



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

April 10, 2025

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Docket ID # AMS-NOP-24-0081

Re. HS: Fish oil CAS Number

These comments to the National Organic Standards Board (NOSB) on its Spring 2025 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers, and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

The Handling Subcommittee (HS) is correct that fish oil should not be identified by Chemical Abstract Service (CAS) numbers of component fatty acids. However, it is mistaken in believing that there is no CAS number for fish oil. CAS says, "A CAS Registry Number is a unique and unambiguous identifier for a specific substance that allows clear communication and, with the help of CAS scientists, links together all available data and research about that substance."¹ CAS numbers are assigned not only to pure substances, but also to compound materials and "those of unknown or variable composition."² The CAS Registry gives fish oil the CAS number 8016-13-5.³ The CAS number can also be found in other sources, including PubChem.⁴

We suggest that the listing be corrected by assigning fish oil the CAS number 8016-13-5.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors

¹ <https://www.cas.org/cas-data/cas-registry>.

² <https://www.cas.org/cas-data/cas-registry>.

³ https://commonchemistry.cas.org/detail?cas_rn=8016-13-5.

⁴ <https://pubchem.ncbi.nlm.nih.gov/source/hsdb/5149>.