



Via Certified Mail
And email: plaubies@ekaterratea.com
December 30, 2024
Pierre Laubies, CEO
Lipton Tea
121 River St
Hoboken, NJ 07030

NOTICE OF INTENT TO FILE SUIT UNDER PROPOSITION 65 AND CALIFORNIA
CONSUMER LEGAL REMEDIES ACT

Dear Mr. Laubies,

I am a regular Lipton and Tazo consumer. I was shocked to learn that Tazo and Lipton use plastic tea bags. A report published in the *International Journal of Surgery* (March 2024) found that plastic tea bags pose a serious health risk because of microplastic pollution and other contaminants. Your teas contain chemicals that are known to cause health risks including epichlorohydrin, polypropylene, Di-n-butyl phthalate, Bisphenol A and other harmful chemicals. Most of these chemicals are on the California Proposition 65 List of carcinogens.

I am giving you sixty-days-notice pursuant to The Safe Drinking Water and Toxic Enforcement Act of 1986 (Health and Safety Code section 25249.5 et seq.), also known as Proposition 65.

Plastic tea bags also harm the environment by entering into streams, lakes and oceans. Fish and other wildlife ingest these teabags. Humans eat fish and other animals containing plastic from your teabags. Your plastic tea bags harm human life and the environment. Further, your failure to notify consumers on your packaging that your products contain plastic constitutes an unfair and deceptive trade practice in violation of Section 17200 of the California Business and Professions Code.

I propose a settlement as follows:

1. Lipton and Tazo will agree to either package its tea in non-plastic bags or place a proposition 65 notice on its packaging;
2. Lipton and Tazo will compensate the California Association for Recycling All Trash with \$240,000 to monitor compliance for one year.

I look forward to working with you to improve the environment and make your products safe to drink.

Sincerely yours,

Joel D. Joseph
CEO