

SAFEGUARDS

CONSUMER GOODS AND RETAIL

CONSUMER PRODUCTS

NO. 094/14 MAY 2014

CALIFORNIA PROP 65 REFORMULATION OF LEAD AND OTHER CHEMICALS

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 25 years old and has been effective in reducing or eliminating the use of toxic chemicals in consumer products. Of the 850 or so listed chemicals, lead-containing consumer products have been consistently targeted over the years².

In the latter half of 2013, a number of Prop 65 settlements have been reached for the reformulation of lead and other chemicals in a variety of products, including but not limited to: toiletries, hair sprays, BBQ grill brushes, metal rakes, duct tapes, sponges and footwear (adult and children).

Following is the summary of these settlements for stated chemicals in Table 1.



¹ [Prop 65](#)

² [SGS-Safeguard 193/13](#)

TABLE 1.

ITEM	SUBSTANCE	PRODUCT	REFORMULATION
1	<ul style="list-style-type: none"> Benzophenone Cocamide Diethanolamine or Cocamide DEA 	<ul style="list-style-type: none"> Hair sprays Shampoos 	HAIR SPRAY Not to contain Benzophenone SHAMPOO Not to contain cocamide diethanolamine (DEA)
2	Cocamide DEA	Shampoos and liquid soaps, including without limitation to <ul style="list-style-type: none"> Bath balms Body washes Bubble baths Hand soaps Soaps Shower gels 	Product, unless intentionally added, must not contain cocamide DEA
3	Lead	<ul style="list-style-type: none"> BBQ grill brushes BBQ grill brush heads 	Warning label
4	Lead	Brass needle cases and other products containing brass	$\leq 1.0 \mu\text{g}$ (NIOSH 9100) otherwise warning
5	Lead	Christmas house garland	≤ 100 ppm
6	Lead	Metal rakes	≤ 100 ppm
7	Lead	<ul style="list-style-type: none"> Duct tape Mini-vacuums, Screwdrivers 	≤ 100 ppm
8	Lead	Pop-up drain assemblies	Warning label
9	Lead	Sponges	≤ 100 ppm
10	Lead	Tyre scrubber	≤ 100 ppm
11	Lead	Valve handles	< 100 ppm
12	Lead	Wheel brushes	≤ 100 ppm
13	Lead Phthalate	Footwear (children and adult)	< 100 ppm lead and < 1000 ppm each of DEHP and DBP
14	Lead Phthalate	Hose bibs with vinyl / PVC grips	≤ 100 ppm lead and ≤ 1000 ppm each of DEHP and DBP

DEFINITIONS

ITEM	ACRONYM	NAME
1	DBP	Dibutyl phthalate
2	DEHP	Di-(2-ethylhexyl) phosphate

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



FOR ENQUIRIES:

Global Competence Support Centre:
gcsc@sgs.com

HK– Hingwo Tsang Tel: +852 2774 7420 or
Hingwo.Tsang@sgs.com

Asia – Hong Kong,
 Tel: +852 2334 4481,
mktg.hk@sgs.com

Australasia – Perth.
 Tel: +61 (0) 3 9790 3418
au.cts@sgs.com

Europe – London – UK.
 Tel: +44(0) 203 008 7860
gb.cts.sales@sgs.com

Africa & Middle East – Turkey.
 Tel: +90 212 368 40 00
sgs.turkey@sgs.com

Americas – USA.
 Tel: +1 973 575 5252
uscts.inquiries@sgs.com

www.sgs.com/cgmr

© SGS Group Management SA – 2014– All rights reserved
 - SGS is a registered trademark of SGS Group Management SA. This is a publication of SGS, except for 3rd parties' contents submitted or licensed for use by SGS. SGS neither endorses nor disapproves said 3rd parties contents. This publication is intended to provide technical information and shall not be considered an exhaustive treatment of any subject treated. It is strictly educational and does not replace any legal requirements or applicable regulations. It is not intended to constitute consulting or professional advice. The information contained herein is provided "as is" and SGS does not warrant that it will be error-free or will meet any particular criteria of performance or quality. Do not quote or refer any information herein without SGS's prior written consent.