



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

20 October 2022

Thailand Food and Drug Administration

Standards Group

Food Division

88/24 Tiwanon Road

Talat Khwan Subdistrict

Mueang District

Nonthaburi, Thailand 11000

[food.publichearing@gmail.com](mailto:food.publichearing@gmail.com)

link to Google Form

[https://docs.google.com/forms/d/1DEYQRPBWjWUrUwFhQHxquTyIOEbvX-RTfXYEFsK4oQ/viewform?edit\\_requested=true](https://docs.google.com/forms/d/1DEYQRPBWjWUrUwFhQHxquTyIOEbvX-RTfXYEFsK4oQ/viewform?edit_requested=true)

RE: (Draft) Notification of the Ministry of Public Health (No. ...) B.E. .... Issued under the Food Act B.E. 2522 about Fish Oil<sup>1</sup>

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 global consumption of eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA). 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.

Regarding the (Draft) Notification of the Ministry of Public Health (No. ...) B.E. .... Issued under the Food Act B.E. 2522 about Fish Oil, GOED appreciates the opportunity to provide comments, which focus on reference to “anhydrous fat.”

Referring to Clause 7, anhydrous fat is a quality parameter for dairy fats, such as margarines and butters, and should not be included in a standard for fish oils, for which it has no relevance. Humidity in crude fish oils is generally <1%, and in refined fish oils used as ingredients, it is usually much lower than that. A max 5% value suggests that this quality parameter is copied from a standard applicable to another type of oil or fat. The oil and fat content of refined fish oils is nearly 100% (note that for crude unrefined fish oils, it is at least 92%); therefore, the requirement of an oil and fat content of not less than 60-70% does not seem to be of relevance to a standard for fish oils.

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<sup>1</sup>[https://www.fda.moph.go.th/sites/food/FileNews/DRAFT/65\\_Oil/2\\_422.pdf](https://www.fda.moph.go.th/sites/food/FileNews/DRAFT/65_Oil/2_422.pdf)



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GOED suggests removing the mention of anhydrous fat, and if something must be said about humidity and minimum level of oil and fat that the relevant levels are indicated for fish oils.

GOED appreciates your consideration of the above comments and would be happy to answer any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'H. Rice', on a light-colored background.

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

A handwritten signature in black ink, appearing to read 'G. Bannenberg', on a light-colored background.

Gerard Bannenberg, PhD  
Director, Technical Compliance & Outreach  
[gerard@goedomega3.com](mailto:gerard@goedomega3.com)