

October 20, 2021

Doug McMillon President and CEO Walmart, Inc.

Via E-mail

Dear Mr. McMillon,

Consumer Reports writes to urge you to suspend the manufacturing and sale of 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 recent recall issued by Walmart.

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 (<u>ATSDR</u>). 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 <u>study</u> of Maine schoolchildren found that inorganic arsenic levels in drinking water above 5 ppb "showed significant reductions in Full Scale IQ scores." Another <u>study</u> 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 <u>report</u> by the House Oversight Subcommittee on Economic and Consumer Policy, instead of testing baby foods for inorganic arsenic, Walmart sets standards for inorganic arsenic in baby foods for their private label and takes the word of their manufacturers and suppliers that they are meeting them. Prior to September 14, 2012 Walmart had an internal standard for inorganic arsenic in rice cereal, oatmeal cereal, and puffed grain of 100 parts per billion (ppb). On that date, Walmart created a more protective health standard, allowing no more than 23 ppb for these products. However, on December 20, 2018, Walmart reverted back to the 100 ppb standard, and has not publicly shared why it reversed course on such a critical public health issue.

Earlier this month on October 8, 2021, Walmart <u>recalled</u> three lots of Parent's Choice rice baby cereal, after routine sampling by the Food and Drug Administration (FDA) found inorganic arsenic levels above 100ppb. If Walmart had conducted its own testing of finished baby products for inorganic arsenic, this problem could have been discovered before these products were sold.

It is imperative that Walmart follow the lead of Beech-Nut and suspend the manufacturing and sale of all infant rice cereals until a more protective health standard is in place. Walmart could achieve this standard if it reverts back to its previous standard for inorganic arsenic of 23 ppb for all baby foods sold, and also test finished baby food products for inorganic arsenic.

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