The European Bank for Reconstruction and Development has already adopted a binding animal welfare policy that prohibits the expansion of extreme confinement systems and supports transition to higher welfare housing. This move will not only help reduce the suffering of farm animals in Central Asia and Eastern Europe, but it will also help farmers and other food industry stakeholders in the countries served by the EBRD to stay competitive in domestic and international markets. Such policies will also create market opportunities for small farmers, as smaller farmers already raise their animals in extensive or cage-free systems.

We need similar policies impacting investment and agricultural development in Vietnam and throughout Southeast Asia. Therefore, we request the World Bank to strengthen the language in ESS6 of the Safeguards Policy to explicitly reference the IFC’s Good Practice Note on improving Animal Welfare in Livestock Operations. Our specific comments relate to ESS6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources) are as follows:

**SPECIFIC COMMENTS ON ESS6:**
Page 101, para. 39: In order to avoid difficulties in interpretation and to cover all important stages of production, the sentence needs to be amended in three ways: First, as referring to GIIP alone is too ambiguous, the text should explicitly list the IFC’s GPN as the World Bank’s main document defining GIIP in animal husbandry. Second, the paragraph shall apply to all commercial animal farming operations, irrespective of their size, as the welfare of farmed animals is important on both smaller and large-scale operations (and the draft does not define “large scale”). Further, the standards in the IFC’s GPN are already being met by the small farmers in our region, and any improvements they mandate (i.e., better feeding practices) will improve financial outcomes for our small farmers. Finally, it should be clear that the policy shall cover all stages in animal production with implications for animal welfare.

Therefore, we suggest the following:

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.