Connecticut Department of Public Health
410 Capitol Avenue, MS#51 LED
Hartford, CT 06134-0308

Fax Cover Sheet

DATE:	February 1, 2006	**TIME:**	
TO:	Directors of Health Chief Sanitarians Lead Contacts Lead Consultant Contractors	**PHONE:** **FAX:**	
FROM:	Alan J. Buzzetti, RS Supervising Environmental Sanitarian	**PHONE:** **FAX:**	(860) 509-7299 (860) 509-7295
RE:	Lead in Mexican Candy – Advisory and Information Sheet		
cc:	LPPCP Staff, Suzanne Blancaflor		

Number of pages including cover sheet: 21

Message:

Please see the enclosed information regarding lead in Mexican candy. The Food and Drug Administration (FDA) is proposing new guidance to further reduce the risk of lead exposure children face when consuming certain candies. Attached you will find a copy of a press release that the FDA issued on December 22, 2005 and an article posted on the MSNBC website on the same day. We have also included a copy of the Mexican Candy Health Alert that DPH distributed on October 19, 2004 and a copy of the FDA's actual draft guidance. Finally, we have included a copy of the American Public Health Association's (APHA) recent policy statement on lead exposure. For additional information, please go to the FDA website: http://www.cfsan.fda.gov/~dms/pbguid2.html.

You may contact Lead Poisoning Prevention and Control Program staff at (860) 509-7299 should you have any questions.

FOR IMMEDIATE RELEASE
P05-109
December 22, 2005

Media Inquiries: Michael Herndon, 301-827-6242
Consumer Inquiries: 888-INFO-FDA

FDA Proposes New Guidance to Further Reduce Children's Risk From Lead Exposure in Certain Candy

The Food and Drug Administration (FDA) today issued a draft guidance that aims to further lower children's exposure to small traces of lead present in certain candies.

FDA has taken this action to significantly reduce the current guidance level for lead in food after testing of certain types of Mexican candy products showed evidence of lead contamination at levels above those presently allowed. The new guidance level that is proposed is 0.1 part per million (ppm) of lead, significantly lower than the current guidance level of 0.5 ppm.

"This new guidance level will further reduce an already minimal risk from lead exposure in candy," said Acting FDA Commissioner Dr. Andrew von Eschenbach. "Today's action is part of our ongoing effort to educate consumers, promote good manufacturing practices, and protect public health, especially the health of our young children."

FDA has always recognized that some amount of lead in food and food ingredients can occur due to unavoidable background levels present in our environment. However, the adverse health effects of elevated lead levels in children are well documented and may have long-lasting or permanent consequences. Thus FDA's goal is to reduce to the greatest extent possible the amount of lead in candy.

While most domestic and imported candies contain lead levels of 0.1 ppm or less, data that FDA gathered through sampling imported candy from Mexico and other information received by FDA revealed that certain ingredients often used in these candy products may be a source of avoidable lead exposure. These ingredients include chili powder and certain types of salt, which are used in these candies. Examples of these products include lollipops coated with chili, and powdery mixtures of salt, lemon flavor, and chili powder sold as a snack item.

In addition, FDA is concerned that there may be certain manufacturing processes or conditions that contribute to elevated lead levels in some of these candies, such as packing products or storing ingredients in improperly glazed ceramic vessels that may leach high levels of lead into the product.

To protect consumers, FDA will:

- Continue to closely monitor the lead levels in Mexican candy and other domestic and imported candy products, work with our Mexican counterpart regulatory agencies, and take appropriate regulatory action;
- Pursue avenues of outreach, such as interaction with the candy industry, to increase industry's awareness about certain process modifications that will reduce the levels of lead in candy products; and
- Continue to assist state and local officials in their efforts to reduce exposure to lead in candy.

FDA welcomes all comments on the draft guidance. The comments will be evaluated, and then FDA will prepare a final guidance document in 2006.

Written comments on the draft guidance may be submitted up to 75 days from the date it is published. Comments should be sent to FDA's Docket Management Branch (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, Md. 20852.

The draft guidance is accessible on the FDA Website at http://www.cfsan.fda.gov/~dms/pbguid2.html.

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MSNBC – December 22, 2005

Lower Lead Limits for Children's Candy Proposed: FDA Says New Guidance Level to Further Reduce Lead Poisoning Risk

WASHINGTON - The FDA proposed Thursday a stricter recommended limit on the amount of lead, a highly toxic metal, allowable in certain Mexican-style children's candies, including spicy lollipops sold in many Hispanic neighborhoods.

