

CALIFORNIA PROPOSITION 65

Prop 65 Compliance for Vegetable Purees

System-Based Compliance. Not Just Testing.

Presented by: Prop65Compliance.com

Compliance Management by Consultare Inc. Group

Powered by SystemsBuilder.pro



AB 899

Effective Jan 2024

87%

Excess Lead*

Why This Matters

Vegetable purees carry the worst heavy-metals profile of any baby food category — and AB 899 makes every result public.



⚠️ WARNING

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

— P65Warnings.ca.gov

Root Veg Risk



Enforcement Is Aggressive

AB 899 (effective Jan 1, 2024) requires monthly testing of every production aggregate; FDA finalized lead action levels for processed baby food in Jan 2025.



Penalties Are Real

AB 899 violations are misdemeanors and trigger UCL claims; active class-action MDLs already exposing 8-figure liability across the category.



Cited by Name

HBBF testing found 33 of 38 vegetable purees with excess lead and 29 of 38 with excess cadmium — sweet potato and carrot purees the worst offenders.



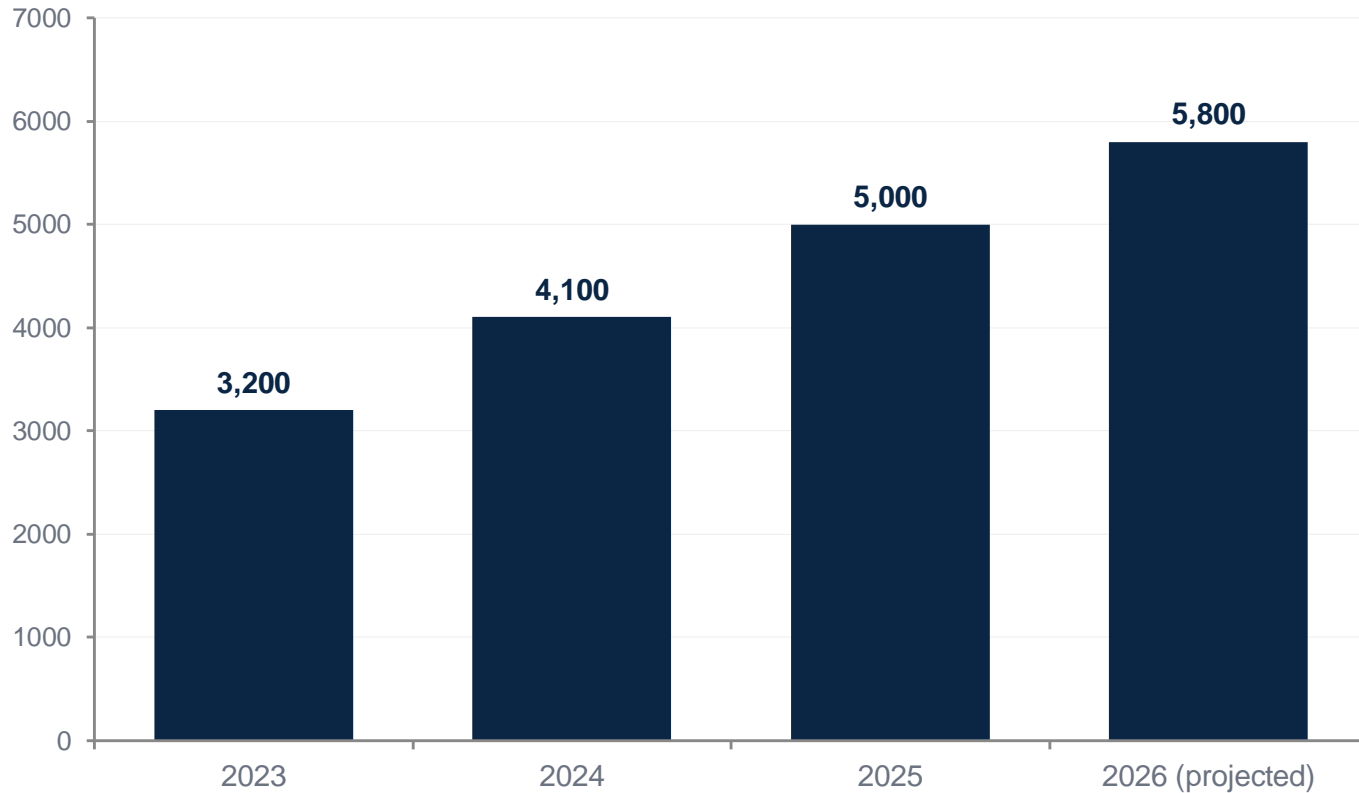
Documentation Is Your Defense

Without a compliance system, vegetable puree manufacturers can't meet AB 899 disclosure — let alone defend against MDL discovery.

