

CALIFORNIA PROPOSITION 65

Prop 65 Compliance

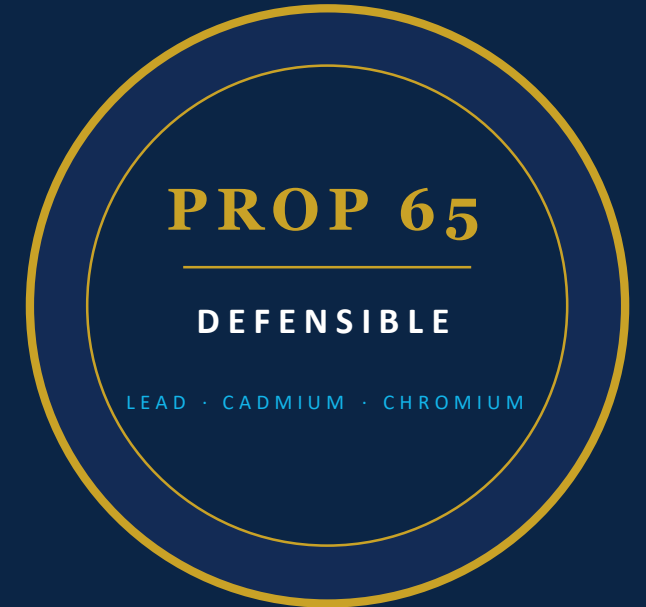
for Tahini / Sesame Paste

System-Based Compliance. Not Just Testing.

Presented by: Prop65Compliance.com

Compliance Management by Consultare Inc. Group

Powered by SystemsBuilder.pro



0.5
µg/day
Lead MADL Threshold

38%
of NOVs
Food & Supplements
Category

Why This Matters

California Prop 65 applies to every ingredient — and sesame seeds naturally absorb lead, cadmium, and chromium directly from the soil.

WARNING

Consuming this product can expose you to chemicals including lead, cadmium, and chromium, which are known to the State of California to cause cancer, birth defects, or other reproductive harm.

— P65Warnings.ca.gov/food

“Natural” ≠ Exempt

Enforcement Is Aggressive

California requires warnings for exposure to listed chemicals — enforcement is driven by private plaintiff attorneys (‘bounty hunters’).

Penalties Are Real

Non-compliance leads to financial penalties, legal costs, relabeling, and product removal from shelves.

Soil Uptake Is Unavoidable

Sesame plants absorb lead, cadmium, and chromium through their roots. Every paste inherits its soil history — and ‘naturally occurring’ is hard to prove.

