

## DOCUMENT

# California Proposition 65 Compliance Statement

### OBJECTIVE

The safe Drinking Water and Toxic Enforcement Act, commonly known as Proposition 65 (Prop 65), requires businesses to provide a “clear and reasonable” warning before knowingly and intentionally exposing anyone in California to a [Listed Chemical](#). The list which the California Office of Environmental Health Hazard Assessment (OEHHA) published March 19 2011 contains 1015+ chemicals that are known to the state to cause cancer, birth defects or other reproductive harm.

### SCOPE

Pacific Transformer is a custom manufacture of magnetic components (Transformers and Inductors) who incorporates the materials specified by the customer (purchaser) of said components. Some of the items which are specified by our customers, contain chemicals, or require the use of chemicals in their components processing, which can be found on the List. The purchasing customers for these components produced by Pacific Transformer should be aware of the materials used, and the processes by which components are constructed. In the event of no knowledge, Pacific Transformer will provide the list of items used in the fabrication of our finished goods.

### GENERAL

Inconsequential chemical content is present in the composition of formed metal components, including those found in magnetics, or in their surface treatment such as plating or conformal coating. This content does not exist in a leachable form, in the product(s) or on the product surfaces. It is permanent in the absence of destructive methods or abuse. For these products the presence of the chemical(s) alone does not present a potential risk to a person’s health, and warnings are not indicated directly on the product. The following is an example of chemical content commonly found in magnetic components which may include one or more of the following in all magnetics.

Lead (Pb): found in solder connections or copper wire/terminal plating, & components made of brass.



**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](http://www.P65Warnings.ca.gov)

Nickle (Ni): found in stainless steel, magnetic cores, & is used for copper plating



**WARNING:** This Product can expose you to chemicals including nickel, which is known to the state of California to cause cancer.  
For more information, go to [www.P65Warnings.ca.gov](http://www.P65Warnings.ca.gov)

Epichlorohydrin: found in epoxy resin, used to conformal coat (varnish) magnetics.



**WARNING:** This Product can expose you to chemicals including Epichlorohydrin, 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](http://www.P65Warnings.ca.gov)

Additional chemical’s which are found on the list may be present, or may have been used during the processing of materials within the magnetic components. Individuals are encouraged to visit the California OEHHA website for additional information at <http://oehha.ca.gov/proposition-65>

### ETHICAL DISCLAIMER

The products which are manufactured by Pacific Transformers should be used in a responsible manner, which includes the safe operation and handling. Installation and operation should only be conducted in accordance with all local and jurisdictional laws. It is recommended to wash hands before and after handling any and all electrical equipment. At the intended end of life, magnetic components should be re-purposed by means of responsible scrap metal recycling and done so accordance with local law. The products produced by Pacific Transformer are not intended for consumption and should not be ingested by humans or wildlife. Prolonged exposure to direct physical contact is considered to be hazardous, and it is expected that all transformers be installed into electrical enclosures, chassis or cabinets by which direct physical contact would be prevented, after the point of installation. For all intents and purposes, it should be assumed, inferred and implied that transformers contain chemicals known to the state

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of California to cause cancer, birth defects or reproductive harm, but are within the reportable limit(s) and are excluded from labeling requirements based on the statements made below.

*Mar 25, 2021*

*Safe harbor levels, which include No Significant Risk Levels (NSRLs) for cancer-causing chemicals and Maximum Allowable Dose Levels (MADLs) for chemicals causing reproductive toxicity, have been established for many of the chemicals listed under Proposition 65. Exposure levels and discharges to drinking water sources that are below the safe harbor levels are exempt from the requirements of Proposition 65. In some instances, enforcement actions may have resulted in negotiated exposure levels relative to specific settlement agreements. Please visit the Attorney General's Proposition 65 web site at <https://oag.ca.gov/prop65> for further information about specific enforcement actions.*

### PROCEDURE

Pacific Transformer relies on the purchaser, whom has knowledge of the destination, usage, and operation of the components produced by Pacific Transformer, and should ultimately flow down additional Proposition 65 Warnings, to their end users, customers or assemblers, as they determine to be applicable. For an itemized list of the materials and processes utilized by Pacific Transformer, the customer may request an individual component review. Pacific Transformer will disclose the incorporated materials in the form of a Bill of Materials. Additional review of sub-material components and their processes should be evaluated between the customer and each component(s) source of manufacture, or outsourced to an independent laboratory for additional testing and validation. For these reasons, the evaluation for the potential of risk or hazard as outlined by the requirements of Proposition 65 must be further evaluated by the purchaser or end user who ultimately determine environmental impacts, conditions and safety requirements as well as the protocols for the operators and or technicians handling these items. It would be advisable to wear gloves when handling transformers in addition to utilizing other PPE and safety devices such as lifting equipment.

### COMPLIANCE

Pacific Transformer Corp is committed to sustainable excellence. We take great pride in our comprehensive sustainability platform and are committed to providing the most innovative, durable and sustainable Magnetic Components to the market.

California's Proposition 65 requires products sold in California to have a warning attached to the product or package indicated the possible presence of any of the chemicals listed under Proposition 65. In exercising the enforcement protocols of this regulation lawsuits were filed against companies that sold wire and cable products for alleged violations of the Proposition 65 regulations. The National Electrical Manufacturers Association (NEMA) and several manufacturers of wire and cable negotiated a Consent Judgement settlement with regard to this litigation resolving liability and exempting certain products from the labeling requirements of the Proposition.

Section 7 of the Consent Judgment (Mateel Environmental Justice Foundation v. Sprint Communications et al., and Mateel Environmental Justice Foundation v. Belkin Components et al., San Francisco Superior Court Cases Nos. 312962 and 320342) identifies types of wire and cable products that are exempt from the labelling requirement of Proposition 65 as they are classified as "Infrequently Handled". While these cables may contain concentrations of the restricted substances above the allowable limit their application, weight, or size classifies them as Infrequently Handled.

Pacific Transformer, as one of many companies' party to the above Consent Judgement, claims the exemption to the labeling requirements of Proposition 65 for all of our current products. They are essentially the same in construction and application to those manufactured at the time of the Consent Judgement and meet the requirements of being "Infrequently Handled". While there have been changes to Proposition 65, including the one that went into effect August 2018, to our knowledge the Consent Judgement allows Pacific Transformer to continue to claim exemptions to the labelling requirements.

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9/16/2021 QA Manager