

Summary report
Care products for children and kids' cosmetics
Market surveillance study conducted by
Official Cosmetics Control Laboratories

The European Network of Official Cosmetics Control Laboratories – FACT SHEET

Introduction

Since 01 January 2009, the EDQM has been engaged in efforts to strengthen consumer health protection in Europe, with a focus on the safe use and quality of cosmetics. To foster cross-border collaboration, share technical expertise and enhance quality management in each laboratory in accordance with international standards, the European network of Official Cosmetics Control Laboratories (OCCL) was set up in June 2010. 15 years of experience of the EDQM with the network of Official Medicines Control Laboratories (OMCL) were an asset in the set up phase.

In 2010, the EDQM had surveyed 18 European countries on their willingness to engage in collaboration to exchange scientific and technical expertise in the field of cosmetics testing and received significant support for building a network of official control laboratories.

In 2015, more than 30 official laboratories participate in regular network activities including laboratories in 19 Member States of the European Union. Participation is open also to other Council of Europe States having signed the Convention on the Elaboration of a European Pharmacopoeia¹.

Achievements 2011-2014:

Proficiency Testing Scheme (PTS)

Conducting PTS studies is part of a quality management programme to ensure an appropriate level of performance in the different testing laboratories. The OCCL PTS study programme 2011-2014 included the following analytes: hydroquinone in skin bleaching creams, formaldehyde in hair products, thioglycolic acid in hair products, diethylene glycol in toothpaste, allergens and phthalates in eaux de toilettes and UV filters in sunscreens. These studies are carried out under the aegis of the European Directorate for the Quality of Medicines and HealthCare (EDQM). Participants are based in 31 national laboratories in Austria, Croatia, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Ireland, Luxembourg, the Netherlands, Portugal, Serbia, Slovakia, Slovenia, Sweden and Turkey.

Market Surveillance Studies (MSS)

Following a discussion in the network in 2011, several countries collected samples of decorative cosmetics (make-up, eye-shadow, eye liner, lip gloss, etc.) to measure the content of certain metals that may give rise to health concerns: antimony, cadmium, chromium, lead, mercury and nickel. Traces of some of these metals may be unavoidable for technical reasons but, in most countries, maximum tolerable limits have not been set.

Products for use by children (shower gels and liquid soaps, skin creams, face paints etc.) were sampled and tested; the results have been taken up in a database (restricted access).

¹ States concerned : Austria, Belgium, Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Montenegro, Netherlands, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, “the former Yugoslav Republic of Macedonia”, Turkey, Ukraine and United Kingdom

The above achievements have been made possible thanks to the voluntary contribution to the overall costs by the Member States' competent authorities. However, scarce resources do not allow all OCCLs to offer the same technical expertise. One of the Network's goals is to promote specialisation (centres of excellence), exchange samples and results between OCCLs and build on mutual trust and recognition of results.

External relations

Cooperation with the European Commission, PEMSAC-AM, Joint Research Centre (JRC) and CEN.

Participation in annual conferences of the General network of Official Medicines Control Laboratories (OMCLs).

Exchange of information with the Health Science Authority (HSA), Singapore and the National Institute of Food and Drug Safety Evaluation South Korea (NIFDS) under the Korean Food and Drug Administration (KFDA).

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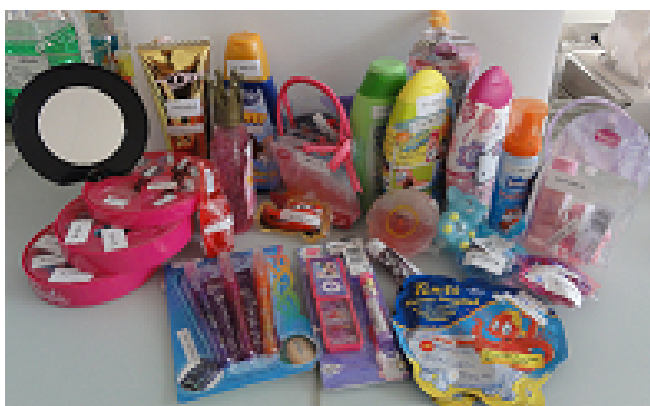
Summary of findings

<i>Number of samples/sets examined:</i>	702	<i>Sets/samples non-compliant:</i> 151 (22%)
<i>individual samples examined:</i>	1060	
<i>Care products for children;</i>	329	<i>Sets/samples non-compliant:</i> 23 (7%)
<i>individual samples examined:</i>	330	
<i>Kids' cosmetics</i>	373	<i>Sets/samples non-compliant:</i> 128 (34%)
<i>individual samples examined:</i>	730	

Starting position and objectives of the investigation

In recent years, cosmetics that appeal to children (referred to as "kids' cosmetics" in this report) have often failed to satisfy the legal requirements in Europe. These products are frequently packaged attractively, sometimes showing images of well-known characters from films or the toy sector, such that both children and adults perceive them as toys.

