

Prop 65 Compliance

for Cinnamon

System-Based Compliance. Not Just Testing.

Presented by: Prop65Compliance.com
Compliance Management by Consultare Inc. Group
Powered by SystemsBuilder.pro



5,110

ppm

Peak Lead — WanaBana (2023)

560+

children

CDC reports of lead poisoning

Why This Matters

California Prop 65 applies to every spice — and cinnamon now sits at the center of the most public lead-in-food incident in a decade.

WARNING

Consuming this product can expose you to lead, which is known to the State of California to cause cancer, birth defects, or other reproductive harm.

— P65Warnings.ca.gov/food

S p i c e ≠ e x e m p t

"Naturally occurring" doesn't end the inquiry. Lead found at any level above the 0.5 µg/day MADL still triggers Prop 65 warning duties.

WanaBana Set the Precedent

The 2023–24 cinnamon-applesauce recall produced 560+ pediatric lead-poisoning reports (CDC). Cinnamon is now the case study every plaintiff cites.

Children Are the Consumers

Cinnamon is in baby food, applesauce, oatmeal, cereal, and toddler snacks. 'Lead in a product aimed at children' is the strongest fact pattern under Prop 65.

Lead Chromate Adulteration

Lead chromate has been illegally added to spices to deepen color and increase weight — a documented contamination route that finished-product testing alone may miss.

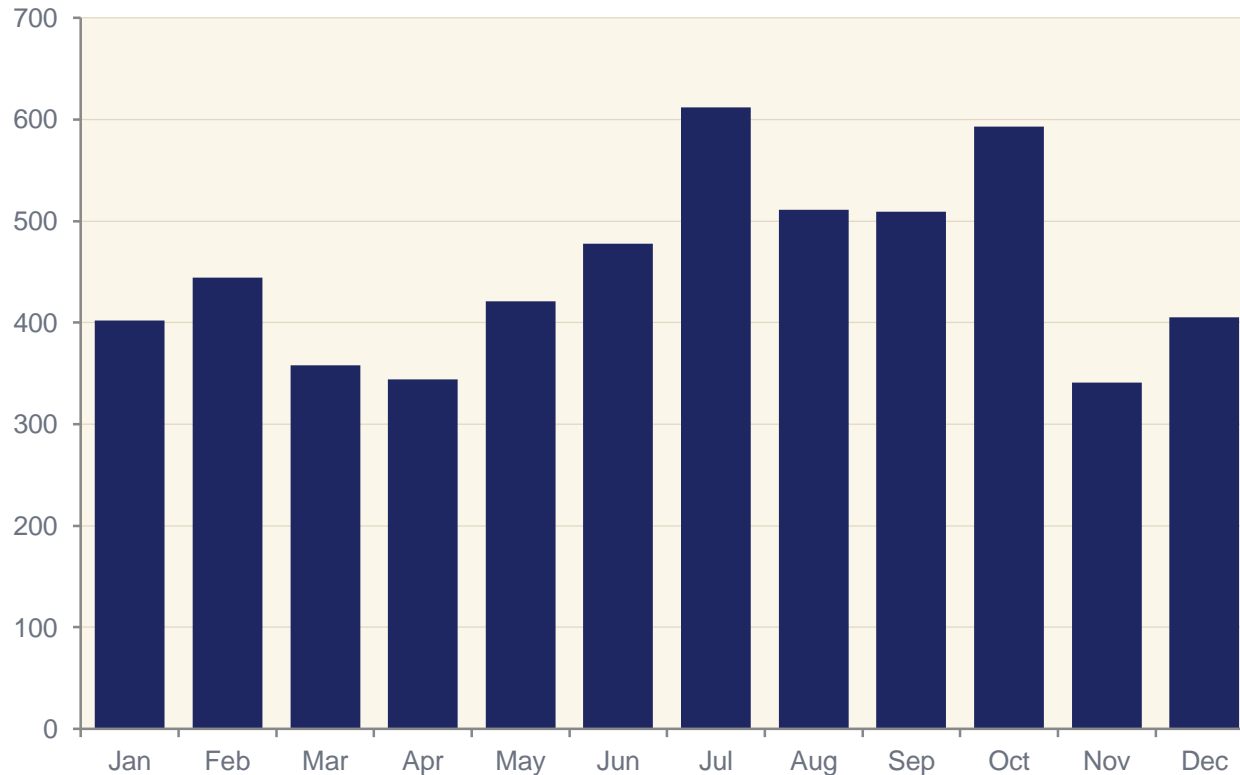
Documentation Is Your Defense

Without a compliance system, most companies settle. A defensible record is what ends threats cheaply.

