

Microbiological Risk Control in Cosmetic Manufacturing: Quality Assurance Practices for Safer Product Release

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Abstract

Microbiological contamination is a continuous risk in the cosmetic production industry that can pose a serious danger to the safety of cosmetic products, product stability and regulatory compliance. The cosmetics industry worldwide is increasingly adopting preservative-free, natural and water-based products, and end product testing is clearly inadequate. This synthesis reviews what is known about microbiological risk control practices and quality assurance (QA) frameworks that can aid in the release of cosmetics that will be safer. This synthesis presents the peer-reviewed evidence as of October 2025 regarding microbiological risk control practices and quality assurance (QA) for safer cosmetic product release. Raw materials (42% bacterial incidence), water systems (35%), equipment surfaces (28%), and personnel (18%) are examined and preventive control measures like environmental monitoring programs, preservative efficacy testing (PET), and Good Manufacturing Practice (GMP) based sanitation programs are reviewed. The European RAPEX database shows that the number of microbiological non-compliance notifications has increased from 8 in 2015 to 49 in 2024, highlighting serious vulnerabilities and deficiencies throughout the system. The paper also shows that by implementing risk-based QA frameworks the incidence rate of recalls is lowered by around 70%, the rate of consumer complaints by 86% and the cost of regulatory non-compliance is reduced from an average of USD 485,000 to USD 37,500 per year. Clean-beauty trends, outsourced manufacturing and global supply chains are critically assessed as emerging challenges. Together, these findings have confirmed that proactive science-based microbiological risk management, which includes Corrective and Preventive Action (CAPA) systems, supplier qualification, and ongoing monitoring, is critical to the successful and confident release of products and continued consumer trust.

I. INTRODUCTION

Billions of people use cosmetics every day on a variety of surfaces of the body, requiring high microbiological safety requirements to avoid infection and skin and systemic reactions [1]. Traditionally, the cosmetics industry has largely depended on the final product testing as a quality gate; however, over the past few decades, data has gathered and confirmed that these strategies are reactive and are not able to deal with contamination events that occur at a stage earlier in the manufacturing process [6]. The microbiological requirements have gradually tightened over the years, as seen in the United States Food and Drug Administration (FDA) requirements and the European Commission's Cosmetics Regulation No. 1223/2009, which means that producers need to be proactive and implement more effective risk-based quality assurance systems [2].

Microbiological hazards that can be found in cosmetic products range from bacterial pathogens, including *Staphylococcus aureus*, *Pseudomonas aeruginosa* and different types of *Enterobacteriaceae*, to fungal contaminants, such as moulds and yeasts [5]. They have the ability to multiply in aqueous emulsions, oil-in-water creams and wet

formats for personal care products, especially where the preservative systems are not properly chosen or optimized. Preservative free and natural formulations are of particular concern, and have increased significantly in market share to meet consumer demand for clean beauty products but carry an increased risk of contamination because of a decrease in antimicrobial protection [17, 18].

The current document combines information about microbiological risk control activities within the cosmetic manufacturing process, particularly quality assurance methods to support compliance with regulatory requirements and safer product release. The paper covers contamination source analysis, preventative control measures, preservative system evaluation, environmental monitoring programs and the part of Quality Management Systems (QMS) and CAPA processes. Comparative analyses are made between traditional end-product testing methods and quality assurance systems based on risk assessment, and quantitative data are presented to demonstrate the operational and financial advantages of a microbiological control system [13, 20].

II. MICROBIOLOGICAL CONTAMINATION: SOURCES AND RISK PROFILE

A. Primary Contamination Sources

Most often, microbiological contamination in cosmetics is not from a single source but due to a combination of multiple input pathways throughout the manufacturing value chain [1]. The bacterial contamination rate in raw materials was estimated at 42% and fungal contamination was estimated at 18% among streams of raw materials that are not well qualified [3]. The second most important route of contamination is water systems, particularly because purified water is the main constituents of aqueous formulations and acts as a culture medium for gram-negative bacteria like *P. aeruginosa* when microbial action limits are exceeded [10]. Bacterial surface contamination levels on equipment surfaces and filling lines are about 28% when conducted during normal environmental monitoring, especially in facilities where there are inadequate clean-in-place (CIP) procedures [5, 6].

