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EU update: what's changing and what matters now

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Simplifying food regulations



Omnibus X - food and feed safety simplification package

- Unveiled in December 2025, the Food and Feed Safety Package, also known as “Omnibus X”, aims to reduce administrative and compliance costs on food & feed businesses
- The Commission claims that the measures could save more than €1 billion in compliance cost for businesses and national authorities, primarily by reducing administrative and reporting obligations
- The package comprises three legislative proposals aimed at simplifying EU food and feed legislation across pesticides, biocides, GM food and feed, feed additives, food hygiene, food contact materials, official controls, animal welfare and animal health
- Omnibus X is currently under negotiation between the Council and the European Parliament. While no official adoption date has been announced, agreement on at least parts of the package could be expected during 2027, subject to the progress of trilogue negotiations

Omnibus programme

- Launched in 2025, the EU Omnibus initiative is a cross-sector programme to simplify EU legislation, reduce regulatory burden and support competitiveness while maintaining core policy objectives and standards
- In addition to the Food and Feed Safety Simplification Package there is also a Sustainability Omnibus that will simplify the recent sustainability reporting rules

Examples of Omnibus X simplifications

Novel foods & precision fermentation

- Advances in detection methods have created legal uncertainty over whether GMM-derived products require GMO authorisation
- The package creates clearer definitions with a four-condition test

BSE & TSE controls

- BSE/TSE controls are to be modernised
- Restrictions on collagen and gelatine from ruminant bones will be removed

Food contact materials

- Two 1980s Directives on migration testing for food contact plastics are repealed, their content being fully covered by Regulation (EU) No 10/2011
- The coexistence of the old Directives and the newer Regulation has created ambiguity. Repeal closes that gap

Border controls

- Partial release of food consignments at the border. Compliant portions could be released while inspections continue
- Improved efficiency for fresh food imports

Novel foods



New genomic techniques

- June 2026 - The EU adopted its long-awaited NGT Regulation (EU) 2026/1388, establishing a new regulatory framework for plants obtained through certain new genomic techniques (NGTs)
- Introduces a two-tier approval system for gene-edited plants:
 - NGT1 plants: subject to a simplified verification process and exempt from GMO labelling requirements
 - NGT2 plants: remain subject to the existing GMO authorisation, risk assessment and labelling requirements
- From 2027 - Most operational provisions become applicable, enabling the first NGT1 applications to be submitted and assessed under the new regime



Food only needs novel food authorisation if it has significantly changed composition etc.

Food follows GMO authorisation route & does not need novel food authorisation

Regulatory clarity for probiotic strains

- In December 2025, the European Commission has updated the Novel Food Catalogue, clarifying the regulatory status of 50 probiotic strains
- All strains included in the update are now recognised as non-novel for use in foods (including food supplements) or in food supplements only, confirming that novel food authorisation is not required for these microorganisms
- Established non-novel strains include:
 - *Lactobacillus fermentum*
 - *Lactobacillus johnsonii*
 - *Lactobacillus reuteri*
- Strains receiving formal non-novel recognition for the first time include:
 - *Kluyveromyces marxianus*
 - *Enterococcus faecalis*
 - *Rhizopus oryzae*
 - *Hafnia alvei*
 - *Corynebacterium flavescens*
- The update also explicitly confirms that *Bacillus clausii* and *Streptococcus oralis* are non-novel for use in food supplements

Contaminants & safety



Shift of emphasis on 3-MCPD & glycidyl fatty acid esters

- 3-MCPD is a process contaminant formed during vegetable oil refining. Long-term exposure may affect kidney function and is a potential carcinogenic concern
- Glycidyl fatty acid esters (GEs) are formed during high-temperature oil refining and can release glycidol, a genotoxic and carcinogenic substance
- Regulatory limits for 3-MCPD and GEs already exist for key ingredients such as vegetable oils, fats and hydrolysed vegetable proteins (HVPs)
- [Regulation 2026/1825](#) introduces tighter limits and extends controls to certain compound foods, reflecting concerns over consumer exposure from finished products
- For the first time, maximum levels have been established for certain composite/compound foods, such as bakery items, confectionery, snacks and infant foods, meaning compliance can no longer be demonstrated solely through the specification of the oil ingredient
- For compound foods, the new maximum levels apply from **1 January 2027**

