Food Contact Material Recall Notifications-2025Report01

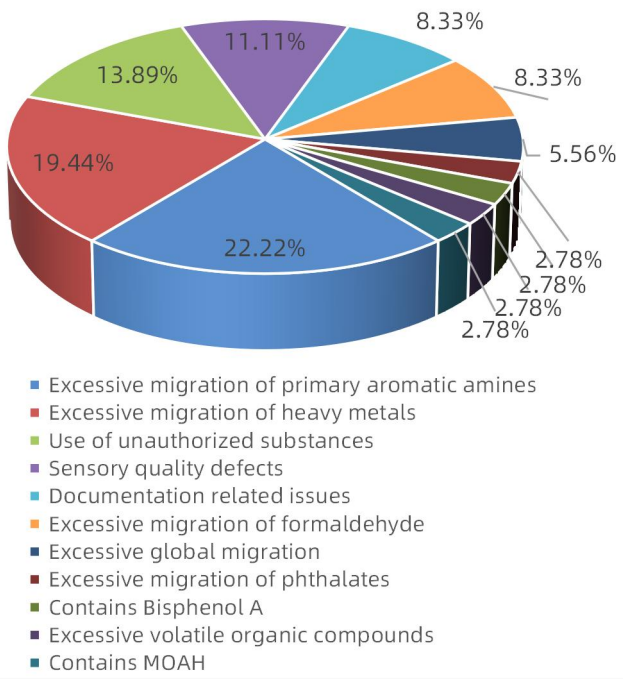
The safety of food contact materials is very important for food safety. With the continuous progress of science and technology, there are more and more kinds of food contact materials, and new safety problems also appear. The European Union (EU) has implemented strict laws and regulations on all kinds of food contact materials, and established an effective early warning and notification system. For illegal products, the EU will impose corresponding penalties.

In this issue, the notification information of food contact materials from the EU Rapid Warning System for Food and Feed (RASFF) in the first quarter of 2025 was summarized, with a total of 35 cases, of which 27 cases were directed at China products, including 2 cases from Hong Kong, China. The 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, the use of unauthorized substances, sensory quality defects and problems related to 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 primary aromatic amines was the highest, with a total of 8 times, accounting for 22.22%; Followed by the excessive migration of metal elements, a total of 7 times, accounting for 19.44%. See Figure 1 for details.

Figure1 Distribution chart of notification reasons



◆ **Reason for notification "ranking list"**

No. 1: The migration of primary aromatic amines exceeded the standard (accounting for 22.22%)

Analysis: In this report, the migration of primary aromatic amines in nylon kitchen utensils exceeds the standard seriously. This harmful substance can enter the human body through the skin, gastrointestinal tract and respiratory tract, and may cause changes in cell function and structure, and even cancer. It is mainly derived from the use of raw materials or auxiliaries containing such substances in production, such as polyamide resins and colorants, especially azo colorants.

No. 2: The migration of metal elements exceeds the standard (accounting for 19.44%)

Analysis: In this report, the problem of excessive migration of metal elements in metal and enamel products is more prominent. Excessive aluminum can harm nervous system and bone health; excessive manganese can cause neurological abnormalities, manifested as muscle stiffness, tremor and other symptoms; excessive iron may cause liver damage, metabolic disorders and increased risk of heart disease; excessive chromium, especially hexavalent chromium, is highly toxic, may cause skin allergies, respiratory diseases, and damage liver and kidney function. At present, the European Union has formulated strict regulations and standards to strictly limit the migration of metal elements in food contact materials to ensure the health and safety of consumers.

No. 3: Unauthorized substances were used (accounting for 13.89%)

Analysis: In this report of notification, the problem of unauthorized bamboo fiber mixed in plastic products is prominent. EU Food Contact Plastics Regulation (EU)No 10/2011 lists substances authorized for use, including monomers, additives, polymer production aids (excluding solvents), macromolecules obtained from microbial fermentation, etc. Bamboo, straw, sugarcane and other plant fibers are not included in this list of authorized materials, and such unauthorized substances cannot be used for the manufacture and processing of plastic food contact articles.

