

Voluntary Report – Voluntary - Public Distribution

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Report Name: General Safety Requirements of Food Contact Materials and Articles Notified

Country: China - People's Republic of

Post: Beijing

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

Prepared By: FAS China Staff and Joshua DeMoss

Approved By: Abigail Nguema

Report Highlights:

On August 29, 2025, China notified a National Food Safety Standard for General Safety Requirements of Food Contact Materials and Articles to the WTO under G/SPS/N/CHN/1293/Add.1. This standard includes a definition, migration amount, maximum residue, and raw material requirements. This report provides an unofficial translation of the notified draft standard. Comments may be submitted to China's SPS National Notification and Enquiry Center at sps@customs.gov.cn until October 28, 2025.

FAS China provides this reporting and analysis as a service to U.S. farmers, ranchers, rural communities, and agribusinesses in support of a worldwide agricultural information system and a level playing field for U.S. agriculture.

Report Summary:

On August 29, 2025, the People's Republic of China (China) notified the National Food Safety Standard for General Safety Requirements of Food Contact Materials to the World Trade Organization (WTO) under [G/SPS/N/CHN/1293/Add.1](#). Once finalized, it will replace the regulations of GB 4806.1-2016 and GB 4806.13-2023.

China previously notified the draft to the WTO under [G/SPS/N/CHN/1293](#) on October 25, 2023. Please see FAS GAIN Report [CH2023-0154](#) for more detailed information. The newly notified draft integrated the provisions of GB 4806.13-2023 National Food Safety Standard Food Contact Composite Materials and Articles and includes revisions made under Article 4 Principles of Conformity and Article 7 Product Information.

This report provides an unofficial translation of the notified standard. Comments may be submitted to China's SPS National Notification and Enquiry Center at sps@customs.gov.cn until October 28, 2025. Stakeholders should conduct their own review of the regulations to assess any market or regulatory impact on their business.

BEGIN UNOFFICIAL TRANSLATION

National Food Safety Standard of General Safety Requirements of Food Contact Materials and Articles

(Draft for Comment)

Forward

This document replaces GB 4806.1-2016 National Food Safety Standard of General Safety Requirements of Food Contact Materials and Articles and GB 4806.13-2023 National Food Safety Standard Food Contact Composite Materials and Articles.

This document made following modifications comparing with GB 4806.1-2016 and GB 4806.13-2023:

- Modified Description of Scopes,
- Revised Terms and Definitions,
- Modified Basic Requirements,
- Changed Maximum Levels Requirements and Principles of Conformity, and integrated relevant content from GB 4806.13-2023,
- Revised Product Information and integrated relevant content from GB 4806.13-2023.

1. Scope

The standard specifies the terms and definitions, basic requirements, conformity principles, testing methods, traceability, and product information of food contact materials and articles.

The standard is applicable to all types of food contact materials and articles.

2. Terms and Definitions

2.1 Food contact materials and articles

Under common conditions of use, various materials and products that have or are expected to come into contact with foods or food additives (hereinafter referred to as foods), or whose components may be transferred to foods, including packaging materials, containers, tools, and equipment during food production, processing, packaging, transportation, storage, sales, and usage, as well as inks, adhesives, lubricants, etc. that may directly or indirectly come into contact with foods. It does not include food related products such as detergents and disinfectants, and products related to drinking water hygiene and safety.

2.2 Composite materials and articles

Two or more layers of food contact materials and articles made of different materials or same materials through bonding, melting, or other methods.

2.3 Combined materials and articles

Food contact materials and articles that are composed of two or more different or same materials through assembling, welding, inlay, etc.

2.4 Overall migration

Total non-volatile substances migrating from food contact materials and articles to the food simulants in contact with them, expressed as milligrams of non-volatile migrating substances per kilogram of food simulants (mg/kg), or milligrams of non-volatile migrating substances per square decimeter of contact area (mg/dm²). It is expressed in mg/kg for food contact materials and articles specially designed for infants and young children.

