



Animal &
Plant Health
Agency

APHA Briefing Note 38/25

Notification of introduction of maximum levels of inorganic arsenic in fish and other seafood exported to EU states, commission Regulation 2025/1891

Date issued: 09 October 2025

Purpose

To notify certifiers of the introduction of new maximum levels (MRL) for inorganic arsenic for fish and other seafood by the European Union commission.

Background

The European Commission published Commission Implementing Regulation (EU) [2025/1891](#) amending Annex I to Commission Regulation (EU) [2023/915](#) this in turn affects three fish Products (POAO) Export Health Certificates (EHCs) and one live bivalve mollusc POAO EHC.

These new changes will take effect from the **08 October 2025**.

Taking into account that certain foodstuffs covered by this Regulation have a long shelf life and in order to prevent food waste, fish and other seafood that were lawfully placed on the market in the EU before the date of entry into force of the aforementioned Regulation are allowed to remain on the market until their date of minimum durability or use-by date.

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

Annex I shows the list of products affected by Commission Implementing Regulation (EU) 2025/1891.

Action

- From **08 October 2025**, traders should ensure that any of the commodities listed in annex I below for export from GB to the EU or movement to Northern Ireland meet the new MRLs.
- For live bivalve molluscs certifying officers may certify the attestation based on the official controls.
- Certifying Officers may certify compliance with the new MRLs for fishery products based on previous [UK] monitoring of live animals from wild catch. The plan is based on passive surveillance and business led testing relying on previous surveys conducted, which showed the risk to public health to be negligible, with predictable and non-significant levels

Further Information

APHA's Centre for International Trade – Carlisle:

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Telephone- 03000 300 201

Annex I

List of affected commodities:

3.4.5	Muscle meat of the following fish:		The maximum level applies to the wet weight. Where fish are intended to be eaten whole, the maximum level applies to the whole fish. In case of dried, diluted, processed and/or compound food, Article 3(1) and (2) applies.
3.4.5.1	Species other than those listed under 3.4.5.2	0,10	
3.4.5.2	Anglerfish, monkfish and giant stargazer (<i>Lophius</i> species; <i>Kathetostoma giganteum</i>), flatfishes (<i>Pleuronectiformes</i> species), haddock (<i>Melanogrammus aeglefinus</i>), herring (<i>Clupea</i> species), ray (<i>Rajidae</i> species) and shark (all species).	0,50	
3.4.6	Crustaceans		The maximum level applies to the wet weight. The maximum level applies to muscle meat from appendages and abdomen, which means that the cephalothorax of crustaceans is excluded. In case of crabs and crab-like crustaceans (<i>Brachyura</i> and <i>Anomura</i>) the maximum level applies to the muscle meat from appendages. In case of dried, diluted, processed and/or compound food, Article 3(1) and (2) applies.
3.4.6.1	Crabs and crab-like crustaceans (<i>Brachyura</i> and <i>Anomura</i>), prawn and shrimps (all species).	0,10	
3.4.6.2	Crustaceans other than those listed under 3.4.6.1 and 3.4.6.3.	0,20	
3.4.6.3	Langoustine (<i>Nephrops norvegicus</i>) and rock lobster (<i>Jasus</i> species)	1,5	
3.4.7	Bivalve molluscs		The maximum level applies to the wet weight. In case of <i>Pecten maximus</i> , the maximum level applies to the adductor muscle and gonad only.

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			In case of dried, diluted, processed and/or compound food, Article 3(1) and (2) applies.
3.4.7.1	Scallops	0,10	
3.4.7.2	Bivalve molluscs other than those listed under 3.4.7.1	0,50	
3.4.8	Cephalopods	0,050	The maximum level applies to the wet weight. The maximum level applies to the animal without viscera. In case of dried, diluted, processed and/or compound food, Article 3(1) and (2) applies.
		Total arsenic	The maximum level for total arsenic applies to the products listed in 3.4.9.
3.4.9	Salt	0,50 '	

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