



**KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ**

Sayı : 35649853-TİM.KİB.GSK.ARGE.2026/70-1071

Giresun, 02/04/2026

Konu : Mineral Yağ Aromatik Hidrokarbonlar (MOAH) Maksimum Limitleri – Veri
Toplama Süreci (Hububat, Bakliyat, Yağlı Tohumlar ve Mamulleri)

E-POSTA

**KARADENİZ HUBUBAT BAKLIYAT YAĞLI TOHUMLAR VE MAMULLERİ
İHRACATÇILARI BİRLİĞİ ÜYELERİNE SİRKÜLER**

2026 / 171

Sayın Üyeler,

Tarım ve Orman Bakanlığının bir yazısına atfen, Türkiye İhracatçılar Meclisinden (TİM) alınan 31/03/2026 tarih 179-935 sayılı yazıda;

11/03/2026 tarihinde Avrupa Birliği tarafından Sağlık ve Bitki Sağlığı (SPS) kapsamında Dünya Ticaret Örgütüne yapılan bildirimde, gıdalarda mineral yağ aromatik hidrokarbonlar (MOAH) için maksimum limitlerin belirleneceği bir örneği ilişik taslak tüzüğün hazırlandığının duyurulduğu belirtilmektedir.

Söz konusu yazıda ayrıca, MOAH için ülkesel pozisyonumuzun belirlenmesi amacıyla Tarım ve Orman Bakanlığımıza iletilmesini teminen gıda işletmelerinden ellerindeki MOAH analiz sonuçları talep edilmektedir.

Öte yandan, taslak tüzük metninden de anlaşılacağı üzere, Birliğimiz işgal alanına giren bazı ürünler için aşağıdaki maksimum limitlerin belirlendiği görülmektedir:

- yağlı tohumlar ve yağlı meyveler (mısır, kanola, ayçiçeği, soya ve keten tohumu) için 2,0 mg/kg,
- hayvansal ve bitkisel katı ve sıvı yağlar (mısır, kanola, ayçiçeği, soya ve keten tohumundan elde edilen yağlar) için 2,0 mg/kg,
- bakliyat ürünleri için 0,50 mg/kg,
- tahıllar ve tahıl ürünleri için 0,50 - 1,0 mg/kg
- şekerleme, kakao ve çikolata ürünleri için 0,50 – 1,0 – 2,0 mg/kg

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**KARADENİZ İHRACATÇI BİRLİKLERİ
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Bu bağlamda, TİM'e verilecek cevaba esas teşkil etmek üzere, gıda ürünlerine ilişkin olarak üyelerimizin elinde bulunan MOAH analiz raporlarının **22 Nisan 2026 Çarşamba günü mesai bitimine kadar** Genel Sekreterliğimizin arge@kib.org.tr adresine gönderilmesi hususunu önemle bilgilerinize sunarız.

e-imzalıdır
Sertaç Ş. TORAMANOĞLU
Genel Sekreter

Ek: AB Taslak Tüzüğü (12 sayfa)



Brussels, **XXX**
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COMMISSION REGULATION (EU) .../...

of **XXX**

amending Regulation (EU) 2013/915 as regards maximum levels of mineral oil aromatic hydrocarbons in food.

(Text with EEA relevance)

COMMISSION REGULATION (EU) .../...

of **XXX**

amending Regulation (EU) 2023/915 as regards maximum levels of mineral oil aromatic hydrocarbons in food

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EEC) No 315/93 of 8 February 1993 laying down Community procedures for contaminants in food¹, and in particular Article 2(3) thereof,

Whereas:

