

EU Food Limits: Inorganic Arsenic in Seafood and Nickel Deadlines

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Abstract

Commission Regulation (EU) 2025/1891 amended the EU contaminant framework with inorganic-arsenic maximum levels for named fish, crustacean, bivalve-mollusc and cephalopod groups, with exact edible-part rules and a separate total-arsenic entry for salt. Commission Regulation (EU) 2024/1987 created a broad nickel schedule across plant foods, cocoa, infant and young-child foods, juice and seaweed. Most nickel rows applied from 1 July 2025, while specified cereal rows applied from 1 July 2026. The implementation lesson is that analyte species, anatomical portion, food category, basis and application date must remain attached to every value. A total-arsenic result cannot establish compliance with an inorganic-arsenic maximum, and a nickel limit cannot be assessed without first resolving the product into the correct schedule row.

Arsenic Is a Speciation Rule Before It Is a Number

Regulation (EU) 2025/1891 is unusually important because it does not regulate arsenic as one undifferentiated analyte. The aquatic-food rows concern inorganic arsenic, defined through the relevant inorganic species, while the same instrument retains a separate total-arsenic treatment for salt [1]. A laboratory result labeled only arsenic or total arsenic cannot be compared directly with an inorganic-arsenic maximum. It can serve as screening evidence, but a compliance decision requires a species-preserving method and a reported iAs result. The distinction is not semantic. Seafood can contain substantial organic arsenic species that do not belong in the regulated inorganic fraction. Converting a total result into iAs by assumption would manufacture a legal value that the laboratory did not measure.

Seafood Scope Includes the Portion That Was Tested

The regulation separates general and listed fish groups, several crustacean categories, scallops and other bivalves, and cephalopods. It also identifies the anatomical portion to which a maximum applies. Crab-like groups use specified muscle meat; bivalve and scallop treatment differs; cephalopods are assessed without viscera. The HMI regulation record preserves those rows and basis notes rather than presenting one seafood limit [2]. This changes sampling plans. A certificate of analysis is not adequate merely because it says fish or shrimp. The evidence package must tie the sampled material to the legal commodity and edible portion. Composite sampling that includes an excluded organ can create a result that is analytically real but legally mismatched.

Nickel Uses a Two-Stage Calendar

Regulation (EU) 2024/1987 added nickel maximum levels across a far wider set of foods: nuts, vegetables, pulses, oilseeds, cereals, cocoa and chocolate, formula, baby food, juice and seaweed [3]. Most listed foods began to apply on 1 July 2025. The cereal subgroup identified in the regulation used 1 July 2026. By August 2026 that later date has passed, so a tracker still labeling the cereal rows adopted-not-effective would be stale. This is exactly why status must be computed against effective and transition

dates, not copied from last year's memo. The nickel schedule also contains close but non-interchangeable product rows, including distinctions among formula forms, soy-isolate formula, processed cereal-based infant food and other baby food. Product classification precedes numerical comparison.

The Testing Panel and Release Record Must Change Together

A brand selling affected EU products needs more than an updated spreadsheet. For seafood it needs an iAs-capable analytical pathway, sample descriptions that preserve species and edible-part identity, and a release rule that refuses total-arsenic substitution. For affected foods across the nickel schedule it needs nickel in the panel at a method capability suitable for the product row, plus a controlled category mapping. The release record should cite the applicable instrument, row, date and basis. It should also record when no direct row fit exists instead of silently choosing the nearest product. HMTc can connect these requirements to published standards, but the regulation compiler, not this article, is the source for exact binding values.

What Changes for Certification

The EU limit rows already preserved in HMI can enter the ordinary comparison against compiled standards. That can identify whether an existing standard is already at or below the relevant legal ceiling and whether a governance review is needed. The event does not authorize an editorial threshold rewrite. Operationally, seafood evidence should now make speciation and edible-part scope explicit, while nickel evidence should make product-row classification and the correct application date explicit. Nothing here converts total arsenic to inorganic arsenic, changes a non-EU market into EU law, or assumes that one nickel value covers every food.

Frequently asked questions

Can total arsenic testing show compliance with the EU seafood inorganic-arsenic limits?

Not by itself. Total arsenic can be a screen, but the regulated aquatic-food rows concern inorganic arsenic. A compliance result needs valid speciation and the correct edible portion.

When did the EU nickel limits start to apply?

Most listed food rows applied from 1 July 2025. Specified cereal rows applied from 1 July 2026, so their later transition has now ended.

Do all seafood products share one EU inorganic-arsenic limit?

No. The regulation separates fish groups, crustacean groups, scallops and other bivalves, and cephalopods, with exact portion rules. Product and anatomical scope must be resolved before comparison.

Do these EU rules automatically change every HMTc standard?

No. Verified structured limits enter the normal compiled-regulation comparison. Any published-standard revision still requires the existing evidence and governance process.

References

[1] Commission Regulation (EU) 2025/1891. Official Journal instrument adding inorganic-arsenic maximum levels for aquatic foods. · eur-lex.europa.eu

[2] Heavy Metal Index — EU 2025/1891 inorganic arsenic in fish and seafood. Neutral row-level evidence with species, commodity and basis notes. · heavymetalindex.com

[3] Commission Regulation (EU) 2024/1987. Official Journal instrument establishing nickel maximum levels and application dates. · eur-lex.europa.eu

[4] Heavy Metal Index — EU nickel maximum levels. Neutral structured schedule and product-scope reference. · heavymetalindex.com

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