Food Contact Material Recall Notifications-2025Report04

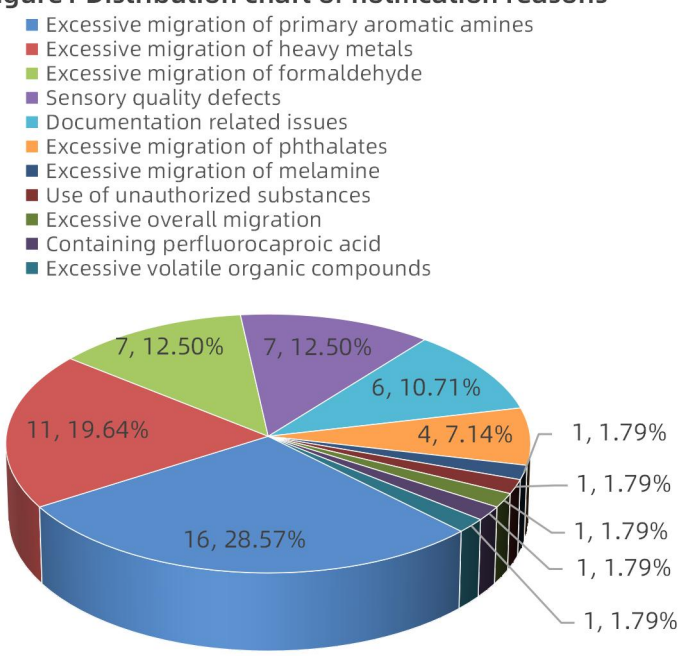
Ensuring the safety of food contact materials is the cornerstone of a robust food safety defense. With the rapid development of materials technology, the diversification of contact materials has led to increasingly complex potential risks. To address this, the European Union has established a rigorous regulatory system to precisely regulate various materials and relies on a sensitive early warning and notification mechanism to achieve rapid identification and efficient handling of potential hazards. For non-compliant products, the EU employs severe penalties through recalls, public disclosure, and market restrictions, aiming to comprehensively protect public health and effectively maintain a fair and orderly market environment.

This issue summarizes 55 notifications regarding food contact materials from the EU's Rapid Alert System for Food and Feed (RASFF) in the fourth quarter of 2025. Of these, 38 products originated from China. A detailed analysis follows:

1. Analysis of the reason for the notification

The reasons for this round of notifications mainly fall into four categories: risks of hazardous chemicals, use of unauthorized substances, sensory quality defects, and procedural and compliance issues. Among these, risks of hazardous chemicals accounted for the highest proportion and were the primary factors triggering the notifications. In terms of specific risk types, the most prominent issue was the excessive migration of primary aromatic amines, with 16 cases, accounting for 28.57% of all notifications; followed by excessive migration of metal elements, sensory quality defects, and excessive migration of formaldehyde, among other violations (see Figure 1).

Figure1 Distribution chart of notification reasons



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

⚑ **No. 1: Excessive migration of primary aromatic amines (28.57%)**

Analysis: In this report, there were 16 cases of excessive migration of primary aromatic amines (PAAs). PAAs typically originate from specific dyes, pigments, or synthetic intermediates used in the production of food contact materials, and are particularly prevalent in dark-colored products and nylon products. Due to the potential carcinogenicity and genotoxicity of PAAs, long-term human exposure may pose serious health threats, making them a risk indicator that must be strictly controlled in the safety monitoring of food contact materials.

⚑ **No. 2: Excessive migration of metal elements (19.64%)**

Analysis: This report reveals that the problem of excessive metal migration remains significant, with a total of 11 related cases. Once metals migrate from contact materials into food and are ingested by the human body, they typically exhibit strong accumulation and slow metabolism. Long-term exposure can lead to persistent chronic harm, such as damage to the nervous system, weakened immune function, and increased disease risk. Therefore, the European Union has established stringent limits on the migration of metals through a comprehensive regulatory system and technical standards, aiming to minimize potential safety hazards and effectively protect consumer health and safety.

⚑ **No. 3: Sensory quality defects & excessive formaldehyde migration (each accounting for 12.50%)**

Analysis: This report includes seven cases each related to excessive formaldehyde migration and sensory quality defects. For products with excessive formaldehyde migration, this harmful substance can easily migrate into the human body through contact during daily use. Long-term intake may significantly increase the risk of serious diseases such as leukemia, malignant tumors, and cancer, posing a substantial threat to life and health. Meanwhile, sensory quality defects manifest as cracks on the product surface, peeling of the varnish coating, material corrosion, or the presence of foreign particles or parts. These defects not only damage the physical integrity of the product but may also cause secondary pollution or potential safety hazards during use.

