



# Determination of melamine and formaldehyde (FA) in food contact material migration solutions.

*FCM-23/01 Proficiency Test Report*



268-PT

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## **Abstract**

The European Union Reference Laboratory for Food Contact Materials (EURL-FCM) organised a proficiency testing round (FCM-23/01) for the determination of the mass fraction of melamine and formaldehyde in food simulant B solutions, in support to Commission Regulation (EU) 2020/1245. This proficiency testing exercise was open to EU National Reference Laboratories (NRLs) and Official Control Laboratories (OCLs). The EURL dispatched two well-characterised test items for analysis, namely (i) a food simulant solution B spiked with the specified substances, and (ii) four bamboo/melamine mugs for the migration tests. Twenty-five NRLs from 24 countries, and 18 OCLs (from Belgium, Germany, Italy and Spain) reported results. Analysing the spiked solution proved relatively straightforward, with over 95 % of the participants reporting satisfactory results. However, the compliance assessment of the mugs was more challenging; only 6 laboratories assessed correctly the compliance of test item 2 for both melamine and formaldehyde in line with the observations of the EURL, while several others presented compliance statements in line with the EURL but inconsistent with their own experimental results. This report provides a detailed discussion about the outcomes of this proficiency testing exercise.

## Acknowledgements

The forty-three laboratories listed hereafter are kindly acknowledged for their participation in the PT.

Organisation	Country
AGES, Gebrauchsgegenstände	Austria
Federal agency for the safety of the food chain (AFSCA-FAVV)	Belgium
Sciensano	Belgium
National Center of Public Health and Analyses (NCPHA)	Bulgaria
Croatian Institute of Public Health (HZJZ)	Croatia
State General Laboratory (SGL)	Cyprus
National Institute of Public Health (SZÚ)	Czech Republic
Technical University of Denmark (TUD)	Denmark
Danish Veterinary and Food Administration (DVFA)	Denmark
Finnish Customs (TULLI)	Finland
Laboratoire National de Metrologie et d'essais (LNE)	France
Service Commun des Laboratoires (SCL), Laboratoire de Bordeaux	France
Chemisches und Veterinäruntersuchungsamt Münsterland-Emscher-Lippe (CVUA-MEL)	Germany
Thüringer Landesamt für Verbraucherschutz (TLV)	Germany
Landesbetrieb Hessisches Landeslabor (LHL), Hessen	Germany
German Federal Institute for Risk Assessment (BfR)	Germany
Chemisches- und Veterinäruntersuchungsamt (CVUA) Stuttgart (chemical & veterinary office)	Germany
LAVES, Institut für Bedarfsgegenstände Lüneburg (IfB) Lüneburg	Germany
Landeslabor Schleswig-Holstein (LSH)	Germany
General Chemical State Laboratory (GCSL)	Greece
National Food Chain Safety Office (NEBIH), Food Chain Safety Laboratory Directorate	Hungary
The Public Analyst's Laboratory	Ireland
Agenzia di Tutela della Salute (ATS)-Milano	Italy
Istituto Zooprofilattico Sperimentale della Lombardia e dell'Emilia Romagna (IZSLER), Chemical Department Bologna	Italy
Agenzia Regionale per la Protezione Ambientale delle Marche (ARPAM), Laboratorio Chimico	Italy
USL TOSCANA CENTRO, LABORATORIO DI SANITA PUBBLICA	Italy
Agenzia regionale per la protezione dell'ambiente Friuli Venezia Giulia (ARPA FVG), Laboratorio di Udine	Italy
Agenzia di Tutela della Salute (ATS) Insubria, Laboratorio di Prevenzione	Italy
Istituto Superiore di Sanità (ISS), Dipartimento Ambiente e salute (DAMSA)	Italy
National Public Health Surveillance Laboratory (NPHSL)	Lithuania
Laboratoire National de Santé (LNS)	Luxembourg
Netherlands Food and Consumer Product Safety Authority (NVWA) Product Safety Laboratory	Netherlands
Escola Superior de Biotecnologia - Universidade Católica Portuguesa	Portugal
National Institute of Public Health (INSP)	Romania
Regional Public Health Authority	Slovakia
National Laboratory of Health, Environment and Food (NLZOH)	Slovenia
Centro Analítico de Inspección y Control de Calidad de Comercio Exterior. SOIVRE	Spain
Centro Nacional Alimentacion (CNA)	Spain
Laboratorio de Salud Pública – Madrid Salud	Spain
Laboratorio de Salud Pública de Alicante	Spain
AINIA Centro Tecnológico	Spain
Swedish Food Agency	Sweden
Official Food Control Authority of the Canton of Zürich	Switzerland

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This report has been authorised by Ursula Vincent, Head of Unit JRC F.5.

## Executive summary

The European Union Reference Laboratory for Food contact materials (EURL-FCM) organised a proficiency test (FCM-23/01) for the determination of melamine and formaldehyde to support the Commission Regulation (EU) 2020/1245 amending Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food. This proficiency test was open to National Reference Laboratories (NRLs) and Official Control Laboratories (OCLs).

Two test items were prepared and dispatched to participants for analysis. Test item 1 consisted of a solution of melamine and formaldehyde in food simulant B (acetic acid 3 % w/v in water), while test item 2 consisted of four bamboo/melamine mugs. The homogeneity and stability of both test items were evaluated by the EURL while the assigned values for test item 1 were derived from the gravimetric preparation of the solution. No assigned values were needed for test item 2.

Twenty-five NRLs from 24 countries and 18 OCLs registered to this PT round and reported results. The results for test item 1 were rated using z and zeta ( $\zeta$ ) scores in accordance with ISO 13528:2022. Relative standard deviations for proficiency assessment ( $\sigma_{pt}$ ) were set to 15 % of the respective assigned values for the two analytes.

More than 95 % of the participating laboratories performed satisfactorily (according to the z score) for the analysis of melamine and formaldehyde in the solution. These results confirm the competence of the participants in effectively monitoring melamine and formaldehyde in food simulant B.

The assessment of participants' compliance statements for test item 2 presented significant difficulties. Minor variations in migration test conditions, though within the tolerable range had a significant impact on the test results. Only 28 % (12 out of 43) of the laboratories accurately assessed the compliance and the stability of migration for formaldehyde in test item 2, in line with the EURL conclusion. The assessment of melamine stability of migration and compliance with the specific migration limit (SML) for test item 2 emerged as notably arduous with only 18 % (7 out of 39) of the laboratories correctly assessing compliance and stability for melamine in test item 2, aligning with the EURL conclusions.

In conclusion, assessing the compliance of melamine-bamboo mugs remains challenging and requires further investigations.

## 1 Introduction

The European Union Reference Laboratory for Food Contact Materials (EURL-FCM), hosted by the Joint Research Centre of the European Commission, organised a proficiency test (PT) for the determination of melamine and formaldehyde in food simulant B solution and their migration from melamine-bamboo ware to support the Commission Regulation (EU) 2020/1245 [1].

This PT was agreed upon with the Directorate General for Health and Food Safety (DG SANTE) as part of the EURL-FCM annual work programme 2023, thus complying with the mandate set in Regulation (EU) 2017/625 [2]. The PT was open to National Reference Laboratories (NRLs) and to Official Control Laboratories (OCLs) willing to participate.

This report summarises the outcome of the PT.

## 2 Scope

The present PT aims to assess the performance of NRLs and OCLs in the determination of melamine and formaldehyde in food simulant B and their migration from melamine-bamboo ware. The PT was mandatory for the NRLs active in the field of FCM, and open to OCLs. Participants were also asked to assess the compliance of the melamine-bamboo mugs (test item 2) with the specifications outlined in Regulations (EU) 2020/1245 [1].

This PT, organised in line with ISO 17043:2023 [3], is identified as "FCM-23/01".

## 3 Set up of the exercise

### 3.1 Quality assurance

The JRC Unit hosting the EURL-FCM is accredited according to:



- ISO/IEC 17025:2017 [4] (certificate number BELAC 268-TEST)
- ISO/IEC 17043:2023 [3] (certificate number: BELAC 268-PT, proficiency test provider)

The reported results were evaluated following the relevant administrative and logistic procedures.

### 3.2 Confidentiality

The procedures used for the organisation of PTs guarantee that the identity of the participants and the information provided by them is treated as confidential. The participants in this PT received a unique laboratory code used throughout this report. However, the laboratory codes of NRLs appointed in line with Regulation (EU) 2017/625 [3] may be disclosed to DG SANTE upon request for the purpose of an assessment of their (long-term) performance. Similarly, laboratory codes of appointed OCLs may be disclosed to their respective NRL upon request.

### 3.3 Time frame

The organisation of the PT FCM-23/01 exercise was announced during the EURL-FCM plenary meeting on October 12, 2022, and an additional email was sent in May 2023 (Annex 1a). An invitation letter was then sent to NRLs and OCLs on May 17, 2023 (Annex 1b). The registration deadline was set to June 12, 2023. Samples were sent to participants on June 21, 2023. The deadline for reporting of results was first set to August 25, 2023 (Annex 2), and later extended until September 6, 2023 upon request of some participants.

### 3.4 Distribution

Each participant received:

- One vial containing 20 mL of food simulant B (acetic acid 3 % w/v) solution spiked with melamine and formaldehyde (test item 1); and
- Four melamine-bamboo mugs (test item 2) for migration test of melamine and formaldehyde in food simulant B.

Samples were sent under normal transport conditions at ambient temperature.

### 3.5 Instructions to participants

Detailed instructions were given to participants in the "Instruction letter" (Annex 2). Participants were requested to inspect the vial and the mugs for damages upon arrival. They were also instructed to store test item 1 in the refrigerator at  $4\text{ °C} \pm 2\text{ °C}$  in the dark upon reception and until analysis, to minimise the risk of contamination and ensure stability. Analyses were to be conducted soon after reception.

For test item 1, participants were requested to determine the "**mass fraction of melamine and formaldehyde in the food simulant B solution**" and subsequently report the results and the corresponding expanded measurement uncertainties **in  $\text{mg kg}^{-1}$** . This calculation was to be performed assuming a density of  $1\text{ kg m}^{-3}$  for the food simulant B solution. Results were to be reported using the same number of significant figures normally reported to customers.

Similarly, participants were requested:

- to treat test item 2 as routine samples;
- to perform three consecutive migration experiments ( $m_1$ ,  $m_2$  and  $m_3$ ) at  $70 \pm 2\text{ °C}$  for  $120 \pm 5$  minutes, on three different mugs (MUG1, MUG2 and MUG3), following their routine procedures;
- to determine the "mass fraction of melamine and formaldehyde" migrated from the mugs into the food simulant B solution, and to assess the compliance of the mugs with the specifications outlined in Commission Regulation (EU) 2020/1245 [1].

Participants received an individual code to access the on-line reporting interface, to report their measurement results and to complete the related questionnaire. The latter was designed to gather additional information related to measurements and laboratories (Annex 3).

Random laboratory codes were attributed and individually communicated to participants by e-mail.

## 4 Test items

### 4.1 Preparation

Test item 1 consisted of a food simulant B solution spiked with melamine and formaldehyde.

Formaldehyde stock solution (LRAD2648 CRM 998 mg/L) was purchased from Sigma Aldrich, while the melamine stock solution was prepared by weighing ca. 50 mg of pure standard (Sigma Aldrich MKCP8204) in 100 mL volumetric flasks and filled to the mark with water. The bulk solution of test item 1 was prepared by transferring ca. 25 mL of formaldehyde and 10 mL of melamine stock solutions into a 2 L volumetric flask, subsequently filled to the mark with food simulant B solution. Individual test items were prepared by transferring 20 mL of the bulk solution into 22 mL glass vials, resulting in a total of 100 vials produced. Each vial was uniquely identified with a number and the PT identifier. The mass fractions of formaldehyde and melamine in both solutions were determined as described in Section 5.1.

A total of 250 melamine/bamboo mugs were purchased from a local market. Each participant received a set of four mugs (test item 2) to conduct the migration tests.

### 4.2 Homogeneity and stability

Measurements for the homogeneity and stability studies and the statistical treatment of data were performed by the EURL-FCM.

The melamine in food simulant B (acetic acid 3 % w/v) solution was determined by high performance liquid chromatography (HPLC) using UV detection at 220 nm. The formaldehyde analysis involved mixing food simulant B with 2,4-dinitrophenylhydrazine (DNPH) to form the corresponding hydrazone, followed by HPLC-UV detection at 360 nm.

Homogeneity assessment was performed after the preparation of the test items and before distribution to participants.

For test item 1, ten vials were randomly selected and analysed in duplicate. Results were evaluated according to ISO 13528:2022 [5]. The solution proved to be adequately homogeneous for the investigated analytes (Annex 4.A). The contribution from homogeneity ( $u_{hom}$ ) to the standard uncertainty of the assigned value ( $u(x_{pt})$ ) was calculated using SoftCRM [6].

The homogeneity test played a critical role for test item 2, due to the difficulty in finding a large batch of commercial mugs that was sufficiently homogeneous. The homogeneity study was conducted for three consecutive migrations (m1, m2 and m3) at  $70 \pm 2$  °C for  $120 \pm 5$  min, using 10 randomly selected mugs, and focusing on both melamine and formaldehyde. Due to the "destructive" nature of the test, no replicate analyses were feasible. Sufficient homogeneity was proven based on the reasonable relative standard deviations (below 10 %) observed in the migrations and the analyses of the selected mugs (Annex 4.B).

Stability assessment was conducted at two points: (i) immediately after the preparation of the test items (time 0) and (ii) after the reporting of results.

Three additional samples of the solution (test item 1) were analysed in duplicate after the reporting deadline. Results were then compared to those obtained from

the homogeneity study. This stability study confirmed that test item 1 was adequately stable (i) at room temperature (20°C) over the entire PT period (13 weeks, from the value assignment until the deadline for reporting results); (ii) for 1 week at 40 °C (simulating extreme conditions which may occur during transport); and (iii) at the reference temperature of 4 °C. Hence, the uncertainty contribution due to stability was set to zero ( $u_{st} = 0$ ) for all the investigated analytes (Annex 4.C).

No stability study was conducted for test item 2, as the mugs were assumed to be stable with the time and thus also the migration of melamine and formaldehyde from them.

## 5 Assigned values and corresponding uncertainties

### 5.1 Assigned values

The assigned values ( $x_{pt}$ ) for melamine and formaldehyde in test item 1 were derived from formulation (Table 1).

### 5.2 Associated uncertainties

The associated standard uncertainties of the assigned values ( $u(x_{pt})$ ) for melamine and formaldehyde in test item 1 were calculated following the law of uncertainty propagation, combining the standard measurement uncertainty of the characterisation ( $u_{char}$ ) with the standard uncertainty contributions from homogeneity ( $u_{hom}$ ) and stability ( $u_{st}$ ), in compliance with ISO 13528:2022 [5]:

$$u(x_{pt}) = \sqrt{u_{char}^2 + u_{hom}^2 + u_{st}^2} \quad \text{Eq. 1}$$

The uncertainty  $u_{char}$  was estimated from the formulation following the law of uncertainty propagation, combining quadratically the standard deviations of the input quantities as recommended by the Guide of expression of uncertainty in measurement (GUM) [7].

### 5.3 Metrological traceability of the assigned value

The assigned values were obtained by gravimetric preparation from Sigma-Aldrich's standards. The SI-traceable calibration of balances and a thorough control of the weighing procedure ensure traceability of the weighing itself.

### 5.4 Standard deviation for proficiency assessment, $\sigma_{pt}$

The relative standard deviations for proficiency assessment ( $\sigma_{pt,rel}$ ) of melamine and formaldehyde in test item 1 were set to 15 % of the respective assigned values, based on expert judgment (Table 1).

**Table 1:** Assigned values ( $x_{pt}$ ) and standard deviation for the PT assessment ( $\sigma_{pt}$ ) for melamine and formaldehyde in test item 1 (T1). All values (excluding last column) are expressed in mg kg<sup>-1</sup>.

Measurand	$x_{pt}$	$u_{char}$	$u_{hom}$	$u(x_{pt}) k = 1$	$\sigma_{pt} (\sigma_{pt,rel})$	$u(x_{pt})/\sigma_{pt}$
Melamine in T1	<b>2.528</b>	0.0058	0.0037	<b>0.0069</b>	0.379 (15 %)	0.02
Formaldehyde in T1	<b>12.48</b>	0.21	0.01	<b>0.21</b>	1.87 (15 %)	0.11

## 5.5 Compliance statement for test item 2

Commission Regulation (EU) 2020/1245 introduced the requirement for a plastic repeated-use article to be stable during three consecutive migrations. According to the note on "Options for checking compliance of plastic food contact material articles for repeated use - An EURL-FCM harmonised approach (Ares(2022)8554518)" sent by the EURL to DG SANTE, the sample shall be considered non-compliant for the migration of a substance considering the standard measurement uncertainty if:

$$m_3 > SML, \text{ or}$$

$$m_2 > m_1 \text{ OR } m_3 > m_2$$

These criteria shall be evaluated as follows:

Crit.1: <b>IF</b> $(m_3 - SML) / [u(m_3)] > 1.64$	<b>THEN</b> $m_3 > SML$
Crit.2: <b>IF</b> $(m_j - m_i) / [u(m_j) + u(m_i)] > 1.64$	<b>THEN</b> $m_j > m_i$

For a harmonised approach the standard measurement uncertainty (u) is calculated by the modified Horwitz method.

The plastic mugs investigated are designed for repeated-use with hot-fill applications. As per Regulation (EU) No 10/2011 [10], the migration of substances from the mugs should be tested at 70 °C for 2 hours. Furthermore, the normative Annex C of the EN 13130-1:2004 standard [11] defines tolerance ranges for both contact temperature and time, of 70 ± 2 °C and 120 ± 5 min, respectively.

In a series of three consecutive migrations (m1, m2 and m3) from the same mug, performed by the EURL-FCM, a repeatable temperature profile (profile 1) was observed in the food simulant B (Annex 7), falling within the specified tolerance limits. This consistency ensures the accuracy of the migration results.

Compliance with the SML and the stability of test item 2 were assessed based on the homogeneity results (Annex 4B). The third migration of formaldehyde into food simulant B was significantly below the SML of 15 mg kg<sup>-1</sup>, and the consistency observed across the three migrated levels confirmed the stability of the mugs (Annex 10A). Consequently, test item 2 is considered to be **compliant for formaldehyde**. On the contrary, the third migration of melamine into food simulant B exceeded significantly the SML of 2.5 mg kg<sup>-1</sup>. Despite exhibiting stable behaviour throughout the three migrations (Annex 9A), the test item 2 is considered **non-compliant for melamine**.

## 6 Evaluation of results

### 6.1 Scores and evaluation criteria

The individual laboratory performance was expressed in terms of z and ζ scores according to ISO 13528:2022 [5]:

$$z = \frac{x_i - x_{pt}}{\sigma_{pt}} \quad \text{Eq. 2}$$

$$\zeta = \frac{x_i - x_{pt}}{\sqrt{u^2(x_i) + u^2(x_{pt})}} \quad \text{Eq. 3}$$

Where:  $x_i$  is the measurement result reported by a participant;  
 $u(x_i)$  is the standard measurement uncertainty reported by a participant;  
 $x_{pt}$  is the assigned value;  
 $u(x_{pt})$  is the standard measurement uncertainty of the assigned value;  
 $\sigma_{pt}$  is the standard deviation for proficiency test assessment.

The interpretation of the z and  $\zeta$  scores is done according ISO 13528:2022 [5]:

$ \text{score}  \leq 2$	satisfactory performance	(green in Annexes 5-6)
$2 <  \text{score}  < 3$	questionable performance	(yellow in Annexes 5-6)
$ \text{score}  \geq 3$	unsatisfactory performance	(red in Annexes 5-6)

The z scores compare the participant's deviation from the assigned value with the standard deviation for proficiency test assessment ( $\sigma_{pt}$ ) used as common quality criterion.

The  $\zeta$  scores state whether the laboratory's result agrees with the assigned value within the respective uncertainty. The denominator is the combined uncertainty of the assigned value  $u(x_{pt})$  and the measurement uncertainty as stated by the laboratory  $u(x_i)$ . The  $\zeta$  score includes all parts of a measurement result, namely the expected value (assigned value), its measurement uncertainty in the unit of the result as well as the uncertainty of the reported values. An unsatisfactory  $\zeta$  score can either be caused by an inappropriate estimation of the concentration, or of its measurement uncertainty, or both.

The standard measurement uncertainty of the laboratory  $u(x_i)$  was obtained by dividing the reported expanded measurement uncertainty by the reported coverage factor,  $k$ . When no uncertainty was reported, it was set to zero ( $u(x_i) = 0$ ) by the PT coordinator. When  $k$  was not specified, the reported expanded measurement uncertainty was considered by the PT coordinator as the half-width of a rectangular distribution;  $u(x_i)$  was then calculated by dividing this half-width by  $\sqrt{3}$ , as recommended by Eurachem [8].

