

3/7/25

Dear Chair Craven, First Vice Chair McEntee, Second Vice Chair Knight, and Members of the Judiciary Committee,

As a follow-up to the hearing on H 5447 – the Farmed Fur Animal Sales Ban bill, I have written at this time to provide a refute of a portion of the testimony provided by Michael Brown of the Natural Fibers Alliance regarding his statement/claim that “the fur farming industry is a heavily regulated industry”.

While he offered to provide a white paper to prove this to you, something that I would like to see, here are the facts which I have obtained regarding the state of regulation of this industry in the United States. Notably, the comments below pertain to Mike Brown’s submitted testimony last year for this bill and this year for this updated, more focused version, of the bill:

1. Last year Mike claimed that *96% of mink pelts are produced on “certified farms” in accordance with PAACO (the Professional Animal Auditor Certification Organization) - the organization that peer-reviews the major U.S. animal agriculture certification programs. “These farms undergo third-party inspections to ensure compliance with the highest animal care standards”.*

For your information, here is a link to PAACO’s website: <https://animalauditor.org/> and a link to their audits page <https://animalauditor.org/Audits>.

Notably, under the Audit List for Certified Audits there is no such audit for fur farming. It covers Dairy, Meat Plant, Swine, Turkey, Broilers, Cattle Feedlots, Others. Under ‘Others,’ there is a link to “Wildlife & Rodent (“Pest”) Control and a link to “Fur Commission USA Audit: Standard Guidelines for the Operation of Mink Farms in the United States” and when you click on that, you get an error. **Notably, all of the other categories in the audit list have links to at least something, nothing at all for the Operation of Mink Farms in the United States, as expected.**

So, just as I wrote in my comments and conveyed during my testimony during the hearing on 3/4/25, there are only guidelines for fur farming, no regulations, and these are only for mink farms and there is no accountability, no oversight. Considering that there are so many egregious events happening on factory farms, at a minimum, I question how valuable PAACO certification is for any of the animals listed.

2. This year Mike stated that “it is important to recognize that **the fur industry is one of the most highly regulated sectors, both in the U.S. and globally.** Farmed fur undergoes rigorous peer reviewed certification processes to ensure ethical practices and sustainability, providing consumers with confidence in their purchases. The vast majority of mink pelts produced in the U.S. come from farms that are members of the Fur Commission USA and participate in our Merit Award program, which involves independent veterinarians to ensure compliance with humane standards. Additionally, wild fur in North America is governed by a comprehensive system of laws, regulations, and controls designed to emphasize the sustainability and welfare of all fur-bearing species while protecting endangered species. This system, which operates at local, state, regional, and international levels, is complex and reflects the need to address multiple agencies, species, environments, and national borders.”

From a review of the Fur Commission USA website, this is what I found in regard to the Merit Award program: [Humane Care Certification | Fur Commission USA](#).

### **Humane Care Certification Program**

#### **What is the FCUSA Humane Care Certification Program?**

The mink industry's Humane Care Merit Award program, launched in 1989, was one of the first formalized humane care certification programs in U.S. agriculture. To guide the program's implementation, the same year also saw the first publication of the Standard Guidelines for the Operation of Mink Farms in the United States.

In consultation with veterinarians, animal scientists, wildlife biologists and farmers, the industry has developed a set of rigorous standards for the humane production of farm-raised mink. Updated regularly, these standards promote best management practices and responsible animal stewardship. The Guidelines pay detailed attention to issues of Accommodation, Food and Water, Health, Environmental Quality, Transportation, Euthanasia and Bio-Security.

Only after an independent licensed auditor completes a comprehensive compliance-inspection does a farm receive the Humane Care Merit Award. Nearly 95% of U.S. mink production comes from certified farms.

