

CERTIFIED CRUEL

Why WelFur fails to stop the suffering of animals on fur farms





Raccoon dog in wire-mesh battery cage, Poland, 2019. Otwarte Klatki

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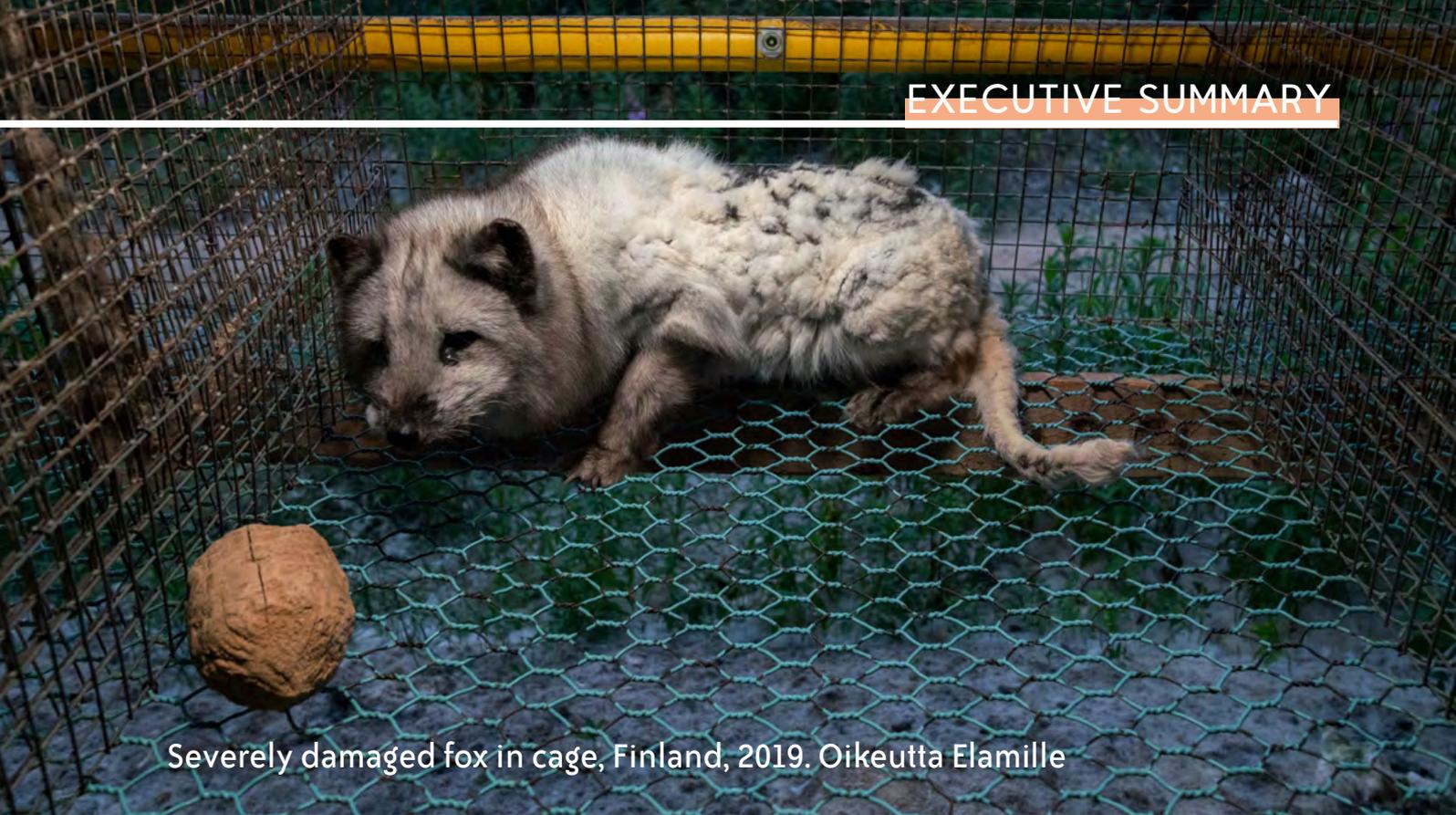
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- Animals farmed for their fur, such as foxes, mink and raccoon dogs are active, wide-roaming predators with complex biological needs. WelFur is an industry-led voluntary welfare certificate for fur farms that requires lower standards than the law in some EU countries.
- The intensive cage system on fur farms in the European Union has remained largely unchanged over the years. WelFur, which is designed around the current housing systems and current minimum level of European Union legislation, does not offer satisfactory or reliable solutions to the grave inherent problems of standard fur farming practices.
- The WelFur criteria do not require access to water for mink or sites for digging for foxes. As the ability to search for food in water (mink) and to dig (fox) are to be considered as natural behaviours and the motivation to carry out such behaviour probably is high, the WelFur criteria do not ensure that the species in question can realize their species-specific needs.
- The WelFur evaluation scheme combines different welfare measures into an overall score for a farm. This practice obscures individual measures and therefore allows serious welfare problems and injuries to be masked.
- The aim of the WelFur scoring system is to rank farms in relation to each other and to “current best practice”. The WelFur protocol does not assess animal welfare in relation to an “absolute” welfare level, nor is it assessing animal welfare on an individual animal level. It does not guarantee that individual animals do not suffer from poor welfare.
- Despite industry statements that assessments are undertaken by an independent third party, the Finnish Fur Breeders’ Association owns 38% of the stock of the company Luova which states it is in charge of auditing Finnish fur farms and several of its assessors also have ties to the fur industry.



Severely damaged fox in cage, Finland, 2019. Oikeutta Elämille

- In sum, the WelFur certificate has clear weaknesses both in terms of measuring animal welfare as well as in terms of auditing practices and independence from the fur industry. Therefore, WelFur should not be used as a standard for animal welfare within the EU nor recommended or promoted in any way.
- Numerous investigations have shown that practices documented on EU fur farms do not meet the most basic animal welfare needs, nor the 1998 EU legislation relating to animals kept for farming purposes.

RECOMMENDATIONS

WE CALL ON:

- European Union Member States, which still allow the farming of animals for their fur, to introduce legislation outlawing fur production at the earliest opportunity.
- The European Commission to act urgently to conduct audits to investigate the ample evidence of non-compliance with Directive 98/58/EC, taking into account the 1999 Council of Europe Recommendations, in all Member States where fur farming still occurs.
- EU and Member State policymakers to refrain from endorsing WelFur, or in any way integrating it into animal welfare policies.



Cage mink housed in close proximity to one another, Finland, 2019.
Oikeutta Elaimille

CHAPTER

1

INTRODUCTION



Fur farming is the practice of breeding animals for their fur. The animals used in the industry are wide-roaming predators, which have undergone only a very limited domestication process.

FUR FARMING

Animals such as foxes and mink are active carnivores that establish and defend large territories in the wild. In North America mink have been farmed since the end of the 19th century and in Europe fur farming was started in the 20th century. In Finland, the farming of raccoon dogs was attempted for the first time in the 1940s. However, raccoon dog production started properly as late as the 1970s and capture of wild animals was not forbidden by law until 1991 in Finland.¹ Other common farm animals were domesticated thousands of years ago.

Fur farming is dependent on the intensive confinement model, using battery cages. Fur farms globally are very similar to each other and all fur farms share the considerable animal welfare problems inherent in fur production: the inadequate size of the cages, the lack of stimuli, the lack of non-wire substrate to allow for key behaviours such as digging (foxes) or swimming (mink), the lack of opportunity for animals to withdraw meaningfully from the presence of other animals and the lack of provision of veterinary care or isolation for injured animals.

More than a dozen countries in Europe have banned or are phasing out fur farming because of the ethical and animal welfare problems involved.

This report is a critical analysis of a fur industry certification system called “WelFur”. The report shows deficiencies within WelFur in two areas: (1) its ability to measure and ensure animal welfare, and (2) the practices of auditing and transparency directly related to the certificate. WelFur is a fur industry-initiated voluntary certification scheme, with a stated aim of having all fur farms in Europe signed-up to its programme. The WelFur protocols are about “best current practice” - they do not offer alternative systems or new, more animal-welfare-friendly ways of fur farming. The inherent animal welfare problems of cage-based fur factory farming have not been addressed and so will continue to affect animals on fur farms, regardless of whether the farm is certified or not. As Heather Pickett and Professor Stephen Harris wrote in their report in 2015, the WelFur protocols reward the status quo, even where this is known to compromise welfare, rather than encouraging the development of systems



Fox cub in wire-mesh cage, Finland, 2019. Oikeutta Elaimille

with the potential to provide a higher level of welfare.²

EUROPEAN FUR FARMS

The most common species farmed for their fur are mink and foxes. In the European Union around 35 million mink, 2.5-3 million foxes, 160,000 raccoon dogs and 200,000 chinchillas are killed for their fur annually. The majority of the foxes farmed in Europe are arctic foxes, referred to as blue foxes in the fur industry. A smaller number of red foxes, referred to as silver foxes, are also farmed for their fur. Raccoon dogs are only farmed for their fur in Finland and Poland in Europe, but are a commonly fur-farmed species in China.

