PJRFSI UK INSIGHT SERIES

3-MCPD, 3-MCPDE & GLYCIDYL ESTERS

UK FOOD INDUSTRY READINESS GUIDE

What the 2026 EU changes mean for Great Britain, Northern Ireland, EU-bound supply chains and BRCGS-aligned food safety systems

INSIDE THIS WHITE PAPER

A practical, UK-focused guide to the 2026 regulatory changes, the GB/NI legal landscape, analytical testing issues, supplier controls, HACCP considerations, audit-readiness questions and a 90-day readiness plan. The paper is designed to be saved, circulated internally and used as a discussion tool with technical, quality, procurement and operations teams.

Audience	Best used for
UK food manufacturers, ingredient suppliers, importers, retailers, brand owners and technical teams	Internal review, supplier assurance, product compliance, laboratory strategy, HACCP review, management review and BRCGS readiness

Prepared for the UK market | October 2026

PJRFSI | Food Safety Certification & Assurance Resources

Executive summary

A technical issue that is becoming a management-system issue

Three process contaminants - 3-monochloropropanediol (3-MCPD), 3-MCPD fatty acid esters (3-MCPDE) and glycidyl fatty acid esters (GE) - are moving from a specialist laboratory topic into a broader product-compliance and supply-chain assurance issue. The change is especially relevant to businesses that use refined vegetable oils, fish oils or other marine oils in foods with more than 5% fat, and to businesses serving infant and young-child food markets.

On 29 July 2026, the European Commission adopted Regulation (EU) 2026/1825, amending Regulation (EU) 2023/915. The regulation is in force in the EU and introduces new maximum levels for certain compound foods and baby/infant food categories, while lowering some limits for oils intended for baby-food production. The first new compound-food requirements apply from 19 August 2026; additional requirements for baby food and relevant input oils apply from 1 January 2027. [1]

For UK businesses, however, the regulatory story is not simply "the EU changed its limits, therefore the UK changed too". The legal position still differs between Great Britain and Northern Ireland, while preparations for a UK-EU SPS agreement are moving from policy discussion toward operational readiness for a potential mid-2027 implementation. [2][3][9]

That distinction creates a practical compliance challenge. A UK manufacturer may have one product but several compliance destinations: GB retail, Northern Ireland, EU export, or a customer specification that requires EU-

equivalent controls. A programme that manages only the legal minimum for the domestic GB market may therefore be commercially incomplete.

The second challenge is analytical. The revised EU framework defines the regulated GE measure in a way that takes account of glycidyl esters and certain related esters, and the compliance calculation for compound foods is expressed against the product fat content. This makes test-method selection, limit of quantification (LOQ), measurement uncertainty, and the ability to quantify both free and ester-bound 3-MCPD important when interpreting results. [1]

The most resilient response is therefore not a one-off test. It is a risk-based control system connecting regulatory intelligence, formulation data, supplier specifications, oil/fat provenance, HACCP, laboratory method selection, trend analysis and corrective action. That approach also fits the direction of modern food-safety assurance: BRCGS Food Safety Issue 9 already frames certification around product safety, legality, authenticity and quality, while Issue 10 is currently being developed with explicit attention to new legislation, technology, supply-chain vulnerabilities and emerging risks. [5][6]

FIVE TAKEAWAYS FOR UK FOOD BUSINESSES

1) Know which legal regime applies to each destination. 2) Map where refined oils and fats enter your formulation. 3) Ask whether your laboratory method is genuinely fit for the matrix and regulatory definition. 4) Convert test data into supplier, process and HACCP controls - not just certificates. 5) Prepare now for a more connected GB/EU food-safety environment in 2027.

Key dates and signals

Date / period	Development	Why technical teams should care
19 Aug 2026	EU compound-food maximum levels begin to apply; no transitional arrangement is provided for those new levels. [1][5]	Products already in EU-facing supply chains need a documented compliance position, including formulation and testing evidence.
1 Jan 2027	EU baby-food and relevant input-oil limits change. [1][5]	Supplier specifications, purchasing controls, product testing and release criteria should be reviewed before the effective date.
Sept 2026 onward	UK NMP 2026/27 continues sampling edible oils for 3-MCPD alongside PAH, and identifies GE/3-MCPD esters in fish and marine oils. [4]	Shows that these contaminants are already part of the UK official-controls risk picture.
2026-2027	BRCGS Food Safety Issue 10 is under development and is planned for publication in 2027. [6][7]	Technical teams should expect continued evolution of expectations around risk, legislation, technology and supply-chain assurance.
Intended mid-2027	UK-EU SPS agreement is being prepared; exact timing and detailed requirements remain subject to negotiation. [2][3]	Future alignment could reduce divergence but may also require faster regulatory change-management.
10 Aug 2026	BRCGS Food Safety Issue 9 position statements (F926, version 4) became effective and are mandatory for sites. [11]	Audit preparation must use the current position statements as part of the applicable requirements, not just the base Issue 9 clauses.