#### **Standard Guidelines for the Operation of Mink Farms in the United States**

In 1985, the Fur Farm Animal Welfare Coalition published the nation's first set of operating Guidelines for the benefit of domestic mink and fox producers in the United States. These Guidelines were designed to assist farmers in assuring a humane environment for the animals under their care. They were prepared by leaders in the U.S. fur farming industry, including professionals in the fields of veterinary medicine and animal nutrition, and the farmers themselves. The Humane Care Merit Award Program has won wide acceptance in the U.S. fur farm industry. By 1990, more than 95% of American mink production came from farms which met these standards and passed inspection by an independent veterinarian.

This extraordinary level of voluntary participation reflects the conscientious commitment of American fur farmers to the highest standards of humane animal care. In 1994, fur farming leaders undertook a comprehensive update and revision of the industry's humane care Guidelines, creating separate Guidelines for mink and fox. The results of that process are presented in the following three booklets which focus on mink and is published by the Animal Welfare Committee of Fur Commission USA. Fox farming Guidelines are published by the U.S. Fox Shippers' Council. Since 1994, the mink Guidelines have been reviewed and modified numerous times and it is a document that is continuously under review, reflecting changes in animal science.

The 2019 Standard Guidelines have been written to reflect the most recent scientific thought on animal care and welfare, and have been scientifically peer reviewed by a nationally renowned animal auditing organization. These new standards are being implemented throughout the country and reflect the highest animal welfare and humane care protocols in the world.

The Standard Guidelines for the Operation of Mink Farms in the United States consist of four "Books"; Humane Care Standards, the Farm Audit Instrument; the Biosecurity Protocols for Mink Farms in the U.S., and Forms, Records and Protocols. The purpose of which is to receive the FurMark® label.

I have included the one covering Humane Care Standards (STANDARD GUIDELINES FOR THE OPERATION OF MINK FARMS IN THE UNITED STATES).

As one can see, the minimum recommended sizes of the pens are quite small.

Additionally, while they have a couple of videos of fur farming operations on their website, these are new facilities. It is not known as to whether these are representative throughout the industry or if only the best ones are featured.

In regard to Regulations, here is the link to the page covering that topic on their website:

[Regulations | Fur Commission USA](#)

Here it is stated: *“In common with all livestock, domesticated furbearers such as mink and fox come under the jurisdiction of state departments of agriculture, not the federal government. Since there are human health concerns, the federal government does oversee in the regulation of the slaughter of food animals, e.g. the Animal Welfare Act.”*

**Notably, since these animals are not food animals, not even their slaughter is covered by the Animal Welfare Act.**

### **Regulation of fur farms remains extremely lacking.**

From an extensive review of fur farming in the United States by Born Free USA, it was found that no states reported having comprehensive laws specific to the regulation of fur farms and no states monitor the care and treatment of animals housed or killed on fur farms. **As a result, fur farms are virtually unregulated in every state where fur farming exists.**

**Once again:**

- There are no Federal Regulations in the U.S. governing how animals on fur farms are to be raised, housed, or killed.
  - Animals raised for fur are not covered under the federal Animal Welfare Act.
  - The slaughter of fur bearing animals is also not covered by the federal Humane Slaughter Act.
  - Most states where fur farms exist don't require farms to be licensed and state agriculture departments may not even be aware of the location, status, or existence of fur farms.
  - Even in those few states that require fur farms to be licensed, there are no inspections, so it is meaningless.
  - There is certainly no regulation of fur farms in RI.
  - Additionally, U.S. federal laws such as the Endangered Species Act, the Lacey Act, and the Fur Seal Act, protect animals in the wild but do not include animals on fur farms.
3. Last year Mike also urged that *“alternative approaches that prioritize education, responsible farming practices, and animal welfare” be considered and that “Such alternatives have already been established, such as FURMARK which is a global certification and traceability system that guarantees animal welfare and environmental standards are met across the entire natural fur supply chain.”*

For your information, here is a link to the FURMARK Sustainable Natural Fur “What Is FURMARK” page of their website: [What is Furmark | Furmark Individual Certification Programme](#)

Here also is a link to the FURMARK Sustainable Natural Fur “How It Works” page of their website: [FURMARK Overview](#).