Uncertainty estimation is not trivial, therefore an additional assessment was provided to each laboratory reporting measurement uncertainty, indicating how reasonable their measurement uncertainty estimation has been. The relative standard measurement uncertainty was calculated based on the absolute values of the assigned values [ $U_{rel}(x_{pt}) = 100 * (u(x_{pt})/x_{pt})$ ] and of the reported values [ $U_{rel}(x_i) = 100 * (u(x_i)/x_i)$ ].

The relative standard measurement uncertainty from the laboratory  $U_{rel}(x_i)$  is most likely to fall in a range between a minimum and a maximum allowed uncertainty (case "a":  $U_{min,rel} \leq U_{rel}(x_i) \leq U_{max,rel}$ ).  $U_{min,rel}$  is set to the standard uncertainties of the assigned values  $U_{rel}(x_{pt})$ . It is unlikely that a laboratory carrying out the analysis on a routine basis would determine the measurand with a smaller measurement uncertainty than the expert laboratories chosen to establish the assigned value (ISO 13528:2022 §7.6) or, if applicable, by formulation (ISO 13528:2022 §7.3) or than the certified measurement uncertainty associated with a certified reference material property value (ISO 13528:2022 §7.4).  $U_{max,rel}$  is set to the standard deviation accepted for the PT assessment,  $\sigma_{pt}$  (expressed as a percentage of the assigned value). Consequently, case "a" becomes:  $U_{rel}(x_{pt}) \leq U_{rel}(x_i) \leq \sigma_{pt, \%}$ .

If  $U_{rel}(x_i)$  is smaller than  $U_{rel}(x_{pt})$  (case "b") the laboratory may have underestimated its measurement uncertainty. Such a statement has to be taken with care as each laboratory reported only measurement uncertainty, whereas the measurement uncertainty associated with the assigned value also includes contributions for homogeneity and stability of the test item. If those are large, relative measurement uncertainties smaller than  $U_{rel}(x_{pt})$  are possible and plausible.

If  $U_{rel}(x_i)$  is larger than  $\sigma_{pt,\%}$  (case "c") the laboratory may have overestimated its measurement uncertainty. An evaluation of this statement can be made when looking at the difference between the reported value and the assigned value: if the difference is smaller than the expanded uncertainty  $U(x_{pt})$  then overestimation is likely. If the difference is larger but  $x_i$  agrees with  $x_{pt}$  within their respective expanded measurement uncertainties, then the measurement uncertainty is properly assessed resulting in a satisfactory performance expressed as a  $\zeta$  score, though the corresponding performance, expressed as a z score, may be questionable or unsatisfactory.

It should be pointed out that " $U_{max,rel}$ " is a normative criterion when set by legislation.

## 6.2 General observations

Twenty-five NRLs from 24 Member States and Switzerland, and twenty OCLs (from Germany, Italy, Spain and Belgium) registered to the exercise. Two OCLs did not report results. The remaining 43 laboratories, represent most of the EU Member States (except Poland, Estonia and Malta). In addition, three NRLs and 2 OCLs reported results only for formaldehyde.

## 6.3 Laboratory results and scorings

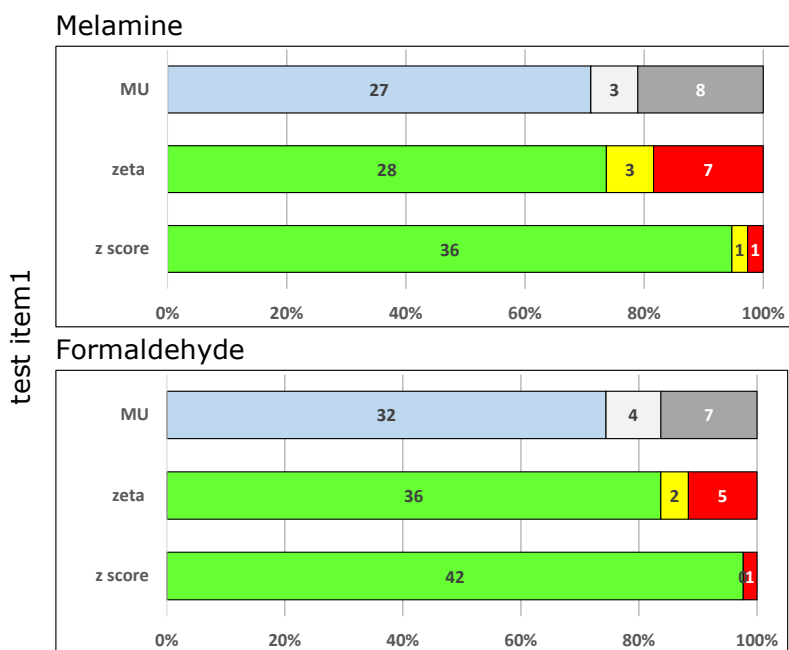
### 6.3.1 Performances

The laboratory performance for melamine and formaldehyde in test item 1 was evaluated using z and  $\zeta$  (zeta) scores

Annexes 5 and 6 present the reported results as tables and graphs for both measurands. NRLs and OCLs are denoted as LNxx and LOxx, respectively.

Figure 1 summarises the performance scores obtained, with a total of 38 and 43 results scored for melamine and formaldehyde, respectively. Overall, a very good performance ("satisfactory" according to the z score) is observed for 95 % and 98 % of the results reported for melamine and formaldehyde, respectively. Similarly, the evaluation of the laboratory performance, according to the zeta scores, was satisfactory for over 70 % of the reported results. Two unsatisfactory (blunder) results were reported, one for melamine and one for formaldehyde, likely attributable to incorrect dilution factors used: a factor of 100 for LN19 for melamine, and a factor of 10 for LN15 for formaldehyde.

The robust statistics, calculated using the Excel add-in developed by the Statistical Subcommittee of the Analytical Methods Committee of the UK Royal Society of Chemistry [9], yielded the following results:  $2.47 \pm 0.13$  (5 %) mg kg<sup>-1</sup> for melamine and  $12.2 \pm 0.7$  (6 %) mg kg<sup>-1</sup> for formaldehyde. These values are in good agreement with the assigned values by the EURL and presented in Table 1. The low robust standard deviations observed suggest that the value of  $\sigma_{pt}$  (set to 15 % in this PT) could be decreased for future PT assessments.



**Figure 1:**

Overview of laboratory performance per measurand according to z and ζ scores for formaldehyde and melamine in test item 1. Corresponding number of laboratories are included in the graph.

Satisfactory, questionable and unsatisfactory performances (z and zeta scores) are indicated in green, yellow and red, respectively.

Realistic, underestimated and overestimated measurement uncertainties (a,b,c) are indicated in blue, white and grey, respectively.

### 6.3.2. Truncated values

Laboratory LN15 reported an unrealistic truncated value ( $< 1.86 \text{ mg kg}^{-1}$ ) for melamine in test item 1, while the assigned value for this measurand is  $2.528 \text{ mg kg}^{-1}$  (Table 1).

### 6.3.3. Measurement uncertainties

The majority of laboratories reporting quantitative results provided expanded measurement uncertainties (MU) and coverage factors. However, two NRLs and two OCLs did not report MU for melamine, and one NRL and one OCL did not provide them for formaldehyde. Additionally, three participants did not report the coverage factor applied. Nevertheless, Figure 1 shows that over 70 % of the participants provided realistic evaluation of the measurement uncertainty.

### 6.3.4. Test item 2 compliance statement evaluation

Participants were requested to perform three consecutive migration experiments (m1, m2 and m3) at  $70 \pm 2 \text{ }^\circ\text{C}$  for  $120 \pm 5$  minutes, on three different mugs (MUG1, MUG2 and MUG3 – test item 2), following their routine procedures. They were then requested to determine the “mass fraction of melamine and formaldehyde” migrated from the mugs into the food simulant B solution, and to assess the compliance of the mugs with the specifications outlined in Commission Regulation (EU) 2020/1245 [1]. In addition, participants were requested to provide (i) information about their migration procedures in the questionnaire, and (ii) the temperature profile measured in the food simulant.

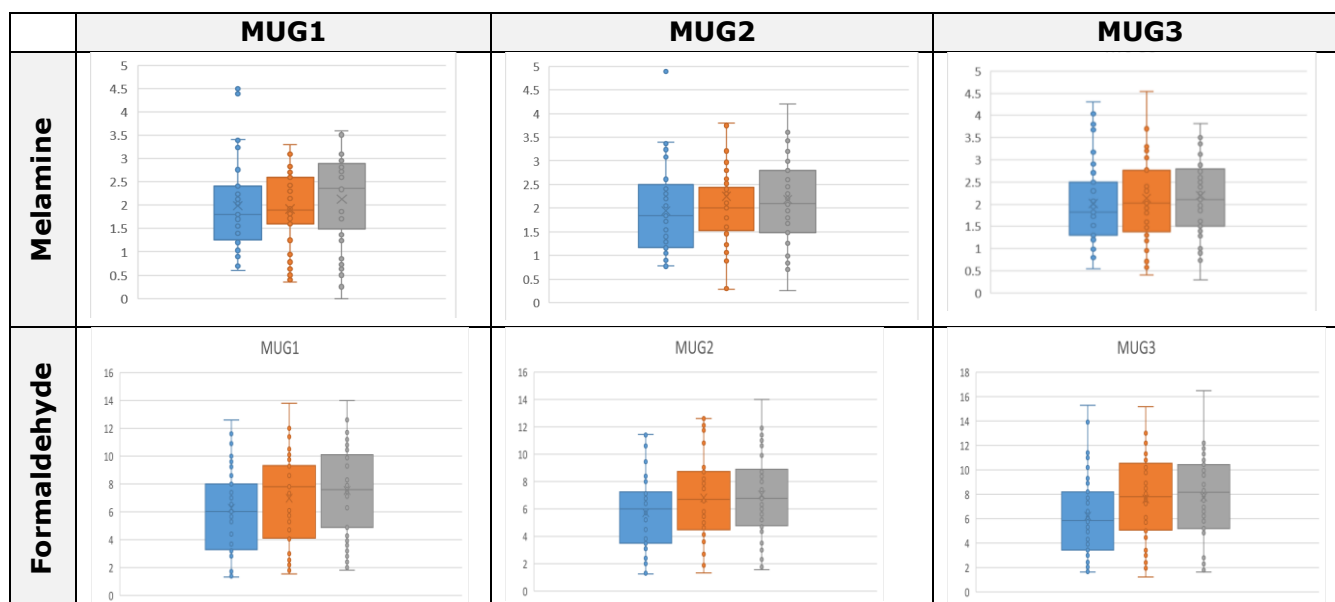
The final compliance statements should align with the participants' data and conform to the requirements outlined in Commission Regulation (EU) 2020/1245, specifically Section 2.1.6 of Annex V, which prescribes compliance rules for "Repeated use materials and articles." According to these requirements, evaluating the compliance of a repeated-use article involves two key assessments: (i) verifying compliance with the Specific Migration Limits (SML), and (ii) assessing the stability of the article by comparing results from two consecutive migrations ((m1,m2) and (m2,m3)).

Most of the laboratories submitted the following information for melamine and formaldehyde in three different mugs (MUG1, MUG2, MUG3):

- Results from three migration tests (m1, m2, m3);
- Associated expanded uncertainty for the 1<sup>st</sup> migration test, U(m1)\*;
- Corresponding coverage factor used, k
- Compliance statement for test item 2; and
- Temperature profile used for the migration tests.

(\*) Note: Although laboratories provided the expanded uncertainty for the first migration only, the EURL calculated the standard measurement uncertainty by dividing the expanded uncertainty by the coverage factor ( $u(m1) = U(m1)/k$ ), and the corresponding relative standard deviation was calculated by dividing the standard measurement uncertainty by the migration value ( $RSD = u(m1)/m1$ ), which was assumed to be constant for similar migration levels ( $RSD(m1) = RSD(m2) = RSD(m3)$ ).

The analytical results reported by the participants for three consecutive migration tests (m1, m2, m3) of melamine and formaldehyde from test items 2 are presented in Annexes 11 and 12. A summary overview is presented in Figure 2, grouped by mugs.



**Figure 2:** Box plots of the melamine and formaldehyde results reported by the participants for the three consecutive migrations (m<sub>1</sub>, blue; m<sub>2</sub>, orange; m<sub>3</sub>, grey) from three mugs (MUG 1-3), (migration in mg kg<sup>-1</sup>)

The EURL performed the following evaluation of the participants' data:

- Scrutinising all temperature profiles and categorised them as Satisfactory (S), Questionable (Q) and Unsatisfactory (U), as indicated in Table 2 and the last column of Annexes 11-12;
- Comparing each third migration result with the relevant SML (Example 1) and flagging values higher than SML with a pink cell in Annexes 11-12; and
- Examining consecutive migrations (m2, m1) and (m3,m2) (Example 2) to identify increases in migrated levels, and flagging any such increase with the symbol "↗".

These calculations were performed for all the reported results.

<b>Example 1: Is a migrated level (m3) above SML? Crit.1</b>	
<p><b>Melamine</b> (Annex 11)  <b>SML</b> = 2.5 mg kg<sup>-1</sup>  <b>LN01, MUG3</b></p> <p>m1 = 2.59 mg kg<sup>-1</sup>            U(m1) = 0.259 mg kg<sup>-1</sup>; k = 1.73            u(m1) = 0.259 / 1.73 = 0.15 mg kg<sup>-1</sup>            RSu(m1)=RSu(m3)= 0.15 / 2.59 = 5.8 %</p> <p><b>m3</b> = 2.9 mg kg<sup>-1</sup>            u(m3) = 0.058 * 2.9 = 0.17  <b>Crit.1:</b> (2.9 - 2.5) / 0.17 = 2.39 &gt; 1.64                      → <b>m3 &gt; SML</b></p>	

<b>Example 2: Are the migrated levels stable?</b>	
<p><b>Melamine</b> (Annex 11)  <b>LN08, MUG2</b></p> <p>m1 = 1.4 mg kg<sup>-1</sup>;            U(m1) = 0.34 mg kg<sup>-1</sup>; k = 2            u(m1) = 0.34 / 2 = 0.17 mg kg<sup>-1</sup>            RSu(m1)= 0.17 / 1.4 = 12.1 %            RSu(m1) = RSu(m2) = RSu(m3)</p> <p><b>m2</b> = 1.46 mg kg<sup>-1</sup>            u(m2) = 1.46 * 0.121 = 0.18 mg kg<sup>-1</sup>  <b>m3</b> = 2.45 mg kg<sup>-1</sup>            u(m3) = 2.45 * 0.121 = 0.30 mg kg<sup>-1</sup></p> <p>Crit.2: (2.45 - 1.46) / (0.18 + 0.30) =                      = 2.1 &gt; 1.64                      → <b>m3 &gt; m2</b></p> <p>Depicted in Annex 11 as <span style="border: 1px solid black; padding: 2px;">1.46 ↗ 2.45</span></p>	<p><b>Formaldehyde</b> (Annex 12)  <b>LN14, MUG3</b></p> <p>m1 = 9.3 mg kg<sup>-1</sup>;            U(m1) = 2.12 mg kg<sup>-1</sup>; k = 2            u(m1) = 2.12 / 2 = 1.06 mg kg<sup>-1</sup>            RSu(m1)= 1.06 / 9.3 = 11.4 %            RSu(m1) = RSu(m2) = RSu(m3)</p> <p><b>m2</b> = 10.95 mg kg<sup>-1</sup>            u(m2) = 10.95 * 0.114 = 1.25 mg kg<sup>-1</sup>  <b>m3</b> = 11.75 mg kg<sup>-1</sup>            u(m3) = 11.75 * 0.114 = 1.33 mg kg<sup>-1</sup></p> <p>Crit.2: (11.75 - 10.95) / (1.25 + 1.33)                      = 0.31 &lt; 1.64                      → <b>m3 ≤ m2</b></p>

Note: Four laboratories (LN02, LN26, LN27, LO48) seem to have reported expanded uncertainty in %, rather than in mg kg<sup>-1</sup>. For further calculations, the EURL-FCM considered these values as relative expanded uncertainties.

The EURL scrutinised the temperature profiles based on expert judgement. While Regulation (EU) No 10/2011 [10] specifies the test conditions (time and temperature) for plastic food contact material and articles, it does not provide tolerance intervals. The only document referring to tolerance ranges for time and temperature during the migration experiment is the normative Annex C of EN 13130-1:2004 [11], which establishes the following tolerance ranges for migration tests:  $120 \pm 5$  min and  $70 \pm 2$  °C, for contact time and temperature, respectively. These values were used for evaluation of the temperature profiles together with expert judgement. The result of this evaluation is reported in Table 2 using three quality categories: Satisfactory, Questionable and Unsatisfactory.

Annexes 11 and 12 present the evaluation conducted by the EURL based on the two criteria for the 9 results reported by the 43 laboratories for the three migrations in three mugs. The following assessment process was applied:

Criterion 1 ( $m_3 \leq \text{SML}$ ) is considered fulfilled (yes) for each laboratory when the three results (M1m3, M2m3 and M3m3) are proven not to exceed the Specific Migration Limit (SML) taking the standard measurement uncertainty in consideration. When the value of m3 is at or below SML, assessing Criterion 1 is straightforward, even in cases where measurement uncertainties are not provided.

Criterion 2, addressing stability, is considered fulfilled (yes) when there is no observed increase in migration for any consecutive migrations. This criterion always requires knowledge of the laboratory's measurement uncertainty.

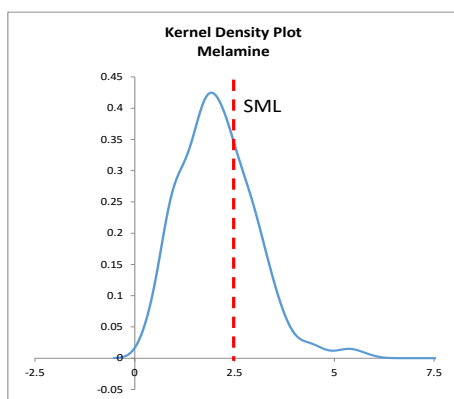
Consequently, samples with stable migration results and with a third migration result below the SML should be categorised as "Compliant." Similarly, non-stable migration results or third migration results above the SML should be labelled as "Non-Compliant." These logical conclusions should be compared with the assessments provided by the laboratories to ensure **coherence**. A compliance statement of a participant is regarded as coherent when supported by the data provided.

However, this consistency was not always observed. Incoherent statements were noted, such as laboratories declaring their samples (i) as "compliant" while presenting experimental evidence of instability or values above the SML, or (ii) as "non-compliant" when no extreme values or instability could be observed.

A detailed analysis of the reported results for test item 2 is presented hereafter.

### Melamine (see Table 2, 3 & Annex 11)

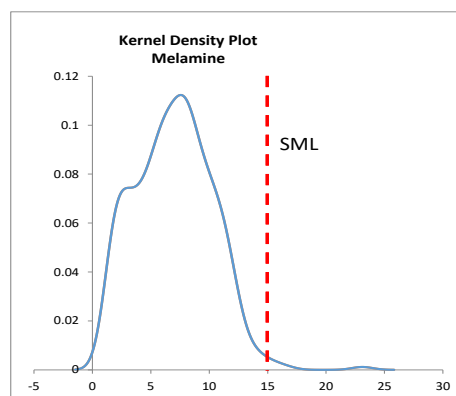
- Most of the laboratories (38 out of 44) reported quantitative results; 5 laboratories did not perform migration tests, while LN15 reported only truncated (“less than”) values;
- The reported relative standard uncertainties (RSu) ranged from 3 to 27 %; while 6 laboratories did not provide their measurement uncertainties.
- Except one outlier (LO47 - MUG2,m2), all the 340 reported values ranged from 0.3 and 5.8 mg kg<sup>-1</sup>, with a median value of 2.0, hence bracketing the SML of 2.5 mg kg<sup>-1</sup>, as shown in the Kernel density plot [9] below.



- 5 laboratories issued an “incoherent” compliance statement that is contradicted by their experimental data.
- 5 laboratories gave a compliance statement without reporting uncertainty, thus making the evaluation impossible.
- 9 laboratories reported some third migration results that exceeded the SML whereas 28 other laboratories provided values equal to or smaller than SML. This confirms the challenge in determining the compliance for melamine, particularly when values are close to the SML.
- Results from 22 laboratories support the stability of the melamine migration from the test item 2 whereas 10 laboratories observed the opposite.
- 7 laboratories **presented experimental evidence indicating the non-compliance of melamine in the mugs due to stable successive migrations but with the 3<sup>rd</sup> migration above SML**, aligning with the EURL’s findings; one of them (LN11) provided unsatisfactory temperature profile.

### Formaldehyde (see Table 2, 3 & Annex 12)

- 43 laboratories reported results (excl. LO47);
- No truncated values were reported;
- The reported relative standard uncertainties (RSu) ranged from 2 to 26 %; while 6 laboratories did not provide their MU.
- Except one outlier (LN22 - MUG1,m1), all the 381 reported values ranged from 1.2 to 16.5 mg kg<sup>-1</sup>, with a median value of 7.0 mg kg<sup>-1</sup>; the third migration result never exceeded the SML of 15 mg kg<sup>-1</sup>, when taking measurement uncertainties into account, thus complying with Criterion 1 (m3-u ≤ SML), as shown in the Kernel density plot [9] below.