Arsenic limits in fish

- EU 2025/1891: new arsenic limits for seafood
- Amends Regulation (EU) 2023/915 by introducing new maximum levels for inorganic arsenic in fish and seafood
- First time specific inorganic arsenic limits have been set for:
 - Fish
 - Crustaceans
 - Bivalve molluscs
 - Cephalopods
- Most fish species limited to 0.10 mg/kg, with higher limits for certain species naturally containing more arsenic
- Introduced following updated EFSA assessments showing seafood can be a significant source of dietary inorganic arsenic exposure
- Products lawfully placed on the market before 8 October 2025 may continue to be sold until their durability/use-by date



Proposed EU harmonised maximum vitamin and mineral levels

- European Commission is developing EU-wide maximum levels for vitamins and minerals in both food supplements and fortified foods, replacing the current fragmented national approach
- Proposed limits are based on a "residual amount" calculation - the difference between the scientific upper safe level and high dietary intake (95th percentile exposure). The residual amount would be shared between supplements and fortified foods, potentially reducing the maximum vitamin levels permitted in supplements
- Most affected vitamins/minerals are expected to be:
 - Vitamin B6
 - Vitamin C
 - Beta-carotene / Vitamin A
 - Zinc
 - Iron
 - Magnesium
 - Selenium
- Public consultation is expected in Q3 2026, with adoption of the final legislation currently planned for Q1 2028

Ceruelide: emerging EU food safety concern

- Cereulide contamination in infant formula triggered widespread recalls from late 2025/early 2026; investigations traced the contamination to arachidonic acid (ARA) oil used as an ingredient
- Cerulide is a heat-stable toxin produced by *Bacillus cereus*, with infants particularly vulnerable to acute effects such as vomiting
- EFSA established an acute reference dose of 0.014 µg/kg body weight in February 2026, providing a harmonised scientific basis for EU risk management
- EU emergency measures tightened controls on ARA oil from China, including increased official controls under Implementing Regulation (EU) 2026/459
- Further regulation is now proposed: the Commission's September 2026 draft would establish a 1 µg/kg maximum limit for cereulide in powdered infant/follow-on formula and relevant foods for special medical purposes, strengthening testing and compliance requirements

Additives



Limited additive law changes in last 12 months

- No new food additive substances were authorised in the last 12 months
- Regulatory activity focused on amendments to existing authorisations, including:
 - Quillaia extract (E999): authorised for use in food supplements and specifications updated (Regulation 2025/2084)
 - Shellac (E904): authorised for use in FSMP tablets and coated tablets (Regulation 2026/189)
 - Hydrocolloid restrictions in infant and young child foods (Regulation 2026/196)



Labelling & composition



New rules to facilitate innovation and growth in the low and no-alcohol wine market

- [Regulation - EU - 2026/471](#) is a significant reform package for the EU wine sector. The main labelling changes apply from **19 September 2027**
- Introduces harmonised terms such as “alcohol-free”, “0.0%”, and “reduced alcohol”
- Requires de-alcoholised products to indicate they were “produced by de-alcoholisation”
- Exempts wine intended solely for export from EU ingredient list and nutrition declaration requirements

Term	Alcoholic Strength (ABV)
0.0%	≤ 0.05% vol
Alcohol-free	≤ 0.5% vol
Reduced alcohol	> 0.5% vol and at least 30% below the minimum alcohol content required for the original wine category

Restrictions on 'meaty names' on plant-based

- On 29 July, [Regulation - EU - 2026/1739](#) was published and this brought into effect a ban on animal & meat-cut names for plant-based products
- It entered into force on 18 August, with a 3-year transitional period
- The purpose was to address supposedly misleading terms such as “plant-based chicken”, “vegan beef steak” & “soy bacon strips”
- The issue is hugely divisive with consumer & vegetarian groups highly opposed
- Cell cultured foods are (pre-emptively) captured within the ban, so ‘cell-cultured beef steak’ would not be allowed

Banned (31 terms in total)

- Beef
- Chicken
- Drumstick
- Steak
- Brisket
- Bacon

Not banned

- Burger
- Sausage
- Nuggets
- Ham

Questions?

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