



# Code of Practice: First 1,000 Day Promise

*Version 6: November 2023*



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label**  
PROJECT®  
Clean. Pure. Science.

**The Clean Label Project is a national non-profit with the mission to bring truth and transparency to consumer product labeling.**

**Together, we are changing the definition of food and consumer product safety in America.**

This Code of Practice: First 1,000 Day Promise is subject to revision.  
Go to [www.cleanlabelproject.org](http://www.cleanlabelproject.org) to confirm the current version.  
Questions, clarification, interpretations, and suggested revisions regarding this Code of Practice: First 1,000 Day Promise may be provided in writing to:

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## Objectives and Disclaimers

This Code of Practice: First 1,000 Day Promise Standard provides criteria for the evaluation and marketing of manufacturers seeking compliance and certification for their products to the Clean Label Project Code of Practice: First 1,000 Day Promise Standard. The implied compliance, evaluations, and the contents contained within are limited exclusively to meeting the minimum requirements for the Clean Label Project Code of Practice: First 1,000 Day Promise Standard. It is the responsibility of the Operator to comply with all applicable state, national, and international laws such as, but not limited to, California Prop 65, FDA food labeling laws, FDA food safety laws, FDA baby food or infant formula compliance laws, FDA pesticide tolerance level requirements, Country of Origin labeling, and USDA National Organic Program requirements, as applicable. It is also the responsibility of the Operator to comply with any applicable voluntary third-party private schemes such as, but not limited to Organic, Fair Trade, and Global Food Safety Initiative benchmarked standards. Clean Label Project Code of Practice: First 1,000 Day Promise Standard is inspired by European infant and baby food regulations as outlined in the Normative References. 'Inspired by European Regulations' means some of the requirements of the Code of Practice: First 1,000 Day Standard originated with language originally captured in one or more European food safety regulations. Clean Label Project Code of Practice: First 1,000 Day Promise Standard is not intended to be used as a substitute or to ensure compliance with any state, federal, or international law including European food safety regulations. The First 1,000 Day Standard does incorporate certain formulation and nutritional requirements. In no way is this meant to imply that the Clean Label Project Code of Practice: First 1,000 Day Promise Standard details all or any nutritional best practices for vulnerable populations. The caregivers of vulnerable populations in addition to brands seeking compliance to this Standard should work with medical professionals to ensure proper nutrition and safety.

In no way does compliance to this Code of Practice: First 1,000 Day Promise Standard imply compliance to any other state, federal, or international regulation or private standard. The Clean Label Project does not assume, displace, or undertake to discharge any obligations or responsibilities of the manufacturer or any other party, including but not limited to those responsibilities and obligations arising from the other certifications or standards referenced within this Code of Practice: First 1,000 Day Promise Standard. Under no circumstances shall Clean Label Project or any of its affiliates be liable for direct, indirect, incidental, consequential, special, punitive or any other use of this Code of Practice: First 1,000 Day Promise Standard. While this standard is approved for use in domestic and global markets, it is the responsibility of the Operator to understand the necessary labeling and marketing laws of the intended market. This Code of Practice: First 1,000 Day Promise Standard may be revised from time to time.

At the time of publication, the nutritional requirements for formula and foods, supplements, and consumer products targeting pregnant women and lactating mothers was still under development. These have not been included and are therefore outside the scope of the current Code of Practice: First 1,000 Day Promise Standard.

Use of this Code of Practice: First 1,000 Day Promise Standard is strictly voluntary.

## Code of Practice – First 1,000 Day Promise Award

### I. **Purpose**

Over the past several years, there has been a significant increase in the number of consumer product attribute certifications. Certifications such as Organic<sup>1</sup>, Non-GMO Project<sup>2</sup>, Gluten-free<sup>3,4</sup>, and Fair Trade<sup>5</sup> all serve as markers of quality and are increasingly being looked for on packaging by consumers shopping for products that align with their belief systems. Market opportunities exist for growers, suppliers, manufacturers, brand owners, and retailers looking to curate products that meet these consumer expectations.

Similarly, significant strides are being made in food and product safety. California Proposition 65<sup>6</sup> was originally created to address the growing concern amongst consumers about exposure to toxic chemicals. The State of California publishes a list of chemicals known to cause cancer or birth defects or other reproductive harm. While the issue of consumer exposure to toxic chemicals is not limited to the state of California, Prop 65 has moved the needle at the national level when it comes to 1) increasing manufacturer attention on the use of chemicals of concern and improving the quality/purity of ingredients used and 2) consumer protection. Due to government agencies such as the Consumer Product Safety Commission<sup>7</sup>, the Food and Drug Administration's Food Safety Modernization Act<sup>8</sup>, and momentum behind private efforts including the Global Food Safety Initiative<sup>9</sup>, the supply chain is increasingly becoming accustomed to the quality, system rigor and investment necessary to meet these requirements.

However, while the industry is making advances in food and product safety handling and production, consumers continue to have their trust in the food and consumer product industry tested. This especially holds true when it comes to vulnerable populations. Clean Label Project's 2019<sup>10,11</sup> heavy metals in baby food investigation, followed by Consumer Reports<sup>12</sup> and Healthy Babies Bright Futures<sup>13</sup> heavy metals in baby food investigations served as canaries in the coal mine as to the concerns that parents, researchers, academics, medical practitioners alike had about the long-term toxic effects that heavy metals can have on a developing child. In 2021, a House of Representatives Subcommittee conducted an independent investigation into the levels of heavy metals in best-selling baby foods. Its findings were startling but consistent with the findings and observations made by consumer advocacy organizations. The investigation resulted in the Baby Food Safety Act of 2021<sup>14</sup> and a follow-up commitment by the FDA, "Closer to Zero."<sup>15</sup> While the US federal government continues to promulgate rulemaking, the European Union has had specific baby food regulations in place for nearly 20 years. The general rule for baby food is Regulation (EU) no. 609/2013<sup>16</sup>, which regulates a broader food category called "Food for Specific Groups" (FSG), to which baby food belongs. It covers general composition and labeling rules for all baby food categories: infant formula, follow-on formula, processed cereal-based foods and baby foods for infants and young children. Adopting a more precautionary principal philosophy, Regulation (EC) no. 178/2002<sup>17</sup> and Regulation (EC) no. 1881/2006<sup>18</sup>, baby formula, processed cereal-

based foods and baby foods have strict contaminant tolerance regulations when it comes to heavy metals, pesticides, mycotoxins and more. When it comes to vulnerable populations, regulators, caregivers, and parents are demanding better from brands. This holds true when it comes to both nutrition and product contamination from ingredient sources and the manufacturing process.

The first 1,000 days of life are critically important to long term health and wellness. This period of time from pregnancy until the age of two is the window of opportunity when optimum brain and immune system development are formed. To date, consumer and regulatory calls to action around baby food have largely centered on baby food in the traditional sense. Given the inextricable link between the health of mothers and their baby, Clean Label Project Code of Practice: First 1,000 Day Promise Standard considers 'baby food' to be any food, supplement, consumer product, or ingredient destined to enter the supply chain of a product that is marketed toward pregnant women, infants, children, and lactating mothers.

