

CALIFORNIA PROPOSITION 65

Prop 65 Compliance for Plant-Based Meat Alternatives

Health Halo Meets Hard Math.

Presented by: [Prop65Compliance.com](https://prop65compliance.com)

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

Powered by [SystemsBuilder.pro](#)



9x

vs whey lead

80%

plant-based fail

Plant-Based Is the Highest-Risk Protein Category

The entire value proposition is 'cleaner than meat' — and the analytical chemistry tells a different story.



THE DATA

Consumer Reports 2025: plant-based proteins contain 9× more lead than whey and 2× more than beef-based.

— Clean Label Project: 80% of plant-based protein exceeded Prop 65 limits

Plant Is the Outlier



Soil-Based Uptake — Not Process Contamination

Pea, soy, wheat proteins absorb lead, cadmium, arsenic from soil through root systems. No processing step can remove what the plant accumulated.



Formulation Stack Amplifies Risk

Plant-based patties blend 15–25 ingredients: multiple proteins, oils, binders, colorants, flavors. Each contributes to the per-serving heavy-metal total.



Health-Halo Makes Warnings Brand-Lethal

Consumers pay a premium specifically to avoid perceived contamination. A Prop 65 warning directly contradicts the purchase rationale.



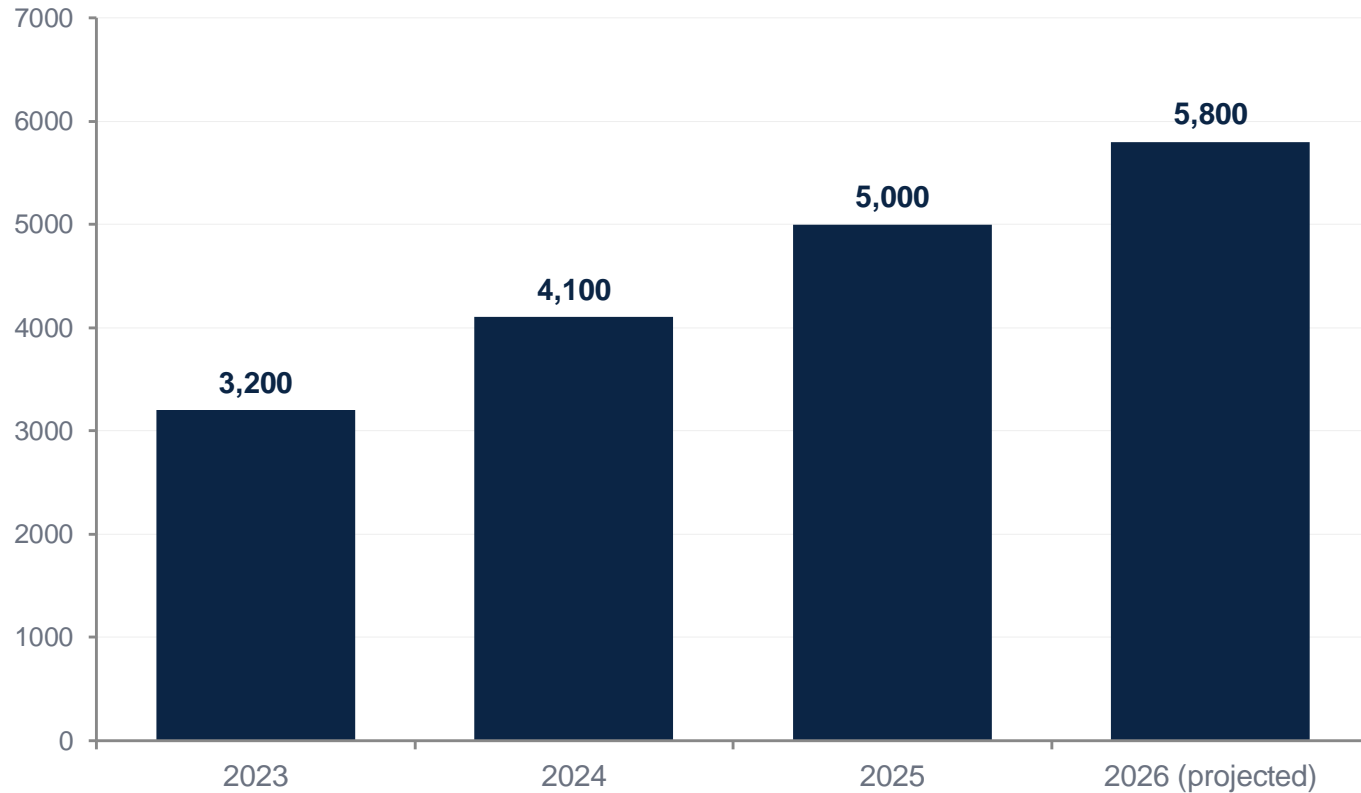
Cooking Creates Additional Prop 65 Compounds

High-heat cooking of plant proteins generates acrylamide (Prop 65-listed for cancer) — a separate compliance question for ready-to-eat products.

