

Unveiling the strategic discourse of european dairy industry pressure groups: A Critical Animal Studies perspective

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This article examines the discourse of pressure groups within the European Dairy Industry (EDI) using a Critical Animal Studies perspective. The study first identifies the EDI as a powerful economic actor by analysing its key companies, pressure groups, and their relationships. Then, it analyses the discourse constructed and the rhetorical devices these interest groups use regarding 1) the animals exploited by the industry and 2) the nutritional recommendations influencing dietary guidelines. The dairy industry forms a significant economic and corporate conglomerate that actively influences food recommendations and maintains extensive coalitions and lobbying efforts. The EDI interest groups tailor their narrative to align with current environmental, health, and animal welfare concerns while paradoxically contradicting them. Notably, the interest groups entirely disregard the interests of animals in their discourse, representing them as inanimate objects devoid of sentience, autonomy, and individuality through a series of rhetorical devices.

KEYWORDS: Pressure groups, interest groups, critical discourse analysis, rhetorical devices, dairy industry, strategic communication, critical animal studies.

Introduction

The dairy industry has historically held a prominent position within the dietary guidelines of Western nations (Comerford et al. 2021), serving as a crucial component of the European Community's economy (European Commission 2023). The European Dairy Industry's (EDI) milk production represents approximately 15% of the value of common agricultural production, is the largest product industry in the EU, and is the world's leading exporter of several dairy products. In 2022, total European dairy production reached 160 million tons of milk produced by 20,200,000 cows (Eurostat 2022).

Plant-based milk substitutes offer environmental, ethical, welfare, and nutritional benefits (Cullimore et al. 2023; Carlsson Kanyama et al. 2021; Feyza Aydar et al. 2020; Zandona and L. 2020). This article analyses the discourse of the EDI, exploring the discourse employed by its interest groups in relation to the animals they exploit and the dietary guidelines they promote. Studying the discourse of the dairy industry is essential as discourses play a key role in shaping our perception of reality, influencing how we understand events, issues, and individuals. By analysing discourses, researchers can uncover the wielding of power in shaping narratives (Foucault 1972; Fairclough 1989). Moreover, this study has also paid attention to specific rhetorical devices. Incorporating the analysis of rhetorical devices provides a more comprehensive understanding of how power, ideology, and social relations are constructed and maintained through language. Language is a non-neutral tool for exercising power; rhetorical devices play a crucial role in shaping discourse and can reveal implicit meanings, persuasive strategies, and ideological underpinnings (Fairclough 1989). Therefore, by studying dairy industry discourses and rhetorical devices, it is possible to gain insights into policy debate framing and how specific policies may reinforce industry interests and power structures (Gee 2014). Critical discourse analysis helps expose opaque structural relations and transparent dominance patterns in language (Van Dijk 2008; Meyer & Wodak 2001). By shedding light on these aspects, this research aims to contribute to a broader understanding of the industry's discourse that touts dairy products from cows as normal, natural, and necessary for humans (Joy 2010).

This study adopts the lens of Critical Animal and Communication Studies (CAMS), merging Critical Media Studies' perspectives with Critical Animal Studies' non-anthropocentric approach (Almiron, Cole, and Freeman 2016). The present research also draws inspiration from earlier works that expressed concerns about the role played by mass media language in legitimizing and concealing the oppression of animals other than (white, male) humans (Adams 1990; Dunayer 2001).

Research objectives

This research aims to study the discourse and the rhetorical devices used by pressure groups of the EDI, from a Critical Animal Studies framework through two research questions, namely:

- I. What is the discourse built by the main interest groups of the EDI regarding cows?
- II. What is the discourse built by the main EDI interest groups regarding European official dietary guidelines and recommendations?

Background: The european dairy industry

The dietary guidelines of Western countries have historically included recommendations related to dairy consumption, and its production and commercialization in Europe receive various subsidies. Although it was not always the case, over time, the consumption of dairy products derived from cows' milk has increasingly been associated with a healthy lifestyle, playing a crucial role in the European Community's economy. However, like animal agriculture in general, dairy production has been linked to different global problems related, among others, to the environment (e.g., Van der Werf et al. 2009; Leip et al. 2010; Thoma, G. et al. 2013; Rotz, C.A. 2018; Poore & Nemecek 2019), animal ethics (e.g., Desaulniers 2015; Eisen, J. 2017; Gillespie, K. 2018; Kolbe 2018; Wicks 2018), animal welfare (e.g., EFSA 2009; Eurogroup for Animals & Compassion in World Farming 2015; Broom 2017) and public health (e.g., Steinfeld et al. 2006; Deckers 2016; Nestle 2002; Velten 2010; Cullimore et al. 2023).

The life expectancy of cows used by the dairy industry is significantly reduced from their natural 15 to 20 years (Nowak 1997) to their premature slaughter for meat at the age of three to five (e.g., Young et al. 1983; EFSA 2009; Knaus 2009; Webster 2013, 35). Each year, these cows are forcefully inseminated, resulting, after nine months of gestation, in a calf being born and either killed, left to die, or incorporated into the gears of the dairy industry, depending on their gender and industry needs at the time (e.g., Phillips 2018; Wicks 2018).

