

## NOTICE OF VIOLATION

### California Safe Drinking Water and Toxic Enforcement Act

#### Bisphenol A in Canned Corned Beef

March 17, 2026

This Notice of Violation is provided to you pursuant to and in compliance with California Health and Safety Code Section 25249.7(d).

- For general information regarding the California Safe Drinking Water and Toxic Enforcement Act, see the attached summary provided by the California EPA (copies not provided to public enforcement agencies).
- This Notice is provided by the Center for Environmental Health (“CEH”), 2201 Broadway, Suite 508, Oakland, CA 94612, (510) 655-3900. CEH is a nonprofit corporation dedicated to protecting the environment, improving human health, and supporting environmentally sound practices. Shakoora Azimi-Gaylon is the Senior Director of the Toxic Exposures and Pollution Prevention program and a responsible individual within CEH.

#### Description of Violation:

- Violators: The names and addresses of the violators are identified on the attached Exhibit 1.
- Time Period of Exposure: The violations have been occurring since at least March 17, 2023, and are continuing to this day.
- Provision of Proposition 65: This Notice covers the “warning provision” of Proposition 65, which is found at California Health and Safety Code Section 25249.6.
- Chemical(s) Involved: The name of the listed chemical involved in these violations is bisphenol A (“BPA”). The violators identified in Exhibit 1 expose individuals to BPA when individuals consume the canned corned beef products identified in this Notice.
- Type of Product: The specific type of product causing these violations is canned corned beef products. A non-exclusive example of this type of product is identified on the attached Exhibit 1.
- Description of Exposure: This Notice addresses consumer exposures to BPA. Consumption of the canned corned beef products subject to this Notice results in human exposures to BPA. BPA is found in the canned corned beef products. The primary route of exposure for the violations is direct ingestion when consumers eat the products. These exposures occur in homes, workplaces, and everywhere else throughout California where the canned corned beef products

are consumed. No clear and reasonable warning is provided with these products regarding the presence of BPA in the products.

**Resolution of Noticed Claims:**

Based on the allegations set forth in this Notice, CEH intends to file a citizen enforcement lawsuit against the alleged violators unless such violators agree in a binding written instrument to: (1) recall products already sold; (2) provide clear and reasonable warnings for products sold in the future or reformulate such products to eliminate the BPA exposures; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249.7(b). Violators interested in resolving this dispute short of litigation should contact CEH through its counsel identified below. It should be noted that CEH cannot: (1) finalize any settlement until after the 60-day notice period has expired; nor (2) speak for the Attorney General or any District or City Attorney who received CEH's 60-day Notice. Therefore, while reaching an agreement with CEH will resolve CEH's claims, such agreement may not satisfy the public prosecutors.

**Preservation of Relevant Evidence:**

This Notice also serves as a demand that the alleged violators preserve and maintain all relevant evidence, including all electronic documents and data, pending resolution of this matter. Such relevant evidence includes but is not limited to all documents relating to the presence or potential presence of BPA in canned corned beef products; purchase and sales information for such products; efforts to comply with Proposition 65 with respect to such products; communications with any person relating to the presence or potential presence of BPA in such products; and representative exemplars of each lot of each variety of any such products sold by the alleged violator since March 17, 2025 through the date of any trial of the claims alleged in this Notice.

Please direct any inquiries regarding this Notice to CEH's counsel, Meredyth Mellow, at Lexington Law Group, LLP, 503 Divisadero Street, San Francisco, CA 94117, (415) 913-7800, [mmerrow@lexlawgroup.com](mailto:mmerrow@lexlawgroup.com).

**CERTIFICATE OF MERIT**  
**Health & Safety Code § 25249.7(d)**

I, Meredyth Merrow, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the party identified in the notice has violated Health & Safety Code § 25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney with the Lexington Law Group, LLP, and I represent the noticing party, the Center for Environmental Health.
3. Members of my firm and I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposures to the listed chemical that is the subject of the action.
4. Based on the information obtained through those consultations, and on other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that “reasonable and meritorious case for the private action” means that the information provides a credible basis that all elements of the plaintiff’s case can be established and the information did not prove that the alleged violators will be able to establish any of the affirmative defenses set forth in the statute.
5. The copy of the Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health & Safety Code § 25249.7(h)(2), i.e. (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

March 17, 2026



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Meredyth Merrow  
Attorney for CENTER FOR  
ENVIRONMENTAL HEALTH

**EXHIBIT 1**  
**March 17, 2026 Notice of Violation**  
**Bisphenol A (BPA) in Canned Corned Beef**

Names and Addresses of Responsible Parties	Non-Exclusive Examples of the Products	UPC or Further Description
<p><b>Kraft Heinz Foods Company (LLC)</b> 1 Ppg Place, Suite 3400, Pittsburgh, PA 15222</p> <p><b>H.J. Heinz Company Australia Limited</b> 40 Bowman Road Wagga Wagga, New South Wales, 2650 Australia</p> <p><b>Milky Way International Trading Corp.</b> 15203 Shoemaker Ave, Norwalk, CA 90650</p> <p><b>Panamex Pacific, Inc.</b> 1401 21st St, #12754, Sacramento, CA 95811</p>	<p>Ox &amp; Palm Corned Beef with Natural Juices</p>	<p>UPC: 8-42552-00011-0; Net Wt 11.5 oz (326g); Packed By: HJ Heinz Company Australia Limited. 2 Southbank Blvd. Southbank, Victoria 3006, Australia; Best Before 2030-03- 27</p>
<p><b>Conagra Brands, Inc.</b> 222 Merchandise Mart Plaza, Chicago, IL 60654</p>	<p>Libby's Corned Beef</p>	<p>UPC: 0-39000-08104-7; Net Wt 12 oz (340g); Dist. by Conagra Brands, P.O Box 3534 Chicago, IL 60654; Best Before 2028-04- 19</p>
<p><b>The Kroger Co.</b> 1014 Vine Street Cincinnati, OH 45202</p>	<p>Kroger Corned Beef</p>	<p>UPC: 0-11110-12517-0; Net Wt 12 oz (340 g); Dist. by The Kroger Co. Cincinnati, Ohio 45202; Best Before June 2030</p>