- (1) Commission Regulation (EU) 2023/915² sets maximum levels for certain contaminants in foodstuffs.
- (2) Mineral oil hydrocarbons ('MOH') are chemical compounds containing 10 to about 50 carbon atoms, which are derived mainly from crude oil, but also produced synthetically from coal, natural gas and biomass. MOH can contaminate food in many ways, such as lubricants for machinery used during harvesting and food production, processing aids like release agents or dust binders, food or feed additives, food contact materials or environmental contamination. MOH are divided into two main types: mineral oil saturated hydrocarbons ('MOSH') and mineral oil aromatic hydrocarbons ('MOAH').
- (3) In 2012, the European Food Safety Authority ('the Authority') adopted a Scientific Opinion on mineral oil hydrocarbons in food³. The Authority concluded that the potential human health impact of groups of substances among the MOH vary widely. MOAH may act as genotoxic carcinogens, while some MOSH can accumulate in human tissue and may cause adverse effects in the liver. Therefore, the exposure to MOSH and MOAH from food is of potential concern.
- (4) In order to better understand the relative presence of MOSH and MOAH in food commodities that are major contributors to dietary exposure, by means of Commission Recommendation (EU) 2017/84⁴, Member States, with the active involvement of food business operators as well as manufacturers, processors and distributors of food contact materials and other interested parties, were recommended to perform

¹ OJ L 37, 13.2.1993, p. 1, ELI: <http://data.europa.eu/eli/reg/1993/315/oj>.

² Commission Regulation (EU) 2023/915 of 25 April 2023 on maximum levels for certain contaminants in food and repealing Regulation (EC) No 1881/2006 (OJ L 119, 5.5.2023, p. 103, ELI: <http://data.europa.eu/eli/reg/2023/915/oj>).

³ EFSA Panel on Contaminants in the Food Chain (CONTAM); Scientific Opinion on mineral oil hydrocarbons in food. EFSA Journal 2012;10(6):2704, <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2012.2704>.

⁴ Commission Recommendation (EU) 2017/84 of 16 January 2017 on the monitoring of mineral oil hydrocarbons in food and in materials and articles intended to come into contact with food (OJ L 312, 17.1.2017, p. 95, ELI: <http://data.europa.eu/eli/reco/2017/84/oj>).

monitoring of the presence of MOH in food and food contact materials. Furthermore, it was recommended that where MOH are detected in food, investigations should be carried out in order to determine the sources of the contamination and measures should be implemented to prevent the occurrence of MOH in food.

- (5) Taking into account the new occurrence data collected following Recommendation (EU) 2017/84 and new scientific information, the Authority adopted an updated risk assessment of mineral oil hydrocarbons in food on 12 July 2023.⁵
- (6) The Authority concluded that MOSH may accumulate in various organs, but that the present dietary exposure to MOSH does not raise a concern for human health for all age classes. As regards MOAH, it concluded that MOAH with 3- or more aromatic rings may be associated with genotoxicity and carcinogenicity. Due to a lack of toxicological information on the effects of MOAH with 1 and 2 aromatic rings, and to the presence of MOAH with 3- or more aromatic rings in the diet, the exposure to total MOAH is a possible risk for human health.
- (7) Maximum levels for MOAH in food should therefore be set to ensure a high level of human health protection. Those maximum levels should apply regardless of the source of the contamination, which means that they should apply to contaminations that were originally present in raw materials or ingredients or that occurred during the production process, transport and packaging. This includes also contaminations of foods due to the use of authorised but contaminated food additives and food contact materials.
- (8) From the occurrence data and investigations towards the sources of the contamination of food with MOAH, it has become clear that in most foods the occurrence of quantifiable concentrations of MOAH can be prevented. Therefore, in accordance with the ‘As Low As Reasonably Achievable’ principle, maximum levels should, where possible, be set at the limit of quantification. However, for foods for which it has been demonstrated that concentrations below the limit of quantification cannot be achieved, even when applying good practices, maximum levels above the limit of quantification should be established. For those foods, in order to ensure that food business operators make continued efforts to identify and implement mitigation measures to reduce the contamination, clear timelines should be set for further lowering the maximum levels.
- (9) As studies have demonstrated that the transfer of MOAH from dry tea and dry herbal infusions other than instant tea or instant herbal infusions to the brewed beverage is limited, no maximum level should apply to such dry tea and herbal infusions, unless they are used as an ingredient in food.
- (10) In accordance with Article 3(1) of Regulation (EU) 2023/915, the maximum levels established in the Annex I to that Regulation also apply to dried, diluted, processed and compound foods, taking into account the appropriate processing factor. When applying Article 3(1) of Regulation (EU) 2023/915 for calculating the applicable maximum levels for MOAH, maximum levels might be obtained that are below the limit of quantification. In those cases, the applicable maximum level should be increased to the achievable limit of quantification. For dry tea and dry herbal infusions other than instant tea or instant herbal infusions, in which spices or dried herbs are used, the maximum level that is calculated in accordance with Article 3 of Regulation

