

October 20, 2021

Harry Overly
President and Chief Executive Officer
Sun-Maid Growers of California

Via E-mail

Dear Mr. Overly,

Consumer Reports writes to urge you to suspend the manufacturing and sale of Plum Organics infant rice cereal due to continued high levels of inorganic arsenic in these products. This clearly has become a chronic issue, as evidenced by the test results outlined in a recent congressional report and the decision earlier this year by Beech-Nut Nutrition Company to discontinue the manufacture of baby rice cereals due to the arsenic issue.

Even low levels of inorganic arsenic can have adverse effects on cognitive development in young children. Given this, and given infant rice cereal is responsible for more than half of all exposure to inorganic arsenic in infants and toddlers, removing these products from the market would be the most effective approach in addressing this issue and providing assurances to parents and caregivers. The suspension of the manufacturing and sale of infant rice cereal should remain in effect until a more protective health standard for inorganic arsenic is implemented through updated regulations or voluntary measures.

Inorganic arsenic is considered to be the environmental substance with the most significant potential threat to human health, according to the Department of Health and Human Services' Agency for Toxic Substances and Disease Registry ([ATSDR](#)). It has been linked to a range of adverse health effects, including diabetes, high blood pressure and several types of cancer. Particularly troubling are studies showing damaging effects on the central nervous system and cognitive development in children.

A [study](#) of Maine schoolchildren found that inorganic arsenic levels in drinking water above 5 ppb “showed significant reductions in Full Scale IQ scores.” Another [study](#) found that for infants and toddlers, solid food was responsible for roughly three-quarters of exposure to inorganic arsenic with infant rice cereal being responsible for more than half (55 percent) of total exposure. Drinking water was responsible for roughly the same amount of exposure to inorganic arsenic as solid baby foods other than infant rice cereal (19 percent).

Rice is known to accumulate inorganic arsenic at a rate much higher than other grains. Although rice-based products make a significant portion of solid foods for infants and toddlers, other grains have been shown to have much lower levels of arsenic. [Testing](#) by Consumer Reports found that the grains amaranth, buckwheat, millet, and polenta or grits had negligible levels of inorganic arsenic. Bulgur, barley, and farro also have very little arsenic. Quinoa had average inorganic arsenic levels comparable to those of other alternative grains, and oats has been

identified as another option that is lower in inorganic arsenic. It is evident that removing infant rice cereal from a baby's diet would not limit the availability of other options.

As noted in the recent [report](#) by the House Oversight Subcommittee on Economic and Consumer Policy, all 19 of Plum Organics Super Puff products tested, which are made with rice, had levels of total arsenic that exceeded 200 parts per billion (ppb), with the highest being 470 ppb. While the levels of inorganic arsenic in these products were below 100 ppb, these levels are much higher than levels of inorganic arsenic allowed in bottled water (10 ppb), drinking water (15 ppb), or apple juice (10 ppb).

It is imperative that Plum Organics follow the lead of Beech-Nut and suspend the manufacturing and sale of all infant rice cereals until a more protecting health standard is in place. Plum Organics also should commit to having health protective standards of inorganic arsenic in all the baby food products they sell and refrain from selling products that exceed that standard.

Thank you for your attention to this critical issue. We request hearing back from you by Friday, November 5, 2021.

Sincerely,

/s/

Brian Ronholm
Director, Food Policy
Consumer Reports