

EXECUTIVE SUMMARY

David Lynch, as owner and operator of Guidestone Farm, and the owners of cow shares in the herd boarded at the dairy, are submitting the accompanying materials for the purpose of requesting the Board of Health:

1. Not to adopt the proposed regulation to ban cow-share programs in Colorado because of lack of jurisdiction (the present position); and
2. To adopt a regulatory system for cow-share programs (TAB C), and/or
3. To remove unreasonable restrictions from the proposed exemption for Guidestone Farm (TAB D).

Guidestone Farm's position is based on the following points:

- There are significant reasons “why raw milk” should be permitted to informed consumers, where the dairy operations meet the equivalent of Grade A Dairy standards (TAB E).
- The cow-share program represents a contractual relationship between the consumer and the farmer and is a closed loop system that prohibits raw milk from being sold off the shelf. In accordance with the legal documents, the raw milk must be distributed directly to the consumer from the farm and is prohibited from being sold off the shelf. Thus, there is no direct competition with any other milk products sold through the retail system.
- Illness has been wrongly attributed to raw milk. The Wisconsin situation is an example. TAB F.
- A majority of states permit raw milk to be available to consumers in some fashion (TAB G).
- The quality of Guidestone Farm milk is far better than required standards in the industry (TAB H).
- Doctors prescribe raw milk for their patients. Examples are at TAB I. There are many other health practitioners who recommend the consumption of raw milk products. Their patients should not be denied access to a product their physicians prescribe.
- The proposed regulation raises a number of legal considerations, which have not been fully and thoroughly addressed (TAB J). The Division has failed to study and provide an appropriate balance among all the issues and principles, which should be considered. The issues are complex and need study beyond simply a “say no” position on raw milk (TAB K).
- Many, many people desire to have access to raw milk. For example, a portion, but only a portion, of the signatures that have been gathered on petitions, is included at Tab L. Desires of consumers should be given strong attention.
- There is substantial evidence supporting the health benefits of raw milk studies performed by medical researchers, biologists, chemists and nutritionists among others. Examples are contained at TABS M through X.