



**HUMANE SOCIETY
INTERNATIONAL**
UNITED KINGDOM

FURMASK


**10 Reasons why Furmark will not
Protect Consumers or Animals**





Certification schemes exist to provide confidence in goods or services, showing that they consistently meet a well-defined standard or set of criteria that has value to the end user. Since the 1980s the fur trade has suffered sustained erosion of public acceptance, fuelled by exposés of the suffering experienced by animals on fur farms, and caught in traps. In response to this, the industry has created numerous ‘welfare assurance’ or certification schemes over the years, including Origin Assured, Saga Certification, and Welfur. Animal welfare organisations including Humane Society International, backed by animal welfare scientists and veterinarians, have found major failings in all such schemes.

Now, apparently focused on creating a public relations initiative aiming to boost retailer and consumer confidence, and reverse the industry’s major economic downturn, the International Fur Federation has consolidated a disparate set of inadequate certification schemes under one global marketing banner – Furmark.



Furmark describes itself as ‘a comprehensive global certification and traceability system for natural fur that guarantees animal welfare and environmental standards.’

Here, we present ten key ways in which we believe Furmark will fail both consumers and animals

Furmark certification allows:

- 1 Cruel caging** – animals such as foxes and mink kept in wire mesh cages measuring only around one square metre for their entire lives.
- 2 Unscientific welfare measures** – that have the effect of concealing poor health and welfare, and have been heavily criticised by animal welfare experts and veterinarians.
- 3 High tolerance for injury and illness** – for example up to 15% of animals on a farm can have severely deformed (bent) feet, and/or diarrhoea before serious action is required.
- 4 Cruel trapping methods** – including leg hold traps in which animals can be left suffering for days and drowning traps.
- 5 Inhumane killing methods** – including anal electrocution, gassing, suffocation and drowning.
- 6 Standards that fail to meet public expectations** – many of the permitted ‘animal welfare standards’ are considered ‘unacceptable’ by 90%+ of British public.
- 7 Inspections and assessments paid for by the fur trade** – and where inspections are pre-announced and infrequent.
- 8 No consistency and a race to the bottom** – using public relations spin, the fur trade has attempted to blend a disparate range of existing schemes, and cynically aims to recalibrate consumer’s views of cruel activities as ‘good’ and ‘responsible’.
- 9 Coverage of only around half of global fur production** – the millions of animals farmed for their fur in China each year (forty million animals in 2019) are not covered by the scheme.
- 10 Misleading claims and false credibility** – Furmark’s Welfur scheme implies endorsement from the European Commission, where there is none, and is underpinned by research that has been funded and coordinated by the fur trade itself.



1 Furmark certification permits cruel caging:

All the farm-based schemes under Furmark are based on the model of confining wild species in a small (typically 1m² or less) wire cage for their entire lives (typically around 8 months but considerably longer for breeding animals). It is fundamentally impossible to meet fur-farmed species' physiological and behavioural welfare needs in these circumstances. Countless investigations show the physical and mental toll, with animals suffering horrific open wounds and injuries like missing eyes, ears and tails, and driven to self-harm and cannibalism. Stereotypic behaviour like repetitive pacing and head bobbing are not uncommon, and are clear signs of mental distress.

The Furmark farm certification schemes fail to meet the "Five Freedoms", the internationally recognised framework for basic farm animal welfare, which includes the freedom 'to express normal behaviours'. For example, mink are semi-aquatic animals and need to swim and dive

to express normal behaviour, they are also naturally solitary and roam territories of several kilometres per day. But on 'certified' fur farms they have no access to water for these activities at all and spend every day in a wire cage about the size of a suitcase, unable to run or swim or hunt. Foxes are typically kept in wire mesh cages that are thousands of times smaller than their territories would be in the wild, and that deny them the ability to practice their key natural behaviour of digging. The wire mesh floors of the cages are uncomfortable under foot, and especially challenging for kits and pups, whose legs fall through the holes.

Despite the public relations spin of Furmark schemes such as Saga Certification that wire cages provide 'Safe and stimulating housing', numerous scientific studies and authors have contested the notion that battery cages can ever be considered acceptable environments in which to keep wild carnivore species such as mink and fox. In a letter dated February 2020, the Federation of Veterinarians of Europe stated "It is clear that for certain species, especially for undomesticated animals like foxes, it is not possible to create housing conditions on commercial farms that meet the needs of the animals. Such animals should not be farmed." ¹

2 Furmark schemes use unscientific measures to create false positives for animal welfare:

Modern welfare science seeks to measure animal welfare in meaningful, absolute terms, and is concerned with the welfare of individual animals. Measuring the true welfare status of animals kept in battery cages will only yield unfavourable results, so Furmark schemes, such as Welfur, use crude measurements and impenetrable equations to mask poor welfare situations and present the overall picture as acceptable. For example, to assess if a fox is in a 'positive emotional state' the Welfur criteria requires the insertion of a plastic stick into the cage. If the fox touches or investigates the stick, a positive score is awarded for its overall emotional state, despite the fact that this is clearly an extraordinarily over-simplistic measure to ascribe any inference of emotional wellbeing in a behaviourally complex animal.

