

4/29/25

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

My name is David Brunetti, and I live in Burrillville, RI. I am writing to you today about House Bill No. 5447 Substitute A – the Farmed Animal Fur Product Sales Ban Bill. I support this bill and urge you to vote in favor of it for the following reasons.

This bill would prohibit a person to sell, offer for sale, display for sale or otherwise distribute a farmed animal fur product within the state and provides graduated civil penalties for violations.

This bill does not impede upon Native Americans concerns as it relates to the trade or sale of furs.

This bill does not impede upon the concerns of fur trappers for their ability to sell or trade furs obtained via trapping.

Passage of this bill, for which the focus this year has become strictly for farmed animal fur products over the more general focus of the version introduced last year, would help to bring to an end the perpetuation of the barbaric, inhumane fur farming industry, which is unnecessary and for which there is essentially no regulation and where, at least in China, foxes and raccoon dogs are crammed into filthy cages, clubbed on the head or stunned with an electric prod, and sometimes skinned alive!

No animal should be caused to or allowed to suffer, and in many cases horrifically, for this purpose.

As stated by Professor Reverend Andrew Lindzey, **“All the ways we exploit animals are terrible, but none of them is more terrible than the living hell we create for animals on fur farms”**.

Contrary to the claims by some, **there are no federal regulations in the U.S. governing how animals on fur farms are to be 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.
- 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.

- 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 government inspections, so it is meaningless.
- **There is certainly no existing regulation for fur farms in RI.**

Fur Commission USA

It is likely that at the hearing for this bill and/or in written testimony for it, someone will make the comment/claim that this industry is one of the most highly regulated industries. Well, that couldn't be further from the truth. They will likely try to support their position by speaking about the Fur Commission USA in this regard.

The Fur Commission USA is the national level non-profit group representing the U.S. mink farming industry and it has guidelines for fur farming, not regulations, and these guidelines are extremely lacking in terms of minimize size guidelines for total living space.

Notably, I had email communication with the President of the Fur Commission USA (*refer to the attachment for this submission*).

Although I asked for him to provide even a single document which proved that there was any regulation of fur farming in the United States, he was unable to do so.

From the Regulations page on the Fur Commission USA website is the following statement:

"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."

Notably, 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.**

Here is a detailed summary of the findings from the investigation by Born Free USA for fur farming in the United States:

- (i) Current standard industry practices focus on maximizing profit, fur farmer convenience, and minimizing costs. Animal welfare considerations that do not result in substantial profit margin increases or hedge against profit loss are ignored. Exceptions to this rule are found only in countries that have passed legislation that

specifically requires fur farms to comply with certain animal welfare provisions or that prohibits particularly egregious practices.

- (ii) In North America, including the United States, such laws are sorely lacking; fur farmers are virtually unfettered by government oversight.
- (iii) Presently, there are no federal regulations governing how animals on fur farms are to be housed or killed and the slaughter of furbearing animals is not covered by the federal Humane Slaughter Act.
- (iv) Slaughter of fur-farmed animals typically occurs on the respective farm and neither the equipment nor the methods used are regulated by any federal agency or by any state agencies where fur farming exists.
- (v) In the United States, federal agencies, state agriculture agencies, and state wildlife agencies engage in proverbial buck-passing and finger-pointing over which has responsibility and authority to regulate this industry.
- (vi) From a survey of state agencies in fur farming states conducted 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 and killed on fur farms. As a result, fur farms are virtually unregulated in every state where fur farming exists.
- (vii) No fur farming states have established care, housing, or veterinary requirements for animals housed on fur farms. No states with active fur farms require such farms to keep records of any type.
- (viii) While fur farming may fall under general environmental protection laws at the state or even federal level, without licensing or inspection, disease outbreaks and pollution may go unreported, unnoticed, or detected only after significant damage has occurred. Indeed, with regard to fur farms, state and federal agencies appear to have a “don’t ask, don’t tell” and a “don’t look, don’t find” policy.
- (ix) With regard to anti-cruelty laws, in most fur farming states such laws either don’t apply or are typically not enforced on farms. In a majority of states where fur farming exists, the anti-cruelty laws contain provisions that exempt “common,” “customary,” or “accepted” farming practices, thereby placing fur farmers beyond the reach of the law. Moreover, the apparent lack of inspection by state agencies means there is little or no opportunity for treatment that falls outside “common” or “customary” practices to be reported and, as such, no opportunity for enforcement action.

- (x) While the USDA National Agricultural Statistics Service (NASS) collects data on the number of mink farms, it does not collect data on farmed fox, lynx, or bobcat fur production.
- (xi) Most states where fur farms exist don't require farms to be licensed and state agricultural departments may not even be aware of the location, status, or existence of some farms.
- (xii) Accommodations: The current industry practice for housing of furbearing animals is highly inadequate with respect to basic care such as sanitation, provision of adequate and potable food and water, treatment of sick and injured animals, and euthanization.
- (xiii) Enclosures: Important considerations such as cage size and composition merely adopt standard industry cage sizing and in no way reflect the needs of the furbearing animals.
- (xiv) Carcass disposal on/from fur farms is an important issue which needs to be regulated. "Currently it appears that the majority of fur farms are burying their carcasses in landfills. This process, easy as it may be, has a number of negative consequences "(van der Marel et al. 2008). One of which is that if barbiturates were used to euthanize the animal – which is a humane practice that is highly recommended by the AVMA guidelines – then, due to the persistence of this substance in the carcass of the animal, "it may cause sedation or even death of the respective animal(s) when the carcass is scavenged by native wildlife, including birds of prey.
- (xv) Manure disposal from fur farms is an important issue which needs to be regulated. The current factory-farm type manner in which these animals are housed produces the same issue with waste as that of other factory farming operations - loads of waste (manure) that is too intensely concentrated to be neutralized by natural processes and, therefore, such manure must be composted in order to reduce odors and pathogens.

Notably is the fact that several years ago I worked with a D.C. staff member for over a year at former Representative Langevin's office to try to come up with a federal bill to regulate fur farming. We had interaction with the Fur Commission USA and the best that we could get before a change in the federal Administration (to President Trump's first term) was that the Fur Commission USA would be coming up with new guidelines. **So, no regulation came out of that effort and as of today there remains no federal regulation governing this industry.**

Where has the sale of fur products been banned?

Notably, on January 1, 2023, California's ban on the sale and manufacturing of new animal fur products officially went into effect.

Cities in California, Massachusetts, Michigan, and Florida have banned the sale of fur products.

Hundreds of companies and fashion brands have banned fur.

Many well-known fashion brands and designers have stopped using real fur completely. Some of them are Versace, Furla, Armani, Calvin Klein, Gucci, Michael Kors, Neiman Marcus, Ralph Lauren, Tommy Hilfiger, Shrimps, and Vivienne Westwood.

Nationally:

In 2021, Israel became the first country to prohibit the sale of fur.

Additionally, Austria, Croatia, the Czech Republic, Slovenia, Bosnia and Herzegovina, Luxembourg, Serbia, Italy, France, North Macedonia, the Netherlands, the UK, and more recently, Lithuania, Latvia, Malta, and Ireland have legally prohibited fur farming, and the breeding practice has already been terminated.

Based on all the above, and much more, I urge you to vote in favor of H 5447 Substitute A to ban farmed animal fur sales in RI.

Thank you for your time and for this opportunity to provide you with my comments.

Sincerely,

David A. Brunetti
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