

18/05/2017

By Email: elisabthe@asa.org.uk

Dear Elisabeth,

Ref: A17-381845/EE/ts: Go Vegan World ad, Sunday Telegraph in February 2017

I write in response to your letter of 9 May 2017 in which you have advised that the ASA has received seven complaints, some from people involved in the dairy industry, related to the newspaper ad for Go Vegan World ("GVW") in the Sunday Telegraph in February 2017.

I take this opportunity to respond to the complaints, as set out below.

The Ad

I believe it is important to firstly put the ad into context. The aim of the ad is not to attack or undermine dairy farmers. It is rather to share information about the standard practices that are inherent in the dairy industry, which many people are unaware of. The ad, like all the GVW ads, provides the viewer with a link to our web site, where you can clearly see that we do not have the aim of attacking any industry, but instead seek to encourage individuals to change their behaviour so as to avoid exploiting and killing other animals. We offer to work with farmers to assist them to move away from the use of animals to growing food (<https://goveganworld.com/living-vegan/farming/>).

The aim of the ad is to let people know that no matter where the milk and dairy they purchase has come from, whether an industrial-scale dairy farm or a small holding, there are practices that are inherent in our exploitation of cows that render the entire practice inhumane.

The ad shows a picture of cow behind barbed wire, which depicts the reality for all cows brought into existence by us in order that we can use them for their milk; they are under our control entirely and are kept in captivity in order that we can exploit them and then kill them. ("Farm animals cannot escape their living conditions" (Sundrum et al, 2015) ⁱ).

1. Humane

The headline text states "Humane milk is a myth. Don't buy it". The aim of the ad is to educate people about why milk always involves inhumane practices and to encourage them to avoid participating in this exploitation and killing by going vegan. It does not seek to attack dairy farmers.

The smaller text describes one individual's experience of visiting a dairy farm. They describe what they saw and why they decided they could no longer support the practice.

You have advised that the complainants took issue with the use of the word "humane". They have challenged whether the claim "humane milk is a myth" is misleading and can be substantiated, and they have raised concerns that viewers will understand "humane" as referring to whether the treatment of dairy cows complies with UK regulation on animal welfare. Indeed they believe that the claim "humane milk is a myth" implies that there are widespread breaches of those regulations within the dairy industry.

In fact the ad seeks to do something quite distinct from what has been asserted by the complainants. It is not related to our welfare regulations. Instead the ad lets people know that the standard practices

that are inherent in dairy are inhumane, which is the case regardless of our welfare rules. The only people who have referred to welfare regulations are farmers and/or the organisations that represent them. Go Vegan World has publicly corrected this view on several occasions.

“Following an open letter from Mr Oakes to the newspaper, GVW hit out at the union and said it was ‘entirely missing the point’ of veganism. GVW campaign director Sandra Higgins said: “Veganism is about justice. Justice can’t be accorded to others unless we are willing to swap places with them. “None of us would voluntarily choose the life and death of any mammal used in the dairy industry or any other form of animal agriculture or animal use. The only way to be fair is to abolish all use of them.” She said farmers had ‘no need’ to feel threatened by veganism. “We will need and value farmers more than ever in a vegan world.”“

(<https://www.fginsight.com/news/high-profile-vegan-adverts-cause-industry-anger-19128>)

Our welfare regulations do not make use of the term “humane”. Instead they set out in detail the ways in which animals can be bred, used and killed. Under these laws someone can be prosecuted for causing “unnecessary suffering” to an animal used by us, but that “unnecessary suffering” does not include the standard practices, including killing, that are inherent in the industry.

