

CALIFORNIA PROPOSITION 65

Prop 65 Compliance for Thermal Receipts

Every Receipt Is a Transaction. Every Transaction Is a Potential Violation.

Presented by: Prop65Compliance.com

Compliance Management by Consultare Inc. Group

Powered by SystemsBuilder.pro



\$2,500

Per-Day Penalty

325+

NOVs H1 2025

Receipts Are the 2025 Enforcement Wave

BPS was listed December 2023. Enforcement opened January 2025. 260+ companies already named.



LANDMARK SUIT

Center for Environmental Health v. Aesop USA et al. — SF Superior Court, Case CGC-25-623997, filed April 3, 2025.

— Walmart, McDonald's, Subway, ULTA, Wells Fargo all named

The Template Is Set



BPS Listed — No Safe Harbor

OEHHA added BPS to the Prop 65 list December 29, 2023. No MADL/NSRL established — plaintiffs argue ANY detectable level requires warning.



Skin-Contact Exposure Vector

CEH claims 10-second receipt handling transfers BPS through skin. Hand-to-mouth ingestion adds a second exposure pathway.



\$2,500 Per-Day, Per-Location Penalty

Each branch or location is a separate NOV. Some enforcers argue each receipt is a separate violation — penalties compound fast.



Industry-Agnostic — Anyone Prints Receipts

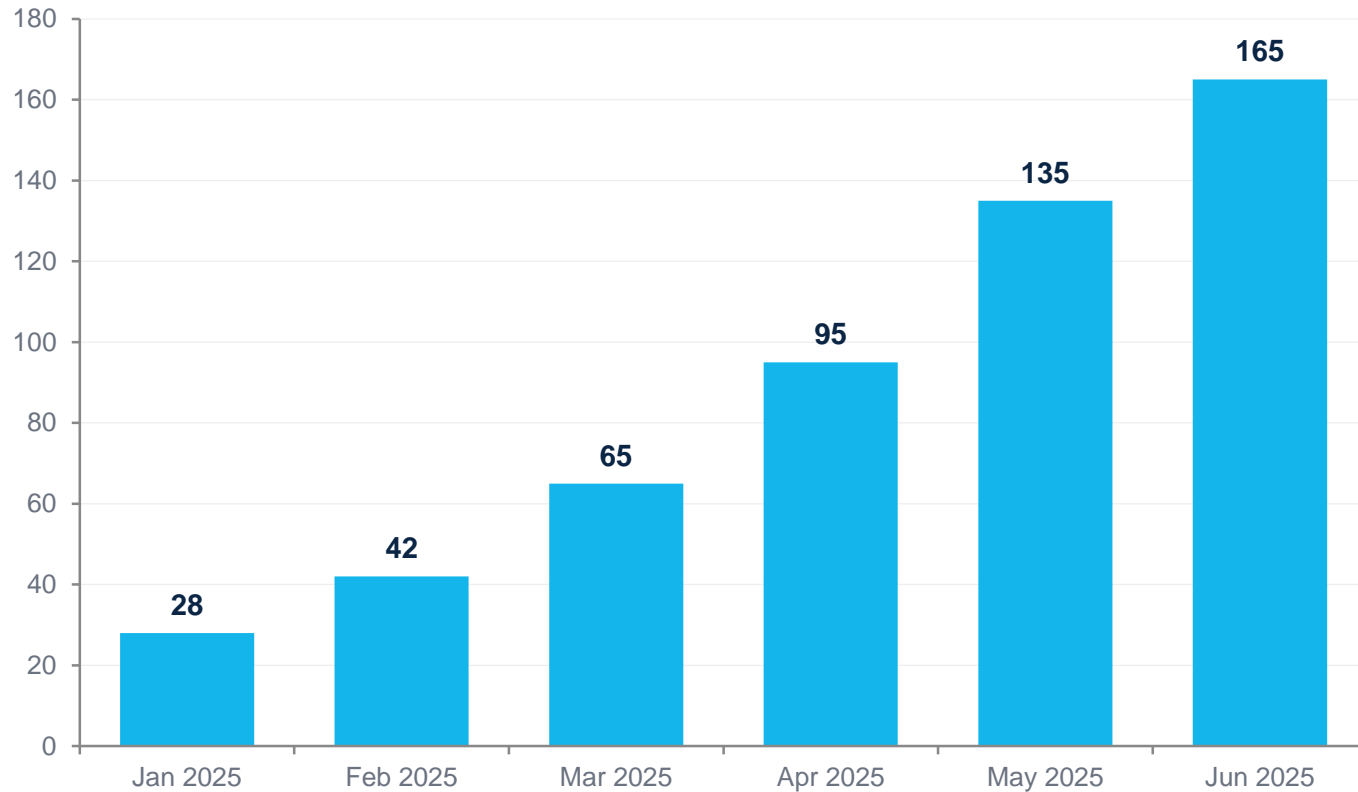
Retailers, restaurants, gas stations, banks, cafes, service businesses — if you issue paper receipts in California, you're exposed.

