

QUESTIONS AND ANSWERS

**Upcoming EU rules and
recommendations on
mineral oil hydrocarbons
(MOH)**

QUESTIONS ARISING FROM
AGRINFO WEBINARS (JUNE 2026)

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Please note that the European Commission has published a revised [Frequently Answered Questions document](#) (version 3) on mineral oils in food.

Below we seek to provide further clarity on questions that were raised during AGRINFO webinars held in June 2026.

A. General questions

Q1: Where can we find a copy of the upcoming Regulation, monitoring recommendations, and the European Commission's FAQs?

The texts of the upcoming Regulation on mineral oil aromatic hydrocarbons (MOAH) maximum levels (MLs), the Regulation on sampling methods and analysis, the recommendations on monitoring MOH, and the FAQs can be found on the European Commission webpage [Mineral Oil Hydrocarbons \(MOH\)](#).

Q2: Are the Regulations on the European Commission website the final version, or are further revisions expected?

These texts on the Commission website are the final versions.

Q3: For organic products, are there different maximum or indicative levels for MOSH/MOAH?

The MLs for MOAH and the indicative levels (ILs) for mineral oil saturated hydrocarbons (MOSH)/MOAH are the same for organic and non-organic products.

Q4: What is the exact definition of "MOAH"?

MOAH in this Regulation refers to **total** mineral oil aromatic hydrocarbons. No distinction is made between 1 and 2 aromatic rings and MOAH with 3- or more aromatic rings.

Q5: Do the new maximum levels apply only to imported food?

The MOAH MLs and MOSH/MOAH ILs apply to all food placed on the European Union (EU) market, whether produced within or outside the EU.

Q6: If analytical techniques develop in the coming years, will LOQs and maximum levels be reduced?

The principle underlying the setting of contaminant levels is that they should be "as low as reasonably achievable" (ALARA). As analytical testing of MOAH is expected to evolve, it cannot be excluded that lower limits of quantification (LOQs) will be reasonably achievable, and that MLs will therefore be lowered. No timetable for reviewing the Regulation is currently foreseen. (The LOQ is the lowest concentration of a substance that can be measured with certainty using standard tests.)

Q7: Will the European Commission consider the review of maximum levels if experience demonstrates that these levels cannot technically be achieved?

The MOAH MLs and MOSH/MOAH ILs have been set taking into account the levels that are achievable when applying good practices in the food chain, as well as analytical feasibility.

Q8: Can products containing MOAH above the levels established by the EU be exported to non-EU countries that do not have MOAH maximum levels?

Food that is not compliant with EU rules can sometimes be exported to non-EU countries if the authorities of the importing country are fully aware of why the product may not be placed on the EU market, and explicitly agree to its import (Regulation [178/2002](#), Art. 12). However, this possibility does not apply if the EU Member State considers the food to be “injurious to health” ([Guidance](#) on Regulation 178/2002, p. 33).

Q9: Do maximum levels on compound foods apply only to foods sold directly to the final consumer, or do they also apply to foods sold for further processing (business-to-business, B2B)?

If a compound or processed food is sold to a food business operator for further processing, it is placed on the EU market and must also be compliant with EU MOAH MLs.

Q10: Who are the monitoring recommendations for? EU Member State control authorities, or businesses?

The monitoring recommendations are directed at EU Member States in collaboration with food business operators, as effective monitoring requires such collaboration. It is therefore recommended that food business operators implement the monitoring recommendations.

Q11: Does “fat content” in the Regulation refer to crude fat, or total fat?

“Fat content” refers to total fat. The determination of fat content is performed in accordance with Association of Official Agricultural Chemists (AOAC) Official method 963.15.

B. Scope – which products have maximum levels?

Q12: How do we know which products fall within the categories listed in the upcoming Regulation? For example, do peanuts fall under “oilseeds”? Is vanilla a “spice”?

The categories tree nuts, cereals, oilseeds and spices are defined in Annex I to Regulation [396/2005](#).

Q13: Why have maximum levels (MLs) been set for some foods, and indicative levels (ILs) for other foods?

