



UPCOMING NEW EU RULES ON MINERAL OIL HYDROCARBONS

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AGRINFO

TODAY'S WEBINAR



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- ❑ Brief introduction to AGRINFO programme
- ❑ Part I: EU's approach to mineral oil hydrocarbons (MOH) in food
 - Why EU action on MOH?
 - The rules today
 - Future maximum levels under discussion
 - Next steps & timeframe
- ❑ Part II: Preparing for MOH maximum levels
 - Potential risk to trade
 - Sources of contamination
 - Practical mitigation strategies
 - Analytical challenges
- ❑ Questions and some answers

Further questions? e-mail: agrinfo@colead.link

IN BRIEF

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TOWARDS A FAIR, HEALTHY AND ENVIRONMENTALLY FRIENDLY FOOD SYSTEM: SUPPORTING COMPLIANCE WITH EU REGULATORY AND NON-REGULATORY MEASURES



Implemented by COLEAD, a Brussels-based not-for-profit private sector organization that manages development programmes in the agriculture and food sector (mainly in ACP States) funded by donors, amongst which the EU is the most important.

An open access portal: www.agrinfo.eu that provides up-to-date information on all recent and upcoming changes to EU rules that have an impact on agri-food and fish value chains

While AGRINFO is an EU-funded programme, this presentation does not reflect the views of the European Commission

WHY AGRINFO?

Monitor

EU introduces approx.
180 new or changes
to agrifood rules
every year

Consolidate



Simplify

provides clear,
accessible
explanations of what
rules are changing,
why and implications


KEEPING TRACK OF EU RULES

- ❑ every two weeks an Update newsletter; subscription is free: <https://agrinfo.eu/subscribe>
- ❑ provides information as early as possible to allow maximum time for exporting countries to adjust to changes
- ❑ detailed guides & webinars on key topics
- ❑ will respond to requests for further information on regulatory changes: <https://agrinfo.eu/ask-agrinfo/>





LATEST

New Regulations or policies under development


 **Sustainability/Due diligence**
European Commission launches review of:


- [Corporate Sustainability Due Diligence Directive](#)
- [Corporate Sustainability Reporting Directive](#)

