7 March 2025

Mr. Anup Jagwani, Head, Global Agribusiness
Ms. Aliza Marcus, Senior Communications Officer, Agribusiness
International Finance Corporation

Dear Anup, Dear Ms. Marcus

Re: **IFC webpage 'Striving for Sustainability: IFC's Role in the Livestock Sector'**

We welcome the constructive relationship that we have with IFC. Within that context, we would like to make some comments on the above webpage which we hope explain our concerns.

Animal welfare: The webpage says it is a myth that industrial livestock production results in poor animal welfare. However, the fact that poor welfare is inherent in factory farming is well established by scientific research. The European Food Safety Authority (EFSA) has recently produced detailed Scientific Opinions on several species including pigs, chickens reared for meat, and egg laying hens. To produce its Opinions it carries out an extensive review of scientific studies. It does not confine its review to European studies. EFSA's Opinions show that industrial production results in poor animal welfare and recommend far-reaching reforms.

IFC's own *Good Practice Note* identifies (on page 13) the following as welfare risks in intensive systems: limitations on space in individual stalls; high stocking densities; barren environments; injurious procedures that cause pain; and breeding for production traits that heighten anatomical or metabolic disorders. All these welfare problems are common in factory farming.

Rising demand for animal based foods: The webpage states that overall demand for animal-based foods is expected to rise by nearly 70%. However, I recently produced a detailed analysis which calculates that the world population anticipated by 2050 could be fed without significant increases in production if the following forms of food loss were halved: food waste in the conventional sense e.g. post-harvest losses and food being discarded by households and retailers; the losses due to poor conversion by animals of human-edible cereals and soy; over-consumption beyond one's nutritional needs; and use of crops as biofuels.

We are surprised that IFC does not recognise that a 70% increase in animal production would be highly damaging for climate change and nature. This contrasts with the 2024 report entitled *The economics of the food system transformation*. The members of the Commission that produced this report include Juergen Voegele and Geeta Sethi. The report states that in order to tackle what it refers to as the global climate, nature and health emergencies, high- and middle-income regions need to reduce their per capita intake of animal-sourced food by 68% and 62% respectively from 2020 to 2050. It says that low-income regions need to see a 33% total decline in the intake of animal-sourced foods, though their intake by currently undernourished groups in those regions should increase to improve health.

Food security: The website states that it is a myth that industrial animal production is bad for food security. It is not a myth. The International Grains Council states that 44.8% of global grain

production is used as animal feed.[1] This undermines food security as animals convert these crops very inefficiently into meat and milk. Research shows:

- for every 100 calories of human-edible cereals fed to animals, just 7-27 calories (depending on the species) enter the human food chain as meat;

- for every 100 grams of protein in human-edible cereals fed to animals, just 13-37 grams of protein enter the human food chain as meat.

Studies indicate that if human-edible crops were no longer fed to farmed animals, an additional 3.5 billion people could be fed each year.[2] UNEP states: 'more efficient use of resources is essential to fight food insecurity and malnutrition … Reducing the use of much of the world's grain production to feed animals and producing more food for direct human consumption can significantly contribute to this objective'.

Environment: The website states that the view that industrial animal production is bad for the environment is a myth. It is not a myth. Insufficient attention is given to the link between the livestock and arable sectors. Industrial animal agriculture's huge demand for cereals has been a key factor fuelling the intensification of crop production. This, with its use of monocultures and agro-chemicals, has led to soil degradation,[3] biodiversity loss, and overuse and pollution of water.

Hoekstra (2020) calculates that animals fed on cereals and soy (industrially farmed animals) use 43 times as much surface- and groundwater and are 61 times as polluting of water as animals fed on grass and other roughages. The monocultures used to produce grain and soy as animal feed lead to soil degradation**,** decreased crop yield and quality and increased disease incidence and pest occurrence. In contrast, the UN states that with sustainable soil management we could globally produce up to 58% more food.

Small-scale farmers: The website says it is a myth that industrial systems undermine the socio-economic potential of small-scale farmers in the developing world. However, the World Bank report *Recipe for a Liveable Planet* states: 'the global agrifood system disproportionately and detrimentally affects poor communities and smallholder farmers who cannot compete with industrial agriculture, thereby exacerbating rural poverty and increasing landlessness'.

