

CALIFORNIA PROPOSITION 65

Prop 65 Compliance for River Crabs

Freshwater Source. Bioaccumulated Risk. Watershed-Level Defense.

Presented by: Prop65Compliance.com

Compliance Management by Consultare Inc. Group

Powered by SystemsBuilder.pro



0.3 µg
Mercury MADL

Specific
Watershed

Why River Crabs Are Uniquely Exposed

Freshwater sourcing introduces contamination vectors that marine-only seafood doesn't face.



⚠️ WARNING

This product can expose you to chemicals including mercury, lead, and PCBs — known to the State of California to cause cancer and reproductive harm.

— Typical freshwater crab warning

Not Just Heavy Metals



Methylmercury Bioaccumulation

Mercury MADL is just 0.3 µg/day — lowest of any heavy metal. Freshwater crabs accumulate methylmercury via industrial upstream discharge.



PCBs & Dioxins in Sediment

Freshwater sediment concentrates PCBs and dioxins from historic industrial pollution — bottom-dwelling crabs absorb these directly.



Agricultural Runoff

Pesticides, glyphosate, and atrazine from farmland reach rivers and get absorbed by aquatic species — a freshwater-only risk.



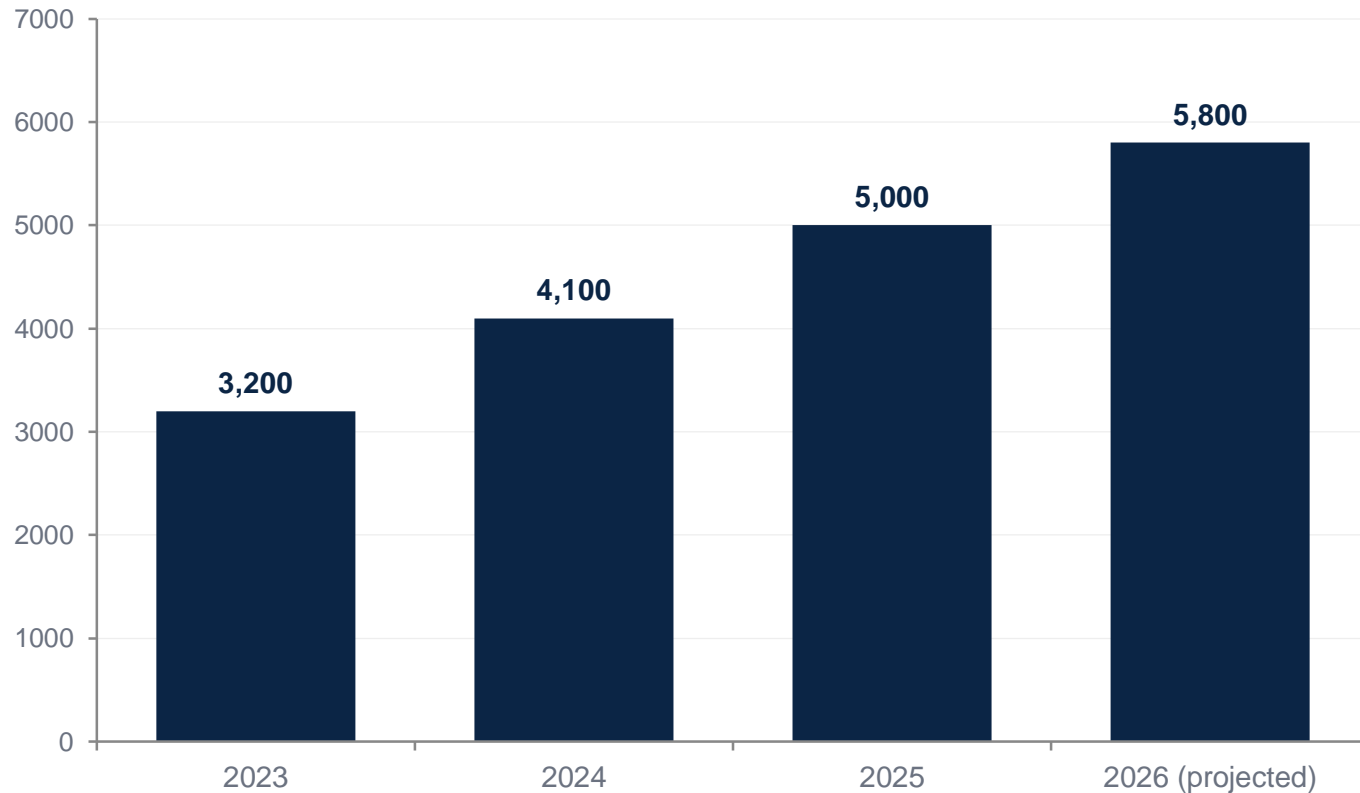
Hepatopancreas Concentration

The crab's 'mustard' (hepatopancreas / tomalley) concentrates contaminants 10–100x higher than muscle tissue — tested separately.

