

# Call for Evidence on the Fur Sector in GB

## Department for Environment Food & Rural Affairs

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### Evidence submission by Respect for Animals

June 2021

#### Introduction

Each year tens of millions of animals are killed just for their fur. This fur comes from two sources, either from animals trapped in the wild or from fur factory farms. Both of these are effectively banned in the UK.

At various times in our history fur has been seen as a necessity, a currency, traded commodities, luxury, marks of rank and position. In the middle ages, the demand for fur in Europe was enormous. King Henry V of England wore a robe made from an incredible 12,000 squirrels and 80 ermine. Such was the demand that many areas of Europe were 'trapped out' and the fur dealers looked to North America to supply this grotesque market. The last beaver was killed in Britain by 1526, partly due to the value of its fur.<sup>i</sup>

Today, fur is no more than an unnecessary fashion commodity.

Respect for Animals is clear that killing animals for their fur is cruel and that there are many readily available alternatives to fur, in whatever way it is used. In order to be a world leader in animal welfare the UK should urgently seek to ban the import and sale of real fur.

Different types of fur import bans have been successfully implemented elsewhere. There is an EU-wide ban on the import of domestic cat and dog fur as well as the products (including fur) from commercial seal hunts, which has been adopted into British law following the UK's exit from the European Union. Also, many US states are likely to follow California in banning the sale of real fur. Israel has just announced a ban on the sale of real fur products, becoming the first country to do so.

There is now a golden opportunity for the UK to end the glaring hypocrisy of allowing the sale of real fur while banning the main methods of obtaining fur. In this submission we shall expand on the need for a UK fur trade ban.

#### Fur farming is inherently cruel

Approximately 85% of fur sold globally comes from factory farming. All fur farms are intensive factory farms, where animals are kept at high density in small wire cages. No cage-free fur farm exists, because this would be impractical and economically unviable.<sup>ii</sup>

Mink account for the largest share of global fur production, followed by foxes (red (silver) and arctic). The animals are slaughtered by gassing (mink) or electrocution (fox). Smaller

numbers of other species are also factory farmed for fur, including chinchilla, raccoon dog, sable, ferret and coypu.<sup>iii</sup>

Mink and fox are still essentially wild animals – a fact recognised as long ago as 1989 when the UK's Farm Animal Welfare Council (FAWC) issued a press notice disapproving of mink and fox farming and expressed its concern over 'the keeping of what are essentially wild animals in small barren cages.'

In fact, FAWC was very clear in its attitude towards fur farming. In the covering letter to the Ministry of Agriculture, Fisheries and Food it said: 'One of the clear objects of the (press) statement is to give a clear warning that FAWC does not see fur farming as an acceptable alternative enterprise as currently practised. We have decided against drawing up a welfare Code for mink and fox farming to avoid giving it the stamp of approval which a government-backed Welfare Code would imply.'<sup>iv</sup>

Many of the conclusions reached by FAWC were reinforced by the European Commission's Scientific Committee on Animal Health and Animal Welfare (SCAHAW) in its comprehensive report of 2001 (The Welfare of Animals Kept for Fur Production). Its main conclusion was that 'current husbandry systems cause serious problems for all species of animals reared for fur'. Sadly, the conditions in fur factory farms remain the same as in 2001 and the same 'serious' welfare problems exist today as they did then and before.<sup>v</sup>

Mink are solitary by nature but are caged in close proximity to each other and denied access to swimming water despite being semi-aquatic. When free, they fiercely defend territories.

In the wild, foxes roam over large areas and live in complex social groups.

Respect for Animals has published a comprehensive scientific report which explains that mink and fox are still essentially wild animals and, being carnivores and predators, they are unlike other types of domesticated farm animals.<sup>vi</sup>

The fear of humans in undomesticated animals as well as the inherent, poor, welfare they suffer makes them fundamentally unsuitable for farming. The fur farming of mink and foxes is therefore in contravention of European Council Directive 98/58/EC: '*No animal shall be kept for farming purposes unless it can reasonably be expected, on the basis of its genotype or phenotype, that it can be kept without detrimental effect on its health or welfare*'.<sup>vii</sup>

Fur farming is also in contravention of the Council of Europe Recommendation Concerning Fur Animals: '*No animal shall be kept for its fur if: a. the conditions of the Recommendation cannot be met, or if b. the animal belongs to a species whose members, despite these conditions being met, cannot adapt to captivity without welfare problems*'.<sup>viii</sup>

The animal welfare standards applied to traditional, domesticated farm animals cannot be met in fur farms. The welfare failures of even so-called 'best practice' fur farming are further examined below in relation to fur trade certification schemes.

## **Fur trapping is inherently cruel**

Across North America and Russia, leghold traps cause untold misery and suffering to millions of wild animals every winter. Once caught, the animals go to great lengths to escape, even breaking teeth as they bite the steel trap. Sometimes they chew off their own trapped limbs.

Animals can be left for days until the trapper returns to kill them. Undercover footage from Respect for Animals shows trappers killing their quarry by stamping or kneeling on them, crushing their ribcages in order to protect the pelt.<sup>ix</sup>

Traps are indiscriminate, catching the first animals that triggers them. These can include endangered species and family pets, referred to by trappers simply as 'trash'.

The leg-hold trap, or gin trap, has been banned in the UK since the 1950s, but the same type of trap is still commonly used in the USA, Canada and Russia and the fur from animals caught in them is still legally imported into the UK.