 **Common Agricultural Policy**
European Commission sets out its Vision for Agriculture and Food for 2025–2029 [Read](#)

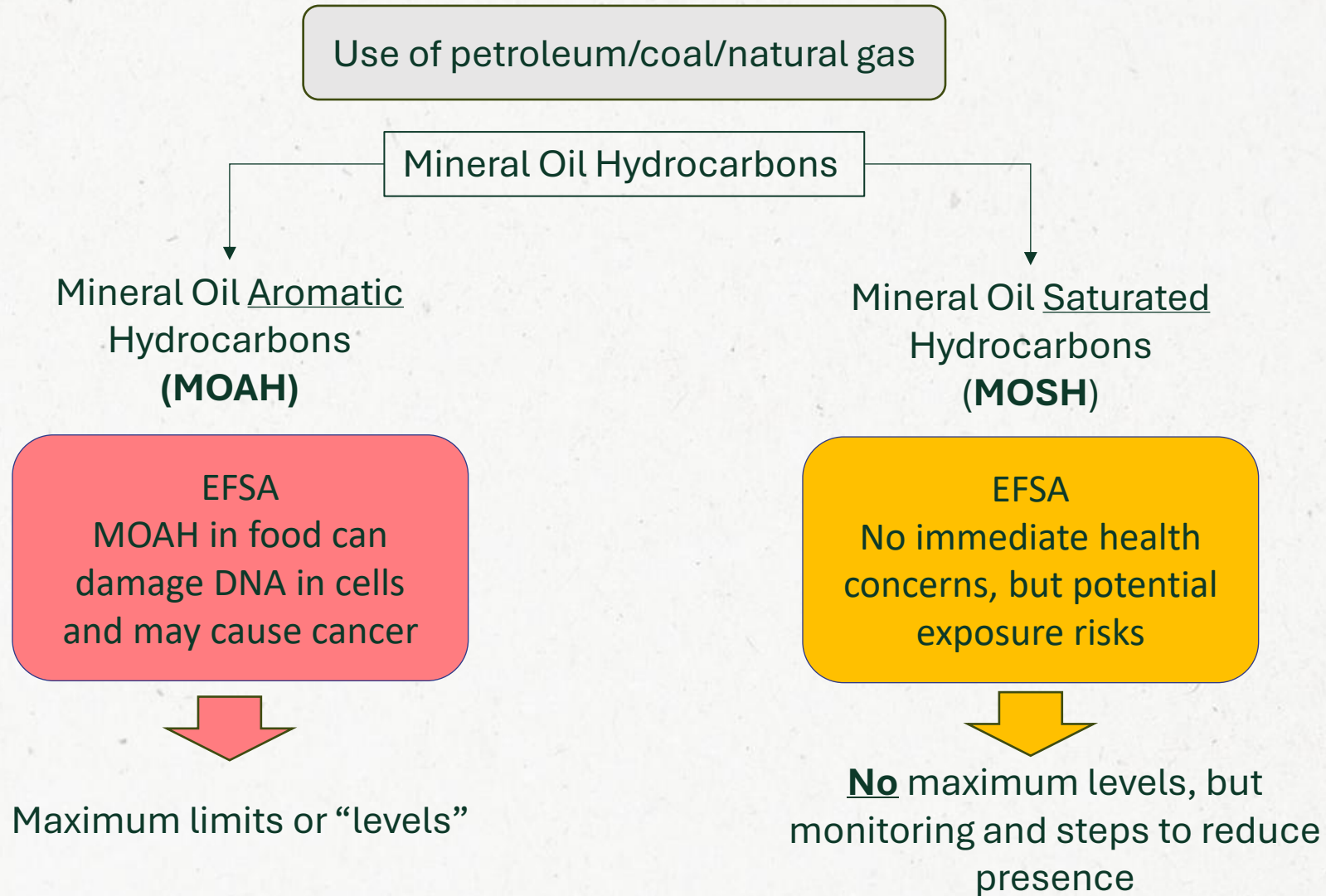
 **Common Fisheries Policy**
EU and Côte d'Ivoire Fisheries Partnership Agreement – allocation of fishing opportunities [Read](#)

New Regulations coming into force and application dates

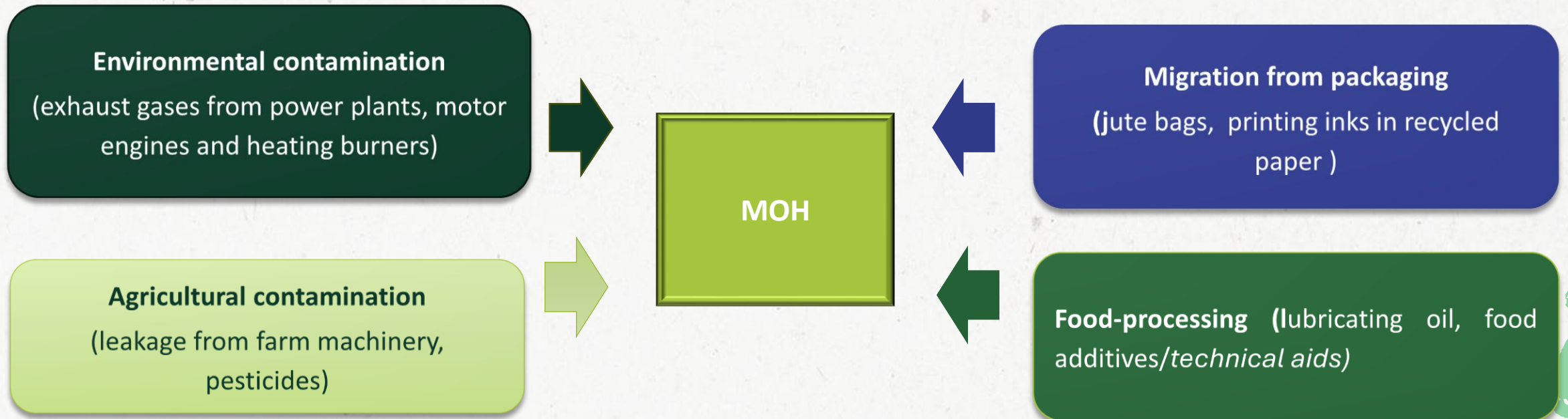
 **Food safety controls**
European Commission updates the list of countries that can export animal products to EU. Affected countries: Armenia, Belize, Brazil, Costa Rica, Cuba, Honduras, Kazakhstan, Nigeria, Tanzania, Thailand, Tunisia. Applies from **16 March 2025** [Read](#)