Date / period	Development	Why technical teams should care
Sept 2026	FSA programme reporting confirms work toward the operational and policy changes needed for dynamic EU alignment by mid-2027. [9]	Regulatory change management needs to become faster and more structured; businesses should not wait for final implementation dates before mapping likely impacts.

October 2026 update: from regulatory change to implementation readiness

This October 2026 edition reflects the position now facing UK food businesses. The EU compound-food requirements introduced by Regulation (EU) 2026/1825 are no longer future requirements: they have applied since 19 August 2026 for the relevant EU categories. The next major date is 1 January 2027, when tighter limits for baby food, processed cereal-based foods and certain oils and fats intended for those products take effect. Affected businesses therefore have only a few months to close evidence gaps, update specifications and confirm testing arrangements. [1]

EU-facing products: implementation is already live. For a UK manufacturer exporting to the EU, supplying an EU customer, or operating a specification deliberately aligned to EU requirements, the compound-food limits should be treated as a current compliance criterion rather than a future watch item. The amended EU rules also make oil-blend composition and product fat content important inputs to the compliance assessment. [1][5]

Great Britain: policy alignment is becoming a change-management issue. The Food Standards Agency reported in September 2026 that it aims to have the necessary operational and policy changes in place for dynamic alignment with relevant EU SPS rules by mid-2027. This reinforces the need for a live legal register, destination matrix and documented regulatory-change process rather than an annual compliance review alone. [9]

BRCGS audit readiness: do not wait for Issue 10. BRCGS Food Safety Issue 9 remains the current standard, but the Issue 9 position statement document F926 became effective on 10 August 2026 and is mandatory for sites. The current version also records alignment work against the GFSI Benchmarking Requirements v2024. For UK sites preparing for audits in late 2026 and 2027, the practical priority is to verify that the latest position statements have been reviewed and translated into site actions. [11]

Issue 10 watch: BRCGS continues to develop the next Food Safety standard through its Technical Working Group. BRCGS describes the process as global, science-led and collaborative, while its 2025-26 annual reporting states that publication is planned for 2027. The precise final requirements and implementation timetable should not be presented as settled until BRCGS formally publishes them. [7][8]

October action point: technical managers should now classify each relevant SKU by destination, confirm exact oil and fat inputs and blend proportions, compare supplier specifications against the destination requirement, check

laboratory method scope and LOQ, and record the rationale for verification frequency. This creates an evidence trail that supports contaminant compliance as well as wider BRCGS-style control of legality, supplier assurance, change management and verification.

1. The issue in plain language

3-MCPD and glycidyl esters are not contaminants that a food business simply "adds" to a recipe. They can be formed during the high-temperature processing and refining of fats and oils. That makes control fundamentally different from a conventional ingredient-specification problem: the hazard is influenced by the raw material, refining conditions, processing history and, in some cases, the analytical method used to measure it.

3-MCPD may occur in free form and as fatty acid esters. Regulatory limits can therefore be expressed as a combined quantity, rather than treating free 3-MCPD and 3-MCPDE as two unrelated hazards. The 2026 EU amendment also defines the GE compliance measure around a sum that includes certain related esters. [1][5]

From an operational perspective, the important question is not simply "Do we test for 3-MCPD?" It is "Where could these contaminants enter or form in our product, what legal or customer requirement applies to us, and how do we demonstrate that our controls and test method are capable of answering that question?"

THE MANAGEMENT-SYSTEM SHIFT

A laboratory result is an outcome. A defensible food-safety system can explain the source of the risk, define the acceptance criterion, control the contributing inputs and processes, verify performance over time, and respond proportionately when results move toward or beyond a limit.

2. What changed in the EU in 2026?

Regulation (EU) 2026/1825 amends Regulation (EU) 2023/915. The amendment was published on 30 July 2026 and is in force. The regulation responds to additional occurrence data, especially for baby food and processed cereal-based food, and to enforcement difficulties around compound foods containing vegetable oils. [1]

The central regulatory change is the introduction of new maximum levels for categories that previously lacked an explicit limit or required more difficult interpretation. For compound foods containing more than 5% fat and added vegetable oils/fats and/or fish/marine oils, the maximum level for total 3-MCPD plus 3-MCPDE is differentiated according to the oil/fat profile. The corresponding GE limit is 1,000 µg/kg fat. [1]

