



## Food Contact Material Recall Notifications-2024Report04

Food safety is closely related to the safety of food contact materials. With the continuous progress of science and technology, the types of food contact materials are becoming more and more abundant, which brings convenience and many new safety challenges. At present, the European Union has formulated a strict legal system for food contact materials, and built a perfect early warning and notification mechanism. Once illegal products are found, the EU will quickly take effective measures to deal with them.

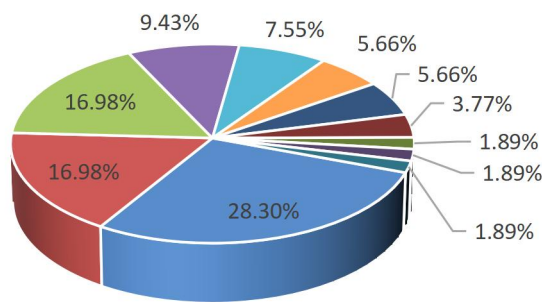
In this issue, the notification information of food contact materials from the EU Rapid Warning System for Food and Feed (RASFF) in the fourth quarter of 2024 was summarized, with a total of 49 cases, of which 27 cases were directed at China products (including 2 cases from Hongkong, China and 2 cases from Taiwan Province, China).

The analysis is as follows:

### 1. Analysis of the reason for the notification

The reasons for the periodic notification mainly fall into three categories: excessive migration of harmful chemicals, sensory quality defects and lack of program documents. In this quarter, the notification caused by the migration of harmful chemicals exceeded the standard accounted for the vast majority. Specifically, the number of notifications of excessive migration of primary aromatic amines was the highest, with a total of 15 times, accounting for 28.30%; Followed by the excessive migration of metal elements, a total of 9 times, accounting for 16.98%. In addition, it is worth paying attention to that the number of notifications due to procedural documents is 9, accounting for 16.98%. See Figure 1 for details.

Figure1 Distribution chart of notification reasons



- The migration of primary aromatic amines exceeds the standard
- The migration of metal elements exceeds the standard
- Issues related to declaration of conformity and test documents
- Sensory quality defect
- The migration of phthalate esters exceeds the standard
- The migration of melamine exceeded the standard
- The migration of formaldehyde exceeded the standard
- The use of unauthorized substances
- Color migration
- Volatile organic compounds exceed the standard
- The migration of photoinitiator exceeds the standard

#### ◆ Reason for notification "ranking list"

##### ■No.1: The migration of primary aromatic amines exceeded the standard (28.30%)

**Analysis :** In this bulletin, 15 cases were reported because the migration of primary aromatic amines exceeded the standard, accounting for 28.30%, among which the problem of plastic products was particularly prominent. Primary aromatic amines are a kind of organic compounds containing aromatic rings and amino groups, which are toxic and may cause cancer. In order to ensure food safety and human health, the EU plastic regulation EU 10/2011 strictly limits the migration of primary aromatic amines in plastic products.

##### ■No.2: Excessive migration of metal elements & problems related to program files (each accounting for 16.98%)

**Analysis :** In this bulletin, 9 cases were reported due to excessive migration of metal elements, accounting for 16.98%, among which the problem of metal products was particularly prominent. Excessive migration of metal elements in food contact products may pose a serious risk to human health. In addition, there were also 9 cases reported due to procedural documents in this quarter, accounting for 16.98%. The main problems include the lack of conformity declaration or test report documents. In this regard, export enterprises need to attach great importance to the compliance of procedural documents and ensure that relevant documents are complete and effective, so as to effectively avoid the recurrence of similar problems.

##### ■No.3: Sensory quality defect (9.43%)

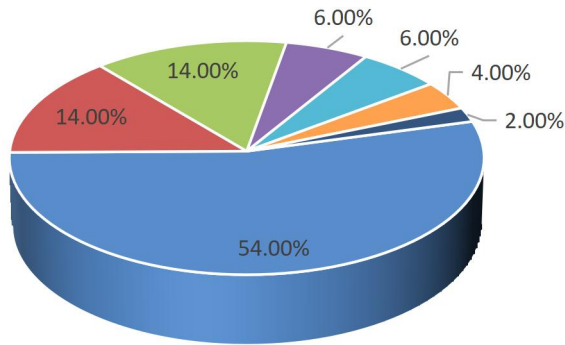
**Analysis :** In this bulletin, 5 cases were reported due to sensory quality defects of products, accounting for 9.43% of the total number of notifications. These defects are mainly manifested in the following situations: first, the sensory quality of food contact products deteriorates; Second, physical changes occur during the test; Third, there are foreign bodies in the product. If there are sensory quality defects in food contact products, it will not only damage the sensory quality of contact food such as color, aroma and taste, but also cause food safety hazards, thus endangering human health.