In the early decades of the industry, animals were kept in quite large enclosures where they were able to dig. Later, wooden floors were used. Finally, small cages with metal wire mesh floors were introduced. In current fur farming practices these wire mesh cages are either outdoors in open-sided sheds or in similar cage systems in large enclosed buildings. Cages are elevated above ground level and typically arranged in rows under a long roof. The common cage size for foxes and mink follows the Council of Europe Recommendations, which specify a cage size of 0.8 m² for an adult fox. For one adult mink, a nursing mink with kits, or two weaned mink kits, the minimum cage size is 0.255m² (without a nesting box). The cages are generally bare except for the temporary inclusion of a nest box for vixens and an elevated resting platform (commonly made of wire mesh) and an object (such as a wooden block) for gnawing for foxes, and

a nest box with some hay or straw for mink. Since the Council Recommendations do not cover raccoon dogs, there are no minimum written species-specific rules for the farming of these animals in the EU.

The number of animals varies from hundreds to more than 10,000 per farm, but the trend is towards larger farms. For example, in Finland the number of fur farms has fallen to almost one fifth since the 1980s, but production volumes have not decreased at the same rate: Currently around four million fur skins are produced in Finland annually, compared to 8.2 million in 1985.

EU LEGISLATION

Animals farmed for their fur in the European Union do not have their own species-specific legislation, they fall under the general 1998 Directive 98/58/EC Concerning the Protection of Animals Kept for Farming Purposes and Regulation (EC) No 1099/2009 on the Protection of Animals at the Time of Killing. The only species-specific information is contained in the Council of Europe Recommendations, published in 1999, which relates to foxes, mink and chinchillas, but not raccoon dogs. The 1999 Recommendations raised serious concerns about the welfare of animals farmed for fur in the intensive cage-based farming system, and the same problems were highlighted in the 2001 report of the Scientific Committee on Animal Health and Animal Welfare, which stated:

Current husbandry systems cause serious problems for all species of animals reared for fur.³



A SHORT HISTORY OF

Since 2000, when the United Kingdom became the first country to ban fur farming on moral grounds, seventeen European countries have either voted to ban the practice, have prohibited the farming of particular species, or have introduced stricter regulations that have effectively curtailed the practice. In addition, legislation to prohibit fur farming is currently being considered in Ireland, Montenegro, Poland and Bulgaria.

In some countries, like Germany, the introduction of stricter animal welfare regulations relating to fur farming, such as the provision of substrate for digging for foxes and swimming water for minks, has rendered the practice unprofitable and production has ceased. Swedish animal welfare regulations require foxes to be kept in such a way that they can be active, dig and socialise with other foxes while chinchillas need to have higher cages. This has effectively rendered both fox and chinchilla farming economically unviable in Sweden. Mink farming is, however, still allowed in Sweden. In Switzerland, fur farming is prevented by legislation which



LEGEND

- Fur farming ban
- Fur farming phased out (due to stricter regulations)
- Parliamentary debate

Illustration 1: Fur farming legislation in Europe

allows animals to be kept in captivity only under conditions that are equivalent to those required in modern zoos.

Public opinion polling from a large number of European countries has consistently demonstrated that the majority of citizens consider the breeding of animals for fur unacceptable.⁴

There is also a growing trend towards banning the trade in fur. Sao Paulo in Brazil introduced an import and sales ban on fur products in 2015 and two years later, India adopted an import ban on mink, fox and chinchilla fur skins. Following fur sales bans in a number of US cities, including Berkeley, San Francisco and Los Angeles, the state of California introduced a state-wide ban in October 2019.

WHAT IS AN INDUSTRY-LED CERTIFICATE?

In recent decades, the growing scientific evidence of the cognitive and social capabilities of animals and wider comprehension of their species-specific needs have undermined the legitimacy of fur farming. As the awareness of animal

ethics and rights have increased so has the opposition to the farming of animals for their fur. The fur industry has responded to criticism by focusing its communication on the development and promotion of various certification schemes. Most schemes require little or no more than what is legally required by national governments.

The WelFur scheme was initiated in 2009 by the European Fur Breeders' Association (now known as Fur Europe). According to the fur industry, WelFur is an animal welfare assessment and certification programme for fur farmed species developed by independent scientists and designed to provide reliable animal welfare assessment, consumer transparency and the improvement of animal welfare in the European fur sector. A stated objective of WelFur is "securing the future of the fur trade".⁵

WelFur is the latest of a number of industry-led certification programmes created by the fur industry, including Origin Assured and Saga Certification. It has been openly stated that certification is one of the key ways for the fur industry to fight the negative image of fur farming revealed by the work of animal rights and welfare organisations.⁶

Fur Europe claims that WelFur is based on the principles of the European Commission funded Welfare Quality® project and the programme is developed by independent scientists from seven European universities. This farm level certification scheme is said to consider "all important welfare parameters, including good housing, good feeding, good health and appropriate behaviour".

Despite these claims, WelFur is not able to address the serious welfare issues for mink and foxes farmed for their fur, the implementation and enforcement

concerns surrounding the current regulations and the issues associated with inhumane slaughter methods. WelFur does not address the welfare problems associated with the intensive, confined cage-based environment, as highlighted by the European Commission's Scientific Committee on Animal Health and Animal Welfare, which stated, in its 2001 report, that: "Current husbandry systems cause serious problems for all species of animals reared for fur".⁷

The assessments scores are "combined to calculate criterion scores standardized across countries. Criterion scores are then combined to calculate principle scores, and the farm is classified to one [of four] WelFur categories: best current practice, good current practice, acceptable current practice, or unacceptable current practice".⁸ This aggregation of different welfare measures into a single category, combined with a complex calculation obscuring individual outlier results, could easily lead to the masking of serious and persistent welfare shortcomings on farms.

The scheme's top score, "best current practice", still represents what most people would consider to be an unacceptable level of animal welfare. Alternative production systems with the potential for higher levels of welfare do not exist for mink, foxes and raccoon dogs. With domestic farm animals, alternatives to intensive cage-based production systems, like barn and free-range systems for laying hens, provide different levels of welfare, however, when it comes to farming animals for their fur, the WelFur program focuses only on the intensive cage-based production system.

Although WelFur does appear on a self-regulation database managed by the European Economic and Social Committee (EESC) the European Commission has

not endorsed the content of the scheme. Officials at the EESC have confirmed that the EESC database was not established to validate individual schemes, but to simply map self-regulatory schemes introduced by industry bodies and professional associations in the EU.

THE STRUCTURE OF THIS REPORT

In the first part of this report, we look at the legislation afforded to animals farmed for their fur in the European Union, highlighting clear deficiencies. This contributes to showing that WelFur, a protocol not even on par with EU recommendations, can at best only monitor the status quo of unacceptably poor animal welfare. In the second part of the report, we present an independent scientific analysis of the welfare criteria of the WelFur protocol. This analysis has been carried out by Swedish Professor emeritus Bo Algers. Professor Algers' research career in Animal Science and Veterinary Medicine has focused on the housing of farm animals and its effects on animal health, behaviour and welfare. His special research interest has been in the species-specific needs of farm animals and their welfare.

In the third part of the report we focus on the WelFur auditing process. We provide a case-study of the auditing system in Finland, Europe's largest producer of fur from foxes and raccoon dogs and the country that leads the development of WelFur. The fourth part of the report provides details of recent

investigations on fur farms certified as having “high welfare”, an evaluation of which has led Professor Alastair MacMillan to raise serious concerns as to both the welfare of animals kept for their fur in intensive cage-based systems, and the implementation and enforcement of the laws within Member States. In the conclusion, the central findings of the report are summarised.

To promote International Responsible Business Conduct (IRBC Agreements) the Social and Economic Council of the Netherlands published a factsheet on animal welfare in the clothing and textile industry, stating:

“

The WelFur certification system, governed by Fur Europe, is used for European mink- and fox farms. The certification does not cover some of the crucial animal welfare aspects, and an extremely low score on some criteria can easily be compensated by scoring high on other criteria.⁹

“



Mink standing in cage, Finland, 2018. Oikeutta Elaimille

CHAPTER

2

EU LEGISLATION
FOR ANIMALS
KEPT ON FUR
FARMS

Animals kept for fur farming, such as foxes, mink and raccoon dogs, are legislated for under the general 1998 Directive 98/58/EC Concerning the Protection of Animals Kept for Farming Purposes and Regulation (EC) No 1099/2009 on the Protection of Animals at the Time of Killing.

The only species-specific information is contained in the Council of Europe Recommendations, published in 1999, which relates to foxes, mink and chinchillas, but not raccoon dogs.

The 98/58/EC legislation is based on intensive cage-based farming, a system chronically unsuitable for providing any animals, domesticated or otherwise, with opportunities to express many key natural behaviours. Indeed, the 1999 Recommendations recognised the inherent problems of this system when they called for research to develop housing systems to better address the physiological and ethological needs of fur-bearing animals, including the provision of substrate for digging and, for mink, access to water.

Whilst successive investigations over many years by animal welfare organisations in several countries have never recorded the provision of such housing systems, they have revealed animals displaying a wide range of poor physical and mental symptoms, including conditions which appear to infer non-compliance with Directive 98/58/EC. Despite such findings, there is little evidence of action by the European Commission to investigate European fur farms' compliance with the Directive.

EU Directive 98/58 Annex Clause 7

“Where an animal is continuously or regularly tethered or confined, it must be given the space appropriate to its physiological and ethological needs in accordance with established experience and scientific knowledge.”