Plant-Based Is a Named Enforcement Target

NOVs targeting plant-based protein, greens powders, and similar ingredients are a 2025 enforcement trend.

Annual Prop 65 NOVs Issued (All Categories)



Source: OAG 60-Day Notice database. Nov 2025 filings specifically named plant-based protein, greens powders, and legume-based products.

0.5 µg

Lead MADL

Per-day daily-dose threshold. A single plant-based patty at low ppm lead can hit it in one serving.

9x

CR Plant vs Whey

Consumer Reports 2025: plant-based protein averaged nine times the lead of whey-based protein.

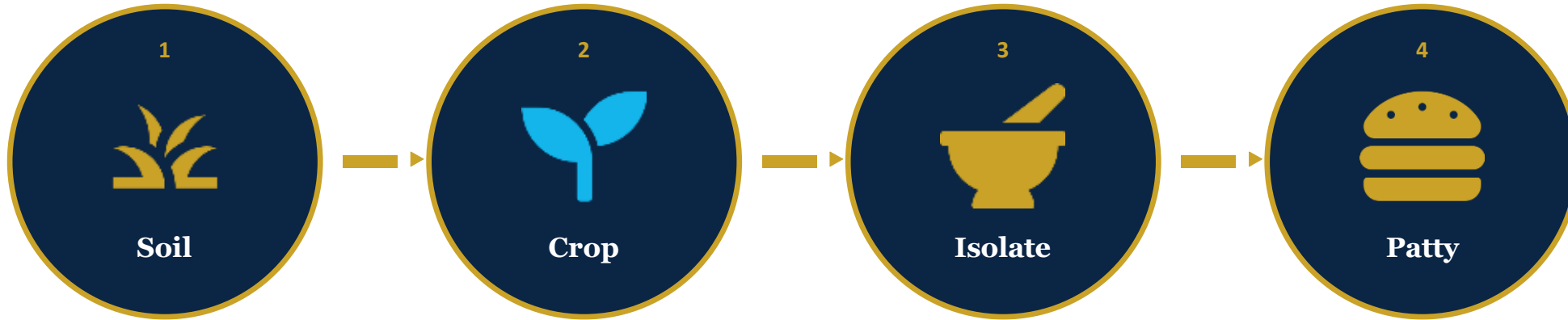
Pb
Cd
As

Food Target Set

Lead, cadmium, and arsenic drive food-category enforcement. All three accumulate in plant proteins.

How Heavy Metals Reach the Patty

The contamination starts in the soil — every step after just concentrates and combines it.



Lead, cadmium, arsenic naturally occur in arable soil — and industrial legacy contamination raises baseline levels in many growing regions

Peas, soy, wheat, rice absorb heavy metals through root systems. Some crops (legumes especially) concentrate lead over growth cycles

Protein isolation removes fiber, starch, water — but concentrates minerals. Isolates can be 5–10× higher ppm than raw crop

15–25 ingredients combine into one patty. Lead contributions from each input stack additively in the per-serving total



Contamination is upstream of your factory — defensibility requires documenting every step back to the field.

Farm → protein supplier → your formulation: each link needs supplier attestation and batch-level COA documentation.

The Health-Halo Trap

Plant-based customers buy for the reason Prop 65 warnings damage most — and the analytics don't support the marketing.



WHAT THE LABEL PROMISES

"Clean. Plant. Better."

- Clean label, plant-based, organic
- Premium price on 'cleaner' positioning
- Consumer avoids perceived meat contamination
- Implied: fewer toxins than the animal version



WHAT THE LAB REPORTS SHOW

Higher lead than whey OR beef

- 9× more lead than whey-based protein (CR 2025)
- 2× more lead than beef-based protein (CR 2025)
- 80% of plant proteins exceeded Prop 65 lead
- Organic plant-based: 3× higher lead than conventional

When the warning conflicts with the purchase reason, the brand damage runs deeper than the penalty.

Business Impact of Non-Compliance

Plant-based is a retailer-sensitive, VC-backed, publicly-scrutinized category — compliance gaps hurt on every front.