Cows suffer from various diseases and painful conditions due to exploitation. According to an article commissioned by the Petitions Committee of the European Parliament, the primary concerns are leg disorders, mastitis, and reproductive problems, making dairy cows' poor welfare the second-worst animal issue in Europe after chickens bred for their meat (Broom 2017, 10). A report by Eurogroup for Animals

and Compassion in World Farming (2015) emphasizes the severe health and well-being issues faced by cows in Europe, particularly for zero-grazed cows. The magnitude of individual suffering is significant, with a high proportion of cows affected for a substantial part of their lives. However, despite clear recommendations in 2009, no EU legislation addresses this welfare problem (Broom 2017, 50-54).

Despite the European Food Safety Authority's conclusion that long-term genetic selection for higher milk yield is a leading cause of poor welfare and health issues, efforts to boost yields persist. Today, a cow produces ten times the amount of milk that would have produced in the 16th century (Rollinger 2007, 2), and their metabolic rate can be compared to a cyclist in the Tour de France, except for those, unlike cyclists, this rate is not a momentary peak, but maintained over time (Webster 2013).

The European dairy sector has experienced significant structural changes in recent decades, shifting from numerous small and medium-sized farms to a few large, highly technical, specialized, and high-productivity farms (Davidova et al. 2013). This move towards intensive industrialization has transformed family farms into more commercially oriented entities, emphasizing the prevalence of intensive farming over traditional family farming practices (Shmitt 1991; Friedmann 1980).

The activities of the dairy industry have diverse environmental implications, notably in terms of greenhouse gas emissions (e.g., Van der Werf et al. 2009; Leip et al. 2010; Rotz 2018). Additionally, dairy systems tend to be high-input, high-yield, and frequently involve intensive land use; the expansion of agricultural lands for dairy farming has adverse effects on biodiversity, leading to habitat fragmentation, loss of natural habitats, and a decrease in wildlife diversity (e.g., Phalan et al. 2011; Tscharrntke et al. 2012). Compared to plant-based alternatives, animal milk exerts a more substantial impact on greenhouse gas emissions and significantly influences land and water use (Poore & Nemecek 2019). There is sufficient evidence to encourage a dietary change from animal dairy products to plant alternatives based solely on environmental reasons (Carlsson Kanyama et al. 2021), moreover, scientists even suggest now that there is “no apparent health rationale for recommending cow's milk over plant-based milks” (Feyza et al. 2020; Zandona 2020; Cullimore et al. 2023).

In recent years, the plant milk industry has experienced significant growth, with a substantial rise in the consumption of plant-based milk substitutes (UC Davis Innovation Institute for Food and Health 2022, April). Plant-based milks now account for 16% of all milk sales (SPINS 2021). The global market size for plant-based milks currently stands at €11.47 billion, with a projected Compound Annual Growth Rate (CAGR) of 8.8%. By 2031, the market size is estimated to reach €26.75 billion (Future Market Insights 2021).

This growth in the plant milk industry has triggered a legal battle over the use of dairy-related terms for plant-based products globally. The conflict centres around the application of names like “milk,” “cheese,” and “yoghurt” to non-dairy alternatives. In Europe, Regulation (EU) 1308/2013, the Common Organization of the Markets in Agricultural Products (CMO), defines ‘milk products’ as exclusively derived from animals, reserving terms like milk, butter, and yoghurt exclusively for animal milk and its products. Under these regulations, soy-based drinks are prohibited from being called ‘soy milk’ in the EU. The 2016 case involving Tofu Town and the Verband Sozialer Wettbewerb (VSW) further emphasized the strict interpretation of CMO provisions, with the European Court of Justice (ECJ) upholding the protection of terms like “butter” and “cheese” for animal products (Leialohilani & de Boer 2020).

Traditional dairy producers advocate for reserving terms for animal milk-derived products, while plant-based proponents seek transparent labelling for consumer clarity. The debate extends to proposed food labelling systems, influenced by WHO’s 2004 Front-of-Package nutrition recommendation (Norum 2005). European groups propose schemes like “traffic light” and “nutri-scores” to aid healthier choices, facing industry resistance, claiming stigma and opposing mandatory or voluntary warning labels (Kanter et al. 2018).

For all the above, given the influence of lobbies and think tanks on shaping public policies and opinion, it is crucial to understand the strategic discourse that the interest groups of the dairy industry use to justify and promote its increasingly contested activity.

The influential power and intricate network of the european dairy industry

The dairy industry in Europe holds global significant importance, with the European Union playing a leading role in the worldwide production of cow’s milk. It contributes approximately 30% of the final global livestock production and represents 13% of global final agricultural production (Yubero 2016). Nevertheless, factors such as the elimination of milk quotas, reduced domestic consumption, and limited export capabilities have led to the EDI’s heavy reliance on financial support from European public administrations (Amat 2017, 28).

The European dairy sector encompasses prominent business groups that have achieved success and economic influence. Leading the global rankings based on turnover in 2022 were the major European multinational companies Lactalis (France), Nestlé (Switzerland) and Danone (France), with reported annual turnover figures from 20.1 to 27.2 billion euros (Ledman, M. & Scheper, S. 2023).

The organizations investing the most in lobbying for animal dairy products in Europe self-report a collective annual investment of around one million euros. When considering the annual self-reported investment of all organizations directly involved in the dairy industry (excluding professional consultancies or law firms), the figures range from €6,133,492 to €8,669,465. In contrast, animal defence organizations report investments ranging from €1,000,000 to €1,199,998, as disclosed in 2023 (European Transparency Register).

Upon scrutiny of the European Transparency Register, it is evident that the EDI wields significant influence due to its inter-representation in the network of relationships among stakeholders. These companies possess the power to shape the actions, legislative processes, and decisions of legislators, regulatory agencies, and public opinion. This network of industry entities includes think tanks and lobbying groups that engage directly with the European Commission, and affiliating with various coalitions. Through their think tanks, they actively participate in academic initiatives pertaining to food and science, generating and disseminating knowledge that aligns with their strategic objectives (Carreras 2021).

