

The New Merchants of Doubt

References

Numbered notes (1 to 1506) are the endnote markers printed in the body text; numbers 607 to 611 are not used. Table references (T1 to T196) and lettered table notes are the markers printed in the tables. Both are listed by chapter, with each table's notes and references under the table they belong to.

Introduction

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 - Holding annual emissions constant (business as usual).
 - Reducing methane emissions from manure by 40%.
 - Reducing methane emissions from manure by 40% and reducing enteric methane emissions by 10.6%, with one-third of the dairy cows in the state utilizing Bovaer.While the first scenario won't succeed in getting the dairy sector to climate neutrality by 2030, the second and third options will allow it to be climate neutral (and more) by 2027.
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Table 1.1: Net-Zero Targets

Table notes

- A. Companies have set these targets, though they are not always substantiated or robust. ‘Net zero targets’ includes companies that have said they are working to net zero but have not provided a date as well as companies who are working toward ‘carbon neutral’ or ‘climate neutral’ goals.

- B.** The SBTi website has been used as the source for targets where this information was available on the SBTi's dashboard. Where this was not available, we have used other, company sources.
- C.** The SBTi website has been used as the source for targets where this information was available on the SBTi's dashboard. Where this was not available, we have used other, company sources.
- D.** Dairy Farmers of America does not appear to disclose its emissions in its latest (2022) Sustainability Report and doesn't report to the Carbon Disclosure Project.
- E.** Danish Crown says that: 'Given the high complexity of scope 3 emissions and our reliance on third-party data, scope 3 emissions for 2022/23 will be available in May 2024.' (Source: Danish Crown Annual Report 2022 - 2023, p10; see endnote 6)
- F.** Percentage based on data declared for 2021/2022 (Source: Danish Crown 2021/2022 Sustainability Report; see endnote 7).
- G.** Danone also reports its percentage decrease in methane emissions (13.3%) between 2020 and 2023, though doesn't appear to report a total figure. (Source: Integrated Report 2023; see endnote 8, p15)
- H.** Fonterra commits to a 50% absolute reduction in Scope 1 and 2 emissions by 2030. (Source: 2023 Sustainability Report; see endnote 9)
- I.** Fonterra is working towards a 30% intensity reduction in Scope 1 and 3 FLAG emissions from dairy by 2030, a target it announced in November 2023. (See endnotes 11 and 12)
- J.** FrieslandCampina reports figures for 'Scope 3 member milk' which is taken to account for most if not all of its Scope 3 emissions (Source: Carbon Disclosure Project 2023; see endnote 15)
- K.** Itoham says, 'Our Group has formulated targets of halving Group greenhouse gas emissions (Scope 1,2) by 2030 (compared to FY2016) (Source: 2023 Integrated Report; see endnote 16)
- L.** No mention of Scope 3 reduction targets anywhere in its 2023 Integrated report, though there is mention of the Scope 1 and 2 reduction goals above.
- M.** Itoham reports 210,273 tCO₂ Scope 1 emissions, 160,605 tCO₂ Scope 2 emissions, and 6,952 tCO₂ Scope 3 emissions its 2023 submission to the Carbon Disclosure Project and appears to have disclosed its 2021 figures on the its website. (See endnotes 17 and 18)
- N.** JBS will reduce its global scope 1 and 2 emission intensity by at least 30% by 2030 against base year 2019. (Source: 2022 Sustainability Report; see endnote 20).
- O.** Although JBS said its net zero pledge will cover all Scopes (see endnote 20) the company has not set Scope 3 emissions reduction targets.
- P.** JBS reported Scope 3 emissions partially in its 2021 Sustainability Report, though with numerous exceptions and omissions. (Source: Sustainability Report 2021/2022; see endnote 22). Its 2022 sustainability report says: we are currently updating our global scope 3 GHG emission footprint against the newly released FLAG Guidance and draft GHG Protocol Land Sector Removals Guidance. It appears JBS' 2023 filing with the Carbon Disclosure Project is based on 2021 data. (See endnotes 20 and 23) Table 1.1: Net-Zero Targets
- Q.** At least 50% less GHG emissions by 2033 (scope 1 & 2) (Source: Lactalis 2022 Sustainability Report; see endnote 24)
- R.** Lactalis has no mention of Scope 3 reduction targets alongside other mentions of its climate goals in either its latest sustainability report or its 'Climate Plan, though it does have targets for Scope 1 and 2 emissions. (See endnote 24 and 25)
- S.** Mengniu had said it is working toward 'carbon neutrality by 2050', and refers to its environmental strategy overall as efforts to reach 'carbon net zero. (See, for some examples, footnotes 27, 28 and 29).
- T.** Mengniu pledges to reach 'peak' Scope 1 and 2 emissions by 2030. (See footnotes 27 and 29).
- U.** Mengniu said that, by 2030: 'the GHG emission intensity of a single ton of dairy products should be within 160kgCO₂e/t.' The company has an interim target of intensity of 165kgCO₂e/t by 2025, and reported 168kgCO₂e/t for the latest reporting year. This appears to be its only targets relating to Scope 3 emissions.' (Source: 2022 Sustainability Report; see footnote 27)

