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《全球合规快讯》

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Toys and Children products 玩具和儿童产品

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Toys and Children products 玩具和儿童产品

1. EU - Reaches Provisional Agreement on New Toy Safety Regulations

欧盟 - 达成关于新玩具安全法规的临时协议

On April 10, 2025, the European Parliament and Council have reached a provisional agreement on new EU toy safety regulations aimed at enhancing the protection of children's health and development. This initiative addresses emerging challenges, including risks associated with digital toys and the increase in online shopping.

2025 年 4 月 10 日,欧洲议会和理事会达成了一项关于新欧盟玩具安全法规的临时协议,旨在增强对儿童健康和发展的保护。新欧盟玩具安全法规针对于新的挑战,包括数字玩具相关的风险和在线购物的增长。

Key Changes

重点更新

A significant aspect of the new rules is the expansion of the list of prohibited substances in toys. Beyond the existing ban on carcinogenic, mutagenic, or reproductive toxic substances, the legislation now also prohibits chemicals that pose particular risks to children, such as endocrine disruptors, substances harmful to the respiratory system, and chemicals toxic to the skin and other organs. Specifically, the intended use of per- and polyfluorinated alkyl substances (PFASs) and the most dangerous types of bisphenols will be banned.



新法规的一个重要方面是扩大玩具中禁止物质名单。在现有对致癌、诱变或生殖毒性物质的禁令之外,法规现在还禁止对儿童构成特殊风险的化学物质,例如内分泌干扰物、对呼吸系统有害的物质,以及对皮肤和其他器官有毒的化学物质。具体而言,全氟和多氟烷基物质(PFAS)及最危险的双酚类物质将被禁止。

Additionally, allergenic fragrances will be prohibited in toys for children under 36 months and in toys meant to be placed in the mouth. Chemicals regulated under Appendix C of the current Toy safety directive 2009/48/EC which only applies to toys intended for children under 36 months or those intended to be placed in the mouth would be extended to all toys.

此外,过敏性芳香剂将被禁止用于 36 个月以下的儿童玩具以及意图入口的玩具。当前玩具安全指令 2009/48/EC 附录 C 所规定的化学物质仅适用于 36 个月以下的儿童玩具以及意图入口的玩具,新法规将扩展相关要求到所有玩具。

Manufacturers will be required to conduct comprehensive safety assessments before placing toys on the market. These assessments must evaluate potential hazards—chemical, physical, mechanical, and electrical—as well as test for flammability, hygiene, and radioactivity. Importantly, the assessments must consider children's specific vulnerabilities, ensuring, for example, that digital toys do not pose risks to children's mental health.

新法规将要求玩具制造商在将玩具上市前进行全面的安全评估。这些评估必须评估潜在的各种危险 - 化学、物理、机械和电气危险,并测试可燃性、卫生和放射性。重要的是,评估必须考虑儿童特有的脆弱性,确保例如数字玩具不会对儿童的心理健康构成风险。

Digital Product Passport (DPP) Obligations for Online Sellers

线上销售商数字产品护照(DPP) 的义务



The legislation also clarifies the obligations of economic operators, including manufacturers, importers, distributors, and fulfilment service providers. Online marketplaces will be required to design their platforms to allow sellers to display the CE marking, safety warnings, and a link (such as a QR code) to the digital product passport (DPP) before the purchase is completed.

该立法还明确了经济运营者的义务,包括制造商、进口商、分销商和履行服务提供商。网上市场将被要求对其网上销售平台进行设计,以便在消费者完成商品购买前,可以让卖家展示 CE 标志、安全警告以及指向数字产品护照(DPP)的链接(如二维码)。

DDP is a set of data specific to a product that includes the following information:

DPP 是一组针对于产品的特定数据,包括以下信息:

- Unique product identifier产品唯一识别码
- Manufacturer and economic operator details
 制造商和经济运营商的详细信息
- Object of the passport数字产品护照针对的对象
- Compliance references, including the harmonised standards and legislation comply with

合规参考信息,包括所遵循的协调标准和法规

- Certification details
 - 认证信息
- CE Marking
 - CE 标志
- Allergenic fragrance Information



过敏芳香剂信息

- The communication channel联系方式
- A link to the Safety Business Gateway
 指向安全的商业门户网站的链接
- Safety information, warning, instruction for use and the image of the toy may be included

安全信息、警告、使用说明,玩具图片也可能会包括在内

All toys sold in the EU will need to bear a clearly visible DPP, demonstrating compliance with relevant safety rules. Consumers shall be able to access the DDP. The DPP will enhance the traceability of toys, simplify market surveillance and customs checks, and provide consumers with easy access to safety information and warnings. In addition, the DDP shall be available for a period of 10 years.

