

**Comments on the World Bank Guidance Note for ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources**

*Prepared by World Animal Net*

World Animal Net welcomes the inclusion and consideration of animal husbandry, including large-scale commercial farming, breeding, rearing, housing, transport and slaughter, aquaculture and industrial-scale harvesting of wild fish populations and other marine and freshwater organisms in the World Bank Guidance Note for ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.

However, we believe that there are some inclusions that will help ESS6 fulfil the intent of the document more fully and better assist Borrowers in the Guidance Note’s implementation.

**Specific Suggestions**

* Paragraph 35 (c) addressing the sustainability of fish harvesting should include a reference to the need to conform to GIIP.
* Paragraph 37 should make reference to aquaculture in addition to husbandry of terrestrial animals. Aquaculture is indeed included in Footnote 2 which defines “Primary production of living natural resources,” and there is a body of GIIP regarding welfare of aquatic animals in the World Organisation for Animal Health (OIE) Aquatic Code (n.b. the Aquatic Code and the need for consideration of animal welfare in aquaculture is included in the IFC Good Practice Note on Improving Animal Welfare in Livestock Operations). We suggest adjusting the wording here to read, “The Borrower involved in large-scale commercial farming, including breeding, rearing, housing, transport, and slaughter, of *terrestrial and aquatic* animals for meat or other animal products (such as milk, eggs, wool) will employ GIIP 19 in animal husbandry techniques…”
* Because Borrowers may not be familiar with the contents of the IFC Good Practice Note on Improving Animal Welfare in Livestock Operations, we suggest, for the sake of clarity, that Footnote 19 reference both the OIE Animal Welfare Standards and the IFC Good Practice Note on Improving Animal Welfare in Livestock Operations.
* We endorse the comments made by Compassion in World Farming and agree that the Guidance Note should outline the key considerations of animal welfare which are included in the IFC Good Practice Note in order to better advise Borrowers.

**General Comments**Developments in Animal Welfare GIIP
World Animal Net notes that GIIP, particularly as it pertains to animal welfare, aquaculture and wild-capture fisheries is rapidly evolving. The OIE is constantly revising and drafting new animal welfare considerations in its code to keep up with the field of animal science which is quickly uncovering ways to reduce harm and improve animal welfare in production systems. Therefore paragraph 37 could emphasize this fact by stating that Borrowers should conduct periodic review of GIIP to ensure up-to-date compliance.

Ethical Imperatives in Animal Use
World Animal Net would like to highlight that animal sentience, consciousness, and ability to experience fear, suffering, distress and states of well-being is scientifically validated and therefore the use of both terrestrial and aquatic animals carries with it an ethical and moral imperative.

The OIE Global Animal Welfare Strategy states that animal use carries “an associated ethical responsibility to ensure any such use is humane, as defined through the OIE’s international standards for animal welfare, in *recognition of the sentience of animals*” (emphasis added).

Further, OIE Article 7.1.2 “Guiding Principles for Animal Welfare” of the Terrestrial Code and Article 7.1.1 “Guiding Principles” of the Aquatic Code states “That the use of animals carries with it an ethical responsibility to ensure the welfare of such animals,” and “The use of fish carries with it an ethical responsibility to ensure the welfare of such animals,” respectively.

Since the OIE’s standards form the baseline for GIIP and are endorsed in the IFC’s Good Practice Note on Improving Animal Welfare in Livestock Operations we feel there is sufficient rational for ESS6 to explicitly mention this point.

We suggest the following wording:

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| 1. *The Borrower involved in the industrial production of crops and animal husbandry will follow GIIP to avoid or minimize adverse risks or impacts. The use of sentient terrestrial and aquatic animals carries an ethical responsibility to ensure the welfare of such animals. The Borrower involved in large-scale commercial farming, including breeding, rearing, housing, transport, and slaughter, of terrestrial and aquatic animals for meat or other animal products (such as milk, eggs, wool) will employ GIIP 19 in animal husbandry techniques, with due consideration for religious and cultural principles. Further, GIIP pertaining to animal welfare is constantly evolving and Borrowers shall demonstrate periodic review to ensure compliance to current GIIP.*
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| 1. *Footnote 19. Such as the World Organisation for Animal Health standards for animal welfare and the IFC Good Practice Note on Improving Animal Welfare in Livestock Operations.*
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