

California baby-food testing and disclosure (AB 899)

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

What AB 899 requires

California Assembly Bill 899, signed into law in 2023, applies to manufacturers of baby food sold or distributed in California. It is summarized here for orientation; this page is not legal advice, and a brand should confirm its obligations with its own counsel and against the enacted text.

As the law is written, a covered manufacturer must:

- Test a representative sample of each production aggregate of its final baby food product for four toxic elements, [arsenic](#), [cadmium](#), [lead](#), and [mercury](#), at least once a month, at a proficient laboratory.
- Since January 1, 2025, make the results publicly available on the manufacturer's website, publishing the name and level of each toxic element present in each production aggregate, and keep that information available for the product's shelf life plus one month.
- Include on the product label a QR code linking to the online results where a product tests above the applicable federal action levels.
- Provide test results to an authorized agent of the California Department of Public Health on request.

For this category, the two questions a brand usually hopes to avoid are already answered by statute: the testing happens, and the results are disclosed. What remains open is not whether the numbers exist, but what a brand does with them.

What AB 899 does not cover

"Baby food" under AB 899 means food marketed for children under two years of age, packaged in forms such as jars, pouches, tubs, and boxes. Two things sit outside it:

- Infant formula is excluded from the definition of baby food. A separate bill, AB 2302, would extend monthly heavy-metal testing and reporting to infant formula; as of August 2026 it remains in committee and is not law. A formula brand is not covered by AB 899, and should not treat this page as if it were.
- Dietary supplements were clarified out of the baby-food testing and labeling requirements. A supplement brand's heavy-metal obligations arise under other authorities, not AB 899.

Coverage is also specific to California. A brand selling nationally faces this obligation for its California distribution regardless of where it is made, and faces the broader regulatory and litigation environment everywhere else.

What HMTc adds, and what it does not replace

AB 899 mandates the monthly testing and the disclosure. It does not tell 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 AB 899 requires is close to the continuous lot surveillance HMTc already runs. A brand meeting AB 899 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, rather than a disclosed number with no plan attached.
- Certification produces an independently verified, product-specific claim against a published limit. AB 899 disclosure tells a consumer what a product contains; the mark tells a checkable story about a product meeting a defined standard under ongoing surveillance.

The boundary is firm, and stating it is what keeps the rest credible. HMTc certification does not satisfy, replace, or discharge the AB 899 legal obligation. A covered brand remains responsible for its own statutory testing, its website disclosure, its label QR code where required, and for providing results to the California Department of Public Health. HMTc is not legal advice and does not determine a brand's reporting, disclosure, recall, or contractual obligations. The program is a way to turn mandated data into correction and a verified claim, not a substitute for compliance.

Enforcement is active

This is not a dormant statute. The California Attorney General has issued warning letters to baby-food manufacturers over heavy-metal testing and disclosure, and [Proposition 65](#) separately allows enforcement, including by private parties acting in the public interest, for exposure to listed chemicals such as lead and cadmium, which a certification does not displace. A brand already generating this data can use it as the basis for documented correction and an independently verified claim, rather than stopping at the mandated disclosure.

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