在欧盟出售的所有玩具都需要附有清晰可见的 DPP,以证明玩具符合相关安全规则。消费者应能够访问该 DPP。DPP 将增强玩具的可追溯性,简化市场监管和海关检查,并为消费者提供便捷的安全信息和警告。此外,DPP 应可使用 10 年。

Closing Loopholes

封堵法规漏洞

Consumers can buy non-compliant toys from third-party sellers based outside the EU via internet. The proposed regulation aims to close these loopholes and bring online sales in line with the same safety requirements. Providers of online marketplaces shall make sure toys comply with the relevant requirements.



消费者可通过互联网从位于欧盟外的第三方卖家那里购买到不合规的玩具。 提议的法规旨在封堵这些法规漏洞,确保线上销售符合相同的安全要求。 线上市场的提供商必须确保玩具符合相关要求。

What's Next

下一步行动

The provisional agreement now needs to be endorsed and formally approved by both the Council and European Parliament.

临时协议需要得到欧盟理事会和欧洲议会的认可和正式批准。

The regulation will then enter into force 20 days following its publication in the EU Official Journal. Member states will then have 54 months to comply with the provisions.

法规将在其发布于欧盟官方公报后的 20 天内生效。法规生效后,成员国将有 54 个月的过渡期来符合相关要求。



Food Contact Products 食品接触产品

2. China - Approved New Substances related to Food Contact Materials and Articles

中国 - 批准食品接触材料及制品相关新物质

The National Health Commission of the People's Republic of China (NHC) has published Notice No.3 of 2025 to approve 3 kinds of substances for food contact materials and articles. This notice has already come into force. The usage conditions of the substance are shown as follows:

中华人民共和国国家卫生健康委员会 (NHC) 发布了 2025 年第 3 号公告, 批准用于食品接触材料和物品的 3 种物质。该公告已生效。相关物质的使 用条件如下:

a) Expansion of the scope of additive used in food contact material and article

食品接触材料及制品用添加剂扩大使用范围

| Items 名称 | CAS No CAS 号 | Scope 使用范围 | Maximum amount to be used 最大使用 量 | Specific Migration Limit 特定迁移 限量 (SML)/ mg/kg | Max Residue 最大残 留量 (QM)/ mg/kg | Note 备注 |
|---------------------|-----------------------|---|--|---|---|---|
| Behenamide 二十二酰胺 | 3061- 75-4 | Plastic: Polybutylene terephthalate (PBT); Polylactic acid (PLA) | 0.4% | _ | _ | PBT and PLA plastic materials and products containing this substance are limited to one-time use; they are stored at room temperature for a long time (t>3d) after being filled at room temperature |



| 塑料:聚对苯二甲酸丁二醇酯(PBT);聚乳酸(PLA) | (including hot filling, pasteurization or other heat treatment). The abovementioned restricted use requirements shall be marked in accordance with the provisions of GB 4806.1. 添加了该物质的 PBT 和 PLA 塑料材料及制品仅限一次性使用;用于室温灌装(包括热灌装、巴氏杀菌或其他热处理)后在室温下长期贮存。上述限制使用要求应按照 GB 4806.1 的规定进行标示。 |
|-----------------------------|--|
|-----------------------------|--|

b) New resin substance used in food contact material and article 食品接触材料及制品用新树脂品种

| Items 名称 | CAS No CAS 号 | Scope 使用范 围 | Maximum amount to be used 最大使用 量 | Specific Migration Limit 特定迁移限量 (SML)/ mg/kg | Max Residue 最大残 留量 (QM)/ mg/kg | Note 备注 |
|--|------------------|--------------------------------------|---|---|---|---|
| 1,4-Benzenedicarboxylic acid, polymer with 2-methyl-1,3-propanediol and tricyclodecanedimethanol 1,4-苯二甲酸与 2-甲基-1,3-丙二醇和4,8-三环[5.2.1.0 2,7]癸烷二甲醇的聚合物 | 1699749- 26-2 | Paint and coating 涂料及 涂层 | 25% (as dry weight of coating film 以涂 膜干重 计) | 7.5 (as 1,4-benzenedicarboxylic acid 以 1,4-苯二甲酸 计) 5 (2-methyl-1,3-propanediol2-甲基- 1,3-丙二醇) 0.05 (4,8-tricyclo [5.2.1.0²'7] decanedimethanol4,8- | _ | Paints and coatings produced with this substance as raw material shall not be used in the production of food contact materials and products for infants and young children, and the use |



