

Chapter 6: rBGH-free Dairies

Introduction

Recombinant Bovine Growth Hormone (rBGH or rBST) is a genetically engineered drug produced by the Monsanto Corporation. It is injected into dairy cows and induces them to increase milk production by 5-15%.

The FDA approved rBGH in November 1993 amidst widespread criticism from government leaders and scientists (including many inside the FDA) who questioned the objectivity of the approval process. In reviewing the scientific evidence, both Canadian and European scientists concluded that significant questions and problems remain regarding human health and animal welfare.

Based on this evidence, all 25 nations of the European Union have banned rBGH, as have Canada, Australia, New Zealand and Japan. In fact, most industrialized nations of the world have disallowed its use. The U.N. food safety organization, Codex Alimentarius, has declined three times to declare the drug safe.

In the United States, awareness of the dangers of rBGH is growing, and concerned citizens across the country are moving their local dairies to go rBGH-free. Many consumers in Maine have refused to buy dairy products from rBGH-treated cows that there is virtually no milk sold there from cows that have received it. In northern California, most dairy farmers and dairies have also stopped using the drug in response to consumer demand. Efforts to educate the public around the hazards of rBGH and persuade decision makers against rBGH have been successful thanks to the efforts of GEAN affiliates, including the Center for Food Safety, the Organic Consumers Association, and Consumers Union.

In Oregon, a campaign spearheaded by the Oregon Physicians for Social Responsibility is moving dairy after dairy to make an rBGH-free pledge. Rick North from Oregon Physicians for Social Responsibility (Oregon PSR) has put together incredible resources for individuals and groups that want to run campaigns to move their own local dairies to stop using rBGH.

This campaign is a great choice for grassroots groups. It includes specific jobs for a variety of volunteers, from research and fact-finding to negotiating with companies and doing media work, the bulk of the materials you need to run the campaign have already been developed, and they are winnable. This is a great way to educate your community about some of the dangers of genetically engineered products, to change the corporate practices of some of the businesses in your community, and to bolster your group with concrete, achievable goals.

The power of your success in moving your local dairies to make an rBGH-free commitment will grow immeasurably when you share it in the media. News stories will help organizers in other communities feel inspired, and it will show dairies across America that rBGH is soon to be a product of the past.

This chapter of the toolkit provides resources for an rBGH-free dairies campaign, information about rBGH from experts, and literature to use or adapt in your community. For example, the position statement from Health Care Without Harm, an international coalition working to transform the health care industry, provides compelling evidence on the health hazards of rBGH. If you choose to launch this campaign, please contact GEAN at info@geaction.org or Rick North with Oregon PSR at 503-968-1520, or hrnorth@hevanet.com.

Campaign Steps

First-tier steps in the campaign:

The first steps for an rBGH-free dairies campaign are similar to other campaigns, and are based on gathering important information and support of key allies.

- 1. Contact Rick North at Oregon PSR** (hrnorth@hevanet.com) or GEAN (info@geaction.org) for campaign strategy support and guidance;
- 2. Ask a local insider in the dairy industry** to give you advice, preferably someone that works for or previously worked for an rBGH-free dairy;
- 3. Obtain the names and contact information of all dairies** based in the state, and whether they allow rBGH;
- 4. Obtain the names, contact information, and what milk brands are served** in your state:
 - a. hospitals;
 - b. colleges, including community colleges;
 - c. school districts, including parochial/private;
 - d. coffee shops/restaurants.

Second-tier steps in the campaign:

Once you have done this initial fact-finding work to prepare for your campaign, there are a number of steps you can take to start moving your local dairy(ies) to go rBGH-free. Strategies will vary depending upon your location, local dairy situation, other groups willing to help, materials you wish to produce, number and type of volunteers, and, of course, finances. Here are some suggestions of activities that can help your campaign be a success.

- 1. Educate your community.** Spread the word about the hazards of rBGH through presentations to community groups, including clubs, schools, and religious institutions. rBGH has absolutely nothing to offer but increased disease rates in cows and possible health risks to humans--the only reason it is still on the market is that consumers don't know about it. The more consumers know about rBGH, the greater the pressure will be on dairies to phase this hormone out of their products. Included in this chapter of the toolkit is a PowerPoint presentation, developed by Oregon Physicians for Social Responsibility, which you can feel free to use and adapt in your own outreach work. Also included is Oregon PSR's 8-page brochure, which is applicable for any location in the country. It is also available on the website at www.oregonpsr.org.
- 2. Contact institutions that buy dairy products** such as hospitals, restaurants, coffee shops, schools, grocery stores, and catering companies. Try and schedule meetings or presentations with the people who make buying decisions at those institutions to share your information about rBGH with them. Ask them to change to rBGH-free products for their customers.
- 3. Contact dairies directly** and ask them to go rBGH-free. Schedule meetings and presentations with dairy representatives, and let them know why it's so important for them to stop using rBGH.

4. Build consumer pressure on dairies: Included in this chapter is a postcard concerned consumers can sign and send in to your target dairy. Hearing from customers is a powerful motivator for dairies to make responsible decisions on rBGH. Organize a postcarding day with a group of volunteers—you can set up a table at a film showing, fair, or in front of a local organization or business and ask passers by to sign postcards, which you can then collect and send in to the dairy yourself. Also be sure to bring these postcards with you when making presentations to local groups so people can sign them right then and there. The more postcards you can collect and send to the companies still using rBGH, the greater your chances will be of moving them to make an rBGH-free commitment.

The rBGH Elevator Speech

An “elevator speech” is one in which you can quickly tell someone what you’re doing, capturing the essence of your activity and giving your most powerful points in a few brief statements.

Before starting the rBGH-Free Oregon Campaign, Oregon PSR polled over 100 people to determine what issues resonated the most. These were the top ones:

1. rBGH is associated with possible higher cancer rates in humans
2. Most industrialized nations of the world have banned rBGH.
3. rBGH is harmful to cows’ health, increasing their disease rates.

Since rBGH is unknown to most Americans, you must begin with a definition. Here is a sample elevator speech:

“rBGH is a genetically engineered growth hormone injected into cows that makes them give more milk. It’s also known as rBST. About 10-15% of dairy cows in Oregon are given this drug. Most industrialized countries in the world, including Canada and all 25 nations of the European Union, have banned the hormone, primarily because it increases disease rates in cows and may be linked to increasing cancer rates and antibiotic resistance in humans.

