



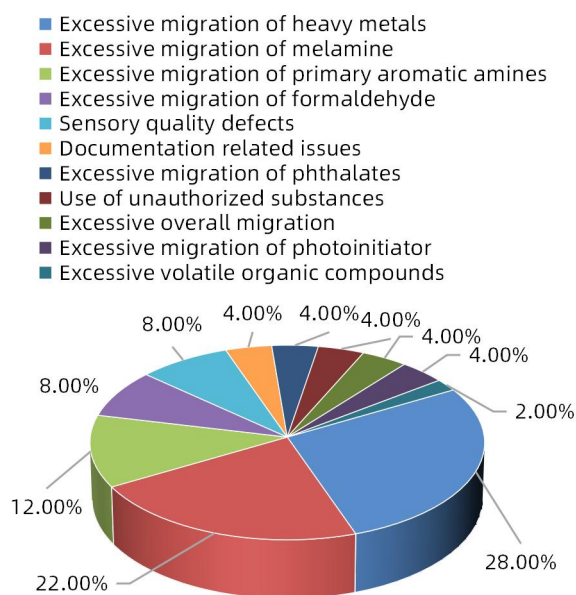
Food Contact Material Recall Notifications-2025Report03

The safety of food contact materials is a fundamental requirement for ensuring food safety. With continuous advancements in material technologies, the variety of food contact materials has expanded, and the associated potential risks have become increasingly diverse. To address these challenges, the European Union has established a comprehensive regulatory framework that imposes strict controls on various types of food contact materials, along with an efficient alert and notification system designed to promptly identify and manage safety hazards. For products that fail to comply with relevant requirements, the EU may take corrective actions such as recalls, public notifications, and market restrictions to protect consumer health and maintain market order. This report summarizes notifications related to food contact materials recorded by the EU Rapid Alert System for Food and Feed (RASFF) in the third quarter of 2025, with a total of 47 cases. Among them, 29 cases involved products originating from China, including 2 cases from Hong Kong, China. Detailed analysis is provided as follows:

1. Analysis of the reason for the notification

The causes of notifications in this reporting period were mainly categorized into four areas: hazardous chemical risks, the use of unauthorized substances, sensory quality defects, and issues related to procedural and compliance documentation. Among these, hazardous chemical risks accounted for the largest proportion and were the primary driver of the notifications. Specifically, excessive migration of metal elements was the most prominent issue, with 14 cases, representing 28.00% of all notifications; this was followed by excessive migration of melamine and primary aromatic amines (see Figure 1 for details).

Figure1 Distribution chart of notification reasons



Reason for notification "ranking list"

■ No. 1: Excessive migration of metal elements (28.00%)

Analysis: In this reporting period, excessive migration of metal elements remained a prominent issue, with 14 cases notified. Once migrated from food contact materials into food and subsequently ingested, metal elements tend to accumulate in the body due to their slow metabolic elimination. Long-term exposure may pose chronic health risks, such as neurotoxicity, impaired immune function, and increased susceptibility to diseases. Therefore, the European Union has established stringent limits on the migration of metal elements in food contact materials through relevant regulations and technical standards, in order to minimize potential risks and safeguard consumer health and safety.

■ No. 2: Excessive migration of melamine (22.00%)

Analysis: In this reporting period, excessive migration of melamine was also a notable concern, with 11 notified cases. Melamine is commonly used with formaldehyde to produce thermosetting melamine-formaldehyde resin, which is widely applied in the manufacture of melamine tableware due to its excellent heat resistance, impact strength, and hardness. However, inadequate quality control during production may lead to the migration of melamine from the resin into food. Chronic exposure to melamine can pose health risks, particularly to the kidneys, increasing the likelihood of kidney stones and related long-term conditions.

■ No. 3: Excessive migration of primary aromatic amines (12.00%)

Analysis: In this reporting period, there were 6 cases involving excessive migration of primary aromatic amines (PAAs). PAAs may originate from certain dyes, pigments, or intermediates used in the production of food contact materials, and they are particularly common in dark-colored products or those made of polyamide (nylon). PAAs are known to have potential carcinogenic and genotoxic effects, and long-term exposure may lead to serious health risks.

