sup>5</sup> <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0120391>



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codes associated with EPA/DHA-rich oil ingredients used to produce EPA/DHA-rich dietary supplements.

Because some of the ingredients in Annex II can also be used in the production of pharmaceutical products, we wanted to submit these comments to bring their important role in providing nutritional supplementation to your attention and to be part of the study record. We ask that HTSUS 2915.90.10 and 2916.19.30 not be inadvertently included in the 232 investigation and therefore unintentionally be subject to any forthcoming tariffs that could threaten Americans' ready and affordable access to the EPA/DHA omega-3s represented by these codes.

In addition to requesting exemption for HTSUS 2915.90.10 and 2916.19.30, GOED takes this opportunity to request that the Trump Administration extend the exemption list to include the following HTSUS codes associated with EPA/DHA ingredients used in the production of EPA/DHA rich supplements, to be sure we are protecting the health of Americans by continuing to provide affordable access to these key nutrients:

1504.10.20	1516.30.00
1504.10.40	1517.90.20
1504.20.20	1517.90.90
1504.20.40	1518.00.40
1504.20.60	1603.00.90
1506.00.00	2106.90.92
1515.60.05	2106.90.99
1515.90.81	2916.19.50
1516.10.00	3824.99.41
1516.20.91	

The Trump Administration's focus on Making America Healthy Again and recognition of the key role that critical vitamins, minerals and other nutrients (i.e. EPA & DHA omega-3 fatty acids) play in helping to maintain and improve the health of Americans is of great importance to GOED. We stand ready to provide any additional information or clarifications the Department finds necessary as it undertakes this study.

Sincerely,

Ellen Schutt  
Managing Director

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