



PRODUCT COMPLIANCE REPORT

Food Contact Products

Overview

Product Name	316L Stainless Steel Vacuum Bottle
Company Name	None
Country/Market	EU
Date	2021-10-13

Product Information

Selected Category: Food Contact Products

Is this product designed for children?: No

Is your product a single-use plastic?: No

Does this FCM product contain plastic parts, adhesives, or coatings?: Yes

Does this product contain BADGE, BFDGE, or NOGE?: No

Does this FCM product contain recycled plastic parts?: Yes

Is this FCM product made of ceramics?: No

Does this FCM product contain active and intelligent materials?: No

Is this FCM product made of regenerated cellulose film?: No

Is this FCM a cup or bottle intended for infants or young children?: No

Is this FCM product a teat or soother?: No

Is this FCM product originating from Mainland China or Hong Kong S.A.R (China)?: Yes





Is this product generally not recognized as a food contact material?: No

Is product packaging included?: Yes

Is the packaging material made of wood or include wooden pallets?: No

Are you selling cross-border (B2C) to consumers in the EU?: No

Icons

-  **Documentation/Certification**
-  **Product & Packaging Labeling**
-  **Product Lab Testing**
-  **Learn More (Sources)**

Important Information

Disclaimer: The content in the PDF report is provided for general information purposes only. The content includes summaries written by our team members based on publicly available information about product safety standards, labeling, documentation, testing, processes, and other product compliance-related topics. However, we don't guarantee that we cover every single relevant regulation/standard/requirement applicable to a certain product (We only cover the regulations/directives/rules listed in [this document](#)), or that the information is free from errors, or covering every single option, scenario, or exemption. We do make mistakes from time to time. We never provide legal advice of any sort.

Input Options: The report is generated based on your inputs. This is how the information in the report is structured:

a. Country/Market: Generates compliance requirements are broadly relevant to products belonging to your selected product category. Note that this is a general summary and there are exceptions.

b. Product Category: Generates compliance requirements are broadly relevant to products belonging to your selected product category. Note that this is a general summary and there are exceptions.

c. Specifications: Specify materials, age group, and other options that may impact which compliance requirements apply to a certain product. These input options differ depending on the selected product category. Keep in mind that we never guarantee that we cover every single input option that may be relevant to all products that fall within the scope of each product category.

Changes/Updates: Product standards and substance restrictions are subject to frequent updates and changes. In addition, new regulations, standards, and/or requirements may also become effective at any time. We review a predetermined list of official EU and US sources to stay up to date with updated product certification, labeling, testing, and other compliance requirements. We send the reports monthly to our customers by email - and clarify which (if any) of the update requires an update to the Compliance Report Tool database.

1. We do not guarantee that all updates are made in real-time. There can be a delay from the implementation of new requirements until we have updated the tool.

2. We do not guarantee that we 'catch' every single new or updated compliance requirement.

3. We recommend that you consult a lab testing company to get the latest information about mandatory standards/regulations in your market, country, or state. Lab testing companies generally stay up to date on new and updated standards and regulations.

Learn more:

- [Monthly Compliance Update \(PDF\) Sample](#)
- [Monthly Review Methodology \(PDF\)](#)

National/State-Level Standards/Regulations: The report doesn't cover all European national and US state standards, regulations, and requirements. We recommend that you consult a testing company or other professional to confirm all relevant (and current) national/state-level standards and regulations.

Sources: We link to official website sources in this report under **Learn more**, where you must go to find additional information about each topic.

Technical problems: The tool could malfunction as a result of programming bugs, hacking or other software interfering with the Compliance Report Tool. This can in turn result in the report missing information or containing for other reasons incorrect information. We test the tool* on a monthly basis, but cannot guarantee that this will never happen.

*Testing on Chrome and Safari browsers on desktop (Macbook Air M1 Chip 2020) only. We do not test on other website browsers or mobile devices.

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The Agreement shall be governed by and construed in accordance with the internal laws of the Hong Kong Special Administrative Region of the People's Republic of China. Any conflict or dispute between the Parties that may arise in connection with this Agreement shall be exclusively submitted to the competent civil court in Hong Kong.



Product Category

These compliance requirements are broadly relevant to products belonging to your selected product category. Note that this is a general summary and there are exceptions.

EU Food Contact Materials Framework Regulation

Product Category: **Food Contact Products**

The EU Food Contact Materials Framework Regulation applies to all food contact materials (FCM), including metals, plastic, and paper. FCM products shall not pose a risk to human health and alter the composition, taste, or smell of the food or beverage it contains.

Restricted Substances

The EU framework regulation sets specific substance requirements for plastic, metals, paper, and other food contact materials. This includes toxic substances and heavy metals, such as lead and cadmium.

Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.

