



Export Compliance: Children's Cosmetics in China

ZMUni Compliance Centre

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1. Definition

Children's cosmetics in China refer to cosmetics for children aged 12 and under and have the functions of cleansing, moisturizing, body refreshing, sunscreen, etc. Products labeled "applicable to the whole population," "suitable for the whole family," etc., or products implying the target users include children by trademarks, patterns, homophones, letters, Pinyin, numbers, symbols, packaging, etc., are subject to the management of children's cosmetics.

The ***Cosmetic Classification Rules and Catalog*** has subdivided the efficacy claims for infants and children based on age:

For infants under 3 years old (including 3 years), cosmetics are limited to cleansing, moisturizing, hair care, sun protection, soothing, and refreshing.

For children aged 3-12, cosmetics are limited to cleansing, makeup removal, moisturizing, beauty enhancement, aromatherapy, hair care, sun protection, repair, soothing, and refreshing.

Notice: Children under 3 years old are not suitable for using cosmetics categorized as "makeup." Children are not recommended to use cosmetics intended for adults, such as hair dyeing, hair perming, and spot whitening.



2. Related Regulations

Regulation	Remark	Effective Date
Regulations on the Management of Registration and Filing Information for Cosmetics.	Products claimed to be used by infants and children need to submit toxicological test reports for the product.	May 1, 2021
Technical Guidelines for Cosmetic Safety Assessment (2021 Edition)	In the safety assessment of children's cosmetics, the children's physiological characteristics should be considered in hazard identification and exposure calculation. The principles of formula design for children's cosmetics should be clearly defined.	May 1, 2021
Regulations on Cosmetic Labeling Management	Laws, administrative regulations, departmental rules, mandatory national standards, and technical specifications that require special attention to be labeled for cosmetics applicable to particular groups, such as children should use "Caution" or "Warning" as guiding language and include safety warning phrases on the visible surface of sales packaging.	May 1, 2022
Supervision and Administration Measures on Cosmetics Manufacture and Operation	Children's skincare cosmetics must adhere to strict production conditions, which should be noted on the cosmetics production license. They should be clearly labeled as children's cosmetics to avoid confusion with food and drugs, preventing accidental ingestion or misuse. Furthermore, when producing and selling children's toys, measures should be taken to prevent them from being misused as children's cosmetics. Additionally, the illegal addition of substances that may harm human health to children's cosmetics constitutes a severe violation of the law, and offenders will be punished severely by the law.	January 1, 2022
Good Manufacturing Practice for Cosmetics	The regulation contains strict environmental index requirements for children's cosmetics manufacturers' clean and quasi-clean work areas.	July 1, 2022
Regulations on Supervision and Administration of Children's Cosmetics	The Regulations stipulate special requirements, including ingredient safety, product safety, efficacy claims, production, and operation for children's cosmetics.	January 1, 2022 (Packaging requirements will be implemented on May 1, 2022)
Draft on the Technical Specifications for Cosmetic Safety (2022 Edition)	The draft explicitly outlines requirements for children's cosmetics. Specifically, ingredients, formulation, production processes, labeling, usage methods, and quality safety control of children's cosmetics should meet the standard safety requirements and comply with the "Regulations on Supervision and Administration of Children's Cosmetics" to ensure product safety. Children's cosmetics should specify the target users on the label.	/
Technical Guidelines for children's cosmetics	It Integrates the various requirements of regulatory documents regarding children's cosmetics, further clarifying their specific requirements.	August 31, 2023

3. Regulatory Requirements

In China, children's cosmetics generally **follow the same management approach as cosmetics, where general cosmetics undergo filing while special cosmetics undergo registration.** However, the National Medical Products Administration (NMPA) stipulated special requirements on formula design, ingredient use, safety assessment, labeling, and testing for children's cosmetics.

Formula Design

(1) The formula design of children's cosmetics should adhere to the principles of safety priority, essential efficacy, and simplicity;

(2) Ingredients with a long history of safe use in cosmetics shall be selected. New ingredients are still under monitoring period, and ingredients prepared by new technologies such as genetic technology and nanotechnology are not allowed. If there is a necessity to use such materials without alternatives, reasons shall be provided, and an assessment of the safety of children's cosmetics use should be conducted;

(3) Ingredients aimed at functions of freckle-removing & whitening, anti-acne, depilation, deodorization, anti-dandruff, anti-hair loss, hair dyeing, hair perming, etc. are not permitted. If ingredients with potential effects similar to the above are used for other purposes, the necessity of their use and safety for children's cosmetics use should be assessed;

(4) Children's cosmetics shall be assessed on the scientificity and necessity of the ingredients used, particularly fragrances, colorants, preservatives, surfactants, etc., considering aspects such as safety, stability, functionality, compatibility, and children's physiological characteristics.

