



Food Contact Material Recall Notifications-2024 Report 02

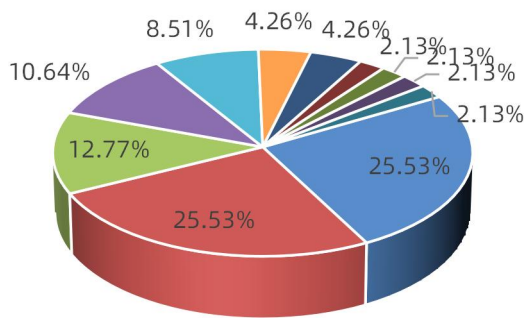
Food safety is closely related to the safety of food contact materials. With the rapid development of science and technology, the types of food contact materials are increasing, which undoubtedly brings new challenges to food safety. In order to meet these challenges, the European Union (EU) has implemented strict regulations on all types of food contact materials. The EU has also established an efficient early warning and notification system to ensure the safety of food contact materials.

This report summarizes the data in the second quarter of 2024, and there are 46 cases of notification information of food contact materials from the EU Rapid Warning System for Food and Feed (RASFF). Of these 46 cases, 25 cases involved China products, including one case from Hongkong, China. The specific analysis is as follows:

1. Analysis of the reason for the notification

The reasons for this bulletin mainly fall into four categories: the risk of harmful chemicals, sensory quality defects, the use of unauthorized substances and the lack of program documents. In this quarter, the notification caused by the risk of harmful chemicals accounted for the vast majority. Specifically, the number of notifications of excessive migration of metal elements and excessive migration of primary aromatic amines was the highest, 12 times each, accounting for 25.53% respectively; Followed by the migration of bisphenol A exceeded the standard for 6 times, accounting for 12.77%. See Figure 1 for details.

Figure1 Distribution chart of notification reasons



- The migration of metal elements exceeds the standard
- The migration of primary aromatic amines exceeds the standard
- The migration of bisphenol A exceeds the standard
- Overall migration exceeds the standard
- Melamine migration exceeds the standard
- Sensory quality defect
- Other reasons
- The migration of phthalate esters exceeds the standard
- Unauthorized substances are used in plastic products
- Formaldehyde migration exceeds the standard
- Lack of conformity declaration and test

◆ Reason for notification "ranking list"

■ **No. 1: Excessive migration of metal elements & excessive migration of primary aromatic amines (each accounting for 25.53%)**

Analysis : In this report, the problems of excessive migration of metal elements and excessive migration of primary aromatic amines are the most prominent, with 12 notifications each, each accounting for 25.53%. Excessive migration of metal elements in food contact materials may have many adverse effects on human body. Metal elements such as lead, cadmium, mercury and chromium, if ingested through food, may cause health problems such as nervous system damage, kidney damage and cancer risk. Primary aromatic amines are harmful chemicals, which can enter the human body through the skin, gastrointestinal tract and respiratory tract, which may cause changes in cell function and structure, and even cause cancer in severe cases. Among food contact materials, they mainly come from raw materials or additives containing such substances, such as some polyamide resins, inks and azo colorants. In order to protect consumers' health, the European Union has formulated a series of regulations and standards to strictly limit the migration of metal elements and primary aromatic amines in food contact materials.

■ **No. 2: The migration of bisphenol A exceeded the standard (12.77%)**

Analysis : Bisphenol A(BPA) is often used to make plastic and resin products, including some food contact materials. When the migration of bisphenol A in food contact materials exceeds the standard, it may enter the human body through food and drink, which may bring health risks such as endocrine interference, reproductive health problems and developmental impact. At present, the European Union is working to ban the use of bisphenol A in food contact materials to protect public health.

