

EXECUTIVE SUMMARY: A science-based view on welfare standards in the European fur production

This document is an answer to the brief 'Facts about Fur Production' forwarded to a number of Members of the European Parliament by Eurogroup for Animals in January 2014.

The Eurogroup brief is based on emotional arguments, and to the extent scientific literature is used as references, these are either questionable or misinterpreted. Eurogroup fails to recognize the large amount of independent scientific literature concerning animal welfare for fur farmed species. The voluntarily initiated animal welfare assessment programme WelFur that seeks to further improve and assess animal welfare beyond otherwise comprehensive existing legislation, is likewise ignored.

Fur farmed mink and fox are domesticated animals, and the scientific literature on the domestication of fur farmed species is very clear on this. Furthermore, it is important to understand that is not the 'naturalness' of the behavior that should be our criterion for whether animals suffers but what the animal's own behaviour has shown us it finds reinforcing or not. Contrary to often stated claims, existing scientific literature fails to recognize access to large territories, digging and swimming water as essential needs for fur farmed animals, since, in nature, such behaviors are linked to the search for food – a need already fulfilled on fur farms.

Lacking scientific references, Eurogroup for Animals points attention to wounded animals highlighted in a number of illegally obtained undercover videos filmed by animal advocates on European fur farms. This presentation fails to offer any perspective of the extent of wounded animals in the fur production. Such perspectives are however, given by veterinarians and other experts from national animal welfare control authorities. Surveys suggest the number of wounded animals to be 0,1% - way below other animal industries, and certainly not corresponding to the picture painted by Eurogroup for Animals.

As much as we respect Eurogroup for Animals' right to be in opposition to fur, we have very little faith in their willingness and capability to interpret and acknowledge objective and independent scientific research on animal welfare for fur farmed species.

A science-based view on welfare standards in the European fur production

Following the announcement of the European fur industry's exhibition in the European Parliament 21.-23. January 2014, Eurogroup for Animals distributed a paper to Members of the European Parliament under the headline 'Facts about Fur Production'.

With this document we would like to point to your attention the lack of relevant scientific references, the misinterpretation of the few scientific references used, and the use of questionable references by Eurogroup for Animals in a 'fact' sheet largely based on emotional messages. As much as the European Fur Information Center acknowledges that an opposition to fur and fur farming exists, the debate about fur and fur farming - to the extent the debate concerns animal welfare - should be based on existing knowledge and research about welfare on European fur farms.

We find it disappointing that Eurogroup for Animals – the secretariat of the European Parliament's Intergroup on Animal Welfare and Conservation of Animals - chooses to ignore current, independent animal welfare research. Furthermore, we regretfully find that this ignorance towards scientifically valid animal welfare research only serves to polarize the debate about welfare standards in the European fur sector.

1. WELFUR: THE NEW SCIENTIFIC REFERENCE ON ANIMAL WELFARE FOR FUR FARMED SPECIES

Fur farming is one of the most regulated agricultural activities in Europe with both European and national legislation in force. In addition, the European fur sector has voluntarily initiated the Welfur project that seeks to further improve and assess animal welfare beyond existing legislation based on scientific, objective measures.

The activity of fur farming is regulated by Council Directive 98/58/EC and the recommendation concerning fur animals adopted by the Council of Europe on 22 June 1999, which constitutes part of EC law. Recent on-farm audits performed by the Food and Veterinary Office in certain Member States show that they comply with the existing rules. Furthermore, the fur industry has put in place voluntary programmes, such as Welfur and the Origin Assured label which aim at ensuring that adequate animal welfare standards are respected at farm level¹.

