



CASP 2025

PSA 1 – Chemicals

Final activity report

TABLE OF CONTENTS

List of abbreviations.....	3
Executive summary	3
PART I	5
Overview of the activity	6
Participating MSAs	6
Product scope	7
Testing criteria.....	7
Sampling and testing	8
Sampling distribution	8
Testing process.....	8
Test results	9
Overview of the test results and main findings	9
Results per product type	10
Conclusions of the test results	11
Risk assessment and corrective measures.....	11
Risk assessment results	11
Corrective measures	12
Conclusions and recommendations	12
Conclusions	12
Recommendations to stakeholders.....	13
PART II	15
What is CASP?	16
Product-specific activities work plan	17
Product-specific activities processes and tools	18

List of abbreviations

CASP	Coordinated Activities on the Safety of Products
DG JUST	Directorate-General for Justice and Consumers
EC	European Commission
EFTA	European Free Trade Agreement
EISMEA	European Innovation Council and SMEs Executive Agency
EN	European Standard
EU	European Union
GPSR	General Product Safety Regulation 2023/988
IM	Intermediate meeting
KoM	Kick-off meeting
MSA	Market surveillance authority
PAH	Polycyclic aromatic hydrocarbons
PFAS	Per- and polyfluoroalkyl substances
PFCA	Perfluorinated acid
PFHxS	Perfluorohexane sulfonic acid
PFOA	Perfluorooctanoic acid
PFOS	Perfluorooctane sulfonates
POPs	Persistent Organic Pollutants Regulation 2019/1021
PSA	Product-specific activity
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation 1907/2006
SCCP	Short-chain chlorinated paraffins
XRF	X-Ray Fluorescence

Executive summary

Objectives

The overarching goal of the Coordinated Activity on the Safety of Products (CASP) project is to protect the health and safety of European consumers by supporting market surveillance authorities (MSAs) from EU/EFTA countries

to better coordinate their activities. MSAs participate in joint sampling, testing and risk assessment of specific products during CASP.

Product scope

As part of the CASP projects, product specific activities (PSAs) typically focus on specific products. In contrast, the chemicals activity spans multiple product categories by applying a risk-based approach to chemical testing. This approach reflects the potential severe consequences that prohibited chemicals

or excessive levels of regulated substances can have for human health and the environment. The activity targeted consumer products that are more likely to contain regulated or restricted chemicals, considering material composition, intended use and potential consumer exposure, particularly for children.

Main testing criteria and results

The samples were tested against **REACH restrictions** and **POPs Regulation Article 3 and Annex I**. Out of the 128 samples tested, 25 (20 %) did not meet the relevant

requirements. Examination of the warnings, markings and instructions performed by the MSAs showed that 33 (26 %) of 128 samples did not meet the requirements.

Conclusions

The testing results showed that while most samples met the applicable chemical requirements, a significant share of non-compliances were identified, notably linked to PFAS

in coated textile products and restricted metals in cheap jewellery. As a result of this activity, MSAs issued 12 Safety Gate notifications¹.

Key recommendations to stakeholders

For consumers

Before purchase

- ▶ Recent testing has shown that some waterproof children's clothing and some plastics and waterproof materials like shower curtains contain hazardous chemicals such as PFAS;
- ▶ Certain PFAS are restricted in the EU due to their lasting harm to health and the environment;
- ▶ Some "bohemian-looking" jewellery could contain lead and cadmium which can harm your health, damage kidneys and bones, and even cause cancer.
- ▶ Check before you buy: plastics, jewellery and waterproof materials may contain hazardous chemicals. Consult the EU's [Safety Gate](#) to see if the product you are buying has been identified as dangerous.

During use

- ▶ Some fashion jewellery items can release harmful metals when worn. Long-term exposure can damage your health. Do not sleep with fashion jewellery on.

For economic operators

- ▶ If you manufacture, distribute or import a product into the EU, it must meet legal safety requirements before being placed on the market. In addition to other EU legislation, the components and substances in your products may fall under REACH and must comply with its requirements;
- ▶ The updated PFAS testing method in EN 17681-1: 2025 is more rigorous than the previous version. It might have significant compliance implications, as it might detect more non-compliance than the previous version.

For standardisation organisations

- ▶ The EN 1811 standard states that three samples of an item should be tested for nickel release, whenever possible. Provision should be made for testing a single item when more are not available.

¹ Number of notifications as of the date of drafting of this document, based on the data available up to and including 19 March 2026.



Part I

Overview of the activity

Participating MSAs

		Country	MSA
1		Belgium	Federal Environment Inspectorate
2		Croatia	State Inspectorate
3		France	General Directorate for competition, consumer protection and fraud control
4		Germany	State Directory of Saxony*
5		Hungary	National Authority for Trade and Consumer Protection*
6		Italy	Pistoia-Prato Chamber of Commerce*
7		Latvia	Consumer Rights Protection Centre
8		Lithuania	State Consumer Rights Protection Authority*
9		Luxembourg	Environment agency Luxembourg*
10		Malta	Malta Competition and Consumer Affairs Authority
11		Spain	Inspection Service SOIVRE
12		Sweden	Swedish Chemicals Agency

* MSAs can participate in CASP in a testing-only modality. They participate in the testing process, but are not involved in the discussions and decision-making and do not take part in the activity meetings.

