



# INTERNATIONAL CRYSTAL FEDERATION

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TO: Companies Selling Lead Crystal Products in the State of California  
FROM: The International Crystal Federation  
DATE: January 16, 2026  
RE: **Proposition 65 Warnings for Crystal Items Sold in California**

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**This memorandum is being sent to remind you that the sale in California of virtually all “Leaded Crystal Products” must be accompanied by Proposition 65 warnings. *Proposition 65 bounty hunter claims continue against retailers and other sellers of Leaded Crystal Products who have been alleged not to be in full compliance with Proposition 65 warning requirements so your attention to the matters discussed below may prove particularly important for your company now and in the years ahead.***<sup>1</sup>

The Proposition 65 warning requirements for Leaded Crystal Products apply to all **retail stores** located in California; to all **“mail order” sales** made to California residents (whether by mail, catalogue, telephone or via the Internet); to **restaurants** in California that serve food or beverages in lead crystal; and to California **wineries** that sell lead crystal or use it for giveaways or tastings. In addition, **distributors** of lead crystal must pass on information about these Proposition 65 warning requirements to their customers.<sup>2</sup> A copy of the International Crystal Federation’s recommended Proposition 65 warning sign for retail sales in California of lead crystal is attached to this memorandum. More specialized warning language for “mail order” (including internet-based) sales and warning signs for restaurants and wineries are available upon further request.<sup>3</sup>

**Failure to provide Proposition 65 warnings for lead crystal could subject your company to enforcement litigation (including citizen’s suits), monetary penalties, and attorney’s fees. For questions about Proposition 65 warnings for Leaded Crystal Products, please contact Tim Maher, Executive Director of the International Crystal Federation, at (970) 904-1263 or [timothyfrancismaher@gmail.com](mailto:timothyfrancismaher@gmail.com).**

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1 “Leaded Crystal Products” requiring Proposition 65 warnings were previously defined by the San Francisco Superior Court as *all* crystal products containing *any* lead. The California Attorney General’s Office maintains a position that even crystal/crystalline products made with no intentionally added lead could require a Proposition 65 warning if exposures to lead are detectable at a level above 2 parts per billion. Bounty hunter cases may be allowed to proceed accordingly.

2 In addition to the warnings required for the storage/consumption of food and beverages, the International Crystal Federation (“ICF”) recommends providing Proposition 65 warnings about potential exposures to lead from handling Leaded Crystal Products (including crystal gift and decorative products).

3 Although changes to the Proposition 65 safe harbor warning regulations became effective for consumer products manufactured after August 30, 2018, and updated safe harbor short form warning regulations were published in December 2024, those changes do not impact the International Crystal Federation’s longstanding Proposition 65 warning program for Leaded Crystal Products under a related grandfathering provision that remains in the regulations. Therefore, while we are reminding you of the need to continue to implement the ICF’s Proposition 65 warning program, the materials needed to do so have not changed.

## SUMMARY OF PROPOSITION 65 WARNING REQUIREMENTS FOR RETAILERS OF CRYSTAL ITEMS

If you are a retailer of any kind (no matter where you are based) and maintain retail outlets in California in which Leaded Crystal Products are sold, you must provide a warning by posting one or more warning signs in each California store as further described below.

### Location of warning signs

- Any retailer may satisfy the requirements of the Proposition 65 warning program for crystal in any one of the following three ways. You may either:
  - Post 4-inch by 6-inch signs on each shelf where leaded crystal items are displayed, or
  - Post 8-inch by 10-inch signs at each location (such as in the aisle) where leaded crystal items are displayed (the signs may be free-standing, placed on a wall, hung, or displayed in any manner if a potential purchaser would be likely to see the signs), or
  - Post 4-inch by 6-inch (or, at your option, 8-inch by 10-inch) signs at, on, or adjacent to each checkout counter, sales register, cash stand, or cash wrap in the tableware department. If you do not have such separate facilities dedicated to a tableware department, and your store is less than 7,500 square feet, then you must place the warning signs at each checkout counter, sales register, cash stand, or cash wrap in the store.