MLs have been set for products where existing data shows that MOAH contamination occurs, and where there is sufficient data to set MLs. For other foods where MOAH contamination is known to occur, but for which there are insufficient data to set MLs, ILs have been set.

Q14: Are there maximum levels for food contact materials such as packaging and lubricants?

Food contact materials do not fall under the scope of the upcoming Regulation on MLs for MOAH in food, and no limits are currently set for MOAH under the EU legislation on food contact materials. However, discussions on setting MLs for food contact materials are ongoing.

Q15: Are there maximum levels for foods (e.g. fats) destined for animal feed?

The MOAH MLs under the upcoming Regulation do not apply to animal feed.

C. Enforcement

Q16: What is the legal basis for an EU Member State to remove products from the market if there is no maximum level set in EU law?

Under the General Food Law (Regulation [178/2002](#), Art. 14), food placed on the EU market must be safe. Member States must withdraw or recall products that are not considered to be safe.

Q17. Why have no maximum levels or indicative levels been set for certain foods, and how will these be treated by control authorities?

MOAH contamination largely comes through processing, so for certain foods, such as fresh fruit and vegetables, fresh meat, seafood, and eggs, contamination is not expected. On 13 May 2026, the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) adopted a [Joint Statement](#)¹ providing enforcement guidance in relation to foods for which no MLs have been set. Such foods could be withdrawn or recalled from the market if they are found to contain MOAH above the LOQ (indicating an unusual level of contamination) and, following a national risk assessment, control authorities consider that the products are a risk to the consumer. However, control authorities are not recommended or expected to focus MOAH controls on such products.

Q18: What maximum levels will control authorities be enforcing between now and 1 January 2027?

As indicated in the SCoPAFF [Joint Statement](#) of 13 May 2026, the MLs for certain foods agreed by EU Member State authorities, which will apply from 1 January 2027, will be used as a basis for enforcement before that date (see Q16).

Q19: If a product is shipped to the EU before 1 January 2027 and arrives in the EU after that date, do the MOAH maximum levels apply to that product?

Any product arriving in the EU after 1 January 2027 must comply with the MLs.

Q20: Does the 1 January 2027 date apply only to final products sold to consumers, or also to imported raw materials?

The MLs apply whether the food is imported as a raw material for further processing, or as a final product to be sold to the consumer.

Q21: Will the EU require MOAH analysis for every consignment of the products for which maximum levels are set?

The EU does not require MOAH analysis of every consignment of products. Food businesses are expected to identify and address sources of contamination, taking those measures (including analysis) that are most relevant to their specific products, and that will ensure compliance when those products are placed on the EU market.

¹ SCoPAFF (2026) [Joint Statement](#) regarding the Commission Regulation amending Regulation (EU) 2023/915 as regards maximum levels of mineral oil aromatic hydrocarbons in food adopted by the Standing Committee on Plants, Animals, Food and Feed, section Novel Food and Toxic, 13 May.

Q22: Where the presence of MOAH/MOSH exceeds the recommended indicative levels, what should EU Member State control authorities do?

Where products contain MOSH/MOAH that exceed ILs, Member States are recommended, in collaboration with food business operators, to undertake follow-up investigations to find the sources of contamination. Once the contamination sources are identified, measures should be taken to avoid further contaminations. Products exceeding the ILs may be placed on the EU market unless the control authorities consider that the product is a risk to consumers, following a national risk assessment.

Q23: Is there a risk that different EU Member States could reach different conclusions about the same product?

EU Member States do have some discretion in determining whether products are safe. The agreement reached among Member States and set out in the SCoPAFF [Joint Statement](#) of 13 May 2026 is intended to help harmonise the approach taken to MOAH enforcement.

Q24: As acceptable daily intakes, acute reference doses, and thresholds of toxicological concern are not set for MOAH, how will EU Member State control authorities undertake a case-by-case risk assessment of products exceeding the indicative levels?