60-Day Notice of Violation

Food categories with plant-protein inputs are a sustained enforcement target. November 2025 NOVs named multiple plant-protein products.



Six-Figure Settlement Range

Food-category Prop 65 settlements routinely \$50K–\$500K per SKU with reformulation or warning obligations. Multi-SKU brands face stacking exposure.



Whole Foods, Sprouts, Erewhon Pressure

Premium natural retailers deselect SKUs with Prop 65 warnings. Their customers are precisely the consumers most sensitive to the warning.



'Clean Label' Brand Damage

'Clean', 'plant-based', 'non-GMO', 'organic' claims are directly undermined by a defensive Prop 65 warning on the package.

Plant-based reformulations happen constantly — every formula change triggers a new compliance determination.

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

One-off lot testing doesn't protect you. A per-ingredient, per-SKU 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

**Every ingredient
sourced. Every patty
documented.**

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

What We Deliver

An end-to-end Prop 65 program — tuned for multi-ingredient, plant-protein-based formulations.



**Ingredient-Level
Risk Assessment**



**Heavy Metal &
Acrylamide Testing**



**Per-Serving
Exposure Math**



**Compliance
Determination**



**Warning Label
Strategy**



**Protein Supplier
Program**



**Documentation
System**



**Ongoing
Monitoring**

Every component is documented, traceable, and audit-ready — per SKU, per batch, per protein source.

Core Technical Components

The compliance stack underneath every plant-based SKU determination.



Heavy Metal Panel Testing

Oversight of Lead (MADL 0.5 µg/day), Cadmium (MADL 4.1 µg/day), Arsenic, Mercury at ISO 17025 labs — per inbound protein lot AND per finished patty.



Plant-Protein Source Screening

Pea, soy, wheat, rice, mung bean proteins screened per-lot. Soy may also require hexane-extraction residue testing (benzene risk).



Acrylamide Screening & Regulatory Status

Acrylamide forms when plant proteins are cooked at high heat. Note: CalChamber v. Bonta May 2025 permanently enjoined acrylamide Prop 65 warnings — monitor for reinstatement.



Multi-Ingredient Stack Math

Per-serving lead total calculated across all 15–25 ingredients at inclusion rate — not just the primary protein. The math is additive.

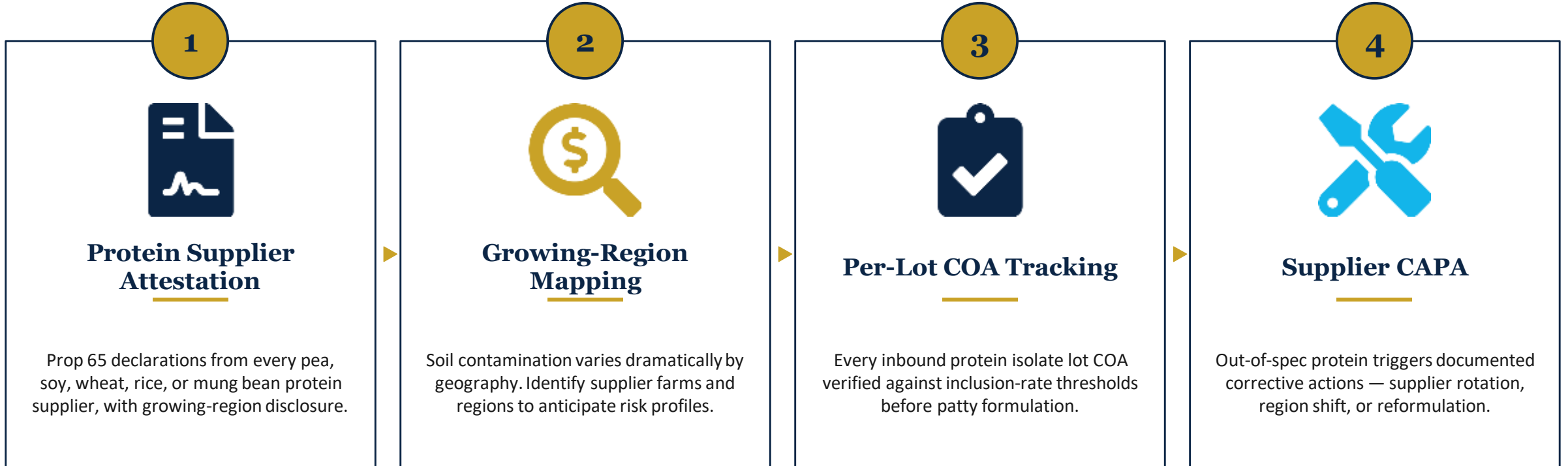


Per-SKU Compliance File

Each formula, each flavor, each reformulation: protein inputs, finished-product COA, exposure math, determination, warning decision.