COUNCIL OF EUROPE

RECOMMENDATIONS

Published twenty years ago, the Recommendations recognised the welfare problems inherent to the confined caging environment on fur farms and called for research to:

“ develop housing systems... to enable animals to fulfil their biological needs... [that] shall include the need for... ”

“ **[FOR MINK]**
access to water for thermo-regulation and for swimming and other social and exploratory behaviour ”

“ **[FOR FOXES]**
the opportunity for climbing, hiding, digging, jumping and other exploratory, territorial and social behaviour. ”

The intensive cage-based housing system used on fur farms has been shown to be associated with severe welfare problems including physical and behavioural abnormalities such as self-mutilation, cannibalism and other stress-related stereotypical behaviour. However, instead of ensuring farms facilitate the systems detailed in the twenty-year-old Council of Europe Recommendations, the fur trade has instead, with its industry-instigated and industry-funded voluntary WelFur certification scheme, focused on identifying

the ‘least bad’ welfare in the context of the entirely deficient caged-based systems, and then labelling and rewarding this as ‘good’.

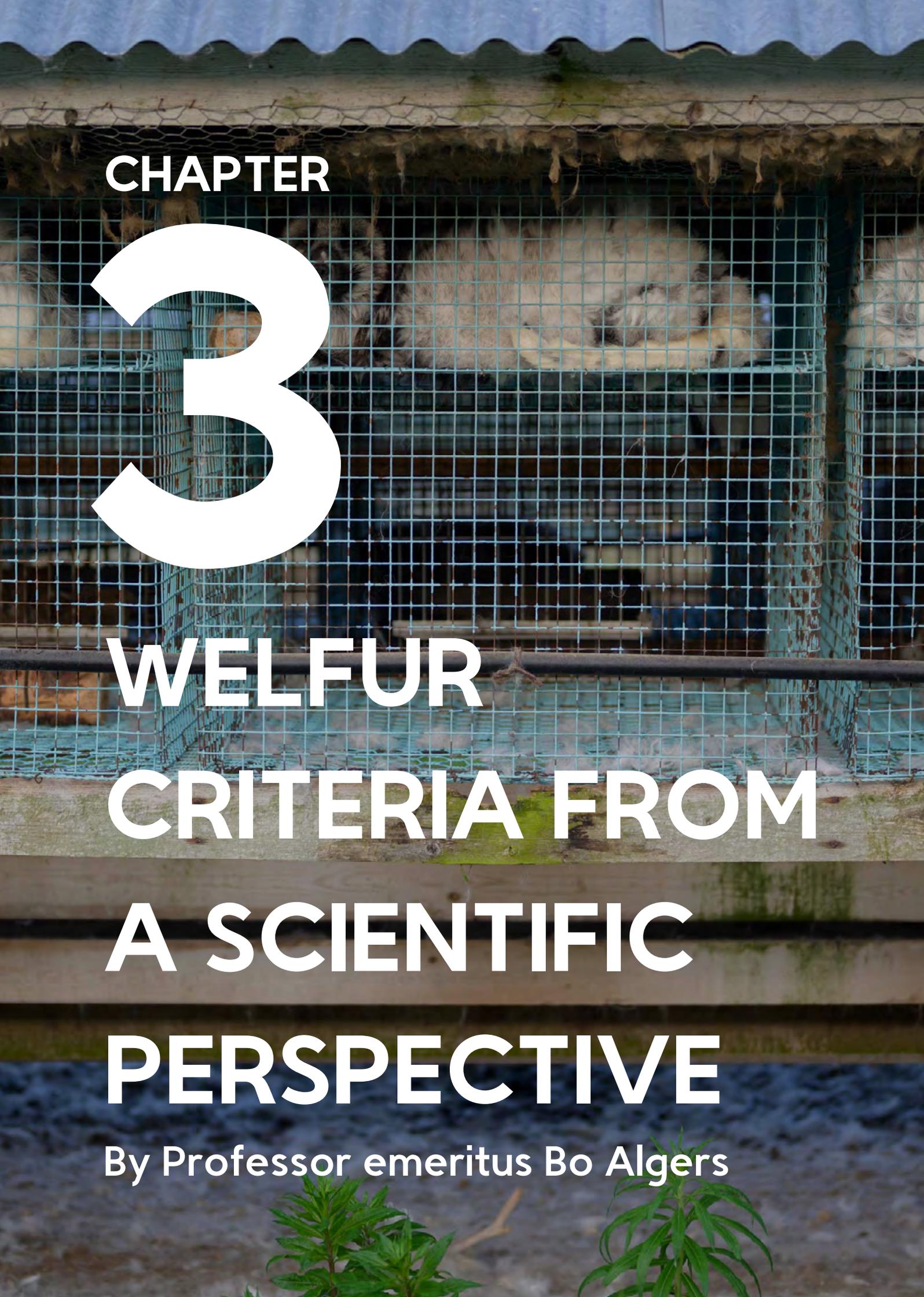
Given what is known about the needs of animals kept for their fur, current fur farming practices cannot meet the requirements of Article 4 of Directive 98/58/EC, as they are designed around the serious limitations of battery cage systems, restricting animals from expressing their species-specific needs, such as swimming for mink and digging for foxes.

Article 4 of Directive 98/58/EC states that Members States shall ensure that:

“the conditions under which animals (other than fish, reptiles or amphibians) are bred or kept, having regard to their species and to their degree of development, adaptation and domestication, and to their physiological and ethological needs in accordance with established experience and scientific knowledge, comply with the provisions set out in the Annex.”

The farming of mink and foxes for fur should be prohibited in accordance with Council Directive 98/58/EC

“No animal shall be kept for farming purposes unless it can reasonably be expected, on the basis of its genotype or phenotype, that it can be kept without detrimental effect on its health or welfare”



CHAPTER

3

WELFUR

CRITERIA FROM

A SCIENTIFIC

PERSPECTIVE

By Professor emeritus Bo Algiers

The Fur Free Alliance put the following questions to Bo Algers, a veterinarian and Professor emeritus in Animal Hygiene at the Department of Animal Environment and Health, Swedish University of Agricultural Sciences, to evaluate the WelFur scheme from the point of view of animal welfare.

Algers has been a member of the European Food Safety Authority (EFSA) expert panel on Animal Health and Welfare and adviser to the European Commission on education in animal welfare. He has also been part of the team researchers developing the Welfare Quality animal welfare assessment protocols.

QUESTION 1

How well do the WelFur criteria ensure that the species in question can realise their species-specific needs? (foxes and mink)

WHAT ARE SPECIES-SPECIFIC NEEDS?

In a paper by Jensen & Toates (1993) the question of species-specific needs is addressed and they conclude: “We reject the ‘catalogue approach’, but not the idea that there are needs which are best

described as ethological; in the sense that preventing an animal from carrying out a certain behaviour in a given situation might cause signs of suffering. There are probably needs associated with the performance of all species-specific behaviour and those are a complex of obtaining a goal and performing the motor patterns. Whether one wants to describe behaviour as a need therefore depends on a knowledge of the environmental context. Thus, a behaviour may be called a need in a particular situation.”

Jensen & Toates (1993) point out that whereas some behaviours are triggered by internal factors, other may have a mainly by external factors affected motivation. So, if an animal is presented with a certain environment, that environment could either trigger motivation (for instance to seek cold if in a very hot environment) or prevent motivation to increase (e.g. if animals are kept in a stable social group

and no aggression is triggered). Hence, an assessment system that would cater for all aspects of animal welfare should judge both if the housing and management environment at hand allows for the animal to carry out behaviours triggered in specifically that environment, but also if the animal is able to carry out those behaviours that are governed by internal factors triggering motivation.

Species-specific needs that are more related to motivation triggered by internal factors are e.g. dustbathing in hens, nest building in pigs and grazing in cattle. If those are prevented, behavioural phenomena appear such as wing flapping, pacing, bar biting and tongue-rolling, all being behaviours that are not seen unless the normal behaviours are hindered. Hence, an important approach to assess welfare in mink and foxes would be to measure to what extent those animals are able to perform such species-specific behaviours that are triggered by internal factors.

Welfare criteria that relate to species-specific needs

In the Welfare protocol it is stated about Appropriate behaviour;

Welfare criteria 10. Animals should be able to express other normal behaviours, i.e. it should be possible to express species-specific natural behaviours such as observing surroundings.

Welfare criteria 12. Negative emotions such as fear, distress, frustration or apathy should be avoided whereas positive emotions such as security or contentment should be promoted.

SPECIES-SPECIFIC NEEDS FOR MINK

For mink, the importance of the ability to swim and search for food in an aquatic environment has been discussed for many years but very little research has been performed. Much of the research has been studies of access to small water baths.

But what do mink use water for? To bathe? To body care? Or to hunt for food? Three completely different needs and three completely different motivation systems. Ahola et al. (2011) reported that with access to a simple water bath inside an extra cage with the dimensions 102 cm × 60 cm × 45 cm with 180 litres water with a depth of 30 cm, behavioural stereotypes in the minks progressed more slowly compared to cages without extra access to baths and cages with access to extra cage without bath. In all three groups, however, behavioural stereotypes developed.

Access to a small bath does not seem to resolve the issue of behavioural stereotypes. Under natural conditions, mink do not live in such environments that they only access a small bath. Therefore, the question of minks' need for access to water baths seems more academic than of practical interest.

A few studies investigating the mink's behaviour in to a semi aquatic environment have been published. Bagniewska et al. (2015) concluded that the mink was active in water for much longer winter season than previous laboratory experiments have shown. Bonesi et al. (2004) found that the otter to some degree outcompete the mink for hunt in water and as a result, the mink diet of terrestrial animals increased, however only in winter and not in spring.