Part of the MOAH fraction consists of genotoxic carcinogens, for which there is no safe threshold for exposure. Therefore, EU Member States can consider any food with levels of MOAH above the LOQ to be unsafe (see Q16).

Q25: Will the SCoPAFF statements be revoked when the new Regulation is applicable?

The SCoPAFF [Joint Statement](#) of 13 May 2026 (which refers to a previous 2022 [Joint Statement](#)²) will not be revoked as it provides guidance on the enforcement approach to be taken in relation to products for which no MLs are set. However, control authorities are not recommended or expected to focus MOAH controls on products for which no MLs or ILs are set.

Q26: For some products, the MOAH indicative levels are higher than the LOQs referred to in the 2022 SCoPAFF Joint Statement. For these products, which threshold will EU Member State control authorities enforce?

It is up to the discretion of the EU Member States to decide, based on an *ad hoc* risk assessment, whether they will withdraw and, if necessary, recall from the market a product that exceeds the IL or the LOQ for MOAH and is considered to be unsafe (see Q16).

D. Compound foods

Q27: What is the difference in approach for processed and compound foods, before and after 2030?

Until 1 January 2030, the MLs for compound and processed foods are calculated taking into account the MLs of the ingredients/ raw materials used in the food; the quantity of those foods in the final product; the LOQ for the food; and any processing factors (changes in concentration of MOAH resulting from dilution or concentration during processing) (Regulation [2023/915](#), Art. 3).

² SCoPAFF (2022) [Joint Statement](#) of the Member States regarding the presence of Mineral Oil Aromatic Hydrocarbons (MOAH) in food, including food for infants and young children, 21 April.

After 1 January 2030, specific MLs for compound and processed foods will apply depending on the fat/oil content of the food, as follows:

- <4% fat/oil content: 0.50 mg/kg
- ≥4% and ≤50% fat/oil content: 1.0 mg/kg
- >50% fat/oil content: 2.0 mg/kg.

From 1 January 2030, other specific MLs will apply for compound and processed foods containing ≥15% spices, and/or dried herbs, and/or dry tea (see Regulation [2023/915](#), category 5.5.14).

Q28: How should maximum levels from compound and processed foods be calculated until 31 December 2029?

If a food contains multiple ingredients, some with and some without MLs, the ML of the compound food depends on the quantities of ingredients (see example in Table 1).

Table 1. Calculation of MOAH maximum levels in compound and processed foods: example of grilled paprika in oil

Product	Maximum level (mg/kg)	Maximum level × proportion of ingredient (mg/kg)
Sunflower oil (20%)	2.0	0.40
Paprika (80%)	No maximum level set	0

As the LOQ for a product with 20% fat content is 1.0 mg/kg, and $0.40 < 1.0$ mg/kg, the ML for grilled paprika is **1.0 mg/kg**.

Further examples are provided in the European Commission's [Frequently Answered Questions document](#) (pp. 15–18).

Q29: When calculating the maximum level for compound foods, if no ML is set for an ingredient, should that ingredient be calculated at zero or the LOQ?

If no ML is set for an ingredient in a compound food, that ingredient should be calculated at zero, and not at the LOQ (see Q28). The ingredient should be calculated at zero even where there is an IL for that ingredient.

Q30: What is the maximum level for a compound food if none of the ingredients has an ML?

If no ML is set or any of the ingredients in a compound or processed food, no ML applies to the compound or processed food. However, if competent authorities consider that the compound or processed food is not safe due to the levels of MOAH above the LOQ, they may take measures (see Q16).

Q31: When specific maximum levels are established for certain compound foods, the situation could occur that when preparing foods on the basis of raw materials that are compliant (e.g. 60% cereal flour @ 0.5 mg/kg, 40% oil @ 2.0 mg/kg), the resulting compound food would be non-compliant (1.1 mg/kg measured concentration versus ML of 1.0 mg/kg). How will this be treated?

It is unlikely that a compound food containing only compliant ingredients would contain MOAH concentrations exceeding the ML. However, food business operators should ensure that they source ingredients with sufficiently low MOAH concentrations to ensure compliance of the final compound food with the ML.