Product scope

Unlike previous PSAs, this activity did not focus on a specific type of product. It targeted consumer products with a higher likelihood of containing regulated or restricted chemicals, considering factors such as material composition, intended use and potential consumer exposure, particularly for children. The presence of prohibited chemicals or excessive

levels of regulated substances in consumer products can have severe consequences for both human health and the environment. This activity applied a risk-based approach to testing, focusing on chemical hazards rather than on a predefined product group. Five product categories were selected, illustrated below.

Table 1: Product scope

Product category	Description and examples of products
Cheap consumer articles made of plastic	The focus was on soft plastics. Items collected include shower curtains, sunglasses, mats and tablecloths, hairbrushes, phone cases, toys (e.g. inflatable jumping balls, beach balls) and costume elements.
Children's products made with textile parts	Items collected include bath capes, bibs, t-shirts, scarves, and costumes.
Children's products made of plastic	Items collected include baby floats, changing mats, bibs, combs, sunglasses, toys (e.g. plastic balls), inflatable bathtubs and tableware.
Cheap jewellery	Fashion jewellery items under EUR 30 made of non-precious materials, such as necklaces, rings, earrings and bracelets.
Children's clothing and footwear	Items collected include raincoats, rain jumpsuits, waterproof jackets, windbreakers, rubber boots, garden shoes, rain pants and ski shorts.

Testing criteria

Testing was carried out in accordance with EU chemical legislation, primarily the Registration, Evaluation, Authorisation and Restriction (REACH) Regulation² and the Persistent Organic Pollutants (POPs) Regulation³. Depending on the product category and material composition, relevant REACH restriction entries covering substances such as phthalates, heavy metals, azo dyes and per- and polyfluoro-alkyl substances (PFAS) were applied, together with Article 3 and Annex I of the POPs Regulation.

European and international standards were included in the testing plan. These standards outline validated analytical methods at the time of testing. EN 17681-1:2025 was applied for PFAS testing in textile and coated products, ISO 14362-1:2017 for the detection of certain azocolourants in products with textile parts, and EN 1811:2023 for assessing nickel release in cheap jewellery.

² Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals

³ Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants

Sampling and testing

Sampling distribution

The sampling process was carried out by MSAs based on the sampling distribution agreed during the kick-off meeting (KoM). A total of 129 samples were collected by participating MSAs, both online and from physical stores: 53 children's clothes and footwear, 34 cheap consumer articles made of plastic, 21 children's products made

of plastic, 12 items of cheap jewellery and nine children's products with textile parts.

Out of the 129 samples, one cheap consumer articles made of plastic was not tested, as it was out of the scope of the activity.

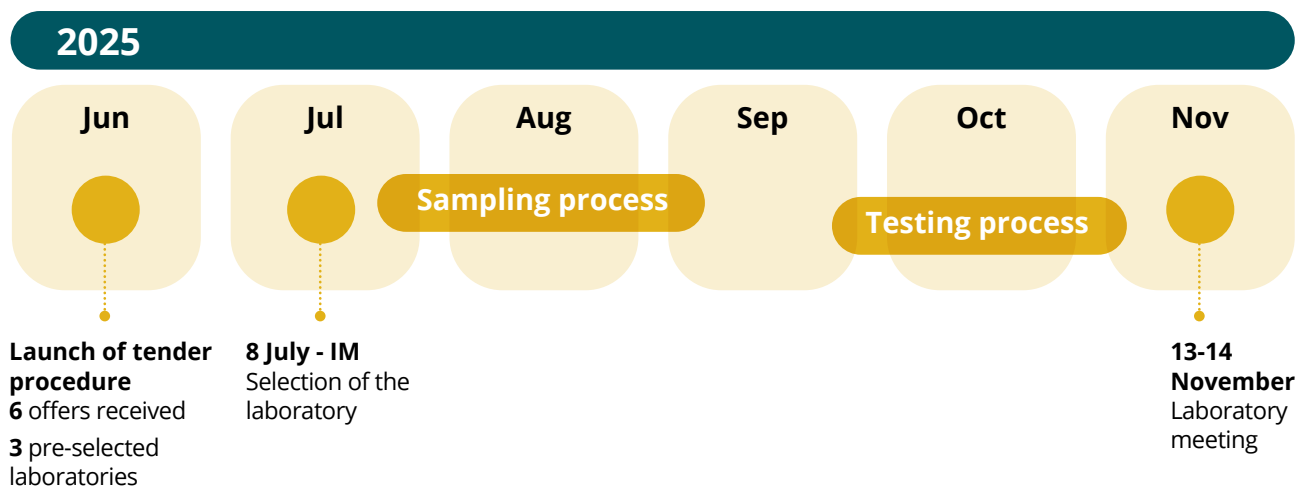
Testing process

The laboratory responsible for testing was selected through a tender procedure launched in June 2025. Of the 56 EU/EFTA laboratories contacted, six submitted offers. These were assessed on technical and financial grounds, leading to the shortlisting of three candidates. During the intermediate meeting (IM), MSAs selected the laboratory

that was awarded the highest number of final points based on the quality and price of their offer.