Consumer Testing Technology Co., Ltd. E-mail: enquiry@cttlab.com http://www.cttlab.com

Guangdong
(Dongguan/Shenzhen/Huizhou/Guangzhou/Zhongshan)
TEL: +86(0)769-8898 9888-884

Zhejiang
(Yiwu/Ningbo)
TEL: 0579-8998 6543

Fujian
(Quanzhou/Xiamen)
TEL: 0595-6809 9099

Hong Kong
TEL: +852 9319 8131

Hanoi, Vietnam
TEL: +84 024 3928 8688
E-mail: vn@cttlab.com

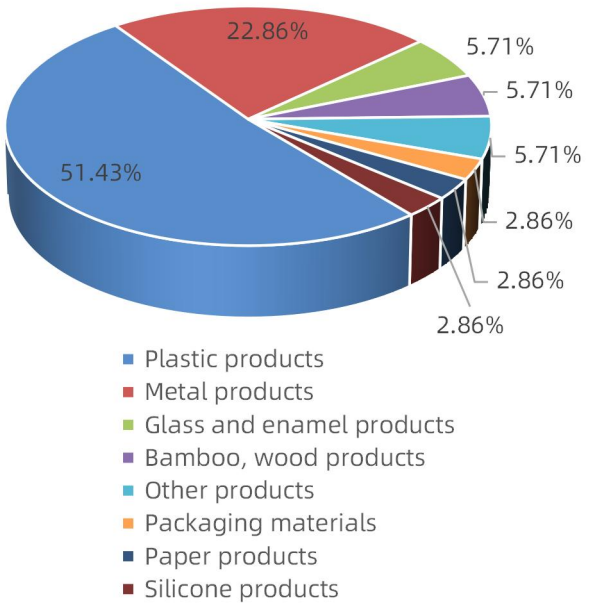
Linz, Austria
TEL: +43 670 1928192
E-mail: eu@cttlab.com

Vancouver, Canada
TEL: +1 778 288 5623
E-mail:north.america@cttlab.com

Food Contact Material Recall Notifications-2025Report01

2. Analysis of the Products for the notification

Figure 2 Distribution of notified product types



◆ **Materials and products for notification"ranking list"**

⚑ No. 1: Plastic products (51.43%)

Analysis: In this report, plastic products have been notified 18 times. The main reasons for notification are excessive migration of primary aromatic amines, use of unauthorized substances and excessive migration of formaldehyde. The product categories that were notified more were nylon kitchen utensils, plastic cups containing bamboo fibers and melamine tableware.

⚑ No. 2: Metal products (accounting for 22.86%)

Analysis: In this report, metal products have been notified 8 times in total, and the reasons for notification are mainly concentrated on excessive migration of metal elements and sensory quality defects. Among them, the sensory quality defects are coating peeling and product surface corrosion traces. The main product categories covered by the circular include stainless steel knives, frying pans and stainless steel thermos cups.

⚑ No. 3: Glass and enamel products & bamboo, wood products & other products (each accounting for 5.71%)

Analysis: Glass, enamel products, bamboo, wood products, and other products were notified twice in this report. The main reasons for notification of glass and enamel products are excessive migration of metal elements and sensory quality defects. The main product categories notified are enamel cups and glass containers; bamboo and wood products are mainly notified due to excessive migration of formaldehyde and problems related to procedure documents, while the main product categories notified are wooden cutting boards; other products include multipurpose baskets and biodegradable forks. Multipurpose baskets were classified as other products due to lack of relevant material information, and were judged unsuitable as food contact materials due to excessive overall migration; biodegradable forks were also notified due to excessive overall migration.