The perception of most people is that cows and other mammals used for dairy automatically produce milk. They assume that farmers do them a favour by relieving them of that milk. Most people are not aware that in order to lactate, a cow (like all mammals), must first be impregnated, carry a calf for nine months, and then give birth. In order for us to drink the milk the cow produces for that calf, it is standard practice for male and female calves to be removed from their mothers. If male the calves are reared apart from their mothers for their flesh and killed at an early age (some of them are killed at birth)ⁱⁱ and if female they will be used in the same way as their mothers, repeatedly impregnated, their calves removed from them and their milk taken in order that we can drink it. After a few years the cow’s milk production reduces and she will also be killed. All of that is standard practice in the dairy industryⁱⁱⁱ. All mammals have a strong bond with their offspring and separation of this bond results in severe psychological distress for both. These standard practices that are inherent in dairy production render the production of milk inhumane, hence the assertion in the ad that “humane milk is a myth”. It is a public right to know about these practices so that people can make an informed choice about how they live.

The ad does not attempt to address every aspect of the life of mammals in the dairy industry. Most people are also unaware that the animals used in the dairy industry are artificially inseminated, a practice that many would find objectionable. Neither are most people aware that they are selectively bred to maximise the production of milk. Selective breeding and the stress of continual lactation and pregnancy result in stress for all animals used in the dairy industry. A plethora of research papers on the metabolic stress that results from their use in the production of dairy further supports the statement that the production of milk is not humane. They have to contend with annual pregnancy, almost year-long lactation, and lactation during several months of their pregnancy. This results in enormous physiological stress attributable to the human demand for their milk.

“However, increases in milk production have, to an extent, been at the expense of the health and well-being of cows, corresponding with an increase in production and metabolic diseases, decreases in fertility and culminating in the culling of cows at a younger age. The cause of some of these detrimental effects are attributed to a syndrome referred to as metabolic stress, which is considered to be prevalent in modern, high-yielding dairy cows.”

Alison O’Hanlon, Assessment of Metabolic Stress in Dairy Cows, UCD Vet College.^{iv}

The ad provides information so that viewers are informed of some of the inherent practices involved in the use of animals in the dairy industry. It asks viewers to consider how the use of a sentient being in

this way can ever be considered humane when legal, standard practice necessitates her pregnancy, the removal of her calf, and her slaughter, so that we can drink the milk that she produced to feed them.

Humane has been defined as: “Having or showing compassion or benevolence,” or as demonstrating “kindness, care and sympathy”. The word is used in the context of the GVW ad to challenge the myth that using other mammals for dairy can ever be humane, just, compassionate or benevolent; even when the best welfare regulations are adhered to, it is not humane to use any mammal for dairy production.

The major world dietetics associations all agree that dairy is not an essential component of the human diet. We take their milk for reasons of profit, taste and habit (Melina et al, 2016) ^v. We do so at a cost to every mammal who is used by the industry, not least through their deaths in slaughterhouses.

The ad does not suggest that farmers breach legislation and all supplementary material such as the website, the associated vegan guide, and all press releases and public comments made with respect to this ad, focus on challenging the acceptability of animal use rather than on breaches of welfare legislation. Had the ad aimed to demonstrate animal cruelty through breaches of legislation it would have used different language, and it would have had a completely different theme, incompatible with the aim of this ad.

2. “The mothers, still bloody from birth” and “their daughters, fresh from their mothers’ wombs but separated from them”

You have advised that several of the complainants raised specific concerns over the claims: “The mothers, still bloody from birth” and “their daughters, fresh from their mothers’ wombs but separated from them”, which they believe imply that it is standard practice in the UK to separate calves from their mothers immediately after birth.

You have referred to DEFRA’s code of recommendations for the welfare of cattle which states: “Ideally calves should be left with their dam for at least 12 and preferably 24 hours after birth” and “Removing the calf earlier than 12-24 hours after birth should only be done for disease control purposes, under the advice of a veterinary surgeon”.

You have asked that we explain how we think viewers will understand the claims made in the ad, and provide any evidence that calves are not commonly kept with their mothers for 24 hours after birth.

Firstly, we make no claim in the ad that calves are removed from their mothers within any particular time-frame. Specifically, we have not asserted that the calf was removed less than 12-24 hours after birth. We have described the scene that was witnessed by the individual who visited a dairy farm. What they saw was mothers still bloody from birth and young animals fresh from their mother’s womb. A mammal who has given birth within the previous 24 hours is still bloody from birth, while their offspring at only 12-24 hours old are still fresh from their mothers’ wombs. They are defenceless, helpless and they require the presence of their mothers for their psychological security and development. If any other mammal (e.g. puppy, kitten, monkey or human) were taken from his or her mother within the first 12 to 24 hours we would have no difficulty with the description “fresh from their mother’s womb”, and we would find it completely unacceptable.