Following the selection of the laboratory, MSAs collected samples and sent them to the laboratory.

Figure 1: Timeline of the sampling and testing process



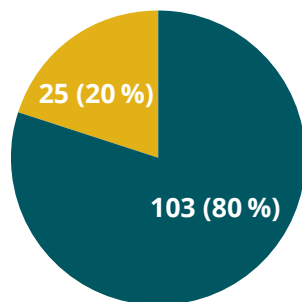
Test results

Overview of the test results and main findings

A total of 25 (20 %) of 128 samples tested did not meet the requirements laid down in REACH and/or the POPs regulations. In addition to the laboratory testing, MSAs carried

out checks on warnings, markings and product information, identifying 33 samples with formal non-compliances.

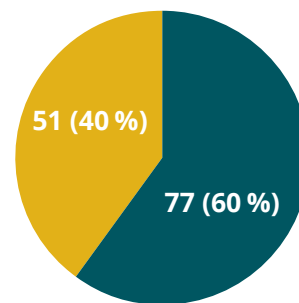
Figure 2: Overall test results (excluding checks⁴ of warnings, markings and product information) (N=128)



■ Met the requirements

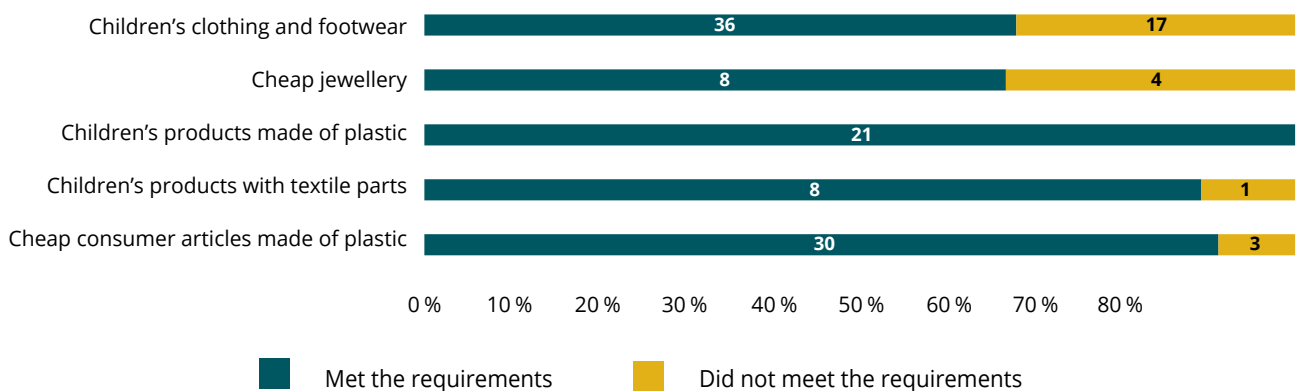
■ Did not meet the requirements

Figure 3: Overall test results (including MSAs' checks of warnings, markings and product information) (N=128)



The non-compliance rate across the five product categories varied significantly. Figure 4 shows the test results by product category.

Figure 4: Test results by product category



⁴ MSAs checked markings, warnings and instructions on their samples based on the checklist prepared by the technical expert.

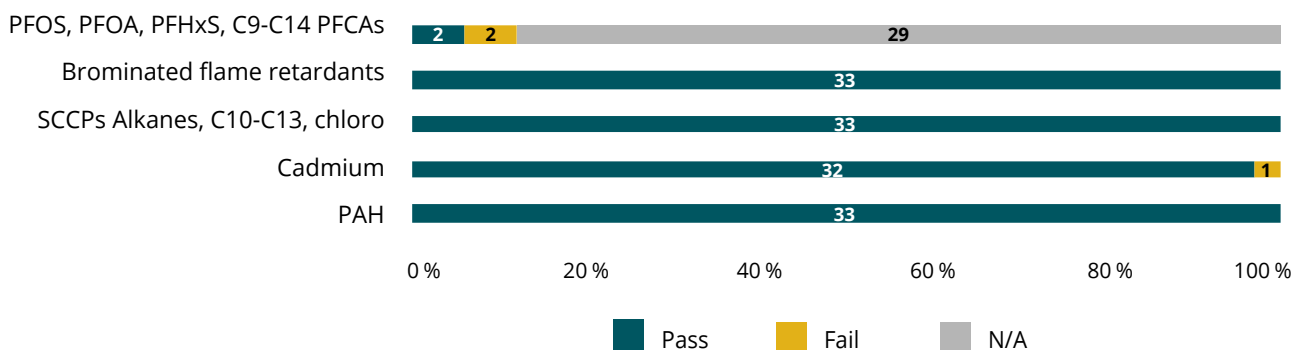
Results per product type

Cheap consumer articles made of plastic

Three out of 33 (9 %) cheap consumer articles made of plastic did not meet the applicable chemical requirements: two shower curtain samples failed due to excessive PFAS related substances (PFOS, PFOA,

PFHxS and C9-C14 PFCAs), and one reflector set due to excessive cadmium levels.