## Food Contact Material Recall Notifications-2024Report04

### 2. Analysis of the Products for the notification

Figure 2 Distribution of notified product types



- Plastic products
- Metal products
- Other products
- Ceramic products
- Paper products
- Bamboo and wood products
- Silicone rubber products

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

##### ■ No.1: Plastic products (54.00%)

**Analysis:** In this bulletin, plastic products were notified 27 times, accounting for 54.00%, of which 15 times involved products of China origin. The main reasons for the notification of plastic products include the excessive migration of primary aromatic amines, followed by the excessive migration of melamine, irregular program documents and the use of unauthorized substances. Plastic products for food contact exported to the European Union must comply with (EC) No 1935/2004 and (EU) No 10/2011 and other relevant laws and regulations. The types of high-risk plastic products that are often notified include nylon plastic products, melamine plastic products and plastic products containing unauthorized substances.

##### ■ No.2: Metal products & other products (each accounting for 14.00%)

**Analysis:** In this bulletin, metal products were notified 7 times, four of which involved China as the country of origin. The main reason reported is that the migration of metal elements exceeds the standard, which is usually caused by the use of non-compliant raw materials or improper control of production process. In addition, other products have also been notified 7 times. The so-called "other products" refer to products whose specific material types are not specified in the RASFF notification.

##### ■ No.3: Ceramic products & paper products (each accounting for 6.00%)

**Analysis:** In this bulletin, ceramic products were notified 3 times, two of which involved China as the country of origin. The main reason why ceramic products are notified is that the migration of metal elements exceeds the standard. At the same time, paper products were also notified 3 times, and the reasons for the notification included excessive migration of lead, phthalates and photoinitiators, among which pizza box was the most frequently notified product type.

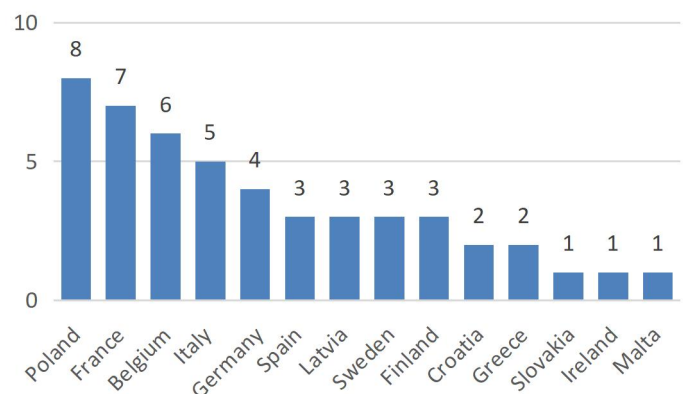
### 3. Analysis of the Countries for the notification

A total of 49 cases were notified, including 27 cases of products from China, accounting for 55.10%. In terms of countries that issued notifications, there were 14 countries in this quarter. Among them, Poland initiated notifications with 8 cases, accounting for 16.33% of the total notifications, followed by France with 7 cases, accounting for 14.29% of the total notifications.

Figure 3 Notification of Chinese products



Figure 4 Number of notifications by countries





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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 <sup>2</sup> 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.	
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	
Lead	84/500/EEC 2005/31/EC	See the regulatory requirements for details	Ceramic and glass products
Cadmium			
Arsenic	Fiche MCDA N°2 (V01-01/05/2016)	Not be detected	Ceramic, glass and enamel products
Aluminium		1mg/kg	
Cobalt		0.02mg/kg	
Nickel	Decree of 21 March 1973 and Ministry of health	0.1mg/kg	Stainless steel products
Chromium (trivalent)		0.1mg/kg	
Manganese		0.1mg/kg	
Volatile substance content	BfR Recommendation XV	0.5%	Silicone rubber products
1-Hydroxycyclohexyl phenyl ketone	Fiche MCDA n°4 (V02 - 01/01/2019) 947-19-3	Not be detected (DL =0.01mg/kg)	Paper and paperboard products
Lead		0.01mg/kg	