The Food and Drug Administration now recommends that candies likely to be eaten by small children not contain more than one-tenth of a part per million lead, an 80 percent reduction from the previous, decade-old recommended level. The amount of lead represented by the new level does not pose a significant risk to small children, the agency said.

"This new guidance level will further reduce an already minimal risk from lead exposure in candy," said acting FDA Commissioner Dr. Andrew von Eschenbach.

The National Confectioners Association said it supports the new guidelines. The Virginia-based trade group's members include Mexican candy manufacturers, as well as U.S. candy makers with factories in Mexico.

"Today, the FDA sent a clear message that all candies sold in the United States, regardless of their country of origin, must meet the same stringent safety standards," association president Larry Graham said.

Most domestic and imported candies already meet the stricter lead threshold. However, the FDA moved to lower the limit from an earlier half a part per million after the sampling of dozens of types of candies imported from Mexico and after information from other sources revealed additional ingredients used in some sweets can boost the lead content beyond allowable levels.

Those ingredients include chili powder, tamarind pulp and salts used in lollipops and salty powdered snack mixes that an FDA official said are sold in "significant quantities," predominantly in Hispanic neighborhoods around the country. The lead is believed to come from improperly washed and stored ingredients grown in lead-contaminated soils, as well as candy wrappers printed with inks containing the metal.

Lead poisoning is linked to behavioral problems and learning disabilities and can even cause seizures or death. Children age 6 and younger are most at risk of lead poisoning as their bodies are growing quickly.

The new guidance level should take effect next year, the FDA said. The agency will go after manufacturers that flout the new guideline only after taking into account whether

their products are typically consumed by small children, said Michael Kashtock, a senior adviser and special assistant in the FDA's Division of Plant Product Safety.

Other confectionary products, including dark chocolate, can contain trace amounts of lead but are not typically eaten by young children.

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Health Alert

October 19, 2004 Connecticut Department of Public Health
Contacts: Al Buzzetti (860) 509-7299

Mexican Candy and Spice Products Contain Lead

The Connecticut Department of Public Health has learned that four children's candies have been found to have elevated lead levels that could cause learning disabilities and behavioral problems in children. The products were recently found in Southern California and Milwaukee, Wisconsin.

Three of the products are owned by a Mexican subsidiary of Mars, Inc. These candies are popular among Latino children and may be found in supermarkets, small grocers, convenience stores, and liquor stores. The products are: Lucas Limon, Lucas Acidito, Super Lucas, and Super Jovy Chili Powder. The latter is labeled as a seasoning, not a candy. However, children consume it as a sweet. These products are particularly dangerous to children because they are sold in candy aisles, including the Super Jovy Chili Powder. Children eat the salty and spicy powders contained in salt-and-pepper shakers like candy, licking them off their hands or pouring them directly onto their tongues. Lucas Limon, packed in a green label with a cartoon duck wearing sunglasses, is a salt-based product, including citric acid, natural lemon flavor, and silicon dioxide.

In July, the U.S. Consumer Product Safety Commission warned importers to stop bringing candies into the United States without ensuring that they are lead-free. The FDA has placed Super Lucas on its product detention list in Florida, meaning that it has been refused importation rights in that state. While the FDA has jurisdiction over seasonings and candy, the regulatory levels for lead are different in candies vs. seasonings. Because the seasoning-brand treats are not officially considered candies, they are not listed as having dangerous levels of lead. The candies, however, have been listed on an importation-warning list. The FDA is currently studying the issue of lead levels in seasonings and working on recommendations to reduce a federal regulatory level of 0.5 parts per million lead in candy. If your child has eaten any of these products in the past 2 months they should see a physician as soon as possible and have a blood test for lead.

For more information contact: Connecticut Department of Public Health, Childhood Lead Poisoning Prevention Program, 860-509-7745. Any consumer experiencing problems or issues

with the products mentioned in this Health Alert, should contact the FDA Consumer Complaint Line at 800-891-8295. Local and state health department personnel with cases of injuries or illnesses from these products should contact the local FDA office in Hartford at 860-240-4289.

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December 2005

Guidance for Industry

Lead in Candy Likely To Be Consumed Frequently by Small Children: Recommended Maximum Level and Enforcement Policy

Draft Guidance

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 75 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number 2005D-0481.

