

CALIFORNIA PROPOSITION 65

Prop 65 Compliance *for Calcium Supplements*

System-Based Compliance. Not Just Testing.

Presented by: **Prop65Compliance.com**

Compliance Management by **Consultare Inc. Group**

Powered by **SystemsBuilder.pro**



5,000+

NOVs in 2025

~53%

Food & Supp. Share

W H Y

Why This Matters

California Prop 65 applies to every calcium supplement sold in the state.

WARNING

This product can expose you to chemicals including lead, known to the State of California to cause cancer and birth defects or other reproductive harm.

— P65Warnings.ca.gov

Supplements ≠ Exempt



Enforcement Is Aggressive

Private attorneys ('bounty hunters') drive most actions — calcium has been a target category since the late 1990s.



Penalties Are Real

Settlements, attorney fees, relabeling, reformulation, and shelf removal stack up fast.



Applies to All Supplements

No exemption for natural, mineral-source, or small brands. Sold in California = in scope.



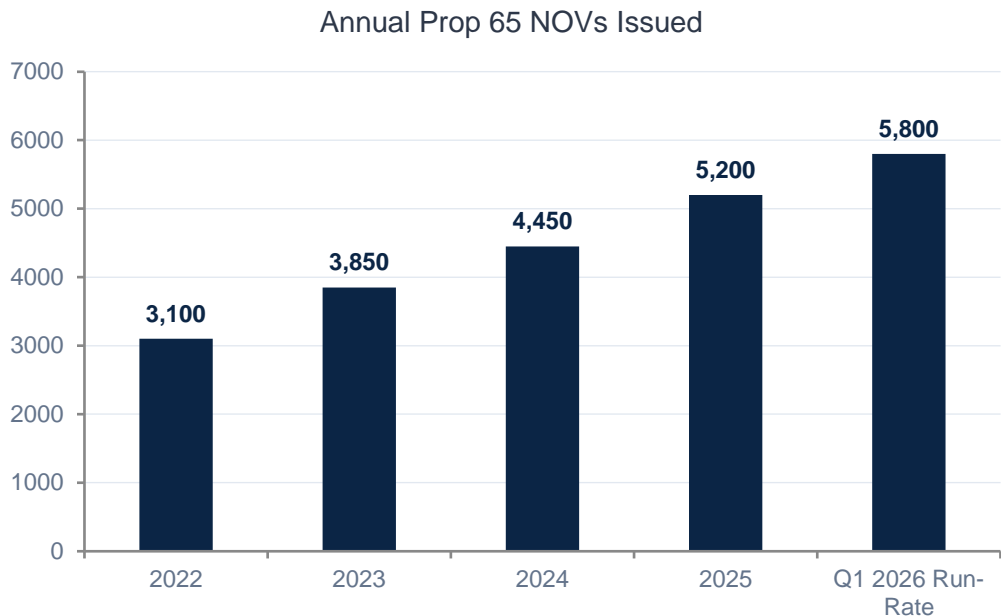
Documentation Is Your Defense

Without a system, companies settle. A defensible record ends threats cheaply.

WHY

Prop 65 Enforcement Trends (2024–2026)

Enforcement is accelerating — not slowing down.



Source: OAG 60-Day Notice database; Bureau Veritas CPS quarterly summaries.

~53%

Food & Supplements

Largest single category of Prop 65 enforcement in Q4 2025.

~\$98M

2026 Settlements

Record enforcement activity — majority paid to attorneys.

