

May 24, 2024

Dr. Chavonda Jacobs-Young
Under Secretary for Research, Education, and Economics
USDA Chief Scientist
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Under Secretary Jacobs-Young:

We, the undersigned organizations and associations represent a broad array of food producers, processors, and marketers as well as state departments of agriculture working cooperatively to address the unintentional presence of heavy metals in certain food products. We recently engaged with Steve Zeng, Division Director of the Food Safety Division as part of our engagement on issues surrounding heavy metals and we wanted to follow up on that conversation. Recent headlines have shown that some heavy metals in the environment can be absorbed by nutritious plants as part of the natural growth process.

It is our understanding that FDA intends to use the “Closer to Zero” approach to establish thresholds for heavy metals in foods. While this process is intended to focus upon foods commonly consumed by infants and toddlers, we are aware that FDA may expand this effort to consumers of broader age ranges. We acknowledge the need to better understand the potential impacts of heavy metals in the diet related to consumer health, especially when considering infants and young children. We need USDA’s leadership in researching the issue to ensure there is balance in the ultimate outcome of this effort.

As such, we write to open a dialogue with you to begin to discuss research opportunities for this novel issue. Research related to the food supply chain has been incredibly limited to date and much more needs to be done. As we discussed in our meeting with Steve, USDA is a full partner with FDA in this Closer to Zero effort, and USDA should not and cannot be passive. We implore you to triage research ideas related to heavy metals in the food supply chain including viable mitigation techniques. There are many nutritious crops vulnerable to this issue in many growing regions of this country, and while understanding every crop in every growing region of concern is not practical, an effective triage plan could identify the most critical crops to conduct research on and for which regions of the country they are grown.

Questions that need to be answered include, what are the real health risks? How do we balance health risks to some populations against health benefits to the larger populace? If crops are at risk, what are the mechanisms that take-up the heavy metal(s) in question? Finally, and critically, what are practical mitigation techniques farmers might implement with respect to at-risk crops? What are the cost and supply impacts of these mitigation techniques? Once USDA has conducted a triage to identify crops, we suggest that USDA convene a broad group of stakeholder experts on this issue, to better understand the situation and develop the best plan of action for all involved.

We would like to set up a meeting with you to continue to discuss heavy metal research opportunities. Thank you for your attention to this issue, we look forward to hearing from you soon.

Sincerely,

Florida Fruit and Vegetable Association
Georgia Fruit and Vegetable Growers Association
International Fresh Produce Association
National Association of State Departments of Agriculture
National Onion Association
National Potato Council
Texas International Produce Association
USA Rice
US Sweet Potato Council
Western Growers

Cc: Steve Zeng, Division Director of the Food Safety Division, USDA NIFA