Food / ingredient category	3-MCPD + 3-MCPDE (expressed as 3-MCPD)	GE (expressed as glycidol)	EU application date
Oils/fats, fish oils and other marine oils intended for baby-food production	750 -> 500 µg/kg	500 -> 250 µg/kg	1 Jan 2027
Baby food / processed cereal-based food for infants and young children	50 µg/kg product	25 µg/kg product	1 Jan 2027
Compound food >5% fat with specified oil/fat group 1	1,250 µg/kg fat	1,000 µg/kg fat	19 Aug 2026
Compound food >5% fat with other specified vegetable/fish/marine oils	2,500 µg/kg fat	1,000 µg/kg fat	19 Aug 2026

Food / ingredient category	3-MCPD + 3-MCPDE (expressed as 3-MCPD)	GE (expressed as glycidol)	EU application date
Infant formula / follow-on formula / certain foods for special medical purposes	80 µg/kg powder; 12 µg/kg liquid	50 µg/kg powder; 6 µg/kg liquid	Existing category retained in amended EU table

Note: The limits above summarise the EU legal text for orientation. Businesses should verify the exact product category, footnotes, oil composition and application date against the current regulation before making a conformity decision. [1]

Compound foods and the 5% threshold

For the newly regulated compound-food category, the EU measure applies to foods containing more than 5% total fat and added vegetable oils/fats and/or fish or other marine oils, subject to stated exclusions. This can capture finished foods that are not themselves oil products - for example bakery, snack or prepared foods - where the relevant oil is an ingredient. [1]

Oil-mixture calculation matters

Where different oils or fats are mixed, the applicable maximum can depend on the relative proportions of the oils/fats used. The regulation also addresses the situation in which the food business operator buying a mixture does not know the quantitative composition. That makes formulation and supplier-data quality part of contaminant control rather than a procurement afterthought. [1]

Fried coated meat and fish are treated separately

The EU amendment does not establish these particular new 3-MCPD limits for pre-fried and fried coated meat and fish because additional formation during frying has been identified and the contributing factors remain under assessment. [1]

Baby and infant foods are assessed differently

The revised framework distinguishes the treatment of compound foods from foods intended for babies, infants and young children; for the latter, the applicable limits are assessed against the product as placed on the market. [1]

3. What does this mean for the UK market?

The UK position needs to be split into Great Britain (England, Scotland and Wales) and Northern Ireland. That split is not a drafting technicality; it changes which legal requirements a business must assess.

Question	Great Britain	Northern Ireland
Does EU legislation automatically apply?	No. Directly applicable EU law no longer applies in GB; relevant retained EU law became assimilated law from 1 Jan 2024. [2]	Relevant EU food law continues to apply under the Windsor Framework. [3]
Does the 2026 EU amendment automatically become GB law?	Not simply because it is an EU regulation. GB applicability depends on UK law / future arrangements.	EU food law remains relevant in NI; businesses should assess the amendment through the Windsor Framework and applicable NI rules. [3][4]

Question	Great Britain	Northern Ireland
Does it matter for GB manufacturers anyway?	Yes, where products are exported to the EU, supplied to customers demanding EU equivalence, use dual-market specifications, or sit within integrated GB/NI supply chains.	Yes, particularly for products placed on the NI market or moving through EU-aligned food law.
What is the policy direction?	UK government intends a new SPS arrangement with the EU, expected mid-2027 subject to negotiations; stated plans include future GB alignment with relevant EU rules. [2]	NI continues to operate under the Windsor Framework alongside any broader UK-EU arrangement.

IMPORTANT DISTINCTION: LEGAL REQUIREMENT VS MARKET REQUIREMENT

A GB product can be legally saleable under current GB law while still failing an EU customer specification, an export requirement, or a retailer requirement. Conversely, a customer may contractually require compliance with an EU maximum even where the GB statutory position has not yet changed. The technical team should therefore maintain both a legal register and a customer/destination requirement matrix.

The UK official-controls picture is also worth watching. The 2026/27 UK National Monitoring Plan lists edible oils - including palm oil and other edible oils - for 3-MCPD and PAH sampling at medium priority. It also lists GE and 3-MCPD esters for fish oils and marine oils. The same guidance explicitly notes that GB assimilated law does not contain maximum levels for 3-MCPD esters for certain animal-fat/marine-oil categories, while EU and NI requirements are broader. [4]

That is a useful signal for UK businesses: official sampling, supply-chain controls and customer specifications can move ahead of a simple statutory-limit checklist. A mature technical function should monitor all three.

