

Voluntary Report – Voluntary - Public Distribution

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Report Name: National Food Safety Standard for Use of Additives for Food Contact Materials and Articles Amendment Notified to WTO

Country: China - People's Republic of

Post: Beijing

Report Category: Sanitary/Phytosanitary/Food Safety, FAIRS Subject Report, Trade Policy Monitoring, WTO Notifications

Prepared By: FAS China Staff

Approved By: Adam Branson

Report Highlights:

On March 6, 2023, China notified an Amendment of the National Food Safety Standard for Use of Additives for Food Contact Materials and Articles to the World Trade Organization (WTO) under G/SPS/N/CHN/1263. The deadline for comment submission is May 5, 2023. The proposed date of entry into force is to be determined. Comments may be submitted by email to China's SPS Enquiry Point at sps@customs.gov.cn. This report provides an unofficial translation of the draft amendment.

Summary:

On March 6, 2023, China notified an Amendment of the National Food Safety Standard for Use of Additives for Food Contact Materials and Articles to the WTO under [G/SPS/N/CHN/1263](#). This amendment added or revised the usage requirements for the food contacting materials in Appendix A, Appendix B, and Appendix D of the National Food Safety Standard for Use of Additives for Food Contact Materials and Articles ([GB 9685-2016](#)) (link in Chinese), which went into effect in October 2017. This amendment also included coordination with National Food Safety Standard for the Use of Food Additives ([GB 2760-2014](#)). Comments on the WTO notified standard may be submitted by email to China's SPS Enquiry Point at sps@customs.gov.cn.

BEGIN TRANSLATION

GB 9685-2016 National Food Safety Standard
Standard for Use of Additives for Food Contact Materials and Articles
No. 1 Amendment Sheet
(Draft for comments)

This amendment is approved by the National Health Commission and State Administration for Market Regulation of the People's Republic of China in Announcement No. X on XX, XX, XX, and will be implemented as of XX, XX, XX.

(Modification Items)

I. Appendix A

1. The clause A.12 in the standard is amended as “Table A.7 specifies the scope of use, FCA number, Chinese name, CAS number, maximum usage, SML/QM, SML(T) and group numbers of SML(T) and related restrictive requirements of additives allowed for use in other food contact materials and products (silicone rubber, etc.). Additives allowed for use for rubber in GB 9685-2008 can also be used in the production of silicone rubber.”
2. The clause A.13 b) is amended as “Under conditions that produce no new functions for the food itself, the substances listed in Table A.2 of GB 2760-2014 can be used in accordance with the relevant requirements of this standard.”

3. Table A.6 for the allowed use of additives and their requirements for food contact paper, paperboard materials, and products is as follows:

Revised from:

FCA No.	Chinese Name	CAS No.	Maximum Usage/ %	SML/QM/ (mg/kg)	SML(T)/ (mg/kg)	SML(T)/ Group No.	Other Requirements
FCA1221	Oxidized starch, 2-hydroxy-3-(trimethylammonium) propyl ether chloride	221897-48-9	Be used in proper amount according to production needs (the maximum usage of sodium hypochlorite is 5.5%).				

Revised to:

FCA No.	Chinese Name	CAS No.	Maximum Usage/ %	SML/QM/ (mg/kg)	SML(T)/ (mg/kg)	SML(T)/ Group No.	Other requirements
FCA1221	Oxidized starch, 2-hydroxy-3-(trimethylammonium) propyl ether chloride	221897-48-9	Be used in proper amount according to production needs				The usage of sodium hypochlorite used in the production process shall not exceed 55g/kg of dry starch (by chlorine).

4. Modification of Chinese name of additives:

FCA No.	CAS No.	Chinese Name (before modification)	Chinese Name (after modification)
FCA0136	77-99-6	2,2-dimethylol butanol; 3-hydroxymethyl propane ; TMP	2,2-dimethylol butanol; Trimethylol propane ; TMP
FCA0670	129898-01-7	Sodium salt of acrylic acid and sodium hypophosphite polymer	Sodium salt of acrylic acid and sodium hypophosphite polymer
FCA0811	10508-09-5	Di-tert-amyl peroxide	Di-tert-amyl peroxide
FCA1020	9010-75-7	Copolymer of trichloroethylene chloride and vinylidene fluoride^a	Copolymer of chlorotrifluoroethylene and vinylidene fluoride
^a Chinese name in "Appendix E Catalogue of Additives in Food Contact Materials and Products"			

5. Table A.1 Modification of usage scope and maximum usage of allowable additives in food contact plastic materials and products:

FCA No.	Chinese Name	CAS No.	Scope of use and maximum usage (before modification)	Scope of use and maximum usage (after modification)
FCA0470	C.I. Pigment blue 15, Phthalocyanine blue, phthalocyanine copper	147-14-8	PE, PP, PS, PC, PA, PET, AS, ABS, PVC, PVDC, UP, PEI, PPE, PBT: be used in proper amount according to production needs; PBT , PMMA, POM, PU, PPS, PEI :1	PE, PP, PS, PC, PA, PET, AS, ABS, PVC, PVDC, UP, PEI, PPE, PBT: be used in proper amount according to production needs, PMMA, POM, PU, PPS:1

6. Modification of additives limits:

(1) Modification of FCA0064 Specific Migration Limits and Maximum Residue Limits:

