



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
ENVIRONMENTAL PROTECTION BUREAU

February 16, 2022

**Via Certified Mail, UPS Next Day,
and Secretary of State**

**JSG Babyfood LLC
a/k/a JSG Organics LLC
d/b/a HolleUSA
535 Eighth Avenue
Suite 21 North
New York, NY 10018**

**Re: False or Misleading Advertising Regarding
Heavy Metals in Holle Baby Food Products**

Dear Sir or Madam:

The Office of the New York Attorney General (OAG) has reason to believe that JSG Babyfood LLC, a/k/a JSG Organics, LLC, d/b/a HolleUSA, has and is engaging in repeated or persistent fraud or illegality, deceptive business practices, and false or misleading advertising in violation of N.Y. Executive Law § 63(12) and General Business Law §§ 349 and 350. Specifically, HolleUSA is offering for sale in the State of New York various baby foods that are marketed as having “[n]o detectable traces of heavy metals” and as being “Lead Free.” Examples of these statements from the HolleUSA website are attached to this letter. However, our office obtained several HolleUSA baby food products in the State of New York through HolleUSA’s website and Amazon.com and had them tested for heavy metals by Brooks Applied Labs (Bothell, WA). We discovered that they do, in fact, contain detectable levels of heavy metals, specifically lead, cadmium, and arsenic. The analytical reports by Brooks Applied Labs, and a key to the products sampled, are attached to this letter.

Pursuant to New York Executive Law § 63(12) and General Business Law §§ 349 and 350, OAG may investigate potential fraudulent or deceptive business practices, including false advertising, via subpoenas for information or testimony.

Holle USA
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OAG also may bring an action or proceeding to enjoin fraudulent or deceptive business practices, including false advertising, and to obtain restitution, damages, and other appropriate equitable relief. Additionally, pursuant to General Business Law § 350-d, OAG may seek penalties in the amount of \$5,000 per violation.

Upon receipt of this letter, please promptly remove all false and misleading claims relating to your products being free of heavy metals from your website, as well as from all sales materials, including virtual store fronts on online retailers such as Amazon.com. This includes both explicit statements that your products have “no detectable traces of heavy metals” as well as any labels or graphics suggesting that a product is free of heavy metals, such as a “Pb” with a line through it.

OAG reserves its right to pursue any appropriate legal, equitable, or administrative remedy and to submit investigatory subpoenas pursuant to Executive Law § 63(12) or any other relevant law. Additionally, please accept this letter as constituting the five-day notice of the potential commencement of legal action required by General Business Law § 349(c).

We thank HolleUSA for its anticipated cooperation. Should you have any questions, please contact the undersigned at 518-776-2339 or brian.lusignan@ag.ny.gov.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian Lusignan", written in a cursive style.

Brian Lusignan
Assistant Attorney General

ATTACHMENT 1

Examples of Advertisements

Free shipping on orders over \$99!



(888) 507-7275 | support@holleusa.com

Login

0

Give your baby a biodynamic head start!

Holle is available in these fine retailers.

Find your Store

Shop Online

Find a store



Central Market

LAZY ACRES natural market

Pink Dot.

hive







Always Organic

For more than 85 years, Holle has met the highest standards in organic quality. Holle serves families from the infant years through toddlerhood, ensuring your family is growing up with the best that nature has to offer.

GET A FREE ITEM



Deliver to Brian
Glenmont 12077

Pet Supplies



Hello, Brian
Account & Lists

Returns
& Orders



All Best Sellers Kindle Books Toys & Games New Releases Books Amazon Basics Buy Again Livestreams Black is remarkable

Pet Supplies Pet Profiles Dogs Cats Fish & Aquatics Small Animals Birds Reptiles Horses Deals & Coupons Pet Care Tips

60

Baby Products > Feeding > Baby Foods > Meals

Sponsored



Roll over image to zoom in

Holle Organic Baby Food - Carrot Cat - Non GMO - Carrot, Mango, Banana & pear - Box of 6 Pouches

Brand: Holle
★★★★★ 7 ratings
Climate Pledge Friendly

Price: \$17.95 (\$2.99 / Count)
prime One-Day

Coupon: Save an extra 20% when you apply this coupon. Terms

Get 5% back (\$0.89 in rewards) on the amount charged to your Amazon Prime Rewards Visa Signature Card.

Flavor: Carrot Cat

Blue Bird
\$17.95 (\$17.95 / Count)
prime

Carrot Cat
\$17.95 (\$2.99 / Count)
prime

Veggie Bunny
\$17.95 (\$17.95 / Count)
prime

Zebra Beet
\$17.95 (\$2.99 / Count)
prime

Brand: Holle
Flavor: Carrot Cat
Item Form: Semi Moist
Material: BPA Free, Lead Free, Mercury Free
Type Free: Free, Mercury Free
Age Range: Baby

One-time purchase:

\$17.95 (\$2.99 / Count)

prime One-Day

FREE delivery **Tomorrow, February 9.** Order within 5 hrs 5 mins

Deliver to Brian - Glenmont 12077

In Stock.

