Based on feedback received since submitting our comments to the Phase 2 Consultation in November 2014, Humane Society International would like to make these additional comments:

**FIRST DRAFT FRAMEWORK FOR CONSULTATION (July 30, 2014)**

**World Bank Environmental and Social Policy (pp. 8 et seq.)**

The World Bank’s Environmental and Social Policy must begin with a definition of environmental and social risks and impacts. Borrowing from definitions employed by the Organization for Economic Co-operation and Development (OECD), the European Bank for Reconstruction and Development (EBRD), and the International Finance Corporation (IFC), we suggest the following introductory sentence:

“Environmental and social risks and impacts encompass all project effects on humans, wild living organisms, cultivated living organisms (e.g., through agriculture, animal husbandry, fisheries, forestry), and their non-living environment.”

The definition must further be expanded to include examples of specific environmental and social risks and impacts, including poor animal welfare. Animal welfare is the physical and psychological state of an animal. The way animals are raised and treated can have important repercussions on their welfare, as well as on biodiversity, ecosystem services, food security, and the economic well-being of farmers. There is a scientific basis for animal welfare concerns, and the welfare of animals should be considered in environmental and social risk assessments.

**Environmental and Social Standard 6. Biodiversity Conservation and Sustainable Management of Living Natural Resources (pp. 66 et seq.)**

As already noted in our November 2014 submission, “living natural resources” should be clearly defined to include animals raised for food/fiber, and the definition of “sustainable management” should include safeguarding and enhancing animal welfare.

**PROPOSED ESS1 – ANNEX 1. ENVIRONMENTAL AND SOCIAL ASSESSMENT (draft for consultation, October 7, 2014)**

**General**

The environmental and social assessment should include an assessment of impacts on animals. All animals – farmed animals, animals in laboratories, wildlife, animals used in entertainment, and companion animals – are potentially at risk from infrastructure and other development projects. In the case of projects in the animal agriculture sector, specific attention must be given to the welfare of animals during breeding, rearing, transport, and slaughter. The IFC’s Good Practice Note on Animal Welfare in Livestock Operations, and the EBRD’s Environmental and Social Policy both provide acceptable standards against which farm animal welfare can be assessed. Both policies are based on the Five Freedoms – a globally accepted framework for approaching animal welfare. The Five Freedoms are a logical way of thinking about the animal welfare problems that can occur in a wide variety of housing and management systems (from small-holder systems to large agribusiness facilities), and lay out the important needs of animals that should be addressed.
Indicative Outline of ESIA (pp. 7-8 et seq.)
Page 8, para. E(a)(v): As noted in our comments on the main draft text (Page 9, para.4(a)(v)) animal agriculture carries with it some of the largest environmental impacts around the globe. Therefore, it should be specifically included here to say: "(v) those related to the use of living natural resources, such as animal agriculture, fisheries and forests...."

PROPOSED ESS1 – ANNEX 2. ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (draft for consultation, October 7, 2014)

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
For livestock projects, the ESCP should, at minimum, require a qualified independent consultant to conduct animal welfare assessments and design appropriate mitigation measures where they fail to meet the accepted standards (IFC's GPN on Animal Welfare in Livestock Operations, the EBRD's ESP, or the Five Freedoms framework upon which those standards are based). Livestock projects oriented towards commercial production should aim for third-party auditing and/or certification for animal welfare.

ORIGINAL NOVEMBER 2104 SUBMISSION BELOW
World Bank Safeguard Policies: First Draft of Environmental and Social Framework

Phase 2 Consultation

Comments by Humane Society International

November 2014

As one of the world’s largest animal protection organizations working to protect all animals, Humane Society International believes the First Draft of the Environmental and Social Framework (30 July 2014) requires significant improvement in the area of animal welfare, particularly with regard to animals used in agriculture. 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.

Humane Society International’s farm animal welfare initiatives engage stakeholders at every stage in the supply chain for eggs, milk, and meat, including investors and financial institutions. In recent years, we have seen a number of financial institutions take clear and strong stances on issues relating to animal welfare. The European Bank for Reconstruction and Development’s Environmental and Social Policy requires that “[c]lients involved in the farming, transport and slaughtering of animals for meat or by-products (e.g. milk, eggs, wool) will adopt and implement national regulatory requirements, relevant EU animal welfare standards and [Good International Practice], whichever is most stringent, in animal husbandry techniques.”

Indeed, it is not possible to promote food security, or achieve humane or sustainable development in the livestock sector, without the full integration of animal welfare considerations. Therefore, we request that the Environmental and Social Framework incorporate current, progressive and comprehensive guidance on animal welfare rather than remaining largely silent on the issue.