WHY

BPS Enforcement Is Accelerating

325+ NOVs in H1 2025. Half filed in June 2025 alone. Growth curve is vertical.

BPS-Related NOVs Filed per Month (2025 H1)



Source: OAG 60-Day Notice database. Center for Environmental Health is primary filer. Cumulative NOVs H1 2025: 325+.

260+

Named Companies

Walmart, McDonald's, Subway, ULTA, Wells Fargo, Aesop, and 255+ others.

\$2,500

Per Day / Per Location

Statutory penalty ceiling. Each location = separate NOV. Attorney fees added on top.

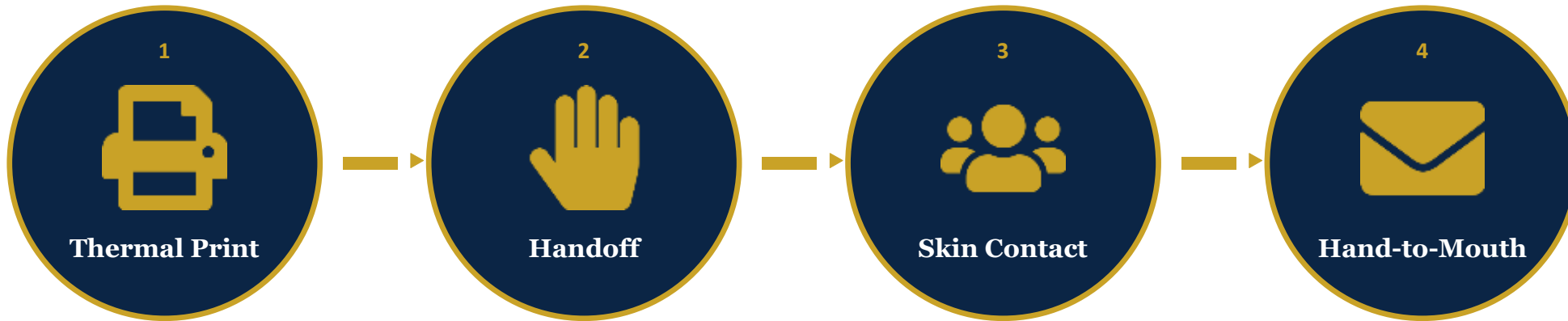
**BPS
BPA**

Receipt Target Chemicals

BPS listed Dec 2023 (repro tox). BPA listed 2015 — ongoing enforcement since May 2016.

How Exposure Happens at the Register

Thermal print → skin contact → dermal absorption → hand-to-mouth. Four steps, seconds long.



BPS is the color developer — heated by the print head, it releases from the paper coating during and after printing

Cashier hands receipt to customer — both are exposed. Customer holds paper for seconds while walking away

BPS absorbs through skin in as little as 10 seconds of contact — CEH's documented exposure claim

After handling the receipt, any hand-to-face contact transfers BPS residue — a secondary ingestion pathway



The exposure is real, quick, and unavoidable — warning must be given BEFORE handoff.

OEHHA: warnings printed ON the receipt don't count — the warning must be given before the customer touches the paper.

Two Paths to Compliance — One Must Be Chosen

OEHHA December 2025 guidance clarified the options. Doing nothing is not one of them.