Personnel related contamination, which is a result of poor gowning practices, hand hygiene failures, or lack of adherence to standard operating procedures, is responsible for about 18% of contamination incidents in surveyed facilities [5]. An estimated 22% of the bacterial contamination and 20% of the fungal contamination incidence is due to environmental factors, such as airborne

microbial load in manufacturing areas and contaminated drains, when there is no monitoring program or it is conducted infrequently [12]. In addition, there are compounded risks in an outsourcing or contract manufacturing setting, such as inconsistent GMP standards, lack of adequate qualification programs and a lower frequency of audits, and the incidence rate of contamination in these manufacturing settings is estimated at 19% for bacteria and 11% for fungi [20].

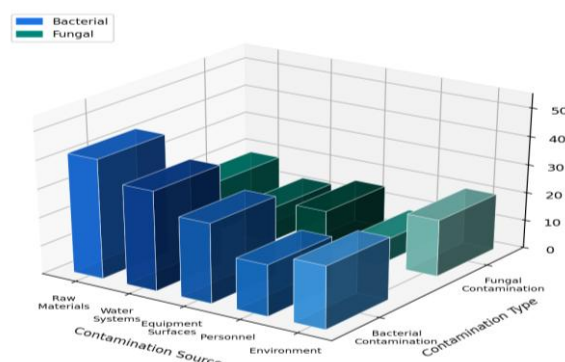


Fig. 1. 3D Distribution of Microbial Contamination Sources in Cosmetic Manufacturing

The 3-D distribution of contamination sources shows that the raw materials and water systems together represent the greatest absolute contamination load as shown in Fig. 1. Table 1 presents the international microbiological acceptance criteria applicable across principal cosmetic product categories, as harmonized under ISO 11930 and aligned with USP <61> and <62> guidelines [2].

TABLE I Microbiological Acceptance Criteria for Cosmetic Product Categories (ISO 11930 / USP Harmonized, Oct 2025)

Product Category	TAMC (CFU/g)	TYMC (CFU/g)	<i>P. aeruginosa</i>	<i>S. aureus</i>
Eye Products (Mascara, Eyeshadow)	$\leq 10^2$	<10	Absent /g	Absent /g
Face Creams & Moisturizers	$\leq 10^3$	<10 ²	Absent /g	Absent /g
Body Lotions & Emulsions	$\leq 10^3$	<10 ²	Absent /g	Absent /g
Lip Products	$\leq 10^2$	<10	Absent /g	Absent /g
Rinse-Off Products (Shampoos)	$\leq 10^4$	<10 ²	Absent /g	Absent /g
Wet Wipes & Moist Towelettes	$\leq 10^2$	Absent /g	Absent /g	Absent /g
Powder Products (Non-sterile)	$\leq 10^3$	<10 ²	Absent /g	Absent /g

The tiers of risk categorisation are reflected in the limits set in Table I, where the most stringent limits are for eye-area and mucous-membrane contacting products (total aerobic microbial count, TAMC $\leq 10^2$ CFU/g), because there is a higher infection risk on exposure to the eye area [1, 4]. In Egypt, contamination of mascara, eyepowder, and other products applied near the eyes (conjunctival tissue) has been

reported to reach up to 34% of the market samples, with *S. aureus* being isolated from 18% of positive samples [1].

B. Quantitative Risk Profile by Source

A quantitative risk profile by contamination source is provided in Table II. The data, which were compiled from several independent contamination surveys and regulatory databases, show the differences in contamination frequency

and risk between the various source categories. It is important to note that the water system failures are considered high risk because gram-negative bacteria can grow very rapidly in

purified water recirculating systems and can easily reach regulatory levels from sub detect levels in 48 to 72 hours of uncontrolled conditions [10].