The Clean Label Project Code of Practice: First 1,000 Day Promise Standard is inspired by the European Union regulations for formulas, baby foods, cereals and other product types by adopting certain pass/fail criteria for heavy metals in addition to other contaminants that have no place in foods, supplements, consumer products, and ingredients in products targeting mothers to be, infants, toddlers, children, and lactating mothers including mycotoxins, pesticides, phthalates, and more. By requiring more traditional food safety best practices like cGMP and Global Food Safety Initiative accredited audits in addition to routine surveillance sampling and testing, the Clean Label Project Code of Practice: First 1,000 Day Promise Standard looks to pick up where the US government food safety regulations currently stop and are in development and adopt precedent from the European Union to help brands better align with the expectations of parents and caregivers. The Clean Label Project Code of Practice: First 1,000 Day Promise Standard also incorporates US best practices and current and emerging state regulations, where applicable, to capture industrial and environmental contaminants that are of specific concern to vulnerable populations. Given that parental care and concern doesn't stop after the first 1,000 days, the Clean Label Project Code of Practice: First 1,000 Day Promise Standard is applicable for all ingredients, food, supplements and consumer products marketed towards infants, toddler, children, pregnant women, and lactating mothers. In addition to industrial and environmental contaminants and toxins, Clean Label Project Code of Practice: First 1,000 Day Promise Standard incorporates certain best practices when it comes to nutrition. Elements of the nutritional guidance and work of organizations like American Academy of Pediatrics and Partnership for a Healthy America have been incorporated within.

The purpose of the Code of Practice is to:

- A.** Provide a market tool and evaluation criteria for growers, suppliers, manufacturers, brand owners, and retailers to begin identifying, evaluating, and reducing contaminants/impurities within the infant, toddler, children, and pregnant women and lactating mothers' food, supplement, and consumer product supply chain.
- B.** Create a market opportunity for manufacturers looking to communicate this commitment to consumers.

- C. Satisfy the growing consumer demand for transparency through an on-package market solution inspired by established European regulations
- D. Create a certification standard with quality requirements for purity in addition to elements of nutritional best practices.
- E. Create a program that utilizes pass/fail criteria as opposed to benchmarked data, the cornerstone of Clean Label Project certification offerings, to serve as a catchall for product types that may fall outside of current Clean Label Project Purity Award scopes.

Where applicable, the Clean Label Project relies on domestic and international regulatory standards and tolerances as sources of inspiration.

## II. Scope

Growers, ingredient suppliers, manufacturers, co-manufacturers, brand owners, restaurants, and retailers are eligible to apply for the Clean Label Project Code of Practice: First 1,000 Day Promise Standard.

This Code of Practice outlines compliance documentation, supplier assurance, routine testing, and marketing requirements and guidelines.

The Clean Label Project Code of Practice: First 1,000 Day Promise Standard is applicable for all ingredients, food, supplements and consumer products marketed towards infants, toddler, children, pregnant women, and lactating mothers.

## III. Limitations

The contents of this document do require producing documentation demonstrating compliance to certain minimum applicable food safety standards and testing requirements. Certification to this Code of Practice does not constitute a guarantee of 100% of products are compliant to the stated limits. There is inherent variability in consumer-packaged goods batches, loads, and runs. However, QA programs that adhere to “best practices” should deliver high levels of consistency. There is a certain percentage error that is assumed using analytical chemistry instrumentation at low detection levels. These shall be accounted for during the compliance evaluation process.

## IV. References

<sup>1</sup> USDA National Organic Program <https://www.ams.usda.gov/rules-regulations/organic>

<sup>2</sup> Non-GMO Project Standard <http://www.nongmoproject.org/product-verification/the-standard>

<sup>3</sup> NSF Certified Gluten-free

<http://www.nsf.org/consumer-resources/what-is-nsf-certification/gluten-free-certification>

<sup>4</sup> Gluten-free Certification Organization <http://www.gfco.org/>

<sup>5</sup> Fair Trade USA <http://fairtradeusa.org/>

<sup>6</sup> California Proposition 65

<http://oehha.ca.gov/proposition-65/general-info/proposition-65-plain-language>

<sup>7</sup> Consumer Product Safety Commission <https://www.cpsc.gov/>

<sup>8</sup> FDA Food Safety Modernization Act

<http://www.fda.gov/Food/GuidanceRegulation/FSMA/default.htm>

<sup>9</sup> Global Food Safety Initiative <http://www.mygfsi.com/>

<sup>10</sup> Clean Label Project Baby Food Investigation <https://cleanlabelproject.org/baby-food-white-paper/>

<sup>11</sup> Hannah Gardener, Jaclyn Bowen, Sean P. Callan, Lead and cadmium contamination in a large sample of United States infant formulas and baby foods, Science of The Total Environment, Volume 651, Part 1, 2019, Pages 822-827, ISSN 0048-9697, <https://doi.org/10.1016/j.scitotenv.2018.09.026>

<sup>12</sup> Consumer Reports. Investigation into Heavy Metals in Baby Food  
<https://www.consumerreports.org/food-safety/heavy-metals-in-baby-food/>

<sup>13</sup> Healthy Babies. Bright Futures. Investigation into Heavy Metals in Baby Food  
<https://www.healthybabyfood.org/>

<sup>14</sup> Baby Food Safety Act 2021  
<https://www.congress.gov/bill/117th-congress/senate-bill/1019/text?r=1&s=4>

<sup>15</sup> FDA Closer to Zero  
<https://www.fda.gov/food/metals-and-your-food/closer-zero-action-plan-baby-foods>

<sup>16</sup> Regulation (EU) no. 609/2013 <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32013R0609>

<sup>17</sup> Regulation (EC) no. 178/2002  
<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32002R0178>

<sup>18</sup> Regulation (EC) no. No. 1881/2006  
<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:364:0005:0024:EN:PDF>

<sup>18</sup> CA Assembly Bill 652  
[https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=202120220AB652](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB652)

<sup>19</sup> CA Assembly Bill 1200  
[https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB1200](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1200)

<sup>20</sup> Analysis Of PFAS And TOF In Products  
<https://norden.divaportal.org/smash/get/diva2:1118439/FULLTEXT01.pdf>

<sup>21</sup> Total Fluorine Measurements in Food Packaging: How Do Current Methods Perform?  
<https://pubs.acs.org/doi/10.1021/acs.estlett.8b00700>

<sup>18</sup> AAP News. Added Sugar in Kids Diets: How Much is Too Much?  
<https://www.aappublications.org/news/2019/03/25/sugarpp032519>

<sup>19</sup> Report Links Synthetic Food Dyes to Hyperactivity and other Neurobehavioral Effects in Children  
<https://oehha.ca.gov/risk-assessment/press-release/report-links-synthetic-food-dyes-hyperactivity-and-other>

<sup>20</sup> Food Additives and Child Health. Leonardo Trasande, Rachel M. Shaffer, Sheela Sathyanarayana, COUNCIL ON ENVIRONMENTAL HEALTH Pediatrics Aug 2018, 142 (2) e20181410; DOI: 10.1542/peds.2018-1410

<sup>21</sup>Mennella JA, Reiter AR, Daniels LM. Vegetable and Fruit Acceptance during Infancy: Impact of Ontogeny, Genetics, and Early Experiences. *Adv Nutr.* 2016;7(1):211S-219S. Published 2016 Jan 15. doi:10.3945/an.115.008649

## V. Definitions

- A. Administrator: The organization(s) contractually responsible for the Clean Label Project Code of Practice: First 1,000 Day Promise Standard implementation and oversight.
- B. Certified: The product of an Operator that has been formally recognized by the Administrator as fulfilling the requirements as outlined in the Clean Label Project Code of Practice: First 1,000 Day Promise Standard.
- C. Compliant: Systems, paperwork, and test results for a product found by the Administrator to be aligned with the Clean Label Project Code of Practice: First 1,000 Day Promise Standard.
- D. Follow-on formulae: Food used by infants when appropriate complementary feeding is introduced and constituting the principal liquid element in a progressively diversified diet of such infants.
- E. Infants: Children under the age of 12 months.
- F. Infant Formulae: Food used by infants during the first months of life and satisfying by themselves the nutritional requirements of such infants until the introduction of appropriate complementary feeding.