Referenced Websites:

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

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## 食品接触材料召回通报预警-2024年第4期

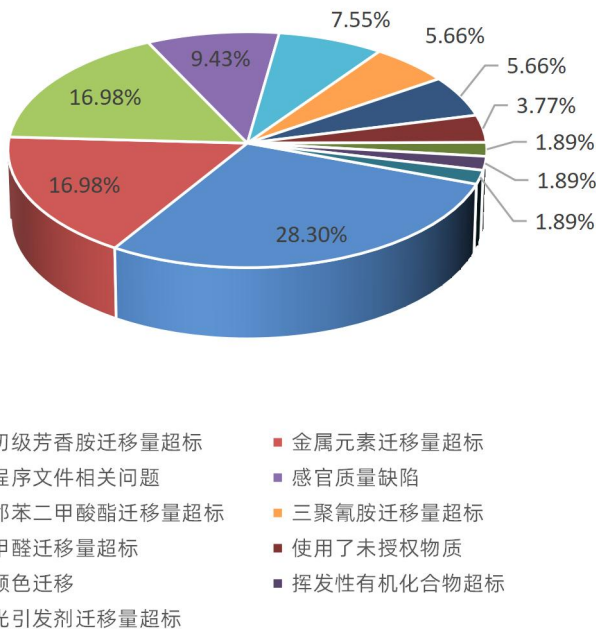
食品安全与食品接触材料的安全性息息相关。随着科技的不断进步，食品接触材料的种类日益丰富，这在带来便利的同时，也衍生出诸多新的安全挑战。目前，欧盟已针对食品接触材料制定了严格的法规体系，并构建了完善的预警与通报机制。一旦发现违规产品，欧盟便会迅速采取有力措施加以处理。

本期汇总了2024年第4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49例，其中27例针对中国产品（包括2例来自中国香港的产品、2例来自中国台湾的产品），分析如下：

### 1. 通报原因分析

本期通报的原因主要归结为三大类：有害化学物质迁移超标、感官质量缺陷和程序文件缺失。在本季度中，有害化学物质迁移超标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15次，占比28.30%；紧随其后的是金属元素迁移量超标，共9次，占比16.98%。此外，本季度值得重点关注的是因程序文件而被通报的数量为9次，占比16.98%。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 (28.30%)

**风险分析：**本期通报中，共有15起因初级芳香胺迁移量超标而被通报，占比28.30%，其中塑料制品问题尤为突出。初级芳香胺是一类含芳环和氨基的有机化合物，具有毒性且可能致癌。为保障食品安全和人体健康，欧盟塑料法规 EU 10/2011 对塑料制品中初级芳香胺的迁移量作出了严格限制。

#### ■ No.2: 金属元素迁移量超标&程序文件相关问题 (各占比16.98%)

**风险分析：**本期通报中，因金属元素迁移量超标被通报的案例共9起，占比16.98%，其中金属制品问题尤为突出。食品接触制品中金属元素迁移量超标可能对人体健康构成严重风险。此外，本季度因程序文件问题被通报的案例同样为9起，占比16.98%。主要问题包括缺少符合性声明或检测报告文件。对此，出口企业需高度重视程序文件的合规性，确保相关文件齐全有效，以有效避免类似问题的再次发生。

#### ■ No.3: 感官质量缺陷 (9.43%)

**风险分析：**本期通报中，因产品感官质量缺陷被通报的案例共有5起，占总通报数量的9.43%。这些缺陷主要表现为以下几种情况：一是食品接触制品的感官品质恶化；二是在测试过程中发生物理变化；三是产品中存在异物。食品接触制品若存在感官质量缺陷，不仅会对接触食品的色、香、味等感官品质造成损害，还可能引发食品安全隐患，从而危及人体健康。

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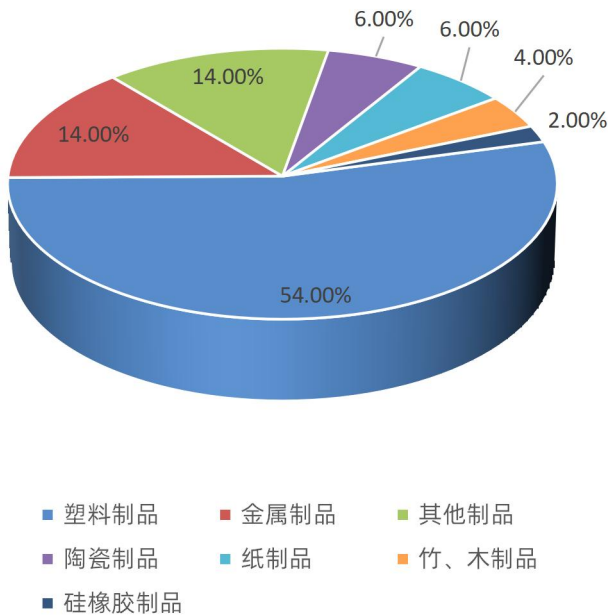
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### 2. 通报产品分析