The Oregon Physicians for Social Responsibility has started the rBGH-Free Oregon Campaign to educate the public about rBGH. For more information, you can check their website at www.oregonpsr.org.”

Oregon PSR suggests you use whatever wording you find comfortable, but strongly recommend you include these main points. If you have time, you can add other details that are found on the rBGH-Free Oregon Campaign Fact Sheet.

rBGH-free Oregon Campaign Fact Sheet

Physicians for Social Responsibility (PSR), Oregon Chapter

Definition: Recombinant Bovine Growth Hormone (rBGH or rBST) is a genetically engineered drug produced by the Monsanto Corporation. It is injected into dairy cows and induces them to increase milk production by 5-15%. It's estimated that 20-25% of the cows in Oregon are given this drug.

Background: The FDA approved rBGH in November 1993 amidst widespread criticism from government leaders and scientists (including many inside the FDA) who questioned the objectivity of the approval process. In reviewing the scientific evidence, both Canadian and European scientists concluded that significant questions and problems remain regarding human health and animal welfare.

Based on this evidence, all 25 nations of the European Union have banned rBGH, as have Canada, Australia, New Zealand and Japan. In fact, most industrialized nations of the world have disallowed its use. The U.N. food safety organization, Codex Alimentarius, has declined three times to declare the drug safe.

In the U.S., so many consumers in Maine have refused to buy dairy products from rBGH-treated cows that there is virtually no milk sold there from cows that have received it. In northern California, most dairy farmers and dairies have also stopped using the drug in response to consumer demand.

The problems with rBGH:

- Increased cancer risk: When rBGH is injected into a cow, it elevates levels of another powerful growth hormone, IGF-1, which in excessive amounts has been linked in hundreds of studies to an increase in breast, prostate, colon, lung and other cancers in humans. Numerous scientific studies suggest IGF-1 in milk survives digestion and enters the bloodstream in sufficient quantities to potentially trigger increased cancer rates.
- Antibiotic resistance: Cows given rBGH may experience higher rates of mastitis, a painful udder infection. Mastitis is commonly treated with antibiotics such as penicillin, amoxicillin and erythromycin, which are also used to treat infections in humans. Bacteria resistant to these antibiotics can pass into humans through dairy products. This can result in increased antibiotic resistance in humans, a major health problem that is worsening each year.
- Harm to cows: In addition to mastitis, rBGH has been demonstrated to increase the incidence of 16 different harmful effects in cows, including birth disorders, increased pus in milk, hoof problems, heat stress, diarrhea, and other gynecological and gastrointestinal disturbances.

Labeling: The FDA ruled that dairy products from cows treated with rBGH are not required to be labeled. Consequently, most people that consume these products don't realize it. However, some dairies label their products rBGH-, rBST- or artificial hormone-free. Also, certified organic dairy products, by definition, don't come from cows treated with rBGH.

What you can do: Avoid unnecessary risks to your health by checking the labels and buying only dairy products free from rBGH-treated cows. Contact supermarkets and schools to support the use and sale of rBGH-free products. You can also sign up for our e-mail update list to learn more and stay current on the campaign.

PSR's Goal: Discontinue the production of any dairy products within Oregon from cows treated with rBGH. This will be done through a wide-ranging grass roots consumer education and action campaign.

To find out how you can help, or for more information: Contact Rick North, Project Director, at 503-968-1520 or hnrnorth@hevanet.com or visit <http://www.oregonpsr.org/programs/campaignSafeFood.html>

(SEE REVERSE SIDE FOR DOCUMENTATION)

DOCUMENTATION

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Giovannucci E. et al, A prospective study of plasma IGF-1 and binding protein-3 and risk of colorectal neoplasia in women, Cancer Epidemiology, Biomarkers & Prevention, 2000, 9:345-349.

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Sample Letter/E-mail to Dairy Using rBGH

Dear _____:

I have just learned that you use milk from cows injected with recombinant bovine growth hormone (rBGH).

(IF TRUE) Because you are using this hormone, I have stopped buying your products and switched to _____, a dairy that is rBGH-free. In addition (AGAIN, ONLY IF TRUE), I have told people I know (my sister, parents, next-door neighbor, etc.) about this hormone and recommended they consider rBGH in their dairy purchasing decisions.

I have a number of reasons for avoiding your dairy products and believe the FDA has made a serious mistake in allowing this hormone to be used in the U.S. According to the Oregon Physicians for Social Responsibility:

rBGH in cows' milk elevates the levels of another growth hormone which in excessive amounts has been linked in numerous studies to promotion of increased cancer rates in humans.

rBGH has been shown to increase disease rates in cows, including painful mastitis. The use of this drug has been condemned by both the U.S. Humane Society and Humane Farming Association.

The treatment of this increased mastitis by antibiotics can create antibiotic-resistant bacteria, some of which can pass into humans. This may lead to increased antibiotic resistance, a very serious medical problem.

Canada, Australia, New Zealand, Japan and all 25 nations of the European Union have banned the use of this hormone, primarily based on animal health grounds and concerns about human health.

I would very much appreciate it if you would stop using this hormone in cows supplying your milk. Thank you for your consideration.

I would also appreciate a written response to my letter (or e-mail).

Sincerely,

Your name

P.S. (IF TRUE) I estimate that I used to spend \$____ per (month, year) on your products. I enjoyed them but will not go back to them as long as you are using rBGH.

Consumers' Guide to rBGH-free Dairy Products

The Organic Consumers Association maintains a list of sources for rBGH-free dairy products, which we've included below. This isn't a complete list of all the dairies in the country that have rBGH-free products, and it is changing all the time, as more communities move their local dairies to go rBGH-free, so please see <http://www.organicconsumers.org/rBGH/rbghlist.cfm> for the most current list.

Feel free to take sections of this list and make a local buyer's guide for your state or region. Also, be sure to call your local dairies and ask them about their policies on rBGH for a more comprehensive and accurate list of rBGH-free products in your community. When you call your dairies, express your concern about rBGH, and offer to come make a presentation about the dangers of rBGH if they have not yet made an rBGH-free commitment.

rBGH-free (Organic)

These milk and dairy companies carry some or all organic products.

