

childrens makeup

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Children's Makeup

Cosmetics sold for or marketed to children — play makeup kits, toy vanity sets, character-licensed palettes, and the adult products children increasingly use. FDA maintains **two dedicated primary categories** for this — (09) makeup preparations for children (not eye) and (04) children's eye makeup preparations — which tells you the regulator considers it distinct. The rules, though, are largely the same as for adult cosmetics, and that is the gap worth understanding.

The regulatory position, stated plainly

A cosmetic marketed to children is regulated as a cosmetic. There is no separate, stricter US standard for children's cosmetics; there is no premarket approval; the manufacturer carries responsibility for safety.

What does apply:

- **Colour additives** must be approved by FDA for the intended use, and certified colours must come from **FDA-certified batches**. Eye-area products face the narrower eye list.
- **Under MoCRA**, facilities register and products are listed, and the **small-business exemption does not apply** to products that regularly contact the mucous membrane of the eye. **Serious adverse**

events must be reported within 15 business days.

- FDA's December 2022 final guidance recommends a maximum of **10 ppm lead** in externally applied cosmetics and cosmetic lip products.
- **Toy safety law may also apply.** A makeup kit sold as a toy can fall under the Consumer Product Safety Commission's jurisdiction and the CPSIA's lead and phthalate limits, which are stricter than anything in cosmetic law. Whether a product is a toy or a cosmetic — or both — depends on how it is presented.

Why the concern is real

Children are not small adults for exposure purposes: **higher surface area relative to body mass**, thinner skin, more hand-to-mouth behaviour, and a developing nervous system that is more vulnerable to neurotoxicants.

The recurring findings from independent testing of cheap, imported, character-licensed makeup kits are consistent and unflattering: **heavy metals** — lead, cadmium, chromium, nickel, arsenic — above what any responsible product should carry; **asbestos in talc-containing children's makeup**, which has produced recalls and retailer withdrawals; and colour additives that are not approved for the use.

The **talc question** remains formally unresolved: MoCRA directed FDA to establish standardised asbestos testing methods for talc-containing cosmetics, a proposed rule issued in **December 2024** and was **withdrawn in November 2025**.

Practical guidance

1. **Buy cosmetics, not novelties.** A product from a company that also sells adult cosmetics is operating inside a compliance system; a licensed character kit from an unbranded importer may not be.
2. **Require a full ingredient list.** No list, no purchase. It is a legal requirement for retail cosmetics under 21 CFR 701.3.
3. **Prefer talc-free** where a comparable option exists.
4. **Patch test** before a first use, especially on eczema-prone skin.
5. **Nothing on the eye area or lips** unless the specific product is approved for it.
6. **Remove it the same day** with a gentle cleanser, not a scrub.
7. **Do not share** between children — this is how conjunctivitis and impetigo move around a party.

The other question

Children's makeup also sits inside a live cultural argument about the age at which children are marketed appearance products, accelerated by video platforms and by skincare marketing aimed at pre-teens. That argument is outside the rule books entirely, and it is a parenting judgement rather than a regulatory one — but a page that described only the chemistry would be leaving out the part most parents are actually weighing.

Shelf life

Short in practice, because these products are used occasionally, stored badly, and shared. **Twelve months after opening** for creams and liquids; **18–24 months** for powders; **two to four months** for

anything mascara-like. Discard the whole kit after an eye infection, and after any event where it was used on more than one child.

Related

- [Makeup](#) — the shelf this sits on, and the rest of it.
- [Cosmetics](#) — what the label is legally allowed to say, and the full catalogue.
- The rest of *Children's makeup* — [Children's Face Paint](#).
- [Kohl and Kajal](#) — the specific case where children's exposure is most serious.
- [Baby](#) — the category FDA files separately for infants.
- Regulatory statements here follow the FDA and EU sources listed on [Cosmetics](#), read 16 August 2026.