
ASSOCIATION OF FOOD AND DRUG OFFICIALS

2017

RESOLUTION NUMBER 2017-4

Submitted by: AFDO Board of Directors

Date: June 3, 2016

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Concerning: Lead Levels in Spices

Whereas, lead is a naturally occurring element found in all parts of the environment such as in the air, in soil, and in water due to the release of lead by human activities such as past use of leaded gasoline, use of lead based paint, and lead compounds used in household products such as ceramics, plumbing pipes and materials, batteries, ammunition, and cosmetics, and

Whereas, dietary exposure to lead has received less attention than the traditional environmental antecedents such as, deteriorated lead-based paint and lead contaminated dust, and

Whereas, lead can accumulate in the body over time and can cause health problems, including delayed mental and physical development and learning deficiencies, and

Whereas, pregnant women, infants and young children are especially vulnerable and should avoid exposure to lead, and

Whereas, only two federal regulatory limits for lead exist at present - the Environmental Protection Agency (EPA) limit of 0.015 ppm in drinking water (National Primary Drinking Water Regulations, 2010) and the FDA guidance level of 0.1 ppm in candy. (FDA, 2006), and

Whereas, the FDA has set a Provisional Tolerable Total Intake Level (PTTIL) of 6 micrograms of lead per day for children 6 years of age and under. (FDA, 2006), and

Whereas, the PTTIL is the total daily intake from all sources that provides a reasonable margin of protection against the known adverse effects of lead, and

Whereas, there is currently no recognized safe level of lead in products (CDC, 2007) nor is there a safe level of lead found in the blood (CDC, 2007), and

Whereas, the CDC has set a "level of concern" for lead in blood of children under 6 years of age at 10ug/dL and then in 2012 CDC recommended lowering this to a "reference level" of 5 ug/dL. (CDC, 2012), and

Whereas, states have reported testing of imported spices and finding they contain lead levels significantly above the 0.1ppm guidance level in candy, and

Whereas, FDA and states have taken enforcement action on spice manufacturers and distributors where elevated levels of lead in spices have been found and which have resulted in voluntary recalls of their products, therefore be it

Resolved, that AFDO request FDA to work with state food protection agencies and state lead prevention programs to research and review existing surveillance of imported spices for lead as well as review lead poisoned child cases with spices as a potential antecedent, and be it further

Resolved, that AFDO request FDA to consider whether a national regulatory or guidance level for lead in spices should be created due to the percentage of products in which a detectable level of lead has been found.