3. Analysis of the Countries for the notification

A total of 35 cases were reported in this issue, among which 27 cases were reported for products from China, accounting for 77.14%. In terms of countries issuing notifications, there were 14 countries in the quarter. Among them, Italy initiated 6 notifications, accounting for 17.14% of the total, followed by France and Germany, each initiating 5 notifications, accounting for 14.29% of the total.

Figure 3 Notification of Chinese products

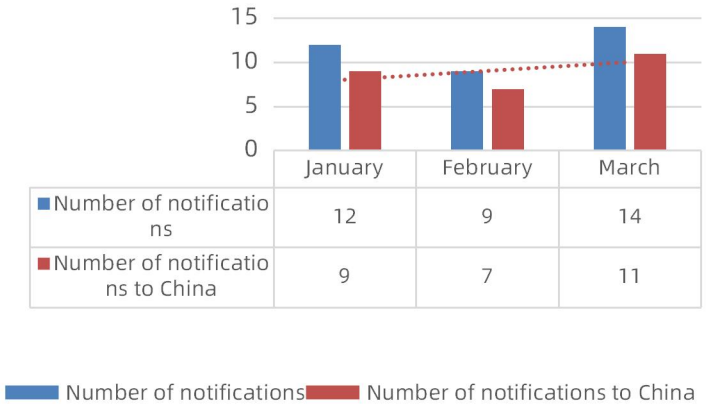
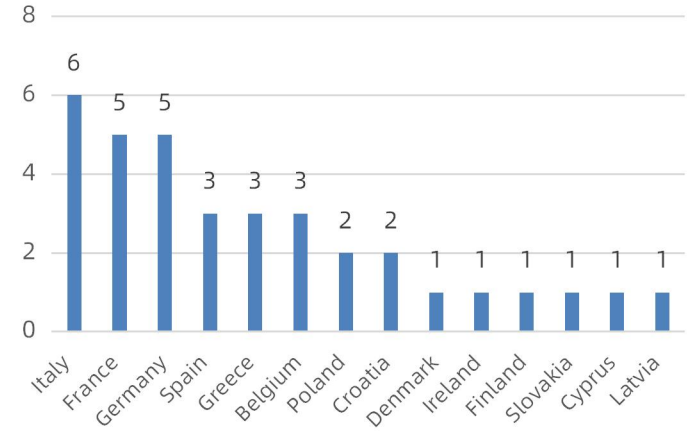


Figure 4 Number of notifications by countries



Food Contact Material Recall Notifications-2025Report01

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 Detected	
Specific migration of phthalates		See the regulatory requirements for details	
Use of unauthorized substances	(EU)No 10/2011 and its amendments	Prohibited	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	
Bisphenol A	(EU) 2024/3190	Prohibited	Food Contact Materials and Products
Arsenic	Fiche MCDA N°2 (V01-01/05/2016)	Not Detected	Ceramic, glass and enamel products
Aluminium		1mg/kg	
Cobalt		0.02mg/kg	
Release of 24 Metals	EDQM Technical Guide Resolution CM/Res(2020)9	See the guideline requirements for details	Metal and Alloy Products
Volatile substance content	BfR Recommendation XV	0.5%	Silicone rubber products
MOAH	Arrêté du 13 avril 2022	Mineral Oil Aromatic Hydrocarbons containing 1 to 7 aromatic rings: 1000 ppm (in ink); Mineral Oil Aromatic Hydrocarbons containing 3 to 7 aromatic rings: 1 ppm (in ink)	Packaging and Print Products
MOSH		Mineral Oil Saturated Hydrocarbons containing 16 to 35 carbon atoms: 1000 ppm (in ink)	

Referenced Websites:

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

Consumer Testing Technology Co., Ltd. E-mail: enquiry@cttlab.com http://www.cttlab.com

Guangdong
(Dongguan/Shenzhen/Huizhou/Guangzhou/Zhongshan)
TEL: +86(0)769-8898 9888-884