Also, while we appreciate the emphasis on engagement with affected communities, we are concerned that the current formulation could leave multiple stakeholders by the wayside. In particular, we ask that, when the affected population is non-human (as in the case of livestock in animal agriculture operations), organizations that advocate on behalf of animals be included. This includes local, regional, and international organizations.

Our specific comments¹ to the document are the following:

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

Page 5, para. 5: In terms of focus for action, the current draft fails to indicate that positive outcomes are to be sought, not just negative impacts avoided or remedied. Additionally, impacts to non-human animals are left out. Therefore, page 5, paragraph 5, first bullet, should read: “Promote positive outcomes while avoiding or mitigating adverse impacts to people, animals, and the environment.”

¹ Bold type indicates insertions; strikethrough indicates deletions.

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Section “World Bank Environmental and Social Policy” (pp. 7 et seq.)

Page 8, 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 9, para. 4(a)(v): Animal agriculture carries with it some of the largest environmental impacts around the globe. 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 9, para. 4(b): Similarly, as shown above, animal welfare is not only an increasingly essential element around the world, this is particularly so for investments in agriculture. Thus, paragraph 4(b) should specifically include animal welfare by adding a new bullet: “(vii) risks associated with and impacts on the welfare of animals in animal husbandry.”

Page 10, 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

First, ESS6 is unclear as to which sector(s) it applies. “Living natural resources” is never defined but should be. In the case of animal husbandry, its inclusion in paragraph 27 implies that animals raised for food would be included in the definition. However, the vagueness is such that at least some projects may not trigger ESS6 and, therefore, ESS1, review even where they clearly should. Not triggering the standard is particularly significant for animal welfare, where there has been tremendous movement globally but much work remains to be done. So, farm animals should be included in a definition of “Living natural resources” and it should be made clear that animal welfare is part of ESS6 in the introduction, objectives, and assessment.

Page 72, para. 27: As written, ESS 6, paragraph 27, is nearly meaningless for the welfare of farmed animals. First, the current draft nests Good International Industry Practice (GIIP) into one paragraph of ESS6 and does not even mention animal welfare as an aspect of GIIP. This is far too ambiguous to even know whether animal welfare would be included. Yet, the World Bank Safeguards should absolutely promote and protect animal welfare, as other international finance institutions have done, with regard to global sustainable development.

Further, even if an ESS6 review would be triggered with respect to animal welfare, using the GIIP standard would be far too pliable and vague. It is clear based on global development of improved

\[\text{See, e.g., from the EBRD Environmental and Social Policy, page 44, note 2: “Living natural resources’ are defined as being ‘the plants and animals cultivated for human or animal consumption and use, whether in the wild or in a cultivated situation. It includes all types of forestry, biofuels, agriculture, including both annual and perennial crops and animal husbandry, including livestock; and both wild and capture fisheries including all types of marine and freshwater organisms, both vertebrate and invertebrate.”}\]

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animal welfare laws, standards, and practices globally—including those directly related to global development investment—that the draft ESS6 is far from living up to the aspirational and positive influence of a development institution (as set out in the section “A Vision for Sustainable Development”). Therefore, we suggest the following:

Borrowers involved in the farming, transport, and slaughter of animals for meat or by-other animal products (such as milk, eggs, wool) will exceed national regulatory requirements and should employ best internationally available animal husbandry techniques, with due consideration for religious and cultural principles. This includes all standards and practices related to animal welfare.

Environmental and Social Standard 10: Information Disclosure and Stakeholder Engagement

Page 93, footnote 1: While we appreciate that civil society is included in the stakeholder engagement process, it is concerning that the outer limit of outreach is at the national level. There should be some onus on the Borrower to include relevant, interested international organizations, through specific outreach, public information, or otherwise in the stakeholder process. Therefore, we suggest the footnote read: “Other stakeholders are those not directly affected by the project but that have an interest in it. These could include international, national and local authorities, neighboring projects, or nongovernmental organizations.”

Additionally, to avoid any ambiguity, there should be an annex that describes, in general, what type of projects trigger inclusion of which stakeholders. As stated above, this should include that, “When the affected population is non-human (as in the case of livestock in animal agriculture operations), organizations that advocate on behalf of animals will be included. This includes local, regional, and international organizations.”

Conclusion

We sincerely hope that the World Bank follows other international lenders and investors in promoting and protecting animal welfare in its projects, and believe that inclusion in the Environmental and Social Framework is essential for this goal, as well as for the Bank to pursue its sustainable development goals.

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

Kind regards,

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