Products may be part of attractive sets, serve as gifts, and bear warning notes that are common for toys. Most of the producers of such cosmetics are toy manufacturers or trading companies. Legally, these products have to comply with the toy safety directive 2009/48/EC as well as with the cosmetics regulation 1223/2009.



In order to raise the awareness of producers to the unsatisfactory legal compliance of kids' cosmetics, the European Network of Official Cosmetics Control Laboratories (OCCLs) conducted a Europe-wide market surveillance study on kids' cosmetics, including common care and cleansing products for infants and older children for comparison. For convenience, the latter products are referred to as "care products" in this report.

Description of the samples

In the years 2011 to 2013, a total of 702 cosmetic products were sampled by the competent authorities in eleven European countries (table 1). 20% of the samples were sets containing several cosmetic products. Therefore, more than 1000 samples had to be investigated analytically.

table 1 - Collection of samples

	Sampled products	Kids' cosmetics	Care products	Analysed samples
Austria	58	58	0	91
Croatia	32	20	12	38
Cyprus	118	66	52	142
Germany	92	39	53	111
Ireland	85	59	26	131
Portugal	14	0	14	14
Serbia	59	5	54	59
Slovenia	10	0	10	10
Sweden	68	27	41	72
Switzerland	103	98	5	328
Turkey	63	1	62	64
Sum	702	373	329	1060

More than half of the samples were taken from retail shops (59%; table 2). For one fifth (20%) of the samples, the place of sampling was not known or not reported. Only 1.4% (10) of the samples was taken from the manufacturers of the products, and 0.7% (5) of the samples was collected from internet stores.

table 2 - Sampling

Place of sampling	Sampled products	
Retail store	413	59%
Unknown or not reported	143	20%
Customs	59	8%
Distributor	36	5%
Wholesaler	18	3%
Pharmacy	15	2%
Manufacturer	10	1.4%
Internet	5	0.7%
Importer	3	0.4%
Total	702	100%

Kids' cosmetics have rather different origins than care products for children (table 3): while one third (33%) of the kids' cosmetics were produced in China, the Chinese production of care products for children for the European market is negligible (1%). The United Kingdom,

Greece and Germany were the most often labelled European producers for kids' cosmetics in this study, but their accumulated share amounts to only 21% of all samples taken.

table 3 – Country of production of kids' cosmetics

Country	Kids' cosmetics		Care products for children	
China	124	33%	2	0.6%
Unknown or not reported	74	20%	66	20%
United Kingdom	32	9%	11	3%
Greece	24	6%	17	5%
Germany	22	6%	64	19%
Italy	15	4%	23	7%
Switzerland	15	4%	2	0.6%
Taiwan	12	3%		
Sweden	10	3%	21	6%
Europe	8	2%	6	2%
United States	8	2%	4	1%
Spain	6	2%	4	1%
France	4	1%	21	6%
Poland	4	1%	4	1%
Turkey	3	0.8%	46	14%
Austria	3	0.8%	1	0.3%
Israel	2	0.6%	6	2%
India	2	0.6%	1	0.3%
Ireland	1	0.3%	9	3%
Belgium, Hongkong, Netherlands, Hungary	1	0.3%		
Slovenia			7	2%
South Africa			3	0.9%
Belgium, Netherlands	1	0.3%	2	0.6%
Canada, Cyprus, Denmark, Latvia, New Zealand, Slovakia			1	0.3%

Whereas only 6% of the kids' cosmetics were produced in Germany, 27% of the companies responsible for sale of kids' cosmetics were located in Germany (table 4). Together with the United Kingdom (22%), these two countries accounted for half of the companies responsible for distribution of kids' cosmetics. For care products, over one third of the enterprises responsible were located in Germany. For another third of these samples, responsibility was unknown or not reported.