4. The UK trends behind the issue

Regulatory convergence with controlled divergence

Food businesses are increasingly managing a split landscape in which GB and EU rules can differ while supply chains remain interconnected. The planned SPS agreement raises the prospect of closer alignment, but the government has stated that negotiations and detailed requirements are still being finalised. [2]

More product-specific contaminant limits

The 2026 EU amendment is an example of a wider pattern: regulators are moving from broad contaminant provisions toward more granular product and population-specific limits where monitoring data supports them. This increases the need for product classification and formulation intelligence.

Analytical capability is becoming part of compliance strategy

When limits are low and measurements are influenced by method design, a certificate of analysis without method-suitability information may be insufficient for technical decision-making. Differences in analytical sensitivity, matrix applicability and the treatment of related analytes can materially affect the interpretation of GE results. [1]

Supply-chain assurance is shifting upstream

Companies increasingly need data about the oil itself: source, type, refining history, analytical trend, blend composition and specification. The finished-food manufacturer cannot reliably manage a contaminant that is invisible in the purchasing process.

BRCGS Issue 10 and the next assurance cycle

BRCGS is currently developing Food Safety Issue 10, with work focused on emerging risks, new legislation, new technology, customer expectations, supply-chain vulnerabilities and audit gaps. The direction is relevant even before Issue 10 becomes an auditable requirement because technical teams can strengthen the underlying systems now. [6][7]

Testing is moving from "pass/fail" toward trend intelligence

As limits become more specific, trend lines can be more useful than isolated results. A result below a legal limit but consistently rising may be a stronger early warning than a single result close to the historical mean.

5. Where do 3-MCPD, 3-MCPDE and GE enter the process?

The technical control strategy starts with understanding the pathway from oilseed or marine raw material to refined oil, ingredient, finished recipe and final processing. The exact formation chemistry is technical, but a food-safety team does not need to reproduce the full chemistry to manage the risk. It needs a clear control map.

Stage	What to control / document
Raw material profile	Origin, species, oil type, precursor profile and supplier processing practices can influence starting conditions.
Refining and high-temperature steps	Refining conditions can contribute to the formation of process contaminants. Supplier process controls and historical analytical data are therefore important.
Oil blending	Blends can introduce different contaminant profiles and may trigger different regulatory limits depending on their composition.
Finished-food formulation	The amount and type of oil used affect the potential concentration in the finished product and, for EU compound foods, can determine which fat-based limit applies.
Thermal processing	Further processing may influence contaminant formation. The EU specifically recognises additional formation concerns for certain fried coated meat and fish products. [1]
Laboratory method	The result reported can depend on which analytes are captured and how the method handles related esters and free forms. [5]

PRACTICAL HACCP PROMPT

Add a specific question to the hazard analysis: "Can 3-MCPD, 3-MCPDE or GE be introduced through any oil/fat ingredient or formed/increased during our process, and what evidence supports the chosen control measures?" The answer should be based on product, process and destination - not on a generic statement that "the supplier provides a CoA."

6. Supplier assurance: the control that many businesses underestimate

For many UK manufacturers, the strongest control point will be upstream. A finished-product laboratory programme can verify performance, but it cannot replace supplier controls where refined oils are a major source of contaminant risk.

A robust oil/fat specification should define, as applicable:

- identity and botanical/animal/marine origin of the oil or fat
- intended use and product category
- applicable 3-MCPD/3-MCPDE and GE limits, including destination-specific or customer-specific limits
- testing frequency and sampling basis
- analytical method or minimum method-performance requirements
- LOQ expectations relative to the acceptance limit
- measurement uncertainty / decision rule where a formal conformity statement is required
- change-notification requirements for refining process, supplier, source, blend or specification
- certificate-of-analysis content and traceability to the delivered lot
- retention of trend data where supplier performance is risk-critical.

Supplier approval questions for procurement and technical teams

1. What type of refining is applied and where are the main high-temperature steps?
2. Can the supplier provide recent trend data rather than a single representative result?
3. Is the test performed on the oil before delivery, on the finished product, or both?
4. Which analytical method is used and what are the LOQs for free and ester-bound analytes?
5. How does the laboratory account for the regulatory definition of GE in the destination market?
6. Can the supplier provide the quantitative composition of an oil blend where that information affects the applicable maximum?
7. What happens when a result is atypical but below the legal limit?
8. How are changes to raw material origin, refining site or process communicated?

7. Testing strategy: asking the right laboratory question

A central lesson for technical teams is that analytical compliance is not simply a matter of ordering a test named "3-MCPD + GE." The laboratory method needs to match the product matrix, fat content, regulated analytes, target limit and required reporting basis.