*** indicates that it comes from a family farm**

Available Nationwide

- Alta Dena Organics (Cheese), City of Industry, CA, 800/535-1369, available nationwide.
- Horizon Organic Dairy (Milk, Chocolate Milk, Cream, Whipped Cream, Yogurt, Cheese, Butter, Sour Cream, Cottage Cheese, Cream Cheese), Boulder, CO, 888/494-3020, available nationwide
- Morningland Dairy Cheese*, Mountain View, MO, 417/469-3817, available nationwide and by mail order.
- Organic Valley* (Milk, Cheese, Butter, Cream Cheese, Cottage Cheese, Sour Cream, Cream, Powdered Milk), La Farge, WI, 608/625-2600, <http://www.organicvalley.com>, available nationwide.
- Stonyfield Farms (organic line) (Yogurt and Ice Cream), Londonderry, NH, 603/437-4040, available nationwide.
- Wisconsin Organics* (Milk, Cheese, Butter), Bonduel, WI, 715/758-2280, available nationwide and at their own retail store in Bonduel.

California

- Straus Family Creamery* (Milk, Butter, Yogurt, Cheese), Marshall, CA, 415/663-5464, <http://www.strausmilk.com>, available in California, Arizona, and New Mexico.
- Alta Dena Organics (Cheese), City of Industry, CA, 800/535-1369, available nationwide.
- Stremick's Heritage Foods, LLC (distributes throughout Western U.S.)
<http://www.stremicksheritagefoods.com>

Colorado

- Horizon Organic Dairy (Milk, Chocolate Milk, Cream, Whipped Cream, Yogurt, Cheese, Butter, Sour Cream, Cottage Cheese, Cream Cheese), Boulder, CO, 888/494-3020, available nationwide.

Iowa

- Radiance Dairy* (Milk, whipping cream, yogurt, and several cheese), Fairfield, IA, 641-472-8554, available at Hy-Vee, Econo Foods, and Everybody's Whole Foods in the Fairfield area and at New Pioneer Co-op in Iowa City.

Indiana

- Trader's Point Creamery (certified organic, rBGH-free, grassfed milk, cheese and yogurts) 9101 Moore Road, Zionsville, IN 46077 www.tpfororganics.com 317-733-1700

Maine

- Hart-to-Hart Farm* (Cheese and licensed Raw Milk), Albion, ME, 207/437-2441, available at the farm and at farmers' markets throughout central Maine (call for locations).
- Nezinscot Farm* (Cow's or Goat's Milk, Cheese, Butter), Turner, ME, 207/225-3231, available at their own store in Turner; cheese available by mail order.

Massachusetts

- Bart's Homemade (Low-Fat Organic Ice Cream), Greenfield, MA, 413/774-7438, available in Massachusetts, New Hampshire, Connecticut, and at their own store in Greenfield.
- Brookside Farm* (Milk and Cream), Westminster, MA, 978/874-2695, available in Massachusetts.

Missouri

- Morningland Dairy Cheese*, Mountain View, MO, 417/469-3817, available nationwide and by mail order.

Montana

- Lifeline Farms (Cheese)*, Victor, MT, available on the West Coast. For store locations, call Mountain Peoples, 800/679-8735, <http://www.csf.Colorado.edu/co-op/mountain.html>.

New Hampshire

- Stonyfield Farms (organic line) (Yogurt and Ice Cream), Londonderry, NH, 603/437-4040, available nationwide.

New York

- Hawthorne Valley Farm* (Cheese, Yogurt and Quark Cheese), Ghent, NY, 518/672-7500, available on the East Coast. Raw milk and cheese also available at their own local store and at the Union Square Farmers' Market in New York City.
- Butternut Farms* (Cheese), NY, 607/783-2392, <http://www.butternutfarms.com>, available in the Northeast and by mail order.
- Natural by Nature (Cheese, Cream, Buttermilk, Eggnog, Ice Cream, Butter, Yogurt, Cream Cheese, Milk, Pudding), Sunnydale Farms, Brooklyn, NY, 718/257-7600, available on the East Coast and in the Midwest.

Oregon

- Echo Spring Dairy (organic line) (Milk, Sour Cream, Cottage Cheese), Eugene, OR, 541/753-7331, available in Idaho, Oregon, and northern California.

Pennsylvania

- Kimberton Hills Farm* (licensed Raw Milk), Kimberton, PA, available at Kimberton Whole Foods Store (610/935-1444) and at the farm (610/935-0314).
- Seven Stars Farm* (Yogurt), Phoenixville, PA 610/935-1949, available in the East and Midwest.

Vermont

- ORGANIC BUTTER: Animal Farm Butter, Orwell, VT, 802-623-6599, <http://www.animalfarmvt.com/> available at Middlebury Natural Food Coop in Middlebury, VT
- Butterworks Farm* (Yogurt, Cream, Cheese, Cottage Cheese), Westfield, VT, 802/744-6855, available in the Northeast and at the farm; cheese also available by mail order.
- Organic Cow of Vermont (Milk, Chocolate Milk, Sour Cream, Cottage Cheese, Butter, Cream, Eggnog), Chelsea, VT, 800/769-9693, available on the East Coast.

Washington

- Greenbank Farms Cheese (organic line), Stonefelt Cheese Co., Preston, WA, 425/222-5500, available on the West Coast, in the Northwest, and at their own store in Preston.

Wisconsin

- Ranovael Organic Dairy* (Cheese, Butter), DePere, WI, 920/336-2820, cheese available by mail order, both products available at their own store in DePere.

- Cedar Grove Organic Cheese, Plain, WI, 608/546-5284, www.cedargrovecheese.com, available in the Upper Midwest, at their own store in Plain, and by mail order (877/275-8354). Mail@cedargrovecheese.com
- Organic Valley* (Milk, Cheese, Butter, Cream Cheese, Cottage Cheese, Sour Cream, Cream, Powdered Milk), La Farge, WI, 608/625-2600, <http://www.organicvalley.com>, available nationwide.
- Wisconsin Organics* (Milk, Cheese, Butter), Bonduel, WI, 715/758-2280, available nationwide and at their own retail store in Bonduel.

rBGH-free (but not organic) Brands

These milk and dairy companies carry some or all rBGH-free products.