- 9 laboratories issued an “incoherent” compliance statement that is contradicted by their experimental data.
- 7 laboratories gave a compliance statement without reporting uncertainty, thus making the evaluation impossible.
- All laboratories reported third migration results equal to or below the SML.
- Results from 21 laboratories demonstrated increasing levels in successive migrations, thus failing to comply with Criterion 2.
- 15 laboratories presented experimental evidence supporting the compliance and stability of formaldehyde in the mugs. However, three of them (LN15, LO23, LO39) erroneously assessed test item 2 as non-compliant. Therefore, only 12 of the laboratories provided a compliance statement in line with the EURL conclusions.

Finally, only 6 laboratories assessed correctly the compliance of test item 2 for both melamine and formaldehyde in line with the observations of the EURL.

**Table 2:** Comprehensive presentation detailing compliance statements of the participants ("statement") related to melamine (M) and formaldehyde (F), stability ("stable") and compliance with SML (" $<SML$ ") assessed by EURL, coherence of their statement to their data ("coherence"), the calculated relative standard uncertainty ("RSu ( $k=1$ )"), the evaluation of the temperature profile used for migration ("T-profile"; S, satisfactory; Q, questionable; U, unsatisfactory) and the overall agreement with the EURL conclusions ("OVERALL").

Lab	Melamine					Lab	Formaldehyde					T profile	OVERALL
	Statement	Stable	< SML	coherence	RSu (k=1)		Statement	Stable	< SML	coherence	RSu (k=1)		
LN01	NC	yes	no	yes	6%	LN01	C	yes	yes	yes	12%	S	MF
LN02	C	yes	yes	yes	11%	LN02	NC	no	yes	yes	4%	Q	
LN03	C	yes	yes	yes	8%	LN03	C	no	yes	no	6%	U	
LN04	not tested					LN04	NC	no	yes	yes	8%	U	
LN05	NC	?	?	?		LN05	NC	?	yes	?		S	
LN06	not tested					LN06	NC	?	yes	?		S	
LN07	NC	no	yes	yes	6%	LN07	NC	no	yes	yes	6%	S	
LN08	NC	no	yes	yes	12%	LN08	NC	no	yes	yes	6%	Q	
LN09	C	no	yes	no	3%	LN09	C	no	yes	no	6%	U	
LN10	C	yes	yes	yes	13%	LN10	C	yes	yes	yes	10%	U	F
LN11	NC	yes	no	yes	10%	LN11	NC	no	yes	yes	8%	U	M
LN12	C	?	yes	?		LN12	C	?	yes	?		Q	
LN13	NC	yes	no	yes	15%	LN13	C	yes	yes	yes	14%	S	MF
LN14	NC	yes	no	yes	14%	LN14	C	yes	yes	yes	12%	Q	MF
LN15	NC	yes	yes	no		LN15	NC	yes	yes	no	10%	S	F
LN16	C	yes	yes	yes	7%	LN16	C	yes	yes	yes	5%		F
LN17	NC	no	yes	yes	3%	LN17	NC	no	yes	yes	7%	Q	
LN18	NC	yes	no	yes	4%	LN18	C	yes	yes	yes	10%	S	MF
LN19	C	yes	yes	yes	10%	LN19	C	no	yes	no	10%		
LN20	C	yes	yes	yes	20%	LN20	C	yes	yes	yes	15%	S	F
LN21	NC	yes	no	yes	13%	LN21	C	yes	yes	yes	12%	U	MF
LN22	not tested					LN22	?	no	yes	?	2%	U	
LN23	NC	no	yes	yes	7%	LN23	NC	yes	yes	no	19%	S	F
LN24	C	yes	yes	yes	17%	LN24	NC	no	yes	yes	12%	S	
LN25	NC	yes	no	yes	5%	LN25	C	yes	yes	yes	3%	S	MF
LN26	NC	no	yes	yes	6%	LN26	NC	no	yes	yes	2%	S	
LN27	C	yes	yes	yes	15%	LN27	C	no	yes	no	5%	S	
LO30	NC	no	no	yes	6%	LO30	NC	no	yes	yes	7%	S	
LO31	C	yes	yes	yes	27%	LO31	C	yes	yes	yes	26%	S	F
LO32	NC	?	?	?		LO32	C	?	yes	?		S	
LO33	C	?	yes	?		LO33	NC	?	yes	?		S	
LO34	C	yes	yes	yes	14%	LO34	C	yes	yes	yes	7%	S	F
LO35	C	?	yes	?		LO35	C	no	yes	no	5%	Q	
LO36	C	yes	yes	yes	21%	LO36	C	yes	yes	yes	16%	U	F
LO37	NC	yes	yes	no	15%	LO37	NC	?	yes	?	17%	Q	
LO38	C	yes	yes	yes	17%	LO38	NC	?	yes	?		Q	
LO39	NC	yes	yes	no	25%	LO39	NC	yes	yes	no	13%	S	F
LO40	not tested					LO40	NC	no	yes	yes	18%	Q	
LO43	NC	no	yes	yes	14%	LO43	NC	no	yes	yes	11%	S	
LO44	NC	yes	yes	no	17%	LO44	NC	no	yes	yes	10%	Q	
LO45	C	yes	yes	yes	5%	LO45	NC	no	yes	yes	5%	S	
LO46	not tested					LO46	C	no	yes	no	11%	S	
LO47	NC	no	no	yes	5%	LO47	not tested						
LO48	NC	no	yes	yes	10%	LO48	NC	no	yes	yes	5%	S	

**Table 3** Summarised overview of the compliance statements of the laboratories for melamine (non-compliant) and formaldehyde (compliant), reported stability, reported compliance with SML, corresponding number of laboratories, coherence of their statement, agreement with the EURL conclusions.

### Melamine, assumed "Non-Compliant"

Lab.statement	Stable?	< SML?	Nr	coherent with experiment?	aligned with EURL	Labs
NC	yes	no	7	yes	Yes	LN01; LN11; LN13; LN14; LN18; LN21; LN25
NC	yes	yes	4	no		LN15; LO37; LO39; LO44
NC	no	no	2	yes		LO30; LO47
NC	no	yes	7	yes		LN07; LN08; LN17; LN23; LN26; LO43; LO48
NC	?	?	2			LN05; LO32
C	yes	yes	13	yes		LN02; 03; 10; 16; 19; 20; 24; 27; LO31; 34; 36; 38; 45
C	no	yes	1	no		LN09
C	?	yes	3			LN12; LO33; LO35
not tested	--	--	5			LN04; LN06; LN22; LO40; LO46
	(?): no MU	total	44			

### Formaldehyde, assumed "Compliant"

Lab.statement	Stable?	< SML?	Nr	coherent with experiment?	aligned with EURL	Labs
C	yes	yes	12	yes	Yes	LN01; 10; 13; 14; 16; 18;20; 21; 25; LO31; 34; 36
C	no	yes	6	no		LN03; LN09; LN19; LN27; LO35; LO46
C	?	yes	2			LN12; LO32
NC	yes	yes	3	no		LN15; LN23; LO39
NC	no	yes	14	yes		LN02; 04; 07; 08; 11; 17; 24; 26; LO30; 40; 43; 44; 45; 48
NC	?	yes	5			LN05; LN06; LO33; LO37
--	no	yes	1			LN22
not tested	--	--	1			LO47
	(?): no MU	total	44			

#### 6.3.5. Observations on the compliance assessment of test item 2

Given the significant variations observed in compliance statements across laboratories, the novelty of compliance assessment for NRLs and OCIs, and the large variety of temperature profiles reported by the laboratories, in addition to migrated levels of melamine in food simulant B close to the SML, the EURL-FCM conducted an additional experiment. This experiment aimed to assess the impact of temperature tolerance in the food simulant on the compliance of test item 2. Initially, a migration test was conducted on three different mugs, using slightly different oven settings while ensuring that the temperature profiles remained within the tolerance range of 68 – 72 °C (see Annex 8).

Annex 7 demonstrates the EURL's ability to replicate the temperature profile for consecutive migrations for test item 2. This is important for obtaining repeatable migration results (Annexes 9A and 10A).

Annex 8 shows that different temperature profiles can occur in the food simulant during migration, with ranges 68 - 72 °C, 67.8 - 69.5 °C, and 67.3 - 68.3 °C, the latter exceeding the tolerance range for 15 minutes. Annexes 9B and 10B show that the migration levels increase with higher "average" temperature of the food simulant. Specifically for melamine (Annex 9B), migrations with (lower) temperature profiles outside the tolerance range exhibit significantly lower levels compared to those within the tolerance range. A similar trend is observed for formaldehyde (Annex 10B).

In the case of melamine, migration levels significantly below the SML indicate compliance when the temperature profile is lower, whereas the migration is significantly above the SML, indicating non-compliance, with the highest temperature profile. This experiment highlights the sensitivity of both melamine and formaldehyde migration to minor variations in the contact temperature profile, even within the tolerable range. Therefore, to accurately assess the stability of an article, it is crucial to conduct **three consecutive migrations with similar temperature profiles**. This is essential to avoid erroneously declarations of instability for an article that is in fact stable.

Challenges arise in maintaining consistent compliance statements concerning the SML, as narrowing the tolerance range of the temperature in the food simulant may be required. It should be noted that these observations may or may not be applicable to other materials, articles, or migration conditions.

The EURL-FCM emphasises the critical importance of conducting migration tests strictly under the required contact time and at the correct contact temperature of the food simulant (not that of the oven). Based on appropriate analytical results and despite acknowledging the complications to follow, the EURL challenges the tolerable range ( $70 \pm 2$  °C) for the contact temperature laid down in the normative Annex C of EN 13130-01:2004 [11], considering it too broad for some analytes (as melamine and formaldehyde) under certain conditions (2 h at 70 °C) depending on the kinetic of the migration process and thus insufficient to ensure comparable migration (Annex 9-10).

For future proficiency testing exercises involving a migration step, participants will be requested to use exclusively calibrated data loggers capable of measuring the contact temperature of the food simulant within the tested article at high frequency (30-60 seconds). Achieving a satisfactory profile requires thorough optimisation before the actual migration experiment, using the spare article provided. When testing articles repeatedly, laboratories must guarantee repeatable temperature profiles for the first, second, and third migrations to ensure a proper assessment of migration stability. This involves maintaining identical initial temperatures of the articles at the moment of filling with the food simulant pre-heated to the same temperature.

Other factors that could impact migration, as demonstrated in the previous PTs, include food simulant losses (up to 25 ml [13-15]) and their compensations, uniformity of the contact temperature profile within the oven; timing and location of the food simulant filling, accurate correlation between the measured volume and calculated contact surface, etc. As a general guideline, the volume of the food simulant should be measured at room temperature, while the contact surface should be calculated using a mug filled with pre-heated food simulant.

### **6.3.6. Additional information extracted from the questionnaire**

All participants completed the questionnaire, providing valuable information about their laboratories, operational methodologies, and analytical methods. Annex 13 summarises the experimental details, the technique used and additional information requested.

The majority of the participants (26 out of 43) were accredited according ISO 17025 for the analyses of both melamine and formaldehyde in food simulants, while 10 participants are accredited only for formaldehyde and two exclusively for melamine. Six

participants declared that they do not have migration procedures within the scope of their accreditation, and an additional five were not accredited for the scope of this PT.

### **Instrumental techniques applied**

Analytical techniques for the analyses of melamine and formaldehyde in food simulant B are presented in Table 4, while the additional experimental details are provided in Annex 13. The use of different instrumental techniques for both measurands did not impact the performance of the laboratories in analysing test item 1, as shown in Annexes 5 and 6.

**Table 4** Analytical techniques used to determine melamine (MEL) and formaldehyde (FA) in test item 1.

Technique	MEL	FA
HPLC-DAD	3	1
HPLC-UV	13	7
LC-MS	17	1
LC-MS/MS	5	1
Spectrophotometry	--	23

The main difference among the instrumental techniques relates to the achievable Limits of Quantification (LOQs). For melamine, reported LOQs start at 1  $\mu\text{g kg}^{-1}$  and higher for LC-MS/MS, while for HPLC-UV they range from 1 to 1.5  $\text{mg kg}^{-1}$ , resembling reporting limits more than LOQs. However, the majority of participants reported a reasonable LOQ range of 0.05-0.5  $\text{mg kg}^{-1}$ . For formaldehyde, the LOQ range is much narrower (0.1-3  $\text{mg kg}^{-1}$ ), and there is no significant difference observed based on the sample preparation technique, whether using 2,4-dinitrophenylhydrazin, acetyl acetone or chromotropic acid.

## **7 Conclusion**

The proficiency test FCM-23/01 was organised to assess (i) the analytical capabilities of EU National Reference Laboratories and Official Control Laboratories in determining the mass fractions of melamine and formaldehyde in food simulant B and (ii) the ability to assess the compliance of a repeated-use article against the new requirements outlined in Commission Regulation (EU) 2020/1245.

The participants demonstrated a highly satisfactory overall performance in determining these substances in food simulant B (3% acetic acid), with approximately 95 % of the results achieving z scores below 2 (satisfactory) against the 15 % standard deviation for proficiency assessment set by the EURL-FCM. This suggests that the  $\sigma_{\text{pt}}$  could potentially be further reduced in the future.

Most of the participants reported realistic measurement uncertainty estimations.

The task of evaluating participants' compliance statements regarding test item 2 posed notable challenges as even minor variations in migration test conditions, while within acceptable limits, significantly influenced the test results. Only 28% of the laboratories accurately assessed compliance and stability for formaldehyde in test item 2, aligning with the conclusions drawn by the European Reference Laboratory (EURL).

Assessing the stability of melamine and its compliance with the specific migration limit (SML) for test item 2 proved to be particularly difficult as the migration was close to the

SML. Less than 20% of the laboratories correctly evaluated compliance and stability for melamine in test item 2, consistent with the EURL conclusions.

In conclusion, the assessment of compliance for melamine-bamboo mugs remains a challenging task that requires further investigation.

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## References

- [1] Commission Regulation (EU) 2020/1245 of 2 September 2020 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, Official Journal of the European Union L 288/1 (2020). [32020R1245](#)
- [2] Commission Regulation, (EU) No 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, Official Journal of the European Union L 95/1 (2017). [32017R0625](#)
- [3] ISO/IEC 17043:2023 "Conformity assessment – General requirements for proficiency testing", issued by ISO-Geneva (CH), International Organisation for Standardization.
- [4] ISO/IEC 17025:2017 "General requirements for the competence of testing and calibration laboratories", issued by ISO-Geneva (CH), International Organisation for Standardization.
- [5] ISO 13528:2022 "*Statistical methods for use in proficiency testing by interlaboratory comparison*", issued by ISO-Geneva (CH), International Organisation for Standardization.
- [6] SoftCRM, (n.d.). <http://www.eie.gr/iopc/softcrm/index.html> .
- [7] ISO/IEC Guide 98-3:2008 "Uncertainty of measurement Part 3: Guide to the expression of uncertainty in measurement" (GUM:1995), issued by ISO-Geneva (CH), International Organisation for Standardization.
- [8] S L R Ellison and A Williams (Eds). Eurachem/CITAC guide: Quantifying Uncertainty in Analytical Measurement, Third edition, (2012) ISBN 978-0-948926-30-3. Available from [www.eurachem.org](http://www.eurachem.org).
- [9] Analytical Methods Committee, "MS EXCEL Add-in for Robust Statistics" and "Kernel distribution plot". Statistical Subcommittee of the Analytical Methods Committee of the UK Royal Society of Chemistry. Available from <http://bit.ly/3U42YWU>, last accessed on 19/01/2024.
- [10] Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food
- [11] EN 13130-1:2004 – "Materials and articles in contact with foodstuffs. Plastics substances subject to limitation Guide to test methods for the specific migration of substances from plastics to foods and food simulants and the determination of substances in plastics and the selection of conditions of exposure to food simulants", issued by CEN-Brussels (BE), European Committee for Standardisation.
- [12] Analytical Methods Committee, "Representing data distributions with kernel density estimates", AMC Tech. Br. 4 (2006) 2. [http://www.rsc.org/images/brief4\\_tcm18-25925.pdf](http://www.rsc.org/images/brief4_tcm18-25925.pdf).
- [13] Tsochatzis, E., Mieth, A., Simoneau, C., Hoekstra, E., Report of an inter-laboratory comparison from the European Reference Laboratory for Food Contact Materials: ILC 01 2015 – Temperature control during migration tests by article filling - EUR 27826, Publications Office of the European Union, Luxembourg, 2015. <https://europa.eu/!79ndcq>
- [14] Tsochatzis, E., J.F. Alberto Lopes, P. Robouch and E.J. Hoekstra; "EURL-FCM-02-2016 Proficiency Test Report: Temperature control during migration and quantification of migrated FCM No 500 by article filling", EUR 29121 EN, European Commission, Ispra, 2018, <https://doi.org/10.2760/940236>
- [15] S. Valzacchi, J.L. Vicente, F. Cordeiro, P. Robouch and E.J. Hoekstra, "EURL-FCM-01-2017 proficiency test report: Quantification of migration of bisphenol A from can coatings by article filling". JRC Technical Reports, 2018; JRC111695. <https://europa.eu/!MNdTb9>

## List of abbreviations and symbols

DAD	Diode Array Detector
DG SANTE	Directorate General for Health and Food Safety
EC	European Commission
EFSA	European Food Safety Authority
EU	European Union
EURL	European Union Reference Laboratory
FCM	Food Contact Materials
GUM	Guide for the Expression of Uncertainty in Measurement
GC-MS(MS/MS)	Gas chromatography-mass spectrometry or tandem mass spectrometry
HPLC-FLD	High performance liquid chromatography-fluorescence detection
HPLC-UV(DAD)	High performance liquid chromatography-ultraviolet (diode array detection)
ILC	Interlaboratory Comparison
ISO	International Organization for Standardization
JRC	Joint Research Centre
LOD	Limit of Detection
LOQ	Limit of Quantification
NRL	National Reference Laboratory
OCL	Official Control Laboratory
PT	Proficiency test
SOP	Standard operating procedure
$k$	coverage factor
$\sigma_{pt}$	standard deviation for proficiency test assessment
$u(x_i)$	calculated standard measurement uncertainty (of participant "i")
$u(x_{pt})$	standard uncertainty of the assigned value
$u_{char}$	(standard) uncertainty contribution due to characterisation
$u_{hom}$	(standard) uncertainty contribution due to homogeneity
$u_{st}$	(standard) uncertainty contribution due to stability
$U(x_i)$	reported expanded uncertainty by participant "i"
$U(x_{pt})$	expanded uncertainty of the assigned value
$x_i$	reported mean value by participant "i"
$x_{pt}$	assigned value
$z$ (or $z'$ )	$z$ (or $z'$ ) score
$\zeta$	zeta score

## List of figures

- Figure 1:** Overview of laboratory performance per measurand according to  $z$  and  $\zeta$  scores for formaldehyde and melamine in test item 1.
- Figure 2:** Box plots of the melamine and formaldehyde results reported by the participants for three consecutive migrations from three mugs (MUG1-3).

## List of tables

- Table 1:** Assigned values ( $x_{pt}$ ) and standard deviation for the PT assessment ( $\sigma_{pt}$ ) for melamine and formaldehyde in test item 1 (T1).
- Table 2:** Comprehensive presentation detailing compliance statements of the participants related to MEL and FA, compliance assessed based on their data, coherence of their statement to their data, the calculated relative standard uncertainty, and the overall agreement with the EURL conclusions (M and F for melamine and formaldehyde). In addition, the evaluation of the temperature profile used for migration (S, Q, U, see migration conditions).
- Table 3:** Summarised overview of the compliance statements (for MEL and FA), compliance assessed based on their data (stability and SML), corresponding number of laboratories, coherence of their statement to their data, agreement with the EURL conclusions
- Table 4** Analytical techniques used to determine melamine (MEL) and formaldehyde (FA) in test item 1.

## Annex 1: A. Announcement of the PT round “FCM-23/01”



EUROPEAN COMMISSION  
JOINT RESEARCH CENTRE

Directorate F - Health, Consumers and Reference Materials (Geel)  
Food and Feed Compliance



Ispra/Geel, 31 January 2024

**Subject: Announcement of a Proficiency Testing round “FCM-23/01”**

Dear NRL colleagues,

The European Union Reference Laboratory for Food Contact Materials (EURL-FCM) will organise a proficiency test round (FCM-23/01) for the “Determination of melamine and formaldehyde migrated from bamboo/melamine kitchenware”. This PT is organised to support the sections 2.1.6 and 3.3.2 of Annex V of the Commission Regulation (EU) 2020/1245, related to the repeated use materials and article.

It is your duty as NRL to participate in the PTs organised by the EURL-FCM as agreed in the work program. There is no charge for participation.