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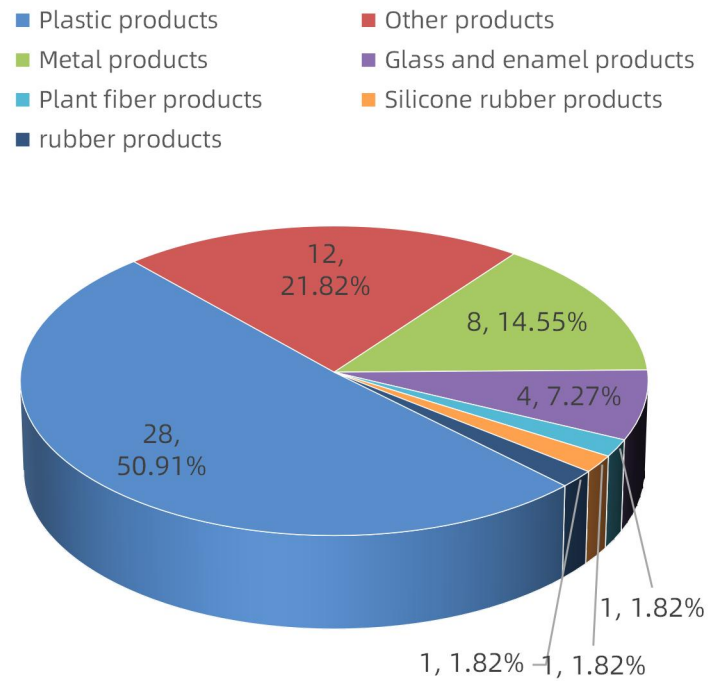
2. Analysis of the Products for the notification

Figure 2 Distribution of notified product types



◆ Materials and products for notification"ranking list"

No. 1: Plastic products (50.91%)

Analysis： This report includes 28 cases involving plastic products, representing a significant proportion of the total reported cases. The core reasons for these violations primarily focus on excessive migration levels of primary aromatic amines (PAAs), formaldehyde, and melamine. In terms of product categories, melamine tableware and nylon kitchenware are the areas with the highest concentration of risks reported, highlighting the significant challenges that remain in controlling the material stability and compliance of these materials.

No. 2: Other products (21.82%)

Analysis： In this report, the "Other Products" category involved a total of 12 cases. This category mainly covers products whose material properties were not clearly labeled in the original notification information. The reasons for the violations are diverse, mainly including excessive migration of metal elements, sensory quality defects, and missing procedural compliance documents. In terms of product form distribution, tableware products showed a high frequency of notifications.

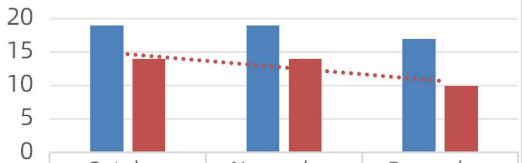
No. 3: Metal products (14.55%)

Analysis： This report involves a total of 8 cases related to metal products. The core reasons for the violations mainly focus on excessive migration of metal elements and sensory quality defects. In terms of sensory quality, the risk characteristics are particularly obvious, specifically covering physical defects such as surface corrosion of cutting tools and peeling of surface coatings on molds.

3. Analysis of the Countries for the notification

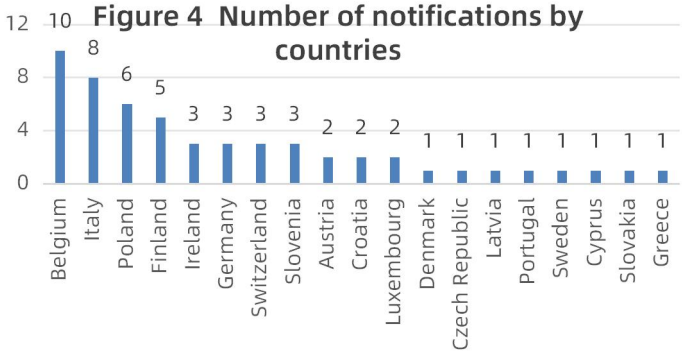
A total of 55 notifications were recorded this period, of which 38 were products originating from China, accounting for 69.09%. Compared to 55.10% in the same period last year, the notification rate showed a significant upward trend. Looking back at the year-on-year trend, the notification rate of Chinese products dropped sharply in the second quarter, then rebounded continuously in the third and fourth quarters, but remained below the historical high of 77.14% in the first quarter. In terms of the distribution of initiating countries, 19 member states participated in monitoring and feedback this quarter; Belgium had the highest number of notifications with 10, accounting for 18.18%, followed by Italy with 8, accounting for 14.55%.