E. Food additives

Q31: What is the basic approach to MOAH maximum levels for food additives?

If a food additive is produced from a raw food material for which an ML is set, that raw material must be compliant with the relevant ML. The ML for the food additive can be calculated taking into account a processing factor (Regulation [2023/915](#), Art. 3).

Q32: What are the maximum levels for food additives produced from materials other than food?

If a food additive is produced from materials other than food, the MLs for food additives set in the upcoming Regulation do not apply. However, discussions are ongoing in the EU about establishing MLs for certain food additives that are produced from non-food sources, for example, for certain waxes.

Q33: Are there maximum levels for food enzymes?

As enzymes do not fall under the definition of food additives, no requirements are set for MOAH in food enzymes under the upcoming Regulation. However, a processed or compound food containing enzymes must comply with MLs for processed or compound foods (see Q27).

Q34: Food additives produced from oils and fats must be compliant with maximum levels for oils and fats “placed on the market to the final consumer or used as an ingredient in food”. Lecithin and tocopherols are obtained from crude oil, rather than oils placed on the market to the final consumer. How should maximum levels be calculated for these food additives?

From 1 January 2027, where food additives are produced from refined edible oils, those oils must comply with the MLs for oils and fats placed on the market to the final consumer or used as an ingredient in food.

Until 31 December 2029, food additives can be produced from crude/ non-refined edible oils that do not comply with the MOAH MLs. In such cases, additive producers need to ensure that these oils are refined to ensure compliance with the MOAH MLs, before producing food additives from those oils. Furthermore, food and food additive producers should check the MOAH concentration in the final food additive to ensure compliance with the MLs for the oil/fat placed on the market to the final consumer or used as an ingredient in food, taking into account the appropriate processing factor (Regulation [2023/915](#), Art. 3).

From 1 January 2030 onwards, producers of food additives can only use edible oils destined for further refining that comply with the MOAH MLs that apply to those oils.

Q35: What is the maximum level for carmine from cochineal?

As cochineal are insects and no ML is set for insects, there is no ML for carmine.

Q36: What about food additives imported from non-EU countries? How will compliance be ensured if compliance of raw materials cannot be checked? Will data on the finished food additive, rather than the starting material, be sufficient to demonstrate compliance?

Businesses importing food additives that are produced from food ingredients must be able to demonstrate that the concentration of MOAH in the final food additive complies with the ML, taking into account the ML for the food used as source material and the appropriate processing factor (Regulation [2023/915](#), Art. 3).

Q37: Is there a MOAH maximum level set for food additives obtained from ingredients for which no ML is set?

There is no specific MOAH ML for food additives obtained from ingredients for which no ML is set.

Q38: Do maximum levels apply to food additives produced from non-food sources, e.g. waxes (E901–E903)?

No, but there are ongoing discussions about setting MLs for MOAH in the future for microcrystalline waxes and other waxes. A new Regulation on these MLs would be notified to the World Trade Organization (WTO) Sanitary and Phytosanitary SPS Committee for comment prior to adoption.

Q39: Does the EU intend to set MOAH maximum levels for specific food additives under the EU food additives legislation?

Yes, discussions are ongoing to set MLs for specific food additives under the EU food additives legislation, for example for lecithin and certain waxes. If MLs are not set for specific food additives, the MOAH MLs set in Regulation [2023/915](#) will apply.

F. Processed food and processing factors

Q40: When is a food considered to be “processed”?

Under EU law (Regulation [852/2004](#), Art. 2(m)), processing is defined as “any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes”. Frozen foods are not considered as processed foods.

Q41: Are the levels for MOAH in food established for dry matter?

The MLs for MOAH in food apply to the foods as such (as placed on the market). They do not apply on a dry matter basis.

Q42: Is there further EU guidance available on processing factors in relation to food contaminants?

The EU is developing guidance on processing factors in relation to food contaminants, and intends to publish this guidance before the end of 2026.

Q43: For dried herbs or spices, should a processing (drying) factor be applied?

