



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

Public Authority for Food and Nutrition (PAFN), Kuwait
info@pafn.gov.kw

3 August 2022

To Whom It May Concern:

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.

GOED writes regarding the 6 October 2021 World Trade Organization (WTO) Notification (G/TBT/N/ARE/513, G/TBT/N/BHR/614, G/TBT/N/KWT/582, G/TBT/N/OMN/449, G/TBT/N/QAT/603, G/TBT/N/SAU/1219 and G/TBT/N/YEM/210) about the proposed revision to the *Standard for Edible Fats & Oils Not Covered by Individual Standards - GSO 2228/2012*. We only recently learned about this Notification, so we apologize for the delayed feedback and appreciate your consideration of our comments.

From the Notification, GOED understands that it was decided at the 29th Gulf Technical Committee for Food & Agriculture Conference to update the *Standard for Edible Fats & Oils Not Covered by Individual Standards - GSO 2228/2012* according to the updated original reference, which was issued by the Codex Alimentarius Commission and is the *Standard for Edible Fats and Oils not Covered by Individual Standards (CX5 19-1981)*.¹ GOED wishes to inform PAFN that this standard does not apply to the *Standard for Fish Oils*, which is covered by a separate Codex Standard - *CX5 329-2017*.²

GOED, as a recognized Codex Observer,³ was intimately involved in discussions about and adoption of this Standard. Fish oils are unique and including them in the scope of *Standard for Edible Fats & Oils Not Covered by Individual Standards* could have the unintended consequence of creating a trade barrier within the Gulf Cooperation Council (GCC) Member States. For this reason, GOED recommends an update to *GSO 2228/2012* exclude fish oils from the scope.

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

Sincerely,

Harry B. Rice, PhD
Vice-President, Regulatory & Scientific Affairs
harry@goedomega3.com

¹https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCXS%2B19-1981%252FCXS_019e.pdf

²https://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

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