| | | | | 三环[5.2.1.0 2,7]癸烷 二甲醇) | temperature shall not exceed 131°C. The above-mentioned restricted use requirements shall be marked in accordance with the provisions of GB 4806.1. 为 的 层 不 罗 食 料 上 用 照 GB 4806.1 标 图 \$\frac{1}{2}\$\$ 是 第 \$\frac{1}{2}\$\$ 是 第 \$\frac{1}{2}\$\$ 是 第 \$\frac{1}{2}\$\$ 是 第 \$\frac{1}{2}\$\$\$ 是 第 \$\frac{1}{2}\$\$\$ 是 第 \$\frac{1}{2}\$\$\$\$ 是 第 \$\frac{1}{2}\$\$\$\$\$\$ 是 第 \$\frac{1}{2}\$ |
|---|------------------|---------------|---------------------------------------|---|---|
| | | | | | 规定进行标 示 |
| Polymer of 1,3- phthalic acid, 1,4- phthalic acid, phthalic anhydride, maleic anhydride and 1,2-propylene glycol, 1,2-ethylene glycol, diethylene glycol, copolymer of styrene (Unsaturated polyester resin UP) | 1253842- 93-1 | Plastic 塑料 | Use as needed 按生产需 要适量使 用 | 5 (as 1,3-benzenedicarboxylic acid 以 1,3-苯二甲酸计) 7.5 (as 1,4-benzenedicarboxylic acid 以 1,4-苯二甲酸计) 30 (as maleic acid 以顺丁烯二酸计) | UP plastic materials and produced with this substance as raw material shall not be used to produce food contact materials and products |



| | | | 1= - |
|-----------------|--|------------------------|--------------------------|
| 1,3-苯二甲酸与 1,4- | | 30 (as ethylene glycol | for infants |
| 苯二甲酸、邻苯二甲 | | 以乙二醇计) | and young |
| 酸酐、顺丁烯二酸 | | | children, the use |
| | | | temperature |
| 酐、1,2-丙二醇、 | | | shall not |
| 1,2-乙二醇和二甘醇 | | | exceed 70°C, |
| 的聚合物与苯乙烯的 | | | and shall not |
| 共聚物(不饱和聚酯 | | | be used to |
| | | | contact food |
| 树脂(UP)) | | | with an |
| | | | ethanol |
| | | | content higher than |
| | | | 20%. S/V |
| | | | shall not |
| | | | exceed 2 |
| | | | dm²/L |
| | | | (kg). The |
| | | | above- |
| | | | mentioned |
| | | | restricted |
| | | | use |
| | | | requirements shall be |
| | | | marked in |
| | | | accordance |
| | | | with the |
| | | | provisions of |
| | | | GB 4806.1. |
| | | | 以该物质为 |
| | | | 原料生产的 |
| | | | 塑料材料及 |
| | | | 制品,使用 |
| | | | 温度不得超 |
| | | | 过 70℃,不 |
| | | | 得用于接触 |
| | | | 乙醇含量超 |
| | | | 过 20%的食 |
| | | | 品,与食品 |
| | | | 接触时 S/V |
| | | | 不得超过 2 |



| | | | dm²/kg; 不 |
|--|--|--|-----------|
| | | | 得用于生产 |
| | | | 婴幼儿专用 |
| | | | 食品接触材 |
| | | | 料及制品。 |
| | | | 上述限制使 |
| | | | 用要求应按 |
| | | | 照 GB |
| | | | 4806.1 规定 |
| | | | 进行标示。 |

3. China - Proposed New Substances related to Food Contact Materials and Articles

中国 - 提议食品接触材料及制品相关新物质

The China National Center for Food Safety Risk Assessment (CFSA) has proposed 2 kinds of substances related to food contact materials and articles. Here are the highlights:

中国国家食品安全风险评估中心(CFSA) 提议了 2 种新的食品接触材料和制品相关物质。以下是提议案的要点:

a) Expansion of the scope of additive used in food contact material and article

食品接触材料及制品用添加剂扩大使用范围

| Items 名称 | CAS No CAS 号 | Scope 使用范围 | Maximum amount to be used | Specific Migration Limit | | Note 备注 |
|-------------|-----------------------|---------------|------------------------------------|--------------------------------|--|------------|
|-------------|-----------------------|---------------|------------------------------------|--------------------------------|--|------------|



| | | | 最大使用量 | 特定迁移 限量 (SML)/ mg/kg | (QM)/ mg/kg | |
|----------------------------------|---------------|---|-------|-------------------------------|----------------|---|
| Barium sulfate 硫酸钡; C.I.颜料白 2 | 7727- 43-7 | Plastic: Polylactic acid (PLA) 塑料:聚乳酸 (PLA) | 30% | | | PLA plastic materials and products containing this substance shall not be used in the production of food contact materials and products for infants and young children. This substance shall comply with the requirements for colorant purity in Appendix A of GB 9685-2016, and the SML of barium element shall comply with the special provisions for metal elements in Appendix C. The abovementioned restricted use requirements shall be marked in accordance with the provisions of GB 4806.1. 添加了该物质的PLA 塑料材料及制品不得用于生产婴幼儿专用食品接触材料及制 |



| | | | | | 品。该物质应符合 GB 9685-2016 附录 A 对着色剂纯度的要求,钡元素 SML应符合附录 C 对金属元素的特别规定。上述限制使用要求应按照GB 4806.1 规定进行标示。PVDF plastic |
|--|-----------|--|----|--|---|
| Pentaerythritoltetrakis(3-(3,5-di-tert-butyl-4-hydroxyphenyl) propionate) 四[3-(3,5-二叔丁基-4-羟基苯基)丙酸]季戊四醇 酯 | 6683-19-8 | Plastic: Polyvinylidene fluoride (PVDF) 塑料:聚偏氟 乙烯 (PVDF) | 3% | | materials and products containing this substance are only allowed to contact food at T≤70°C and t≤24h, and shall not be used to contact oily foods or foods with an ethanol content higher than 50%. The abovementioned restricted use requirements shall be marked in accordance with the provisions of GB 4806.1. 添加了该物质的PVDF 塑料材料及制品仅限在T≤70°C、t≤24h |



| | | | 下接触食品,不 |
|--|--|--|-------------|
| | | | 得用于接触含油 |
| | | | 脂食品和乙醇含 |
| | | | 量高于 50%的食 |
| | | | 品。上述限制使 |
| | | | 用要求应按照 GB |
| | | | 4806.1 的规定进 |
| | | | 行标示。 |

4. Indonesia - Approved Regulations for Glazed Ceramics Eating and Drinking Utensils

印度尼西亚 - 批准关于上釉陶瓷餐饮具的法规

The Ministry of Industry has issued regulations governing the implementation of Indonesian National Standards (SNI) for Glazed Ceramics Eating and Drinking Utensils.

印度尼西亚工业部发布有关实施上釉陶瓷餐饮具印尼国家标准(SNI)的法规。

The Ministry Regulation No 14 of 2025 apply to glazed ceramics eating and drinking utensils. The products shall comply with SNI 7275:2022 for Glazed Ceramics - Eating and Drinking Utensils.

2025 年第 14 号部颁法规适用于上釉陶瓷餐饮具。相关餐饮具产品必须符合关于上釉陶瓷—餐饮具的标准 SNI 7275: 2022。

Products must undergo conformity assessments under Type 5 or Type 1 certification system. Certification verification will be conducted by a product certification body (LSPro), while conformity testing will be carried



out by accredited testing laboratories, either domestic or international. The results of these assessments will be documented in the SNI Certification.

产品必须按照认证体系的第 5 类或第 1 类进行合格评估。产品的认证验证 由产品认证机构(LSPro)进行,而合格测试将由国内或国际的认证实验室 进行。评估结果将记录在 SNI 认证文件中。

All products are required to display the SNI mark and electronic mark. Approval for the use of the SNI mark must be obtained through the Certificate for the Use of the SNI Mark (SNI SPPT) process.