- V.** Mengniu's 2022 Sustainability Report disclosed Scope 1 and 2 emissions (p69) - reporting these as 1.43 million tonnes CO₂e, but did not disclose Scope 3. It states that in 2021 its Scope 3 emissions amounted to between 10 and 14 million tons CO₂e, however did not provide a more detailed breakdown. (Source: 2022 Sustainability Report; See footnote 27)
- W.** In addition to reporting its total Scope 3 emissions in its latest roadmap (see footnote 30, p8), Nestlé also reports the share of its total Scope 3 emissions that were methane, which was 34% in the last reporting year (p13).
- X.** Tyson Foods latest (2022) sustainability report says 'that the company is re-baselining and calculating a comprehensive Scope 3 emissions footprint, using the latest guidance and protocols.' The company has reported its Scope 3 emissions previously, however, appears not to include this data in either its 2022 or 2021 sustainability reports. (Source: 2022 and 2021 Sustainability Reports. See footnotes 31 and 32). Its 2023 submission to the Carbon Disclosure Project says: 'In FY22/FY23, we completed a full Scope 3 emissions inventory using
- Y.** Vion provides figures for Scopes 1 and 2 for 2022 on p44 and p96-97 ESG 2023 Report. It also provides figures for emissions 'on farms we have measured' on page 92. In 2022, Vion has pushed back against claims it does not report against Scope 3 emissions, however as of 2023, it still did not appear to report Scope 3 for all of its farms, or Scope 3 emissions from other sources
- Z.** Vion says it has a target covering FLAG emissions, however it appears that this has not been approved by the SBTi as it does not appear on the SBTi dashboard (Source: 2023 ESG report, p84; see endnote 34)
- AA.** According to the World Benchmarking Alliance' 2023 analysis of company targets, WH Group has a timebound target to reduce Scope 1 and 2 emissions. (See endnote 36)
- AB.** According to the section on its sustainability webpage relating to its climate targets, WH Group aims to 'reduce GHG emissions per unit of product by 30% by 2030 compared with a 2017 baseline [sic]'. (See endnote 35)
- AC.** As of the latest reporting year. WH Group reports its emissions for both US and China regions in its 2023 ESG report (p81) (The group previously just reported its US emissions). However it does not appear to report for its European businesses, represents 9% of its business. (See endnotes 35 and 37)
- AD.** Yili says: We strive to decrease the intensity of Scope 1 and 2 carbon emissions by over 50% by 2030, relative to our 2012 levels, and we aim to achieve a year-on-year reduction in our total carbon emissions.' (See endnote 38, p.50).
- AE.** Yili says: We strive to decrease the intensity of Scope 1 and 2 carbon emissions by over 50% by 2030, relative to our 2012 levels, and we aim to achieve a year-on-year reduction in our total carbon emissions.' It also states: 'By 2030, greenhouse gas emissions intensity of our selected low-carbon suppliers* (Scope 3) will be reduced by 50% compared to the 2021 baseline.' (Source: 2023 ESG report; see endnote 38, p.50). According to the World Benchmarking Alliance, Yili 'had a prior goal to reduce carbon emissions per ton of dairy produc
- AF.** In its latest sustainability report, Yili only reports its scope 1, 2 and emissions intensity figures. The company says it is currently working on more comprehensive life-cycle assessments for its products. (See endnote 38, p53 and p87).