■ **No. 3: The overall migration exceeds the standard (10.64%)**

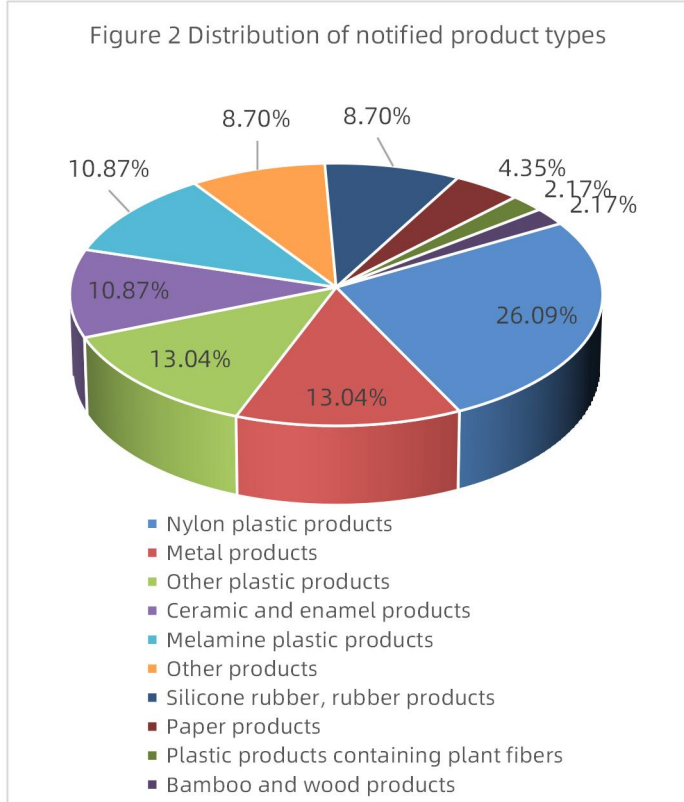
Analysis : Excessive overall migration means that the total amount of non-volatile substances migrated from food contact materials to food exceeds the limit set by the standard. These non-volatile migration substances may include heavy metals, organic compounds, additives, plastic monomers, colorants, stabilizers, fillers and so on. In order to protect public health, the European Union has formulated strict food contact standards and regulations to limit the migration of harmful substances in food contact materials.





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2. Analysis of the Products for the notification



◆ Materials and products for notification "ranking list"

■ No. 1: Nylon plastic products (26.09%)

Analysis: In this report, nylon plastic products mainly involve nylon kitchen tools and supplies, which were notified 12 times in total. These products are popular in the market because of their excellent mechanical strength, heat resistance and good wear resistance. However, it is worth noting that the polymerization monomer of nylon contains the composition of synthesizing primary aromatic amine, which is a chemical substance, and its excessive migration may affect human health. Therefore, nylon plastic products have a high risk in the migration of primary aromatic amines. Therefore, manufacturers and suppliers must take strict quality control measures to ensure that the migration of primary aromatic amines in products meets the standards, so as to ensure that products meet the export compliance requirements.

■ No. 2: Metal products & other plastic products (each accounting for 13.04%)

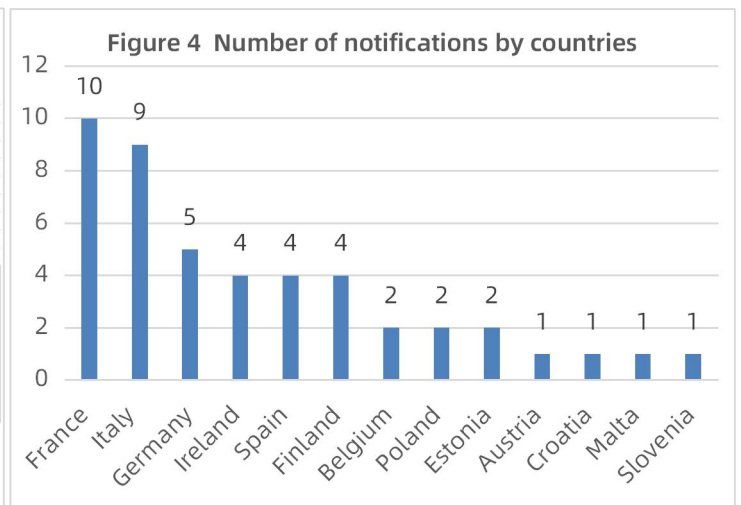
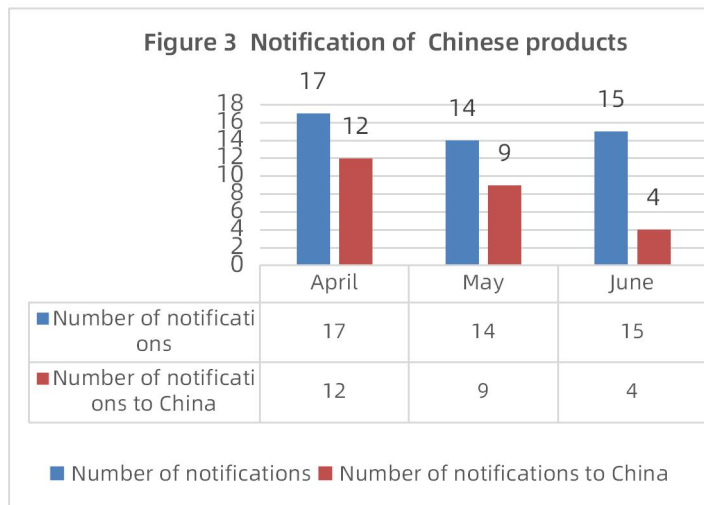
Analysis: In this report, the metal cooking pot kitchenware was notified 6 times because of the excessive migration of metal elements. This situation is usually caused by the use of substandard raw materials or improper process control in the production process. At the same time, all plastic products except nylon, melamine and plastic products containing plant fibers were also notified six times because of the excessive migration of bisphenol A and the total migration. These plastic products mainly include beverage bottles, plastic spoons and PP packages. Bisphenol A is a chemical commonly used in plastic products, and its excessive migration may affect human health.