The Welfur scoring system also exaggerates the welfare benefits of very minimal and optional enrichments, which misleadingly boosts a farm's overall score. For example if an otherwise empty cage has a single piece of rope, it is awarded a 'very beneficial' score² even though it makes very little difference to the animal's well-being, relative to a large set of key behavioural needs that are entirely unmet. Two of Furmark's most established and prominent farm

welfare certification schemes (Saga and Welfur) have received substantial criticism from welfare and veterinary experts, including by national veterinary authorities. In 2014 Saga Certification, which covers 100% of raccoon dog fur farms and virtually all fox and mink fur farms in Finland, was criticised by the Finnish Veterinary Association, which stated that fur marketing should not give the misleading impression that certification would guarantee the welfare of the animals.³

The criteria used in the Welfur scheme have been criticised by numerous welfare and veterinary experts. In 2018 the Veterinary Ireland National Council concluded that "the Welfur programme cannot prevent the welfare problems regularly encountered on fur farms," and further that "given the nature of the animals concerned and the environment in which they are held, there are simply no welfare standards or inspection regime that would prevent such problems arising on a regular basis."⁴

The most recent analysis of the deficiencies of Welfur was a 2020 review by veterinarian and Professor emeritus at the Department of Animal Environment and Health, Swedish University of Agricultural Sciences Bo Algers, who concluded:

"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... It should be noted that a Welfur assessment does not guarantee that individual animals do not suffer from poor welfare."⁵



3 Furmark schemes allow unacceptably high incidence and severity of injuries and illness:

Under Furmark schemes such as Welfur in Europe, animals can still suffer a whole range of welfare problems and still get accreditation – this includes major unhealed injury (e.g. missing more than half the tail or bone exposed), major healed lesions (e.g. missing more than half the tail), stereotypic repetitive behaviour (e.g. repetitive pacing and head bobbing)⁶, severely bent feet (in foxes), eye discharge/inflammation, fear and aggression towards humans. The Welfur scheme operates an “alarm” threshold, a percentage of animals on a farm suffering from a particular condition, above which a farm ‘health plan’ is required. For foxes, Welfur accepts 0.5% of “obviously sick” animals, up to 15% for animals suffering from “severely bent feet” (caused by standing on wire floors), 7.5% of animals suffering “ocular [eye] inflammation”, and 15% of animals may be suffering from diarrhoea.⁷

The Welfur evaluation scheme combines numerous inadequate different welfare measurements into an overall score for a farm. This practice obscures individual measures and therefore allows serious systemic welfare problems and severe suffering caused by persistent injuries and illness to be masked. It also makes no attempt to address the worrying underlying causes of persistent injuries caused by self-mutilation or cage-mate aggression.

4 Furmark certification schemes permit cruel trapping:

Furmark endorses the use of restraining traps for fur-bearing animals, such as coyotes and bobcats, who are caught by the legs or necks. Animals can be left in these traps for days, unable to seek shelter, food or water, or defend themselves from predators, and sometimes they even try to tear off limbs trying to escape. When the trappers finally arrive, they will either shoot them, or stamp or crush the animals to death. Traps are indiscriminate and both targeted and non-targeted animals (like pets and endangered species), are known to fall victim to these traps.

Furmark encompasses what it describes as ‘the North American Wild Fur’ certification programmes, which appears to be an attempt to make a highly disparate and inconsistent series of state, provincial, territorial and federal rules pass as a homogeneous scheme. Born Free USA’s 2011 and 2016 undercover investigations⁸ into fur trapping in the US show that laws – federal or state – do not provide adequate safeguards, and demonstrates the lack of oversight and the frequency with which the few regulations that do exist are ignored. Trapping seasons, how often traps need to be checked, what type of traps are legal to use and on what species is all largely regulated through the individual States. Born Free USA’s report states “Very few States have any regulations governing how trapped animals can be killed, meaning that trappers can resort to extraordinarily cruel and inhumane methods of killing, including crushing, strangulation and drowning, in order to keep the pelt intact.”