Within the scientific community there is general understanding about what represents good animal welfare, and this consensus is reflected in the four welfare principles established in the European Commission's Welfare Quality project: good housing, good feeding, good health and appropriate behavior. Based on the principles of the Welfare Quality, the Welfur project was initiated by the European Fur Breeders' Association in 2009, and the protocols for farmed mink and fox were

¹ Mr. Antonio Tajani on behalf of the European Commission (2013), answering to question no. E-010863/2013, <http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2013-010863&language=EN>

finalized in 2013. The implementation of WelFur at a pan-European level begins by the end of 2014. Already amongst the world's most comprehensive animal welfare assessment systems, the pan-European implementation of WelFur will make European fur farmers world leading in science-based animal welfare assessment, and at the same time WelFur provides a professional hands-on tool for fur farmers to improve animal welfare, as well as ensuring farm level transparency to European citizens. In addition, WelFur is a dynamic programme which will be revised regularly with the scope of adopting the latest scientific knowledge.

WelFur is developed by independent scientists from seven European universities². During the development of WelFur the scientists did an in-depth review of all existing animal welfare research on fur animals before they identified the welfare indicators and measurements which eventually became the WelFur protocols. The in-depth review includes the few scientific references put forward by Eurogroup for Animals. As such WelFur works as the new scientific reference for animal welfare for fur farmed mink and fox in Europe.

Throughout the development of WelFur, external reviewers involved in the original Welfare Quality project have conserved the quality of the scientific work and the alignment with the original Welfare Quality project. 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 decision we support). Overall, these reviews provided a firm scientific foundation for all subsequent decisions³.

Good animal welfare standards must consider biological characteristics of the fur animal species, the behavioural needs of the animals as well as directions regarding the design of cages and management procedures. The scientific validity of WelFur is the evidence that it is entirely possible to house fur animals with respect to these considerations and ensure good animal welfare.

1.2 DOMESTICATION

It is often claimed that mink and fox are essential wild animals given that the domestication process has been relatively short (80-100 generations). Domestication is however, not dependent of

² National Institute of Agronomic Research (INRA), Clermont-Ferrand, France; University of Eastern Finland, Dept. of Biology; MTT Agrifood Research, Animal Production Research, Finland; Aarhus University, Dept. of Animal Science, Denmark; Norwegian University of Life Sciences, Dept. of Animal and Aquacultural Sciences; Swedish University of Agricultural Sciences, Dept. of Animal Environment and Health; University of Utrecht, Faculty of Veterinary Medicine, Dept. of Animals in Science and Society.

³ Report by the External Review Committee (September 2013), by Prof. Harry Blokhuis, Swedish University of Agricultural Science, Uppsala, Sweden; Prof. Georgia Mason, University of Guelph, Canada; Prof. Emeritus David Morton, University of Birmingham, UK.

thousands of years in captivity. The world's most groundbreaking domestication research project was carried out by Russian researcher Dmitry Belyaev who in the course of 25 generations selected silver foxes for tameness to the extent that they became dependent on human contact. Belyaev had compressed thousands of years of domestication into a few years⁴. Other research projects reach the same conclusion, and it is well documented that different temperaments can be bred for within decades⁵.

The farmed mink have undergone strikingly similar changes in the morphological and physiological characteristics of domesticated animals, just as behavioral characteristics of domestication, *e.g.* reduced fearfulness towards humans is well documented⁶. Thus, the domestication can hardly be questioned:

Minks form a reproductive community with their wild form, and in that sense, no new species is formed in the domestication process (as opposed to different breeds, which are formed), but that is the case with all domesticated animals, including those that were domesticated 5,000-10,000 years ago. There is therefore not the slightest doubt any more as how to answer the question, namely with an unequivocal yes, minks are domesticated, on a morphological, physiological, genetic and ethological basis and research⁷.

1.3 NATURAL BEHAVIOUR

Consumers and non-scientists tend to value 'naturalness' and are more influenced by the aesthetic appearance of a system than by whether the scientist's detailed measurement have indicated the welfare better or worse. In line with the claim that fur animals are wild it is often stated that fur animals lacks the availability to exercise natural behavior which compromises essential needs of the farmed fur animals. Often most these claims are linked to the size of the animals' territory in nature, access to swimming water and digging in the ground (mink and fox respectively).