As early as 1863, Charles Darwin condemned the leg-hold trap for its cruelty:

*"It is scarcely possible to exaggerate the suffering thus endured from fear, from acute pain, maddened by thirst, and by vain attempts to escape...Some who reflect upon this subject for the first time will wonder how such cruelty can have been permitted to continue in this age of civilization; and no doubt if men of education saw with their own eyes what takes place under their sanction, the system would have been put an end to long ago."*<sup>x</sup>

A British initiative in the mid-1990s to label fur from animals caught in steel-jawed leghold traps was sadly withdrawn at the last minute under pressure from Canada. The failure of this popular and logical measure indirectly led to the EU initiative which attempted to ban the import of furs from species caught in leghold traps and succeeded in banning the use of these cruel traps throughout the EU. Under immense pressure from a fur trade directed lobby, the import ban was diverted into a process culminating in the Agreement on International Humane Trap Standards (AIHTS).

Respect for Animals has serious concerns with regard to the AIHTS. Firstly, the use of the word 'humane' is unacceptable and misleading.

An examination of the trap testing procedures shows they do not stand up to scrutiny. With regard to killing traps, for most species the time limit to death is set at 5 minutes. This is, by any measure, not humane and has been rejected by all objective scientists and veterinarians who have expressed an opinion.

Restraining traps are judged by a set of injuries incurred during the trap testing procedure. A trap will be passed even if up to 20 per cent of animals tested have sustained injuries. These include fracture, spinal cord injury, amputation, severe internal organ damage.

As can be seen, the word 'humane' lacks any credibility in relation to the reality of AIHTS. The discussions when AIHTS was brokered were criticised in a House of Lords report (1996), which concluded:

*'The Working Group's unrepresentative composition and the secretive nature of its proceedings are matters of grave concern. Professional experts in animal welfare and behaviour are almost entirely lacking from the membership.'*<sup>xi</sup>

At the time of the agreement, strong objections were raised by leading European veterinary and welfare experts, as well as by the European Parliament (2005)<sup>xii</sup> and in a report by Carlos Pimenta MEP as Rapporteur for the Committee on the Environment, Public Health and Consumer Protection (1997):

*'The proposed International Agreement fails dramatically in terms of its animal welfare... Accession to an agreement that would perpetuate the use of leghold traps and may actually classify some as 'humane' is totally unacceptable.'*<sup>xiii</sup>

Secondly, the agreement is effectively a fur trade charter, having the outcome of endorsing the trade in wild animal fur caught by clearly cruel methods. The facilitation of the trade in trapped fur provided by AIHTS makes Britain complicit in the idea that it is acceptable to inflict long, traumatic and painful deaths on wild animals for their fur.

This is clearly not consistent with public opinion in the UK, where the British public strongly rejects the methods of production of the fur trade, including trapping.

For decades there has been widespread opposition to the inherent cruelty of fur trapping, including from the current Prime Minister. In June 1995, an article by Boris Johnson in the Daily Telegraph supported a proposed European Union-wide import ban on all fur products from countries still using leg-hold traps. The piece sharply criticised the attempts by fur trade lobbyists to justify the trade as 'humane', reminiscent of similar attempts by the fur industry today in schemes such as WelFur and FurMark, as well as public relations drives around 'natural' fur and 'sustainable' fur.

For example, Mr Johnson writes: 'It is suggested that a 'humane' trap would allow limb dislocation, severed toes, tendons and ligaments, while somehow falling short of encouraging auto-amputation. It sounds like nonsense. It is nonsense.'

The article concludes: '...there can be no compromise. You cannot produce a humane leg-hold trap. You might as well research the possibilities of non-wet water. You can put rubber on the teeth of the thing. You can adjust the mechanism so the jaws do not clamp entirely shut. The result will be the same. Even if they do not mutilate themselves- and they will- the animals will freeze and starve. As long as Canada, the US and Russia continue to use these traps, there is no logical reason why the ban should not come into force.' (Boris Johnson, Daily Telegraph, 19 June 1995: 'Cruel deception brings cold comfort for fur campaigners')

## **The UK has banned fur farming for 20 years**

Fur farming was banned in the England and Wales in 2000, and in Scotland and Northern Ireland in 2002. The bans were achieved on the basis that fur farming is at odds with public morality.<sup>xiv</sup>

The ban was the result of a comprehensive consultation process, in which the strength of public opposition to the fur industry was established and the inability of fur farming to meet the most basic animal welfare obligations was scientifically recognised.<sup>xv</sup>

*It is hypocritical to allow the sale of real fur since the main methods of productions are banned for their cruelty.*

The UK ban on fur farming is a strong and successful piece of legislation, ensuring that the overwhelming moral objection by the British public to fur farming is protected. The UK ban has been and continues to be an inspiration for similar moves across Europe.

Indeed, there is momentum now in many countries towards banning fur farming, with more bans implemented every year. Britain, whose ban was the very first, has seen its international reputation enhanced as a result. By banning fur farming Britain was seen as a global leader in animal welfare. By banning fur sales, we can do so again.<sup>xvi</sup>

## **The fur industry has suffered a chronic decline in the UK**

The fur industry in the UK has been in serious decline since the mid-1980s. Today, in terms of the UK fashion and retail sector, it is insignificant. This decline has come about as the public and retail outlets have learnt the truth about where fur comes from. The fur industry is one that belongs in the past, both morally and economically.

The following indicators trace the fur trade's decline in the UK:

-In the 1980s all Debenhams stores used to have a luxury fur department and the British Fur Trade Association frequently used to take out full-page advertisements in national publications listing their retail members. One of these in the Sunday Times Magazine (16 October 1983) listed 174 outlets. Today only a handful remain.

-The Hudson Bay Company had been operating in London since 1668, gaining a Royal Charter and operating one of the fur trade's main auction houses. All this came to an end as the appetite for fur in the UK diminished and the Hudson Bay site was demolished in 1987.

-The UK fur trade used to have its own monthly glossy magazine 'Fur Review' but it ceased publication in May 1989. Reflecting the demise of the trade in the UK the magazine shrank as the years passed with its final edition made up of just 34 pages. This contrasts with the April 1980 issue of 110 pages. One of the regular features of Fur Review was its 'Recommended Stockists' section. In 1980 there were 63 fur categories listed that could be supplied by 320 companies. By the last issue, only 24 categories appeared in what was now called 'Market Place' and these included Insurance, listing a mere 43 phone numbers.