These options are summarized in chart form below:

	<i>Type of store</i>		
<i>Options for placement of Proposition 65 warning signs for lead crystal</i>	<b>Large department store (&gt; 7500 sq. ft.) with separate checkout for tableware dept.</b>	<b>Large store (&gt; 7500 sq. ft.) without separate checkout for tableware dept.</b>	<b>Small store (&lt; 7500 sq. ft.) without separate checkout for tableware dept.</b>
<b>4x6 on display shelves</b>	Yes	Yes	Yes
<b>8x10 near display</b>	Yes	Yes	Yes
<b>4x6 at registers (optional: 8x10)</b>	Yes – put signs at <i>all</i> registers in the dept.	No – signs at registers <i>not</i> allowed	Yes, but required at <i>all</i> registers in store

## **Content of warning signs**

Different versions of Proposition 65 warning signs for Leaded Crystal Products have been approved by the California Attorney General's office and courts since the early 1990s. While you may use any of the approved signs, the International Crystal Federation recommends that you post the attached version of the sign, which, in addition to referencing food and beverage storage and consumption, also warns about potential exposures to lead from handling crystal.

Also, please note that if you sell Baccarat decanters, falcons, stoppered pitchers, or mustard or jam pots, you will need to use a special version of the warning sign that contains an asterisked footnote exempting these items from the warning message. Please contact the International Crystal Federation if you need these or copies of any other Proposition 65 warning signs for Leaded Crystal Products.

## **REQUIREMENTS FOR PROPOSITION 65 WARNINGS CONCERNING OTHER CALIFORNIA SALES OR USES OF LEADED CRYSTAL PRODUCTS**

The following is a summary of requirements that apply to mail order and internet sales of Leaded Crystal Products to California residents, as well as requirements for California restaurants or wineries that use or sell lead crystal.

- **Requirements for Mail Order, Catalog, and Internet Sales to California Residents**

If you sell Leaded Crystal Products to residents of California by mail order, telephone, catalog, or the Internet – you must provide a Proposition 65 lead crystal warning to any customer who is a resident of California. The warning may appear in the catalog, on an ordering website, or in a package insert or label, but it also must meet highly specific requirements for each of these modes. (More detailed information concerning these requirements is available upon further request to the International Crystal Federation.)

- **Requirements for Restaurants**

If you operate a restaurant or other eating establishment in the State of California and serve food or beverages in lead crystal tableware, you must provide a warning to your patrons by posting a special lead crystal Proposition 65 warning sign for restaurants where it will be seen by your customers before they consume food. (These signs are available from the International Crystal Federation on request.)

- **Requirements for Wineries**

If you are a California winery that sells or uses lead crystal tableware products on your premises, you must post a special Proposition 65 lead crystal warning sign for wineries on or near the cash register(s) or service counter(s) where lead crystal tableware articles may be purchased by consumers, and in or at the entrance to any area where wine is poured in lead crystal glasses for tasting.

## **DISTRIBUTORS WHOSE CUSTOMERS MAY DO BUSINESS IN CALIFORNIA**

If you are a distributor of lead crystal tableware or giftware to retailers, mail order/Internet sellers, restaurants, or wineries, you must pass on ICF's Proposition 65 Leaded Crystal Warning program information to all your customers who may do business in California. You must also request that they implement the Proposition 65 warning program for Leaded Crystal Products as described above. Failure to do so may subject you and your customers to enforcement lawsuits, penalties, and attorneys' fees.

**PROP 65**

# **WARNING**

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**Consuming foods or beverages that have been kept or served in leaded crystal products or handling products made of leaded crystal will expose you to lead — a chemical known to the State of California to cause birth defects or other reproductive harm.**