 **Plant health controls**
EU updates frequency rates of import controls for certain plants. Applies from **1 March 2025** [Read](#)

Why EU action on mineral oil hydrocarbons?



Sources of mineral oil hydrocarbons



The rules today

- No maximum levels
- **But** all food on the EU market must be safe*
- In light of the EFSA evaluation, Commission/ Member States agree common approach to managing MOAH in food**
- EU Member States to take action e.g. withdraw, and if necessary, recall products where they detected levels of MOAH in food > Limit of Quantification (LOQ)



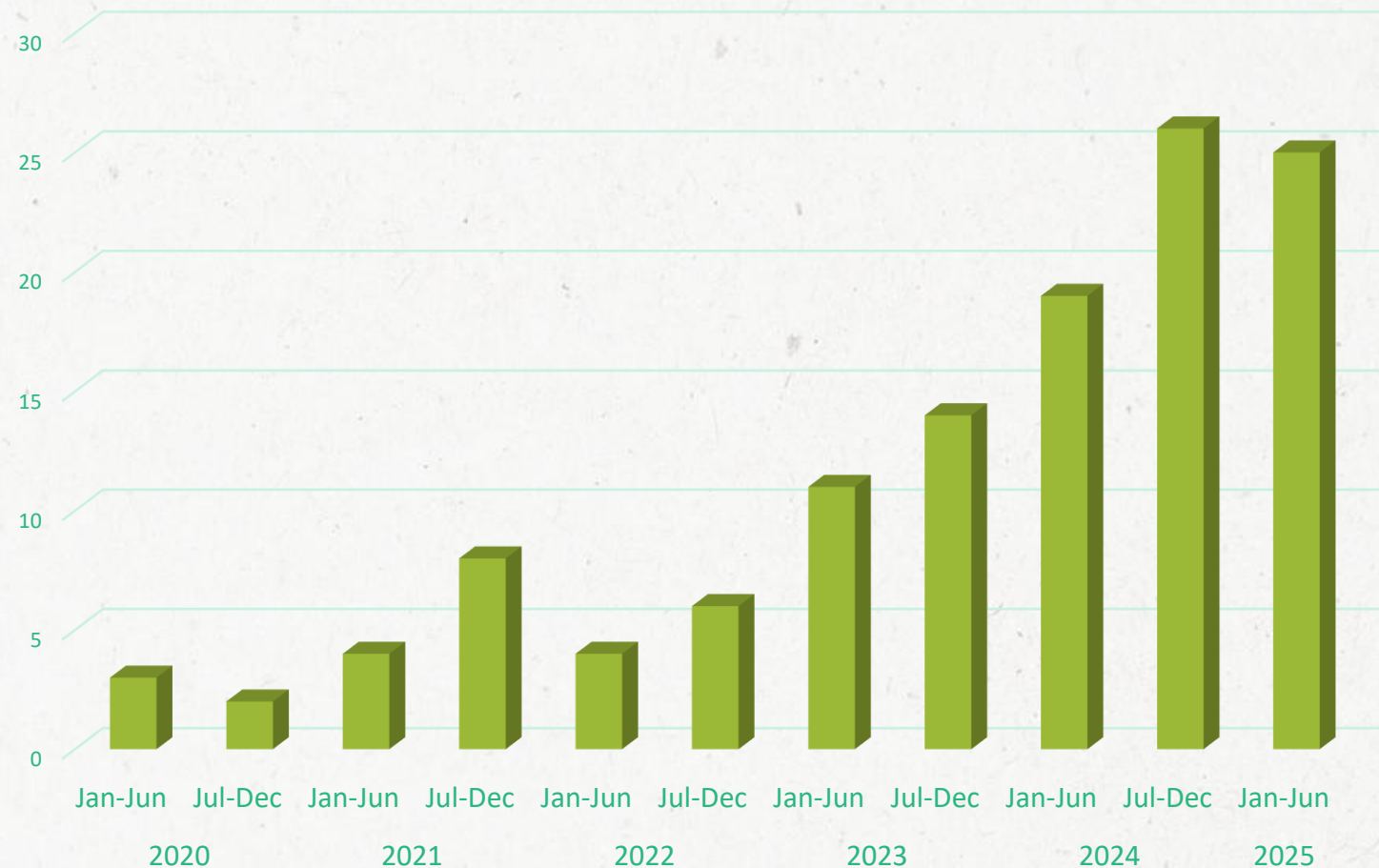
- **0.5 mg/kg** for dry foods with a low fat/oil content ($\leq 4\%$ fat/oil)
- **1 mg/kg** for foods with a higher fat/oil content ($> 4\%$ fat/oil, $\leq 50\%$ fat/oil)
- **2 mg/kg** for fats/oils or foods with $> 50\%$ fat/oil