Quantity: 1

Add to Cart

Buy Now

Secure transaction

Ships from Amazon
Sold by Holle USA

Return policy: Eligible for Refund or Replacement

Add a gift receipt for easy returns

Subscribe & Save:

10% / 15%

\$16.16

prime

First delivery on Feb 9

Ships from: Amazon
Sold by: Holle USA

Add to List

Add to Baby Registry

Add to Registry & Gifting

Share

Have one to sell?

Sell on Amazon

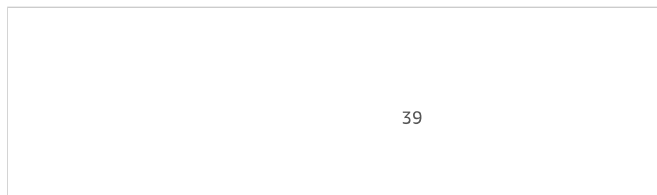
(Description)

About this item

- Ideal as a snack, between meals, or on the go.
- Fine purée made from 100% Biodynamic Demeter quality ingredients.
- Made in Europe from Non-GMO, organic fruits, and veggies.
- Resealable Pouch, Shelf Stable, Non-BPA, Recyclable Cap.
- Box of 6 (3.½) ounce pouches



Sponsored ⓘ



Sponsored ⓘ

Frequently bought together



Total price: \$53.85

Add all three to Cart

- ✓ **This item:** Holle Organic Baby Food - Carrot Cat - Non GMO - Carrot, Mango, Banana & pear - Box of 6 Pouches \$17.95 (\$2.99/Count) ✓prime
- ✓ Holle Organic Baby Food - Panda Peach - Non GMO - peach, apricot, banana with spelt - Case of 6 Pouches \$17.95 (\$2.99/Count) ✓prime
- ✓ Holle Organic Baby Food - Banana Lama - Non GMO - banana, apple, mango & apricot - Box of 6 Pouches \$17.95 (\$2.99/Count) ✓prime

Products related to this item

Sponsored ⓘ



Amara Organic Baby Food | Kale Potato | Mix with Breastmilk or Water | Certified Or...
 ★★★★★☆ 118
 \$29.92 (\$29.92/Count)



Serenity Kids Baby Food Pouches, Organic Carrots, Spinach & Basil with Organic Oliv...
 ★★★★★☆ 570
 \$20.95 (\$3.49/Count)
 ✓prime



Serenity Kids Baby Food Pouches, Grass Fed Beef with Organic Kale and Sweet Potatoe...
 ★★★★★☆ 1,251
 \$23.95 (\$1.14/Ounce)
 ✓prime



Amara Organic Baby Food | Sweet Potato Raspberry | Mix with Breastmilk or Water | C...
 ★★★★★☆ 401
 \$10.99 (\$4.40/Ounce)
 ✓prime



Cerebelly Baby Food Pouches – Peppa Pig Celery Apple Kiwi Smoothie (Pack of 6),...
 ★★★★★☆ 291
 \$14.99 (\$2.50/Count)
 ✓prime

⚠ WARNING:

CHOKING HAZARD -- Small parts. Not for children under 3 yrs.

Have a question?

Find answers in product info, Q&As, reviews

🔍 Type your question or keyword

Climate Pledge Friendly

Climate Pledge Friendly uses sustainability certifications to highlight products that support our commitment to help preserve the natural world. Time is fleeting. Learn more

PRODUCT CERTIFICATION (1)



USDA Organic products are grown and processed according to standards addressing soil and water quality, among other factors.

Product Description

For babies 6 months and up Ideal as a snack, between meals, or on the go. Fine purée made from 100% Biodynamic Demeter quality ingredients. Made in Europe from Non-GMO, organic fruits, and veggies. Resealable Pouch, Shelf Stable, Non-BPA, Recyclable Cap. Box of 6 (3.½) ounce pouches Carbon Neutral Certified.

Product details

Is Discontinued By Manufacturer : No

Product Dimensions : 5.6 x 3 x 6.1 inches; 1.57 Pounds

UPC : 860007061585

Manufacturer : Organic-Family GmbH

ASIN : B09835VZTS

Country of Origin : Italy

Best Sellers Rank: #9,254 in Baby (See Top 100 in Baby)

#189 in Baby Food Meals

Customer Reviews:

★★★★☆ 7 ratings

Videos

Help others learn more about this product by uploading a video!

Upload video

Important information

Ingredients

Demeter Biodynamic - Organic Carrot 39%, Demeter Biodynamic - Organic Mango 20%, Demeter Biodynamic - Organic Pear 20%, Organic Banana 20%, Organic lemon juice concentrate 1%, Finely puréed pure fruit and vegetables without any additives - grown in (Italy)

Directions

Use a spoon to feed the purée to younger children. Easy to use resealable pouch. Keep the screw cap out of reach of children. Can be stored in the fridge for 2 days after opening.

Legal Disclaimer

Statements regarding dietary supplements have not been evaluated by the FDA and are not intended to diagnose, treat, cure, or prevent any disease or health condition.