Define the regulatory measurand first

Confirm whether the applicable requirement is expressed as total 3-MCPD plus 3-MCPDE, GE expressed as glycidol, or the broader sum required by the amended EU definition. Do not assume a legacy test package maps exactly onto a revised legal definition. [1][5]

Understand the fat basis

For EU compound foods over 5% fat, maximum levels are expressed per kg fat. The product result may therefore need conversion using the labelled or analytically determined fat content. [1][5]

Check the LOQ against the decision you need to make

An LOQ that is adequate for screening may not be adequate for a conformity statement when the regulatory limit is low. The method should be demonstrably capable of resolving results at a useful margin below the applicable threshold. [5]

Ask how measurement uncertainty is used

Where conformity is being assessed, the laboratory should make the decision rule transparent. LOQ and measurement uncertainty can materially affect the conformity decision and should therefore be understood before results are used for release or compliance statements.

Check the matrix scope

Methods validated for refined oil may not automatically be appropriate for a complex compound food with low fat content. Method scope should be checked against the actual food matrix, fat content and the need to quantify free and ester-bound analytes.

Protect comparability

Use consistent method families and laboratory arrangements where possible so that trends are meaningful. When changing laboratory or method, perform a documented comparability review.

Method family / representative approach	Indicative LOQ	Typical application	Key management consideration
ISO 18363-1 / AOCS Cd 29c-13 / DGF C-VI 18(10), combined approach	~150 µg/kg	Higher-fat food matrices (>15% fat)	Lower sensitivity than lower-LOQ approaches; understand how GE calculation and uncertainty are derived. [5]
ISO 18363-2 / AOCS Cd 29b-13	~100 µg/kg	Food matrices with >10% fat	Longer hydrolysis approach; precision and method scope should be confirmed for the intended matrix.
Low-LOQ approach combining ISO 18363-2 principles with direct free-analyte determination	~10 µg/kg for esters; ~5 µg/kg for free forms (illustrative low-LOQ approach)	Lower-fat foods (<=10% fat)	More labor-intensive but better sensitivity; confirm scope and validation for the actual matrix. [5]

The table above summarises representative analytical approaches. It is not a laboratory endorsement or a statement that one method is universally appropriate. Method selection remains matrix- and regulatory-definition-specific. [1]

LABORATORY REQUEST TEMPLATE

When sending a sample, provide the full labelled product or, at minimum, the product name, intended market, fat content, complete ingredient list and information on added oils/fats and their proportions where known. Incomplete product information can prevent a laboratory from making a robust compliance assessment.

8. The data package a technical manager should be able to retrieve

- Current legal requirement by destination: GB / NI / EU / customer-specific.
- Product classification and reason the maximum level applies.
- Full formulation and oil/fat contribution, including percentages.
- Supplier specification for each high-risk oil/fat.
- Supplier CoA and trend history where available.
- Laboratory method, LOQ and uncertainty.
- Raw laboratory report linked to lot / batch identity.
- Fat-content basis used for any fat-normalised calculation.
- Decision rule used for release or conformity statement.
- HACCP hazard assessment and control measures.
- Nonconformance, CAPA and effectiveness review history.
- Change-control evidence for new suppliers, new oil sources, formulation changes and process changes.

9. Connecting contaminant control to BRCGS-aligned systems

This white paper is not a substitute for the BRCGS Global Standard Food Safety or its interpretation guidance. It is a practical bridge between contaminant-specific regulatory change and the management-system disciplines that BRCGS certification expects sites to maintain.

BRCGS describes Food Safety Issue 9 as a framework for managing product safety, integrity, legality and quality, with operational controls in food manufacturing, processing and packing. BRCGS has also stated that Issue 10 is being developed with consideration of emerging food-safety concerns, new legislation, new technology, customer expectations and supply-chain risk. [5][6]

System area	3-MCPD / GE readiness question	Evidence a site should be able to show
Legal and regulatory review	How does the site identify changes in GB, NI, EU and customer requirements?	Current legal register; regulatory watch log; destination matrix; review dates and responsibilities.
Hazard analysis / HACCP	Has the site assessed oils/fats and process conditions as a potential source or formation route?	Hazard rationale; supplier data; process flow; risk assessment; control measures and verification.
Supplier approval	Are high-risk oils/fats sourced against a defined specification?	Approved supplier list; specification; audit/questionnaire; CoA requirements; change notification.
Specification management	Are internal and customer limits aligned to the correct destination?	Raw-material and finished-product specifications; version control; customer requirements.
Testing and verification	Does the sampling plan reflect risk and the actual regulatory measurand?	Sampling plan; methods; LOQ; uncertainty; trend charts; laboratory competence evidence.
Nonconformity and CAPA	What happens when a result is atypical, borderline or fails?	Containment; root cause; lot disposition; corrective action; effectiveness verification.

