

CALIFORNIA PROPOSITION 65

Prop 65 Compliance for Salad Dressing

Multi-Ingredient Formulation. Multi-Chemical Risk.

Presented by: Prop65Compliance.com

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

Powered by [SystemsBuilder.pro](#)



Balsamic

OEHA Flagged

6-12

Ingredients

Why Salad Dressings Are Uniquely Exposed

Every bottle stacks 6–12 ingredients and 3+ packaging components. Each one is a possible Prop 65 hit.



⚠️ WARNING

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

— Typical dressing category warning

Stacked Risk, Stacked Defense



Balsamic Vinegar Is OEHHA-Flagged

OEHHA specifically lists balsamic and aged vinegars as known lead sources. Every vinaigrette formulation is at risk.



Herbs & Spices Carry Heavy Metals

Imported oregano, paprika, turmeric, garlic, and black pepper — standard dressing seasonings — are recurring lead NOV targets.



Base Oils Carry Their Own Risk

Olive, avocado, canola, and soybean oils each have distinct heavy-metal and packaging-migration profiles.



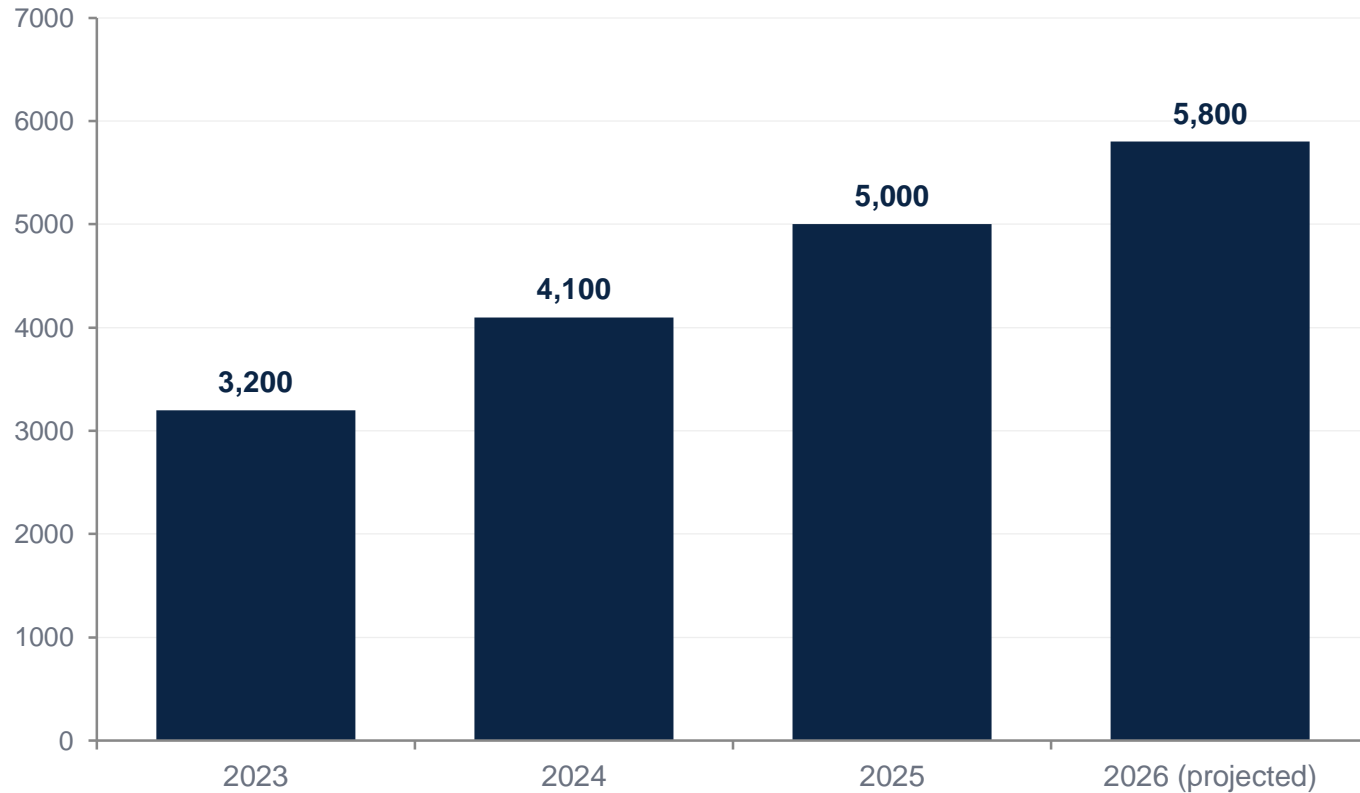
'Clean Label' Litigation Overlay

2026 Sheehan class actions target 'no artificial preservative' claims on products containing lecithin, xanthan gum, and other common dressing emulsifiers.