所有产品均需展示 SNI 标志和电子标志。使用 SNI 标志需结果批准,批准必须通过"SNI 标志使用证书(SNI SPPT)"程序获得。

The Ministry Regulation No. 48 of 2018 concerning Mandatory Implementation of the Indonesian National Standard (SNI) for Ceramic Tableware shall be repealed.

关于强制实施陶瓷餐具印尼国家标准(SNI)的第 48 号法规将被废止。

These regulations will come into effect on 25 October 2025. Products manufactured or imported before this date must comply with the regulations by 25 October 2026.

新的法规要求将于 2025 年 10 月 25 日生效。在此日期之前生产或进口的产品必须在 2026 年 10 月 25 日前符合新法规要求。

5. U.S. Washington - Passed SB 5628 to Amend Lead Requirement in Cookware

美国华盛顿州 - 通过 SB 5628 修订炊具中的铅要求



On May 13, 2025, the U.S. State of Washington's Governor signed Bill SB 5628 to amend lead requirement in cookware.

2025 年 5 月 13 日,美国华盛顿州州长签署了 SB 5628 法案,修订炊具中铅含量要求。

On March 28, 2024, Washington approved Bill HB 1551 (codified as 70A.565 RCW) to restrict lead or lead compounds to no more than 5 ppm in cookware or cookware components. And this restriction will become effective on January 1, 2026.

在 2024 年 3 月 28 日,美国华盛顿州通过了 HB 1551 法案(编纂为 70A.565 RCW),限制炊具或炊具组件中的铅或铅化合物含量不得超过 5 ppm,且该限制将于 2026 年 1 月 1 日生效。

According to SB 5628, the scope of the lead restriction has been amended from "Cookware or cookware component" to "Aluminum or brass cookware, aluminum or brass utensils, or aluminum or brass cookware component" and the limit has also been amended to 90 ppm.

根据法规 SB 5628,铅限制的范围已从"炊具或炊具部件"修订为"铝或黄铜炊具,铝或黄铜器具,或铝或黄铜炊具部件",限值也调整至 90 ppm。

Following is a summary of the comparison:

法规对比总结如下:

| Regulation 法规 | ' | Lead Limit & Effective date 铅限值及生效日期 |
|---------------------------------|--------------------------------|--|
| 70A.565 RCW (HB 1551) | Cookware or cookware component | 5 ppm (January 1, 2026) |
| SB 5628 amending 70A.565 RCW | | 90 ppm (January 1, 2026) 10 ppm (January 1, 2028) |



铝或黄铜器具
● Aluminum or brass cookware component
铝或黄铜炊具部件

Note

注

"Aluminum or brass cookware" means the following items when made of brass or aluminum: Pots, pans, kettles, griddles, grills, internal pots for devices such as rice cookers or pressure cookers, and similar vessels or surfaces in or on which food is cooked.

"铝或黄铜炊具" 是指下列由黄铜或铝制成的物品:锅、平底锅、水壶、圆形平底铁锅、烤架、电饭煲或压力锅等设备的内锅,以及类似的用于烹饪食物的容器或表面。

"Aluminum or brass cookware" does not include:

"铝或黄铜炊具"不包括:

- Items with only an internal layer of aluminum or brass that is completely enclosed by stainless steel; or
 - 内部仅有一层铝或黄铜但完全被不锈钢包裹的物品;或
- The body of electronic cooking devices with removable cooking containers, such as slow cookers, rice cookers, and pressure cookers. 带有可拆卸烹饪容器的电子烹饪设备的主体,例如慢炖锅、电饭煲和压力锅。

"Aluminum or brass utensils" means tools made from aluminum or brass such as knives, forks, spoons, spatulas, and similar tools used for preparing, serving, or eating food, unless completely enclosed by stainless steel.



"铝或黄铜器具"是指由铝或黄铜制成的工具,例如刀、叉、勺、铲以及 用于准备、盛放或食用食物的类似工具,除非这些工具完全由不锈钢包裹。

"Aluminum or brass cookware component" means cookware parts made of aluminum or brass such as lids, rivets, fasteners, valves, and vent pipes.

"铝或黄铜炊具部件"是指由铝或黄铜制成的炊具部件,例如盖子、铆钉、 紧固件、阀门和通风管。



Others 其它

6. UK - Approved the Furniture and Furnishings (Fire) (Safety) (Amendment) Regulations 2025

英国-批准家具和室内用品(消防)(安全)(修订案)法规 2025

The UK Government approved The Furniture and Furnishings (Fire) (Safety) (Amendment) Regulations 2025.

