

#4 - [AR-PROVINCIAL AGRICULTURAL SERVICES PROGRAMME FL](#): the stated objective of the project is "to support climate action projects that facilitate the adaptation of agricultural production to market demands and promote the increase in added value of the sector's productive value chains". Moreover, the intervention aims to "improve the competitiveness of the **agro-industrial sector**" and "promot[e] private investments".

Looking at the Environmental and Social Data Sheet - the only E&S document provided in the project disclosure - there is no element that indicates investments will NOT benefit the livestock sector. For instance, it is stated that the project will promote "activities related to improving **productive landscapes** through sustainable management practices". *Productive landscapes* can include livestock grazing, and considering the context in which the project is taking place - i.e., Argentina is [one of the largest producers of meat](#) worldwide - if specific information is not provided, the reader (us in this case) can reasonably assume the project may benefit livestock producers.

And although we understand and welcome efforts to diminish the carbon footprint of food systems, if "agro-industrial" companies operating in the livestock sector - which are most of the times already wealthy enough - end up receiving millions of US\$ to supposedly implement "sustainable" production practices, that's just going to promote the continuation of a harmful sector (i.e., industrial livestock).

From the project document, it appears one of the main focuses of the project is to support the development of irrigation schemes. But again, given the context, it is likely that these irrigation schemes will promote the industrialization of feed production, and unless more specific information is provided, the reader can reasonably assume so.

Moreover, the project disclosures states that the project is aligned to various national policies, among which the National Plan for Adaptation and Mitigation to Climate Change (2022), which states: "efficiency in livestock production is achieved by enhancing herd productivity and increasing the volume of meat produced per slaughtered animal." As far as my understanding goes - but maybe someone in this thread can confirm - such a measure may have adverse consequences on animal welfare.

**Is the EIB ready to provide the list of the "22 sub-projects" along with specific information regarding the beneficiaries?** If yes, I guess we can remove the project from the list.

#6 - [ETG REGIONAL EXPANSION \(AFRICA\)](#): According to [Devex](#), "ETG, established in 1967, is one of the largest and fastest growing integrated agricultural conglomerates in sub-Saharan Africa, importing and exporting soft commodities to and from 49 countries". As it appears from [their website](#), they also produce (or source) and distribute animal feed.

The EIB stated that "the project consists of activities supporting: (i) the modernisation and upgrade of existing production facilities, (ii) the expansion and vertical integration of the Promoter's operations along their value chains, as well as (iii) the expansion of the extension services provided by the Promoter at granular level". Considering the background above, these objectives can be reasonably interpreted as being linked to industrial animal agriculture value chains.

To confirm this, [the project ESDS](#) clearly states that "The project will include various activities, ranging from energy efficiency measures, resource efficiency, **new food and feed processing capacity, storage and logistics solution, to expansion of their extension services in deep rural areas.**" As you can imagine, the part in bold is the one relevant to us in this case since it confirms the project is related to animal feed production (if not directly livestock too), and indicates ETG is strengthening its presence in rural areas, therefore creating patterns of industrialization and increased dependence of local farmers on large agro-industrial conglomerates. This really seems to be a push for [corporate capture](#) in the African agri-food sector.

The project disclosure seems to promote the actions of ETG as being purely beneficial to farmers, but - although I did not do any field research, unfortunately - I can imagine that these actions are aimed at increasing returns for ETG, and not for local farmers (i.e., ETG provides fertilizers and technical assistance to farmer in exchange for their harvest - at reduced prices? - which is then used to produce animal feed sold - to the same farmers or their neighbours? - at market prices).

#27 - [AGRIA FOOD PRODUCTION CAPACITY](#): I understand this project does not seem to directly promote animal feed, or livestock production. However, the client is an important industrial producer of animal feed - "sunflower meal" - according to [their website](#).

So here I would like to raise two considerations:

- Is the EIB properly checking that the funds it provides to the company for the "production of edible oil from oilseeds" are used for that purpose?
- Providing EUR 35 million to a large animal feed producer to improve its infrastructure and support its energy needs ("The project will therefore generate renewable thermal energy for self-consumption"), in my point of view - that maybe others in this thread share - is equal to supporting the continuation, expansion, and resilience of industrial animal agriculture value chains, even if the investment does not directly support growing feed crops.

Numbers 23, 24, and 32 are easier to address:

#23 - [IN OVO \(IEU GT\)](#): We collected ALL projects that we could identify related to the production and processing of animal products, as well as to the production and distribution of primary inputs such as feed and vaccines. That includes bad and better practices, and this project falls within the second. Indeed, we wanted to highlight it as an - relatively rare - example of better industrial practices being promoted by MDBs. The EIB is proving to be a champion, among the MDBs we analyzed, in terms of "progressive" investments in the agri-food sector. Examples include this project, as well as their [recent investment in MATR Foods](#).

#24 - [PROTIX \(IEU GT\)](#): Although there are diverging views on this topic, some of the groups within the S3F Coalition are strongly against the use of insects as animal feed. Despite the fact that raising them generally results in lower impacts on lands and people, let us not forget that insects are animals too, and killing billions of them to provide feed for larger animals that then feed humans sounds, to many, like a lot of atrocities at once that could be avoided if we just shifted to sustainable plant-based diets.

#32 - [COLD LAKE SUSTAINABLE ARCTIC CHAR \(IEU GT\)](#): The answer to #23 above can probably apply to this one too.