

February 25, 2021

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The Honorable Raja Krishnamoorthi, Chairman
Subcommittee on Economic and Consumer Policy
Committee on Oversight and Reform
United States House of Representatives
Washington, D.C. 20515-6216

Re: Response to Letter Dated February 11, 2021

Dear Chairman Krishnamoorthi:

On behalf of Campbell Soup Company (“Campbell”), I write in response to the Subcommittee’s February 11, 2021 letter requesting additional documents relating to the testing of baby foods. Campbell strongly supports the goal of ensuring that the foods we feed our babies are safe and nourishing. Campbell has been working to make safe and wholesome food available to our consumers for over 150 years, and the Plum Organics brand—which Campbell acquired in 2013—is committed to its mission of serving babies the very best food from the first bite.

As noted in our original response and as recently confirmed by the U.S. Food and Drug Administration (“FDA”)¹, the federal government has not yet provided guidance to baby food manufacturers on acceptable levels of heavy metals—which occur naturally in soil and water and therefore will often be present in certain foods, including baby food. In the absence of a federal standard, Campbell applies criteria derived from California’s Proposition 65, the European Union, and the World Health Organization—along with general guidance from the FDA on lead not specific to baby foods—in its testing of Plum Organics’ products. Our testing showed each product was well within levels deemed acceptable by independent authorities. Per your request, Campbell is providing additional detail concerning the baby food testing information that it provided to the Subcommittee on December 11, 2019. These additional documents include the testing results in parts per billion for each product on the spreadsheet we provided at that time and the explanation of the criteria Campbell applied in its testing, which was also provided at

¹ FDA Response to Questions About Levels of Toxic Elements in Baby Food, Following Congressional Report, Feb. 16, 2021 *available at* <https://www.fda.gov/food/cfsan-constituent-updates/fda-response-questions-about-levels-toxic-elements-baby-food-following-congressional-report>.

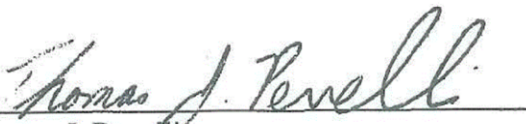
February 25, 2021

Page 2

that time. Campbell is also providing additional data for baby food testing that has occurred since our December 11, 2019 response.

Campbell is committed to working cooperatively toward science-based standards that will help minimize heavy metals in our products. We also reiterate our support of FDA's development, based on scientific consensus, of clear and specific guidance on this important subject to ensure that the foods we feed our babies are safe and nourishing.

Sincerely,



Thomas J. Perrelli

Baby Food Product Testing Results (2017-2019)

We are confident in the safety and quality of our products. Heavy metals are present throughout the environment, including soil and water. Plum Organics is committed to minimizing heavy metals in our products and supports FDA's development, based on scientific consensus, of clear and specific guidance for baby food manufacturers on appropriate levels of heavy metals in food. As our testing below shows, each product is well within levels deemed acceptable by independent authorities.

