

**National Organic Standards Board
Handling Subcommittee
Fish Oil CAS Technical Correction Proposal
January 7, 2025**

Summary of Issue

A public commenter identified an apparent error in the fish oil listing at 7 CFR 205.606. The listing includes two fatty acid CAS numbers (10417–94–4 and 25167–62–8); however, fish oil itself does not have a CAS number. The Handling Subcommittee recommends deleting the CAS numbers, as a technical correction to the listing, to avoid confusion.

Background

In response to petition question 8 regarding CAS numbers, the [2007 petition](#) to add fish oil to the National List stated, “The 18/12TG fish oil that is the subject of this petition is a mixture of fatty acids; therefore, no Chemical Abstracts Service (CAS) Registry Number exists for this substance. The CAS Registry Numbers for EPA and DHA, the primary components of this product, are 10417-94-4 and 25167-62-8, respectively.”

The [2007 NOSB recommendation](#) to add fish oil to the National List only recommended adding “fish oil” to 7 CFR 205.606. However, the [2007 interim final rule](#) added the current listing, “Fish oil (Fatty acid CAS #'s: 10417-94-4, and 25167-62-8)—stabilized with organic ingredients or only with ingredients on the National List, §§ 205.605 and 205.606.”

During the 2024 sunset review of fish oil, the NOSB received a public comment that noted the CAS numbers in the listing are incorrect.

Discussion

The Subcommittee appreciates the public comment that brought this issue to the NOSB’s attention. Upon review, it appears that the CAS numbers included in the listing describe individual components of the fish oil, but not fish oil itself, and were included in the listing in error. Since the listing is for fish oil, and the NOSB’s recommendation was to add fish oil, not its individual components, to the National List, the Subcommittee recommends removing the CAS numbers as a technical correction to the listing.

Subcommittee Motion:

Motion to eliminate the CAS numbers included in the fish oil listing at 7 CFR 205.606, as a technical correction, so it reads: “(f) Fish oil—stabilized with organic ingredients or only with ingredients on the National List, §§ 205.605 and 205.606”

Motion by: Allison Johnson

Second by: Dilip Nandwani

Yes: 8 No: 0 Abstain: 0 Recuse: 0 Absent: 1