For questions regarding this draft document, contact Michael E. Kashtock at (301) 436-2022.

Additional copies are available from:

Office of Plant and Dairy Foods

Division of Plant Product Safety HFS-305

Center for Food Safety and Applied Nutrition

Food and Drug Administration, 5100 Paint Branch Parkway

College Park, MD 20740

http://www.cfsan.fda.gov/guidance.html

U.S. Department of Health and Human Services
Food and Drug Administration

Guidance for Industry [1]

Lead in Candy Likely To Be Consumed Frequently by Small Children: Recommended Maximum Level and Enforcement Policy

Draft Guidance

This draft guidance, when finalized, will represent the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of applicable statutes and regulations. If you want to discuss an alternate approach, contact the FDA staff responsible for implementing this guidance. If you cannot identify the appropriate FDA staff, call the appropriate number listed on the title page of this guidance.

I. Introduction

This guidance provides a recommended maximum lead level in candy[2] likely to be consumed frequently by small children. FDA considers the recommended maximum lead level to be achievable with the use of good manufacturing practices in the production of candy and candy ingredients and to be protective of human health. For additional discussion of the background and rationale underlying this recommended level, see draft "Supporting Document for Recommended Maximum Level for Lead in Candy Likely To Be Consumed Frequently by Small Children."

In addition to announcing the recommended maximum lead level, FDA is rescinding the previous .5 ppm guideline for considering enforcement action against candy products likely to be consumed frequently by small children. Further, FDA is reiterating its enforcement policy toward the use of lead-based ink on candy wrappers as originally stated in its 1995 letter to the industry on this subject.

FDA considers the issuance of this guidance to be a prudent public health measure consistent with the Agency's policy of reducing lead levels in the food supply to reduce consumers' lead exposure to the lowest level that can be practicably obtained.

FDA's guidance documents, including this guidance, do not establish legally enforceable responsibilities. Instead guidances describe the Agency's current thinking on a topic and should be viewed only as recommendations, unless specific regulatory or statutory requirements are cited. The use of the word *should* in Agency guidances means that something is suggested or recommended, but not required.

II. Discussion

A. Recommended Maximum Level for Lead in Candy Likely To Be Consumed Frequently by Small Children

FDA is recommending that lead levels in candy products likely to be consumed frequently by small children not exceed 0.1 ppm because such levels are achievable under good manufacturing practices and would not pose a significant risk to small children for adverse effects. This recommended maximum level of 0.1 ppm for lead in candy likely to be consumed frequently by small children is consistent with the FDA's longstanding goal of reducing lead levels in the food supply to reduce consumers' lead exposure to the lowest level that can be practicably obtained. This recommendation is further discussed in the supporting document for this guidance noted above.

B. Enforcement Policy for Lead in Candy Likely To Be Consumed Frequently by Small Children

FDA is rescinding the guidance it provided in the 1995 letter that stated that, where frequent consumption of candy products by small children could be anticipated, FDA would consider taking regulatory action against candy with lead levels that exceed 0.5 ppm.
The 0.1 ppm recommended maximum lead level is not an enforcement guideline. FDA intends to consider several factors in bringing enforcement actions regarding lead in candy likely to be consumed frequently by small children, including the level of lead present and the best available consumption data.

C. Enforcement Policy for Use of Lead-Based Inks on Candy Wrappers

FDA is reiterating in this guidance that FDA's policy toward the use of lead-based ink on candy wrappers remains as stated in its 1995 letter to the industry on this subject.

> Generally speaking, if lead derived from a lead-based printing ink is found on the portion of the package that directly contacts food or, if such lead could be expected to migrate into the packaged food, the product would likely be regarded as being in violation of the Federal Food, Drug, and Cosmetic Act. Use of the printing ink only on the outer (non-food contact) surface of the package does not ensure that it will not contaminate the food.

Suitable non-lead-based printing inks are widely available for use in food packaging, and we continue to strongly urge all candy manufacturers, including

those whose products are offered for import into this country, to refrain from the use of lead-based printing inks on their packaging materials.
In addition, the use of lead-based printing inks on candy wrappers may subject a firm to regulatory action by the U.S. Consumer Product Safety Commission under the Federal Hazardous Substances Act (see CPSC letters to US candy importers (PDF) and candy producers in Mexico (PDF) for additional information).

