



To: Advertising Standards Authority for Ireland From: Stephen Balfour,
PETA

9 November 2017

Dear Sir/Madam,

I'm writing to make a complaint against the National Dairy Council's "Irish Dairy – the Complete Natural" campaign, as it contains several apparent breaches of the Advertising Standards Authority for Ireland (ASAI) Code of Standards for Advertising and Marketing Communications in Ireland. The adverts used in the campaign appear to have been designed deliberately to mislead consumers by presenting cows' milk as "plant-based", a term widely accepted to mean "made from plants", as in the case of milks made from almonds, soya, or rice.

One [advert](#) (attached) depicts a woman drinking a glass of cows' milk, alongside the tagline "Looking for a completely natural, plant-based milk? Open your fridge." The "Irish Dairy – the Complete Natural" logo also appears quite prominently, and the words "Irish cows are fed outdoors on a diet of fresh, green grass" appear in a far smaller text size. We request that this advert be withdrawn, as it contravenes the following ASAI standards:

4.1 A marketing communication should not mislead, or be likely to mislead, by inaccuracy, ambiguity, exaggeration, omission or otherwise.

Milk squeezed out of a cow is no more plant-based than is flesh cut from her body. Dairy milk is taken directly from an *animal*, whereas plant-based milks are made directly from *plants*. It is wrong for the National Dairy Council to attempt to capitalise on the booming popularity of plant-based milks with this misleading and false claim.

4.6 Disclaimers, asterisked, footnoted or "small print" information should not contradict more prominent aspects of the message. Such information should be of sufficient size and/or prominence and be located and presented in such a manner as to be clearly and easily legible and/or audible; where appropriate such information should be linked to the relevant part of the main copy.

The advert's prominent text and logo imply that Irish cows' milk is a plant-based product. The text "Irish cows are fed outdoors on a diet of fresh, green grass" appears to justify the assertion, but it is printed in a far smaller size – and is misleading, in any case.

4.7 Whether the presentation of information is insufficient or likely to mislead depends on the context, the medium and, if the medium of the marketing communication is constrained by time or space, the measures that the advertiser takes to make that information available to the consumer by other reasonably accessible means.

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Part of this campaign involves billboard advertising, including an [advert](#) on the corner of Sheriff Street and Guild Street in Dublin. Because of the billboard's elevated position and the small size of the text, the explanatory (but still misleading) statement that "Irish cows are fed outdoors on a diet of fresh green, grass" runs the risk of being missed by passers-by, who may only see the main, inaccurate message that Irish cows' milk is "plant-based".

We also believe that other parts of the "Irish Dairy – the Complete Natural" campaign are in violation of the following standards:

4.1 A marketing communication should not mislead, or be likely to mislead, by inaccuracy, ambiguity, exaggeration, omission or otherwise. We believe the "[Milk Is Milk. Or Is It?](#)" section of the campaign website contains inaccurate and deliberately misleading information. It claims that dairy milk contains no added sugar and that plant-based milks do. However, some dairy milks (such as Mooju Chocolate Milk) do contain added sugar and some plant-based milks do not – for example, Alpro's Rice Original and Soya Unsweetened. This claim could lead consumers to believe that all plant-based milks have added sugar and is therefore misleading.

8.5 Marketing communications for food should not show people who choose a healthy active lifestyle in a negative manner.

Problematic language is used throughout the campaign [website](#) and in this associated [video](#). The material ridicules consumers who choose to buy non-dairy products and implies that those people are "fakesters" (inauthentic) and/or following a fad diet. Many people choose to avoid cows' milk to benefit their health – including those with a milk allergy or intolerance and those who understand that it is nutritionally appropriate for calves but not for humans.

8.6 Marketing communications for food should not disparage good dietary practice or the selection of options that accepted dietary opinion recommends should form part of the average diet.

Plant-based drinks are chosen by an increasing number of consumers, and it is widely accepted that these can form part of a healthy diet – most are fortified with vitamins, and many are lower in fat than similar dairy products are. According to your Code of Standards, the National Dairy Council should not disparage other options that are available to consumers.

We urge the ASAI to take immediate action in response to these apparent breaches of your Code of Standards. Given the high-profile nature of this campaign, we would also expect the National Dairy Council to receive an appropriate penalty.

I look forward to receiving details of your decisions.

Yours sincerely,



Stephen Balfour | Vegan Corporate Projects Liaison

People for the Ethical Treatment of Animals

PETA.org.uk