



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

22 December 2021

Tianjan Ding/Shang Kaiyuan  
General Administration of Customs of Peoples Republic of China (GACC)

Email: [shipinjuyichu@customs.gov.cn](mailto:shipinjuyichu@customs.gov.cn); [division\\_registration@customs.gov.cn](mailto:division_registration@customs.gov.cn)

RE: Registration Regulations (Decree 248) and Administrative Measures (Decree 249)

Dear Tianjian Ding and Shang Kaiyuan:

GOED, the Global Organization for EPA and DHA Omega-3s, represents the worldwide EPA and DHA omega-3 industry, with a mission to increase consumption of EPA and DHA omega-3s around the world. 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 160<sup>+</sup> members represent the entire supply chain of EPA and DHA omega-3s, from fisheries and crude oil suppliers to refiners, concentrators and finished product brands.

Regarding Decrees 248 and 249, GOED understands there are outstanding details on their implementation for which governments around the world continue to seek guidance from China. Without these details, we are concerned that our members, who ship omega-3 rich oils and finished dietary supplement products to China, will be unable to adapt to the new rules by 1 January 2022. For this reason, I write to respectfully request an 18-month delay in the implementation of Decrees 248 and 249 in order to ensure a smooth transition for the relevant administrative systems to be fully operational.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Harry B. Rice', is written over a light blue circular stamp.

Harry B. Rice, PhD  
VP, Regulatory & Scientific Affairs  
[harry@goedomega3.com](mailto:harry@goedomega3.com)