*Article 14 of General Food Law (Regulation [178/2002](#))

** Statements of the Standing Committee Plants, Animals, Food and Feed ([June 2020](#), [April 2022](#), [October 2022](#))

Today: already potential risk of trade problems

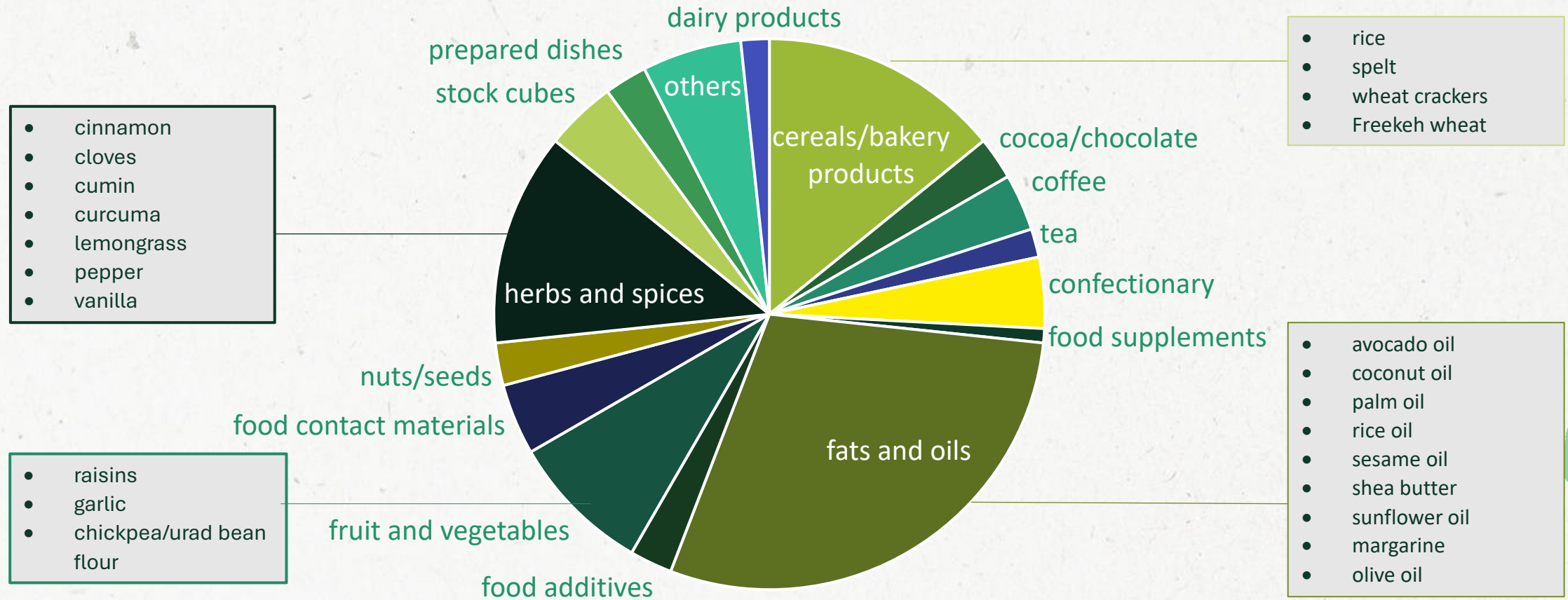
Number of Rapid Alert System for Food and Feed (RASFF) notifications (all foods) on MOH (2020 - 2024)



