

# GOED Upcoming & Future Contaminants Scorecard

Last updated: 27 January 2025

Contaminant	Solubility in refined omega-3 oils	Occurrence data available?	Quantifiable levels in refined omega-3 oils found	Risk to health from food (fish/ fish oil) consumption	Regulations	Perceived concern for omega-3 sector	Manageable	Action items
PFAS	None	Yes	No	High	No	Very low	Yes	Manage media (GOED) / Check complex formulations (individual members)
Phthalates	High	Yes	Overall no, incidental findings of low levels for individual species	Intermediate <i>Reproductive health, endocrine disruptors</i>	No (EFSA: group TDI for four phthalates DEHP, DBP, BBP and DINP, and separate TDI for DIDP)	Low	Yes	Continued monitoring
MOAH	High	Yes	Yes	High <i>Mutagenic, carcinogenic</i>	Currently: EU member states harmonized action limit max 2 mg/kg. Proposed ML max 10 mg/kg to be published H1 2025, likely enforced Jan 2027 / max 5 mg/kg Jan 2030. Not clear if ML will apply to crude oils yet. Measurement uncertainties inclusion to be enforced by food authority (end 2024). (FBO autocontrols not yet clear) / Plausibly no MLs may be set for additives	Manageable until 2030. Improved mitigation needed by 2030	Work towards 2030 (improve mitigation and removal, analytical clarity)	- Laboratory proficiency program for omega-3 oils - Natural interference identification - Continued mitigation by individual members
MOSH	High	Yes	Yes	Low (lipogranulomas, further assessment needed)	EU – Proposed indicative limit, max 15 mg/kg	High-Intermediate	Improve mitigation and removal, analytical clarity	Keep monitoring developing situation, verify that no max limit will be enforced yet
<b>Brominated flame retardants:</b>								
HBCDDs	High	2024 RTP (available soon)	tbd	No	EFSA opinion (March 2021)	Low	tbd	Obtain data collection

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<b>PBDEs</b>	High	2024 RTP (available soon)	tbd	High	EFSA opinion (Jan 2024)	High	tbd	Obtain occurrence data
<b>TBBPA and derivatives</b>	High	2024 RTP (available soon)	tbd	No	EFSA opinion (July 2024)	Low	tbd	Obtain occurrence data
<b>Brominated phenols (and derivatives)</b>	High	No		No <i>Risk to breast-fed / formula-fed infants unclear</i>	EFSA opinion (Oct 2024)	Low	tbd	Obtain occurrence data
<b>Bisphenol A</b>	High	Yes	Yes	High	No ML for omega-3 oils. Regulation for food packaging (Jan 2025; BPA must be absent)	Intermediate	Unknown	Obtain more occurrence data, especially in ingredient oils. Determine risk of contamination from finished product packaging (plastic bottles)
<b>Organoarsenic species</b>								
<b>Monomethyl arsonic acid &amp; dimethyl arsinic acid)</b>	High	Not yet	tbd	High	EFSA opinion (July 2024)	Unknown	Unknown	Obtain occurrence data
<b>Complex organoarsenic species: Arsenobetaine, arsenosugars)</b>	Very low	No	tbd	No	EFSA opinion (Dec 2024)	Unknown	tbd	Keep monitoring situation. Identify laboratories that can measure these substances in O3 oils
<b>Complex organoarsenic compounds: Arsenolipids</b>	High	No	Yes (from literature)	Not yet known	EFSA opinion (Dec 2024)	High-intermediate	tbd	Keep monitoring situation. Identify laboratories that can measure these substances in O3 oils
<b>Chlorinated paraffins</b>	High	No	tbd	tbd	No	Unknown but possibly serious, given solubility and widespread contamination	tbd	Keep monitoring situation

tbd – to be determined