Seafood Enforcement Is a Proven Target

Dried shrimp, anchovies, canned squid, and similar seafood products have received waves of NOV's.

Annual Prop 65 NOVs Issued (All Categories)



Source: OAG 60-Day Notice database. Seafood is a recurring, documented NOV target.

150+

Seafood NOVs (2019)

Plaintiff groups targeted heavy metals in seafood and seaweed products — proven strategy.

Jan 2020

14 Notices in 1 Month

Dried shrimp, anchovies, canned squid hit with NOV's for arsenic, cadmium, and lead.

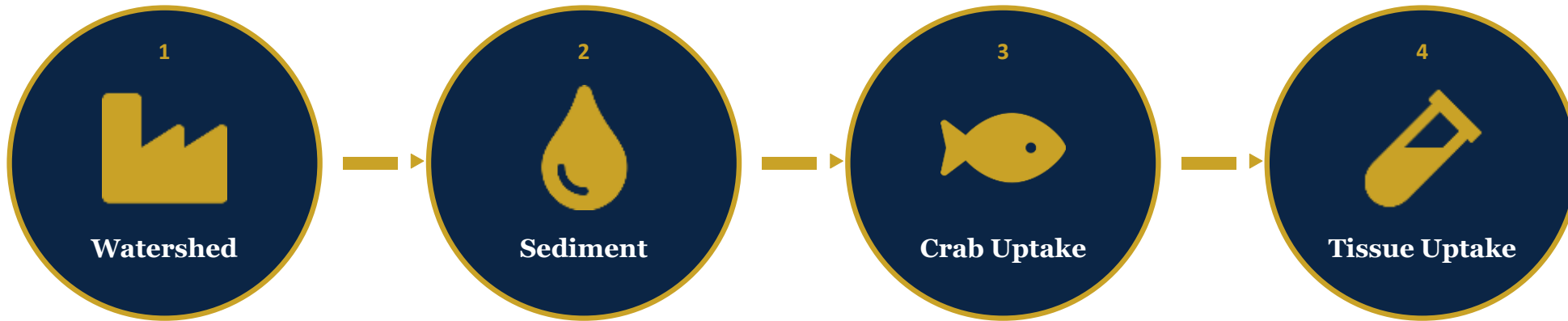
Hg
Pb Cd
PCBs

Crab Target Set

Methylmercury, lead, cadmium, and freshwater-specific PCBs drive exposure.

Why River Crabs Are at Risk

From watershed to plate — each stage concentrates contaminants the next one can't remove.



Industrial discharge, mining runoff, coal-plant deposition feed mercury into freshwater

Methylmercury, PCBs, dioxins, and pesticides settle into river-bottom sediment layers

Bottom-dwelling crabs absorb contaminants through gills, diet, and sediment contact

Hepatopancreas concentrates toxins 10–100x more than muscle — disproportionate risk



Mercury MADL is 0.3 µg/day — the tightest heavy-metal threshold under Prop 65.

A crab with methylmercury from an industrial watershed can exceed the threshold in a single serving.

The Watershed Origin Problem

River-sourced seafood carries contamination the ocean dilutes away.



OCEAN-HARVESTED

Diluted risk profile.

- Open ocean dilutes industrial discharge
- Baseline heavy metals (natural background)
- Fewer agricultural runoff vectors
- Sediment contact limited by fishing depth



RIVER-SOURCED

Concentrated, watershed-specific.

- Industrial discharge flows directly to source
- Agricultural runoff concentrates in rivers
- Coal-plant deposition → methylmercury formation
- Sediment PCBs/dioxins accumulate over decades

Two freshwater crabs from different watersheds can have dramatically different Prop 65 profiles.

Business Impact of Non-Compliance

For crab importers and distributors, a Prop 65 action hits sourcing, shelf, and brand simultaneously.



60-Day Notice of Violation

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



Settlement Exposure

Seafood settlements commonly run \$25K–\$150K+ per SKU — higher for products with tomalley/mustard.



Retailer & Asian-Market Pressure

Specialty Asian markets, H Mart, 99 Ranch, and Amazon Fresh now require documented Prop 65 compliance.



Import Hold & Border Risk

FDA can detain shipments with heavy-metal concerns — a Prop 65 NOV accelerates regulatory scrutiny.

Imported crab shipments get two layers of regulatory scrutiny — FDA at the border, Prop 65 at the shelf.

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 — built for watershed-origin aquatic products.