Available Nationwide

- Alta Dena (Milk, Buttermilk, Chocolate Milk, Eggnog, Cream, Sour Cream, Yogurt, Natural Select Butter, Ice Cream, Cottage Cheese, and all Cheeses except for cream cheese), City of Industry, CA, 800/MILK123, available nationwide.
- Ben & Jerry's Ice Cream, S. Burlington, VT, 802/846-1500, <http://www.benjerry.com/ca/> available nationwide
- Biazzo Dairy Products (Cheese), Riverfield, NJ, 201/941-6800, available nationwide.
- Brown Cow Farm (Yogurt and Milk), Antioch, CA, 925/757-9209, <http://www.wholemilkyyogurt.com>, available nationwide.
- Cascade Fresh (yogurt) Available nationwide. rBGH-Free, antibiotic and steroid free. For store locations, look on our web site www.cascadefresh.com or call 800.511.0057.
- Crowley Cheese of Vermont, Healdville, VT, 802/259-2210, <http://www.newenglandcheese.com/companies/crowley.html>, available nationwide and by mail order.
- Egg Farm Dairy (Butter, Cheese, Ice Cream, Cream), Peekskill, NY, 800/CREAMERY, available at their local retail store, by mail order, and nationwide at gourmet food stores.
- Family Farms Defenders*, (Cheese), Madison, WI 608-260-0900, available in Madison, WI and nationwide by mail order
- Franklin County Cheese (Bagel Factory Cream Cheese, Shaw's Cream Cheese, Bruegger's Bagels Cream Cheese—eastern US only, All Seasons Kitchen @, Lombardi's - Cream Cheese and Mascarpone, Vermont Butter and Cheese - Mascarpone), Enosburg Falls, VT, 802/933-4338, www.franklinfoods.com, available nationwide.
- Grafton Village Cheese, Grafton, VT, 800/472-3866, 802/843-2221, <http://www.graftonvillagecheese.com> available nationwide and by mail order.
- Great Hill Dairy (Cheese), Marion, MA, 508/748-2208, <http://www.greathillblue.com>, available by mail order or nationwide at gourmet stores.
- Kate's Homemade Butter, Old Orchard Beach, ME, 207/934-5134, available nationwide.
- Land O Lakes' Original (Milk) Arden Hills, MN 651-481-2222 Available nationwide.
- Lifetime Dairy (Cheese), Lifeline Food Co., Seaside, CA, 831/899-5040, <http://www.lifetimefatfree.com>, available nationwide.

- North Farm Cooperative* (Cheese), Madison, WI, 800/236-5880, 608/241/2667, <http://www.northfarm-coop.com>, available nationwide and by mail order.
- Salemville Cheese, North Farm Cooperative, Madison, WI, 800/236-5880, nationwide and by mail order.
- Shelburne Farms Farmhouse Cheddar Cheese*, Shelburne, VT, 802/985-8686, available nationwide, by mail order, and at their own farm-site store.
- Tillamook Dairy is located in Oregon, distributes nationwide and includes web sales here <http://www.tillamookcheese.com/>

California

- Clover Stornetta Farms (Milk, Cheese, Sour Cream, Yogurt), Petaluma, CA, 800/237-3315, <http://www.clo-the-cow.com>, available in northern California.
- Joseph Farms Cheese, Joseph Gallo, Atwater, CA, 209/394-7984, <http://www.josephfarms.com>, available in the Northwest, Southwest, South, and Hawaii.
- Alta Dena (Milk, Buttermilk, Chocolate Milk, Eggnog, Cream, Sour Cream, Yogurt, Natural Select Butter, Ice Cream, Cottage Cheese, and all Cheeses except for cream cheese), City of Industry, CA, 800/MILK123, available nationwide.
- Brown Cow Farm (Yogurt and Milk), Antioch, CA, 925/757-9209, <http://www.wholemilkyogurt.com>, available nationwide.
- Lifetime Dairy (Cheese), Lifeline Food Co., Seaside, CA, 831/899-5040, <http://www.lifetimefatfree.com>, available nationwide.
- Berkeley Farms (Full line of dairy products), Hayward, CA, 510-265-8600, <http://www.berkeleyfarms.com>, available in Northern California.

Connecticut

- Rustling Winds Creamery (Cheese, Milk but bring your own container), Falls Village, CT, 860/824-7084, available at their farm store; cheese available by mail order.
- Calabro Cheese Corp., East Haven, CT, 203/469-1311, <http://www.calabrocheese.com>, available on the East and West Coasts and in Ohio.

Florida

- Golden Fleece Dairy*, (Milk), Lecanto, FL, 352.628.2688, available in Florida.

Illinois

- Oberweiss Dairy (Milk and Ice Cream), Aurora, IL, 630/897-6600, available in Illinois.

Louisiana

- Mauthe's Dairy* (Whole Milk, Skim Milk, Creole Cream Cheese), Folsom, LA, <http://www.mauthescreolecreamcheese.com/index.htm>, (985) 796-5058, available in New

Orleans area, Crescent City Farmers Markets, Covington Farmers Markets and on line at <http://www.mauthescreolecreamcheese.com/purchase.htm>

Maine

- Kate's Homemade Butter, Old Orchard Beach, ME, 207/934-5134, available nationwide.

Massachusetts

- Balance Rock Farm (Milk), Berlin, MA, 978/838-2024, available at their farm store in Berlin.
- Brigham's Ice Cream, Arlington, MA, 800/BRIGHAMS, <http://www.brighams.com>, available in the Northeast.
- Crescent Creamery (Milk), Pittsfield, MA, 800/221-6455, available in the Northeast.
- Dorchester Ice Cream, Boston, MA, 617/282-9600, available in the Northeast.
- Great Hill Dairy (Cheese), Marion, MA, 508/748-2208, <http://www.greathillblue.com>, available by mail order or nationwide at gourmet stores.

Michigan

- Crooked Creek Farm Dairy (Milk, Ice Cream), Romeo, MI, 810/752-6095, available at farm dairy store and at select stores in southeast Michigan.
- Jilbert's Dairy (Milk, Ice Cream), Marquette, MI, 906/225-1363, available in Michigan upper peninsula through Wisconsin border.
- Pollard Dairy (Milk, Chocolate Milk, Whipped Cream), Norway, MI, 906/563-8815, Michigan upper peninsula, northeastern Wisconsin.

Minnesota

All of these brand carry a no rBGH or no BST label.

- Sonny's Ice cream (Icecream), Minneapolis, MN 612-822-8189. Available in the Twin Cities metro area and the Chicago area and by phone orders. Sonny's ice cream is currently not labeled. All dairy ingredients are from the Pride of Main Street Dairy.
- Polka Dot Dairy (Milk, Half and half, Whole cream, Buttermilk), Hastings MN, 651-437-9023. Available at all Tom Thumb stores in Minnesota and Wisconsin.
- Valley View Farms (Milk, Half and half, Whole cream, Buttermilk), Hastings, MN 651-437-9414. Available in Eastern Minnesota and Western Wisconsin.
- Pride of Main Street (Milk, Icecream), Sauk Centre, MN 320-351-8300 Available only in Minnesota.