Zhejiang
(Yiwu/Ningbo)
TEL: 0579-8998 6543

Fujian
(Quanzhou/Xiamen)
TEL: 0595-6809 9099

Hong Kong
TEL: +852 9319 8131

Hanoi, Vietnam
TEL: +84 024 3928 8688
E-mail: vn@cttlab.com

Linz, Austria
TEL: +43 670 1928192
E-mail: eu@cttlab.com

Vancouver, Canada
TEL: +1 778 288 5623
E-mail:north.america@cttlab.com

食品接触材料召回通报预警–2025年第1期

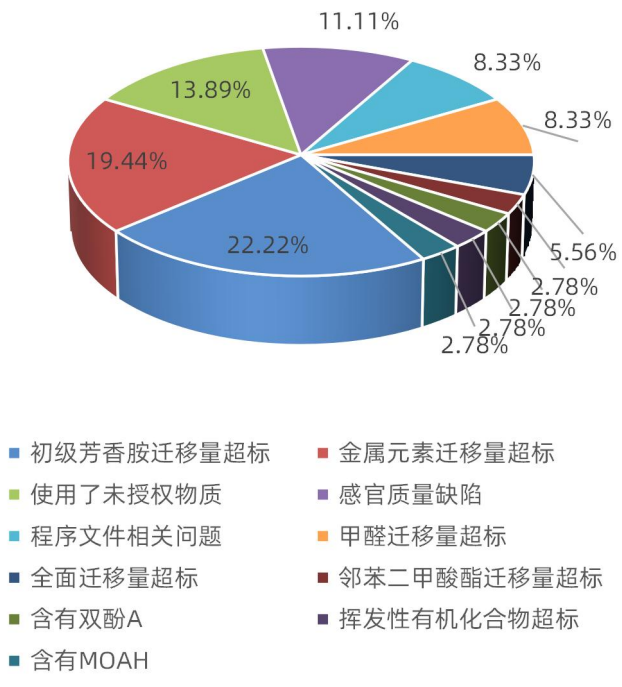
食品接触材料的安全性对于食品安全而言至关重要。随着科技的不断进步，食品接触材料的种类愈发繁多，新的安全问题也随之出现。欧盟（EU）对各类食品接触材料实行了严密的法规监管，并构建了一套行之有效的预警与通报体系。对于违规产品，欧盟将会施加相应的处罚手段。

本期汇总了2025年第1季度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35例，其中27例针对中国产品，包括2例中国香港的产品，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、使用未授权物质、感官质量缺陷和程序文件相关问题。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，初级芳香胺迁移量超标的通报数量最高，共计8次，占比22.22%；紧随其后的是金属元素迁移量超标，共7次，占比19.44%。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: 初级芳香胺迁移量超标（占比22.22%）

风险分析：本期通报中，尼龙餐厨具初级芳香胺迁移量超标问题严重。这种有害物质可通过皮肤、胃肠道和呼吸道进入人体，可能引发细胞功能和结构改变，甚至癌变。其主要源于生产中使用含此类物质的原料或助剂，如聚酰胺树脂和着色剂，尤其是偶氮类着色剂。

⚑ No. 2: 金属元素迁移量超标（占比19.44%）

风险分析：本期通报中，金属和搪瓷制品的金属元素迁移量超标问题较为突出。铝过量会危害神经系统和骨骼健康；锰超标会引发神经功能异常，表现为肌肉僵硬、震颤等症状；铁过量可能造成肝脏损伤、代谢紊乱以及增加心脏病风险；铬过量尤其六价铬，具有强毒性，可能引发皮肤过敏、呼吸道疾病，并损害肝肾功能。目前，欧盟已制定严格法规和标准，对食品接触材料中的金属元素迁移量进行严格限制，以保障消费者的健康安全。

⚑ No. 3: 使用了未授权物质（占比13.89%）

风险分析：本期通报中，塑料制品中混入了未授权的竹纤维问题突出。欧盟食品接触塑料法规(EU)No 10/2011，该法规列出了授权使用的物质清单，物质包括：单体、添加剂、聚合物生产助剂（不包括溶剂）、从微生物发酵中获得的大分子等。竹子、秸秆、甘蔗等植物纤维均不在此授权材质清单内，不可使用该类未授权物质进行塑料食品接触用品的制造和加工。