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[1] This guidance has been prepared by the Office of Plant and Dairy Foods in the Center for Food Safety and Applied Nutrition (CFSAN) at the U.S. Food and Drug Administration.
[2] We have included within the broad category of Mexican style candy, powdered snack mix products, which are generally made in Mexico and typically contain combinations of salt, chili powder, sugar and flavoring. These products, popular with children and adults, may be sold alongside of candy in retail outlets, and can be consumed directly from the container like candy, as well as being sprinkled onto fruits and vegetables or in beverages.

Supporting Document for Recommended Maximum Level for Lead in Candy Likely To Be Consumed Frequently by Small Children December 2005
Guidance for Industry: Letter to Manufacturers, Importers, and Distributors of Imported Candy and Candy Wrappers June 13, 1995
Consumer Produce Safety Commission: Letter to U.S. Candy Producers (available in PDF) July 9, 2004
Consumer Produce Safety Commission: Letter to Candy Producers in Mexico (available in PDF) July 14, 2004

FDA Proposes New Guidance to Further Reduce Children's Risk From Lead Exposure in Certain Candy December 22, 2005

PROTECTING CHILDREN FROM OVEREXPOSURE TO LEAD IN CANDY AND PROTECTING CHILDREN BY LOWERING THE BLOOD LEAD "LEVEL OF CONCERN" STANDARD

11/14/2005

2005-7

The American Public Health Association:

Recognizing that in April 2004, the Orange County Register in an investigative report, published for the first time information that the state of California had been testing for lead in candies for decades but had not informed the public about the high lead levels in many candies, candy wrappers and seasonings (sold as a snack item and consumed as candy) imported from Mexico, the Philippines and other countries,1 and

Recognizing, as a result of the April 2004, Orange County Register report, various state and county environmental health practitioners, and congressional legislators have become aware of the inconsistently high lead level found in imported candies (and their wrappers).1,2 Childhood lead poisoning has previously been reported as being associated with candy from Mexico,3,4 and

Knowing that a significant and unnecessary health risk to Latino and other children exists when they ingest many types of imported candies containing high lead levels (both salt- and sugar-based). These candies are sold in United States grocery stores, in ethnic markets, at swap meets, and from street vendor stalls and carts. Many have been found to have high levels of lead,1 and

Noting the United States Food and Drug Administration s lead enforcement standards on candies, made in Mexico, the Philippines and other countries and imported into the United States, fail to adequately protect Latino and other children who consume these candies, and

Recognizing the FDA has set no enforcement standards on imported salt-based candies and that the FDA treats these salt-based candies like seasonings,2 and

Further, recognizing that these salt-based products are stored and marketed in containers that are attractive to children and are consumed as candies. Latino and other children can consume one or more containers of these candies per day,2 and

Noting that independent laboratory test results, on samples of these salt-based candies taken from two different agencies in two different states, revealed a large variation in the lead content from one salt-based candy container to another. However, both agencies test results had the same mean average of 15 micrograms of lead per salt-based container,2 and

Understanding that at 15 micrograms of lead, in an imported salt-based candy container, it would take a young child s ingesting only four of these containers per day to increase the child s blood lead level by 10 micrograms per deciliter,5 and

Noting the FDA recommends a 6 micrograms per day tolerable limit for dietary intake of lead for children age 6 years or younger to prevent the more subtle adverse neurological and behavioral effects of lead exposure,5 and

Realizing that consuming the contents of one of these imported salt-based candy containers in a day, containing 15 micrograms of lead, exceeds the FDA's maximum recommended daily dietary lead intake standard by 150 percent, and

Noting, in regards to sugar-based candy, the FDA initially stated it would, "consider action against candy products that exceed 0.5 ppm lead"; however, the FDA subsequently revised this standard stating, "it may also consider action against candy products containing 0.5 ppm or less lead, when the amount of lead per serving is 10 micrograms or more",6 and

Understanding the FDA's enforcement level of 10 micrograms of lead per single serving of sugar-based candy exceeds the FDA's maximum recommended daily dietary lead intake standard by 67 percent, and

Noting the National Academy of Sciences' Food Chemicals Codex (FCC) specification for lead in sucrose (sugar) is 0.1 ppm.7 Therefore, the standard for lead in all candy should not exceed the standard for lead in sugar, since candy, unlike sugar, is not normally diluted with other food products before being ingested, and