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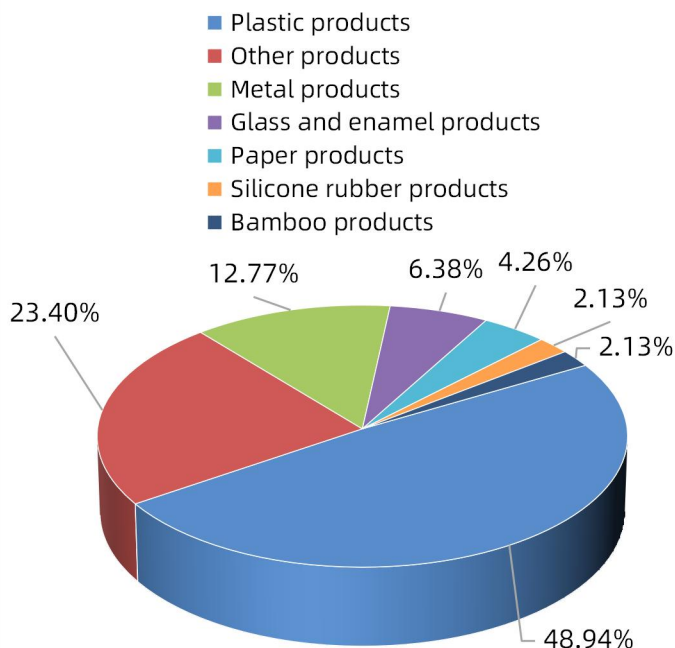
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2. Analysis of the Products for the notification

Figure 2 Distribution of notified product types



◆ Materials and products for notification"ranking list"

■ No. 1: Plastic products (48.94%)

Analysis : In this reporting period, there were 23 notified cases involving plastic food contact products, representing a relatively high proportion. The main non-compliance issues included excessive migration of primary aromatic amines as well as formaldehyde and melamine migration exceeding specific limits, along with the use of unauthorized substances. Among these, melamine tableware and nylon kitchenware were the most frequently notified product categories.

■ No. 2: Other products (23.40%)

Analysis : In this reporting period, there were 11 notified cases classified as "other products," referring to products for which material composition information was not clearly specified in the notification. The main non-compliance issues included excessive migration of metal elements, sensory quality defects, procedural and compliance documentation issues, and excessive migration of photoinitiators. Among these, kitchenware and tableware were the most frequently notified product categories.

■ No. 3: Metal products (12.77%)

Analysis : In this reporting period, there were 6 notified cases involving metal products. The primary non-compliance issues were excessive migration of metal elements and sensory quality defects. In particular, the sensory defects mainly involved corrosion observed on the surface of knives.

3. Analysis of the Countries for the notification

A total of 47 notifications were issued in this reporting period, of which 29 involved products originating from China, accounting for 61.70%. Compared with the previous two quarters, the proportion of Chinese products being notified declined significantly in the second quarter and then rebounded in the third quarter, though still remaining below the level seen in the first quarter. Regarding the notifying countries, a total of 17 EU Member States were involved this quarter; Poland and Germany reported the highest number of cases, with 9 each (19.15%), followed by Italy with 6 notifications (12.77%).

Figure 3 Notification of Chinese products

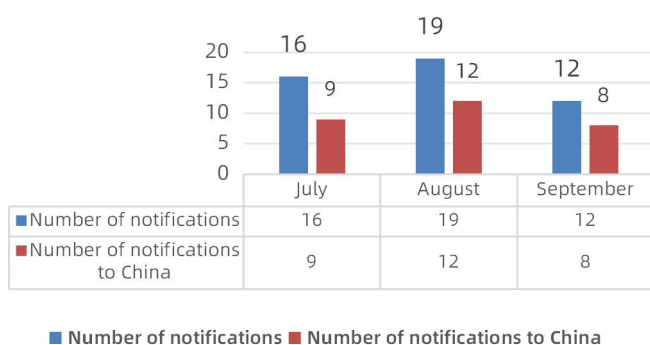
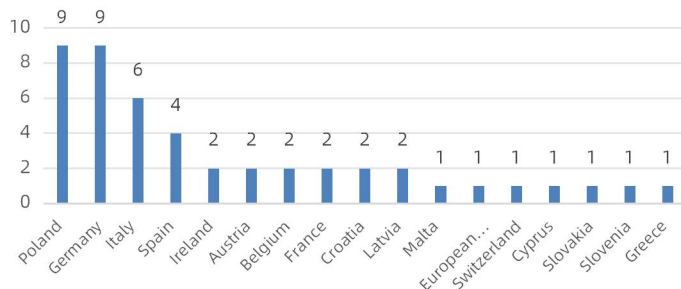


Figure 4 Number of notifications by countries



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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	
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
Leaching amount of lead, cadmium, aluminum, cobalt and arsenic	Fiche MCDA N°2 (V01-01/05/2016)	See the regulatory requirements for details	Ceramic, glass and enamel products
Lip test-lead and cadmium dissolution			
Leaching amount of lead and cadmium	DIN 51032	See the regulatory requirements for details	Ceramic and glass products
Lip test-lead and cadmium dissolution			
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