Due to the variability in trapping rules and practices under Furmark, and a lack of ability of the International Fur Federation to oversee or verify adherence, Furmark can say very little about the absolute standards it demands for trapped animals certified under its scheme. However, it does refer to the Agreement on International Humane Trapping Standards (AIHTS) an agreement framed by the fur industry that sets standards for traps used to capture 19 fur-bearing species, as one of the standards it uses to form its 'statement of principles' for wild caught fur.

The AIHTS takes the industry-permissive approach of setting the acceptable time to irreversible unconsciousness according to the performance of the lethal traps available, hence for all species (with the exception of pine martins, stoats, martens and sables) traps may take up to five minutes to kill the animal. Drowning traps are approved under the AIHTS for beavers. The AIHTS's approval of the padded leg-hold trap (designed to restrain an animal until a hunter returns to dispatch it) is similarly concerning, since it causes significant suffering that can last for days. The AIHTS has been criticised by veterinary and welfare experts, including the Scientific and Veterinary Committee of the European Commission, which stated that an animal suffering in a lethal trap for five minutes, and the use of drowning traps for semi-aquatic mammals (such as beavers), could not be considered 'humane'.⁹

5 Furmark accepts inhumane killing methods:

Schemes under Furmark still allow foxes and raccoon dogs to be killed by anal electrocution, and mink to be gassed to death. All of these methods cause terrible pain, fear and suffering. The use of gases such as carbon monoxide to kill mink is notably problematic and aversive given that mink are physiologically adapted to a semi-aquatic lifestyle, which means they resist the effects of the lack of oxygen and toxic gas, making death more prolonged. As mentioned in point 4, Furmark refers to the AIHTS as one of the component standards behind its 'wild fur statement of principles', and under the AIHTS drowning traps are permitted for beavers.



6 Furmark incorporates welfare standards that the vast majority of British people consider ‘unacceptable’:

Points 1-5 in this briefing summarise some of the key welfare problems inherent to fur farming and trapping, including farming and trapping taking place under the auspices of Furmark’s certification schemes. In addition to the widespread concern from vets and welfare scientists about the inadequacy of welfare provisions in fur certification schemes, polling also demonstrates that the vast majority of British people do not consider the treatments of animals permitted by Furmark to be acceptable.

A May 2021 YouGov poll¹⁰, commissioned by HSI UK, asked ‘Do you consider the following to be acceptable or unacceptable practices for animals used in the global fur trade?’. All of the practices listed in the poll are permitted under Furmark certification schemes.

The poll returned the following results:

- **Keeping foxes for their whole lives in wire cages measuring between 1 and 1.5m² –**
 - Acceptable = 2%
 - Unacceptable = 93%

- **Capturing and killing wild beavers by drowning in underwater traps –**
 - Acceptable = 2%
 - Unacceptable = 93%

- **Trapping wild animals (e.g. coyotes) in leg-hold traps –**
 - Acceptable = 3%
 - Unacceptable = 92%

- **Killing foxes by anal/vaginal electrocution –**
 - Acceptable = 2%
 - Unacceptable = 92%



7 Furmark lacks independent oversight:

Despite Furmark's claim that its schemes must include verification systems that are impartial and conducted by third parties, it is known that some fur farm verification and audit schemes under the Furmark banner are run and paid for by the fur industry.

Welfur, for example, was initiated and funded by Fur Europe, which represents European national fur breeders associations. The inspectors who evaluate animals against the Welfur scheme's criteria, are ultimately paid, in full or in part, by the fur trade. Welfur states that assessments are by an independent third party, and Danish-based Baltic Control was appointed as the independent third-party assessment company to manage the audits of Welfur farms in different countries. However, it appears that it is not directly carrying out the audits in all of the European countries, but is using sub-contractors instead, as stated on Luova's website: "Starting from the spring of 2017, Luova also acts as a subcontractor to Baltic Control which carries out Welfur audits in Finland."¹¹ The Finnish Fur Breeders' Association owns 38% of the stock of the company Luova, and in recent years several of its assessors have been shown to have ties to the fur industry. A Luova brochure¹² revealed that one of its fur farm assessors is married to a fur farmer

and she helps out at the fur farm and is also listed as a deputy board member of a fur farm, a second assessor is described as 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.¹³ Saga Certification is another scheme under the Furmark marketing brand, and it was devised and launched by ProFur the Finnish Fur Breeders' Association back in 2005.