Figure 3 Notification of Chinese products



	October	November	December
Number of notifications	19	19	17
Number of notifications to China	14	14	10

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	
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
Undecafluorohexanoic acid (PFHxA), its salts and PFHxA-related substances	(EU) 2024/2462	The sum of PFHxA and its salts < 25ppb, the sum of PFHxA related substances < 1000ppb	Paper and paperboard products

Referenced Websites:

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

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食品接触材料召回通报预警–2025年第4期

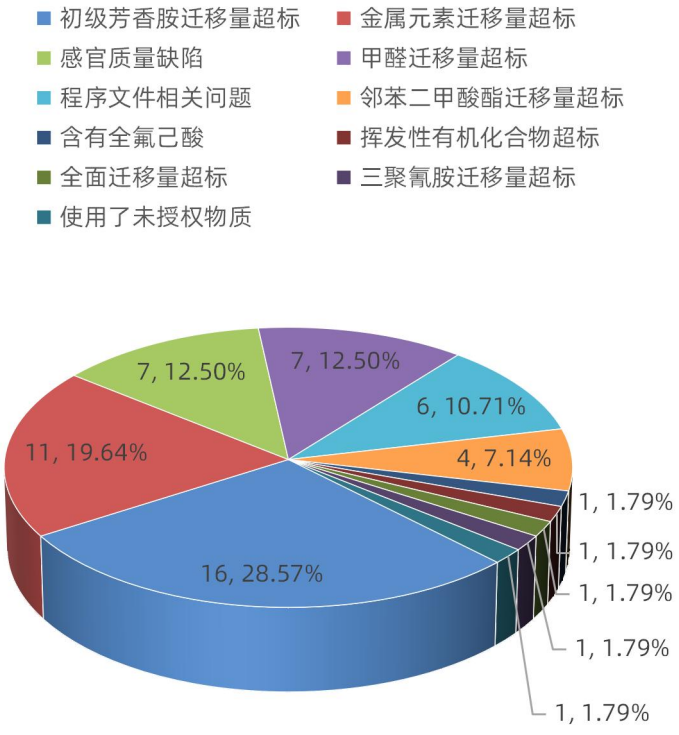
保障食品接触材料的安全是筑牢食品安全防线的基石。随着材料技术的飞速发展，接触材料的多元化令潜在风险日益复杂。为此，欧盟构筑了严密的法规体系，对各类材料实施精准监管，并依托灵敏的预警通报机制，实现隐患的快速识别与高效处置。针对违规产品，欧盟通过召回、公示及市场限制等手段严厉惩戒，旨在全方位保障公众健康，并有力维护公平有序的市场环境。

本期汇总了欧盟食品和饲料快速预警系统（RASFF）2025年第四季度关于食品接触材料的通报信息，共计55例。其中，38例产品来源于中国。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，初级芳香胺迁移量超标问题最为突出，共16例，占全部通报的28.57%；其次是金属元素迁移量超标、感官质量缺陷和甲醛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: 初级芳香胺迁移量超标（占比28.57%）

风险分析：在本期通报的数据中，初级芳香胺（PAAs）迁移量超标的案例共有16起。PAAs通常来源于食品接触材料生产中所使用的特定染料、颜料或合成中间体，尤其在深色制品及尼龙材质的产品中更为普遍。由于PAAs具有潜在的致癌性与基因毒性，人体若长期接触，可能面临严重的健康威胁，是食品接触材料安全监测中必须严加管控的风险指标。

⚑ No. 2: 金属元素迁移量超标（占比19.64%）

风险分析：本期通报显示，金属元素迁移量超标问题依然显著，相关案例共计11起。金属元素一旦经由接触材料迁移至食品并被人体摄入，通常具有蓄积性强、代谢缓慢等特点，长期暴露可能引发持续性的慢性危害，如损伤神经系统、削弱免疫功能并增加疾病风险。为此，欧盟通过严密的法规体系与技术标准，对金属元素的迁移量设定了严苛的限量要求，旨在最大限度地规避潜在安全隐患，从而有效保护消费者的健康与安全。

⚑ No. 3: 感官质量缺陷&甲醛迁移量超标（各占比12.50%）

风险分析：本期通报中，甲醛迁移量超标与感官质量缺陷问题均涉及7起案例。对于甲醛迁移超标的产品，该有害物质在日常使用中易通过接触迁移进入人体，长期摄入可能大幅增加患白血病、恶性肿瘤及癌症等严重疾病的风险，对生命健康构成实质性威胁。与此同时，感官质量缺陷则集中表现为产品表面出现裂纹、清漆涂层剥落、材质腐蚀或存在颗粒部件异物等现象，此类缺陷不仅破坏了产品的物理完整性，更可能在使用过程中引发二次污染或潜在的安全隐患。