Noting that in 2004, the FDA issued a warning stating, "The Food and Drug Administration (FDA) is aware of the problem associated with lead contamination of some Mexican candy products being sold in the United States and is advising parents, care providers and other responsible individuals that it would be prudent to not allow children to eat these products at this time",8 and

Recognizing this FDA warning is insufficient to protect children s health because it does not adequately prevent the consumption of these candies, either because parents and child care providers are unaware of the existence of this warning statement or because they elect not to comply with the FDA s warning, and

Realizing that in August of 2004, Lucas®, a subsidiary of Mars Inc., announced a voluntary withdrawal of these imported salt-based candies, which are labeled as seasonings. 9 However, these salt-based candies were still readily available for sale on store shelves in the United States months after the candy company announced its voluntary withdrawal,10 and

Understanding the FDA should set lead enforcement standards on all salt-based candies, rather than rely on the industry to voluntarily withdraw these lead tainted candies, and

Realizing the U.S. Consumer Product Safety Commission is charged with

protecting the public from unreasonable risks of serious injury or death from more than 15,000 types of consumer products under the agency's jurisdiction, including lead contaminated candy wrappers,11 and

Knowing children will be exposed to lead from licking or eating lead contaminated candy wrappers, the U.S. Consumer Product Safety Commission sent letters to candy producers in Mexico and to candy importers in the United States informing them to halt future imports of candy until they could ensure that the candy wrappers did not contain lead or use lead containing ink, 39,12,13 and

Realizing that legislation has been introduced directing the U.S. Consumer Product Safety Commission to adopt regulations, which would ban all consumer products that contain more than a trace amount of lead, including candy wrappers to which children under age 6 are exposed.14 Knowing that preventing the exposure to lead from all sources, including consumer products, is essential to protect children from the toxic effects of lead, and

Understanding that while lead is often noted for its neurotoxicity, an elevated lead level is also a risk factor for other health problems, such as aggressive behavior, school and social failure, hearing loss, hypertension, cardiovascular disease, renal disease, and dental caries,15 and

Understanding that lead and lead compounds have been recently listed as, "reasonably anticipated to be human carcinogens,"16 and

Recognizing several longitudinal studies, of lead exposure and cognitive function, have found neurodevelopmental delays and reduction in IQ at even low levels of lead exposure in children.15,17-23 This neurological damage caused by lead appears to be irreversible,15,24 and

Understanding research supports the conclusion that reduction of IQ in children results when blood levels are below 10 micrograms per deciliter. The evidence clearly demonstrates the highest rates of IQ loss occur at low blood lead levels,15,23,-2 9 and

Recognizing that one recent study's "best estimate" of IQ losses in children is 7.4 IQ points, as the lifetime blood lead levels rise from 1 to 10 micrograms per deciliter.15 However, the U.S. Centers for Disease Control and Prevention's "blood lead level of concern," is set at a blood lead level of 10 micrograms per deciliter or greater,30 and

Recognizing a recent international pooled analysis of data, from previous studies on the effects of lead on children s intellectual function, showed an observed decline of 6.2 IQ points for an increase in blood lead levels from < 1 to 10 micrograms per deciliter. This study also concluded that blood lead levels in children < 7.5 micrograms per deciliter is associated with intellectual deficits,29 and

Understanding recent studies suggest there may be no toxic threshold limit for the adverse consequences of lead exposure.15,29,31 Therefore, the current CDC's "blood lead level of concern" of 10 micrograms per deciliter should not be interpreted as a threshold for toxicity,31 and

Understanding that even though the CDC Childhood Lead Poisoning Prevention Program recognized that elevated blood lead levels below the CDC's "blood lead level of concern" of 10 micrograms per deciliter can cause adverse health effects, it elected not to lower its "blood lead level of concern",23,32 and

Recognizing the CDC's "blood lead level of concern" is misleading because it is actually an "action level." It is also misleading in that it implies that the significant neurological damage caused to children below this "level of concern" is not a concern of the CDC, and

Realizing that in 2002 the CDC's Advisory Committee on Childhood Lead Poisoning Prevention, which is charged with assessing scientific data and recommend changes to CDC's policy to prevent childhood lead poisoning, had its panel membership changed; replacing childhood lead poisoning experts with lead industry-connected scientists,33,34 and

Realizing that the U.S. Department of Health and Human Services' regulations require clinical laboratory proficiency testing and that this testing allows laboratories to operate within a blood lead level testing error range of 8 micrograms per deciliter (± 4 micrograms per deciliter) at the lower blood lead levels.35 Understanding that this large testing error range is not warranted because at this error range it is not possible to accurately assess lower lead level toxicity occurring in children, and