The Vegetable Puree Profile

Category-specific metals data — not theoretical risk.

Annual Prop 65 NOVs Issued



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

87 ppb

Cadmium in Carrots

75% of Gerber carrot products tested above 5 ppb cadmium; some samples reached 87 ppb — disclosed via House Subcommittee investigation.

48 ppb

Lead in Sweet Potato

Conventional sweet potato purees from major brands tested at 48 ppb lead — more than 2x the FDA's 20 ppb action level for root vegetables.

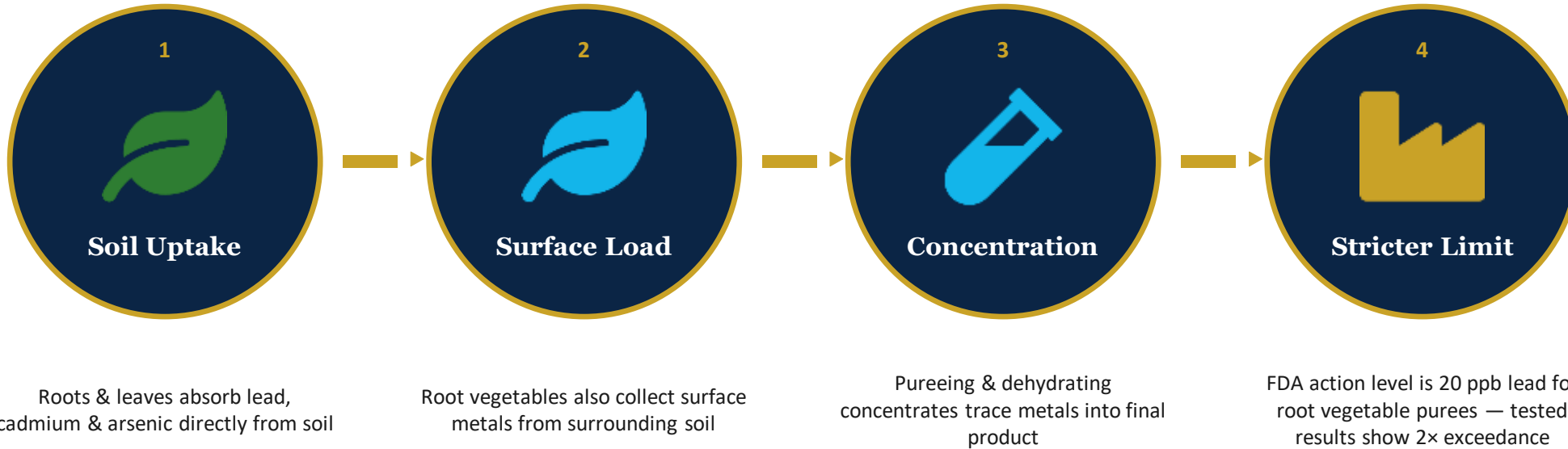
Worst Category

Sweet Potato, Carrot, Spinach

Root vegetables and leafy greens absorb As, Cd & Pb directly through soil uptake — and pureeing concentrates every trace.

Why Vegetable Purees Are at Risk

Vegetable purees are the most heavily contaminated baby food category — driven by crop chemistry, not contamination events.



AB 899 has no ‘naturally occurring’ exemption — every lot must be tested.

FDA action levels (Jan 2025): 20 ppb lead for single-ingredient root vegetable purees & dry cereals; 10 ppb for fruits, other vegetables, yogurts & meats. AB 899 publishes every result.

Business Impact of Non-Compliance

AB 899 + Prop 65 + class action — three balance-sheet hits before a verdict.



AG Enforcement Letter

AG Bonta issued enforcement advisory letters in March 2026; UCL violations follow disclosure failures immediately.



Class Action Exposure

Active MDL litigation against major puree brands — 8-figure exposure plus injunctive relief and reformulation orders.



Reformulation Pressure

Reformulation often means diluting with water or shifting away from sweet potato & carrot — direct hit to product line.



Retail Delisting

Major retailers now require AB 899 disclosure compliance before stocking — non-compliance equals delisting.

Most settlements happen not because brands are unsafe — but because their documentation can't prove they aren't.

Why Prop65Compliance.com

Compliance-focused. Built for AB 899's monthly testing cadence — not one-time reports.



Compliance-Focused

We don't litigate — we build the AB 899 + Prop 65 system that prevents litigation.



System-Based Approach

AB 899 mandates monthly testing AND public disclosure. Both must be defensible.



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 We Deliver

An end-to-end AB 899 + Prop 65 compliance program — not a one-time report.



**Product Risk
Assessment**



**Chemical 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.



Heavy Metal Testing

ICP-MS quantification of Arsenic, Cadmium, Lead and Mercury — every production aggregate, every month, by ISO/IEC accredited labs as required by AB 899.