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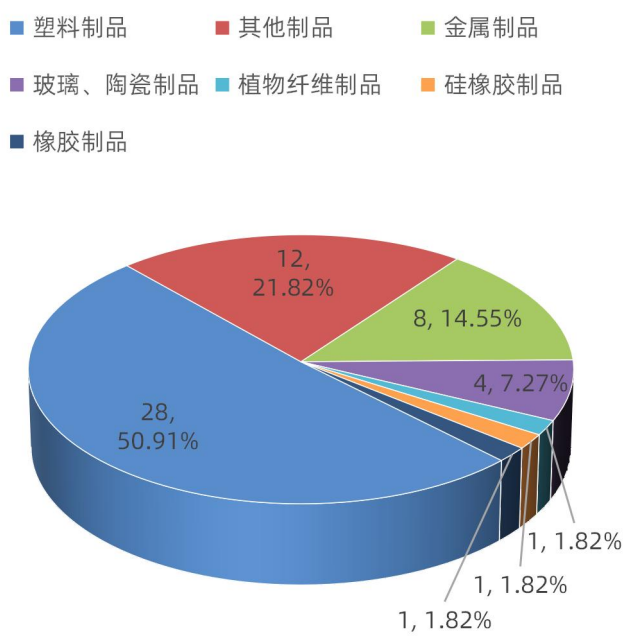
2. 通报产品分析

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（占比50.91%）

风险分析：本期通报涉及塑料制品的案例共计28起，在通报总量中占有较高比重。其核心违规原因主要聚焦于初级芳香胺（PAAs）、甲醛及三聚氰胺的迁移量超标。从产品类别来看，密胺材质的餐饮具与尼龙材质的厨房用具是通报风险最为集中的领域，暴露出此类材料在材质稳定性与成分合规性管控方面仍面临较大挑战。

⚑ No. 2: 其他制品（占比21.82%）

风险分析：本期通报中，“其他制品”类别共计涉及12起案例。该类别主要涵盖了原始通报信息中材质属性标注不明确的产品，其违规原因呈现出多样化特征，主要包括金属元素迁移量超标、感官质量缺陷以及程序性合规文件缺失等问题。在产品形态分布上，餐饮具类产品表现出较高的通报频次。

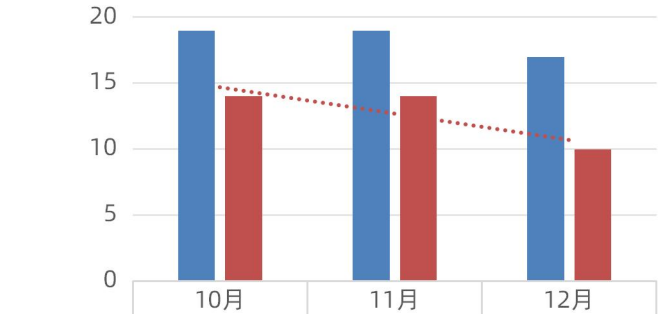
⚑ No. 3: 金属制品（占比14.55%）

风险分析：本期通报涉及金属制品的案例共计8起。其核心违规原因主要聚焦于金属元素迁移量超标以及感官质量缺陷。在感官质量方面，风险特征表现得尤为直观，具体涵盖了刀具类产品出现外观腐蚀、模具类产品表面涂层脱落等物理性缺陷。

3. 通报国家分析

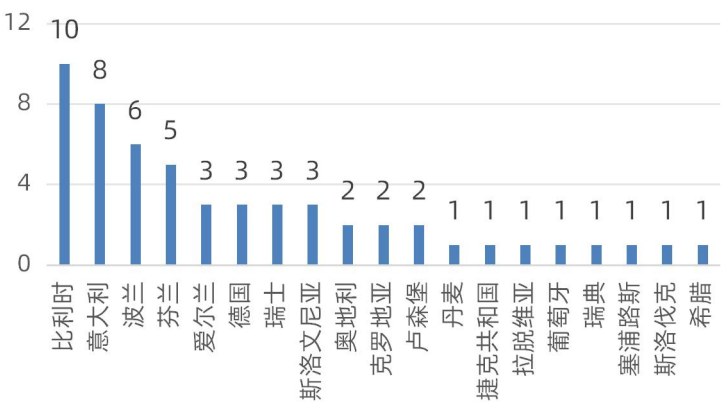
本期共计录得55例通报，其中原产地为中国的产品共38例，占比达69.09%。相较于去年同期的55.10%，通报占比呈现出明显的上升态势。回顾全年趋势，中国产品的通报占比在第二季度大幅回落后，于第三、四季度连续回升，但仍低于第一季度77.14%的历史高位。从通报发起国分布来看，本季度共有19个成员国参与监测反馈；其中，比利时通报量居首，共计10例，占比18.18%；意大利次之，共计8例，占比14.55%。

图3 对华产品通报情况



	10月	11月	12月
通报数量	19	19	17
对华通报	14	14	10

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	
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
全氟己酸(PFHxA)及其盐类和相关物质	(EU) 2024/2462	PFHxA及其盐类的总浓度＜25ppb，PFHxA相关物质的总浓度＜1000ppb	纸和纸板制品

·参考网站：

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

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