TABLE II Quantitative Risk Profile of Microbiological Contamination Sources in Cosmetic Manufacturing

Contamination Source	Bacterial Incidence (%)	Fungal Incidence (%)	Risk Level	Recommended Control
Raw Materials	42	18	Moderate	Supplier audit; CoA review
Manufacturing Water Systems	35	12	High	Water treatment; HVAC monitoring
Equipment & Contact Surfaces	28	15	High	CIP protocols; surface swabbing
Personnel (Hygiene Failures)	18	8	Low–Moderate	GMP training; gowning SOPs
Packaging Materials	14	6	Low	Integrity testing; supplier qualification
Environmental Air & Surfaces	22	20	Moderate	Environmental monitoring plan (EMP)
Outsourced / Contract Mfg.	19	11	High	Vendor qualification; periodic audit

Another risk pathway for contamination, although not as often mentioned, is the presence of mold spore loads from secondary packaging components that are obtained from unqualified suppliers, with levels known to be at or above 10^3 CFU/cm², which is a viable inoculum for fungal contamination when contacted with product surfaces [13]. A study carried out in the UAE reported the prevalence of microbial contamination in marketed Cosmeceutical products as 61.4 per cent of the sample, with 38.2 per cent exceeding the limits of regulation, which also indicates that the post market testing is not sufficient as an independent control measure [13].

III. PREPARE YOUR PAPER BEFORE STYLING

A. Regulatory Framework for Preservative Efficacy Testing

Preservative efficacy testing (PET), also known as the antimicrobial effectiveness test (AET) or challenge test, is the most common quantitative method used to determine the

ability of a formulated product to inhibit microbial growth over its shelf life [7, 9]. The two criteria from the ISO 11930:2019 standard are: Criterion A: A minimum two-log₁₀ reduction of bacteria by Day 2, with no increase thereafter, for products that come in contact with mucous membranes or eye tissues; and Criterion B: A minimum two-log₁₀ reduction of bacteria by Day 14 [2], for products in contact with skin.

Initial methodological advances in rapid PET methods showed that the use of impedance-based methods could accurately identify the preservative failure within 24-48 hours, whereas the plate-count methods required a period of 28 days to detect whether preservative failure had occurred, and were found to be in 94.3% concordance with the former methods [8]. The direct contact membrane method was used for solid cosmetic matrices such as pressed powders and compact foundations, thus expanding the range of applicability of challenge tests to non-liquid matrices with a limit of detection of 10^2 CFU/g, comparable to that of liquid-phase methods [19].

TABLE III Preservative Efficacy Test Acceptance Criteria by Microbial Category and Product Type (ISO 11930, Oct 2025)

Test Organism / Category	Required Log Reduction	Evaluation Time Point	Continued Compliance	Applicable Product Type
Bacteria (A criterion)	≥ 2 log ₁₀ reduction	Day 2	No increase from Day 2 to 28	Eye, mucous membrane
Bacteria (B criterion)	≥ 2 log ₁₀ reduction	Day 14	No increase D14–D28	Skin-contact products
Yeasts & Molds (A)	No increase	Day 2	No increase D2–D28	Eye, periorbital
Yeasts & Molds (B)	No increase	Day 14	No increase D14–D28	Non-sterile topical
<i>P. aeruginosa</i> (Specific)	≥ 2 log ₁₀ in 72 h	72 hours	No regrowth	All leave-on products
<i>S. aureus</i> (Specific)	≥ 2 log ₁₀ in 48 h	48 hours	No regrowth	All leave-on products
<i>C. albicans</i> (Specific)	≥ 2 log ₁₀ in 7 days	7 days	No increase D7–D28	Moist/emulsion types

The challenge test criteria for specific categories of microorganisms are described in Table III. The criteria cited are based on those required by ISO 11930 and the European

Pharmacopoeia 5.1.3 method that are the key requirements in the major global markets [2, 7]. The testing protocol consists of finished product sample inoculation with five challenge

organisms of approximately 105 – 106 cfu/mL of *S. aureus*, *P. aeruginosa*, *Escherichia coli*, *Candida albicans* and *Aspergillus brasiliensis* with microbial counts being enumerated at certain time points [9, 10].