System area	3-MCPD / GE readiness question	Evidence a site should be able to show
Food safety culture	Do procurement, technical, production and operations teams understand why the control matters?	Training; toolbox talks; objectives; communications; evidence of escalation and learning.
Change management	What triggers a re-assessment?	Oil supplier change; blend change; formulation change; refinery change; process-temperature change; market change.
Management review	Is contaminant performance visible at the right level?	KPI / trend summary; incidents; supplier performance; resource needs; decisions and actions.

AUDIT INTERVIEW QUESTION

Ask a site representative: "Show me how you would know if the 3-MCPD / GE requirement for one of your key products changed tomorrow." A mature answer should trace from regulatory intelligence to product classification, specification, supplier communication, HACCP review, testing and controlled implementation - not stop at "quality would tell us."

10. Why BRCGS Issue 10 should already be on the radar

BRCGS is actively developing Food Safety Issue 10. As of October 2026, Issue 9 remains the current auditable standard, but the mandatory Issue 9 position statements effective from 10 August 2026 should already be built into audit preparation. [6][7][8][11]

The significance for contaminant management is not that any one contaminant is guaranteed to receive a new clause. The broader lesson is that standards are increasingly designed around demonstrable risk control. Businesses that build strong evidence chains now - from regulatory change to preventive control to verification - will be better positioned to absorb future revisions, regardless of the final wording of Issue 10.

11. UK readiness diagnostic: 20 questions for technical and quality teams

01. Which of our finished products contain more than 5% fat and added vegetable or marine oils?

02. Which products are sold in GB, NI, the EU, or to customers requiring EU-equivalent criteria?

03. Which oils/fats are refined and therefore potentially relevant to 3-MCPD/GE control?

04. Do we know the percentage contribution of each relevant oil/fat in every high-risk finished product?

05. Do we know the composition of any oil blend purchased from a supplier?

06. Are supplier specifications written against a named legal/customer limit?

07. Do supplier CoAs identify the lot and test date?

08. Do we trend supplier results over time?

09. Do we know which laboratory method is used?

10. Is the LOQ appropriate for the acceptance limit and matrix?

11. Does the method capture the analytes required by the applicable legal definition?
12. Is measurement uncertainty addressed in the laboratory decision rule?
13. Do we know the fat content used for a fat-normalised result?
14. Can we reproduce the calculation from the raw lab result to the reported µg/kg fat result?
15. Is 3-MCPD / GE explicitly considered in the relevant hazard analysis?
16. Do changes to oil supplier, source or refining process trigger a re-assessment?
17. Does procurement know which technical changes require notification?
18. Do production teams understand which process conditions could influence risk?
19. Do nonconformity and CAPA procedures distinguish source contamination from process formation?
20. Can senior management see the trend, open actions and emerging regulatory obligations?

12. A practical 90-day readiness plan

Days	Priority actions	Outputs
0-15	Build the product/destination map; identify products with relevant oil/fat inputs; identify NI/EU exposure; identify current legal and customer criteria.	Scope register; destination matrix; initial gap list.
16-30	Review oil/fat supplier specifications, blend composition data, CoAs, analytical methods and historical results.	Supplier evidence pack; data gaps; high-risk supplier list.
31-45	Review HACCP / food-safety plans for relevant hazards and process steps; confirm formulation data and fat basis.	Updated hazard assessment; documented rationale; calculation template.
46-60	Review laboratory strategy: matrix scope, LOQ, method definition, uncertainty, sampling frequency and release rules.	Approved test specification; laboratory request template; sampling plan.
61-75	Run targeted verification testing and supplier follow-up where evidence is weak or trends are changing.	Trend baseline; supplier actions; technical conclusions.
76-90	Complete CAPA and change-control updates; brief procurement/production; present trends and regulatory actions to management.	Management-review pack; training record; action closure; 2027 readiness plan.

13. What to do when a result is above the limit - or simply looks wrong

A result should trigger a controlled technical assessment rather than an automatic conclusion. The first question is whether the correct legal category and test method were used. The second is whether the sample is representative and traceable. The third is whether the result indicates a supplier issue, a process issue, a formulation issue, an analytical issue, or a combination.

1. Place the affected lot / finished product into controlled status where appropriate.
2. Confirm product destination and the exact applicable criterion.

