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

Comments by World Animal Net

Information on World Animal Net

World Animal Net (WAN) is the world's largest network of animal protection societies with over 3,000 affiliates in more than 100 countries and Consultative Status at the United Nations. We actively represent the interests of animals at international and regional levels, and support our affiliates in doing likewise at national and local levels. There is more about us and our international policy work on our website (see: http://worldanimal.net/about and http://worldanimal.net/our-programs/international-policy).

General Comments

WAN believes that the Second Draft of the Environmental and Social Framework (July 2015) is still seriously lacking in regard to animal welfare and the protection of animals.

Our position, briefly explained, is that the mainstreaming of animal welfare and human-animal relationships in development policy and practice is long overdue. This is despite the fact that there is a myriad of reasons why no country’s development should take place without giving full consideration to the situation and welfare needs of the sentient fellow animals sharing our territory, our homes, our work, our livelihoods, our leisure, and often our lives. In addition to the more ethical and altruistic concern for the well-being of animals, there are many human-centric arguments for including animals and their welfare in development. Animal welfare is inextricably linked to animal health, which is clearly important in many development programs. Moreover, there are many additional benefits to including animal welfare in relevant development programs, and these positively impact many key areas of development concern, such as:

- Poverty reduction;
- Agriculture/livestock/fisheries and rural development;
- Sustainable livelihoods;
- Health/safety (including food safety and security);
- Biodiversity/environment; and
- Disaster/emergency response work.

These issues are examined in greater detail in our research listed below.

Our website also contains significant research and analysis on the subject of animal welfare and development, including:

- An overview of animal welfare and development.
- A WAN blog on animal welfare and development.
- A WAN blog on livestock development.
There are now a number of international policy frameworks covering animal welfare, with multilateral agencies, financial institutions and multinational companies adopting animal welfare policies and standards. The World Bank Group itself has already given consideration to animal welfare and development in the form of the International Finance Corporation (IFC)’s Good Practice Note on “Improving Animal Welfare in Livestock Operations” in 2006, which was revised in 2014. However, there are other animal welfare issues which can be affected by the World Bank Group’s policies and programs, and a growing international and regional policy environment; and these also need due consideration.

Most importantly, animal welfare policy developments include a growing body of World Organisation for Animal Health (OIE) international animal welfare standards and Regional Animal Welfare Strategies (RAWS) - which now need to be implemented in developing countries, as well as in the rest of the world. Indeed, Africa is now the only region of the world not yet covered by a RAWS. However, progress is now also being made on the continent, with a Continental Consultative Stakeholders Conference on Animal Welfare (AW) having taken place at the African Union Inter-African Bureau for Animal Resources (AU-IBAR) in Nairobi, Kenya on 30th November to 1st December 2015. The conference recommended the establishment of an African Platform on Animal Welfare, along with a string of other recommendations including (amongst others): the establishment of national and regional animal welfare networks; Regional Economic Communities and countries to ratify a Universal Declaration on Animal Welfare and national and regional livestock policy hubs to mainstream animal welfare at national and regional levels.

Not only is there now increased political awareness and acceptance of the need for improved animal welfare in developing countries and Regional Economic Communities, but we have now reached the stage where animal welfare needs to be included in national and regional development planning. It is vital that the World Bank’s policies and programs, including its Environmental and Social Framework, reflect the need to support and contribute to these beneficial developments. It is also vital that none of the programs funded by the World Bank Group adversely affect the lives and welfare of animals, or the agreed OIE animal welfare guidelines and international standards.

We are therefore asking the World Bank to incorporate stronger language on animal welfare into the final draft of the Safeguards Policy. This should make provision both for the promotion of positive outcomes for animal welfare and a system of animal welfare impact assessment to guard against any potential detrimental impacts. It should also specifically take into account the existing IFC Good Practice Note on “Improving Animal Welfare in Livestock Operations”, and be extended to incorporate other animal welfare issues (beyond livestock), the growing international and regional animal welfare policy environment, and internationally-agreed animal welfare definitions, principles and assessments. Furthermore, whenever environmental and social needs are mentioned, the Safeguards Policy needs to additionally specify animal welfare.

Specific Comments

A Vision for Sustainable Development

Page 6: Para 5
We suggest that outcomes for, and impacts on, non-human animals need to be specified for avoidance of doubt, e.g.

- Promote positive outcomes and avoid or mitigate adverse impacts - for people, animals and the environment;
Impact assessments should be extended to include impact on animal welfare. Also, project monitoring should incorporate an assessment of positive and negative animal welfare impacts (with immediate action taken in the case of any negative impacts).

An additional Environmental and Social Standard is needed to cover animal welfare.

C. Environmental and Social Due Diligence

Environmental and social due diligence checks should also encompass animal welfare aspects.

Projects Involving Financial Intermediaries (FI) as Borrowers

As above, animal welfare needs to be included.

E Environmental and Social Commitment Plan (ESCP)

As above, animal welfare needs to be included.

Environmental and Social Standard 1. Assessment and Management of Environmental and Social Risks and Impacts

As above, animal welfare needs to be included throughout this section. This includes references to animal welfare in provisions such as the following on Page 24 (needed because there are national policy and regulatory frameworks covering animal welfare):

- To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate.