Knowing the federal blood lead level testing error range is more lenient than, "external quality assessment schemes," operated in Canada and in the United Kingdom. In Canada and in the United Kingdom good laboratory performance, at a blood lead level of 10 micrograms per deciliter, is expected to be within an error range of 2 micrograms per deciliter (± 1 micrograms per deciliter),36 and

Recognizing there is no effective medical treatment for children with moderately elevated blood lead levels and the evidence supports a shift toward primary prevention of lead exposure,15,29 and

Recognizing that high blood lead levels in children is still a very serious health concern. The CDC noted that during 1999-2002, among those children aged 1 through 5 years, approximately 1.6 percent had blood lead levels greater than or equal to 10 micrograms per deciliter,37 and

Understanding that prevention is the only way to achieve the nation's 2010 health objective of reducing all young children s blood lead levels to below 10 micrograms per deciliter,38 and

Understanding that lead poisoning is one of the most serious preventable pediatric

health problems today, yet the vast majority of cases go undiagnosed and untreated,30 and

Noting that previous APHA policy statements and resolutions do not address lead in food products (candy and their wrappers) but address lead in the environment, such as lead in paint,40-45 and

Noting also that previous APHA policy statements do not address the issue of the CDC's lowering its current blood lead action level or the need to increase the accuracy of blood lead level testing, and

Recognizing that the protection of the health of children has been an expressed basic tenet of the public health profession for many years,46 and

Recognizing that the candy imported from the Philippines and Mexico has negative health effects on children in those countries, and

Noting that the Philippines and Mexico are under legal obligation to fulfill, protect and respect child rights, specifically as stated in articles 3, 6 and 24 of the Convention on the Rights of the Child, which was signed and ratified by the Philippines and Mexico. These rights include ensuring protection, care, development of the child and enjoyment of the highest attainable standard of health.

Therefore, the American Public Health Association:

1. Supports the elimination of childhood lead exposure by banning all nonessential uses of lead and supports further reducing the allowable levels of lead in air emission, house dust, soil, food and water.
2. Supports federal legislation to ban lead from candy wrappers and other consumer products.
3. Supports the improvement and continual updating of the lead exposure risk-questionnaire screening guidelines to include questions on all known possible sources of lead exposure.
4. Supports the development of an aggressive culturally and linguistically appropriate prevention and education program, by public health workers, to teach the public about the dangers and effects of consuming imported candy and their wrappers with high lead levels.
5. Supports additional scientific studies to more fully understand the toxic effects of lead in children at blood lead levels below 10 micrograms per deciliter.
6. Calls on Congress to direct the FDA, in FDA s next appropriations bill, to prioritize work on setting lead level standards for salt-based candy and reviewing its current lead level standards for sugar-based candy.
7. Calls on the FDA to set a lead enforcement standard of 0.1 ppm for all candy sold in the United States (regulating domestic and imported candy, including salt-based seasonings that are consumed as candy and which are made in Mexico).
8. Calls on the FDA to conduct sufficient monitoring of candy and to take

aggressive enforcement action when its lead standards are exceeded.
9. Calls on the U.S. Consumer Product Safety Commission to strongly enforce the ban on the importation of candy from Mexico containing lead contaminated candy wrappers, as detailed in their July 2004 letters to Mexican candy manufacturers and to U.S. candy importers.
10. Calls on the CDC to substantially lower its current "blood lead level of concern" because the current action level is set too high and does not adequately protect children from the toxic effects of lead.
11. Calls on the CDC to develop intervention guidelines for children with blood lead levels above the revised "level of concern" and below 10 micrograms per deciliter, with an emphasis on preventing all possible sources of childhood exposures to lead.
12. Calls on the Department of Health and Human Services to amend its regulatory requirement and require all laboratories, certified to perform testing on human specimens under the Clinical Laboratory Improvement Amendments of 1988, to operate with a total allowable blood lead level error of ± 1 microgram per deciliter or ± 10%, whichever is greater.
13. Calls on the governments of the Philippines and Mexico, as well as Public Health Associations of those countries, to address this child health risk.

14. Calls on the Committee on the Convention of the Rights of the Child, a monitoring body at the U.N., to address this risk of lead exposure from candy produced in the Philippines and Mexico.

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