- Schroder Simply Right (Milk) 651-487-1471, Mapelwood, MN
Schroder also bottles rBGH-free milk for SuperAmerica that is sold only in returnable ½ gallons under the SuperAmerica label. Available in MN and Western Wis.
- Kemp's Select (Milk), Kemp's Marigold Foods, Minneapolis, MN, 800/726-6455. Available in Minnesota and Eau Claire, WI area.
- Land O Lakes' Original (Milk) Arden Hills, MN 651-481-2222
Available nationwide.

New Hampshire

- Hatchland Dairy* (Milk, Chocolate Milk, Egg Nog, Cream), N. Haverhill, NH, 603/787-2388, available in New Hampshire and Vermont.
- McNamara Dairy* (Milk, Chocolate Milk, Eggnog, Cream), West Lebanon, NH, 603/298-6666, available in New Hampshire and Vermont.

New Jersey

- Farmland Dairies (Milk, Chocolate Milk, Cream), Wallington, NJ, 1800/327-9522, available on the east coast.
- Biazzo Dairy Products (Cheese), Riverfield, NJ, 201/941-6800, available nationwide.

New York

- Derle Farms (Milk with "no rBST" label only), Brooklyn, NY, 718/257-2040, available in New York and New Jersey.
- Egg Farm Dairy (Butter, Cheese, Ice Cream, Cream), Peekskill, NY, 800/CREAMERY, available at their local retail store, by mail order, and nationwide at gourmet food stores.

Ohio

- Buckeye Grove Farm Cheese (cheese), Aged farmhouse cheese produced using only Grade A hormone free, unpasteurized Jersey cow milk. Available nationally at www.buckeyegrovefarmcheese.com or in person at 50543 Twp. 141 Beallsville, OH. 43716 740/926/1904.

Pennsylvania

- Erivan Dairy Yogurt*, Oreland, PA, 215/887-2009, available on the East Coast and in the Midwest.

Tennessee

- Cruze Farm Dairy*, (Churned Buttermilk, Un-homogenized Whole milk, Icecream available seasonally), Knoxville, TN, (865) 525-6966, available in Knoxville, Sevierville, and Maryville, TN

Texas

- Promised Land Dairy, (Milk) Floresville, TX, (210) 533-9151, <http://www.promisedlanddairy.com>, available in TX, AR, OK, LA, KS AND MO.

Vermont

- Thomas Dairy (Milk, Cream, Egnog, Chocolate Milk, Butter, Sour Cream, Yogurt, Buttermilk), Rutland, VT, 802/773-6788, available in central Vermont.
- Monument Farms* (Milk, Cottage Cheese, Buttermilk, Cream), Middlebury, VT, 802/545-2119, available in Vermont and at their own store in Weybridge, VT.
- Booth Brothers Dairy (Milk, Cream, Chocolate Milk, Egg Nog), Barre, VT, 802/476-6605, available in Vermont and New Hampshire.
- Orb Weaver Farm* (Cheese), New Haven, VT, 802/877-3755, available in Vermont, by mail order, at the farm, and at Murray's Cheese Shop in New York City.
- Vermont Family Farms* (Milk), Vermont Milk Producers, Whiting, VT, 802/897-2769, available in Vermont, New Hampshire, Massachusetts, and upstate New York.
- Wilcox Dairy (Milk, Ice Cream), Manchester, VT, 800/262-1223, available in Vermont, New Hampshire, Massachusetts, and in upstate New York.
- Blythedale Farm Cheese*, Corinth, VT, 802/439-6575, available in the Northeast.
- Sugarbush Farm* (Cheese), Woodstock, VT, 800/281-1757, available in the Northeast and by mail order.
- Ben & Jerry's Ice Cream, S. Burlington, VT, 802/846-1500, <http://www.benjerry.com/ca/> available nationwide.
- Franklin County Cheese (Bagel Factory Cream Cheese, Shaw's Cream Cheese, Bruegger's Bagels Cream Cheese—eastern US only, All Seasons Kitchen @ @, Lombardi's - Cream Cheese and Mascarpone, Vermont Butter and Cheese - Mascarpone), Enosburg Falls, VT, 802/933-4338, www.franklinfoods.com, available nationwide.
- Crowley Cheese of Vermont, Healdville, VT, 802/259-2210, <http://www.newenglandcheese.com/companies/crowley.html>, available nationwide and by mail order.

- Grafton Village Cheese, Grafton, VT, 800/472-3866, 802/843-2221, <http://www.graftonvillagecheese.com> available nationwide and by mail order.
- Shelburne Farms Farmhouse Cheddar Cheese*, Shelburne, VT, 802/985-8686, available nationwide, by mail order, and at their own farm-site store.

Virginia

- Shenville Creamery, (Entire line of products Yogurt, Ice Cream, Fluid Milk, Fresh Cheeses, Dips) Timberville VA 1-877-600-7440, <http://www.shenville.com/pages/351204/>, Available in Richmond and northern VA at most Kroger stores.

Washington

- Smith Brothers Dairy (Milk), Kent, WA, 206/682-7633 <http://www.smithbrothersfarms.com>, available in Washington

Wisconsin

- Chippewa Valley Cheese, (Cheese), Osseo, WI , 715-597-2366, www.chippewavalleycheese.com, available in WI, MN, ND, AR and by mail order from their website.
 - Family Farms Defenders*, (Cheese), Madison, WI 608-260-0900, available in Madison, WI and nationwide by mail order.
 - Cedar Grove's Family Farmer Cheeses*, Plain, WI, 608/546-5284, <http://www.execpc.com/~cgcheese/> , available in the Upper Midwest, at their own store in Plain, and by mail order (800/200-6020).
 - North Farm Cooperative* (Cheese), Madison, WI, 800/236-5880, 608/241/2667, <http://www.northfarm-coop.com>, available nationwide and by mail order.
 - Salemville Cheese, North Farm Cooperative, Madison, WI, 800/236-5880, nationwide and by mail order.
- Westby Cooperative Creamery* (Cottage Cheese, Sour Cream, French Onion Dip, Butter, Cheese), Westby, WI, 800/492-9282, <http://www.westbycreamery.com>, available in Wisconsin, Minnesota, Iowa, and Illinois and at their own store in Westby; cheese available by mail order.