Figure 5: Test results - cheap consumer articles made of plastic



Children's products with textile parts

One out of nine (11 %) children's products with textile parts tested, a costume, did not meet the requirements, as it failed the test for PFAS-related substances. All nine samples met the azocolourants and azodyes testing requirements.

Children's products made of plastic

All 21 tested children's products made of plastic met the requirements for PAHs, phthalates, cadmium, SCCPs and brominated flame retardants.

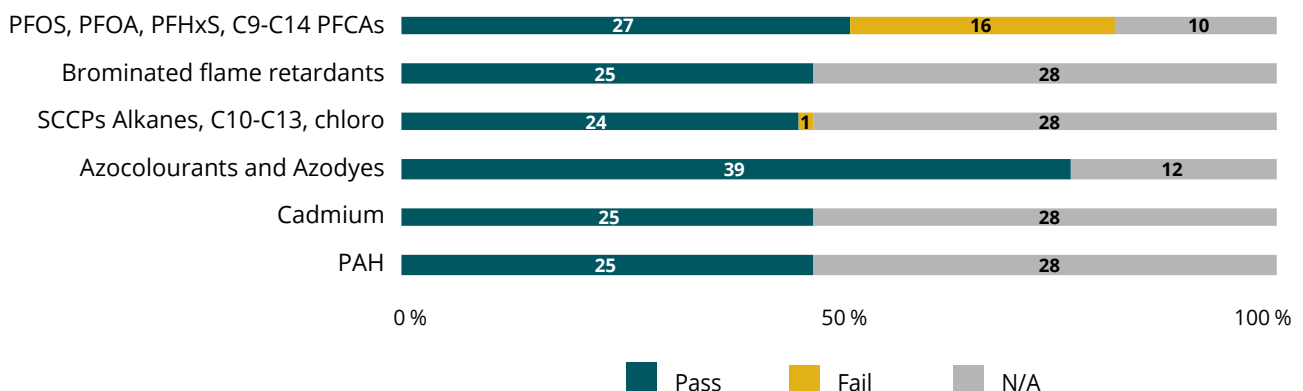
Cheap jewellery

Four out of 12 (33 %) cheap jewellery samples did not meet the requirements as they exceeded the permissible levels of cadmium (four samples), lead (one sample) and nickel (one sample).

Children's clothing and footwear

36 (68 %) out of 53 children's clothing and footwear samples met the requirements, while 17 (32 %) did not. Non-compliance was mainly linked to PFAS-related substances: 16 samples failed this test. 15 were raincoats, windbreakers, jackets or similar products, and one was footwear (beach slippers).

Figure 6: Test results - children's clothing and footwear



Conclusions of the test results

This activity examined a range of consumer products with potential chemical risks. 20 % of the 128 samples tested did not meet the requirements under REACH and/or POPs regulations. Chemical non-compliance was mainly linked to PFAS-related substances in waterproof or coated textile products, particularly children's clothing and footwear, as well as to inexpensive jewellery exceeding the permissible REACH levels of cadmium, lead and nickel.

There were no significant differences in the results per sampling channel (online or physical stores). Of the products that did not meet the testing requirements, 19 were from non EU/EFTA countries, while one non compliant sample was from an EU/EFTA country.

Overall, the results show that non compliance under this activity was driven by both chemical composition findings and formal compliance shortcomings across multiple product categories.

Warnings, markings and instructions

The checks performed by the MSAs of markings, warnings and instructions in their national language(s) revealed that 33 samples (26 %) did not meet the requirements.

The most common issues related to missing or incomplete identification of the responsible economic operator, such

as the absence of the company name and/or contact address, as well as incomplete mandatory product information, particularly for products sold online.