Lead #1

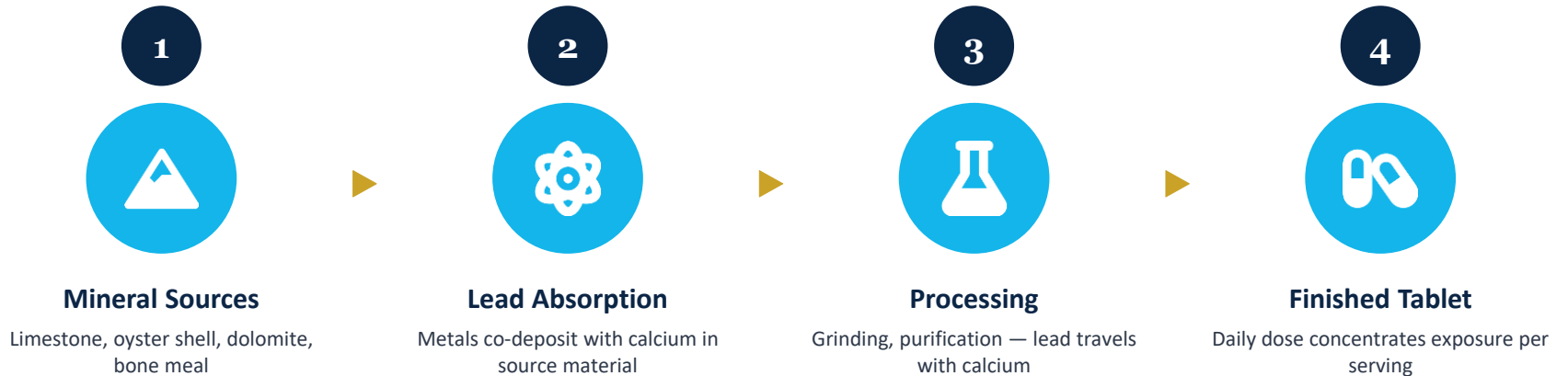
Calcium Category

Lead-focused lawsuits target mineral-source supplements most.

WHY

Why Calcium Supplements Are at Risk

Lead enters mineral calcium sources naturally. Processing concentrates it.



Natural mineral sourcing does not eliminate heavy-metal exposure risk.

Lead is a listed Prop 65 chemical with a 0.5 µg/day MADL. Even naturally-occurring lead above ~0.8 µg/g of calcium exceeds the recognized safe-harbor allowance.

W H Y

Business Impact of Non-Compliance

A Prop 65 action hits the balance sheet long before a verdict.



60-Day Notice of Violation

Plaintiff's attorney files with the AG; clock starts on response.



Settlement Exposure

Historic calcium-supplement settlements ~\$48K avg; recent actions \$20K–\$150K+, plus fees.



Relabeling & Reformulation

Product pulled, warning labels added, source minerals re-evaluated.



Retail & Distributor Pressure

Amazon, Costco, CVS demand evidence of compliance before reinstatement.

Most companies settle — not because they're guilty, but because their documentation is weak.

WHAT

Why Prop65Compliance.com

Compliance-focused. Not a law firm. System-based — not one-time testing.



Compliance-Focused

We don't litigate — we build the system that prevents litigation.



System-Based Approach

Testing alone doesn't protect you. A documented program does.



Managed by Consultare Inc. Group

Operational oversight from a dedicated compliance management team.



Built on SystemsBuilder.pro

Artifact-based system, document control, and AI-assisted workflows.

OUR PROMISE

*We build and manage
your defensible
compliance system.*

*So when a 60-day notice arrives,
you already have the answers.*

WHAT

What We Deliver

An end-to-end Prop 65 compliance program — not a one-time report.



**Product Risk
Assessment**



**Heavy Metal
Test Oversight**



**Exposure
Evaluation**



**Compliance
Determination**



**Warning Label
Strategy**



**Supplier
Compliance Program**



**Documentation
System**



**Ongoing
Monitoring**

Each component is documented, traceable, and audit-ready.

WHAT

Core Technical Components

The compliance stack underneath every determination we issue.



Heavy Metal Testing

Oversight of Lead (MADL 0.5 µg/day), Cadmium (MADL 4.1 µg/day), and Arsenic (MADL 10 µg/day) at ISO 17025 labs.