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 (54.00%)

**风险分析:** 本期通报中, 塑料制品共被通报27次, 占比54.00%, 其中15次涉及原产国为中国的产品。塑料制品被通报的主要原因包括初级芳香胺迁移量超标, 其次为三聚氰胺迁移量超标、程序文件不合规以及使用未授权物质等问题。出口欧盟的食品接触用塑料制品需符合 (EC) No 1935/2004 和 (EU) No 10/2011 等相关法规。常被通报的高风险塑料制品类型包括尼龙塑料制品、三聚氰胺塑料制品以及含有未授权物质的塑料制品。

##### ■ No.2: 金属制品及其他制品 (各占比14.00%)

**风险分析:** 本期通报中, 金属制品被通报7次, 其中4次涉及原产国为中国。被通报的主要原因是金属元素迁移量超标, 通常由使用不合规原材料或生产工艺控制不当引起。此外, 其他制品也被通报7次, 所谓“其他制品”是指RASFF通报中未明确具体材料类型的产品。

##### ■ No.3: 陶瓷制品&纸制品 (各占比6.00%)

**风险分析:** 本期通报中, 陶瓷制品被通报3次, 其中2次涉及原产国为中国。陶瓷制品被通报的主要原因是金属元素迁移量超标。同时, 纸制品也被通报3次, 通报原因包括铅、邻苯二甲酸盐和光引发剂迁移量超标, 其中披萨盒是最常被通报的产品类型。

### 3. 通报国家分析

本期通报案例共计49例, 其中, 来自中国的产品被通报案例共27例, 占比为55.10%。发布通报的国家方面, 本季度共有14个国家。其中, 最多的是波兰, 发起通报8例, 占通报总数的16.33%, 其次是法国, 发起通报7例, 占通报总数的14.29%。

图3 对华产品通报情况

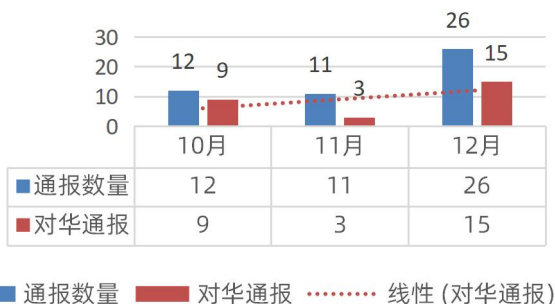
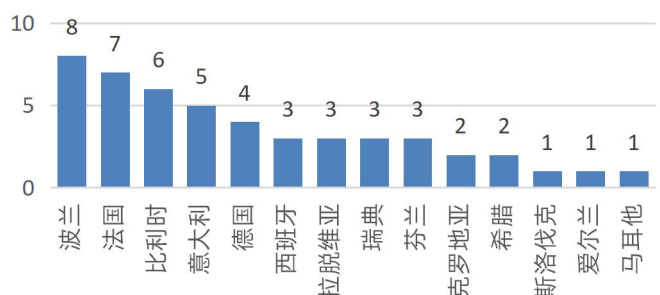


图4 各国通报数量



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## 食品接触材料召回通报预警-2024年第4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 <sup>2</sup> 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.	
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	
铅	84/500/EEC	详见法规要求	陶瓷、玻璃制品
镉	2005/31/EC		
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	
镍	Decree of 21 March 1973 and Ministry of health	0.1mg/kg	不锈钢制品
三价铬		0.1mg/kg	
锰		0.1mg/kg	
挥发性化合物	BfR Recommendation XV	0.5%	硅橡胶制品
1-羟基环己基(苯基)酮	Fiche MCDA n°4 (V02-01/01/2019) 947-19-3	不得检出 (检出限=0.01mg/kg)	纸和纸板制品
铅		0.01mg/kg	

·参考网站:

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

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