Two test items will be provided:

- One solution of melamine and formaldehyde in food simulant B;
- 4 mugs for migration test in food simulant B

This PT will be organised under ISO 17043 accreditation.

The following time schedule is foreseen:

Invitation for registration:	end of May 2023
Deadline for registration:	mid-June 2023
Sample dispatch:	end June 2023
Deadline for reporting:	end August 2023
Draft PT report:	September 2023

Please forward this invitation to the Official Control Laboratories (OCLs) in your network that would be interested in participating. As the test items are limited, the OCLs registration will be accepted on first come first serve base depending on sample availability.

Soon you will receive an e-mail with a link for registration.

Do not hesitate to contact us if you have further questions.

Stefanka Bratinova  
PT coordinator

Commission européenne/Europese Commissie, Ruesseweg 111, 2440 Geel, BELGIQUE/BELGIË - Tel. +32 14571705  
Office: 010 L01/103B - Tel. direct line +32 14571-1234

Commissione europea, Via Enrico Fermi 2749, 21027 Ispra VA, ITALIA - Tel. +39 332789111

Eddo.hoekstra@ec.europa.eu

## Annex 1: B. Invitation letter

 Ref. Ares(2023)3591361 - 24/05/2023



EUROPEAN COMMISSION  
JOINT RESEARCH CENTRE  
Directorate F - Health, Consumers & Reference Materials  
**European Union Reference Laboratory for  
Food Contact Materials**



Ispra/Geel, 17 May 2023

**Subject: Invitation to participate in Proficiency Testing round "FCM-23/01"**

Dear Colleague,

The European Union Reference Laboratory for Food Contact Materials (EURL-FCM), managed by the Joint Research Centre (JRC) of the European Commission (EC), invites you to participate in the Proficiency Testing round **FCM-23/01** for the "**Determination of melamine and formaldehyde in bamboo/melamine kitchenware**".

It is your duty as NRL to participate in the PTs organised by the EURL-FCM as agreed in the work programme. There is no charge for participation.

The following test items will be dispatched:

- test item 1 - One solution of melamine and formaldehyde in clean food simulant B;
- test item 2 - 4 mugs for migration test in food simulant B.

Performance scoring (z-scores) for melamine and FA will be assigned to the participants for test item 1. For test item 2, the compliance statement and its justification will be evaluated, though all results from the 3 consecutive migration tests should be reported to support the statement.

The procedures used for the organisation of PTs are accredited according to ISO/IEC 17043:2010 and guarantee that the identity of the participants and the information provided by them is treated as confidential.

However, laboratory codes of National Reference Laboratories (NRLs) - appointed in line with Regulation (EU) 2017/625 - will be disclosed to DG SANTE upon request for (long-term) performance assessment. Similarly, laboratory codes of appointed Official Control Laboratories (OCLs) may be disclosed to their NRL upon request.

If you intend to participate, register electronically as soon as possible by using the link below and following the instructions provided.

<https://web.jrc.ec.europa.eu/ilcRegistrationWeb/registration/registration.do?selComparison=2881>

The **deadline for registration is set to 12 June 2023**.

Samples will be dispatched by the end-June.

The deadline for submission of results will be end August.

Do not hesitate to contact us if you have any question.

Kind regards

/signed electronically in Ares/  
Stefanka Bratinova  
FCM-23/01 PT Coordinator

/signed electronically in Ares/  
Eddo J. Hoekstra  
Operating Manager EURL-FCM

Cc: U.Vincent, Head of Unit, JRC.F.5 Food and Feed Compliance

Commission européenne/Europese Commissie, Retsiseweg 111, 2440 Geel, BELGIQUE/BELGIE - Tel. +32 14571705  
Office: 010 L01/103B - Tel. direct line +32 14571-1234

 Electronically signed on 22/05/2023 13:10 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121

Eddo.hoekstra@ec.europa.eu

## Annex 2: Instructions for participants

Ref. Ares(2023)4255961 - 20/06/2023



EUROPEAN COMMISSION  
JOINT RESEARCH CENTRE  
Directorate F – Health and Food  
Food and Feed Compliance

Geel, 19 June 2023  
JRC.F.5/SPB/mt 23-043

**Subject: Instructions to participants in Proficiency Testing round “FCM-23/01”**

Dear Ms./Mr.,

Thank you for participating in the FCM-23/01 proficiency test (PT) "**Determination of melamine and formaldehyde in bamboo/melamine kitchenware**".

The parcels are dispatch today. Each parcel contains:

- (1) test item 1 - One 20 mL vial containing a solution of melamine and formaldehyde in food simulant B;
- (2) test item 2 - 4 mugs for migration test in food simulant B.

Upon arrival of this parcel, please check whether the test items are undamaged after the transport.

Test item 1 should be stored refrigerated until analysis and should be analysed for formaldehyde and melamine content according to your routine procedure. Test results +/- MU should be expressed in mg/kg food simulant assuming the density of food simulant B 1 kg·m<sup>-3</sup>. The laboratory performance will be z and ζ-scored for evaluation.

Test item 2 should be treated as routine samples for which the compliance have to be assessed following the requirements of the Commission Regulation (EU) 2020/1245 of 2 September 2020 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food and more specific the Section 2.1.6 of Annex V, related to the compliance rules for “Repeated use materials and articles”.

Three consecutive migration experiments should be performed (MIG1, MIG2 and MIG3) at 70 °C for 2 h and results for formaldehyde and melamine have to be reported for three mugs (MUG1, MUG2 and MUG3). The results should be reported in mg/kg food simulant in the same format (e.g. number of significant figures) as you normally report to customers.

Commission européenne/Europese Commissie, Retieseweg 111, 2440 Geel, BELGIQUE/BELGIË – Tel. +32 14571705  
Office: 210 L00/032 – Tel. direct line +32 14571-1800

Commissione europea, Via Enrico Fermi 2749, 21027 Ispra VA, ITALIA – Tel. +39 0332789111

Stefanka-Petkova.BRATINOVA@ec.europa.eu

Three consecutive migration experiments should be performed (MIG1, MIG2 and MIG3) at 70 °C for 2 h and results for formaldehyde and melamine have to be reported for three mugs (MUG1, MUG2 and MUG3). The results should be reported in mg/kg food simulant in the same format (e.g. number of significant figures) as you normally report to customers.

Example of the reporting table:

Sample Code **x5x10450616 - FSB**  
 For decimal values use a dot "." instead of a comma ",".

Measurand	Measurement	Reference Date	Result	Unit	Uncert. value	Coverage Faktor k	Technique	Clear
formaldehyde	Content[mg/kg]	Mean	=	mg/kg			No technique	
melamine	Content[mg/kg]	Mean	=	mg/kg			No technique	

Sample Code **x5x10439073 - MUG1**  
 For decimal values use a dot "." instead of a comma ",".

Measurand	Measurement	Reference Date	Result	Unit	Uncert. value	Coverage Faktor k	Technique	Clear
formaldehyde	Content[mg/kg]	MIG1	=	mg/kg			No technique	
formaldehyde	Content[mg/kg]	MIG2	=	mg/kg			No technique	
formaldehyde	Content[mg/kg]	MIG3	=	mg/kg			No technique	
melamine	Content[mg/kg]	MIG1	=	mg/kg			No technique	
melamine	Content[mg/kg]	MIG2	=	mg/kg			No technique	
melamine	Content[mg/kg]	MIG3	=	mg/kg			No technique	

Sample Code **x5x10442921 - MUG2**  
 For decimal values use a dot "." instead of a comma ",".

Measurand	Measurement	Reference Date	Result	Unit	Uncert. value	Coverage Faktor k	Technique	Clear
formaldehyde	Content[mg/kg]	MIG1	=	mg/kg			No technique	
formaldehyde	Content[mg/kg]	MIG2	=	mg/kg			No technique	
formaldehyde	Content[mg/kg]	MIG3	=	mg/kg			No technique	
melamine	Content[mg/kg]	MUG1	=	mg/kg			No technique	
melamine	Content[mg/kg]	MUG2	=	mg/kg			No technique	
melamine	Content[mg/kg]	MUG3	=	mg/kg			No technique	

Sample Code **x5x10462158 - MUG3**  
 For decimal values use a dot "." instead of a comma ",".

Measurand	Measurement	Reference Date	Result	Unit	Uncert. value	Coverage Faktor k	Technique	Clear
formaldehyde	Content[mg/kg]	MIG1	=	mg/kg			No technique	
formaldehyde	Content[mg/kg]	MIG2	=	mg/kg			No technique	
formaldehyde	Content[mg/kg]	MIG3	=	mg/kg			No technique	
melamine	Content[mg/kg]	MIG1	=	mg/kg			No technique	
melamine	Content[mg/kg]	MIG2	=	mg/kg			No technique	

The results from the migration experiment will be not scored with z- and  $\sigma$  scores, though all the results will be published and commented. Instead, only the correctness of the compliance statements justifications will be evaluated. For that purpose, please be as detailed as possible in supporting your statements with explanations. This information should be filled in the questionnaire part of the same interface

For evaluation of the migration experimental conditions, the temperature profiles of the food simulant during the migration test and the volumes of the food simulants should be provided as well. As the reporting interface does not support yet the file uploads, you have to send separate files via e-mail with downloads from the data loggers readings or an excel

table filled in with the T readings of the simulant every 5 min during the 120 min migration experiment.

The homogeneity study for test item 1 was performed with a sample intake of 1 mL

You can find the MILC reporting website at <https://web.jrc.ec.europa.eu/ilcReportingWeb>. You need first to login with your EU login account (see detailed guideline) and then enter the personal password. Your unique password is indicated above in the box under your address data. The system will guide you through the reporting procedure. Do not forget to submit and confirm when required.

Directly after submitting your results and the questionnaire online, you will be requested to print the completed report form. Please check carefully this report form and send it back via mail to us. In case mistakes are detected, contact the PT coordinator as soon as possible before the reporting deadline.

**The deadline for submission of results is 25/08/2023.** It will not be possible to submit your results after the deadline.

The procedures used for the organisation of PTs are accredited according to ISO/IEC 17043:2010 and guarantee that the identity of the participants and the information provided by them is treated as confidential. However, lab codes of National Reference Laboratories appointed in line with Regulation (EU) 2017/625, will be disclosed to DG SANTE upon request for (long-term) performance assessment. Lab codes of appointed Official Control Laboratories may be disclosed to their National Reference Laboratory upon request.

Remember that collusion is contrary to professional scientific conduct and serves only to nullify the benefits of proficiency tests to customers, accreditation bodies and analysts alike.

Your participation in this PT is greatly appreciated. Please be aware of the existence of an appeal procedure in case you disagree with your scores.

Do not hesitate to contact me for further information.

With kind regards,


*/signed electronically in Ares/*

Stefanka Bratinova  
PT Coordinator

*/signed electronically in Ares/*

Giorgia Beldi  
Deputy PT Coordinator

## Annex 3: Questionnaire



**JOINT RESEARCH CENTRE**  
ILC Questionnaire

Comparison selector

FCM 2023/01 [2881] [milc administration](#)

Questionnaire data

Ready to publish

Description

Please provide statements of compliance (for melamine and formaldehyde separately) of the test item 2 related to the requirements of the COMMISSION REGULATION (EU) 2020/1245 of 2 September 2020 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food. Then answer the questions below.

Questionnaire questions

1. Please provide compliance statement regarding melamine in MUGs \* [Q:111334: CHECKBOX] ?

compliant [A:1394]

non compliant [A:2393]

2. Please justify your statement of compliance for melamine \* [Q:111335: TEXT] ?

3. Please provide statement of compliance related to the formaldehyde in MUGs \* [Q:111336: CHECKBOX] ?

compliant [A:1394]

non-compliant [A:1395]

4. Please justify your statement of compliance related to formaldehyde \* [Q:111337: TEXT] ?

5. Please indicate your status as a laboratory \* [Q:111338: CHECKBOX]

NRL [A:1798]

OCL [A:2394]

other [A:134]

6. Are you accredited for the analyses of melamine and formaldehyde in food simulant B? \* [Q:111339: CHECKBOX]

- No [A:396]
- Other (please specify) [A:1235]
- Yes, for FA [A:2396]
- Yes, for MEL; [A:2395]
- Yes, for both [A:2397]

7. Are you accredited for the migration procedure? \* [Q:111403: CHECKBOX]

- no [A:179]
- other, please specify below [A:384]
- yes [A:124]

7.1. Please specify [Q:111404: TEXT]

8. Did you pre-heat the simulant before filling the article? \* [Q:111396: RADIO]

- NO [A:299]
- Other [A:1437]
- YES [A:298]

8.1. Temperature of the food simulant just before the filling of the test items \* if parent A:298 checked [Q:111398: TEXT]

9. How did you control the temperature of the food simulant during the migration experiments \* [Q:111343: CHECKBOX]

- Other (please specify) [A:1235]
- calibrated datalogger [A:2400]
- calibrated thermometer [A:2399]
- non-calibrated thermometer/datalogger [A:2401]
- not controlled [A:2402]

10. Did you preheat the mugs before migration? \* [Q:111342: RADIO]

- No [A:1236]
- Yes [A:297]

11. Volume of the food simulant used for the migration experiments \* [Q:111340: TEXT]

12. Temperature of the food simulant during the migration experiment (in °C) - Please send by mail a file from datalogger or a table with the FS temperature any 5 minutes of the migration experiment [Q:111341: TEXT] ?

13. Did you measure the food simulant losses after each migration? \* [Q:111344: RADIO]

- No [A:1236]
- Yes [A:397]

14. If yes, please report the volume of the losses in ml [Q:111345: TEXT]

15. Analytical techniques for melamine in food simulant? \* [Q:111346: CHECKBOX]

- HPLC-DAD [A:2404]
- HPLC-UV [A:1389]
- LC-MS [A:632]
- LC-MS/MS [A:633]
- other, please specify below [A:384]

15.1. Please specify [Q:111408: TEXT]

16. LOQ for melamine in food simulant B? \* [Q:111405: TEXT]

17. Sample preparation for formaldehyde? \* [Q:111347: CHECKBOX]

- 2,4-dinitrophenylhydrazine [A:2412]
- acetyl acetone (AA) [A:2405]
- chromotropic acid [A:2407]
- other, please specify below [A:384]

17.1. Please specify [Q:111409: TEXT]

18. Analytical techniques for formaldehyde \* [Q:111397: RADIO]

- HPLC-UV [A:1389]
- HPLC/DAD [A:2403]
- Other (please specify) [A:1235]
- Spectrophotometry [A:2413]

18.1. Please specify \* if parent A:1235 checked [Q:111410: TEXT]

19. LOQ for formaldehyde in food simulant B? \* [Q:111406: TEXT]

20. Time (in hours/days) between the migration experiments (MIG1, MIG2 and MIG3) \* [Q:111348: TEXT]

21. surface to volume ratio applied to the test result \* [Q:111407: TEXT]

22. Any problem encountered? \* [Q:111349: TEXT]

version: 2.2.8 (01/07/2021) [GEEL\_01]

## Annex 4: Homogeneity and stability results

### A. Homogeneity study for test item 1, all values in mg kg<sup>-1</sup>

		test item 1			
		Melamine		Formaldehyde	
1		2.52	2.53	12.51	12.53
2		2.52	2.51	12.55	12.52
3		2.53	2.52	12.52	12.50
4		2.54	2.52	12.44	12.52
5		2.52	2.52	12.50	12.46
6		2.52	2.53	12.55	12.53
7		2.53	2.52	12.49	12.56
8		2.53	2.52	12.52	12.51
9		2.52	2.51	12.54	12.55
10		2.52	2.51	12.54	12.52
Mean		2.52		12.52	
U <sub>hom</sub>		0.12 %		0.11 %	
σ <sub>pt</sub>		15 %		15 %	
0.3 σ <sub>pt</sub>		4.5 %		4.5 %	
U <sub>hom</sub> < 0.3 σ <sub>pt</sub>		passed		passed	

Where: σ<sub>pt</sub> is the standard deviation for the PT assessment,  
 U<sub>hom</sub> is the standard uncertainty contribution due to homogeneity

### B. Homogeneity study for test item 2, all values in mg kg<sup>-1</sup>

	Melamine			Formaldehyde		
	MIG1	MIG2	MIG3	MIG1	MIG2	MIG3
<b>Mug 1</b>	3.36	3.53	3.79	9.51	10.20	10.99
<b>Mug 2</b>	3.41	3.34	3.19	9.29	10.10	10.86
<b>Mug 3</b>	3.34	3.67	3.97	9.13	10.89	12.06
<b>Mug 4</b>	3.08	3.49	3.65	8.84	10.19	10.97
<b>Mug 5</b>	3.99	3.81	3.76	8.42	9.34	9.42
<b>Mug 6</b>	3.85	3.05	3.62	8.35	7.86	9.37
<b>Mug 7</b>	3.35	3.67	3.82	9.92	11.13	11.80
<b>Mug 8</b>	3.17	3.06	3.20	7.80	8.91	9.63
<b>Mug 9</b>	3.70	3.18	3.40	10.02	10.62	10.91
<b>Mug 10</b>	3.20	3.39	3.66	8.59	10.12	10.86
Mean	3.45	3.42	3.61	8.99	9.94	10.69
RSD	8.8%	7.7%	7.3%	8.0%	9.9%	8.7%

**C. Stability study at 40°C, 20°C and 4°C (RT) for one and/or 13 weeks**  
all values in mg kg<sup>-1</sup> (REF, reference)

Melamine				
T (°C)	4 °C (Ref.)	40 °C	20 °C	4 °C
weeks	T <sub>0</sub>	1	13	13
	2.52	2.53	2.52	2.53
	2.52	2.52	2.53	2.53
	2.53	2.51	2.53	2.53
	2.53			
	2.52			
	2.53			
	2.52			
	2.53			
	2.51			
	2.52			
Mean	2.52	2.52	2.53	2.53
Y <sub>0</sub> -Y <sub>end</sub>		0.001	0.003	0.007
0.3 σ <sub>pt</sub>		0.114		
Stable <sup>a</sup> ?		yes	yes	yes

Formaldehyde				
T (°C)	4 °C (Ref.)	40 °C	20 °C	4 °C
weeks	T <sub>0</sub>	1	13	13
	12.52	12.52	12.65	12.54
	12.54	12.48	12.64	12.57
	12.50	12.50	12.66	12.59
	12.48			
	12.48			
	12.54			
	12.52			
	12.52			
	12.54			
	12.53			
Mean	12.52	12.50	12.65	12.56
Y <sub>0</sub> -Y <sub>end</sub>		0.019	-0.132	-0.046
0.3 σ <sub>pt</sub>		0.563		
Stable <sup>a</sup> ?		yes	yes	yes

<sup>a</sup> Stability criteria according to ISO 13528:2022 § B.5. ( $|Y_0 - Y_{end}| < 0.3 \sigma_{pt}$ )

## Annex 5: Results for melamine in FS.B (test item 1)

Assigned range:  $x_{pt} = 2.528 \pm 0.0069$  ( $k = 2$ );  $\sigma_{pt} = 0.379$ , all values in  $\text{mg kg}^{-1}$

