

CALIFORNIA PROPOSITION 65

# Prop 65 Compliance for Coconut Oil

*Food, Cosmetic, or Both — Your Risk Profile Is Unique.*

Presented by: [Prop65Compliance.com](http://Prop65Compliance.com)

Compliance Management by [Consultare Inc. Group](#)

Powered by [SystemsBuilder.pro](#)



**Lead Cd**

**As**

Heavy Metals

**~38%**

Food + Supp

# Why This Matters

Coconut oil touches multiple Prop 65 enforcement categories at once.



## ⚠️ WARNING

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

— Typical heavy-metal food warning

**“Natural” ≠ Exempt**



### Tropical Soil Carries Heavy Metals

Coconut trees absorb lead, cadmium, and arsenic from soil over decades of growth — concentrated into the oil during pressing.



### Food + Cosmetic Dual Use

Same SKU often sold as cooking oil AND skin/hair product. Different use cases = different exposure math = different warnings.



### Packaging Adds Its Own Chemicals

Plastic bottles (BPA/BPS), jar lid liners, and printing inks are independently regulated Prop 65 exposures.



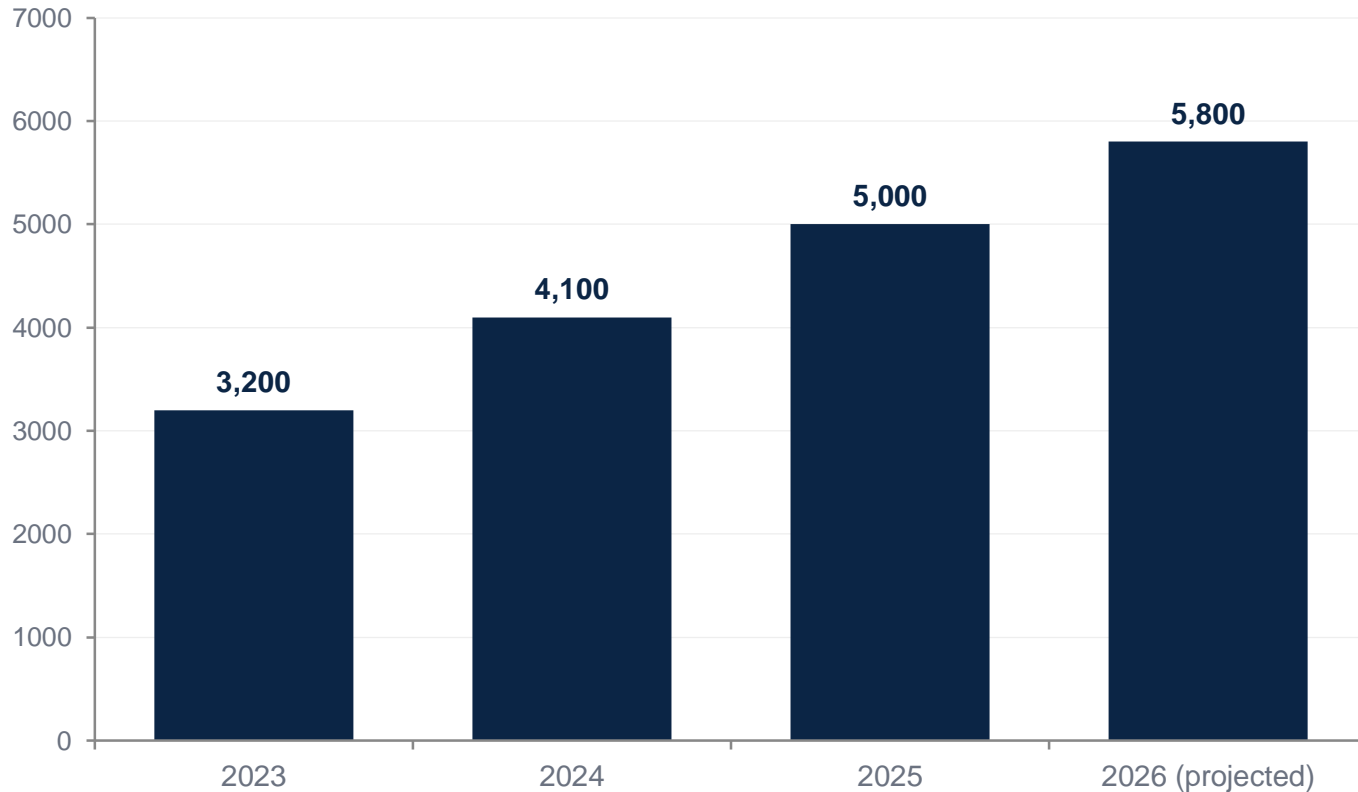
### Documentation Is Your Defense

Without a compliance system, most brands settle. A defensible record is what closes a 60-day notice cheaply.

# Prop 65 Enforcement Trends (2023–2026)

Plant oils and seed-based products are a recurring target set.

Annual Prop 65 NOVs Issued (All Categories)



Source: OAG 60-Day Notice database; industry-category tallies.