The ML for spices applies to the dried product whole, crushed, or ground. For herbs, the ML is explicitly set for “dried herbs”. In both cases, no processing (drying) factor needs to be applied.

G. Oils

Q44: The category “animal and vegetable fats and oils” (5.5.2) lists specific oils (e.g. maize, rapeseed, etc.). What about oils not specifically mentioned (e.g. marula oil, Kalahari melon seed oil, and mongongo oil)?

An MOAH ML also applies to edible oils that are not specifically mentioned in the upcoming Regulation. These oils fall under category 5.5.2.7 “other fats/oils”.

Q45: For certain crude vegetable oils (e.g. palm oil), there is a problem of biogenic interference (natural organic matter being mistaken for mineral oil contamination). How should compliance with the maximum level of 2.0 mg/kg be demonstrated for these oils from 2030 onwards?

Laboratories that specialise in MOH analytics (listed in the EURL-PC list of laboratories, see Q61) can address this issue through special sample pre-treatments such as expoxidation (in accordance with ISO Standard DIN EN ISO 20122:2025-06). In some exceptional cases the GC×GC method must be applied (see section J) to distinguish the real MOAH from endogenous plant interferences.

Q46: Does the category “other fats/oils” (5.5.2.7) include essential oils?

No, there are no MLs set for “essential oils, lampante and crude olive pomace oil”, which are explicitly excluded from the category of animal and vegetable oils. Indicative levels for MOAH and MOSH are set for essential oils.

H. Sources of contamination

Q47: How are herbs, spices, or grains contaminated through the drying process?

If herbs, spices, or grains are dried using “direct drying-methods” (e.g. combustion exhaust gases), there is a risk of MOSH and MOAH contamination. Drying on asphalt can also be a source of contamination. Alternative drying methods (indirect drying or solar drying on a non-contaminated surface) must be used to avoid contamination.

Q48: Can adjuvants used in agriculture be a source of MOAH/MOSH contamination?

Some adjuvants that are used in plant protection products to enhance their efficiency are based on mineral-oil derived products (such as paraffins). These are possible sources of contamination.

I. Analysis

Q49: Which is the approved method of testing for MOAH?

The method for MOAH analysis is liquid chromatography–gas chromatography–flame ionization detection (LC-GC-FID). The European Commission’s Joint Research Centre (JRC) has published [*Guidance on sampling, analysis and data reporting for the monitoring of mineral oil hydrocarbons in food and food contact materials*](#). When needed, for example in cases of suspected interferences, characterisation of interferences should be done on the basis of a comprehensive gas chromatography (GC×GC).

Q50: Is there a simple test that can determine whether the result is positive or negative without the need for quantification?

There are (semi-quantitative) tests on the market that are based on thin-layer chromatography (TLC). However, those methods are not recommended by the EU because they are not sensitive enough, and therefore are not suitable for measuring MOAH and MOSH in foodstuffs.

Q51: What demonstration of compliance with maximum levels can companies provide when no approved method for MOSH/MOAH analysis currently exists (e.g. probiotic food supplements)

The method for analysing foodstuffs is the LC-GC-FID method referred to in the JRC [Guidance](#). In some exceptional cases, the GC×GC -method must also be applied to confirm analyses. The European Union Reference Laboratory for Processing Contaminants in Food (EURL-PC) has published [Analysis of MOSH and MOAH in food by GC×GC: Guidance on analysis, interpretation and data reporting](#).

Q52: Is the analytical methodology effective in a case such as crude fish oils, where there are interfering substances?

The appropriate method for analysing crude fish oils is also LC-GC-FID. The achievable LOQ for these oils is 5.0 mg/kg as indicated in the [Annex](#) to upcoming Regulation amending Regulation (EC) No 333/2007 on the methods of sampling and analysis for the control of levels of mineral oil hydrocarbons in foodstuffs. When needed, for example in cases of suspected interferences, characterisation of interferences should be done on the basis of a comprehensive gas chromatography (GC×GC).