The voluntary nature of the European Transparency Register, combined with the absence of independent auditing (European Transparency Register n.d.), raises concerns about the accuracy of the disclosed information. With participation not mandated, there is likely underrepresentation of data. Despite these limitations, it is evident that the EDI and its interest groups wield significant influence, surpassing the impact of groups opposing their activities.

Methodology and sample

An examination employing critical discourse analysis has been conducted to a sample of 92 documents (including reports, press releases, internal bulletins, and position papers) disseminated by the primary interest groups affiliated with the EDI between 2008 and 2018. Throughout the analysis, the texts are observed from the critical discourse analysis perspective, which emphasizes the role of language and discourse in constructing social consensus, particularly within the context of political economy. The objective is to conduct a critical examination of the discursive reproduction of dominance, discrimination, power, and control manifested in language (Van Dijk 2008, Meyer & Wodak 2001).

This investigation focuses on written communication, with the goal of understanding how written language shapes meaning and mirrors social and political

practices. This analytical framework encompasses a focus on both the broader social context of language use and the deliberate use of rhetorical devices in discourse. A rhetorical device is a linguistic instrument that uses a specific structure or pattern of meaning and aims to elicit a particular understanding from the public (Kenney & Scott 2003). Acknowledging the significance of rhetorical devices as linguistic tools strategically wielded in discourse (Fairclough 1989), the analysis delves into how these devices are used strategically and how they create discourse to enhance the effectiveness and persuasiveness of communication. Various levels of language and discourse were observed, starting with an examination of the “macrostructure” of the text and then delving into the analysis of individual ideas and rhetorical devices, scrutinizing language nuances, design aspects, contents, sources, and actors mentioned, avoided, and targeted.

The examined corpus includes 92 documents authored by the following interest groups: the European Dairy Association (EDA), the European Milk Board (EMB), the European Association of Dairy Trade (EUCOLAIT), the Farmhouse and Artisan Cheesemakers European Network (FACE), and the European Food Information Council (EUFIC), presented in the table below (Figure 1).

The relevance of these groups has been measured by the economic investment dedicated to lobbying activity as it appears in the European Register and by the specificity of their messages on the dairy industry in relation to the issues that are the subject of this research. The requirements for considering the interest groups chosen were firstly that they develop their activity at a European level; second, that they had a direct relationship with the dairy industry, apart from EUFIC, which is not a specialized dairy interest group, but whose discourse is considered relevant enough at a European level in terms of what they say about dairy products, nutrition, and animals.

Organization	Focus/Area	Membership	Role	Annual lobbying/ Register
European Dairy Association (EDA)	Dairy industry representation and advocacy	Represents national dairy associations	Advocacy for dairy industry interests at European level	100,000 - 199,999 €
European Milk Board (EMB)	Dairy farmers' interests and pricing	Represents European milk producers	Advocacy for fair pricing and policies for dairy farmers	500,000 - 599,999 € + 190,064 € in EU grants
European Association of Dairy Trade (EUCOLAIT)	Dairy trade and commerce	Represents European dairy trade companies	Advocacy for trade policies and market access for dairy products	300,000 - 399,999 €
Farmhouse and Artisan Cheesemakers European Network (FACE)	Small-scale and artisanal cheese producers	Network of European artisan cheesemakers	Promotes the interests of small-scale cheese producers	10,000 - 24,999 €
European Food Information Council (EUFIC)	Food information and communication	Collaborative platform with various stakeholders	Provides information on food and nutrition	N/A
European Dairy Association (EDA)	Dairy industry representation and advocacy	Represents national dairy associations	Advocacy for dairy industry interests at European level	100,000 - 199,999 €

Figure 1: Selected European Dairy Organizations. Source: <https://ec.europa.eu/transparencyregister/public/consultation>; accessed on December 25, 2023.

Analysis

The results extracted from the Critical Discourse Analysis are presented below, organized around the two specific objectives of the research.

Main results RQ 1: What is the discourse built by the main interest groups of the EDI regarding cows?

Critical discourse analysis and the scrutiny of the rhetorical devices have made it possible to identify a group of ideas and strategies consistently employed throughout the texts of the sample of interest groups studied, particularly in their representation of cows. First, a table is presented to summarize these findings, followed by an analysis that explores the identified rhetorical devices, patterns and strategies.

Main results RQ 1: What is the discourse built by the main interest groups of the EDI regarding cows?	
<i>Discursive Strategies and Rhetorical Devices</i>	<i>Explanation</i>
1. Suppression of subjects	Industry omits crucial information about the pain, and diseases experienced by cows. Total silence surrounds the fate of cows, facing slaughter after three/five years, and the separation and killing of their offspring.
2. Metonymy	Labelling cows as “dairy animals”. Cows portrayed as machines producing food for humans.
3. Comparison to plants	Parallels between acquiring dairy products and plant cultivation. Cows discussed using terms associated with crops, normalizing and naturalizing their exploitation.
4. Alienation	Cows are reduced to mere food producers, neglecting their interests and autonomy. Concept of “naturalness.
5. Subjects as Property	Cows are depicted using possessive pronouns, emphasizing ownership.

