

Call for evidence on the fur market in Great Britain
Wildlife and Countryside Link response: June 2021

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 60 organisations to use their strong joint voice for the protection of nature and animals.

Introduction

- We welcome this call for evidence from the Department of the Environment, Food and Rural Affairs. The fur trade is a cause of significant animal suffering, and it is right to examine anew what the UK Government can do to reduce this, now we have left the European Union.
- We have provided responses to the questions where the expertise of our members can add relevant evidence. Our responses to consultation questions include:
 - Evidence setting out the animal suffering inherent to fur farming, which is on such a scale as to render mitigation through alleged 'high-welfare' farming schemes futile.
 - Confirmation of sustained public support for a comprehensive fur trade ban.
 - Evidence showing the environmental damage and public health risks that result from fur farming.
 - Confirmation that a ban would be permissible under World Trade Organisation rules.

Responses to consultation questions

Question 9: Is it wrong for animals to be killed for the sake of their fur?

Strongly agree.

Question 10: What are your views on whether any of following methods are acceptable ways to produce fur products?

- Farming animals primarily for their fur – Strongly disagree.
- Farming animals primarily for their fur but only if subject to an assurance scheme - Strongly disagree.
- Trapping or hunting animals for their fur - Strongly disagree.
- Trapping or hunting animals for their fur but only if as part of a conservation scheme - Strongly disagree.
- Producing fur as a by-product of legal farming - Disagree.
- Producing fur as a by-product of legal hunting or population control (where fur is not the primary value) – Strongly disagree.

Question 11: What is your attitude towards the import and/or sale and/or export of fur or fur products in GB?

The import of fur into Great Britain (GB) supports the maintenance of an industry that causes immense animal suffering – the fur farming industry that accounts for an estimated 85-95% of the fur produced globally.¹ The practice of fur farming is inherently cruel, to an extent whereby attempted mitigation measures are futile.

The wild animals used in fur farming, principally mink and fox, are solitary predators with an innate fear of human contact. In the wild they range over large territories, with mink having linear home ranges between 1.1 to 7.5 square kilometers² and foxes covering up to 13 square kilometers.³ Mink are semi-aquatic creatures, and typically maintain at least six separate dens within two metres of water.⁴

As these species have only been kept and bred in captivity for a relatively short time, and remain essentially wild animals, they retain very strong desires to perform their innate behaviors - to range, dig, forage for food and engage in breeding behaviour. In the case of mink, they have additional needs to access water for swimming, hunting prey and to regulate their body temperature. The circumstances in which wild animals farmed for their fur are kept, in cages in factory farm settings, provide no opportunity to satisfy these basic needs.

This imprisonment in circumstances utterly alien to their natural existence means that wild animals farmed for their fur are prevented from enjoying at least four of the five freedoms deemed to be essential for animals to have a life worth living⁵ - freedom from discomfort, freedom from pain, injury and disease, freedom to express normal behaviour and freedom from fear and distress.

The result of the confined, monotonous existence cages inflict is crippling mental distress, expressed in stereotypical behaviour where the animal repeats a behaviour, such as pacing. This behavior is regularly seen on fur farms around the world, along with fur-chewing, tail-biting and physical deformities.⁶

It is the very nature of fur farming, namely the imprisonment of complex wild animals in cages, that causes this suffering. As such 'high-welfare' fur farming is an oxymoron. So called 'welfare assurance' schemes such as 'Welfur' and 'Origin Assured' furs are attempts to cast a very thin veil of respectability over the cruelty inherent to all fur farming.⁷ A detailed 2018 study by Humane Society International UK studied two Finnish fur farms certified by a leading fur industry body as having 'the highest levels of animal welfare'. The study revealed horrific suffering, including gross obesity from the sedentary lifestyle wild animals were forced to lead and widespread wounds, resulting from bored and frustrated creatures fighting each other.⁸

¹ <https://hansard.parliament.uk/commons/2018-06-04/debates/8F9B6212-E631-4151-ABA7-AED8560CBEB/FurTrade>

² https://respectforanimals.org/wp-content/uploads/2017/04/WELFUR_REPORT_WEB.pdf

³ <https://www.wildlifeonline.me.uk/animals/article/red-fox-territory-home-range>

⁴ https://respectforanimals.org/wp-content/uploads/2017/04/WELFUR_REPORT_WEB.pdf

⁵ <https://kb.rspca.org.au/knowledge-base/what-are-the-five-freedoms-of-animal-welfare/>

⁶ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environment-food-and-rural-affairs-committee/fur-trade-in-the-uk/written/78781.pdf>

⁷ <https://www.furfreebritain.uk/resources/HSI-Political-Briefing-Two-A-rebuttal-to-fur-farming-certification-schemes.pdf>

⁸ <https://www.hsi.org/wp-content/uploads/2019/05/Five-Freedoms-and-Fur-Trade-briefing-2019.pdf>

Unlike large parts of the wider farming sector, which are moving away from cages altogether, fur farming remains completely reliant on intensive battery cage systems that cannot claim to be anything other than a system of ingrained cruelty. There is no sign of any fur farms moving away from cages, in any part of the world, due the tight margins the trade operates within, and difficulties associated with husbandry in more 'extensive' systems for carnivorous animals. Fur farming can only be sustained by perpetuated animal suffering.