Risk assessment and corrective measures

Risk assessment results

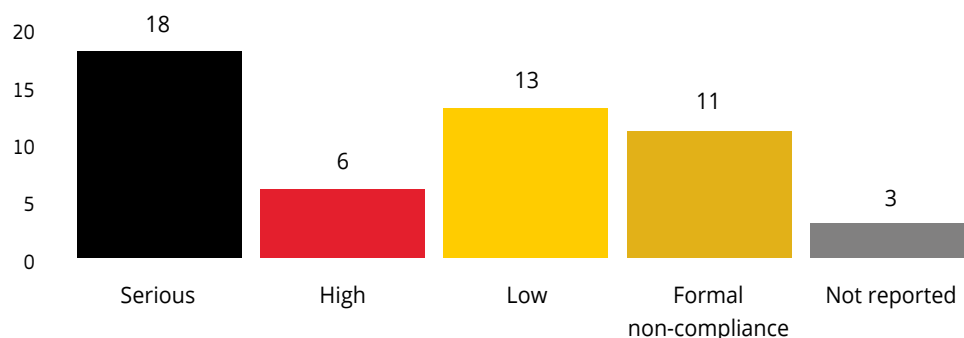
When assessing whether a product poses a risk, Article 26 on the notifications of dangerous products through the Safety Gate Rapid Alert System should be respected⁵.

In total, 51 (40 %) samples did not meet the requirements. This was due to failures in either the tests and the checks on warnings, markings and instructions, or both⁶. 24 samples were evaluated as posing either a

serious (18) or high risk (6). 13 samples were assessed as posing a low risk.

Figure 7 shows the risk levels of the samples that did not meet the requirements.

Figure 7: Overview of risk levels of samples



⁵ Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety

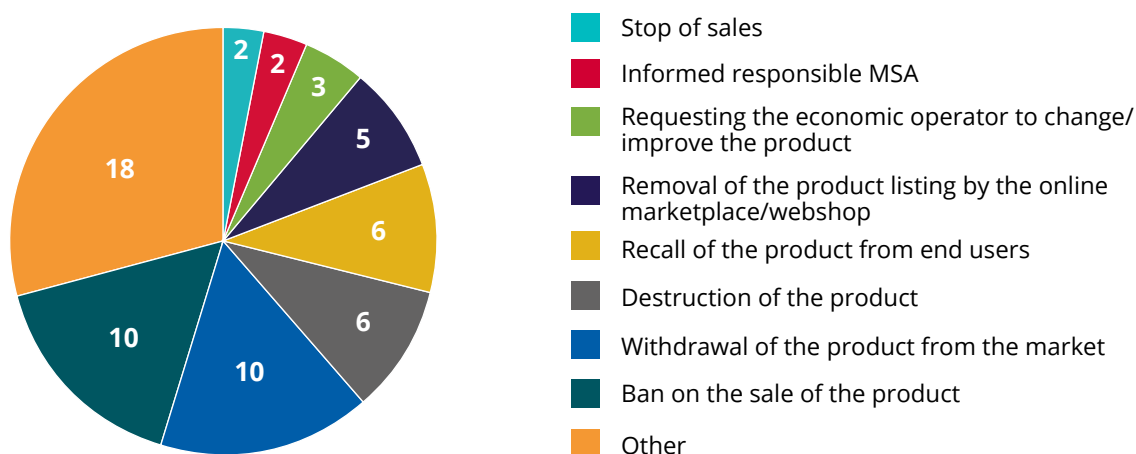
⁶ Products that met the testing requirement, but not the requirements on warnings, markings and instructions are reported under the label 'Formal non-compliance'.

Corrective measures

Based on the test results and risk assessments performed, the MSAs determine the corrective measures for products that do not comply with EU legislation and/or applicable standards, Figure 8 illustrates the corrective

measures taken for products that failed to meet the testing requirements and/or checks on warnings, markings and instructions.

Figure 8: Measures taken for products that did not meet the requirements (N=62)



Additionally, when a serious risk is identified, MSAs are legally required to submit a notification through the Safety Gate Rapid Alert System, in accordance with Article 26 of the General Product Safety Regulation (GPSR)⁷. On the basis of the GPSR and Regulation (EU) 2019/1020, it is

also recommended that notifications of measures taken for products assessed as posing a less-than-serious risk be submitted. Following the actions triggered by this testing campaign, Safety Gate notifications were issued for 12 children's clothes and footwear products.

Conclusions and recommendations

Conclusions

This activity demonstrated the effectiveness of applying a risk-based approach to product testing within the CASP framework. By focusing on chemical hazards rather than on a single product category, the activity enabled participating MSAs to jointly address regulated and restricted substances across a wide range of consumer products. The results provided MSAs with a clear and actionable basis for risk assessment, enforcement measures and follow-up actions.

As an activity covering multiple product categories, the testing also highlighted a number of practical and methodological challenges. These included difficulties in anticipating product material composition at the sampling stage and variations in the applicability of certain tests across different products. Despite these aspects, the activity demonstrated that a risk-based testing approach can be successfully implemented at EU level and can generate relevant results for market surveillance purposes.

⁷ Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and compliance of products.

Recommendations to stakeholders

The following recommendations are based on the outcome of the testing process and discussions among MSAs during the project.