6. "Animal welfare"	Term "animal welfare" frequently used without a clear definition, emphasizing economic gains.
7. "Protection of the environment"	Environmental benefits are emphasized, contradicting the industry's real footprint.
8. "Protection of the rural"	Idealized image of extensive farms, highlighting traditional aspects from the past.

Figure 2: Discourse and rhetorical devices of EDI Interest Groups on Cows (RQ 1)

1. Suppression of subjects: Omission of their existence and/or sentience

In analysing the discourse of the dairy industry, it is imperative to recognize not only what is explicitly stated but also what is deliberately left unsaid. While the ability of individuals to experience positive and negative emotions, known as sentience, is widely acknowledged in various animal species, including bovines, the industry strategically disregards this aspect. Recognizing this distinction is essential from an animal ethics standpoint, as it implies the need to protect sentient beings from suffering and fulfil their basic needs (Francione 1995). However, the communication from the industry systematically avoids addressing the pain, diseases, and ailments experienced by cows, choosing to omit crucial information about their suffering and individuality.

Moreover, a deliberate silence surrounds the fate of cows used in the dairy industry, as they ultimately face slaughter for meat after three to five years. Notably absent from the discourse is any mention of the significant relationship between cows and their calves. The industry treats calves as mere by-products, failing to acknowledge their inherent value. This intentional omission reflects the industry's awareness of the complex ethical issues at hand, as described by veterinarians Sarah E. Bolton and Marina A.G. von Keyserlingk (2021), labelling them as a "wicked problem."

2. Suppression of the individuality of the subjects: Metonymy

Another method of erasing subjects' existence is through the omission of their individuality in discourse. This is achieved using rhetorical devices such as metonymy, a "figure of speech that substitutes the name of one thing with that of another associated with it or possessing its attributes" (Merriam Webster n.d.), or in this case,

the exploited subject for the product they are used to produce. This is evident in the recurrent expression “dairy animals.” An example from one of the EDA documents states: “EDA is a full member of the EU Platform on Animal Welfare and brings forward there its support of every effort in keeping dairy animals healthy and well as key of its dairy production” (EDA 2019).

The dairy industry represents the cows it exploits as non-sentient machines driven solely by the objective of producing food for humans. EUFIC also refers to cows as “food-producing animals” (EUFIC 2016, December 9). In one of EDA’s press releases discussing the importance of forage in cows’ diet, they are portrayed as machines that convert the food they consume into valuable human protein: “Dairy cows have a unique ability to consume what for humans is non-edible food stock and turn it into the highest value protein for human consumption” (EDA 2020, April 20).

3. Suppression of the individuality: Comparison to plants

The objectification and suppression of animal individuality involve various strategies, another one of which is drawing parallels between the acquisition of dairy products and plant cultivation: “Milk is derived from animals and while there are production cycles like in many other agricultural sectors, the “harvesting period” and the “processing period” in dairy is essentially a daily one” (EUCOLAIT 2018, October 31). The initial statement, “Milk is derived from animals,” evokes the notion of a natural, perpetual flow of milk from the cows, akin to water springing spontaneously from a mountaintop.

Within this narrative framework, the industry propagates the idea that cows produce milk because they are designated as “dairy” cows, as if belonging to a distinct breed that produces milk independent of pregnancy and the need to nourish offspring, unlike other mammals. Through this array of expressions, cows are equated to non-sentient vegetables, effectively normalizing their exploitation by literally “naturalizing” it.

4. Suppression of the individuality of the subjects: Alienation

Another method to suppress individuality is by negating the subjects’ capacity for action and autonomy. The phrase “Animals produce food,” establishes a narrative that reduces individuals to mere food producers for humans. This affirmation dismisses the interests of animals, as it diminishes their vital purpose to being food providers, implying that their well-being is only relevant if it benefits humans, and normalizing and justifying the culling or slaughter of animals that do not meet human-imposed standards.

The notion of “naturalness” is also employed to justify animal exploitation, as exemplified in a paragraph from COPA-COGECA discussing guided tours in various exploitation businesses: “Many European farm and cooperative organisations are opening their doors free to the public in 2017, bringing consumers back in touch with nature and showing the many benefits of farming”. (EDA 2017 March 29)

This narrative is recurrently echoed in dairy industry documents, employing the association between animals and nature to situate their business within the evocation of the idyllic imagery of cows grazing free in the meadows and mountains. Furthermore, the dairy industry reinforces the naturalization of cow exploitation not only through verbal discourse but also visually. They employ two visual resources: the strategic use of colours, predominantly green and blue, commonly associated with the environment and health, and the incorporation of photographs depicting green pastures and blue skies. Despite the decline in European cow grazing practices as highlighted by van den Pol-van Dasselaar et al. (2020) these resources persistently feature in the analysed documentation.

5. Suppression of the autonomy: Subject as property

An additional method of suppressing individuality and autonomy involves depicting individuals as possessions rather than as autonomous entities with their own interests. This stands in direct opposition to current European legislation, which predominantly acknowledges animals as sentient beings rather than mere property (European Union 2006, 2007; Epstein & Bernet Kempers 2023). The industry’s narrative often frames animals as the farmer’s property, employing possessive pronouns such as “their” that indicates ownership: “High quality products come from dairy producers who take great care of their animals and provide them with high-quality feed” (EDA 2013).