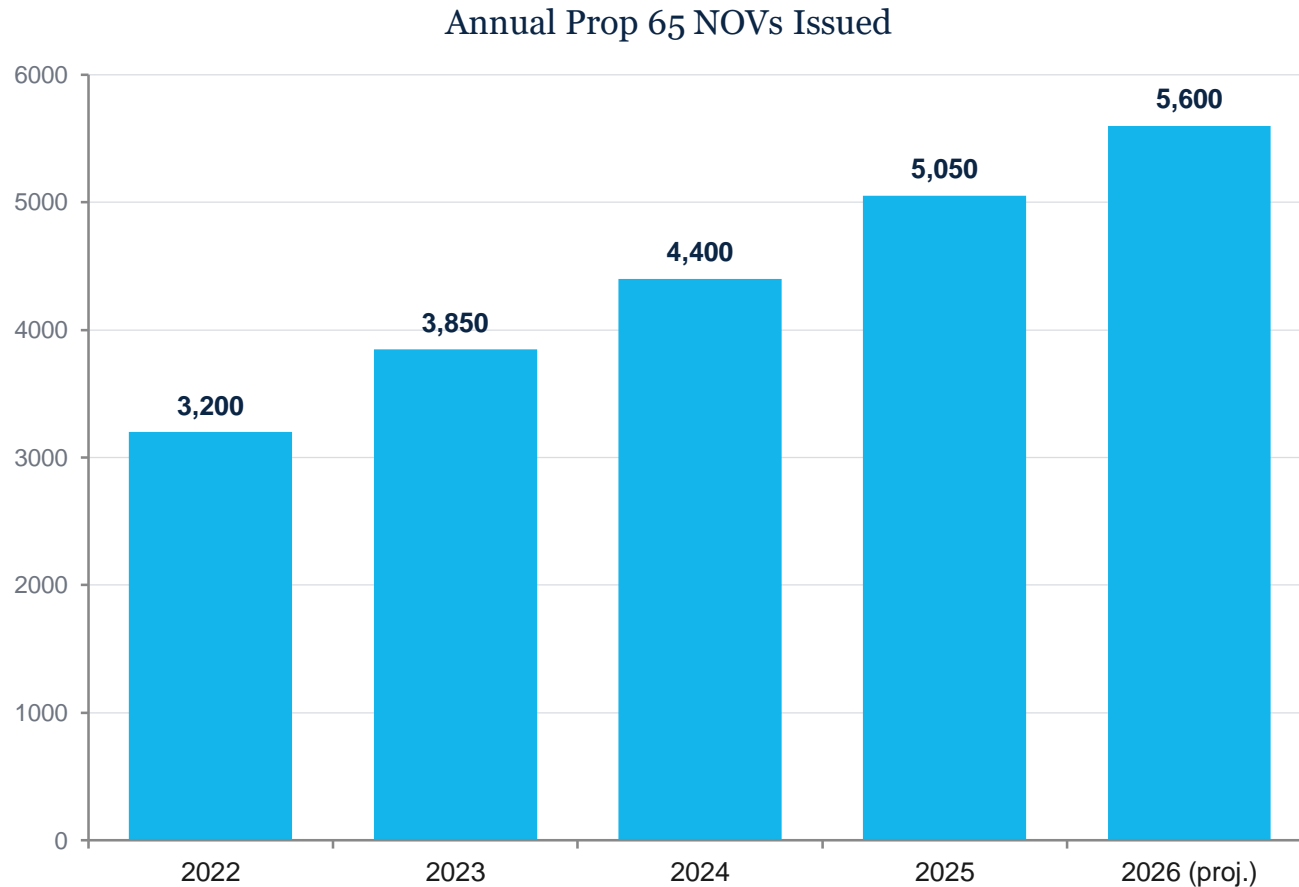
Documentation Is Your Defense

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

W H Y

Prop 65 Enforcement Trends (2024–2026)

Enforcement is increasing, not slowing down.



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

~38%

Food & Supplements

Largest single category of Prop 65 enforcement in 2025 — pastes and sauces are a rising target.

~\$86M

2026 Settlements

Record enforcement activity — majority paid to plaintiff attorneys.

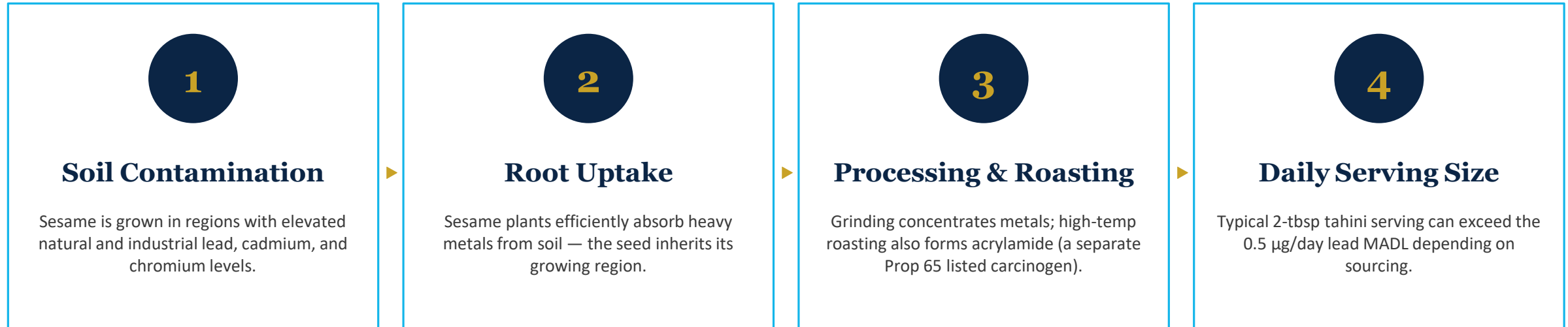
Pastes Are On the Radar

Ginger · Curry · Tomato · Date · Tahini

Plaintiffs have sent 60-Day Notices for heavy metals in ginger, curry, tomato, and date paste — tahini sits in the same category. Typical warnings name lead, cadmium, and chromium.