Reference Criteria				FDA 100 ppb inorganic arsenic limit for rice cereal and/or EU 300 ppb for rice crackers **	Prop 65 MAX limit (10 µg/day) **	WHO/JECFA MAX limit 8.0 µg/day (per 10 kg child)	FDA MAX limit (6 µg/day) ***			
Product Name	Testing Date	Serving size in grams	Total ppb Arsenic (As)	ppb Arsenic (inorganic)	Arsenic (Inorganic) µg/serving	ppb Cadmium (Cd)	Cd µg/serving	ppb Lead	Lead µg/serving	ppb Mercury ****
Plum Organics® Stage 2 Apple & Carrot, 4oz	11/1/2017	113	<4	<100ppb/not speciated	<100ppb/not speciated	8	0.90	<4	*	<4
Plum Organics® Stage 2 Banana & Pumpkin, 4oz	11/1/2017	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Mighty 4® Blends Strawberry Banana, Greek Yogurt, Kale, Oat & Amaranth, 4oz	11/1/2017	113	<4	<100ppb/not speciated	<100ppb/not speciated	5	0.57	<4	*	<4
Plum Organics® Mighty Snack Bars® Strawberry, 4.02oz (Pack of 6)	10/29/2017	19	15	<10	*	8	0.15	29	0.55	<4
Plum Organics® Mighty Nut Butter Bar™ Almond Butter (Pack of 5)	8/29/2018	19	17	<100ppb/not speciated	<100ppb/not speciated	14	0.27	6	0.11	<4
Plum Organics® Mighty Nut Butter Bar™ Almond Butter (Pack of 5)	8/29/2018	19	15	<100ppb/not speciated	<100ppb/not speciated	15	0.29	9	0.17	<4
Plum Organics® Mighty Nut Butter Bar™ Peanut Butter (Pack of 5)	8/29/2018	19	11	<100ppb/not speciated	<100ppb/not speciated	25	0.48	11	0.21	<4
Plum Organics® Mighty Nut Butter Bar™ Peanut Butter (Pack of 5)	8/29/2018	19	13	<100ppb/not speciated	<100ppb/not speciated	20	0.38	4	0.08	<4
Plum Organics® Stage 2 Peach, Banana & Apricot, 4oz	11/1/2017	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pear & Mango, 4oz	11/1/2017	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pear, Spinach & Pea, 4oz	11/1/2017	113	4	<100ppb/not speciated	<100ppb/not speciated	10	1.13	<4	*	<4
Plum Organics® Stage 2 Apple, Blackberry & Oat Baby Bowls, 3.6 oz.	5/23/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.50	<4
Plum Organics® Stage 2 Apple, Blackberry & Oat Baby Bowls, 3.6 oz.	5/23/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Apple, Blackberry & Oat Baby Bowls, 3.6 oz.	6/27/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 2 Apple, Spinach & Avocado Baby Bowls, 3.6 oz.	5/17/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	15	1.49	<4	*	<4
Plum Organics® Stage 2 Apple, Spinach & Avocado Baby Bowls, 3.6 oz.	5/17/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	15	1.49	4	0.40	<4
Plum Organics® Stage 2 Apple, Spinach & Avocado Baby Bowls, 3.6 oz.	5/17/2018	99	7	<100ppb/not speciated	<100ppb/not speciated	<4	*	9	0.89	<4
Plum Organics® Stage 2 Beet, Apple, Strawberry & Chia Baby Bowls, 3.6 oz.	5/17/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Beet, Apple, Strawberry & Chia Baby Bowls, 3.6 oz.	5/17/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.59	<4
Plum Organics® Stage 2 Beet, Apple, Strawberry & Chia Baby Bowls, 3.6 oz.	5/17/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.59	<4
Plum Organics® Stage 2 Mango, Carrot & Turmeric Baby Bowls, 3.6 oz.	5/23/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	5	0.50	4	0.40	<4
Plum Organics® Stage 2 Mango, Carrot & Turmeric Baby Bowls, 3.6 oz.	5/23/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	9	0.89	7	0.69	<4
Plum Organics® Stage 2 Mango, Carrot & Turmeric Baby Bowls, 3.6 oz.	6/27/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 1 Mango & Quinoa Baby Bowls, 3.6 oz.	5/17/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	6	0.59	<4	*	<4
Plum Organics® Stage 1 Mango & Quinoa Baby Bowls, 3.6 oz.	5/21/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	6	0.59	<4	*	<4
Plum Organics® Stage 1 Mango & Quinoa Baby Bowls, 3.6 oz.	5/21/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	6	0.59	<4	*	<4
Plum Organics® Stage 1 Pear & Prune Baby Bowls, 3.6 oz.	5/17/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.69	<4
Plum Organics® Stage 1 Pear & Prune Baby Bowls, 3.6 oz.	5/17/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 1 Pear & Prune Baby Bowls, 3.6 oz.	5/17/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.59	<4
Plum Organics® Stage 2 Pear, Sweet Potato & Red Bell Pepper Baby Bowls, 3.6 oz.	5/17/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 2 Pear, Sweet Potato & Red Bell Pepper Baby Bowls, 3.6 oz.	5/17/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 1 Pear, Blueberry & Avocado Baby Bowls, 3.6 oz.	8/29/2018	102	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.41	<4
Plum Organics® Stage 2 Pumpkin, Banana, Papaya & Cardamom Baby Bowls, 3.6 oz.	5/21/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pumpkin, Banana, Papaya & Cardamom Baby Bowls, 3.6 oz.	5/21/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.50	<4
Plum Organics® Stage 2 Pumpkin, Banana, Papaya & Cardamom Baby Bowls, 3.6 oz.	5/21/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	20	1.98	<4
Plum Organics® Baby Banana & Pumpkin 128ML	10/29/2017	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.45	<4

* < LoQ (Limit of Quantitation)

** Where total ppb is less than the more stringent FDA standard of 100ppb, we do not speciate because even if entirely inorganic, it is below the relevant standard.

*** FDA decreased level from 6 µg/kg to 3 µg/kg after the submission of our letter in December 2019 (see published report Feb. 2020). Only one of our products—which was discontinued in 2017—would have exceeded the new threshold by .07µg. That product met the FDA standard in place at the time it was produced, tested, and when we submitted our original response to the Subcommittee. <https://www.sciencedirect.com/science/article/pii/S0273230019302806?via3Ihuh>

**** There is no regulatory criteria for mercury for these products. Our criteria are a) that we use no high-risk ingredients, like shellfish; and b) that the testing shows that mercury levels are low in these products. All but two of our tested products showed mercury levels under 4 ppb, which is the limit of quantitation. Of the two products that showed quantifiable levels of mercury, one showed mercury of 5 ppb and one of 6 ppb. Under EU regulations, acceptable limits of methyl mercury in certain seafoods range from 500 ppb to 1000 ppb. WHO/JECFA has a mercury exposure limit of 2.3 µg/day for a 10 kg child. A concentration of 5 ppb and 6 ppb for mercury in product would be 0.05 and 0.06 µg for a 10 kg child, significantly below the WHO/JECFA exposure limit.

Baby Food Product Testing Results (2017-2019)