- G. Non-Compliant: Nonconformance to established requirements within the Clean Label Project Code of Practice: First 1,000 Day Promise Standard.
- H. Operator: The organization, business, entity, or person(s) responsible for Clean Label Project Code of Practice: First 1,000 Day Promise Standard compliance oversight.
- I. Other Product Types: Products included under the scope in Section I and Section II but not specifically called out/detailed out in the "Product Types" column of Section VIII.
- J. Process cereal baby-food and baby foods: Food intended for use by infants when they are weaned and by young children as a supplement to their diet and/or for their progressive adaptation to ordinary food.
- K. Young children: Children aged between 1 and 3 years.

## VI. Compliance Framework

### A. **Initial Compliance Requirements**

#### 1. **Proof of Food Safety/Good Manufacturing Practices (GMP) Compliance**

Food safety and/or good manufacturing audits are now a normal and necessary component within the food and consumer product supply chain. An Operator shall provide proof of food safety or GMP compliance. Examples of food safety compliance include, but are not limited to, proof of certification under a Global Food Safety Initiative benchmarked standard or proof of compliance to other third-party specified food safety or GMP standards.

Standards such as USDA National Organic Program, Kosher, or another food quality/marketing standards, shall not be deemed sufficient.

Proof of Food Safety/GMP Compliance documentation shall be dated within the past 18 months. The location listed on the Proof of Food Safety Compliance documentation shall match the location of product manufacture disclosed on application documentation. If an Operator uses multiple co-packers or co-manufacturers, proof of food safety shall be supplied for each location.

Disclosure of a recall or any governmental inquiry such as California government inquiry into California Proposition 65 compliance shall be disclosed.

#### 2. **Product Specifications**

The purpose of creating a product specification is to clearly define the requirements of a final product. Strictly following product specifications is necessary to control the quality, safety, and consistency of products. Food product specifications can include information like allergens, Brix, ingredients, and other general and specific requirements as well as acceptable performance requirements. Other consumer packaged goods product specifications may include pH, viscosity, color, odor and other general and specific requirements as well as acceptable performance requirements.

Product Specifications for each product seeking Clean Label Project Code of Practice: First 1,000 Day Promise Standard certification shall be provided to the Administrator. The specifications shall be reviewed to ensure provisions for compliance with Section VIII.

### **3. Established Standard Operating Procedure for Supplier Testing**

The purpose of a Supplier Quality Assurance Program is to ensure a supplier's ability to deliver on a good or service that will satisfy the customer's needs. A Supplier Quality Assurance Program can be an effective means to control the quality of incoming products or materials and ensure the products meet necessary specifications.

To ensure ongoing compliance to the Clean Label Project Code of Practice: First 1,000 Day Promise Standard, Operators shall have a Standard Operating Procedure in place to specify if:

1. The Operator will have the supplier perform compliance testing and/or;
2. The Operator will perform independent testing as a condition of accepting the incoming material or in recognition that the finished product must comply with maximum tolerance levels as established by the Clean Label Project Code of Practice: First 1,000 Day Promise Standard.

The Standard Operating Procedure shall include provisions for situations including at least one of the following:

1. An Operator may elect to perform routine testing on all new and current suppliers;
2. An Operator may elect to utilize a risk assessment to identify high risk ingredients or suppliers to minimize costs and optimize testing efficiency;
3. An Operator may choose to do independent testing for some suppliers, and allow other suppliers to perform their own testing and supply the test results.

### **4. Proof of Finished Product Test Compliance**

Finished product testing is at the foundation of the Clean Label Project Code of Practice: First 1,000 Day Promise Standard.

All products seeking Clean Label Project Code of Practice: First 1,000 Day Promise Standard certification shall pass a test to ensure compliance to the Clean Label Project tolerances established in Section VIII.

Brands may elect to perform and supply proof of finished product testing to the Administrator for each product seeking Clean Label Project Code of Practice: First 1,000 Day Promise Standard certification. In such situations, the Operator shall request Administrator to approve the intended laboratory to be used in writing. The Operator shall review the request and respond in writing. All testing shall conform with the requirements outlined in Section VIII.

Alternatively, brands may elect the Administrator to perform or coordinate finished product testing. In either case, consistent with Section VII.C, random unannounced surveillance sampling and testing should be performed by the Administrator.

1. **Bracketing:** In some cases, test bracketing may be utilized. Bracketing is the concept of using a representative sample (in many cases, the worst-case scenario) for the purpose of identifying a sample whose test result may be representative of multiple products. Bracketing options shall be evaluated on a case-by-case basis and shall include an assessment by the Technical Administrator of the following:
  - a. A comparison of the base formulations for the sample set;
  - b. An evaluation of internal testing procedures;
  - c. A comparison of the product's specifications;
  - d. An Operator's track record of continued compliance with this Code of Practice;
2. The Operator shall complete an affidavit attesting to the formulation base and inform the Technical Administrator if there are any changes to the product formulation that may increase the variability in the formulation compared to the sample set;
3. In instances where the Operator is white labeling, co-manufacturing or making a product in multiple sizes, this section shall apply.
4. The Technical Administrator may charge an additional fee for the administration of the certification and bracketing process.
5. A request for an Operator to utilize bracketing shall be provided in writing to the Administrator. The Administrator shall respond to the request in writing.

## 5. Product type

Section VIII of the Clean Label Project Code of Practice: First 1,000 Day Promise Standard details the tolerances for a variety of industrial and environmental contaminants. The tolerances may vary depending on product type.

During the application process, the Operator shall specify which category it believes that it belongs in as well as the tests that may or may not be applicable as listed in Section VIII. The Administrator shall review and approve in writing the mutually agreed upon product type for purposes of test result tolerances.

## 6. Ingredient Risk Assessment

As part of the application process, the brand shall complete an ingredient risk assessment. The ingredient risk assessment shall include:

1. A list of all products seeking certification to Clean Label Project Code of Practice: First 1,000 Day Promise Standard;

2. A list of all of the ingredients of each product seeking certification to the Clean Label Project Code of Practice: First 1,000 Day Promise Standard;
3. An evaluation of whether each ingredient is of high, medium, or low risk for the contaminants categories outlined in Section VIII;
4. A manufacturer/brand created overview of how they define high, medium, or low risk.

#### **7. Processing/Packaging Risk Assessment**

As part of the application process, the brand shall complete a packaging/processing risk assessment. The packaging/processing risk assessment shall include:

1. A list of all products seeking certification to Clean Label Project Code of Practice: First 1,000 Day Promise Standard;
2. A list of all of the packaging used in the finished product seeking certification to the Clean Label Project Code of Practice: First 1,000 Day Promise Standard;
3. A list of all major processing steps used to create each product seeking certification to the Clean Label Project Code of Practice: First 1,000 Day Promise Standard;
4. An evaluation of whether each component of the packaging is of high, medium, or low risk for the contaminants categories outlined in Section VIII;
5. An evaluation of whether each processing step is of high, medium, or low risk for the contaminants categories outlined in Section VIII;
6. A manufacturer/brand created overview of how they define high, medium, or low risk for processing and packaging.

#### **8. Inclusion of High- Risk Products in Hazard Analysis and Critical Control Point (HACCP) & Hazard Analysis and Risk-based Preventative Controls (HARPC) analysis**

For any product with an ingredient, processing step, or packaging component that is identified as high-risk, this product shall have a control in place and outlined in the brand/manufacturers HACCP and/or HARPC analysis.

#### **9. Documentation of Regulatory Compliance**

For any product under the scope of USDA Food Safety Inspection Service or for a product that is an Infant Formula, formal documentation of regulatory compliance for that product shall be provided.

#### **10. Nutritional Analysis**

The brand/manufacturer may submit necessary documentation to substantiate nutrition compliance as outlined in Appendix II.

### **B. Renewal/Ongoing Compliance**

All requirements outlined in Section VI. A are applicable during the renewal process. However, it should be noted that the Administrator of the Clean Label Project shall perform testing at the Operator's expense. It is recommended that the Operator perform routine finished product testing to ensure ongoing compliance with the Clean Label Project Code of Practice: First 1,000 Day Promise Standard.