In this respect it is important to notice that both territory size, access to swimming water and digging in the ground in nature is closely linked to the search for food or the building of a nest, all needs which are fulfilled in the housing environments of mink and fox. Thus, these are not essential needs for fur farmed animals, but can help improve welfare in that digging and swimming are occupational activities. However, no existing research suggests that occupational activities cannot be replaced with other kinds of enrichment, *e.g.* platform enrichment, straw enrichment, biting ropes, hard plastic tubes etc. In fact:

Research indicates that the effect of access to swimming water is less than the welfare improvements which can be achieved by cage enrichment with platforms, tubes and biting

⁴ D. K. Belyaev (1979), 'Destabilizing selection as a factor in domestication'.

⁵ L. N. Trut (1999), 'Early canid domestication: the farm-fox experiment', *American Science* 87: 160-169; Rekilä *et al* (1999), 'Selection against fear in farmed foxes', *Proceedings of the 33rd International Congress of the International Society for Applied Ethology* pp 93.

⁶ *E.g.* Hansen *et al* (2001), 'The application of temperament test to on-farm selection of mink', *Acta Agriculturae Scandinavica, Anim. Sci. Suppl.* 30: 43-98;

⁷ E. Decuyper (2011), 'Is the mink domesticated?'

objects. In addition, not all mink enter swimming water which would be expected if mink had an essential behavioral need for swimming water⁸.

Still, both mink and fox exercise considerable amounts of species-specific behavior. The farmed mink spend 70-80% of its time in the nest box which corresponds to the behavior amongst its wild counterparts⁹. Mink also raises their own kits. Likewise, the welfare for farmed foxes is closely linked to their ability to exercise social behaviour as in nature, just as the cage design is paramount for the welfare on fox farms¹⁰.

At the moment independent scientific research on fur farmed species clearly indicate that further welfare improvements first and foremost can be gained through cage enrichment on which research is being undertaken at the moment. As the WelFur protocols are being revised every 5 years based on revision of the current protocols, recommendations from external reviewers and new scientific research, such new research will be adopted and implemented at farm level in Europe.

Finally, we would like to point attention to the fact that in any animal welfare discussion, that of fur animals included, it is of utmost importance not to confuse perceived reality with scientific knowledge:

It is not the 'naturalness' of the behavior that should be our criterion for whether animals suffers but what the animal's own behaviour has shown us it finds reinforcing or not¹¹.

1.4 KILLING METHODS

The killing of fur farmed species is regulated by the 'Council Regulation (EC) No 1099/2009 of 24. September 2009 on the protection of animals at the time of killing'. Provided that the killing is carried out in accordance with the regulation, the killing methods are considered humane by the scientific community¹². Note that fur animals are killed at the farm yielding a significant benefit to animal welfare as the transport to slaughterhouses, which is normally associated with a disadvantage to animal welfare, is avoided.

⁸ Møller *et al* (2011), 'Welfare in mink', Report no. 104: 4-5, Faculty of Agricultural Sciences, commissioned by the Danish Ministry of Agriculture.

⁹ Møller *et al* (2011), 'Welfare in mink', Report no. 104: 4-5, Faculty of Agricultural Sciences, commissioned by the Danish Ministry of Agriculture.

¹⁰ E.g. Ahola *et al* (2002), 'Effects of group size and space allocation on physiological, behavioural and production-related welfare parameters in farmed silver fox cubs', Agricultural and Food Science in Finland vol. 11: 185-197; Koistinen (2009), 'Farmed Blue Foxes' (*Vulpes lagopus*) need for a sand floor', Doctoral dissertation

¹¹ Marian S. Dawkins (2008), 'The Science of Animal Suffering', *Ethology*, International journal of behavioural biology 114: 937-945.

