



Food Contact Material Recall Notifications-2026Report01

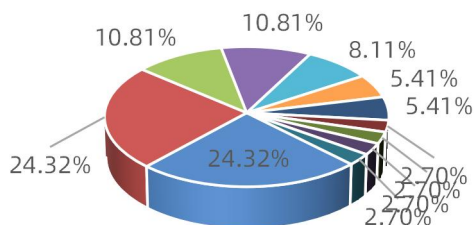
The safety of food contact materials is directly related to food safety. With the continuous development of material technologies and manufacturing processes, the types of food contact materials have become increasingly diverse, and the associated potential safety risks have also become more varied. The European Union has established a relatively comprehensive regulatory framework for food contact materials and uses the Rapid Alert System for Food and Feed (RASFF) to notify and issue alerts on products presenting safety risks.

This issue summarizes the RASFF notifications concerning food contact materials in the first quarter of 2026. A total of 34 notifications were recorded, of which 16 involved products from China, including one involving a product from Taiwan, China. The analysis is as follows:

1. Analysis of the reason for the notification

The reasons for notification in this issue were mainly concentrated in three categories: risks associated with hazardous chemical substances, sensory quality defects, and issues relating to procedural and compliance documentation. Among these, hazardous chemical substance risks remained the primary factor leading to food contact material notifications in this quarter. In terms of specific risk types, exceedances in the migration of primary aromatic amines and metal elements were the most prominent, with 9 cases each, accounting for 24.32% respectively. Sensory quality defects and exceedances in formaldehyde migration followed, with 4 cases each, accounting for 10.81% respectively. See Figure 1 for details.

Figure 1 Distribution chart of notification reasons



- Primary aromatic amines migration exceeded the limit
- Migration of metallic elements exceeded the limit
- Sensory quality defects
- Formaldehyde migration exceeded the limit
- Issues related to procedural documents
- Overall migration exceeded the limit
- Melamine migration exceeded the limit
- Phthalate migration exceeded the limit
- Bisphenol S migration
- Volatile organic compounds exceeded the limit
- Food packaging contains MOH

◆ “Ranking” of Notification Reasons

■ **No. 1: Exceedance of primary aromatic amine migration and metal element migration (Each accounting for 24.32%)**

Analysis : In this quarter’s notifications, exceedances of primary aromatic amine migration and metal element migration were jointly the leading causes of notification, with 9 cases each, accounting for 24.32% respectively. Exceedances of primary aromatic amine migration were mainly associated with nylon kitchenware and tableware, and the risk sources are generally linked to specific raw materials, additives, dyes, or pigments used in the production of polyamide materials. Exceedances of metal element migration mainly involved metal products. Under certain conditions, these risk substances may migrate into food and pose potential adverse effects on human health. Therefore, they are both key indicators of concern under the EU regulatory framework for food contact materials.

■ **No. 2: Sensory quality defects and exceedance of formaldehyde migration (Each accounting for 10.81%)**

Analysis : In this quarter’s notifications, sensory quality defects and exceedances of formaldehyde migration were jointly the second major category of notification reasons, with 4 cases each, accounting for 10.81% respectively. Sensory quality defects mainly included odour, detachment of foreign matter, or other issues affecting the sensory quality of food, reflecting deficiencies in raw materials, manufacturing processes, or quality control. Exceedances of formaldehyde migration mainly involved plastic products such as melamine tableware. Under certain conditions, relevant substances may migrate into food and pose potential risks to consumer health.

■ **No. 3: Issues relating to procedural and compliance documentation (Accounting for 8.11%)**