英国政府批准了批准家具和室内用品(消防)(安全)(修订案)法规 2025。

This Regulations aimed to amend The Furniture and Furnishings (Fire) (Safety) Regulations 1988. The definition of furniture is amended. It includes:

新法规旨在修订家具和室内用品(消防)(安全)法规1988。新法规修改 了家具的定义,家具包括:

- beds and divans (including the bases and headboards of both)床和沙发床(包括两者的底座和床头板)
- sofa-beds

沙发床

cushions

垫子

mattresses and pillows床垫和枕头

And with the following exclusion:

法规定义的家具不含以下产品:



bedding or floor coverings (including carpets and mats)
 床上用品或地板覆盖物(包括地毯和垫子)

 mattresses intended for use by babies and children, if the length is less than 170 cm and the width is less than 75 cm

供婴儿和儿童使用的床垫,如果其长度小于 170 厘米且宽度小于 75 厘米

 modular mattresses intended for use by babies and children, if the largest component has a length of less than 170 cm and a width of less than 75 cm

供婴儿和儿童使用的模块化床垫,如果其最大的部件长度小于 170 厘 米且宽度小于 75 厘米

- upholstery designed to be used with baby furniture
 专为婴儿家具设计的软装
- play pens

游戏笔

children's car seats儿童汽车安全座椅

play mats

游戏垫

baby changing mats

婴儿换尿布垫

- prams, pushchairs, buggies and strollers
 各类婴儿车(prams, pushchairs, buggies 以及 strollers)
- cots, cribs and cradles, including carry cots, bassinets, Moses baskets, travel cots and bedside sleepers

英式婴儿床、美式婴儿床和婴儿摇篮,包括婴儿床、婴儿摇篮、摩西 提篮、便携式婴儿床和床边婴儿床

cot bumpers



婴儿床缓冲垫

 upholstered bed side barriers intended to be used to prevent a child falling out of bed;

用于防止儿童从床上掉下来的软垫床边护栏

• baby rockers and bouncers

婴儿摇椅(baby rockers and bouncers)

baby nests

婴儿睡袋

baby highchairs and lowchairs

婴儿高脚椅和矮椅

chair-mounted and table-mounted children's booster seats

椅上座椅和桌边座椅

baby walkers

婴儿学步车

The following requirements are deleted:

将删除以下要求:

Labelling requirements of display labels (regulation 10 and Schedule
 6)

显示标签的标签规定(法规条款 10 和附表 6)

 Certain requirements of second-hand furniture (regulation 14 and Schedule 8)

关于二手家具的某些规定(法规条款14和附表8)

The amendments will enter into force on 30 October 2025

修正案将于 2025 年 10 月 30 日生效。



7. EU - Update on Targeted PFAS Analysis EN 17681-1:2025
 欧盟 – 发布更新的 PFAS 分析方法 EN 17681-1:2025

The updated standard EN 17681-1:2025 for targeted PFAS analysis is officially published on April 30, 2025. This revision introduces significant changes particularly in the extraction method, leading to greater detection of PFAS compounds.

针对 PFAS 分析的更新标准 EN 17681-1:2025 已于 2025 年 4 月 30 日正式发布。本次修订在提取方法上进行了重大变更,旨在提高对 PFAS 化合物的检出能力。

Specifically, EN 17681-1:2025 uses alkaline hydrolysis, which breaks covalent bonds in certain side chain fluorinated polymers, resulting in the release and detection of additional PFAS compounds such as fluorotelomer alcohols (FTOHs) compared to previous method EN 17681-1:2022.

具体而言,EN 17681-1:2025 采用碱性水解法,这种方法能破坏某些侧链 氟化聚合物中的共价键,从而释放出并检测出较之前的 EN 17681-1:2022 方法更多的 PFAS 化合物,如氟烷醇化合物(FTOHs)。

What it means for companies

对相关公司的影响

For companies selling products into Europe and currently testing targeted PFAS analysis using EN 17681-1:2022 standard, it is recommended to transition to the updated method to ensure compliance.

