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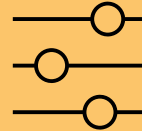
**VIEWS ON  
MINERAL OILS  
HYDROCARBONS**

18 January 2024

# Overview



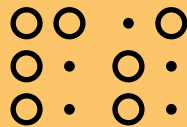
Lack of analytical methods



Unclear scope and impact



Lack of transition period



Incoherency with EFSA Opinion



Fedima products



Unnecessary MOSH guideline

# Lack of analytical methods

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**Robust, validated and EU approved analytical methods** excluding the impact of naturally occurring Mineral Oil Hydrocarbons, are necessary for laboratories to perform a data collection to show which food products comply or not with the limits.

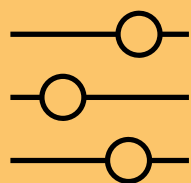
- Such methods **do not currently exist for bakery products** considering matrix complexity of these products.
- Analytical methods being used by labs have **different LOQs that also vary per type of matrix.**
- In the absence of such methods, laboratories cannot provide realistic results.

**It is necessary to have validated analytical methods before setting MLs.**

Applicability of **measurement uncertainty needs to be clarified** and the **same approach** followed by all Member States.

# Unclear scope and impact

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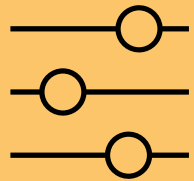
**Further clarifications are required from the Commission regarding the options proposed:**

Our understanding is that in Option 2 “all foods” covers all food, at all stage of the chain (from raw materials to finish products).

Option 1 scope is also unclear, namely if it refers to raw materials, finish products, others, as also in which food category a food would be classified.

# Unclear scope and impact

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Necessary to clarify both options' scope interpretation, including targeted food categories, and bring clarification on application to B2C and/or B2B, and **what is intended for B2B products**

**Impact assessment must be conducted for both clarified options.**

# Lack of transition period

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**Necessary to take the time to complete discussion and include a transition period**

2022 statement not legally binding and has been applied differently by MS. This results already in cross MS trading issues.

No transition period means for regular products with 12 months shelf life, FBOs **should have been compliant last year** already.

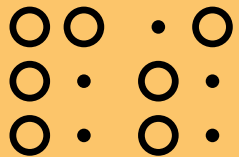
# Incoherency with EFSA opinion

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Draft regulation is **not in line with EFSA scientific report** that underlines the importance of 3+rings of MOAH instead of the sum of total MOAH

Discussion papers **partially take over** elements of the official EFSA article DOI:10.2903/j.efsa.2023.8215 **omitting important nuances** e.g., reference to the presence of MOH in mineral oil based release agents 30 y ago in the USA and the potential risk for bakery wares in EU nowadays

Additionally, in the EFSA article **conflicting conclusions** are drawn (see notes)



# Fedima products

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Fedima members products are produced in accordance with **HACCP and GMP principles.**

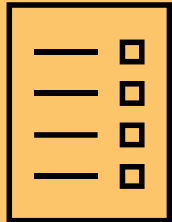
Mitigation of MOH needs to occur at raw material level.

If certain raw materials will have specific MLs defined then this will need to be reflected in intermediate and finished products using such raw materials otherwise risk of such products exceeding MLs defined on those products.



# Unnecessary MOSH guideline

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Unclear the basis for the setting of the indicative levels of MOSH.

Level proposed are lower than the one set by some Member States for some food categories.

European Food Safety Agency (EFSA) recent Opinion on mineral oils reiterates that **present dietary exposure to MOSH does not pose risk for human health.**



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Thank you!