Wild mink swimming. Source: Alamy

Fasola et al. (2009) in a later study could not find that the otter outcompeted the mink. Gerell (1967) found that wild mink in Sweden during wintertime usually consumed fish.

Harrington et al. (2012) studied the diving behaviour of wild minks in England and found that they performed to 189 dives per day ($X = 35.7$ dives / day), usually during the day and dived underwater up to 38.4 minutes per day ($X = 7.6$ min / day), not least during the coldest months of the year. Zschille et al. (2004) studied wild mink in Germany and found that their diet largely consisted of fish (38%), small mammals (23%) and birds (23%).

In one of the most interesting recent studies, domesticated minks at the age of 9 months were purchased from a commercial mink farm and released into two groups of 20

animals in enclosures containing a smaller pond, a short stream and a larger pond. The larger pond had an area of 20.5 m² and was 30 cm deep, the smaller was 4.9 m² and 80 cm deep and the stream had a length of 10.0 m, width 40 cm and the depth was 3-4 cm. The stream ran between the smaller and the larger pond and the system was fed with a pump. The authors (Schwarzer et al., 2016) reported that the mink to a high and increasing extent used all three of these facilities throughout the study. The water quality remained good through the study. They concluded that it was possible to keep young minks in a group with free access to swimming pools without any stereotypes. These scientific papers presented here all suggest that the mink has a strong motivation to utilize semi-aquatic environments, even when there is competition with otters, and in these environments search for food.

SPECIES SPECIFIC NEEDS FOR FOXES

Research on specific needs for the blue fox are mostly limited to cage rearing situations. E.g. Koistinen et al. (2016) analysed the willingness of blue foxes (*Vulpes lagopus*) to work for and utilise five resources: a platform, wooden block, sand floor, nest box and empty space. The authors concluded that the blue foxes valued the wooden block, nest box and sand floor more than the platform or an empty cage. After entering the resource cage, the foxes started interacting fastest with the sand floor, showing high motivation to interact. After entering the resource cage, the foxes make use of the roof of the nest box more urgently than the interior of the nest box. However, results such as these relate poorly to questions on needs for foxes to socialize, use larger space or to dig in a more rewarding environment.

In a study of family housing of farmed silver foxes, Ahola et al. (2000) pointed out the raised concern about animal welfare increasing the pressure to develop new housing environments for all farmed animals including foxes aiming to increase the welfare of animals by constructing housing systems that would better fulfil animals' behavioural needs. They refer to the Council of Europe Recommendations (1999) stating that each weaned fox should have access to a secluded area such as a resting platform or a nest box.

These recommendations have prompted many studies on the effects of these constructions on foxes' welfare to be conducted (Mononen et al. 1996). The Council of Europe (1999) further states that under natural conditions red foxes jump well and run fast, and often live socially with individuals known well to one another but

are sometimes solitary. According to these biological characteristics of the species, it is recommended that foxes should be provided with sufficient space to carry out normal locomotor behaviour, and that individuals should be able to express social behaviour.

However, there are few studies examining the raising of silver foxes in larger housing systems (Pedersen and Jeppesen 1998) or in groups (Ahola et al. 1996; Krzywiecki et al. 1996), and the results of the studies are controversial.

Ahola et al. (2001) aimed to evaluate the effects of housing farmed silver foxes in large outdoor enclosures with less abundant human contacts on some behavioural and physiological welfare parameters. Farmed silver fox cubs were housed either singly in traditional fox cages or in sibling groups in enclosures. Their conclusion was that the housing system had significant effects neither on the serum cortisol level after ACTH administration nor on the mass of adrenals. This result shows that intra-group social tension and non-habituation to humans, both leading to increased long-term stress in foxes housed in large outdoor enclosures, can be partly overcome by, respectively, altering the group composition and keeping the cubs for a longer time in cage conditions with close human contact. However, a large number of bite scars and increased stress-induced hyperthermia (SIH) in the foxes housed in enclosures, indicating an acute stress response to the presence of humans, may not be overcome. Furthermore, the 24-h activity rhythm changed in the foxes housed in large enclosures resembling, especially in November, the nocturnal activity pattern of the wild red fox, indicating that the foxes in enclosures became at least to some extent feral."



Two foxes housed next to each other laying on cage shelves, Finland, 2019. Oikeutta Elaimille

Ahola and Mononen (2002) monitored the behaviour of farmed silver foxes housed in family units in enlarged cage systems from weaning until late October. Activity of family members, use of space available, and aggressive acts were recorded. Aggressiveness between family members increased from July until October, leading to a more scattered use of the available space. Furthermore, the mean activity level of family members increased, and the synchrony of activity decreased. They concluded that social tension in the fox families increased gradually during the autumn, leading to dispersion of the family members.

Hovland et al. (2010) studied group housing of foxes. The aim was to investigate the consequences of housing adult silver fox vixens in triplets of various age compositions on their agonistic behaviour,

body weight gain and bite injury level following the first hours and days after mixing in triplets. They concluded it to be most likely that adult silver fox vixens experience the initial phase of social housing as stressful.

One explanation for a lack of interest in group housing of silver foxes may stem from previous experiences in fox farming. During the early years of fox farming in Finland as well as in other countries, silver foxes were typically raised in groups in semi-natural, soil floored pens with up to 100 m² of floor area and an underground den. However, it was soon realized that in these conditions, as in nature, intestinal parasites were found in almost every fox, fights between individuals were common, cub mortality was high in damp, underground nests and foxes did not habituate to the presence of humans

(Forester and Forester 1973). During the following decades, the recommended housing system of that time became the standard practice in fox farming. Therefore, given the information to hand at that time, fur farmers and experts agreed that, to ensure better health conditions, foxes should be kept in wire-floored cages either alone or with a limited number of individuals per cage (Broberg and Puustinen 1931).

At present, silver foxes are housed after weaning mostly alone, sometimes in pairs, in wire mesh cages in outdoor sheds. The authors (Ahola et al., 2000) concluded that if group housing of silver foxes in large enclosures is to be included in fur farming practice, more research is needed to overcome the problems highlighted by their results. The fear of humans in enclosures may be decreased either by habituating the animals to humans (Pedersen 1994) or by selecting them for confident behaviour (Rekilä et al. 1999). On the other hand, social tension within families may be avoided by changing the composition of the families; e.g. a vixen could be raised only with her daughters or male cubs could be taken out of the group in the early autumn.

It has been argued that one species specific need of foxes is to dig. Korhonen et al. (2001a) performed a study on digging and reported: "A recent European animal welfare recommendation stresses the importance of studying digging behaviour in farm-born blue foxes (*Alopex lagopus*). The current study was conducted (1) to clarify the extent of digging and (2) to evaluate factors that motivate digging. In Experiment 1, six juvenile male blue foxes were housed together from August to the following June in an earthen enclosure. Experiment 2 was conducted from July to December, using ten enclosures each containing

two juvenile male blue foxes. Behaviour was monitored by 24-h video recordings and visual observations. Progress of digging was also followed by making scale drawings of all digging marks on paper. As early as the first study day, clear signs of digging were observed. Digging sites were concentrated below and close to nest boxes and pen walls. Maximally about 20% of the total enclosure area was affected. The total surface area of digging sites did not increase from late summer onwards because foxes tended simultaneously to cover part of the old sites when digging new ones. Motivational tendency to dig varied with time. Digging activity decreased during autumn and almost totally ceased during winter. In May, foxes resumed digging activity. Digging motivation was evaluated by two means: (1) by analysing digging purpose (Experiments 1 and 2), and (2) by the damming-up test (Experiment 1), that is, after 10 months foxes that had been exposed to the earthen floor were transferred for 12 days into wire-mesh cages with no possibility to dig in the ground. Thereafter, foxes were transferred back into the earthen enclosure to measure the rebound of digging following deprivation. Foxes were observed to dig for the following reasons: (1) to make a hole or a resting site, (2) to locate an escape route, (3) to cache food, faeces, or sticks, (4) in response to a novel object (new nest box, replacement of nest box), and (5) displacement without any clear goal. Daily time spent digging averaged 7 minutes and 17 minutes per fox in Experiments 1 and 2, respectively. A clear rebound effect for digging was not identified. It can be concluded that digging is a complex behavioural pattern caused by a variety of motivations that can vary over time. The present study was unable to show unambiguously that digging is an important need for farmed foxes."



Wild fox. Source: Roger Brendhagen

The current situation of the knowledge of needs for farmed foxes to dig seem parallel to that of the knowledge of the need for sows to build farrowing nests in the early nineteen-eighties. In those years, it was assumed that the highly-domesticated sow did not even build farrowing nests. But research undertaken showed rapidly that sows, even with a previous experience of being crated for four consecutive farrowings without nest material, once released into semi natural enclosures, performed extensive nest building behaviours (Jensen, 1989) and other studies could confirm physiological traits that related to such behaviour (Algers & Uvnäs Moberg, 2007).

A study (Koistinen et al., 2007) using operant conditioning where the foxes had to work for access to an earth (dirt) floor showed

that blue foxes are motivated to work for access to such resources.

Other research has merely studied how fittings in cages could stimulate digging behaviour without any conclusive results (Korhonen et al., 2001b).

CONCLUSION

As ability to search for food in water (mink) and to dig (fox) are to be considered as natural behaviours and that the motivation to carry out such behaviour probably is high, the WelFur criteria do not ensure that the species in question can realize their species-specific needs.