The Administrator of the Clean Label Project shall annually confirm proof of compliance with Section VI. A.

It should be noted that the Clean Label Project Code of Practice: First 1,000 Day Promise Standard is a living document. The requirements and scope of testing will be revisited on a regular basis and proactively communicated to Operators. Operators shall be provided with a minimum of 1-year implementation period when changes are made to the Clean Label Project Code of Practice: First 1,000 Day Promise Standard.

## **VII. Administrator Requirements**

### **A. Testing and Formulation Review Requirements**

1. The Administrator of the Clean Label Project shall provide oversight of the testing associated with Clean Label Project - First 1,000 Day Promise Award compliance as outlined in VI.A.4 and Section VIII. The Administrator of the Clean Label Project shall review necessary formulation and batch records associated with Clean Label Project - First 1,000 Day Promise Award compliance as outlined in VIII.
2. The Administrator shall perform random and unannounced surveillance sampling and testing of products. The Administrator may utilize a random or risk-based sampling and testing approach. The cost of sampling and testing shall be borne by the Operator.
3. The Administrator shall inform Operators of their respective test results. If the Administrator tests a product resulting in a non-compliant test result (deemed as greater than 30% of the established limit), the Administrator shall inform the Operator in writing of the test results. To continue to comply with the Clean Label Project Code of Practice: First 1,000 Day Promise Standard, the Operator shall perform a root cause analysis to determine the source of the non-compliant test result within 30 days of the non-compliant test result. This root cause analysis and corrective action plan shall be supplied to the Administrator in writing. The Administrator shall review the root cause analysis and corrective action plan and determine if acceptable. If not deemed acceptable by the Administrator, the Operator may be at risk of additional adverse action, up to but not limited to product certification revocation. The Operator should expect additional administrative surveillance of this product.

Note I: During the course of testing, if the Administrator identifies a possible violation of state or federal regulations, the Operator may be notified of this possible violation in writing. Independent of Clean Label Project certification

compliance, the onus is on the Operator to ensure compliance with all local, state, federal, and international statutes

Note II: In the event that the Administrator identifies a possible violation of state or federal regulations, additional testing may be required by the Administrator. Additionally, the product may be identified as high risk and necessitate additional lot testing to ensure ongoing compliance. These instances shall be evaluated on a case-by-case basis.

4. Test results may be used to substantiate compliance for other Clean Label Project Code of Practice certifications.
5. In the event of a non-compliant test result, the Administrator reserves the right to perform increased surveillance testing on the product and brand to ensure ongoing compliance with the Clean Label Project Code of Practice: First 1,000 Day Promise Standard requirements. The cost of this testing shall be borne by the Operator. The Operator may elect to perform increased surveillance testing on the ingredient/supplier in question.
6. The Clean Label Project Code of Practice: First 1,000 Day Promise Standard encourages the use of laboratories using SPIFAN methods.

## **B. Accreditation Requirements**

1. The Administrator shall ensure that any laboratory used maintains ISO 17025 laboratory accreditation to ensure test result accuracy, consistency, team member training and best practice. The accreditation shall include applicable testing scopes relevant to the test battery, matrix, and sensitivity.
2. Any laboratories used shall remain in good standing with their ISO 17025 accreditation.
3. Any laboratory requested to be used not having ISO 17025 accreditation with the applicable testing scope relevant to the test battery, matrix, and sensitivity in question, shall be evaluated on a case-by-case basis by the Administrator. Any laboratory used shall meet the necessary minimum level of detection / level of quantification needed to confirm compliance in accordance with Section VIII.
4. The Administrator shall comply with ISO 17065, effective January 2024.
5. If a third-party laboratory is utilized, the Technical Administrator shall be listed as the entity receiving the test results directly from the third-party laboratory.

## **C. Sampling Requirements**

1. The Administrator should sample products by simulating the consumer shopping experience. The Administrator shall procure enough sample to fulfill testing needs. This may only require that one sample be selected for testing.

2. The consumer shopping experience: The Administrator shall ideally procure samples through local or online retailers. If not feasible, in extreme circumstances the Administrator may procure surveillance samples from the Operator's website or the Operator. In that specific circumstance, the sample provided by the Operator must be in a finished sealed (unopened) package that would be sold at retail. The cost of the samples shall be borne by the Operator.
3. Where applicable and feasible, laboratories shall prepare/dilute samples in accordance with Operator packaging instructions.
4. The Administrator shall retain a picture of the product purchased, the lot number, and the receipt that shows the date, location, and retail of purchase. This information shall be provided to the Operator for purposes of root cause analysis, investigations, and continuous improvement.
5. In the initial year of certification, all products seeking certification should be procured by The Administrator to facilitate the testing process in accordance with Section VII B Accreditation Requirements and Section VII C.2.

#### **D. Marketing Compliance Requirements**

1. The Administrator shall be responsible for maintaining and publishing the list of all products bearing the Clean Label Project Code of Practice: First 1,000 Day Promise Standard Certification Mark on the Clean Label Project website.
2. Any product not meeting the requirements outlined in the Clean Label Project Code of Practice Sections VI.A, VI.B, or preventing the Administrator from fulfilling its requirements outlined in VII, or VIII it shall be found to be non-compliant with the Clean Label Project Code of Practice: First 1,000 Day Promise Standard and issued a Non-Compliance.
3. In the event that a Non-Compliance goes unmitigated in excess of 90 days, the Clean Label Project will remove the product from the online listing and issue a notification that the product has been dropped from listing. Additional adverse action may be executed if the Operator continues to use the Clean Label Project certification mark on the dropped product.
4. The Administrator shall confirm the Operator's compliance to the Mark Use Requirements outlined in the Brand Standard.

#### **E. Other Requirements**

1. In the process of ensuring compliance to the Clean Label Project Code of Practice: First 1,000 Day Promise Standard the Clean Label Project provides necessary authority to the Administrator to require additional testing, surveillance, or documentation requests as deemed necessary.
2. The Administrator shall maintain strict confidentiality of all Operator's documentation and test reports.

3. Clean Label Project reserves the right to conduct an audit of the Administrator’s oversight of the Clean Label Project Code of Practice: First 1,000 Day Promise Standard compliance.
4. In the event that the Administrator identifies fraudulent or egregious violations of this standard the Administrator reserves the right for immediate certification revocation for the entire operation and any and all products under the scope of certification.

**F. Request for Deviation**

Any request for deviation/variances to requirements of the Standard shall be provided in writing to the Technical Administrator.

Only extreme instances or Force Majeure shall request for deviation be made and subsequently considered.

The Technical Administrator in consultation with Clean Label Project, shall consider but is not obligated to grant the request for deviation and shall not be obligated to return any portion of fees paid if the Operator chooses to discontinue certification as a result of the request for deviation decision.

Requested variances shall be considered on a case-by-case basis.

Operators shall provide a written request to the Technical Administrator documenting the situation and proposed course of action for approval.

The Technical Administrator, in consultation with the Clean Label Project, shall produce a written response back to the Applicant/ Operator regarding the request for deviation within 10 business days.

