

# Written Submission on Asian Development Bank's (ADB) September 2023 Draft Environmental and Social Framework (ESF)

Submission from Asia for Animals Coalition  
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May 2, 2024

**Re: Input on ADB's Draft Environmental and Social Framework (ESF)**

Dear Sir, Madam,

The **Asia for Animals Coalition** is a network of local and international animal protection and conservation organizations, and is the largest of its kind in the world. We appreciate the opportunity to provide input on the Asian Development Bank's (ADB) Draft on the Environmental and Social Framework (ESF). Below, we present a case for the integration of stronger animal welfare standards in the ESF. We encourage the inclusion of specific provisions that prevent investments in activities likely to harm animal health, welfare, and the environment - consistent with global best practices and to underline ADB's commitment to sustainability and ethical considerations in operations.

The ESF comprehensively addresses the environmental and social risks of development projects financed by the Asian Development Bank (ADB), but currently lacks explicit animal welfare considerations. The significance of animal welfare is increasingly recognized by international bodies.<sup>1,2</sup> Poor animal welfare standards, especially in livestock farming, and during the capture, farming, handling, transport and sale of wild animals for trade purposes, can lead to biodiversity loss, ecosystem degradation, and the emergence and spread of zoonotic pathogens, which are pivotal considerations under the ESF's objectives for sustainable natural resources management and biodiversity conservation.<sup>3,4,5</sup> Intensive animal farming, poor wild animal management, and frequent interactions between animals and humans significantly increase the likelihood of

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<sup>1</sup> OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Publishing, Paris, Chapter 6, Para. 85 <https://doi.org/10.1787/81f92357-en>.

<sup>2</sup> United Nations Environment Programme. (2020). Animal welfare–environment–sustainable development nexus.

Retrieved from

<https://wedocs.unep.org/bitstream/handle/20.500.11822/39795/ANIMAL%20WELFARE%e2%80%93ENVIRONMENT%e2%80%93SUSTAINABLE%20DEVELOPMENT%20NEXUS.%20English.pdf?sequence=1&isAllowed=y>

<sup>3</sup> Tajudeen, Y. A., Oladunjoye, I. O., Bajinka, O., & Oladipo, H. J. (2022). Zoonotic spillover in an era of rapid deforestation of tropical areas and unprecedented wildlife trafficking: Into the wild. *Challenges*, 13(2), 41.

<https://doi.org/10.3390/challe13020041>

<sup>4</sup> Morand, S. (2020). Emerging diseases, livestock expansion, and biodiversity loss are positively related at global scale. *Biological Conservation*, 248, 108707. <https://doi.org/10.1016/j.biocon.2020.108707>

<sup>5</sup> Mozer, A., & Prost, S. (2023). An introduction to illegal wildlife trade and its effects on biodiversity and society. *Forensic Science International: Animals and Environments*, 3, 100064. <https://doi.org/10.1016/j.fsiae.2023.100064>



zoonotic pathogens with disease potential emerging and spreading.<sup>6,7,8,9,10,11</sup> Such pathogens can have devastating effects on public health, economic stability, and social equality. Proactively mitigating the transfer of pathogens from animals to humans is far more cost-effective than responding to outbreaks after they occur.<sup>12</sup>

Additionally, practices including the procurement of wild animals for trade, and high-density livestock production, also contribute significantly to deforestation and antimicrobial resistance, creating profound environmental and social risks.<sup>13,14,15,16</sup> Globally, the livestock sector is responsible for approximately 16.5% of global greenhouse gas emissions, primarily through methane and nitrous oxide production, underscoring the significant impact of animal farming on climate change.<sup>17</sup> Moreover, including explicit animal welfare standards in the ESF would strengthen ADB's commitment to social inclusion and equity. Practices like using animals in tourism and entertainment often involve cruelty and exploitation, undermining the social and

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<sup>6</sup> Swift, L., Hunter, P. R., Lees, A. C., & Bell, D. J. (2007). Wildlife Trade and the Emergence of Infectious Diseases. *Ecohealth*, 4(1), 25. <https://doi.org/10.1007/s10393-006-0076-y>

