



Seafood Inspection Program  
U.S. Department of Commerce  
National Oceanic & Atmospheric Administration  
1315 East West Highway  
Silver Spring, MD 20910



July 15, 2022

MEMORANDUM TO: Seafood Inspection Program Users and Personnel

FROM: Steven Wilson  
Chief, Seafood Inspection Program  
Office of International Affairs, Trade, and Commerce

SUBJECT: Certifications for Fish Oil Dietary Supplements  
Update from April 11 and 28, 2022 Memos

This memo serves as official notification from the National Oceanic and Atmospheric Administration (NOAA) Seafood Inspection Program (SIP) to update stakeholders on previously announced plans to suspend certification of encapsulated fishery product oils identified as dietary supplements or intended for human consumption. SIP had previously indicated on April 11 that it would suspend its role in encapsulated fish oil certification as of May 1, 2022 and defer to other agencies with a role in regulating and certifying dietary supplements. To avoid a disruption in trade, SIP extended the deadline to August 1, 2022 in a communication dated April 28, 2022. NOAA continues to consult with other agencies with relevant authorities related to certification of dietary supplements. This notice serves as notification that SIP will not cease certification on August 1, 2022 for products that meet certain criteria, unless and until otherwise notified.

NOAA seeks to support the continued trade in legitimate products to support industry stakeholders and consumers, while also ensuring that SIP has adequate information to make accurate attestations and is able to maintain continued integrity in certification processes for trade with other countries. SIP is the competent authority to certify the fish oil ingredient as a fishery product. To ensure consistency and clarity on this process, SIP intends to certify fish oil capsules for export where firms are able to satisfy the following initial criteria:

- Fish oil must be traceable to the harvest location. Firms requesting certification will be asked for documentation that provides this traceability.
- The species of the fish oil ingredient must be declared.
- If fish oil is not the only ingredient, the net weight or percentage of fish oil must be provided.
- No other oils may be used in the product (for example, canola oil).
- For exports to the European Union, all firms involved in the process must be EU listed as approved (vessels, trampers, processors, encapsulation firms, and storage).
- Labels must declare the product as fish oil. For example, declaring the product as Omega 3 fatty acids with fish oil in the ingredient statement will not be sufficient.

SIP will continue to communicate with users and personnel as requirements evolve, interagency roles and responsibilities are clarified, and if it becomes necessary to change certification processes or suspend certification. SIP may consider future requirements to ensure integrity in the certification process, such as whether oils sourced entirely from foreign countries should be eligible to receive SIP certification for export; whether firms involved in this process should become SIP approved establishments in the Seafood

Inspection Program, especially U.S. based encapsulation plants; end-item product testing by SIP; and the language to be used regarding the certification of the oil or the entire capsule.

Approved Establishments under the Seafood Inspection Program will continue to be able to gain certification for bulk shipments when product lots are identified as processed under the SIP controls. SIP continues to enhance the certification process of encapsulated fish oils and will continue discussions with other federal agencies and trading partners to support trade and compliance with related requirements.

Please contact your local SIP Regional Office for updates on product exports and certification requests.