All fur farm assessment visits in Europe (under Welfur) and the USA (under Standard Guidelines for the Operation of Mink Farms in the United States) are announced or pre-arranged with the farm, so the farms have warning that would allow them time to remove anything unfavourable such as dead or injured animals, rendering these visits significantly unreliable as evidence of 'normal' conditions. To get Welfur certification, a fur farm must be visited as little as 3 times in the first year and then just once every year after that. In the US, the timing of the audits "will be scheduled every 14 to 17 months as to allow consecutive audits to encompass the 3 production phases of the annual production cycle".¹⁴

In addition to examples of lack of independence within certification schemes that form part of Furmark, there also appears to be no substantive plan for Furmark as a whole to verify compliance within the schemes it gives its marketing name to.



8 Furmark offers no consistency of standards and certifies ‘the least worst’ conditions:

Furmark is a marketing and public relations scheme that has been retro-fitted around two existing European fur farm certification schemes (Saga Certification and Welfur); an assemblage of laws and codes for fur farming in the US/Canada (‘North American Farm-Raised’); an assemblage of laws and codes for trapping in the US/Canada (‘North American Wild Fur’) plus a dressing/dyeing certification scheme developed by the International Fur Dressers and Dyers Association (IFDDA). It is essentially a montage of disparate certification efforts at the regional, national or local level. As a certification mark, its strength and value can only be as good as the weakest element of its component parts – for example a Furmark branded garment could contain fur from coyote that had partially chewed its own leg off in a leg-hold trap, or fur from a mink that had been partially cannibalised by a cage mate.

The certification schemes under the FURMARK umbrella do have in common that they reward and recognise the ‘least worst’ conditions. None of the schemes under Furmark measure what animal welfare scientists would recognise as good welfare in absolute terms, drawing on established and credible models such as the Five Freedoms or Five Domains of animal welfare. In Europe (Welfur), they simply rank fur farms in relation to each other ie: a sliding scale of best to worst in the context of what is a fundamentally flawed battery cage system. It identifies the ‘least bad’ of those fur farms and labels them as ‘good’ in relation to others.

Although Furmark purports to ensure “strict requirements that reflect the strongest, globally-recognized animal welfare and sustainability standards” in practice most of the schemes under Furmark require little or nothing more than the most basic legal requirements. The Welfur scheme under Furmark even requires lower standards than the law in some EU countries, for example Germany requires swimming water for minks and both Germany and Sweden require digging substrate for foxes¹⁵, whereas Welfur does not. Similarly, many of the requirements for environmental protections in dressing and dyeing are basic legal requirements in the EU, for example verifying that end products comply with the EU’s REACH chemical testing regulations, and allowing government inspections of factories.





9 Furmark does not cover around 50% of global fur production:

Furmark lacks transparency over which fur farms are covered across Europe and North America, however it does not include any fur farms in China, even though China bred and killed around 40 million animals for fur in 2019 and is the largest fur-producing nation in the world.¹⁶ And while Furmark lists a certification programme focused on farmed sable from Russia, it appears not to include other animals, such as foxes and mink, who are also farmed in Russia for their fur. Furmark also provides no coverage for chinchilla fur. A significant amount (estimated around 30%)¹⁷ of fur produced on farms is sold directly to fur brokers and does not enter the usual auction supply chain route. Therefore this fur would also appear to not be captured by Furmark's traceability scheme.

10 Furmark's Welfur scheme claims false credibility:

Fur industry bodies such as Fur Europe make misleading claims suggesting that the content of the Welfur certification scheme is approved or endorsed by the European Commission.¹⁸ It is not. Welfur simply appears on a database of available self-regulation which is managed by the European Economic and Social Committee (EESC). Seeking the credibility it lacks, the fur trade has extensively implied that this equates to EC endorsement. Officials at the EESC have confirmed that it does not validate individual schemes, it simply provides information on self-regulatory schemes introduced by industry bodies in the EU.¹⁹

Furthermore, despite claims by Furmark that "Certification programmes and their individual protocols must be science-based and approved by independent experts", two major science projects underpinning Welfur are known to have received funds from and been coordinated by the fur industry: The Welfur paper, "The development of on-farm welfare assessment protocols for foxes and mink: The Welfur project"²⁰, published in 2012, notes "EFBA [European Fur Breeders' Association] is acknowledged for funding and coordination of the Welfur project". In addition, the Finnish Fur Breeders' Association stated in 2017 that "The Finnraccoon welfare-studies needed to complete the Welfur-protocol, are ongoing, and funded by FurEurope and ProFur."²¹ A recent 2020 paper on the effects of housing conditions on raccoon dogs²² was financially supported by Fur Europe, Finnish Fur Breeders' Association and Natural Resources Institute Finland.