<sup>7</sup> Espinosa, R., Tago, D. & Treich, N. Infectious Diseases and Meat Production. *Environ Resource Econ* 76, 1019–1044 (2020). <https://doi.org/10.1007/s10640-020-00484-3>

<sup>8</sup> Debnath, F., Chakraborty, D., Deb, A. K., Saha, M. K., & Dutta, S. (2021). Increased human-animal interface & emerging zoonotic diseases: An enigma requiring multi-sectoral efforts to address. *The Indian journal of medical research*, 153(5&6), 577–584. [https://doi.org/10.4103/ijmr.IJMR\\_2971\\_20](https://doi.org/10.4103/ijmr.IJMR_2971_20)

<sup>9</sup> Marchese, A., & Hovorka, A. (2022). Zoonoses Transfer, Factory Farms and Unsustainable Human–Animal Relations. *Sustainability*, 14(19), 12806. <https://doi.org/10.3390/su141912806>

<sup>10</sup> Brice, J., Soldi, R., Alarcon-Lopez, P., Guitian, J., Drewe, J., Baeza Breinbauer, D., & Torres-Cortes, F. (2021). The relation between different zoonotic pandemics and the livestock sector. \*Publication for the Committee on the Environment, Public Health, and Food Safety, Policy Department of Economic, Scientific and Quality of Life Policies, European Parliament, Luxembourg\*. Retrieved from [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/695456/IPOL\\_STU\(2021\)695456\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/695456/IPOL_STU(2021)695456_EN.pdf)

<sup>11</sup> Karesh, W. B., Cook, R. A., Bennett, E. L., & Newcomb, J. (2005). Wildlife trade and global disease emergence. *Emerging Infectious Diseases*, 11(7), 1000–1002. <https://doi.org/10.3201/eid1107.050194>

<sup>12</sup> Bernstein, A. S. et al. (2022). The costs and benefits of primary prevention of zoonotic pandemics. *Science Advances*, 8(8), eabl4183. <https://doi.org/10.1126/sciadv.abl4183>

<sup>13</sup> Vittecoq, M., Godreuil, S., Prugnotte, F., Durand, P., Brazier, L., Renaud, N., Arnal, A., Aberkane, S., Jean-Pierre, H., Gauthier-Clerc, M., Thomas, F. and Renaud, F. (2016), Antimicrobial resistance in wildlife. *J Appl Ecol*, 53: 519–529. <https://doi.org/10.1111/1365-2664.12596>

<sup>14</sup> Ritchie, H. (2021). Cutting down forests: What are the drivers of deforestation? *Our World in Data*. Retrieved from <https://ourworldindata.org/what-are-drivers-deforestation>

<sup>15</sup> Stanley, D., Batacan, R., & Bajagai, Y. (2022). Rapid growth of antimicrobial resistance: The role of agriculture in the problem and the solutions. *Applied Microbiology and Biotechnology*, 106(21), 6953–6962. <https://doi.org/10.1007/s00253-022-12193-6>

<sup>16</sup> Mitchell, J. (2023). Antimicrobial resistance (AMR) as a form of human–wildlife conflict: Why and how non-domesticated species should be incorporated into AMR guidance. *Ecology and Evolution*, 13(9), e10421. <https://doi.org/10.1002/ece3.10421>

<sup>17</sup> Twine, R. (2021). Emissions from Animal Agriculture—16.5% Is the New Minimum Figure. *Sustainability*, 13(11), 6276. <https://doi.org/10.3390/su13116276>



ethical fabric of communities.<sup>18</sup> By setting clear guidelines against such practices, ADB can champion more humane and ethically responsible forms of tourism and entertainment.

