About Animals Australia & Animals International
Animals Australia is Australia’s foremost national animal protection organisation, representing some 40 member groups and over 1.5 million individual supporters — spread across Australia and around the world. Animals International is the global arm to Animals Australia’s work.

General comments on animal welfare
The welfare of animals raised and killed for food is an issue of increasing concern to people globally. This trend is reflected in the growing shift — by customers, corporations (e.g. Nestle, Unilever), financial institutions (e.g. European Bank for Reconstruction and Development) and in legislation — away from extreme confinement systems and permitting surgical procedures without pain relief, towards higher welfare standards for farm animals in global markets.

In markets where demand is quickly shifting towards higher welfare practices, less forward looking businesses (such as the battery cage egg industry in Australia) are finding that they are at risk of losing their return on investment for infrastructure that no longer meets customer expectations for animal welfare.

The World Bank Group is in a unique position to help ensure that businesses seeking funding do not invest in the infrastructure and practices of intensive agriculture which will rapidly become redundant as global markets require higher welfare standards. By doing so, WBG will be helping to protect billions of animals from extreme and unnecessary suffering, whilst helping local farmers have the best chance of gaining access to, and remaining competitive in, domestic and international markets.

Section: A Vision for Sustainable Development
Page 6, para. 5, first bullet:
For the Safeguard Policies to meet the objective of being inclusive, the welfare of animals needs to be taken into consideration. This point fails to include non-human animals. In addition, positive outcomes should also be sought, not just negative outcomes avoided or mitigated.

Therefore, we suggest:
Promote positive outcomes while avoiding or mitigating adverse impacts to people, animals, and the environment.

Section: World Bank Environmental and Social Policy for Investment Project Financing
Page 9, para. 2:
As stated above, positive outcome should be sought, and animal welfare should also be included.

Therefore, we suggest:
To this end, the Bank has defined specific Environmental and Social Standards (ESSs), which are designed to seek positive outcomes while avoiding, minimizing or mitigating the adverse environmental, animal welfare, and social risks and impacts of projects.

Page 10, para. 4(b):
As noted above, the welfare of animals in the food industry is a significant and pressing social issue globally, and one that is quickly gaining greater attention. If the WBG’s Safeguard Policies are to keep pace with the changing times and be inclusive, animal welfare — particularly of farm animals — is an important factor for the WBG to explicitly take into account in its due diligence.
Therefore, paragraph 4(b) should specifically include animal welfare by adding an additional bullet: 
...(viii) risks associated with and impacts on the welfare of animals in animal husbandry.

Page 11, para. 6: 
We believe it is important to include instruction on how to interpret and apply the standards when more than one applies to a specific project, which is a common situation.

Therefore, we support the addition of a new paragraph 7 to follow paragraph 6, stating: 
*Where more than one standard applies to a project, the Bank and Borrowers will seek to maximize co-benefits and, where there may be conflicting goals, avoid and minimize negative trade-offs. Such is the role of pursuing sustainable development.*

NOTE: That the current paragraph 8 would need to reference this new paragraph in addition to paragraph 7.

Section: ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

Page 101, para. 39: 
To avoid any ambiguity in interpretation, and to ensure all stages of production and animals on all size farms are covered, the sentence needs to be amended in three ways: 
Firstly, referring to GIIP alone is too ambiguous. To ensure any meaningful welfare standards are upheld, the IFC’s Good Practice Note needs to be explicitly included as the WBG’s main document defining GIIP in animal welfare.

Secondly, the welfare of animals on all farms, irrespective of size, is important and should be covered by these standards (and the draft offers no definition of “large scale”, leaving the sentence ambiguous).

Thirdly, it should be made clear that the policy covers all stages of animal production with implications for animal welfare.

Therefore, we suggest: 
*Borrowers involved in large-scale commercial farming, including breeding, rearing, housing, transport, and slaughter of animals for meat or other animal products (such as milk, eggs, wool) will employ the Good Practice Note on Improving Animal Welfare in Livestock Operations, and other GIIP, whichever is most stringent, in animal husbandry techniques, with due consideration for religious and cultural principles.*

Thank you for your consideration.

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