



**GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S**

Chief Executive Officer  
Food Safety and Standards Authority of India (FSSAI)  
FDA Bhawan, Kotla Road  
New Delhi, India 110002  
Sent via email to [regulation@fssai.gov.in](mailto:regulation@fssai.gov.in)

11 July 2022

Dear Chief Executive Officer:

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+ 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.

With respect to the Food Safety and Standards (Food Products Standards and Food Additives) Amendment Regulations, 2022<sup>1</sup> published in *The Gazette of India* on 25 May 2022, GOED writes to provide comments on the proposed changes to sub-regulation 2.6.1, clause (12) relating to ‘Sardine Oil,’ found on pages 32-35.

GOED agrees with the proposed substitution of ‘Sardine Oil’ with ‘Fish Oil’; however, given that the proposed text is based on the Codex Standard for Fish Oils (CXS 329-2017),<sup>2</sup> GOED believes the proposed text in the draft clause for ‘Fish Oil’ should just refer to the Codex Standard for Fish Oil. This change would eliminate the need to update the Food Safety and Standards (Food Products Standards and Food Additives) Regulations in the future when changes are made to the Codex Standard for Fish Oils.

GOED, as a recognized Codex Observer,<sup>3</sup> was intimately involved in discussions about and adoption of this Standard. Given that the Delegation of India, which included two delegates from FSSAI at the 25<sup>th</sup> Session of the Codex Committee on Fats and Oils (CCFO), did not oppose forwarding the draft Standard for Fish Oils to the 40<sup>th</sup> Session of the Codex Alimentarius Commission (CAC) for adoption in 2017, GOED assumes FSSAI supports the standard as well.

Should you have any questions about our comments, please do not hesitate to contact us.

Sincerely,

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<sup>1</sup> [https://www.fssai.gov.in/upload/uploadfiles/files/Draft\\_notification\\_FPS\\_FA\\_31\\_05\\_2022.pdf](https://www.fssai.gov.in/upload/uploadfiles/files/Draft_notification_FPS_FA_31_05_2022.pdf)

<sup>2</sup> [https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCXS%2B329-2017%252FCXS\\_329e.pdf](https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCXS%2B329-2017%252FCXS_329e.pdf)

<sup>3</sup> <http://www.fao.org/fao-who-codexalimentarius/about-codex/observers/observers/obs-list/en/>