Executive Standard

Children's cosmetics have stricter controls over the total microbial count compared to adult cosmetics. According to the ***Technical Specifications for Cosmetic Safety (2015 edition)***, the limit for the total microbial count in eye cosmetics, lip cosmetics, and children's cosmetics is ≤ 500 CFU/g or 500 CFU/ml.

3. Regulatory Requirements

Labeling and Packaging

The necessary labeling information for children and adult cosmetics is the same, but children's cosmetics should additionally adhere to the following requirements:

(1) Children's cosmetics must display the children's cosmetics logo "**Little Golden Shield**" ("小金盾" in Chinese) published by the National Medical Products Administration(NMPA);

(2) Use guiding phrases such as "**Caution**" or "**Warning**" and display the warning language such as "Used under adult supervision" on the visible surface of the sales packaging;

(3) Terms such as "**Food-grade**" or "**Edible**" or any food-related patterns shall not be used on the label;

(4) The "**Little Golden Shield**" logo should be proportionally displayed on the upper left side of the main display surface of the sales packaging, making it clear and easily recognizable.



儿童化妆品

3. Regulatory Requirements

Notice:

(1) Has a surface area greater than 100 square centimeters; the width of the broadest part of the "**Little Golden Shield**" logo shall not be less than 2 centimeters;

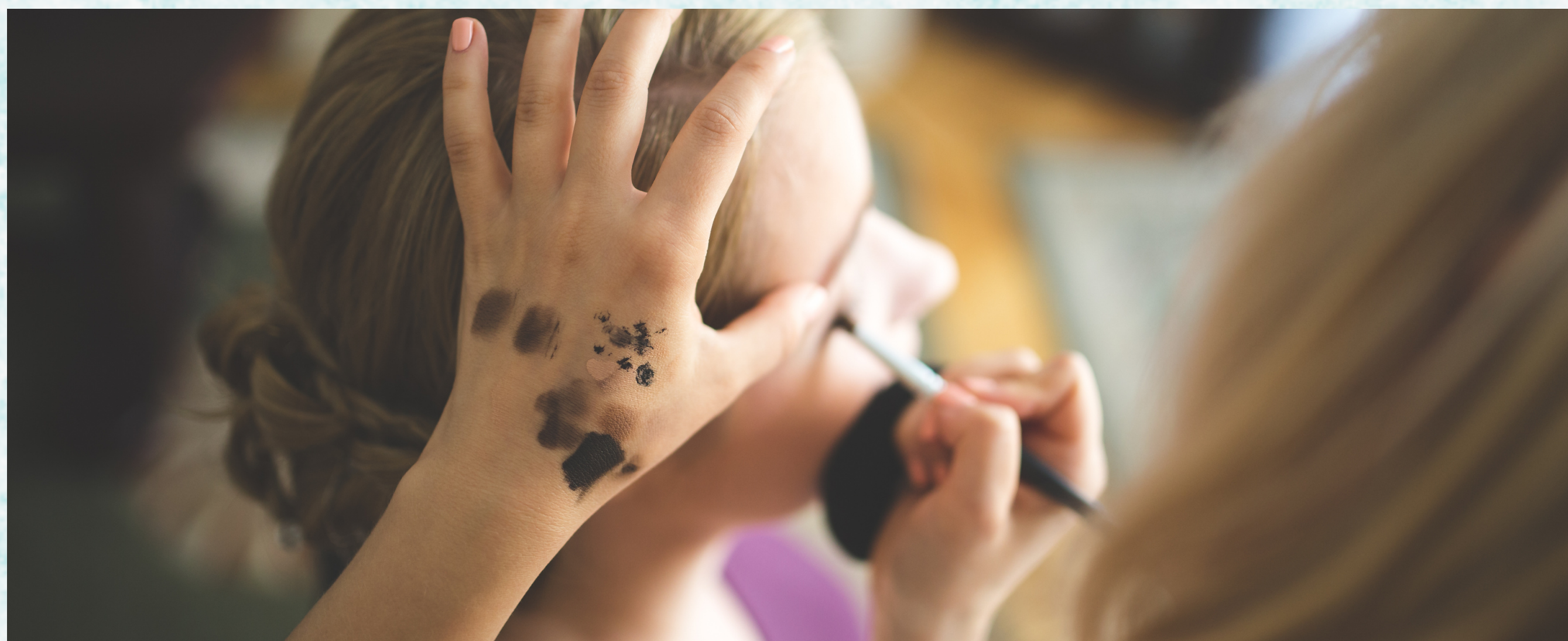
(2) Has a surface area less than or equal to 100 square centimeters; the width of the broadest part of the "**Little Golden Shield**" logo shall not be less than 1 centimeter.