In their natural state, cows isolate themselves to give birth and they hide their calves for the first ten days. Their calves continue to suckle often beyond the first year of life, until natural weaning takes place.^{vi}

Few, if any, animals would choose to be separated from their babies and the maternal attachment bond would lead them to do everything they could to stay with their offspring. This is why they display signs of stress such as calling following the removal of their calves. In fact, reports from within the veterinary industry corroborate the lengths to which animals used in the dairy industry can go to protect their offspring from us. <https://www.youtube.com/watch?v=q-031z5U5hw&feature=youtu.be&t=5m26s>

Studies on the effects on other animals of our use of them are constrained because they are usually undertaken within a welfarist framework of their economic value rather than a rights based framework concerned with their right to be free of harm. However, for their value in substantiating the claims made in the ads, I have included them here.

Separation of cows and their calves prevents them from having a mutually beneficial relationship. Studies of the rare calves reared by their own mothers demonstrate they are free to suckle as much and as often as they wish, and that this results in better physical health in the calves (Johnsen, 2016).^{vii}

Studies on the separation of cows and calves support the observation made in the ad of the distress caused to both (Marchant Forde, 2002) causing them to “react with loud vocalization, and this is also distressing for their human caretakers.”^{viii}

Farmers are routinely warned to be vigilant when working with newly calved cows, particularly when removing calves from their mothers. Cows who have just given birth present one of the most serious risks to the health and safety of farmers precisely because the mother child bond is so great that cows will do anything they can to protect their children.

“Never stand between a cow and her newborn calf”.
(<https://www.vettimes.co.uk/news/farmers-urged-to-be-alert-to-danger-of-newly-calved-cows/>,

According to figures from the Health and Safety Executive (HSE), 74 people have been killed by cows in the past 15 years. 70% of these deaths involved either a bull or newly calved cow. (<http://www.independent.co.uk/news/uk/home-news/cows-officially-the-most-deadly-large-animals-in-britain-a6727266.html>)

Studies show that the bond between mammals and their offspring used by the dairy industry occurs very quickly after birth and that separation, even at 12 to 24 hours, causes psychological distress to calves and their mothers (Weary et al, (2002)^x ; Marchant-Forde et al 2002). The effects are not restricted to the short term-observable behaviours: they have long term consequences for their future ability to cope with stress and their ability to socialise^x (Wagner et al, 2015). This is comparable to the effects of maternal deprivation in humans. The ad makes no suggestion that there is widespread breach of the DEFRA recommendations. The distress caused by separation is the case whether or not the DEFRA recommendations are followed. In fact, separation after 24 hours may cause even more distress as the bond between mother and child grows within this critical period (Weary et al, 2000). That is the whole point of the ad.

The practice of separation is standard in almost all dairy farms, so that we can use the milk that the mothers produce to feed their young, despite the fact that we have no nutritional requirement for that milk (see for example: American Academy of Nutrition & Dietetics Position Statement on Vegan and Vegetarian Diets, 2016.)

Moreover, the UK imports dairy products from other countries, one of which is Ireland. In Ireland it is acceptable, standard practice to remove calves from their mothers immediately after birth (Lorenz 2013):

“the dairy calf should be removed from the cow immediately after birth (the cow can be allowed to lick the calf).”^{xi}

The practice of separation is not used with suckler cows (cows bred and killed for their flesh), because it is not in the interests of the business that they be separated from their mothers. Although the practice of separating cow and calf is defended in relation to the dairy industry by reference to the physical health of the calf, suckler cows stay with their calves and studies on cows and calves who were left in proximity to each other do not indicate that this is sufficient justification for separation (Johnsen, 2013). They are separated for economic reasons. Whether they are removed immediately or sometime after birth, they and their mothers suffer unnecessarily for a product that humans do not need.