~38%

### Food & Supplements

Largest single category of Prop 65 enforcement — oils fall squarely inside.

~\$86M

### 2026 Settlements

Record enforcement activity — majority of payments go to plaintiff attorneys.

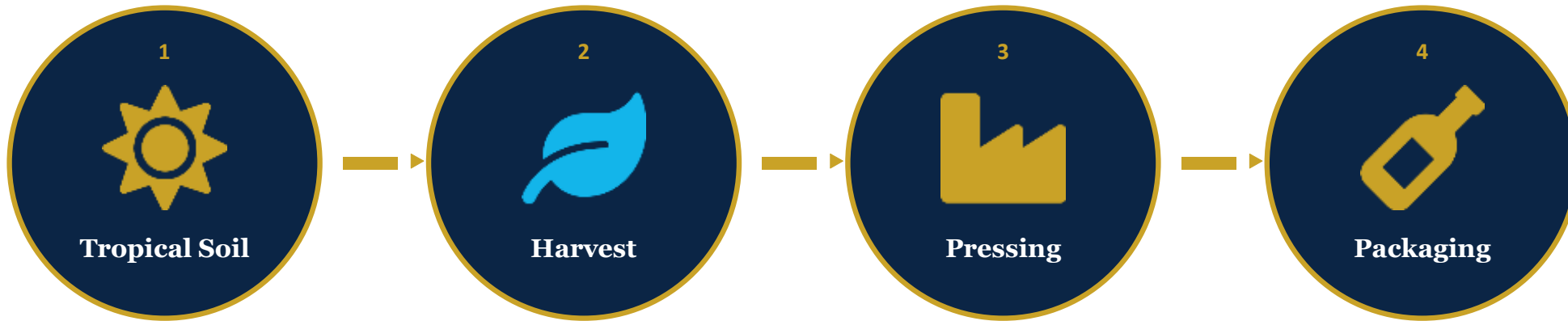
Lead  
Cadmium  
Arsenic

### Heavy-Metal Target Set

Plant oils, nuts, and seed products are consistent NOV targets.

# Why Coconut Oil Is at Risk

From tropical soil to finished jar — four stages where contamination enters.



Decades of volcanic and tropical soil accumulation in palm plantations

Coconut meat absorbs and concentrates soil metals over the tree's lifespan

Cold-press or RBD (refined/bleached/deodorized) may retain or reduce metals

Bottle, lid, and inks (BPA, phthalates, dyes) introduce additional exposures



**Imported tropical plant oils often exceed Prop 65 MADLs before any California-specific testing.**

*Lead MADL = 0.5 µg/day. A 1-tablespoon (14 g) serving at 0.05 ppm lead hits the threshold.*

# The Dual-Use Problem

*One SKU, two regulatory frames. Most brands get this wrong.*



AS FOOD / COOKING OIL

## Daily-Serving Exposure Math

- Lead MADL = 0.5 µg/day (reproductive)
- Cadmium MADL = 4.1 µg/day
- Based on label-recommended serving
- Heavy-metal warning if exceeded



AS COSMETIC / TOPICAL

## Dermal Exposure Math

- Different exposure pathway (skin absorption)
- Cocamide DEA separately listed (cancer, 2012)
- Ingredient-list label requirements apply
- Full-body usage assumptions drive math

*Same oil, two compliance frameworks. Your determination must be explicit about which.*

# 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 immediately on response.



## Settlement Exposure

Food-oil settlements typically run \$20K–\$100K+ per action — plus attorney fees.



## Retailer & Amazon Pressure

Whole Foods, Sprouts, Target, and Amazon all require documented Prop 65 compliance for listing.



## Relabel or Reformulate

Options become: add warning (loses 'clean' positioning), change supplier, or reduce serving size.

*For coconut oil brands, a Prop 65 warning undermines the 'clean, natural' brand promise.*

# 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 + InterlinkIQ

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 We Deliver

*An end-to-end Prop 65 program — dual-pathway for food and cosmetic applications.*



**SKU-Level Risk Assessment**



**Heavy Metal Testing Oversight**



**Food & Cosmetic Exposure Math**



**Compliance Determination**



**Warning Label Strategy**



**Grower & Packaging Supplier Program**



**Documentation System**



**Ongoing Monitoring**

*Every component is documented, traceable, and audit-ready — per SKU, per use case.*

# Core Technical Components

*The compliance stack underneath every coconut oil determination we issue.*



## Heavy Metal Panel Testing

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



## Food + Cosmetic Exposure Math

Parallel calculations: cooking-oil daily-serving AND topical full-body-coverage — each SKU evaluated both ways when applicable.



## Cocamide DEA Screening

For coconut-derived cosmetic ingredients, cocamide DEA (listed 2012, cancer) is separately flagged and documented.



## Packaging Chemical Review

Bottle, cap, liner, and printing ink screened for BPA/BPS, phthalates, and other listed chemicals.