6. Reiteration of benefits from the industry: Animal welfare

The dairy industry frequently employs the term “animal welfare” in its communications yet fails to provide a clear definition in the analysed documentation. Interest groups express their concern for “animal welfare” by arguing that it is crucial for producing safe and high-quality products, as well as ensuring the productivity and profitability of businesses. Their primary interest lies in the economic benefits rather than the well-being of animals, as illustrated in the following example:

[...] Animal care is essential to produce safe and high quality milk, just as it is essential to assure farm productivity and profitability. The essence of the well-being of dairy animals is followed when an animal is healthy, comfortable, well-fed and has access to safe clean drinking water, is safe, able to express normal behaviour and is not suffering unpleasant states such as pain, fear and distress (EDA 2015 May 8).

7. Reiteration of benefits from the industry: Environment

Interest groups within the dairy industry claim environmental benefits resulting from their operations. In contrast with what science says (as previously referenced), the industry downplays their environmental footprint and assert their commitment to promoting and protecting rural life. They argue that the reproduction of bovids aids in preserving animal biodiversity and improving land quality, as in the following example: “Farming dairy livestock helps to preserve animal biodiversity and revitalize landscapes. It also supports plant growth, restores grasslands, promotes biodiversity of plant and soil microorganisms, facilitates carbon sequestration, and improves land quality” (EDA, 2013).

The dairy industry asserts that its environmental footprint has a negligible impact, as indicated in an excerpt from an EDA document: “Figure 5 shows that avoiding all dairy products will probably have little impact on the overall environmental footprint of our diet” (EDA, 2013).

8. Reiteration of benefits from the industry: Rhetoric of protection of the rural

The industry expresses a commitment to preserving rural areas where their operations are conducted. They promote an unreal and idealized image of extensive farms and highlight the traditional aspects of dairy products, despite the European transition to intensive farming over traditional practices (Davidova et al., 2013; Shmitt, 1991; Friedman, 1980). According to an EDA document:

Rural areas are very important because they have always been the origin of many traditions. They are the birth-place of artisanal procedures, keepers of traditions and know-how, which give their products an added value appreciated by consumers. They ensure certain quality standards, they benefit farmers producing these products, and they are positive for external trade. (EDA, 2013)

Main Results RQ 2: What is the discourse built by the main interest groups of the EDI regarding dietary guidelines?

Critical discourse analysis and the examination of the employed rhetorical devices has made it possible to identify throughout the sample a series of main categories related to dietary guidelines. First a table is presented to summarize the patterns, followed by an analysis that explores the identified rhetorical devices and strategies.

Main results RQ 2: What is the discourse built by the main interest groups of the EDI regarding dietary guidelines?	
<i>Discursive Strategies and Rhetorical Devices</i>	<i>Explanation</i>
1. Appeal to Health	Use of health and nutrition sciences vocabulary to portray dairy as essential.
2. Appeal to Science	Appeals to science to highlight health benefits of dairy.
3. Targeting Vulnerable Groups	Targeting of specific consumer demographics, with emphasis on children.
4. "Dairy Protecting Shield"	Defensive strategy against plant-based substitutes.
5. Influencing Dietary Guidelines	Urging governments to promote dairy in dietary guidelines. Strategic timing of publications.
6. Euphemisms to avoid negative terminology	Suggest the use of positive and vague terms like "common sense" to promote dairy. Avoidance of negative associations with specific nutritional components.
7. Elitist Metaphors for Dairy	Mythological characterization, labelling milk as "white gold."

Figure 3: Discourse and rhetorical devices of EDI Interest Groups on dietary guidelines (RQ 2)

1. Appeal to health

Throughout the documents, the use of the words “health” and “nutrition” is seen as a recurring event: “Even more importantly, dairy matters to consumers. Affordable and high-quality milk, cheese, butter and other products, rich in protein and healthy natural fats, are a mainstay of European diets”. (EDA, 2018, June 25)

In a repetitive way, these types of terms are placed together with dairy products, so that through redundancy an association is carried out; for example, “dairy, nutrition and health”. (EDA, 2015, January 22)

They use vocabulary typical of health and nutrition sciences and identify their products with a healthy life, also using alarmist rhetoric, in which they refer to possible adverse effects in case of not consuming dairy products in sentences like the following one: “Consumers might hence lose out on nutrients when not eating dairy”. (EDA, 2013, January 22)

2. Appeal to science

The analysed texts employ appeals to science to reinforce health-related messages. In doing so, they strategically use redundancy, emphasizing that dairy products confer health benefits for all the diverse consumer groups they strategically target. They convey a continuing message of the nutritional properties of dairy and communicate that dairy has healing properties for various dairy diseases. Often, they communicate that even a reduction in their consumption could be fatal for health, and they do so sometimes by citing themselves as a scientific reference: “EDA bases its actions on science (...) The dairy sector has proved that milk and dairy are nutrient-rich and contain highly bioavailable essential nutrients. Reducing their intake could lead to poor nutritional status: a negative impact on health”. (EDA 2015, January 22)

Sometimes, scientific authority is invoked ambiguously, with individuals from unrelated fields presented as nutrition experts, often emphasizing their “doctor” title for scientific credibility. However, the specific field of their doctorate, which may not be related to health or nutrition, is often undisclosed. For instance, a person cited for nutrition-related statements may hold a doctorate in cybernetics. Uncovering their actual expertise requires additional research, as in the case of “Dr. Philippe Ankers, Chief of the Livestock Production Systems Branch at FAO, highlighted the benefits of milk and dairy as vital sources of nutrition for the world in his speech” (EDA 2014, October 14).

Equally noteworthy is what the communications omit. In the examined sample, there is a constant declaration that their products offer benefits to all individuals, frequently overlooking the fact that a significant majority of the population may be allergic or intolerant. It is estimated that 70-75% of the population have problems digesting lactose (Praveen et al. 2019; Corgneau et al. 2013; Delacour et al. 2017).