2.5 Overall migration limit (OML)

Maximum allowable migration amount of all non-volatile substances from food contact materials and articles into food simulants, expressed in milligrams of non-volatile migrating substances per kilogram of food simulants (mg/kg), or milligrams of non-volatile migrating substances per square decimeter of contact area (mg/dm²). It is expressed in mg/kg for food contact materials and articles specially designed for infants and young children.

2.6 Maximum usage amount

The maximum allowable amount of a certain substance or certain types of substances added during the production of food contact materials and articles, expressed in mass fraction (%).

2.7 Specific migration amount

The amount of a certain substance or types of substances migrating from food contact materials and articles to the food or food simulants in contact with them, expressed in milligrams of migrating substance per kilogram of food or food simulants (mg/kg), or expressed as milligrams of migrating substances per square decimeter of the area where food contact materials and articles are in contact with food or food simulants (mg/dm²).

2.8 Specific migration limit (SML)

The maximum allowable amount of a certain substance or types of substances migrating from food contact materials and articles to food or food simulants in contact with them, expressed in milligrams of migrating substances per kilogram of food or food simulants (mg/kg), or expressed as milligrams of migrating substances per square decimeter of the area where food contact materials and products are in contact with food or food simulants (mg/dm²).

2.9 Specific migration amount in total

The total amount of two or more substances migrating from food contact materials and articles to the food or food simulants in contact with them, expressed as a specified migrating substance or types of substances (or group) per kilogram of food or food simulants, or milligrams of a specified type or types of migrating substances (or group) per square decimeter of the area where food contact materials and articles are in contact with food or food simulants (mg/dm²).

2.10 Specific migration amount limit in total [SML(T)]

The maximum allowable total amount of two or more substances migrating from food contact materials and articles to the food or food simulants in contact with them, expressed as a specified milligrams of migrating substance or types of migrating substances (or group) per kilogram of food or food simulants (mg/kg), or the milligrams of a specified certain type or types of migrating substances (or groups) per square decimeter of area where food contact materials and articles are in contact with food or food simulants (mg/dm²).

2.11 Residue amount

The amount of a certain type or types of residual substances in food contact materials and articles, expressed as the milligrams of residual substances per kilogram of food contact materials and articles (mg/kg), or as milligrams of residual substances per square decimeter of area of food contact materials and articles in contact with foods (mg/dm²).

2.12 Maximum residue limit

The maximum allowable amount of a certain type or types of residual substances in food contact materials and articles, expressed as milligrams of residual substances per kilogram of food contact materials and articles (mg/kg), or as milligrams of residual substance per decimeter area of food contact materials and articles in contact with foods (mg/dm²).

2.13 Unintentionally added substances

Non-artificially added substances contained in food contact materials and articles include impurities introduced by raw and auxiliary materials, decomposition products, contaminants, and residual reaction intermediates during production, operation, and use.

2.14 Effective barrier layer

A barrier composed of one or more layers of materials in food contact materials and articles, is used to prevent the migration of specific substances from outside (non-food contact side) and ensure that food contact materials and articles meet the corresponding safety requirements under common usage conditions, and the amount of substances that migrate into food that are not listed in the corresponding national food safety standards or announcements shall not exceed 0.01 mg/kg.

2.15 Final products

Materials and articles that can directly come into contact with foods without any additives or other ingredients added for further processing, such as plastic wrap, paper cups, rice cooker liners, etc.

3. Basic Requirements

3.1 When food contact materials and articles come into contact with foods under common conditions for use, amount level of substances that migrate into foods should not endanger human health.

3.2 When food contact materials and articles come into contact with foods under common conditions for use, the substances that migrate into foods should not cause changes in the composition, structure, color, flavor, and other properties of foods, and should not produce technical functions for foods (except when there are special regulations).

3.3 The substances used in food contact materials and articles should be reduced as much as possible when the expected effect can be achieved.

3.4 Substances used in food contact materials and articles should comply with corresponding quality specifications.

3.5 Producers of food contact materials and articles should conduct safety assessment and control of unintentionally added substances in products, so that substances transferred into foods comply with 3.1 and 3.2 of this Standard.

3.6 The production of food contact materials and articles should comply with the requirements of GB 31603 and the corresponding national food safety standards for various materials.

