



MW Industries

04/26/2023

To: Valued Customers
From: MW-Components
Subject: California Proposition 65 – Revised Listing as of 21 April 2023 Annual Listing Update

Dear Valued Customer,

MW-Components are a leading provider of highly engineered springs, specialty fasteners, machined parts, and other precision components. MW-Components serves more than 45,000 customers in more than 35 countries. It's more than 100,000 products are sold through a combination of direct sales, catalogs, and distributors to original equipment manufacturers and aftermarket customers in aerospace, medical, electronics, energy, agriculture, construction, and other sectors.

To the best of our knowledge the products, produced out of nickel, cobalt, titanium, and stainless-steel alloys do not present a risk to human health and the environment under California's Proposition 65 in a form that would require labeling per the updated regulation guidelines and listings effective 04/21/2023.

Nickel (Metallic) and Nickel compounds are on the Prop 65 Substance List. However, Nickel contained in alloy form (which MW Components using in the manufacturing process (300 series, 200 series and Inconel alloys) are shown as being distinct and thus exempted from Prop 65 (see below).

"SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (Proposition 65)
NOTICE TO INTERESTED PARTIES May 7, 2004
CHEMICAL LISTED EFFECTIVE May 7, 2004 AS KNOWN TO THE STATE OF CALIFORNIA TO
CAUSE CANCER.
For the purposes of clarification, OEHHA notes that nickel alloys are
distinct from nickel compounds and are not included in the Proposition 65
listing of *nickel compounds*."

In addition, Nickel coatings which we view as covered by Nickel and Nickel compounds are covered by the following statement:

"As indicated in Title 22 of the California Code of Regulations Section 12707(b)(5), for purposes of Proposition 65, nickel and nickel compounds present no significant risk of cancer by the route of ingestion."

Another substance that can be found on the Prop 65 list which might lead to some questions is "Cobalt Metal Powder". However, as mentioned above with Nickel, the cobalt found in Inconel X750 and a couple of other materials is in the alloy form, so distinct from "Cobalt Metal Powder". It is our view that the products MW Components manufactures fall under occupational exposure warnings, not consumer or environmental warnings (as we do not know the extent of exposure for end use products). Thus, we believe that an SDS (Safety Data Sheet) will provide sufficient information for downstream manufactures to determine the proper labeling for their end use products.

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MW-Components