



## **CALIFORNIA PROPOSITION 65 WARNING** and Your Cleanse

**As explained below, the following warning is required for those who follow the cleanse directions in the state of California only:**

“This product contains a chemical known to the State of California to cause cancer and birth defects, or other reproductive harm.”

### **Explanation of the Proposition 65 warning given above:**

As a rule of thumb, raw herbs taken in large quantities, as recommended in Dr. Clark’s cleanses, may require this warning because of the presence of certain listed chemicals, such as lead, that are widely distributed throughout the environment. As a result, many of these chemicals are found in commonly eaten raw and unprocessed foods throughout the food supply, even though these chemicals are not intentionally added to foods or nutritional supplements.

In keeping with Dr. Clark’s protocols, we favor raw and unprocessed herbs over refined, extracted herbs because extracts, as explained by Dr. Clark, are often contaminated with solvents. Please note that every single serving of Dr. Clark Store product complies with Proposition 65 when taken according to the directions on the label. It isn’t until you take the product as described by the cleanse directions that this warning is required.

We analyze **each batch of Dr. Clark Store products for the presence of heavy metals using FDA recommended ICP-MS analytical equipment.** Please keep in mind that the ICP-MS does NOT discriminate between metallic and plant-based heavy metals. We at Dr. Clark Store require additional quality tests over and above GMP regulations. All our finished goods are required to pass Dr. Clark’s biofeedback test for lead, other heavy metals, and pollutants. However, due to government requirements, we cannot rely on the biofeedback test results when complying with regulations. You can find out more about Dr. Clark’s biofeedback testing online on our “Difference” page.

So that you can better understand this warning and what it means for consumers like you, let’s take a look at what Proposition 65 is and why it may not be producing its intended effect.

### **What is Proposition 65?**

Proposition 65 was enacted by a voter ballot initiative, not the California Legislature. This law requires companies to provide clear warnings about the presence of any one of over 800 chemicals, including chemicals that occur naturally in the environment. California has a formal process for adding these chemicals to the Proposition 65 list, including through reports based on animal studies. In many instances, these animal studies involve extremely high dosages of chemicals. There are many

substances that require the California Proposition 65 warning at levels that are far more stringent than federal action limits. A Proposition 65 warning does not automatically mean that the product is unsafe. **Although its intentions were good, Proposition 65 has brought about unforeseen consequences. For instance, it requires a warning on supplements - especially raw, unrefined herbal supplements - when food escapes the warning requirements of Proposition 65.**

**Why is there a Proposition 65 Warning on my cleanses and not my food?**

There are two reasons for this. The food and candy companies are large and can afford to litigate. When you buy food, there are no directions attached to the container your food comes in directing you to eat a certain amount per day. This gets the food companies off the hook. Without those directions the trial lawyers looking to make an easy buck on Proposition 65 lose their ability to litigate.

Even “chemicals” that we think of as toxic, such as elements like lead and cadmium, are naturally occurring in the Earth’s soil and are present in everyday foods like butter. Although lead is naturally occurring, its presence has increased in soil due to human activities. Lead is found in most organic, raw, and unrefined foods you buy in the health food store. Proposition 65 requires a warning on products that expose consumers to as little as 0.5 micrograms per day. As explained below, this is an extremely small amount. Proposition 65 doesn’t discriminate between plant-based minerals and metallic minerals, and we believe it is not a significant health concern when applied to most, if not all, supplements taken according to recommended dosages, especially when these supplements are taken for a limited period of time.

Consider the lead content (Table 1) in a single serving of commonly consumed natural foods, as calculated from the Food and Drug Administration (FDA).

**Table 1. Lead content in a 4 oz. (1/2 cup) serving.**

Food, 4 oz	Mean, mcg	Max, mcg	Food, 4 oz	Mean, mcg	Max, mcg
 Graham Crackers	0.45	2.27	 Spinach, Fresh/Frozen, Boiled	0.45	2.04
 Butter, Regular (Salted)	0.23	3.52	 Collards, Fresh/Frozen, Boiled	0.23	2.84
 Grapefruit, Raw	0.11	2.38	 Shrimp, Boiled	1.36	20.41
 Avocado, Raw	0.11	3.40	 Dill Cucumber Pickles	1.02	5.56

**Should I be concerned about my dietary supplements?**

According to the California Office of Environmental Health Hazard Assessment, which is the government agency that oversees Proposition 65, “A Proposition 65 warning does not necessarily mean a product is in violation of any product safety standards or requirements.” Are your dietary supplements likely to put you at risk? **No.** That being said, you should always consider your total exposure from *all* sources.

The FDA created an extremely cautious provisional total tolerable intake level for lead for certain individuals and age groups (Table 2). You can see that even these more stringent federal “safe” levels are much higher than what might be found in dietary supplements or in common foods. Even if you follow the Dr. Clark cleanse directions you will not exceed FDA limits:

**Table 2. FDA’s Provisional Total Tolerable Intake Level for Lead (mcg/day) \***

For Whom	Amount Thought to Cause Health	FDA’s Provisional Total
Children < 6	60	6
Children ≥ 7	150	15
Pregnant Women	250	25
Adult	750	75

*\*FDA has stated that it is rethinking its position on these levels but has yet to amend them.*

### **FDA vs Proposition 65**

In comparison to FDA, Proposition 65 requires a warning at 0.5 mcg per day, a level 15,000% lower than the FDA limits for adults.

### **Proposition 65 vs The Rest of the World**

This regulation applies only to supplements sold in the state of California. To our knowledge, no other state or country has enacted such stringent requirements.

### **How can I be assured that DR. CLARK STORE supplements are pure?**

As part of our compliance with Current Good Manufacturing Practice (GMP) regulations and quality assurance procedures, we regularly test all DR. CLARK STORE formulas for heavy metals with an ICP-MS. In addition, all of DR. CLARK STORE supplements are tested for:

- The presence of microorganisms. Every formula must meet USP specifications to be released.
- Identity. Every raw material is tested for identity using FTIR, HPTLC and HPLC.
- Finished product potencies. Each ingredient must meet the label claim displayed on the supplement facts box.
- We also test per Dr. Hulda Clark’s biofeedback methods for all the contaminants she was concerned about.

### **Important Points to Takeaway:**

- DR.CLARK STORE formulas follow the strictest possible practices for purity—from procurement of raw materials to production of finished products.
- DR. CLARK STORE formulas meet the purity criteria of FDA and Proposition 65 when taken per label directions.
- The Proposition 65 warning applies only to cleanses taken according to the directions.

If you need additional information, please contact DR. CLARK STORE Customer Service at [Service@DrClarkStore.com](mailto:Service@DrClarkStore.com) We value our customers and wish to keep them informed.