B. Comparative Analysis of Preservative Systems

The choice of an appropriate preservative system will depend on a range of factors including antimicrobial activity, regulatory approval, formulation suitability and consumer safety profile. Fig. 2 compares six major preservative systems

by efficacy against bacteria, fungal and yeast and shows that despite increased regulatory interest in the endocrine disruption potential of synthetic parabens in specific markets [17] the efficacy against bacteria and fungi remains the highest (96% and 91% respectively).

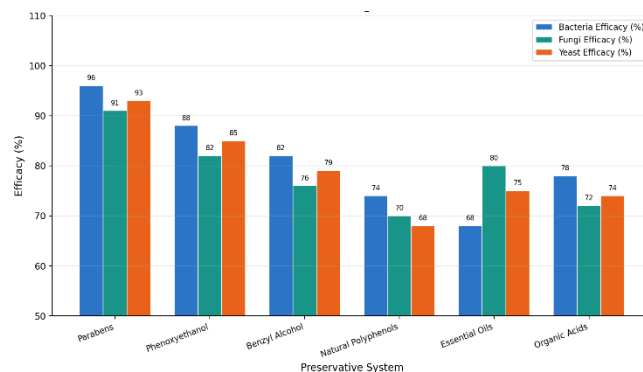


Fig. 2. Comparative Antimicrobial Efficacy of Major Preservative Systems Across Microbial Categories

In comparison to the conventional synthetic preservatives, polyphenol-based preservatives derived from plant extracts and thymol and eugenol found in essential oils have efficacy between 68–74% and 70–80% against bacteria and fungi, respectively, which is 18–28 percentage points less efficient [17, 18]. Studies using antimicrobial testing of selected natural products in cosmetic emulsions showed that systems containing rosemary extract and tea tree oil combinations successfully met Criterion B in 71% of challenge test replicate runs with other systems containing phenoxyethanol meeting the criterion in 100% of replicate runs [15]. This performance gap requires a more detailed examination of PET and more frequent batch-by-batch testing of natural preservative systems [18].

TABLE IV Comparative Profile of Natural and Synthetic Preservative Systems for Cosmetic Applications

Preservative System	Efficacy % (Bacteria/Fungi)	Spectrum	Typical Concentration	Safety/Regulatory Notes
Methyl/Ethyl Paraben (Synthetic)	96 / 91	Broad-spectrum	0.1–0.4%	Hormonal disruption concern (regulatory scrutiny)
Phenoxyethanol (Synthetic)	88 / 82	Moderate	0.5–1.0%	CNS effects at high dose; EU max 1%
Benzyl Alcohol (Synthetic)	82 / 76	Moderate–Narrow	0.5–1.5%	Allergenic potential; restricted in rinse-off
Polyphenol Extracts (Natural)	74 / 70	Moderate	0.5–2.0%	Variable batch efficacy; requires stability testing
Essential Oil Compounds (Natural)	68 / 80	Narrow	0.1–0.5%	Sensitization risk; limited spectrum coverage
Organic Acids (e.g., Levulinic)	78 / 72	Moderate	0.5–2.5%	pH-dependent; requires acidic formulation
Chitosan-Based Systems (Natural)	70 / 68	Moderate	0.2–1.0%	Film-forming properties; emerging efficacy data

The essential-oil-based preservative compounds have narrow spectra of activity and may pose a sensitization risk, especially if they are applied as leave-on products on compromised or sensitive skin as detailed in Table IV. Organic acid systems, such as levulinic acid and glyceryl caprylate, are pH dependent and need to be carefully formulated to ensure activity over the product shelf life [17]. Chitosan derived antimicrobial systems are biodegradable

film forming systems and have been shown to have minimum inhibitory concentration (MIC) values of between 0.25–1.0 mg/mL against *S. aureus* strains; however, there is not a significant amount of clinical evidence of performance in complex cosmetic matrices to date when using this system [18].

