

March 2021

Re: Pesticide Screening and Heavy Metal Compounds Review Program Statement

Ardent Mills takes food safety and compliance with laws and regulations relating to food safety very seriously. The Food Safety Modernization Act (FSMA) requires processors and manufacturers of products to conduct hazard analyses and to identify hazards that can be found in the processing or manufacturing of products and ingredients. Ardent Mills has completed this risk-based hazard assessment and incorporated this process into the Food Safety Plan that we have combined with the existing HACCP plan. This assessment reviewed the hazard categories to include biological, chemical, and physical hazards as expanded in the PCHF requirements.

Regarding the topic of pesticide residue, this is evaluated as very low risk. This is based on review of crop harvest data compiled from wheat growing state universities, industry association review, and USDA survey data of wheat. Each year, Ardent Mills conducts a review of the varieties of wheat used with a sampling plan conducted at various milling locations. This review conducts multiple residue analyses on over 300 compounds. The EPA Index to Pesticides Part 180 is used as reference. Review to Health Canada and CFIA regulations are also referenced.

Ardent Mills has implemented this program in an effort to provide additional information regarding the assessment of risks from contamination by certain chemical residues in wheat flour. Due to the concern for pesticide residues in food, it is the intention of Ardent Mills to perform these tests to verify that the flour produced at its mills is safe and in accordance with any and all regulations regarding pesticide residues.

Regarding the topic of heavy metals residue, this is also evaluated as very low risk. This is based on review of crop harvest data compiled from wheat growing state universities, industry association reviews, and USDA survey data. The review evaluates heavy metal testing to include lead, cadmium, mercury, and arsenic conducted by a third-party lab. There are not specific FDA or CFIA regulations on these heavy metal materials and the results have been noted be very low from the data compiled.

These tests as described are performed on a variety of wheat classes representing the various wheat growing regions that we source wheat. In the unlikely event that a sample exceeds the regulatory tolerance, each corresponding lot of wheat is isolated until the test is completed. By doing this, assurance is made that the corresponding wheat has not been milled into flour and left the control of Ardent Mills.

Sincerely,  
Ardent Mills Regulatory Team  
[AMRegulatoryRequest@ardentmills.com](mailto:AMRegulatoryRequest@ardentmills.com)