

Incident Report Review

Report Number: 20230128-D3DF9-2147351113

Who you are: Public Safety Entity

Step 1: What Happened

What Happened:

Repeated (replicable) scientific testing (conducted by Lead Safe Mama, LLC - a woman -owned small business based in Portland, Oregon - focused on independent consumer goods testing using XRF technology) has determined that both coated (nylon coated - in white or gray coatings) and uncoated ("burnished" bare aluminum) KitchenAid attachments (to their stand mixers, all makes and models, all years of manufacture) have unsafe levels of Lead when considered to be items intended for use by children / when evaluated by the current CPSIA standards for items intended for use by children. These items typically test positive for Lead levels at 300 ppm and above (often in the 600+ ppm range and as high as 2000 ppm or higher) - which when compared to the CPSC regulatory limit of 100 ppm Lead in the substrate of items intended for use by children is concerning (and would be illegal if you determine - as we have - that these products are clearly sold by KitchenAid as items intended for use by children.) ITEMS MARKETED AS INTENDED FOR USE BY CHILDREN AND SAFE FOR USE BY CHILDREN: The presence of Lead (at the levels found) in these products is specifically concerning and relevant to the CPSIA regulatory standards as KitchenAid has been expressly and intentionally (knowingly) marketing these items as safe for (and intended for) use by very young children now (via recent marketing campaigns on their social media channels - including Instagram) and across decades past in their marketing efforts. While one might argue that kitchenware products should not be evaluated or held to the same standards as items intended for use by children (under current regulatory standards) it is the position of Lead Safe Mama, LLC and the Lead Safe Mama online advocacy community that these KitchenAid products should be an exception to that limitation of the CPSIA (when it comes to specific limits for total XRF-detectable Lead content in consumer goods) because of the marketed, known and 100+ year enculturated understanding that KitchenAid brand kitchen products are safe for use by the whole family, including children. To this end (noting you may consider this an exception), earlier this week we created a Change dot org petition in support of this violation report - which now has over 5,000 signatures from concerned citizens who agree that KitchenAid has marketed and sold these items as safe for use by the youngest children (and specifically that the consumer's understanding based on KitchenAid's marketing is that these products are safe for use by children and intended for use by children) and that KitchenAid should be held accountable with that context at the forefront of any CPSC considerations when evaluating whether or not to demand a formal recall for the products mentioned here. As of the moment of submitting this violation report - Saturday, January 28, 2023 - 10:00 a.m. EST) the Change dot org petition currently has 5,175 signatures. We ask that you please take the time to read and document the comments (noted on the petition) from concerned citizens who have signed this petition. Here is the link to the petition: https://www.change.org/p/demand-for-kitchenaid-whirlpool-to-stop-manufacturing-selling-lead-contaminated-products?recruiter=7021750&recruited_by_id=583babf0-162f-0130-7200-3c764e049c4f&utm_source=share_petition&utm_campaign=share_for_starters_page&utm_medium=copylink

COATED & BURNISHED PADDLES - ALL YEARS OF MANUFACTURE: Recent independent XRF testing (using a calibrated and newly factory refurbished Niton XL3T XRF instrument) confirmed concerning levels in their products sold (at Walmart) as recently as last month - December of 2022. Testing has also confirmed the presence of unsafe levels of Lead in KitchenAid's cast aluminum stand mixer attachments in product sold in ALL YEARS since the CPSC set these levels (as a determining factor in evaluating the safety of items intended for use by children) in 2008. These products (KitchenAid aluminum stand mixer attachments) consistently (with rare exceptions) have unsafe levels of Lead across all years of manufacture prior to 2008 as well, but given the only applicable regulation for enforcement is the CPSIA of 2008, we understand if you choose only to review potential violations for items intended for use by children that were manufactured after the CPSIA was passed. We are primarily asking you to evaluate the 3-pack of basic