table 4 – Country of company responsible for distribution

Country	Kids cosmetics		Care products for children	
Germany	101	27%	115	35%
United Kingdom	81	22%	13	4%
Unknown or not reported	36	10%	106	32%
Switzerland	31	8%	2	1%
Netherlands	22	6%	7	2%
Ireland	14	4%	11	3%
Spain	14	4%	4	1%
Italy	13	4%	8	2%
Austria	13	4%	1	0%
Sweden	12	3%	24	7%

Country	Kids cosmetics		Care products for children	
Europe	8	3%	0	0%
France	8	2%	12	4%
Greece	6	2%	3	1%
Poland	5	2%	3	1%
Belgium	4	1%	7	2%
Cyprus	4	1%	2	1%
Norway	1	0.3%	0	0%
Slovenia			6	2%
Denmark			2	1%
Latvia			1	0%
Portugal			1	0%
Romania			1	0%

Investigations

Depending on the analytical capabilities of the reporting OCCL laboratories, the samples were tested for the ingredients listed in table 5 & 6.

More than half of the samples were checked for the correct usage and declaration of preservatives, allergenic fragrances, UV filters and colourants. In addition, impurities like carcinogenic nitrosamines (51% of the samples) and heavy metals (29%), phthalates (4%) and chromium VI (3%) were investigated.

The microbiological quality was tested in up to 27% of the samples, wherein *Pseudomonas aeruginosa*, yeast and moulds and *Staphylococcus aureus* were the most often investigated contaminants.

table 5 – Analytical parameters checked

Parameter	Number of Samples	
UV active preservatives	532	76%
Isothiazolinones	445	63%
Allergenic fragrances	433	62%
Formaldehyde	414	59%
UV filters and absorbers	377	54%
Nitrosamines (NDELA, NDMA)	359	51%
Colourants	352	50%
Heavy metals	205	29%
<i>Pseudomonas aeruginosa</i>	187	27%
Yeast and moulds count	184	26%
<i>Staphylococcus aureus</i>	181	26%
Aerobic mesophilic bacteria	156	22%
Chemical - all other	144	21%
<i>Candida albicans</i>	101	14%
Iodopropinylbutylcarbamate	46	7%
Microbiological - all other	42	6%
Phthalates	30	4%
Brominated preservatives	22	3%
Chromium VI	18	3%

table 6 – Analytical parameters checked per country

Parameters	Austria	Croatia	Cyprus	Ireland	Portugal	Sweden	Switzerland	Turkey	Serbia	Germany	Slovenia
UV active preservatives	x	x	x			x	x	x			x
Isothiazolinones	x					x	x	x	x		x
Allergenic fragrances	x		x			x	x				x
Formaldehyde				x		x	x		x		x
UV filters and absorbers	x	x			x		x	x	x		
Nitrosamines (NDELA, NDMA)	x		x				x				
Colourants	x						x				
Heavy metals	x		x	x					x		
<i>Pseudomonas aeruginosa</i>	x		x		x			x	x		
Yeast and moulds count	x		x		x			x	x		
<i>Staphylococcus aureus</i>	x		x		x			x	x		
Aerobic mesophilic bacteria	x				x			x	x		
Chemical - all other		x	x	x	x		x	x	x		
<i>Candida albicans</i>	x				x			x			
Iodopropinylbutylcarbamate				x	x	x					
Microbiological - all other			x		x						
Phthalates	x		x								
Brominated preservatives						x					x
Chromium VI		x									

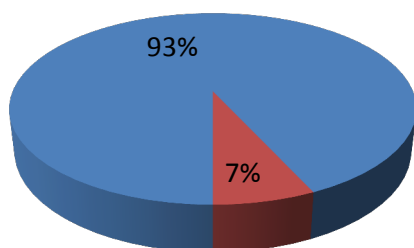
Results and measures

Compliance:

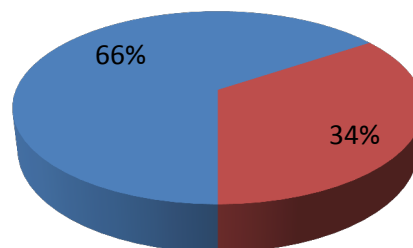
The overall compliance of kids' cosmetics was very low compared to the compliance of common care products. Authorities rejected 34% of the kids' cosmetics collected and only 7% of the care products (table 7, figures 1 & 2). Virtually every second cosmetic set sampled (47%) had to be rejected.