Here is a link to their ‘Cerification” page: [Fur Farms | WelFur Farm Certification in Europe](#). The drop-down menu lists the following:

- a. WelFur
- b. US Farm-Raised Fur
- c. Certifur Canada
- d. North American Wild Fur
- e. Swakara
- f. Sable
- g. Dressers & Dyers

- **Regarding US Farm-Raised Fur**, here is the section of their website covering “certification” of **US Farm-Raised Fur**: [US Farm-Raised Fur](#)

Here it is stated that “The USA has been certifying its farms with veterinarians since 1988 and is currently updating its standards in response to scientific advances and innovation”.

The only listing is for MINK where it is stated that “The American farm-raised mink sector has a long history of prioritizing welfares programs and associated certification assessments, aiming to support quality welfare practices and meet supply chain requirements. The standard guidelines for US mink farms cover a range of topics: management of the farm, accommodation, food and water, health, environmental quality, transportation, humane euthanasia, biosecurity, and animal husbandry.”

The USA’s standard guidelines are verified by Validus (an independent animal auditor organisation). ”

On this page is the following: **US Farm-Raised Fur Protocol** and below that is this: “Download the US Farm-Raised Fur Protocol from this link”. **However, that supposed link is not active.**

Continuing on with an exploration into Validus, I found that Validus appears to be a legitimate organization for animal care audits. <https://www.validuservices.com/animal-care-audits>

Their contact info is here: <https://www.validuservices.com/contact>

According to their website, under animal welfare audits (<https://www.validuservices.com/animal-care-audits>), they only have Animal Welfare Review programs for the dairy, swine, egg, beef, and poultry industries. **Nothing for fur farms.**

- **Regarding North American Wild Fur**, here is the section of their website covering “certification” of North American Wild Fur: [North American Wild Fur](#)

Here it is stated that The Wild Fur Certification Protocol helps to ensure that population and environmental sustainability is key to how wild fur is harvested. It complements the system of checks and balances that operate at local, state, regional, and provincial levels and far-reaching international agreements.

Below the above is a section covering “The Agreement on International Humane Trapping Standards (AIHTS)”. **There is nothing mentioned in this section about fur farming.**

Below the above is a statement regarding “Wild Fur – Third-Party Protocol and Audit”. Here it is stated that “The IFF has worked with a leading international verification and assessment company to develop a Protocol for wild fur, to be used to audit and verify the process from trapping to the auction in regards to animal welfare, sustainability and traceability.”

**There is nothing mentioned in this section about fur farming.**

- **Regarding Cerifur Canada**, here is the section of their website covering “certification” of that: [Certifur Canada](#).

Here it is stated that “Certifur Canada provides assurances to buyers and consumers that animal care standards are being met.”

The listing for MINK states that “Certifur Canada has a long history of prioritizing welfare programs and associated certification assessments, aiming to support quality welfare practices and meet supply chain requirements.

The standard guidelines for Canadian mink farms cover a range of topics: management of the farm, accommodation, food and water, health, environmental quality, transportation, humane euthanasia, biosecurity, and animal husbandry.

Third-party verification for the Canadian mink sector is being conducted by an internationally recognized, professional auditing company, MSVS Canada Inc.”

The listing for FOX states that “The Canadian code of practice for the care and handling of farm-raised fox contains seven sections detailing the responsibilities of the producer: accommodation and housing, biosecurity, food and water, health and welfare management, animal husbandry, humane euthanasia, and transportation.

Third party verification of the Canadian fox sector is being conducted by an internationally recognised professional auditing company, MSVS Canada Inc.”

Below this is the following: **Certifur Canada Protocol** and below that is this: “Download the Certifur Canada Protocol from this link”. **However, that supposed link is not active.**

Continuing on with an exploration into MSVS Canada Inc., I found this: [HOME | MSVS Canada Inc. | Industry Leading Certifications](#).

