

Prop 65 FAQ for DSS

What is Prop 65? California Proposition 65 (aka the Safe Drinking Water and Toxic Enforcement Act) is a law enacted by California voters that requires businesses to notify consumers if products they make or sell contain chemicals known to cause cancer, birth defects, or other reproductive harm, unless those chemicals are below levels deemed not to be significant. The state has published a list containing hundreds of chemicals for which warnings might be required. Some of these chemicals are present in products that ASSA ABLOY Door Security Solutions sells (manufactured by: Sargent, Corbin Russwin, Yale, Adams Rite, Ceco Door, Curries, McKinney, Medeco, Rockwood, Rixson, Norton, Pemko, HES, Securitron). As a result, for those products that are sold to California consumers, we may be required to provide a "clear and reasonable" warning before knowingly and intentionally exposing anyone to a listed chemical. If a warning is required, the warning can be given by a variety of means, including labelling a product, or providing a warning in the product packaging. New warning requirements take effect on Aug. 30th 2018. More information can be found at:

<https://www.p65warnings.ca.gov/new-proposition-65-warnings>

What is product compliance? Proposition 65 is administered by the California Office of Environmental Health Hazard Assessment (OEHHA), which publishes a list of chemicals known to cause cancer or birth defects. Proposition 65 requires that a business selling products that contain listed chemicals in excess of defined levels, provide a clear and reasonable warning of the potential hazard. No warning is required on products determined not to exceed "Safe Harbor" levels of exposure.

How is it enforced? Prop 65 is enforced by the CA Attorney General's office, any district attorney or city attorney in cities with a population over 750,000. Any individual acting in the public interest may enforce Prop 65 by filing a lawsuit against a business alleged to be in violation. Penalties include fines of up to \$2500 a day/per violation.

Who is responsible for providing warnings? Under the new warning regulations, the primary responsibility for providing Proposition 65 warning is imposed on product manufacturers, producers, packagers, importers, suppliers and/or distributors. For consumer product exposures, businesses in the above categories must either provide a warning on the product, or provide notice and warning materials to "the authorized agent" for a retail seller and receive an acknowledgment that the notice and materials were received. The retail seller is responsible for placement and maintenance of the warning materials they have received.

Why is this important to a manufacturer? Our products may contain chemicals on the Prop 65 list- specifically lead, hex chrome, and styrene.

We can choose to: change the composition of our product; appropriately label our product/package/website, and/or declare hazardous materials.

Why is this important to a customer? Prop 65 impacts any company manufacturing or selling product in the state of California. Customers (consumers, installers, etc) who may be exposed to products need to understand exposure limits and risks; as well as how to utilize product labels.

What is our current status? The new Proposition 65 warning regulations will apply to products manufactured on or after August 30, 2018, and require a more detailed product label. ASSA ABLOY Door Security Solutions will ensure that its products (manufactured by: Sargent, Corbin Russwin, Yale, Adams Rite, Ceco Door, Curries, McKinney, Medeco, Rockwood, Rixson, Norton, Pemko, HES, Securitron) that require Proposition 65 warnings are labelled in accordance with these new regulations, including identification of specific chemicals. Specific product labels will reflect the chemical composition of the labelled product.

What is our future status? We at ASSA ABLOY Door Security Solutions are committed to providing safe and compliant products (manufactured by: Sargent, Corbin Russwin, Yale, Adams Rite, Ceco Door, Curries, McKinney, Medeco, Rockwood, Rixson, Norton, Pemko, HES, Securitron) for our customers. Our goal is to continually work with our vendors, supply chain partners, and resellers to source responsibly and to comply with regulatory and reporting requirements, including providing product warnings to our customers as required by Proposition 65.

Who are our internal resources?

productcompliance.americas@assaabloy.com

Where are our education and advocacy materials located?

<https://www.assaabloydss.com/en/local/dss/solutions-by-topic/sustainability/product-stewardship/prop-65/>