You ask for an explanation of how we think viewers will understand the claims made in the ads. Viewers express surprise and shock when they learn that, contrary to the myth that cows just produce milk, in order for us to consume dairy products, they must first be inseminated, go through pregnancy and childbirth, and then cope with the psychological effects of having their calves removed from them. It is our intention that viewers will grasp the injustice of using other animals in this way and cease their participation in it. Feedback from the campaign has reflected that this is how viewers have interpreted the ad. They understand that it is a rights based ad that questions the acceptability of the standard, legal farming practices upon which the dairy industry is predicated; not a welfare based ad that addresses breaches in legislation or suggests that there is anything that can be done within the system of animal use or the dairy industry to improve the methods by which we violate the right of individuals of other species not to be used in this way. The ad does not suggest that consumers should support better welfare systems. It provides information on animal use and links to information on veganism so that viewers have the information necessary to decide for themselves whether or not to continue participating in the use of animals for dairy production.

You have requested the following additional information:

- Company legal name and address: Go Vegan World, Eden Farmed Animal Sanctuary Ireland, Chamberstown House, Slane, Co Meath, Ireland
- Plans for future use of our advertising: we have no current media schedule as we have no fixed bookings with the exception of a booking for the England v Argentina rugby match on 17 June 2017.
- An electronic copy of the advertising: attached.
- The name of our advertising agency or any other company that prepared the advertising on our behalf: Media Agency, Digital World Centre, 1 Lowry Plaza, Manchester M50 3UB, United Kingdom

I look forward to hearing from you confirming receipt of this letter and the enclosures, and I would be happy to provide additional information or answer any follow up queries the ASA may have.

Yours sincerely,

Sandra Higgins BSc (Hons) Psych, MSc Couns Psych, MBPsS
Campaign Director
Go Vegan World

ⁱ Sundrum et al, (2015) *Metabolic Disorders in the Transition Period Indicate that the Dairy Cows' Ability to Adapt is Overstressed*, *Animals* (Basel). 2015 Dec; 5(4): 978–1020.)

ⁱⁱ “Where no other viable options exist, very regrettably, farmers have no choice but to cull their bull calves.”
<http://www.thisisdairyfarming.com/discover/dairy-farming-facts/what-happens-to-male-calves/>

ⁱⁱⁱ Eblex Cow Beef Guide, 2014

^{iv} Alison O’Hanlon (2000) Assessment of Metabolic Stress in Dairy Cows, UCD Vet Medicine.

<http://www.ucd.ie/vetanimal/ahanlon.htm> Accessed: 17/05/2017

^v Melina, V, Craig, W, Levin, S (2016) Position of the Academy of Nutrition and Dietetics: Vegetarian Diets, *J Acad Nutr Diet*. 2016;116:1970-1980.

^{vi} Marchant-Forde et al, JN (2002) Responses of dairy cows and calves to each other’s vocalisations after early separation. *Applied Animal Behaviour Science* 78 (2002) 19–28

^{vii} Johnsen (2016) Is rearing calves with the dam a feasible option for dairy farms? —Current and future research. *Applied Animal Behaviour Science* 181 (2016) 1–11.

^{viii} Johnsen (2016) Is rearing calves with the dam a feasible option for dairy farms? —Current and future research. *Applied Animal Behaviour Science* 181 (2016) 1–11.

^{ix} Weary et al, (2000) Effects of early separation on the dairy cow and calf 1. Separation at 6 h, 1 day and 4 days after birth. *Applied Animal Behaviour Science* 69 2000 177–188.

^x Wagner, K, Seitner, D, Barth, K, Palme, R, Futschik, A, Waiblinger, S (2015). Effects of mother versus artificial rearing during the first 12 weeks of life on challenge responses of dairy cows. *Applied Animal Behaviour Science*, 2015; 164: 1.

^{xi} Lorenz, I (2013) Animal Health Ireland: Caring for the Newborn Calf. AHI CalfCare Technical Working Group.