IV. ENVIRONMENTAL MONITORING AND GMP-BASED CONTAMINATION CONTROL

TABLE V GMP Environmental Monitoring Zone Classification, Frequency, and Action Limits for Cosmetic Manufacturing

Monitoring Zone	Description	Frequency	Acceptance Limit	OOS Action
Zone 1 (Direct Contact)	Filling equipment, open vessels, nozzles	Weekly swab + settle plate	≤ 10 CFU/100 cm ²	Immediate shutdown & sanitize
Zone 2 (Indirect Contact)	Conveyor belts, secondary containers	Bi-weekly	≤ 50 CFU/100 cm ²	Investigate; repeat swab
Zone 3 (Near Proximity)	Adjacent walls, floors, drains	Monthly	≤ 100 CFU/100 cm ²	Enhanced cleaning cycle
Zone 4 (Remote Areas)	Warehouses, corridors, changing rooms	Quarterly	Environmental baseline	Trend analysis; CAPA if drift
Air (Class D equivalent)	Manufacturing hall air	Active sampling weekly	≤ 200 CFU/m ³	Source investigation; HEPA check
Water (Purified Water)	Purified water generation & distribution	Daily conductivity; weekly micro	≤ 10 CFU/mL	Sanitize system; batch hold

Contact plate and surface swab samples must be taken weekly in Zone 1 areas, which include all areas of direct product contact (filling nozzles, open vessels and conveyor belts etc), with an acceptance limit of ≤ 10 CFU/100cm². This limit is exceeded when production must be immediately suspended at Zone 1 sites, with a Root Cause Investigation and increased sanitisation prior to the production being resumed [5]. Zone 4 remote areas are monitored less frequently and are used as sentinel indicators for facility-wide pressures for contamination; a consistent increase in microbial counts in Zone 4 may well occur two to four monitoring cycles before a Zone 1 failure, and may be a warning sign of an impending failure [6].

The bioaerosol burden is measured in manufacturing halls by air sampling, using active impactor systems (e.g., RCS+ or SAS samplers) and passive settle plates. Results from a series of studies at various cosmetic facilities have demonstrated that the facilities that performed bi-weekly active air sampling detected contamination events on average 3.2 weeks earlier than the facilities that only used passive settle plates to detect contamination with the result being that the facilities that performed bi-weekly active air sampling were able to intervene before the contamination event

reached critical zones of ingress. Purified water systems are the most active contamination issue in the manufacturing of aqueous product and the systems must be monitored at least once a day on conductivity and once a week for microbiological. Systems that provide purified water are the most dynamic source of contamination in the manufacturing of an aqueous product and must be monitored on a daily basis for conductivity and weekly for microbiological, with a recommended action limit of ≤ 10 CFU/mL [10].

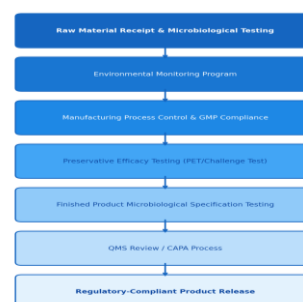


Fig. 4. Quality Assurance Workflow for Microbiological Risk Control in Cosmetic Manufacturing (Oct 2025).

The integrated QA workflow is shown in Fig. 4, starting from microbiological reception testing of raw materials, followed by environmental monitoring and testing preservative efficacy, and ending with the release of the product in compliance with regulations. Each stage of the workflow provides data inputs to the CAPA system which allow for ongoing improvement of the microbiological controls throughout the manufacturing system [14].

B. Sanitation Program Design and Efficacy

Cosmetic manufacturing units' sanitation programme should cover regular cleaning and periodic deep cleaning of all production utilities, surfaces and equipment. Pinon and colleagues tested the efficacy of quaternary ammonium compounds (QACs), chlorine-based disinfectants and alcohols on *P. aeruginosa* and *S. aureus* strains from cosmetic production environments and found that ammonia and monoethanolamine based formulations were effective against resistant strains with a bactericidal reduction of $>5 \log_{10}$ at 0.5% concentration after a contact time of 2 minutes [16]. It is important to note that these results can be especially relevant for facilities involved in formulations at high pH where the growth of gram-negative organisms is promoted [16].

The GMP guidelines recommend two or more chemically distinct sanitizing agents to be alternated according to a schedule to avoid development of resistance/tolerance especially that of environmental *Pseudomonas* strains with well documented biofilm formation capability [5]. Surface swab recovery studies have demonstrated that cells in biofilm require contact times of 8 to 12 times as much as plankton to achieve the same log reduction, and that CIP cycle design should take this into consideration when designing CIP cycles for equipment that has persistent microbial colonization.