Increase in controls and findings of MOH

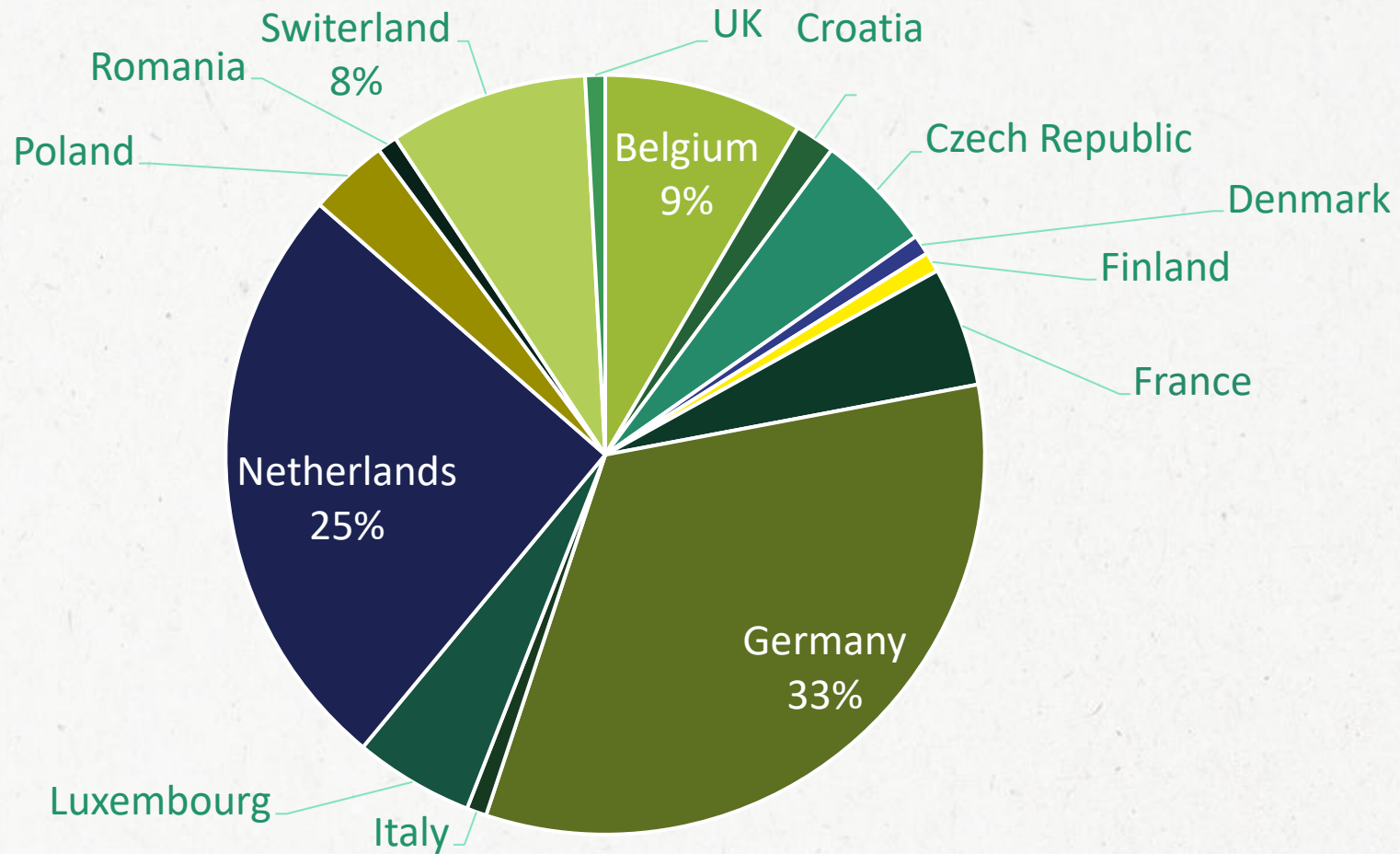
In which products have MOH been found?