⁵ EFSA Panel on Contaminants in the Food Chain (CONTAM); Scientific Opinion on an update of the risk assessment of mineral oil hydrocarbons in food. EFSA Journal 2023;21(9):8215, <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2023.8215>.

(EU) 2023/915 should not apply unless the tea or herbal infusions are used as an ingredient in food.

- (11) Since this Regulation lays down specific maximum levels applicable as of 1 January 2030 for processed and compound foods, in which ingredients were used for which a maximum level is set, this increase of the applicable maximum level to the limit of quantification should only apply until 31 December 2029.
- (12) Regulation (EU) 2023/915 should therefore be amended accordingly.
- (13) A reasonable period should be provided to allow food business operators to adapt to the maximum levels set out in this Regulation.
- (14) Taking into account that certain foodstuffs covered by this Regulation have a long shelf life or may be processed into products with such a long shelf life, foodstuffs that were lawfully placed on the market before the date of application of the maximum level should be allowed to remain on the market until their date of minimum durability of use-by date.
- (15) A reasonable period should be provided to allow for the food business operators to adapt to the maximum levels set out in this Regulation.
- (16) The measures provided for in this Regulation are in accordance with the opinion of the Standing Committee on Plants, Animals, Food and Feed,

HAS ADOPTED THIS REGULATION:

Article 1

Regulation (EU) 2023/915 is amended as follows:

- (1) in Article 3, the following paragraphs are added:
 - ‘4. Until 31 December 2029, for mineral oil aromatic hydrocarbons (‘MOAH’), when calculating the applicable maximum level in accordance with this Article, the following rules apply:
 - a) in case the maximum level calculated in accordance with this Article is below the limit of quantification of 0,50 mg/kg for foods with a declared fat/oil content or, in absence of a declared fat/oil content, of fat/oil content as determined by the competent authority of less than 4%, the maximum level shall be increased to 0,50 mg/kg;
 - b) in case the maximum level calculated in accordance with this Article is below the limit of quantification of 1,0 mg/kg for foods with a declared fat/oil content or, in absence of a declared fat/oil content, of fat/oil content as determined by the competent authority of between 4% and 50%, the maximum level shall be increased to 1,0 mg/kg;
 - c) in case the maximum level calculated in accordance with this Article is below the limit of quantification of 2,0 mg/kg with a declared fat/oil content or, in absence of a declared fat/oil content, of fat/oil content as determined by the competent authority of more than 50%, the maximum level shall be increased to 2,0 mg/kg;
 5. For MOAH in tea and herbal infusions other than instant tea or instant herbal infusions, no maximum level shall be calculated in accordance with this article, unless the tea or herbal infusion is used as an ingredient in food.’;
- (2) Article 10(1) is amended as follows:

(a) the introductory phrase is replaced by the following:

‘Food lawfully placed on the market prior to the dates referred to in points (a) to (u) may remain on the market until their date of minimum durability or use-by date:’;

(b) the following point is added:

(u) 1 January 2027 as regards the maximum levels for mineral oil aromatic hydrocarbons set out in section 5.5 of Annex I, or in case a specific application date is listed in section 5.5 until that date;’.

