

# SAFEGUARDS

## CONSUMER GOODS AND RETAIL

TOYS & JUVENILE PRODUCTS, HARDGOODS

NO. 071/15 MAY 2015

## THAILAND ANNOUNCES NEW REQUIREMENTS FOR FEEDING BOTTLES AND LIQUID MILK CONTAINERS

Thailand has recently announced draft rules for the manufacture of feeding bottles and liquid milk containers for infants and young children. The proposed date of entry into force is 180 days after publication in the Official Gazette.

On 17 March 2015, the World Trade Organisation (WTO) circulated [Notification G/SPS/N/Tha/220/add.1](#) to announce that the Ministry of Public Health (MOPH) of Thailand is proposing to adopt the proposal 'Feeding Bottle and Liquid Milk Container for Infants and Young Children'. The proposal, an addendum to Notification [G/SPS/N/Tha/220](#), establishes materials to be used in the manufacture of

- Feeding bottles and their components (lids, teats, rings and seals)
- Single and repeated use liquid milk containers for infants and young children

The proposal also defines specifications for feeding bottles and their components as well as liquid milk containers manufactured from polypropylene (PP), polyethersulfone (PES), polyethylene (PE), natural rubber and synthetic rubber materials. According to the WTO Notification, the date of entry into force will be 180 days after publication in the Official Gazette (1 August 2015).

The relevant legislation and standards cited in WTO Notification G/SPS/N/Tha/220 is

- Regulation (EU) 10/2011 'Food Contact Plastics'
- Directive 93/11/EEC 'Release of N-nitrosamines and N-nitrosatable substances from elastomers or rubber teats and soothers'
- EN 14350-2:2004 'Child use and care articles – drinking equipment'
- The Japan Ministry of Health, Labour and Welfare: Notification No. 370 (1959) revised version No. 416 (2008). Specifications and Standards for Foods, Food Additives etc (Rubber and Nursing utensils)
- Japan Industrial Standard: JIS 9112:1997 'Feeding bottles'

Highlights of the proposal are summarised in

- Table 1. 'Materials for Feeding Bottles and their Components & Liquid Milk Containers for Infants and Children'
- Table 2. 'Specifications for the Migration of Substances from PP, PES and PE



- Materials'.
- Table 3. 'Specifications for the Migration of Substances from Natural Rubber and Synthetic Rubber Materials'

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TABLE 1.

MATERIALS FOR FEEDING BOTTLES AND THEIR COMPONENTS & LIQUID MILK CONTAINERS FOR INFANTS AND CHILDREN		
ENTRY	ARTICLE	MATERIAL TYPE
1	Feeding bottles	PP, PES, borosilicate glass
2	Lids, Rings, Seals	PP, PES
3	Teats	Natural rubber, synthetic rubber
4	Liquid Milk containers for infants and children (repeated use)	PP, PES, borosilicate glass
5	Liquid Milk containers for infants and children (single use)	PP, PE

TABLE 2.

SPECIFICATIONS FOR THE MIGRATION OF SUBSTANCES FROM PP, PES AND PE MATERIALS					
ENTRY	PARAMETER	SUBSTANCE / SIMULANT	MIGRATION LIMIT REQUIREMENT (MG/KG UNLESS OTHERWISE STATED)		
			PP	PES	PE
1	Specific migration of heavy metal	Lead (Pb)	≤ 1.0	≤ 1.0	≤ 1.0
		Barium (Ba)	≤ 1.0	≤ 1.0	≤ 1.0
		Cobalt (Co)	≤ 0.05	≤ 0.05	≤ 0.05
		Copper (Cu)	≤ 5.0	≤ 5.0	≤ 5.0
		Iron (Fe)	≤ 48.0	≤ 48.0	≤ 48.0
		Lithium (Li)	≤ 0.6	≤ 0.6	≤ 0.6
		Manganese (Mn)	≤ 0.6	≤ 0.6	≤ 0.6
		Zinc (Zn)	≤ 25	≤ 25	≤ 25
2	Evaporation residue (Overall migration)	50% ethanol	≤ 60	≤ 60	≤ 60
3	Evaporation residue (Overall migration)	3% acetic acid	≤ 60	≤ 60	≤ 60
4	Specific migration	Bisphenol A	Not Detected (Limit of Detection = 0.25 µg/L)		
5	Specific migration	4,4'-Dichlorodiphenyl Sulfone (DCPS)	---	≤ 0.05	---
6	Specific migration	Bisphenol S (BPS)	---	≤ 0.05	---

TABLE 3.

SPECIFICATIONS FOR THE MIGRATION OF SUBSTANCES FROM NATURAL RUBBER AND SYNTHETIC RUBBER MATERIALS			
ENTRY	SUBSTANCE	REQUIREMENT, UNLESS OTHERWISE STATED, IS MIGRATION LIMIT	
		NATURAL RUBBER	SYNTHETIC RUBBER
1	Formaldehyde	Not Detected (Limit of Detection = 1 mg/dm <sup>3</sup> )	
2	Zinc	≤ 1 mg/dm <sup>3</sup>	≤ 1 mg/dm <sup>3</sup>
3	N-Nitrosamines	≤ 0.01 mg/kg	≤ 0.01 mg/kg
4	N-Nitrosatable Substances	≤ 0.1 mg/kg	≤ 0.1 mg/kg
5	Volatile Compounds Content	---	≤ 0.5 mg/kg (w/w) (Silicone rubber)
6	2-Mercaptobenzothiazole (MBT) release	≤ 8.0 mg/kg (Vulcanise rubber)	---
7	2,6-Bis(1,1-dimethylethyl)-4-methylphenol (BHT)	≤ 30 µg/100 mL or ≤ 60 µg/dm <sup>2</sup>	---
8	Antioxidant 2246	≤ 15 µg/100 mL or ≤ 30 µg/dm <sup>2</sup> (Vulcanise rubber)	---

Throughout our global network of laboratories, we are able to provide a range of services, including analytical testing and consultancy, for food contact feeding bottles and liquid milk containers for infants and children for Thailand and international markets. Please do not hesitate to contact us for further information.



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