table 7 – Compliance of samples

Non-compliant samples	Overall	Kids' cosmetics	Care products for children
Individual samples	15% (84)	27% (62)	7% (22)
Cosmetic sets	47% (67)	47% (66)	100% (1)
Part of cosmetic sets	32% (159)	32% (159)	0% (0)
Collected samples	22% (151)	34% (128)	7% (23)

Care products for children

■ Compliant ■ Not compliant

figure 1 – Compliance of care products**Kids' cosmetics**

■ Compliant ■ Not compliant

figure 2 – Compliance of kids' cosmetics**Measures:**

Sales bans and recalls were issued for 4.0% of the kids' cosmetics but only for 0.3% of the care products (table 8). Overall, at least 6.1% of the kids' cosmetics and 0.6% of the care products were withdrawn from the market. For 22% of the kids' cosmetics and 0.6% of the care products for children, measures could not be reported, so that, especially for kids' cosmetics, the proportion of products taken from the market could be much higher.

table 8 - Measures taken

Category	Recall of products	Sales ban	Voluntary withdrawal from the market	Corrective measures requested	Unknown measures	Decision pending
Kids' cosmetics	1.1%	2.9%	2.1%	16%	22%	0.5%
Care products for Children	0.0%	0.3%	0.3%	2.4%	0.6%	0.3%

Reasons for non-compliance:

Reasons for the non-compliance of samples are listed in

table 9. There were far more non-compliances related to chemical parameters than to microbiological parameters. Not only did kids' cosmetics comply far less than care products for children; in addition, non-compliances based on chemical analysis outnumbered those based on simple inspection of the declaration by a factor of two (31% vs. 15%) whereas for care products for children, this ratio was inverse (2.4% vs. 5.5%).

The big difference between the two categories of samples investigated is also mirrored in the quality of the declaration of ingredients. Whereas the non-compliance rates for missing declaration of ingredients in kids' cosmetics varied from 2.1% to 9.7% (for UV filters, colourants, preservatives and allergenic fragrances), the rates varied from 0.0% (preservatives, colourants, UV filters) to 1.2% (allergenic fragrances) for care products for children.

table 9 - Reasons for non-compliance

Category	Reasons for non-compliance		Kids' cosmetics	Care products for children
	Samples not compliant	151	34%	7%
	Reasons for non-compliance	201		
	Chemical analysis	123	31%	2.4%
	Microbiological analysis	3	0.3%	0.6%
	Inspection of declaration only	75	15%	5.5%
Forbidden Substances	Substance listed in annex II (not CMR)	3	0.8%	0.0%
	CMR substance	6	1.6%	0.0%
	Non-permitted preservative (not listed in annex VI)	1	0.3%	0.0%
	Non-permitted colourant (not listed in annex IV)	8	2.1%	0.0%
	Non-permitted usage of colourant	0	0.0%	0.0%
	Non-permitted usage according to annex III	0	0.0%	0.0%
	Chemical, all other	9	2.4%	0.0%
	Exceeding limits - chemical	9	2.1%	0.3%
Microbiology	Aerobic mesophilic bacteria	2	0.3%	0.3%
	Yeast and moulds count	1	0.0%	0.3%
	<i>Pseudomonas aeruginosa</i>	0	0.0%	0.0%
	<i>Staphylococcus aureus</i>	0	0.0%	0.0%
	<i>Candida albicans</i>	0	0.0%	0.0%
	Microbiological - all other	0	0.0%	0.0%
Declaration	Missing declaration of preservatives	22	5.1%	0.9%
	Missing declaration of colourants	14	3.8%	0.0%
	Missing declaration of allergenic fragrances	40	9.7%	1.2%
	Missing declaration of UV filters	8	2.1%	0.0%
	Missing declaration of other ingredients	3	0.8%	0.0%
	Warnings missing	11	2.9%	0.0%
	Misleading claims	3	0.0%	0.9%
	Safety assessment	0	0.0%	0.0%
	Insufficient declaration, all other	61	12.3%	4.6%

The use of non-permitted colourants, the presence of the allergenic preservative methylisothiazolinone / methylchloroisothiazolinone (MCI/MI) in amounts above the authorised concentration limits and the presence of toxic impurities like lead or nitrosamines (nitrosodiethanolamine, nitrosodimethylamine) were amongst the reasons for sales bans (for details see below).

