

12th January, 2017

The Inspection Panel
1818 H Street, NW
Washington, DC 20433 USA

We, [REDACTED] office in Vietnam and [REDACTED], acting on behalf of the animals and the animal welfare organizations impacted by two World Bank projects: the [Vietnam Livestock Competitiveness and Food Safety Project](#) (revised closing date 31-12-2018) and [Additional Financing for Livestock Competitiveness and Food Safety Project](#) (hereinafter jointly called “Project”), present this request for inspection.

By neglecting to provide adequate training on farm animal welfare, the Project has not only failed to safeguard animal welfare, it has undermined the voices of groups working to improve the welfare of poultry and pigs in Vietnam. For example, [REDACTED] has invested nearly \$50,000 USD in Vietnam to improve farm animal welfare over the past two years -- including by helping the Vietnam National University of Agriculture convert its sow barn to a group housing facility. [REDACTED] and local animal protection groups have also volunteered time and contributed significant resources to this effort. However, the Bank has more influence and power with the government and livestock sector in Vietnam than any animal protection group – the budget of this Project alone (US\$ 123.71 million) far exceeds the funding any local or international animal protection group is able to bring into the country. By failing to encourage or provide training on higher welfare housing systems within the context of a massive livestock project, the Bank effectively undermines what animal protection groups are saying about the importance of animal welfare.

1) Following are the failures or omissions that we believe are the responsibility of the Bank:

i) Stakeholder engagement has been inadequate. While both [REDACTED] have invested resources in promoting higher animal welfare standards in Vietnam’s livestock sector, specifically cage-free housing systems for hens and group housing systems for sows, neither group (nor any other animal welfare organization working within Vietnam) were consulted about this project.

ii) The Bank’s response to stakeholders’ queries about the project is inadequate and unacceptable. In response to our concerns about animal welfare, the Director of the World Bank in Vietnam stated that “the scale of the issue within the scope of the project is minimal” (attachment 1). This is despite the fact that more than US\$ 123 million have been committed to the Project, which by its very nature of being a livestock project, relies on the breeding, rearing, and slaughter of animals (all of which come with significant welfare issues). The Bank has also failed to comply with our request to see any materials used to train producers on animal welfare as part of the Project’s Good Animal Husbandry Practices (GAHP) component.

2) We fear that these failures and omissions shall result in the following damage or harm:

- i) Vietnam houses the fourth largest population of pigs in the world, and is one of the largest egg and poultry meat producers in Asia. Large-scale, medium-scale and even some small-scale producers in Vietnam house animals in restrictive battery cages and sow stalls. The intensive confinement of these production systems severely impairs the animals' welfare, as they are unable to exercise, fully extend their limbs, or engage in many important natural behaviors. As a result of the severe restriction within barren housing systems, animals can experience significant and prolonged physical and psychological assaults. Indeed, [extensive scientific evidence](#) shows that intensively confined farm animals are frustrated, distressed, and suffering. Further, the IFC's GPN on animal welfare, by referencing the Five Freedoms of Farm Animal Welfare, clearly prohibits such confinement systems. Specific examples are provided in table 1.

Table 1: Examples of Specific Project Activities where significant animal suffering could result if animal welfare safeguards are not in place:

Project Activity	Welfare risks specifically associated with project activity	Other serious welfare problems, which Project failed to address through animal welfare training	Source with References
Increase the Production Efficiency of Household-based Livestock Producers through Livestock (poultry) fattening times shortened	Selection for rapid growth is a severe welfare problem as it can result in poor bone health, leg disorders including deformities, lameness, tibial dyschondroplasia, and ruptured tendons, and has been correlated with metabolic disorders such as ascites and sudden death syndrome. Broiler chickens selected for faster growth also suffer from weakened immune systems, making them more susceptible to a variety of additional diseases.	Broiler breeders, the parent birds of chickens raised for meat, are subjected to severe feed restriction, and males may undergo painful toe and beak amputations, performed without pain relief.	
Increase the Production Efficiency of Household-based Livestock	Overcrowded in indoor, barren environments, pigs in commercial production facilities are offered little opportunity	Pregnant sows are commonly confined to gestation crates, small cages that typically measure 0.6 m wide by 2.13 m long. Gestation crates restrict	