attachments that come with standard mixers (the Dough Hook, Paddle and Whisk - which has a lead-contaminated component where it attaches to the mixer) - as they are most commonly found in homes, but would also appreciate your evaluation (for recall) of other KitchenAid stand mixer attachments as the concern is not limited to the three standard attachments. COATED PADDLES - ALL YEARS OF MANUFACTURE: The company (KitchenAid) asserts that the paddles are safe as long as the coating is intact. The coating wears and chips with normal use / when the product is used as intended - exposing the food being prepared with these attachments to the uncoated Lead-contaminated substrate of these KitchenAid Stand Mixer attachments. It is the understanding and assumption of Lead Safe Mama, LLC that product safety compliance of these products has possibly only been tested with the coating intact (KitchenAid asserts that the items are safe as long as the coating is intact.) Hundreds of Lead Safe Mama dot com readers have reported that their attachment coating has chipped with normal use as intended - even within two or three uses of the product when new (including with newly / recently manufactured products in the past year, 2022). We request further testing be done of the paddles when chipped to determine if they present a Lead contamination hazard to the food prepared (outside of considering the CPSIA violation for total Lead content given the limits of Lead in the substrate of items intended for use by children.) BURNISHED PADDLES - ALL YEARS OF MANUFACTURE: Separately we request that you evaluate if there is an FDA violation or a CPSC violation under a different component of currently enforceable legislation (which could warrant a separate recall) for the KitchenAid stand mixer attachments made of what KitchenAid is calling "Burnished" aluminum. Hundreds of Lead Safe Mama dot com readers have reported that this type of KitchenAid attachments leaves black residue (exuded from the bare / uncoated / confirmed-to-be-Lead-contaminated surface of the attachments) in the food as it is prepared in their stand mixers. These KitchenAid stand mixer attachments also typically test positive for levels of Lead (on the surface of these uncoated paddles) in excess of 500 ppm or higher. It is our understanding that KitchenAid has stopped selling these items, but they are still in daily use in thousands (tens of thousands?) of homes across the United States. As such, we have a very real concern for the potential for these paddles to contaminate the food prepared in the KitchenAid stand mixers as a result of the Lead Levels found, combined with the corrosion of the surface of these items when used as intended (or as expected by any consumer.) We expect that this may be one reason KitchenAid stopped selling these paddles, but are concerned as no recall was ever issued by the company (concurrent with the cessation of the sale of the product) and we would appreciate if the CPSC or other relevant agency would evaluate these specific products for recall given those considerations. If you need examples of any of the above products to evaluate, we have dozens that we have collected from U.S. citizens that demonstrate the above noted concern (and we can easily collect more.) I also expect you can likely just grab examples from your own kitchens given how ubiquitous these products are (as it seems that every family has at least one of these appliances.) I also invite you to read the text of the Change dot org petition which further discusses the concerns for these products and emphasizes the fact that generations of families have used these with their children with the knowledge (supported by KitchenAid's marketing campaigns over the past century) that these items are safe for use by children and intended for use with and by children. In light of misinformation on social media and in the news, we think it is important to note here that information provided by Lead Safe Mama, LLC in this report is legitimate and actionable as evidenced by the fact that the CPSC has previously acted on information from independent testing conducted by Lead Safe Mama, LLC to support THREE CPSC product recalls that were announced in 2022: 1. the Jumping Jumperoo toy (Lead Paint), 2. The NUK glass baby bottle with star design (Lead Paint), and 3. The Green Sprouts stainless steel insulated baby bottle / sippy cup (high-Lead component accessible to children with commonly anticipated product design failure.) We also ask that in publishing this report (and in publishing notices of any recalls generated as a result of this report) that you not redact our business name as - in redacting our name - you strip credibility from the work of a woman-owned small business, a business that has been consistently supporting the CPSC in their work identifying unsafe consumer goods since we incorporated as an LLC in 2018 (and for more than a decade before that.) While there is no specific injury or incident with a specific person to report regarding these products, it would be nearly impossible to determine the number of people harmed by the potential for Lead exposure from trace contamination of food prepared with these products without further testing. Further evaluation is needed to determine injury and number of people potentially injured. Our request at this time is for recalls and evaluation on compromised products to PREVENT future injury through Lead exposure, especially for

young children and also to press the company into making and selling only LEAD FREE food-contact components. Thank you.

When it happened:

12/13/2022

Where it Happened: Other Public Property/Office

The address where it happened:

7933 SE 15th Avenue

Portland

Oregon

97202

United States

[Step 2: Tell Us About the Product](#)

Describe the product

See full description in first section of violation report. The concern is for burnished aluminum and nylon coated aluminum attachments for KitchenAid Stand Mixers (with both white or gray/tan coating or with no coating).

Brand name: KitchenAid

Manufacturer/ Importer/ Private Labeler Name: Whirlpool

Please provide Model Name or Number: All models of aluminum attachments for KitchenAid

Serial Number: All

SKU#: All

UPC Code: ALL

Date Manufactured: 11/1/2022

Manufacturer Date Code: ALL YEARS

Upload photos or documents related to the product, damage, or injuries

- burnished.png, , 505.056KB
 - KitchenAid.png, , 1195.849KB
 - kids.png, , 1458.722KB
 - burnished 1.png, , 1360.306KB
-

Address on the product

Website On Product:

KitchenAid.com

Telephone Number on the product:

1 (800) 541-6390

Still have the product:

Yes

Product was damaged or modified:

No

Explanation of damage/modification:

see initial summary and petition

Contacted the manufacturer:

Yes

Step 3: Tell Us Who Was Involved

Person #1

Injury Information:

Incident, No Injury

Relationship to me:

Years:

Months:

0

Date of Death:

First Name:

Last Name:

Email:

Phone Number:

Gender:

Races:

Hispanic/Latino:

Address:

Step 3.5: Tell Us the Case Details

What is the case number:

KitchenAid2023

Case Documents/Photos:

File Name	Description	Size
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burnished.png	505.056KB
KitchenAid.png	1195.849KB
kids.png	1458.722KB
burnished 1.png	1360.306KB

Who are the Principal Investigator(s) of the case you are reporting:

Tamara Rubin, Owner - Lead Safe Mama, LLC

Step 4: Tell Us How to Contact You

First Name:

Tamara

Last Name:

Rubin

Organization / Agency:

Lead Safe Mama, LLC

Email Address: tamararubin@mac.com

Phone Number: 415-609-3182

Address:

7933 SE 15th Avenue

Portland

Oregon

97202

May we release your name and contact information to the product manufacturer / importer / private labeler?

Yes