For consumers

Before purchase:

- ▶ EU safety tests have found that some waterproof children's clothing contains harmful chemicals.
- ▶ Recent testing has shown that some plastics and waterproof materials, including shower curtains, contain hazardous chemicals such as PFAS. You can avoid these chemicals by choosing alternative textiles treated with natural waxes or non-fluorinated finishes.
- ▶ Certain PFAS are restricted in the EU due to their lasting harm to health and the environment. These substances are part of wider EU action to consider group-wide restrictions on PFAS.
- ▶ Is all of your fashion jewellery safe? Some "bohemian-looking" jewellery, often heavy and with shiny decorative finishes, could contain lead and cadmium which can harm your health, damage kidneys and bones, and even cause cancer – making it a restricted substance.
- ▶ As a consumer you have the right to know whether the product you are buying contains harmful chemicals. The producer or distributor is required to respond to consumer requests concerning substances of very high concern within 45 days.
- ▶ Shop smart – when buying from online stores, choose those that clearly identify the product's manufacturer and distributor.
- ▶ Check before you buy: plastics, jewellery and waterproof material can contain hazardous chemicals. Consult the EU's [Safety Gate](#) to see if the product you are buying (with the same batch number and/or product code) has been identified as dangerous. If unsure, contact the manufacturer.
- ▶ Do not sleep with jewellery on. If you get an allergic reaction, stop wearing it and seek medical advice. If you learn that a product has been recalled, stop using it immediately and follow the instructions on the recall notice. If the product contains PFAS, avoid disposing of it with regular household waste, as it may contaminate the environment.
- ▶ Did you know that you can report any safety issues or accidents with your product to your consumer protection authority? Visit the [Consumer Safety Gateway](#).

For economic operators

During use

- ▶ Do you wear fashion jewellery every day? Some items can release harmful metals such as lead or nickel when worn. Long-term exposure can damage your health, and nickel may trigger lifelong allergies.
- ▶ If you manufacture, distribute or import a product into the EU, it must meet legal safety requirements before being placed on the market. In addition to other EU legislation, the components and substances in your products may fall under REACH and must comply with its requirements.
- ▶ Stay informed about changes to EU legislation. In 2025, new substances, including some PFAS, were added to the list of restricted chemicals in the Persistent Organic Pollutants Regulation. Some previously regulated PFAS are now restricted in the EU.
- ▶ Selling online? Ensure you comply with the General Product Safety Regulation for distance sales. Article 19 sets out the responsibilities of economic operators (distributors and sellers) for distance sales. Article 22 defines specific duties for online marketplace providers to ensure product safety.
- ▶ Regularly conduct your own testing to ensure compliance with the applicable regulations.
- ▶ The updated PFAS testing method in EN 17681-1: 2025 is more rigorous than the previous version. It might have significant compliance implications, as it might detect more non-compliance than the previous version.
- ▶ Know your supplier and your products. Choose and verify your suppliers carefully. If in doubt, request additional testing and proof of product compliance. As a voluntary measure, you may request confirmation of compliance and data about the article and its components from within the supply chain.
- ▶ Use X-ray fluorescence (XRF) analysis to detect lead,

cadmium and nickel. This quick and effective method can help distributors and sellers ensure product compliance.

- ▶ If a product recall is issued, clear customer communication is essential. Ensure that the recall notices explain the hazards, how consumers can claim compensation and who to contact.
- ▶ It is recommended using the European's commission template for a [recall](#) notice for consistency. Closely monitor the recall's impact and adapt your approach if needed. Inform the consumers about how to return the products to you.
- ▶ Unsure about your legal obligations? Contact your national market surveillance authority for guidance. National helpdesks can also provide support – find yours [here](#).

For national and European authorities

- ▶ EU-wide testing found that waterproof textiles (such as windbreakers, raincoats, and flip-flops) and fashion jewellery can contain harmful chemicals. Continue market surveillance of these products, conduct regular testing, engage with economic operators and keep consumers informed.
- ▶ Rapid screening using X-ray fluorescence (XRF)

analysis can easily detect the presence of dangerous heavy metals in jewellery. Use portable XRF analysers for screening and, where necessary, do targeted follow-up controls using additional chemical analyses.

- ▶ Are you aware of the updated PFAS testing method for textiles outlined in EN 17681-1: 2025? It might have significant compliance implications, as it might detect more non-compliance than the previous version.

For standardisation organisations

- ▶ The EN 1811 standard states that three samples of an item should be tested for nickel release, whenever possible. Provision should be made for testing a single item when more are not available.



Part II

What is CASP?

The Coordinated Activities on the Safety of Products (CASP) enable Market Surveillance Authorities from European Union / European Free Trade Agreement

countries to cooperate and reinforce the safety of products placed on the Single Market.

CASP 2025 includes two product-specific activities and one horizontal activity.

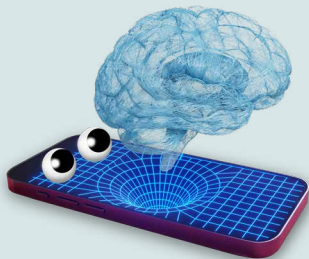
Participants in the product-specific activities test the jointly selected products sampled on their respective national markets. The products are tested in accredited laboratories in the EU/EFTA according to the commonly agreed testing criteria.



