



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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March 21, 2024

The Honorable Robert E. Craven, Sr.
Chairman
House Committee on Judiciary
82 Smith Street
Providence, Rhode Island 02903

RE: H 7454 An Act Relating to Commercial Law – General Regulatory Provisions – Trade in Animal Fur Products Act

Dear Chairman Craven,

Thank you for providing the Department of Environmental Management (DEM) the opportunity to comment on H 7454, which would prohibit the sale, distribution, or trade of fur products. DEM has concerns with this legislation.

While DEM appreciates the intent of this legislation, which is to improve animal welfare and combat fur farms, we have concerns about potential unintended consequences if it were enacted. Specifically, we are concerned how it would apply to Rhode Island's hunters, trappers, and livestock farmers. Pelts and tanned hides are valuable byproducts of animals legally taken by licensed hunters as well as livestock slaughtered for their meat. Further, wild furbearers are often taken through trapping, which is a highly regulated practice based on science and helps to control the population of these animals.

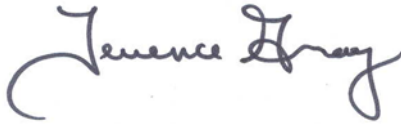
Although the legislation provides exemptions from the prohibition it introduces, we are concerned that these exemptions are not sufficient to address our concerns. One such exemption would allow an individual that hunted or trapped the animal providing the fur, or their immediate family members, to sell fur products. However, they would only be allowed to sell the fur products in a face-to-face transaction at a residence, craft fair, or other location used on a temporary or short-term basis. Furthermore, this legislation would have the effect of drying up the market for raw fur that these individuals (along with farmers) may sell to others who subsequently turn the fur into a fur product.

DEM also wants to note that there are no farms in Rhode Island that raise wild furbearing or domestic animals solely for fur production, nor have there been any in recent times. Based on the current statutory and regulatory structure, it would be very difficult, if not impossible, for such an entity to be able to operate in the state, and we would be opposed to any such activity. We

would welcome the opportunity to work with the Committee and bill sponsor to amend the language to clarify that the prohibition on the sale of fur products it introduces applies only to products originating from animals raised on a fur farm. DEM would also support an outright ban on the operation of any fur farm in Rhode Island.

We appreciate the opportunity to offer comments on this legislation and would be pleased to make ourselves available as needed. Please feel free to contact Ryan Mulcahey, DEM Director of Legislative Affairs, at ryan.mulcahey@dem.ri.gov should you have any additional questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in dark ink, appearing to read "Terrence Gray". The signature is fluid and cursive, with the first name "Terrence" being more prominent and the last name "Gray" following in a similar style.

Terrence Gray, P.E.
Director

CC: Members of the House Committee on Judiciary
The Honorable Patricia Serpa
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House
Lynne Urbani, House Policy Director