**VIII. Testing Requirements**

**A. Physical and Chemical Analyses Maximum Tolerances**

Mycotoxins	<i>Applicable for products containing grains or nut-based ingredients</i>	
	Product Types	Tolerances (ppb or ppm)
<b>Aflatoxin</b>	Processed cereal-based foods and baby foods for infants and young children	0.10 ppb
	Infant formula and follow-on formula, including infant milk and follow-on milk	0.025 ppb
	Dietary foods for special medical purposes intended specifically for infants	0.010 ppb
	Other product types <sup>1</sup>	0.10 ppb
	<b>Ochratoxin A</b>	All applicable product types
<b>Patulin</b>	All applicable product types	10 ppb
<b>Deoxynivalenol</b>	All applicable product types	200 ppb



<b>Zearalenone</b>	Processed cereal-based foods and baby foods for infants and young children	20 ppb
	Processed maize-based foods for infants and young children	20 ppb
	Other product types	20 ppb
<b>Fumonisin</b>	Processed maize-based foods and baby foods for infants and young children	200 ppb
	Other product types	200 ppb

<b>Heavy Metals</b>	<b><i>Applicable for all products unless specifically excluded</i></b>	
	<b>Product Types</b>	<b>Tolerances</b>
<b>Lead<sup>1</sup></b>	Infant formula and follow-on formula and young child formula (marketed as powder)	20 ppb
	Infant formula and follow-on formula and young child formula (marketed as liquid)	10 ppb
	Processed cereal-based foods and baby foods for infants and young children	20 ppb
	Foods for special medical purposes intended specifically for infants and young children (marketed as powder)	20 ppb
	Foods for special medical purposes intended specifically for infants and young children (marketed as liquid)	10 ppb
	Drinks for infants and young children labelled and sold as such marketed as liquids or to be reconstituted following instructions of the manufacturer including fruit juices	20 ppb
	Drinks for infants and young children to be prepared by infusion or decoction	50 ppb
	Other product types	50 ppb
<small><sup>1</sup> <a href="https://eur-lex.europa.eu/eli/reg/2021/1317/oj">https://eur-lex.europa.eu/eli/reg/2021/1317/oj</a></small>		
<b>Cadmium</b>	Powdered formula manufactured from cows' milk proteins or protein hydrolysates	10 ppb
	Liquid formula manufactured from cows' milk proteins or protein hydrolysates	5 ppb
	Powdered formula manufactured from soy protein isolates, alone or in a mixture with cows' milk proteins	20 ppb
	Liquid formula manufactured from soy protein isolates, alone or in a mixture with cows' milk proteins	10 ppb
	Processed cereal-based foods and baby foods for infants and young children	40 ppb
	Other product types	40 ppb
<b>Mercury</b>	All product types	Variable <sup>1</sup>
	<small><sup>1</sup> <a href="https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:364:0005:0024:EN:PDF">https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:364:0005:0024:EN:PDF</a></small>	

<b>Inorganic Arsenic</b>	<b><i>Applicable for products with rice-based ingredients</i></b>	
	Rice destined for the production of food for infants and young children	100 ppb
	Other product types	100 ppb
<b>Tin</b>	<b><i>All product types</i></b>	
	Canned baby foods and processed cereal-based foods for infants and young children, excluding dried and powdered products	50 ppm
	Canned infant formulae and follow-on formulae (including infant milk and follow-on milk), excluding dried and powdered products	50 ppm
	Canned dietary foods for special medical purposes intended specifically for infants, excluding dried and powdered products	50 ppm
	Other product types	50 ppm

<b>Nitrates</b>	<b><i>Applicable for processed cereal-based foods</i></b>	
	<b>Product Types</b>	<b>Tolerances</b>
	Processed cereal-based foods and baby foods for infants and young children	200 ppm
	Other product types	200 ppm

<b>Melamine &amp; Structural Analogues</b>	<b><i>Applicable for formulas</i></b>	
	<b>Product Types</b>	<b>Tolerances</b>
	Food with the exception of infant formula and follow-on formula	2.5 ppm
	Powdered infant formula and follow-on formula	1 ppm
	Other product types	2.5 ppm

<b>Pesticide Residues</b>	<b><i>Applicable for all products<sup>1</sup></i></b>	
	<b>Product Types</b>	<b>Tolerances</b>
	Baby formula, processed cereal-based foods and baby foods	0.01 ppm or 10 ppb for ANY pesticide
	Other product types	10 ppb for any pesticide
	<small><sup>1</sup> <a href="https://ec.europa.eu/food/safety/labelling-and-nutrition/specific-groups/food-infants-and-young-children_en">https://ec.europa.eu/food/safety/labelling-and-nutrition/specific-groups/food-infants-and-young-children_en</a></small>	

<b>Polycyclic Aromatic Hydrocarbons</b> Benzo(a)pyrene Benz(a)anthracene	<b><i>Applicable for all products<sup>1</sup></i></b>	
	<b>Product Types</b>	<b>Tolerances</b>
	Processed cereal-based foods and baby foods for infants and young children	1 ppb

Benzo(b)fluoranthene Chrysene	Infant formulae and follow-on formulae, including infant milk and follow-on milk	1 ppb
	Dietary foods for special medical purposes (9) (29) intended specifically for infants	1 ppb
	Other product types	1 ppb
<sup>1</sup> <a href="https://www.legislation.gov.uk/eur/2006/1881">https://www.legislation.gov.uk/eur/2006/1881</a>		

<b>Packaging &amp; Processing Contaminants</b>	<b><i>Applicable for all products</i></b>	
BPA	All product types	<30 ppb
Phthalates	<b>Product Types</b>	<b>Tolerances</b>
Bbp*	All product types	≤ 30 ppm
Dbp*	All product types	≤ 0.3 ppm
Dehp*	All product types	≤ 1.5 ppm
Didp*	All product types	≤ 9 ppm (Dinp + Didp)
Dinp*	All product types	≤ 9 ppm (Dinp + Didp)
Dap	All product types	Not Detected (≤ 0.01 ppm)
<small>*≤ 60 Mg/Kg As Part Of Group Restriction Number 32 For Total Specific Migration Limit</small>		
<b>PFAS<sup>1</sup></b>	<b><i>Applicable for all products</i></b>	
	All product types	100 ppm
	<sup>1</sup> This requirement is effective July 1, 2024 aligning with CA 65218 and 120019. The rationale is that the methods used for testing are still in development. Based on published testing results, there is little correlation between PFAS concentrations in consumer products obtained using conventional methods and total organic fluorine methods. <sup>20, 21</sup>	

<b>Acrylamide<sup>1</sup></b>	<b><i>Applicable for fried or carbohydrate-dense products</i></b>	
	Cereal-based baby food	40 ppm
	Other product types	40 ppm
<small><sup>1</sup>The State of California Prop 65 is a stricter standard. See section IV and VI.A.1 for more details.</small>		

<b>Microbiological Analyses<sup>1</sup></b>	<b><i>Applicable for all products</i></b>	
	All product types	Variable
	<sup>1</sup> Operator shall provide internal specifications complete with assay list, method of testing, and test reports to demonstrate internal microbiological testing operator procedures.	

**B. Current Analytical Equipment Requirements**

Assay	Analytes	Equipment
Heavy Metals Panel	Arsenic, Cadmium, Lead, Mercury	ICP-MS

Pesticides Screen	Variety <sup>1</sup>	LC-MSMS
BPA/BPS	BPA, BPS	LC-MSMS
Phthalates Panel	Benzyl Butyl, Dibutyl, Dihexyl, Bis (2-ethylhexyl)	GC-MSMS LC-MSMS
Mycotoxins	Aflatoxin G2, Aflatoxin G1, Aflatoxin B2, Aflatoxin B1, Ochratoxin A	LC-MSMS
Acrylamide	Acrylamide	LC-MSMS
Melamine & Analogues	Melamine, Cyanuric Acid, Ammeline, Ammelide	LC-MSMS
Glyphosate	Glyphosate	LC-MSMS

**VIII. Marketing Compliance Requirements**

1. The Administrator shall be responsible for maintaining and publishing the list of all products bearing the Clean Label Project Certification Mark on the Clean Label Project website.
2. Any product not meeting the requirements outlined in the Clean Label Project Code of Practice or preventing the Administrator from fulfilling its requirements outlined in VII shall be found to be non-compliant with the Clean Label Project Code of Practice: First 1,000 Day Promise Standard and issued a Non-Compliance.
3. In the event that a Non-Compliance goes unmitigated in excess of 90 days, the Clean Label Project will remove the product from the online listing and issue a notification that the product has been dropped from listing. Additional adverse action may be executed if the Operator continues to use the Clean Label Project certification mark on the dropped product.
4. The Administrator shall confirm the Operator’s compliance to the Mark Use Requirements outlined in the Brand Standard.
5. Logos available for use

Brands shall procure the formal high-resolution jpeg and images from Clean Label Project or its Technical Administrator for use in its marketing materials, presentations, and packaging. Only products that are listed on the Operator’s Clean Label Project certificate shall be permitted to use the applicable Clean Label Project logo. Any questions regarding the colors, size, or to request deviations from the specified logos shall be requested in writing to the Clean Label Project Technical Administrator.