The biggest names in fashion have also stopped using real fur, including Gucci, Prada and Armani.

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Evidence submission from Respect for Animals, PO Box 6500, Nottingham NG4 3GB

[info@respectforanimals.org](mailto:info@respectforanimals.org),

Tel: 0115 9525440

Respect for Animals is the UK administrator of the international Fur Free Retailer programme. As can be seen from [FurFreeRetailer.com](http://FurFreeRetailer.com), the overwhelming majority of high street retailers are official Fur Free Retailers, having signed the fur-free pledge. Of those that do not feature, almost all have their own internal no fur policy.<sup>xvii</sup>

On 25 June 2021, retail giant Canada Goose announced plans to end the use of real fur in all its products. The company has been notorious for using coyote fur trims on its parka coats, taken from animals caught in cruel leghold traps in North America. In a major change of policy, the company said: "Canada Goose will end the purchase of fur by the end of 2021 and cease manufacturing with fur no later than the end of 2022."<sup>xviii</sup>

In 2019, it was confirmed that the Queen would no longer use any real fur in her new outfits, with Senior Dresser Angela Kelly explaining that this was due to changing attitudes in Britain.

Statistics from the UK Government's Statistical Service provide further, concrete, evidence of the fur trade's decline in Britain. In 1980 the total of fur products manufactured in the UK was £91 million and the total turnover of business in the UK fur industry was £119 million. This had declined massively to £2.5million and £3.9 million respectively and by 2007, the Statistical Service ceased to publish this data as it had become insignificant.<sup>xix</sup>

In 2019, £56.4 million worth of fur articles were imported into the UK. However, of this, £35.2 million worth was exported.<sup>xx</sup> The UK has largely become a trading post for fur products.

It is clear that the fur trade in the UK has diminished significantly in the past 40 years. Any suggestion that a fur sales ban would cause major job losses is false. The net worth of fur articles imported into the UK in 2020 was a mere 0.0067% of total net imports i.e. insignificant.

This, however, does not diminish the need for a trade and sales ban of real fur.

The amount of fur still in the UK market is unacceptable, the 2019 statistics suggesting around £20 million worth was imported into the UK. Given the means of fur production are banned in this country, the inherent animal welfare and environmental failures in the fur industry and inadequacy of any certification and labelling scheme (as outlined in this report) the government must take action to end the real fur market in the UK.

The killing of animals for their fur can be likened to commercial whaling. Both are inherently cruel and both provide products for which there are many alternatives. In the case of the fur trade, the products are also on the luxury and trivial end of the scale of consumer demand. The UK has supported bans on the killing of whales as well as commercial seal product imports. Banning the import and sale of real fur would be a consistent addition to our reasonable but much needed animal welfare legislation. The California state fur sales ban and the Israel fur trade ban are key examples of governmental bodies acting successfully on these grounds.

## **Real fur sold as fake: we need a fur trade and sales ban, not fur labelling**

There is now ample evidence that real fur is being miss-sold at UK retail outlets – both deliberately and in error.

Media investigations have shown major High Street and online retailers such as TK Maxx, House of Fraser and BooHoo have sold items containing real fur to consumers who believed the fur they were buying was fake. Retailers who provided evidence to the Environment, Food and Rural Affairs Committee Report (Fur Trade in the UK, July 2018) who confirmed these anomalies all said that their procedures would be reviewed to ensure this serious form fur selling did not reoccur but it is impossible to estimate how large these real fur sales actually are.<sup>xxi</sup>

Real fur items are also frequently now found on sale at markets, often incorrectly labelled or with no label at all. One common item found on sale at these outlets is bobble/pompom hats.

For example, following reports from members of the public Respect for Animals found identical hats sold at different market stalls in the centre of Nottingham for the same cheap price (£10): one with a fake fur bobble, one with a real fur bobble. The only label that both hats contained said '100% acrylic'. It became apparent that many customers had no idea that they were buying products from the cruel fur industry. In this case, Nottingham City Council has a policy which prohibits real fur being sold at its events and, having received evidence, ensured the trader ceased sale of the real fur items.<sup>xxii</sup>

In this case it was only thanks to keen eyed members of the public that this came to light and was dealt with. Respect for Animals has had similar reports of this type of miss-selling happening all over the country for several years now. Over the last five years, real fur has been regularly sold as fake at markets.

Respect for Animals and our supporters have regularly reported the miss-selling of real fur as fake to Trading Standards. The response has been inconsistent, with Trading Standards offices in many areas lacking the resources to take action.

Trading Standards measures such as these, on their own, cannot resolve the issue. There is no specific requirement to label real fur products as fur. All existing relevant legislation is confusing and inadequate.

Many consumers have been left under the false impression that the item they are buying is made from fake fur. They should not be expected to question the trader.

Respect for Animals believes that it is unreasonable and impractical for consumers to have to take recourse to unfair trading legislation to protect themselves against being duped into buying the products of the cruel fur trade. The onus cannot lie with individual consumers in this case.



Opinion polls make clear that the British public oppose the fur industry and it should not be left to consumers to take measures to double check the fake fur they believe they are buying is not real.

It is also clear that Trading Standards officers are not able to adequately enforce such laws as there are that relate to the selling of fur and any labelling requirement would similarly not be adequately enforced.

The total failure to protect the consumer by fur industry-led certification schemes such as WelFur and FurMark is examined in detail below.

The case for banning the import and sale of real fur is therefore made even stronger, to protect consumers from buying real fur mistakenly. Such a statutory ban would enable local Trading Standards Offices to take firmer action while focussing the attentions of importers and retailers to ensure their suppliers were not making deliberate or unwitting mistakes.

