

SAFEGUARDS

CONSUMER GOODS AND RETAIL

CONSUMER PRODUCTS

NO. 180/14 OCTOBER 2014

CALIFORNIA PROP 65 REFORMULATION OF CHEMICALS IN CONSUMER PRODUCTS

Proposition 65 (Prop 65) is the 'Safe Drinking Water and Toxic Enforcement Act of 1986', a ballot initiative passed overwhelmingly by California residents in 1986. Since its enactment, there have been numerous lawsuits which resulted in the reduction of carcinogenic and reproductive chemicals by reformulations of consumer products containing such chemicals¹.

Prop 65 is now over 27 years old and has been effective in reducing exposures to toxic chemicals. Of the 850 or so listed chemicals, consumer products containing lead, phthalates and/ or flame retardants have been consistently targeted in the last few years².

Since the beginning of 2014, a number of Prop 65 settlements have been reached for the reformulation of flame retardants, lead, phthalates and other chemicals in a wide range of products, including but not limited to, bicycle lock, dish racks, seat protectors, polyurethane foam in acoustic and/ or soundproofing, massaging pillow, nursing pillows and activity gyms.

Highlights of these consent agreements are summarised in Table 1.



¹ [Proposition 65](#)

² [SGS-Safeguard 150/14 and references therein](#)

TABLE 1.

ITEM	SUBSTANCE	PRODUCT	REFORMULATION
1	DEHP	<ul style="list-style-type: none"> Bicycle lock Steering wheel lock 	≤ 1000 ppm
2	DEHP	Bicycle storage hooks with vinyl/PVC hooks	≤ 1000 ppm
3	DEHP	Daily organizer	≤ 1000 ppm
4	DEHP	Dish racks	≤ 1000 ppm
5	DEHP	Seat post binders with vinyl/PVC handles	≤ 1000 ppm
6	DEHP	Seat protectors	≤ 1000 ppm
7	DEHP Lead	Computer laptop locks	≤ 1000 ppm DEHP ≤ 100 ppm Lead
8	Flame retardant	Acoustic and/or soundproofing foam composed of or containing polyurethane	TCEP, TDBPP, TDCPP and other flame retardants prohibited
9	Flame retardant	Polyurethane foam in foam-cushioned massaging pillow	≤ 25 ppm each of TDCPP, TCEP and TDBPP
10	Flame retardant	Polyurethane foam in foam-cushioned nursing pillows and activity gyms	≤ 25 ppm each of TDCPP and TDBPP
11	Lead	<ul style="list-style-type: none"> AM/FM Radios Notebook Travel Kits Wireless Transmitters 	< 100 ppm
12	Lead	Bowls with decorated designs	<p>Exterior decoration, exclusive of lip and rim: ≤ 1 µg (NIOSH 9100) ≤ 90 ppm ≤ 0.99 ppm (corrected internal volume) (ASTM C 927-99) including lip and rim</p> <p>Interior decoration and lip and rim: No detectable lead (ASTM C 927-80, 2009)</p>
13	Lead	Brass plumbing products (fittings include pipes, nipples, plugs, caps, nuts, unions, reducing unions, swivels, tees, adapters, and elbows)	≤ 100 ppm otherwise warning
14	Lead	Color coated craft wire	≤ 1.0 µg (NIOSH 9100) ≤ 100 ppm Otherwise warning required
15	Lead	Electronic device cases made with leather, vinyl or imitation leather materials	Paint or other surface coating: ≤ 90 ppm

16	Lead	Vinyl/PVC football flags	< 1.0 µg (NIOSH 9100) < 100 ppm
17	Phthalates	Sunglasses	≤ 1000 ppm each of DEHP, BBP and DBP
18	Phthalates	Sunglasses Prescription frames	≤ 1000 ppm each of DEHP and DBP

DEFINITIONS

NO.	ACRONYM	NAME
1	BBP	Benzylbutyl phthalate
2	DBP	Dibutyl phthalate
3	DEHP	Di-(2-ethylhexyl) phthalate
5	TCEP	Tris-(2-chloroethyl) phosphate
6	TDBPP	Tris(2,3-dibromopropyl) phosphate
7	TDCPP	Tris(1,3-dichloro-2-propyl) phosphate

Throughout our global network of laboratories, we are able to provide a range of services, including analytical testing and consultancy for flame retardants, lead, phthalates and other restricted substances in consumer products for Prop 65 and international markets. Please do not hesitate to contact us for further information.



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