- Clean Label Project 1,000 Day Promise Mark



The Clean Label Project Certification mark may appear in single-color or reversed-out white when placed on complicated backgrounds where a high-contrast read of the seal is challenging. Request for the white on black and color logo options from the Clean Label Project Technical Administrator.

#### 6. Mark Placement Requirements

The Clean Label Project Certification mark shall be placed on the front or back of the product packaging. There are many instances where the award needs to be placed alongside other logos. We request that the Clean Label Project Certification mark stay within the clear space minimum size requirements.

#### 7. Optional Supporting Clean Label Project Certification Mark Copy

Brands may elect to use romance language on packaging or website to explain their Clean Label Project Certification mark. If a brand would like to add romance language, it is suggested that the draft language be shared with Clean Label Project or its Technical Administrator in advance of printing packaging.

**Appendix I: Default Pesticide Panel**

<b>Analyte</b>	<b>Equipment</b>
2-Phenylphenol	GC-MSMS
3-Hydroxycarbofuran	LC-MSMS
Acephate	LC-MSMS
Acetamiprid	LC-MSMS
Aclonifen	GC-MSMS
Acrinathrin	GC-MSMS
Alachlor	GC-MSMS
Aldicarb	LC-MSMS
Aldicarb Sulfoxide	LC-MSMS
Aldrin	GC-MSMS
Allethrin	GC-MSMS
Ametryn	LC-MSMS
Anthraquinone	GC-MSMS
Atrazine	LC-MSMS
Avermectin B1A NH4+	LC-MSMS
Azaconazole	LC-MSMS
Azinphos-Ethyl	LC-MSMS
Azoxystrobin	LC-MSMS
Benalaxyl	LC-MSMS
Benfluralin	GC-MSMS
Benthiavalicarb-Isopropyl	LC-MSMS
BHC-alpha	GC-MSMS
BHC-beta	GC-MSMS
BHC-delta	GC-MSMS
BHC-gamma (Lindane, gamma HCH)	GC-MSMS
Binapacryl	GC-MSMS
Bioresmethrin	LC-MSMS
Biphenyl	GC-MSMS
Bitertanol	LC-MSMS
Boscalid	LC-MSMS
Bromacil	LC-MSMS
Bromocyclen	GC-MSMS
Bromophos	GC-MSMS
Bromophos-ethyl	GC-MSMS
Bromopropylate	GC-MSMS
Bromoxynil	LC-MSMS
Bupirimate	LC-MSMS
Buprofezin	LC-MSMS

Butralin	LC-MSMS
Cadusafos	LC-MSMS
Captafol	GC-MSMS
Captan	GC-MSMS
Carbaryl	LC-MSMS
Carbendazim	LC-MSMS
Carbetamide	LC-MSMS
Carbofuran	LC-MSMS
Carbophenothion	GC-MSMS
Carbophenothion-Methyl	GC-MSMS
Carboxin	LC-MSMS
Chlorantraniliprole	LC-MSMS
Chlorbenside	GC-MSMS
Chlordane-cis	GC-MSMS
Chlordane-oxy	GC-MSMS
Chlordane-trans	GC-MSMS
Chlorfenapyr	GC-MSMS
Chlorfenprop-methyl	GC-MSMS
Chlorfenson	GC-MSMS
Chlorfenvinphos	LC-MSMS
Chloroneb	GC-MSMS
Chloropropylate	GC-MSMS
Chlorothalonil	GC-MSMS
Chlorotoluron	LC-MSMS
Chloroxuron	LC-MSMS
Chlorpropham	GC-MSMS
Chlorpyrifos	GC-MSMS
Chlorpyrifos-methyl	GC-MSMS
Chlorthion	GC-MSMS
Chlorthiophos	GC-MSMS
Chlozolinate	GC-MSMS
cis-1,2,3,6-Tetrahydrophthalimide	GC-MSMS
Clodinafop-Propargyl Ester	LC-MSMS
Clofentezine	LC-MSMS
Clopyralid	LC-MSMS
Cloquintocet-1-Methylhexyl Ester	LC-MSMS
Clothianidin	LC-MSMS
Coumaphos	GC-MSMS
Crimidine	LC-MSMS
Cyanazine	LC-MSMS
Cyanofenphos	GC-MSMS
Cyanophos	GC-MSMS
Cycloate	LC-MSMS

Cycloxydim	LC-MSMS
Cyfluthrin (Total, 4)	GC-MSMS
Cyhalothrin (Lambda)	GC-MSMS
Cymiazole	GC-MSMS
Cypermethrin (Total, 4)	GC-MSMS
Cyprodinil	LC-MSMS
Daminozide	LC-MSMS
DCPA (Dacthal, Chlorthal-dimethyl)	GC-MSMS
DDD-o,p'	GC-MSMS
DDD-p,p'	GC-MSMS
DDE-o,p'	GC-MSMS
DDE-p,p'	GC-MSMS
DDT-o,p'	GC-MSMS
DDT-p,p'	GC-MSMS
DEET	LC-MSMS
Deltamethrin II {CAS # 52918-63-5}	GC-MSMS
Demeton-S-Methyl	LC-MSMS
Demeton-S-Methyl Sulfone	LC-MSMS
Desmetryne	LC-MSMS
Diaphenthiuron	LC-MSMS
Diallate (Total)	LC-MSMS
Diazinon	GC-MSMS
Dibromobenzophenone, 4,4'-	GC-MSMS
Dichlofenthion	GC-MSMS
Dichlofluanid	GC-MSMS
Dichloran	GC-MSMS
Dichlorobenzonitrile, 2,6-	GC-MSMS
Dichlorvos	LC-MSMS
Dicofol, p, p'-	GC-MSMS
Dicrotofos	GC-MSMS
Dieldrin	GC-MSMS
Diethofencarb	LC-MSMS
Difenoconazole	LC-MSMS
Diflubenzuron	LC-MSMS
Diflufenican	GC-MSMS
Dimethoate	LC-MSMS
Diniconazole	LC-MSMS
Dinitramine	GC-MSMS
Dinobuton	GC-MSMS
Dinoseb	LC-MSMS
Dinotefuran	LC-MSMS
Dioxathion	GC-MSMS
Diphenamid	LC-MSMS



Diphenylamine	LC-MSMS
Dipropetryn	GC-MSMS
Disulfoton	LC-MSMS
Disulfoton Sulfone	LC-MSMS
Disulfoton-Sulfoxide	LC-MSMS
Ditalimfos	GC-MSMS
Diuron	LC-MSMS
DMST (Tolyfluanid metabolite)	GC-MSMS
Dyrene	LC-MSMS
Edifenphos	GC-MSMS
Emamectin B1A	LC-MSMS
Endosulfan I (alpha isomer)	GC-MSMS
Endosulfan sulfate	GC-MSMS
Endrin	GC-MSMS
Endrin ketone	GC-MSMS
EPN	GC-MSMS
Epoxiconazole	LC-MSMS
EPTC	LC-MSMS
Ethalfuralin	GC-MSMS
Ethiofencarb	LC-MSMS
Ethiofencarb Sulfoxide	LC-MSMS
Ethion	GC-MSMS
Ethiprole	LC-MSMS
Ethirimol	LC-MSMS
Ethofenprox	GC-MSMS
Ethylan	GC-MSMS
Etoxazole	LC-MSMS
Etridiazole	GC-MSMS
Famphur	GC-MSMS
Fenamidone	LC-MSMS
Fenamiphos	LC-MSMS
Fenamiphos Sulfone	LC-MSMS
Fenamiphos-Sulfoxide	LC-MSMS
Fenarimol	LC-MSMS
Fenazaquin	LC-MSMS
Fenbuconazole	LC-MSMS
Fenhexamid	LC-MSMS
Fenitrothion	GC-MSMS
Fenoxaprop-P	LC-MSMS
Fenpropimorph	LC-MSMS
Fenpyroximate	LC-MSMS
Fenson	GC-MSMS
Fensulfothion	GC-MSMS

