



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

February 10, 2025

TO: Secretaries of HHS and USDA (submitted electronically via www.regulations.gov)

RE: Docket HHS–OASH–2024–0017; Scientific Report of the 2025 DGAC

Dear Secretaries:

GOED, the Global Organization for EPA and DHA Omega-3s, represents the worldwide industry for eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA), with a mission to use science-based information to promote consumption of and enable access to quality EPA & DHA from all sources for a positive impact on public health. The membership is built on a quality standard unparalleled in the market and members must comply with quality and ethics guidelines that ensure members produce quality products that consumers can trust. Our 200+ members and partners represent the entire supply chain of EPA and DHA, from fisheries and crude oil suppliers to refiners, concentrators and finished product brands.

GOED's members have a profound interest in ensuring that valuable and accurate information regarding EPA and DHA is communicated to consumers in a meaningful and timely way. Thus said, GOED thanks the United States Departments of Health and Human Services (HHS) and Agriculture (USDA) for the opportunity to provide written comments on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee (DGAC).¹

While the DGAC should be applauded for its work on the questions it addressed, there was a glaring absence of any recognition for the underconsumption of EPA and DHA and the benefits afforded by supplementation. Not only did the 2020 DGAC² make a recommendation for the 2025 DGAC to “Examine a question on the relationship between omega-3 fatty acid supplements consumed before and during pregnancy and pregnancy outcomes,” but GOED requested (May 16, 2022) a question addressing the benefit of omega-3 long-chain polyunsaturated fatty acid (i.e. EPA & DHA) interventions during pregnancy for reducing the risk of preterm and early preterm birth be added in the review of evidence to support the development of the Dietary Guidelines for Americans, 2025–2030.

GOED appreciates the difference between Dietary Reference Intakes (DRIs), which provide nutrient recommendations, and the Dietary Guidelines, which provide food-based recommendations to help the public forge healthy dietary patterns that meet the DRIs. At the same time, the present Scientific Report addresses nutrients (i.e. vitamin D, calcium, potassium,

¹2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025*

Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture. U.S. Department of Health and Human Services.

²Dietary Guidelines Advisory Committee. 2020. *Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services.* U.S. Department of Agriculture, Agricultural Research Service, Washington, DC.



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and dietary fiber) of public health concern due to underconsumption. The only difference between those nutrients and EPA and DHA is that the former are associated with a DRI. Given that the Joint U.S.-Canadian DRI Working Group (WG) has prioritized updating the DRIs for the macronutrients, GOED looks forward to the Food and Nutrition Board of the National Academies of Sciences, Engineering, and Medicine establishing a DRI for EPA and DHA and therefore, allowing the next DGAC to address the role of EPA and DHA in the American diet.

Once again, thank you for receiving our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'H. Rice', with a long, sweeping horizontal stroke extending to the right.

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