Reference Criteria					FDA 100 ppb inorganic arsenic limit for rice cereal and/or EU 300 ppb for rice crackers **	Prop 65 MAX limit (10 µg/day) **	WHO/JECFA MAX limit 8.0 µg/day (per 10 kg child)	FDA MAX limit (6 µg/day) ***		
Product Name	Testing Date	Serving size in grams	Total ppb Arsenic (As)	ppb Arsenic (inorganic)	Arsenic (inorganic) µg/serving	ppb Cadmium (Cd)	Cd µg/serving	ppb Lead	Lead µg/serving	ppb Mercury ****
Plum Organics® Baby Pear BLUE PUR CAR 6PK 768ML	10/29/2017	113	6	<100ppb/not speciated	<100ppb/not speciated	<4	*	12	1.36	<4
Plum Organics® Baby Sweet Potato Apple & Corn 6PK 768ML	10/29/2017	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 DHA Apple, Banana, Blueberry, Sunflower Seed Butter, 3.5oz	10/29/2017	99	<4	<100ppb/not speciated	<100ppb/not speciated	11	1.09	11	1.09	<4
Plum Organics® Grow Well Muscle 3.5OZ	10/29/2017	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	29	2.87	<4
Plum Organics® Grow Well Tummy 3.5OZ	10/29/2017	99	7	<100ppb/not speciated	<100ppb/not speciated	<4	*	31	3.07	<4
Plum Organics® Jammy Sammy® Apple Cinnamon & Oatmeal, 5.1oz (Pack of 5)	10/28/2017	29	7	<100ppb/not speciated	<100ppb/not speciated	6	0.17	6	0.17	<4
Plum Organics® Jammy Sammy® Blueberry & Oatmeal, 5.1oz (Pack of 5)	7/12/2018	29	7	<100ppb/not speciated	<100ppb/not speciated	14	0.41	13	0.38	<4
Plum Organics® Jammy Sammy® Blueberry & Oatmeal, 5.1oz (Pack of 5)	7/18/2018	29	7	<100ppb/not speciated	<100ppb/not speciated	17	0.49	5	0.15	<4
Plum Organics® Jammy Sammy® Peanut Butter & Grape, 5.1oz (Pack of 5)	10/29/2017	29	10	<10	*	9	0.26	12	0.35	<4
Plum Organics® Jammy Sammy® Peanut Butter & Strawberry, 5.1oz (Pack of 5)	7/20/2018	29	14	<100ppb/not speciated	<100ppb/not speciated	7	0.20	17	0.49	<4
Plum Organics® Little Teethers Banana with Pumpkin, 3.17oz (Pack of 6)	9/25/2019	5	34	<100ppb/not speciated	<100ppb/not speciated	8	0.04	<4	*	<4
Plum Organics® Mighty Snack Bars® Blueberry, 4.02oz (Pack of 6)	10/29/2017	19	15	<10	*	12	0.23	14	0.27	<4
Plum Organics® Mighty Snack Bars® Pumpkin Banana, 4.02oz (Pack of 6)	7/20/2018	19	14	<100ppb/not speciated	<100ppb/not speciated	9	0.17	13	0.25	<4
Plum Organics® Mighty Snack Bars® Strawberry, 4.02oz (Pack of 6)	10/29/2017	19	7	<10	*	8	0.15	10	0.19	<4
Plum Organics® Mighty 4® Blends Banana, Blueberry, Sweet Potato, Carrot, Greek Yogurt & Millet, 4oz	7/16/2018	113	6	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Mighty 4® Blends Apple, Blackberry, Purple Carrot, Greek Yogurt & Oat, 4oz	6/27/2018	113	10	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.79	<4
Plum Organics® Mighty 4® Blends Apple, Blackberry, Purple Carrot, Greek Yogurt & Oat, 4oz	6/27/2018	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.45	<4
Plum Organics® Mighty 4® Blends Apple, Blackberry, Purple Carrot, Greek Yogurt & Oat, 4oz	6/27/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	4	0.45	<4	*	<4
Plum Organics® Mighty 4® Blends Apple, Blackberry, Purple Carrot, Greek Yogurt & Oat, 4oz	7/17/2018	113	6	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.45	<4
Plum Organics® Mighty 4® Blends Guava, Banana, Black Bean, Carrot, Oat, 4oz	7/6/2018	113	7	<100ppb/not speciated	<100ppb/not speciated	<4	*	16	1.81	<4
Plum Organics® Mighty 4® Blends Mango & Pineapple, White Bean, Butternut Squash, Oats , 3.75 oz	7/16/2018	106	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.74	<4
Plum Organics® Mighty 4® Blends Banana, Peach, Pumpkin, Carrot, Greek Yogurt & Oat, 4oz	7/6/2018	113	5	<100ppb/not speciated	<100ppb/not speciated	4	0.45	13	1.47	<4
Plum Organics® Mighty 4® Blends Banana, Peach, Pumpkin, Carrot, Greek Yogurt & Oat, 4oz	7/16/2018	113	5	<100ppb/not speciated	<100ppb/not speciated	4	0.45	13	1.47	<4
Plum Organics® Mighty 4® Blends Pear, Cherry, Blackberry, Strawberry, Black Bean, Spinach & Oat, 4oz	8/15/2018	113	8	<100ppb/not speciated	<100ppb/not speciated	4	0.45	7	0.79	<4
Plum Organics® Mighty 4® Blends Pear, Cherry, Blackberry, Strawberry, Black Bean, Spinach & Oat, 4oz	8/15/2018	113	5	<100ppb/not speciated	<100ppb/not speciated	4	0.45	<4	*	<4
Plum Organics® Mighty 4® Blends Banana, Kiwi, Spinach, Greek Yogurt & Barley, 4oz	7/6/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	18	2.03	5	0.57	<4
Plum Organics® Mighty 4® Blends Banana, Kiwi, Spinach, Greek Yogurt & Barley, 4oz	7/20/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	6	0.68	8	0.90	<4
Plum Organics® Mighty 4® Blends Strawberry Banana, Greek Yogurt, Kale, Oat & Amaranth, 4oz	10/29/2017	113	4	<100ppb/not speciated	<100ppb/not speciated	18	2.03	5	0.57	<4
Plum Organics® Mighty 4® Blends Sweet Potato, Banana & Passion Fruit, Greek Yogurt, Oat, 3.75 oz	7/6/2018	106	<4	<100ppb/not speciated	<100ppb/not speciated	5	0.53	7	0.74	<4
Plum Organics® Mighty Morning® Banana, Blueberry, Oat & Quinoa, 3.17oz	10/28/2017	90	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	8	0.72	<4
Plum Organics® Mighty Morning® Bar Apple Cinnamon, 4.02oz (Pack of 5)	7/12/2018	19	11	<100ppb/not speciated	<100ppb/not speciated	43	0.82	22	0.42	<4
Plum Organics® Mighty Morning® Bar Blueberry Lemon, 4.02oz (Pack of 5)	7/20/2018	19	13	<100ppb/not speciated	<100ppb/not speciated	31	0.59	11	0.21	<4
Plum Organics® Mighty Morning® Bar Blueberry Lemon, 4.02oz (Pack of 5)	9/25/2019	19	17	<100ppb/not speciated	<100ppb/not speciated	29	0.55	73	1.39	<4
Plum Organics® Mighty Protein & Fiber Banana, White Bean, Strawberry & Chia, 4 oz	8/29/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.57	<4
Plum Organics® Mighty Protein & Fiber Mango, Banana, White Bean, Sunflower Seed Butter & Chia, 4 oz	8/29/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	15	1.70	4	0.45	<4
Plum Organics® Mighty Protein & Fiber Pear, White Bean, Blueberry Date & Chia, 4 oz	8/29/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.45	<4
Plum Organics® Mighty Sticks Apple Carrot 2.1OZ	10/28/2017	10	61	41	0.41	14	0.14	43	0.43	<4
Plum Organics® Mighty Sticks Berry Beet 2.1OZ	10/29/2017	10	60	39	0.39	13	0.13	17	0.17	6