Learn More

Legislation ([Link](#))

Declaration of Compliance (DoC)

You may need to issue a Declaration of Compliance (DoC). This is a self-issued document that summarizes product information, applied testing processes, storage, and importer information.

Overview

- Company
- Address
- Product name/SKU
- Date
- Applicable EU FCM regulations/standards
- Types of food or beverage the FCM product is made for
- Testing process information
- Treatment (e.g. storage, time, and temperature)

Learn More

Union Guidance on Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food as regards information in the supply chain ([Link](#))

Product Traceability

You may need to affix a permanent traceability code to the product and its packaging. The traceability code can include the following information:

- Importers name
- Address
- Contact details
- SKU
- Batch ID

Example: SKU-YYMM-01-CN

Learn More

Legislation ([Link](#))

Good Manufacturing Practice (GMP)

The manufacturer may also need to follow certain manufacturing and facility hygiene guidelines. This is generally referred to as Good Manufacturing Practice (GMP).

Examples

1. Incoming materials and components quality control records
2. Material and components traceability records (e.g. supplier invoices and Batch ID)
3. Written facility and equipment cleaning and maintenance procedures
4. Facility and machinery images and descriptions
5. Defective product action plan
6. Pre-Shipment Quality Inspection reports

Learn More

Commission Regulation (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food ([Link](#))



Specifications

This part of the report is a general summary of product compliance requirements generated based on your selected inputs on the specifications page.

Regulation (EU) No 10/2011: Plastic FCM

Does this FCM product contain plastic parts, adhesives, or coatings? Yes

This regulation sets additional requirements for the following food contact products:

- Plastic products or products that contain plastic components
- Products covered by surface coating
- Adhesives

Authorised Substances

1. The regulation lists authorized substances, which are the only substances that can be used during the manufacturing of plastic food contact products. See ANNEX I - Table 1 in source 2.
2. Substances/materials that are not listed as authorized substances cannot be used. As such, certain composites (e.g. bamboo and melamine plastics) are not allowed for food contact usage.

Substance Limits

1. The regulation sets substance restrictions (e.g. limits on the amount of certain substances in the material) and migration limits. Third-party testing companies can help you confirm applicable substance limits, migration limits, and corresponding tests.

Learn More

1. Legislation ([Link](#))
2. COMMISSION REGULATION (EU) No 10/2011 ([Link](#))

Regulation (EC) No 282/2008: Recycled Plastic FCM

Does this FCM product contain recycled plastic parts? Yes

This regulation sets additional requirements for recycled plastic materials and articles intended to come into contact with foods, including the following:

- a. Only recycled plastic obtained from a single recycling process can be used
- b. The recycling process shall be managed by an adequate quality assurance system

Learn More: Legislation ([Link](#))

Regulation (EU) No 284/2011: FCM from China or Hong Kong

Is this FCM product originating from Mainland China or Hong Kong S.A.R (China)? Yes

This regulation sets additional requirements when importing polyamide and melamine plastic FCM originating in or consigned from Mainland China and Hong Kong S.A.R.

It is necessary to include a declaration that states the conformity with the requirements concerning the release of primary aromatic amines and formaldehyde.

A test report shall be attached to the declaration, concerning the following substances detection limits:

- a. Primary aromatic amines in polyamide kitchenware < 0.01 mg per kg of food
- b. Formaldehyde in melamine kitchenware < 15 mg per kg of food

 **Learn More:** Legislation ([Link](#))

Directive 94/62/EC: Packaging & Packaging Waste

Is product packaging included? **Yes**

Importers and manufacturers must ensure that the packaging materials are compliant. Below follows a brief summary of packaging materials and waste requirements in the European Union.

Heavy Metals Restrictions


Directive 94/62/EC limits heavy metals, including lead, mercury, and cadmium in packaging materials, printing inks, and dyes.

Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.


Packaging Design

Packaging design and material should enable and simplify the collection, reuse, and material recycling.

 **Learn More:** Packaging and Packaging Waste ([Link](#))

IMPORTANT

Scope: This report only covers packaging materials for general consumer products. For example, it does not apply to food packaging, chemicals, household products, or pharmaceuticals.

 **Labeling Requirements:** Note that additional packaging labeling requirements may apply depending on the product, materials, and/or age group. Here are some examples:

- CE mark
- WEEE mark
- FCM symbol
- Energy label
- Recycling symbols
- Traceability information



Country/Market

These compliance requirements broadly apply to consumer products in your selected country or market. Note that this is a general summary and there are exceptions.

REACH

Market: **European Union**

REACH restricts chemicals, heavy metals, and pollutants in all consumer products sold in the European Union. Products and materials containing excessive amounts of restricted substances are non-compliant.