Reasons for sales bans and recall of samples:

- Exceeding the legal limit (up to nine-fold) for the allergenic preservative methylchloroisothiazolinone / methylisothiazolinone (MCI/MI) in five cosmetics: two nail varnishes (135 mg/kg and 29 mg/kg) and three shower gels (20, 20 & 21 mg/kg). Legal limit for MCI/MI is 15 mg/kg. The preservative was not even disclosed on the packaging of the varnish with 135 mg/kg.
- Excess levels of lead in two face paints (70 and 16900 mg/kg) and an eyeliner (822 mg/kg)
- Excess levels of carcinogenic N-nitrosamines: a liquid soap with 580 µg/kg N-nitrosodiethanolamine (NDELA), two nail varnishes with 400 µg/kg of NDELA and 80 µg/kg of N-nitrosodimethylamine (NDMA) respectively 50 µg/kg of NDELA and 120 µg/kg of NDMA.

- Presence of the forbidden (annex II) substance p-toluene sulphonamide in four eye shadows (0.04 – 0.06%).
- Presence of the forbidden (annex II) colourant C.I. 45170 in three lipsticks and a lip gloss.
- Presence of the non-permitted colourant C.I. 12310 (not listed in annex IV) in a lipstick
- Presence of the non-permitted colourant C.I. 12315 (not listed in annex IV) in a lipstick
- Presence of the non-permitted colourant C.I. 21110 (not listed in annex IV) in a lipstick.
- Presence of the non-permitted colourant C.I. 45160 (not listed in annex IV) in two lipsticks.
- Presence of the non-permitted colourant C.I. 61551 (not listed in annex IV) in a lip gloss.
- Unidentifiable xanthene dye which is not listed in annex IV of the cosmetics regulation in two eye shadows of the same set.
- Presence of the non-permitted preservative benzisothiazolinone (BIT; 16 & 18 mg/kg) in two nail varnishes.
- Missing declaration of allergenic fragrances (60 mg/kg limonene, 10 mg/kg benzyl alcohol, 10 mg/kg alpha-methyl ionone and 10 mg/kg isoeugenol) in a perfume.
- Missing declaration of allergenic fragrances (300 mg/kg limonene, 500 mg/kg hexyl cinnamal) in a perfume.
- 10 000 CFU/g aerobic mesophilic bacteria in a shampoo
- Underdosage of fluoride (230 instead of 500 mg/kg) in a toothpaste

Compliance related to cosmetic categories:

For sample categories that were collected in relevant numbers (> 10 samples), nail varnishes (73% of the samples), perfumes (47%), body and face paints (36%), lip products (29%) and eye products (29%) had to be rejected at an above average level (table 10). All these product categories belong to decorative cosmetics or perfumes.

On the other hand, typical care and cleansing products like shampoos (6%), toothpastes (7%), body care products (9%), sun protection (9%), face care products (11%), wet wipes (12%) and bath and shower products (14%) were rejected less but there is still much need for improvement.

table 10 - Non-compliance related to cosmetic categories

Cosmetic category (CNPN)	Number	Non-compliant	Recall of products	Sales ban	Voluntary withdrawal	Corrective measures
Face care products	18	11%	0%	0%	0%	11%
Hand care products	1	100%	0%	0%	100%	0%
Body care products	103	9%	0%	0%	2%	4%
Soap products	9	11%	0%	11%	0%	0%
Bath / shower products	166	14%	1%	2%	4%	5%
Foundation	1	0%	0%	0%	0%	0%
Mascara	2	0%	0%	0%	0%	0%
Eye shadow	112	29%	0%	3%	7%	18%
Eyeliner	1	100%	100%	0%	0%	0%
Lipstick	171	29%	3%	1%	3%	20%
Body or face paint	152	36%	3%	0%	0%	10%
Other make-up products	34	18%	0%	0%	3%	15%
Shampoo	65	6%	0%	2%	2%	0%
Hair conditioner	9	22%	0%	0%	0%	22%
Hydroalcoholic perfumes	41	46%	2%	0%	2%	32%
Non-hydroalcoholic perfumes	4					
		50%	0%	0%	25%	25%
Temporary hairstyling	1	100%	0%	0%	0%	0%
Nail varnish / nail make-up	30	73%	0%	20%	0%	47%
Toothpaste	14	7%	0%	7%	0%	0%

