



GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

27 June 2023

Food Standards Australia New Zealand (FSANZ)

submissions@foodstandards.gov.au

RE: Proposal P1028 – Infant Formula – 2nd Call for Submissions Dated 23 April 2023

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 170⁺ 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.

As Vice-President of Regulatory and Scientific Affairs, I am authorized by the GOED Board of Directors to submit comments on behalf of and in the best interest of the broader membership.

GOED thanks Food Standards Australia New Zealand (FSANZ) for the opportunity to provide comments on Proposal P1028 – Infant Formula – 2nd Call for Submissions. GOED's comments will focus on the nutrient composition of follow-on formula, specifically the optional addition of the fatty acid docosahexaenoic acid (DHA).

GOED recommends that when DHA is added to follow-on formula, a minimum level of 4.8 mg/100 kJ (20 mg/100 kcal) should be reached. Note that we are not recommending a mandatory addition of a minimum level of DHA. This level corresponds to what CCNFSDU43¹ agreed to forward to CAC46 for adoption at Step 5/8 for follow-up formula for older infants (6-12 months of age). The text from the report has been provided below for your reference.

Docosahexaenoic acid²¹⁾

Unit	Minimum	Maximum	GUL
mg/100 kcal	-	-	30
mg/100 kJ	-	-	7

²¹⁾ If docosahexaenoic acid (22:6 n-3) is added to follow-up formula for older infants, a minimum level of 20 mg/100 kcal (4.8 mg/100 kJ) should be reached, and arachidonic acid (20:4 n-6) contents should reach at least the same concentration as DHA. The content of

¹https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-720-43%252FFinal%252BReport%252FREP23_NFSDUe.pdf



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eicosapentaenoic acid (20:5 n-3), which can occur in sources of LC-PUFA, should not exceed the content of docosahexaenoic acid. Competent national and/or regional authorities may deviate from the above conditions, as appropriate for the nutritional needs of their population.

Thank you in advance for consideration of our comments.

Sincerely,