On their “Certifications” page ([CERTIFICATION | MSVS Canada Inc. | Industry Leading Certifications](#)) is this:

1. CANADA GAP: Food safety certification for operations involved in the production, packing, storage, repacking, wholesale and brokerage of fresh fruits and vegetables.
2. SUSTAINABILITY STANDARD: A robust certification for producers, processors and promoters of sustainable agriculture.

**There is nothing on their website in regard to fur farming, just farming and farmers.**

- **Regarding Swakara**, here is the section of their website covering “certification” of that: [Swakara Certification | Animal Welfare Certification Programme](#)

Here it is stated that Swakara is the name of a specific breed of Karakul (high-quality lambskin) from Namibia: the species-specific animal welfare certification programme is an integral part of the Furmark® certification system.

These are not caged animals, so it is not very relevant to this discussion.

- **Regarding Sable**, here is the section of their website covering “certification” of that: [Sable Fur, Sable Animal, Russian Sable, Fur for Sale UK – Furmark](#)

Here it is stated that Sable fur has been a highly valued item in the fur trade since the Early Middle Ages and is in demand among a range of high fashion brands worldwide and there is a species-specific certification programme in place.

These are not caged animals, so it is not very relevant to this discussion

- **Regarding Dressers & Dyers**, here is the section of their website covering “certification” of that: [Dressers and Dyers](#)

Here it is stated that Furmark®-certified dressers and dyers satisfy three important criteria: the highest standards of product safety; government inspection of facilities to ensure minimal emissions; and declarations from the companies themselves making them culpable for any failure to uphold their commitments.

This is in regard to Certification for environmental emissions, so it is not relevant to this discussion.

- **Regarding WelFur**, here is the section of their website covering “certification” of that: [Fur Farms | WelFur Farm Certification in Europe](#)

Here it is stated that “WelFur is the fur farm inspection and certification programme covering mink, fox, and Finnraccoon in Europe. Assessments are performed by third party assessors and farms that fail to meet the strict standards are not included in the certification programme.”

Notably, this is quite extensive and covers the following:

1. WelFur is the basis of the objective on-farm animal welfare certification of approximately 3,500 European fur farms. It is closely aligned with the subsequent dressing and dyeing process. Dressing and dyeing will itself be subject to independent verification and inspection. This will ensure a thorough certification that tracks fur skins through the supply chain.
2. In Europe, the WelFur program will eventually cover all of the fur producing farms. The implementation of WelFur started with a test assessment in 2015-2016 across 10 different European countries. In the implementation stage between 2017 and 2019, 3200 farms have been certified. Since December 2019, all major auctions have been collecting skins in Europe only from Welfur certified farms.

3. WelFur has been created by independent scientists from seven European universities and is aligned with ISEAL's Credibility Principles: truthfulness, transparency, sustainability, relevance, accessibility, efficiency, engagement, impartiality, improvement, and rigor.
4. Welfur is available for all European farmed fur from mink, fox, and Finracoon. The scoring system and the rigor of the process provide an accurate picture of whether a farm meets a required industry standard. There are 25 measurements to assess the welfare of foxes and 22 measurements for mink. The measurements are either resource-based, management-based or animal-based. Animal-based measures are generally the best method to assess animal welfare but this is not always the case. WelFur serves as a management tool for individual farmers. If the individual farmer sees a need to improve a practice, he/she can get help through the national organization in their country designated to apply WelFur.
5. Since the initial phase of WelFur, a set of external reviewers/experts were asked to assess the program. These experts included scientists also working with the EU Commission's Welfare Quality® project, as well as fur science experts. All WelFur visits are conducted by independent third party assessors with years of experience in the field of animal welfare assessment. Currently, the fur farms are assessed, independently of the industry, by Baltic Control.
6. The certification will be transparent for policymakers, customers and the general public. All Welfur protocols are publicly available under [this link](#). The aggregated results are available upon request.
7. In order to receive a certificate, a farm has to be visited by WelFur assessors during each of the three production periods. After that, to maintain the certificate, the farm needs one maintenance visit per year. More visits can be arranged if the farmer is not certified. In order to prepare the necessary documentation, the visits will need to be announced to the farmer in advance. However, the assessment is detailed enough to ensure that any mismanagement of the farms will be noticed during these visits.
8. The aggregated results are available upon request. It is important for national authorities to possess those results should WelFur become the basis for their state legislation. Brands will also have access to the results of the assessments.
9. WelFur is a dynamic program and will be updated with any new scientific advancements. The strength of WelFur as an animal welfare assessment system is its comprehensive, methodological approach to animal welfare based on specific indicators. At present, animal welfare assessment of European fur farms is typically performed by national authorities who mainly look for compliance with legislation. However, levels of control and basic legislation differ considerably from one European country to another. WelFur assessments of fur farms will be performed every year, at different times of the year, taking the biological life cycle of fur animals into consideration.