## SKU-by-SKU Compliance File

Each format (jar vs bottle, virgin vs RBD, food-grade vs cosmetic-grade) gets its own determination file.

# Supply-Chain Control: Grower to Shelf

Coconut oil supply chains are long and mostly imported. Controls start at the grove.



*Imported plant oils travel 8,000 miles. Your supplier file travels with every jar.*

# The SystemsBuilder Approach

Artifact-based compliance — built once, scales across formats and use cases.



ARTIFACTS vs RECORDS

**You pay for the structure — not the records.**

*Build once. Use for every format.*

Example:

ARTIFACT (you pay)

## Heavy Metal Testing Program

One document defining how every coconut oil lot is tested, reviewed, and documented.

↓ Generates unlimited ↓

RECORDS (no added cost)

## Per-Lot, Per-Format Test Records

Every jar, bottle, virgin, RBD, and MCT format fills the same framework — no new artifact needed.

→ *Scalable, predictable, cost-efficient.*

# How It Works

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

## 01 STEP Setup

- SKU & use-case scoping
- Grower & origin mapping
- Testing plan per format
- Documentation structure

## 02 STEP Implementation

- Lab coordination (ISO 17025)
- Dual-pathway exposure math
- Per-SKU determination
- Warning-label decisions

## 03 STEP Monitoring

- Monthly compliance oversight
- Per-lot & per-origin review
- Trend analysis by grower
- Audit-ready reporting

# Setup Pricing — One-Time Investment

*Priced per SKU — each format and use case is a separate compliance file.*

COMPLIANCE SYSTEM SETUP

# \$1,500

*up to 3 finished SKUs*

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## + \$150

each additional SKU (format / size / grade)

*One-time investment to build your system.*

## SETUP INCLUDES



SKU-level risk assessment



Heavy metal testing program



Food & cosmetic exposure framework



Documentation system setup



Compliance determination structure

# Monthly Monitoring – Ongoing Oversight

*Continuous compliance. Scales with your SKU catalog.*

ONGOING COMPLIANCE OVERSIGHT

**\$500**  
per month — up to 7 SKUs

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**+ \$50 / month**  
per additional SKU

*Keeps you continuously compliant.*

## MONITORING INCLUDES



Per-lot test review



Compliance verification



Monthly reporting



Trend analysis by grower/origin

*Cancel anytime. No long-term contracts.*

# Testing Monitoring Fees

*Per-event oversight — pay only when a lot is tested.*

# \$35

## per testing monitoring event

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

### WHAT THE \$35 COVERS

- Lab report review
- Threshold comparison vs MADL
- Per-SKU 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 — per SKU.*



## Per-SKU Compliance Determinations

Each format's lot review with pass/fail determination, dual-pathway exposure math, and reviewer sign-off.



## Monthly Summary Reports

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



## Compliance Monitoring Logs

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



## Grower & Supplier Records

Attestations, COAs, risk ratings, and corrective actions by plantation origin and packaging supplier.



## Audit-Ready Documentation

Packaged for OAG inquiries, retailer audits, and Amazon compliance requests on 24-hour notice.

# Built for Defensibility

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



## Documented Due Diligence

Every SKU determination has a record, a reviewer, and a date.



## Verified Lab Testing

ISO 17025 independent results — no conflicts of interest.



## Traceable Decisions

Grower → origin → lot → SKU → determination — fully linked.



## Structured System

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

Critical for lawsuits • Retailer audits • Amazon compliance • Regulatory inquiries

# 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: brands with complex sourcing and multiple formats

## DIY (SystemsBuilder)

*at SystemsBuilder.pro*

- Self-managed execution
- \$1-per-artifact library access
- In-house QA team runs the program
- Best for: established brands with existing QA infrastructure

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

# Your Risk Profile

Every one of these factors increases your exposure — independently.

## #1 ENFORCEMENT TARGET



### Food Category

Food & supplements = largest Prop 65 enforcement category. Plant oils sit inside this bucket.

## TOP LITIGATION DRIVER



### Heavy Metals

Lead, cadmium, and arsenic in plant oils are recurring NOV targets — especially imported lots.

## DUAL-USE COMPLEXITY



### Food + Cosmetic

If sold for both cooking AND topical use, both exposure frameworks apply to the same SKU.

## RETAILER DEMANDS



### Compliance Documentation

Whole Foods, Sprouts, Amazon, and major chains now require proactive Prop 65 documentation.



***An imported plant oil is a Prop 65 enforcement target by default — even if your soil is organic.***

CALL TO ACTION

# Don't wait for a 60-Day Notice.

*Protect your coconut oil catalog — today.*



MANAGED COMPLIANCE

**Let us manage it for you.**

- End-to-end Prop 65 system setup
- Per-SKU monitoring & oversight
- Food + cosmetic dual-pathway review
- Expert-managed execution



DIY LIBRARY

**Build it yourself.**

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

*“Build it yourself — or let us manage it for you.”*

Prop65Compliance.com • [SystemsBuilder.pro](#)