

SAFEGUARDS

CONSUMER GOODS AND RETAIL

HARDGOODS

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CALIFORNIA PROP 65 REFORMULATION OF 4,4'-METHYLENEDIANILINE IN NYLON COOKING UTENSILS

[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 chemicals.

Prop 65 is now more than 28 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 flame retardants](#) have been consistently targeted over the years.

On 1 January 1988, [4,4'-methylenedianiline](#) (4,4'-MDA) was listed as a chemical known to the State of California to cause cancer. Since 1 January 1989, businesses have been required to provide a '[clear and reasonable warning](#)' (Prop 65 warning label) before knowingly and intentionally exposing anyone to 4,4'-MDA. Even though the chemical has been listed for more than 25 years, until recently there has been no enforcement action for this listed chemical under Prop 65 in consumer products.

Since the beginning of 2015, two Prop 65 settlements have been reached for the reformulation of 4,4'-MDA in nylon cooking utensils. The parties in each of the 2 settlements agreed to reformulate 4,4'-MDA content to no more than 200 ppm. Highlights of one of the settlements are summarised in Table 1.



TABLE 1.

ENTRY	SUBSTANCE	PRODUCT	METHOD	REFORMULATION
1	4,4'-MDA CAS# 101-77-9	Nylon cooking utensils	EN 14362 or equivalent / GCMS	≤200 ppm

SGS

Throughout our global network of laboratories, we are able to provide a range of services, including analytical testing and consultancy, for 4,4'-MDA in food contact nylon products for California and international markets. Please do not hesitate to contact us for further information.



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