¹² Korhonen & Huuki (2012), 'Code of Good Practice for Humane Killing in Foxes', and 'Code of Practice for CO and CO₂ Euthanasia in Mink', MTT Agrifood Research Finland.

2. USE AND INTERPRETATION OF REFERENCES

Eurogroup for Animals' main arguments proposing poor animal welfare on fur farms are almost solely based on the 2001 report 'The Welfare of Animals Kept for Fur Production' which was adopted by the EU's Scientific Committee of Animal Health and Animal Welfare (SHAWAC).

In order to judge the validity of the report it is indeed very relevant to understand the enormous controversy the publication evoked in the scientific community when it was published. The working group behind the report was left out of the editing of the report and failed to influence the conclusions. This caused six of the eight scientists who formed the working group to issue a protest letter stating that:

The report is politically slanted against fur farming. Large numbers of references have been removed and it contains several errors of fact or interpretation, some of which are so ridiculous that they compromise the report's credibility (see Annex 1, 2).

Though the text of the report was not changed, a 14 page erratum with more than 300 missing references was later added to the report. The Erratum also read:

The working group drafted the report, which was then edited and amended by the Scientific Committee on Animal Health and Animal Welfare. The Scientific Committee is solely responsible for the final text, including the conclusions and recommendations and the members of the working group may therefore not necessarily agree with all parts of the report¹³.

The only other scientific reference Eurogroup for Animals use to stress poor animal welfare in the fur production is a Norwegian study¹⁴ which Eurogroup quotes for finding that *the majority of mink and foxes displayed fear, rather than trust in response to the tameness test*. It is of utmost concern to us to correct this misinterpretation. The study in fact states that the opposite is true for mink with 28% displaying fear, and almost none mink being aggressive:

The number of aggressive mink in the Norwegian population is insignificant with a number of 0,2%¹⁵.

Furthermore, 50,8% of the Blue foxes displayed good human-animal relationship in the tameness test (eating while being observed by a human), whereas the score was lower for Silver foxes with 32,7%. However, even if the eating test is valid for measuring temperament, the abstaining of eating cannot directly be interpreted as the animals being fearful (e.g. the animal may not be hungry), and when the criteria for scoring was changed to being less strict (eating when human observer left the position), 70% of the Blue foxes and 47% of the Silver foxes displayed good human-animal relationship.

The study indicates the progress already made in selection for tameness amongst mink and foxes. A key conclusion is that due to large variation between farms, there is a positive potential for future

¹³ 'ERRATUM to the report of the Scientific Committee on Animal Health and Animal Welfare adopted on 12-13 December 2001 on 'The Welfare of Animals kept for Fur Production'.

¹⁴ Hovland & Rød (2011), 'Lynnekartlegging av norske pelsdyr: resultater fra gjennomføring av fôrtesten på rev og pinnetesten på mink'.

¹⁵ Hovland & Rød (2011), 'Lynnekartlegging av norske pelsdyr: resultater fra gjennomføring av fôrtesten på rev og pinnetesten på mink'.

work on behaviour characteristics, a position also held by the Norwegian Fur Breeders' Association, who initiated the study for the same purpose. Furthermore, this option is also included in the WelFur programme, and the suggestion that the behaviour amongst fur farmed animals generally is problematic is contradictory to the study's conclusions.

2.1 UNDERCOVER FOOTAGE

Finally, Eurogroup for Animals build their case on a number of so-called undercover videos which are produced by members of the Fur Free Alliance (co-author with Eurogroup for Animals). These so-called 'investigations' are by nature biased in that the investigations are carried out by organisations with the political scope of banning all livestock activities including fur farming.

In fact, these videos have been obtained by illegally entering more than 500 European fur farms, and more examples than given by Eurogroup for Animals can be found on the internet. However, in all cases the circumstances of the recording of footage remains a secret, as the involved animal rights groups refuse to bring forward the original material. In this respect we cannot know, for instance, if the footage is obtained at the farm hospital meaning that the animals are already being treated.

