

03/08/2016

## European Union comments on

### CL 2015/23-FO:

## Request for comments at Step 6 on the Draft Standard for Fish Oils

*Mixed Competence  
European Union Vote*

The European Union and its Member States would like to submit the following on CL 2015/23-FO - Draft Standard for Fish Oils.

### 7.3 Other labelling requirements

This section contains two options for the specific labelling of vitamin A and vitamin D. **The second option is preferred** because it offers flexibility as to the different requirements for retail sale.

This section contains two options for the labelling of the content of EPA and DHA (obligatory/optional). **The first option (obligatory) is preferred**. EPA and DHA are the most valuable constituents of fish oils. According to Table 1 of the draft standard the EPA and DHA contents may vary over a rather broad range. This is valuable and essential information for the consumer about the real content of EPA and DHA in the different fish oils. It should therefore be safeguarded in order to ensure that consumers can make informed choices.

### 8.2 Determination of fatty acid composition

The standard ISO 5508 has been recently replaced by ISO 12966-1 and 12966-4. At present gas chromatography of fatty acid methyl esters in animal and vegetable fats and oils is covered by 4 parts of ISO 12966. This section should therefore be amended as follows:

"According to applicable ISO methods including: ~~ISO 5508 and ISO 12966-2~~, **ISO 12966** (Animal and vegetable fats and oils - Analysis by gas chromatography of methyl esters of fatty acids)..."