



FDA's New Closer to Zero Action Levels *Won't* Get Us Closer to Zero

Healthy Babies Bright Futures' statement on Closer to Zero's proposed action levels — after years of FDA's stalling.

January 24, 2023 — The U.S. Food and Drug Administration released draft guidance today as part of their Closer to Zero initiative to limit allowable lead levels in many types of popular baby food. Although the first sentence of the guidance states that “the FDA is committed to reducing lead in food,” today’s proposal does not act on that commitment.

For more than two years, Healthy Babies Bright Futures has anxiously awaited the FDA’s Closer to Zero action levels, promised as part of the agency’s plan to reduce exposure to lead, arsenic, cadmium, and mercury in baby foods. The action levels released today for lead, the first toxic heavy metal the agency is addressing, are not enough to protect the next generation of babies from harmful heavy metals in their food.

Children under two years of age lose over 11 million IQ points from exposure to heavy metals in food, according to an analysis commissioned by HBBF and conducted by Abt Associates. One in six children in America has a developmental disability, and exposure to toxic heavy metals causes permanent decreases in IQ, diminished future economic productivity, and lifelong problems with learning and behavior.

[Healthy Babies Bright Futures' 2019 study](#) found heavy metals in **95% of baby foods tested**. Since then, parents and lawmakers alike have been calling on the FDA to set protective action levels for the food that babies eat. Unfortunately, the Closer to Zero action levels don’t move the needle towards zero.

“These proposed action levels don’t do enough to get us closer to zero,” says Charlotte Brody, HBBF’s National Director. “The action levels released by the FDA today for the most part put a rubber stamp on the status quo — signifying that the current levels of lead in baby food are ‘close enough.’ Why has the FDA’s Closer to Zero program spent years to create proposed guidance that won’t do enough to make baby food safer?”

Closer to Zero’s proposed number don’t reflect enough progress to protect babies’ brain development from harmful chemicals: Only 16 of over 1,000 baby food tests we’ve assessed exceed FDA’s proposed limits — meaning that the proposed limits would not affect 98% of contaminated foods or make them safer for babies.

The FDA didn’t propose **any** lead limit for puffs and teething biscuits — even though they account for 7 of the 10 highest lead levels in the [more than 1,000 food tests HBBF has assessed](#).



One positive element of the proposal is a new limit for sweet potatoes, which often exceed the limit FDA has proposed (20 ppb). But, disappointingly, for all other foods, only rare outlier samples will be affected. In addition, FDA's proposal does not help families that make their own baby food at home, since it addresses only commercial baby food brands.

Our research has shown that [homemade baby food is just as likely to be contaminated with heavy metals](#) as store-bought brands.

“Nearly all baby foods already meet the action levels FDA lays out in this draft,” says Jane Houlihan, HBBF’s Research Director and the author of our baby food studies. “Grain-based snacks are not even covered, even though they account for 7 of the 10 highest lead levels we’ve seen in over 1,000 tests. If this proposal is finalized, the Closer to Zero promise of **continually** lowering limits over time will be vital to the health and safety of our babies.”

To interview Jane Houlihan or Charlotte Brody, please email HBBF’s Communications Director, Paige Glidden, at pglidden@hbbf.org.

For more information on HBBF’s baby food studies, visit here:

- **What’s In My Baby’s Food?** Our study found 95 percent of tested baby foods contain toxic chemicals that lower babies’ IQ, including arsenic and lead. ([View the report](#), 2019)
- **Is Homemade Baby Food Better?** 94% of both baby foods and homemade and “family” brands tested were contaminated with one or more of four toxic heavy metals. Heavy metal levels varied widely by food type, not by who made the food. ([View the report](#), 2022)
- **Arsenic in 9 Brands of Infant Cereal.** Our study found 6 times more arsenic in infant rice cereal than in other infant cereals. ([View the report](#), 2017)