

# Get The Scoop on Lead in Baby Food & Prenatal Vitamins

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# Let's Dish on Lead Contamination

For 1 to 6 year olds:



**50%**  
food

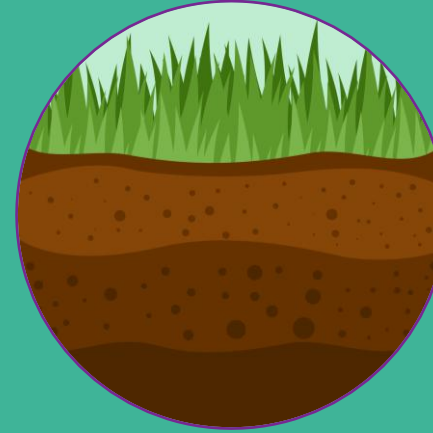


**40%**  
soil/dust



**10%**  
water

For 0 to 6 month olds:



**50%**  
soil/dust



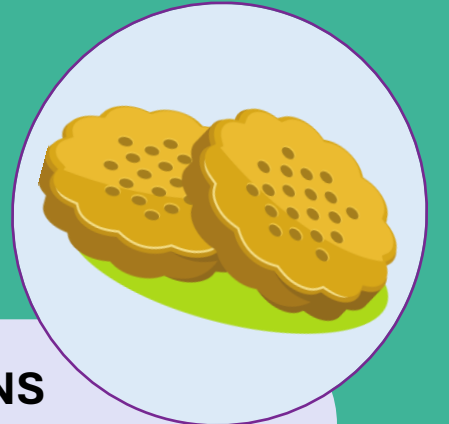
**40%**  
water



**10%**  
food

# FDA's Action Levels for Baby Food

- FDA does not require testing nor disclosure for contaminants in food or dietary supplements
- Arsenic, cadmium, lead, and mercury have been in focus since 2017 and the impetus for the Closer to Zero initiative in 2021
- Sets action levels for top 5-10% of products on the market
- Action level guidance proposed in January 2025 for lead:
  - 20 ppb for dry infant cereals
  - 20 ppb for single-ingredient root vegetables
  - 10 ppb for other baby foods (with exceptions)
- European Union enforceable maximum levels of 20 ppb of lead in “baby food and processed cereal-based food for infants and young children”



## EXEMPTIONS

- Snack foods, including grain-based or freeze-dried snacks such as arrowroot cookies, puffs, rusks, and teething biscuits
- Beverages, including toddler drinks
- Infant formula

# What Are We Eating?

## Lead

- **What is it?**

- A heavy metal



- **What is in?**

- Many foods, especially root vegetables (sweet potatoes, cassava, carrots, etc.)



- **What does it hurt?**

- Kidneys
- Heart
- Lungs
- Brain
- Reproductive system



# What Are The Rules?

## Lead

### U.S. FDA Regulations

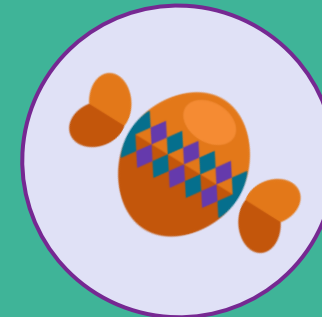
- 5 ppb in bottled water



### U.S. FDA Guidance

- Action Levels for Lead in Processed Food Intended for Babies and Young Children (2025)
- Unavoidable Contaminants in Food for Human Consumption and Food Packaging Material—Ornamental and decorative ceramicware (2016)
- Lead in Candy Likely To Be Consumed Frequently by Small Children: Recommended Maximum Level and Enforcement Policy (2006)

The FDA issues guidance for industry to describe the agency's current thinking on a regulatory issue. ... Unlike regulations, guidance is not legally binding for the FDA or industry. —FDA