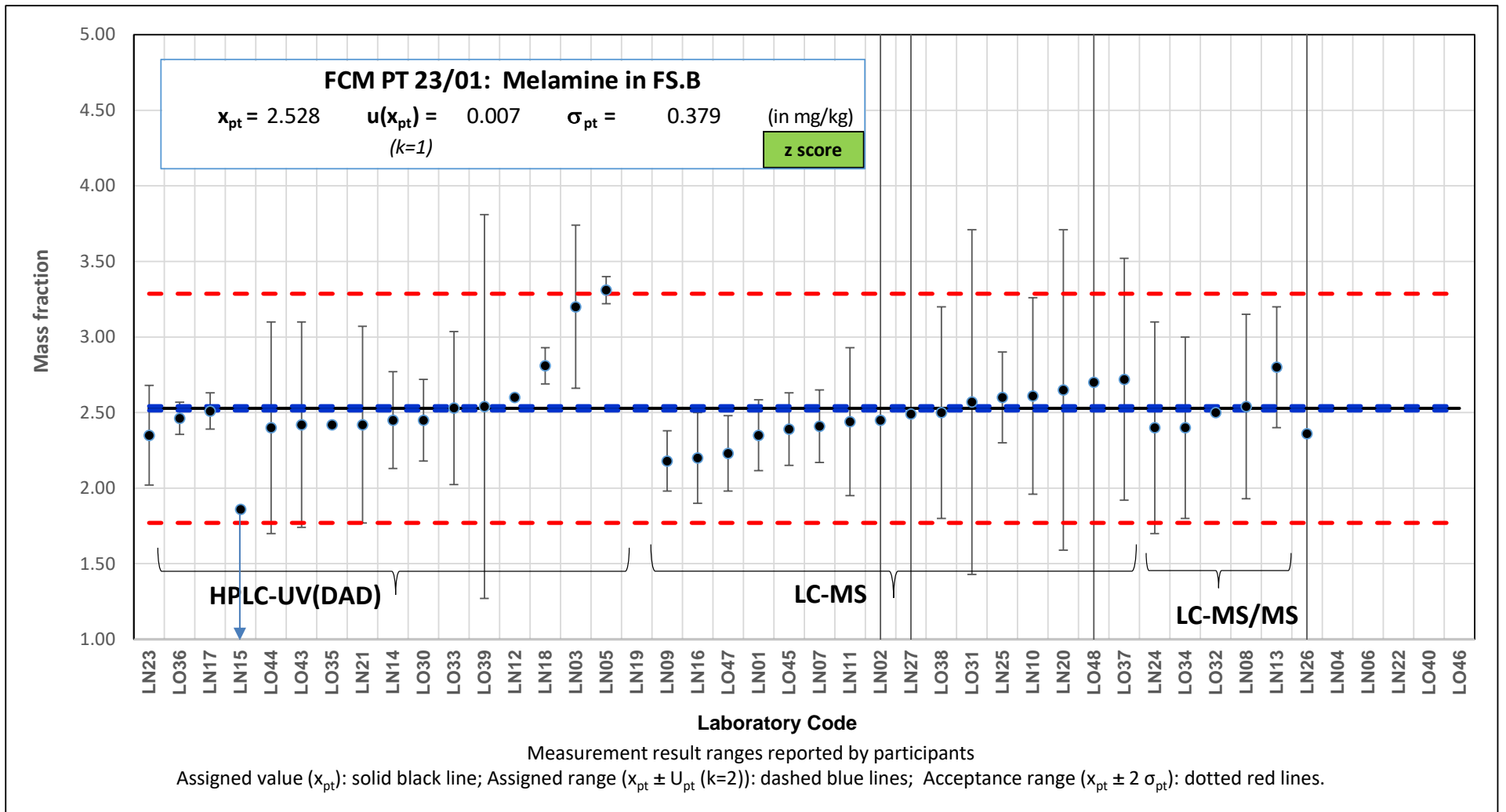
LabCode	$x_i$	$\pm$	$k$	Technique	Z score	$\zeta$ score	MU.
LN01	2.35	0.235	1.73	LC-MS	-0.47	-1.31	a
LN02	2.45	21	2	LC-MS	-0.21	-0.01	c
LN03	3.2	0.54	2	HPLC-UV	1.77	2.49	a
LN04							
LN05	3.31	0.09	2	HPLC-UV	2.06	17.18	a
LN06							
LN07	2.41	0.24	2	LC-MS	-0.31	-0.98	a
LN08	2.54	0.61	2	LC-MS/MS	0.03	0.04	a
LN09	2.18	0.2	2	LC-MS	-0.92	-3.47	a
LN10	2.61	0.65	2	LC-MS	0.22	0.25	a
LN11	2.44	0.49	2	LC-MS	-0.23	-0.36	a
LN12	2.6			HPLC-UV	0.19	10.51	np
LN13	2.8	0.4	2	LC-MS/MS	0.72	1.36	a
LN14	2.45	0.32	2	HPLC-UV	-0.21	-0.49	a
LN15	< 1.86			HPLC-UV			
LN16	2.2	0.3	2	LC-MS	-0.86	-2.18	a
LN17	2.51	0.12	2	HPLC-DAD	-0.05	-0.30	a
LN18	2.81	0.12	2	HPLC-UV	0.74	4.67	a
LN19	0.026	0.0005	2	LC-MS	-6.60	-364.40	a
LN20	2.65	1.06	2	LC-MS	0.32	0.23	c
LN21	2.42	0.65	1.73	HPLC-UV	-0.28	-0.29	c
LN22							
LN23	2.35	0.33	2	HPLC-DAD	-0.47	-1.08	a
LN24	2.4	0.7	2	LC-MS/MS	-0.34	-0.37	a
LN25	2.6	0.3	2	LC-MS	0.19	0.48	a
LN26	2.36	21	1.73		-0.44	-0.01	c
LN27	2.49	30	2	LC-MS	-0.10	0.00	c
LO30	2.45	0.27	2	HPLC-UV	-0.21	-0.58	a
LO31	2.57	1.14	1.64	LC-MS	0.11	0.06	c
LO32	2.5			LC-MS/MS	-0.07	-4.07	np
LO33	2.53	0.506	2	HPLC-UV	0.01	0.01	a
LO34	2.4	0.6	2	LC-MS/MS	-0.34	-0.43	a
LO35	2.42			HPLC-UV	-0.28	-15.73	np
LO36	2.462	0.106	2	HPLC-DAD	-0.17	-1.23	a
LO37	2.72	0.8	2	LC-MS	0.51	0.48	a
LO38	2.5	0.7	2	LC-MS	-0.07	-0.08	a
LO39	2.54	1.27	2	HPLC-UV	0.03	0.02	c
LO40							
LO43	2.42	0.68	2	HPLC-UV	-0.28	-0.32	a
LO44	2.4	0.7	2	HPLC-UV	-0.34	-0.37	a
LO45	2.39	0.24	2	LC-MS	-0.36	-1.15	a
LO46							
LO47	2.23	0.25	2	LC-MS	-0.79	-2.38	a
LO48	2.7	20	2	LC-MS	0.45	0.02	c

Performance (z,  $\zeta$ ): Satisfactory (green); Questionable (yellow); Unsatisfactory (Red)

MU – “a”  $u(x_{i,rel}) \leq u(x_{pt,rel}) \leq \sigma_{pt,rel}$ ;

“b”  $u(x_{i,rel}) < u(x_{pt,rel})$ ;

“c”  $u(x_{i,rel}) > \sigma_{pt,rel}$ ; “np” not provided



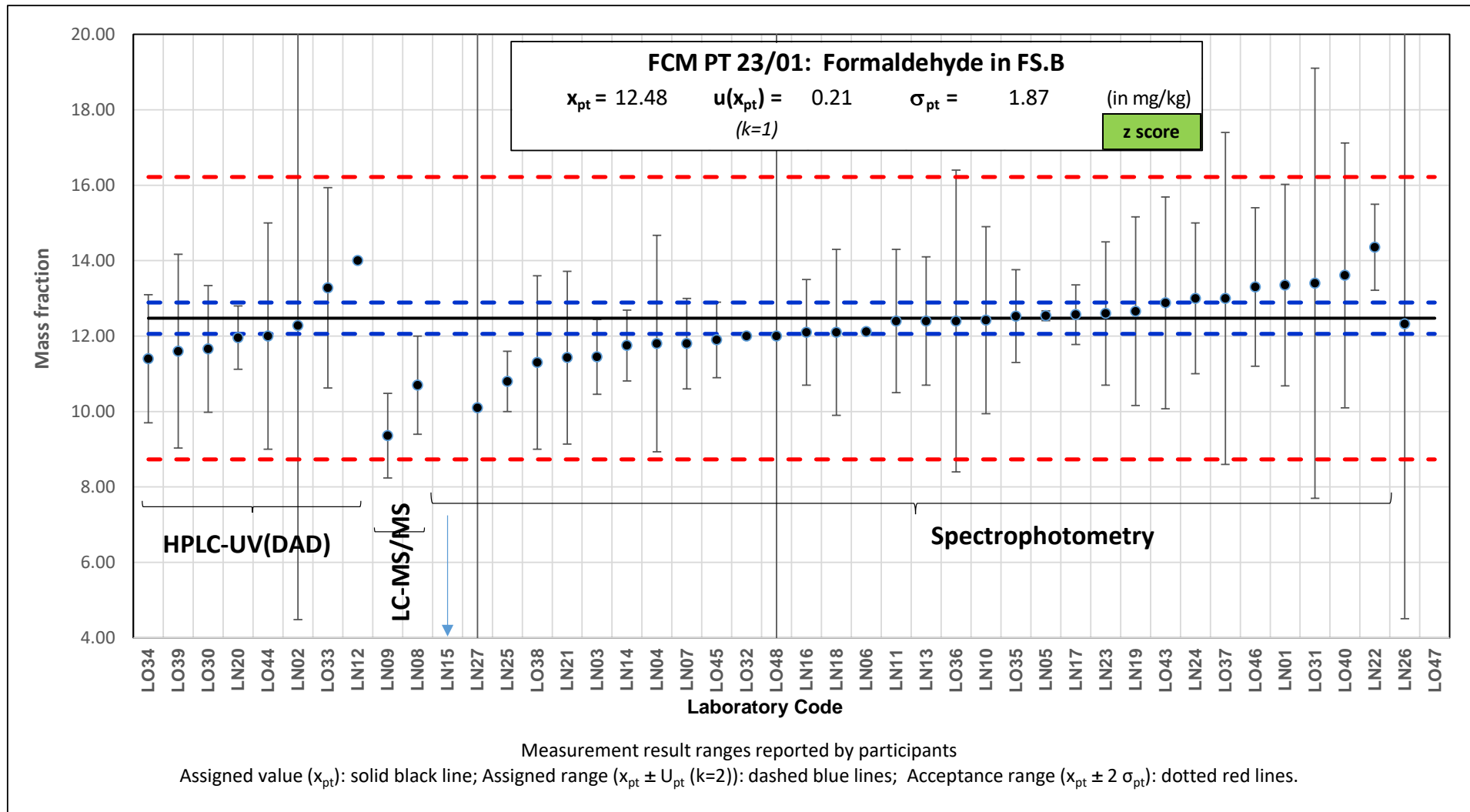
## Annex 6: Results for formaldehyde in FS.B (test item 1)

Assigned range:  $x_{pt} = 12.48 \pm 0.41$  ( $k = 2$ );  $\sigma_{pt} = 1.87$  (all values in mg kg<sup>-1</sup>)

LabCode	$x_i$	$\pm$	$k$	Technique	Z score	$\zeta$ score	MU.
LN01	13.35	2.67	1.73	Spectroph.	0.47	0.56	a
LN02	12.28	7.8	2	HPLC-UV	-0.10	-0.05	c
LN03	11.45	0.99	2	Spectroph.	-0.55	-1.91	a
LN04	11.8	2.87	2	Spectroph.	-0.36	-0.47	a
LN05	12.54	0.13	2	Spectroph.	0.03	0.30	b
LN06	12.12	0.03	2	Spectroph.	-0.19	-1.71	b
LN07	11.8	1.2	2	Spectroph.	-0.36	-1.06	a
LN08	10.7	1.3	2	LC-MS/MS	-0.95	-2.60	a
LN09	9.36	1.12	2	LC-MS	-1.66	-5.22	a
LN10	12.42	2.48	2	Spectroph.	-0.03	-0.04	a
LN11	12.4	1.9	2	Spectroph.	-0.04	-0.08	a
LN12	14			HPLC-UV	0.81	7.37	np
LN13	12.4	1.7	2	Spectroph.	-0.04	-0.09	a
LN14	11.75	0.94	2	Spectroph.	-0.39	-1.41	a
LN15	1.15	0.23	2	Spectroph.	-6.05	-47.85	a
LN16	12.1	1.4	2	Spectroph.	-0.20	-0.51	a
LN17	12.57	0.79	2	Spectroph.	0.05	0.21	a
LN18	12.1	2.2	2	Spectroph.	-0.20	-0.34	a
LN19	12.66	2.5	2	Spectroph.	0.10	0.15	a
LN20	11.96	0.84	2	HPLC-UV	-0.28	-1.10	a
LN21	11.43	2.29	1.73	Spectroph.	-0.56	-0.78	a
LN22	14.357	1.14	2	Spectroph.	1.01	3.10	a
LN23	12.6	1.9	2	Spectroph.	0.07	0.13	a
LN24	13	2	2	Spectroph.	0.28	0.51	a
LN25	10.8	0.8	2	Spectroph.	-0.90	-3.72	a
LN26	12.32	7.81	1.73		-0.08	-0.03	c
LN27	10.1	10	2	Spectroph.	-1.27	-0.47	c
LO30	11.66	1.68	2	HPLC-UV	-0.44	-0.94	a
LO31	13.4	5.7	1.64	Spectroph.	0.49	0.27	c
LO32	12			Spectroph.	-0.25	-2.30	np
LO33	13.28	2.656	2	HPLC-UV	0.43	0.60	a
LO34	11.4	1.7	2	HPLC-DAD	-0.57	-1.23	a
LO35	12.53	1.23	2	Spectroph.	0.03	0.08	a
LO36	12.4	4	2	Spectroph.	-0.04	-0.04	c
LO37	13	4.4	2	Spectroph.	0.28	0.24	c
LO38	11.3	2.3	2	Spectroph.	-0.63	-1.01	a
LO39	11.6	2.57	2	HPLC-UV	-0.47	-0.67	a
LO40	13.61	3.51	2	Spectroph.	0.61	0.64	a
LO43	12.88	2.81	2	Spectroph.	0.22	0.29	a
LO44	12	3	2	HPLC-UV	-0.25	-0.31	a
LO45	11.9	1	2	Spectroph.	-0.31	-1.06	a
LO46	13.3	2.1	2	Spectroph.	0.44	0.77	a
LO47							
LO48	12	10.3	2	Spectroph.	-0.25	-0.09	c

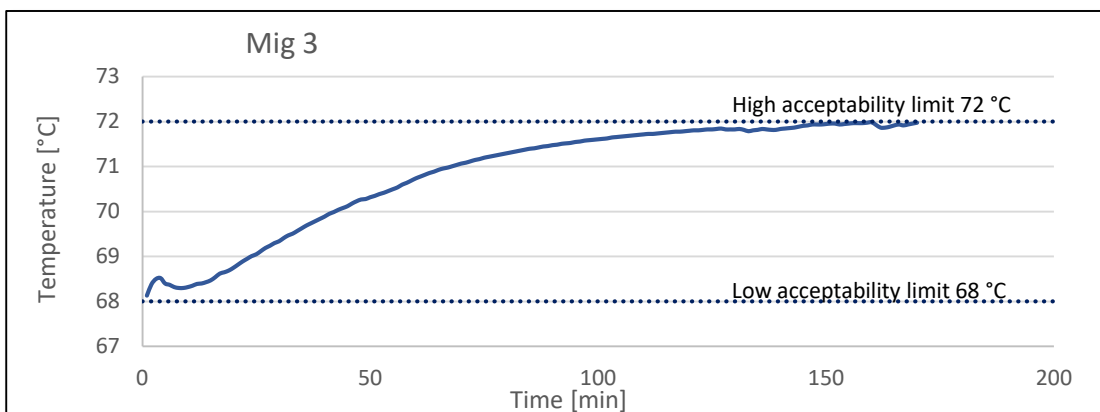
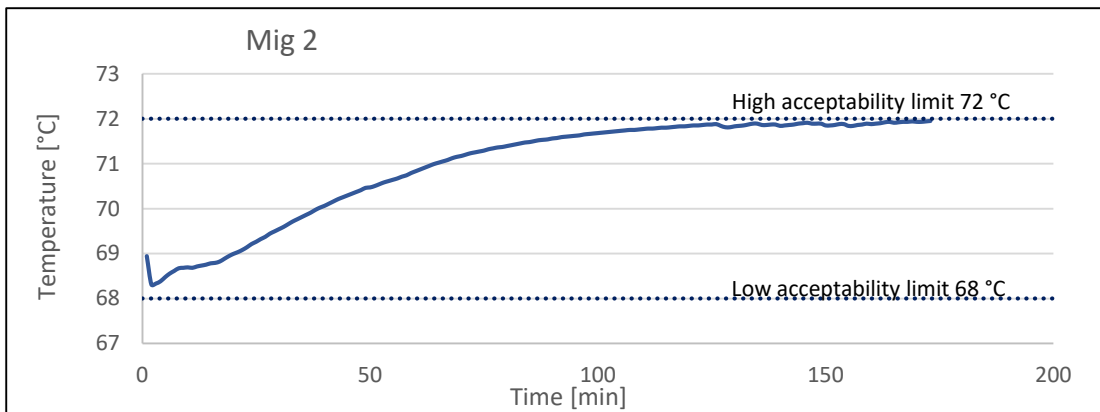
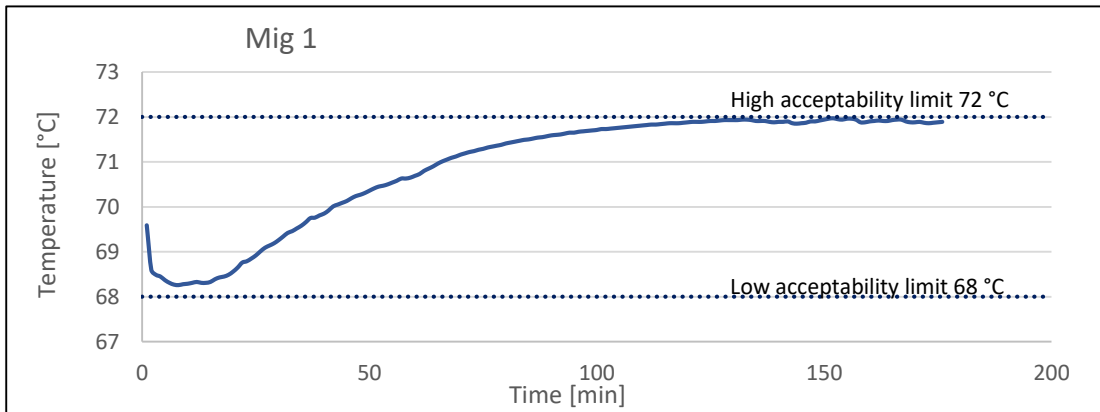
Performance (z,  $\zeta$ ): Satisfactory (green); Questionable (yellow); Unsatisfactory (Red)

MU – “a”  $u(x_{i,rel}) \leq u(x_{pt,rel}) \leq \sigma_{pt,rel}$ ; “b”  $u(x_{i,rel}) < u(x_{pt,rel})$ ; “c”  $u(x_{i,rel}) > \sigma_{pt,rel}$ ; “np” not provided



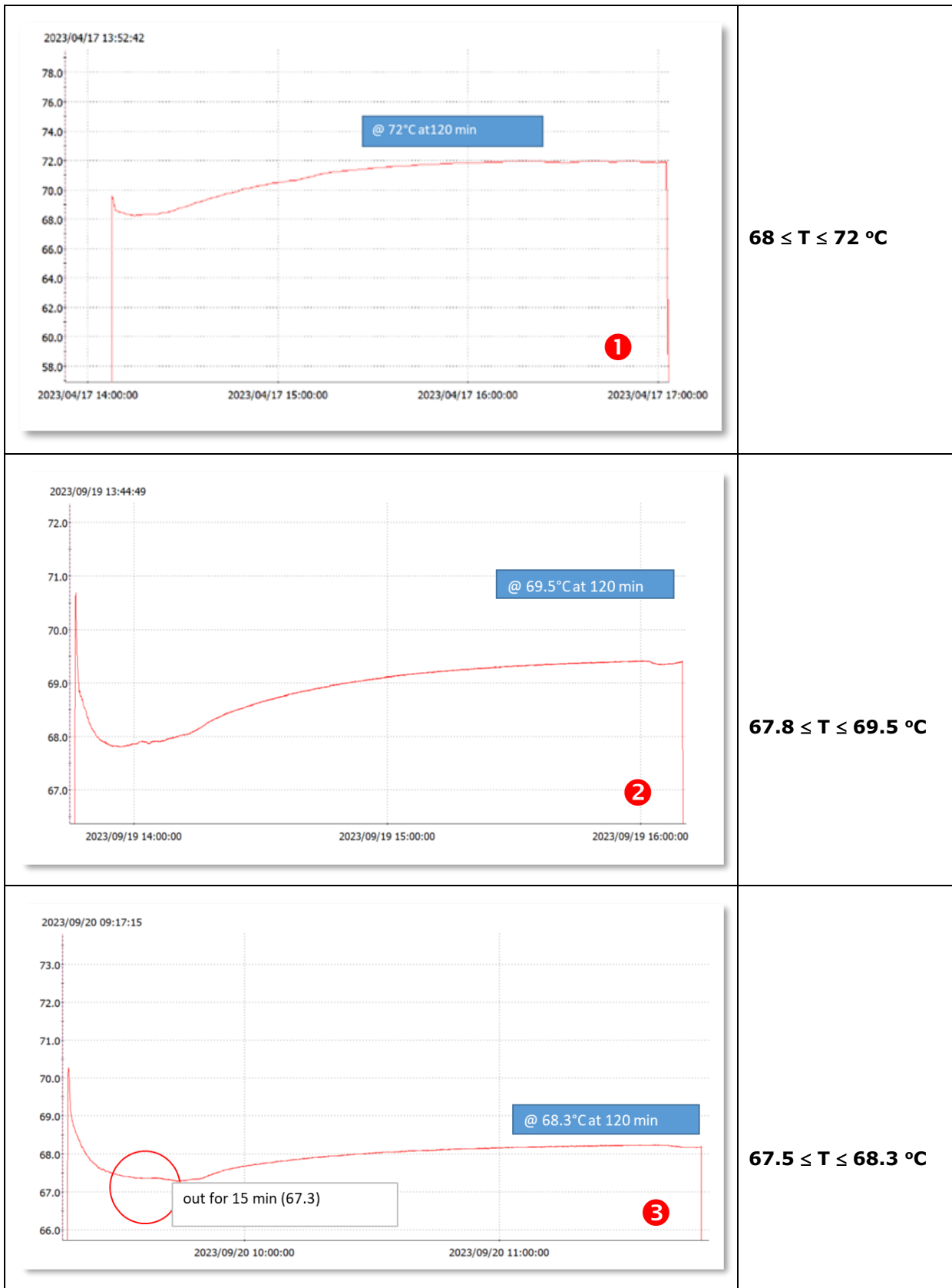
## Annex 7: Repeated temperature profiles

