

Recycled plastics in toys with foreseeable food contact

TÜV Rheinland LGA Products – Information

March 2025

As part of the circular economy, the use of recycled materials is increasingly promoted by policymakers and expected by consumers. As a result, recycled plastics are also used in a growing number of toys. However, these also include items that can foreseeably come into contact with real food during play, such as accessories for children's kitchens or cookie cutters that are intended for modeling clay but can actually also be used for cookie dough.

The classification of such toy replicas of kitchen utensils as food contact materials was confirmed in [Statement No. 2020/18](#) of the "Arbeitskreis Lebensmittelchemischer Sachverständiger der Länder und des Bundesamtes für Verbraucherschutz und Lebensmittelsicherheit" (ALS).

RECYCLED PLASTICS WITH FOOD CONTACT

While newly manufactured food contact plastics are subject to the requirements of Regulation (EU) No. 10/2011, recycled food contact plastics fall within the scope of [Regulation \(EU\) 2022/1616](#).

A placing on the market of recycled plastic materials and articles is only permitted if, among other things, the following requirements are met:

- Compliance with certain requirements of Regulation (EU) No. 10/2011 (e.g. compositional requirements, specific migration limits, overall migration limit)
- Manufacturing using a recycling technology already classified as suitable (previously only "Post-consumer mechanical PET recycling" or "Recycling from product loops which are in a closed and controlled chain") or a novel technology that has been developed in accordance with the requirements of Regulation (EU) 2022/1616
- Inclusion of certain information in the Union register for recycled plastics with food contact (e.g. decontamination installation, applied authorized recycling process or name of the novel technology used)

Like newly manufactured plastics, recycled plastics must also be accompanied by a declaration of compliance. However, specific templates in accordance with Regulation (EU) 2022/1616 must be used.

RECYCLED PLASTICS IN GENERAL

When using recycled plastics, it is important to note that the quality of a recycle, especially in mechanical recycling, is highly dependent on the quality of the waste used. For example, only input materials that were also suitable for food contact may be used for the manufacturing of recycled plastics with food contact.

The more sensitive the intended use of a recycle (e.g. food contact, long-term skin contact, toys), the more critical potential contaminants must be considered. Risk-oriented testing of relevant substances in the recycled plastic or in the finished article can increase the level of safety. The choice of risk parameters depends, for instance, on the type of plastic and the origin of the waste and should always be made on a case-by-case basis. Trusting cooperation and quality assurance throughout the supply chain are essential for the quality of a recycle.

Do you use recycled plastics in your products and need support with quality assurance? Then get in touch with us!

We offer comprehensive chemical testing for both toys and food contact materials and can assist you in the selection of high-risk contaminants. For example:

- Testing of EN 71 Part 3
- Migration into food simulants (total migration, specific migration)
- Screening of NIAS (Non-Intentionally Added Substances)
- Targeted analysis of bisphenols, phthalates, flame retardants, PFAS, ...

For further technical information, please contact:

TÜV Rheinland LGA Products GmbH
Technical Competence Center Toys

Silja Theiler
Silja.Theiler@de.tuv.com

Tillystraße 2
90431 Nuremberg
Germany

Disclaimer

This newsletter only contains information of a general nature without specific reference to particular natural or legal persons, objects or circumstances. This newsletter is not to be understood as legal advice and is in no way a substitute for such advice. TÜV Rheinland LGA Products GmbH (TRLPG) cannot guarantee that all formulations correspond exactly to the respective official versions. TRLPG makes every effort to ensure that the information provided is correct and up-to-date. Nevertheless, errors and ambiguities cannot be completely ruled out. TRLPG therefore assumes no liability for the topicality, correctness, completeness or quality of the information provided. For the official text, please refer to the national or EU Official Journal.

Liability claims against TRLPG relating to material or non-material damage caused by the use or non-use of the information provided or by the use of incorrect or incomplete information are fundamentally excluded.