Products that have been subject to RASFF notifications 2020-2025



Which countries have reported MOH findings?

Countries reporting RASFF notifications on MOH 2020-2025



The maximum levels under discussion to apply from 2027 (target date)

Maximum levels under discussion 'As Low As Reasonably Achievable', generally Limit of Quantification (LOQ) on:

- Oilseeds and oil fruits
- Animal or vegetable fats/oils (**temporary MLs > LOQ until 2030 for some**)
- Tree nuts*
- Pulses
- Cereal grains including rice and products derived from cereals
- Milk and dairy products**
- Cocoa beans***, cocoa mass, cocoa powder, cocoa and chocolate products and other confectionary
- Infant formula/baby foods/cereal based foods for infants and young children



- **0.5 mg/kg** for dry foods with a low fat/oil content ($\leq 4\%$ fat/oil)
- **1 mg/kg** for foods with a higher fat/oil content ($> 4\%$ fat/oil, $\leq 50\%$ fat/oil)
- **2 mg/kg** for fats/oils or foods with $> 50\%$ fat/oil content

* Almonds, Brazil nuts, cashew nuts, chestnuts, coconuts, hazelnuts, macadamias, pecans, pine kernels, pistachios, walnuts.

** Exception for butter: 2 mg/kg whatever the fat content.

*** The ML applies to the edible part.

The maximum levels under discussion to apply from 2027 (target date)

- ❑ **For certain animal or vegetable fats/oils:** further investigations required to identify measures to reduce MOAH, with maximum levels reduced over time

Oil from	From			
	01/01/27	01/01/28	01/01/29	01/01/30
Maize, rapeseed, sunflower, soybean, linseed	2.0			
Groundnut, sesame, coconut, cereal germ	6.0	4.0		2.0
Grapeseed, cottonseed, blackcurrant seed, argan	10.0	5.0		2.0
Olive pomace		10.0	5.0	2.0
Fishery product/algae	10.0			5.0
Other oils/fats not listed above	4.0	2.0		

The maximum levels under discussion to apply from 2027 (target date)

- ❑ **Spices, dried herbs, tea and herbal infusions that are used as an ingredient in food, dry instant coffee/tea and dry instant herbal infusions:** ML under discussion at the LOQ of 5 mg/kg (reflecting analytical complexity)

- ❑ **Food supplements:** MLs under discussion at the LOQ by 2030 (reflecting analytical complexity)
 - 10 mg/kg from 01/01/27
 - 5 mg/kg from 01/01/30

- Products exceeding the MLs cannot be placed on the market in the EU.
- Investigations must be carried out to identify the source of the contamination

What about other products with no MLs?

No maximum levels are under discussion for **fresh or frozen fruits, vegetables, meat, offal, fish and seafood, coffee and tea and herbal infusions for making a brew**, as not significant sources of MOAH.

For **processed foods (vegetables, fruits, eggs, meat, offal, fish and seafood) and essential oils** insufficient data available to establish need for MLs.

Indicative levels for MOAH (1,0 -10,0 mg/kg) are under discussion for some of the above:

- Where indicative levels are exceeded, Member States and operators will be recommended to investigate the sources of concentration:
 - sample and analyse the products
 - investigate the source of contamination
 - report on the outcome of the investigations by operators
- However, these foods may generally be placed on the EU market
- Further monitoring in particular of processed foods (typically higher levels of contamination).
- The EU may set maximum levels in the future if collected data show a need



Impact of establishing maximum levels in the EU law?