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*** FDA decreased level from 6 µg/kg to 3 µg/kg after the submission of our letter in December 2019 (see published report Feb. 2020). Only one of our products—which was discontinued in 2017—would have exceeded the new threshold by .07µg. That product met the FDA standard in place at the time it was produced, tested, and when we submitted our original response to the Subcommittee. <https://www.sciencedirect.com/science/article/pii/S0273230019302806?via3Dihub>

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Product Name	Testing Date	Serving size in grams	Total ppb Arsenic (As)	ppb Arsenic (inorganic)	Arsenic (inorganic) µg/serving	ppb Cadmium (Cd)	Cd µg/serving	ppb Lead	Lead µg/serving	ppb Mercury ****
Plum Organics® Smoothie Mashups® Apple & Banana, 3.17oz (Pack of 4)	7/20/2018	90	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Mashups Strawberry Beet 3.17OZ	7/20/2018	90	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	17	1.53	<4
Plum Organics® Mashups Blueberry Carrot 3.17OZ	7/12/2018	90	6	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Mashups Carrot Mango 3.17OZ	7/20/2018	90	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	14	1.26	<4
Plum Organics® Smoothie Mashups® Peach & Banana, 3.17oz (Pack of 4)	7/12/2018	90	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.54	<4
Plum Organics® Mashups Strawberry Blackberry Blueberry 3.17OZ	7/12/2018	90	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.63	<4
Plum Organics® Mashups Strawberry Blackberry Blueberry 3.17OZ	7/18/2018	90	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Mashups Strawberry Banana 3.17OZ	7/16/2018	90	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.45	<4
Plum Organics® Mashups Strawberry Banana 3.17OZ	7/20/2018	90	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Mighty Veggie® Carrot, Pear, Pomegranate & Oats, 4oz	7/17/2018	113	7	<100ppb/not speciated	<100ppb/not speciated	6	0.68	9	1.02	<4
Plum Organics® Mighty Veggie® Spinach, Grape, Apple & Amaranth, 4oz	7/16/2018	113	8	<100ppb/not speciated	<100ppb/not speciated	26	2.94	16	1.81	<4
Plum Organics® Mighty Veggie® Sweet Potato, Apple, Banana & Carrot, 3.75 oz	7/6/2018	106	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	9	0.95	<4
Plum Organics® Mighty Veggie® Zucchini, Apple, Watermelon & Barley, 4oz	7/16/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.57	<4
Plum Organics® Stage 1 Just® Fruit Mangos, 3.5oz	5/1/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	4	0.40	7	0.69	<4
Plum Organics® Stage 1 Just® Fruit Mangos, 3.5oz	5/2/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	5	0.50	<4	*	<4
Plum Organics® Stage 1 Just® Fruit Mangos, 3.5oz	5/14/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 1 Just® Fruit Mangos, 3.5oz	5/24/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	4	0.40	4	0.40	<4
Plum Organics® Stage 1 Just® Fruit Peaches, 3.5oz	5/1/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 1 Just® Fruit Peaches, 3.5oz	5/2/2018	99	6	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 1 Just® Fruit Peaches, 3.5oz	5/15/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 1 Just® Fruit Peaches, 3.5oz	9/25/2019	99	7	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 1 Just® Fruit Prunes, 3.5oz	9/25/2019	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 1 Just® Fruit Prunes, 3.5oz	7/17/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.59	<4
Plum Organics® Stage 1 Just® Sweet Potato, 3oz	5/15/2018	85	9	<100ppb/not speciated	<100ppb/not speciated	<4	*	8	0.68	<4
Plum Organics® Stage 1 Just® Sweet Potato, 3oz	5/15/2018	85	6	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.34	<4
Plum Organics® Stage 1 Just® Sweet Potato, 3oz	6/27/2018	85	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.43	<4
Plum Organics® Stage 1 Just® Sweet Potato, 3oz	9/25/2019	85	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	21	1.79	<4
Plum Organics® Stage 2 Apple, Blackberry, Coconut Cream & Oat, 3.5 oz	5/10/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.69	<4
Plum Organics® Stage 2 Apple, Blackberry, Coconut Cream & Oat, 3.5 oz	6/27/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 2 Apple, Butternut Squash & Granola, 3.5oz	3/15/2019	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Apple, Raisin & Quinoa, 3.5oz	9/25/2019	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Apple, Spinach & Avocado, 3.5 oz	5/15/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	15	1.49	7	0.69	<4
Plum Organics® Stage 2 Apple, Spinach & Avocado, 3.5 oz	5/23/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	18	1.78	<4	*	<4
Plum Organics® Stage 2 Apple, Spinach & Avocado, 3.5 oz	5/24/2018	99	6	<100ppb/not speciated	<100ppb/not speciated	17	1.68	4	0.40	<4
Plum Organics® Stage 2 Apple & Broccoli, 4oz	5/1/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Apple & Broccoli, 4oz	5/2/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Apple & Broccoli, 4oz	5/7/2018	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.45	<4
Plum Organics® Stage 2 Apple & Carrot, 4oz	10/29/2017	113	<4	<100ppb/not speciated	<100ppb/not speciated	7	0.79	6	0.68	<4
Plum Organics® Stage 2 Peach, Banana & Apricot, 4oz	10/29/2017	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4

