



## RHODE ISLAND

### DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

#### OFFICE OF THE DIRECTOR

235 Promenade Street, Room 425  
Providence, Rhode Island 02908

March 4, 2025

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

**RE: H 5447 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 5447, 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.

A provision found in the proposed enforcement section on page three of the legislation states that "there shall be a rebuttable presumption that a fur product contains fur that was sourced from an animal raised, maintained, kept, or housed for all or part of its life on a fur farm." In other words, the burden of proof would fall on an individual to prove that a fur product does not contain fur from an animal raised on a fur farm. DEM is concerned that this would have a chilling effect on the production of fur products resulting from legal farming, hunting, and trapping. Individuals engaged in these activities would fear civil penalties under the law and the potentially substantial costs associated with rebutting the presumption that the fur products they sell contain fur from an animal raised on a fur farm. We are concerned that shifting the burden to the individual to disprove that the fur product is not a prohibited item is unfair, and the burden would be more properly placed on the state to prove that the fur product is prohibited.

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](mailto: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 A. Serpa  
Nicole McCarty, Chief Legal Counsel to the Speaker of the House  
Lynne Urbani, House Policy Director