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China Food Contact Materials (FCMs) Regulatory Compliance

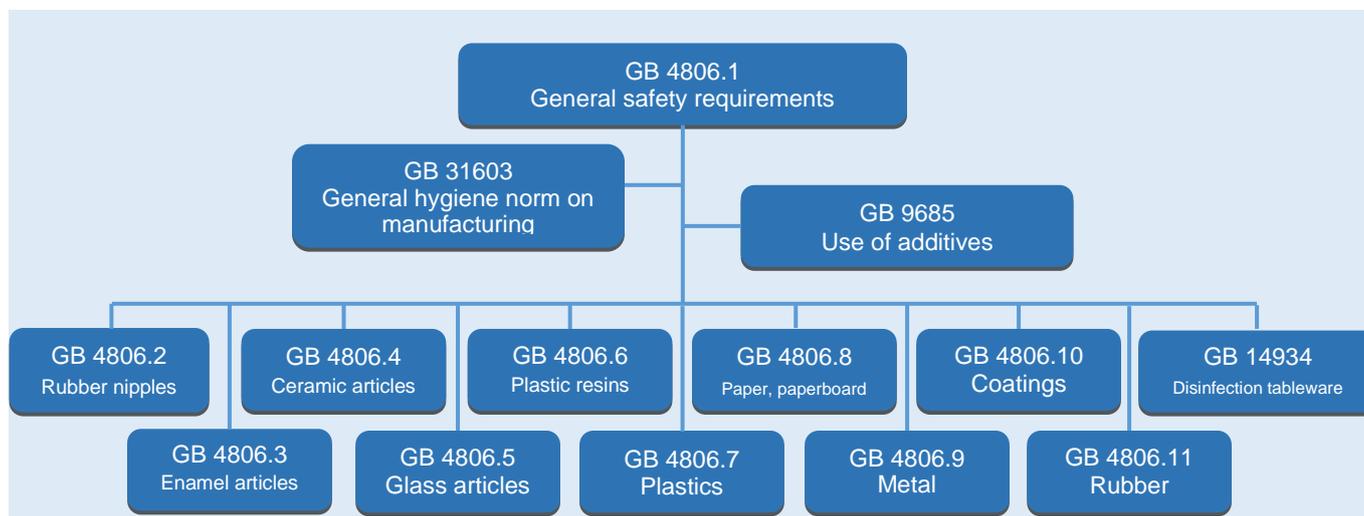
National Health and Family Planning Commission of the People's Republic of China (NHFPC) launched the work for the conformity of Chinese national standards as regards food safety in May 2014. NHFPC took lead in the work to form basic and product standards on food containers, packaging and other products. The new China regulatory framework of FCMs gradually takes shape along with the publication of new standards.

Up to November 2016, NHFPC had issued two general standards GB 4806.1 for general safety requirements and GB 9685 for the use of additives, and 11 product standards

covering rubber nipples (applicable on 22 September 2016), enamel articles, ceramics, glass articles, plastic resins, plastic articles, paper and paperboard, metal, coatings, rubber and disinfection tableware (GB 14934) . Meanwhile, the requirements for bamboo, wood, adhesives, composite materials, inks, lubricants, textile fibres are still under development. Notably, these product standards (excluding GB 4806.2 for rubber nipples) under the new China FCMs regulatory framework come into operation on 19 April 2017.

New China FCMs Regulatory Framework

The new FCMs regulatory framework in China includes general safety requirements, manufacturing norm, product and testing standards. The chart below shows the new framework (testing standards are not included).



New Standards and Dates of Implementation

Category	Standard Title	Implementation Date
General Standard	GB 4806.1-2016 National Food Safety Standard - General safety requirements of food contact materials and articles	19/10/2017
Manufacturing Norm	GB 31603-2015 National Food Safety Standard - General hygiene norm on manufacturing of food contact materials and articles	21/09/2016
Additive	GB 9685-2016 National Food Safety Standard - Standard for the use of additives for food contact materials and articles	19/10/2017
Product Standard	GB 4806.2-2015 National Food Safety Standard - Nipples	22/09/2016
	GB 4806.3-2016 National Food Safety Standard - Enamel articles	19/04/2017
	GB 4806.4-2016 National Food Safety Standard - Ceramic articles	19/04/2017
	GB 4806.5-2016 National Food Safety Standard - Glass articles	19/04/2017
	GB 4806.6-2016 National Food Safety Standard - Food contact plastic resins	19/04/2017
	GB 4806.7-2016 National Food Safety Standard - Food contact plastic materials and articles	19/04/2017
	GB 4806.8-2016 National Food Safety Standard -Food contact paper, paperboard and paper articles	19/04/2017
	GB 4806.9-2016 National Food Safety Standard - Food contact metal materials and articles	19/04/2017
	GB 4806.10-2016 National Food Safety Standard -Food contact coatings	19/04/2017
	GB 4806.11-2016 National Food Safety Standard - Food contact rubber materials and articles	19/04/2017
	GB 14934-2016 National Food Safety Standard -Disinfection tableware	19/04/2017