中鼎检测技术有限公司
E-mail：enquiry@cttlab.com http://www.cttlab.com

广东（东莞、深圳、惠州、广州、中山）
TEL：+86(0)769-8898 9888-884

浙江（义乌、宁波）
TEL：0579-8998 6543

福建（泉州、厦门）
TEL：0595-6809 9099

香港
TEL：+852 9319 8131

越南 河内
TEL：+84 024 3928 8688
E-mail：vn@cttlab.com

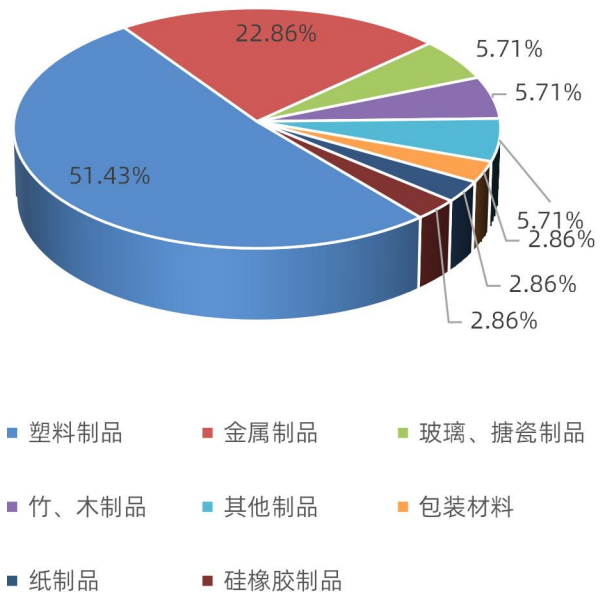
奥地利 林茨
TEL：+43 670 1928192
E-mail: eu@cttlab.com

加拿大 温哥华
TEL：+1 778 288 5623
E-mail:north.america@cttlab.com

食品接触材料召回通报预警–2025年第1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: 塑料制品（占比51.43%）

风险分析：本期通报中，塑料制品共被通报18次。通报的原因主要是初级芳香胺迁移量超标、使用了未授权物质和甲醛迁移量超标。而被通报较多的产品类别，主要是尼龙厨房用具、含竹纤维的塑料杯和密胺餐具。

⚑ No. 2: 金属制品（占比22.86%）

风险分析：本期通报中，金属制品共被通报8次，通报的原因主要集中在金属元素迁移量超标及感官质量缺陷。其中，感官质量缺陷表现形式为涂层脱落与产品表面腐蚀痕迹。通报涉及的主要产品类别包括不锈钢刀具、炒锅以及不锈钢保温杯。

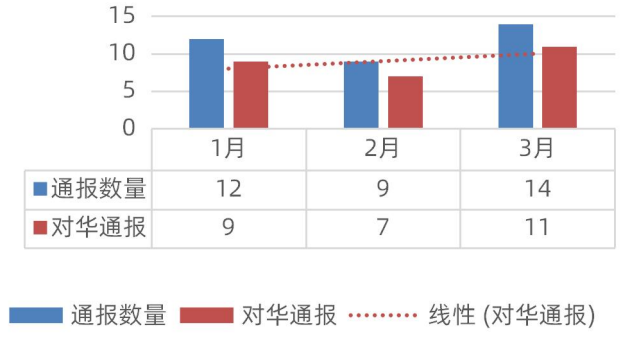
⚑ No. 3: 玻璃、搪瓷制品&竹、木制品&其他制品（各占比5.71%）

风险分析：本期通报中，玻璃、搪瓷制品，竹、木制品，以及其它制品均被通报 2 次。玻璃、搪瓷制品的通报原因主要是金属元素迁移量超标和感官质量缺陷，被通报的主要产品类别为搪瓷杯和玻璃容器；竹、木制品，其通报原因主要是甲醛迁移量超标以及程序文件相关问题，而被通报的主要产品类别为木制切菜板；其它制品包括多用途篮和可生物降解叉子。多用途篮由于缺少相关材质信息，被归为其他制品类，且因全面迁移量超标，被判定为不适合作为食品接触材料；可生物降解叉子同样因为全面迁移量超标而被通报。