3. Targeting vulnerable groups as consumers

The industry strategically leverages the already identified scientific appeal to target specific demographics, including children, the elderly, and pregnant or menopausal women, asserting that they must consume dairy products to prevent health problems. Acknowledging the crucial role of children as a primary audience and the impact of initiatives like school milk subsidy schemes, this analysis specifically focuses on child-oriented communication.

3.1. Children as a specific target audience

The dairy industry strategically aims to attract new consumers during the earliest stages of life. This approach offers several advantages: a prolonged duration of product consumption in each individual and greater likelihood of sustained adherence throughout their lifetime (Krajnović, A. et al. 2019). One of the main messages in this regard is that dairy is necessary for “normal growth.” This type of message can be corroborated in statements such as the following from EDA: “Iodine, a nutrient that can be found in milk and cheese, plays an important role in children’s normal growth”. (EDA 2018, February 16)

The ascription of the adjective “normal” to the noun “growth” is relevant because it appeals to one of the most important wishes of parents, that of children growing “normally” and being healthy, and implying to the fact that consuming dairy can become a matter of life or death:

During childhood and adolescence, bones need high quality protein and calcium to grow and develop healthily and to maintain bone health later in life. Both protein and calcium are naturally abundant in milk and dairy products and their inclusion as part of home and school meals helps children develop a taste for milk from childhood and adopt healthy eating habits later in life. (EDA 2013, February 8)

Headlines such as “MILK AND DAIRY NUTRIENTS ARE IMPORTANT FOR CHILDREN’S HEALTH” [Capital letters and sky-blue colour in the original] (EDA, 2018 February 16) presented in capital letters and blue colour, illustrate the narrative the authors aim to construct. This intentional emphasis underscores their effort to convey a resounding message about the perceived significance of milk and dairy nutrients in promoting children’s health.

Industry interest groups expand their marketing focus beyond cow’s milk, actively promoting a diverse range of dairy products tailored for minors. This includes flavoured, high-sugar, and high-fat options, which also receive collateral subsidies, such as sugary desserts, chocolate-flavoured milks, and high-trans-fat cheeses. Despite the public perception that milk school programs contribute to the well-being of minors, the reality is that they primarily serve the interests of the dairy industry:

Regardless of flavoured or unflavoured, milk-based foods are not only rich in calcium but also in many other essential micro-nutrients. Increasing consumption among children under these schemes enhances the nutritional value of their diets in this important development stage and provides long term health benefits for our next generation. (EDA 2015, September 30)

4. *“Dairy Protecting Shield” against plant substitutes*

The dominant narrative identified represents dairy products of animal origin as foods with specific qualities that no other product would have and that make them deserve special treatment by the European institutions. At the same time, the analysed messages use negative rhetoric regarding vegetable substitutes, which are seen as negative competition for the EDI business. This strategy of attacking plant-based substitutes makes sense when we pay attention to the context of competition with the popularization of plant-based milks from other sources as oats, rice and almond from 2010 (Leialohilani & de Boer 2020) that finished with the EDI having granted a “monopoly” (Bolton 2017) on dairy terms.

Both the perceived threat and the need to develop a strategy in this regard can be verified in excerpts such as this one, which explains EDA’s own communication strategy and talks about the need to implement a “Shield Protector of Dairy” against the plant-based substitutes:

The positive image of dairy has however in recent years been misused by dairy substitutes and ‘ersatz’ products, that not only squander the positive characteristics and images of milk and dairy, but also their nutritional benefits.

In order to continue and improve the positive image of dairy, it will be vital to actively communicate the unique and specific qualities of our products. The baseline for our communication work is what we refer to as the 'Dairy Protective Shield', which is a comprehensive collection of positive arguments on dairy, as well as answers to questions. This project runs along five topical themes: environment, animal health & welfare, nutrition & health, dairy processing and a global sector. (EDA 2018)

Such admitted concerns are exemplified in text passages such as the following from EDA, which speaks of the protection of dairy terms in the European Union:

In light of specific milk qualities, the Council of the European Communities implemented on 2nd July 1987 a specific protection of dairy terms in Regulation (EEC) No 1898/87 on the protection of designations used in marketing of milk and milk products. (EDA 2017, July 4)

Whenever interest groups consider in their texts the existence of plant-based alternatives, they disqualify them, and the replacement of dairy, and the reduction of its ecological footprint, is represented as only "theoretical": "DID YOU KNOW... Dairy calcium is better absorbed than calcium from plant sources and accounts for more than 50% of children's total calcium intake in European countries". (EDA 2018, February 16)

Numerous statements related to plants that disentitle their nutritional capacity have been identified in the texts, detectable in sentences such as the following from EDA: "Whilst some plants are good sources of protein, most plant proteins are of low-quality" (EDA, 2013) or "In order to reach the same quantities of nutrients, we would need to consume quantities of fruits, vegetables and legumes far greater than the recommended daily portions" (EDA 2013).

5. Influencing dietary guidelines

The analysis reveals a recurring rhetoric in which interest groups urge governments and the European Commission to promote dairy consumption through dietary guidelines. These groups also provide guidance to dairy companies on how to convey these messages to authorities, emphasizing the importance of positive communication about dairy's benefits for nutrition, health, and the environment. As effective lobbies, the dairy interest groups know the importance of timing and strategically time their publications to coincide with relevant Commission reports or legislative initiatives, aiming to shape the ensuing discussions, as EDA explains in their 2015/16 Report:

Communication on dairy positives for nutrition, health and its role for the environment.