#### **WelFur established protocols.**



## **There are protocols covering Mink, Fox, and Finracoon.**

The objective of each, as stated in the protocols, is as follows:

The objectives of WelFur - The main objective of WelFur is to check the level of animal welfare on European fur farms. This can form the basis for a solid certification programme to cover all European fur farms. Assessments will be carried out by third-parties and results will be communicated to the fur farmer in order to encourage the farmer to take the most appropriate steps to improve animal welfare. This should be seen as a 'win-win' situation. **It must be underlined that the WelFur assessment protocols evaluate the actual welfare of the fur animals and not primarily compliance with any national and/or EU legislation.** At present, national authorities carry out controls of fur farms with the objective of ensuring compliance with existing legislation on animal welfare. However, the levels of control and the basic legislation differ considerably from one member state to the other. Another potential benefit of the WelFur project is consequently to influence the reform of current controls and legislation on both national and EU levels. **The industry proposes that WelFur could serve as an EU-based scientific reference for regulation and control.**

**Notably, WelFur is an industry voluntary certification program.**

**Animal welfare NGOs do not consider WelFur as an efficient system to assess the welfare of each individual animal and presented their views in the report “Certified cruel. Why WelFur fails to stop the suffering of animals on fur farms” <sup>(17)</sup>.** They highlight in particular that WelFur is designed around the current cage-systems and does not require access to water for mink, or sides for digging for foxes, thus not addressing the natural behavioral needs of those animals.

In 2001, the European Commission Scientific Committee on Animal Health and Welfare adopted a report on 'The welfare of animals kept for fur production' <sup>(18)</sup>, dealing with the welfare of certain species used for fur production.

The report focused on the scientific assessment of the welfare of animals kept for fur production and states that the husbandry systems, used at the time of the assessment, caused serious problems for all species of animals reared for fur and encouraged corrective measures and efforts to redesign housing systems which fulfil the needs of these animals.

The report states that cages and management practices and methods used for farming mink and foxes should be greatly improved to provide sufficient environmental complexity, to stimulate normal behaviours, such as play and exploration.

**A review of the effectiveness of WelFur's certification program is covered here: [WelFur - Fur Free Alliance](#)**

In summary, it was found that:

“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 animal welfare problems associated with fur farming. Decision-makers must therefore refrain from endorsing WelFur, or in any way integrating it into animal welfare policies.”



## **Overview of Fur Farming Regulations in Europe**

A search for the regulations on fur farming in Europe affords Sustainable Fur as the main result. Here is a link to that site: [Fur Farming Europe: Regulations, Welfur and Sustainability • We Are Fur](#)

In this article it is stated that “In addition to national legislation, [a wide range of EU legislation](#) applies to fur farming, including strict regulations on killing methods, trapping, international trade and animal welfare.

However, a NOT FOUND error occurs when clicking on the above link.

Also in this article it is stated that “For more information, please visit [FUR EUROPE](#).”

However, the supposed linked info does not appear to be accessible.