### **A fur ban has widespread public support**

Data from numerous polling companies shows that a strong majority of British people support a ban on the import and sale of real fur.

A 2014 YouGov poll found that 74% believe the use of animals for fur production is wrong.

Another YouGov poll, conducted in March 2020, found that 93% of the British population never wear fur, or no longer wear it, and the majority (72%) support a ban on the sale of fur in the UK.<sup>xxiii</sup> A poll in 2021 also found that 72% support a UK fur import and sales ban.<sup>xxiv</sup>

A petition on the official parliament website (petition 200888) in 2018, called for a ban on the sale of real fur.<sup>xxv</sup> When the petition closed it had received 109,549 signatures, resulting in a Westminster Hall debate. Not a single MP who spoke in the debate defended the fur industry in the UK, with members from across the political spectrum backing a fur sales ban.<sup>xxvi</sup>

In the most recent parliamentary session, Early Day Motion 267 called for a ban on fur imports. MPs of all parties in parliament signed the motion, which was the second most successful EDM in the whole session.<sup>xxvii</sup>

The Environment, Food and Rural Affairs Select Committee has also examined the fur trade in recent years. Having investigated the fur trade in the UK after evidence emerged of the sale of real fur items described as fake fur, the Committee recommended that Ministers consider an all-out ban on fur sales (for more on real fur sold as fake, please see above).<sup>xxviii</sup>

### **A fur sales/import ban is legally possible and increasingly necessary**

With Britain now outside of the European Union and the single market, which enshrines the principle of free movement of goods, there is a real opportunity for a ban on the import of real fur.



The World Trade Organisation (WTO) has set a precedent for such a ban. Despite opposition from Norway and Canada, the WTO upheld the right of the EU to ban trade in commercial seal products on the grounds of public morality.

The WTO panel explicitly noted that commercial seal hunts pose inherent dangers to animal welfare.<sup>xxix</sup>

In 2014, this was appealed by the same countries but once again the WTO upheld the EU's right to ban trade in seal products.

Indeed, a body of case law has built up, starting with the tuna/dolphin case, as well as the EU import bans on cat and dog fur and commercial seal products. In these cases, the defence of public morality has been used, tested and prevailed. It can therefore be used to introduce further measures where cruel and unnecessary methods are used to kill animals for their fur.

'David Thomas, solicitor with Advocates for Animals, advises:

"Now that the UK has left the EU, clearly there is no impediment under EU free trade rules on the UK introducing a sales and import ban. The UK remains a party to WTO agreements. These are also free trade agreements. However, there are various exceptions to free trade principles under Article XX of GATT, one of the main agreements, as well as under other agreements. The most relevant paragraph of Article XX is (a), which allows a WTO member to prohibit or restrict the trade in goods which offend the morals of its citizens. The measure must be non-protectionist and non-discriminatory in effect and intention.

An important precedent was set by the EU's ban on the import and sale of seal products via Regulation (EC) No 1007/2009. The WTO Appellate Body, upholding its Dispute Settlement Body, confirmed that Article XX(a) was available where the 'public morals' related to concern about animal welfare. The EU ban was justified in principle. In a democracy, parliaments assess where public morals lie. If the UK Parliament concluded that a ban on the trade in fur reflected the morals of the British public, it could rely on Article XX(a). This is provided that the ban was non-protectionist and non-discriminatory in effect and intention - in other words, there would need to be a domestic trade ban as well and the ban would have to apply to all countries. Provided these conditions were fulfilled, I have every confidence that a ban would pass muster at the WTO".

### **The fur industry's certification schemes are not fit for purpose**

The fur industry in Europe has been promoting its WelFur project for more than a decade. WelFur claims to develop on-farm welfare assessment protocols for mink and foxes. However, a report for Respect for Animals by leading academics has examined the WelFur protocols in scientific detail.

The report concludes that WelFur is not able to address the major welfare issues for mink and foxes farmed for fur, the issues associated with inhumane handling and slaughter

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[info@respectforanimals.org](mailto:info@respectforanimals.org),

Tel: 0115 9525440

methods, or the serious inadequacies in current labelling and regulation. The ‘best current practice’ ceiling makes the WelFur scores of limited value and misleading because ‘best current practice’ still represents what the majority of people would consider to be an unacceptable level of welfare. Alternative systems with the potential for higher levels of welfare do not exist for mink and foxes.

The full report can be accessed here: [https://respectforanimals.org/wp-content/uploads/2017/04/WELFUR\\_REPORT\\_WEB.pdf](https://respectforanimals.org/wp-content/uploads/2017/04/WELFUR_REPORT_WEB.pdf)

Respect for Animals is also about to publish a report on the ethics of the fur trade, written by leading academics at the Oxford Centre for Animal Ethics at Oxford University, which also examines the WelFur protocols:

*‘The system of measurement does not absolutely forbid such major harms, so that, for example, the operations are forced to close or individual animals are immediately provided with veterinary treatment. The measurements allow for aggregated assessments across a given “farm” so that some minuses here (even major harms) and some pluses (such as putative enrichments) are allowed to balance themselves out. In practice, this means that some harms, however horrible, can be tolerated so long as the farm scores well on other putative welfare measures. The “WelFur” system is therefore predicated not on individual animal welfare, but aggregating across a variety of factors, some of which may be directly relevant to welfare and others not.*

*‘The absurdity of this system of measurement will be grasped immediately if an offender in UK law charged with animal cruelty sought to defend his or her neglect of one animal on the grounds that others were not neglected. Such defences do not wash in law; still less in moral reasoning.’<sup>xxx</sup>*

The International Fur Federation has now started to promote another scheme: ‘FurMark’, which incorporates WelFur and other debunked schemes around the world under one umbrella.

