CA Prop 65 Bag Sourcing & COA Checklist

A print-ready summary: the preflight asset pack, the component risk map, the supplier flags to reject, the COA traffic-light review, and the 5-step release gate for California-bound custom bags.

1 Preflight — freeze these assets before sampling

- ☐ BOM, tech pack and trim list
- ☐ Packaging spec and polybag details
- ☐ Sales channels (CA / nationwide / DTC / omnichannel)
- ☐ Age grading — adult vs children's product
- ☐ Supplier declarations, SDS / TDS and prior COAs
- ☐ Physical component swatches cut and labelled by position
- ☐ Exploded diagram with alt-text for each cut sample
- ☐ Chain of custody: PM approves scope, Sourcing secures certs, QA owns sample integrity, Lab & Legal review findings
- ☐ CPSIA review started in parallel for any children's bag

Note: Prop 65 is a warning duty, not a materials ban. Warnings follow California (CA) sales — but nationwide and DTC channels can still expose you to 60-day notices, so document every style.

2 Component risk map — where the chemistry hides

COMPONENT	RISK REASON	TARGET CHEMISTRY
Faux leather / PU panels	Soft-touch plasticizers	Phthalates (DEHP, DINP)
PVC windows / coated trims	Flexible clear plastic	Phthalates
Bright yellow / red pigments	Lead stabilizers for brightness	Lead, heavy metals
Plated hardware (zips, buckles, D-rings, rivets, snaps)	Cheap metal alloys and plating	Lead, heavy metals
Thick logo printing inks	Legacy pigment chemistry	Heavy metals
Packaging / polybags	Low-cost vinyl plasticizers	Phthalates

Rule: identify a component by its physical position on the bag — never by colour alone.

3 Supplier documentation — reject on sight

- ☐ Undated test reports
- ☐ Old "passing" report for a new ink, plating vendor or colour batch

- ☐ Scans with cropped headers
- ☐ Same PDF reused across different substrates
- ☐ Report colourway that does not match your order
- ☐ No coating specification on file
- ☐ No change-control history
- ☐ Declaration not tied to your exact material code

Common trap: a supplier sends a passing report for black fabric when you ordered yellow. Yellow pigments frequently carry lead for brightness — never accept a mismatched-colour report.

4 COA traffic-light review

GREEN — proceed
Documented low risk. Release to production.

YELLOW — review
Chemical detected. Require a formal exposure review.

RED — act
Extreme levels. Reformulate the material or apply a warning.

- ☐ Detection limit (LOQ) mismatched to the claim?
- ☐ Pages missing from the report?
- ☐ Raw metal reported separately from its plating?
- ☐ "ND" noted as if it means the bag is chemical-free?

ND is not zero: a Non-Detect result only means the chemical fell below the lab's reporting limit — it is not proof the material is chemical-free.

5 Exposure vs safe harbor — the decision logic

REFERENCE (OEHHA)	VALUE	WHAT IT MEANS FOR YOU
Lead — oral NSRL	15 µg/day	Below this, no warning is triggered on the oral route
Lead — MADL	0.5 µg/day	Adult-bag dermal contact is often assessed against this

Existence ≠ exposure: a detected chemical does not automatically trigger a warning. Convert the lab concentration to a daily exposure figure and compare it to the safe-harbor level. Worked logic: **concentration** (mg/kg = µg/g) × **daily transferred mass** (g/day, from an exposure model) × **absorption fraction** = daily exposure (µg/day). Always confirm limits and models against the current OEHHA list and your lab's assessment — this page is guidance, not legal advice.

6 The 5-step release gate

- ☐ Classify the product and map components
- ☐ Audit supplier material documentation
- ☐ Create the lab testing plan (test by chemistry, not by whole bag)
- ☐ Evaluate the COA and run the exposure review
- ☐ Execute the gate: release / reformulate & retest / warn / hold
- ☐ Freeze the vendor agreement — material-change notice, report authenticity, indemnity, approval hold points

If a 60-day notice arrives: escalate to counsel before contacting the plaintiff, preserve records, name the chemical (e.g. DEHP / DINP), and pull the original BOM, the lot COAs, supplier POs and warehouse retention samples within 24 hours.