**Species & Origin
Risk Assessment**



**Mercury, PCB & Dioxin
Testing Oversight**



**Per-Serving
Exposure Math**



**Compliance
Determination**



**Warning Label
Strategy**



**Watershed Origin
Mapping**



**Import & Supplier
Documentation**



**Ongoing
Monitoring**

Every component is documented, traceable, and defensible — per SKU, per origin.

Core Technical Components

The compliance stack underneath every river crab determination we issue.



Methylmercury Species Analysis

Mercury MADL 0.3 µg/day is the tightest heavy-metal threshold. Speciation testing distinguishes methylmercury from total mercury.



PCB Congener Panel

Freshwater sediment carries PCBs that don't appear in marine products — congener-specific testing required for defensibility.



Dioxin & Furan Screening

Dioxins and furans accumulate in bottom-feeding species — screened separately from standard heavy-metal panels.



Hepatopancreas vs Muscle Testing

Tomalley concentrates contaminants 10–100x more than muscle tissue — separately tested and separately determined.



Per-SKU Compliance File

Each format (whole crab, meat, paste, tomalley product) gets its own determination, cross-referenced to watershed origin.

Watershed-to-Shelf Supply-Chain Control

Every crab traces back to a specific watershed. Your compliance file should too.



Two crabs from the same species but different rivers can fail Prop 65 in opposite directions.

The SystemsBuilder Approach

Artifact-based compliance — built once, scales across every crab SKU and watershed.



ARTIFACTS vs RECORDS

You pay for the structure — not the records.

Build once. Use for every shipment.

Example:

ARTIFACT (you pay)

Watershed Screening Program

One document defining how every watershed, species, and tissue fraction is screened and documented.

↓ Generates unlimited ↓

RECORDS (no added cost)

Per-Lot, Per-Watershed Records

Every shipment, every watershed, every tissue fraction 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

- Species & origin scoping
- Watershed risk mapping
- Testing plan per tissue fraction
- Documentation structure

02 STEP Implementation

- Lab coordination (ISO 17025)
- Per-serving exposure math
- Per-lot determination
- Warning-label decisions

03 STEP Monitoring

- Monthly compliance oversight
- Per-shipment review
- Watershed trend analysis
- Audit-ready reporting

Setup Pricing – One-Time Investment

Priced per SKU — each species, origin, and format is a separate compliance file.

COMPLIANCE SYSTEM SETUP

\$1,500
up to 3 crab SKUs

+ \$150
each additional SKU (species / origin / format)

One-time investment to build your system.

SETUP INCLUDES



Species-level risk assessment



Hg/PCB/dioxin testing program



Watershed origin framework



Import documentation 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

+ \$50 / month
per additional SKU

Keeps you continuously compliant.

MONITORING INCLUDES



Per-shipment test review



Watershed trend analysis



Monthly reporting



Species-level summary

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 species-origin-format's lot review with pass/fail determination, MADL comparison, 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.



Watershed & Import Records

Origin attestations, COAs, risk ratings, and corrective actions by watershed and supplier.



Audit-Ready Documentation

Packaged for OAG inquiries, FDA detention responses, and retailer audits 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 mercury speciation, PCB, and dioxin results — no conflicts of interest.



Traceable Decisions

Watershed → harvester → processor → importer → SKU — fully linked.



Structured System

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

Critical for lawsuits • FDA detention responses • Retailer audits • 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 watershed monitoring
- Monthly reporting delivered
- Best for: importers and distributors with multi-origin sourcing

DIY (SystemsBuilder)

at SystemsBuilder.pro

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



TIGHTEST MADL

Methylmercury (0.3 µg)

Lowest heavy-metal threshold under Prop 65. A single serving of contaminated crab can exceed it.



BIOACCUMULATIVE

PCBs & Dioxins

Freshwater sediment carries decades of industrial pollutants that bottom-dwelling crabs absorb directly.



ORIGIN VARIABILITY

Watershed Contamination

Two crabs from the same species but different rivers can have dramatically different exposure profiles.



TISSUE CONCENTRATION

Hepatopancreas ('Mustard')

Tomalley concentrates contaminants 10–100x more than muscle — products using it face amplified risk.



Freshwater-sourced seafood carries risks the ocean dilutes — your watershed is your compliance profile.

CALL TO ACTION

Don't wait for a 60-Day Notice.

Protect your crab product catalog — today.



MANAGED COMPLIANCE

Let us manage it for you.

- End-to-end Prop 65 system setup
- Watershed-level monitoring
- Hg/PCB/dioxin testing oversight
- Expert-managed execution



DIY LIBRARY

Build it yourself.

- \$1-per-artifact library access
- Seafood compliance programs
- Watershed & import templates
- Run it your way, in-house

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

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