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Baby Food Product Testing Results (2017-2019)

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Product Name	Testing Date	Serving size in grams	Total ppb Arsenic (As)	ppb Arsenic (inorganic)	Arsenic (inorganic) µg/serving	ppb Cadmium (Cd)	Cd µg/serving	ppb Lead	Lead µg/serving	ppb Mercury ****
Plum Organics® Stage 2 Pear & Mango, 4oz	10/29/2017	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pear, Spinach & Pea, 4oz	10/29/2017	113	6	<100ppb/not speciated	<100ppb/not speciated	11	1.24	10	1.13	<4
Plum Organics® Stage 2 Apple, Cauliflower & Leek, 3.5oz	10/29/2017	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.59	<4
Plum Organics® Stage 2 Eat Your Colors® Cherry, Purple Carrot, Blackberry & Millet, 3.5oz	5/14/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.50	<4
Plum Organics® Stage 2 Eat Your Colors® Cherry, Purple Carrot, Blackberry & Millet, 3.5oz	5/14/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.69	<4
Plum Organics® Stage 2 Mango, Yellow Zucchini, Corn & Turmeric, 3.5oz	5/1/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 2 Mango, Yellow Zucchini, Corn & Turmeric, 3.5oz	5/2/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Mango, Yellow Zucchini, Corn & Turmeric, 3.5oz	5/7/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Mango, Yellow Zucchini, Corn & Turmeric, 3.5oz	5/16/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 2 Peach, Pumpkin, Carrot & Cinnamon, 3.5oz	5/17/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Peach, Pumpkin, Carrot & Cinnamon, 3.5oz	5/17/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Peach, Pumpkin, Carrot & Cinnamon, 3.5oz	5/25/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pea, Kiwi, Pear & Avocado, 3.5oz	5/1/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.59	<4
Plum Organics® Stage 2 Pea, Kiwi, Pear & Avocado, 3.5oz	5/2/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.50	<4
Plum Organics® Stage 2 Pea, Kiwi, Pear & Avocado, 3.5oz	6/27/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.59	<4
Plum Organics® Stage 2 Eat Your Colors® Strawberry, Apple, Rhubarb & Oats, 3.5oz	5/16/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	7	0.69	11	1.09	<4
Plum Organics® Stage 2 Eat Your Colors® Strawberry, Apple, Rhubarb & Oats, 3.5oz	5/24/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	8	0.79	5	0.50	<4
Plum Organics® Stage 2 Eat Your Colors® Strawberry, Apple, Rhubarb & Oats, 3.5oz	5/24/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	8	0.79	6	0.59	<4
Plum Organics® Stage 2 Apple, Raisin & Quinoa, 3.5oz	10/28/2017	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	15	1.49	<4
Plum Organics® Stage 2 Apple, Plum, Berry & Barley, 3.5oz	5/15/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Mango, Sweet Potato, Apple & Millet, 3.5oz	5/15/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Mango, Sweet Potato, Apple & Millet, 3.5oz	6/27/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Banana, Zucchini & Amaranth, 3.5oz	5/23/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Banana, Zucchini & Amaranth, 3.5oz	5/23/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pear, Green Bean & Greek Yogurt, 3.5oz	5/1/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.69	<4
Plum Organics® Stage 2 Pear, Green Bean & Greek Yogurt, 3.5oz	5/2/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pear, Green Bean & Greek Yogurt, 3.5oz	5/15/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pear, Green Bean & Greek Yogurt, 3.5oz	5/24/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 2 Pear, Green Bean & Greek Yogurt, 3.5oz	5/24/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Apple, Raspberry, Spinach & Greek Yogurt, 3.5oz	5/1/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	4	0.40	11	1.09	<4
Plum Organics® Stage 2 Apple, Raspberry, Spinach & Greek Yogurt, 3.5oz	5/2/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.69	<4
Plum Organics® Stage 2 Apple, Raspberry, Spinach & Greek Yogurt, 3.5oz	5/7/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	5	0.50	7	0.69	<4
Plum Organics® Stage 2 Guava, Pear & Pumpkin, 3.5 oz	5/1/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Guava, Pear & Pumpkin, 3.5 oz	5/2/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 2 Guava, Pear & Pumpkin, 3.5 oz	5/15/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.50	<4
Plum Organics® Stage 2 Guava, Pear & Pumpkin, 3.5 oz	5/24/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Hearty Veggie Carrots, Beans, Spinach & Tomato, 3.5oz	5/23/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	6	0.59	<4	*	<4
Plum Organics® Stage 2 Kale, Corn, Carrot & Tomato, 3.5oz	5/15/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	4	0.40	18	1.78	<4
Plum Organics® Stage 2 Kale, Corn, Carrot & Tomato, 3.5oz	5/15/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	5	0.50	9	0.89	<4