- **indicates that it comes from a family farm**

February 11, 2003

The Honorable G. Steven Rowe
Attorney General
6 State House Station, 6th Floor
Augusta, ME 04333

Re: Petition to Suspend Use of State of Maine Quality Trademark for Milk and Milk Proteins

Dear General Rowe,

I am writing to you after a discussion I had with Marilyn Anderson from the Maine Coop Voices United. She told me of the attempt by Monsanto to force Maine to allow milk from cattle treated with recombinant bovine growth hormone (rbGH) to be eligible for the Maine "Seal" (currently prohibited by present law) and for the Attorney General to legally prosecute dairies that advertise that their milk comes from farmers that pledge not to use milk from rbGH-treated cattle. Since I testified before the Maine legislature when they were hearing the original mandatory labels bills for milk and other dairy products derived from rbGH-treated cattle, I would like to weigh in on a few issues that are used in Monsanto's Petition. I will argue that: milk from rbGH-treated cattle differs from milk from untreated cattle, unanswered questions exist about certain safety issues associated with milk from rbGH-treated cattle, labeling milk as to use of rbGH does not deceive consumers, and FDA does not require a "contextual statement" on milk labeled as coming from cattle not treated with rbGH. In sum, we support the right of Maine to use its Quality Seal in the way that it presently does (i.e. by requiring that 80% of the milk come from dairies in Maine and that farmers pledge not to use rbGH) and urge you to deny Monsanto's Petition. To grant Monsanto's petition would endorse the idea that consumers do not have a right-to-know whether their milk comes from cows that have not been treated with rbGH (or from farmers who pledge not to use rbGH), which we think would be a bad idea.

I. Milk from rbGH-treated cattle differs from milk derived from untreated control cattle

Monsanto attempts to argue that milk from rbGH-treated cattle "is equivalent in all respects to other milk." We disagree. First, Monsanto's rbGH differs from cattle's natural growth hormone. A cow's natural growth hormone is a protein that consists of 190 or 191 amino acids. Monsanto produced a version of the natural bGH which differed by a single amino acid (methionine), which was added to one end of the molecule (the N-terminus). This difference facilitated the production of rbGH by bacteria, e.g. the yield of rbGH produced per bacteria was higher when the gene coded for an rbGH molecule that ended with a methionine than one that did not. Thus, milk from rbGH-treated cattle will contain rbGH, while milk from untreated cattle will not.

Monsanto's rbGH product, POSILAC, which has an extra amino acid (methionine) at one end of the molecule is also more immunogenic (e.g. stimulates the immune systems more) than natural bGH produced by a cow's pituitary gland, e.g. there are differences in how the immune system reacts to a cow's natural bGH and Monsanto's rbGH. A paper published in 1994 using Monsanto's rbGH product, "Identification of antigenic differences of recombinant and pituitary bovine growth hormone using monoclonal antibodies," demonstrated "that small differences in structure, for example through additional N-terminal amino acids, can markedly change the immunogenic characteristics of a protein" (Erhard et al., 1994: pg. 16).

Thus, rbGH differs from cow's natural bGH in ways that can be detected by the immune system. Further, some of the bGH in cow's milk will consist of rbGH; conversely, rbGH will not occur in the milk of untreated cows. So, the presence of rbGH in the milk of cows treated with rbGH constitutes a difference with the milk from untreated cows.

Second, Monsanto's own studies have shown that milk from rbGH-treated cattle has elevated levels of insulin-like growth factor-1 (IGF-1) compared to milk from untreated cattle. IGF-1 is a protein hormone found in the milk of all mammals. In addition, bovine IGF-1 and human IGF-1 are identical (i.e. they have the exact same amino acid sequence). Prior to gaining approval for POSILAC in the fall of 1993, Monsanto submitted a number of studies to the FDA concerning the effect of rbGH on milk levels of IGF-1. There were four studies mentioned in the FDA's Freedom of Information Act summary of the data used to gain approval for POSILAC; the first three of these studies were also discussed in the 1990 paper in *Science*, "Bovine growth hormone: food safety evaluation," authored by two FDA scientists, Judith Juskevich and Greg Guyer (Juskevich and Guyer, 1990). I briefly discuss all four studies below.

The first Monsanto study (Torkelson et al., 1988) involved 18 cows and an rbST dosage of 500 mg injected every 14 days, with milk collected 7 days after each of 3 injections. The study found that "After each of the 3 doses, mean milk IGF-I in controls was 3.22, 2.62 and 3.78 ng/ml and in treated cows was 3.80, 5.39 and 4.98 ng/ml, respectively. Differences between treated and control groups was [sic] significant after the second and third doses" (FAO, 1993: 121). Thus, the average IGF-I concentrations were increased by 18%, 106% and 31.7% for injection cycles 1, 2, and 3, respectively in the treated groups compared to controls.

The second Monsanto study (White et al., 1989) involved 18 cows and an rbST dosage of 500 mg injected every 14 days, with milk collected 7 days after each of 3 injections. As in the Torkelson et al. study, mean milk IGF-I concentrations were statistically significantly higher after the second and third doses. Mean milk IGF-I in controls was 3.17, 3.34 and 3.35 ng/ml and in treated cows was 3.50, 5.33 and 4.68 ng/ml, respectively. Thus, the average IGF-I concentrations were increased by 10%, 60% and 40% for the first, second and third doses, respectively in the treated group compared to controls.

The third Monsanto study (Miller et al., 1989) involved 64 cows and an rbST dosage of 500 mg injected every 14 days, with milk collected 7 days after each of 10 injections. The study found that "milk concentration of IGF-I was increased across the 10 injection cycles" (FAO, 1993: 126). For primiparous cows (i.e. those giving birth for the first time, aka first calf heifers) the increase was 74%, from 3.5 ng/ml to 6.1 mg/ml for control and rbST-treated cows, respectively. For multiparous cows, the increase was 41%, from 3.9 ng/ml to 5.6 mg/ml for control and rbST-treated cows, respectively. Both results are statistically significant.

The fourth Monsanto study was conducted at the Monsanto Animal Research Center in O'Fallon, Missouri and reported in late 1993 in the US FDA's Freedom of Information Act Summary of the data used to gain approval for POSILAC, Monsanto's rbST product. This study involved 18 cows, an rbST dosage of 500 mg injected every 14 days, with milk collected 7 days after each of three injections. IGF-I levels were statistically significantly elevated in milk from rbST-treated cows. Indeed, the milk IGF-I levels of treated and control cows did not even overlap, i.e. the milk IGF-I level from the 9 rbST-treated cows was higher than any of the levels found in the milk of control cows: "During the study, milk IGF-I concentrations ranged from 3.16 to 3.35 ng/ml for control cows and from 3.49 to 5.31 ng/ml for treated cows. The difference in milk IGF-I between control and treated cows was statistically significant at the 5% probability level" (FDA, 1993: 121).