Exposure vs MADL Evaluation

Serving-size, daily-dose, and calcium-naturally-occurring allowance calculations to determine warning requirement.



Supplier COA Verification

Incoming mineral-source Certificates of Analysis cross-checked against screening thresholds per lot.



Batch-Level Compliance Review

Every lot is logged, reviewed, and tied to a compliance determination on file.



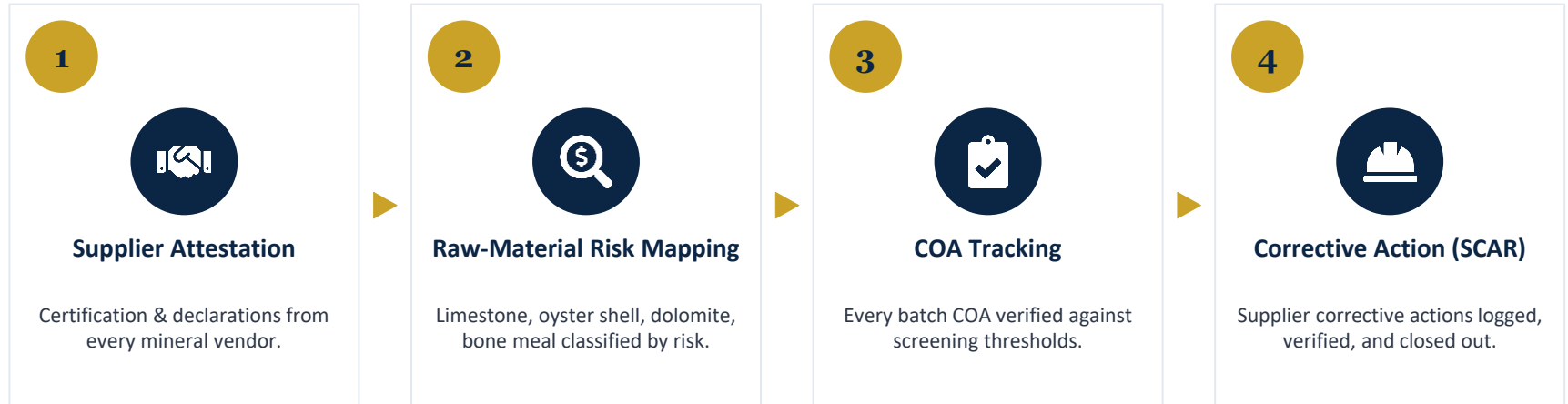
Warning Label Determination

Clear 'warn vs no-warn' logic documented and defensible against private enforcement.

WHAT

Supply-Chain Compliance Control

Prevent the issue upstream — before it reaches your label.



Prevent exposure issues before they reach the consumer — and the courtroom.

HOW

The SystemsBuilder Approach

Artifact-based compliance — pay for structure, not repetition.

ARTIFACTS vs RECORDS



You pay for the structure — not the records.

Build once. Use forever.

Example:

ARTIFACT (you pay)

Testing Program

One document defining how all calcium testing is conducted, reviewed, and documented.

↓ Generates unlimited ↓

RECORDS (no added cost)