3. Confirm the laboratory method, LOQ, uncertainty and sample basis.

4. Reconcile the result with the recipe, fat content and relevant oil lots.

5. Review supplier results and changes for the contributing oil/fat.

6. Assess whether additional sampling or confirmatory analysis is justified.

7. Determine product disposition using the applicable legal/customer requirements and the company decision rule.

8. Complete root-cause analysis and CAPA where a systemic cause is identified.

9. Feed lessons learned into supplier approval, HACCP, testing and change control.

DO NOT LOSE THE DATA TRAIL

For technical defensibility, retain the link between finished-product result, batch, recipe version, oil/fat lots, supplier CoA, laboratory method, fat-content basis and final disposition. This evidence chain is often more valuable during an investigation than a single standalone certificate.

14. Where UK businesses may encounter the issue

Business area	Potential exposure	Questions to ask
Bakery and cereal products	Refined vegetable oils in higher-fat finished goods; EU compound-food rules may become relevant depending on formulation and destination.	What oil is used? What is the product fat %? Which market is the product sold into?
Snacks and savoury foods	Frying oils and refined fats can be a significant input; supplier and process controls both matter.	Are oil changes controlled? Do we monitor supplier trend data?
Infant / baby food	Tighter product and input-oil limits in the EU from Jan 2027.	Are raw-material limits and finished-product limits mapped separately?
Functional / nutrition products	Complex formulations may use several added fats/oils; product classification and customer specifications can vary.	Can the quantitative oil blend composition be demonstrated?
Imported food / ingredients	UK official monitoring includes 3-MCPD in edible oils and GE/3-MCPD esters in fish/marine oils. [4]	Do import controls target the actual risk and destination requirements?
Retailers / brand owners	Customer codes can require tighter specifications than the base legal requirement.	Are retailer specifications tracked separately from law and linked to product release?

15. A management dashboard for contaminant control

A useful KPI set should help management see deterioration early rather than merely record failures. Example measures include:

- Percentage of relevant products with confirmed destination-specific legal classification.

- Percentage of high-risk oil suppliers with current contaminant specifications.
- Percentage of high-risk suppliers providing trend data rather than isolated CoAs.
- Percentage of tests meeting an internal warning threshold below the legal/customer limit.
- Number of results requiring investigation / confirmatory analysis.
- Number of supplier changes processed through formal change control.
- Age of open CAPA linked to contaminant results.
- Percentage of laboratory reports received with sufficient product and formulation information for conformity assessment.

Internal warning thresholds should be risk-based and should not be presented as legal limits. Their purpose is to provide time for investigation and corrective action before a statutory or customer limit is breached.

16. Frequently asked questions

Does the 2026 EU regulation automatically change the law in Great Britain?

No. Directly applicable EU law no longer applies in GB, and the 2026 regulation does not simply become GB law because it is an EU regulation. Businesses still need to assess EU customer/export requirements and future UK alignment plans. [2][3]

Does this mean UK manufacturers can ignore the EU limits?

No. A GB manufacturer may still need to meet the EU limits when placing product on the EU market, supplying an EU customer, or working to a customer specification that adopts EU criteria. Northern Ireland has a different legal position under the Windsor Framework. [3][4]

Can a supplier CoA demonstrate finished-product compliance?

Not by itself. A supplier result can be evidence for an ingredient control, but finished-product compliance also depends on formulation, oil proportion, product fat content, processing and the correct analytical definition.

Why can two laboratories produce different GE results?

The revised analytical framework recognises that method design can affect which related esters contribute to the reported GE value. Laboratory method selection and comparability therefore matter. [1]

Is a lower numerical result always "safer"?

For compliance, lower concentrations are generally further from a maximum level, but technical teams should interpret results within the uncertainty, method capability, sampling plan and product context. Avoid over-interpreting a single result.

What should auditors ask about this topic?

They should be able to trace the site approach from legal/customer requirement, product risk and supplier controls through verification, results, deviations and corrective action. This white paper provides example questions; the applicable certification standard and audit protocol remain the controlling documents.

17. Conclusion: treat the change as a readiness issue, not just a laboratory issue

The 2026 EU amendment is significant because it combines tighter limits, new product categories, clearer rules for compound foods and a more explicit analytical definition. Its practical effect is to increase the importance of product classification, formulation data, supplier assurance and analytical capability. [1]

For UK businesses, the most important step is to replace a single-market view with a destination-aware compliance model. Great Britain, Northern Ireland, EU exports and customer specifications can create different requirements. The UK's proposed SPS arrangements may reduce some divergence in future, but the government has emphasised that detailed implementation and timing remain subject to negotiation. [2]

The businesses best prepared for the next change will not necessarily be those that run the most tests. They will be the ones that know why they are testing, what the result means, where the risk originates, what evidence proves control, and how quickly they can update their system when the requirement changes. That is the core of a modern, risk-based food safety management system.

PJRFSI PRACTICAL MESSAGE

Regulatory change becomes manageable when it is translated into controlled processes: scope the requirement, map the product, control the supplier, choose a fit-for-purpose method, trend the result, document the decision and close the loop through management review. The same discipline supports resilience across certification standards and customer programmes.