3. 通报国家分析

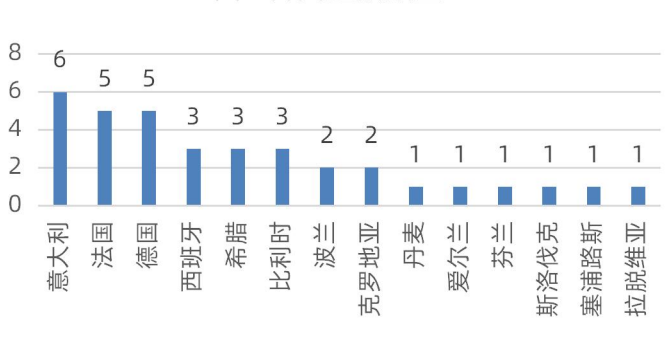
本期通报案例共计35例，其中，来自中国的产品被通报案例共27例，占比为77.14%。发布通报的国家方面，本季度共有14个国家。其中，最多的是意大利，发起通报6例，占通报总数的17.14%，其次是法国和德国，各发起通报5例，各占通报总数的14.29%。

图3 对华产品通报情况



	1月	2月	3月
通报数量	12	9	14
对华通报	9	7	11

图4 各国通报数量



中鼎检测技术有限公司
E-mail：enquiry@cttlab.com http://www.cttlab.com

广东（东莞、深圳、惠州、广州、中山）
TEL：+86(0)769-8898 9888-884

浙江（义乌、宁波）
TEL：0579-8998 6543

福建（泉州、厦门）
TEL：0595-6809 9099

香港
TEL：+852 9319 8131

越南 河内
TEL：+84 024 3928 8688
E-mail：vn@cttlab.com

奥地利 林茨
TEL：+43 670 1928192
E-mail: eu@cttlab.com

加拿大 温哥华
TEL：+1 778 288 5623
E-mail:north.america@cttlab.com

食品接触材料召回通报预警–2025年第1期

附录：通报化学项目中需注意相关限值要求：

项目名称	法规/标准/指令	限值	材料/产品
全面迁移量	(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		详见法规要求	
未授权物质	(EU)No 10/2011及其修订案	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	
双酚A	(EU) 2024/3190	禁用	食品接触材料及制品
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	
24种金属特定释放量	EDQM Technical Guide Resolution CM/Res(2020)9	详见指南要求	金属及合金制品
挥发性化合物	BfR Recommendation XV	0.5%	硅橡胶制品
MOAH	Arrêté du 13 avril 2022	含有1到7个芳香环的矿物油芳烃（MOAH）： 1000 ppm（在油墨中） 含有3到7个芳香环的矿物油芳烃（MOAH）： 1 ppm（在油墨中）	包装和印刷品
MOSH		含有16到35个碳原子的矿物油饱和烃（MOSH）：1000 ppm（在油墨中）	

·参考网站：

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

中鼎检测技术有限公司

E-mail：enquiry@cttlab.com http://www.cttlab.com

广东（东莞、深圳、惠州、广州、中山）
TEL：+86(0)769-8898 9888-884

浙江（义乌、宁波）
TEL：0579-8998 6543

福建（泉州、厦门）
TEL：0595-6809 9099

香港
TEL：+852 9319 8131

越南 河内
TEL：+84 024 3928 8688
E-mail：vn@cttlab.com

奥地利 林茨
TEL：+43 670 1928192
E-mail: eu@cttlab.com

加拿大 温哥华
TEL：+1 778 288 5623
E-mail:north.america@cttlab.com