Q53: If a product is sold to consumers in a metal tin packaging, should the whole product in the tin be sent for analysis, or should the food be decanted into another container?

The packed product must comply with the EU MLs. It is advised to send the product in its original packaging (food in the tin) to the laboratory. The packaged food (food in the tin) should be sent in a clean, inert container offering adequate protection from contamination, from loss of analytes by adsorption to the internal wall of the container, and against damage in transit. In the laboratory, the food should be analysed and, where MOAH concentrations are quantified, the packaging should also be analysed to determine whether it is the source of the contamination.

Q54: What is the best way to check the containers (plastic bags) that will hold samples before sending them for analysis?

Specialised laboratories offer specific migration tests that are suitable for testing packaging such as plastic bags. One strategy is to divide the (homogenised) foodstuff sample into multiple parts, and provide samples in plastic bags and another container known not to be a source of contamination (such as a glass jar covered with aluminium foil). Any difference in the result points to a contamination from the plastic bag. Polyolefin oligomeric saturated hydrocarbons (POSH) in plastic can migrate into foodstuffs and will be analysed as MOSH when using the approved EU-approved LC-GC-FID method (see Q49). MOSH can be distinguished from POSH with GC×GC.

Q55: Is a glass container sealed with an aluminium top a suitable container for samples? Where can we find further guidance on sampling?

Sample containers should be made of glass, aluminium, or other materials that do not release hydrocarbons. Polyethylene terephthalate may be suitable, but not polyethylene, polypropylene, or paper. Caps should be lined with aluminium foil or polytetrafluoroethylene (e.g. Teflon). Aluminium foil should be cleaned before use to remove residual oils and lubricants from production. Attention should be paid to closures and sealing materials of the container. An empty sample container could be sent together with the samples to check if encountered contamination is from the container.

Q56: Why is the laboratory analysis for products in oil performed only on oil, not on the whole product?

The whole product (product and oil) must comply with the MLs, so the laboratory should homogenise the entire product and assess its compliance with the ML.

Q57: What type of container is recommended for sampling cereals and pulses?

That depends. For fresh pulses, a glass container might be appropriate, whereas for dried cereals and pulses, (tested) plastic sacks could be used. The use of jute bags is not recommended for samples of cereals and pulses if this type of packaging is not intended to be used for final commercialisation or distribution.

Q58: A polytetrafluoroethylene (PTFE) layer is recommended by the European Commission, but does this not contain per- and polyfluoroalkyl substances (PFAS) that are prohibited in food packaging?

In this case, the container is for the purpose of transporting food for analysis. It is not packaging as defined by Regulation [2025/40](#) on packaging and packaging waste: that is, it is not a product destined for another economic operator or an end user (Art. 3.1(1)). The rules regarding PFAS therefore do not apply to sample containers.

Q59: Is there a risk of MOAH contamination from aluminium tops?

There is generally no, or a very low, MOAH contamination risk associated with aluminium tops. To eliminate any risk, these could be submitted for laboratory analysis. Aluminium tops attached to food packaging with hot-sealing glues can be a source of resin oligomeric saturated hydrocarbons (ROSH) and resin oligomeric aromatic hydrocarbons (ROAH) that are interferences in MOSH and MOAH analysis, respectively. So this needs to be considered when preparing samples for analysis.

Q60: What should a business do if the results of controls differ significantly from its own analysis of the products?

For all official controls (not just for MOAH), food business operators have the right to request a second expert opinion and, where appropriate, another analysis of a sample of the product at their own expense (Regulation [2017/625](#)).

J. Laboratories

Q61: Can the EU provide a list of non-EU laboratories that are equipped to test for MOAH and MOSH in line with the upcoming Regulation?

The European Union Reference Laboratory for Processing Contaminants (EURL-PC) has compiled a list of laboratories able to analyse total MOAH content at the required LOQs. This list is made available upon request via e-mail to eurl-pc@food.dtu.dk³ with “GET MOAH LAB LIST” in the subject field.

Q62: Do laboratories in other countries need to be accredited by the EU?