Protein Supplier to Final Patty Supply-Chain Control

Every protein supplier, every growing region, every isolation process is a control point.



One contaminated protein supplier can take out every SKU in your catalog simultaneously.

The SystemsBuilder Approach

Artifact-based compliance — built once, scales across every SKU, flavor, and reformulation.



ARTIFACTS vs RECORDS

You pay for the structure — not the records.

Build once. Use for every patty.

Example:

ARTIFACT (you pay)

Formulation Screening Program

One document defining how every protein ingredient, every patty formulation, and every batch is tested, reviewed, documented.

↓ Generates unlimited ↓

RECORDS (no added cost)

Per-Flavor, Per-Batch Records

Every SKU, every flavor, every reformulation 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 & formulation scoping
- Protein supplier mapping
- Testing plan per SKU
- Documentation structure

02 STEP Implementation

- Lab coordination (ISO 17025)
- Heavy metal + acrylamide testing
- Per-serving determination
- Warning-label decisions

03 STEP Monitoring

- Monthly compliance oversight
- Per-batch review
- Reformulation re-determinations
- Audit-ready reporting

Setup Pricing – One-Time Investment

Priced per SKU — each patty, sausage, nugget, or deli-slice formulation is a separate compliance file.

COMPLIANCE SYSTEM SETUP

\$1,500

up to 3 plant-based SKUs

+ \$150

each additional SKU (flavor / format / formulation)

One-time investment to build your system.

SETUP INCLUDES



Ingredient-level risk assessment



Heavy metal + acrylamide testing program



Per-serving exposure framework



Documentation system setup



Compliance determination structure

Monthly Monitoring – Ongoing Oversight

Continuous compliance. Scales with your SKU catalog and reformulation cadence.

ONGOING COMPLIANCE OVERSIGHT

\$500
per month — up to 7 SKUs

+ \$50 / month
per additional SKU

Keeps you continuously compliant.

MONITORING INCLUDES



Per-batch test review



Reformulation re-determinations



Monthly reporting



Trend analysis by supplier

Cancel anytime. No long-term contracts.

Testing Monitoring Fees

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

\$35

per testing monitoring event

Per SKU / per batch — 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 formulation's batch review with pass/fail determination, per-serving exposure math, and reviewer sign-off.



Monthly Summary Reports

Rolling snapshot of all SKUs, testing events, supplier trends, and open action items.



Compliance Monitoring Logs

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



Protein Supplier & Farm Records

Attestations, COAs, risk ratings, and corrective actions by protein supplier and growing region.



Audit-Ready Documentation

Packaged for OAG inquiries, retailer audits, and Amazon/Whole Foods 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 formulation determination has a record, a reviewer, and a date.



Verified Lab Testing

ISO 17025 heavy-metal and contaminant results — no conflicts of interest.



Traceable Decisions

Farm → supplier → protein → patty → batch → SKU — fully linked per-serving math.



Structured System

Not ad-hoc — a real management system plaintiff attorneys recognize.

Critical for plaintiff suits • 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 formulation monitoring
- Monthly reporting delivered
- Best for: plant-based brands scaling SKU count or reformulating

DIY (SystemsBuilder)

at SystemsBuilder.pro

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

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

Your Risk Profile

Every one of these factors increases your exposure — independently.

UPSTREAM ORIGIN



Soil-Based Contamination

Lead, cadmium, arsenic come from the field, not the factory. Even perfect processing can't remove what the plant absorbed.

BRAND RISK



Health-Halo Collision

Plant-based consumers buy specifically to avoid contamination. A Prop 65 warning directly contradicts the purchase reason.

FORMULATION STACK



Multi-Ingredient Risk

15–25 ingredients per patty. Lead totals are additive across inputs — no single-ingredient test catches real exposure.

DOCUMENTED GAP



9× Higher Than Whey

CR 2025: plant protein averages 9× the lead of whey. 80% of plant-protein powders exceeded Prop 65 lead limits.



Plant-based stacks every risk factor at once. Compliance is structural — not optional.

CALL TO ACTION

Don't wait for a 60-Day Notice.

Make every patty documented and defensible — today.



MANAGED COMPLIANCE

Let us manage it for you.

- End-to-end Prop 65 system setup
- Per-patty formulation monitoring
- Reformulation re-determinations
- Expert-managed execution



DIY LIBRARY

Build it yourself.

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

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

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