Prime free delivery

Sponsored ⓘ



Amara Organic Baby Food | Sweet Potato Raspberry | Mix with Breastmilk or Water | C...
★★★★☆ 118
\$21.96 (\$21.96/Count)
✓prime



Serenity Kids Baby Food Pouches, Organic Sweet Potato & Parsnip with Organic Olive ...
★★★★☆ 570
\$20.95 (\$3.49/Count)
✓prime



Holle Organic Baby Food - Panda Peach - Non GMO - peach, apricot, banana with spelt...
★★★★☆ 39
\$17.95 (\$2.99/Count)
✓prime



Amara Organic Baby Food | Sweet Potato Raspberry | Mix with Breastmilk or Water | C...
★★★★☆ 401
\$10.99 (\$4.40/Ounce)
✓prime



SpoonfulONE Early Allergen Introduction Crunchy Puffs | Smart Feeding Snack Food fo...
★★★★☆ 21
\$39.99 (\$1.43/Count)
✓prime

Sponsored ⓘ

Customer Questions & Answers

See questions and answers

Free shipping on orders over \$99!



f y p i in (888) 507-7275 | support@holleusa.com

Login

0



Holle Organic 6+ Zebra Beet Fruit Puree & Veggie Juice (12 Pack)

No reviews

\$35.90

One-time purchase \$35.90

Subscribe & save 10% \$32.31

[Subscription details](#)

Pay in full or in 4 interest-free installments for orders between \$50 and \$3000 with **shop Pay**

[Learn more](#)

Size

12 Pouches (\$2.99 ea.)



Qty

— | | +

Add to Cart

Buy with
PayPal

Free shipping on orders over \$99

Meet our newest offering from Holle. Tasty organic fruit and vegetable purees made without added sugar or salt. The ideal snack between meals or on the go. Made with ingredients of the best Demeter/biodynamic & non-GMO quality in Italy. Six varieties to choose from for 6 months +. No detectable traces of heavy metals (see analysis)

+ Ingredients

+ Directions For Use

Customer Reviews

No reviews yet [Write a review](#)

Write a review

Name

Enter your name

Email

john.smith@example.com

ATTACHMENT 2

Testing Results and Key

Purchased from HolleUSA.com	Purchased from Amazon.com		
Sample ID	Sample ID	Box UPC	Pouch UPC
Carrot Cat Fruit & Veggie Puree	Carrot Cat	260688630227	260688630210
H1C	A1C		
H2C	A2C		
H3C	A3C		
Zebra Beet Fruit Puree and Veggie Juice	Zebra Beet	260688630081	260688630074
H4Z	A4Z		
H5Z	A5Z		
H6Z	A6Z		
Veggie Bunny Veggie Puree	Veggie Bunny	260688630128	260688630111
H7V	A7V		
H8V	A8V		
H9V	A9V		



18804 North Creek Parkway, Ste 100, Bothell, WA 98011 • USA • T: 206 632 6206 F: 206 632 6017 • info@brooksapplied.com

February 2, 2022

New York State Office of the Attorney General
Environmental Protection Bureau 28 Liberty Street 19th Floor,
New York, NY, 10005

RE: Project NYA-NY2101

Revision 2: This revision includes updated arsenic results after the samples were re-prepared due to a SRM recovering outside of acceptance criteria in the original sequence (S211474). The arsenic results were reported from the reanalysis (S220118). No other changes were made to the content of this report.

Dear New York State Office of the Attorney General,

On December 22, 2021 Brooks Applied Labs (BAL) received eighteen (18) samples. The samples were logged-in for the analyses of total recoverable arsenic (As), cadmium (Cd), mercury (Hg), and lead (Pb) according to the submitted chain-of-custody (COC) form. All samples were received and stored according to BAL SOPs.

Total Metals Quantitation (As, Cd, Hg, & Pb) by AOAC 2015.01, mod.

A known mass of each sample was weighed into a microwave digestion vessel, and then aliquots of concentrated hydrogen peroxide and nitric acid were added to all samples. All vessels were sealed and then digested at elevated temperature and pressure in a laboratory microwave system. All resulting digests were diluted to a known final volume and then analyzed for As, Cd, Hg, and Pb content via inductively coupled plasma triple quadrupole mass spectrometry (ICP-QQQ-MS). The ICP-QQQ-MS uses advanced interference removal techniques to ensure accuracy of the sample results. For more information, please visit the *Interference Reduction Technology* section on our website, brooksapplied.com.

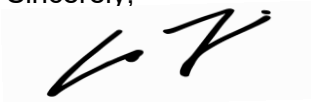
All sample results were method blank corrected and evaluated using reporting limits adjusted to account for sample aliquot size. Please refer to the *Sample Results* page for sample-specific MDLs, MRLs, and other details.

In instances when either the native sample concentration was non-detectable, reported as less than or equal to the method detection limit (MDL), and/or the corresponding DUP result was also non-detectable, the RPD between the two values was not calculated (**N/C**).

All data was reported without qualification, aside from concentration qualifiers, and all associated quality control results met acceptance criteria.

BAL, an accredited laboratory, certifies that the reported results of all analyses for which BAL is NELAP accredited meet all NELAP requirements. For more information, please see the *Report Information* page in your report. Please feel free to contact us if you have any questions regarding this report.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Palik', is placed on a light gray rectangular background.

