

## Position Paper on Traceability

Fur Europe welcomes the Regulation on Consumer Product Safety and the Regulation on Market Surveillance since it supports transparency and protection of the consumers. However, the suggestion of informing the consumer on the “indication of origin” can have the opposite effect than transparency. Therefore Fur Europe suggested that the European Parliament and the Member States remove this article from the final Regulation on Consumer Product Safety (2013/0048). This suggestion however was not accepted. The proposal is now stuck in the discussions in the Council of Member States, because of reluctance to support “Country of Origin”.

According to article 7 of the regulation there will be an introduction of a label, giving the “indication of origin”. The country of the label will be the country of “point of last economic transformation”. This would mean that European fur manufactured in China would carry a label saying “Country of origin: China”.

Fur produced in Europe is known for its high quality and its high focus on animal welfare but with such a label the consumer will not be able to know where and under which conditions the fur is produced. The fur sector is a worldwide business and different parts of the fur product is produced and manufactured in different countries. With article 7 of the regulation, the consumer will not be informed about the different steps but only the last economical substantial step. This in many cases will be either China or Hong Kong, as many of the dressing and dyeing processes are carried out in these countries.

The study conducted by Matrix Insight Ltd on request of the European Commission also concludes that the majority of the European consumers are not really interested in an origin label, and if they are, the price of the end products will still be valued higher than origin. Transparency requires that consumers are told what kind of material they are buying, rather than be given an indication of the origin.

Fur Europe recognizes the interest of the consumer to know how the fur on their garments is produced, e.g. animal welfare standards. Should a compulsory label be introduced we would like to push for a discussion on how such a label could be made and which elements it should include. If there is a suggestion of mentioning “country of origin” we would argue for having both producing country and manufacturing country mentioned.

To contribute to transparency and traceability, Fur Europe developed and implemented an animal welfare certification program called WelFur giving the opportunity to publish national results in order to give the consumer traceability and transparency in the production chains and guarantee that science-based animal welfare standards at the individual farm level are respected for fur produced in Europe.