QUESTION 2

Does the WelFur scheme's combining of different welfare measures into overall scores, obscure individual measures and therefore allow serious fails to be masked?

In any complex system made to assess animal welfare at herd level as a general score, the proportions of animals affected, in a number of different scoring categories, are estimated. In a critical study Lundmark et al. (2015) conclude that systems based exclusively on group assessment would, if defined narrowly, not be in line with the intentions of a legislation that requires acceptable conditions and outcomes for every individual animal.

As an example, in a presentation of the WelFur project the authors (Mononen et al., 2012) write: "Using the Welfare Quality project and protocols as a model has been an extremely productive approach in developing the WelFur on farm-welfare assessment protocols for foxes and mink. The present WelFur fox and mink protocols include 15 and 9 animal-based measures, and 11 and 13 input-based measures, respectively. For both foxes and mink, each of the four Welfare Quality principles is judged by at least one criterion, and seven out of the 12 criteria include animal-based measures. The percentages of animal-based

measures, 58% for the fox and 41% for the mink, are slightly lower than in most of the WQ protocols (Welfare Quality® 2009 a,b,c). However, the protocols are sufficient for testing the implementation of WelFur. Our experience from the pilot studies that started in 2011, will lead to refining the measures and improving the protocols as a whole."

In the Foxes protocol, page 21-22, it is explained: "Use of alarm and warning thresholds applied to the Criterion Absence of disease in foxes: during the farm visit: % of foxes with severely bent feet, % of foxes with clear ocular inflammation, % of foxes with impaired mouth and/or teeth health, % of foxes with clear evidence of diarrhoea, % of foxes with clear evidence of reddish/brownish urine, % of obviously sick foxes." Interestingly, the concept "sick" is separated from "bent feet", "ocular inflammation" "teeth health" "diarrhoea" and "miscoloured urine. There is an "alarm" threshold level set at 0,5% for "sick" animals but up to 15% for "bent feet" and "diarrhoea".

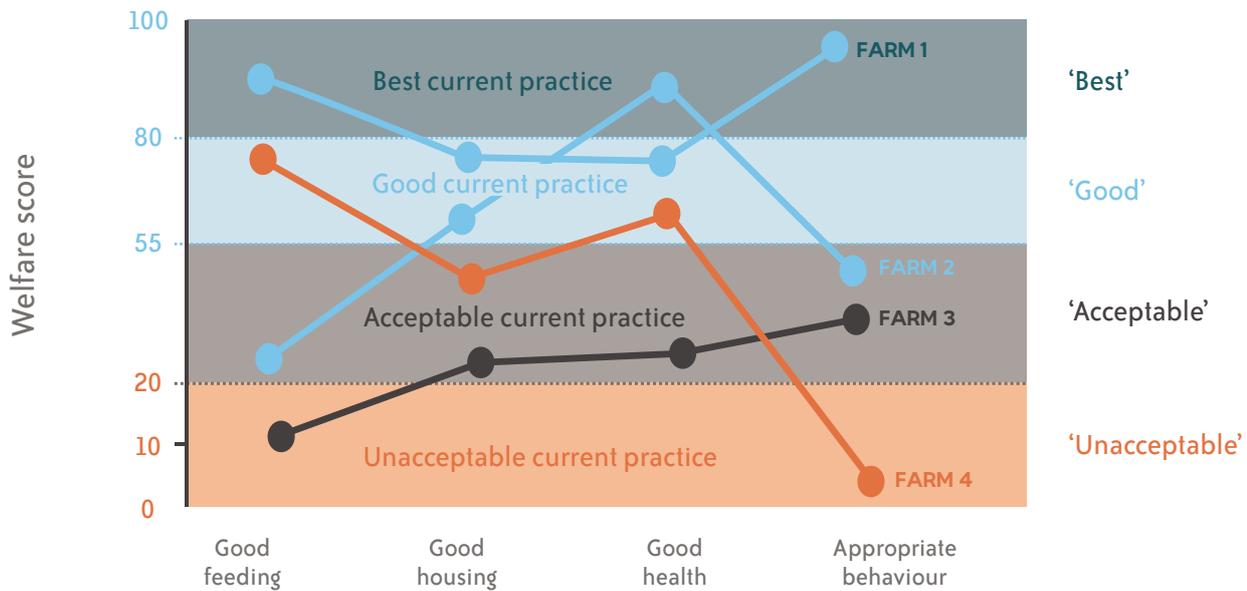


Illustration 2: Figure 5 examples of farms in the four welfare categories

On page 24 in the Foxes document it says:

“We transposed the rules used in Welfare Quality® to produce an overall welfare assessment of farms. However, contrary to Welfare Quality®, the names of the classes have been changed because we believe that an animal production can never be excellent and that the key reference point is the best current practice according to the experts.

Briefly, a farm is classified in one welfare category according to its principle-scores (Figure 5):

- A farm is considered to correspond to ‘Best current practice’ if it scores more than 55 on all principles and more than 80 on two of them.
- A farm is considered to correspond to ‘Good current practice’ if it scores more than 20 on all principles and more than 55 on two of them.
- A farm is considered to correspond to ‘Acceptable current practice’ if it scores more than 20 on three principles and more than 10 on the remaining principle.
- Other farms are considered to correspond to ‘Unacceptable current practice’.”

In figure 5 they present calculations of the final assessment outcome. “Farm 3” scoring “Unacceptable current practice” on Good feeding still is regarded “Acceptable”. This is just one example of how any version of this type of assessment system is relativizing animal welfare.

Any system developed to assess “farms” rather than individual animals’ level of welfare will contain measures that one way or another allows some individual animals to have some welfare problems. What may be dealt with in such a farm assessment system is to what extent such individual animal welfare deficiencies are allowed to affect the ultimate final score of the farm. As nowadays farms generally holds a large number of individual animals, single individual animals may suffer from rather poor welfare and yet, the farm may show a favourable outcome in an assessment system based on “farm welfare”. Animal welfare legislation in Europe is designed to protect the individual animal. Clearly, the WelFur protocol allows for individual animals to have poor or even very poor welfare and yet the farm may score high in the final assessment. Lundmark et al. (2015) conclude that “systems based exclusively on group assessment would, if defined narrowly, not be in line with the intentions of a legislation that requires acceptable conditions and outcomes for every individual animal.”

When the Welfare Quality concept was developed, the aim was never to address if farms were in line with the current animal welfare legislation. Rather, it was developed as a tool valid to assess to what extent the animals are kept in accordance with some welfare criteria, but also to rank farms in relation to each other, the latter to create incentives for an improvement of animal welfare on farms.

CONCLUSION

The WelFur schemes combining of different welfare measures into overall scores obscure individual measures and therefore allow serious cases of individuals suffering

from poor welfare to be masked.

QUESTION 3

Can the WelFur criteria be considered on par with contemporary scientific welfare thinking?

Three aspects of animal welfare are highlighted here; positive welfare, natural behaviour and studies of stereotypic behaviour.

POSITIVE WELFARE

Much of contemporary scientific welfare thinking relates to issues of what is considered good or positive welfare. Developments in neuroscience and behavioural science during the last 10–15 years have together made it increasingly apparent that sentient animals are potentially much more sensitive to their environmental and social circumstances than was previously thought to be the case. In a review Mellor (2015) concludes “Using ‘what animals want’ as a reference standard has the appeal of focusing on the specific resources or conditions the animals would choose themselves and can potentially improve their welfare more quickly than the approach of making small increments above baseline standards.” He concludes that the “cautious use of these approaches in different combinations could lead to recommendations that would more effectively promote positive welfare states in hitherto neglected areas of concern”.



Fox in cage laying on wire floor, Latvia, 2019. Animal Freedom Latvia

Research shows that what could be considered of positive value for the animal could be measured by studying play, exploration, grooming affiliative behaviour, synchronization, body posture and facial expressions (Keeling, 2019). These indicators are not yet developed to the extent that they readily could be used in an official animal welfare protocol for fox and mink, but would, if they were, substantially contribute to a more holistic judgement of the animal welfare at hand.

NATURAL BEHAVIOUR

In 1965, the Brambell Commission stressed in its report the importance of animals having their behavioural needs met (Rushen, 2008). The Brambell Commission report also formulated the basis for the so-called five freedoms and one of these freedoms were the freedom of “normal behaviour”. The freedom to practice “normal” or “natural” behaviour is based on the assumption that animals have behavioural needs (Jensen & Pedersen 2008).

“Normal” behaviour can be attributed to the behaviours that animals perform in the wild or behaviours of animals kept in a certain housing condition but that this in itself need not be something positive from an animal welfare perspective. There is no benefit to an animal from a welfare perspective to be forced to defend against predators in times of starvation. However, this can be considered as a normal behaviour in nature (Algers 2008).

Many researchers have considered that one of the most important aspects of behavioural need is the strength of the motivation that the animal has to perform the behaviour. For example, Dawkins

(1990) considers that it is important from an animal welfare perspective to investigate how strong the motivation in animals is for different behaviours. One way to do it this is to allow animals to “work” for the opportunity to perform different behaviours (Dawkins 1990). Such studies have e.g. demonstrated that chickens are prepared to work to gain access suitable material to dust bathe (Gunnarsson et al. 2000), pigs are prepared to work for straw (Matthews & Ladewig 1994) and that minks are prepared to work to access water (Mason et al. 2001).

