

Finnish Fur Breeders' Association's Statement: To whom it may concern,

Concerning: "Saksnummer 18/1305: Høring – forslag til lov om forbud mot hold av pelsdyr"

Norwegian Fur Branch is a vital part of the Scandinavian fur breeding value chain and circular economy

From the Finnish fur industry's point of view, it is of vital importance that Norwegian fur production remains part of the Nordic fur industry also in the future. The Norwegian fur industry has a 100-year-long history, and it has been one of the most successful lines of business in rural areas. The Norwegian fur industry has always been engaged in quality cooperation with our Finnish industry, and many Norwegian farms have been certified in accordance with the Finnish farm certification system.

Finnish farm certification system (Finnish Standards Fox/Mink/Finnraccoon) acknowledges the Norwegian certification system FarmSert. Norwegian farms are also members of the WelFur system that covers the whole of Europe and is recognised by the European Commission. Many Norwegian mink pelts, and especially fox pelts, are sold abroad via the Finland based auction house Saga Furs Plc's auction. Due to their excellent quality, a significant number of silver foxes are imported to Finland from Norway to be used as breeding animals. This is hugely beneficial to the Finnish silver fox population breeding work as well as the diversification of the heredity of the animal population.

The fur industry is an important export sector for Finland; in the 2010s, it has earned Finland between 300 and 810 million euros per year as net export income. In Finland, the fur industry directly employs approximately 5,000 people, with the cumulative effect estimated at three times that number. Fur production is a major consumer of feed materials acquired from the rural areas (abattoir by-products, grain feed) and seas (Baltic herring and fishing by-products) and hence, an important part of the circular economy of the rural areas. The fur industry is a bioreactor in which everything circulates and the income from certified pelts remains in Finland.

Operated by local entrepreneurs, not some faceless corporation, the Nordic and Finnish fur industry and its partner network (e.g. feed production, transport services, construction) play an important role in municipal economy. For many municipalities, the provision of basic services is fully dependent on the industry tax revenue. These value chains are identical in Finland and Norway.

In Norway, fur animal breeding is a hugely important consumer of fishing industry by-products (fish leftovers). Without the fur industry, fishing by-products would create a waste problem in Norway. In 2015, the Netherlands decided to end fur animal breeding with a 10-year transition period. The approximately 4 million minks bred in the Netherlands consume as part of their feed the abattoir by-product, which would otherwise become biowaste. Now, with the fur animal breeding discontinuation date approaching, this future biowaste problem is becoming a source of concern in the Netherlands. According to the Dutch fur breeders' association, a number of politicians have said that the policy to end fur breeding on ethical grounds is wrong and the decision should be reconsidered.

This shows how important an element of the circular economy of the food and feed chain fur animal breeding is in each country – including Norway.

Finnish politicians and decision-makers understand the importance of the industry, and there is no ongoing debate in Finland regarding the discontinuation of the industry – on the contrary, the Parliament is

currently working on a government proposal on animal welfare, which would profile Finland as the number one country in Europe in animal welfare. Nordic cooperation to promote animal welfare and sustainable rural industries is important, and we hope that responsible fur farming will also continue in Norway.

ETHICS

Ending the practice of fur farming is often justified on ethical grounds. In this debate, it is good to keep in mind that ethical reasons cover a lot of ground: In this era of plastic waste, it is valid to ask how ethically justified it is to end an industry that provides a true alternative, a natural product that is decomposable and recyclable. What is unethical is to spoil our oceans with plastic waste and phosphorus. The fur industry removes phosphorus from the Baltic Sea and introduces a natural product to replace artificial fur. At the end of the day, the key question from the aspect of ethics is surely this: Do humans have the right to decide on the fate of an animal in the first place? A fur animal is used entirely. Nothing goes to waste. The carcasses are turned into bio diesel, bio fuel and feed. Because there is enough meat available for human consumption from other sources, it has not been deemed necessary to eat the meat of fur animals, which is instead used in other ways to support the natural cycle.