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REFERENCES

- 1 Federation of Veterinarians of Europe letter to One Voice, France, dated 17.02.2020
- 2 Welfur Assessment Protocol for Foxes, March 2015, pp.48. www.sustainablefur.com/wp-content/uploads/2018/11/WelFur_fox_protocol_web_edition.pdf
- 3 Finland Veterinary Association, June 2010 www.sell.fi/sites/default/files/lausunnot/stkl_sertifiointi_20100604_2.pdf
- 4 Veterinary Ireland Policy on Fur Farming 2018 www.veterinaryireland.ie/images/Veterinary_Ireland_Policy_on_Fur_Farming_22.11.2018.pdf
- 5 Certified Cruel: Why Welfur Fails to Stop the Suffering of Animals on Fur Farms. Fur Free Alliance, 2020 www.furfreealliance.com/wp-content/uploads/2020/01/CertifiedCruel_FFA-Research-Report.pdf
- 6 Welfur Assessment Protocol for Mink, pp.44. www.sustainablefur.com/wp-content/uploads/2018/11/Mink_protocol_final_web_edition_light.pdf
- 7 Welfur Assessment Protocol for Foxes, March 2015, pp.84. www.sustainablefur.com/wp-content/uploads/2018/11/WelFur_fox_protocol_web_edition.pdf
- 8 Born Free USA, Investigation: Victims of Vanity (2011): www.bornfreeusa.org/campaigns/trapping/victims-of-vanity-2011/ and Investigation: Victims of Vanity II (2016): www.bornfreeusa.org/campaigns/trapping/victims-of-vanity-ii-2016/ and 2017 Trapping Report: www.bornfreeusa.org/campaigns/trapping/trapping-report-2017/
- 9 Quoted in Opinion of the European Economic and Social Committee on the 'Proposal for a Directive of the European Parliament and of the Council introducing humane trapping standards for certain animal species' Brussels, 16 December 2004
- 10 You Gov poll, commissioned by Humane Society International/UK, May2021. docs.cdn.yougov.com/30o56gidav/HSIResults_Fur_210512_W.pdf
- 11 Luova website: www.luovaoy.fi/en/luova
- 12 Fifur (2019). Vastuullisuuskatsaus 2019 (Sustainability Report of the Finnish Fur Sector). www.fifur.fi/sites/default/files/fifur_vastuullisuuskatsaus_2019_4.pdf (accessed 16.01.2020)
- 13 Luova oy (2017). Kontaktblad (Contact Sheet for the Research Company Luova), Luovaoy. www.luovaoy.fi/sites/default/files/upload/file/luova_kontaktblad_pdf.pdf (accessed 16.01.2020) - page no longer available (28.01.2021)
- 14 Welfur Briefing 2018, FurEurope www.sustainablefur.com/wp-content/uploads/2018/12/WelFur_Briefing.pdf & Standard Guidelines for the Operation of Mink Farms in the United States, 2019 Edition, Fur Commission USA, pp.3. www.furcommission.com/wp-content/uploads/2019/10/SGOM-Book-2_Audit-InstrumentG.pdf
- 15 Animal Products Trade Prohibition Act, Germany. www.gesetze-im-internet.de/khfeverbg/TierErzHaVerbG.pdf and Animal Welfare Ordinance, Sweden. www.government.se/information-material/2020/03/animal-welfare-ordinance-201966
- 16 China, CLIA www.chinaleather.org/front/article/111466/; Europe, FurEurope efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2021.6459; United States USDA usda.library.cornell.edu/ and www.fishwildlife.org/afwa-inspires/furbearer-management; Canada Statistics Canada, www.statcan.gc.ca/eng/; Russia www.fedstat.ru/indicator/42321 and All Russia Agricultural Census
- 17 Pers.Comm. Mike Moser, former Director of British Fur Trade Association, dated 01.02.2021
- 18 Fur Europe newsitem, dated 16.01.2019 www.sustainablefur.com/news_item/welfur-gets-the-stamp-of-approval-by-european-commission/
- 19 PersComm. Email from EESC to HSI, dated 16.01.2019
- 20 The development of on-farm welfare assessment protocols for foxes and mink: The Welfur project, 2012. www.researchgate.net/publication/236658680_The_development_of_on-farm_welfare_assessment_protocols_for_foxes_and_mink_The_WelFur_project
- 21 Pro Fur submission to European Commission, Commission Implementing Act updating the List of invasive alien species (IAS) of Union concern, dated 29.03.2017 www.ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/1066-Commission-Implementing-Act-updating-the-List-of-invasive-alien-species-IAS-of-Union-concern/F1476_en
- 22 Effects of housing conditions on behaviour and physiology in the Finn raccoon (*Nyctereutes procyonoides ussuriensis*). www.ufaw.org.uk/downloads/koistinen-2020.pdf

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