Unlimited Batch Test Results

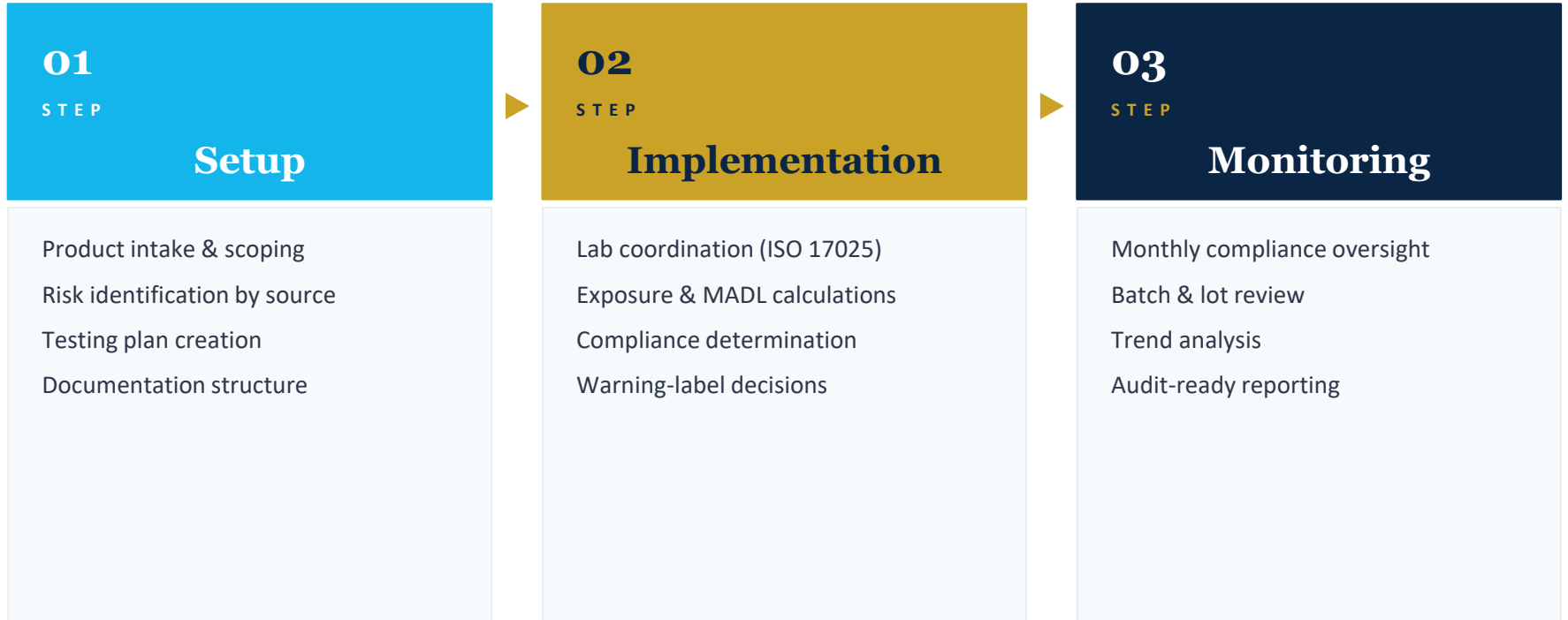
Every lot tested fills out the same framework — no new artifact needed.

→ **Scalable, predictable, cost-efficient.**

HOW

How It Works

A three-phase program. Setup once. Monitor continuously.



Setup Pricing — One-Time Investment

Build your defensible Prop 65 compliance system.

COMPLIANCE SYSTEM SETUP

\$1,500

up to 3 finished products (SKUs)

+ \$150

each additional SKU

One-time investment to build your system.

SETUP INCLUDES

- ✓ Product & formula risk assessment
- ✓ Testing program design (lead, cadmium, arsenic)
- ✓ Exposure evaluation framework
- ✓ Documentation system setup
- ✓ Compliance determination structure

PRICING

Monthly Monitoring — Ongoing Oversight

Continuous compliance. Keep your system alive.

ONGOING COMPLIANCE OVERSIGHT

\$500


per month — up to 7 finished products

+ \$50 / month

per additional SKU

Keeps you continuously compliant.

MONITORING INCLUDES

-  Batch / lot test review
-  Compliance verification
-  Monthly reporting
-  Trend analysis

Cancel anytime. No long-term contracts.

PRICING

Testing Monitoring Fees

Per-event oversight — pay only when your product is tested.

\$35

per testing monitoring event

Per lot / batch — covers lab-report review, threshold comparison, compliance determination & documentation update.