(3 consecutive migrations between 68 and 72 °C (Profile 1) performed by the EURL on a mug (test item 2))



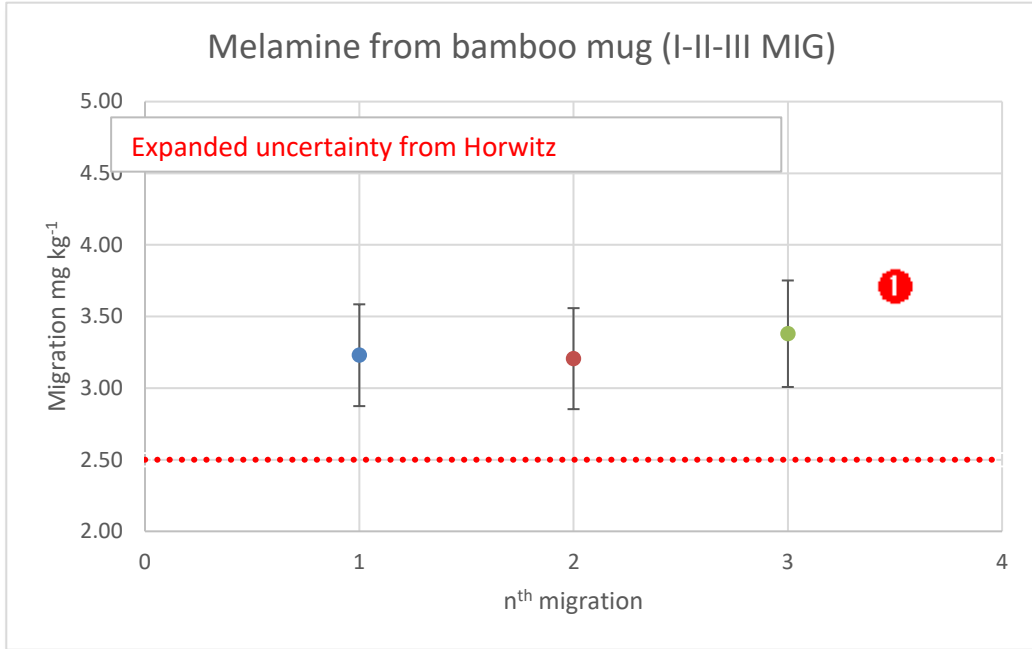
## Annex 8: Three different temperature profiles

within the recommended temperature range of  $70 \pm 2 \text{ }^\circ\text{C}$ ,  
obtained by the EURL for different mugs (test item 2)

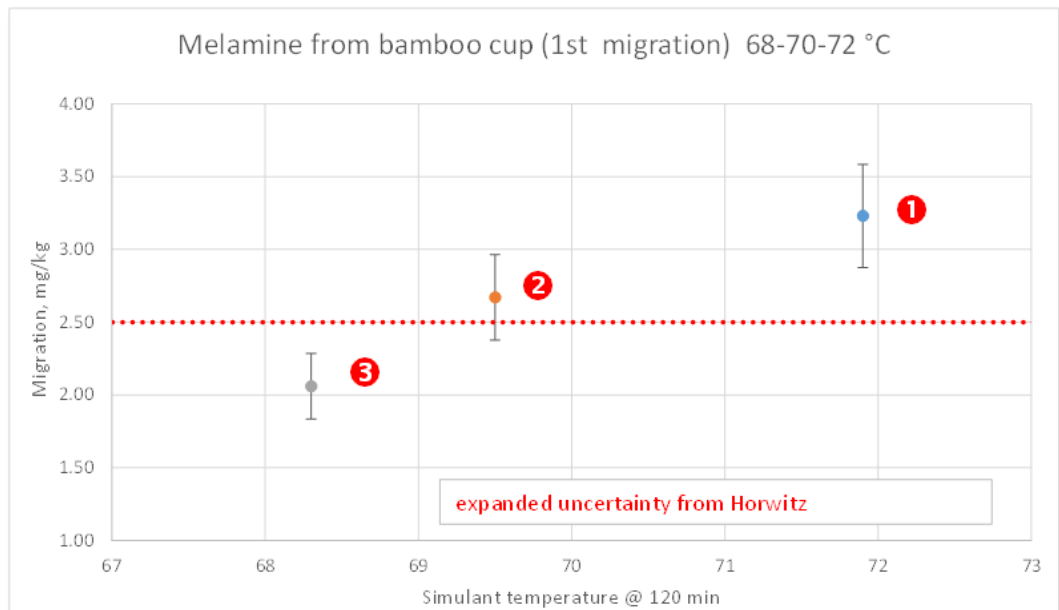


## Annex 9: Melamine results obtained by the EURL

- A.** Three consecutive migrations performed applying the same temperature profile (see Annex 8, Profile 1). All migrations are above the SML; while the reported ranges have overlapping uncertainties, demonstrating the stability of the test item.

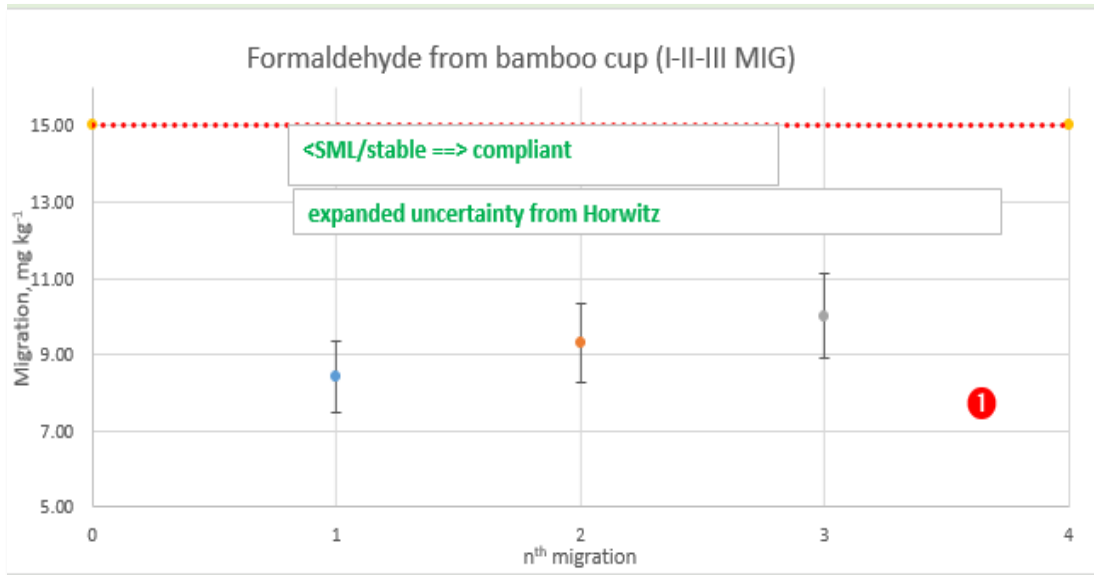


- B.** First migrations of three different mugs performed at three different temperature profiles (see Annex 8, Profiles 1, 2 and 3). Migrated levels increase with increasing temperature ranges; those obtained for temperatures ranging from 67.5 and 68.3 °C, are below the SML

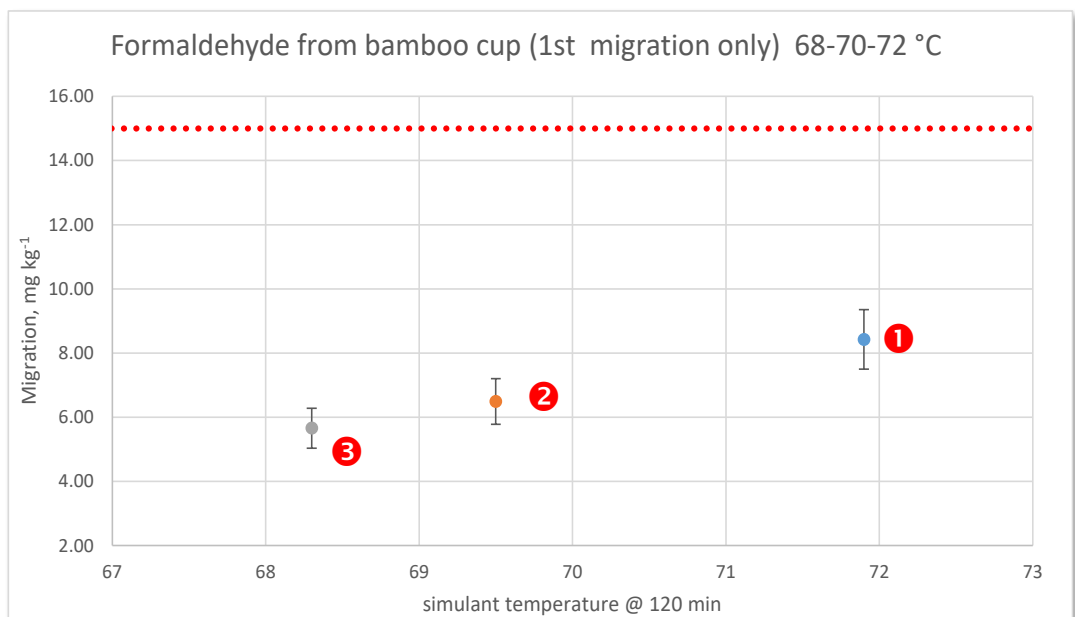


**Annex 10: Formaldehyde migration results obtained by the EURL**

**A.** Three consecutive migrations performed applying the same temperature profile (see Annex 7, Profile 1). All migrations are below the SML; and the reported ranges have overlapping uncertainties, demonstrating the stability of the test item.



**B.** First migrations of three different mugs performed at three different temperature profiles (see Annex 8, Profiles 1, 2 and 3). Migrated levels increase with increasing temperature ranges.



## Annex 11: Reported results for three consecutive migrations (m1, m2, m3) of melamine in food simulant B from test item 2 (MUG), expressed in mg kg<sup>-1</sup>

Lab	MUG 1						MUG 2						MUG 3						Lab statement	Stable	<SML	coherent	T_profile
	m1	m2	m3	U(m1) k=2	k	Rsu k=1	m1	m2	m3	U(m1) k=2	k	Rsu k=1	m1	m2	m3	U(m1) k=2	k	Rsu k=1					
LN01	2.41	2.43	2.72	0.241	1.73	5.8%	2.05	2.11	2.26	0.205	1.73	5.8%	2.59	2.83	2.9	0.259	1.73	5.8%	NC	yes	no	yes	S
LN02	2.24	2.31	2.37	0.235	1	10.5%	2.41	2.41	2.2	0.253	1	10.5%	1.9	2.3	2.39	0.200	1	10.5%	C	yes	yes	yes	Q
LN03	1.09	1	0.85	0.17	2	7.8%	1.16	1.53	1.07	0.21	2	9.1%	1.05	1.18	0.91	0.17	2	8.1%	C	yes	yes	yes	U
LN04	--																		not tested				U
LN05	2.803	2.826	3.528	np			3.086	3.748	3.424	np			4.037	3.047	3.822	np			NC	?	?	?	S
LN06	--																		not tested				S
LN07	2.13 ↗	2.63	2.6	0.26	2	6.1%	2.05	2.2	2.01	0.25	2	6.1%	1.95	2.33	2.01	0.23	2	5.9%	NC	no	yes	yes	S
LN08	2.07	1.88 ↗	2.96	0.5	2	12.1%	1.4	1.46 ↗	2.45	0.34	2	12.1%	1.82	2.02	2.8	0.44	2	12.1%	NC	no	yes	yes	Q
LN09	1.25	0.63 ↗	0.73	0.08	2	3.2%	1.07	0.88	0.99	0.09	2	4.2%	0.99	0.71 ↗	0.9	0.08	2	4.0%	C	no	yes	no	U
LN10	1.6	1.6	1.9	0.41	2	12.8%	2.3	2	2.3	0.58	2	12.6%	1.6	1.3	1.5	0.4	2	12.5%	C	yes	yes	yes	U
LN11	2.12	2.62	3	0.43	2	10.1%	2.61	2.62	3.2	0.53	2	10.2%	1.82	1.8	2.13	0.37	2	10.2%	NC	yes	no	yes	U
LN12	1.4	2.2	1.8	np			1.6	1.6	2.1	np			1.9	1.6	2	np			C	?	yes	?	Q
LN13	3.4	3.3	3.6	1	2	15%	3.1	2.7	3.2	0.9	2	15%	3.8	3.3	3.5	1.1	2	14.5%	NC	yes	no	yes	S
LN14	2.76	2.43	2.82	0.75	2	13.6%	3.24	2.97	3.22	0.86	2	13.3%	3.17	3.1	3.36	0.85	2	13.4%	NC	yes	no	yes	Q
LN15	<1.86	<1.86	<1.86	np			<1.86	<1.86	<1.86	np			<1.86	<1.86	<1.86	np			NC	yes	yes	no	S
LN16	1.4	0.4	<0.25	0.2	2	7.1%	0.9	0.3	<0.25	0.1	2	5.6%	1	0.4	0.3	0.1	2	5.0%	C	yes	yes	yes	S
LN17	0.95	0.35 ↗	1.37	0.05	2	2.6%	1.05	0.28 ↗	1.48	0.06	2	2.9%	0.83	0.58 ↗	1.28	0.05	2	3.0%	NC	no	yes	yes	Q
LN18	3.39	3.17	2.89	0.3	2	4.4%	3.37	3.21	2.81	0.29	2	4.3%	3.68	3.07	2.74	0.32	2	4.3%	NC	yes	no	yes	S
LN19	0.92	0.78	0.63	0.19	2	10.3%	0.77	1.06	0.84	0.15	2	9.7%	1.27	0.96	0.74	0.25	2	9.8%	C	yes	yes	yes	S
LN20	1.05	1.25	1.24	0.42	2	20%	1.84	2.15	2.09	0.74	2	20%	1.72	1.91	1.99	0.69	2	20%	C	yes	yes	yes	S
LN21	4.39	2.85	3.51	0.97	1.73	12.8%	3.11	2.44	4.2	0.88	1.73	16.4%	5.36	4.54	5.45	1.38	1.73	15%	NC	yes	no	yes	U
LN22	--																		not tested				
LN23	1.85	1.61 ↗	2.38	0.26	2	7.0%	1.41	1.84	1.83	0.28	2	9.9%	1.86	2.1 ↗	2.8	0.3	2	8.1%	NC	no	yes	yes	S
LN24	1.8	1.6	2.4	0.6	2	17%	2.5	2.8	2.6	0.9	2	18%	1.3	2.3	1.9	0.5	2	19%	C	yes	yes	yes	S
LN25	2.8	2.5	2.9	0.3	2	5.4%	2.5	2.4	2.6	0.2	2	4.0%	2.9	2.3	2.1	0.3	2	5.2%	NC	yes	no	yes	S
LN26	0.69 ↗	2.16	2.34	0.07	1.73	6.1%	0.77 ↗	1.89 ↗	2.63	0.08	1.73	6.1%	0.54 ↗	2.43	2.43	0.06	1.73	6.1%	NC	no	yes	yes	S
LN27	3.23	2.88	2.95	0.969	2	15%	1.75	2.08	2.08	0.525	2	15.0%	2.71	3.2	3.12	0.813	2	15.0%	C	yes	yes	yes	S
LO30	1.63 ↗	2.71	2.87	0.18	2	5.5%	1.09 ↗	2.02	2.01	0.12	2	5.5%	2.02 ↗	2.77	2.88	0.22	2	5.4%	NC	no	no	yes	S
LO31	1.7	1.9	2.42	0.75	1.64	27%	2.31	2.52	0.92	1.03	1.64	27%	2.07	1.55	1.61	0.92	1.64	27%	C	yes	yes	yes	S
LO32	3.3	2.3	2.9	np			3.4	3.8	3.6	np			2.3	3.7	3.5	np			NC	?	?	?	S
LO33	1.75	2.15	1.71	np			1.54	2.01	1.5	np			1.03	1.47	1.64	np			C	?	yes	?	S
LO34	2.2	2.6	3.1	0.6	2	13.6%	2.2	2.3	2.8	0.6	2	13.6%	2.5	2.4	2.6	0.6	2	12.0%	C	yes	yes	yes	S
LO35	1.55	1.82	1.76	np			1.86	1.64	1.94	np			1.52	1.32	1.39	np			C	?	yes	?	Q
LO36	1.559	1.717	1.919	0.67	2	21%	1.718	1.553	1.67	0.739	2	22%	1.557	1.67	1.869	0.67	2	22%	C	yes	yes	yes	U
LO37	2.03	1.73	2.35	0.6	2	15%	2.22	2.2	2.99	0.65	2	15%	1.52	1.68	2.24	0.45	2	15%	NC	yes	yes	no	Q
LO38	0.6	0.5	0.5	0.2	2	17%	0.8	0.9	0.7	0.3	2	19%	1.2	1	0.9	0.4	2	17%	C	yes	yes	yes	Q
LO39	1.03	0.94	1.42	0.52	2	25%	1.18	1.12	1.26	0.59	2	25%	1.72	1.38	1.48	0.86	2	25%	NC	yes	yes	no	S
LO40	--																		not tested				Q
LO43	2.21	1.93	1.88	0.63	2	14.3%	1.56	1.88	1.79	0.47	2	15%	1.32 ↗	2.39	2.27	0.41	2	16%	NC	no	yes	yes	S
LO44	0.9	0.8	1.3	0.3	2	17%	0.9	0.9	1.3	0.3	2	17%	0.8	1	1	0.2	2	12.5%	NC	yes	yes	no	Q
LO45	1.77	1.8	1.8	0.18	2	5.1%	1.29	1.23	1.34	0.13	2	5.0%	1.8	1.83	1.97	0.19	2	5.3%	C	yes	yes	yes	S
LO46	--																		not tested				
LO47	4.5	3.09	2.76	0.49	2	5.4%	4.89 ↗	13.39	5.26	0.54	2	5.5%	4.3 ↗	5.77	2.5	0.47	2	5.5%	NC	no	no	yes	S
LO48	1.2	1.6 ↗	2.9	0.24	2	10.0%	1.1 ↗	1.8	2.5	0.22	2	10.0%	1.3 ↗	2.3	2.8	0.26	2	10.0%	NC	no	yes	yes	S

## Annex 12: Reported results for three consecutive migrations (m1, m2, m3) of formaldehyde in food simulant B from test item 2 (MUG), expressed in mg kg<sup>-1</sup>

