



August 13, 2025

The Honorable Robert Bonta
Attorney General
California Department of Justice
P.O. Box 944255
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Dr. Erica Pan, MD
Director and State Public Health Officer
California Department of Public Health
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Dear Attorney General Bonta and Dr. Pan,

We write to alert you to [our recent findings](#) regarding compliance with a California state [law](#) that requires baby food manufacturers to test for levels of arsenic, cadmium, lead, and mercury and make the results publicly available on their website. We also urge you to investigate companies that may not be complying with the law, making it difficult for parents and caregivers to compare products before making purchasing choices and potentially giving the companies an unfair competitive advantage.

On behalf of parents and caregivers, Consumer Reports and Unleaded Kids recently evaluated 39 baby food brands based on availability and ease of data access. While 16 baby food companies are providing straightforward access to their test results, there are a number of companies that have created barriers that make the process of accessing test results more difficult. Some of these barriers include requiring consumers to track down and enter additional information, such as best-by date or lot numbers. This information means they must either purchase the product or find it in a store and precisely enter the information to get the information for each and every item they are considering.

The most troublesome approach is one used by Beech-Nut, which requires entry of three sets of numbers (up to 28 digits), and then the completion of a CAPTCHA for each lot and each product. This poses significant barriers to making the information publicly available, as required by law.

Of the companies that have created barriers to accessing test results, we would urge you to examine the following examples to determine whether they are complying with the law.

- **Beech-Nut.** As noted above, requires [three sets of numbers](#): UPC Code [up to 12 digits]; Lot Code [first 7 digits]; and Best Buy Date [9 digits] no spaces, as well as CAPTCHA to access test results.
- **Little Spoon.** Because this is a direct-to-consumer brand, it doesn't use UPCs or display products on store shelves. Thus, it [requires a lot code](#) that can be accessed only after purchase. It [claims](#) to have the "greatest level of transparency available in the U.S."

- **Sprout Organics.** Requires a consumer to [enter a lot number](#) to access results.
- **Good & Gather Baby (Private label brand for Target).** Test results are accessed through a QR code on the label, which links to a webpage that requires finding a product from a list, [entering its lot code](#) (3 digits) and solving a CAPTCHA to access test results. This website is not available on the brand's web page.
- **Little Journey (Private label brand for Aldi).** Test results can only be accessed through a QR code from the label, which links to a [webpage](#) for each product. This website is not available on the brand's web page.
- **O Organics (Private label brand for Albertsons).** Test results are accessed through a QR code on the label, which links to a webpage that requires finding a product from a list, [entering its lot code](#) (3 digits) and solving a CAPTCHA to access test results. This website is not available on the brand's web page.
- **Parent's Choice (Private label brand for Walmart).** Test results are accessed through a QR code on the label, which links to a [webpage](#) that requires finding a product from a list, entering its lot code (3 digits) and solving a CAPTCHA to access test results. This website is not available on the brand's web page.
- **Simple Truth (Private label brand for Kroger).** Test results can only be accessed through a QR code, which opens a [webpage](#), scroll to find the product on the list, and then input the "Best if Used By" date. This website is only accessible via the QR code, and not available on the company's web page.

Because the barriers consumers face in accessing these test results appear to be consistent across many brands, **we additionally urge CDPH to update its [FAQ](#) to explain that requiring entry of a lot code does not qualify as making this information publicly available.**

Thank you for your attention to this matter. Please contact us should you have any questions.

Sincerely,

/s/

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