



**Warsaw, 23 June 2025**

Green REV Institute – Statement to the European Bank for Reconstruction and Development

Re: Proposed equity investment in Rex Concepts SA (Burger King & Popeyes CEE)

To: European Bank for Reconstruction and Development – Project Complaints Mechanism /  
Board of Directors

**Green REV Institute, a think tank coordinating the Future Food 4 Climate coalition, Safe Food Federation, experts and 75 CSOs, expresses its strong opposition to the EBRD's planned equity investment of USD 46.09 million in Rex Concepts SA, the company operating Burger King and Popeyes restaurants in Central and Eastern Europe.**

We respectfully call on the EBRD to suspend or cancel this decision, scheduled for a Board vote on 25 June 2025, due to the serious implications this investment would have on public health, climate, industrial farming and local food systems.



## **Key concerns**

### **A. Public financing of factory farming and intensive animal farming systems**

As documented in "The White Paper: Stench, Blood and Tears" (Sylwia Spurek, 2023), Poland is experiencing an aggressive expansion of industrial animal farming:

- Over 3,400 large-scale farms operate across the country.
- An estimated 77% of chickens and 58% of pigs are raised in confined, high-density systems.

These farms emit ammonia, methane, and nitrates, contaminating water and air, and harming both the climate and local communities. They also lead to the suffering of millions of animals who are typically confined in small, barren enclosures that prevent the expression of nearly all natural behavior (such as turning around or comfortably lying down).

### **B. Public health crisis: nutrition, obesity, and cancer<sup>1</sup>**

According to the Supreme Audit Office of Poland (NIK) expert panel (2024):

- Over 50% of children and adolescents eat unhealthily.
- 20–21% of children are overweight or obese.
- Unhealthy diet is now the leading cause of death in Poland, surpassing tobacco use and other chronic risk factors.

WHO and national data further show that:

---

<sup>1</sup> Lane M M, Gamage E, Du S, Ashtree D N, McGuinness A J, Gauci S et al. Ultra-processed food exposure and adverse health outcomes: umbrella review of epidemiological meta-analyses BMJ 2024; 384 :e077310 doi:10.1136/bmj-2023-077310



- Over 50% of adults are overweight or obese.
- Annual cancer cases are projected to reach 200,000 by 2029, with diet and lifestyle among the main drivers.

**The fast food model advanced by Burger King and Popeyes contributes to these trends by promoting ultra-processed, high-fat, high-salt animal-based meals, particularly to children and low-income groups.**

As highlighted in the report "Red and processed meat in the context of health and the environment: Information brief – Many shades of red and green" by the World Health Organization (WHO):

“The production of red meat has been identified as a key contributor to greenhouse gas emissions from agriculture compared to other types of food production. Together with milk, (...) it accounts for **55% of total global agricultural emissions**. Animal-based food production is responsible for **72–78%** of total agricultural emissions, with **cattle production alone contributing to 80%** of emissions from ruminants. These emissions mainly occur in the form of **methane and nitrous oxide**. Although methane remains in the atmosphere for a shorter time than carbon dioxide, it is significantly more potent and is estimated to account for **23–40% of total warming emissions**.”

The report clearly states that **animal food systems**, particularly involving **cattle, sheep, and pigs**, are among the **largest emitters of greenhouse gases**, and these emissions are expected to increase with the expansion of industrial livestock production.

A key driver of these high emissions is the production of **animal feed**, which is estimated to account for **around 55% of total agricultural emissions worldwide**.

Scientific research now clearly outlines the **climate intensity of the global food system**, which:



“From fertilizer production to food storage and packaging, it is responsible for **approximately one-third of all human-induced greenhouse gas emissions.**”

It is therefore evident that the **current food system** has a **detrimental impact on both the climate and the environment**, contributing significantly to pollution and greenhouse gas emissions. This status quo also raises **serious human rights concerns**.

One critical dimension is the **growing threat of antimicrobial resistance (AMR)**.

As studies show:

“In both Poland and globally, the use of pharmaceutical substances in agricultural production is on the rise. The main issue is the lack of control over the sale and dosage of these substances in feed (...) Irrational use of antibiotics has led to the emergence of drug-resistant bacterial strains, against which even last-resort antibiotics are no longer effective. Bacteria exposed to antibiotics develop resistance mechanisms through various metabolic pathways and can pass resistance genes to future generations, as well as between different bacterial species. The excessive and often unjustified use of antibiotics, improper dosing, and premature termination of antibiotic treatments have significantly contributed to the development of bacterial resistance.”

### **C. Strategic inconsistency with EBRD goals and Article 13 of the Agreement Establishing the European Bank for Reconstruction and Development**

This investment contradicts the EBRD’s Green Economy Transition Strategy (GET) and its commitment to the Paris Agreement and the EU Green Deal.

Financing the expansion of fast food chains that depend on factory farming undermines public trust in sustainable development and responsible finance.