Lab	MUG 1						MUG 2						MUG 3						Lab statement	Stable	< SML	coherent	T profile
	m1	m2	m3	U(m1) k=2	k	RSD k=1	m1	m2	m3	U(m1) k=2	k	RSD k=1	m1	m2	m3	U(m1) k=2	k	RSD k=1					
LN01	8	9.28	10.12	1.6	1.73	11.6%	6.77	7.68	8.64	1.35	1.73	11.5%	7.44	8.92	9.57	1.49	1.73	11.6%	C	yes	yes	yes	S
LN02	6.54	7.9	7.9	0.26	1	3.9%	9.45	10.81	10.62	0.37	1	3.9%	7.99	9.78	10.43	0.31	1	3.9%	NC	no	yes	yes	Q
LN03	3.22	2.48	2.4	0.39	2	6.1%	2.62	4.21	2.58	0.46	2	8.8%	2.6	3.47	1.79	0.38	2	7.3%	C	no	yes	no	U
LN04	1.686	1.548	2.014	0.257	2	7.6%	1.329	1.334	1.765	0.257	2	9.7%	1.828	1.231	1.889	0.257	2	7.0%	NC	no	yes	yes	U
LN05	3.686	7.334	7.131	np			5.826	11.744	9.904	np			6.892	11.563	9.941	np			NC	?	yes	?	S
LN06	3.945	7.423	7.357	np			5.716	12.61	10.026	np			6.177	10.966	10.639	np			NC	?	yes	?	S
LN07	6.2	8.7	9.3	0.8	2	6.5%	6	7.9	8	0.8	2	6.7%	5.5	7.6	7.5	0.7	2	6.4%	NC	no	yes	yes	S
LN08	6.71	7.81	11.2	0.8	2	6.0%	3.52	4.33	6.43	0.42	2	6.0%	6.28	7.47	9.62	0.75	2	6.0%	NC	no	yes	yes	Q
LN09	3.29	2.24	3.92	0.38	2	5.8%	3.48	3.71	3.5	0.43	2	6.2%	2.34	2.41	2.8	0.3	2	6.4%	C	no	yes	no	U
LN10	5.7	6	3.6	1.1	2	9.6%	6.9	6.7	4.4	1.4	2	10.1%	7.7	7.3	5	1.5	2	9.7%	C	yes	yes	yes	U
LN11	7.4	10.1	10.8	1.2	2	8.1%	8	9.2	6.3	1.2	2	7.5%	4.6	5.7	9.8	0.7	2	7.6%	NC	no	yes	yes	U
LN12	3.2	5.3	6.6	np			5.2	5.7	6	np			6.1	5.9	6.8	np			C	?	yes		Q
LN13	10.9	11.4	11.7	3.1	2	14%	8.1	8.3	8.4	2.3	2	14%	11.4	12.2	12.2	3.3	2	14%	C	yes	yes	yes	S
LN14	8.2	9.75	10.8	1.9	2	11.6%	7.12	7.86	8.69	1.69	2	11.9%	9.3	10.95	11.75	2.12	2	11.4%	C	yes	yes	yes	Q
LN15	1.73	1.8	1.82	0.36	2	10.4%	1.62	1.89	1.56	0.34	2	10.5%	1.64	1.95	1.64	0.35	2	10.7%	NC	yes	yes	no	S
LN16	4.6	<3	<3	0.5	2	5.4%	3.1	<3	<3	0.4	2	6.5%	<3	<3	<3				C	yes	yes	yes	S
LN17	3.9	2.35	6.38	0.53	2	6.8%	3.9	1.88	6.53	0.53	2	6.8%	3.43	3.59	6.22	0.53	2	7.7%	NC	no	yes	yes	Q
LN18	12.6	13.8	12.6	2.5	2	9.9%	11.4	12.6	11.4	2.3	2	10.1%	9.6	10.8	9.6	1.9	2	9.9%	C	yes	yes	yes	S
LN19	1.78	2.54	2.81	0.35	2	9.8%	2.66	5.45	3.51	0.52	2	9.8%	2.44	4.46	2.89	0.48	2	9.8%	C	no	yes	no	S
LN20	2.83	4.11	4.28	0.85	2	15%	6.44	8.77	8.72	1.93	2	15%	5.85	8.49	8.16	1.76	2	15%	C	yes	yes	yes	S
LN21	9.33	8.69	9.89	1.86	1.73	11.5%	6.44	7.48	11.2	1.67	1.73	15.0%	13.91	15.18	16.49	3.04	1.73	12.6%	C	yes	yes	yes	U
LN22	23.10	11.44	8.51	1.14	2	2.5%	11.44	4.81	8.38	1.14	2	5.0%	15.28	11.31	8.63	1.14	2	3.7%	--	no	yes		U
LN23	9.6	10.5	11.3	3.6	2	19%	7.4	8.2	8.8	3.5	2	24%	10.2	10.9	12.4	4.6	2	23%	NC	yes	yes	no	S
LN24	4.6	5.8	4.9	1.1	2	12.0%	8.1	12	11	1.9	2	11.7%	3	7.8	5.8	0.72	2	12.0%	NC	no	yes	yes	S
LN25	8.6	8.6	9.4	0.6	2	3.5%	6.4	6.6	7.4	0.6	2	4.7%	9	8.8	8.8	0.7	2	3.9%	C	yes	yes	yes	S
LN26	1.33	6.01	7.4	0.05	1.73	2.3%	1.31	4.62	6.32	0.05	1.73	2.3%	1.67	7.24	7.9	0.07	1.73	2.3%	NC	no	yes	yes	S
LN27	6.56	7.85	7.9	0.656	2	5.0%	4.69	5.8	5.37	0.469	2	5.0%	8.2	10.2	9.88	0.82	2	5.0%	C	no	yes	no	S
LO30	5.67	9.33	9.57	0.82	2	7.2%	3.41	5.91	6.77	0.49	2	7.2%	4.94	10.44	10.81	0.71	2	7.2%	NC	no	yes	yes	S
LO31	6.64	8.7	7.46	2.86	1.64	26%	7.37	9.04	4.35	3.17	1.64	26%	7.29	8.48	6.95	3.13	1.64	26%	C	yes	yes	yes	S
LO32	11.6	9.4	10.8	np			10.6	12.1	11.9	np			7.8	11.6	11.3	np			C	?	yes	?	S
LO33	6.029	7.86	7.346	np			5.467	6.633	5.441	np			4.49	5.07	7.057	np			NC	?	yes	?	S
LO34	7.6	9.5	9.6	1.1	2	7.2%	8.4	8.7	10.2	1.3	2	7.7%	8.9	9.8	10.8	1.3	2	7.3%	C	yes	yes	yes	S
LO35	5.88	7.49	7.12	0.6	2	5.1%	3.82	4.92	5.62	0.4	2	5.2%	3.92	5.01	5.35	0.4	2	5.1%	C	no	yes	no	Q
LO36	6.6	8	8.3	2.1	2	16%	6.6	7.9	8.4	2.1	2	16%	6.6	7.9	8.3	2.1	2	16%	C	yes	yes	yes	U
LO37	7	8	10	2.4	2	17%	7	8	10	2.4	2	17%	5	6	7	1.68	2	17%	NC	?	yes	?	Q
LO38	2	2.2	3.2	np			2	2.7	3.3	np			2	2	2.4	np			NC	?	yes	?	Q
LO39	3.26	4.06	4.88	0.87	2	13.3%	3.59	4.12	4.85	0.95	2	13.2%	5.31	5.98	4.84	1.32	2	12.4%	NC	yes	yes	no	S
LO40	1.39	3.27	2.45	0.5	2	18%	1.25	2.9	2.31	0.46	2	18%	2.05	3.41	2.29	0.66	2	16%	NC	no	yes	yes	Q
LO43	9.24	10.01	10.44	2.1	2	11.4%	6.41	8.38	8.21	1.55	2	12.1%	5.74	10.54	10.12	1.41	2	12.3%	NC	no	yes	yes	S
LO44	4.4	4.7	7.6	0.9	2	10.2%	2.4	3.6	4.7	0.5	2	10.4%	4.3	5.2	5.2	0.9	2	10.5%	NC	no	yes	yes	Q
LO45	5.3	6.1	6.3	0.5	2	4.7%	4.5	5	5.2	0.4	2	4.4%	5.2	6.1	6.6	0.5	2	4.8%	NC	no	yes	yes	S
LO46	7.58	5.74	10.1	1.7	2	11.2%	11.4	8.88	14	2.4	2	10.5%	11	8.05	12.5	2.1	2	9.5%	C	no	yes	no	S
LO47	--						--						--						not tested				
LO48	10	12	14	1.03	2	5.2%	7	9	9	0.721	2	5.2%	9	13	12	0.927	2	5.2%	NC	no	yes	yes	S

## **Annex 13: Results of the questionnaire**

LC Code	Laboratory status	Compliance statement regarding melamine	Justification	Compliance statement regarding formaldehyde	Justification	Accreditation for melamine and formaldehyde in food simulant B?
LN01	NRL	non compliant	The third test of mug 3 gave a result of $2,90 \pm 0,290$ mg/kg melamine (FCM No. 239) and is above the specific migration limit of 2,5 mg/kg food or simulant given in the union list. Therefore, the whole test item 2 is non-compliant.	compliant	The apparent increase in formaldehyde migration from the first to the second and third migration result in all mugs is insufficiently verifiable with the given measurement uncertainty. Therefore, for official control, non-compliance cannot be proven based on these results. However, from the point of view of the BO, compliance cannot be proven either!	Yes, for both
LN02	NRL	compliant	$M1 > M2$ ; $M2 > M3$ and $M1 > M3$ ; $M3 < SML$	non-compliant	$M2 > M1$ and $M3 > M1$ ;	Yes, for both
LN03	NRL	compliant	(1) The mean levels of migration from test Item 2 (from all 3 mugs) in mg/kg are as follows: $MIG1 = 1.10 \pm 0.18$ ; $MIG2 = 1.24 \pm 0.21$ ; $MIG3 = 1.02 \pm 0.17$ . All of them are below the SML (2.5 mg/kg). (2) Migration is above the LOD in any of the three migration tests; $MIG1 < MIG2 > MIG3$ ; $MIG2$ is not significantly higher than $MIG1$ ( $\text{zeta} < 2$ ); the stability of the material is sufficient.	compliant	(1) The mean levels of migration from test Item 2 (from all 3 mugs) in mg/kg are as follows: $MIG1 = 2.81 \pm 0.41$ ; $MIG2 = 3.39 \pm 0.0.50$ ; $MIG3 = 2.26 \pm 0.32$ . All of them are below the SML (15 mg/kg). (2) Migration is above the LOD in any of the three migration tests; $MIG1 < MIG2 > MIG3$ ; $MIG2$ is not significantly higher than $MIG1$ ( $\text{zeta} < 2$ ); the stability of the material is sufficient.	Yes, for both
LN04	NRL	compliant	Melamine is not measured.	non-compliant	Migration 3 is bigger than migration 2.	Yes, for FA
LN05	NRL, OCL	non compliant	$MIG3 > SML$ and "Insufficient Stability" e.g. $MIG2 > MIG1$ or/and $MIG3 > MIG2$ or/and $MIG3 > MIG1$	non-compliant	Although $MIG3 < SML$ the Stability of the Material is Insufficient. $MIG2 > MIG1$ and $MIG1 < MIG3 < MIG2$	Yes, for FA
LN06	NRL, OCL	non compliant	$MIG3 > SML$ and "Insufficient Stability" e.g. $MIG2 > MIG1$ or/and $MIG3 > MIG2$ or/and $MIG3 > MIG1$	non-compliant	Although $MIG3 < SML$ the Stability of the Material is Insufficient. $MIG2 > MIG1$ and $MIG1 < MIG3 < MIG2$	Yes, for FA
LN07	NRL	non compliant	The stability of the material shall be considered insufficient. The second migration test exceeds the level observed in the first test - $MIG1 < MIG2$ .	non-compliant	The stability of the material shall be considered insufficient. The second migration test exceeds the level observed in the first test - $MIG1 < MIG2$ . The third migration test is approx. at the same level observed in the second test.	Yes, for MEL;
LN08	NRL	non compliant	Compliant with SML but non compliant with requirement of stability of material. Migration test of cup 2 resulted in non compliance with stability. See used rule under point 22.	non-compliant	Compliant with SML but non compliant with requirement of stability of material. Migration tests of all three cups resulted in non compliance with stability. See used rule under point 22.	Yes, for both
LN09	NRL, OCL	compliant	Result below SML. Stability OK. $M3 > M2$ but not significantly when taking MU into account	compliant	Result below SML. Stability OK. $M3 > M2$ but not significantly when taking MU into account	Yes, for FA
LN10	NRL	compliant	the amount of migration and stability are ok	compliant	the amount of migration and stability are ok	Yes, for both
LN11	NRL	non compliant	The third migration for the second mug is over the SML of 2.5 mg/kg ( $3.20 \pm 0.64$ mg/kg)	non-compliant	The stability is insufficient for mugs 1 and 3 : the migration increases between the first and third tests (mug 1: $7.4 \pm 1.2 < 10.8 \pm 1.7$ - mug 3: $4.6 \pm 0.7 < 9.0 \pm 1.4$ )	Yes, for FA
LN12	NRL	compliant	the values are stable and under the specific migration limit	compliant	the values are stable and under the specific migration limit	Yes, for both
LN13	NRL	non compliant	$MIG3 > SML$ for 2 out of 3 mugs -> non-compliant. Compliant acc. to stability rule. Applying lab's MU instead of Horwitz would result in compliant mugs.	compliant	$MIG3 < SML$ and compliant acc. to stability rule.	Yes, for both
LN14	NRL	non compliant	The migration of melamine in the 3rd migration test was found to exceed the SML of 2.5 mg/kg for 2 out of the 3 subsamples tested. The relevant criterion for non-compliance is: $(m3 - SML) / (u(m3)) > 1.64$ . The Horwitz equation was used to calculate the measurement uncertainty.	compliant	For all the subsamples tested: The migration of formaldehyde in the 3rd migration test was lower than the SML of 15 mg/kg. The migration from the first to the third migration test did not increase significantly. Regarding the stability of the material, the criterion for compliance is: $(mj - mi) / ((u(mj) + u(mi))) < 1.64$ . The Horwitz equation was used to calculate measurement uncertainties.	Yes, for both
LN15	NRL	non compliant	The result is below our LOQ value, LOQ is 1,86mg/kg. Formaldehyde leaching stability of the sample: $M1 > M2 < M3$	non-compliant	$M1 > M2 < M3$	Yes, for both

LC Code	Laboratory status	Compliance statement regarding melamine	Justification	Compliance statement regarding formaldehyde	Justification	Accreditation for melamine and formaldehyde in food simulant B?
LN16	NRL	compliant	Sample complies with Commission Regulation (EU) 2020/1245 as their is no increase between extractions	compliant	Sample complies with Commission Regulation (EU) 2020/1245 as their is no increase between extractions	Yes, for both
LN17	NRL	non compliant	According to Reg (EU) 2020/1245 the samples are not compliant because MIG3 is higher than MIG2 and MIG1	non-compliant	According to Reg (EU) 2020/1245 the samples are not compliant because MIG3 is higher than MIG2 and MIG1	Yes, for both
LN18	NRL	non compliant	The stability of the material is sufficient because in any of the three migration tests, the migration does not increase from the first migration test to the third migration test $(m_{x+1} - m_x > 1.64 \cdot u \rightarrow (m_{x+1} - m_x) / (u_{x+1} + u_x) < 1.64)$ , and the specific migration limit is exceeded in the third test $(m_3 - 1.64 \cdot u_3) > ML \rightarrow ((m_3 - ML) / u_3 > 1.64)$ .	compliant	The stability of the material is sufficient because in any of the three migration tests, the migration does not increase from the first migration test to the third migration test $(m_{x+1} - m_x > 1.64 \cdot u \rightarrow (m_{x+1} - m_x) / (u_{x+1} + u_x) < 1.64)$ , and the specific migration limit is not exceeded in the third test $(m_3 - 1.64 \cdot u_3) > ML \rightarrow ((m_3 - ML) / u_3 < 1.64)$ .	Yes, for FA
LN19	NRL	compliant	below MRL and no increase	compliant	below MRL and no increase	Yes, for both
LN20	NRL	compliant	All migrations for all 3 mugs are below 2.5 mg/kg	compliant	All migrations are below 15 mg/kg	Yes, for FA
LN21	NRL	non compliant	Because the average of the 3 MUGs for MIG3 > SML + U	compliant	Because the average of the 3 MUGs for MIG3 < or = SML+U; also there are no statistically differences between averages of MIG1 and MIG2, MIG2 and MIG3, MIG1 and MIG3	No
LN22						
LN23	NRL	non compliant	Item 2 doesn't meet requirements according Commission Regulation (EU) 2020/1245 - Annex V Chapter 2 - 2.1.6.	non-compliant	Item 2 doesn't meet requirements according Commission Regulation (EU) 2020/1245 - Annex V Chapter 2 - 2.1.6.	Yes, for FA
LN24	NRL	compliant	$m_3 < SML$ (Mug 1 and 3) and $m_3 < SML$ for Mug 2 taking into account our own laboratory expanded MU (2.6±0.9mg/kg) or using the statistical tool from draft JRC document "Options for checking compliance ..2022", point 3.3 a). Stability rule: $m_1 > m_2$ and $m_2 > m_3$ and $m_1 > m_3$ , taking into account our own laboratory expanded MU or using the statistical tool from draft JRC document, point 3.3.b).	non-compliant	$m_3 < SML$ , but INSUFFICIENT STABILITY: Mug 1: $m_3 > m_1$ and $m_3 > m_2$ , Mug 3: $m_3 > m_1$ and $m_2 > m_1$ using the statistical tool from draft JRC 2022 document, point 3.3.b). Using our own laboratory expanded MU: Mug 1: $m_3 > m_1$ , Mug 3: $m_3 > m_1$ and $m_2 > m_1$ ; slightly different interpretation but still not compliant sample.	No
LN25	NRL	non compliant	Result in MUG1 MIG3-U (2.6 mg/kg) > SML (2.5 mg/kg).	compliant	Results in MUG1, MUG2 and MUG3 MIG3-U <= SML (15 mg/kg) and stability rule is compliant.	Yes, for both
LN26	NRL	non compliant	Taking into account cup 2-4 since cup 1 cracked during migration. Cup 2: $M_2 > M_1$ , $M_3 > M_1$ ; Cup 3: $M_2 > M_1$ , $M_3 > M_1$ ; Cup 4: $M_3 > SML$ , $M_2 > M_1$ , $M_3 > M_1$	non-compliant	Taking into account cup 2-4 since cup 1 cracked during migration. $M_2 > M_1$ , $M_3 > M_2$ , $M_3 > M_1$	No
LN27	NRL	compliant	all 3 mugs tested: non-significant increase because all values for migration 1, 2 and 3 within measurement uncertainty (±30 %). all 3 mugs tested: SML not exceeded considering the measurement uncertainty of ±30 %	compliant	mug 2 and mug 3: significant increase between migration 1 and 2, but non-significant increase for mug 1, increase remains within measurement uncertainty (±30 %)	Yes, for both
LO30	OCL	non compliant	According to the stability rule none of them are compliant. Based on the MIG3, only MUG2 is compliant. MUG1 is about 2.56 mg/kg (considering the $U_c$ ) and MUG3 about 2.57	non-compliant	Not compliant neither according to the stability rule but compliant if only the 15 mg/kg SML on the MIG3 is considered.	Yes, for both
LO31	OCL	compliant	Taking into account the measurement uncertainty, the values are below the limit value or there is no increase in migration.	compliant	Taking into account the measurement uncertainty, the values are below the limit value or there is no increase in migration.	Yes, for both
LO32	other	non compliant	migration limit for melamine according to regulation (EU) No 10/2011 exceeded. Partially increase in migration from first to third test but not consistent. Significance questionable, stability is classified as compliant.	compliant	migration limit for melamine according to regulation (EU) No 10/2011 not exceeded, partially increase in migration from first to third test but not consistent. Significance questionable, stability is classified as compliant.	Yes, for both

LC Code	Laboratory status	Compliance statement regarding melamine	Justification	Compliance statement regarding formaldehyde	Justification	Accreditation for melamine and formaldehyde in food simulant B?
LO33	other	compliant	below the SML; stability of the material pass	non-compliant	Below the SML but - Stability test of the materilas fail.	Yes, for both
LO34	OCL	compliant	SML: Migration values are exceeding the SML of 2.5 mg/kg in the 3rd migration test of each mug. However, the exceedance is not statistically significant due to the measurement uncertainty of the method (25 %) and the criteria by Horwitz; Stability rule: Migration values are generally increasing for each mug. However, the increase is	compliant	SML: Migration values are below the SML of 15 mg/kg in the 3rd migration test of each mug; Stability rule: Migration values are generally increasing for each mug. However, the increase is not statistically significant due to the criteria by Horwitz.	Yes, for both
LO35	OCL	compliant	result MIG3 below SML 2,5 mg/kg	compliant	result MIG3 below SML 15 mg/kg	Yes, for both
LO36	OCL	compliant	compliant taking into account the expanded measurement uncertainty (including measurement uncertainty of the migration)	compliant	compliant taking into account the expanded measurement uncertainty	Yes, for both
LO37	other	non compliant	insufficient stability: compliance of the material is not be established even the specific migration limit is not exceeded in any of the three tests (value of migration for third test of MUG2 is compliant with the uncertainty).	non-compliant	insufficient stability: compliance of the material is not be established even the specific migration limit is not exceeded in any of the three tests	Yes, for both
LO38	OCL	compliant		non-compliant	There is a significant increase in formaldehyde concentration in the three attacks	Yes, for both
LO39	OCL	non compliant	The requirement reported on Reg EU 10/2010 (point 2.1.6) is not satisfied. For MUG1, MUG2 and MUG3: MIG3 level exceeds MIG2 level.	non-compliant	The requirement reported on Reg EU 10/2010 (point 2.1.6) is not satisfied. For MUG1 e MUG2: MIG2 level exceeds MIG1 level and MIG3 level exceeds MIG2 level. For MUG3: MIG2 level exceeds MIG1 level.	Yes, for both
LO40	other	non compliant	test not performed	non-compliant	Specific Migration (MS) is less than LMS sed the sample is not stable: MIG3<LMS, MIG3<MIG2 e MIG2>MIG1	No
LO43	OCL	non compliant	Even if the specific migration limit is not exceeded in any of the three tests, the result is not compliant because an increase from the first migration test to the third migration test is observed, indicating an insufficient stability of the material.	non-compliant	Even if the specific migration limit is not exceeded in any of the three tests, the result is not compliant because an increase from the first migration test to the third migration test is observed, indicating an insufficient stability of the material.	No
LO44	other	non compliant	sample unstable	non-compliant	sample unstable	Yes, for both
LO45	OCL	compliant	The value at the third incubation for all mugs are <LMR and all the mugs are stable	non-compliant	The value at the third incubation for all mugs are <LMR but the mug 2 is not stable for second incubation compare to the first incubation	Yes, for both
LO46	OCL	non compliant	We not test the item	compliant	All determinations have a value less than 15 mg/kg	Yes, for FA
LO47	OCL	non compliant	Concentration for 3 mugs over SML	non-compliant	No analyzed	Yes, for MEL;
LO48	other	non compliant	MIG 3 is >SML (MUG 1 and MUG 3), and the samples are not stable as migration increases with contacts (the rule $(m_j - m_i) / [MU(m_j) + MU(m_i)] > 1.64$ (uncertainty K=1) has been used as a criterion for stability assessment).	non-compliant	Although the results obtained are <SML, the sample is not stable as migration increases with contacts (the rule $(m_j - m_i) / [MU(m_j) + MU(m_i)] > 1.64$ (uncertainty K=1) has been used as a criterion for stability assessment).	Yes, for FA