Examples

- Phthalates
- Arsenic chloride
- Nickel
- Lead
- Cadmium
- Mercury

Annex XVII

Annex XVII lists restricted substances. Any product containing listed substances above the set limits are illegal to import and sell to the EU.

Substances of Very High Concern (SVHC)

1. Under the Waste Framework Directive (WFD), SCIP database registration is mandatory if your products contain more than 0.1% of any substance listed on the SVHC candidate list.
2. You may also need to inform consumers.

Persistent Organic Pollutant (POP) Regulation

Persistent Organic Pollutants (POP) include certain types of pesticides, industrial chemicals, by-products, degradations, or combustions. While not part of REACH, POP restrictions are covered by Regulation (EU) 2019/1021.

Lab Testing

1. Third-party lab testing generally is required to verify if a certain product/material is REACH compliant. Lab testing should include Annex XVII listed substances, POPs, and SVHC candidate listed substances.
2. Testing companies also keep track of relevant substance restrictions (including limits) and assess which substances to include in the testing procedures. As such, you don't need to keep track of the current list of restricted substances or their respective limits.

Learn More

1. REACH ([Link](#))
2. Importer ([Link](#))
3. Substances restricted under REACH ([Link](#))
4. SCIP Database ([Link](#))

5. Understanding POPs ([Link](#))

General Product Safety Directive (GPSD)

Market: **European Union**

The purpose of the General Product Safety Directive (GPSD) is to ensure that consumer products sold in the EU are safe. The GPSD references safety standards and testing standards for a wide range of products. That said, the GPSD requires that all consumer products are generally safe - even if no specific standards are in existence.

GPSD Labeling Examples

- Manufacturer or importer identity (company name)
- Manufacturer or importer details (address, contact details, other relevant information)
- Product and batch identification (Model number, SKU, batch ID)
- Risk description (if applicable)
- Description of the action undertaken to prevent risks to consumers (if applicable)
- Disposal instructions and warnings (if applicable)

Lab Testing

Third-party lab testing is often required to verify compliance with the applicable standards and other requirements.

Learn More

General product safety ([Link](#))

Manufacturer/Importer Information

Market: **European Union**

Manufacturer/Importer information on the product and/or packaging is required. Here is some information that you may need to include:

- Brand/Trademark
- SKU/Product name
- EU company name
- EU company address
- EU company contact details (e.g. email and phone number)

Batch ID/Traceability Number

Market: **European Union**

Batch IDs are used to help trace products to certain production runs (batches) in case of quality or safety issues arise. Batch IDs are often mandatory and may include the following information:

- SKU/Product ID
- Order/Manufacturing date
- Production Facility
- Country

Example

- SKU: ABC01
- Production Location: Shenzhen, China
- Production Date: June 2020

Batch Number: ABC01-062020-SZ1-CN

National Regulations/Standards

Market: **European Union**

Product regulations are largely harmonized among European Union member states. For example, the CE mark is accepted in all EU member states. That said, some national regulations/standards are applied to certain products. Here are some examples:

- LFGB (Germany)
- DIN 4102-1 (Germany)
- M1 (France)

We recommend that you also consult a third-party lab testing company in the same EU member state in which you intend to import, manufacture, or sell your product.

Lab Testing

Third-party lab testing is required to verify compliance with the applicable standards/requirements.

Learn More

National contact points ([Link](#))

Language Requirements

Market: **European Union**

Product labels (e.g. warning labels) and compliance documents (e.g. user instructions and DoC) are generally required to be written in the national member state language in which the product is imported, manufactured, or distributed.

1. The EU blue guide states that the compliance documents and labels must be presented in a language that can be understood by the consumer.

Note: Many companies opt to have their labels and compliance documents translated to the national languages in their primary markets within the EU.

2. Market surveillance authorities can request businesses in other EU member states to provide labels and compliance documents in the national language. This is more likely to happen in case of safety or other product compliance-related issues.

3. Market surveillance authorities can also choose to accept labels and compliance documents written in a language (e.g. English) other than the national language.

 **Learn More**

'Blue Guide' on the implementation of EU product rules ([Link](#))

Important: The PDF is saved in My Reports and can be downloaded at any time. Notice that you must log in on www.compliancegate.com/account to access the My Reports page.

Next Step:

Option A: Read Official Sources: We link to official website sources in this report under **Learn more**, where you must go to find additional information about each topic.

Option B: Request Free Lab Test Quotation: Testing companies can help you verify if your product is compliant and provide a more specific assessment of applicable regulations, standards, and substance tests for your product. Further, testing companies normally stay up to date with new or updated regulations, standards, and other requirements.

[Request a Free Lab Test Quotation](#)

Found an error or is something missing?

Please send an email to info@compliancegate.com if you think the information is outdated, incorrect, or missing in this report.