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Product Name	Testing Date	Serving size in grams	Total ppb Arsenic (As)	ppb Arsenic (inorganic)	Arsenic (inorganic) µg/serving	ppb Cadmium (Cd)	Cd µg/serving	ppb Lead	Lead µg/serving	ppb Mercury ****
Plum Organics® Stage 2 Kale, Corn, Carrot & Tomato, 3.5oz	5/25/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	4	0.40	4	0.40	<4
Plum Organics® Stage 2 Pumpkin, Spinach, Chickpea & Broccoli, 3.5oz	5/23/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	5	0.50	4	0.40	<4
Plum Organics® Stage 2 Pumpkin, Spinach, Chickpea & Broccoli, 3.5oz	5/23/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	6	0.59	6	0.59	<4
Plum Organics® Stage 2 Pumpkin, Spinach, Chickpea & Broccoli, 3.5oz	5/30/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	33	3.27	<4	*	<4
Plum Organics® Stage 2 Mango, Carrot & Coconut Cream, 3.5 oz	5/16/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	4	0.40	<4	*	<4
Plum Organics® Stage 2 Mango, Carrot & Coconut Cream, 3.5 oz	5/25/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.50	<4
Plum Organics® Stage 2 Mango, Carrot & Coconut Cream, 3.5 oz	6/27/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	5	0.50	6	0.59	<4
Plum Organics® Stage 2 Pear, Blueberry, Avocado & Granola, 3.5oz	3/16/2019	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pear, Purple Carrot & Blueberry, 4oz	11/6/2017	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.68	<4
Plum Organics® Stage 2 Pear, Purple Carrot & Blueberry, 4oz	11/6/2017	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.57	<4
Plum Organics® Stage 2 Pear, Purple Carrot & Blueberry, 4oz	11/6/2017	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.68	<4
Plum Organics® Stage 2 Pear, Purple Carrot & Blueberry, 4oz	11/6/2017	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.79	<4
Plum Organics® Stage 2 Strawberry, Banana & Granola 3.5oz	3/17/2019	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Butternut Squash, Carrot, Chickpea & Corn, 3.5oz	5/24/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 2 Butternut Squash, Carrot, Chickpea & Corn, 3.5oz	5/25/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 3 Carrot, Chickpea, Pea, Beef & Tomato, 4oz	5/1/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	5	0.57	5	0.57	<4
Plum Organics® Stage 3 Carrot, Chickpea, Pea, Beef & Tomato, 4oz	5/2/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	9	1.02	4	0.45	<4
Plum Organics® Stage 3 Carrot, Chickpea, Pea, Beef & Tomato, 4oz	5/15/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	4	0.45	6	0.68	<4
Plum Organics® Stage 3 Carrot, Sweet Potato, Corn, Pea & Chicken, 4oz	6/27/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	4	0.45	6	0.68	<4
Plum Organics® Stage 3 Carrot, Spinach, Turkey, Corn, Apple & Potato, 4oz	7/6/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	9	1.02	<4	*	<4
Plum Organics® Stage 3 Carrot, Spinach, Turkey, Corn, Apple & Potato, 4oz	7/16/2018	113	<4	<100ppb/not speciated	<100ppb/not speciated	10	1.13	5	0.57	<4
Plum Organics® Stage 2 Banana, Raspberry & Barley Baby Bowls, 3.6 oz.	5/21/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	8	0.79	<4
Plum Organics® Stage 2 Banana, Raspberry & Barley Baby Bowls, 3.6 oz.	5/21/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.50	<4
Plum Organics® Stage 2 Banana, Raspberry & Barley Baby Bowls, 3.6 oz.	5/21/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pear, Cauliflower, Cherry & Raisin Baby Bowls, 3.6 oz.	5/17/2018	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
Plum Organics® Stage 2 Pear, Cauliflower, Cherry & Raisin Baby Bowls, 3.6 oz.	5/17/2018	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.40	<4
Plum Organics® Stage 2 Pear, Cauliflower, Cherry & Raisin Baby Bowls, 3.6 oz.	5/17/2018	99	4	<100ppb/not speciated	<100ppb/not speciated	4	0.40	6	0.59	<4
Plum Organics® Stage 1 Apple & Butternut Squash Baby Bowls, 3.6 oz	8/29/2018	102	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	4	0.41	<4
Plum Organics® Super Smoothie Pear, Sweet Potato, Spinach, Blueberry with Beans & Oats, 4oz (Pack of 6)	5/21/2018	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.57	<4
Plum Organics® Super Smoothie Pear, Sweet Potato, Spinach, Blueberry with Beans & Oats, 4oz (Pack of 6)	5/21/2018	113	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	7	0.79	<4
Plum Organics® Super Smoothie Pear, Sweet Potato, Spinach, Blueberry with Beans & Oats, 4oz (Pack of 6)	5/21/2018	113	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.68	<4
Plum Organics® Super Puffs® Apple with Spinach, 1.5oz	10/28/2017	7	201	53	0.37	14	0.10	13	0.09	<4
Plum Organics® Super Puffs® Mango with Sweet Potato, 1.5oz	10/28/2017	7	222	52	0.36	14	0.10	11	0.08	<4
Plum Organics® Super Puffs® Blueberry with Purple Sweet Potato, 1.5oz	10/28/2017	7	218	49	0.34	11	0.08	13	0.09	<4
Plum Organics® Super Puffs® Strawberry with Beet, 1.5oz	10/29/2017	7	228	62	0.43	15	0.11	16	0.11	<4
Plum Organics® Teensy Snacks® Berry, 1.75oz	10/29/2017	10	15	<10	*	<4	*	35	0.35	<4
Plum Organics® Teensy Snacks® Peach, 1.75oz	10/29/2017	10	14	<10	*	<4	*	20	0.20	5
Plum Organics® Little Teethers Blueberry, 3.17oz (Pack of 6)	10/28/2017	5	42	<100ppb/not speciated	<100ppb/not speciated	6	0.03	29	0.15	<4

