



Response to Consumer Reports Article on Metal Content

Pascha Chocolate is aware of the in Consumer Reports article that has just been released regarding metal content in chocolate.

This is an issue the chocolate industry takes very seriously and has been working hard on for several years to ensure product safety. As the National Confectioners Association said in a statement they put out last week:

“The products cited in this study are in compliance with strict quality and safety requirements,”

<https://candyusa.com/news/nca-statement-on-consumer-reports-chocolate-and-cocoa-study/>

The standards that Pascha Chocolate works to are the now generally accepted standards established in a 2018 Settlement between the chocolate industry and advocates of California’s Prop 65 law. This 2018 Agreement defined acceptable safety standards that superseded the limits for cadmium and lead cited in the original Prop 65 law in California that Consumer Reports refers to. Pascha Chocolate tests every batch of cocoa beans and every batch of finished chocolate to ensure that all chocolate we sell is under the agreed 2018 limits.

You may be interested in the report done on metals in chocolate that is published on the As You Sow website. As You Sow are one of the main consumer advocate groups in California active in Prop 65 investigations in chocolate and other industries.

<https://www.asyousow.org/environmental-health/toxic-enforcement/toxic-chocolate>

The As You Sow website scores different chocolate brands against the safety criteria on metals in chocolate and gives Pascha a “green light” finding our products safe and in compliance.

Pascha Chocolate were contacted by Consumer Reports before they released their report and we provided feedback. We note that the Consumer Reports article ignores some important parts of the debate that they were aware of:

- Major progress has been made by the industry to reduce metal levels over the last few years since Consumer Reports first reported on it and yet they make no mention of this in their new report.



- The report does not use the standards established in 2018 by the main consumer advocates of Prop 65 protection and the main industry companies.
- There are no FDA defined maximum metal levels in chocolate but there are some international levels that again the Consumer Reports piece ignores. In the EU the maximum level for cadmium in chocolate with more than 50% cocoa content is 0.8 ppm, which is much higher than the limit that Pascha Chocolate works to.
- Consumer Reports show their test data in percentage terms instead of more meaningful actual numbers. The difference in their eyes between “good” and “high” is about 0.25 parts per million. Expressing this difference as a percentage is good for generating headlines but makes differences between products sound much larger than it is when expressed in actual parts per million.
- Consumer Reports ignore serving size. They compared everything on a 1 oz basis, which is not the usual consumption size of high cacao bars of chocolate which tend to be eaten in small quantities such as a square at a time. Because of the ppm levels involved it is the total amount of chocolate eaten that is of far more importance to metal exposure than anything else.

Pascha Chocolate Company remains committed to working to the accepted safety standards for chocolate, and in relation to cadmium and lead this means the 2018 standard agreed between the major industry players and the prime consumer advocates of Prop 65 protections. Every product we sell meets those standards.

A handwritten signature in blue ink, appearing to read "Simon Lester".

Simon Lester
President & CEO
Date: December 19 2022