PSA 1
Chemicals



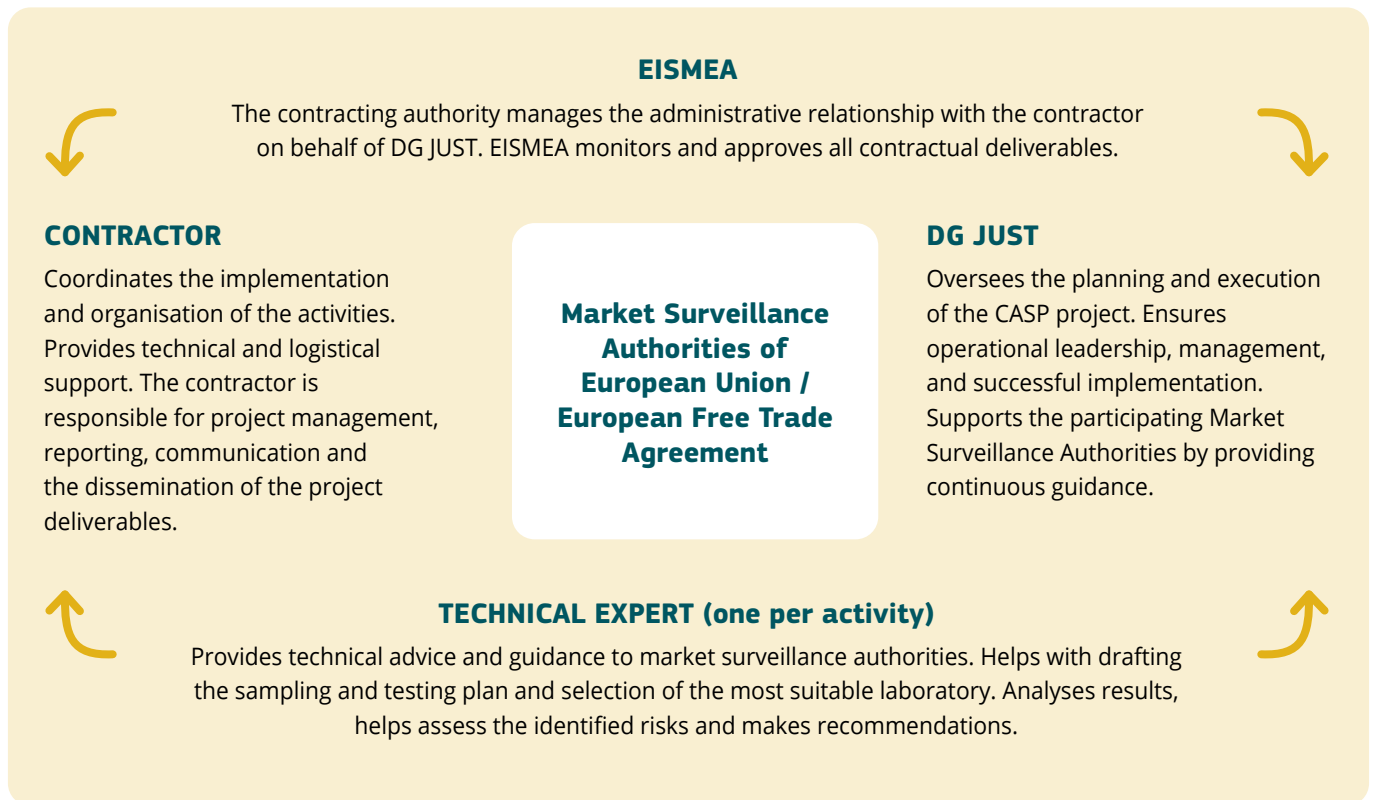
PSA 2
Child bicycle seats



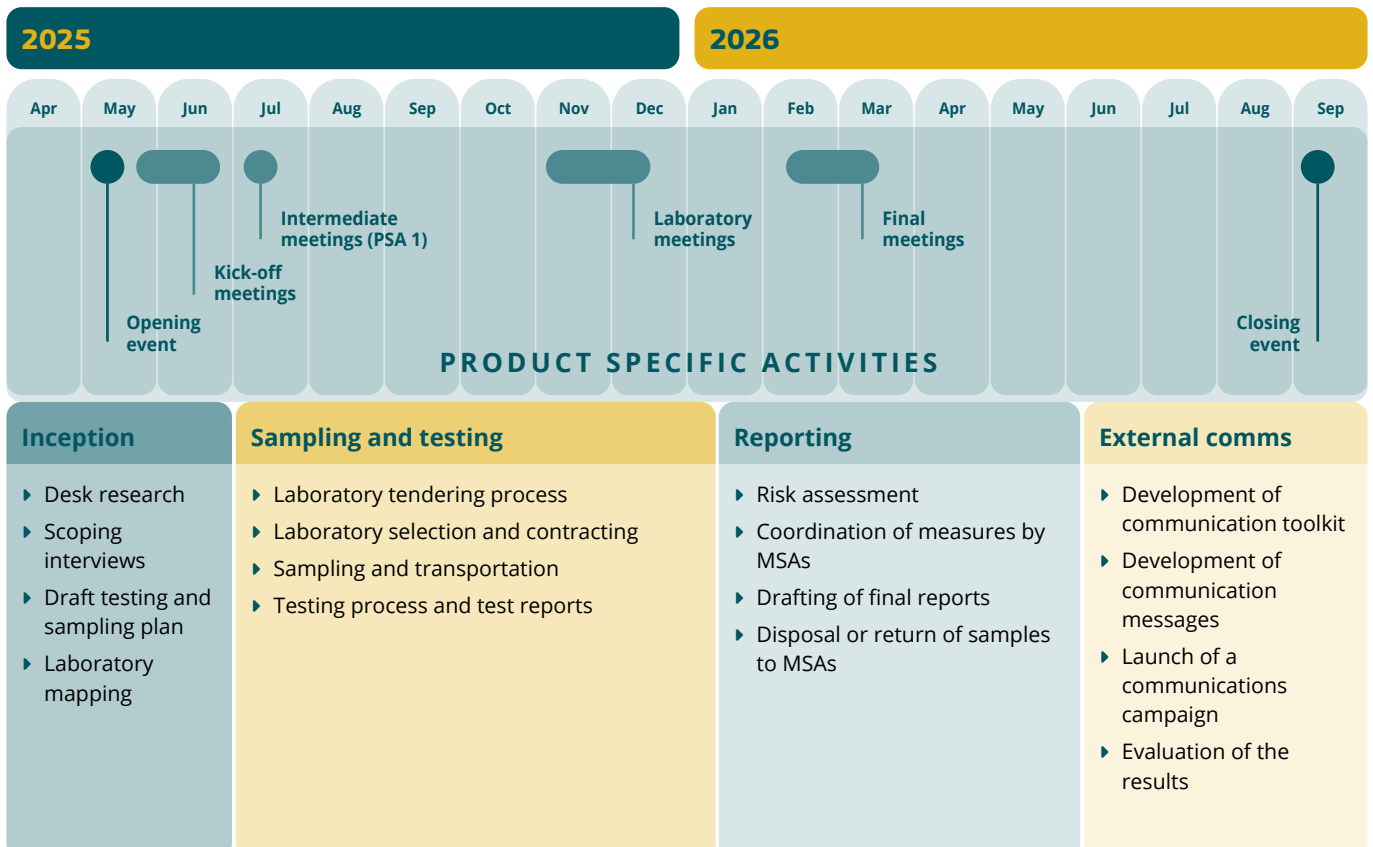
HA
Mental health risks

Horizontal activities provide a knowledge-exchange forum for market surveillance authorities. With the guidance of technical experts in the relevant fields, the participants develop common approaches, procedures and practical tools for market surveillance.

Roles and responsibilities



Product-specific activities work plan



Product-specific activities processes and tools

0 Pre-CASP process DG JUST conducts a priority-setting exercise with market surveillance authorities to select the product categories for each CASP project. This selection process encompasses both new and previously tested product categories in the framework of a CASP project.	1 Validation of the testing and sampling plans The technical experts draft the testing plans based on the priorities set by market surveillance authorities and the main product hazards identified. The drafts are presented at the kick-off meetings, then finetuned and validated by the participants.	2 Laboratory selection The contractor's team maps the testing laboratories and contacts them to collect preliminary fee quotes and other relevant information. The tendering process is launched after the kick-off meetings, and the offers are compared, analysed and evaluated. During the intermediate meetings, the market surveillance authorities select one laboratory per activity.
3 Collection and transportation of samples The market surveillance authorities collect samples from their national markets, perform preliminary checks and send them to the selected testing laboratory.	4 Testing and delivery of test reports The laboratory tests the samples according to the agreed testing plan. The market surveillance authorities check and validate the test reports.	5 Risk assessment The technical expert and the market surveillance authorities perform risk assessments on samples that do not meet the requirements.
6 Measures adopted by the market surveillance authorities The market surveillance authorities take corrective measures for the products that do not meet the requirements and issue notifications on Safety Gate.	7 External communications The external communications campaign launches when all testing results have been validated. It is rolled out via earned media engagement activities, and supported through stakeholder dissemination activities.	

External communication

Communication tools

- ▶ **Final reports** produced for each activity and for the CASP 2025 project
- ▶ **PSA factsheets**
- ▶ **Press releases and social media posts**

Channels

The communication material is disseminated via:

- ▶ ec.europa.eu web presence ([Safety Gate](#), [CASP pages](#) & [EISMEA news](#) section)
- ▶ Owned and earned social media
- ▶ Communication channels of market surveillance authorities
- ▶ Selected media partnerships

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Directorate Consumers
Unit B4 Product Safety and Rapid Alert System
Email: JUST-B4@ec.europa.eu

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