Adam Palik
Special Project Coordinator
Adam@brooksapplied.com



Report Information

Laboratory Accreditation

BAL is accredited by the *National Environmental Laboratory Accreditation Program* (NELAP) through the State of Florida Department of Health, Bureau of Laboratories (E87982) and is certified to perform many environmental analyses. BAL is also certified by many other states to perform environmental analyses. For a current list of our accreditations/certifications, please visit our website at <http://www.brooksapplied.com/resources/certificates-permits/> or review Tables 1 and 2 in our Accreditation Information. Results reported relate only to the samples listed in the report.

Field Quality Control Samples

Please be notified that certain EPA methods require the collection of field quality control samples of an appropriate type and frequency; failure to do so is considered a deviation from some methods and for compliance purposes should only be done with the approval of regulatory authorities. Please see the specific EPA methods for details regarding required field quality control samples.

Common Abbreviations

AR	as received	MS	matrix spike
BAL	Brooks Applied Labs	MSD	matrix spike duplicate
BLK	method blank	ND	non-detect
BS	blank spike	NR	non-reportable
CAL	calibration standard	N/C	not calculated
CCB	continuing calibration blank	PS	post preparation spike
CCV	continuing calibration verification	REC	percent recovery
COC	chain of custody record	RPD	relative percent difference
D	dissolved fraction	SCV	secondary calibration verification
DUP	duplicate	SOP	standard operating procedure
IBL	instrument blank	SRM	reference material
ICV	initial calibration verification	T	total fraction
MDL	method detection limit	TR	total recoverable fraction
MRL	method reporting limit		

Definition of Data Qualifiers

(Effective 3/23/2020)

E	An estimated value due to the presence of interferences. A full explanation is presented in the narrative.
H	Holding time and/or preservation requirements not met. Please see narrative for explanation.
J	Detected by the instrument, the result is > the MDL but ≤ the MRL. Result is reported and considered an estimate.
J-1	Estimated value. A full explanation is presented in the narrative.
M	Duplicate precision (RPD) was not within acceptance criteria. Please see narrative for explanation.
N	Spike recovery was not within acceptance criteria. Please see narrative for explanation.
R	Rejected, unusable value. A full explanation is presented in the narrative.
U	Result is ≤ the MDL or client requested reporting limit (CRRL). Result reported as the MDL or CRRL.
X	Result is not BLK-corrected and is within 10x the absolute value of the highest detectable BLK in the batch. Result is estimated.
Z	Holding time and/or preservation requirements not established for this method; however, BAL recommendations for holding time were not followed. Please see narrative for explanation.

These qualifiers are based on those previously utilized by Brooks Applied Labs, those found in the EPA SOW ILM03.0, Exhibit B, Section III, pg. B-18, and the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Superfund Data Review; USEPA; January 2010. These supersede all previous qualifiers ever employed by BAL.



Accreditation Information

Table 1. Accredited method/matrix/analytes for TNI
 Issued by: State of Florida Dept. of Health (The NELAC Institute 2016 Standard)
 Issued on: July 1, 2021; Valid to: June 30, 2022
 Certificate Number: E87982-37

Method	Matrix	TNI Accredited Analyte(s)
EPA 1638	Non-Potable Waters	Ag, Cd, Cu, Ni, Pb, Sb, Se, Tl, Zn
EPA 200.8	Non-Potable Waters	Ag, Al, As, Ba, Be, Cd, Co, Cr, Cu, Mn, Mo, Ni, Pb, Sb, Se, Tl, U, V, Zn
EPA 6020	Non-Potable Waters	Ag, Al, As, Ba, Be, Ca, Cd, Co, Cr, Cu, Fe, Mg, Mn, Mo, Ni, Pb, Sb, Se, Tl, U, V, Zn
	Solids/Chemicals & Biological	Ag, Al, As, Ba, Be, Ca, Cd, Co, Cr, Cu, Fe, Mg, Mn, Mo, Ni, Pb, Sb, Se, Tl, V, Zn
BAL-5000	Non-Potable Waters	Ag, Al, As, Ba, Be, Ca, Cd, Co, Cr, Cu, Fe, Mg, Mn, Mo, Ni, Pb, Sb, Se, Sn, Sr, Tl, U, V, Zn, Hardness
	Solids/Chemicals	Ag, As, B, Be, Cd, Co, Cr, Cu, Pb, Mo, Ni, Sb, Se, Sn, Sr, Tl, V, Zn
	Biological	Ag, Al, As, Ba, Be, Ca, Cd, Co, Cr, Cu, Fe, Mg, Mn, Mo, Ni, Pb, Sb, Se, Sn, Tl, V, Zn
EPA 1640	Non-Potable Waters	Cd, Cu, Pb, Ni, Zn
EPA 1631E	Non-Potable Waters, Solids/Chemicals & Biological	Total Mercury
EPA 1630	Non-Potable Waters	Methyl Mercury
BAL-3200	Solids/Chemicals & Biological	Methyl Mercury
BAL-4100	Non-Potable Waters	As(III), As(V), DMAs, MMAs
BAL-4201	Non-Potable Waters	Se(IV), Se(VI)
BAL-4300	Non-Potable Waters Solid/Chemicals	Cr(VI)
SM2340B	Non-Potable Waters	Hardness