LC Code	Accreditation for the migration procedure?	Please specify	Did you pre-heat the simulant before filling the article?	Temperature of the food simulant before filling of the test items	How did you control the temperature of the food simulant during the migration experiments	Did you preheat the mugs before migration?	Volume of the food simulant used for the migration experiments	Temperature of the food simulant during the migration experiment (in oC)	Did you measure the food simulant losses	If yes, please report the volume of the losses in ml	Analytical techniques for melamine
LN01	no		YES	80 °C	calibrated datalogger	No	410 ml	will be sent via mail	Yes	MUG 1: 8.3, 7.8, 7.0 ml    MUG 2: 7.8, 7.5, 5.3 ml    MUG 3: 5.5, 6.1, 7.0 ml	LC-MS/MS
LN02	yes		YES	75 °C	calibrated datalogger	No	420 ml	See excel file attached	Yes	No loss	HPLC-UV
LN03	yes	EN 1186-3:2022	YES	72 °C	non-calibrated thermometer/datalogger	No	400 ml	70.1 +/- 1.0 oC	Yes	5 ml	HPLC-UV
LN04	no		YES	75 °C	calibrated thermometer	Yes	400 ml		No		HPLC-UV
LN05	yes		YES	85 °C	non-calibrated thermometer/datalogger	No	430 ml	70.1-71.9 oC	No		HPLC-UV
LN06	yes		YES	85 °C	non-calibrated thermometer/datalogger	No	430 ml	70.1-71.9 oC	No		HPLC-UV
LN07	yes		YES	73 °C	non-calibrated thermometer/datalogger	Yes	470 ml		Yes	10 ml	LC-MS/MS
LN08	yes		YES	72 °C	calibrated thermometer	No	450 ml	Sent by email	Yes	Weight of simulant was measured after migration and used for further calculation of result	LC-MS/MS
LN09	no	We have validated the procedure	YES	70 °C	calibrated datalogger	No	445 ml		Yes	1	LC-MS/MS
LN10	yes		YES	73,5 °C	calibrated datalogger	No	470 ml		No		LC-MS/MS
LN11	yes		YES	78 °C	calibrated datalogger	No	470 ml		No		LC-MS/MS
LN12	yes	yes by the COFRAC	YES	70°C	calibrated datalogger	No	400 ml		No		HPLC-UV
LN13	no	-	YES	72.3	calibrated datalogger	Yes	430 ml	MIG1: 69.7-71.2 °C / MIG2: 69.8-71.3 °C / MIG3: 69.1-70.8 °C	Yes	7-12 mL	LC-MS/MS
LN14	yes		YES	72°C	calibrated thermometer	No	450 ml	Temperature range: 67.5°C - 70.0°C	No		HPLC-DAD
LN15	yes	Melamine: CEN/TS 13130-27:2005, Formaldehyde: MSZ EN ISO 4614-2000(B)	YES	70°C	calibrated thermometer	No	450 ml	send by mail	Yes	3,5mL	HPLC-UV

LC Code	Accreditation for the migration procedure?	Please specify	Did you pre-heat the simulant before filling the artide?	Temperature of the food simulant before filling of the test items	How did you control the temperature of the food simulant during the migration experiments	Did you preheat the mugs before migration?	Volume of the food simulant used for the migration experiments	Temperature of the food simulant during the migration experiment (in oC)	Did you measure the food simulant losses	If yes, please report the volume of the losses in ml	Analytical techniques for melamine
LN16	yes		YES	70 oC	Other (please specify)	No	475 ml	70oC	No		LC-MS/MS
LN17	no		YES	70 °C	calibrated datalogger	No	450 ml	70 °C	No		HPLC-DAD
LN18	yes		YES	72 °C	calibrated datalogger	No	453 ml	70±2 °C	Yes	2 mL	HPLC-UV
LN19	yes		YES	/	not controlled	Yes	400 ml	70°C	Yes	between 4 and 14 ml	LC-MS/MS
LN20	yes		YES	71	calibrated thermometer	Yes	463 ml	68.1 - 70.0	No		LC-MS/MS
LN21	other, please specify below	Migration step is accredited together with the analite determination; we do not have accreditation for the migration step by it self.	YES	73 C	calibrated thermometer	No	400 ml		Yes	average of 5 mL	HPLC-UV
LN22											
LN23	yes	accreditation of procedure is part of the method	YES	73°C	calibrated thermometer	Yes	460 ml		Yes		HPLC-DAD
LN24	no		YES	72°C	calibrated datalogger	No	400 ml	Excel file sent by e-mail.	Yes	1 ml (1st migration test), 0 ml (2nd and 3rd migration test)	LC-MS/MS
LN25	yes	European Standard CEN-EN 13130-1 and Regulation (EU) No 10/2011	YES	74 °C	calibrated datalogger	No	450 ml	70 °C (with an tolerance range of 2 °C)	Yes	Looses in MIG1=5 mL, MIG2=5 mL and MIG3=10 mL	LC-MS/MS
LN26	no		YES	75 °C	calibrated datalogger	No	420 ml		Yes	No losses	LC-MS/MS
LN27	yes		YES	70 °C	calibrated datalogger	Yes	400 ml	68-71 °C	Yes	2.0-2.8 mL	LC-MS/MS
LO30	yes		YES	in an oven at 75 °C	calibrated datalogger	No	430 ml	Around 70.5°C (see the datalogger)	No		HPLC-DAD
LO31	yes		YES	75 °C	calibrated thermometer	Yes	420 ml	70 °C	No		LC-MS/MS
LO32	yes	we are flexibly accredited in the field of migration studies	YES	71 °C	calibrated thermometer	Yes	mug 1/2/3:460 ml, mug 4: 450 ml	separate Excelsheet (Mail)	Yes	10	LC-MS/MS

LC Code	Accreditation for the migration procedure?	Please specify	Did you pre-heat the simulant before filling the article?	Temperature of the food simulant before filling of the test items	How did you control the temperature of the food simulant during the migration experiments	Did you preheat the mugs before migration?	Volume of the food simulant used for the migration experiments	Temperature of the food simulant during the migration experiment (in °C)	Did you measure the food simulant losses	If yes, please report the volume of the losses in ml	Analytical techniques for melamine
LO33	yes		YES	70 °C	calibrated datalogger	No	400 ml	68,0 - 69,9 °C	No		HPLC-DAD
LO34	other, please specify below	The migration procedure is part of the accredited methods for melamine and formaldehyde.	YES	75 °C	calibrated datalogger	Yes	440 ml		No		LC-MS/MS
LO35	yes		YES	70 °C	calibrated datalogger	No	for each experiment 450 ml	the temperature is controlled in a preheated beaker	No		HPLC-DAD
LO36	yes		YES	70 °C	calibrated thermometer	No	400 ml	please see excelsheet by separate mail	No		HPLC-DAD
LO37	yes		YES	73 °C	calibrated thermometer	No	455 ml	70°C	No		LC-MS/MS
LO38	no		YES	70 °C	calibrated thermometer	No	450 ml	70°C	No		LC-MS/MS
LO39	yes		YES	70 °C	calibrated datalogger	No	400 ml	Please see attachment	No		HPLC-DAD
LO40	no		YES	70 °C	calibrated thermometer	Yes	460 ml	69.4°C	No		other, please specify below
LO43	no		YES	70 °C	calibrated datalogger	No	470 ml		No		HPLC-UV
LO44	other, please specify below	accreditating since october 2023	YES	70 °C	calibrated datalogger	No	410 ml	70°C	No		HPLC-DAD
LO45	yes		YES	72 °C	calibrated thermometer	Yes	450 ml	70 °C	No		LC-MS/MS
LO46	yes		YES	73 °C	calibrated datalogger	No	466 ml		No		other, please specify below
LO47	yes		YES	70 °C	calibrated datalogger	No	450 ml		Yes	25 ml ca.	LC-MS/MS
LO48	yes	UNE-EN 13130.1	YES	73-74°C	calibrated datalogger	Yes	450 ml	MIG 1 (Media: 70.1°C) // MIG 2 (Media: 69.8°C) // MIG 3 (Media: 70.4°C)	Yes	In case of loss of simulant, it is replaced up to the original starting volume.	LC-MS/MS

LC Code	LOQ for melamine in food simulant B?	Sample preparation for formaldehyde?	Analytical techniques for formaldehyde	LOQ for formaldehyde in food simulant B'	Time (in hours/days) between the migration experiments (MIG1, MIG2 and MIG3)	surface to volume ratio applied to the test result	Any problem encountered?
1	19	20	21	22	23	24	25
LN01	0.1 mg/kg	acetyl acetone (AA)	Spectrophotometry	2.5 mg/kg	1 day (same starting time)	concentration per area calculated using $c * 0.41 \text{ l} / 2.78 \text{ dm}^2$ and then $6 \text{ dm}^2 / 1 \text{ kg}$ applied acc. article 17(2)	Measurement uncertainty could only be entered for the first migration each, but unfortunately only as decimal, not in percent. Therefore, it does not apply to second and third migrations. The field length for Q2 and Q4 was way too short to be "as detailed as possible", as was requested in the instructions.
LN02	0.001 mg/kg	acetyl acetone (AA)	HPLC-UV	1 mg/kg	MIG 1 to MIG 2 : 10min ; MIG 2 to MIG 3 : 20 min	Yes, Volume : 0.42L ; surface 2.78 dm <sup>2</sup>	On of the 4 cups cracked during experiments. The results of the 3 other cups was taken into account
LN03	1.0 mg/kg	chromotropic acid	Spectrophotometry	1.5 mg/kg	0.25 h (15 min) after completing of the previous migration	2.58 : 0.4 = 6.45	No
LN04	-	chromotropic acid	Spectrophotometry	0,92 mg/L	All experiment were made in 2 working days.	No ratio applied.	No.
LN05	0.25 mg/Kg	acetyl acetone (AA)	Spectrophotometry	1.5 mg/Kg	1hr between MIG1/MIG2 and 18h between MIG2/MIG3	not applicable	No
LN06	0.25 mg/Kg	chromotropic acid	Spectrophotometry	1.5 mg/Kg	1hr between MIG1/MIG2 and 18h between MIG2/MIG3	not applicable	No
LN07	0.00007 mg/kg	acetyl acetone (AA)	Spectrophotometry	0.1 mg/kg	1 hour	3.07 dm <sup>2</sup> : 0.47 l	
LN08	0.25 mg/kg	acetyl acetone (AA)	LC-MS/MS	1,5 mg/kg	0.1 hour	6	Not enough space for commenting on question 1 and 3: "Although no common agreement has been reached on harmonised procedure for checking stability we are reporting according to: Each migration result has uncertainty based on our analytical method validation and a coverage factor of 2. Non compliant if $m1 < m2$ or $m2 < m3$ or $m1 < m3$ (result $\geq$
LN09	0.25 mg/kg	acetyl acetone (AA)	LC-MS/MS	1.5 mg/kg	1	6	no
LN10	0,5 mg/kg	acetyl acetone (AA)	Spectrophotometry	3 mg/kg	mig1 -> 18 h -> mig2 -> 2 h -> mig3	6 dm <sup>2</sup> /l	no
LN11	0.1 mg/kg	acetyl acetone (AA)	Spectrophotometry	1 mg/kg	22 h (MIG1 - MIG2), 0.5 h (MIG2 - MIG3)	2.96 dm <sup>2</sup> / 0.47 L	datalogger failure (migration 1 and 2) + evaporation in the mug used for the temperature monitoring (temperature underestimated, migration 3)
LN12	0,5 mg/L	2,4-dinitrophenylhydrazine	HPLC-UV	1 mg/L	4 hours between mig 1 and mig 2 and 24h between mig 2 and mig 3	real surface volume ratio	no
LN13	5 µg/L	acetyl acetone (AA)	Spectrophotometry	0.5 mg/L	MIG1 -> MIG2: 38 min / MIG2 -> MIG3: 37 min	Filling volume and calculated surface of mugs (2.62 dm <sup>2</sup> ) were applied to the raw migration results. Results were converted to kg using a surface to volume ratio of 6 dm <sup>2</sup> /kg.	Dispatch of ILC test items was delayed over the weekend.
LN14	0.25 mg/L	acetyl acetone (AA)	Spectrophotometry	1,5 mg/L	1 day (MIG1, MIG2 and MIG3 were performed in 3 consecutive days)	6 dm <sup>2</sup> /kg	No
LN15	1,86mg/kg	acetyl acetone (AA)	Spectrophotometry	0,33mg/kg	2 hours	1:2	no
LN16	0.25mg/kg	other, please specify below	Spectrophotometry	0.3 mg/kg	20 mins	Yes	No
LN17	0.25 mg/Kg	chromotropic acid	Spectrophotometry	2 mg/Kg	Tests are carried out in the same time	-	-
LN20	1.0 µg/L	acetyl acetone (AA)	HPLC-UV	0.03 mg/L	0.5 hours	6:1	No

LC Code	LOQ for melamine in food simulant B?	Sample preparation for formaldehyde?	Analytical techniques for formaldehyde	LOQ for formaldehyde in food simulant B'	Time (in hours/days) between the migration experiments (MIG1, MIG2 and MIG3)	surface to volume ratio applied to the test result	Any problem encountered?
1	19	20	21	22	23	24	25
LN18	1,6 mg/kg	acetyl acetone (AA)	Spectrophotometry	1.5 mg/kg	24 hours	6 dm <sup>2</sup> /kg	None
LN19	0.23 mg/kg	other, please specify below	Spectrophotometry	2 mg/kg	1 day at each time	0.001	none
LN20	1.0 µg/L	acetyl acetone (AA)	HPLC-UV	0.03 mg/L	0.5 hours	6:1	No
LN21	0.23 mg/kg	acetyl acetone (AA)	Spectrophotometry	1.75 mg/kg	0.25 hours	Real ratio A/V	Time to reach the test temperature due to the type of article and the volume of the test. The mugs seemed to be made with isolated material turning the transference of the temperature thru the mugs wall very difficult. The control of the 2nd test temperature was facilitated because the mugs were already warm from the 1st test.
LN22							
LN23	0.6 mg/kg	acetyl acetone (AA)	Spectrophotometry	3.00 mg/kg	MIG1 - MIG2 (15 min); MIG2-MIG3 (19 min), total time between MIG1-MIG3 (2 hours and 34 min)	2.79 square dm / 460 ml	no
LN24	0.25 mg/kg	chromotropic acid	Spectrophotometry	3 mg/kg	3 minutes	Surface to volume ratio 6 dm <sup>2</sup> / 1000 ml was applied to the test results (because volume at migration test was 400ml, surface of the sample was 2.43dm <sup>2</sup> ).	no
LN25	0.5 mg/kg	chromotropic acid	Spectrophotometry	1.4 mg/kg	24 hours between MIG1 and MIG3 (Last migration process).	S/V (dm <sup>2</sup> /kg)=6	Accidental loss of food simulant during the filling of MUG3 in MIG3.
LN26	0,001 mg/kg	acetyl acetone (AA)	HPLC-UV	1 mg/kg	Between MIG 1 and 2: 13 min. Between MIG 2 and 3: 18 h.	Yes. Surface 2,78 dm <sup>2</sup> Volume 0,42 l	One of the cups cracked during migrations.
LN27	0.1 mg/L	acetyl acetone (AA)	Spectrophotometry	0.1 mg/L	<0.25 h	2.336 dm <sup>2</sup> /400 mL	We suspect hexamethylenetetramine (HMTA) and 1,4-butanediol formal – if present – to be decomposed and forming formaldehyde during migration testing (acidic, 70 °C). An issue to be investigated in the future.
LO30	0,5 mg/kg	2,4-dinitrophenylhydrazine	HPLC/DAD	3 mg/kg	17h between MIG1&2 (consecutively performed) and MIG3. See datalogger	No because could be used by children < 3 yo. The Surface in contact is 2.94 dm <sup>2</sup> and the filling volume 430 mL	No
LO31	0,25 mg/kg	acetyl acetone (AA)	Spectrophotometry	0,13 mg/kg	MIG1 Day 1, MIG 2 and MIG 3 day 2, intervall 1 h	6 mg/dm <sup>2</sup> (results are normalised)	MUG 4 was broken, MUG 5 was also analyzed, results are much higher, see attached file via mail.
LO32	0,03 mg/l	acetyl acetone (AA)	Spectrophotometry	0,9 µg/25ml	all experiments in one day, ca. 45 min between tests	mug 1-3: 6 dm <sup>2</sup> /l, mug 4: 6,2 dm <sup>2</sup> /l	one of the cups had significantly lower migration values for melamine and formaldehyde and was therefore not included in the data submission.
LO33	1,22 mg/kg	2,4-dinitrophenylhydrazine	HPLC/DAD	0,70 mg/kg	MIG1 to MIG2: 5 min; MIG2 to MIG3: 6 min (time between the migration tests)	volume: 400 mL; contact surface: 2,92 dm <sup>2</sup> / and surface to volume ratio 6 dm <sup>2</sup> per kg of food	no
LO34	0.03 mg/kg	2,4-dinitrophenylhydrazine	HPLC/DAD	1 mg/kg	MIG1, MIG2 and MIG3 were performed in direct succession with a few minutes in between.	6.0 dm <sup>2</sup> /L	During migration a little piece of plastic broke from the inner bottom of one of the 4 mugs. Consequently, this mug was not considered for the reported migration values.
LO35	0,14 mg/kg	acetyl acetone (AA)	Spectrophotometry	0,6 mg/kg	only few minutes, all migrations within one day	6.47	no
LO36	0.25 mg/kg	acetyl acetone (AA)	Spectrophotometry	0.9 mg/kg	time between the migration experiments under 5 minutes	6 dm <sup>2</sup> /kg	no

LC Code	LOQ for melamine in food simulant B?	Sample preparation for formaldehyde?	Analytical techniques for formaldehyde	LOQ for formaldehyde in food simulant B'	Time (in hours/days) between the migration experiments (MIG1, MIG2 and MIG3)	surface to volume ratio applied to the test result	Any problem encountered?
1	19	20	21	22	23	24	25
LO37	0.25 mg/kg	chromotropic acid	Spectrophotometry	1.5 mg/kg	the three mugs were analyzed simultaneously	0.6	It's not clear to which values apply the uncertainty of the method in the 3 tests. It was decided to apply it to the first test for each mug
LO38	0.3 mg/Kg	chromotropic acid	Spectrophotometry	2.0 mg/Kg	8 days for Formaldehyde; 16 days for Melamine	0,6	
LO39	0.1 mg/Kg	2,4-dinitrophenylhydrazine	HPLC/DAD	2 mg/Kg	1 day	3.12 dm2	no
LO40	0	chromotropic acid	Spectrophotometry	1.50 mg/kg	MIG1-MIG2 30 minutes; MIG2-MIG3 two days	YES	NO
LO43	0.5 mg/Kg	chromotropic acid	Spectrophotometry	3 mg/Kg	5 minutes	6 dm2/L	No problems encountered
LO44	0,1 mg/kg	2,4-dinitrophenylhydrazine	HPLC/DAD	1,5 mg/kg	10 minutes	not applied	no
LO45	0.2 mg/Kg	chromotropic acid	Spectrophotometry	3 mg/Kg	0 hours, in successive incubations, one after the other on the same day.	6 (dm2/Kg) /6.3 (dm2/Kg) = 0.95	NO
LO46	0,0	chromotropic acid	Spectrophotometry	3 mg/kg	3 days	6 dm2/kg	No
LO47	0.05 mg/kg	2,4-dinitrophenylhydrazine	HPLC-UV	.	2 days	0.66	Some difficulties for maintaining mug temperature
LO48	LOQ = 0.1 mg/Kg	chromotropic acid	Spectrophotometry	LOQ = 3 mg/Kg	MIG 1 (25/07/23, 13:30-15:30) // MIG 2 (26/07/23, 9:00-11:00) // MIG 3 (26/07/23, 12:40-14:40)	6.0 dm2/Kg (according Reg 10/2011, article 17, articles less than 500 millilitres	No

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