Referenced Websites:

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

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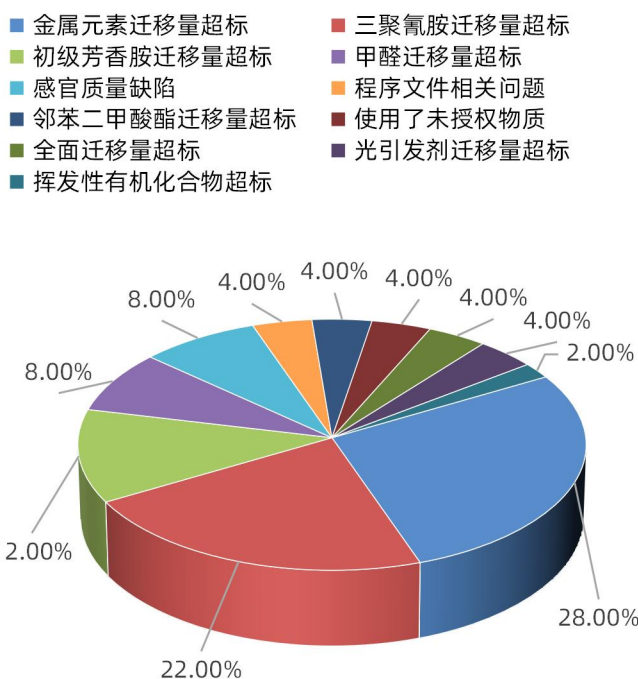
食品接触材料的安全性是保障食品安全的重要基础。随着材料技术的持续发展，食品接触材料的种类不断扩展，其潜在风险也日益多样化。为此，欧盟建立了完善的法规体系，对不同类型的食品接触材料实施严格监管，并配套构建了高效的预警与通报机制，以及时识别和处置安全隐患。对于不符合要求的产品，欧盟将采取召回、通报及市场限制等处罚措施，以确保消费者健康和市场秩序。

本期汇总了欧盟食品和饲料快速预警系统（RASFF）2025年第三季度关于食品接触材料的通报信息，共计47例。其中，29例产品来源于中国（含2例来自中国香港）。具体分析如下：

1. 通报原因分析

本期通报的原因主要集中在四大类别：有害化学物质风险、使用未授权物质、感官质量缺陷以及程序与合规文件问题。其中，有害化学物质风险占比最高，是引发通报的主要因素。从具体风险类型来看，金属元素迁移量超标问题最为突出，共14例，占全部通报的28.00%；其次是三聚氰胺迁移量超标和初级芳香胺迁移量超标等违规情形（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 (占比28.00%)

风险分析：本期通报中，金属元素迁移量超标问题仍然较为突出，共14例被通报。金属元素一旦从食品接触材料中迁移至食品并被人体摄入，具有蓄积性强、代谢缓慢等特性，长期暴露可能对人体健康造成慢性危害，如损伤神经系统、影响免疫功能及增加疾病风险。因此，欧盟通过相关法规和技术标准对食品接触材料中金属元素的迁移量设定了严格限值，以最大限度降低潜在风险，保护消费者健康与安全。

■ No. 2: 三聚氰胺迁移量超标 (占比22.00%)

风险分析：本期通报中，三聚氰胺迁移量超标问题同样较为突出，共11例被通报。三聚氰胺常与甲醛反应生成热固性三聚氰胺-甲醛树脂，这种树脂因其优异的耐热、耐冲击及硬度特性，广泛用于制造“耐皿”餐具。但若产品质量控制不当，该树脂中的三聚氰胺可能迁移至食品中。长期摄入三聚氰胺可能对肾脏造成损伤，并增加肾结石及相关慢性疾病的风险。

■ No. 3: 初级芳香胺迁移量超标 (占比12.00%)

风险分析：本期通报中，初级芳香胺（PAAs）迁移量超标问题共6例。初级芳香胺可能来源于食品接触材料生产中使用的某些染料、颜料或中间体，尤其是在深色制品或尼龙材料的产品中更为常见。PAAs具有潜在的致癌性和基因毒性，长期暴露可能引发严重健康风险。