Prop 65 Enforcement Trends (2024–2026)

Heavy-metal NOVs are climbing — and cinnamon is one of the most-watched food categories.

Monthly Prop 65 NOVs (illustrative, 2025)



Source: OAG 60-Day Notice database; Intertek monthly tallies; Prop 65 Clearinghouse.

46%

of all NOVs cite lead

Lead Is the #1 Driver

Lead remains the single most-cited Prop 65 chemical in food and consumer goods enforcement (Intertek, Mar–Apr 2025).

16+

FDA cinnamon recalls

Cinnamon Recall Surge

Since the March 2024 FDA alert, 16+ ground cinnamon products have been recalled for elevated lead — La Fiesta, Marcum, MK, Swad, Supreme Tradition, Durra, and more.

Cinnamon = Target

Sri Lanka · Vietnam · Indonesia · China · Ecuador

FDA's WanaBana investigation traced cinnamon-contaminated puree to Ecuador. Ground cinnamon at retail has tested 2.0–20 ppm lead. AG and CDC both remain actively engaged.

Why Cinnamon Is at Risk

Every step in the cinnamon supply chain adds a contamination pathway — and many end-products are consumed by children.

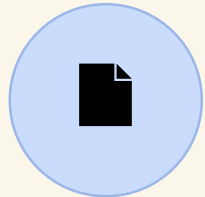


Cinnamon inherits risk from origin, drying, AND adulteration — any single step can trigger a 60-Day Notice.

⚠ FDA-recalled ground cinnamon has tested 2.0–20 ppm lead at retail. The cinnamon used in WanaBana puree tested 2,270–5,110 ppm. The Prop 65 lead MADL is 0.5 µg/day.

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; the response clock starts immediately.



Settlement Exposure

Typical food settlements run \$20K–\$100K+ per action — cinnamon cases climb higher when cases involve children.



Reputational Damage

After WanaBana, any cinnamon-and-lead headline draws media, AG press releases, and pediatrician advisories.



Retailer Delisting

Grocery, club, and discount buyers now require cinnamon supplier attestations — many delist after a single NOV.

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

W H A T

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.



O U R P R O M I S E

*We build and manage
your defensible
compliance system.*

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

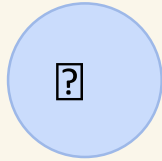
W H A T

What We Deliver

An end-to-end Prop 65 compliance program for cinnamon importers, processors, and finished-product brands — not a one-time report.



**SKU & Lot Risk
Assessment**



**Lead & Heavy-Metal
Testing Oversight**



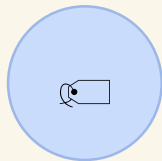
**Adulteration
Screening (Cr⁶⁺)**



**Exposure & MADL
Evaluation**



**Compliance
Determination**



**Warning Label
Strategy**



**Supplier
Compliance Program**



**Documentation
System**

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

Core Technical Components

The compliance stack underneath every determination we issue for cinnamon products.



Lead & Heavy Metals Testing

Finished-cinnamon testing for lead, cadmium, arsenic & chromium at ISO 17025 labs — benchmarked against the 0.5 µg/day MADL and FDA action levels.



Lead Chromate Adulteration Screening

Targeted Cr(VI) and chromate screening — the documented adulteration route in the WanaBana 2023 cinnamon supply chain.



Supplier COA & Origin Verification

Incoming cinnamon-bark and ground-cinnamon COAs cross-checked against country-of-origin risk thresholds (Sri Lanka, Vietnam, Indonesia, China, Ecuador).



Batch / Lot Compliance Review

Every imported lot is logged, reviewed, and tied to a compliance determination on file — including blend-component traceability.



Exposure vs MADL Evaluation

Serving-size and daily-intake calculations against the 0.5 µg/day lead MADL — with extra weight given to child-targeted finished products.

Supply-Chain Compliance Control

Prevent the issue upstream — before it reaches your label.



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

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)

Cinnamon Lead Testing Program

One document that defines how all lead, heavy-metal, and chromate-adulteration testing is scoped, conducted, reviewed, and documented across every cinnamon SKU.