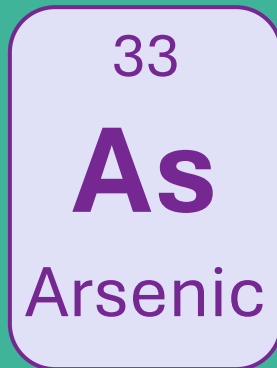


# What Are We Eating?

## Arsenic

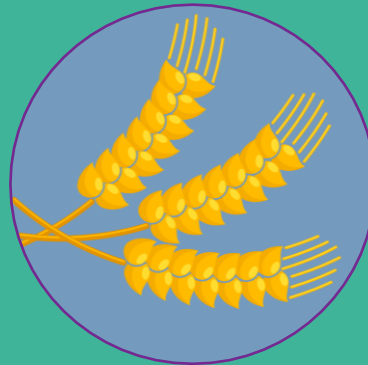
### What is it?

- A light metalloid, organic & inorganic



### What is in?

- Rice (rice cereal)



### What does it hurt?

- Brain
- Skin (cancer)



# What Are The Rules?

## Arsenic

### U.S. FDA/EPA

- 10 ppb in drinking & bottled water

### U.S. FDA Guidance

- Action level for inorganic arsenic in apple juice (2023) — 11 ppb
- Action level for inorganic arsenic in rice cereals for infants (2020) — 100 ppb
- Action levels for inorganic arsenic foods Intended for Babies and Young Children anticipated by December 2025

*“There is growing evidence from human and animal studies that exposure to inorganic arsenic during prenatal development could increase the risk of adverse health effects. These adverse effects include impaired development in utero and neurodevelopmental toxicity in infants and young children [ATSDR 2016].” —CDC*

# What Are We Eating?

## Cadmium

### What is it?

- A heavy metal often found in phosphate fertilizer



### What is in?

- Leafy greens (spinach)
- Grains (rice, wheat, oats)



### What does it hurt?

- Kidneys
- Reproductive system



# What Are The Rules?

## Cadmium

### U.S. FDA/EPA Regulations

- 5 ppb in drinking water

### U.S. FDA Guidance

- Action level for cadmium in foods intended for babies and young children anticipated in December 2025

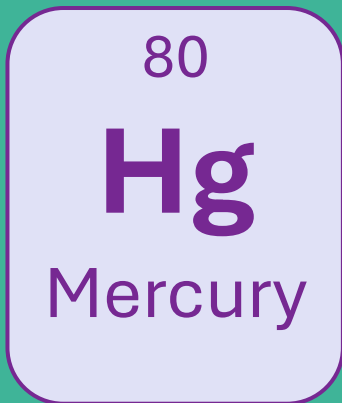
*“The potential adverse health effects from consuming foods contaminated with cadmium vary depending on the level of cadmium in the food; age of the consumer; length, amount, and frequency of exposure to cadmium in the food; and other exposures to different sources of cadmium and to beneficial nutrients.” —FDA*

# What Are We Eating?

## Mercury

### What is it?

- A heavy metal



### What is in?

- Fish
- Shellfish



### What does it hurt?

- Brain
  - Neurological & psychological



# What Are The Rules?

## Mercury

### U.S. FDA/EPA Regulations

- 2 ppb in bottled water and drinking water

### U.S. FDA Guidance

- Action Levels for Poisonous or Deleterious Substances in Human Food and Animal Feed (2000)

*“Because mercury is widespread in the environment, and because it is not possible to remove mercury from seafood, or to grow or produce certain foods completely free of mercury, the FDA’s goal is to limit consumer exposure to mercury, with a focus on protecting the very young, through developing regulations, setting action levels, and issuing advice to consumers.” —FDA*

# What Does the Research Say?

## Lead in Youth

- FDA sets Interim Reference Level (IRL) so that the contribution from food is 10% of CDC's Blood Lead Reference Value
  - It is interim because FDA acknowledges there is no safe level of exposure to lead
- **2.6 million** infants and young children exceed FDA's IRL of 2.2 mcg of lead per day (8 mcg/d for adults).