Moreover, Article 13 of the Agreement Establishing the European Bank for Reconstruction and Development, regulating on matters of additionality, states that “*the Bank shall not undertake any financing, or provide any facilities, when the applicant is able to obtain sufficient financing or facilities elsewhere on terms and conditions that the Bank considers reasonable*”. Investing in the second-largest fast-food franchise in the world appears to contradict the bank's purpose, as expressed in Article 13, and does not demonstrate any additionality.

### ***The Polish context***

Rex Concepts already operates 40+ Burger King and Popeyes locations in Poland and plans to expand to 180+ outlets by 2031. These restaurants often target second-tier cities and shopping malls, undermining local food systems, health equity, and dietary education. At the same time, small- and medium-scale farms in Poland are being displaced by concentrated, low-cost supply chains linked to fast food operations.

### **D. Financially unworthy investment**

#### ***Financial troubles***

Burger King, despite being one of the largest fast-food chains in the world, has [consistently shown](#), in recent years and [especially in the US market](#), signs of a failing enterprise.

#### ***Rising vegetarianism and dietary habits in Europe***

The business model Burger King and Louisiana Popeyes are proposing is one that is financially unworthy, due to the growing awareness about the devastating impacts of the climate crisis among people all around the world, including in Central and Eastern Europe. This awareness is leading [an increasing number of people](#) to opt for alternative, plant-based, and climate-friendly diets that are antithetical to what Burger King and Louisiana Popeyes currently offer, therefore making them business models unworthy of being invested in.



### ***Our request to EBRD***

We urge the EBRD to:

- 1. Postpone the June 25 vote pending a full health and environmental impact assessment involving civil society from Poland and the wider CEE region.**
- 2. Reject the investment in Rex Concepts SA as incompatible with EBRD's public health, sustainability, and climate commitments.**
- 3. Redirect public development funding toward:**
  - Plant-based innovation,
  - Public procurement reform,
  - Agroecological, inclusive and resilient food systems.

We would also like to take this opportunity to reiterate [our position](#) regarding the draft Food and Agribusiness Strategy 2025 of the European Bank for Reconstruction and Development.

Professor Piotr Skubała, biologist, Green REV Institute expert and member of the State Environmental Council at the Polish Ministry of Climate and Environment, wrote in the introduction to our 2023 report Safe and Just. Plant Based Treaty:

*“In 2009, Earth system and environmental scientists put forward the concept of planetary boundaries, which quite precisely defines a 'safe operating space for humanity'. The researchers, led by Johan Rockström of the Stockholm Resilience Centre and Will Steffen of the Australian National University, identified nine 'Earth's resilience boundaries', crucial for the duration of life on Earth. They pointed out that crossing even one of them could trigger sudden, non-linear, and irreversible environmental change on a global scale.*

*At the time the concept was proposed — directed at policymakers and all of us — three of the nine boundaries had already been exceeded. By the end of 2023, an update to the planetary*



*boundaries showed that six out of nine have now been breached. These include biosphere integrity (biodiversity loss), disruption of biogeochemical flows, and the introduction of novel entities, which are in the high-risk 'red zone'. Three more – climate change, land system change (deforestation), and freshwater change – are in the uncertainty or 'yellow zone'.*

*Professor Johan Rockström commented: “If transformation does not occur in time, irreversible tipping points and widespread impacts on human well-being are most likely unavoidable. Avoiding this scenario is of paramount importance, provided we want to ensure a safe and just future for current and future generations.”*

*In a separate 2019 global appeal signed by nearly 13,000 scientists, the World Scientists' Warning of a Climate Emergency, the authors clearly called for a profound transformation of the food system. Among their key recommendations:*

*“A predominantly plant-based diet and a concomitant reduction in global consumption of animal products, especially from ruminants, can improve human health and significantly reduce greenhouse gas emissions (including methane).”*

*They emphasized that such a shift would free up land to grow food directly for human consumption (rather than for animal feed), and allow some pastureland to be restored through natural climate solutions. They also stressed the role of regenerative practices such as minimum tillage, which increases soil carbon and protects ecosystems.*

*Never before in human history have we been confronted with a challenge of such scale and urgency. Never before have we faced so many scientifically grounded warnings. How many more letters, reports, and appeals from the global scientific community will it take for political and financial institutions to take meaningful action? Will a full and just reform of the food system toward plant-based, climate-resilient diets finally be among them?”*

*The EBRD has a critical role to play in leading the climate transition and setting an example for just and science-based transformation. As the world — including Europe — faces escalating*



*challenges linked to the climate emergency and its cascading effects on health, ecosystems, economies, and global stability, it is imperative that all public institutions align their investments accordingly.*

*We note that the EBRD's draft Food and Agribusiness Strategy 2025 includes some references to sustainability. However, these are insufficient and fail to meaningfully address one of the largest and most harmful sectors: animal agriculture, including meat, dairy, and egg production.*

*The strategy does not commit the Bank to ending its support for animal agriculture. While it mentions alternative proteins, it does not exclude or phase out funding for animal production-based projects.*

*Historically, the EBRD has invested heavily in agribusiness — including meat, dairy, and animal production — as well as in related food processing. In 2023 alone, the Bank committed a record €13.1 billion to various projects, with a significant portion directed to agribusiness, including animal-based farming. Moreover, the EBRD has continued to fund the modernisation and increased productivity of agriculture across Central and Eastern Europe and Central Asia, including projects explicitly supporting meat and dairy industries.*

