
Position Paper on Regulation on Consumer Product Safety and Labelling of Fur Garments

Fur Europe welcomes the regulation on product safety and the regulation on market surveillance, as it strongly 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 suggests the European Parliament and the IMCO committee to remove this article from the final Regulation on Consumer Product Safety (2013/0048)

Country of Origin label and implications on the fur sector

- 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”. The consumer would not be able to know where and under which conditions the fur is produced. Fur produced in Europe is known for its high quality and its high focus on animal welfare.
- 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 of 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. This possibility is clearly stated in the VVA Europe LTD study published in May 2015 upon request of the European Commission: “a single origin label may not effectively communicate the origin of the product as understood by consumers. Therefore, in some cases origin labels risk not being in line with consumers’ expectations. This is more likely to be the case for complex products manufactured in multiple countries.”
- Transparency requires that consumers are told what kind of material they are buying, rather than be given an indication of the origin.
- Several studies concludes that the benefits of a “compulsory indication of origin” labelling would be overshadowed by its costs. The study conducted by Matrix Insight Ltd on request of the European Commission concludes that the majority of the 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. Additionally, a Databuild study (March 2015) commissioned by the Department for Business Innovation and Skills of the UK government concludes that “Compulsory Country of Origin marking would seem to be a requirement that will increase costs and complexity for business without benefit for public authorities or consumers.” Lastly, similar conclusions were drawn in the VVA Europe LTD study, whereas it concludes that “the majority of national authorities expect to face additional costs with regard to Article 7”, while the same article “is unlikely to substantially contribute to improving product safety”.
- Fur Europe believe that the consumer has a right to know where the fur on their garments is from, yet with the suggested label it will not be easy for the consumer to trace the fur back to where it is produced. Consequently, article 7 on “indication of origin” could significantly harm transparency. Should a compulsory label be decided we think that the consumer should have the full information, both where the fur is produced and where it is manufactured.

Initiatives taken by the fur sector

- In 2009 the Fur Europe initiated an animal welfare certification program, inspired by the Welfare Quality® project started by the European Commission. The programme has been elaborated by researchers at 8 European universities that developed an animal welfare certification program at farm level. The protocols will be published in 2013 and the implementation at farm level has already commenced. The objective of WelFur is to give the consumer full transparency in the production chains and guarantee that science-based animal welfare standards, at the individual farm level is respected for fur produced in Europe.

Current legislation concerning fur garments

- Textile Regulation (1007/2011) where it is compulsory to label textiles that contain at least 80 % textiles and less than 20 % animal product. The label should say: "Contains non-textile parts of animal origin", in the language of the country where it is sold.
- The REACH Regulation (1907/2006) helps to ensure the consumer that if chemicals are used in the manufacturing, it is not a danger to health and environment.
- On production level our sector is covered by the regulation 98/58 and the 1999 Council of Europe Recommendation concerning animal welfare. We are also going to be covered by the new Animal Welfare Framework Law which is expected to be published by the Commission in 2014-2015.