### NOTE

Infants = 0-11 months, excluding those fed human milk

Young children = 1-6 years old

# What Does the Research Say?

## Cadmium in Youth

- **12 million** children exceed FDA's toxicological reference value for cadmium (0.21 to 0.36 mcg of cadmium per kg of body weight per day).
  - Using the midpoint of the range for simplicity, for young children aged 1 to 6, their mean exposure was 51% greater than the TRV and the 90th percentile was 150% greater. Infants not fed human milk had lower dietary exposure, but the 90th percentile was still 37% higher than the TRV.



### NOTE

Infants = 0-11 months, excluding those fed human milk

Young children = 1-6 years old

# Consumer Reports Investigations

Brian Ronholm  
Director of Food Policy  
Consumer Reports



# Dark Chocolate – December 2022

- 28 dark chocolate bars
  - 5 products rated safer choice by Consumer Reports
    - Mast
    - Taza Chocolate
    - Ghirardelli (2)
    - Valrhona
  - 5 products high in both lead and cadmium
  - 10 products high in lead
  - 8 products high in cadmium



# Cassava – May 2025

- Flagged by Lead-Safe Mama
- Gluten-free alternative
- Root vegetable also used to make tapioca
- 27 products evaluated for lead and cadmium by Consumer Reports
- 8 rated as better choices
- 12 rated as okay to eat occasionally
- 7 rates as products to avoid





**“There is no excuse for having arsenic in baby food or formula. Absolutely none. The industry should be bending over backward to be certain it’s not there.”**

DAVID CARPENTER, MD

Director of the Institute for Health and the Environment at the State University of New York at Albany

## Infant Formula – March 2025

- 41 types of powdered formula
- Inorganic arsenic
  - Abbott Nutrition’s EleCare Hypoallergenic at 19.7 ppb
  - Abbott Nutrition’s Similac Alimentum at 15.1 ppb
- Lead ranged from 1.2 ppb to 4.2 ppb

SOURCE: <https://www.consumerreports.org/babies-kids/baby-formula/baby-formula-contaminants-test-results-a7140095293/>



# Consumer Reports and Unleaded Kids Investigation into Baby Food Transparency





# California AB-899 (Oct. 2023)

- Baby food = represented or purported to be specifically for babies and young children less than two years of age, excluding infant formula
- Applies to toxic elements: arsenic, cadmium, lead and mercury



# California AB-899 (Jan. 2024)

- January 2024, manufacturers must:
  - Analyze a representative sample of each batch of their baby food products sold in California at least once a month at laboratory accredited for ISO/IEC 17025:2017, as good as FDA EAM 4.7 method, demonstrated proficiency to 6 ppb
  - Provide results to California Department of Health on request





# California AB-899 (Jan. 2025)

- Manufacturers must:
  - Make results publicly available by posting results on website
  - Provide notice and QR codes on label after FDA finalizes action level



# Transparency Ratings of 39 Baby Food Brands

- Evaluated 39 brand of baby foods with products broad portfolio of products or specialty
- Top score for 16 brands because consumer can easily find all test results for products on the brand's website.