To ensure comprehensive environmental and social responsibility, we strongly recommend the following additions to the ESF:

- **Prohibit Harmful Practices:** We urge the explicit prohibition of financing for activities that involve harmful animal practices, such as the exploitation of wild animals for trade, high-density livestock production and the use of animals in testing that fall below international standards. These prohibitions should be included in the Prohibited Investment Activities List.
- **Strengthen Animal Welfare Standards Across Funded Projects:** Explicit and enforceable animal welfare standards should be integrated into the ESF, especially under Environmental and Social Standard 6 (Biodiversity and Sustainable Natural Resources Management). The ESF should give explicit instructions that take into account the need for animals to be provided with adequate space, environmental enrichment, and the opportunity to exhibit natural behaviors, in line with the widely accepted Five Domains model for animal welfare originally developed by Mellor and Reid in 1994. In addition, it should also categorically prohibit harmful practices such as tail docking, debeaking, and overcrowding. We recommend ADB adopt the Responsible Minimum Standards of the FARMS Initiative for more comprehensive higher welfare farmed animal practices. Moreover, these standards must enforce practices that prevent the destruction of habitat and ensure the humane treatment and health of animals, therefore embedding animal welfare deeply into every phase of the project's lifecycle—from planning and execution to ongoing monitoring.
- **Enhance Monitoring and Reporting:** We suggest that funded projects should incorporate strong and transparent monitoring and reporting systems that focus on ensuring and demonstrating high animal welfare practices. By being more transparent, it will be possible for stakeholders, including civil society, local communities, and international observers, to hold operations accountable for maintaining high standards of animal welfare. This should involve:
  - a. Implementing a dedicated grievance mechanism that specifically addresses animal welfare concerns.
  - b. Conducting regular audits and making the audit findings publicly available.
  - c. Establishing a formal process that allows civil society and other stakeholders to effectively address and correct any failures.

Furthermore, incorporating specific animal welfare metrics into the monitoring frameworks will significantly improve both transparency and the effectiveness of these

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<sup>18</sup> von Essen, E., Lindsjö, J., & Berg, C. (2020). Instagranimal: Animal welfare and animal ethics challenges of animal-based tourism. *Animals*, 10(10), 1830. <https://doi.org/10.3390/ani10101830>



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measures. These improvements will not only strengthen accountability but also demonstrate the ESF's commitment to promoting sustainable development and responsible business practices.

- **Facilitate Stakeholder Engagement on Animal Welfare:** Establish platforms for ongoing communication with animal welfare organizations, local communities, and other stakeholders. This will not only enhance the implementation of animal welfare measures but also improve the inclusiveness and responsiveness of ADB's projects. This is especially important for projects that intersect with natural habitats and involve the use of animals. Such engagement should be outlined in Environmental and Social Standard 10 (Stakeholder Engagement and Information Disclosure), to ensure that these voices are not only heard but also actively integrated into project planning and execution.
- **Develop Education and Capacity Building programs:** We propose the introduction of educational and capacity-building programs for ADB clients on best practices in animal welfare. This is to ensure that project implementers are well-equipped to handle animal welfare considerations effectively and ethically.

The undersigned organizations from around the globe, on behalf of the many millions of members they represent, respectfully urge the Asian Development Bank to include the noted changes into the Environmental and Social Framework. It is crucial that these changes be made for the ESF to be in line with international standards and expectations regarding animal welfare, ensuring that all projects funded by the ADB not only comply with but also champion these important standards. By adopting these changes, the ADB can demonstrate its leadership in sustainable and ethical development, contributing positively to both environmental preservation, community wellbeing and animal protection.

**Sent on behalf of AfA's Core Member Organizations:**

1. Anima Society for the Protection of Animals (Macau) (ANIMA)
2. Animal Concerns Research & Education Society (ACRES)
3. Animal People, Inc
4. Animal Protection Denmark
5. Animal Rescue Cambodia (ARC)
6. Animals Asia Foundation (AAF)
7. Blue Cross of India (BCI)
8. Born Free Foundation
9. Federation of Indian Animal Protection Organisations (FIAPO)
10. International Animal Rescue (IAR)
11. International Fund for Animal Welfare (IFAW)
12. Jane Goodall Institute - Nepal
13. Philippine Animal Welfare Society (PAWS)



14. Samayu
15. Sarawak Society for the Prevention of Cruelty to Animals (SSPCA)
16. Society for the Prevention of Cruelty to Animals Hong Kong (SPCA HK)
17. Taiwan Human-Animal Studies Institution (THASI)
18. VShine Animal Protection Association
19. World Animal Protection (WAP)

Please respond to Lauren Arnaud James, Asia for Animals Coalition, [info@asiaforanimals.com](mailto:info@asiaforanimals.com)

