



January 1, 2020

Regarding: California Proposition 65 (Prop 65) Compliance and Polymeric US's Products

We receive a substantial number of inquiries regarding the compliance of our products with the regulatory issue known as Prop 65 (California Proposition 65). The purpose of this communication is to clarify the issue from an ink manufacturer's perspective.

The requirement of Prop 65 is for businesses to provide warnings for their products if there is potential for exposure to substances that the State of California has determined can cause cancer or reproductive harm. This regulation states that a warning must be placed on the product unless the listed Prop 65 substances are present at a low enough level that they meet Prop 65's rigorous criteria for posing no significant risk of cancer, birth defects or reproductive harm.

Some of Polymeric US's products may contain Prop 65 chemicals. If so, the presence of the Prop 65 chemical is indicated on the SDS sheet. However, the mere presence of Prop 65 listed chemicals in the unused ink does not necessarily mean that the end-user (printer) is also required to place a Prop 65 warning on its printed product. Most of the products that we manufacture are changed significantly in the printing process and the potential for exposure to the Prop 65 component is altered.

Additionally, the Prop 65 requirements are clear that the need to warn is based on exposure and exposure is dependent on how the product is used. These warnings are only applicable if the end-use of the product is such that the exposure exceeds the Prop 65 "maximum allowable dose level (MADL)" and/or "no significant risk level (NSRL)." If exposure is lower than these levels, then no warning is required. The primary issue with the above two criteria is that these are dependent on actual exposure levels which is difficult for Polymeric US to determine since the products are used on a variety of substrates and applied in several different ways. It is incumbent on the end-user to be fully involved in making the Prop 65 warning decision.

Polymeric US has no ultimate control regarding how the product is used. Due to this, Polymeric US cannot provide a guarantee pertinent to the actual exposure levels to any Prop 65 chemical. Our recommendation is that each end-user carefully review the Prop 65 regulation in order to determine if a Prop 65 warning is warranted.

For further information regarding Prop 65 Polymeric US recommends visiting the following web sites: <https://oehha.ca.gov/proposition-65> and <https://www.p65warnings.ca.gov/>. For further assistance or questions regarding this issue, please contact our Regulatory Compliance department at 816-221-5567