Whatever the certification scheme, enrichment of existing housing systems is not sufficient to address the serious welfare problems inherent in cage systems (for trapped fur welfare failures, please see above). The use of undomesticated animals by the fur industry means that fear of humans and difficulties in handling and management would present insurmountable obstacles to the adoption of more extensive systems. It is therefore impossible for the needs of mink and foxes to be met by the fur industry.

Fur farming bans, such as the one in the UK, are the only viable solution to the serious welfare concerns caused by fur factory farming, including FurMark approved fur.

As more countries ban fur farming on the grounds of animal welfare and public morality, and with the collapse of the Danish fur industry after serious Covid outbreaks on fur farms, the fur industry is becoming ever more dependent on China as a producer of factory farmed fur. The quality of animal welfare is so poor that Chinese farms are not even a part of the

FurMark certification scheme. However, there is a similar Chinese scheme called ‘Good4Fur’, which the fur trade hopes to include in FurMark in the future.<sup>xxxix</sup>

The readiness of the fur industry to invent certification schemes for existing animal welfare failures is an example of the fur trade using public relations tactics to hide the truth of fur production.

### **Fur industry propaganda: similarities with oil and tobacco**

The fur industry is represented by various trade bodies which can be compared to tobacco industry lobbyists or sponsored climate change deniers, both of which are narrow, self-interest groups whose aims are to defend their sponsors’ practices and stave off legislation or regulation aimed at limiting their damaging activities and protecting the public.

Indeed, many of the fur trade’s representatives have direct experience defending such industries with dismal public reputations.<sup>xxxix</sup>

In 2019 a fur trade podcast featured a discussion with the International Fur Federation’s (IFF) CEO alongside the CEO of the IFF’s Americans region, in which the latter boasted of his background working for ‘big tobacco’, describing it as another “high contentious” industry and adding “it was a natural transition from tobacco to come over to fur”.<sup>xxxix</sup>

The current CEO of the British Fur Trade Association (BFTA) has a similar background having previously represented the Tobacco Manufacturers Association.<sup>xxxix</sup>

His predecessor however has spoken out about his regret at working for the fur trade and now backs a fur trade ban in Britain. Mike Moser spent a decade as the public face of the fur industry, first at the International Fur Federation and then as chief executive for the British Fur Trade Association.

He said in 2020:

*“It is morally inconsistent to ban the means of fur production in this country but to allow it to be produced elsewhere and then sold in the UK.*

*“The fur trade is under attack because the ordinary person in the street thinks it is no longer acceptable to cage animals for their entire lives and then kill them for a product that only has vanity value.*

*“It is anachronistic. It is an industry out of date. That is why it is having to defend itself more and more.”<sup>xxxix</sup>*

Recent initiatives such as Welfur and FurMark (referred to, above) which have been created by the fur industry as attempts to put a gloss on its cruel practices – can be seen in this context.

The WelFur scheme is being promoted by the fur industry, despite being comprehensively debunked by the report by Respect for Animals: 'The Case Against Factory Farming: A Scientific Review of Animal Welfare Standards and 'WelFur''.

Drawing on the best and most up to date science, the report concludes: 'WelFur is not able to address the major welfare issues for mink and foxes farmed for fur, nor the serious inadequacies in current labelling and regulation'. For more on WelFur, see the section above.

The fur trade is also embarking on a 'greenwashing' campaign.

Considerable resources are being devoted to attach the fur trade to buzzwords such as 'sustainable', in a bid to hijack important trends in politics and fashion and in order to divert attention away from the realities of the industry's environmental impact and animal welfare failures (see below).

Clutching at straws, the fur trade also tries to obscure the main issues by using the 'thin end of the wedge' argument (this is a common fallacy, sometimes called the 'slippery slope fallacy' in which people are asked to believe that, without any evidence, if we take a particular step which in itself doesn't cause a problem, it is nevertheless the first in a series of steps that will lead inevitably to some undesired outcome).<sup>xxxvi</sup>

This is irrelevant: each issue must be judged on its own merits and the case for banning real fur is now overwhelming.

### **Real fur is bad for the environment**

The fur industry is keen to portray an image of fur as a natural, sustainable and environmentally responsible product. However, an examination of the evidence reveals that this is no more than greenwashing of a resource-intensive, highly polluting industry with little regard for its impacts on biodiversity and the environment.

### **CASE STUDY: INDUSTRIAL FISHING OF SAND EELS IN NORTH SEA TO FEED MINK IN DANISH FUR FARMS**

An investigation by Respect for Animals revealed that sandeels in British waters have been regularly taken in huge numbers by Danish trawlers to be used as feed on mink fur farms.

In 2020, the quota for sandeels was doubled from the 2019 figure to 215,863 tonnes and fishing began even while other fishing areas were hit by coronavirus.

Danish fishermen had 94% of the sandeel quota in the North Sea, much of it in British waters. Danish industrial sandeel vessels have stripped on average around 200,000 tons of sandeels from the North Sea annually.

At a key Danish landing site on the Jutland peninsula, at the North Harbour of Hvide Sande, sandeels are landed and processed at a company called Hvide Sande Minkfodercentral (Mink Feed Centre). They are then taken directly to Danish fur farms, making a nonsense of fur breeders' claims that only by or waste products are used to feed their animals. Prior to the Covid-19 outbreak on mink farms, there were many mink fur factory farms in the area.

The environmental impact of industrial sandeel fishing in UK waters is considerable. The RSPB has regularly called for major reductions in the sandeel quotas. Sandeels are a key food source for threatened British seabird populations, including puffins and kittiwakes.