Cosmetic category (CNP)	Number	Non-compliant	Recall of products	Sales ban	Voluntary withdrawal	Corrective measures
Wet wipes	43	12%	0%	0%	0%	2%
Cosmetics (General)	6	17%	0%	0%	0%	0%
Deodorant	1	0%	0%	0%	0%	0%
Sun protection	76	9%	0%	0%	0%	5%
Total	1060	23%	1.2%	1.6%	2.5%	12%

Compliance related to place of production:

Nearly every second product originating from Taiwan (50%) or China (44%) was non-compliant. Given the large number of Chinese products investigated, this rate of non-compliance is likely to be representative.

The high non-compliance rate for Hungary is certainly not representative because only one sample was selected.

table 11 - Non-compliance related to place of production

Country of Origin	Number of samples	Non-compliant	Non-compliant	Withdrawal from the market
Hungary	1	1	100%	100%
Taiwan	12	6	50%	8%
Poland	8	4	50%	0%
China	126	56	44%	12%
United States	12	4	33%	0%
India	3	1	33%	0%
Spain	10	3	30%	0%
Europe	14	4	29%	7%
unknown	140	32	23%	1%
Turkey	49	10	20%	0%
Sweden	31	6	19%	10%
United Kingdom	43	8	19%	0%
Switzerland	17	3	18%	0%
Israel	8	1	13%	0%
Greece	41	5	12%	0%
Italy	38	4	11%	3%
Ireland	10	1	10%	0%
Germany	86	1	1%	1%
France	25	0	0%	0%
Austria	4	0	0%	0%
Belgium	3	0	0%	0%
Netherlands	3	0	0%	0%
South Africa	3	0	0%	0%
Slovenia	7	0	0%	0%
Brazil	1	0	0%	0%
Canada	1	0	0%	0%
Cyprus	1	0	0%	0%
Denmark	1	0	0%	0%
Hong Kong	1	0	0%	0%
Latvia	1	0	0%	0%
New Zealand	1	0	0%	0%
Slovak Republic	1	0	0%	0%

Country statistics and measures taken by the national authorities:

The compliance results of the investigations per country are depicted in figure 3 and a detailed list of the measures taken is reported in table 12.