However, as many developing and transition countries currently have inadequate or non-existent national animal welfare policy and regulatory systems, it is vital that international and regional animal welfare policies, standards and agreements are also taken into account; as well as animal welfare science. It will take time for some of these countries to update their national policy and regulatory systems to reflect these new developments, but project assessment must already reflect the current state of knowledge and the international and regional situation.

ESS1 – Annex 1. Environmental and Social Assessment

These should include an animal welfare impact assessment, where there are any potential impacts.
Environmental and Social Standard 3. Resource Efficiency and Pollution Prevention and Management

Page 58 onwards:
Air, water and land pollution from waste products from industrial livestock farming should be included here, as these bring threats to human health and the environment. These include the leaching of microbes, nitrate pollution and drug-resistant bacteria into water supplies. Farm waste lagoons also emit toxic gases such as ammonia, hydrogen sulfide and methane. See: http://www.nrdc.org/water/pollution/nspills.asp
In addition to causing widespread environmental and human health problems, industrial animal agriculture is inefficient as regards resource utilization; brings import and technology dependence and hidden costs; can push smallholders (including women farmers) out of the market and reduce income opportunities for the rural poor; and exacerbate food insecurity. See:http://www.worldanimalprotection.ca/sites/default/files/ca-_en_files/wspa_poverty_report_tcm22-3744.pdf
Livestock impacts upon climate change should also be included. The World Bank is already well aware of this issue. Indeed, we note that the World Watch paper entitled "Livestock and Climate Change" (http://www.worldwatch.org/files/pdf/Livestock%20and%20Climate%20Change.pdf) had as authors Robert Goodland (retired lead environmental adviser at the World Bank Group) and Jeff Anhang (research officer and environmental specialist at the World Bank Group’s International Finance Corporation). The FAO estimates that the livestock sector is responsible for 14.5% of human-induced greenhouse gas (GHG) emissions. However, as noted by Goodland and Anhang, the percentage is much more when the whole lifecycle and supply chain of livestock products is factored in – at least 51% of annual worldwide GHG emissions.

We also noted that the World Bank includes as a resource a presentation entitled “Livestock, climate change and resource use: present and future” (http://siteresources.worldbank.org/INTARD/Resources/335807-1334000183672/Jarvis-livestockandclimatechange.pdf) which deals with the issue of meat consumption and climate change in the developing world. It is vital that this issue is included and full consideration given to the impact of any measures to increase livestock production, as opposed to more climate-friendly food alternatives. See also: https://www.facebook.com/UNFAO/videos/10153955757413586/?permPage=1

Environmental and Social Standard 4. Community Health and Safety

Page 64 onwards:
The aspects above apply as regards pollution.
Another important aspect which should be included is the use of antimicrobials in livestock and fish farming, and their contribution to antimicrobial resistance.

The WHO has stressed that over-reliance on antimicrobials in intensive livestock farming is a significant contributor to the emergence of antimicrobial-resistant bacteria that affect human health. Another often forgotten contributor is aquaculture, which is an intensive user of antimicrobial agents – several of which are classified by the WHO as critically important for use in humans. The Oxford Journal published an interesting paper on this issue entitled “Human Health Consequences of Use of Antimicrobial Agents in Aquaculture” (see: http://cid.oxfordjournals.org/content/49/8/1248.long).
Here again, the World Bank is already aware of this problem – as evidenced in its blog “Antimicrobial Resistance: A new global public health “ticking bomb?”
This aspect should be included.

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

Page 94 onwards:
We do not feel that this section is sufficient to address and encompass animal welfare concerns. In the regard, please see our proposal for a new ESS below.

As regards the existing draft provisions:
Page 102, Para 39:
We agree with calls from our colleagues, HSI and PAAWA, for this paragraph to be tightened up by explicit mention of the IFC’s Good Practice Note, and that its application should be extended to cover all commercial animal farming operations, irrespective of their size and all stages in animal production with implications for animal welfare.

Proposed New Environmental and Social Standard: Animal Welfare

Our preference would be for a separate section specifically designed to address animal welfare. Our rationale for this request is that, in essence, biodiversity and ecosystems are about complex terrestrial, marine and other aquatic systems – whereas animal welfare is about individual animals and their well-being. Thus the two differ in both general principles and practical application. Animal welfare has its own agreed principles and standards; and will need very different measurements/impact assessments and expertise. It is also, as previously explained, the subject of a whole new and growing policy stream, which must be taken into account.

We request the inclusion of agreed animal welfare principles to cover all areas of animal welfare. In addition to livestock, which are already included on the IFC’s Good Practice Note on improving Animal Welfare in Livestock Operations, this would include any areas where funding had the potential to adversely impact on animal welfare (which could include areas as diverse as road and infrastructure projects, land-use and waterway changes, wildlife programs and aquaculture development).

World Animal Net’s newly released Model Animal Welfare Act includes definitions and assessment criteria for animal welfare, as well as an overview of international policy changes in this sphere. See: http://worldanimal.net/contents and http://worldanimal.net/a-broad-overview/54-our-programs/model-animal-welfare-act/456-i-introduction
These include the internationally accepted Five Freedoms, and 12 criteria for the assessment of animal welfare have been identified by the Welfare Quality Project (WQP), a research partnership of scientists from Europe and Latin America funded by the European Commission. The WQP aims to develop a standardized system for assessing animal welfare.

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