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FEEDBACK ON THE PLANNED ESTABLISHMENT OF A MAXIMUM LIMIT OF 2.0 MG/KG MOAH IN
ALL FOOD ADDITIVES

Introducing a horizontal limit value would have disproportionate consequences

The planned establishment of a maximum limit of 2.0 mg/kg for aromatic mineral oil hydrocarbons (MOAH) in all food additives by the European Commission stands in contradiction to the industry's pursuit of an exposure-based approach. Such a step would have dramatic consequences for some supply chains in terms of shortage of raw materials and products – with resulting problems for all sectors.

The European Food Safety Authority (EFSA) has specifically identified waxes and white oil as potential "problematic substances," while the situation for most other additives remains largely unclear. Up until now, companies have determined the relevance of MOAH in the production of their additives based on risk assessments. In our view, it is not convincing to assert a fundamental problem in this area. Therefore, we take the stance that establishing a horizontal maximum level of MOAH for all food additives is inappropriate. If MOAH is considered a risk in certain food additives, this should be addressed by establishing concrete risk-based thresholds in the specifications of such food additives – based on individual EFSA assessments. We would compare the MOAH situation to the establishment of 3-MCPD and glycidyl ester levels for certain emulsifiers where the contaminant levels have been set for individual food additives.

Therefore, we speak to refrain from a horizontal limit and to regulate only those food additives where MOAH is demonstrably present. In addition, we would mention that analytical methods for many different additives are not yet sufficiently developed, and validations are lacking to ensure reliable detectability at the proposed limit. Similarly, the issue of solvents such as hexane and their role in the entry of MOAH during the production of additives or extracts is still entirely unclear. Further research is needed to deepen the knowledge and restrict potential sources of MOAH exposure.

The efforts for the continuous reduction of the presence of MOSH and MOAH in food are based on an understanding of the ALARA principles. The effectiveness of this is demonstrated through voluntary commitments, such as the joint German project "MOH Orientation Values." The said model undergoes continuous updates and has a crucial role in the targeted identification of entry sources and the adaptation of established practices.

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