Studies of how wild animals

behave during a day can also provide valuable information about the animal’s choices or preferences between different behavioural alternatives (Dawkins 1988). Motivation is something that can be temporary or long-lasting. It is also something that can be linked to a specific event in an animal’s life such as nest building in sows at farrowing or something that occurs daily such as dust bathing in chickens (Algers 2008).

It is well documented that if highly motivated behaviours are hindered or their function is blocked, stress and frustration appear and effects may be harmful resulting in injuries or disease (Algers, 2008).

STEREOTYPIC BEHAVIOURS

Mason (2006) e.g. presents an overview of Stereotypic behaviours and their relation to animal welfare.

Stereotypies are considered an abnormal behaviour and is sometimes seen in captive animals, particularly those held in small enclosures with little opportunity to engage in more normal behaviours. These



Mink housed together in battery cages, Finland, 2019. Oikeutta Elaimille

behaviours may be maladaptive, involving self-injury. Examples of stereotypical behaviours include pacing, rocking, excessive sleeping, self-mutilation, and mouthing cage bars. Stereotypies are seen in many species, including primates, birds, and carnivores.

Stereotypical behaviours are thought to be caused ultimately by artificial environments that do not allow animals to satisfy their normal behavioural needs. Rather than refer to the behaviour as abnormal, it has been suggested that it be described as “behaviour indicative of an abnormal environment.” As stereotypies are frequently viewed as a sign of psychological distress in animals, there is also an animal welfare issue involved.”

Stereotypical behaviour can sometimes be reduced or eliminated by environmental

enrichment, including larger and more stimulating enclosures, training, and introductions of stimuli (such as objects, sounds, or scents) to the animal’s environment. The enrichment must be varied to remain effective for any length of time.

In a critical review of the use of stereotypies in welfare assessment, Mason and Latham (2004) are emphasizing an oversimplified use of behavioural stereotypies and also point out that non-stereotyping animals may also suffer from poor welfare.

To properly assess the occurrence of stereotypies, a proper methodology is needed. In the WelFur Mink protocol observation of stereotypic behaviours is described as follows: “During observation, the observer keeps a distance from the mink, for example, by observing the mink

from the parallel row or a nearby shed to minimise the impact of the observer on the mink. Let the mink habituate until they do not pay attention to the presence of the observer, before starting the registration of stereotypic behaviour (usually a few seconds but one minute maximum).

Observe the cage-section for 2 minutes and note the number of mink per cage that were active and the number of mink that performed stereotypic behaviour within the 2 minutes (3 or more repetitions). Depending on the layout of the shed, one or two sections of battery type pens typically of 6 cages each can be observed at the same time.

Mink are primarily active at dawn and at dusk and before feeding, which makes it important to synchronise the observations in practise. In order to overcome the variation in stereotypies during the day due to daily rhythm in the minks' activity or between periods due to the feeding strategy, the observation of stereotypies in all three periods is performed from 1 hour before the usual (expected) time of feeding. If the observations cannot be completed before the time of feeding, ask the farmer to postpone the feeding until the observation of stereotypic behaviour is completed as the mink should not be able to hear the feeding machine during the observation."

In the Foxes protocol, it is described that after having spent much time just by getting acquainted with the owner, routines and after inspecting all sheds, a three to five hour period is used to assess a lot of parameters. These are Body condition scoring, Cleanliness of the fur, Difficulties in moving, Skin lesions or other observed injuries to the body, Bent feet,

Ocular inflammation, Impaired mouth and teeth health, Diarrhoea, Urinary tract infection, Obviously sick fox, Fur chewing, Social housing, Continuous water availability, Availability of a platform, Space available for moving, Opportunity to use enhancement, Opportunity to observe surroundings and finally Protection from exceptional weather conditions.

Entering an assessment of the occurrence of behavioural stereotypies at a time when the farm is visited by a, to the animals, novel person, having walked around the farm and thus given a major input of stimuli to an environment of the animals that must be judged to be utterly barren is going to underestimate the occurrence of stereotypies.

When looking at with what methodology this information was gathered in the WelFur scheme it is indeed doubtful if any accurate information about the occurrence of stereotypies can be gathered. The methodology is absolutely crucial for the result of how studies of behavioural stereotypies are conducted. Since it is well known that new stimuli reduce the prevalence of stereotypes, it is decisive whether animals via smell, sight or hearing experience new stimuli e.g. in the form of an observer, which in this case may reduce the prevalence of stereotypes. In order to safely study the occurrence of behavioural stereotypies, video surveillance must be used and only after a period has elapsed since the equipment was fitted.

The study of occurrence of behavioural stereotypies in accordance with the methodology described in the WelFur Mink and Fox protocols is probably not assessing a true value but rather a value



Raccoon dog in nest box on fur cage farm, Poland, 2019. Otwarte Klatki

that risks underestimating the occurrence of stereotypies and which should only be used as a relative measure between farms.

CONCLUSION

There is obviously no assessment of digging behaviour for foxes and swim behaviour for mink in the WelFur protocols as they are not developed to study all aspects of natural behaviour and motivation for such behaviours. Rather, the aim of these protocols are to be able to rank farms in relation to each other and to situations of a 'best current practice' on fox and mink farms given the present housing systems used. Thus, the WelFur may be appropriate for ranking existing farms but not to assess whether or not individual animal welfare is at hand.

OVERALL CONCLUSION

The WelFur protocol was developed by independent researchers in collaboration with the fur industry to allow for an assessment of animal welfare on farms. The WelFur protocol is not an assessment of animal welfare in relation to an "absolute" animal welfare level, nor is it assessing animal welfare on an individual animal level. The WelFur protocol can only be used to rank existing fur farms on principles relating to current best practice and animal welfare. It should be noted that a WelFur assessment does not guarantee that individual animals do not suffer from poor welfare.

CHAPTER

4

QUESTIONS
ABOUT THE
WELFUR AUDITING
PROCESS

A professional, reliable, and unbiased auditing process is a key element in any certification system. In this chapter, we raise questions on the independence and transparency of the WelFur auditing process on fur farms in Europe.

The WelFur programme is a voluntary scheme, initiated and funded by Fur Europe, a European umbrella organisation of national fur breeders' associations representing the European fur sector. Baltic Control, a Danish-based company that offers auditing, verification and certification services for food and food related supply chains, has been appointed as the independent third-party assessment company to manage the audits of WelFur farms in different countries. In 2018, Fur Europe's Mette Lykke Nielsen told the UK's Environment Food and Rural Affairs Committee:

They [Baltic Control] are the ones going out and performing the tests on the farms.¹⁰

However, Baltic Control is not directly carrying out the audits in all of the European countries, but is using sub-contractors instead. Baltic Control is also responsible for reporting any breaches of national or European Union law found during the inspections. To be able to do this, all the reports and data from assessed fur farms should be immediately input to a WelFur

database.¹¹

Transparency is a concept that is often used when corporate social responsibility and industry-owned certifications are discussed. The Fur Free Alliance has looked into whether and where results of the auditing process are published, who carries out the audits, what the consequences are for failing an audit, and what process is in place for non-certified and/or non-compliant farms. It must be noted, that it has not been possible to obtain information on all the sub-contractors or practices related to failing an audit.

In 2017, CEO of Fur Europe Mette Lykke Nielsen, said:

It has been important for us that both the science behind WelFur as well as the farm assessments are 100 percent independent from the fur sector itself.

Nielsen added: "The credibility of the system is vitally important, and fur farmers who fail to receive the WelFur certificate from inspection body Baltic Control will

not be allowed to sell their skins through the international fur auction houses, which effectively puts fur farmers with insufficient animal welfare standards out of business”.¹²

In 2017 Fur Europe stated that “WelFur also works as a management tool that can improve animal welfare standards on fur farms”, adding that national WelFur advisory systems are being set up “to work in cases where fur farmers fail to obtain the WelFur certificate in order for these farmers to improve procedures and get the welfare standard up to the sufficient level”.¹³ A newsletter by the Dutch Fur Breeders Association states:

Should a check fail for whatever reason, you will have more than enough reruns.¹⁴

It is not clear from the literature how often a farm will be allowed to fail while still being considered for WelFur certification.

The European-wide implementation of WelFur started in January 2017 and the objective was “to certify each of Europe’s 4,000 mink and fox farms in the course of three years”.¹⁵ In December 2019 it was stated by Fur Europe that “2,918 fox and mink farms across 22 European countries have been assessed in the period 2017-2019, which concludes the implementation phase”. Fur Europe also stated that “two percent of the fur farms did not achieve a WelFur certificate”.¹⁶ It remains unclear at the time of writing what now happens to those 1,000-odd fur farms which have not been certified. Are they still able to sell their pelts at the European fur auction houses,

and what happens to the pelts they have produced?

Finland and Denmark have the highest numbers of fur farms in Europe and are home to the two leading European fur auction houses (Saga Furs in Finland and Copenhagen Furs in Denmark). When WelFur standards were elaborated, a Finnish professor coordinated the project to create the protocol for foxes and a Danish senior scientist lead the project on the mink protocol.¹⁷ According to the fur industry, in 2019, most of the farms in both Denmark and Finland had already been audited at least two times. To obtain the WelFur certification, a fur farm must be visited by auditors at least three times in the first year and then undergo an annual check thereafter.