Safety Assessment

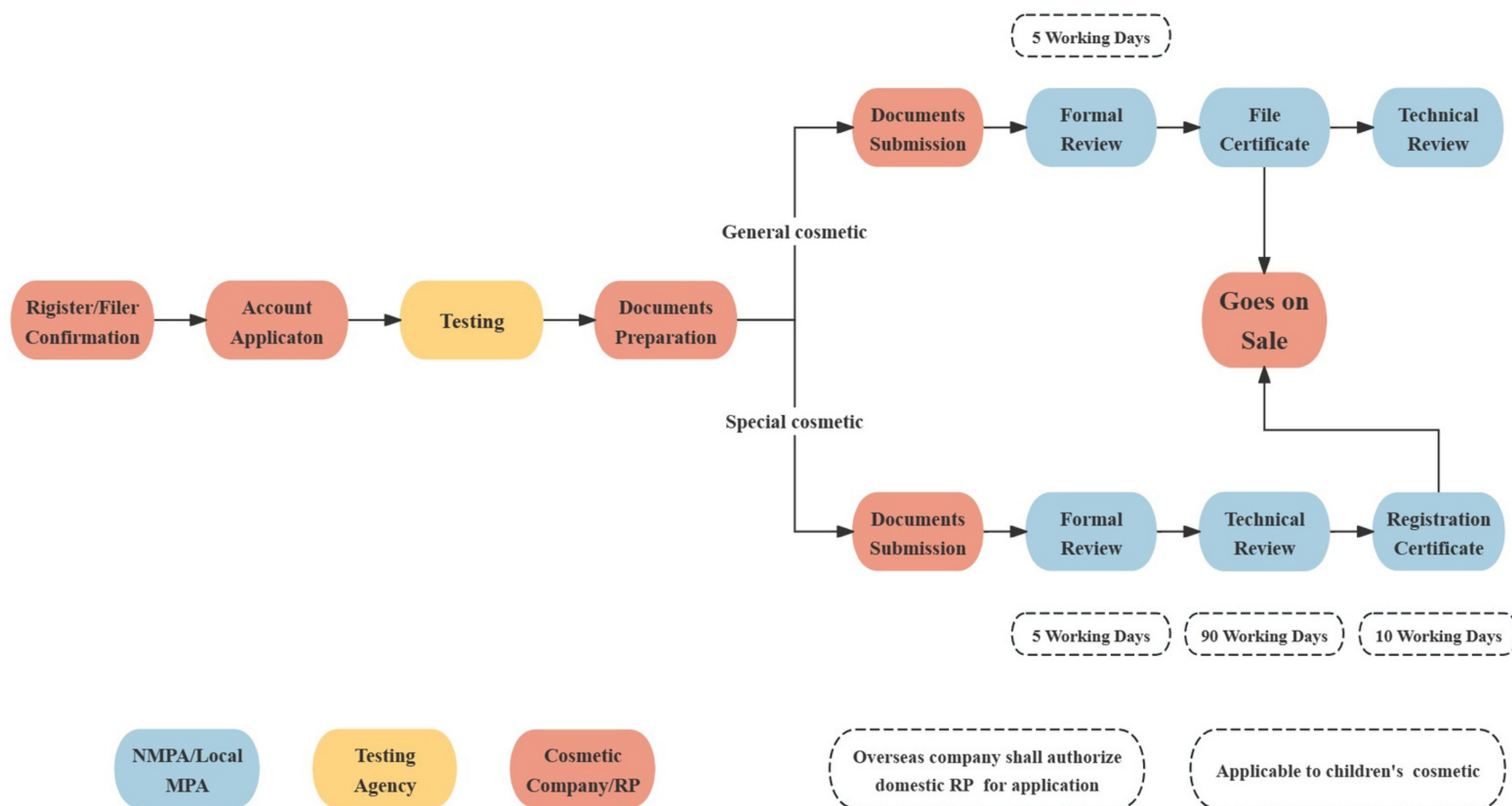
According to the requirements of the *Guidelines for Cosmetic Safety Assessment*, the safety assessment data for children's cosmetics should reflect the following relevant content:

When conducting assessments of children's cosmetics, consideration should be given to children's physiological characteristics in hazard identification, exposure calculation, and other aspects.

The principles of formula design should be clearly defined, and the necessity of using ingredients in the formulation should be explained, particularly for fragrances, colorants, preservatives, and surfactants.



4. Cosmetic Registration/Filing Process in China



Cosmetics and Cosmetic Ingredients Compliance Services

- Notification for Imported General Cosmetics
- Registration for Imported Special Cosmetics
- Notification for Imported Children's Cosmetics
- Registration for Imported Children's Cosmetics
- Application for New Cosmetic Ingredients
- Application for Submission Code of Cosmetics Ingredients
- Notification for Toothpaste
- Responsible Person in China
- Safety Assessment for Cosmetics
- Efficacy Claims Review for Cosmetics
- Ingredients/Labeling Review




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