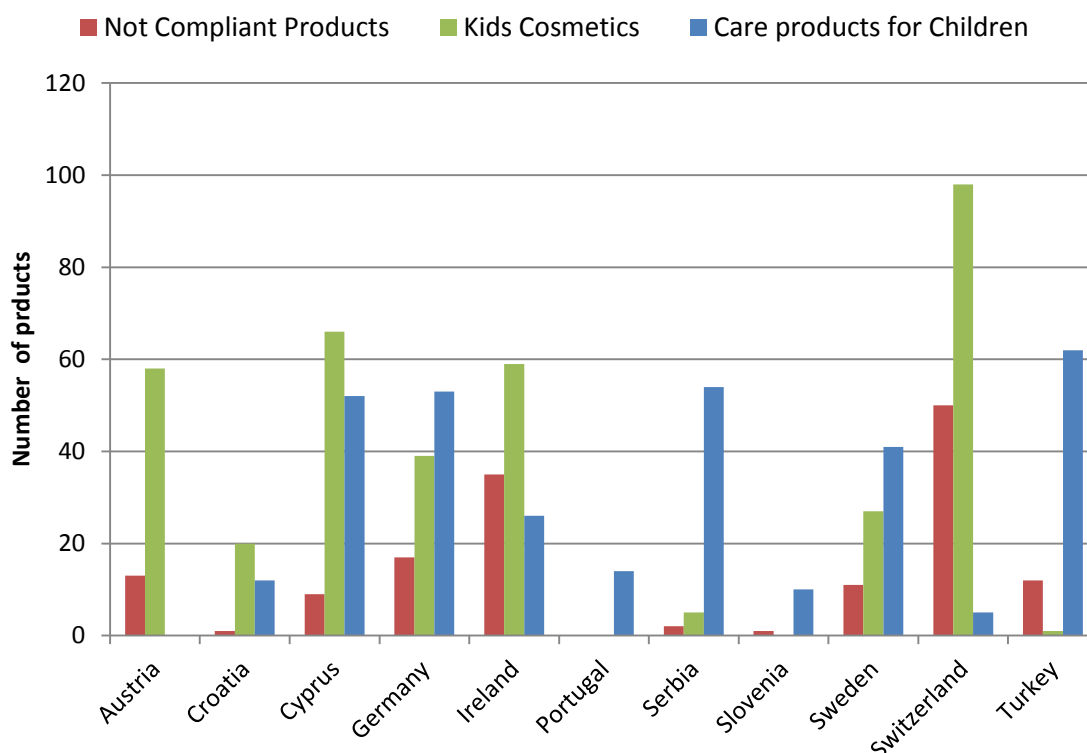


figure 3 – Compliance per country

The non-compliance rates are most probably not representative of the market situation in the different countries. The statistics certainly mirror the different kinds of samples that were collected and which parameters were checked. Also, for several countries the measures taken were not reported because the reporting laboratories did not know them; this is a consequence of the differing law enforcement systems in the different countries.

table 12 - Measures taken by the national authorities

Collected samples	Total	Not compliant	Care products			Decision pending	Recall of products	Sales ban	Voluntary withdrawal	Un-known measures
			Kids cosmetics	for children						
Austria	58	22%	58	0	0%	0%	0%	0%	22%	
Croatia	32	3%	20	12	0%	0%	0%	0%	0%	
Cyprus	118	8%	66	52	0%	0%	0%	0%	0%	
Germany	92	18%	39	53	0%	0%	0%	0%	0%	
Ireland	85	40%	59	26	1%	2%	1%	1%	28%	
Portugal	14	0%	0	14	0%	0%	0%	0%	0%	
Serbia	59	3%	5	54	0%	0%	3%	0%	0%	
Slovenia	10	10%	0	10	0%	0%	0%	0%	0%	
Sweden	68	16%	27	41	0%	3%	0%	3%	1%	
Switzerland	103	49%	98	5	2%	0%	9%	6%	0%	
Turkey	63	19%	1	62	0%	0%	0%	0%	19%	
Sum	702	22%	335	329	3	4	12	9	50	

Conclusions

- Before going into detail, it has to be emphasised that the significantly differing compliance rates reported between countries do not accurately reflect the market situation. The differences are owed rather to the differences in sampling, and the chemical parameters analysed. Besides the quality of the parameters analysed, the number of parameters checked also influences the non-compliance rates: it goes without saying that non-compliance rates are lower when fewer parameters per sample are investigated. Also, measures taken for a particular non-compliance may differ remarkably. For some countries, legal measures were not reported because they were not known to the reporting OCCL laboratory. When the reporting OCCL laboratory is not also the competent authority (for law enforcement), information about measures taken by the competent authority is not automatically fed back to the reporting OCCLs.
 - High levels of lead, carcinogenic nitrosamines and the sensitising preservative methylisothiazolinone / methylchloroisothiazolinone, as well as the use of many non-permitted colourants, were the main reasons for sales bans.
 - Traditional care products for children are produced by the same manufacturers as cosmetics for adults. Therefore it is not surprising, that the rejection rates are comparable and the general compliance of the products is good. Kids' cosmetics on the other hand are mostly marketed by European trading and toy companies which source them from contract manufacturers in the Far East.
It seems evident that savings are being made in the areas of production and quality assurance at the expense of children's health, and that many of these companies lack the necessary experience of legal requirement for cosmetics.
 - The European companies responsible mostly have the necessary documents, such as the composition of the products or the product safety dossier, at their disposal. The high rejection rates for kids' cosmetics based on chemical analysis show that inspection of documents, although important, is not sufficient to guarantee the compliance of these products. This is as true for the responsible persons as for authorities. In some cases, reports for analytical measurements for toys are presented since these cosmetic products must also comply with the toy safety directive. These measurements are usually based on the methods published in the EN 71 series and often relate to impurities like heavy metals or phthalates. In most cases these methods are neither adequate nor do they address the main problems in these cosmetic products. In addition the presented reports do not relate to the lot number in question. Product ingredients like colourants, preservatives or fragrances are hardly ever checked. Sometimes, a simple checking of the ingredient list would show that the disclosed colourants are inconsistent with the colour of the sample.
 - In the light of the high rate of rejections, authorities should intensify surveillance efforts of this product category in the next few years.
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