↓ Generates unlimited ↓

RECORDS (no added cost)

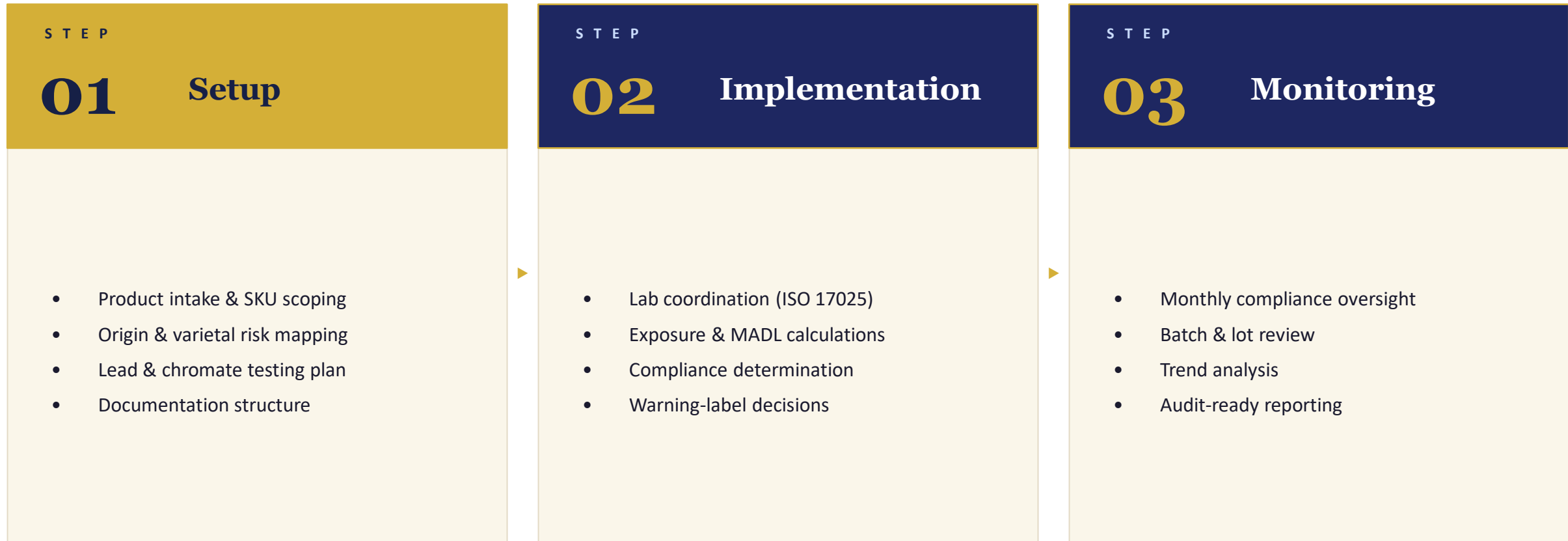
Unlimited Batch Test Results

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

→ Scalable, predictable, cost-efficient.

How It Works

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



Setup Pricing — One-Time Investment

Build your defensible Prop 65 compliance system for cinnamon products.

COMPLIANCE SYSTEM SETUP

\$1,500

up to 3 finished products

+ \$150

each additional finished product

One-time investment to build your system.

S E T U P I N C L U D E S

- ✓ Risk assessment by SKU and origin (Cassia / Ceylon)
- ✓ Lead & chromate testing program design
- ✓ Exposure evaluation framework (incl. child-targeted SKUs)
- ✓ 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 finished product

Keeps you continuously compliant.

MONITORING INCLUDES

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

Cancel anytime. No long-term contracts.

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 / NSRL
- 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 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.



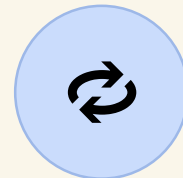
Monthly Summary Reports

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 cinnamon supplier.



Audit-Ready Documentation

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

H O W

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.



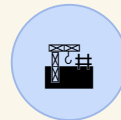
Verified Lab Testing

ISO 17025 independent results — no conflicts of interest.



Traceable Decisions

Supplier → lot → blend → finished product → determination.



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

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.

Your Risk Profile

Every one of these factors increases your exposure — independently.

LANDMARK PRECEDENT



WanaBana 2023

FDA traced 5,110 ppm lead in cinnamon used in apple-cinnamon puree — 200× the FDA's draft action level. CDC tracked 560+ child blood-lead reports. Plaintiffs now have a roadmap.

TOP LITIGATION DRIVER



Lead

Lead is the single most-cited Prop 65 chemical (~46% of NOV's). Even trace cinnamon levels above the 0.5 µg/day MADL trigger warning duties.

AMPLIFYING FACTOR



Children As Consumers

Cinnamon is a staple in baby food, oatmeal, applesauce, and toddler snacks. Lead in a child-targeted product is the strongest Prop 65 fact pattern.

STRICT ENVIRONMENT



California

Most aggressive private-enforcement regime in the U.S. — with active FDA, CDC, and AG involvement on cinnamon specifically since 2023.

⚠ 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 for cinnamon 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."