Dressings Sit Inside the Most-Enforced Category

Food & supplements drive 38% of all Prop 65 NOVs — and dressings check every subcategory box.

Annual Prop 65 NOVs Issued (All Categories)



Source: OAG 60-Day Notice database. Salad mixes and prepared-food SKUs received 2025 NOVs for cadmium.

~38%

Food & Supplements

Largest single category of Prop 65 enforcement — dressings sit at its center.

\$19.85M

2025 Settlements

293 in-court Prop 65 settlements in 2025 alone — mostly paid to plaintiff attorneys.

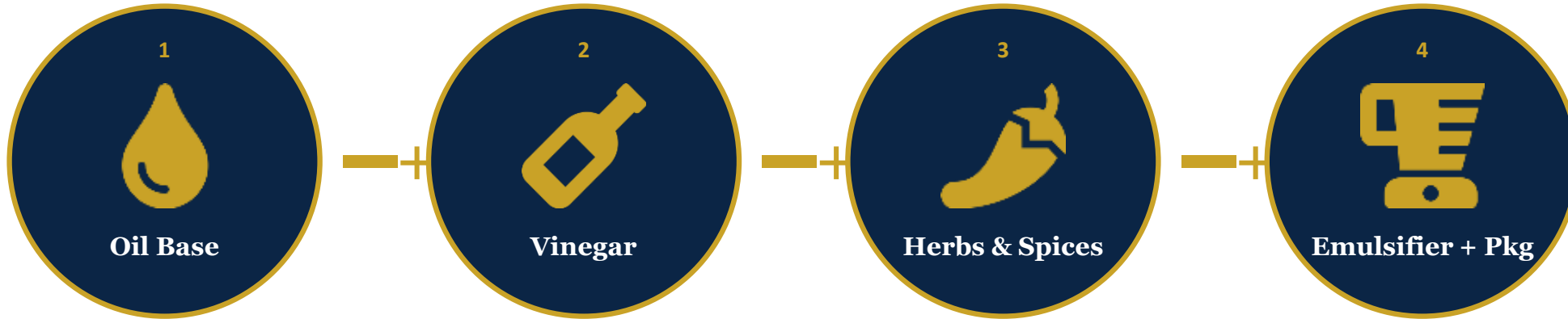
Lead
Cadmium
DEHP

Dressing Target Set

Balsamic vinegar lead, herb-blend cadmium, and plastic packaging phthalates drive NOVs.

The Risk Stacks With Every Ingredient

A single bottle compounds exposure from four independent chemical vectors.



Olive, avocado, soybean — each oil has its own heavy-metal and solvent-residue profile

Balsamic, red wine, apple cider — OEHHA specifically cites aged vinegars as lead sources

Garlic, oregano, paprika, turmeric, black pepper — all common lead & cadmium NOV targets

Lecithin, xanthan, bottle/cap/liner — each introduces its own potential Prop 65 exposure



Your risk isn't one ingredient — it's the combination.

A dressing with 0.2 µg lead from vinegar + 0.2 µg from herbs + 0.2 µg from packaging = MADL exceeded.

The Formulation Complexity Problem

Every reformulation, every new SKU, every supplier change resets the risk calculation.



SINGLE-INGREDIENT FOOD

One ingredient. One determination.

- Example: olive oil, supplement powder
- Test the ingredient, determine exposure
- Compliance file = one primary contaminant set
- Reformulation changes are rare



MULTI-INGREDIENT DRESSING

6–12 ingredients. Compounded risk.

- Every ingredient is a separate exposure input
- Heavy metals sum across the formulation
- Supplier change on one = full re-determination
- 'Clean label' claims amplify litigation risk

Dressings need a system — not a single test. Testing the finished bottle misses the upstream risk.

Business Impact of Non-Compliance

For dressing brands, a Prop 65 action compounds across the shelf set.



60-Day Notice of Violation

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



Settlement Exposure

Food settlements routinely run \$20K–\$100K+ per SKU — multiply across your dressing line.



Retailer & Amazon Pressure

Whole Foods, Sprouts, Target, and Amazon require documented Prop 65 compliance — lose the listing, lose the channel.