In sum, all four studies done by Monsanto found statistically significant increases in levels of IGF-1 in milk from rbGH-treated cows compared to milk from untreated cows. The study by Miller et al. (1989) used the largest number of cattle (64) and had the longest duration of experiment (10 injection cycles or 140 days) and found increases in mastitis of 74% and 41% for primiparous and multiparous cows, respectively. According to label directions, POSILAC can be used starting in the 9th week after lactation and can be used to the end of the lactation cycle. Since a normal lactation period is ten months, this means using about 20 injection cycles. So, Monsanto's own data show that there is a significant increase in IGF-1 levels in milk from rbGH-treated cows compared to milk from untreated cows.

II. Unanswered questions do exist about certain safety issues associated with milk from rbGH-treated cattle

Contrary to Monsanto's and FDA's assertion, there are still certain safety issues associated with milk from rbGH-treated cattle that have still not been fully resolved. The primary unanswered safety question revolves around IGF-1.

The issue of IGF-1 and its potential human health impact was raised by both the National Institutes of Health (NIH) and the American Medical Association (AMA) in the early 1990s just after the paper, "Bovine growth hormone: food safety evaluation," written by FDA scientists and published in *Science* demonstrated that milk from rbGH-treated cows had statistically significantly higher levels of IGF-I compared to milk from untreated cows. The NIH held a Technical Assessment Conference on BST in December 1990. In a statement issued by the NIH Health Expert Committee after the Conference, they stated "Whether the additional amount of insulin-like growth factor 1 in milk from [rbGH-treated] cows has a local effect on the esophagus stomach or intestines is unknown" (NIH, 1991). One of the six recommendations for further research in the report was "Determine the acute and chronic actions of IGF-I, if any, in the upper gastrointestinal tract".

Three months after the NIH conference, in March 1991, the Council on Scientific Affairs on the AMA published a paper in the *Journal of the American Medical Association* entitled "Biotechnology and the American Agriculture Industry." The section that talked about human health impacts of rbGH use stated, "Further studies will be required to determine whether ingestion of higher than normal concentrations of bovine insulin like growth factor is safe for children, adolescents, and adults" (AMA, 1991: 1433).

These warnings of the need for more research on the potential safety implications of IGF-I were very prescient, as discussed below. At the time of these warnings, it was known that, besides its effect on human metabolism, IGF-I had been associated with the growth of numerous tumors, including colon (Tricoli et al., 1986), smooth muscle (Hoppener et al., 1988), breast (Rosen et al., 1991), and others (Pavelic et al., 1986). A basic question that was not known at the time, however, was whether IGF-I in milk could survive digestion; that's in large part why both the NIH and the AMA called for further research.

The US FDA has maintained that IGF-1 does not survive digestion. Furthermore, FDA argues that even if IGF-1 does survive digestion, the levels in cow's milk (from 1-13 ng/ml) are so low compared to levels in human sera (about 100-200 ng/ml), that there would be no effect on the total serum levels of IGF-1 so there would be no adverse health effect.

We believe the FDA is wrong on both accounts. First, a couple of studies done in the mid-1990s suggest that IGF-I may survive digestion. A rat study, published in 1995, found that IGF-I, in the presence of casein (the major milk protein), easily survived digestion in the stomach, enabling it to pass into the small and large intestine (Xian, et al., 1995). The presence of casein also had some protective effect in the duodenum and dramatically increased the half-life of IGF-I in the intestine. The authors concluded that using casein may make it possible to give therapeutic oral doses of IGF-I: "It can be concluded that IGF-I cannot be expected to retain bioactivity if delivered orally because of rapid proteolysis in the upper gut, but the use of IGF antibodies and casein could represent useful approaches for IGF-I protection in oral formulae" (Xian et al., 1995: 215). Another rat study done in 1997 clearly demonstrated significant gastrointestinal absorption of recombinant human IGF-I (rhIGF-I) (remember that human IGF-1 and bovine IGF-1 are identical). After oral administration of rhIGF-I at the dose of 1.0 mg/kg body weight (half the dosage that FDA found to be completely digested and not orally active), the study "found that a considerable amount of rhIGF-I was absorbed into the systemic circulation and that the bioavailability was 9.3%. . . . The coadministration of aprotinin and that of casein enhanced the bioavailability further: 46.9% and 67.0%, respectively" (Kimura et al., 1997: 611). Since determination of the blood levels of a protein can be a bit tricky (various methods have their advantages and drawbacks), the authors used three analytical methods. All three methods clearly showed that both casein

and aprotinin lead to statistically significant increases in absorption of IGF-I. The authors concluded that "[t]hese results strongly support the feasibility of the p.o. [peri oral] administration of rhIGF-I" for therapeutic purposes in humans (Kimura et al., 1997: 618). This paper clearly showed that IGF-1 can survive digestion when in the presence of casein, the major protein in milk.

Second, and more important, a series of papers published in the late 1990s and as late as 2002 have found higher levels of serum IGF-1 to be associated with increased risk of a number of cancers, especially prostate (Chan et al., 1998a; Harman et al., 2000), colon (Ma et al., 1999; Giovannucci et al., 2000), lung (Yu et al., 1999) and premenopausal breast cancer (Toniolo et al., 2000). Indeed, a paper ("Role of the insulin-like growth factor family in cancer development and progression") published in the *Journal of the National Cancer Institute* in 2000 laid out a biological mechanism to explain the link between IGF-1 and cancer (Yu and Rohan, 2000).