“

CASE FINLAND

Finland is a country with approximately 1,000 fur farms, from which around 4 million fur animals are bred each year. It is the largest producer of fox and raccoon dog fur in Europe, only China produces more fur from these animals annually.¹⁸ The Fur Breeders’ Association FIFUR boasts that nearly 100% of Finnish farms are members of the organisation. It also relies strongly on claims of sustainability, traceability and transparency: “The mission of FIFUR is to support the well-being of breeders, animals and the environment, thereby safeguarding the future of fur farming”, it states in a brochure on sustainability.¹⁹

Finland is also a pioneer of fur farm certification systems with a history of certification dating back to 2005, the WelFur programme being the latest of these fur farming certificates in Finland.

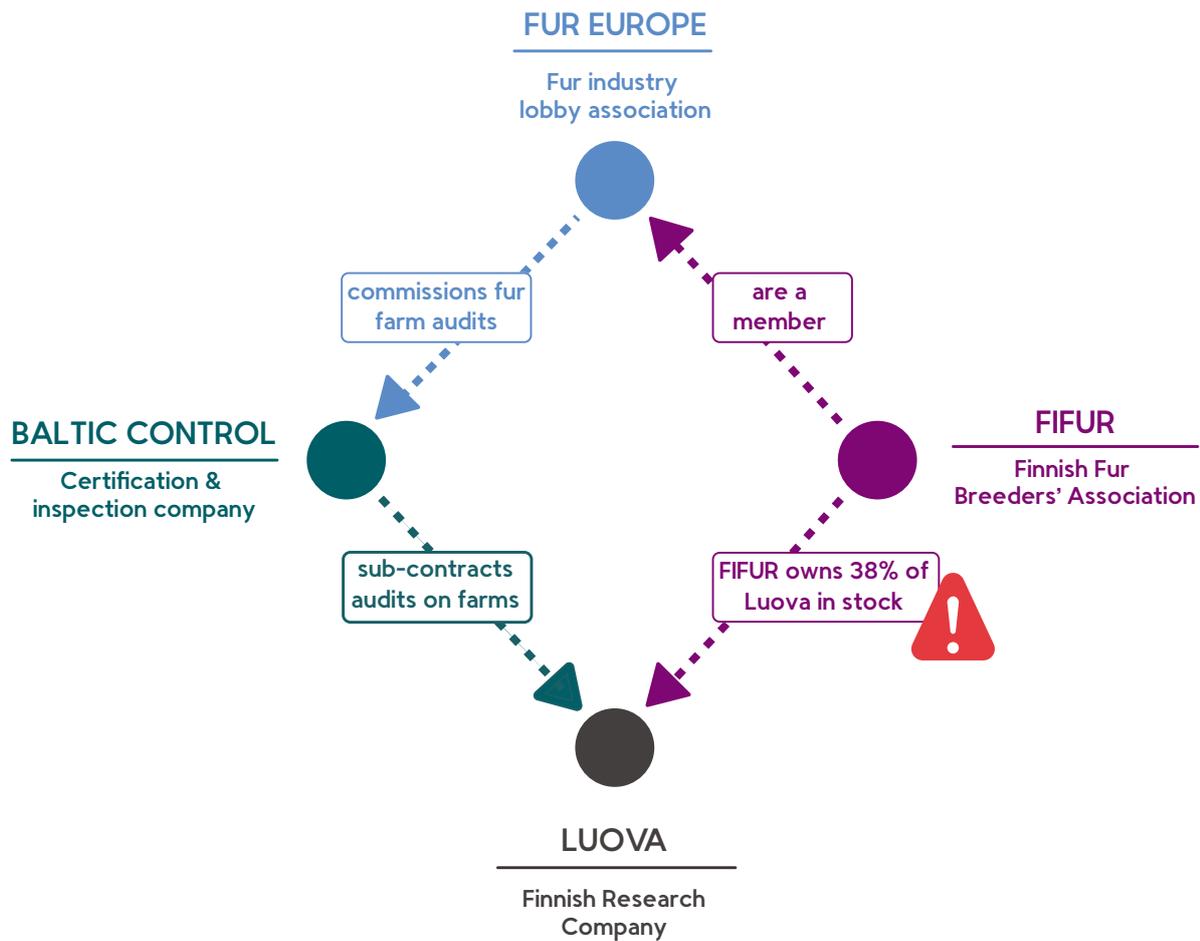


Illustration 3: Financial ties between fur industry and auditing companies.

Finland is therefore a good case study to look at when trying to get insight into the WelFur scheme. How well does the WelFur protocol work in a country with an organised industry claiming to be ethical and transparent?

LUOVA

Fur Europe states in a brochure on WelFur that the certificate is based on “[t]hird party assessments undertaken by the independent global certification body

Baltic Control”. Baltic Control is said to be “responsible of concluding the contracts with individual farmers, assuring that all assessors have received a specific assessment training including a test, and carrying out the assessments according to the WelFur programme guidelines”.²⁰

It is not mentioned in the brochure that Baltic Control is using sub-contractors to carry out these assessments, for example in Finland.

The Finnish research facility
Luova states on its website that it “focuses on research, product development and practical schooling services. Starting from

the spring of 2017, Luova also acts as a subcontractor to Baltic Control which carries out WelFur audits in Finland.” Luova lists a group of assessors on its website.

What is interesting about Luova is that 38% of its stock is owned by the Finnish Fur Breeders’ Association. As a sub-contractor, Luova takes care of Baltic Control’s responsibilities, but unlike Baltic Control, Luova is directly linked to the fur industry. This seems like a textbook example of a conflict of interest.

In a brochure on sustainability from 2019, The Fur Breeders’ Association (FIFUR) states that WelFur audits are performed by Luova, that operates as a sub-contractor for the international auditing company Baltic Control:

FIFUR owns 38% of Luova’s stock. The ownership of FIFUR does not affect the impartiality of the audit activity.²¹

There is no further explanation as to why the ownership would not affect the impartiality of the auditing. As Luova states that they have been in charge of auditing since 2017, it seems that the majority of Finnish farms have gone through the WelFur auditing carried out by an auditor owned partially by the fur industry.

What is even more curious, is a job application for assessors which appears to value interest in and/or experience on a fur farm yet doesn’t mention a need for the appropriate scientific skill base

in order to complete the assessment protocol and complicated scoring system. A job announcement published at the very beginning of Finnish WelFur audits in 2017 looking for WelFur assessors lists under “qualifications” the following: “As an assessor, you ought to show interest in the fur industry. One advantage is if you have practical experience of working on a fur farm. You should have a driving license and access to a car. Proficiency in Finnish and English is counted as merit. The auditors are trained into their new job at the end of April”.²²

In addition, this job application does not appear to reflect the principle stated explicitly in a WelFur briefing published by Fur Europe:

WelFur assessors cannot be connected with a farm. Should they have been working on or with a farm in the past, they need to respect a 2-years away period in order to be eligible for becoming a WelFur assessor.²³

“

“

Illustration 4: Brochure of the research company Luova (2020)

Assessorer

Finska assessorer

██████████ – området Kaustinen/Veteli/Halsua/
 Etelä-Pohjanmaa / ██████████
 är hemma från ██████████ och gift med en farmare. Hon har
 tidigare jobberfarenhet från skogsvårdsföreningar och Hankkija
 (lantbrukshandel). På sidan om jobbet hjälper hon till på farmen,
 motionerar tillsammans med hunden i skogen och spenderar gärna

In a brochure by Luova there is an introduction to the assessors:²⁴

One assessor is listed as “married to a farmer” and is said to “help out at the farm on the side of her job”. She is listed as deputy board member of a fur farm.²⁵

A second assessor is introduced through her ties to the industry: “[Her] connection with the industry is that she is a relative of fur farmers”.

A third assessor is introduced through the fact that she “knows most farmers from before” and that “she has worked in the industry for many years”. And a fourth assessor is said to have previously owned a fur farm.

CEO of Fur Europe, Mette Lykke Nielsen (December 2019):

The independence of the programme has been critical to us from the beginning because as a producer, you cannot reliably assess yourself. I think independent assessments are particularly important when it concerns animals since all animal debates quickly become very heated and emotional.²⁶

“

CONCLUSION

The connections stated above show that several of the WelFur assessors appear to be directly or indirectly linked to the fur industry. The brochure published by Luova introducing the auditors seems to in fact boast about the close ties to the industry.

Although Fur Europe states that audits are carried out by an independent third party assessor, in Finland a number of assessors as well as the company hiring them are connected to the industry they are monitoring.

At the time of writing there is no overall publicly available information about the use of sub-contractors or their training, nor a way of finding out which farms have achieved or failed full certification status. Thus, there is no way to independently monitor what kind of farms are eligible for the certificate, or a way to compare a farm that has failed with a farm that has succeeded in achieving certification. The farms get notified in advance about the inspections and it seems that the auditors are not all strictly independent of the fur industry.



Fox laying on wire cage floor, Finland, 2019. Oikeutte Elaimille



CHAPTER

5

**FUR FARMING
VIOLATES
BASIC ANIMAL
WELFARE
STANDARDS**

By Professor Alastair MacMillan

The Fur Free Alliance asked Professor Alastair MacMillan to review footage taken in 2019 at a number of fur farms in Finland.