Names and Addresses of Responsible Parties	Non-Exclusive Examples of the Products	UPC or Further Description
<p><b>Global Market Foods LLC</b> 5400 W. 35<sup>th</sup> Street Cicero, IL 60804</p> <p><b>Ziyad Brothers Importing LLC</b> 5400 W. 35<sup>th</sup> Street, Cicero, IL 60804</p>	<p>Ziyad Brand Premium Corned Beef</p>	<p>UPC: 0-74265-00014-3; Net Wt 12 oz (340 g); Dist by ZB Importing, LLC Cicero, IL 60804; Best Before 2030-02-12</p>
<p><b>Kradjian Importing Company, Inc</b> 5018 San Fernando Road, Glendale, CA 91204</p> <p><b>Targeter (UK) Limited</b> 168 Shoreditch High Street, 2nd Floor, London, UK</p>	<p>Targeter Brand Corned Beef with Natural Juices</p>	<p>UPC: 8-13691-00002-6; Net Wt 12 oz (340 g); Imported By Kradjian Importing Company Co. Inc, Glendale CA; Packed for Targeter (UK) LTD; Best Before 2029-04-25</p>
<p><b>Hormel Foods Corporation</b> 1010 Dale St N St Paul, MN 55117-5603</p> <p><b>San Miguel Food and Beverage, Inc.</b> No. 100 E. Rodriguez Jr. Avenue (C5 Road), Barangay Ugong, Pasig City 1604, Metro Manila, Philippines</p> <p><b>San Miguel Corporation</b> 40 San Miguel Avenue, Mandaluyong, Metro Manila, 1550</p>	<p>San Miguel Pure Foods Corned Beef with Juices</p>	<p>UPC: 8-42552-00084-4; Net Wt: 12 oz (340 g); Manufactured for and Distributed by The Purefoods-Hormel Company Inc. Best Before 2029-08-26</p>
<p><b>Martin Purefoods Corporation</b> 1713 W 2<sup>nd</sup> St, Pomona, CA 91766</p>	<p>Martin Purefoods Chunky Corned Beef with Natural Juices</p>	<p>UPC: 8-11884-03005-8; Net Wt 11.5 oz (326 g); Manufactured for and distributed by: Martin Purefoods, Corp., Pomona CA 91766; Best Before 2028-05-16</p>

<b>Names and Addresses of Responsible Parties</b>	<b>Non-Exclusive Examples of the Products</b>	<b>UPC or Further Description</b>
<p><b>Kraft Heinz Foods Company (LLC)</b> 1 Ppg Place, Suite 3400, Pittsburgh, PA 15222</p> <p><b>Heinz Wattie's Limited</b> 513 King Street North, Hastings 4122, New Zealand</p>	<p>Crown Brand Corned Beef with Natural Juices</p>	<p>UPC: 8-42552-00004-2; Net Wt 15 oz (425 g); Packed for Heinz Wattie's Limited; Best Before 2026-11-30</p>

1 **PROOF OF SERVICE**

2 I, Morgan Margulies, declare:

3 I am a citizen of the United States and employed in the County of San Francisco, State of  
4 California. I am over the age of eighteen (18) years and not a party to this action. My business  
5 address is 503 Divisadero Street, San Francisco, CA 94117 and my email address is  
mmargulies@lexlawgroup.com.

6 On March 17, 2026, I served the following document(s) on all interested parties in this  
7 action by placing a true copy thereof in the manner and at the addresses indicated below:

8 **NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND  
TOXIC ENFORCEMENT ACT;**

9 **CERTIFICATE OF MERIT;** and

10 **THE SAFE DRINKING AND TOXIC ENFORCEMENT ACT OF 1986**  
11 **(PROPOSITION 65): A SUMMARY** (only sent to those on service list marked with an  
asterisk).

12  **BY MAIL:** I am readily familiar with the firm's practice for collecting and processing mail  
13 with the United States Postal Service ("USPS"). Under that practice, mail would be deposited  
14 with USPS that same day with postage thereon fully prepaid at San Francisco, California in the  
ordinary course of business. On this date, I placed sealed envelopes containing the above  
mentioned documents for collection and mailing following my firm's ordinary business practices.

15 *Please see attached service list.*

16  **BY ELECTRONIC UPLOAD:** I transmitted a PDF version of the document(s) listed above,  
17 as well as a Confidential Supporting Certificate of Merit, to the Office of the Attorney General of  
California via the Proposition 65 60-Day Notice Search website at [https://oag.ca.gov/prop65/60-](https://oag.ca.gov/prop65/60-day-notice-search)  
18 [day-notice-search](https://oag.ca.gov/prop65/60-day-notice-search).

19  **BY ELECTRONIC MAIL:** I transmitted a PDF version of the document(s) listed above via  
20 email to the email address(es) indicated on the attached service list [or noted above] before 5 p.m.  
on the date executed.

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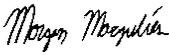
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13  
14 I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct.

15 Executed on March 17, 2026 at San Francisco, California.

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Morgan Margulies

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## SERVICE LIST

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