Accreditation Information

**Table 2. Accredited method/matrix/analytes for ISO (1),
 Non-Governmental TNI (2)
 Issued by: ANAB
 Issued on: September 21, 2021; Valid to: March 30, 2024**

Method	Matrix	ISO and Non-Gov. TNI Accredited Analyte(s)
EPA 1638 Mod EPA 200.8 Mod EPA 6020 Mod	Non-Potable Waters	Ag, Al, As, B, Ba, Be, Ca, Cd, Co, Cr, Cu, Fe, Mg, Mn, Mo, Ni, Pb, Sb, Se, Sn, Sr, Ti, U, V, Zn
BAL-5000	Solids/Chemicals & Biological	Ag, Al, As, B, Ba, Be, Ca, Cd, Co, Cr, Cu, Fe, Mg, Mn, Mo, Ni, Pb, Sb, Se, Sn, Sr, Ti, V, Zn Hg (Biological Only)
EPA 1640 Mod	Non-Potable Waters	Cd, Cu, Pb, Ni, Zn Ag, As, Cr, Co, Se, Ti, V (ISO Only)
EPA 1631E Mod BAL-3100	Non-Potable Waters, Solids/Chemicals & Biological/Food	Total Mercury
EPA 1630 Mod BAL-3200	Non-Potable Waters, Solids/Chemicals Biological	Methyl Mercury
EPA 1632A Mod BAL-3300	Non-Potable Waters Biological/Food Solids/Chemicals	Inorganic Arsenic (ISO Only) Inorganic Arsenic (ISO Only)
AOAC 2015 01 Mod BAL-5000	Food	As, Cd, Hg, Pb
BAL-4100	Non-Potable Waters Biological by BAL-4117	As(III), As(V), DMAs, MMAs Inorganic Arsenic, DMAs, MMAs (ISO Only)
BAL-4101	Food by BAL-4117	Inorganic Arsenic, DMAs, MMAs (ISO Only)
BAL-4201	Non-Potable Waters	Se(IV), Se(VI), SeCN, SeMet
BAL-4300	Non-Potable Waters, Solid/Chemicals	Cr(VI)
SM 3500-Fe BAL-4500	Non-Potable Waters	Fe, Fe(II) (ISO Only)
SM2340B	Non-Potable Waters	Hardness
SM 2540G BAL-0501	Solids/Chemicals & Biological	% Dry Weight



Sample Information

Sample	Lab ID	Report Matrix	Type	Sampled	Received
H1C	2112258-01	Biota	Sample	12/17/2021	12/22/2021
H2C	2112258-02	Biota	Sample	12/17/2021	12/22/2021
H3C	2112258-03	Biota	Sample	12/17/2021	12/22/2021
H4Z	2112258-04	Biota	Sample	12/17/2021	12/22/2021
H5Z	2112258-05	Biota	Sample	12/17/2021	12/22/2021
H6Z	2112258-06	Biota	Sample	12/17/2021	12/22/2021
H7V	2112258-07	Biota	Sample	12/17/2021	12/22/2021
H8V	2112258-08	Biota	Sample	12/17/2021	12/22/2021
H9V	2112258-09	Biota	Sample	12/17/2021	12/22/2021
A1C	2112258-10	Biota	Sample	12/17/2021	12/22/2021
A2C	2112258-11	Biota	Sample	12/17/2021	12/22/2021
A3C	2112258-12	Biota	Sample	12/17/2021	12/22/2021
A4Z	2112258-13	Biota	Sample	12/17/2021	12/22/2021
A5Z	2112258-14	Biota	Sample	12/17/2021	12/22/2021
A6Z	2112258-15	Biota	Sample	12/17/2021	12/22/2021
A7V	2112258-16	Biota	Sample	12/17/2021	12/22/2021
A8V	2112258-17	Biota	Sample	12/17/2021	12/22/2021
A9V	2112258-18	Biota	Sample	12/17/2021	12/22/2021

Batch Summary

Analyte	Lab Matrix	Method	Prepared	Analyzed	Batch	Sequence
As	Biota	AOAC 2015.01, Mod	01/28/2022	01/28/2022	B220187	S220118
Cd	Biota	AOAC 2015.01, Mod	12/29/2021	12/29/2021	B213534	S211474
Hg	Biota	AOAC 2015.01, Mod	12/29/2021	12/29/2021	B213534	S211474
Pb	Biota	AOAC 2015.01, Mod	12/29/2021	12/29/2021	B213534	S211474