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2. Delay

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Table 2.1: Keyword mentions in net-zero strategy materials

Table notes

- O. Keyword mentions in sustainability documents, PR materials and net zero strategies of companies with climate targets. Research conducted April 2024. on advertising budgets than on climate solutions. Even when specific technical fixes prove promising in the pilot projects, companies refuse to invest in them from their own pocket, instead asking the taxpayers to foot the bill. One of the examples
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Table 2.2: Evaluations of measures to reduce methane emissions

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3. Derail

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661. MEPs European Parliament (n.d.) *Ulrike Müller*.
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662. Ulrike Müller's 9th Parliamentary term DoI shows she is currently, and was in the three years previous to the current EP mandate, earning income from Landwirtin, i.e., "farmer" (€500–1,000/month).
663. MEPs European Parliament (n.d.) *Andrzej Grzyb*.
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664. Andrzej Grzyb's 8th parliamentary term DoI shows he earned income (€500–1,000) from "Gospodarstwo rolne," i.e., "farm."
665. MEPs European Parliament (n.d.) *Peter Jahr*.
https://www.europarl.europa.eu/meps/en/96772/PETER_JAHR/declarations
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671. Herbert Dorfmann's 9th Parliamentary term *Dol* shows he was previously a Freelance agronomist (€500–1,000 a month) (see citation 733). Additionally, his EPP bio notes that he was a director of the South Tyrolean farmers' association for nearly 10 years (see citation 734).
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679. Between 5 April 2020 and 5 April 2022, Commissioner Wojciechowski had 20 meetings with Copa and/or Cogeca, and/or their member groups, compared to just 11 meetings with NGOs and civil society groups.
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689. As of April 2023, we found at least 29 revolving door cases among the 70+ lobbyists accredited to the European Parliament, who work for the Meat and Dairy companies or their lobby groups. Some of these involved only traineeships in the European Parliament or European Commission, while others were more significant and involved more senior positions.
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696. The EDA internal document states: "In large-scale dairy operations, anaerobic digestions can produce enough energy to cover internal requirements and even feed back into the public energy grid." Despite the paper itself containing the caveat "It is meant to be used, e.g., for reactive statements in case of additional questions from the media. Please do not publicly share this document as such." It was publicly available to view as of May 2023. See citation 755.
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Table 3.1: Green Deal policies derailed by Big Meat and Dairy and agri-industry lobbying

Table notes

Y. See e.g. doc 4.3, 5, 15.1, [ONLINE] Available at:
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Table 3.2: 25 Key Trade Groups with Big Meat and Dairy Company Members

Table notes

- AE.** The most recent year for which EU lobby spending was declared, as of April 2023 when the Transparency Register entries were checked.
- AF.** For cross-sectoral business lobby groups, only meetings on relevant topics (ie agriculture/climate/sustainability/consumer-labelling) are counted.
- AG.** Mostly direct members/board members, but in some cases, where the trade group's membership is comprised of national associations, the companies are members of the national associations. In the latter case, it is written as 'Company (via National association)' e.g. Groupe Bigard (via Culture Viande).
- AH.** Cross-sectoral business lobby AmCham EU had a total of 161 meetings, but only the 21 meetings on agriculture/climate/sustainability/consumer-labelling related topics are included.