Why Tahini Is at Risk

Every step in the sesame supply chain concentrates risk — and a single serving can put you over the 0.5 µg/day lead MADL.

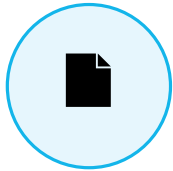


Tahini inherits Prop 65 risk at every step — soil, seed, processing, and serving size all compound.

⚠ Lead, Cadmium, and Chromium are all listed Prop 65 chemicals — the standard tahini warning names all three. The lead MADL is just 0.5 µg/day.

Business Impact of Non-Compliance

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



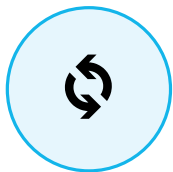
60-Day Notice of Violation

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



Settlement Exposure

Typical food settlements \$20K–\$100K+ per action — plus attorney fees and corrective actions.



Relabeling & Reformulation

Product pulled, warning labels added, and sourcing reviewed — potential supplier requalification.



Retail & Distributor Pressure

Grocery buyers demand evidence of compliance before reinstatement, renewal, or PO release.

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.



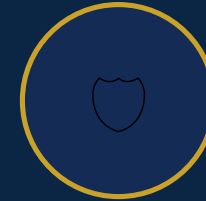
Managed by Consultare Inc. Group

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.*

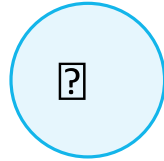
WHAT

What We Deliver

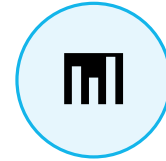
An end-to-end Prop 65 compliance program for tahini and sesame-paste manufacturers — not a one-time report.



**Product Risk
Assessment**



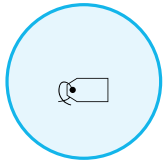
**Heavy Metals
Testing Oversight**



**Exposure
Evaluation**



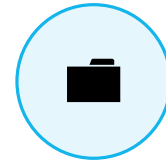
**Compliance
Determination**



**Warning Label
Strategy**



**Supplier
Compliance Program**



**Documentation
System**



**Ongoing
Monitoring**

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

Core Technical Components

The compliance stack underneath every determination we issue for tahini and sesame-paste products.



Heavy Metals Testing

Oversight of lead, cadmium, chromium, and arsenic screening on finished product and incoming sesame at ISO 17025 labs.



Exposure vs MADL / NSRL Evaluation

Serving-size and daily-exposure calculations against the 0.5 µg/day lead MADL to determine whether a warning is required.



Supplier COA & Origin Verification

Incoming sesame-seed Certificates of Analysis cross-checked against origin-based risk thresholds.



Batch / Lot Compliance Review

Every production 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.

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)

Heavy Metals Testing Program

One document that defines how all lead, cadmium, and chromium testing is scoped, conducted, reviewed, and documented.

↓ Generates unlimited ↓

RECORDS (no added cost)

