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Mr. Aminur Rahman
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Please reply to:
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Dear Sangmoo Kim and Aminur Rahman

Re: AIIB Project Number P000814 and ADB Project Number: 56253-001, Bangladesh - 'Climate Resilient Inclusive Development Program (Subprogram 1)'

The undersigned organisations are writing to you regarding Project P000814/56253-001 which 'supports implementation of the GoB-led national climate objectives as articulated in the National Adaptation Plan (NAP), 2023–2050 and the Nationally Determined Contributions 2021 update (NDC-U)'. These documents include various measures that impact the livestock sector. For instance, the NDC aims to 'replace low-producing animals with high-producing crossbred cattle'.

We are concerned about the detrimental impacts of using high-producing crossbred cattle, both on the grounds of animal welfare and because this indicates a likely expansion of harmful industrial animal agriculture (IAA). While [project documents](#) we have seen do not state that project funds will be used to support IAA, at least directly, we would suggest excluding IAA from eligibility for financing under this program, and/or negotiating prior actions that eliminate public funding for IAA.

We understand Bangladesh's desire to increase the milk yield of its lowest yielding cows. However, we urge Bangladesh not to use the very high-yielding dairy cows that are common in the EU and US such as Holsteins. These cows need substantial amounts of soy and cereals such as corn in their feed. These crops would feed many more people if used for direct human consumption rather than being fed to animals.

Bangladesh's growing dairy sector has led to increasing dependence on feed imports, mainly corn and soy. Bangladesh is already a major importer of soy with Brazil being its largest supplier. Importing soy from Brazil adds to deforestation in Brazil which releases huge amounts of stored carbon into the atmosphere and leads to biodiversity loss, so undermining the Paris Climate Agreement and the Kunming-Montreal Global Biodiversity Framework.

Health and welfare problems of animals bred for ‘improved productivity’

Significant gains in productivity from farmed animals can be achieved through better nutrition and veterinary care. These inputs can improve their welfare without placing excessive demands on them.

Severe animal welfare problems have arisen through selective breeding for increased productivity. A cow producing enough milk for her calf would produce just over 1,000 litres in her 10-month lactation. But commercial dairy cows such as Holsteins have been selectively bred for very much higher yields. Cows producing unnaturally high yields suffer due to hunger or acute metabolic disease because of an imbalance between nutrient supply and demand. They may suffer chronic discomfort, pain and lameness due to distortion of body shape, bad housing or poor management. They are at increased risk of infectious or metabolic disease and metabolic or physical exhaustion after prolonged high production.¹

With such fragile health, in order to survive they need high levels of expensive and resource-intensive inputs including specialist concentrate feed, veterinary interventions and high levels of management. After just three to four lactations (milk-producing cycles) they are often so exhausted and in such poor health that they are no longer able to produce milk and have to be prematurely culled.

Using such cows is economically inefficient. Dairy cows do not produce their first calf (and milk) until the age of two years. It is economically questionable for farmers to go to the expense of feeding them for two years before they begin to produce milk, when high-yielding cows often have to be culled after just three to four lactations. This gives very little time for farmers to make a return on the costs involved in bringing the cow to the age where she is able to produce milk.

The effects of climate change are an added threat to the welfare of animals who are already suffering because of selective breeding for high yield. The animal farming industry should adopt only healthy and robust animal breeds.

