

Landbruk- og matdepartementet  
Klima- og miljødepartementet

## Høringsuttalelse NOU 2014:15 – Norsk Pelsdyrhold

Fur Europe is the umbrella organisation covering the entire fur value chain with activities in 28 European countries. Fur Europe is based on the values of openness, transparency and reliability and pursues the continued sustainable development of the European Fur Sector with regards to economic, societal and environmental issues.

We would like to underline that the Norwegian Fur Farmers already have a strong national animal welfare regulation in place and that the fur farmers in Norway are interested in developing their business further in a sustainable manner. They have published several own-initiative reports and made commitments to strengthen the animal welfare as well as addressing the concerns of the public by making open farm events. Fur Europe believes that Norway should allow the sustainable continuation of a business that positively contributes to Norwegian economy, especially in rural areas.

Fur Europe welcomes the work done by the Norwegian committee and final report NOU 2014:15. Several of the discussions in the report are relevant not only for Norway but for the entire fur industry. We would like to provide further input to some of the recommendations made by the Committee.

### **Animal welfare assessment – documentation, reporting, transparency**

In 2009, Fur Europe initiated the WelFur Programme asking independent scientist from seven European universities to develop an assessment program inspired by the European Commission's Welfare Quality® Project. The consensus both in Welfare Quality® and in WelFur is based on the four welfare principles that are broadly recognised in the scientific community: good housing, good feeding, good health and appropriate behaviour. The scientists started their work with an in-depth review of all existing animal welfare research on fur animals before they identified the relevant welfare indicators and measurements most adequate for fur animals. With the WelFur programme there were 23 species specific measures selected to assess the welfare of foxes and 22 species specific measures selected

of minks. The measurement are either resource-based, management-based or animal-based. More than half of the measures for both fox and mink are animal based.

Based on this extensive scientific research, WelFur is unconditionally the world's most advanced animal welfare assessment programme to be rolled out on continental level. The pan-European implementation begins in 2015 with 10 countries participating in the pilot scale with more than 130 visits scheduled. Norway is among those 10 countries that will be the first to test the programme. In the future, this program will serve as an excellent documentation system for animal welfare at farm level and serve as the basis for constant improvement in farm management.

We believe that WelFur can provide answer to the recommendation highlighted by the committee. The program is built on transparency and the results of the independent assessments will be publically available, as it is also already the case for the inspections made by the Norwegian Authorities. There has also been a data-tool developed to easily gather the data at farm level and report that directly to a central database. The WelFur programme is measuring animal welfare from various angles. WelFur suggest to perform three farm assessments the first year in order to establish a baseline welfare status for the individual farm. Once the baseline is established, the farm assessment will be one visit per year, but in three consequent years the assessment is performed during three different periods in order to take the biological life cycle of fur animals into consideration.

WelFur is an industry initiative, but it should be underlined that at a number of occasions the European Commission has highlighted the program as a best practice example. We believe that this work can and will contribute to the legislation developed at EU level regarding animal welfare assessment. EU's animal welfare strategy 2012-2015 can be developed into a new animal welfare framework law, which most properly will build on an indicator-based animal welfare assessment system.

### **Housing conditions**

The report NOU 2014:15 describes that there is a need for further development of the housing conditions for mink and fox. Fur Europe do not support this point of view, as there are already several studies on this issue and as there is no scientific basis for concluding that the welfare of the animal is poor. The important measure when assessing animal welfare in connection with housing, is the criterion of "ease of movement". Larger cage sizes do not in themselves improve welfare in terms of decreased frequencies of abnormal behaviours (e.g. Hansen et al 1994, 2007), but only may, together with other factors (e.g. increased complexity), have positive effects on behaviours (Jeppesen et al 2000). Therefore the space and the height limits for satisfactory welfare level in WelFur have been set according to European recommendations. For foxes, increasing the cage area above the level of the European recommendations either had no effect on locomotor stereotypies and adrenal function (blue foxes: Korhonen et al 2001a; silver foxes: Ahola et al 2002) or increased the occurrence of stereotypies and cortisol excretion (blue foxes: Korhonen et al 2001b). Therefore, the acceptable limit for available cage area in WelFur is set at the same level as

for the European recommendations. Fur Europe believes that the EU recommendation are adequate and should not require further adjustment.

### **Protect biodiversity and farm security**

Fur Europe has engaged actively in the debate on this topic at EU level. In 2013 the European Commission presented an EU Regulation (1143/2014) on prevention and management of the introduction and spread of invasive alien species. Fur Europe has, in connection with that work repeatedly stated publically that the fur sector supports fencing regulations and that we do encourage our members to put up fencing. Fur Europe find it important to identify appropriate solutions to tackle invasive alien species and to protect both biodiversity and the environment. Fur Europe has been referring to the Danish Regulation on fencing as we see it as the most effective way of protecting the farms. There is similar legislation in place in Spain.

In order to reduce any potential adverse impact on biodiversity it is important to underline that the fur sector proactively engages with other communities, e.g. the European hunters on training and knowledge about trapping of mink. In Denmark the authorities publish annual statistics and we can see that there is a clear decrease of the mink in nature after the fencing was put in place. The Norwegian Fur Breeders' Association is also engaging proactively in this debate in order to prevent minks from escaping the farms.

### **Conclusion**

In conclusion Fur Europe would like to highlight that we support the sustainable development of the fur sector in Norway and that the Norwegian fur farmers have already engaged actively in improving animal welfare standards. The Norwegian Fur Farmers have always been very active in the European fur community and play an important role in the development of the fur sector and have been keen on getting the newest knowledge and research available. We would also welcome the fact that the report is considering more state funded support on fur farming. We urge the Norwegian government to support the recommendation of the committee to continue fur farming in Norway.



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