The laboratories must operate in accordance with standard ISO/IEC 17025, and the analytical method must be accredited in accordance with that standard by a national accreditation body.

Q63: How high is the measurement of analytical uncertainty?

An accredited laboratory that analyses samples must provide the level of analytical uncertainty (expanded measurement uncertainty) on the laboratory report that communicates the results of an analysis. That measurement is specific to the laboratory used, and the characteristics of the method. European Commission’s proposed amendment of Regulation [333/2007](#) includes performance criteria for the analytical methods, and further explanations on calculating the measurement uncertainty.

Q64: Is analytical uncertainty taken into account by EU control authorities?

Yes, the expanded measurement of uncertainty is taken into account by EU control authorities (see Regulation [333/2007](#), Annex: D.1.3, D.2).

Q65: As a business exporting or importing a product, should I also take into account the measurement uncertainty when analysing whether my product is compliant?

In accordance with Regulation 333/2007, the measurement uncertainty can be taken into account for controls performed by food business operators when assessing compliance. However, if doing so, food business operators should consider the risk that when the product is retested by a business partner or control authority, a higher level of contamination may be found that will make the product non-compliant (even when taking measurement uncertainty into account).

Q66: Is the measurement of uncertainty taken into account in the case of baby foods?

Yes, the expanded measurement uncertainty is also taken into account by EU control authorities in relation to baby foods.

K. Compliance strategies

Q67: Are there any EU guidelines on compliance strategies for preventing or mitigating the presence of MOAH?

There are no specific guidelines on strategies for preventing or mitigating MOAH. However, a good source of information is the [Toolbox on reducing the transfer of mineral oils into food](#) (2018) published by FoodDrinkEurope.

³ This list is made available with the understanding that neither the EURL-PC (European Union Reference Laboratory for Processing Contaminants) nor the European Commission in any way authorise, endorse or scrutinise the information given by the laboratories.

Q68: When shipping cereals and pulses, container linings can be a source of contamination. How can this be avoided?

To avoid this source of contamination, linings that are *not* produced from recycled cardboard or paper should be used. Virgin paper, virgin cardboard, or plastics that have been proven to be MOAH-free can be used.

Q69: For raw commodities shipped in bulk, is it advisable to test at origin?

To develop confidence between buyers and sellers, a good strategy is to agree to testing at origin and also at destination. This will help establish whether there is contamination in the raw commodity itself, and whether contamination is potentially occurring during transport.

Q70: Is there a way of reducing the presence of MOAH in vegetable oils?

A reduction of certain “light” MOAH fractions can be achieved by the refining of oils; however, the heavier and most toxic MOAH fractions remain in the food. There is a special process of refining, short path distillation (SPD), which reduces MOSH and MOAH far more efficiently. This process is cost-intensive and will lead to “refined oils” without the original properties (taste and odour) of the pressed oil.

Q71: Does the EU have international projects/funding to support compliance with MOSH/MOAH requirements?

There are opportunities for capacity building in relation to EU food safety standards. Requests for such support should be primarily addressed to (and discussed with) the EU Delegation in the country concerned. The importance of this issue should be underlined, taking into account other requests for support emanating from the same national authorities.

Q72: Other than analysing the final compound food, what steps can be taken to ensure the compliance of those foods if you are not the owner of the process?

If you are not the owner of the process, the processed or compound food can be analysed, or an analysis certificate can be requested from the supplier, in order to check compliance of the purchased compound or processed food. In cases of non-compliance, the batch should be refused. Further action may include (but is not limited to) a request for step analytics initiated by the process owner; further discussion and risk assessment with the process owner; and auditing the process owner. If the supplier is reluctant to take steps to avoid the contamination or continued non-compliance, sourcing from another supplier should be considered.

Q73: Do food colours extracted using solvents need to be tested for MOAH/MOSH, or is a declaration from a supplier of the extraction solvent sufficient?