As for the argument that levels of IGF-1 in milk are too low to alter concentrations of IGF-1 in human serum and so there could be no health effect of the increased levels of IGF-1 in milk from rbGH-treated cattle, a paper published just last fall shows this argument may be incorrect as well. A team of scientists at Brigham and Women's Hospital and Harvard Medical School in Boston used data from a large, long-term (25 years) study of more than 1,000 nurses who record their diets carefully and who were then watched for changes in health. The study found that higher serum levels of IGF-I were found in the women who consumed the most dairy products and noted that other studies had found a link between increased dairy intake and increased serum IGF-I levels. As the study noted: "Our most consistent dietary finding was the positive association of IGF-I levels with total dairy and milk intake. . . Two other studies have supported an effect of milk intake on IGF-I levels. A randomized trial of 204 men and women where the intervention was to encourage consumption of three servings/day of nonfat milk to affect bone remodeling found that the 101 subjects in the intervention group had a statistically significant 10% average increase in serum IGF-I levels, whereas the control group had no change in levels (Heaney et al., 1999). In addition, Ma *et al.* (2001) observed a positive association between intake of dairy food and IGF-I levels among 318 men enrolled in the Physicians' Health Study. . . . *These results raise the possibility that milk consumption could influence cancer risk by a mechanism involving IGF-I.* In fact, positive associations between milk intake and risk of prostate cancer have been reported (Chan et al., 1998b; Talamini et al., 1986; Tzonou et al., 1999; La Vecchia et al., 1991; Talamini et al., 1992; and Schuurman et al., 1999). In the NHS, one or more servings of milk/day was associated with a higher risk of serous (sic) ovarian cancer (relative risk, 1.66; 95% confidence interval, 1.10 - 2.51) compared with three or fewer servings/month (Fairfield et al., 2000)" italic added (Holmes et al., 2002: pp. 859-860). A copy of this paper is appended to this letter.

A Reuters new story about this new study (copy attached), issued on September 10, 2002, quoted the lead author on the study, Dr. Michelle Holmes, discussing how this research suggests that IGF-I can be associated with various cancers: "Pregnancy may lower a woman's risk of cancer but drinking milk could raise it, researchers reported on Tuesday. . . . This is the first study to report that the more pregnancies a woman had, the lower was her blood level of IGF-1, Holmes said. 'Pregnancy is known to protect against several cancers such as breast and colon cancer. It is possible that the mechanism of this protection could be through lowering IGF-1 levels.' . . . 'We concluded that greater milk consumption was associated with higher levels of IGF-1,' said Holmes. *'This association raises the possibility that diet could increase cancer risk by increasing levels of IGF-1 in the blood stream. However, more research must be done to determine whether milk consumption itself is directly linked to cancer risk'* " italics added (Reuters, 2002).

All this new research on IGF-I published in the late 1990s and early 2000s—its connection with various cancers, its ability to potentially survive digestion when in milk, and the connection between increased milk consumption and increased sera levels of IGF-I—clearly show that there are still unanswered health questions associated with the consumption of milk from rbGH-treated cows. Clearly, more research into this area needs to be done to answer the questions raised by the new research described above.

III. Labeling milk as to use of rbGH does not deceive consumers

In their Petition, Monsanto tries to argue that any mention in an advertisement as to whether milk comes from non-rbGH-treated cattle “deceives consumers.” We strongly disagree with these assertions. We note that the advertisements from Oakhurst Dairy and from H.P. Hood that Monsanto refers to clearly state that the farmers pledge not to use rbGH; the ads do not claim that their farmers absolutely don’t use rbGH. Such a claim is truthful because all the farmers do sign affidavits that they do not use rbGH on their cattle.

Monsanto also argues that the ads “mislead consumers by creating the false impression that milk is somehow better if it is produced without the use of rBST. Indeed, these claims falsely suggest that there are health or safety risks associated with milk from rBST-supplemented cows.” We do not necessarily believe that a truthful label—such as “from farms that pledge not to use artificial growth hormone” or “Our Farmers’ Pledge: No Artificial Growth Hormones”—always leads to the conclusion that milk from cows not treated with artificial growth hormones is “safer or superior to non-supplemented milk.” While some consumers may draw such a conclusion from these ads, others may not. Indeed, if such labels are considered to mislead consumers, then, by the same logic, labels such as “contains no artificial flavoring or colorings” or “contains no preservatives” would also be considered to mislead consumers. Yet no one has suggested that such labels should be banned.

Finally, we are concerned with Monsanto’s “request that the Attorney General initiate law enforcement proceedings to challenge deceptive claims in the marketplace.” Such legal proceedings against truthful claims would only serve to chill commercial free speech in this area and would make it virtually impossible for dairy chains to label or advertise milk as to whether it comes from farmers who have pledged not to use rbGH on their cows. The end result would be that consumers may be denied a choice about whether the milk they drink comes from cows that have been treated with rbGH or not. We strongly support a consumers right-to-choose in this area and so ask that you not initiate any legal proceeding against Oakhurst Dairy and H.P. Hood.

IV. FDA does not require a “contextual statement” on milk labeled as coming from cattle not treated with rbGH

In their Petition, Monsanto suggests that a “qualifying statement,” such as suggested FDA wording “No significant difference has been shown between milk derived from rbST-treated and non-rbST treated cows,” would be needed “to qualify the misleading claims conveyed by the quality Seal or the labels and advertisements.” We strongly disagree with the notion that such “qualifying statements” are needed or required. First, we note that the suggested FDA language is misleading, because differences between milk from rbST-treated and non-rbST treated cows—particularly the statistically significant increases in IGF-I and the presence of rbGH—have been found. Second, the FDA has clearly stated that such a qualifying or “contextual” statement is not required at all. A letter written to Harold Rudnick (Director of the Division of Milk Control in the State of New York Department of Agriculture and Markets) by Jerry Mande (Executive Assistant to then FDA Commissioner David Kessler) and dated July 27, 1994, clearly shows this: “as I indicated, the bottom line is that a contextual statement is not required, that in many instances a statement like ‘from cows not treated with rbST’ would not be misleading and in no instance is the specific statement ‘No significant difference. . .’ required by FDA. . . the intent of our guidance was to have a uniform voluntary rbST labeling regime among states, that states were not necessarily pre-empted from developing alternative programs. For example, a state that has right-to-know would not be pre-empted by FDA from requiring rbST labeling even though FDA has determined it lacks the basis for requiring such labeling in its statute” (Mande, 1994: 2) (a copy of the letter is included as an attachment to this letter).

In sum, FDA has clearly stated that a “contextual statement” is not required milk labeled as coming from cows not treated with rbGH. In fact, I would argue that Maine’s Quality Seal program would constitute such an “alternative program” as discussed in the FDA letter above and so would be

perfectly legal. Finally, it should be noted that the Quality Seal program is a voluntary and not a mandatory label.

In conclusion, for all the reasons discussed above, we urge you to deny Monsanto's Petition.

Sincerely,

Michael Hansen, Ph.D.
Senior Research Associate
Consumer Policy Institute/Consumers Union

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