<p>Producers through Herd/flock (pigs) numbers increased</p>	<p>to display their full range of complex social, foraging, and exploratory behavior. Behavioral abnormalities, such as tail-biting and aggression, arise due to environmental and social deficiencies. Poor air quality and intensive confinement may lead to health problems, and the lack of individualized attention to each animal compromises their care. Handling and transport for slaughter are highly stressful procedures, and some pigs become so fatigued, injured, or sick that they become nonambulatory, unable to stand and walk on their own accord.</p>	<p>normal postural adjustments and are so narrow that they prevent the sow from even turning around.</p> <p>Restriction of movement can lead to a reduction in muscle weight and bone strength. These restricted animals also have higher basal heart rates,, can experience soreness and injuries from rubbing against the bars of their enclosures and from standing or lying on barren flooring, and have a higher rate of urinary tract infections due to their inactivity, decreased water consumption, and infrequency of urination.</p> <p>Crated sows also suffer from psychological problems, as evidenced by abnormal behavior. Common stereotypies of crated sows include bar-biting (on the crate that confines them) and sham-chewing (with nothing in their mouth). In addition, crated sows tend to become unresponsive over time, a behavioral disorder scientists have linked to depression.</p>	
<p>Increase the Production Efficiency of Household-based Livestock Producers through Herd/flock (poultry) numbers increased</p>	<p>In commercial systems without adequate welfare safeguards, broiler chickens may experience crowded indoor confinement, unnatural lighting regimes, poor air quality, and stressful handling and transportation.</p>		<p>██████████ ██████████ ██████████</p>
<p>Supporting Commercial Egg Production (Please</p>		<p>Hens are confined in battery cages, enclosures so small that the birds are unable</p>	<p>██████████ ██████████ ██████████</p>

<p>see attachment 2 for photos)</p>		<p>even to spread their wings without touching the cage sides or other hens. Battery cages prevent nearly all normal behavior, including nesting, perching, and dustbathing, all of which are critically important to the hen, as well as deny the birds normal movement to such an extent that the hens may suffer from physical ailments, including osteoporosis and reproductive and liver problems. The females are typically beak-trimmed, usually with a hot blade, to prevent them from developing the abnormal pecking behaviors that manifest in substandard environments. Once their productivity wanes, typically after 1-2 years, the hens are “depopulated,” and many experience broken bones as they are removed from the cages.</p>	
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- i) Both global and regional markets are poised to close for products produced without basic animal welfare standards. An expanding number of multinational food companies are phasing out the use of battery cages, sow stalls and other abusive practices from their supply chains for eggs, meat and milk. Throughout the world, governments – including in Asia, Latin America and Africa – have already adopted, or are considering adopting, farm animal welfare legislation in response to public concerns. These trends and the need for producers to heed them is well noted within the IFC’s GPN on Animal Welfare. By failing to provide training or information on these trends towards higher welfare housing system through the Project, the Bank fails to help Vietnamese egg, meat, and milk producers adapt to changing market demands – indeed the omission hinders progress by making it appear as if such trends do not exist.
- ii) For reasons stated above, the Project undermines the efforts of Vietnamese animal protection advocates working to improve the welfare of poultry and pigs in the country’s egg and meat industry.

3. We make this request on behalf of the animals and animal welfare advocates impacted by the [Vietnam Livestock Competitiveness and Food Safety Project](#).

4. These concerns have been raised with the Bank staff in Vietnam by [REDACTED] [REDACTED] staff in the country, on behalf of other animal protection advocates. A copy of all correspondence is contained in attachment 1.

