

November 2022

Re: Mycotoxin, Pesticide and Heavy Metal Statement – Emerging Nutrition

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 analysis 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 Preventive Controls for Human Foods (PCHF) requirements. Ardent Mills requires their suppliers of the raw grain to provide testing of Mycotoxins, Heavy Metals and Pesticides.

Regarding the topic of mycotoxins, this is evaluated as very low risk. This is based on review of suppliers' data; as well as Ardent Mills testing of the varieties of raw grains used with a sampling plan conducted at various processing facilities. The raw grains are evaluated according to the mycotoxin of concern for each of these products.

Regarding the topic of pesticide residue, this is evaluated as very low risk. This is based on review of suppliers' data; as well as Ardent Mills annual testing review of the varieties of raw grains used with a sampling plan conducted at various processing facilities. 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 to provide additional information regarding the assessment of risks from contamination by certain chemical residues in grain products. Due to the concern for pesticide residues in food, it is the intention of Ardent Mills to perform these tests to verify that the raw grains processed, and the flour produced are safe and in accordance with all regulations regarding pesticide residues.

Regarding the topic of heavy metals residue, this is also evaluated as a very low risk. This is based on review of suppliers' data, survey results and Ardent Mills monitoring. The review evaluates heavy metal testing to include lead, cadmium, mercury, and arsenic conducted by a third-party lab. There are no 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 for heavy metals, pesticides and mycotoxins are performed on a variety of grains representing the various grain products that we source. In the unlikely event that a sample exceeds the regulatory tolerance (for tests where a tolerance has been established), each corresponding lot of raw grain is isolated until the test is completed. By doing this, assurance is made that the corresponding product has not been processed and left the control of Ardent Mills.

If a customer requires specific testing or additional testing, a discussion must be conducted with the Ardent Mills Regulatory team and Sales representative to review specification and timing of testing.

Sincerely,  
Ardent Mills Regulatory Team  
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