The lack of validity of such footage has also been confirmed by the Danish High Court in a case where one of Eurogroup's references, Danish animal rights group Anima, accused a member of the board of the Danish Fur Breeders' Association for animal abuse.

These statements appear in their content as factual facts ("statements of facts"), and not as opinions in a broad sense ("value Judgements"). They are based on illegally obtained video footage that appears anonymous, without the ability to verify the authenticity of the recordings in any other way than to recording geographic location may be determined. The defendants have thus not been in necessary good faith on this basis to make statements of that nature. This is supported by the fact that conditions in [mink farm transferee] 's farm has not led to criminal proceedings, as the authorities by [journalist's] explanation had recently been on unannounced visit, where conditions were found in order¹⁶.

Only in very few cases known to the European Fur Information Center, out of the hundreds of accusations against specific fur farms, has the footage lead to a fine for violation of national animal welfare legislation. Likewise important is the fact that national animal welfare control authorities on a number of occasions have rejected that the images put forward by animal advocates represent the general image of fur farming, and that the image proposed by animal rights groups contradicts what professional inspectors and veterinarians find upon visiting fur farms:

During the fall, Mattilsynet has inspected a large number of fur farms. The results are only to a small extent in accordance with the image created in the documentary 'Et skinn av velferd' (A skin of welfare). The conditions in Norwegian fur breeding are generally in accordance with the legislation¹⁷.

¹⁶ Verdict of Danish High Court, Østre Landsret of 18th December 2012.

<http://www.domstol.dk/oestrelandsret/nyheder/domsresumeer/Pages/DomfraoestreLandsretomaereformaer-mendeudsagnomejerafminkfarm.aspx>

¹⁷ Mattilsynet, Norwegian Food Safety Authority (2009).

The review of Jordbruksverket is that the footage of widespread animal abuse cannot be confirmed, and, in general, poor animal welfare has not been ascertained during the controls that have been carried through¹⁸.

Fødevarestyrelsen has not been able to recognize the image which was revealed in the Operation X documentary about mink this fall¹⁹.

During the inspections, no sick or injured animals that needed to be put to death were found²⁰.

Regardless of the pain it inflicts to people when images of wounded animals are displayed, it is a given fact that no conventional livestock production is able to avoid that such incidents occur in populations of millions of animals. However, in the European fur industry such incidents are kept at a very low level in comparison with other animal industries. A revision of the existing literature on the subject revealed that approx. 0,1% of the pair-wise housed mink have serious wounds²¹. Similarly, when inspecting 422,176 mink in 2009, the Norwegian Food Safety Authority found serious damages in the form of wounds, inflammation, dead animals or disease in 0,078% of the animals.

3. CONCLUSION

The European Fur Industry has a very large focus on the continuing improvement of animal welfare at farm level. Not least is this focus cemented through the science-based animal welfare assessment programme WelFur which was voluntarily initiated by the industry in 2009. We would have hoped that such a groundbreaking pan-European initiative would be of interest to Eurogroup for Animals given that Eurogroup supposedly has a genuine interest in improving animal welfare in livestock productions.

The ignoring of all relevant, independent scientific literature concerning animal welfare for fur farmed species, combined with misinterpretations and constant references to a scientific report which's conclusions were abandoned by six of eight scientists behind, has lead us to believe that Eurogroup for Animals is indeed not the capacity on animal welfare issues which it promotes itself as being.

¹⁸ Jordbruksverket, The Swedish Government's Board of Agriculture (2010).

¹⁹ Fødevarestyrelsen, Danish Veterinary and Food Safety Authority (2009).

²⁰ Evita, Finnish Food Safety Authority (2010).

²¹ Steen H. Møller, Presentation at NJF Congress 2011, the Nordic Association of Agricultural Scientists.