- AI.** According to Lactalis' Transparency Register entry, which says 'The company is member of several associations, of which European Dairy Association-EDA is the most important (via membership to the French Dairy Association – ATLA)'
- AJ.** Members include national associations, including Culture Viande (whose board members include Groupe Bigard)
- AK.** It says 'Does not represent commercial interest.'
- AL.** It says 'Does not represent commercial interests.'
- AM.** As listed in Breiz Europe's Transparency Register entry.
- AN.** Members include national associations, including Culture Viande (whose board members include Groupe Bigard).
- AO.** Cross-sectoral business lobby DI had a total of 39 meetings, but only the 3 meetings on agriculture/climate/sustainability/consumer-labelling related topics are included.
- AP.** Members include Arla Foods amba and multiple Danish Crown companies (including Danish Crown A/S, Danish Crown A/S DC Beef, Dc Pork Rønne ApS, Friland A/S).
- AQ.** One of the Vice-Chairmen of Culture Viande is from Groupe Bigard, and the board of directors includes two board members from Groupe Bigard.
- AR.** As listed in Dairy UK's Transparency Register entry, its members include Arla Foods, Saputo Dairy UK, and Lactalis.
- AS.** Its members include national associations, including Denmark's Landbrug & Fødevarer/ DAFC (of which Arla Foods and Danish Crown sit on the board), Germany's Deutscher Raiffeisenverband - DRV (of which DMK is a board member and member of the dairy industry committee), the Netherlands' Nationale Coöperatieve Raad – N.C.R. (of which FrieslandCampina is a member), Sweden's Lantbrukarnas Riksförbund (LRF) (of which Arla Foods and Danish Crown are listed as 2023 members of LRF Milka), and France's La Coopération Agricole
- AT.** EDA's board members include ARLA FOODS amba, DMK Deutsches Milchkontor GmbH, Lactalis and Danone. In addition, in their own Transparency Register entries, Nestle and FrieslandCampina declare being members of the EDA.
- AU.** Eucolait direct members include Lactalis Ingredients. In addition, in their Transparency Register entries, Nestle and Fonterra declare being members of Eucolait.
- AV.** Members include national associations, including Denmark's Landbrug & Fødevarer/ DAFC (of which Arla Foods and Danish Crown sit on the board), and Sweden's Lantbrukarnas Riksförbund (LRF) (of which Arla Foods and Danish Crown are listed as 2023 members of LRF Milka).
- AW.** Notably, FoodDrinkEurope's president is Marco Settembri, Nestle's CEO Zone Europe.
- AX.** Its members include JBS Global (UK) Ltd, Tyson International, Inc. Europe, Tyson Foods,
- AY.** According to DAFC's website (as of April 2023), its main board includes a Vice-chairman who is a board member of Arla Foods, plus three more reps from Arla Foods and four from Danish Crown.
- AZ.** According to LRF's website, which lists both Arla Foods and Danish Crown as 2023 members of LRF Milk (and Arla Foods also declares in its Transparency Register entry that it is a member of LRF Mjölkl).
- BA.** Its members include Fonterra, FrieslandCampina Ingredients, Nestlé Health Science.
- BB.** Its members include Arla Foods Deutschland GmbH, Arla Foods Deutschland GmbH Molkerei Karstadt GmbH, Arla Foods Deutschland GmbH Pronsfeld branch, Arla Foods Deutschland GmbH Upahl branch, Danone Deutschland GmbH, DMK Deutsches Milchkontor GmbH (and subsidiaries – e.g. DMK Baby – and various regional addresses), FrieslandCampina Germany GmbH (various regional addresses), Lactalis Deutschland GmbH, Lactalis Group Ltd, Lactalis Dutch Cheese GmbH, Lactalis Nestle Frischeprodukte Deutschland GmbH, Nes
- BC.** According to NFU Mutual's website as of April 2023, one of its board members is a Special Adviser to Saputo UK.
- BD.** Its members include include Arla Foods B.V., Royal FrieslandCampina N.V.

- BE.** According to NZIBF's Transparency Register entry, which lists Fonterra Co-operative Group as a member.
- BF.** Organisational members listed in UECBV's Transparency Register entry include Lanbrug&Fødevarer/DAFC (of which Arla and Danish Crown are board members), Culture Viande (of which Group Bigard a board member), and International Meat Trade Association (of which JBS and Tyson are members).
- BG.** Its members include Dairy Farmers of America, Inc., Lactalis Ingredients (US), Saputo Cheese USA Inc. One of the most important actors when it comes to the derailing of EU legislation to tackle livestock methane emissions is Copa-Cogeca, comprised of European farmers (Copa) and European agri-cooperatives (Cogeca). As the leading agri-lobby group in the EU, Copa-Cogeca not only has a reputation for pushing the interests of the

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