Fenthion	LC-MSMS
Fenthion Oxon	LC-MSMS
Fenthion-Sulfone	LC-MSMS
Fenvalerate (Total, 2)	GC-MSMS
Fipronil	LC-MSMS
Flamprop-isopropyl	GC-MSMS
Flamprop-M-Isopropyl	LC-MSMS
Fluazifop	LC-MSMS
Fluazifop-P-Butyl	LC-MSMS
Flubenzimine	GC-MSMS
Fluchloralin	GC-MSMS
Flucythrinate (Total, 2)	GC-MSMS
Fludioxonil	LC-MSMS
Flufenacet	LC-MSMS
Fluopicolide	LC-MSMS
Fluopyram	LC-MSMS
Fluquinconazole	LC-MSMS
Flurprimidol	LC-MSMS
Flusilazole	LC-MSMS
Fluthiacet-Methyl	LC-MSMS
Flutriafol	LC-MSMS
Fluvalinate-tau I	GC-MSMS
Fluvalinate-tau II {CAS # 102851-06-9}	GC-MSMS
Fonofos	LC-MSMS
Forchlorfenuron	LC-MSMS
Formothion	GC-MSMS
Fosthiazate	LC-MSMS
Fuberidazole	LC-MSMS
Furalaxyl	LC-MSMS
Furathiocarb	GC-MSMS
Halfenprox	GC-MSMS
Haloxifop (Free Acid)	LC-MSMS
Heptachlor	GC-MSMS
Heptachlor endo-epoxide	GC-MSMS
Heptachlor exo-epoxide	GC-MSMS
Heptenophos	GC-MSMS
Hexachlorobenzene	GC-MSMS
Hexaconazole	LC-MSMS
Hexazinone	LC-MSMS
Hexythiazox	LC-MSMS
Icaridin	LC-MSMS
Imazalil	LC-MSMS
Imidacloprid	LC-MSMS

Indoxacarb	LC-MSMS
Iodofenphos	GC-MSMS
Iprobenfos	GC-MSMS
Iprodione	GC-MSMS
Iprovalicarb	LC-MSMS
Isazofos	GC-MSMS
Isobenzan	GC-MSMS
Isocarbophos	GC-MSMS
Isodrin	GC-MSMS
Isofenphos	LC-MSMS
Isoprocarb	LC-MSMS
Isoprocarb I	GC-MSMS
Isopropalin	LC-MSMS
Isoprothiolane	GC-MSMS
Isoproturon	LC-MSMS
Isoxathion	GC-MSMS
Kresoxim-Methyl	LC-MSMS
Lenacil	LC-MSMS
Leptophos	GC-MSMS
Linuron	LC-MSMS
Malaoxon	LC-MSMS
Malathion	LC-MSMS
Mandipropamid	LC-MSMS
Mecarbam	LC-MSMS
Mepanipyrim	LC-MSMS
Mepronil	LC-MSMS
Metalaxyl	LC-MSMS
Metamitron	LC-MSMS
Metazachlor	LC-MSMS
Methabenzthiazuron	LC-MSMS
Methacrifos	GC-MSMS
Methamidophos	LC-MSMS
Methidathion	GC-MSMS
Methomyl	LC-MSMS
Methoprotryne	GC-MSMS
Methoxychlor olefin	GC-MSMS
Methoxyfenozide	LC-MSMS
Metobromuron	LC-MSMS
Metolachlor	LC-MSMS
Metrafenone	LC-MSMS
Metribuzin	LC-MSMS
Mevinphos, E-	GC-MSMS
Mirex	GC-MSMS

Molinate	LC-MSMS
Monocrotophos	GC-MSMS
Monolinuron	LC-MSMS
Myclobutanil	LC-MSMS
Napropamide	LC-MSMS
Neburon	LC-MSMS
Nitenpyram	LC-MSMS
Nitralin	GC-MSMS
Nitrapyrin	GC-MSMS
Nitrofen	GC-MSMS
Nitrothal-isopropyl	GC-MSMS
Nonachlor, trans-	GC-MSMS
Norflurazon	LC-MSMS
Nuarimol	LC-MSMS
Octachlorodipropyl ether	GC-MSMS
Ofurace	LC-MSMS
Omethoate	LC-MSMS
Oxydemeton Methyl	LC-MSMS
Oxyfluorfen	GC-MSMS
Paraoxon	GC-MSMS
Paraoxon-methyl	GC-MSMS
Parathion	GC-MSMS
Parathion-methyl	GC-MSMS
Pebulate	GC-MSMS
Penconazole	LC-MSMS
Pencycuron	LC-MSMS
Pendimethalin	GC-MSMS
Pentachloroaniline	GC-MSMS
Pentachloroanisole	GC-MSMS
Pentachlorobenzene	GC-MSMS
Pentachloronitrobenzene	GC-MSMS
Pethoxamid	LC-MSMS
Phenthoate	GC-MSMS
Phorate sulfone	GC-MSMS
Phosalone	GC-MSMS
Phosmet	GC-MSMS
Phosphamidon	GC-MSMS
Phosphamidon I	GC-MSMS
Picolinafen	GC-MSMS
Picoxystrobin	LC-MSMS
Piperonyl butoxide	GC-MSMS
Pirimicarb-Desmethyl	LC-MSMS
Pirimiphos-Ethyl	LC-MSMS

Pirimiphos-methyl	GC-MSMS
Prochloraz	LC-MSMS
Procymidone	GC-MSMS
Profenofos	GC-MSMS
Profluralin	GC-MSMS
Profoxydim-Lithium	LC-MSMS
Promecarb	LC-MSMS
Pronamide	LC-MSMS
Propachlor	GC-MSMS
Propamocarb	LC-MSMS
Propanil	GC-MSMS
Propaquizafop	LC-MSMS
Propargite NH <sub>4</sub> <sup>+</sup>	LC-MSMS
Propazine	GC-MSMS
Propetamphos	GC-MSMS
Propiconazole	LC-MSMS
Propoxur	LC-MSMS
Propoxycarbazone	LC-MSMS
Proquinazid	LC-MSMS
Prosulfocarb	LC-MSMS
Prothiofos	GC-MSMS
Pymetrozine	LC-MSMS
Pyraclostrobin	LC-MSMS
Pyrazophos	GC-MSMS
Pyridaben	LC-MSMS
Pyridaphenthion	LC-MSMS
Pyridate	LC-MSMS
Pyrimethanil	LC-MSMS
Pyriproxyfen	LC-MSMS
Quinalphos	GC-MSMS
Quinclorac	LC-MSMS
Quinmerac	LC-MSMS
Quinoxiphen	LC-MSMS
Quizalofop	LC-MSMS
Resmethrin	LC-MSMS
Ronnel	GC-MSMS
Rotenone	LC-MSMS
Sethoxydim	LC-MSMS
Silafluofen	GC-MSMS
Simazine	LC-MSMS
Spinosyn A	LC-MSMS
Spinosyn D	LC-MSMS
Spiromesifen NH <sub>4</sub> <sup>+</sup>	LC-MSMS