This is a reality understood by the British public. A series of opinion polls show sustained support a ban on the import and sale of all animal fur in GB. A 2018 YouGov poll found 69% support (with a majority backing the ban across both Conservative and Labour voters)⁹, a 2021 poll found 72% public support for a ban.¹⁰

To a large extent, the law agrees with the public. Fur farming has been banned in England and Wales since 2000. In introducing the Bill that banned domestic fur farming, the Minister described fur farming as 'not consistent with a proper value and respect for animal life'.¹¹

In light of that recognition, the UK Government's continued support of international fur farming is morally inconsistent. If we recognise an activity as being too cruel to take place within our own borders, why do we support its continuation outside our borders? A farmed fox does not know what country it is suffering in, only that it is suffering.

By banning fur farming but supporting it internationally, we are effectively outsourcing our animal cruelty. We have said we do not want it in our own backyard, because it is cruel and people do not agree with it, but we are going to pay people in Finland, Poland, and China to do it. We are still paying for that same cruelty, and that is not acceptable.

Finally, it is important to highlight that the approximately 5-15% of fur that comes from the trapping of wild animals (as opposed to fur farming) is just as inhumane as fur farming. The trapping of wild animals involves the use of leg-hold traps, banned in the UK since 1958, which inflict considerable suffering on animals caught in them.¹² It is not just wildlife that suffers. Traps are indiscriminate, they also catch and kill non-targeted animals, including family cats and dogs as well as threatened and endangered species.¹³

Question 39: Please provide any other relevant evidence you would like to include to inform decisions on the GB fur trade.

There are number of myths about fur which are important to expose.

⁹ <https://www.furfreebritain.uk/resources/HSI-Political-Briefing-One-The-case-for-a-ban-on-the-UK-fur-trade.pdf>

¹⁰ https://yonderconsulting.com/wp-content/uploads/2021/05/OmFur_Trade-Page1.pdf

¹¹ [https://hansard.parliament.uk/lords/2000-07-19/debates/c509708e-b52d-4ca0-8a71-0e24f32b6f03/FurFarming\(Prohibition\)Bill](https://hansard.parliament.uk/lords/2000-07-19/debates/c509708e-b52d-4ca0-8a71-0e24f32b6f03/FurFarming(Prohibition)Bill)

¹² <https://www.caft.org.uk/trapping.html>

¹³ <https://www.bornfreeusa.org/campaigns/trapping/trapping-victims-fund/>

The first concerns the assertion that fur from fur farms is a natural, 'green' product. This is not the case – fur from fur farms are products of highly industrialized, environmentally damaging form of factory farming. Feed for caged animals consumes large amounts of resources, the waste and corpses of animals pollute the local environment and significant carbon emissions are caused by the transport of the resulting fur product.¹⁴ The cramped, unhealthy and unnatural conditions prevalent on fur farms mean they have the potential to become reservoirs for zoonotic disease. Covid-19 outbreaks occurred in more than 420 mink fur farms across the USA, Canada and Europe in 2020 and 2021, facilitating the spread of the disease not only from mink to mink but also mink to humans – a Danish study found that that fur farmers had a greater risk of contracting COVID-19 than doctors and nurses.¹⁵

The high environmental and public health costs of fur farming are even harder to justify when the existence of an alternative is considered. Whilst faux fur does have an environmental impact, it tends to be lower than actual fur. A 2013 study from the Delft research institute compared environmental impacts of a real fur coat versus a fake fur coat over the lifetime of each product. It looked at 18 areas of environmental impact, including water pollution, carbon emissions and land use, and concluded that the environmental 'impact of a natural mink fur coat in all cases is at least 3 times higher than the impact of a faux fur coat'.¹⁶

A second myth concerns the alleged incompatibility of a ban with World Trade organisation rules. This overlooks article XX(a) of the General Agreement on Tariffs and Trade (GATT), which provides an exception to the GATT's trading rules for measures that are necessary to protect public morals, as long as such restrictions are not made arbitrarily or unjustifiably resulting in discrimination amounting to disguised restrictions on the international trade. In a landmark 2013 Panel Report¹⁷ that dealt with the permissibility of the EU ban on the placing on the market of seal products, the WTO recognised that public moral concerns regarding animal welfare are a legitimate reason to justify trade-restrictive measures. A GB fur import ban could not be viewed as a protectionist measure, since GB has no domestic farmed fur production to protect. The British public's significant moral opposition to the fur trade, amply demonstrated using opinion polls over several decades, makes a strong public morals case.