(3) Annex I is amended in accordance with the Annex to this Regulation.

Article 2

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

It shall apply from 1 January 2027.

Done at Brussels,

For the Commission
The President
Ursula VON DER LEYEN



EUROPEAN
COMMISSION

Brussels, **XXX**
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ANNEX

ANNEX

to the

COMMISSION REGULATION (EU) .../...

amending Regulation (EU) 2023/915 as regards maximum levels of mineral oil aromatic hydrocarbons in certain foodstuffs.

ANNEX

Annex I is amended as follows:

- (1) in Section 5: Processing contaminants of the Annex to Regulation (EC) No 2023/915, subsection 5.5 Mineral Oil Aromatic Hydrocarbons is added:

5.5	Mineral Oil Aromatic Hydrocarbons (≥C10 to ≤C50)	Maximum levels (mg/kg)	Remarks
5.5.1	Oilseeds and oil fruits	2,0	
5.5.2	Animal ⁽²⁾ and vegetable fats and oils		
5.5.2.1	Maize, rapeseed, sunflower, soybean and linseed oil and dairy butter and fat.	2,0	
5.5.2.2	Groundnut, sesame, coconut and cereal germ oil.	6,0 from 01/01/2027 4,0 from 01/01/2028 2,0 from 01/01/2030	
5.5.2.3	Grape seed, cotton seed, blackcurrant seed and argan oil	10,0 from 01/01/2027 5,0 from 01/01/2028 2,0 from 01/01/2030	


5.5.2.4	Olive pomace oil and refined olive pomace oil ⁽⁷⁾	10,0 from 01/01/2028 5,0 from 01/01/2029 2,0 from 01/01/2030	
5.5.2.5	Fish oils and oils from other marine organisms and algae	10,0 from 01/01/2027 5,0 from 01/01/2030	
5.5.2.6	Oils and fats other than those listed in 5.5.2.1, 5.5.2.2, 5.5.2.3, 5.5.2.4 and 5.5.2.5.	4,0 from 01/01/2027 2,0 from 01/01/2028	This category includes cocoa butter. ⁽¹⁴⁾ Essential oils and crude olive pomace oil are not included in this category.
5.5.2.7	Products derived from fats and oils listed under 5.5.2.1 and 5.5.2.6 and products containing > 50% fat/ oil content, which only contain fats and oils listed under 5.5.2.1 and 5.5.2.6.	2,0 from 01/01/2028	Products derived from fats and oils are defined as products containing > 80% of fats and oils. The fat/oil content refers to the declared fat/oil content or, in absence of a declared fat/oil content, to the fat/oil content as determined by the competent authority.
5.5.3	Tree nuts	2,0	
5.5.4	Pulses	0,50	

5.5.5	Cereal grains and products derived from cereals.		<p>Products derived from cereals are defined as products containing > 80% of cereal products, excluding oils derived from cereals to which the maximum levels of category 5.5.2 apply.</p> <p>The maximum level does not apply to cereals used for the production of beer or distillates, provided that the remaining cereal residue is not placed on the market as food. In case the remaining cereal residue is placed on the market as food, the maximum level applies, taking into account Article 3(1), (2) and (4).</p> <p>The fat/oil content refers to the declared fat/oil content or, in absence of a declared fat/oil content, to the fat/oil content as determined by the competent authority.</p>
5.5.5.1	Cereal grains	0.50	
5.5.5.2	Products derived from cereals with < 4% fat/oil content	0,50	
5.5.5.3	Products derived from cereals with $\geq 4\%$ and $\leq 50\%$ fat/oil content	1,0	
5.5.6	Milk ⁽²⁾	0,50	
5.5.7	Dairy products ⁽²⁾ other than those listed under 5.5.2.1.		The fat/oil content refers to the declared fat/oil content or, in absence of a declared fat/oil content, to the fat/oil content as determined by the competent authority.
5.5.7.1	Products with < 4% fat/oil content	0,50	
5.5.7.2	Products with $\geq 4\%$ and $\leq 50\%$ fat/oil content	1,0	

