

Prop 65 Compliance

for Olive Oil, Virgin & Blended

System-Based Compliance. Not Just Testing.

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



2 µg/kg

Benzo(a)pyrene

EU max in oils & fats

23 of 24

samples

French study — MOSH/MOAH
detected

Why This Matters

Olive oil is a premium product with real Prop 65 exposure — and the risk profile differs across virgin, refined, and blended grades.

WARNING

Consuming this product can expose you to lead, polycyclic aromatic hydrocarbons, and other chemicals known to the State of California to cause cancer, birth defects, or other reproductive harm.

— Prop 65 safe-harbor warning language, food category

P r e m i u m ≠ e x e m p t

"100% extra virgin" is a quality claim, not a Prop 65 defense. Lead, PAHs, MOAH, and phthalates can enter the bottle at any point from grove to fill — and a warning is required if exposure exceeds the safe-harbor level.

Three Grades, Three Risk Profiles

Virgin/EVOO carries PAH and MOAH risk from grove and milling. Refined adds 3-MCPD and glycidyl esters. Blended (incl. pomace) carries the highest PAH risk.

Lead in Foods Drives Enforcement

Lead is the #1 chemical in Prop 65 food NOVs (~40-46%). Naturally occurring is no defense — every µg above the 0.5 µg/day MADL counts.

Packaging & Bottling Are In-Scope

Phthalates from gaskets, hoses, and PVC liners can leach into oil. A 2024 French study found MOSH/MOAH in 23 of 24 olive-oil samples — much from packaging.

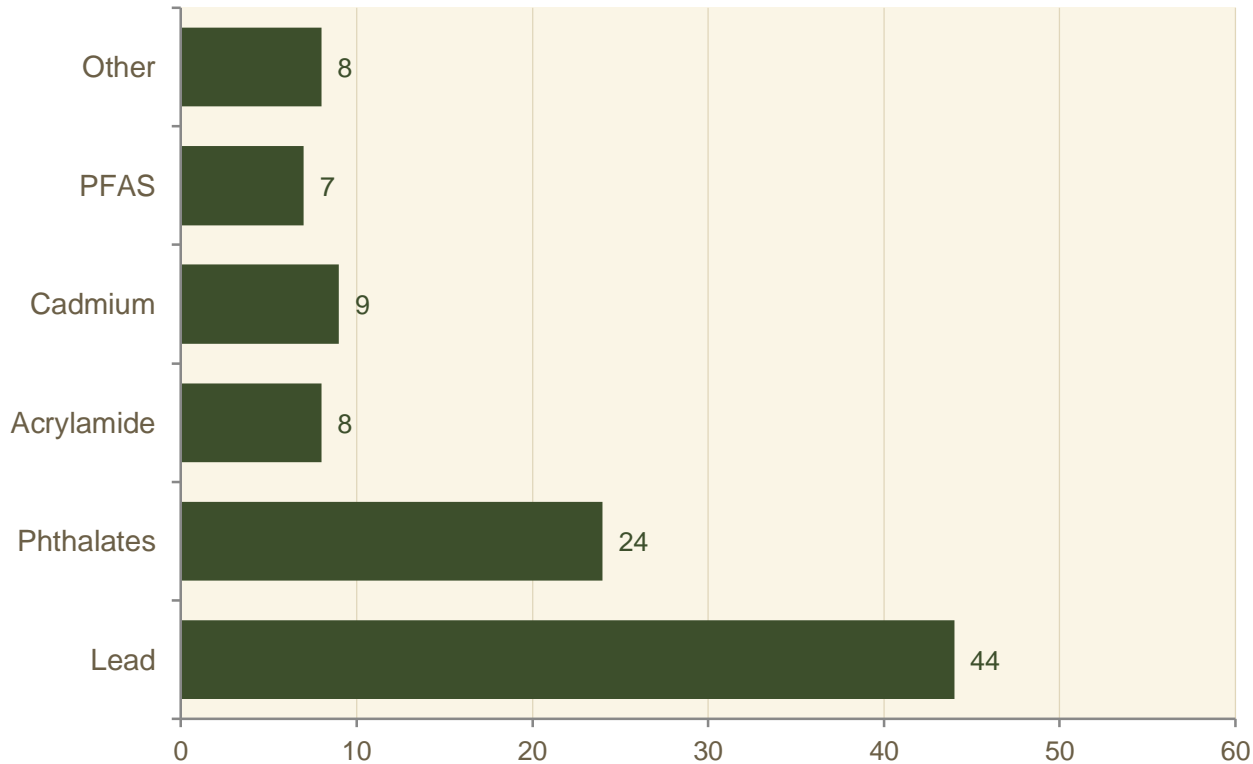
Documentation Is Your Defense

Without a documented program, most importers and bottlers settle. A defensible record is what closes a 60-Day Notice cheaply.