The World Bank's [Safeguard Policies](#) now specifically reference the [International Finance Corporation's Good Practice Note on Animal Welfare](#). Therefore ensuring the welfare of farm animals in accordance with the GPN is a requirement of all projects in the livestock sector.

We believe that the above actions and omissions which are contrary to the Banks policies or procedures have materially and adversely affected the welfare of the animals on whose behalf we present this request, and have undermined the efforts of animal protection advocates in Vietnam who are working to promote higher animal welfare standards in the livestock sector. These omissions have also hindered progress in Vietnam's livestock sector (which adversely impacts farmers). We therefore ask for a fair and rapid treatment of the present concerns by the Inspection Panel.

We have made this Request for Inspection briefly in accordance with your Operating Procedures. We are however able to provide you with more particulars on request.

Yours Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ATTACHMENT 1: Correspondence with World Bank Director, Vietnam

[REDACTED]
To: Ousmane Dione

Subject: Re: Response to your email

Dear Mr. Dione,

I appreciate your prompt response and well-wishes.

[REDACTED] and other animal protection groups are investing significant resources in promoting higher animal welfare standards in Vietnam and throughout the region [REDACTED] has led training workshops and even funded a model pig facility at the Vietnam National University of Agriculture. Attached are some of the standards being promoted by [REDACTED]. We would like to see the Banks' training materials for the Vietnam Livestock project to ensure that we are not working at cross-purposes. Thank you in advance and have a Happy New Year ahead.

Sincerely,

From: Ousmane Dione <odione@worldbank.org>

[REDACTED]
[REDACTED]
Subject: Response to your email

Dear [REDACTED]

Many thanks for your email and the enclosed inquiry. Please find below some clarification to the issue you raised in your email.

- The project is not financing any production facilities (stabling or housing per se) and thus has few leverage on their design and / or operation. It focuses on public good aspects of livestock operations: bio-security, environmental preservation and food safety.
- But the project is an incremental step in improving awareness on a number of issues, including animal welfare, as it promotes "Good Animal Husbandry Practices" (GAHP now included in VietGAP) and complies with standards or technical guidance when they exist.
- And finally that the scale of the issue within the scope of the project is minimal and that we will continue our efforts to ensure that it remains as such and that animal welfare aspects are promoted.

I appreciate your care about this important issue and thank you very much for reaching the world bank.

Wishing you a merry Christmas.

Ousmane

To: odione@worldbank.org

Subject: Concerns about additional Financing for Livestock Competitiveness and Food Safety Project

Mr. Dione,

I am writing to follow up on my earlier email of November 30th. Please see below. I would very much appreciate a response. As I mentioned in this earlier email, [REDACTED] other animal protection groups in Vietnam have been working to phase out the extreme confinement of farm animals in cages/crates. Allowing the use of battery cage systems for egg laying hens as part of the Livestock Competitiveness and Food Safety Project in Vietnam undermines our efforts to modernize the livestock sector and promote more humane practices in our country. What assurances can you provide that this will be corrected through the additional funding being provided through this project, bringing it in line with the IFC's Good Practice Note on Animal Welfare, which is also now part of the World Bank's Safeguards Policy?

Again, HSI is happy to collaborate and support the Bank's efforts to promote animal welfare in Vietnam. Please let me know if we can meet to discuss further.

I look forward to your response.

Kind regards,

Subject: Concerns about additional Financing for Livestock Competitiveness and Food Safety Project

Dear Mr. Dione,

I am writing on behalf of [REDACTED] Our farm animal protection programs focus on helping egg and meat farmers move towards more modern, higher welfare production systems— specifically cage-free housing systems for egg laying hens and group housing systems for sows. We have funded a number of research and education projects in Vietnam to this end.

