EXECUTIVE SUMMARY

- The report The Case Against Fur Factory Farming claims to be a scientific review, but fails on a number of factual errors and misinterpretations. The report is political rather than scientific.
- The report has origin in people and organisations associated with the animal liberation ideology, and consequently also a political motivation to ban fur farming.
- WelFur is based on the principles of the European Commission’s Welfare Quality programme, and developed by independent scientists from universities across Europe. In addition WelFur is peer-reviewed by scientists who have done actual research on fur farmed animals.

FUR EUROPE FINDS THE NEW SCIENTIFIC REPORT ON WELFUR NOT VERY SCIENTIFIC


The report does not bring anything new into the debate over fur; the premise of the argumentation remains that fur farmed animals are not domesticated, and furthermore deprived of the opportunity to exercise natural behaviour in the existing housing systems and consequently suffer. However this conclusion is not supported by the available scientific research from independent universities across Europe.

Upon request Fur Europe gave the report’s author, Professor Stephen Harris, the WelFur protocols already in 2014. In spite of having more than one year to examine the WelFur protocols Mr. Harris fails to fulfil the report’s objective of doing a scientific review of WelFur. This is indeed acknowledged in the report’s page 46: “It is beyond the scope of this report to give a detailed critique of the WelFur protocols”.

The report contains a number of factual errors and misassumptions, the most important of which we have listed in the end of this document. While claiming to be a scientific report, and yet acknowledging that it is beyond the scope of the report to give detailed critique of WelFur, Fur Europe suggests that “The Case Against Fur Factory Farming” is a political report rather than a scientific one. This idea is further supported by the history of the people involved in the report:

- Not doing research in the field of fur farmed species report author Stephen Harris has been publicly quoted of saying “Fur farms have more in common with concentration camps than normal farms”.

1 Quoted in the Express (UK), 31 July 1998 and 11 August 1998
Co-author Heather Picket has worked for a number of organisations advocating the ideology of animal liberation\(^2\) – the idea that human beings have no right to use animals for any purpose including steaks, yoghurt, sport fishing food, leather shoes, medical research, Zoos etc. etc.

Former director of Humane Society International in the UK, Mark Glover, who presented the report to the Intergroup on Animal Welfare on behalf of animal liberation organisation Respect for Animals has been sentenced by a British court to pay damages to the amount of 40,000 British Pounds for false allegations against a fur farmer.\(^3\)

Needless to say, the report’s association with the ideological idea that animals should not be utilised for human beneficial purposes fosters a political motivation to ban fur farming. In this light Fur Europe wanted to give a presentation during the intergroup meeting in order to ensure a democratic and balanced debate. Eurogroup4Animals, the secretariat of the intergroup, denied the request but allowed Fur Europe to come and join the open meeting and answer questions upon request. The presentation we would have wanted to give to the intergroup can be found on Fur Europe’s website.

It is not Fur Europe’s mission to claim that European fur farming is entirely without animal welfare issues. Of course this is not the case, though the welfare problems in the fur sector are documented lower than other conventional animal farming practices. We are however dedicated to constantly working to improve things.

The fur sector welcomes the discussion on the Animal Welfare on the fur farms. All parties with interest in improving animal welfare standards in Europe ought to enter into dialogue with Fur Europe. Our WelFur programme sets a new standards for animal welfare in Europe for others to follow, and it does so based on validated scientific knowledge.

Neither personal views nor animal liberation ideology form a sound basis for a discussion on animal welfare in the European fur sector.

**WELFUR – SCIENTIFIC ANIMAL WELFARE ASSESSMENT**

WelFur is a science-based on-farm animal welfare assessment program voluntarily initiated by the European fur sector in 2009. The pan-European implementation of WelFur begins in 2016.

WelFur is developed by independent scientists from seven European universities. The scientific research behind WelFur is internationally published and peer-reviewed, and the final review of WelFur is very clear in acknowledging the scientific validity of the WelFur protocols:

> We commented on scientific reviews that were conducted into potential welfare issues and potential welfare indicators. These were all detailed, scholarly, involved hundreds of person-hours of work, and were of publishable quality. Their analyses of the key issues, and of the validity, reliability and practicality of the various potential welfare indicators available, were very thoughtful and robust. The relative merits of animals-based indicators versus resource-based measures were well appreciated (animal-based measures being favoured wherever possible, a

---

\(^2\) Including Respect for Animals, Onekind, Four Paws, Compassion in World Farming, Sea Shepherd International

\(^3\) Leeds High Court, 5 November 1992
decision we support). Overall, these reviews provided a firm scientific foundation for all subsequent decisions⁴.