'Clean Label' Exposure

'All-natural' and 'no preservative' positioning amplifies class-action risk alongside Prop 65 NOV's.

One NOV on a flagship vinaigrette rarely stops there — plaintiffs follow the supplier into the rest of the line.

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 — tailored for multi-ingredient formulations.



**Formulation-Level
Risk Assessment**



**Heavy Metal & DEHP
Testing Oversight**



**Per-Serving
Exposure Math**



**Compliance
Determination**



**Warning Label
Strategy**



**Ingredient Supplier
Program**



**Documentation
System**



**Ongoing
Monitoring**

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

Core Technical Components

The compliance stack underneath every dressing determination we issue.



Heavy Metal Panel Testing

Oversight of Lead (MADL 0.5 µg/day), Cadmium (MADL 4.1 µg/day), Arsenic, and Mercury at ISO 17025 labs — tested on finished product AND key inputs.



Vinegar Acid-Migration Screening

Balsamic and aged vinegars specifically screened for lead. OEHHA-flagged category — document every vinegar supplier.



Herb & Spice Blend Review

Imported garlic, oregano, paprika, turmeric, pepper screened per-lot. Spice blend changes trigger re-determination.



Packaging Migration Testing

DEHP and other phthalates in flexible plastics; BPA/BPS in metal can linings and caps — screened per packaging component.



Per-SKU Compliance File

Each finished dressing SKU gets its own compliance determination, cross-referenced to formulation and packaging records.

Ingredient Supply-Chain Control

Most dressing NOVs trace back to one ingredient supplier — catch it at intake.



One out-of-spec spice lot or vinegar supplier can compromise every SKU that uses it.

The SystemsBuilder Approach

Artifact-based compliance — built once, scales across every dressing SKU.



ARTIFACTS vs RECORDS

You pay for the structure — not the records.

Build once. Use for every dressing.

Example:

ARTIFACT (you pay)

Formulation Screening Program

One document defining how every ingredient, blend, and package is screened, reviewed, and documented.

↓ Generates unlimited ↓

RECORDS (no added cost)

Per-SKU, Per-Batch Records

Every dressing SKU, every batch, 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
- Ingredient risk classification
- Testing plan per SKU
- Documentation structure

02 STEP Implementation

- Lab coordination (ISO 17025)
- Per-serving exposure math
- Per-SKU 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 flavor and format is a separate compliance file.

COMPLIANCE SYSTEM SETUP

\$1,500
up to 3 dressing SKUs

+ \$150
each additional SKU (flavor / format)

One-time investment to build your system.

SETUP INCLUDES



Formulation-level risk assessment



Heavy metal + packaging testing program



Per-serving exposure framework



Documentation system 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-batch test review



Reformulation re-determination



Monthly reporting



Trend analysis by supplier

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 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 dressing's batch 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.



Ingredient & Packaging Records

Attestations, COAs, risk ratings, and corrective actions by supplier and packaging component.



Audit-Ready Documentation

Packaged for OAG inquiries, retailer audits, and Amazon 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 SKU determination has a record, a reviewer, and a date.



Verified Lab Testing

ISO 17025 independent results — no conflicts of interest.



Traceable Decisions

Ingredient supplier → lot → formulation → batch → SKU — fully linked.



Structured System

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

Critical for lawsuits • 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 monitoring
- Monthly reporting delivered
- Best for: dressing brands scaling SKU count or reformulating frequently

DIY (SystemsBuilder)

at SystemsBuilder.pro

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

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

Your Risk Profile

Every one of these factors increases your exposure — independently.



OEHHA - FLAGGED

Balsamic Vinegar Lead

OEHHA specifically names aged vinegars as a known lead source — vinaigrettes sit directly in scope.



SPICE BLEND RISK

Herb & Spice Contamination

Imported garlic, oregano, paprika, turmeric, and pepper all carry recurring Prop 65 NOV activity.



FORMULATION STACK

Compounding Exposure

Heavy metals accumulate across 6–12 ingredients — no single test covers the finished bottle's risk.



LITIGATION OVERLAY

'Clean Label' Class Actions

'No artificial preservative' claims on dressings containing lecithin or xanthan trigger Sheehan-style lawsuits.



If you sell dressings in California, your risk stacks every time a customer pours.

CALL TO ACTION

Don't wait for a 60-Day Notice.

Protect your dressing catalog — today.



MANAGED COMPLIANCE

Let us manage it for you.

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



DIY LIBRARY

Build it yourself.

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

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

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