This is why we were particularly concerned to learn from [this article](#) on the World Bank website (pdf also attached), that the World Bank allowed, if not promoted, the use of battery cage systems for egg laying hens as part of the Livestock Competitiveness and Food Safety Project in Vietnam. As funding to this project is continuing ([Additional Financing for Livestock Competitiveness and Food Safety Project](#) approved in June 2015), we seek assurance that all livestock projects will conform to the IFC's [Good Practice Note on Animal Welfare](#), which is now referenced within the World Bank's updated [Safeguards Policy](#). The GPN clearly discourages the use of extreme confinement systems such as battery cages.

Animal welfare is an issue of growing importance globally, including in developing and emerging economies, where major food companies, industry associations, and governments are discouraging or outright restricting the use of battery cages, gestation crates/sow stalls, and other cruel and outdated housing systems. The World Bank group should also play a leadership role in propagating more modern and higher welfare housing systems through its programs. HSI is happy to work with you to this end.

Please let me know if we can meet before the end of the year to discuss how animal welfare, a critical component of GAHP and food safety, can be better integrated into the World Bank Livestock and Food Safety program in Vietnam. In the meantime, here is a link to a very relevant paper on [food safety and animal welfare](#).

I look forward to your response.

Kind regards,



ATTACHMENT 2: World Bank Documentation, including photos of battery cages



(<http://www.worldbank.org/>)

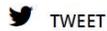
Projects & Operations (<http://www.worldbank.org/projects>)

Vietnam: Better Food Safety and Production Efficiency with Good Animal Husbandry Practices

April 14, 2016

This page in: English |

Tiếng Việt (<http://www.worldbank.org/vi/results/2016/04/14/vietnam-better-food-safety-and-production-efficiency-with-good-animal-husbandry-practices>)



TWEET



SHARE



SHARE



Two farmers received training and support on Good Animal Husbandry Practices under the Livestock Competitiveness and Food Safety Project.

Between 2010 and 2015, the Livestock Competitiveness and Food Safety Project introduced Good Animal Husbandry Practices (GAHP) to small holders of livestock production. As a result of improved bio-security measures and upgrades to slaughterhouses and sanitation in wet markets, the Project has contributed to significant improvements in production efficiency, competitiveness, and food safety along the food value chains for pork and poultry.

Challenge

Pig and poultry farming at household level in Vietnam has faced a number of challenges. Key issues include low investments, small herds/ flocks, low inputs, poor quality animals, and high levels of disease and mortality. These issues, combined with limited access to markets and high risks, have led to low turnover and returns.

Meanwhile, slaughterhouses have suffered from inadequate investment, and in their management, there has been little concern for waste management, hygiene, and safety. Slaughterhouses have also been characterized by low throughput and productivity.

Fresh meat markets are often of low quality, with inadequate facilities. Meanwhile, urban food markets possess little space, limited ventilation, poor hygiene services (such as display tables, water and electricity supplies), inadequate waste disposal, and poor access for buyers.

Approach

The Project adopted a comprehensive food chain approach spanning “farm to table” or “producer to consumer” and addressed interrelated issues of livestock competitiveness, food safety, and environmental sustainability in an integrated way.

The Project promoted the use of Good Animal Husbandry Practices (GAHPs) in existing livestock production areas, through training of farmers, extension officers, and animal production and veterinary staff in the application of GAHPs, including feed conversion technology and proactive disease control measurements. It also helped form producer groups that would have better negotiation power to reduce the feed cost and improve access to markets; provided equipment and goods to strengthen provincial and district level livestock services delivery, including animal disease control and surveillance; and supported waste management and bio-security investments at the farm level.

Under the Project, Livestock Planning Zones were piloted, aiming to increase competitiveness and safety, while slaughterhouses and meat markets were upgraded to support the establishment of processing and markets linkages with household producers.

The project also supported the capacity building to the technical departments of Animal Husbandry and Livestock Development in MARD for improved policy making processes, strengthened assistance to provinces in inspection, surveillance and monitoring for animal diseases and epidemic.



