



ANIMAL
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May 12, 2000

FDA Dockets Management Branch(HFA-305)
5630 Fishers Lane
Rockville, MD 20852

7196 '00 MAY 18 AIO '52

Re: Support For Petition To Ban Use Of BGH On Dairy Cows -Docket #99P-4613

To Whom It May Concern:

On behalf of the Animal Protection Institute (API), a national non-profit animal advocacy organization with over 85,000 members and supporters nationwide, I am pleased to respond to the Food and Drug Administration's receipt of a petition to prohibit the use of genetically engineered Bovine Growth Hormone on dairy cows.

Genetically engineered Bovine Growth Hormone (BGH) is injected into dairy cows to increase milk production by as much as 25%. The use of this hormone not only poses serious animal and human health risks, but also economic consequences.

It has been well documented that BGH treated cows are more likely to develop mastitis, an infection of the udder, which requires treatment of antibiotics which ultimately end up in the milk. Also, BGH has been linked to animal reproductive problems, including infertility, cystic ovaries, and fetal loss.

In addition, BGH treated cows produce milk containing elevated levels of a hormone commonly referred to as Insulin-like Growth Factor 1 (IGF-1). Although IGF-1 is a naturally occurring hormone in humans, the ingestion of BGH milk increases the level of IGF-1 in the body, which increases one's risk of developing cancer. In fact, a 1998 Harvard study discovered that men with elevated levels of IGF-1 in the blood are 4 times as likely as the average man to develop prostate cancer.

Moreover, the use of BGH drives milk prices down. This causes a decline in the family dairy farmers' income and places them at an economic disadvantage. Furthermore, both Canada and the European Union have banned BGH because of potential human and animal health risks associated with the hormone.

For all the reasons set forth above, I respectfully request the FDA to approve the above referenced petition and thus protect the health and well-being of not only the dairy cows, but also the American public.

API reserves the right to supplement these comments should any new information become available before the FDA issues its final decision. Thank you for this opportunity to comment.

Sincerely,

Nicole G. Paquette, J.D.
Government Affairs Coordinator

99P 4613

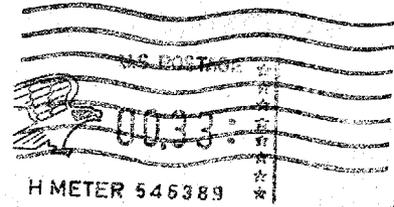
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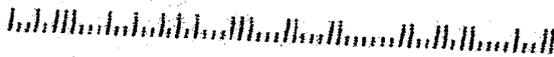
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