Sample Results

Sample	Analyte	Report Matrix	Basis	Result	Qualifier	MDL	MRL	Unit	Batch	Sequence
H1C,										
2112258-01	As	Biota	AR	2.7	J	0.8	3.3	µg/kg	B220187	S220118
2112258-01	Cd	Biota	AR	4.1		0.4	1.0	µg/kg	B213534	S211474
2112258-01	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-01	Pb	Biota	AR	3.6		0.3	1.0	µg/kg	B213534	S211474
H2C,										
2112258-02	As	Biota	AR	2.5	J	0.8	3.3	µg/kg	B220187	S220118
2112258-02	Cd	Biota	AR	3.6		0.4	1.0	µg/kg	B213534	S211474
2112258-02	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-02	Pb	Biota	AR	3.9		0.3	1.0	µg/kg	B213534	S211474
H3C,										
2112258-03	As	Biota	AR	2.8	J	0.7	3.2	µg/kg	B220187	S220118
2112258-03	Cd	Biota	AR	4.0		0.4	1.0	µg/kg	B213534	S211474
2112258-03	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-03	Pb	Biota	AR	3.8		0.3	1.0	µg/kg	B213534	S211474
H4Z,										
2112258-04	As	Biota	AR	0.8	J	0.7	3.2	µg/kg	B220187	S220118
2112258-04	Cd	Biota	AR	0.5	J	0.4	1.0	µg/kg	B213534	S211474
2112258-04	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-04	Pb	Biota	AR	1.1		0.3	1.0	µg/kg	B213534	S211474
H5Z,										
2112258-05	As	Biota	AR	1.2	J	0.7	3.2	µg/kg	B220187	S220118
2112258-05	Cd	Biota	AR	0.7	J	0.4	1.0	µg/kg	B213534	S211474
2112258-05	Hg	Biota	AR	≤ 0.6	U	0.6	3.2	µg/kg	B213534	S211474
2112258-05	Pb	Biota	AR	0.9	J	0.3	1.0	µg/kg	B213534	S211474
H6Z,										
2112258-06	As	Biota	AR	1.0	J	0.7	3.2	µg/kg	B220187	S220118
2112258-06	Cd	Biota	AR	0.6	J	0.4	1.0	µg/kg	B213534	S211474
2112258-06	Hg	Biota	AR	≤ 0.6	U	0.6	3.4	µg/kg	B213534	S211474
2112258-06	Pb	Biota	AR	1.2		0.3	1.0	µg/kg	B213534	S211474



Sample Results

Sample	Analyte	Report Matrix	Basis	Result	Qualifier	MDL	MRL	Unit	Batch	Sequence
H7V,										
2112258-07	As	Biota	AR	4.8		0.7	3.2	µg/kg	B220187	S220118
2112258-07	Cd	Biota	AR	6.7		0.4	1.0	µg/kg	B213534	S211474
2112258-07	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-07	Pb	Biota	AR	7.0		0.3	1.0	µg/kg	B213534	S211474
H8V,										
2112258-08	As	Biota	AR	4.9		0.7	3.2	µg/kg	B220187	S220118
2112258-08	Cd	Biota	AR	7.0		0.4	1.0	µg/kg	B213534	S211474
2112258-08	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-08	Pb	Biota	AR	6.5		0.3	1.0	µg/kg	B213534	S211474
H9V,										
2112258-09	As	Biota	AR	5.0		0.7	3.2	µg/kg	B220187	S220118
2112258-09	Cd	Biota	AR	6.5		0.4	1.0	µg/kg	B213534	S211474
2112258-09	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-09	Pb	Biota	AR	7.2		0.3	1.0	µg/kg	B213534	S211474
A1C,										
2112258-10	As	Biota	AR	2.3	J	0.7	3.2	µg/kg	B220187	S220118
2112258-10	Cd	Biota	AR	3.5		0.4	1.0	µg/kg	B213534	S211474
2112258-10	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-10	Pb	Biota	AR	3.9		0.3	1.0	µg/kg	B213534	S211474
A2C,										
2112258-11	As	Biota	AR	2.7	J	0.8	3.3	µg/kg	B220187	S220118
2112258-11	Cd	Biota	AR	3.3		0.4	1.0	µg/kg	B213534	S211474
2112258-11	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-11	Pb	Biota	AR	4.1		0.3	1.0	µg/kg	B213534	S211474
A3C,										
2112258-12	As	Biota	AR	2.4	J	0.8	3.3	µg/kg	B220187	S220118
2112258-12	Cd	Biota	AR	4.0		0.4	1.0	µg/kg	B213534	S211474
2112258-12	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-12	Pb	Biota	AR	3.8		0.3	1.0	µg/kg	B213534	S211474