*By continuing to support the animal agriculture sector, the EBRD is actively financing one of the primary drivers of climate breakdown, biodiversity loss, and public health crises, second only to fossil fuels.*

*We urge the EBRD to: take these warnings seriously, acknowledge the overwhelming scientific consensus, and fully commit to shifting investment away from animal-based food systems and towards truly sustainable, plant-based alternatives that align with the planetary boundaries and a just transition.*





## Executive Summary

Green REV Institute, experts and 75 CSOs strongly oppose the European Bank for Reconstruction and Development's (EBRD) proposed equity investment of USD 46.09 million in Rex Concepts SA, a company expanding Burger King and Popeyes fast food operations across Central and Eastern Europe.

The expansion of industrial fast-food chains supported by public finance poses a direct threat to climate, public health, biodiversity, and small-scale food systems. The planned investment contradicts the EBRD's stated commitments under the Green Economy Transition Strategy (GET), the Paris Agreement, and the EU Green Deal.

The EBRD's continued investment in the meat and dairy industries reinforces a climate-destructive, health-damaging, and biodiversity-eroding system, second only to fossil fuels in terms of global impact.

Yours sincerely,

***Green REV Institute & Signatories***

## Experts:

1. prof. nadzw. dr hab. inż. Tadeusz Pomianek, Prezydent Wyższej Szkoły Informatyki i Zarządzania w Rzeszowie
2. Dr hab. Joanna Hańderek Prof. of the Jagiellonian University
3. dr. Sylwia Spurek, former Member of the European Parliament (2019-2024) and Deputy Human Rights Commissioner of Poland (2015-2019), attorney-at-law
4. dr hab. Anna Kozajda, prof. IMP, Head of Biological Safety Unit (Department of Chemical Safety Nofer Institute of Occupational Medicine)



### **Civil Society Organisations:**

1. Safe Food Federation
2. “W Imię Zwierząt” Foundation
3. Sinergia Animal
4. International Accountability Project
5. Stop Financing Factory Farming Coalition
6. Oyu Tolgoi Watch
7. Rivers without Boundaries Mongolia
8. “Our Ombudsman” Initiative
9. “Halo! Tu Fauna” Iga Woźniak
10. Association 9dwunastych
11. Foundation Akcja Demokracja
12. Inicjatywa Akcja Uczniowska
13. Association BoMiasto
14. Foundation Compassion in World Farming Polska
15. Dolina Bawole Serce
16. Foundation Earth Day Everyday
17. ECO EDU kids
18. Ekowyborca
19. Federacja Wegan dla Zwierząt
20. Foodsharing Polska
21. Foodsharing Toruń
22. Foundation “Ekopotencjał – Przestrzeń Możliwości”
23. Foundation Aquila
24. Foundation Centrum Edukacji Baza
25. Foundation Chlorofil
26. Foundation To Proste
27. Foundation Klub Myśli Ekologicznej



28. Foundation Lambda Polska
29. Foundation MARE
30. Foundation Perspektywa
31. Foundation Prawnej Ochrony Zwierząt Lex Nova
32. Foundation ProVeg Poland
33. Foundation Psubraty
34. Foundation Rething
35. Foundation Rzecz Społeczna
36. Foundation Szkatułka
37. Foundation Zielone Światło
38. Foundation Zwierzęta Niczyje
39. Inicjatywa Gdańsk bez granic
40. Grupa Społeczni Opiekunowie Drzew - Toruń
41. invECO
42. Istota
43. Kolektyw Przełom
44. Kongres Ruchów Miejskich
45. Miastozdzczenie
46. Inicjatywa Mikołów - Roślinne Yeah
47. Młodzieżowy Strajk Klimatyczny
48. Foundation Oficyna 21
49. Podróże z Pazurem
50. Inicjatywa Polska Dla Zwierząt
51. Foundation Przestrzeń do życia
52. Foundation Rodzic w Mieście
53. Foundation Rodzice dla Klimatu
54. Inicjatywa Roślinna Strona
55. Inicjatywa RUCH zaNIEdbani



56. Śląski Ruch Klimatyczny
57. Społeczna Straż Ochrony Zieleni Szczecina
58. Association Mężczyźni Przeciw Przemocy
59. Association Protest Porszewice
60. Association "Nasz Bóbr"
61. Association Jestem na pTAK!
62. Association Kraków dla Mieszkańców
63. Association LUWIA
64. Association na rzecz Azylu dla Świń Chrumkowo
65. Association Przyjaciele Kubusia
66. Association Równość
67. Association Stop Stereotypom
68. Association Tarnowska Rospuda
69. Foundation "W imię Zwierząt"
70. Association Wawelska Kooperatywa Spożywcza
71. Wagateka
72. Inicjatywa Wiosna bez Barrier
73. Foundation Reaktyw
74. Association Społeczno - Oświatowe Gminy Międzyrzec
75. Foundation Ludzie z Natury