



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

Submitted via WHHungerHealth@hhs.gov

TO: White House Office of Public Engagement

FROM: Global Organization for EPA and DHA Omega-3s (GOED)

RE: White House Conference on Hunger, Nutrition, and Health

DATE: July 15, 2022

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 eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA) 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.

GOED applauds the Biden-Harris Administration for its efforts to end hunger and to increase healthy eating and physical activity by 2030 so that fewer Americans experience diet-related diseases. To this end, GOED appreciates the opportunity to provide input to inform the national strategy to be released at the White House Conference on Hunger, Nutrition, and Health.

GOED recommends that in order to reduce the incidence or prevalence of diet-related disease, the Biden-Harris Administration include dietary reference intake (DRI) reviews as part of the strategy. As mentioned in GAO-21-593,¹ a federal strategy is needed to coordinate diet-related efforts like DRI reviews. While DRIs identify specific nutrient needs and underpin the Dietary Guidelines for Americans, which forms the cornerstone of federal nutrition policy and programs, most DRIs are outdated.

Of particular interest to GOED is a review of the science associated with the macronutrient fat and its components, which includes EPA and DHA. While there is currently an Energy DRI Study Committee, and a Standing Committee for the Review of the Dietary Reference Intakes Framework, it is GOED's understanding that a financial commitment to review the macronutrients, or any other vitamin or mineral for that matter, has not been secured.

In 2002, the Institute of Medicine (IOM), now known as the National Academy of Medicine (NAM), concluded that insufficient data were available to define DRIs for EPA or DHA. Since that time, the body of scientific evidence supporting a benefit of EPA and DHA has grown and the

¹ <https://www.gao.gov/products/gao-21-593>



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public health importance of the relationships of EPA/DHA intakes is clearer than ever. Despite GOED’s efforts over the last decade, there remains an absence of a DRI for these fatty acids. In 2009, GOED, along with eight other associations/organizations, filed a Citizen Petition requesting the Food and Nutrition Board (FNB) of the IOM to convene an expert panel to update DRIs for EPA and DHA. In 2013, in response to a call for DRI nutrient review nominations, GOED nominated EPA and DHA. While EPA and DHA were selected as top priority nutrients for DRI reviews by both the Canadian and U.S. Governments, no review has commenced.

Of the many health benefits associated with EPA/DHA intake, the body of scientific evidence is most developed and strongest for cardiovascular health. To illustrate the benefits of EPA/DHA for cardiovascular health, particularly in “communities of color,” which are highlighted as of importance in the *White House Conference on Hunger, Nutrition, and Health: Toolkit for Partner-Led Convenings*, GOED is sharing the results from a sub analysis from a relatively recent primary prevention study known as VITAL (Vitamin D and Omega-3 Trial).² VITAL investigated, among other things, whether taking 840 mg/day of EPA+DHA reduces the risk of major cardiovascular disease (CVD) events in people without CVD. These events were specifically defined as the composite of myocardial infarction (MI), stroke and CVD death. Subjects were men and women, with African Americans making up 20% of the study population. One of the most striking results from this trial was that the reduction of heart attack risk among those taking omega-3s was especially pronounced among African American participants, with a 77 percent reduction observed. This is particularly relevant given that in 2018, African Americans were 30 percent more likely to die from heart disease than non-Hispanic whites.³

To provide further evidence for the need to increase EPA/DHA intake and to illustrate the number of lives that could be saved or the quality of life improved by increasing EPA/DHA intake, GOED retrieved data from the 2019 Global Burden of Disease Study,⁴ specifically on the impact of a diet low in seafood omega-3s (defined as average daily consumption (in milligrams per day) of less than 430–470 milligrams of EPA/DHA) on deaths from ischemic heart disease (IHD) and disability-adjusted life years (DALYs). The data are for all ages and males and females combined.

	Value	Upper (95% CI)	Lower (95% CI)
Deaths	16,069	19,045	11,626
DALYs	279,726	328,989	199,004

² Manson JE, Cook NR, Lee IM, Christen W, Bassuk SS, Mora S, Gibson H, Albert CM, Gordon D, Copeland T, D’Agostino D, Friedenberg G, Ridge C, Bubes V, Giovannucci EL, Willett WC, Buring JE; VITAL Research Group. Marine n-3 Fatty Acids and Prevention of Cardiovascular Disease and Cancer. *N Engl J Med*. 2019 Jan 3;380(1):23-32. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6392053/>

³ U.S. Department of Health and Human Services Office of Minority Health <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlid=19>

⁴ Global Burden of Disease Collaborative Network. Global Burden of Disease Study 2019 (GBD 2019) Results. Seattle, United States: Institute for Health Metrics and Evaluation (IHME), 2020. Available from <https://vizhub.healthdata.org/gbd-results/>.



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In conclusion, GOED recommends that in order to reduce the incidence or prevalence of diet-related disease, the Biden-Harris Administration include dietary reference intake (DRI) reviews as part of its strategy, particularly a review of the macronutrient fat and its components, which includes EPA and DHA. Thank you in advance for your consideration of our comments and good luck with the conference!

Sincerely,

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

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

A handwritten signature in blue ink, appearing to read 'Aldo Bernasconi', written over a faint, light blue circular watermark.

Aldo Bernasconi, Ph.D.
Vice-President, Data Science