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Plum Organics® Little Teethers Banana with Pumpkin, 3.17oz (Pack of 6)	10/29/2017	5	40	22	0.11	5	0.03	14	0.07	<4
Plum Organics® Little Teethers Apple with Leafy Greens, 3.17oz (Pack of 6)	10/28/2017	5	57	32	0.16	26	0.13	8	0.04	<4
Plum Organics® Mighty Dinos® Cheddar Crackers, 6.8oz	10/29/2017	20	10	<10	*	18	0.36	21	0.42	<4
Plum Organics® Super Puffs® Apple with Spinach, 1.5oz	3/16/2018	7	243	61	0.43	20	0.14	9	0.06	<4
Plum Organics® Super Puffs® Apple with Spinach, 1.5oz	3/16/2018	7	462	80	0.56	21	0.15	23	0.16	<4
Plum Organics® Super Puffs® Apple with Spinach, 1.5oz	3/16/2018	7	384	85	0.60	19	0.13	31	0.22	<4
Plum Organics® Super Puffs® Blueberry with Purple Sweet Potato, 1.5oz	3/16/2018	7	245	63	0.44	14	0.10	12	0.08	<4
Plum Organics® Super Puffs® Blueberry with Purple Sweet Potato, 1.5oz	3/16/2018	7	277	70	0.49	13	0.09	12	0.08	<4
Plum Organics® Super Puffs® Blueberry with Purple Sweet Potato, 1.5oz	3/16/2018	7	422	83	0.58	14	0.10	23	0.16	<4
Plum Organics® Super Puffs® Blueberry with Purple Sweet Potato, 1.5oz	3/16/2018	7	389	89	0.62	14	0.10	23	0.16	<4
Plum Organics® Super Puffs® Blueberry with Purple Sweet Potato, 1.5oz	3/16/2018	7	470	86	0.60	16	0.11	28	0.20	<4
Plum Organics® Super Puffs® Mango with Sweet Potato, 1.5oz	3/16/2018	7	246	62	0.43	15	0.11	11	0.08	<4
Plum Organics® Super Puffs® Mango with Sweet Potato, 1.5oz	3/16/2018	7	456	83	0.58	15	0.11	24	0.17	<4
Plum Organics® Super Puffs® Mango with Sweet Potato, 1.5oz	3/16/2018	7	388	85	0.59	16	0.11	49	0.34	<4
Plum Organics® Super Puffs® Strawberry with Beet, 1.5oz	3/16/2018	7	217	57	0.40	13	0.09	11	0.08	<4
Plum Organics® Super Puffs® Strawberry with Beet, 1.5oz	3/16/2018	7	468	83	0.58	17	0.12	48	0.34	<4
Plum Organics® Super Puffs® Strawberry with Beet, 1.5oz	3/16/2018	7	410	74	0.52	17	0.12	14	0.10	<4
Plum Organics® Super Puffs® Strawberry with Beet, 1.5oz	10/29/2017	7	225	not speciated	not speciated	12	0.08	15	0.11	<4
Plum Organics® Stage 2 Sweet Potato, Apple & Corn, 4oz	11/1/2017	113	10	<10	*	<4	*	<4	*	<4

* < LoQ (Limit of Quantitation)

** Where total ppb is less than the more stringent FDA standard of 100ppb, we do not speciate because even if entirely inorganic, it is below the relevant standard.

*** FDA decreased level from 6 ug/kg to 3 ug/kg after the submission of our letter in December 2019 (see published report Feb. 2020). Only one of our products—which was discontinued in 2017—would have exceeded the new threshold by .07ug. That product met the FDA standard in place at the time it was produced, tested, and when we submitted our original response to the Subcommittee. <https://www.sciencedirect.com/science/article/pii/S0273230019302806?via%3Dihub>

**** There is no regulatory criteria for mercury for these products. Our criteria are a) that we use no high-risk ingredients, like shellfish; and b) that the testing shows that mercury levels are low in these products. All but two of our tested products showed mercury levels under 4 ppb, which is the limit of quantitation. Of the two products that showed quantifiable levels of mercury, one showed mercury of 5 ppb and one of 6 ppb. Under EU regulations, acceptable limits of methyl mercury in certain seafoods range from 500 ppb to 1000 ppb. WHO/JECFA has a mercury exposure limit of 2.3 ug/day for a 10 kg child. A concentration of 5 ppb and 6 ppb for mercury in product would be 0.05 and 0.06 ug for a 10 kg child, significantly below the WHO/JECFA exposure limit.