Where Olive Oil Sits in Prop 65 Enforcement

Heavy metals dominate food NOVs — and PAHs in oils are tightening worldwide.

Prop 65 NOV Chemical Mix — Food Category (%)



Source: Intertek monthly Prop 65 60-Day Notice analyses 2022–2025; Juris Law Group monthly enforcement reviews. Lead and phthalates consistently lead the food category.

EU

2023/915

PAH limits in oils

Global Tightening on PAHs

EU caps benzo(a)pyrene at 2 µg/kg and PAH4 at 10 µg/kg in oils & fats. Imported olive oil entering California is increasingly tested at retail.

96%

MOSH / MOAH detected

Mineral Oil Hydrocarbons

A 2024 French National Consumer Institute study found MOSH/MOAH in 23 of 24 olive-oil samples — emerging contaminant tied to packaging and lubricants.

Olive Oil = Imported & Premium

Spain · Italy · Greece · Tunisia · Morocco · Turkey · California

Premium-priced imports invite plaintiff scrutiny, and California's domestic producers compete against the same testing demands. Heritage labels do not exempt operators from the warning rule.

Why Olive Oil Is at Risk

Every step from grove to bottle adds a contamination pathway — and grade defines which chemicals dominate.

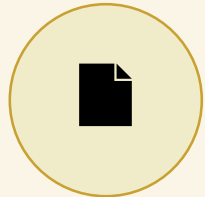


Olive oil is contaminated upstream — but bottled, shipped, and sold in California. Liability follows the label.

⚠ Prop 65 lead MADL: 0.5 µg/day. EU benzo(a)pyrene cap: 2 µg/kg. EU PAH4 cap: 10 µg/kg. No California-specific safe-harbor exists for PAHs in oil — exposure analysis governs.

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. Olive oil sits in a heavily-noticed food category.



Settlement Exposure

Typical food settlements run \$20K–\$100K+ per action. Premium-priced products often face larger demands tied to higher per-unit margins.



Reputational Damage

Olive oil is a trust product — consumers pay a premium for quality and origin. A "cancer warning" headline undermines the entire brand position.



Retailer Delisting

Whole Foods, Costco, Trader Joe's, and Sprouts all require Prop 65 compliance attestations. A single notice can cost a placement.

Most operators settle — not because their oil is unsafe, but because their documentation is.

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

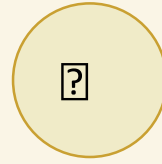
An end-to-end Prop 65 compliance program for olive-oil importers, bottlers, and brands — not a one-time report.



Grade-Specific Risk Assessment



Grove & Origin Verification



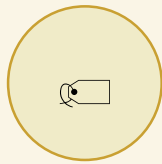
PAH, MOAH & Heavy Metals Testing



Packaging & Phthalate Migration Review



Exposure & MADL Evaluation



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 olive-oil products.



PAH & Heavy Metals Testing

Finished-oil testing for benzo(a)pyrene, PAH4, lead, cadmium & arsenic at ISO 17025 labs — benchmarked against the 0.5 µg/day lead MADL and EU PAH ceilings as a quality reference.



MOSH / MOAH Screening

Mineral-oil hydrocarbon screening — the contamination route confirmed in the 2024 French study tied to packaging, lubricants, and printed cartons.



Phthalate & Glycidyl Ester Testing

DEHP/DBP migration testing for gaskets, closures, and PVC contact materials. 3-MCPD and glycidyl-ester testing for refined and blended grades.



Supplier COA & Origin Verification

Grove, mill, and refiner COAs cross-checked against country-of-origin risk profiles for Spain, Italy, Greece, Tunisia, Morocco, and Turkey.



Exposure vs MADL/NSRL Evaluation

Serving-size and daily-consumption calculations against the 0.5 µg/day lead MADL and applicable PAH risk levels — by SKU and grade.

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)

Olive Oil Contaminant Control Program

One document that defines how PAH, MOAH, heavy-metal and phthalate testing is scoped, conducted, reviewed, and documented across every olive-oil SKU and grade.