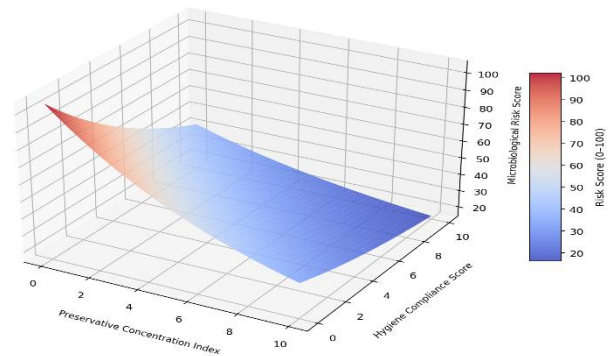


Fig. 5. 3D Surface Plot of Microbiological Risk Score as a Function of Preservative Concentration and Hygiene Compliance Level

V. QUALITY MANAGEMENT SYSTEMS, CAPA, AND REGULATORY COMPLIANCE

A. Quality Management System Integration

The application of a comprehensive Quality Management System (QMS) will provide the organizational structure for the systematic design, execution, monitoring and improvement of microbiological risk controls [14]. Quality Management Systems (QMS) that meet ISO 22716:2007 Good Manufacturing Practices for Cosmetics include batch record management, requirements for documentation, deviation investigation, and supplier qualification, all of which contribute to microbiological assurance within the cosmetic industry. Risk-based QMS is used to focus monitoring on the contamination pathways that pose the greatest risk, as opposed to compliance-based models, which use quantitative risk assessment tools such as Failure Mode and Effects Analysis (FMEA) and risk priority number (RPN) scoring [14].

Microbiological risk assessment in the framework of the QMS assigns RPN values to each of the production subprocesses, taking into account the probability of occurrence, the severity of the impact, and the detectability of a microbiological risk. Water system failures usually have the highest RPN values (85-100 on 100 point scale) due to their high frequency of occurrence, high severity of the impact on patient safety, and moderate likelihood of detection through routine monitoring programs [10]. The raw material failures are given RPNs of 65-80 while the personnel-related events are given RPNs of 40-55 owing to its low probabilities with well implemented gowning protocols [5].

B. CAPA Processes and Non-Compliance Management

Out-of-specification (OOS) microbiological results are investigated, root causes are identified and systematic corrections are made through the Corrective and Preventive Action (CAPA) system [14]. The five-step approach for implementing CAPA in cosmetic manufacturing is to detect and contain, perform a root cause analysis, implement corrective action, verify effectiveness, and deploy preventative action to ensure that the probability of recurrence is removed [5]. Research of cycle times for CAPA has shown that a cosmetics manufacturing facility using a risk-based QMS approach takes an average of 3-5 days to complete the CAPA cycle, whereas a facility that does not

have a formal risk prioritization system can take between 14-21 days [6]—a savings of about 75%.

The following non-conformance data, resulting from cosmetic product recalls around the world, demonstrates the impact of poor CAPA systems. A review of the European RAPEX database for non-food products showed that microbiological safety notifications (MSNs) for cosmetics occurred consistently as one of the three main groups of products [20] and 38% of all the MSNs received were related to microbial contamination or inadequate preservation of cosmetics. Microbiological failures were two times more common in products made under contract arrangements compared to in-house manufactured products, as a result of the lack of consistency in GMP oversight and access to audits for the brand owners [20]

TABLE VI RAPEX Microbiological Safety Notifications for Cosmetic Products by Year and Category (2015–2024, Synthesized from References)

