Committee for Development Effectiveness (CODE) of the World Bank's Board of Executive Directors

World Bank Safeguards Policies: Second Draft of Environmental and Social Framework
Phase 3 Consultations

Animal Friends Jogja [AFJ], a registered non-profit organization (No: 45/2010.08.16) based in Yogyakarta, Indonesia and a league member of OIPA / Organizzazione Internazionale per la Protezione degli Animali (International Organization for Animal Protection Associated with the United Nations Department of Public Information), is committed to improving the welfare of animals and creating a compassionate world where animals are treated humanely. AFJ acts by conducting proactive education programs, advertising campaigns, lobbying, advocacy, rescues, grassroots activism, and collaborates/networks with related organizations. AFJ's aims are to promote the protection of animals, to prevent cruelty and to relieve animal suffering.

As we are expanding our work to include farm animal welfare, we appreciate that the issue of animal welfare has been included within the latest draft of the WBG Safeguard Policies. This will definitely impact positively on the lives of many animals. However, in order to better protect farm animals in the ever expanding animal agriculture sector within the Asian region and as discussed in the WB's internal documents that state: “Animals that are healthy, well-rested, and handled in a way as to prevent stress yields products of greater quality; using practices that prevent and control disease helps animal welfare and is economically beneficial”, we respectfully request the following:

1) All investments and projects that involve the use of animals for food, irrespective of their size, must follow basic animal welfare standards—in particular the Five Freedoms for Farm Animal Welfare.
2) The term “animal welfare” must be explicitly mentioned within the text of the Safeguards Policy.
3) The Five Freedoms for Farm Animal Welfare must be explicitly mentioned within the text of the Safeguards Policy.

The Government of Indonesia has already adopted animal welfare legislation as stated in Law No. 6 of 1967 Concerning Basic Provisions on Husbandry and Animal Health, Article 22 – Animal Welfare; Law No. 18 of 2009 Concerning Husbandry, and Animal Health Article 66-67 – Animal Welfare. In 2012 during the 7th Indo Livestock Expo & Forum, Indonesian Veterinary Medical Association and Indonesian Animal Husbandry Scholar Bond decreed the Indonesian Farm Animal Welfare Society/Indofast (link: http://www.livestockreview.com/dideklarasikan-masyarakat-kesejahteraan-hewan-ternak-indonesia-indofast/). The Directorate General of Livestock and Veterinary Health Services also published an article on the importance of communication, information, and education in raising awareness on animal welfare on...
Information published from these government sectors indicates that there is positive support from government and business stakeholders to apply animal welfare standards and Five Freedoms in the farm animal industry in Indonesia. Furthermore, the explicit inclusion of the three stipulations above within World Bank Safeguard Policies will ensure that the implementation of animal welfare principles and practices within the livestock industry in Indonesia will be more rigidly adhered to.

World Bank Policy sets the standard for all public sector lending and investments around the world (particularly in Asia, Africa, and Latin America) and with animal agriculture expanding in the region, there is going to be significant public sector investment in meat, egg, and milk production.

Indonesia needs safeguards in place to protect the farm animals utilized for this purpose. A proposed non-binding guidance note that countries and livestock projects have the option of following if they wish will have little impact in Indonesia and is not an acceptable alternative. Animals deserve to have their welfare explicitly acknowledged and addressed within the binding Safeguards Policy document. A World Bank safeguard policy that explicitly states that animal welfare must be the basic standard for all livestock handling will ensure that both government and non-government agencies for monitoring livestock utilization will be more empowered to act in transforming the industry to one that is humane yet still beneficial in terms of health, trade and finance.

Animal welfare is also mandatory to ensure that foreign trade in livestock and animal product as evidenced by the furore after livestock abuse in the live animal import/export industry to Indonesia from Australia was disclosed. Evidence showed that abuse by animal handlers at the transportation stage.

“Animal handler competency was considered to be the greatest factor potentially impacting animal welfare during transport due to the number of individuals involved in the transport process and the lack of operating guidelines and enforceable standards.” (http://www.thebeefsite.com/articles/2686/indonesia-australia-live-cattle-export-transport/#sthash.6JyH7EDB.dpuf )

Subsequent bans in livestock trade between Australia and Indonesia led to changes to a more humane approach. (https://www.adelaide.edu.au/indo-pacific-governance/policy/Risti_Permani.pdf). Global and domestic markets will ban / close for products produced without basic animal welfare standards – farmers who do not adapt will be at a disadvantage. Ultimately, all producers of animal products, from the smallholder farmer to the large agribusiness conglomerate, will benefit from a transition to more humane methods of farming. Explicit World Bank regulations are a significant step in the attainment of improved standards of animal welfare in the Indonesian livestock industry.

Furthermore, claims that any inclusion of animal welfare standards in the Safeguards will harm small farmers are simply not true. Improved animal welfare practices will in fact improve the prospects for small scale farmers whose products are generally priced higher than the larger conglomerates that utilize chemicals in feed, supplements that artificially increase weight leading to decreased production times hence cheaper prices. In addition, the cruelty of cramped living spaces, inhumane handling and slaughter methods
and their health implications for consumers, intensive livestock farming also creates a pricing disparity in the community. When the large scale, high profit livestock farms, that utilizing inhumane and non organic / imported feed are made to comply with humane farming practices, prices will stabilize and smaller grassroots free range farmers and the organic locally grown feed suppliers will have a larger share of the market, thus create more opportunities for micro businesses in marginalized and remote communities.

In Indonesia, despite the higher prices on organic and humanely farmed livestock products, there are many small farmers running free range and organic chicken farms, and other livestock industries that are able to sustain profitable businesses while incorporating animal welfare methods for utilizing animals in business. The increasing demand for free range chickens, eggs and other animal products such as cheese, yoghurt and dairy at both national supermarket chains and the more traditional markets and gourmet food stores shows that consumers will choose these products if they are available despite the higher prices. Moreover, operations that practice good animal welfare require a larger workforce, which provides additional potential for economic growth/ more income earning opportunities for vulnerable and remote groups. With sufficient public education campaigns and support in the promotion of animal welfare standards in farming, and the health benefits to the consumer, there is great potential to give these small scale farmer enterprises a market advantage.

Explicit inclusion in the World Bank Safeguard Policies of the three welfare stipulations stated above will drive the Indonesian livestock industry to implement global welfare standards and promote improved global trade opportunities, increased business opportunities for the grass roots population, and a healthier, more humane population.

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

Kind Regards,

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