*Many people who care about marine conservation will be shocked that sandeels, a key species for the health of marine ecosystems, are being taken on an industrial scale in British waters for use as feed on cruel Danish fur farms.*

The fur industry has historically had a devastating effect on biodiversity, being responsible for the extinction of some species and the over-exploitation of many others. Hunting and trapping are now regulated in some parts of the world, such that some species are killed at levels that do not pose an imminent threat to the survival of the species. However, such management is not possible in poorly regulated societies and the trade in legal furs makes the trade in illegal furs easier, which continues to threaten species survival.<sup>xxxvii</sup>

The fur industry is responsible for the introduction of several invasive alien species, through deliberate releases as well as escapes from fur farms. For example, the American mink (*Neovison vison*) in Europe poses a threat to many seabird colonies and internationally important populations of ground-nesting birds and is a major contributing factor in the near extinction of the water vole (*Arvicola terrestris*) in the UK, and the decline of the critically endangered European mink (*Mustela lutreola*) across Europe.<sup>xxxviii</sup> Escapees from fur farms continue to be a source of American mink in Europe. Despite regulations requiring fencing and traps around farms, around a quarter of mink caught by hunters in the wild in Denmark are farm-born.<sup>xxxix</sup>

Pollution from fur factory farms often has a devastating effect on local waterbodies,<sup>xi</sup> soil,<sup>xli</sup> and air quality. Ammonia emission per animal from mink houses is at least double that for broiler chickens, due to the high protein requirement of the strictly carnivorous mink and the typical use of open-sided houses on fur farms without sophisticated manure-handling systems.<sup>xlii</sup> Emissions from fur farms can have serious negative effects on the health<sup>xliii</sup> and quality of life of local residents, who frequently report problems with flies and foul odours.<sup>xliv</sup>

The dressing and dyeing of fur involve the use of many toxic chemicals. In terms of land pollution by toxic metals, fur dressing and dyeing is ranked in the top five highest pollution-intensity industries.<sup>xlv</sup> Toxic metals pose a particularly serious problem because they bioaccumulate. Potentially dangerous levels of several hazardous chemicals have been found in fur products (including clothing for children) sold in both Europe and China.<sup>xlvi</sup>

Measured over the life cycle of the product (from production of the raw material to disposal) the environmental impact of a mink fur coat is many times higher than that of a faux fur coat (approximately six to fourteen times higher, depending on the backing material used).<sup>xlvii</sup> The fur industry claims that a fur coat compensates for the difference with a longer lifespan but provides no supporting evidence. The available evidence indicates that the actual lifespan of fur garments is no more than 5-10 years<sup>xlviii</sup> and therefore nowhere near long enough to compensate for the difference in environmental impact.

The recently launched FURMARK® labelling scheme lacks credibility and does nothing to mitigate the environmental impact of the fur industry. The scheme does not currently include any standards for emissions, biodiversity impact, resource / energy use or any other environmental performance measures. Although some parts of FURMARK® (e.g. WelFur and SafeFur) involve third party audits (of animal welfare on fur farms and chemical residues in fur, respectively), the independence of some of these audits is questionable,<sup>xlix</sup> and oversight of the FURMARK® scheme is by the fur industry itself (a steering group of key members of the International Fur Federation's board<sup>l</sup>) thus creating a huge conflict of interest. The

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Evidence submission from Respect for Animals, PO Box 6500, Nottingham NG4 3GB

[info@respectforanimals.org](mailto:info@respectforanimals.org),

Tel: 0115 9525440

scheme standards generally reward the status quo with no requirement to go beyond normal industry practice and basic legal requirements.

### **The fur industry and Covid-19**

Since April 2020, COVID-19 outbreaks have affected more than 400 mink fur farms in Europe and North America, resulting in the culling of over 20 million animals. The crowded, stressful and unhygienic conditions on intensive mink fur farms make them the perfect breeding ground for infectious disease. They also have the potential to create coronavirus reservoirs that could pose a risk to public health and the effectiveness for future vaccines.

Confined to small wire cages, suffering stress and a poor quality of welfare as well as a lack of veterinary care, mink kept on fur farms are highly susceptible to COVID-19. Not only is the virus a disaster for animals, it has also been found to be transmissible back to humans. At present, over 200 human COVID-19 cases in Europe have been linked to mink farms.<sup>li</sup>

In addition to mink, it is known that raccoon dogs are susceptible to coronaviruses. Moreover, red foxes have also been found to have been infected with a SARS-CoV-like virus. Like mink, both these species are farmed for fur in Europe and China; foxes are also farmed for fur in North America.

The seriousness of this should not be overlooked. SARS-CoV-2, the virus that causes COVID-19, can jump back and forth between humans and mink with the potential for the virus to mutate in mink prior to infecting humans. In a 2020 risk assessment, the European Centre for Disease Prevention and Control (ECDC) warned that the spread of SARS-CoV-2 in mink farms could lead to new variants that could compromise the efficacy of a vaccine: “the continued transmission of SARS-CoV-2 in mink farms may eventually give rise to other variants of concern”.<sup>lii</sup>

Denmark’s Statens Serum Institut confirmed on Monday 28 June 2021 confirmed that the Danish cluster 5 mutation would in fact have impacted vaccine efficacy: *“The new study concludes that the combination of spike mutations in cluster-5 viruses led to a certain significantly increased degree of antibody resistance in some individuals after covid-19 infection. The findings confirm the preliminary studies in November 2020.*

*“After the study of cluster-5 viruses, some cluster-5 mink viruses continued to mutate into six amino acid changes in the spike protein. The additional mutated cluster-5 virus variant has not been studied, but shows that the minquarters continued to mutate through infected mink.”<sup>liii</sup>*

On Wednesday 9 June 2021, the European Parliament adopted a new EU Biodiversity Strategy, which contained a specific reference to fur farming and Covid (line 70), which reads: *“Notes that fur production, which involves the confinement of thousands of undomesticated animals of a similar genotype in close proximity to one another under chronically stressful conditions, can significantly compromise animal welfare and increases their susceptibility to infectious diseases including zoonoses, as has occurred with COVID-19 in mink”*.<sup>liv</sup>

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Evidence submission from Respect for Animals, PO Box 6500, Nottingham NG4 3GB

[info@respectforanimals.org](mailto:info@respectforanimals.org),

Tel: 0115 9525440



## Conclusion

Now is the perfect opportunity for Britain to ban the import and sale of real fur and establish itself as the global leader on animal welfare.