**Here is a dated linked review of European Fur Farming Regulations by the Humane World for Animals:**

Fur farming in Europe is regulated by a combination of national and EU legislation<sup>1</sup>. While there is no specific EU legislation providing detailed animal welfare requirements for fur production, fur factory farms are covered by Council Directive 98/58/EC, which lays down general minimum requirements for the protection of animals kept for farming purposes<sup>2</sup>. Additionally, 22 European countries have banned fur farming, with Romania joining this group in October<sup>3</sup>

Notably, the above directive - Council Directive 98/58/EC – is the most recent directive which has a section covering fur farming and **it is dated July 20, 1998!** It lays down general rules concerning the protection of farmed animals, irrespective of the species. These apply to farmed animals destined for the production of foodstuffs, wool, skin or fur, or for other farming purposes, including fish, reptiles and amphibians.

**The most current action in regard to fur farming regulations in Europe and the welfare of animals on fur farms is covered in this document dated 12/21/23:**

[C\\_202301559EN.000101.fmx.xml](#)

This is a very thorough document which lists:

1. The Number of farms in the EU by Member State and by species
2. The National bans in EU Member States
3. The State of play <sup>(36)</sup> in Member States without a ban on fur farming

In response to this European Citizens’ Initiative (ECI) ‘Fur Free Europe’ to place a ban on fur farming throughout all of the European Union Member States:

- the Commission requested EFSA (European Food Safety Authority) to provide by March 2025 a scientific opinion in order to take an informed decision;
- based on the EFSA opinion and the outcomes of this evaluation, the Commission will, by March 2026, communicate whether it considers it appropriate to propose a prohibition, after a transition period, on the keeping in farms and killing of farmed mink, foxes, raccoon dogs or chinchilla, and whether it is appropriate to propose a prohibition, after a transition period, of the placing on the Union market of fur and fur products derived

from mink, foxes, raccoon dogs or chinchilla originating in fur farms or alternatively to adopt, through EU legislation, appropriate standards suited to better address the welfare needs of the animals.

- Pending this assessment, the Commission is taking several steps in relation to animal welfare, one health and environmental impacts of fur farming:
  - in 2024 the Commission is planning to conduct three on-site visits to Member States with mink/fur farms, exploring the controls and the One Health mechanisms in place. These visits may also include some fact-finding elements on animal welfare;
  - depending on the outcome of the ongoing assessment, the Commission will consider in 2024 whether to propose to include American mink (*Neovison vison*) in the list of invasive alien species of Union concern under the IAS Regulation;
  - the Commission shall finalise during 2024 an evaluation and impact assessment preparing the revision of the Textile Labelling Regulation to provide detailed labelling information to consumers on the presence of real fur in all apparel and related products such as clothing accessories. Based on the outcome of the evaluation and impact assessment, the Commission will consider whether a revision of the Textile Labelling Regulation is opportune.

Here is an overview report about Fur Farming in Europe: [Facts about Fur production in the EU - ESDAW](#)

**It is quite alarming!**

**In summary:**

- 1. There are no Federal regulations in the United States for fur farming and, in a practical sense, for those states in which there is licensing of fur farms, which are few in number, the impact is essentially meaningless.**
2. There are regulations for fur farming in Europe, however, they vary from one member state/country to the next and the majority have banned fur farming, and several others amongst those which have fur farms are planning to do so.
- 3. WelFur is a non-profit organization in Europe which has guidelines for fur farming and protocols for inspections for fur farms by third parties with the purpose of certification of fur farms which adhere to their guidelines and protocols as well as to encourage the farmer to take the most appropriate steps to improve animal welfare for those that do not. However, this is an industry voluntary program, and it has been found that this program does not offer satisfactory solutions to the serious animal welfare problems associated with fur farming.**
4. China - We already know that the conditions and practices on fur farms there are horrifically inhumane.

Once again, I urge you to vote in favor of H 5447 – for the banning of the sale of farmed animal fur products.

Sincerely,  
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