3.7 Producers of food contact materials and articles should ensure the effectiveness of effective and complete barrier layers within the validity period under common use conditions.

4. Principles of Conformity

4.1 General requirements

4.1.1 Raw materials used in food contact materials and articles shall comply with national food safety standards and relevant announcements.

4.1.1.1 The use of resins and basic ingredients in food contact materials and articles should comply with the corresponding national food safety standards and provisions of relevant announcements. The use of additives should comply with the provisions of GB 9685 and relevant announcements.

4.1.1.2 The food ingredients allowed for use in China can also be used in the production of food contact materials and articles, and the relevant ingredients should comply with the corresponding food safety requirements and/or relevant announcements.

4.1.1.3 Substances that are not included in the corresponding national food safety standards and announcements can be used for food contact materials and articles outside the effective barrier layers. Producers of food contact materials and articles should conduct safety assessment and control of the substances to make the specific migration amount not exceeding 0.01 mg/kg to ensure the final products comply with the provisions of 3.1 and 3.2 of this Standard. The above principles are not applicable to carcinogenic, teratogenic, mutagenic substances, and nanomaterials.

4.1.2 The total migration level, usage level, specific migration level, total specific migration level, and residue level of food contact materials and articles shall comply with the requirements of the relevant national food safety standards and announcements.

4.1.2.1 For the same substance (or group of substances) for which both an SML (or SML(T)) and a QM are specified, the SML (or SML(T)) shall be prioritized for verification of compliance.

4.1.2.2 For the same substance (or group of substances) listed in both GB 9685 and the corresponding national food safety standards for various materials, the migration limit of the substance (or group of substances) in food contact materials and articles shall comply with the minimum limit values for the corresponding items. The limit values shall not be cumulative.

4.1.3 The microbial limits for food contact materials and articles shall comply with the provisions of the corresponding national food safety standards.

4.1.4 Food contact materials and articles shall comply with the restricted use requirements specified in the corresponding national food safety standards and relevant announcements, including restricted food contact categories, restricted user populations, operating temperatures, and operating times.

4.2 Requirements for food contact materials and articles composed of multiple materials

4.2.1 For food contact materials and articles composed of multiple materials, such as composite materials and articles, combined materials and articles, and coated articles, each type of material must comply with the relevant national food safety standards and announcements.

4.2.2 The sensory requirements for composite materials and articles and coated articles must comply with the sensory requirements specified in the relevant national food safety standards for materials in direct food contact.

4.2.3 For food contact materials and articles composed of multiple materials, such as composite materials and products, combined materials and products, and coated products, the final product must comply with the physical and chemical indicators specified in the corresponding national food safety standards for each material. Specifically, the total migration, potassium permanganate consumption, heavy metal (measured as Pb), and discoloration tests for composite materials and products and coated products shall be conducted in accordance with the relevant national food safety standards for materials in direct food contact.

4.2.3.1 For food contact materials and articles composed of multiple materials, such as composite materials and products, combined materials and products, and coated products, when different materials within the same food contact material have migration limit requirements for the same item, the food contact material and product as a whole shall comply with the minimum limit for that item, and the limits shall not be cumulative.

4.2.3.2 For composite materials and products, combined materials and products, and coated products, the maximum usage amount, maximum residue amount, and residue index specified in the corresponding national food safety standards and relevant announcements for each material shall apply only to that material.

4.2.4 The restricted food categories of food contact materials and products made of composite materials and products, combined materials and products, coated products and other materials shall comply with the relevant national food safety standards and relevant announcements for direct food contact materials; other restricted use requirements shall comply with the relevant national food safety standards and relevant announcements for various materials.

5. Testing Methods

5.1 The migration tests of food contact materials and articles should comply with the provisions of GB 31604.1 and GB 5009.156. When there are special provisions in the national food safety standards of the product, the provisions of the product standards shall be followed.

5.2. Related items of food contact materials and articles should be measured using methods in the national standards. If there is no corresponding national standard available for the testing, other testing methods that have been fully technically verified can be used.

6. Traceability

6.1 Producers of food contact materials and articles should establish a product traceability system to ensure the traceability of food contact materials and articles at all stages.