Baby Food Product Testing Results (2019-)

We are confident in the safety and quality of our products. Heavy metals are present throughout the environment, including soil and water. Plum Organics is committed to minimizing heavy metals in our products and supports FDA's development, based on scientific consensus, of clear and specific guidance for baby food manufacturers on appropriate levels of heavy metals in food. As our testing below shows, each product is well within levels deemed acceptable by independent authorities.

Reference Criteria				FDA 100 ppb inorganic arsenic limit for rice cereal and/or EU 300 ppb for rice crackers **	Prop 65 MAX limit (10 µg/day) **	WHO/JECFA MAX limit 8.0 µg/day (per 10 kg child)	FDA MAX limit (3 µg/day) ***			
Product Name	Date	Serving size in grams	Total ppb Arsenic (As)	ppb Arsenic (inorganic)	Arsenic (inorganic) µg/serving	ppb Cadmium (Cd)	Cd µg/serving	ppb Lead	Lead µg/serving	ppb Mercury ****
JAMMY SAMMY GRAPE JELLY PEANUT BUTTER BAR 29g	4/27/2020	29	18	<100ppb/not speciated	<100ppb/not speciated	10	0.29	<4	*	<4
JAMMY SAMMY STRAWBERRY JELLY PEANUT BUTTER BAR 29g	4/27/2020	29	22	<100ppb/not speciated	<100ppb/not speciated	12	0.348	<4	*	<4
MBC 01566 PLM S2 PEAR SPN PEA 4OZ 50CA	10/7/2020	113	7	<100ppb/not speciated	<100ppb/not speciated	7	0.791	<4	*	<4
PLM JAM SAM APL CINN OTML 6X5 5.15OZ 6CA	1/26/2021	29	20	<100ppb/not speciated	<100ppb/not speciated	15	0.435	<4	*	<4
PLM JAM SAM BLUE OTML 6X5 5.15OZ 6CA	1/26/2021	29	12	<100ppb/not speciated	<100ppb/not speciated	7	0.203	6	0.174	<4
PLM JAM SAM PB GRP 6X5 5.15OZ 6CA	1/26/2021	29	8	<100ppb/not speciated	<100ppb/not speciated	7	0.203	6	0.174	<4
PLM JAM SAM PB STRAW 6X5 5.15OZ 6CA	1/26/2021	29	12	<100ppb/not speciated	<100ppb/not speciated	7	0.203	4	0.116	<4
PLM M4 BAN BLUE SWPOT CAR GRKYOG	10/7/2020	113	<4	<100ppb/not speciated	<100ppb/not speciated	9	1.017	10	1.13	4
PLM M4 BAN KIWI SPN GRKYOG BARLY	10/7/2020	113	<4	<100ppb/not speciated	<100ppb/not speciated	8	0.904	<4	*	<4
PLM M4 STRAW BAN GRKYOG KALE	10/7/2020	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	5	0.565	<4
PLM MGTY SNK BARS BLUE 4OZ	10/7/2020	19	30	<100ppb/not speciated	<100ppb/not speciated	18	0.342	10	0.19	<4
PLM MGTY SNK BARS STRAW 4OZ	10/7/2020	19	31	<100ppb/not speciated	<100ppb/not speciated	39	0.741	6	0.114	<4
PLM MGTY SNK BARS STRAW 8X6 4OZ 8CA	9/17/2020	19	22	<100ppb/not speciated	<100ppb/not speciated	12	0.228	6	0.114	<4
PLM MGTY SNK BARS STRAW 8X6 4OZ 8CA	9/17/2020	19	23	<100ppb/not speciated	<100ppb/not speciated	12	0.228	6	0.114	<4
PLM MGTY SNK BARS STRAW 8X6 4OZ 8CA	9/18/2020	19	25	<100ppb/not speciated	<100ppb/not speciated	12	0.228	6	0.114	<4
PLM MPTN APL BN PEA CIN	1/14/2020	106	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM MPTN APL BN PEA CIN	1/14/2020	106	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM MPTN APL BN PEA CIN	1/14/2020	106	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM MVEG CAR PEAR POM OATS 1X6 4OZ 6CA	1/27/2021	113	5	<100ppb/not speciated	<100ppb/not speciated	4	0.452	5	0.565	<4
PLM MVEG ZUCC APL WATRMLON 1X6 4OZ 6CA	1/27/2021	113	7	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM S1 JUST PRU 2X6 3.5OZ 12CA	10/7/2020	99	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM S2 APL CAR 4OZ	10/7/2020	113	<4	<100ppb/not speciated	<100ppb/not speciated	12	1.356	<4	*	<4
PLM S2 BAN PUM 1X6 4OZ 6CA	1/27/2021	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM S2 BAN PUM 4OZ	10/7/2020	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM S2 BAN RASP BAR	1/14/2020	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM S2 BAN RASP BAR	1/14/2020	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM S2 BAN RASP BAR	1/14/2020	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM S2 BAN RASP BAR	1/14/2020	99	5	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM S2 PEAR MANG	10/7/2020	113	<4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLM S2 STRAW BAN GRNOLA 1X6 3.5OZ 6CA	1/27/2021	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	6	0.594	<4
PLM S3 MEAL CAR SPN TRKY CRN 1X6 4OZ 6CA	1/27/2021	113	4	<100ppb/not speciated	<100ppb/not speciated	15	1.695	6	0.678	<4
PLMS2 APL BNUT SQSH GRNOLA 1X6 3.5OZ 6CA	1/27/2021	99	4	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4
PLMS2 PEAR BLUE AVOC GRNOLA 1X6 3.5OZ6CA	1/27/2021	99	8	<100ppb/not speciated	<100ppb/not speciated	<4	*	<4	*	<4

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