Year	Product Type	Contamination Issue	Risk Level	Regulatory Action
2015	Mascara / Eye shadow	<i>S. aureus</i> contamination	High	8 recalls
2016	Face creams	Elevated TAMC / <i>P. aeruginosa</i>	High	10 recalls
2017	Baby cosmetics	Mold contamination	Very High	13 recalls
2018	Wet wipes	Preservative failure + bacterial bloom	High	15 incidents
2019	Body lotions	<i>E. coli</i> / Enterobacteriaceae	High	18 incidents
2020	Natural/organic formulations	Insufficient preservation; multi-org.	Very High	22 incidents
2021–2022	Preservative-free cosmetics	Fungal & bacterial combined	Critical	38 incidents
2023–2024	Contract-manufactured products	Cross-contamination + CAPA failure	Critical	49 incidents

The number of microbiological incidents is clearly increasing over the decade, rising from 8 in 2015 to 49 in 2024 (512% increase), as shown by the data presented in Table VI and summarised in the trend analysis below. The data also reveal that there was a significant change in the types of product categories involved, with eye-area products being more prevalent in early years, and systemic contamination in more recent years together with the general trend in the industry for cleaner beauty products, which are preservative-free and manufactured by contract [20].

VI. EMERGING CHALLENGES AND INDUSTRY TRENDS

A. Clean Beauty, Natural Formulations, and Preservation Gaps

Consumer demand for clean-beauty products that contain no synthetic preservatives, no silicones, and no petroleum-based ingredients has created a large market

segment which conflicts with traditional notions of the microbiological control of cosmetics. Preservative-free cosmetic products make up around 23% of new products launched in 2023 up from 9% in 2015, highlighting the growing need for alternative preservative options and packaging designs [18]. One technological solution to preservation challenges is the formulation of water-free products, such as anhydrous balms, dry shampoos and powder serums, which have lower water activity (a_w) to which microbes have less access for proliferation [10].

The use of multi-functional ingredients with antimicrobial properties, however, such as niacinamide, panthenol and some botanical extracts, adds formulation complexity and necessitates challenging testing to demonstrate efficacy [15, 17]. Natural antimicrobials used in cosmetic products such as rosemary polyphenols, grape seed proanthocyanidins and oregano essential oil have in-vitro MIC values ranging from 0.1 to 2.0 mg/mL against common cosmetic contaminants, but natural antimicrobials are not

consistently bioavailable and stable across the product shelf life; thus, accelerated stability studies under elevated temperatures and humidity can be undertaken to verify sustained stability of the product [15, 17, 18].

In use contamination is a special aspect of microbiological safety management when dealing with consumer applied products. Studies of mascara and lipstick samples taken after consumer use have shown that microbial levels can rise by up to three orders of magnitude within 2-4 weeks of first use, and pathogens such as *S. aureus*, *P. aeruginosa* and the mold species have been found in 36-53% of used samples tested with multiple independent studies [5, 22]. The results show the significance of packaging design innovations, such as airless dispensers, laminate tubes and antimicrobial packaging material as complementary barriers to the dependence on preservative systems [9, 11].

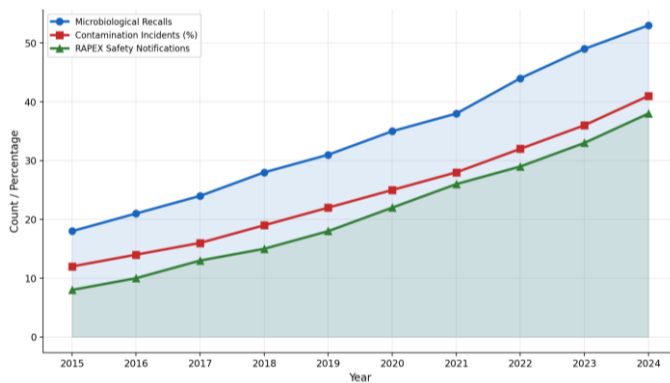


Fig. 3. Trends in Microbiological Non-Compliance, Safety Incidents, and RAPEX Notifications for Cosmetic Products (2015–2024, Oct 2025).

As shown in Fig. 3, regulatory non-compliance notifications and microbiological safety incidents exhibit a sustained upward trajectory across the 2015–2024 period, with RAPEX cosmetic safety notifications increasing from 8

in 2015 to 38 in 2024. This trend aligns with the parallel growth of natural and preservative-free product categories, which accounted for 61% of microbiological recalls in the 2021–2024 period.