Under the project, 100 percent of pigs and hens were vaccinated and disease prevention activities were regularly taken at farm and livestock production area.

LIFSAP

Results

The adoption of Good Animal Husbandry Practices (GAHPs) has proven effective in improving livestock productivity, production, and household income. As a result:

- Mortality rates for pigs and poultry have fallen from 15 to 11.8 percent and from 41 to 33 percent respectively, thus raising farm output and income.

- Fattening times for pigs and poultry have been shortened from 136 to 118 days and 66 to 58 days respectively, thereby lowering costs of animal feeding and allowing farmers to increase production intensity.
- The herd and flock size of pigs and poultry has expanded by 25 percent and 46 percent respectively, thus raising output and increasing returns.

The Project has also successfully addressed issues relating to environmental management in production, slaughtering, and marketing of pigs and poultry. After 5 years of operation, over 105,000 people have directly benefited from the project activities. They included farmers in the 46 GAPH zones, extension workers and local veterinarians, meat vendors, and slaughterhouse owners. 47% of the direct beneficiaries are women. Specifically:

- 10,791 households have improved waste disposal systems and applied improved production practices.
- 43 medium and large slaughterhouses have installed waste disposal systems and management practices that meet national standards.
- 197 small slaughterhouses have improved their waste management facilities and practices.
- 381 wet markets have been improved their waste management facilities and meet national environmental standards.

The Project has also contributed to improving food safety for the benefit of consumers:

- Assisting 197 small slaughterhouses improve the safety of meat, evidenced by inspection and testing for bacteria;
- Assisting 43 medium and large slaughterhouses improve their meat handling and selling facilities and practices--to satisfy national food safety standards.

" Three years ago, we invested almost US\$ 45,000 in a laying hen farm. The farm houses 2,000 laying hens, of which approximately 90 percent of the hens lay eggs daily, producing close to 1,800 eggs. Thanks to the project, we regularly attended training courses, took field visits to good husbandry demonstration, and learnt new husbandry techniques. This results in a net profit of about US5 cents/egg. Now we could earn up to US\$2,500 every month thanks to the farm. We are planning to extend

our flock up to 5,000 laying hens next year, in order to utilize maximum capacity of the farm. "

Mr. Nguyen Chi Loc and Mrs. Pham Thi Le
Farmers, Chuong My District, Hanoi



Mr. Nguyen Chi Loc takes care of the hens in his farm.

LIFSAP

Bank Group Contribution

The Project was approved by the WBG Board in September 2009, with a closing date of December 31, 2015. Project cost totaled US\$79.03 million, with US\$65.26 million financed from IDA and US\$13.77 million from the Government of Vietnam.

Partners

The Project was successful as a result of strong partnerships with technical departments of the Animal Health and Livestock Production, Ministry of Agriculture and Rural Development, as well as departments of agriculture and rural development in 12 participating provinces.

Moving Forward

Positive and significant results proved the relevancy and efficiency of the Project approach. Further impact can be achieved through scaling-up and leveraging interventions for GAHP household producers, wet markets and small slaughterhouses, to reach beyond the original geographic coverage of 12 provinces.

 **105,000 people**

have directly benefited from improved production practices, waste management, etc.

RELATED

PROJECT WEBSITE

Livestock Competitiveness and Food Safety (<http://www.lifsap.vn/>)

PHOTOBOOK

Let Me Tell You Stories of LIFSAP

(<http://pubdocs.worldbank.org/pubdocs/publicdoc/2016/4/450711460608129630/Vietnam-LIFSAP-photobook-English>)

[Vietnam \(/en/country/vietnam\)](#)

[East Asia and Pacific \(/en/region/eap\)](#)

[Agriculture \(/en/topic/agriculture\)](#)

RELATED PROJECT

Vietnam Livestock Competitiveness and Food Safety (<http://projects.worldbank.org/P090723/vietnam-livestock-competitiveness-food-safety?lang=en>)