

From: [Kettner Michaela](#)
To: [info](#)
Subject: Sustainability Policy
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Hi and many thanks for the possibility of a public consultation on NIB's updated Sustainability Policy,

I appreciate NIB's intention to relate the topic of 'sustainability' not only to carbon emission but also to the reduction of resource intensity of human activity in general and the targeted growth "towards a well-being, well-functioning and productive society".

Comparing it to NIB's current Sustainability Policy and Guidelines (from 2012) and its detailed criteria for A,B and C projects, I wonder about the softening and higher degree of generalization in the renewed policy (and also the Mandate Rating Framework).

Especially regarding the food industry, the policy from 2012 explicitly mentioned intensive rearing of poultry and pigs (over a certain threshold) under its category 'A' and both the manufacturing of dairy products and slaughtering of animals under category 'B'. The new policy is obviously not considering this topic. However, industrial livestock farming and dairy production – even when complying to European regulation – is hard to be called neither sustainable nor ethical. As the new Sustainability Policy does not address this topic in the context of its Lending operations – should one conclude that NIB would finance slaughter installations and any kind of industrial farming, disregarding whether this is organic or not?

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I strongly hope that NIB will serve as a role model in this context within its peer group and look forward to a more sustainable future!

Kind regards,
Michaela Kettner