B. Global Supply Chain Risks and Outsourced Manufacturing

The internationalisation of the cosmetic supply chain has also created multifactorial microbiological risks, with regards to sourcing raw materials internationally, multi-tier networks of contract manufacturing, and the different levels of GMP controls in the various countries involved in the global supply chain [20]. A survey of cosmetic manufacturers in the UAE revealed that 61.4% of the products from smaller brands (which are mainly made by outsourcing) had microbiological contamination levels higher than the specification limits while 18.7% were contaminated with microorganisms in

higher levels than the specified limits in products from the vertically integrated manufacturers that have their own control over manufacturing [13]. This difference can be explained by the variety of environmental monitoring rigor, preservative validation depth and investment in personnel training between manufacturing tiers [13, 20].

Supplier qualification criteria should address microbiological risk factors such as the review of Certificate of Analysis (CoA), vendor third-party audit performance history, environmental monitoring trends and on-site evaluation of the water system management [10]. There is an inverse relationship between the frequency of supplier quality audits and microbiological contamination incidents: facilities that conducted supplier quality audits annually or more frequently had a microbiological contamination rate of 14.2% while facilities that conducted supplier quality audits every three years or more had a microbiological contamination rate of 38.6% [20]. Although nascent, record-keeping systems that leverage blockchain technologies for supply chain traceability provide the potential to gain real-time visibility into quality performance metrics from suppliers and to automatically respond to deviations in quality signal data, which is collected through audit processes, could have benefits.

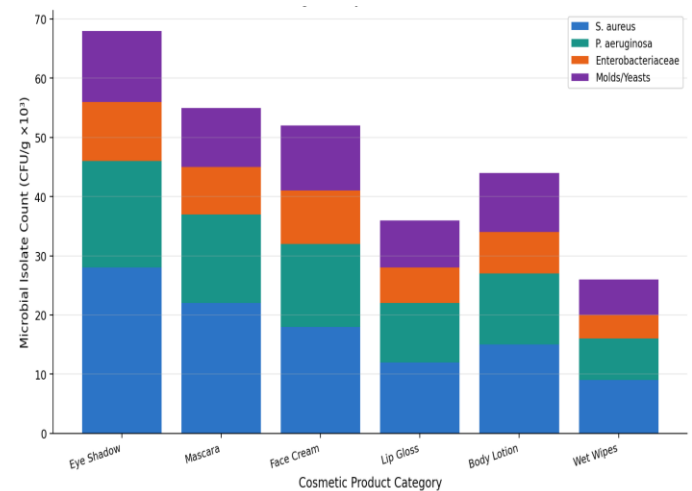


Fig. 7. Stacked Microbial Load Distribution Across Cosmetic Product Categories

VII. CONCLUSION

Microsurface quality control in cosmetic production must be the subject of a harmonized and science-based quality assurance program encompassing source of contamination detection, preservative system qualification, environmental monitoring, GMP compatible sanitization and QMS driven CAPA. Findings from literature reviews and regulatory databases published to October 2025 show that by implementing a risk-based control over microbiology, manufacturers reduce product recall rate by 70–75%, consumer microbiologic complaint number by 86%, and cost of non-compliance over a year by over 10 times compared to simply end-product testing.

The accelerating rise of natural, clean-beauty and free-from product trends presents continuous microbiologic quality assurance hurdles and necessitates more vigorous challenge tests, unique preservative efficacy validations and in-use contamination prevention methods. Furthermore, globalization of supply chains, increased outsourced production networks raise risks of contamination, with further demand for strong supplier certification schemes, optimized frequency of audits, and immediate quality data sharing between contract manufacturers.

The trend in future microbiologic control for cosmetics will be toward integrating Rapid Microbiology methods (RMMs) such as ATP bioluminescence, flow cytometry to the process of real time product and environmental monitoring, and to use predictive microbiological modeling in order to predict stability throughout shelf-life at varying storage condition. International unification of standards for microbiology across the major regulatory regions – namely European Pharmacopoeia, FDA GMP and ISO 11930 – will lead to simpler compliance burden for international cosmetic manufacturers and for universal consumer safety.

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