

15 March 2016

The World Bank
1818 H Street
NW Washington
DC 20433
USA

By email: safeguardconsult@worldbank.org

Dear Sir, Madam

World Bank Safeguard Policies: Second Draft of Environmental and Social Framework - Phase 3 Consultation

RSPCA Australia appreciates the opportunity to comment on the second draft of the World Bank's Environmental and Social Framework for investment project financing.

As Australia's largest and most trusted animal welfare organisation, the RSPCA is committed to improving and promoting the welfare of animals throughout their lifetime.

Animal welfare, as distinct from animal cruelty, is important to ensure that all animals receive an appropriate level of care when it comes to their physical requirements (food, water, shelter, a comfortable resting area, and prevention and treatment of injury and disease) as well as their behavioural needs (ability to express natural behaviours and avoid experiencing distress).

It is extremely disappointing that there is no mention at all of animal welfare in this document despite, for example, ESS6 stating it addresses the "sustainable management of living natural resources" including livestock and marine/freshwater organisms. The definition of sustainable in this context needs to include animal health and welfare. Long-term sustainability requires a balance to be achieved between environmental, social and economic considerations. However, it would not be acceptable that when weighting these considerations, a situation results where animal welfare is compromised. A sustainable system is one where animal welfare is not compromised.

There is no consideration in the draft Framework of the relationship between animal welfare and productivity, industry competitiveness, market access or consumer confidence. It is clear that, for example, low-stress handling, improved husbandry, rearing, transport and slaughter conditions all affect productivity and quality. It is also clear that consumers' ethical values influence their purchasing decisions and products with good animal welfare attributes are gaining market share. Aligning production practices with these ethical values will result in a more sustainable production model than if they were not.

There is no guarantee that animal welfare will be taken into consideration into any decision-making process by simply referring to codified standards as is done in paragraph 33 on page 100.

The Framework should at the very least reference sections 7 of the OIE Terrestrial Animal Health Code and the OIE Aquatic Animal Health Code as these largely outline basic recommendations of animal care. However, we advise caution in a blanket approach in applying the OIE recommendations as they allow some unacceptable practices such as slaughter without prior stunning and restraining devices that invert a fully conscious animal prior to slaughter.

RSPCA Australia

ABN 99 668 654 249
ACN 163 614 668

P 02 6282 8300
F 02 6282 8311
E rspca@rspca.org.au
W rspca.org.au

PO Box 265
Deakin West ACT 2600



The International Finance Corporation, a member of the World Bank, has developed a Good Practice Note on 'Improving animal welfare in livestock operations' which was updated in December 2014. RSPCA Australia recommends that the practices mentioned in this Note be reflected in the Framework. This could be done by including an additional ESS that focuses on animal welfare.

We urge the World Bank to consider the role of animal welfare within the global livestock and aquaculture industries in more depth when finalising the Framework.

Sincerely

A handwritten signature in cursive script that reads "Heather Neil".

Heather Neil
Chief Executive Officer
RSPCA Australia