6.2 The traceability system should ensure that the source and destination information of food contact materials and articles and compliance information of related substances or materials can be obtained.

7. Product Information

7.1 General requirements

7.1.1 Product information for food contact materials and articles should include labeling identification and conformity statement. Product information should be true, accurate, and sufficient to ensure that there is sufficient information for safety assessment, compliance verification, and correct usage of food contact materials and articles.

7.1.2 Producers and operators shall provide downstream producers and operators with a Declaration of Conformity documenting the product's compliance with national food safety standards and relevant announcements.

7.1.3 Final products shall be clearly labeled, eye-catching, and easily identifiable.

7.2 Conformity statement

7.2.1 The conformity statement should include the product name, materials, the code and sequence number of the corresponding national food safety standards, the list of substances with restrictive requirements and their restrictive requirements.

7.2.1.1 Product names should reflect the true nature of the product and should not cause misunderstanding or confusion. When one or more product names have been specified or adopted in national standards, industry standards, or related announcements, one of these names or a name essentially equivalent to the aforementioned names should be selected as the product name.

7.2.1.2 Materials should be labeled using the general category names specified in national food safety standards and relevant announcements. Where no general category names are available, the broad category name (e.g., ceramics, inks, etc.) should be used. Materials with multiple layers or components should be labeled separately. Composite materials and products should be labeled in order from the outer layer to the layer directly in contact with food, including adhesives, coatings, and inks, separated by slashes “/”. If specific national food safety standards exist for various materials, those provisions shall prevail.

7.2.1.3 Precautions for use should include restrictions on use as specified in national food safety standards and relevant announcements (e.g., restricted user groups, restricted food contact categories, operating temperature, operating time, and whether or not to reuse the product). Products that require usage within a certain period of time should also be labeled with the safety use period.

7.2.1.4 Substances with restrictive requirements include those with maximum usage limits, specific migration limits, total specific migration limits, maximum residue limits, and other restrictive requirements specified in national food safety standards and announcements, as well as unintentional added substances that require safety assessment and control.

7.2.2 When necessary, the conformity statement shall also include the Chinese name and CAS number of the ingredients used (when applicable).

7.2.3 When ingredients, production processes, and other factors that may affect product safety changed, manufacturers and distributors of food contact materials and articles should renew the conformity statement in a timely manner.

7.3 Label identification

7.3.1 Product label identification should comply with laws and regulations, national food safety standards, and relevant announcements.

7.3.2 Product label identification should include product name, materials, production date, name, address, and contact information of the producer and/or distributor, the code and sequence number of the corresponding national food safety standards for the materials in compliance, precautions for use, etc. The product name, materials, and precautions for use shall comply with the requirements of clauses 7.2.2.1, 7.2.2.2, and 7.2.2.3 of this Standard, respectively.

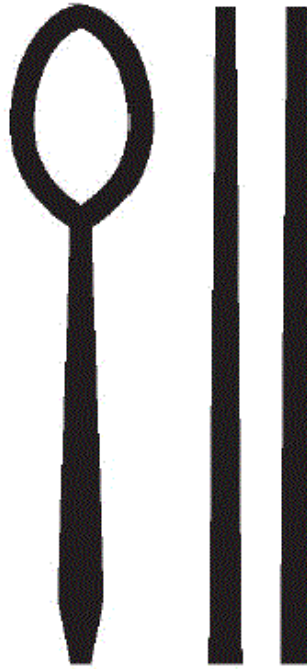
7.3.3 Food contact materials and articles should also be marked with “for food contact use” or “for food packaging use” or similar terms, or be printed or affixed with a spoon and chopsticks logo (see Appendix A for details).

7.3.4 The label identification should be at a conspicuous place on the smallest sales unit of food contact materials and articles. If all the information cannot be displayed on the smallest sales unit due to technical reasons, it can be displayed in the product manual or accompanying documents.

Appendix A

Spoon and Chopsticks Logo

Please see Picture A for the spoon and chopsticks logo.



Picture A: Spoon and Chopsticks Logo

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Attachments:

[CHN1293ADD1 General safety requirements of food contact materials and articles.pdf](#)