对于向欧洲销售产品并且目前使用 EN 17681-1:2022 标准进行 PFAS 物质分析的公司,建议调整为采用更新的方法以确保合规。

For companies and brands selling into the US market only and following total fluorine testing, this update will not affect their testing protocol, as



EN 17681-1:2025 pertains only to targeted PFAS analysis not total fluorine screening.

对于仅向美国市场销售且采用总氟检测的公司和品牌商,此次标准更新不会影响其检测,因为 EN 17681-1: 2025 仅涉及 特定 PFAS 分析,而不是总氟筛查。

Key Differences Between EN 17681-1:2022 and EN 17681-1:2025 EN 17681-1:2022 与 EN 17681-1:2025 之间的主要差异

| Item 项目 | EN 17681-1: 2022 | EN 17681-1: 2025 |
|--------------------------|--|--|
| Sample Preparation | Methanol extraction | Alkaline hydrolysis |
| 样品制备 | 甲醇提取 | 碱性水解 |
| PFAS Targeted 特定 PFAS | Primarily loose bound or extractable PFAS 主要的松散键合 PFAS 物质或 可提取的 PFAS 物质 | Additional PFAS released from side chain fluorinated polymers 从侧链氟化聚合物释放出更多的 PFAS 物质 |
| | Focused on easily extractable PFAS substances 重点关注易被提取的 PFAS 物 质 | Increased detection of degradation products such as FTOHs. Result with new method could be more than 100 times higher than old method. 增强对于降解产物的检测,如 FTOHs。新方法的测试结果可能比旧版本方法高出 100 倍以上。 |



8. US - EPA Further Delays PFAS Reporting Deadline Under TSCA美国 - 美国环保署再次推迟 TSCA PFAS 的申报截止日期

EPA delays PFAS reporting under TSCA to April 2026, citing system development and possible rule changes; public comments accepted until June 2025.

美国环保署将延迟依据 TSCA(有毒物质控制法)规定实施的 PFAS 报告要求,新的报告执行开始日期为 2026 年 4 月,延迟 PFAS 报告的原因是系统开发和可能的规则变更;公众意见征询至 2025 年 6 月。

Introduction

简介

On May 13, 2025, the US Environmental Protection Agency (EPA) published an interim final rule in the Federal Register, officially postponing the start of the PFAS reporting period under the Toxic Substances Control Act (TSCA). This marks the second delay in the implementation of this reporting requirement, originally finalized in October 2023.

2025 年 5 月 13 日,美国环保署(EPA)在联邦公报中发布了一项临时最终规则,正式推迟 PFAS 报告周期的实施时间。这标志着对于这一报告要求的第二次延期,该要求最初确定于 2023 年 10 月。

Why the Delay?

为何延期?

The EPA cited the ongoing development and testing of its electronic reporting system as the reason for the extension. Additionally, the Agency has signaled that it may reopen portions of the rule for further public comment, suggesting that further revisions to reporting requirements may be on the horizon.



美国环保署表示,电子报告系统的持续开发和测试是延期的原因。此外, 环保署表示可能会重新开放部分规则以征求公众意见,这意味着报告要求 可能会进行进一步的修订。

Updated PFAS Reporting Timeline

更新的 PFAS 报告时间表

Reporting Start Date: April 13, 2026

报告开始日期: 2026年4月13日

Reporting End Date: October 13, 2026

报告结束日期: 2026年10月13日

• Extended Deadline: April 13, 2027 (for small manufacturers/importers

reporting solely for articles)

延长期限: 2027 年 4 月 13 日(仅针对小型制造商/进口商需报告的

物品)

Background

背景

The PFAS reporting rule requires manufacturers and importers (including those dealing with articles) to report detailed information about PFAS substances used between 2011 and 2022. The rule is designed to improve the EPA's understanding of the scope and use of PFAS across industries, informing future risk assessments and regulatory actions.

PFAS 报告规则要求制造商和进口商(包括物品处理)报告 2011 年至 2022 年使用的 PFAS 物质的详细信息。该规则旨在改善 EPA 对各行业 PFAS 使用范围和使用情况的了解,从而为未来的风险评估和监管措施提供信息。

Public Comment Opportunity

公众评议



The EPA is currently accepting public comments on the interim final rule. EPA 目前正在接受对临时最终规则的公众意见。

Deadline to Submit Comments: June 12, 2025

提交意见的截止日期: 2025年6月12日



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