Revised from:

FCA No.	Chinese Name	CAS No.	Maximum Usage/%	SML/QM/ (mg/kg)	SML(T)/ (mg/kg)	SML(T)/ Group No.
FCA0064	Polymer of 1,3-dihydro-1,3-dioxo-5-isobenzofuran formyl chloride and 4,4'-methylenedianiline	25928-85-2	be used in proper amount according to production needs	0.05 mg/dm² (trimellitic anhydride, QM); ND (aromatic primary amine, SML, DL = 0.01 mg/kg)	5	21

Revised to:

FCA No.	Chinese Name	CAS No.	Maximum Daily Usage/%	SML/QM/ (mg/kg)	SML(T)/ (mg/kg)	SML(T)/ Group No.
FCA0064	Polymer of 1,3-dihydro-1,3-dioxo-5-isobenzofuran formyl chloride and 4,4'-methylenedianiline	25928-85-2	be used in proper amount according to production needs	ND (4,4'-methylenedianiline, SML DL=0.002mg/kg)	5 (by trimellitic acid)	21

(2) Modification of FCA0306 specific migration limits in Table A.6:

Revised from:

FCA No.	Chinese Name	CAS No.	Maximum Usage/%	SML/QM/ (mg/kg)	SML(T)/ (mg/kg)	SML(T)/ Group
FCA0306	2-ethyl hexanol	104-76-7	be used in proper amount according to production needs			

Revised to:

FCA No.	Chinese Name	CAS No.	Maximum Usage/%	SML/QM/ (mg/kg)	SML(T)/ (mg/kg)	SML(T)/ Group No.
FCA0306	2-ethyl hexanol	104-76-7	be used in proper amount according to production needs	30 (SML)		

(3) Modification of FCA0852 specific migration limits:

Revised from:

FCA No.	Chinese Name	CAS No.	Maximum Usage/ %	SML/QM/ (mg/kg)	SML(T)/ (mg/kg)	SML(T)/ Group No.
FCA0852	Polymer of adipic acid with 2,2'-ethanol ether, 1,2- ethylene glycol, 1,3-terephthalic acid and 2-ethyl-2-(hydroxymethyl)-1,3-propylene glycol	-	be used in proper amount according to production needs	1 (trimethylolpropane: SML)	30 (by ethylene glycol); 5 (by isophthalic acid)	2;27

Revised to:

FCA No.	Chinese Name	CAS No.	Maximum Daily Usage/ %	SML/QM/ (mg/kg)	SML(T)/ (mg/kg)	SML(T)/ Group No.
FCA0852	Polymer of adipic acid with 2,2'- ethanol ether, 1,2-ethylene glycol, 1,3-terephthalic acid and 2-ethyl-2-(hydroxymethyl)-1,3-propylene glycol	-	be used in proper amount according to production needs	6 (trimethylolpropane: SML)	30 (by ethylene glycol); 5 (by isophthalic acid)	2;27

(4) Modification of FCA1092 specific migration limit:

Revised from:

FCA No.	Chinese Name	CAS No.	Maximum Daily Usage/%	SML/QM/(mg/kg)	SML(T)/(mg/kg)	SML(T)/Group No.
FCA1092	Copolymer of trimellitic anhydride and 1,1'-methylenebis (4-isooxyacid ester benzene)	25053-57-0	Be used in proper amount according to production needs	1 (by isocyanate, QM), 5 (SML, by trimellitic anhydride)	ND (DL=0.01mg/kg)	17

Revised to:

FCA No.	Chinese Name	CAS No.	Maximum Daily Usage/%	SML/QM/(mg/kg)	SML(T)/(mg/kg)	SML(T)/Group No.
FCA1092	Copolymer of trimellitic anhydride and 1,1'-methylenebis (4-isooxyacid ester benzene)	25053-57-0	Be used in proper amount according to production needs	1 (by isocyanate, QM)	ND (by oxo acid radical DL=0.01mg/kg), 5 (by trimellitic acid)	17; 21

II.

III. Appendix B

New restricted substances were added in Table B.1:

SML(T) Group No.	CAS No.	Name of Restricted Substances	SML(T)/(mg/kg)	Restriction Description
33	97-53-0	Eugenol	ND	By eugenol
	156065-00-8	α -dimethyl-3-(4'-hydroxy-3'-methoxyphenyl) propylsiloxane, ω -3-dimethyl-3-(4'-hydroxy-3'-ethoxyphenyl) propylsilyl polydimethylsiloxane		
34	1477-55-0	1,3- xylylenediamine	0.05	By 1,3-xylylenediamine
	3634-83-1	1,3- xylylenedioxy acid ester [SML (t) is suitable for its hydrolysis product 1,3-xylylenediamine]		
35	3724-65-0	2-butenic acid	0.05	By butenoic acid
	80181-31-3	Copolymer of 3-hydroxybutyric acid-3- hydroxyvaleric acid		
	147398-31-0	Poly (R)-3-hydroxybutyrate-co-(R)-3- hydroxycaproate		

III. Appendix D

New substance is added in table D.1:

No.	Abbreviation	English Name	Chinese Name
32	PVA or PVOH	Poly (viny l alcohol)	Polyvinyl alcohol

Attachments:

No Attachments.