



Please reply to:  
Peter Stevenson OBE  
Compassion in World Farming  
River Court, Mill Lane, Godalming  
GU7 1EZ, UK

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Email: [peter.stevenson@ciwf.org](mailto:peter.stevenson@ciwf.org)

Mary Porter Peschka  
Director, ESG Sustainability Advice & Solutions Department  
International Finance Corporation

Dear Mary

**IFC proposed financing of the expansion of Mavin's pig breeding and commercial pig farming capacity in Vietnam: Project 45292**

We are concerned that IFC continues to fund industrial livestock projects that appear to give insufficient attention to the letter and spirit of the IFC's Good Practice Note (GPN) on *Improving animal welfare in livestock operations* and the OIE Guidelines. Compassion in World Farming appreciates the constructive meetings it has had with your colleagues in recent years but there does not appear to have been any change in IFC's policy as IFC continues to fund industrial livestock projects.

Your website states that Mavin's farm expansion in Vietnam which IFC will support "is anticipated to increase the breeding herd by 7,500 head and gilt raising capacity by 72,000 head". IFC's website states that it has verified that Mavin's animal welfare management practices will comply with the OIE Guidelines, but little evidence of this is provided.

**Gestation crates:** We would be grateful if you would confirm that none of the new facilities financed by IFC will use gestation crates. Mavin's [website](#) shows the use of such crates.

**Enrichment:** OIE Article 7.13.10 provides: "Animals should be provided with an environment that provides complexity, manipulability and cognitive stimulation to foster normal behaviour (e.g. exploration, foraging such as rooting, biting and chewing materials other than feedstuffs, and social interaction), reduce abnormal behaviour (e.g. tail, ear, leg and flank biting, sham chewing, bar biting and apathetic behaviour) and improve their physical and mental state ... Novelty is another aspect that is important in maintaining interest in the provided materials".

IFC's GPN identifies "barren unchanging environments leading to behavioural problems" as a welfare risk and states this risk can be mitigated by providing environmental enrichment such as "straw for pigs to manipulate". We would be grateful if you would let us know if the Mavin farms being financed by IFC will provide enrichment materials.

**Castration, Tail docking and Teeth clipping:** IFC's GPN identifies "injurious husbandry procedures that cause pain" as a welfare risk. It states this risk can be addressed by avoiding such procedures or using low-pain methods or analgesics. The OIE Guidelines refer to the

“ ‘three Rs’: replacement (e.g. using entire males or immunocastrated males rather than surgically castrated males), reduction (e.g. tail docking and teeth clipping only when necessary) and refinement (e.g. providing analgesia or anaesthesia)”. We would be grateful if you could tell us what steps will be taken on the Mavin farms supported by IFC to avoid these mutilations.

**Pig breeding:** The project also involves pig breeding. The IFC GPN recognises that welfare risks are entailed in “breeding for production traits that heighten anatomical or metabolic disorders”. The breeding of sows for large litters is a major risk factor for high levels of piglet mortality.<sup>1</sup> Mortality increases with increasing litter size due to low birth weights, variability in piglet weights, a greater percentage of low viability piglets, an increased proportion of crushed piglets, and starvation caused by some piglets being unable to access a teat.<sup>2 3 4</sup> Many of the causes of mortality (chilling, starvation, injury, disease), may also cause suffering in the piglets that survive.<sup>5</sup> We hope that the IFC financing will not support sows bred for unduly large litters.

#### **Location of farms within forests**

IFC’s website states that three farms being supported under IFC’s investment are located within forest locations, with one site overlapping with a location that includes 18 critically endangered species including civets, loris, and pangolins. This is a high risk move as expansion of farmland into forests leads to ecosystem disruption and loss of biodiversity, both of which increase the risk of pathogen spillover<sup>6</sup> and viruses being transmitted from wild animals to people.<sup>7</sup>

**Use of soy in Mavin feed mills:** IFC’s website states that soy from Brazil and Argentina will be used. This will fuel deforestation.<sup>8 9</sup>

In light of the above concerns, we urge IFC not to finance Mavin’s proposed expansion.

#### **Sustainability and health reasons for ending IFC funding of industrial livestock**

There are many reasons in addition to poor animal welfare why IFC should not finance industrial livestock production. With its crowded, stressful conditions industrial livestock production contributes to the **emergence, spread and amplification of pathogens**.<sup>10 11 12</sup> The last pandemic before Covid emerged from farm animals. This was the 2009 swine flu pandemic which started in Mexico, close to a major concentration of industrial pig farms. A recent study concluded that European pig farms – nearly all of which are industrial - host building blocks for pre-pandemic influenza viruses.<sup>13</sup>

Industrial production routinely uses antibiotics to prevent the diseases that are inevitable when animals are kept in poor conditions. This leads to **antibiotic resistance** in animals which can then be transferred to people, so undermining the efficacy of antibiotics in human medicine.

In addition to utilising large amounts of soy, industrial production uses 40% of global cereal production – wheat, corn, barley – to feed farm animals<sup>14</sup>; they convert this very inefficiently into meat and milk so **undermining food security**.<sup>15 16</sup> If the cereals used as animal feed were instead used for direct human consumption an extra 3.5 billion people could be fed each year.<sup>17</sup>

Industrial livestock’s huge demand for grain has fuelled the intensification of crop production. This, with its monocultures and agro-chemicals, has led to soil **degradation**,<sup>18 19</sup> **biodiversity loss**,<sup>20 21</sup> **pollution and overuse of water**<sup>22</sup> **and air pollution**<sup>23</sup>. The UNCCD states that livestock production is “perhaps the single largest driver of biodiversity loss”.<sup>24</sup> The UN states that “Intensive livestock production is probably the largest sector-specific source of water pollution”.<sup>25</sup>

Industrial animal agriculture **out-competes small-scale food producers**, thereby undermining their livelihoods. In 2018 the then Director-General of the FAO said that small-scale livestock farmers must not be “pushed aside by expanding large capital-intensive operations”.<sup>26</sup>

We urge IFC to stop funding industrial production and to instead support sustainable forms of animal farming. IPBES and the European Commission identify organic farming, agro-ecology, agro-forestry, and low-intensive permanent grassland as sustainable practices.<sup>27 28</sup>

Yours sincerely

50by40, Lasse Bruun, Global Director  
Brighter Green, Mia MacDonald, Executive Director  
Compassion in World Farming International, Peter Stevenson, Chief Policy Advisor  
Eurogroup for Animals, Iwona Mertin, Outreach Manager  
Feedback, Carina Millstone, Executive Director  
Sinergia Animal, Merel van der Mark, Animal Welfare and Finance Manager  
World Animal Protection International, Mark Dia - Global Programme Director, Farming

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