

Heavy-metal testing requirements for baby-food brands

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<https://heavymetalcertified.com/requirements/baby-food-heavy-metals>. Retrieved 2026-10-06.

The landscape, in one view

A baby-food brand faces heavy-metal obligations from two directions at once: a federal layer that sets expectations without a binding testing mandate, and a growing set of state laws that require testing and public disclosure. This page orients a brand to both. It is not legal advice, and a brand should confirm its obligations with its own counsel and against the enacted text of each law that applies to it.

The federal layer: action levels, not a testing mandate

On January 6, 2025, the FDA finalized action levels for [lead](#) in processed food intended for babies and young children, the first such guidance and part of its [Closer to Zero](#) initiative. The action levels are:

- 20 ppb for dry infant cereals;
- 20 ppb for single-ingredient root vegetables;
- 10 ppb for other processed baby foods, subject to the guidance's exclusions.

Two things about these levels matter for a brand. First, they are action levels expressed as guidance, not binding maximum limits, and they cover lead only, not the other metals. Second, there is, as of 2026, no federal requirement that a baby-food manufacturer test its finished product for heavy metals at a qualified laboratory. The Baby Food Safety Act, which would give the FDA authority to set and enforce limits on heavy metals in food for children, has been introduced but not enacted. The federal picture is a set of expectations a brand is measured against, without a federal testing duty behind them.

The state layer: a widening testing-and-disclosure patchwork

Where the federal government has not imposed a testing mandate, states have. California set the template with AB 899, and other states have followed with closely aligned laws:

- [California, AB 899](#): monthly testing of each production aggregate for [arsenic](#), [cadmium](#), lead, and [mercury](#), and public website disclosure of results since January 1, 2025.
- [Maryland, Rudy's Law](#): monthly testing from 2025 and public website disclosure from 2026, with a QR code on the label of a product subject to an actionable limit.

- Virginia and Illinois have enacted comparable baby-food testing and disclosure laws, effective in 2026, and further states, including Connecticut and Vermont, are phasing in monthly-testing, disclosure, and QR-labeling requirements between 2026 and 2028.

The laws are closely aligned in substance: a representative sample of each production aggregate, tested monthly for the same four metals, with public disclosure of the results. Most exclude infant formula from the definition of baby food. For a brand selling nationally, the practical consequence is that testing and disclosure are becoming required almost everywhere it ships, one jurisdiction at a time, on aligned but separate terms.

What HMTc adds, and what it does not replace

None of these laws tells a brand how to bring a result down, how to verify that a correction held, or how to turn a compliant result into a claim a retailer or a consumer can check. That is the gap Heavy Metal Tested & Certified is built to close.

The monthly, per-aggregate testing the state laws require is close to the per-lot testing HMTc certification relies on, so a brand meeting the laws is already generating much of the data a certification uses. When a result does not meet a limit, the [readiness](#) and [corrective-action](#) pathways turn it into a defined investigation, a root-cause correction, and a verified retest. Certification then produces a product-specific claim, verified against a published limit, on top of the disclosure the laws already require.

The boundary is firm and applies to every jurisdiction. HMTc certification does not satisfy, replace, or discharge any of these legal obligations. A covered brand remains responsible for its own statutory testing, its disclosures, and its labeling in each state that regulates it. HMTc is not legal advice and does not determine a brand's reporting, disclosure, recall, or contractual obligations. A single control and verification program is a way to meet the shared substance of a fragmenting set of rules, not a substitute for complying with each on its own terms.

Begin by [finding the standard](#) that applies to your product. No company name is required to look one up.