Our Solutions

➤ Raw Materials and Finished Products Testing

Materials: enamel, ceramic, glass, plastic, metal, paper and paperboard, coatings, rubber.

Tableware: cutlery, bowls, chopsticks, spoons, cups/glasses, trays.

Kitchenware: storage appliances, washing appliances, conditioning and cooking equipment.

Food packaging/containers: paper containers, metal vessels, plastic containers, plastic packaging bags/films.

Kitchen appliances: gas stoves, smoke exhausts, ovens, microwave ovens, sterilizers, dishwashers, juicers, blenders, coffee makers, electric kettles, rice cookers, induction stoves

Juvenile products: feeding bottles, nipples and drinking cups

Disinfection tableware



Test Items

- **Standard:** sensory, overall migration, potassium permanganate consumption, heavy metals (calculated as lead metal)
- **Specific migration:** migration of heavy metals such as Lead (Pb), Cadmium (Cd), Chromium (Cr), Nickel (Ni), Arsenic (As), Selenium (Sb) and Zinc (Zn); migration/residue of formaldehyde, phenols, aromatic amines, vinyl chloride, vinylidene chloride, styrene, acrylonitrile, caprolactam, bisphenol A (BPA), plasticisers (phthalates: DEHP, DINP, DNOP, DBP, DMP, DEP) , 2,6-Di-tert-butyl-4-methylphenol and 2,2'-Methylenebis(6-tert-butyl-4-methylphenol).
- **Microbial:** coliform group, pathogen (shigella/salmonella/staphylococcus aureus/hemolytic streptococcus), molds
- **Other:** fluorescent substances, decolouring test, loss on drying, ignition residues, n-hexane extractions, N-Nitrosamines and N-nitrosatable substances, volatiles /% (w/v)



➤ GB 9685 Conformity assessment of additives

As per the latest GB standards and NHFPC notifications, C&K Testing can assist you in the followings:

1. Identify whether the additives in your FCMs products are allowed substances;
2. Confirm the authorisation granted for the additives, including maximum usage, specific migration limits, maximum residue (QM) overall migration limits and other restrictions for use;
3. Food contact materials/articles and additives testing and compliance assessment;
4. Formulate Declaration of Conformity (DoC) on your behalf;
5. Help with notification of new types of food-related products;
6. Verify the identifications and labels of your FCMs products.

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Materials Testing

Our Solutions

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➤ Identifications of Food Contact Materials

According to *Norm on Inspection and Supervision of Imported Food Contact Products* released by General Administration of Quality Supervision, Inspection and Quarantine of the People's Republic of China (AQSIQ):

The labels and instructions on the imported food contact products or their packaging shall be prepared in regular Chinese characters (excluding trademarks) and shall meet the following requirements

- (1) Product name, materials, country/region of manufacture, importer name, contact and address shall be indicated;
- (2) Where the products are limited for use, use period shall be clearly indicated on a prominent place.
- (3) Appropriate conditions, warning labels or Chinese warning instructions shall be available when any misuse can easily do damage to the products or endanger consumers' health or their property safety.

By virtue of our local advantages and profound understanding of Chinese laws, regulations and standards as regards of food contact products, C&K Testing can render verification and translation services of food contact articles for clients.

➤ Other Services

- **Training:** regulations and supply chain
- **Consulting:** regulations and compliance solutions
- **Declaration of compliance (DoC)** for products or in the supply chain

Our Advantages

- CMA and CNAS accredited, reliable data & great international credibility
- Global network of testing facilities (Ireland, Beijing, Nanjing)
- One-stop services integrating testing, consulting and training
- Special offers on a regular basis
- Flexible solutions