Brainiac Foods

Cerebelly

Earth's Best

Fresh Bellies

Gerber

Kendamil

Lil' Gourmets

Mission MightyMe

Nestum/Cerelac

Nurture Life

Once Upon a Farm

Plum Organics

Pumpkin Tree

Square Baby

Stonyfield Organic

White Leaf Provisions

To Be Published  
August 6, 2025





# Example of a Top Scorer

| cerebelly  |                  |                            |                                                                                                           |
|------------|------------------|----------------------------|-----------------------------------------------------------------------------------------------------------|
| Lot Number | Test Report Date | Product Name               | Lead                                                                                                      |
|            |                  |                            |  Prop 65 level: 0.5 mc |
| Purees     |                  |                            |                                                                                                           |
| 24236      | 09/04/24         | White Bean Pumpkin Apple   | non-detect<br>< 6 ppb                                                                                     |
| 24234      | 08/27/24         | Broccoli Pear              | non-detect<br>< 6 ppb                                                                                     |
| 24213      | 08/12/24         | Carrot Chickpea            | non-detect<br>< 6 ppb                                                                                     |
| 24209      | 08/01/24         | Spinach Apple Sweet Potato | non-detect<br>< 6 ppb                                                                                     |
| 06294X34   | 07/08/24         | White Bean Pumpkin Apple   | non-detect<br>< 6 ppb                                                                                     |
| 24218      | 08/12/24         | Sweet Potato               | non-detect                                                                                                |





## Example of a Low Scorer

- Lowest score for 4 brands because no public webpage found to access test results.

Loco Bebe

Love Child Organics

Parent's Choice (Walmart)

Piko Provisions

**CR**  
Consumer  
Reports



# Transparency Ratings, Part I

16 brands rated second lowest because consumer must locate and enter a lot code, best-by date, or batch number to access test results.

Amara

Babylife Organics

Baby Mum-Mum

Beech-Nut

Else Nutrition

Good & Gather Baby (Target)

Kekoa Foods

Little Bellies

Little Journey (Aldi)

Little Spoon

O Organics (Albertsons)

Puffworks

Ready Set Food

Sprout Organics

Yumi

Simple Truth (Kroger)





# Ease of Use, Part I

An example of some of the barriers to access



# Transparency Ratings, Part II

3 brands had information publicly available but with some barriers that kept them from top score.

- A consumer must locate and enter a 12-digit UPC number to access a product's test results.
- A consumer must click on best-by dates to find products and only then access test results.

[Holle](#)

[Serenity Kids](#)

[Happy Baby Organics](#)



# Ease of Use, Part II

An example of slight barriers to access.



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## Next Up

- Scoring baby foods for better or worse than average levels of arsenic, cadmium, lead, and mercury
- Evaluating dietary supplements intended for babies



# Lead & Cadmium in Prenatal Multivitamins



# What Does the Research Say?

## Pregnancy Vitamins

- **Over 80%** of 156 liquid, liquid gel, powder, soft gel, tablet, capsule, caplet, chewable, and gummy prenatal vitamins on store shelves exceed 0.5 micrograms of lead per serving
  - Median concentration of lead: 79 ppb
  - **Highest had 900 ppb of lead**
- **Nearly 75%** of 156 had cadmium



### NOTE

Study authors note that FDA sets a limit of 100 ppb of lead in candy.



# California's SB 646 Bill – Passage soon?

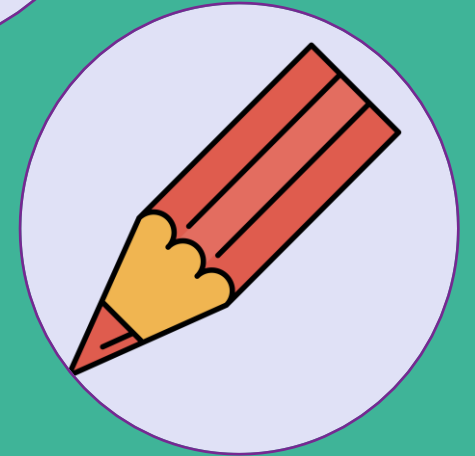
- Introduced by Sen. Dr. Akilah Weber Pierson, an obstetrician/gynecologist
- Modeled on California AB 899 – Testing and disclosure
- Unanimously passed Senate and its committees
- Unanimously passed two House committees
- Working through final details



# Closing the Gap

## Ongoing Efforts

- Your communities have some coverage but gaps remain.
- Efforts make the difference (Seattle, New York City, Healthy Babies Bright Futures, Consumer Reports, Environmental Defense Fund)
- YOU have an important role in providing education about the research and consumer transparency laws.



# Questions?

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Unleaded Kids Blog – [www.unleadedkids.org/blogs](http://www.unleadedkids.org/blogs)