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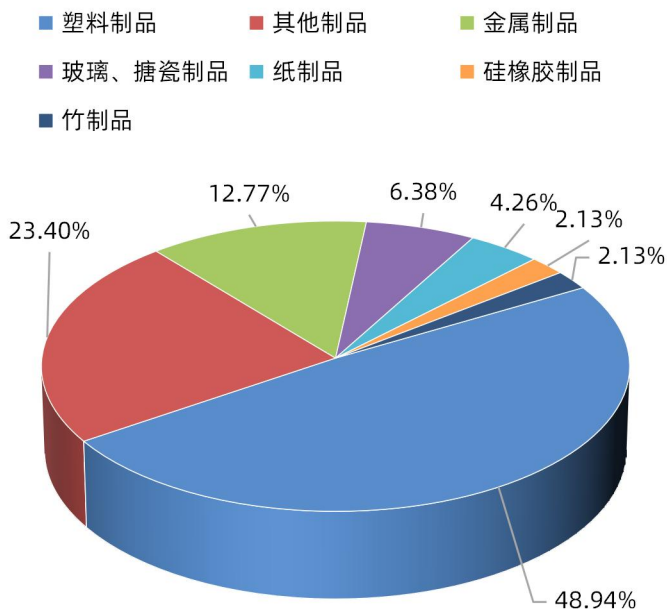
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2. 通报产品分类

图2 通报产品类型分布图



◆ 通报产品类型“排行榜”

■ No. 1: 塑料制品 (占比48.94%)

风险分析：本期通报中，塑料制品共23例，占比较高。其主要违规原因包括初级芳香胺迁移量超标、甲醛和三聚氰胺迁移量超标，以及使用未授权物质等。其中，密胺餐饮具和尼龙材质的厨房用具为通报较为集中的产品类别。

■ No. 2: 其他制品 (占比23.40%)

风险分析：本期通报中，“其他制品”共11例。该类别主要指通报信息中未明确材质属性的产品。其主要违规原因包括金属元素迁移量超标、感官质量缺陷、程序与合规文件问题以及光引发剂迁移量超标等。其中，厨房用具及餐饮具为通报较为集中的产品类别。

■ No. 3: 金属制品 (占比12.77%)

风险分析：本期通报中，金属制品共6例，主要违规原因涉及金属元素迁移量超标及感官质量缺陷。其中，感官质量缺陷主要表现为刀具外观出现腐蚀问题。

3. 通报国家分析

本期共通报47例，其中来自中国的产品29例，占61.70%。与前两季度相比，中国产品通报占比在第二季度明显下降后于第三季度有所回升，但仍低于第一季度水平。从发起通报国家来看，本季度共有17个成员国参与；其中，波兰与德国通报数量最高，均为9例，各占19.15%；意大利次之，通报6例，占12.77%。

图3 对华产品通报情况

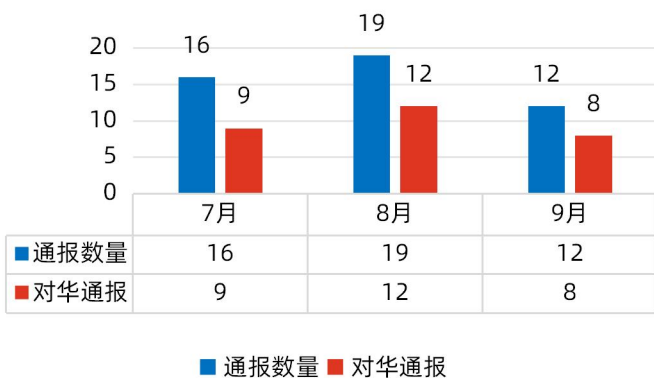
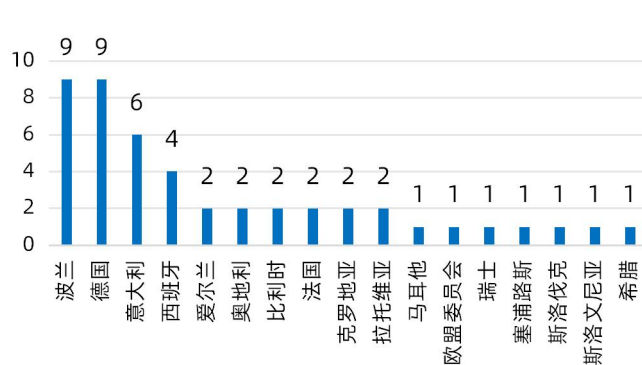


图4 各国通报数量



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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	
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
铅、镉、铝、钴、砷溶出量	Fiche MCDA N°2 (V01-01/05/2016)	详见法规要求	陶瓷、玻璃及搪瓷制品
唇边测试-铅、镉溶出量			
铅、镉溶出量	DIN 51032	详见法规要求	陶瓷、玻璃制品
唇边测试-铅、镉溶出量			
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

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