Sulfotep	GC-MSMS
Sulprofos	GC-MSMS
Tebuconazole	LC-MSMS
Tebufenozide	LC-MSMS
Tebufenpyrad	LC-MSMS
Tefluthrin	GC-MSMS
Tepraloxydim	LC-MSMS
Terbufos	GC-MSMS
Terbufos Sulfone	LC-MSMS
Terbufos sulfone	GC-MSMS
Terbufos Sulfoxide	LC-MSMS
Terbutylazine	LC-MSMS
Terbutryne	LC-MSMS
Tetrachlorvinphos	GC-MSMS
Tetraconazole	LC-MSMS
Tetradifon	GC-MSMS
Tetrasul	GC-MSMS
Thiabendazole	LC-MSMS
Thiacloprid	LC-MSMS
Thiamethoxam	LC-MSMS
Thiodicarb	LC-MSMS
Thiofanox Sulfone	LC-MSMS
Thionazin	GC-MSMS
Tolclofos-methyl	GC-MSMS
Tolyfluanid	GC-MSMS
Tralkoxydim	LC-MSMS
Transfluthrin	GC-MSMS
Triadimenol	LC-MSMS
Triallate	GC-MSMS
Triazophos	GC-MSMS
Tribenuron-Methyl	LC-MSMS
Trichlorfon	LC-MSMS
Trichloronat	GC-MSMS
Tricyclazole	LC-MSMS
Trifloxystrobin	LC-MSMS
Triflumizole	LC-MSMS
Triflumuron	LC-MSMS
Trifluralin	GC-MSMS
Triticonazole	LC-MSMS
Vinclozolin	GC-MSMS
Zoxamide	LC-MSMS

## Appendix II: Nutritional Composition Requirements (for products marketed as baby foods)

When it comes to infant and childhood nutrition, all nutrients are important, but some play a more critical role than others during certain periods of development. Nutrition experts suggest a diverse diet rich in protein, whole grains, calcium, vitamins, healthy fats, and more. However, there have also been recommendations on certain ingredients and food additives to avoid.

**Note:** As indicated in Section I and Section II, the Clean Label Project Code of Practice: First 1,000 Day Promise Standard may be applicable for all ingredients, food, supplements, and consumer products marketed towards infants, toddler, children, pregnant women, and lactating mothers. Upon publication, the nutritional requirements of First 1,000 Day Promise Standard are only provided for baby foods and cereals.

### 1. No added sugar

Eating and drinking too much added sugar puts kids at risk for obesity, tooth decay, heart disease, high cholesterol, high blood pressure, type 2 diabetes, and fatty liver disease, among other health problems, according to the American Academy of Pediatrics (AAP)<sup>18</sup>. Families should focus on foods and drinks that do not have added sugar.

Added sugar can take the following, such as but not limited to, forms and shall not be permitted in products seeking compliance to Clean Label Project Code of Practice: First 1,000 Day Promise Standard:

- Brown sugar
- Corn sweetener, corn syrup, high-fructose corn syrup
- Honey dextrose
- Fruit juice concentrates
- Invert sugar, malt sugar, molasses, raw sugar, turbinado, and
- ingredients ending in “-ose.”

### 2. No artificial colors

A state of California report<sup>19</sup> found that consumption of synthetic food dyes can result in hyperactivity and other neurobehavioral problems in some children, and that children vary in their sensitivity to synthetic food dyes. The report by the California Environmental Protection Agency’s Office of Environmental Health Hazard Assessment (OEHHA) also finds that current federal levels for safe intake of synthetic food dyes may not sufficiently protect children’s behavioral health. The levels were established by the US Food and Drug Administration decades ago and do not reflect newer research.

The percentage of American children and adolescents diagnosed with Attention Deficit/Hyperactivity Disorder (ADHD) has increased from an estimated 6.1% to 10.2% during the last 20 years. Concerns about increasing rates of ADHD and other behavioral disorders prompted the California Legislature to ask OEHHA to conduct the food dye assessment.

Because of the above, and other similar studies highlighting the risk of artificial colors to infants and children, artificial colors shall not be permitted in products seeking compliance to Clean Label Project Code of Practice: First 1,000 Day Promise Standard.

Artificial colors may take the following forms on an ingredient deck:

- Red 40 – Found in beverages, breakfast cereals, baked goods, flavored yogurts, chips, gelatin, dessert powders, candy, other foods, cosmetics, medicines.
- Yellow 5 – Found in soft drinks, other beverages, baked goods, breakfast cereals, processed vegetables, chips, pickles, honey, mustard, gelatin desserts, pudding, ready to use frostings, dessert powders, candy, other foods, gum, cosmetics, medicines.
- Yellow 6 – Found in breakfast cereals, sausages, baked goods, chips, orange soda, other beverages, hot chocolate mix, ready to use frostings, dessert powders, candy, gelatin desserts, other foods, cosmetics, medicines.
- Blue 1 – Found in baked goods, ice cream, canned peas, jellies, candy, beverages, dessert powders, condiments, other foods, mouthwash, medicines.
- Red 3 – Found in sausage casings, cake decorations, baked goods, canned fruits, maraschino cherries, candy, popsicles, other foods, medicines.
- Blue 2 – Found in breakfast cereals, beverages, ice cream, candy, other foods, medicines.
- Green 3 – Found in canned peas, other processed vegetables, fish, beverages, pudding, dessert powders, ice cream, sherbets, sorbet, cotton candy, other candy, other foods, medicines, personal care products, cosmetics.
- Red 2 – Found only in the peels of some oranges.
- Orange B: Found only in some hot dog and sausage casings.
- FD&C Lakes: Formed by chemically reacting one of the above synthetic food dyes with another substance (for example, Blue 1 Lake); found in various foods and other products.

### 3. No artificial flavors

According to the American Academy of Pediatrics<sup>20</sup>, accumulating evidence from nonhuman laboratory and human epidemiologic studies suggests that colorings, flavorings, chemicals deliberately added to food during processing (direct food additives), and substances in food contact materials (including adhesives, dyes, coatings, paper, paperboard, plastic, and other polymers) that may come into contact with food as part of packaging or processing



equipment but are not intended to be added directly to food (indirect food additives) may contribute to disease and disability in the population. Children may be particularly susceptible to the effects of these compounds because they have higher relative exposures compared with adults (because of greater dietary intake per pound), their metabolic (ie, detoxification) systems are still developing, and key organ systems are undergoing substantial changes and maturations that are vulnerable to disruptions.

Because of studies such as the above, products seeking compliance to the Clean Label Project Code of Practice: First 1,000 Day Promise Standard shall not contain artificial flavors or preservatives.

#### **4. Inclusion of vegetables**

Many of the chronic illnesses<sup>21</sup> that plague modern society derive in large part from poor food choices. To promote health and prevent disease through diet and nutrition, the most recent Dietary Guidelines for Americans and the US Department of Health and Human Services' newest 10-year national objective, Healthy People 2020, recommend, in part, limiting consumption of salt, fat, and simple sugars, all of which have sensory properties that we humans find particularly palatable, and increasing the variety and contribution of fruits and vegetables in the diets of the population  $\geq 2$  y of age. Similar recommendations may soon be targeted at even younger Americans: the B-24 Project, led by the Department of Health and Human Services Office of Disease Prevention and Health Promotion and the USDA's Center for Nutrition Program and Policy, is currently evaluating the evidence base to support including infants and children from birth to 2 y of age in the Dietary Guidelines for Americans.

Because of these studies on the ongoing childhood obesity epidemic, products seeking compliance to the Clean Label Project Code of Practice: First 1,000 Day Promise Standard shall contain at least  $\frac{1}{4}$  serving of vegetables.

Products enlisted in the Partnership for Healthy America 'Veggies Early & Often' Program shall meet this requirement.

- <https://www.ahealthieramerica.org/veggies-early-often-28>