ECONOMIC FLUCTUATION AND BACKGROUND

The fur trade is part of the global market economy and fully dependent on demand and the production volume. The economic fluctuation is great. The price of fur reached its high-water mark in 2013. At that time, the production volumes also grew with the demand in Finland as well as other countries of production. After the production peak and increased supplies, the price level of pelts has dropped sharply. Indeed, the last few years have been challenging, especially for mink, fox and Finnraccoon breeders around the world.

The increase of prices is currently stunted by the global oversupply of pelts and garments resulting from overproduction, which will take time to dismantle. It is a well-known fact that fur production is cyclical, and the production of pelts is now estimated to sharply decrease in the years to come. This also has a positive effect.

It will provide a solid foundation for the price increase of certified Finnish and Norwegian pelts in the next few years. Finnish and Norwegian fur production is well-known around the world for its responsibility and traceability. The market will become healthier and begin to move on once the old supplies have been used up and the overproduction levels off.

Nowadays, the clothing industry demands responsibility, traceability and transparency. This applies to all clothing industry raw-material procurement, and Western fur production has the opportunity to conform to all of these criteria.

FOR FUR FARMERS, THE WELFARE OF ALL ANIMALS IS AT THE CORE EACH DAY

For responsible fur farmers, animal welfare is at the core of all operations. Ensuring welfare is the number one priority. The globally esteemed Finnish certification system, which Norwegian farms also comply with, is based on this idea.

For these reasons, among others, the welfare of fur animals is at an excellent level both in Finland and Norway:

- Certification: ProFur's *Finnish Standards Fox/Mink/Finnraccoon* (since 2005) farm certification is the most comprehensive in the global fur industry. It includes the WelFur assessment protocol – recognised by the European Commission and covering all of Europe – introduced in 2017, and naturally legislation. The Finnish system acknowledges the Norwegian system.

- Control: operations controlled by the authorities (protection of animals, business, environment, fire and rescue operations, building control)
- Health: comprehensive animal welfare and medical services
- Safety: the animals are provided with a safe, stress-free lair, clean water and quality feed, familiar keepers and no unwarranted transport even at the end of production animals' life-cycle
- Company: effectively, the fur animals to be skinned spend their entire life with their mother or litter
- Stimuli: taken care of every day at each round
- Research: the industry's own laboratory and pharmaceutical wholesaler Fin FurLab as well as extensive research activities, including universities. Services are also provided for Norwegian producers.

EVERYTHING IS RECYCLED – GENUINE FUR IS AN ANSWER TO THE GROWING MICROPLASTICS PROBLEM

- The fur industry was engaged in circular economy already before the terms 'circular economy' and 'bioeconomy' were even invented for wider use.
- By-products of the food and meat industries as well as the leftovers of the fishing industry have always been used for fur-animal feed. The carcasses of fur animals are also used as part of feed manufacture pursuant to the feed and by-product legislation.
- Baltic herring and other small fish fished for fur-animal feed remove approximately 150 tons of phosphorus from the Baltic Sea annually.
- So in practice, the fur industry removes an amount of phosphorus from the Baltic Sea comparable to the load of the sewage treatments plants of all of the big coastal cities of Finland.
- Fur animal manure is used to produce biogas for the use of, e.g. industry and traffic.
- Fur animal manure is used to produce growth platforms rich in nutrients for greenhouse, balcony and roof farming, and composted manure is used as fertiliser in field husbandry.
- Fur animal fat is used to manufacture bio diesel.
- The plastic waste and microplastics problem of the world's waterways and environment is severe, and the use of plastic-based clothes with a short life-cycle exacerbates the microplastics problem.
- The increased use of genuine fur clothing in countries in the sub-zero temperature zones may alleviate the problem with microplastics.
- Genuine fur has a sustainable life-cycle, and the material is natural and fully decomposable. Fur decomposes at the same rate as, for instance, a leaf of an oak tree. As much was most recently confirmed by an independent study ordered by Fur Europe, the first part of which was published in summer 2018.
- The operating methods of the certified Finnish fur industry are sustainable and in compliance with the principles of circular economy.

[https://profur.fi/sites/default/files/fur_industry - circular_economy_and_benefits_0.jpg](https://profur.fi/sites/default/files/fur_industry_-_circular_economy_and_benefits_0.jpg)

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