



The American College of  
Obstetricians and Gynecologists  
WOMEN'S HEALTH CARE PHYSICIANS



March 21, 2025

The Honorable Caroline Menjivar, Chair  
Senate Committee on Health  
1021 O Street, Room 3310  
Sacramento, CA 95814

**RE: SB 646 (Weber Pierson) – Sponsor**

Dear Chair Menjivar:

The Environmental Working Group (EWG), Unleaded Kids, and the American College of Obstetricians and Gynecologists District IX (ACOG) is pleased to sponsor SB 646 (Weber Pierson), which will protect maternal and fetal health by requiring the testing and public reporting of heavy metals in prenatal vitamins sold or manufactured in California.

Prenatal vitamins play a critical role in supporting healthy pregnancies, providing essential nutrients that help lower the risk of birth defects, low birth weight, and other complications. However, recent studies have raised significant concerns about contamination of these supplements with toxic elements, including lead, arsenic, cadmium, and mercury—substances known to pose serious health risks, especially to pregnant individuals and developing fetuses.

A Government Accountability Office (GAO) study found that lead, a toxic metal with no known safe level of exposure, was present in half of the prenatal vitamin samples tested. Additional independent studies have documented contamination levels exceeding California's Proposition 65 thresholds. Despite these alarming findings, there are currently no federal or state regulations requiring the testing and disclosure of heavy metals in prenatal vitamins.

SB 646 addresses this critical gap by requiring manufacturers to test a representative sample from each production lot for arsenic, cadmium, lead, and mercury. The bill further mandates public reporting of test results to the California Department of Public Health and requires manufacturers to disclose toxic element levels on their websites starting in 2027. Consumers may access this information via a QR code on product labels, linking to a webpage with FDA guidance on the health risks associated with these heavy metals.

California has long led the nation in protecting public health through transparency and accountability measures, including AB 899 (2023), which requires toxic element testing in baby food. SB 646 builds on that progress by empowering pregnant individuals with vital information to choose safe and reliable prenatal supplements, free from harmful contaminants.

For all these reasons, EWG, Unleaded Kids, and ACOG are pleased to sponsor SB 646 and urge your “aye” vote. Thank you for your attention.

Sincerely,



Scott Faber  
Environmental Working Group



Tom Neltner  
Unleaded Kids



Ryan Spencer  
American College of Obstetricians and Gynecologists, District IX