■ No. 3: Ceramic and enamel products & melamine plastic products (each accounting for 10.87%)

Analysis: In this report, ceramics and enamel products were notified five times because of excessive metal migration, involving products such as ceramic plates, ceramic cups and enamel cups. In addition, melamine plastic tableware was also notified five times because of the excessive migration of melamine. Melamine plastic is a thermosetting plastic with melamine as the main component, which is often used to make tableware and other products. These circulars reveal the importance of strict supervision of raw materials and process control in the production process.

3. Analysis of the Countries for the notification

A total of 46 cases were notified, including 25 cases of products from China, accounting for 54.35%. In terms of countries that issued notifications, there were 13 countries in this quarter. Among them, France initiated notification with 10 cases, accounting for 21.74% of the total number of notifications, followed by Italy with 9 cases, accounting for 19.57% of the total number of notifications. See Figure 3& Figure 4 for details.





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Appendix: The relevant limit requirements of the notification of chemical risk :

Items	Law/Standard /Command	Limits	Material/Products
Overall migration	(EU)No 10/2011 and its amendments	10mg/dm ² or 60mg/kg	Plastic products
Specific migration of 19 metals		See the regulatory requirements for details	
Specific migration of primary aromatic amines		Not be detected	
Specific migration of phthalates		DBP: 0.12mg/kg; BBP: 6mg/kg; DEHP: 0.6mg/kg; DINP+DIDP: 1.8mg/kg; Sum(DBP+DIBP+BBP+DEHP)(calculated by DEHP): 0.6mg/kg; DAP: N.D.	
Specific migration of 2,2-bis (4- hydroxyphenyl) propane (BPA)		0.05mg/kg (It shall not be used to manufacture polycarbonate baby bottles, infant drinking cups or drinking bottles.)	
Use of unauthorized substances	(EU)No 10/2011 and relevant requirements of member states	Disable	Plastic products containing plant fibers
Specific migration of formaldehyde	(EU)No 10/2011 and its amendments (EU)No 284/2011	15mg/kg	Melamine plastic products
Specific migration of melamine		2.5mg/kg	
Arsenic	Fiche MCDA N°2 (V01-01/05/2016)	Not be detected	Ceramic, glass and enamel products
Aluminium		1mg/kg	
Cobalt		0.02mg/kg	

Referenced Websites:

- <https://webgate.ec.europa.eu/rasff-window/portal/?event=SearchForm&cleanSearch=1>





食品接触材料召回通报预警-2024年第2期

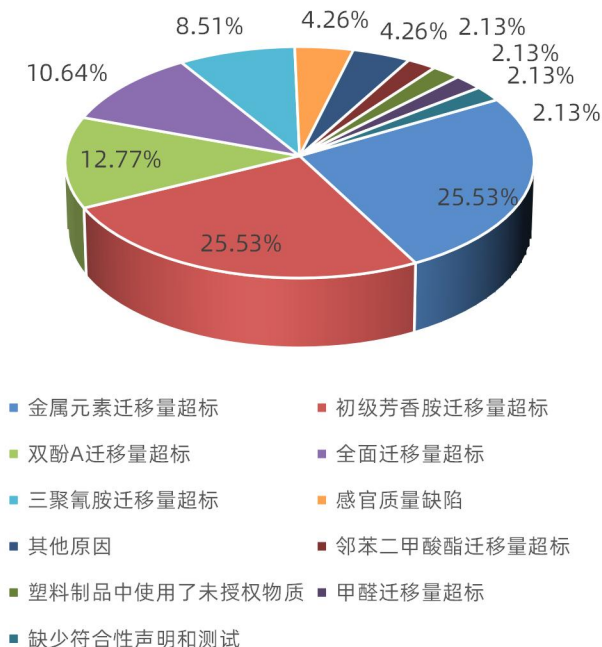
食品安全与食品接触材料的安全性紧密相连。随着科技的飞速发展，食品接触材料的种类不断增加，这无疑为食品安全带来了新的挑战。为了应对这些挑战，欧盟（EU）对所有类型的食品接触材料实施了严格的法规监管。欧盟还建立了一套高效的预警和通报系统，以确保食品接触材料的安全性。