FDA Action Level Comparison

Each result compared to FDA Closer to Zero action levels — 20 ppb lead for root vegetable purees, 10 ppb for other vegetables — AND Prop 65 MADLs per lot.



Supplier COA Verification

Origin & soil attestation per ingredient (sweet potato, carrot, leafy greens highest priority), composite sampling per AB 899 protocols, supplier COAs aligned to FDA action levels.



Batch-Level Compliance Review

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

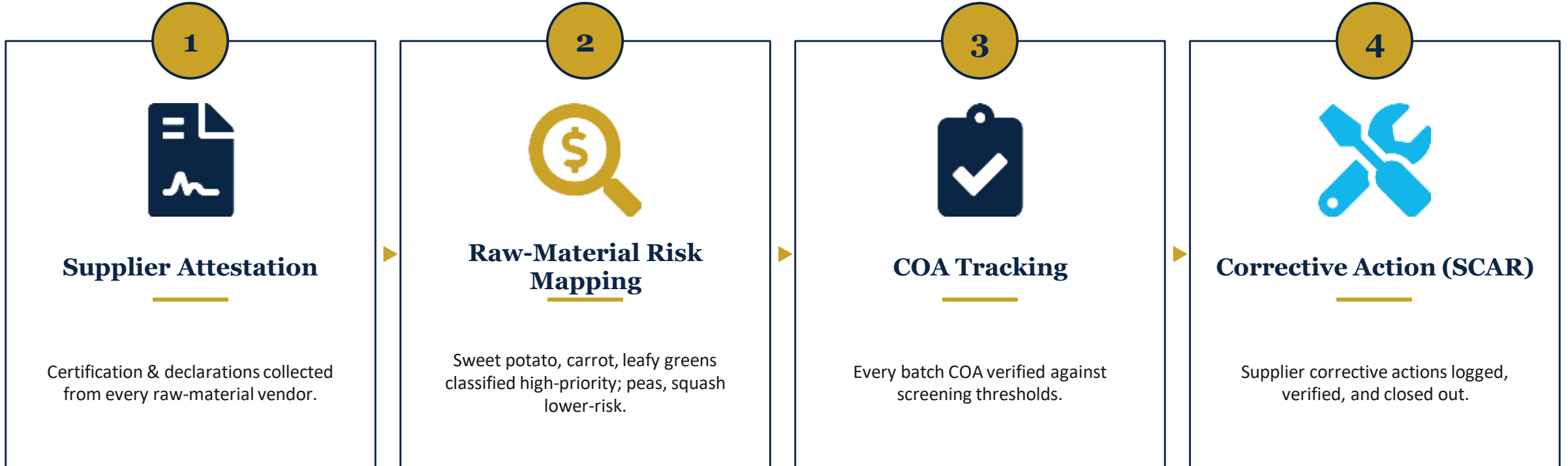


Disclosure & Labeling

AB 899 website disclosure feed, QR-code labeling, and Prop 65 warning logic — all generated from the same compliance record.

Supply-Chain Compliance Control

Prevent the issue at the soil — before it reaches your puree.



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)

Testing Program

One document that defines how all 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 It Works

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

01 STEP Setup

- Product intake & scoping
- Risk identification by category
- Testing plan creation
- Documentation structure

02 STEP Implementation

- Lab coordination (ISO/IEC 17025)
- Action level & MADL evaluation
- Disclosure record build
- QR code & label deployment

03 STEP Monitoring

- Monthly compliance oversight
- Batch & lot review
- Trend analysis
- Audit-ready reporting

Setup Pricing – One-Time Investment

Build your defensible Prop 65 compliance system.

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



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
- 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 AG inquiries, retailer audits, AB 899 disclosure feed, and legal counsel 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 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



AB 899 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.

MANDATORY TESTING



AB 899 Compliance

Monthly testing of every production aggregate is mandatory under AB 899 — and disclosure went live January 1, 2025.

WORST CATEGORY



Lead & Cadmium

33 of 38 vegetable purees tested with excess lead (HBBF); sweet potato purees at 48 ppb lead — 2x the FDA action level.

MULTI-VECTOR RISK



Vegetable Purees

AB 899 + Prop 65 + FDA Closer to Zero + class action MDL — four enforcement vectors stacked on the worst-performing baby food category.

STRICT ENVIRONMENT



California

Most aggressive consumer-protection regime in the U.S. — AG enforcement letters issued March 2026.



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

CALL TO ACTION

Don't wait for the AG letter.

Start your AB 899 + Prop 65 compliance system today.



MANAGED COMPLIANCE

Let us manage it for you.

- End-to-end AB 899 + 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](#)