PATH 1: PHENOL-FREE PAPER

Eliminate the exposure.

- Switch to phenol-free thermal paper
- Supplier-documented BPA/BPS/BPF absence
- No warning needed — exposure eliminated
- Higher per-roll cost, zero ongoing risk



PATH 2: POSTED WARNING

Disclose the exposure.

- OEHHA-compliant signage AT register
- Warning BEFORE handoff, not printed on receipt
- Also covers employee/cashier exposure
- Lower cost, but signage audit documentation required

Most businesses choose Path 2 short-term and migrate to Path 1 over time — both need documentation.

Business Impact of Non-Compliance

Unlike product-based Prop 65 cases, receipt NOVs compound daily — and apply per location.



60-Day Notice of Violation

CEH alone has filed nearly a dozen NOVs naming 200+ companies in 2025. Notices specifically demand receipt SKU specs and supplier records.



Multi-Location Penalty Stack

\$2,500 per day × each location × each day of continuing exposure + attorney fees. Franchise chains face compound exposure.



Franchise Dual-Liability

Franchisors AND franchisees can both be named. Procurement and POS choices at HQ create liability downstream.



5-Day Grace Period Available

California grace period allows prompt post-NOV remediation to limit penalties — but only if you act within 5 business days.

Retail-seller defense is available — but only with documented procurement and remediation records.

Why Prop65Compliance.com

Compliance-focused. Not a law firm. System-based — not one-time fixes.



Compliance-Focused

We don't litigate — we build the system that prevents litigation.



System-Based Approach

Switching paper once doesn't protect you. A per-location, per-supplier 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 location
documented.
Every register
compliant.**

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

What We Deliver

An end-to-end Prop 65 program — tuned for point-of-sale thermal paper compliance.



**Location-Level
Risk Assessment**



**Paper Stock
BPS/BPA Screening**



**Signage Audit
& Placement**



**Compliance
Determination**



**Warning Language
Implementation**



**Supplier Attestation
Program**



**Documentation
System**



**Ongoing
Monitoring**

Every component is documented, traceable, and audit-ready — per location, per supplier.

Core Technical Components

The compliance stack underneath every location's thermal-paper determination.



Paper Stock Analytical Testing

BPA, BPS, and BPF screening per ISO 17025 labs — verify 'phenol-free' claims rather than trusting supplier marketing language.



Supplier Phenol-Free Attestation

Documented written confirmation from paper supplier that rolls are BPA-, BPS-, AND BPF-free — all three, not just one.



Register-Level Signage Audit

Physical audit confirming OEHHA-compliant warning is visible AT the point of sale BEFORE receipt handoff — not after, not on the receipt.



Employee Exposure Documentation

OEHHA specifically flags cashier/worker exposure. Occupational acknowledgment and training records separate from customer warnings.



Per-Location Compliance File

Each store, each register, each paper order: supplier, SKU, test results, signage status, training records, grace-period timeline.

Procurement-to-Register Supply-Chain Control

Your compliance is only as strong as your paper supplier's chemistry documentation.



'BPA-free' on the invoice is not the same as 'phenol-free' on the paper — documentation matters.

The SystemsBuilder Approach

Artifact-based compliance — built once, scales across every location and every register.



ARTIFACTS vs RECORDS

You pay for the structure — not the records.

Build once. Use for every location.

Example:

ARTIFACT (you pay)

POS Compliance Program

One document defining how every paper supplier, register, location, and signage placement is verified and documented.

↓ Generates unlimited ↓

RECORDS (no added cost)

Per-Location, Per-Roll Records

Every store, every paper order, every signage audit 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

- Location & register scoping
- Paper supplier mapping
- Signage audit baseline
- Documentation structure

02 STEP Implementation

- Paper chemistry testing
- Signage placement & review
- Cashier training protocol
- Warning-language approval

03 STEP Monitoring

- Monthly compliance oversight
- Per-location signage checks
- Supplier-change re-verification
- Audit-ready reporting

Setup Pricing – One-Time Investment

Priced per location — each store, register, or service site is a separate compliance file.