5.5.7.3	Products with > 50% fat/oil content	2,0	
5.5.8	Cocoa beans and cocoa products ⁽¹⁴⁾		
5.5.8.1	Cocoa beans	2,0 from 01/01/2030	
5.5.8.2	Cocoa mass	2,0	
5.5.8.3	Cocoa powder and fat reduced cocoa powder	1,0	
5.5.9	Confectionery ^(*), cocoa and chocolate products ⁽¹⁴⁾ other than those listed in 5.5.2.6, 5.5.8.2 and 5.5.8.3		The fat/oil content refers to the declared fat/oil content or, in absence of a declared fat/oil content, to the fat/oil content as determined by the competent authority.
5.5.9.1	Products with < 4% fat/oil content	0,50	
5.5.9.2	Products with \geq 4% and \leq 50% fat/oil content	1,0	
5.5.9.3	Products with > 50% fat/oil content	2,0	
5.5.10	Spices, dried herbs, dry tea and dry herbal infusions that are used as an ingredient in food, dry instant tea and dry instant herbal infusions	10,0 from 01/01/2027 5,0 from 01/01/2030	

5.5.11	Infant formulae⁽³⁾, follow-on formulae⁽³⁾, young-child formulae⁽⁴⁾, food for special medical purposes intended for infants and young children⁽³⁾, baby food⁽³⁾, processed cereal-based food for infants and young children⁽³⁾ and drinks for infants and young children placed on the market and labelled as such.		The fat/oil content refers to the declared fat/oil content or, in absence of a declared fat/oil content, to the fat/oil content as determined by the competent authority.
5.5.11.1	Products with < 4% fat/oil content	0,50	
5.5.11.2	Products with ≥ 4% and ≤ 50% fat/oil content	1,0	
5.5.11.3	Products with > 50% fat/oil content	2,0	
5.5.12	Food supplements	10,0 from 01/01/2027 5,0 from 01/01/2030	
5.5.13	Food additives	-	For food additives that are produced from foods for which a maximum level is established under this Regulation, the foods that are used as a source shall comply with the maximum levels set out in this Regulation.
5.5.14	Processed and compound foods containing ingredients listed in categories 5.5.1, 5.5.2, 5.5.3, 5.5.4, 5.5.5, 5.5.6, 5.5.7, 5.5.8, 5.5.9 and 5.5.10.		The fat/oil content refers to the declared fat/oil content or, in absence of a declared fat/oil content, to the fat/oil content as determined by the competent authority. For tea and herbal infusions these maximum levels only apply to instant tea, instant herbal infusions and tea and herbal infusions that are used as an ingredient in food and not to other tea and herbal infusions.

5.5.14.1	Products with < 4% fat/oil content	0,50 from 01/01/2030	
5.5.14.2	Products with \geq 4% and \leq 50% fat/oil content	1,0 from 01/01/2030	
5.5.14.3	Products with > 50% fat/oil content	2,0 from 01/01/2030	

 As referred to in food category 05 in Part D of Annex II to Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives (OJ L 354, 31.12.2008, p. 16, ELI: <http://data.europa.eu/eli/reg/2008/1333/oj>).

(2) in footnote 1, the text is replaced by the following:

‘Fruits, tree nuts, vegetables, cereals, pulses, oilseeds, oil fruits, teas, herbal infusions, cocoa beans and spices as listed in the relevant category as defined in Annex I to Regulation (EC) No 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending Council Directive 91/414/EEC (OJ L 70, 16.3.2005, p. 1, ELI: <http://data.europa.eu/eli/reg/2005/396/oj>). For the purposes of this Regulation tree nuts are not covered by the maximum level for fruits.’