

CALIFORNIA PROP65

WARNING DECLARATION

REVIEW CARRIED OUT BY YAZZ ALI	DATE OF REVIEW 09/07/2026	DATE OF NEXT REVIEW 09/07/2027
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INTRODUCTION

The Safe Drinking Water and Toxic Enforcement Act of 1986 requires that the Governor of California revise and republish at least once per year the list of chemicals known to the State to cause cancer or reproductive toxicity. This is commonly known as Proposition 65 and applies to any products sold or distributed within the State of California. The official list is updated continuously and was last fully issued on 8 December 2025, containing more than 1,050 substances.

PROPOSITION 65 COMPLIANCE APPROACH

Under the regulations, a company must determine if an exposure exceeds state-defined 'Safe Harbour'

The Company evaluates consumer exposure dynamically and concludes it exceeds the 'No Significant Risk Level' (NSRL) or 'Maximum Allowable Dose Level' (MADL)

The Company chooses to provide a clear and reasonable warning based on its knowledge that listed chemicals are present in its raw materials, without attempting to run costly laboratory exposure assessments

Trojan Special Fasteners Ltd has elected to follow the **second approach**. Fasteners manufactured by the Company may contain trace elements of listed chemicals that fall below the official 'significant risk level', or may even be nil. However, to ensure absolute statutory protection for our supply chain, a compliant Proposition 65 warning notification accompanies all products manufactured by the Company.

CHEMICALS PRESENT OR POTENTIALLY PRESENT

CHEMICAL	NOTE
Lead (Pb)	Fasteners machined from free-cutting steels, aluminium alloys, and brass bar.
Cadmium (Cd)	Fasteners manufactured from specific brass alloys.
Chromium (Hexavalent)	Surface treatments, including zinc-plated and yellow-passivated fasteners.
Nickel (Ni)	Fasteners made from alloy steels or brass, and any nickel-plated variations.

LIMITS

Abbreviation	Meaning
MADL	Maximum Allowable Dose Level (Reproductive Toxicants)
NSRL	No Significant Risk Level (Carcinogens)

Safe Harbor Levels:

CHEMICAL	Cancer	Reproductive Toxicity
Lead	NSRL – Oral 15µg/day	MADL 0.5µg/day
Cadmium	NSRL – Inhalation 0.05µg/day	-
Chromium (Hexavalent)	NSRL – Inhalation 0.001 µg/day	MADL – Oral 8.2 µg/day
Nickel (metallic)	Exposure risk metrics remain under active regulatory consideration.	

COMPLIANT WARNING LABELS (AMENDED FOR 2026 RULES)

To maintain Safe Harbour protection under the revised California OEHHA standards, labels must explicitly name the specific chemicals present. Distributors must ensure the following exact text formats are utilised on product packaging destined for the United States:

Standard Warning Format:

CALIFORNIA WARNING: This product can expose you to chemicals including **Lead**, which is known to the State of California to cause cancer and birth defects or other reproductive harm. For more information, go to www.P65Warnings.ca.gov.

Alternative Short-Form Label Format (Permitted on Product Packaging):

CA WARNING: Cancer and Reproductive Harm from **Lead** exposure. See www.P65Warnings.ca.gov.



MATERIALS USED

The table below outlines the permissible ranges of these elements within the standard material specifications used by the Company. Hexavalent chromium is applied purely as a surface passivation chemistry and is not present within the raw base metals themselves.

MATERIAL			% range		
			Cd – Cadmium	Pb – Lead	Ni – Nickel
ALUMINIUM		6082T6	-	-	-
BRASS	CW6142	CZ121	<0.0075	2.50-3.50	<0.30
	CW712R	CZ112	<0.0075	0.20-0.60	<0.20
BRONZE	DEFSTAN 02-833	CA104	-	-	<4.20
	DEFSTAN 02-834	CA107	-	0.00-0.01	0.00-0.10
	Phosphor Bronze	PB102	-	0.00-0.02	0.00-0.20
COPPER		C101	-	-	-
STAINLESS STEEL	1.4305	303s/s	-	-	8.00-10.00
	1.4301	304s/s	-	-	9.00-12.00
	1.4404	316s/s	-	-	10.00-13.00
	1.4541	321s/s	-	-	9.00-12.00
STEEL	230M07Pb	EN1APb	-	0.15-0.35	<0.40
	230M07	EN1A	-	-	<0.40
	212A42	EN8DM	-	-	<0.40
	080M40	EN8	-	-	<0.40
	070M20	EN3B	-	-	<0.40
	605M36T	EN16T	-	-	<0.40
	606M36T	USACUT55	-	-	<0.40
	709M40T	EN19T	-	-	<0.40
	807M40T	EN24T	-	-	<0.40

SUPPLY CHAIN DISCLAIMER

Trojan Special Fasteners Ltd strives to provide premium products that meet or exceed international safety and manufacturing standards. Our procurement processes are continually reviewed to ensure material integrity and compliant supplier chains.

Because the Company does not conduct separate individual exposure testing on finished articles, we inform downstream distributors and end users that listed elements are present within the standard commercial ranges specified above. The ultimate responsibility for evaluating specific site or application exposure remains with the downstream entity. A Proposition 65 warning does not imply that our products violate any safety standards or are inherently harmful; it is a mandatory, proactive legal disclosure required by California state law.