

China Mandatory Standard Updates Regarding Food Contact Paper and Paper Board, Bamboo and Wood Materials and Products

The National Health Commission (NHC) of China published numerous national standards regarding food safety. Two of them are mandatory standards regarding safety requirements of food contact materials. They are applicable to paper and paper board, bamboo and wood materials and products. The below table provides highlights of the two standards.

- GB 4806.8-2022 will be implemented as of 30 June 2023 and will replace GB 4806.8-2016. The table below summarizes the key changes between the current and new version of this standard.

Section	GB 4806.8-2022	GB 4806.8-2016	Remark
1 Scope	<ul style="list-style-type: none"> Removed non-applicable scope, only retained that applicable to food contact paper and paper board materials and products. 	<ul style="list-style-type: none"> Provided applicable scope together with product scope that is not applicable. 	<ul style="list-style-type: none"> Regenerated cellulose film (glass paper) will be regulated by separate standard.
4 Technical requirements			
4.2 Sensory	<ul style="list-style-type: none"> Focus on "abnormal" discoloration in soaking solution. Discoloration from paper and paper board that haven't been bleached and have no added colorants shall not be considered as abnormal discoloration. 	<ul style="list-style-type: none"> Specified sensory requirements of product and soaking solutions. 	<ul style="list-style-type: none"> Slight discoloration caused by migration of lignin is allowed for paper and paper board haven't been bleached and have no added colorants, which become more commonly found on the market.
4.3 Physicochemical parameters	<ul style="list-style-type: none"> Added requirements of 1, 3-dichloro-2-propanol (1, 3-DCP, not detected that DL = 2 µg/L), 3-monochloro-1, 2-propanediol (3-MCPD ≤ 12 µg/L). Added overall migration limit for infant's products (≤ 60 mg/kg). Deleted consumption of potassium permanganate. 	<ul style="list-style-type: none"> Specified requirements of lead, arsenic, formaldehyde, fluorescent substances, overall migration, consumption of potassium permanganate, heavy metal as lead. 	<ul style="list-style-type: none"> Added 1, 3-DCP and 3-MCPD based on industrial application for paper with wet strength resin treatment. Aligned overall migration limit of infant's products with other standards. Removed consumption of potassium permanganate from paper that caused by lignin and total sugar
4.4 Microbiological parameters	<ul style="list-style-type: none"> Added pretreatment procedures of mold testing. 	<ul style="list-style-type: none"> Specified requirements of E. coli and salmonella and mold. 	-
4.5 Other technical requirements	<ul style="list-style-type: none"> Materials such as paint, printing inks, adhesives, etc. shall comply with relevant standards. 	-	-
5 Others			
5.1 Migration test	<ul style="list-style-type: none"> Deleted screening test of specific migration. 	<ul style="list-style-type: none"> Specified general requirements, special requirements, screening test of specific migration. 	<ul style="list-style-type: none"> Screening test of specific migration has been included into GB 31604.1.
Appendix A	<ul style="list-style-type: none"> Added 40°C as borderline to determine preparation of hot water or cold water extraction. 	<ul style="list-style-type: none"> Specified preparation of water extraction. 	-
Appendix C	<ul style="list-style-type: none"> Specified test method of 1, 3-DCP and 3-MCPD. 	-	-

2. GB 4806.12-2022 is a newly published standard that will be implemented as of 30 December 2022. This standard applies to bamboo, wood, cork wood materials and products, including cork and plant fiber products. The below table highlights the key points of this standard.

Section	GB 4806.12-2022
4 Technical requirements	
4.2 Sensory	<ul style="list-style-type: none"> Appearance: shall have normal colour, without burr, damages from insect (not applicable to cork), peculiar odour, mold and other contaminants. Solution from migration test: shall have no precipitation, abnormal discoloration, odour, or any other sensory deterioration.
4.3 physicochemical parameters	<ul style="list-style-type: none"> Overall migration $\leq 10 \text{ mg/dm}^2$ or 60 mg/kg for infant's products, applicable to products treated with coating, adhesive, printing ink. Migration of Formaldehyde $\leq 15 \text{ mg/kg}$ Migration of Sulphur dioxide $\leq 10 \text{ mg/kg}$ Migration of Pentachlorophenol and its salts (counted as pentachlorophenol) $\leq 0.15 \text{ }\mu\text{g/kg}$ Thiabendazole $\leq 1.2 \text{ mg/kg}$ o-Phenylphenol $\leq 4.8 \text{ mg/kg}$ Imazalil $\leq 0.4 \text{ mg/kg}$ Biphenyl $\leq 0.6 \text{ mg/kg}$ Additives shall comply with GB 9685 and relevant notifications
4.4 Microbiological parameters	<ul style="list-style-type: none"> Products in contact with food that will not go through cleaning or sterilization shall comply with GB 14934.
4.5 Other technical requirements	<ul style="list-style-type: none"> Coating, adhesive, printing ink been applied on the products shall also comply with their relevant standards.
5 Others	
5.1 Migration test	<ul style="list-style-type: none"> Shall follow GB 31604.1 and GB 5009.156, unless been specially provided in this standards.
5.2 Labelling	<ul style="list-style-type: none"> Shall comply with GB 4806.1.
Appendix A	<ul style="list-style-type: none"> Specified test method of migration of sulphur dioxide.
Appendix B	<ul style="list-style-type: none"> Specified test method of Thiabendazole, o-Phenylphenol, Imazalil, Biphenyl.

How Does this Impact You? Contact Us to Discuss

Any comments and/or questions please contact your local customer service representative or email to:
China – Shanghai: contact-cn@bureauveritas.com

Bureau Veritas Consumer Products Services, Inc. ("BVCPS") provides the information in this client bulletin as a resource of general information. It does not replace any applicable legal or regulatory requirements and is provided "as is." BVCPS will not be liable for any indirect, special, punitive, consequential or other damages (including without limitation lost profits) of any kind in connection with this client bulletin. BVCPS DISCLAIMS ALL REPRESENTATIONS AND WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WITHOUT LIMITATION WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, IN CONNECTION WITH THIS CLIENT BULLETIN