



Gavin Newsom, Governor
Yana Garcia, Secretary for Environmental Protection
Kristina Thayer, Ph.D., Director

December 23, 2025

Re: Proposition 65 – Information Letter
Exposures to Vinyl Acetate from Consumer Products

Dear Interested Parties:

Effective January 3, 2025, the Carcinogen Identification Committee (CIC) added vinyl acetate to the Proposition 65 list as a carcinogen. Because the warning requirement for significant exposures to vinyl acetate will take effect on January 3, 2026, this letter provides guidance regarding that chemical.

Vinyl acetate is mainly used in the production of polymers and copolymers, for instance polyvinyl acetate (PVA), polyvinyl alcohol, polyvinyl acetals, ethylene-vinyl acetate (EVA) copolymers, polyvinyl chloride-acetate copolymers, and vinyl acetate-vinyl laurate copolymers.

Businesses evaluating vinyl acetate exposures from their products, as well as anyone investigating a possible failure to warn for a significant exposure to that chemical, should keep in mind that the various polymers and copolymers described above were not added to the Proposition 65 list. The CIC listed only the chemical vinyl acetate, CAS no. 108-05-4. This monomer is uncommon in consumer products, although residual unreacted monomer *may* be present in some products made with vinyl acetate polymers and copolymers.

Before filing a Proposition 65 lawsuit, a private party must give notice of the alleged violation; this is commonly called a 60-day Notice. The private party must also serve a Certificate of Merit certifying that a person with “relevant and appropriate experience or expertise.... believes there is a reasonable and meritorious case for the private action,” and must provide the Attorney General with “factual information sufficient to establish the basis of” that certification. (Health and Safety Code §25249.7(d)(1).) The fact that a consumer product contains a vinyl acetate-based polymer or copolymer is not, by itself, factual information sufficient to establish a potential exposure to vinyl acetate.

The ideal test for this chemical would reflect the amount of vinyl acetate *released* from the product during use or at other times when people could be exposed; tests which

reflect the vinyl acetate *present* in the product at such times would also be useful. A test should not, however, reflect the amount of vinyl acetate obtained from dissolving vinyl acetate-containing polymers in a manner which would not otherwise occur during the foreseeable use, purchase, storage, maintenance, or repair of the product.

Sincerely,

A handwritten signature in cursive script that reads "Kris Thayer".

Kristina Thayer, Ph.D.
Director