Welfur takes starting point in the existing housing systems, and based on the principles of the European Commission’s Welfare Quality project it takes on the multifactorial approach to animal welfare which the scientific community agrees on. This includes natural behaviour. The scientific foundation of Welfur proves that it is possible to house fur farmed species in the existing systems and provide the animals with a good life. The Welfur protocols are dynamic in the sense that if new science prove better methods, they will be included in the certification system.

Fur Europe is happy to answer any scientifically relevant questions about the Welfur protocols. More information on Welfur and the actual Welfur protocols can be found on Fur Europe’s website.

COMMENTS TO THE REPORT “THE CASE AGAINST FUR FACTORY FARMING”

This section contain Fur Europe’s comments on selected sections of the report “The Case Against Fur Factory Farming”. For further information about the scientific basis of animal welfare standards in the European fur sector we refer to Fur Europe’s website and the independent universities across Europe doing research on animal welfare for fur species. These are listed in the Welfur protocols.

ON THE DOMESTICATION OF FUR FARMED SPECIES, P. 5.

“Although, experimentally, mink and silver foxes can be domesticated, this has not, and cannot, occur on fur farms because changes in the coat that are characteristic of domesticated animals are incompatible with the fur industry’s demands [...] Fear of humans in the undomesticated animals used by the fur industry makes them fundamentally unsuitable for farming.”

Fur Europe’s comment: Firstly, it is beyond any serious discussion that the domestication of fur farmed species is well established in the scientific literature⁵, though the signs of the domestication may be less visible (the so-called second wave of domestication) as with the animals with longer history of domestication (e.g. cows and dogs). It correct that mink and foxes can be breed to become more confident/curious and less fearful – the scientific community has provided tools for this during years of research. However, the statement implying negative effects on coat/fur quality is not correct.

The researchers have been involved in the selection for more domesticated mink and foxes (breeding for confident/explorative/curious and against fearful animals) with thousands of animals over decades – with no concurrent changes in their coat spotting for example. Furthermore, a recent large study documented a positive correlation between breeding for confident/domestic mink and pelt quality⁶ Thus, breeding for confident mink improves pelt quality - in contrast to the report’s claim. In addition, national legislation often requires breeding for confident animals just as selection is a part of the Welfur programme.

---

⁴ Report by the External Review Committee (September 2013), by Prof. Harry Blokhuis, Swedish University of Agricultural Science, Uppsal, Sweden; Prof. Georgia Mason, University of Guelph, Canada; Prof. Emeritus David Morton, University of Birmingham, UK.


⁶ Thirstrup et al. (2014), ‘Identifying QTL and and genetic correlations between fur quality traits in mink (Neovision vison)
ON ANIMAL WELFARE ASSESSMENT, P. 16 AND 17

“This approach gives greater emphasis to the importance of positive experiences to farm animal welfare and reflects an ongoing shift in animal welfare science towards attempts to incorporate positive aspects of welfare into welfare assessment.”

Fur Europe’s comment: There are a number of positive experiences to the welfare of farmed mink and fox welfare that are not included in welfare assessment systems like Welfare Quality and thus Welfur. These are e.g. natural mating that is used in all mink and therefore not included as a measure of positive experience. Others are nest building and unrestricted delivery, nursing and lactation for the full period of normal milk production both for mink and foxes. Fur animals are not transported either. These circumstances are all associated with the biological functioning of fur farmed species, and are all very positive regarding the overall animal welfare and the providing of a good animal life.

ON BIOLOGY AND NATURAL BEHAVIOUR OF MINK AND FOXES, P. 19

“Studying the preferences and motivation of animals under experimental conditions can reveal which behaviours are most important to the animal and which they need to be able to perform in captivity.”

Fur Europe’s comment: This is exactly as it has been done in research on mink and foxes for the development of cage environment.

“There may be some territory overlap between mink of the opposite sex but territories of animals of the same sex rarely overlap. Mean linear home range size ranges from 1.1 to 7.5km, depending on sex (generally larger for males than females) and habitat.

Fur Europe’s comment: There are normally overlaps as male territory overlaps up to 5 females7 as the researchers recall the literature (Dunstone, N. 1993. The Mink. T& A D Poyser Ltd, London, U.K.). The large variation in range of territory indicates that territory size is defined by, or a consequence of availability of food. What would the territory be if food was abundant at all times?

“Adult mink are generally solitary. Males and females associate briefly for mating in early spring and on average four kits (range two to eight) are born in late spring. They are nutritionally independent by eight to ten weeks of age and typically begin to disperse when around 12-16 weeks old, although young females may stay with their mother until they are 10 or 11 months old and kits of either sex may travel in pairs until late autumn. Juveniles may travel a few kilometres up to 50 km in search of their own territory.”

Fur Europe’s comment: This is very much the same as normal farm management procedures on mink farms.