[...] It is our role as EDA to communicate on these positives and on different initiatives of the European institutions, using latest science and knowledge in its messages.

Communication is about messages and outreach, but also about timing. We managed at several occasions to have our EDA publications available in advance of relevant Commission reports or legislative initiatives – and hence we did set the framework for the discussions to come.

Our communication activities are relevant: the European environment in Brussels and beyond does not only read our publications, but perceives our communication in the way we want it to be perceived: as an invitation for further in depth discussion on the subject, as a clear sign of our commitment to be part of a constructive and inclusive dialogue. (EDA 2015)

6. Use of euphemisms to avoid negative terminology

Another rhetorical device used by the EDI's interest groups is euphemisms, recommending using positive terms such as “common sense” and “balanced diet” to promote the inclusion of dairy products in diets while avoiding negative associations with specific nutritional components such as trans-fats, sugar, or salt and advocating a holistic view of dairy products, supporting them “as a whole” and as “rich in essential nutrients” (EDA 2021, June 1). The approach sidesteps acknowledging potential adverse health effects associated with particular components of certain collaterally subsidized dairy products such as trans-fats (cheese), sugar (flavoured milk drinks), and salt (cheese) (WHO 2020).

Supporting these claims, scientific studies such as Kroenke et al.'s (2013) reveal a 53% higher risk of breast cancer associated with the consumption of certain cheeses. Similarly, McCann et al.'s (2017) study establishes a 49% higher breast cancer mortality among women consuming high-fat dairy daily, including cheese, ice cream, and whole milk.

These findings challenge the notion that all dairy products, especially those subsidised for children, are universally healthy. While low-fat dairy milk might not pose similar concerns, subsidising other dairy products for children appears contradictory, considering their potential health risks. The dairy industry's preference for vague language attempts to divert attention from these specific health concerns associated with the specific components of its products.

At the same time, from the industry, they not only advise their own entities on how to communicate but also define what public institutions should recommend and what not, and how they should do it:

The future EU strategy on nutrition and public health should not focus on reformulation. Instead, focus should be put on nutrition education and on the promotion of a healthy diet and lifestyle, including physical activity, in order to change consumer behaviour. (EDA 2013, January 22)

They discourage negative messaging and advocate for educating the public to compensate for potentially unhealthy food choices instead of helping them make healthier choices by providing clearer information. The use of terms like “nutrients to limit” instead of “avoid” is a deliberate strategy. It maintains the illusion that these nutrients are necessary while aligning with the industry’s preference for positive messaging:

EDA believes that voluntary labelling schemes used in addition to the nutrition declaration required by the EU law can be a useful additional tool for consumers if they fulfil a number of important criteria: such a scheme should look at the food as a whole and support foods rich in essential nutrients. Thus, it needs to include both nutrients to encourage and nutrients to limit in a diet, be in line with official dietary recommendations as well as be scientifically substantiated and stimulate a healthy dietary pattern. (EDA 2021, June 1)

Another example of this is opposing more transparent labelling systems like FoP, such as “traffic lights” or “nutri-scores” (Norum 2005, Kanter et al. 2018). The “common sense” resource is often used as a synonym for the “you have to eat everything” narrative, which is the one that benefits products that may have some nutritional contraindications, such as dairy products:

EDA had firmly protested against the support that this labelling scheme has received from the EU Commission and is still today at the forefront to criticise the ENL because of the use of portion sizes, the colour coded traffic light basis and the complete lack of consideration for micronutrients like vitamins and minerals. Already in February this year, Mars pulled out of the project. EDA will continue advocating for a common sense approach and a transparent nutrition labelling that reflects the unique nutrient richness of dairy products. (EDA 2018, November 28)

This aligns with Marion Nestle’s observation that the food industry benefits from “pseudo-truths”, such as the belief that all foods can be part of a healthy diet in

moderation. This perspective undermines the need for restrictive messages about any marketed products, even when their negative health effects are known. (Nestle 2002, 21)

7. Elitist metaphors for dairy as “white gold”

The dairy industry bases its communications on the oldest recommendations; they omit what does not interest their narrative, as well as the most modern recommendations that advise avoiding these types of fats. Furthermore, they make claims that suggest selling dairy as a perfect substance, in an almost esoteric style: “Beyond pure nutritional value, several other health benefits are known or have been suggested. Dietary guidelines in every EU country recommend dairy as part of the daily diet”. (EDA 2013)

At the same time, through the discourse of the dairy industry, a rhetoric is detected that gives milk a halo, a supernatural, almost mythological character. In this way, they come to call milk “white gold”: “To quote the EU institution, Milk is and will remain the white gold for the next decade”. [Capital letter on “Milk” in the original text] (EDA 2010 December 22)

By using an element such as gold as a metaphor, a rhetoric is being implemented that endows milk with qualities such as wealth, economic value, and even beauty. Also, gold is obtained through mining; an element found in the earth is extracted and traded with it; the dairy industry also, through this discourse, represents milk as a product that can be “extracted”; “derived”, as if it were an object that is somewhere and can simply be taken, leaving out of the representation relevant issues such as insemination, pregnancy, and the delivery of a calf, among others.

Conclusions

This study undertook a critical analysis of the specific rhetorical devices and the broad discourse employed by the main interest groups within the EDI. The key conclusions for each research question are presented below, finishing with overarching insights:

RQ 1: What is the discourse built by the main interest groups of the EDI regarding cows?

