



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

March 10, 2012

Standards Management Officer  
Food Standards Australia New Zealand  
PO Box 7186  
Canberra BC ACT 2610  
AUSTRALIA

Re: Proposal P293 Nutrition, Health and Related Claims

Dear Standards Management Officer:

The Global Organization for EPA and DHA Omega-3s (GOED) is an association of processors, refiners, manufacturers, distributors, marketers, retailers and supporters of products containing Eicosapentaenoic Acid (EPA) and Docosahexaenoic Acid (DHA) omega-3 fatty acids. GOED's membership represents a broad range of businesses, from small entrepreneurs to multinational food companies. The Organization's objectives are to educate consumers about the health benefits of EPA & DHA and collaborate with government groups, the healthcare community and the industry on issues related to the long-chain omega-3s, while setting high standards for our business sector. As such, our members have a profound interest in ensuring that valuable information regarding the EPA and DHA content of foods is communicated to consumers in a meaningful and timely way. Thus said, GOED applauds FSANZ for clarifying draft Standard 1.2.7 Nutrition, Health and Related Claims and appreciates the opportunity to provide comments on said Standard.

Schedule 1, Conditions for nutrition content claims

- GOED agrees with the criteria listed for the Omega-3 fatty acids, EPA and DHA, as it remains unchanged from the current Standard 1.2.8.

Pre-approval of general level health claims

- GOED agrees with FSANZ's recommendation to include "115 pre-approved food-health relationships in draft Standard 1.2.7, which upon gazettal, will provide food businesses with immediate access to pre-approved food-health relationships from which they can derive health claims."
- GOED agrees with "Food businesses have the opportunity to prepare their own wording of the health claim provided it is consistent with the relevant food-health relationship and meets other requirements and conditions in the standard."
- GOED agrees with FSANZ's proposal "to review the health claims that are expected to be approved by the European Union (EU) and plans to adopt acceptable claims for inclusion as food-health relationships in Standard 1.2.7."
- GOED looks forward to commenting on FSANZ's proposals for the "translation of EU claims into pre-approved food-health relationships."
- GOED supports food businesses being "able to make application to FSANZ for further food-health relationships where they have been established and substantiated. To support industry innovation, food businesses will have the option of having applications for the approval of new food-health relationships assessed confidentially..."



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- GOED agrees with FSANZ's intention of "adding to the list of recognised food-health relationships through periodically translating appropriate food-health relationships into the new Standard that are the basis for health claims published by the EU."

Schedule 2, Conditions for permitted health claims

- GOED agrees with the criteria listed for the Omega-3 fatty acids, EPA and DHA.

Sincerely,

Harry B. Rice  
VP, Regulatory & Scientific Affairs