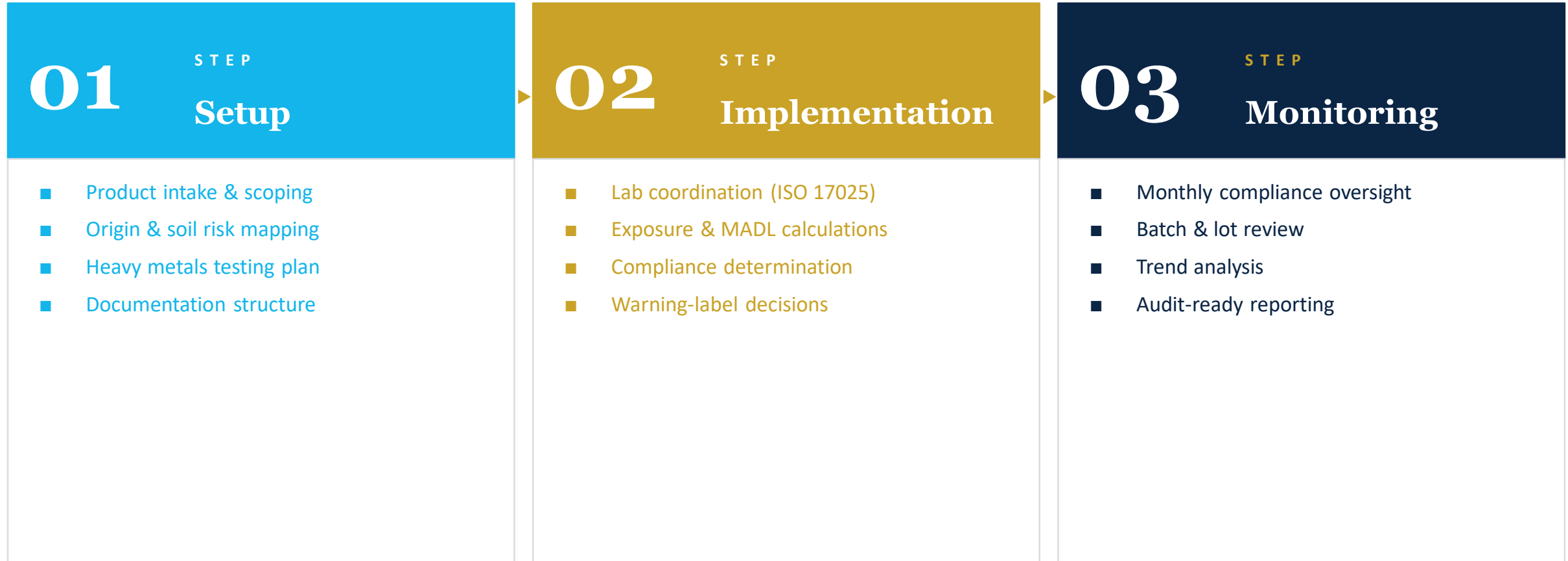
Unlimited Batch Test Results

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

→ Scalable, predictable, cost-efficient.

How It Works

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



Setup Pricing — One-Time Investment

Build your defensible Prop 65 compliance system for tahini and sesame-paste products.

COMPLIANCE SYSTEM SETUP

\$1,500

up to 3 finished products

+ \$150

each additional finished product

One-time investment to build your system.

SETUP INCLUDES

- ✓ Risk assessment by product and SKU
- ✓ Heavy metals testing program design
- ✓ Exposure evaluation framework
- ✓ Documentation system setup
- ✓ Compliance determination structure

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.



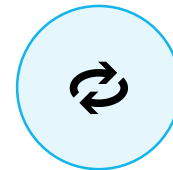
Monthly Summary Reports

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 supplier.



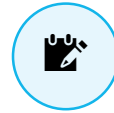
Audit-Ready Documentation

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

HOW

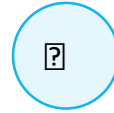
Built for Defensibility

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.



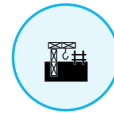
Verified Lab Testing

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

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*

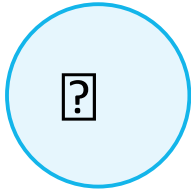
- Self-managed execution
- \$1-per-artifact library access
- Internal team runs the program
- Best for: teams with existing compliance capability

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

Your Risk Profile

Every one of these factors increases your exposure — independently.

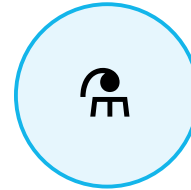
#1 ENFORCEMENT TARGET



Food Category

Food & supplements = largest Prop 65 enforcement category. Pastes (ginger, curry, tomato, date) have drawn dozens of 60-Day Notices — tahini sits in the same bucket.

TOP LITIGATION DRIVER



Heavy Metals

Lead, cadmium, and chromium — any detectable level above the 0.5 µg/day lead MADL can trigger a 60-Day Notice.

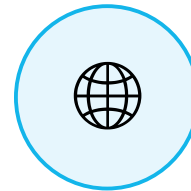
INHERENT AGRICULTURAL RISK



Sesame Itself

Sesame plants are efficient accumulators of soil-borne metals. Origin, soil chemistry, and growing practices all carry forward into the paste.

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 for tahini and sesame paste 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