As one of the world’s largest animal protection organizations working to protect all animals, Humane Society International believes the Second Draft of the Environmental and Social Framework (July 2015) is still lacking with regard to the treatment of animals used in agriculture.

Our specific comments to the document are the following:

Section “A Vision for Sustainable Development” (pp. 4 et seq.)

Page 6, para. 5: The current draft fails to indicate that positive outcomes are to be sought, not just negative impacts avoided or remedied. Additionally, impacts on non-human animals are left out. Therefore, page 6, paragraph 5, first bullet, should read: “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” (pp. 8 et seq.)

Page 9, para. 2: As stated previously, positive outcomes should be sought. Therefore, the second sentence should read: “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 and social risks and impacts of projects.”

Page 10, para. 4(a)(v): Animal agriculture is one of the largest contributors to the world’s most serious environmental problems. Therefore, it should be specifically included here to say: “those related to the use of living natural resources, such as animal agriculture, fisheries and forests....”

Page 10, para. 4(b): The treatment of animals in the food industry is a prominent social issue throughout the world, and is gaining attention from individual consumers, national and multinational food retailers, industry associations, and governments, as well as public and private financial institutions in both developed and developing/emerging economies. Thus, paragraph 4(b) should specifically include animal welfare by adding a new bullet: “... (viii) risks associated with and impacts on the welfare of animals in animal husbandry.”

Page 11, para. 6: Further, notably absent from the framework of the policy is how to interpret and apply the standards when more than one apply to a specific project, which is surely all too common. Therefore, we suggest 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 tradeoffs. Such is the role of pursuing sustainable development.” Please note that the current paragraph 8 would need to reference this new paragraph in addition to paragraph 7.

Environmental and Social Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

Page 101, para. 39: We appreciate the progress in wording compared to the First Draft. However, 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 GIIIP alone is too ambiguous, the text should explicitly list the IFC’s GPN as the World Bank’s main document defining GIIIP in animal husbandry. Second, the paragraph shall apply to

1 Bold type indicates insertions; strikethrough indicates deletions.
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”). 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.

Conclusion

We sincerely hope that the World Bank follows other international lenders, investors, and corporations in promoting and protecting animal welfare. We believe this is essential to both reducing the suffering of the billions of animals raised for food, and to helping farmers and other food industry stakeholders in developing and emerging economies meet the demands of domestic and international markets.

Thank you for your consideration. Please do not hesitate to contact us with questions.

Kind regards,

Chetana Mirle, Ph.D.
Director, Farm Animal Welfare
cmirle@hsi.org
t 1-202-676-2368 f 202.676.2372

Humane Society International
2100 L Street NW Washington, DC 20037 USA
hsi.org