How PJRFSI Can Support Your BRCGS Food Safety Journey

As regulatory expectations continue to evolve, food businesses need food safety systems that can identify emerging risks, maintain effective controls and demonstrate ongoing compliance. For organisations responding to changing requirements around 3-MCPD, 3-MCPDE and glycidyl esters, this includes ensuring that regulatory and product risks are reflected in the wider food safety management system.

Perry Johnson Registrars Food Safety, Inc. (PJRFSI) supports food businesses seeking certification to the BRCGS Global Standard for Food Safety. BRCGS certification provides a structured framework for managing food safety, product integrity, legal and customer requirements, supplier controls, verification activities and continual improvement.

PJRFSI can assist organisations in preparing for and maintaining BRCGS Food Safety certification by providing an independent assessment of their food safety systems against the applicable certification requirements. For businesses reviewing their controls in response to regulatory change, certification can form an important part of demonstrating that food safety processes are systematic, risk-based and effectively implemented.

If your organisation is reviewing its food safety arrangements or preparing for BRCGS certification, contact PJRFSI to discuss your certification requirements and how the BRCGS framework can support your food safety and compliance objectives.

About this white paper

This white paper provides a practical UK food-industry interpretation of the 2026 changes affecting 3-MCPD, 3-MCPDE and glycidyl esters. It is intended as an educational and operational resource for food manufacturers, importers, retailers, technical teams and certification stakeholders.

It is not legal advice, laboratory advice or an audit finding. Organisations should verify the exact legislation, product category, destination and customer requirements that apply to their own products. Certification decisions remain governed by the applicable certification scheme, programme rules, audit protocol and legal requirements.

KEEP THIS PAPER - AND USE IT IN YOUR NEXT REVIEW

Use the questions and evidence lists in this paper as a starting point for technical meetings, supplier reviews, HACCP review, internal audit preparation and management review. For certification programme information, training resources and food-safety assurance support, engage with PJRFSI / PJRFSL through its official channels.

References

[1] European Commission / EUR-Lex: Commission Regulation (EU) 2026/1825 of 29 July 2026 amending Regulation (EU) 2023/915 as regards maximum levels of 3-MCPD, 3-MCPD fatty acid esters and glycidyl fatty acid esters in certain foods. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202601825

[2] GOV.UK / Defra: Food manufacturing, processing and standards: preparing your business - updated 30 July 2026. Includes current information on the intended UK-EU SPS agreement and future alignment approach. https://www.gov.uk/government/publications/sps-agreement-preparing-your-business/food-manufacturing-processing-and-standards-preparing-your-business

[3] Food Standards Agency / GOV.UK: General food law - current GB and NI distinction, including the ongoing application of EU food law in Northern Ireland. https://www.gov.uk/government/publications/general-food-law/general-food-law

[4] Food Standards Agency / GOV.UK: UK National Monitoring Plan sampling priorities for imported foods: 2026/2027 - updated 9 September 2026. https://www.gov.uk/government/publications/uk-national-monitoring-plan-sampling-priorities-for-imported-foods/uk-national-monitoring-plan-nmp-sampling-priorities-for-imported-foods-20262027

[5] BRCGS: Global Standard Food Safety - current overview and scope. https://www.brcgs.com/our-standards/food-safety

[6] BRCGS: Join the Technical Working Group for Food Safety, Issue 10 - published January 2026. https://www.brcgs.com/about-brcgs/news/2026/food-10-twg

[7] BRCGS: Behind the scenes of Food Safety Issue 10 - published 11 August 2026. https://www.brcgs.com/about-brcgs/news/2026/behind-the-scenes-of-food-safety-issue-10

[8] BRCGS: Annual Report 2025-26 - forward look stating that Food Safety Issue 10 is planned for publication in 2027. https://www.brcgs.com/media/bnqbawek/brcgs-annua-lreport-2025-26-final.pdf

[9] Food Standards Agency / GOV.UK: Progress against the economic growth goals - September 2026 FSA Business Committee reporting, including preparation for dynamic alignment by mid-2027. https://www.gov.uk/government/publications/food-standards-agency-business-committee-meeting-september-2026/progress-against-the-economic-growth-goals

[11] BRCGS: F926 Position Statements for Issue 9, version 4, effective 10 August 2026; mandatory position statements and alignment with GFSI Benchmarking Requirements v2024. https://www.brcgs.com/media/tg2jwv0h/f926-position-statements-for-issue-9-v4-27-04-2026-effective-10-august-2026.pdf

Information reviewed: 5 October 2026