本期报告汇总了2024年第2季度的数据，来自欧盟食品和饲料类快速预警系统（RASFF）的食品接触材料通报信息共计46例。在这46例中，有25例涉及中国产品，包括1例来自中国香港的产品。具体分析如下：

1. 通报原因分析

本期通报的原因主要归结为四大类：有害化学物质风险、感官质量缺陷、使用未授权物质和程序文件缺失。在本季度中，有害化学物质风险所引起的通报占据了绝大多数。具体而言，金属元素迁移量超标和初级芳香胺迁移量超标的通报数量最高，各12次，各占25.53%；紧随其后的双酚A迁移量超标，共6次，占比12.77%。详见图1。

图1 通报原因次数占比分布图



◆ 通报原因“排行榜”

■ No. 1: 金属元素迁移量超标&初级芳香胺迁移量超标（各占25.53%）

风险分析：本期通报中，金属元素迁移量超标和初级芳香胺迁移量超标问题最为突出，各通报12次，各占25.53%。食品接触材料中金属元素的迁移量超标可能对人体产生多种不利影响。金属元素如铅、镉、汞和铬等，如果通过食品摄入体内，可能引起神经系统损害、肾脏损伤和致癌风险等健康问题。初级芳香胺是有害化学物质，可通过皮肤、胃肠道和呼吸道进入人体，可能引起细胞功能和结构变化，严重时可能致癌。在食品接触材料中，它们主要来源于生产使用的含此类物质的原料或助剂，如某些聚酰胺树脂、油墨和偶氮类着色剂。为保护消费者健康，欧盟已制定一系列法规和标准，严格限制食品接触材料中金属元素和初级芳香胺的迁移量。

■ No. 2: 双酚A迁移量超标（占比12.77%）

风险分析：双酚A（BPA），常用于制造塑料和树脂产品，包括一些食品接触材料。食品接触材料中的双酚A迁移量超标时，可能会通过食物和饮料进入人体，从而带来内分泌干扰、生殖健康问题、发育影响等健康风险。当前，欧盟正致力于禁止食品接触材料中双酚A的使用，以保护公众健康。

■ No. 3: 全面迁移量超标（占比10.64%）

风险分析：全面迁移量超标是指从食品接触材料迁移到食品中的非挥发性物质总量超过了标准规定的限值。这些非挥发性迁移物质可能包括重金属、有机化合物、添加剂、塑料单体、着色剂、稳定剂、填料等。为了保护公众健康，欧盟制定了严格的食品接触标准和法规，限制食品接触材料中有害物质的迁移量。

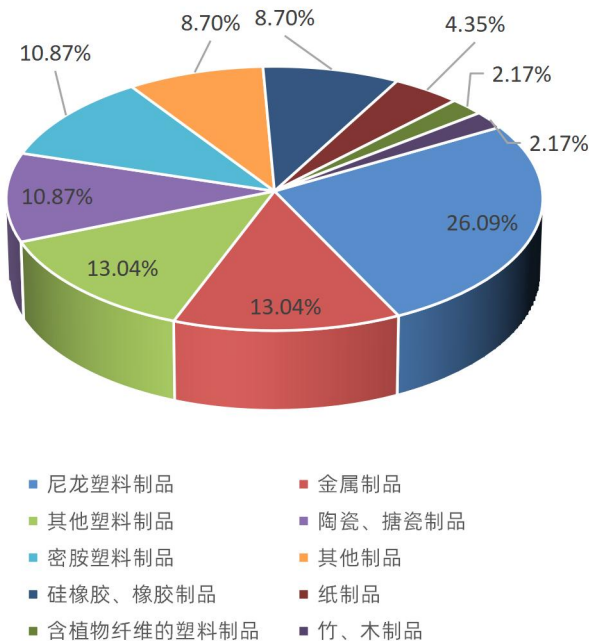




食品接触材料召回通报预警-2024年第2期

2. 通报产品分析

图2 通报产品类型分布图



◆通报产品类型“排行榜”

■ No. 1: 尼龙塑料制品 (占比26.09%)