Food colours fall under category 5.5.12 food additives, and MLs apply where food colours are produced from a raw material for which an ML is set. The decision as to whether to test the colour will depend on your own risk assessment and the extent to which you wish to rely on declarations from your supplier. If there is uncertainty, it is advised to investigate that risk by analysing the food colour.



L. Maximum and indicative levels on specific products

Q74: For a range of specific products, clarification was requested on the applicable MOAH MLs and ILs.

Table 2. MOAH maximum and indicative levels for a range of specific products

Note

* Where no specific ML applies, it is up to EU Member States to decide whether they will withdraw, and if necessary recall from the market, a product that exceeds the LOQ, based on an *ad hoc* risk assessment (see Q16).

Product	Food category	Dates applicable	MOAH	
			Maximum level	Indicative level (see Q13)
"Re-esterified" oils such as medium-chain triglyceride (MCT) oil or fatty acids	5.5.2 animal and vegetable fats and oils	1 January 2027 to 31 December 2029	Calculated based on ML for the edible oil from which it was produced and the appropriate processing factor (Reg. 2023/915, Art. 3).	
	5.5.13 Compound/processed food	From 1 January 2030	MLs at the LOQ according to the fat/oil content See Q27	
- Banana chips fried in coconut oil - Broths, vegetable stock, stock cubes - Blanched peanut - Chocolate - Food ingredients produced from vegetable oils with no fat content - Seafood products containing vegetable oils - Canned fish in oil - Compound foods containing ricinoleic acid from castor oil - Compound foods containing beeswax	5.5.13 Compound/processed food	1 January 2027 to 31 December 2029	ML calculated according to quantities of ingredients/processing factors and MLs of ingredients, <i>if there is at least one ingredient with an ML</i> See Q27	
		From 1 January 2030	MLs at the LOQ according to the fat/oil content See Q27	
Wheat gluten	5.5.5 Cereal grains and products derived from cereals.	From 1 January 2030	MLs at the LOQ according to the fat/oil content	
Ricinoleic acid from castor oil	As castor oil is not a common food or cooking oil, it is not in scope of Regulation		No ML*	



Product	Food category	Dates applicable	MOAH	
			Maximum level	Indicative level (see Q13)
- Animal fats other than butter - Shea butter	5.5.2.7 Other oils and fats	1 January 2027 to 31 December 2029	4.0 mg/kg if destined for final consumers or for use as an ingredient in food	
		From 1 January 2030	2.0 mg/kg if intended for further refining and labelled as such	
Beeswax	Not in scope of Regulation		No ML*	
Chickpea flour	5.5.4 Pulses	From 1 January 2030	0.50 mg/kg, taking into account the appropriate processing factor (Reg. 2023/915 , Art. 3).	
Dehydrated vegetables e.g. onion or garlic powder	Processed vegetable		No ML*	2.0 mg/kg
Fruit pulps, juices and nectars	Processed fruits		No ML*	2.0 mg/kg
Green coffee beans	Coffee beans		No ML*	1.0 mg/kg
Oils/resins extracted from spices	Essential oils		No ML*	10 mg/kg
- Paprika powder - Vanilla	5.5.9 Spices	From 1 January 2027	10.0 mg/kg	
		From 1 January 2030	5.0 mg/kg	
Peanut oil	5.5.2.2.1 Groundnut oil	From 1 January 2027	6.0 mg/kg if destined for final consumers or for use as an ingredient in food	
			2.0 mg/kg if intended for further refining and labelled as such	
Plant extracts for use in food supplements	5.5.9 Spices or dried herbs, teas, or herbal infusions	From 1 January 2027	10.0 mg/kg	
		From 1 January 2030	5.0 mg/kg	
	Extracts from other plants		No ML*	2.0 mg/kg
Final food supplements containing plant extracts (for both spices and extracts from other plants)	5.5.11 Food supplements	From 1 January 2027	10.0 mg/kg	
		From 1 January 2030	5.0 mg/kg	
Processed meat containing animal fat	Processed meat products		No ML*	2 mg/kg
Pseudocereals (chia and quinoa)	5.5.5 Cereal grains	From 1 January 2027		



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