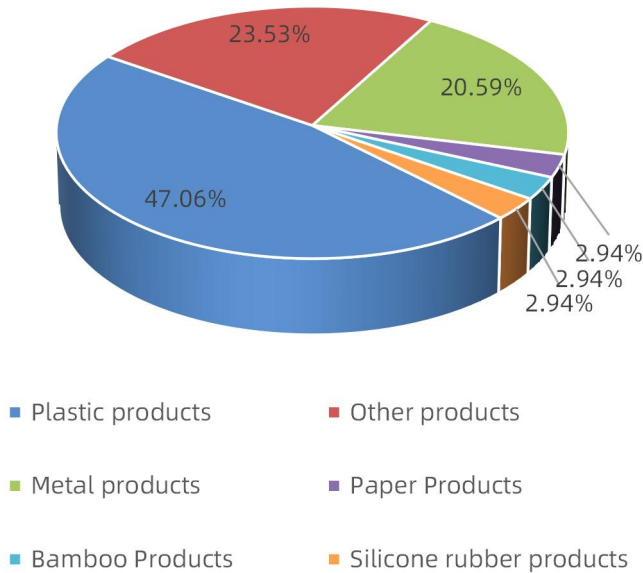
Analysis : In this quarter’s notifications, issues relating to procedural and compliance documentation appeared 3 times, accounting for 8.11%. These mainly included false product declarations, laboratory reports not accepted at the border, and border rejection due to incomplete documentation. Although such issues may not necessarily correspond directly to product safety defects, they can affect the regulatory authorities’ assessment of product compliance and may lead to border detention, rejection, or further inspection. Relevant enterprises should ensure that declarations of compliance, test reports, and technical documentation are authentic, complete, traceable, and consistent with the actual product conditions and applicable regulatory requirements.



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2. Analysis of the Products for the notification

Figure 2 Distribution of notified product types



◆ “Ranking” of Notified Product Types

■ No. 1: Plastic products (Accounting for 47.06%)

Analysis : In this quarter’s notifications, plastic products were reported 16 times, accounting for 47.06%, making them the most frequently notified product type. The notified products were mainly nylon kitchenware and tableware, as well as melamine tableware. The non-compliances were concentrated in exceedances of primary aromatic amine migration, formaldehyde migration, and melamine migration, indicating that close attention should still be paid to raw material selection, material formulation, and manufacturing process control for such products.

■ No. 2: Other products (Accounting for 23.53%)

Analysis : In this quarter’s notifications, other products were reported 8 times, accounting for 23.53%, ranking second among the notified product types. This category mainly includes food contact products for which the material attributes or product classification were not clearly specified in the original notification information. The reasons for non-compliance were relatively diverse, involving exceedances of metal element migration, sensory quality defects, and exceedances of primary aromatic amine migration.

■ No. 3: Metal products (Accounting for 20.59%)

Analysis : In this quarter’s notifications, metal products were reported 7 times, accounting for 20.59%, ranking third among the notified product types. The main reasons for notification included exceedances of metal element migration and sensory quality defects. The products involved included baking trays, meat slicers, and aluminium water bottles. These issues indicate that close attention should still be paid to material selection and surface treatment control for certain metal food contact products.

3. Analysis of the Countries for the notification

A total of 34 notification cases were recorded in this quarter, of which 16 involved products related to China, accounting for 47.06%. In terms of monthly distribution, March recorded the highest number of notifications, with 15 cases in total, including 8 notifications concerning products from China. Regarding the notifying countries, a total of 15 countries issued notifications in this quarter. Italy reported the highest number of cases, with 6 notifications, accounting for 17.65% of the total, followed by Ireland with 5 notifications, accounting for 14.71%.

Figure 3 Notification of Chinese products

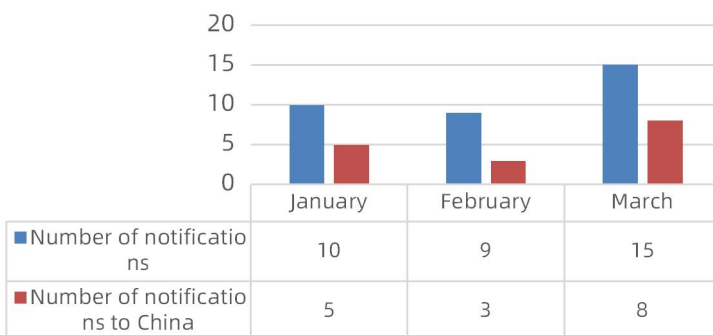
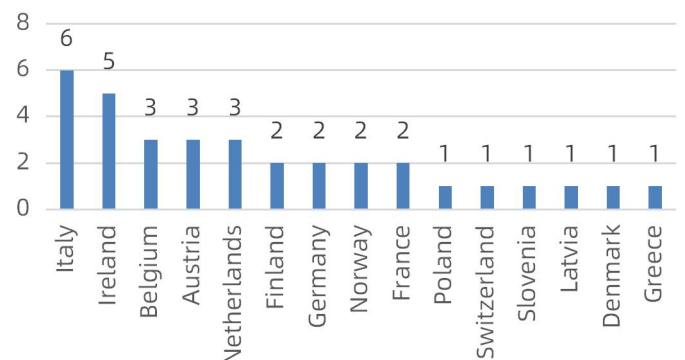


