

## Fur Europe Position on Regulation on Official Controls

Fur Europe welcomes the new Regulation on Official Controls, in particular the parts referring to animal welfare is of key interest to the fur sector. We support the possibility for sectors without legislative indicators.

In 2009, Fur Europe initiated a scientific project that was independently conducted by researchers from 7 different European Universities. WelFur has progressed since and the protocols for both foxes and mink are being finalized and the implementation will begin on the European fur farms. The main objective of the WelFur programme has been to set a general certification protocol at European farm levels, which will support a high level of animal welfare on the fur farms. To promote the use of scientifically based animal welfare indicators is a key priority for Fur Europe.

Fur Europe therefore urge the European Parliament to vote in favor of the use of the indicators mentioned in Article 18 of the Regulation.

In connection with our position on science-based animal welfare, we are highly concerned about Article 95 and 96 concerning Animal Welfare Reference Centers. In the proposal it is not clear that it will be science-based decisions that will set European standards. The Animal Welfare Reference Center is different from the other Reference Centers mentioned in the same Regulation. The ethical discussion is included, and it is said that the Reference Center can carry out scientific and technical studies. We respect ethical considerations with regard to the human use of animals. However, we strongly believe in ensuring the welfare of the animals based on scientifically validated measures.

**Furthermore we do not believe that the Reference Centers should conduct animal welfare studies. Fur Europe supports the work done by EFSA, and we fear that it will become unclear if both institutions conduct studies. However we support that the Reference Center could have a valuable coordinating role.**

Attached you will find some concrete amendments.

**Amendments:**

Article 95, 2 (B): “Have suitable qualified staff with adequate training in the areas referred to in point (A) and in ethical issues related to animal and support staff as appropriate;”

Article 96 (d): “Carrying out scientific and technical studies on the welfare of animals used for commercial or scientific purposes” should be changed to **“Coordinate scientific and technical studies on welfare of animals used for commercial or scientific purposes”**.

(Coordinating has been used for the other reference centers).