Sample Results

Sample	Analyte	Report Matrix	Basis	Result	Qualifier	MDL	MRL	Unit	Batch	Sequence
A4Z,										
2112258-13	As	Biota	AR	≤ 0.8	U	0.8	3.3	µg/kg	B220187	S220118
2112258-13	Cd	Biota	AR	0.7	J	0.4	1.0	µg/kg	B213534	S211474
2112258-13	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-13	Pb	Biota	AR	1.1		0.3	1.0	µg/kg	B213534	S211474
A5Z,										
2112258-14	As	Biota	AR	≤ 0.8	U	0.8	3.3	µg/kg	B220187	S220118
2112258-14	Cd	Biota	AR	0.5	J	0.4	1.0	µg/kg	B213534	S211474
2112258-14	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-14	Pb	Biota	AR	0.9	J	0.3	1.0	µg/kg	B213534	S211474
A6Z,										
2112258-15	As	Biota	AR	≤ 0.8	U	0.8	3.3	µg/kg	B220187	S220118
2112258-15	Cd	Biota	AR	0.5	J	0.4	1.0	µg/kg	B213534	S211474
2112258-15	Hg	Biota	AR	≤ 0.6	U	0.6	3.2	µg/kg	B213534	S211474
2112258-15	Pb	Biota	AR	1.0	J	0.3	1.0	µg/kg	B213534	S211474
A7V,										
2112258-16	As	Biota	AR	4.6		0.7	3.2	µg/kg	B220187	S220118
2112258-16	Cd	Biota	AR	6.7		0.4	1.0	µg/kg	B213534	S211474
2112258-16	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-16	Pb	Biota	AR	7.1		0.3	1.0	µg/kg	B213534	S211474
A8V,										
2112258-17	As	Biota	AR	4.9		0.7	3.2	µg/kg	B220187	S220118
2112258-17	Cd	Biota	AR	6.1		0.4	1.0	µg/kg	B213534	S211474
2112258-17	Hg	Biota	AR	≤ 0.6	U	0.6	3.3	µg/kg	B213534	S211474
2112258-17	Pb	Biota	AR	6.5		0.3	1.0	µg/kg	B213534	S211474
A9V,										
2112258-18	As	Biota	AR	5.3		0.7	3.2	µg/kg	B220187	S220118
2112258-18	Cd	Biota	AR	6.4		0.4	1.0	µg/kg	B213534	S211474
2112258-18	Hg	Biota	AR	≤ 0.6	U	0.6	3.2	µg/kg	B213534	S211474
2112258-18	Pb	Biota	AR	14.9		0.3	1.0	µg/kg	B213534	S211474



Accuracy & Precision Summary

Batch: B213534
 Lab Matrix: Biota
 Method: AOAC 2015.01, Mod

Sample	Analyte	Native	Spike	Result	Units	REC & Limits	RPD & Limits
B213534-BS1	Blank Spike, (2123063)						
	Cd		99.98	102.6	µg/kg	103% 75-125	
	Hg		100.1	113.2	µg/kg	113% 75-125	
	Pb		99.94	111.5	µg/kg	112% 75-125	
B213534-SRM1	Reference Material (2123018, NIST 1547 - Peach Leaves)						
	Cd		26.10	21.34	µg/kg	82% 75-125	
	Hg		31.70	28.35	µg/kg	89% 75-125	
	Pb		869.0	785.7	µg/kg	90% 75-125	
B213534-SRM2	Reference Material (2123018, NIST 1547 - Peach Leaves)						
	Cd		26.10	21.84	µg/kg	84% 75-125	
	Hg		31.70	27.01	µg/kg	85% 75-125	
	Pb		869.0	763.5	µg/kg	88% 75-125	
B213534-DUP3	Duplicate, (2112256-03)						
	Cd	11.39		10.23	µg/kg		11% 30
	Hg	ND		ND	µg/kg		N/C 30
	Pb	2.01		1.83	µg/kg		9% 30
B213534-MS3	Matrix Spike, (2112256-03)						
	Cd	11.39	32.84	38.17	µg/kg	82% 70-130	
	Hg	ND	32.89	28.89	µg/kg	88% 70-130	
	Pb	2.01	32.83	33.24	µg/kg	95% 70-130	
B213534-MSD3	Matrix Spike Duplicate, (2112256-03)						
	Cd	11.39	33.19	40.49	µg/kg	88% 70-130	7% 30
	Hg	ND	33.24	28.72	µg/kg	86% 70-130	2% 30
	Pb	2.01	33.18	33.25	µg/kg	94% 70-130	1% 30
B213534-DUP4	Duplicate, (2112264-01)						
	Cd	ND		ND	µg/kg		N/C 30
	Hg	ND		ND	µg/kg		N/C 30
	Pb	ND		ND	µg/kg		N/C 30



Accuracy & Precision Summary

Batch: B213534
 Lab Matrix: Biota
 Method: AOAC 2015.01, Mod

Sample	Analyte	Native	Spike	Result	Units	REC & Limits	RPD & Limits
B213534-MS4	Matrix Spike, (2112264-01)						
	Cd	ND	33.04	31.47	µg/kg	95% 70-130	
	Hg	ND	33.09	27.91	µg/kg	84% 70-130	
	Pb	ND	33.03	30.92	µg/kg	94% 70-130	
B213534-MSD4	Matrix Spike Duplicate, (2112264-01)						
	Cd	ND	33.75	32.27	µg/kg	96% 70-130	0.4% 30
	Hg	ND	33.80	30.18	µg/kg	89% 70-130	6% 30
	Pb	ND	33.74	32.90	µg/kg	98% 70-130	4% 30