Figure 4 Number of notifications by countries





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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 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	
Specific migration of formaldehyde	(EU)No 10/2011 and its amendments	15mg/kg	Melamine plastic products
Specific migration of melamine	(EU)No 284/2011	2.5mg/kg	
Bisphenol S	(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>

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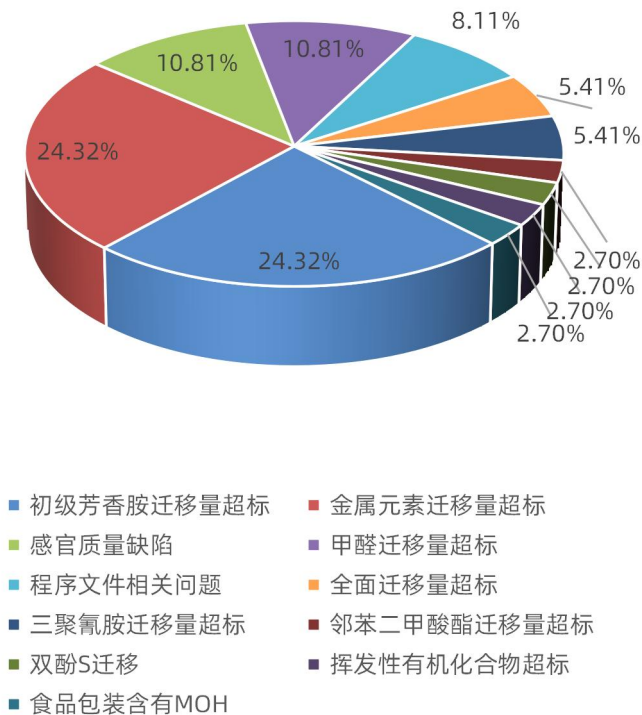
食品接触材料的安全性直接关系到食品安全。随着材料技术和生产工艺不断发展，食品接触材料的种类日益丰富，潜在安全风险也更加多样。欧盟（EU）针对食品接触材料建立了较为完善的法规监管体系，并依托食品和饲料类快速预警系统（RASFF）对存在安全风险的产品进行通报和预警。

本期汇总了2026年第1季度RASFF食品接触材料通报信息，共计34例，其中16例针对中国产品，包括1例中国台湾产品，分析如下：

1. 通报原因分析

本期通报原因主要集中在三大类别：有害化学物质风险、感官质量缺陷以及程序与合规文件问题。其中，有害化学物质风险仍是引发本季度食品接触材料通报的主要因素。从具体风险类型来看，初级芳香胺迁移量超标和金属元素迁移量超标问题最为突出，均涉及9次，各占24.32%；感官质量缺陷和甲醛迁移量超标次之，均涉及4次，各占10.81%。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 & 金属元素迁移量超标 (各占比24.32%)

风险分析：本期通报中，初级芳香胺迁移量超标和金属元素迁移量超标并列为最主要的通报原因，通报频次均为9次，各占24.32%。其中，初级芳香胺迁移量超标主要集中于尼龙餐厨具，风险来源通常与聚酰胺材料生产中使用的特定原料、助剂、染料或颜料有关；金属元素迁移量超标则主要涉及金属制品。上述风险物质在特定条件下可能迁移至食品中，并对人体健康造成潜在不利影响，因此均属于欧盟食品接触材料监管中的重点关注指标。

■ No. 2: 感官质量缺陷 & 甲醛迁移量超标 (各占比10.81%)

风险分析：本期通报中，感官质量缺陷和甲醛迁移量超标并列为第二类主要通报原因，通报频次均为4次，各占10.81%。其中，感官质量缺陷主要表现为异味、异物脱落或影响食品感官品质等问题，反映出产品在原材料、生产工艺或质量控制方面存在不足；甲醛迁移量超标则主要涉及密胺等塑料制品，相关物质在特定条件下可能迁移至食品中，对消费者健康造成潜在风险。

■ No. 3: 程序文件相关问题 (占比8.11%)