ON THE WELFUR ASSESSMENT SYSTEM, P. 46-48

“The ‘stick test’ is a relatively insensitive test of fear reactions (see Section 4.2) that is only suitable for use on fearful populations of mink, so the very fact that the test can be applied suggests that the animals are in general highly fearful, even if there are differences between individuals.”

Fur Europe’s comment: This is quite contrary to the vast scientific documentation of what the ‘stick test’ of temperament shows.

7 Dunstone (1993), ‘The Mink’
“Later weaning or housing in family groups through to pelting is likely to have considerable benefits for both mothers and kits, provided they are housed in systems with sufficient space and enrichment, but the WelFur protocol discourages the development of such systems.”

Fur Europe’s comment: No support for this hypothesis can be found in the literature while the opposite have been found and published several times.

“The WelFur protocols specifically instruct assessors to avoid observing stereotypic behaviour when the animals can hear the sound of the feeding machine. Stereotypies are most likely to be performed at this time. Avoiding this time may help to standardise the protocols but it will underestimate the true extent of stereotypies. Animals may also stop stereotyping in response to the presence of an observer, which will further contribute to an underestimation of the true level.”

Fur Europe’s comment: The stereotypy observations have been designed to give the best possible assessment passing the criteria of validity, reliability and feasibility. If these are violated, the measure of stereotypy should be dropped from the protocol. If stereotypy should be observed during feeding, it would not be possible to observe the entire sample and therefore this measure would not be feasible. As stated in the protocol, mink and foxes are not observed while affected by the presence of an observer.

“There is no attempt here to encourage progress beyond already existing minimum standards and the assessment protocol appears to condone practices that breach minimum standards by a substantial margin.”

Fur Europe’s comment: WelFur is based on science, rather than legal standards. Numerous studies have demonstrated that environmental complexity is important to the welfare of mink while the size of the cage is important in order to allow for the environmental complexity/enrichment. For instance a research project found that access to standard cages or double cages had no effect on occurrence of stereotypic behaviour, fur chewing or physiology linked to welfare, but mink with access to double cages used the nest box less, had a lower consumption of straw and pull-ropes than the mink with access to only one cage. There is no indication or documentation of restriction in the mink’s ability to move around in the cage because of the wire mesh floor. Both the cage size and the height of the cage for foxes is required to be bigger than the minimum standards (EU-recommendations) in order to get the highest possible score in the WelFur assessment. Also fulfilling the legally required minimum standards does not bring the highest score in the WelFur assessment. This encourages the fur breeders to progress beyond the existing minimum standards.

“It might seem inconceivable to most people that an animal whose welfare has been compromised to such an extent that it has chewed off its own limb, even if the wound has since healed, should be given anything other than the worst available score in recognition of this clear indication of extreme suffering.”

Fur Europe’s comment: In most, if not all cases a missing part of a tail or a limp that has healed is a result of the dam helping the kit during birth and therefore has nothing to do with extreme suffering. It is rather a question if it involved suffering during the birth situation, but it is included in the protocol to give the benefit of the doubt.

“In combining the scores for different aspects in the WelFur protocols, minimum scores for all sections are imposed for each category. For example, to attain ‘best current practice’, a farm must score more than 80 out of 100 on two Principles and at least 55 out of 100 on all Principles (with a tolerance of 5%, so in effect 50% is sufficient). However, there are several Criteria within each Principle, so it is still possible for a poor score on one Criterion to be masked by good scores on others within that Principle. In this way, very serious welfare failings may not unduly

Hansen et al (2007), ‘Do double cages and access to occupational materials improve the welfare of farmed mink’
affect the overall score, especially if those failings are scored too leniently to start with as in the example, given in the previous paragraph, of very serious injuries that have healed.”

Fur Europe’s comment: Masking and compensation is a matter to be handled in all welfare assessment systems. WelFur has dealt with this exactly as in Welfare Quality, where compensation in general has been avoided as possible.

“Time constraints mean that generally only a small proportion of the animals on a farm can be included in the assessments, which may not necessarily be representative of the welfare of other animals on the farm.”

Fur Europe’s comment: This is why a representative sample is defined on which all measures are then taken.

“While the existing scientific research may have been reviewed, the protocols themselves are necessarily constrained by the need to be able to carry out the assessments in a short period of time. The WelFur assessments are intended to be performed within approximately 5-7 hours. Therefore, only welfare measures which can be performed quickly on-farm can be included. Wechsler states: “A specific problem of on-farm animal welfare assessment is that there is often not enough time to collect sufficient data to make a judgement about the occurrence of normal behaviour”.

Fur Europe’s comment: Welfare Quality and WelFur do not claim to be something else than on-farm welfare assessment systems. They are not perfect but they give a good assessment of the welfare of the animals on the farm.