Accuracy & Precision Summary

Batch: B220187
 Lab Matrix: Biota
 Method: AOAC 2015.01, Mod

Sample	Analyte	Native	Spike	Result	Units	REC & Limits	RPD & Limits
B220187-BS1	Blank Spike, (2123063) As		999.4	892.2	µg/kg	89% 75-125	
B220187-SRM1	Reference Material (2123018, NIST 1547 - Peach Leaves) As		62.00	58.83	µg/kg	95% 75-125	
B220187-DUP1	Duplicate, (2112258-01) As	2.66		2.57	µg/kg		3% 30
B220187-MS1	Matrix Spike, (2112258-01) As	2.66	329.4	284.4	µg/kg	86% 70-130	
B220187-MSD1	Matrix Spike Duplicate, (2112258-01) As	2.66	317.3	281.6	µg/kg	88% 70-130	3% 30
B220187-DUP2	Duplicate, (2112258-18) As	5.25		5.01	µg/kg		5% 30
B220187-MS2	Matrix Spike, (2112258-18) As	5.25	322.2	291.6	µg/kg	89% 70-130	
B220187-MSD2	Matrix Spike Duplicate, (2112258-18) As	5.25	318.1	289.0	µg/kg	89% 70-130	0.3% 30



Method Blanks & Reporting Limits

Batch: B213534
Matrix: Biota
Method: AOAC 2015.01, Mod
Analyte: Cd

Sample	Result	Units			
B213534-BLK1	-0.1	µg/kg			
B213534-BLK2	-0.03	µg/kg			
B213534-BLK3	0.1	µg/kg			
B213534-BLK4	0.06	µg/kg			
Average: 0.0			Standard Deviation: 0.1	MDL: 1.3	
Limit: 3.0			Limit: 1.3	MRL: 3.0	

Analyte: Hg

Sample	Result	Units			
B213534-BLK1	0.02	µg/kg			
B213534-BLK2	0.02	µg/kg			
B213534-BLK3	0.02	µg/kg			
B213534-BLK4	-0.04	µg/kg			
Average: 0.0			Standard Deviation: 0.0	MDL: 1.8	
Limit: 10.0			Limit: 1.8	MRL: 10.0	

Analyte: Pb

Sample	Result	Units			
B213534-BLK1	0.4	µg/kg			
B213534-BLK2	0.2	µg/kg			
B213534-BLK3	0.1	µg/kg			
B213534-BLK4	0.2	µg/kg			
Average: 0.2			Standard Deviation: 0.1	MDL: 1.0	
Limit: 3.0			Limit: 1.0	MRL: 3.0	



Method Blanks & Reporting Limits

Batch: B220187

Matrix: Biota

Method: AOAC 2015.01, Mod

Analyte: As

Sample	Result	Units			
B220187-BLK1	0.06	µg/kg			
B220187-BLK2	-0.3	µg/kg			
B220187-BLK3	-0.4	µg/kg			
B220187-BLK4	-0.4	µg/kg			
Average:	-0.3		Standard Deviation:	0.2	MDL: 2.3
Limit:	10.0		Limit:	2.3	MRL: 10.0



Sample Containers

Lab ID: 2112258-01		Report Matrix: Biota				Collected: 12/17/2021	
Sample: H1C		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-02		Report Matrix: Biota				Collected: 12/17/2021	
Sample: H2C		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-03		Report Matrix: Biota				Collected: 12/17/2021	
Sample: H3C		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-04		Report Matrix: Biota				Collected: 12/17/2021	
Sample: H4Z		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-05		Report Matrix: Biota				Collected: 12/17/2021	
Sample: H5Z		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-06		Report Matrix: Biota				Collected: 12/17/2021	
Sample: H6Z		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258



Sample Containers

Lab ID: 2112258-07		Report Matrix: Biota				Collected: 12/17/2021	
Sample: H7V		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-08		Report Matrix: Biota				Collected: 12/17/2021	
Sample: H8V		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-09		Report Matrix: Biota				Collected: 12/17/2021	
Sample: H9V		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-10		Report Matrix: Biota				Collected: 12/17/2021	
Sample: A1C		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-11		Report Matrix: Biota				Collected: 12/17/2021	
Sample: A2C		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-12		Report Matrix: Biota				Collected: 12/17/2021	
Sample: A3C		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258



Sample Containers

Lab ID: 2112258-13		Report Matrix: Biota				Collected: 12/17/2021	
Sample: A4Z		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-14		Report Matrix: Biota				Collected: 12/17/2021	
Sample: A5Z		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-15		Report Matrix: Biota				Collected: 12/17/2021	
Sample: A6Z		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-16		Report Matrix: Biota				Collected: 12/17/2021	
Sample: A7V		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-17		Report Matrix: Biota				Collected: 12/17/2021	
Sample: A8V		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258
Lab ID: 2112258-18		Report Matrix: Biota				Collected: 12/17/2021	
Sample: A9V		Sample Type: Sample				Received: 12/22/2021	
Des	Container	Size	Lot	Preservation	P-Lot	pH	Ship. Cont.
A	Client-Provided	N/A	N/A	None	N/A	N/A	Cardboard Box - 2112258

Project ID: NYA-NY2101
PM: Adam Palik



BAL REPORT 2112258, Revision 2
Client PM: NYSOAG
Client Project: NYA-NY1901-R1

Shipping Containers

Cardboard Box - 2112258

Received: December 22, 2021 11:10
Tracking No: 1Z 194 871 01 1029 1062 via UPS
Coolant Type: None
Temperature: Ambient

Description: Cardboard Box
Damaged in transit? No
Returned to client? No
Comments: N/A

Custody seals present? No
Custody seals intact? No
COC present? Yes