风险分析：本期通报中，程序文件相关问题共出现3次，占比8.11%，主要包括虚假产品声明、实验室报告未获边境认可，以及因文件不完整被边境拒收等情况。此类问题虽不一定直接对应产品安全缺陷，但会影响监管机构对产品合规性的判断，可能导致边境扣留、拒收或进一步核查。相关企业应确保符合性声明、检测报告及技术文件真实、完整、可追溯，并与产品实际情况及适用法规要求保持一致。

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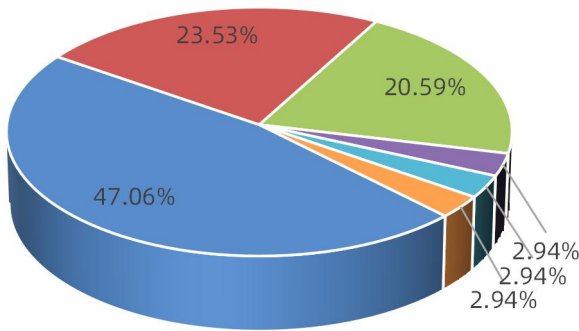
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2. 通报产品分类

图2 通报产品类型分布图



- 塑料制品
- 其他制品
- 金属制品
- 纸制品
- 竹制品
- 硅橡胶制品

◆ 通报产品类型“排行榜”

■ No. 1: 塑料制品 (占比47.06%)

风险分析: 本期通报中, 塑料制品共被通报16次, 占比47.06%, 为通报频次最高的产品类型。被通报产品主要为尼龙餐厨具和密胺餐具, 不合格项目集中在初级芳香胺、甲醛及三聚氰胺迁移量超标, 反映出相关产品在原料选择、材料配方及生产工艺控制方面仍需重点关注。

■ No. 2: 其他制品 (占比23.53%)

风险分析: 本期通报中, 其他制品共被通报8次, 占比23.53%, 位列通报产品类型第二。该类别主要包括原始通报信息中材质属性或产品分类不够明确的食物接触制品, 不合格原因相对分散, 涉及金属元素迁移量超标、感官质量缺陷及初级芳香胺迁移量超标等。

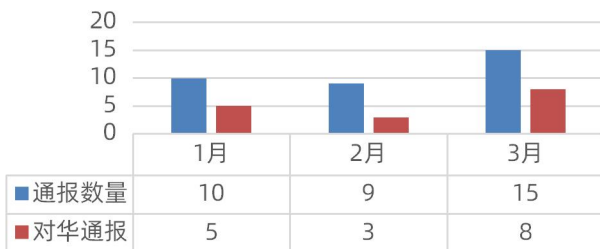
■ No. 3: 金属制品 (占比20.59%)

风险分析: 本期通报中, 金属制品共被通报7次, 占比20.59%, 位列通报产品类型第三。主要通报原因包括金属元素迁移量超标及感官质量缺陷, 涉及产品包括烤盘、肉片机、铝制水瓶等。相关问题反映出部分金属食物接触制品在材料选用、表面处理控制方面仍需重点关注。

3. 通报国家分析

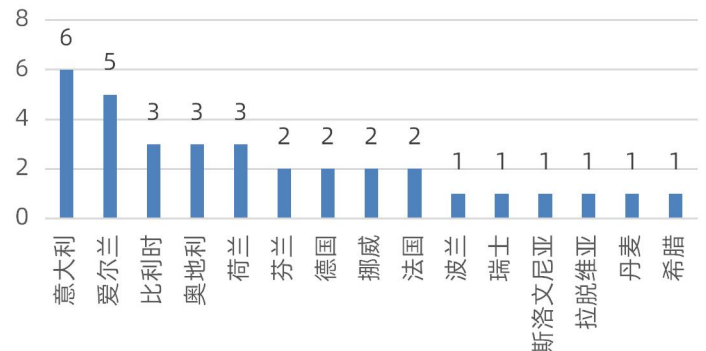
本期通报案例共计34例, 其中涉及中国相关产品16例, 占比47.06%。从月度分布来看, 3月通报数量最高, 共15例, 其中对华通报8例。发布通报的国家方面, 本季度共有15个国家参与通报。其中, 意大利通报数量最多, 共6例, 占通报总数的17.65%; 爱尔兰次之, 共5例, 占比14.71%。

图3 对华产品通报情况



■ 通报数量 ■ 对华通报

图4 各国通报数量



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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	
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S	(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>

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