风险分析: 在本期通报中, 尼龙塑料制品主要涉及尼龙厨房工具用品, 共被通报12次。这些产品因其卓越的机械强度、耐热性, 以及良好的耐磨性能而在市场上广受欢迎。然而, 值得注意的是, 尼龙的聚合单体含有合成初级芳香胺的成分, 这是一种化学物质, 其迁移量超标可能对人体健康造成影响。因此, 尼龙塑料制品在初级芳香胺迁移量方面存在较高风险。因此, 制造商和供应商必须采取严格的质量控制措施, 确保产品的初级芳香胺迁移量符合标准, 以保障产品满足出口合规性要求。

■ No. 2: 金属制品&其他塑料制品 (各占比13.04%)

风险分析: 在本期通报中, 金属烹饪锅厨具因金属元素迁移量超标而被通报6次。这种情况通常是由于使用了不合规的原材料或生产过程中工艺控制不当所致。同时, 除了尼龙、密胺和含植物纤维的塑料制品之外的所有塑料制品, 也因双酚A迁移量超标和总迁移量超标而被通报6次。这些塑料制品主要包括饮料瓶、塑料勺和PP包装件等。双酚A是一种常用于塑料制品中的化学物质, 其迁移量超标可能对人体健康造成影响。

■ No. 3: 陶瓷、搪瓷制品&密胺塑料制品 (各占比10.87%)

风险分析: 在本期通报中, 陶瓷和搪瓷制品因金属迁移量超标而被通报5次, 涉及的产品包括陶瓷盘、陶瓷杯和搪瓷杯等。此外, 密胺塑料餐具因三聚氰胺迁移量超标也被通报5次。密胺塑料是一种以三聚氰胺为主要成分的热固性塑料, 常用于制作餐具等产品。这些通报揭示了在生产过程中对原材料和工艺控制的严格监管的重要性。

3. 通报国家分析

本期通报案例共计46例, 其中, 来自中国的产品被通报案例共25例, 占比为54.35%。发布通报的国家方面, 本季度共有13个国家。其中, 最多的是法国, 发起通报10例, 占通报总数的21.74%, 其次是意大利, 发起通报9例, 占通报总数的19.57%。详见图3&图4。

图3 对华产品通报情况

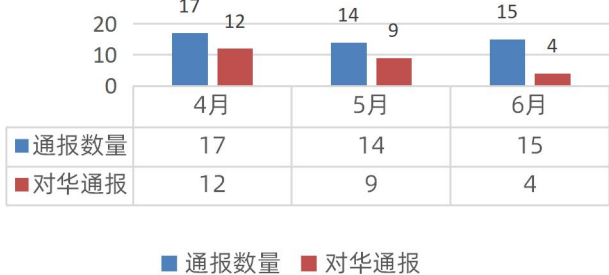
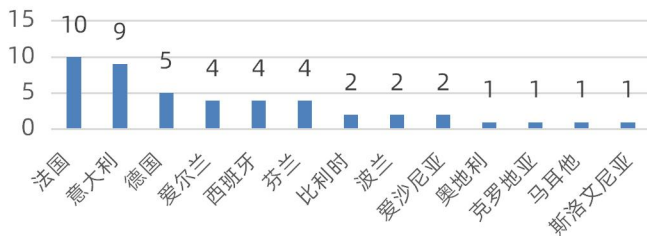


图4 各国通报数量





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项目名称	法规/标准/指令	限值	材料/产品
全面迁移	(EU)No 10/2011及其修订案	10mg/dm ² or 60mg/kg	塑料制品
金属迁移量19项		详见法规要求	
初级芳香胺迁移量		不得检出	
邻苯二甲酸酯迁移量		DBP: 0.12mg/kg; BBP: 6mg/kg; DEHP: 0.6mg/kg; DINP+DIDP:1.8mg/kg; 总和 (DBP+DIBP+BBP+DEHP) (以DEHP当量计):0.6mg/kg; DAP:N.D.	
2,2-二(4-羟基苯基)丙烷 (BPA) 迁移量		0.05mg/kg (不得用于生产制造聚碳酸酯婴儿奶瓶、婴幼儿饮水杯或水瓶)	
未授权物质	(EU)No 10/2011及成员国相关要求	禁用	含植物纤维塑料制品
甲醛迁移量	(EU)No 10/2011及其修订案; (EU)No 284/2011	15mg/kg	密胺塑料制品
三聚氰胺迁移量		2.5mg/kg	
砷	Fiche MCDA N°2 (V01-01/05/2016)	不得检出	陶瓷、玻璃及搪瓷制品
铝		1mg/kg	
钴		0.02mg/kg	

·参考网站:

- <https://webgate.ec.europa.eu/rasff-window/portal/?event=SearchForm&cleanSearch=1>