↓ *Generates unlimited* ↓

RECORDS (no added cost)

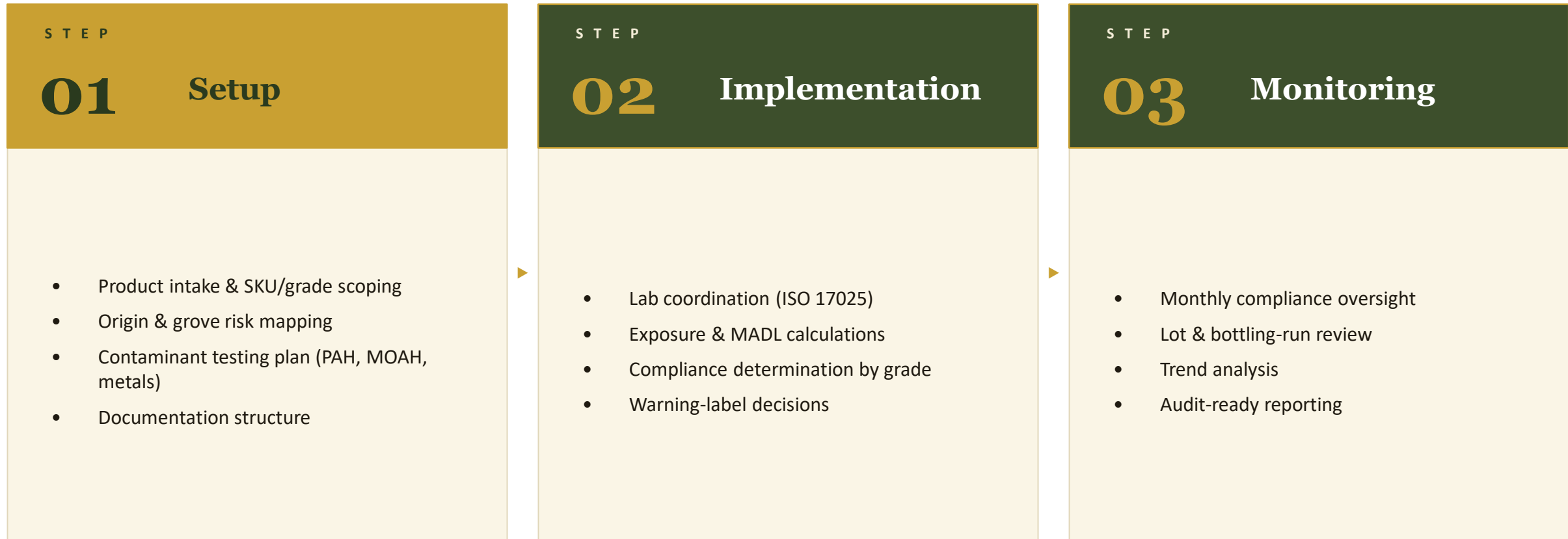
Unlimited Lot Test Results

Every imported drum, every blend lot, every bottling run fills out the same framework — no new artifact needed.

→ *Scalable, predictable, cost-efficient.*

How It Works

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



P R I C I N G

Setup Pricing — One-Time Investment

Build your defensible Prop 65 compliance system for olive-oil 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 & grade (EVOO/Virgin/Blended)
- ✓ PAH, MOAH & metals testing program design
- ✓ Packaging & migration-risk evaluation
- ✓ Documentation system setup
- ✓ Compliance determination structure

P R I C I N G

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.

M O N I T O R I N G I N C L U D E S

- ✓ Lot / bottling-run 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.



Lot Compliance Review Reports

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



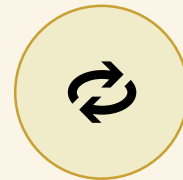
Monthly Summary Reports

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 & Grove Tracking Records

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



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.



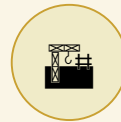
Verified Lab Testing

ISO 17025 independent results — no conflicts of interest.



Traceable Decisions

Grove → mill → blend → bottle → 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: importers & bottlers without in-house QA*

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 by Grade

Each olive-oil grade carries a distinct contaminant signature — a one-size compliance program is not enough.

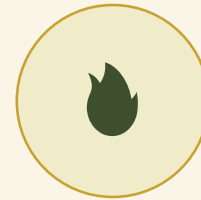
GRADE 1 — PREMIUM



Extra Virgin & Virgin

Mechanical extraction only. Primary risks: PAHs from groves and pruning, MOAH from milling lubricants, lead from soil and irrigation, phthalates from packaging.

GRADE 2 — REFINED



Refined Olive Oil

High-temperature deodorization adds 3-MCPD and glycidyl-ester risk on top of the virgin-grade contaminants. Refining can mask but not eliminate upstream metals.

GRADE 3 — BLENDED



Olive Oil & Pomace

Blends of refined + virgin, or solvent-extracted pomace oil. Highest PAH risk in the category — pomace specifically has been documented exceeding EU limits.

STRICT ENVIRONMENT



California

Most aggressive private-enforcement regime in the U.S. Premium-priced olive oil is a high-value target — a single notice can hit retail placements at multiple chains.

⚠ Premium positioning amplifies, not reduces, your Prop 65 exposure — even if your oil is genuinely first-rate.

C A L L T O A C T I O N

Don't wait for a 60-Day Notice.

Start your Prop 65 olive-oil 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



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