WHAT THE \$35 COVERS

- Lab report review
- Threshold comparison vs MADL (0.5 µg/day lead)
- Compliance determination
- Documentation update

IMPORTANT — LAB FEE EXCLUSION

Laboratory testing fees are NOT included. Testing is conducted by independent ISO 17025 accredited laboratories. All lab costs are billed directly to the client by the laboratory.

We provide oversight and compliance review — not laboratory testing services.

Pay only for actual testing events • No markup on lab fees • Independent results ensure defensibility

WHAT

What You Receive

Every client gets a defensible, audit-ready document package.



Batch Compliance Review Reports

Per-lot review with pass/fail determination, threshold comparison, and reviewer sign-off.



Monthly Summary Reports

Rolling snapshot of all testing events, compliance status, and open action items.



Compliance Monitoring Logs

Date-stamped log of every decision made — the backbone of defensibility.



Supplier Tracking Records

Attestations, COAs, risk ratings, and corrective actions by supplier.



Audit-Ready Documentation

Packaged for OAG inquiries, retailer audits, and legal counsel on 24-hour notice.

HOW

Built for Defensibility

Documentation is the difference between a quick close-out and a six-figure settlement.



Documented Due Diligence

Every decision has a record, a reviewer, and a date.



Verified Lab Testing

ISO 17025 independent results — no conflicts of interest.



Traceable Decisions

Supplier → material → batch → determination — fully linked.



Structured System

Not ad-hoc — a real management system reviewers recognize.

Critical for lawsuits • Retail audits • Regulatory inquiries

OPTION

DIY Option — SystemsBuilder.pro

Prefer to manage it yourself? The same artifact library, à la carte.

COMMUNITY LIBRARY

\$1
per artifact

Build your own system on your own terms.

SystemsBuilder.pro

The graphic features a dark blue background with a gold header bar. The text is centered and uses a mix of bold sans-serif and serif fonts. A horizontal line is positioned below the price.

ACCESS THE FULL LIBRARY

-  Prop 65 Programs
-  Policies
-  Procedures (SOPs)
-  Forms (Artifacts)
-  Logs & Templates

Managed Service vs. DIY

Same system. Different execution — you choose who drives.

MANAGED SERVICE

by Consultare Inc. Group

Hands-off compliance execution

Expert-managed monitoring

Monthly reporting delivered

Best for: growing brands without in-house QA capacity

DIY (SystemsBuilder)

at SystemsBuilder.pro

Self-managed execution

\$1-per-artifact library access

Internal team runs the program

Best for: teams with existing compliance capability

Same system. Same artifacts. Same defensibility. — You choose who operates it.

BOTTOM LINE

Your Risk Profile

Every one of these factors increases your exposure — independently.



#1 ENFORCEMENT TARGET

Supplement Category

Food & supplements = largest Prop 65 enforcement category in 2025–2026 (~53%).



TOP LITIGATION DRIVER

Lead Exposure

Lead is the #1 chemical cited in supplement NOV's; calcium has been targeted since 1996.



NATURAL EXPOSURE RISK

Calcium Supplements

Limestone, oyster shell, bone meal, and dolomite all carry naturally-occurring lead.



STRICT ENVIRONMENT

California

Most aggressive private-enforcement regime in the United States.

Your product is already in a high-risk category — even if you've done nothing wrong.

CALL TO ACTION

Don't wait for a 60-Day Notice.

Start your Prop 65 compliance system today.



MANAGED COMPLIANCE

Let us manage it for you.

- End-to-end Prop 65 system setup
- Ongoing monitoring & oversight
- Audit-ready documentation
- Expert-managed execution



DIY LIBRARY

Build it yourself.

- \$1-per-artifact library access
- Community programs & policies
- Forms, logs & templates
- Run it your way, in-house

"Build it yourself — or let us manage it for you."

Prop65Compliance.com • SystemsBuilder.pro