COMPLIANCE SYSTEM SETUP

\$1,500
up to 3 locations

+ \$150
each additional location (store / register / service site)

One-time investment to build your system.

SETUP INCLUDES



Location-level risk assessment



Paper stock chemistry testing program



Register signage placement review



Documentation system setup



Compliance determination structure

Monthly Monitoring – Ongoing Oversight

Continuous compliance. Scales with your location count and procurement cycles.

ONGOING COMPLIANCE OVERSIGHT

\$500
per month — up to 7 locations

+ \$50 / month
per additional location

Keeps you continuously compliant.

MONITORING INCLUDES



Per-shipment paper review



Signage compliance checks



Monthly reporting



Trend analysis by supplier

Cancel anytime. No long-term contracts.

Testing Monitoring Fees

Per-event oversight — pay only when paper chemistry is verified.

\$35

per testing monitoring event

Per supplier / per paper SKU — covers lab-report review, threshold comparison, compliance determination & documentation update.

WHAT THE \$35 COVERS

- Lab report review
- Phenol detection threshold comparison
- Per-supplier 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 location.



Per-Location Compliance Determinations

Each location's paper, signage, and training status with pass/fail determination and reviewer sign-off.



Monthly Summary Reports

Rolling snapshot of all locations, supplier changes, signage checks, and open action items.



Compliance Monitoring Logs

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



Supplier & Paper-Lot Records

Attestations, lab results, and corrective actions by paper supplier and thermal-product type.



Audit-Ready Documentation

Packaged for OAG inquiries, CEH discovery requests, and retail-seller-defense filings on 24-hour notice.

HOW

Built for Defensibility

The retail-seller defense requires documented procurement and prompt post-NOV remediation.



Documented Procurement

Supplier attestations, invoices, and lot records — the retail-seller defense foundation.



Verified Lab Testing

ISO 17025 BPA/BPS/BPF results per paper SKU — no reliance on supplier marketing language.



Traceable Decisions

Supplier → shipment → register → signage status — fully linked per-location.



Structured System

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

Critical for plaintiff response • Retail-seller defense • Grace-period filings • Franchise documentation

Managed Service vs. DIY

Same system. Different execution — you choose who drives.

MANAGED SERVICE

by Consultare Inc. Group

- Hands-off compliance execution
- Expert-managed multi-location monitoring
- Monthly reporting delivered
- Best for: multi-location retailers, restaurants, service chains, franchisors

DIY (SystemsBuilder)

at SystemsBuilder.pro

- Self-managed execution
- \$1-per-artifact library access
- In-house facilities/compliance team runs it
- Best for: single-site operators with in-house compliance

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

Your Risk Profile

Every one of these factors increases your exposure — independently.

ACTIVE ENFORCEMENT



325+ NOVs Already Filed

CEH and others filed 325+ BPS-receipt NOVs in H1 2025 alone. Walmart, McDonald's, Subway, ULTA, Wells Fargo among named.

PENALTY STRUCTURE



Per-Day, Per-Location

\$2,500/day penalty ceiling per location. Multi-location chains face exposure that compounds daily and geographically.

NO SAFE HARBOR



Zero-Detection Plaintiff Argument

OEHHA hasn't set a MADL for BPS. Plaintiffs argue any detectable level = violation. Defense requires documented exposure math.

DUAL EXPOSURE



Customers AND Employees

OEHHA flagged occupational exposure too. Cashiers handle hundreds of receipts daily — workplace liability stacks on top.



The BPS enforcement wave is 2025's fastest-growing Prop 65 category. Act before the NOV arrives.

CALL TO ACTION

Don't wait for a 60-Day Notice.

Make every register documented and defensible — today.



MANAGED COMPLIANCE

Let us manage it for you.

- End-to-end Prop 65 system setup
- Per-location signage & paper monitoring
- Supplier-change re-determinations
- Expert-managed execution



DIY LIBRARY

Build it yourself.

- \$1-per-artifact library access
- POS & retail compliance programs
- Forms, logs & signage templates
- Run it your way, in-house

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

Prop65Compliance.com • [SystemsBuilder.pro](#)