It is incumbent on civilized societies to take action where they can to remedy issues of widespread, preventable animal cruelty.

The fur bans in California and most recently Israel have set precedents and show the bans are not just possible and legal, but attract public support and are morally correct. The numerous certification schemes promoted by the fur industry are not fit for purpose, working only to reward already existing failures in animal welfare and damage to the environment.

We must end the hypocrisy of allowing the sale of items of which the production is banned. Further attempts to regulate or improve regulations would be an inadequate response. Only a ban on the import and sale of real fur can resolve the serious issues caused by the fur industry.

While the UK fur trade has undergone a significant decline over the last four decades and is now economically irrelevant to this country, there remains an overwhelming case for a ban on the import and trade in real fur.

Any and all imports of fur have involved the cruel treatment and suffering of animals that should not be tolerated by a civilised society.

A ban on the import and trade in fur would address:

- The moral case for a ban - supported by a huge majority of people in the UK
- The hypocrisy that currently exists by allowing trade in products the UK has banned production of due to the cruelty involved
- Consumer protection: helping to ensure that people are not buying real fur, thinking it to be fake.

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<sup>i</sup> Peter Verney, *Homo Tyrannicus: A History of Man's War Against Animals*, 1979, page 41.

<sup>ii</sup> [Fur farming | Respect for Animals](#)

<sup>iii</sup> Harris S, Pickett H, *The Case Against Fur Factory Farming: A Scientific Review of Animal Welfare Standards and 'Welfare'*, 2015, [WELFUR REPORT WEB.pdf \(respectforanimals.org\)](#)

<sup>iv</sup> Farm Animal Welfare Council Disapproves of Mink and Fox farming', Press Notice, 4 April 1989, p. 1.

<sup>v</sup> SCAHAW (2001), *The Welfare of Animals Kept for Fur Production*, Report of the Scientific Committee on Animal Health and Animal Welfare adopted 12-13 December 2001.

<sup>vi</sup> [WELFUR REPORT WEB.pdf \(respectforanimals.org\)](#)

<sup>vii</sup> [EUR-Lex - 31998L0058 - EN - EUR-Lex \(europa.eu\)](#)

<sup>viii</sup> [Rec fur animals E 1999 \(coe.int\)](#)

<sup>ix</sup> [Undercover footage | Respect for Animals](#)

<sup>x</sup> Charles Darwin, *Gardeners' Chronicle and Agricultural Gazette*, 1863

<sup>xi</sup> House of Lords Select Committee on the European Communities, *Leghold Traps*, 7 May 1996

<sup>xii</sup> [Debates - Humane trapping standards - Wednesday, 16 November 2005 \(europa.eu\)](#)

<sup>xiii</sup> [Debates - 12. Leghold traps and pelts - Tuesday, 18 June 1996 \(europa.eu\)](#)



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- xiv England and Wales: [www.legislation.gov.uk/ukpga/2000/33](http://www.legislation.gov.uk/ukpga/2000/33); Scotland: [www.legislation.gov.uk/asp/2002/10](http://www.legislation.gov.uk/asp/2002/10); Northern Ireland: [www.legislation.gov.uk/nisi/2002/3151/](http://www.legislation.gov.uk/nisi/2002/3151/)
- xv Elliot Morley, Hansard (15 May 2000) (London: HMSO, 2000) Vol. 350, No. 99, p. 76
- xvi [A Guide To Fur Bans Around The World | Respect for Animals](#)
- xvii [www.furfreeretailer.com](http://www.furfreeretailer.com)
- xviii [Canada Goose goes fur-free | Respect for Animals](#)
- xix Business Monitor Quarterly Statistics PQ4560 (Fur Goods), First quarter 1986, HMSO; Business Monitor PAS4560 (Fur Goods), 1991, Central Statistical Office; Product Sales & Trade- Dressing & Dyeing of Fur/Article of Fur (1994-2007), Office for National Statistics.
- xx UK Trade Info, [Overseas trade data table - UK Trade Info](#), (22 June 2021), Codes included: 43 - Furskins and artificial fur; articles thereof (with exception of 4304 - Artificial fur and articles thereof (excl. gloves made of leather and artificial fur, footwear and headgear and parts thereof.
- xxi [Fur trade in the UK \(parliament.uk\)](#)
- xxii [Fur Free Markets | Respect for Animals](#)
- xxiii [Survey Report \(yougov.com\)](#)
- xxiv [OmFur Trade.wyp \(yonderconsulting.com\)](#)
- xxv [Ban the sale of animal fur in the UK. - Petitions \(parliament.uk\)](#)
- xxvi [Fur Trade - Monday 4 June 2018 - Hansard - UK Parliament](#)
- xxvii [Real fur imports - Early Day Motions - UK Parliament](#)
- xxviii [Fur trade in the UK \(parliament.uk\)](#)
- xxix [WTO | dispute settlement - the disputes - DS400](#)
- xxx Andrew Linzey and Clair Linzey, 'An Ethical Critique of Fur Factory Farming and so-called WelFur', 2021.
- xxxi [The International Mark of Responsible and Sustainable Natural Fur by wearefur - issuu](#) page 98, see also: [China-Fur-Report-7.4-DIGITAL-2.pdf \(respectforanimals.org\)](#) page 24
- xxxii [The Fur Industry: a corporate overview – Corporate Watch](#)
- xxxiii Fur Talks podcast, 4 September 2019, ['Folks just don't like products banned... we don't like to be told what to do' - Mike Brown, CEO of Americas Region representing the entire fur industry in the US. • We Are Fur](#)
- xxxiv [The Fur Industry: a corporate overview – Corporate Watch](#)
- xxxv Nada Farhoud, 8 September 2020, [Ex-boss of British Fur Trade pleads 'ban it' after cruelty reduced him to tears - Mirror Online](#),
- xxxvi [Slippery slope argument | logic | Britannica](#)
- xxxvii Tapper, S. and Reynolds, J. (1996) The wild fur trade: Historical and ecological perspectives. In: V.J. Taylor and N. Dunstone (eds.) *The Exploitation of Mammal Populations*. Springer, Netherlands (pp. 28-44).
- xxxviii Global Invasive Species Database (2021) Species profile: *Neovison vison*. Downloaded from <http://www.iucngisd.org/gisd/speciesname/Neovison+vison> on 21-06-2021.
- xxxix Pagh, S., Pertoldi, C., Petersen, H.H., Jensen, T.H., Hansen, M.S., Madsen, S., Kraft, D.C.E., Iversen, N., Roslev, P. and Chriel, M. (2019) Methods for the identification of farm mink escapees in feral mink (*Neovison vison*) populations. *PLoS ONE*, 14(11): e0224559. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0224559>
- xl Betts, R.A. (2018) *Cyanobacteria presence in Four Lakes in the Halifax Regional Municipality (HRM), Nova Scotia*. Dalhousie University, July 2018. <https://dalspace.library.dal.ca/bitstream/handle/10222/74136/Betts-Rebecca-MASC-CIVL-July-2018.pdf?sequence=1&isAllowed=y> (accessed 22.06.21)
- xli Pietila, M., Lahdesmaki, P., Pietilainen, P., Ferm, A., Hytonen, J. and Patila, A. (1991) High nitrogen deposition causes changes in amino acid concentrations and protein spectra in needles of the Scots pine (*Pinus sylvestris*). *Environmental Pollution*, 72: 103-115.
- xlii Pedersen, S. and Sandbol, P. (2002) Ammonia emission and nitrogen balances in mink houses. *Biosystems Engineering*, 82(4): 469-477.
- xliii Smit, L.A.M., Hooiveld, M., van der Sman-de Beer, F., Opstal-van Winden, A.W.J., Beekhuizen, J., Wouters, I.M., Yzermans, C.J. and Heederik, D. (2013) *Occupational and Environmental Medicine*, published online first: [23 August 2013] doi:10.1136/oemed-2013-101485.
- xliv Marcinkowski, T. and Urbanski, J. (2018) *The attitude of local residents towards fur farms in Poland*. ZOBSiE, April 2018. <https://www.furfreealliance.com/wp-content/uploads/2018/09/Local-impact-Poland.pdf> (accessed 22.06.21)