There is growing recognition of the value of agroecology and regenerative agriculture in boosting small-scale farmers' yields and livelihoods and enhancing soil quality and biodiversity while avoiding expensive inputs. For example, the World Bank is supporting a conservation agriculture project in Brazil. Using conservation agriculture, one farmer in Brazil has increased crop yields by 50% and decreased herbicide use by 60% in the last eight years. The Agroecology Coalition states: 'Diverse agroecological systems can improve the resilience of family farmers and rural communities and boost local economies and markets'. Thirty-nine African, Asia-Pacific and Latin American Governments are members of the Agroecology Coalition.

Climate change: The webpage says that IFC Investments in livestock are consistent with the Paris Agreement. The World Bank's *Recipe for a Liveable Planet* states: 'Emissions from agrifood must be cut to net zero by 2050'; studies show that further major growth in the livestock sector is incompatible with the World Bank target.[4] Harwatt *et al.* (2024) surveyed over 200 climate scientists and sustainable food/ agriculture experts. The survey indicates:

- there are no credible pathways to meeting the Paris Agreement that allow the livestock sector to continue growing;

- global emissions from the livestock sector should peak by 2025 and then drop rapidly, by 50% by 2030, and 61% by 2036 and that the most effective options for reducing emissions are through reduced production of livestock products.

Safety: The website argues that large-scale projects are safe. However, studies indicate that the crowded, stressful conditions of industrial animal production lead to an increased risk of the emergence, transmission and amplification of pathogens including zoonoses.[5] Biosecurity, though essential, is not sufficient to prevent the entry of disease into large, intensive livestock housing. To minimise disease risks, both biosecurity measures and the keeping of animals in conditions that are supportive of good health and effective immunocompetence are necessary.

Antibiotics: The website highlights the need for 'responsible and prudent' use of veterinary antibiotics. This term is too broad and more specific wording is needed as over 70% of global antibiotics are used in farm animals. We urge IFC to follow EU law which prohibits routine use of antibiotics in farm animals and the preventive use of antibiotics in groups of animals.[6]

Given the foregoing, we ask that IFC modify its 'myths' claims to reflect relevant scientific and economic studies, including those from the World Bank. We are also happy to discuss these issues and alternatives for the private sector to promote food and nutrition security and agricultural sustainability at the earliest feasible date.

Yours sincerely

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[1] International Grains Council, 2025. gmr. Accessed 1 February 2025
[2] Cassidy E.M *et al*, 2013. Redefining agricultural yields: from tonnes to people nourished per hectare. University of Minnesota. Environ. Res. Lett. 8 (2013) 034015; Nellemann, C., MacDevette, M., Manders, *et al.*, 2009. *The environmental food crisis – The environment's role in averting future food crises*. A UNEP rapid response assessment. United Nations Environment Programme, GRID-Arendal, www.unep.org/pdf/foodcrisis_lores.pdf
[3] Edmondson *et al.*, 2014. Urban cultivation in allotments maintains soil qualities adversely affected by conventional agriculture. Journal of Applied Ecology 2014, 51, 880–889; Tsiafouli *et al.*, 2015. Intensive agriculture reduces soil biodiversity across Europe. *Global Change Biology*: 21, p973–985.
[4] Clark *et al.*, 2020. Global food system emissions could preclude achieving the 1.5° and 2°C climate change targets. Vol 370, Issue 6517 pp. 705-70 https://www.science.org/doi/10.1126/science.aba7357;

Springmann, M. *et al.*, 2018. Options for keeping the food system within environmental limits. *Nature* https://www.nature.com/articles/s41586-018-0594-0

[5] United Nations Environment Programme, 2020. Preventing the next pandemic - Zoonotic diseases and how to break the chain of transmission; Bernstein, A. *et al.*, 2022. The costs and benefits of primary prevention of zoonotic pandemics. *Sci. Adv.* 8, eabl4183; IUCN, 2022. Situation analysis on the roles and risks of wildlife in the emergence of human infectious diseases. https://portals.iucn.org/library/node/49880

[6] Article 107 of Regulation 2019/6 of the European Parliament and of the Council on veterinary medicinal products.