The detrimental impacts of industrial livestock production

Undermining food security: Industrial livestock production is dependent on using human-edible cereals and soy as animal feed. Animals convert these crops very inefficiently into meat and milk, thereby undermining food security.^{2 3 4 5 6} UNEP’s 2022 Emissions GAP Report states that ‘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 fighting food insecurity and malnutrition.⁷

Environmental harms: Industrial livestock’s huge demand for cereals and soy as feed has fuelled the intensification of crop production. This, with its use of monocultures and chemical fertilisers and pesticides, has led to overuse and pollution of ground- and surface-water,⁸ soil degradation,^{9 10} biodiversity loss,¹¹ and air pollution.¹²

Climate change: Industrial livestock production is responsible for significant greenhouse gas (GHG) emissions. The Intergovernmental Panel on Climate Change states ‘Producing animal-sourced food (e.g. meat and dairy) emits larger amount of GHGs than growing crops, especially in intensive, industrial livestock systems’.¹³

High use of antimicrobials in industrial animal agriculture: Globally, around 70% of all antimicrobials are used in farm animals, mainly to prevent disease and to promote growth.¹⁴ Antimicrobials are regularly used in industrial livestock systems to prevent the diseases that would otherwise be inevitable when animals are confined in poor conditions.¹⁵ Overuse of

antimicrobials in industrial farming contributes significantly to antimicrobial resistance in animals which can then be transferred to people, so undermining the efficacy of antimicrobials in human medicine.¹⁶

Industrial animal agriculture entails high disease and pandemic risks: The crowded, stressful conditions of industrial livestock production play an important part in the emergence, spread and amplification of pathogens, some of which are zoonotic.^{17 18} A report by IUCN (International Union for Conservation of Nature) in 2022 states: 'A certain way to reduce risk of zoonosis and emerging infectious diseases globally ... is to reduce dependence on intensive animal-based food production systems'.¹⁹

A recent report by the Food System Economics Commission (FSEC) advocates a shift to healthy diets with, over the next 30 years, all countries replacing diets dominated by empty calories and animal-sourced proteins to more vegetables, fruits, nuts, legumes, and whole grains, and a move to environmentally sustainable food production.²⁰

While the project does not directly finance industrial livestock production, it may contribute to it indirectly by supporting the implementation of Bangladesh's climate policies. In view of the updates of countries' NDCs scheduled for early 2025, we urge AIIB and ADB to support Bangladesh in reviewing its NDC (and NAP) policies so as to avoid the inclusion of elements that foster the development of industrial livestock production.

We would very much welcome a meeting with you to discuss the above.

Yours sincerely

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Alessandro Ramazzotti, International Accountability Project

¹ Webster J, 2004. Animal Welfare: A Cool Eye Towards Eden. Blackwell, Oxford

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⁷ UNEP, 2022. The closing window: Emissions Gap Report 2022. <https://www.unep.org/resources/emissions-gap-report-2022>

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⁹ Edmondson JL *et al.*, 2014. Urban cultivation in allotments maintains soil qualities adversely affected by conventional agriculture. *Journal of Applied Ecology* 51:880–889

¹⁰ Tsiafouli MA *et al.*, 2015. Intensive agriculture reduces soil biodiversity across Europe. *Global Change Biology* 21:973–985

¹¹ World Health Organization and Secretariat of the Convention on Biological Diversity, 2015. Connecting global priorities: biodiversity and human health

¹² Lelieveld J *et al.*, 2015. The contribution of outdoor air pollution sources to premature mortality on a global scale. *Nature* 525(7569):367-71. doi: 10.1038/nature15371

¹³ Intergovernmental Panel on Climate Change, 2019. Climate Change and Land Use

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¹⁵ O'Neill Review on antimicrobial resistance, 2015. <https://amr-review.org/>

¹⁶ World Health Organisation, 2017. Stop using antibiotics in healthy animals to prevent the spread of antibiotic resistance.

<https://www.who.int/news/item/07-11-2017-stop-using-antibiotics-in-healthy-animals-to-prevent-the-spread-of-antibiotic-resistance>

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¹⁹ IUCN, 2022. Situation analysis on the roles and risks of wildlife in the emergence of human infectious diseases.

<https://portals.iucn.org/library/efiles/documents/2022-004-En.pdf>

²⁰ FSEC, 2024. The Economics of the Food System Transformation. <https://foodsystemeconomics.org/wp-content/uploads/FSEC-GlobalPolicyReport-February2024.pdf>