- ❑ Clearer rules with specific levels for specific products
- ❑ Probable increase in controls of MOH across the EU
- ❑ More consistent approach to enforcement, non-placement on the market of foods containing MOAH
- ❑ Increased demands from European companies to suppliers of evidence of compliance with MOAH maximum levels

EU MOAH maximum levels: next steps

Target timeframe



WTO country members can submit comments, via the [National SPS notification authority](#) of the country concerned, to the [EU SPS Enquiry Point](#) within 60 days of notification

What about MOSH?

- No maximum levels are under discussion
- Current exposure does not raise health concerns, but any increase in the exposure of EU consumers to MOSH would be a concern
- EU Member States will therefore be encouraged to continue to monitor MOSH
- Indicative levels are under discussion for MOSH: Member States to carry out investigations where levels exceed indicative levels:
 - to determine sources of contamination
 - assess the systems in place to avoid MOH contamination
- Products not to be removed from market



Product	Indicative level mg/kg
Olive/grapeseed/blackcurrant/cottonseed/cereal germ/essential oil and oil from fishery products/algae	50 mg/kg
Linseed/maize/rapeseed/sunflower/soybean oil/cocoa butter	15 mg/kg
Other animal and vegetable oils	30 mg/kg
spices, dried herbs, tea, herbal infusions, food supplements	15 mg/kg
Cocoa beans, cocoa and chocolate products, other confectionary, processed meat and offal, processed fish/seafood, processed eggs	10 mg/kg
Oilseeds/fruits, tree nuts, pulses, cereals, milk, dairy, coffee beans, eggs, dry infant formula, baby foods, cereal based foods for infants and young children, processed vegetables, processed fruits	5 mg/kg
Liquid infant formula	1.0 mg/kg

Further information

[https://agrinfo.eu/documents/56/AGRINFO - Mineral Oil Hydrocarbons in Food 2024-cc NnhGSbc.pdf](https://agrinfo.eu/documents/56/AGRINFO_-_Mineral_Oil_Hydrocarbons_in_Food_2024-cc_NnhGSbc.pdf)

GUIDANCE

MINERAL OIL HYDROCARBONS IN FOOD

AN INTRODUCTION TO UPCOMING EU REGULATION

Version 2.0
JUNE 2025



2. WHY REGULATE?

The primary focus of EU regulators is on mineral oil aromatic hydrocarbons (MOAH). These can contain genotoxic substances that can damage DNA in cells and may cause cancer.³ Therefore the basic aim is to eliminate MOAH from the food chain. This means they should be undetectable (lower than the limit of quantification, LOQ).

Current exposure to mineral oil saturated hydrocarbons (MOSH) does not raise concerns for human health, but there is uncertainty about their long-term accumulation.³ As increased levels of MOSH could potentially be a risk, levels in food should be kept low.

EU action on MOH in food is not new. Over time, the EU has gradually been stepping up initiatives to reduce risks associated with MOH (see Timeline below).

EU Action on MOH - Timeline

- 2012** EFSA concludes that some MOAH are considered mutagenic and carcinogenic, and more monitoring of foods is required.
- 2017** European Commission recommends that EU Member States and food businesses submit monitoring data to EFSA to establish a single database (Recommendation (EU) 2017/84).
- October 2019** Foodwatch publishes a [report](#) showing a quantified presence of MOAH in 16 different baby milk products from different EU Member States.
- June 2020** EU Member States approve a [Joint Statement](#) agreeing to take measures where MOAH exceed 1 mg/kg per MOH C-fraction in infant formula and follow-on formula. ([Statement of June 2020](#)).
- December 2021** Foodwatch published a [report](#) on mineral oils in a range of processed foods.
- April and October 2022** The EU Member States agree to take enforcement action (market withdrawals and, if necessary, market recalls) against concentrations of MOAH in all foods at levels above the agreed limits of quantification ([Statement of April 2022](#) and [clarifications of October 2022](#)).
- July 2023** EFSA publishes its updated [risk assessment](#) on MOH.
- Last quarter 2023** EU Member States start work on establishing maximum levels based on EFSA risk assessment.

ANNEX I

Overview of the number of samples with data on MOAH analysed by EFSA (EFSA risk assessment of mineral oil hydrocarbons in food, Table 9)