There is growing range of precedents for a comprehensive fur trade ban (see full list in appendix 1). California, with a population of 39 million, recently banned the trading of all new fur products within its borders¹⁸, following the precedent set by the City of West Hollywood in 2013¹⁹

As of this month (June 2021) Israel has become the first country to ban the trade of fur.²⁰

¹⁴ <https://respectforanimals.org/fur-is-not-green/>

¹⁵ <https://www.hsi.org/wp-content/uploads/2020/12/HSI-white-paper-on-fur-production-and-zoonotic-disease.pdf>

¹⁶ https://cedelft.eu/wp-content/uploads/sites/2/2021/04/CE_Delft_22203_Natural_mink_fur_and_faux_fur_products_FINAL_137577_9267.pdf

¹⁷ https://www.wto.org/english/tratop_e/dispu_e/400_401r_e.pdf

¹⁸ <https://www.theguardian.com/world/2019/oct/13/fur-ban-california-outlaws-making-and-selling-new-products>

¹⁹ <https://www.weho.org/city-government/city-departments/public-works/code-compliance/code-enforcement/fur-ban>

²⁰ <https://www.peta.org.uk/blog/israel-bans-fur/>

GB has the opportunity to be an early adopter of this approach, setting a global lead in rejecting the fur trade. In 2000, the UK Government's ban on domestic fur farming set a precedent that 15 countries have now followed – we can now set a new lead in banning the trade itself. It is high time to end the ethical inconsistency where we do not allow the misery of fur farming within our borders but sustain its operation overseas.

This response is supported by the following Link members:

Naturewatch Foundation
FOUR PAWS UK
Badger Trust
Born Free
Humane Society International UK

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Appendix 1 - International precedents for action on fur

Countries that have announced fur bans:

- Austria: Banned fur farming in 2005.
- Netherlands: All fox and chinchilla farms ceased operation by 1st April 2008. Passed ban on mink fur farming in 2012 to phase-out production by 2024. Due to COVID-19 outbreaks in Dutch mink fur farms, the government declared an early shutdown of the industry in 2020.
- Croatia: Banned fur farming in 2018 with a ten year phase-out period.
- Slovenia: Banned fur farming in 2013 with a three year phase-out period.
- Republic of Macedonia: Banned fur farming in 2014.
- Serbia: Banned fur farming in 2019.
- Bosnia and Herzegovina: Banned fur farming in 2009 with a nine year phase-out period. Deadline was retrospectively extended to 2028. Due to economic decline of fur industry, the last Bosnian fur farm shut down in 2020.
- Estonia: Banned fur farming in 2021 with a five year phase-out period.
- Slovakia: Banned fur farming in 2019 with a six year phase-out period.

- Czech Republic: Banned fur farming in 2017 with a two year phase-out period.
- Belgium: Banned fur farming in 2018 with a five year phase-out period.
- Luxembourg: Banned fur farming in 2018.
- Norway: Banned fur farming in 2018 with a seven year phase-out period.
- Ireland: Committed to a ban in 2020, with legislation currently being drafted.
- Japan: In 2006, Japan passed the Invasive Alien Species Act, which restricted the breeding of the non-native species American mink, raccoon, and coypu. The act essentially outlawed fur farming, with all fur farms now closed.

Countries considering fur farming ban legislation:

- Bulgaria, Lithuania, Montenegro, Poland and Ukraine.

Countries that have announced partial fur bans or stricter welfare regulations:

- Germany: Introduced stricter keeping standards for fur farming in 2017. A few farms operated unchanged until 2019, when all mink fur farms closed down due to lack of profitability in fur production.
- Sweden: Sweden's Animal Protection Ordinance of 1995 banned caging foxes and introduced stricter keeping standards, making fur production no longer economically viable so all fur farms shut down.
- Spain: Introduced stricter regulations to prevent ecological damage by escaping mink from fur farms, banning the building of new mink fur farms.
- France: Banned mink fur farming in 2020 with a five year phase-out period. France still allows Orylag rabbit fur farming.
- Hungary: Banned mink, fox, polecat and coypu breeding for fur in November 2020 following COVID-19 outbreaks in European mink fur farms. Ban introduced as partial legislation as a precautionary measure to prevent further fur farm operations moving to Hungary.
- Denmark: Banned fox fur farming in 2009 with a 14-year phase-out period for all fox fur farms. Banned mink fur farms for the whole of 2021 due to COVID-19 outbreaks.
- New Zealand: Banned the import of mink, effectively banning mink farming in 2013. Leg-hold traps are legal and used to trap possum.

- USA: Some states prohibit keeping foxes in captivity. California has housing requirements for mink and foxes that make the costs of fur farming prohibitive. The state of New York passed a law against the electrocution of fur animals.

Trade Bans

- Israel: In June 2021, Israel became the world's first country to ban fur sales with exemptions for 'scientific research, education or instruction, and for religious purposes or tradition'.
- California: In 2011, West Hollywood banned the sale of fur with a two year phase-out period. In 2018, San Francisco and Los Angeles decided to ban fur, with the latter coming into effect in 2021. In 2019, California became the first US state to ban fur sales with a four year phase-out period.
- India: In January 2019, India introduced an import ban on mink, fox and chinchilla fur.