The analysed documents construct a speciesist discourse that rationalises the use of non-human animals for the industry’s purposes. This discourse disregards the interests,

sentience, autonomy, and individuality of cows. The industry's discourse helps the perpetuation of the exploitation of animals. This is an ethical problem as it denies and, therefore, delays necessary changes in the food chain to improve animal welfare, address environmental issues, and uphold human food justice.

The EDI employs various strategies to objectify cows and conceal the harsh realities of their activity, deliberately overlooking the correlation between milk production and pregnancy, concealing the necessity of forceful impregnations and the fate of resulting calves. This aspect, acknowledged by industry insiders as a “wicked problem” (Bolton & von Keyserlingk 2021), stands as a conspicuous vulnerability in their practices.

The industry also hides the relationship between the dairy and meat industries, fostering a positive image while obscuring how all dairy cows end slaughtered for their meat. Through metonymy, lobbies present cows as mere dairy machines, contributing to a misleading perception of the “dairy cows” being a breed that “naturally” “gives” milk.

Furthermore, the industry strategically tailors its narrative to align with current societal values and even with the discourse advocated by environmental and animal activists, incorporating references to science, the environment, human health, and even animal welfare in their discourse, while contradicting these values in its daily practices. This incongruity between rhetoric and reality becomes evident when examining the industry's ambiguous declarations regarding the declarations of “animal welfare,” juxtaposed against their clear prioritization of economic gains, and their dismissive stance towards the sustained illnesses experienced by dairy cows, positioning these issues as the second most pressing concern in European animal welfare (Broom 2017, 10).

To summarize, the industry perpetuates a narrative depicting idyllic scenes of green pastures and blue skies, masking the growing prevalence of intensive farming practices and extended periods of confinement indoors—a trend that has grown for decades. The EDI 's carefully crafted discourse, while outwardly aligning with societal values and activist narratives, belies a significant disparity with its actual practices. The deliberate veiling of critical aspects, such as the impact of intensive farming, the challenges in the lives and deaths of cows and calves, underscores an urgent need for a critical re-evaluation of the industry's narrative and practices to address the incongruities that persist.

RQ 2: What is the discourse built by the main interest groups of the EDI regarding dietary guidelines?

Based on the analysis of the sample of texts used to study the discourse of the EDI interest groups, it is observed that the dairy industry implements discursive strategies to wield influence over dietary guidelines. A pivotal assertion posits milk consumption as integral to maintaining good health. Interest groups not only propagate positive messages but also strategically counter negative narratives by employing appeals to science, targeting specific vulnerable consumer groups, discrediting vegetable substitutes, pressuring institutions to endorse favourable policies, critiquing restrictions on dairy products, and bolstering their arguments through guideline endorsements. This orchestrated effort extends to hyperbolically portraying milk as a near-magical product with an ethereal aura.

The dairy industry lobbies constantly use scientific health and nutrition language, employing terms and imagery to associate dairy products with essential health benefits. This extends to claims that dairy is indispensable for individuals with allergies and intolerances, a demographic encompassing a significant majority of the population. The invocation of scientific authority even involves referencing “experts” from unrelated fields to support health-related statements.

The dairy industry lobbies do an excellent job targeting specific consumer groups, particularly infants, tailoring its discourse for maximum lifetime impact. This targeted approach capitalizes on the potential benefits for the industry derived from establishing an early connection with its audience. Also, the dairy industry endeavours to position dairy as a unique product deserving special consideration, employing a positive “holistic” rhetoric that sidesteps the detrimental characteristics inherent in its sugary and fatty products targeted to children. At the same time, a negative and defensive rhetoric is adopted against the rising relevance of plant-based substitutes, complemented by other lobbying strategies, such as legal challenges.

Overall Observations and Implications

In a broader context, the EDI’s considerable influence emanates from a complex collaborative network, constituting nodes with economic, political, and discursive power. In comparison to animal advocacy groups, the dairy industry not only invests more in terms of financial resources and time but also employs an “inter-representation” strategy, which means that each company maintains its own lobbies and think tanks

staffed with experts advocating and conducting research on their behalf, while simultaneously, these companies integrate into various coalitions, federations, and even deploy different legal teams representing them. This “inter-represented” approach ensures a comprehensive representation of their interests from various angles, which the advocates for the animals do not have.

Furthermore, it is crucial to note that the present study exclusively examines lobbying activities within the EDI, thereby omitting analyses of additional strategies such as public litigation against competitors, sponsored advertising, and other communicative efforts. It is important to acknowledge that all these activities combined, often facilitated by public subsidies, constitute an integral component of the industry’s multifaceted approach but fall beyond the scope of the current research.

In essence, the dairy industry relies not only on public financial support, but also on narrative sustenance. This support is derived from, among other factors, an array of highly effective lobbying strategies, such as assuming the role of an influential advisor in shaping decisions and promoting language favourable to their activities. Another example of their excellent lobbying is to synchronize the timing of publications with relevant Commission reports or legislative initiatives, amplifying the impact of their discourse. As a critical countermeasure, animal advocacy groups should aspire to a parallel operational standard; however, this poses a significant challenge without access to comparable resources for communicative efforts.

The adaptive nature of the industry’s lobbies accentuates a paradoxical approach: a calculated public alignment with prevailing societal values coexisting with activities that directly contradict these very concerns. As we draw this analysis to a close, it becomes unequivocally clear that addressing this incongruity demands a vigilant and strategic approach from animal advocates as well.

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