



The Facts About Milk Labels

Consumers' Right To Know is Improved When Information is Accurate and Complete!

Should marketers have the right to brand milk as antibiotic-free, hormone-free, rbST-free or pesticide-free? First, consider the following:

- Both the US Food and Drug Administration (FDA) and state laws (food codes) govern how food should (or shouldn't) be labeled. Typically, provisions state:
 - "Food is misbranded ... if: its labeling is false or misleading in any particulars"
 - ... labeling is misleading if it fails to reveal facts that are material in light of representations made or suggested in the labeling,

Keeping these laws and rules in mind, take into consideration some facts about milk, antibiotics, pesticides and hormones.

- All milk is tested multiple times for antibiotics, and the milk is discarded if antibiotics are found. Milk with violative residues **does not** get sold.
- The FDA has surveyed samples of milk, dairy products and eggs for pesticides and has **not found** residues in amounts over tolerance levels.
- The hormone levels in milk from rbST supplemented cows, milk from non-supplemented cows and milk from cows raised in the organic production system are ALL **exactly** the same.
- The bST levels are very low in **all** milk - undetectable in many situations. Somatotropin levels in all milk are less than 1 part per billion. That is equivalent to 1 drop in 35,000 gallons.

Do consumers find labels that promote milk as being hormone-free, etc. misleading and could these labels make consumers think some milk is safer than others?

- Of course!! Consumers are confused by such labels if they do not have all the facts. Milk marketers use these claims to differentiate their milk and charge more for it. They point to consumer demand when, in fact, research shows consumers make milk purchases based upon price, fat content and expiration date.



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- The American Farm Bureau Federation does quarterly marketbasket surveys that show milk labeled 'rbST-free' has been selling from 25% to 38% more than regular milk.

Farm Bureau *Marketbasket Survey* Half Gallon Containers – Whole Milk

Quarter	2Q07	Cost, in % Over Regular Milk	3Q07	Cost, in % Over Regular Milk	4Q07	Cost, in % Over Regular Milk	1Q08	Cost, in % Over Regular Milk
Regular	\$2.22	-	\$2.40	-	\$2.38	-	\$2.40	-
rbST Free	\$3.01	36%	\$3.01	25%	\$3.06	29%	\$3.30	38%
Organic	\$3.65	64%	\$3.43	43%	\$3.47	46%	\$3.63	51%

- Higher priced dairy products will force some people to purchase other less healthy beverages. Dairy products are one of the essential foods in the government's food pyramid; people need to consume them. Further, if all milk is labeled consumers are deprived of choice.
- The U.S. government spends over \$14 billion on dairy purchases to support The Special Supplemental Nutrition Program for Women, Infants and Children (WIC), school breakfast and lunch programs, and the food stamp program. Higher priced milk means less dairy products for those that can least afford it.

Should marketers have the right to brand milk as antibiotic-free, hormone-free, rbST-free or pesticide-free?

- If labels clearly state that the claims represent different dairy management practices, if there is a verification system in place to ensure accuracy, and if the label also clearly states there are no differences in the milk, then and only then it is appropriate.

Reference – Hammond, B. G., The food safety assessment of bovine somatotropin (bST), in *Food Safety of Proteins In Agricultural Biotechnology*, Hammond, B. G., Ed., CRC Press, New York, NY, 2008, pp. 167-208.

- American Farm Bureau *marketbasket survey*, www.fb.com

- <http://www.fda.gov/opacom/laws/fdcaact/fdcaact4.htm>;

- <http://www.nationaldairycouncil.org/NationalDairyCouncil/Nutrition/Products/milkPage5.htm>



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