MacMillan is a British veterinary surgeon whose 40 year career has spanned working for government, corporate organisations, academia and in private practice. In government service he was responsible for commissioning research on animal welfare and providing advice to Ministers. MacMillan has worked extensively internationally in a representative and personal capacity and has provided advice to a number of international organisations including the World Organisation for Animal Health (OIE), the Food and Agriculture Organization of the United Nations (FAO), European Commission and the European Food Safety Authority. Professor MacMillan is a veterinary advisor to Humane Society International.

Numerous studies show that foxes and mink are highly motivated to carry out key behaviours in their everyday lives, yet these behaviours are completely denied to them when they are confined in cages. The physical and psychological suffering documented in investigations of fur farms, including supposedly ‘high welfare’ certified fur farms, clearly shows that the barren cage-based farming systems deployed on fur farms violate the most basic animal welfare needs and are incompatible with EU law.

The circumstances in which these animals are kept provide no opportunity to satisfy even their most basic daily needs such as digging, hunting for food, roaming large distances and, in the case of mink, swimming and diving for food. Such unnatural confinement can only result in frustration and crippling mental distress, expressed in stereotypical behaviour where the animals show their distress and boredom by pacing or circling around their cage, over and over again. The provision of a wire shelf or an object to gnaw on, as a form of enrichment, is simply not sufficient to address what is a serious welfare

problem brought about through continued confinement in an unnaturally small, cramped, wire cage.

FILMED EVIDENCE OF VIOLATIONS

During the summer and autumn of 2019, footage was recorded on several fox and mink fur farms in Finland. According to Saga furs, in the autumn of 2018, 96% of the mink, 99% of the fox production in Finland was certified, in conjunction with Welfur, as part of ‘a unique farm management system producing the highest level of animal welfare’.

The investigations found extremely stark living conditions for mink on fur farms, where the energy of these animals was confined to tiny cages with wire mesh floors.

Mink, normally solitary, were typically housed together in the cages, leading to fighting, injuries, death and cannibalism. The investigations also revealed animals who had died and been left on the cage floor decomposing. These instances were far from uncommon.

There is clear evidence from the footage that basic animal welfare standards are violated by current fur farming practices. By implication therefore, the conditions are highly likely to contravene the European Directive 98/58/EC Concerning the Protection of Animals Kept for Farming Purposes, as well as the Council of Europe's 1999 Recommendations Concerning Fur Animals. In particular:

Conditions

- i. inadequate size of, and enrichment in, cages;
- ii. lack of non-wire substrate
- iii. lack of provision of water for swimming and lack of opportunity for animals to withdraw meaningfully from the presence of other animals (mink).

Management

- i. failure to isolate and provide veterinary care to sick animals
- ii. failure to provide a suitable water supply

Animals such as foxes, mink and raccoon dogs will continue to suffer from numerous conditions including cannibalism, self-mutilation, fighting with cage mates and undertaking stereotypical actions, for as long as they are kept in small, barren wire-floored cages. Welfur does not change those housing conditions – or the resulting inherent welfare issues - for these animals.

CONCLUSION

The most basic animal welfare standards are not being met for fur animals, and indeed could never be met for these species based on the model of confinement in small wire battery cages. As such, intensive fur farming could never be made, or described as, humane or ethical.

Grossly obese foxes are reported to weight in excess of 20kg - over six times the species' natural size. Selective breeding, in combination with animals being fed a diet in excess of their species' natural nutritional needs, represents a failure to comply with the Directive.



EU Directive 98/58 Annex clause 14

“Animals must be fed a wholesome diet which is appropriate to their age and species and which is fed to them in sufficient quantity to maintain them in good health and satisfy their nutritional needs.”



In contrast, the picture of this Arctic fox in the wild demonstrates the natural weight of the species, at approximately 3kg.

Several animals were observed with severe bite wounds highly likely to have been inflicted more than 24 hours previously such as in this photograph.



EU Directive 98/58 Annex clauses 2 and 4

“All animals kept in husbandry systems in which their welfare depends on frequent human attention shall be inspected at least once a day....Any animal which appears to be ill or injured must be cared for appropriately without delay....Where necessary sick or injured animals shall be isolated in suitable accommodation with, where appropriate, dry comfortable bedding.”



The lack of treatment provided, and the failure to isolate these animals from cage mates is in clear contravention of the Directive.

The Directive requires the provision of a suitable water supply constructed to minimise contamination.



EU Directive 98/58 Annex clauses 16 and 17

“All animals must have access to a suitable water supply... Feeding and watering equipment must be designed, constructed and placed so that contamination of food and water and the harmful effects of competition between the animals are minimised.”



This picture shows a water trough grossly contaminated to such an extent that no actual water remains.

EU Directive 98/58 Annex Clause 7

“Where an animal is continuously or regularly tethered or confined, it must be given the space appropriate to its physiological and ethological needs in accordance with established experience and scientific knowledge.”



In the wild, foxes can have a home range of 20-30km². In contrast, foxes on fur farms live in barren battery cages of a typical size of 0.8-1.2m² which cannot meet these animals' physiological or behavioural needs often leading to stereotypical behaviours indicative of extreme stress and boredom.



Farm runoff, Sweden, 2013. Joanne McArthur/Djurattsalliansen

CHAPTER

6

CONCLUSION



Twenty years ago, the European Union, the Council of Europe, and the European Commission's Scientific Committee on Animal Health and Animal Welfare each passed a key law or recommendation concerning the welfare of animals on fur farms.

European Directive 98/58/EC lays down general and basic rules for the protection of animals kept for farming purposes, including fur-bearing animals; the 1999 Council of Europe Recommendations Concerning Fur Animals examined welfare problems specific to species kept on fur farms; and the 2001 Scientific Committee on Animal Health and Animal Welfare's (SCAHAW) report on the welfare of animals kept for fur production produced 33 recommendations to address the catalogue of welfare problems the Committee identified in European fur farms at that time.

At that time, the Council of Europe recognised the inherent problems associated with the intensive cage-based farming system and called for research to develop housing systems to better address the physiological and ethological needs of these animals, including the provision of substrate for digging and, for mink, access to water. The SCAHAW report stated

Current husbandry systems cause serious problems for all species of animals reared for fur.



In the two decades

since these in-depth studies and recommendations were framed, animal welfare science has evolved significantly, in particular in terms of our understanding of the animals' behavioural needs and the promotion of the concept of positive welfare states. During this same period, the fur industry has had plenty of opportunity to take stock of the findings, make provisions to ensure the species-specific needs of the animals it profits from are truly met, and to actively implement the Directive and Recommendations on the thousands of fur farms across Europe. Instead, it has effectively chosen to maintain the status quo, to ignore the unambiguous evidence that an intensive battery cage system cannot appropriately provide for the specific needs of the species kept for fur production. It has chosen to build a certification scheme that aspires, at best, to meet twenty-year old minimum standards, and that endorses and rewards the 'least worst' animal welfare that can be achieved in an inherently inhumane farm setting.

Over the last twenty years, as with the decades that preceded them, clear evidence has been gathered, through numerous investigations undertaken in various European countries, showing that that even the most basic animal welfare standards are

violated by current fur farming practices, including on farms certified as having 'the highest standards of animal welfare'. Expert veterinary opinion concludes that the conditions on Europe's remaining fur farms are highly likely to contravene the European Directive 98/58/EC Concerning the Protection of Animals Kept for Farming Purposes, as well as the Council of Europe's 1999 Recommendations Concerning Fur Animals.

Since 2000 more than a dozen European countries have assessed the welfare of animals on fur farms within their own borders and reached the conclusion that it is not feasible to justify the keeping of animals such as foxes and mink in intensive caged-based systems on fur factory farms, and have legislated to prohibit the practice completely. Where countries have introduced stricter welfare legislation on fur farms, for example in Germany where a recently introduced law requires the provision of digging substrate for foxes and swimming water for mink (species-specific measures covered in the 1999 Council of Europe Recommendations), rather than implement the changes, the remaining fur farms have closed down.

Science, corporate and public opinion is increasingly critical of the use of intensive battery cage systems for domesticated animals. In 2019, more than 1.5 million citizens supported a European Citizens Initiative calling on the European Commission to "End the Cage Age". Against this backdrop, defence for an industry that unapologetically continues to incarcerate wide-roaming predators in small barren wire cages looks wholly outdated, arguably exacerbated by the wholly superfluous nature of the end product.

Twenty years on, with clear evidence that animals continue to suffer on fur farms in Europe, and that the fur industry's attempts at welfare certification withstand no scientific scrutiny, nor demonstrate meaningful independent verification:

It is clear that European policymakers need to act urgently to protect the millions of foxes, mink and raccoon dogs currently suffering and dying for Europe's fur trade each year.



Fox on battery cage farm, Finland, 2019. Oikeutta Elämille

RECOMMENDATIONS

Current European fur farming practices are incompatible with basic animal welfare standards and EU law. Welfur, which is designed around the intensive cage-based system and the current minimum level of legislation, does not offer satisfactory solutions to the serious and inherent animal welfare problems associated with fur farming.

THEREFORE WE CALL ON:

- European Union Member States, which still allow the farming of animals for their fur, to introduce legislation outlawing fur production at the earliest opportunity.
- The European Commission to act urgently to conduct audits to investigate the ample evidence of non-compliance with Directive 98/58/EC, taking into account the 1999 Council of Europe Recommendations, in all Member States where fur farming still occurs.
- EU and Member State policymakers to refrain from endorsing Welfur, or in any way integrating it into animal welfare policies.

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Fox confined in wire-mesh cage, Finland, 2019. Oikeutte Elaimille



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