- 
- <sup>xlv</sup> Hettige, H., Martin, P., Singh, M. and Wheeler, D. (1995) *The Industrial Pollution Projection System*. Policy Research Working Paper. The World Bank.  
[https://documents1.worldbank.org/curated/en/690881468761745598/102502322\\_20041117170005/additional/multi-page.pdf](https://documents1.worldbank.org/curated/en/690881468761745598/102502322_20041117170005/additional/multi-page.pdf) (accessed 22.06.21)
- <sup>xlvi</sup> ACTAsia (2018) *Toxic Fur: A Global Issue*. Research in China. [https://www.furfreealliance.com/wp-content/uploads/2019/08/Toxic-Fur\\_A-global-issue.pdf](https://www.furfreealliance.com/wp-content/uploads/2019/08/Toxic-Fur_A-global-issue.pdf) (accessed 22.06.21)
- <sup>xlvii</sup> Bijleveld, M. (2013) *Natural mink fur and faux fur products, an environmental comparison*. CE Delft.  
[https://cedelft.eu/wp-content/uploads/sites/2/2021/04/CE\\_Delft\\_22203\\_Natural\\_mink\\_fur\\_and\\_faux\\_fur\\_products\\_FINAL\\_1375779267.pdf](https://cedelft.eu/wp-content/uploads/sites/2/2021/04/CE_Delft_22203_Natural_mink_fur_and_faux_fur_products_FINAL_1375779267.pdf) (accessed 22.06.21)
- <sup>xlviii</sup> Voices for Animals (2020) Longevity, repair and reuse of animal fur.  
<https://docs.google.com/document/d/1Ei1av4lyTt0guQvKYY6B71vnUAyznfvi/edit> (accessed 22.06.21)
- <sup>xlix</sup> Fur Free Alliance (2020) *Certified Cruel: Why WelFur fails to stop the suffering of animals on fur farms*.  
[https://www.furfreealliance.com/wp-content/uploads/2020/01/CertifiedCruel\\_FFA-Research-Report.pdf](https://www.furfreealliance.com/wp-content/uploads/2020/01/CertifiedCruel_FFA-Research-Report.pdf) (accessed 22.06.21)
- <sup>i</sup> IFF (2020) *Furmark Executive Summary*. Q1 2020. [https://www.sustainablefur.com/wp-content/uploads/2020/03/FURMARK-Executive-Summary-17.02\\_COMPRESSED.pdf](https://www.sustainablefur.com/wp-content/uploads/2020/03/FURMARK-Executive-Summary-17.02_COMPRESSED.pdf) (accessed 22.06.21)
- <sup>ii</sup> [Covid-19 on mink farms - Fur Free Alliance](#)
- <sup>iii</sup> [ECDC to assess risk associated with spread of SARS-CoV-2 in mink farms \(europa.eu\)](#)
- <sup>iiii</sup> 28 June 2021, [Cluster-5 minkvirus variant is now fully examined: Reduced sensitivity to antibodies confirmed \(ssi.dk\)](#)
- <sup>liv</sup> [Texts adopted - EU Biodiversity Strategy for 2030: Bringing nature back into our lives - Wednesday, 9 June 2021 \(europa.eu\)](#)