



British Fur Trade Association
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Taiwo Owatemi MP
House of Commons
London
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23rd April 2021

Dear Ms Owatemi,

UK FUR SECTOR: THE CONSEQUENCES OF YOUR PROPOSALS

We are responding to the points made in relation to the Ten-Minute Rule Bill that you introduced to Parliament on 21st April that seeks to ban the sale and import of natural fur. If enacted, your proposals would have a profoundly damaging impact on those involved in the sector, including members of the British Fur Trade Association (BFTA).

We met on 16th April when we highlighted our serious reservations about your proposals. We also provided a comprehensive briefing on the extensive regulatory regime that the fur sector operates in, the role of international bodies such as CITES, and the extensive assurance schemes that are in place to ensure standards in animal welfare. We note that you chose to ignore these points in introducing your proposal.

When asked during this meeting why you were progressing with your Bill, you cited two reasons; "because of conditions on farms" and to stop the "issue of mislabelling" (of fake or faux items containing real fur). You did not provide evidence to substantiate either of these points. It is noticeable that your proposal would do nothing to address either issue. Further, your speech was unevicenced, one sided and based on a misrepresentation and lack of knowledge of the sector propagated by those groups advocating a ban, and who you acknowledged in our meeting are advising you. Further, you made no mention of the numerous negative consequences that your proposal would have.

I am therefore taking this opportunity to set out the facts, to correct the misinterpretations and to detail the consequences of what you are proposing, including its impact on BFTA members. Suffice to say we believe that your proposals are fundamentally flawed, based not on evidence or facts, but on the views of those animal rights groups who have long campaigned against the fur sector.

As we set out during our meeting, the UK fur sector is committed to the highest possible standards of animal welfare and is based on stringent international, national and local laws and standards including the Agreement on the International Humane Trapping Standards (AIHTS), of which the UK is a signatory, and those originating from CITES, of which the UK is an active member. There are also extensive animal welfare assurance schemes in place based on independent scientific and veterinary research reinforced by third party inspection including Welfur, the programme that covers European fur farming, recognised by the European Commission as an example of best practice. Fur from the

EU, subject to the Welfur scheme, accounts for around 95 per cent of the fur entering the UK. In addition, the fur sector will this year launch FURMARK, a global welfare certification and traceability scheme that will incorporate a range of species-specific farm raised and wild fur programmes complete with third party inspection providing full visibility and transparency and a revised labelling scheme. We sent you the detailed information, including the protocols, on which such assurance schemes are based. You chose to ignore this.

I now address directly the two reasons you cited as justification for introducing your proposal.

Banning natural fur sales and imports in the UK will not improve standards in animal welfare and would do nothing to change how fur is produced in other countries including 'conditions on farms'. This view is shared by the Secretary of State for DEFRA, George Eustice MP, who said, in Parliament, in 2018 that, *"It is not possible to make a difference just through the restriction on trade to the UK, because we represent a tiny portion, about 0.25 percent, of the entire global market. We would probably be more effective agitating for change through international forums such as the World Organisation for Animal Health, CITES and others¹."* Simply banning fur in the UK would not end the international fur sector or trade in fur-bearing animals. It would do nothing to influence standards on farms in other countries, that we are able to legitimately say are among the highest in any form of animal husbandry. It would though diminish the UK's position in the eyes of many countries for whom fur is a major commodity and export. The UK's voice to influence and drive up and improve animal welfare standards globally would be reduced.

The other point you raised in our meeting as justification for a ban in the UK, that of mislabelling, you failed to mention at any point in your speech. Your proposal of course would do nothing to address the issue and indeed would make the problem worse; this is because a ban itself would still allow the import and sale of that type of fur (as it would not be covered by a ban). A ban would not tackle the problem that needs to be addressed at the point of production, that does not happen in the UK. Instead, it would exacerbate the problem as more people outside of the UK try to pass off real fur as fake, exempted under your proposals, because they would still need to find a market for their products.

Further, a ban would forcibly close a whole industry for what have been relatively limited number of cases. So called 'mislabelled fur' is of course sold at entirely different price point and bears little in common to the fur garments produced and sold by BFTA members. Your proposal would simply penalise those that do wish to buy natural fur in the UK and those UK furriers, designers and retailers who are dependent upon it for their livelihoods and abide by all rules and regulations. If the issue is therefore to stop mislabelling then there are more effective ways of tackling this than introducing a catch all ban such as better enforcement, declaration at point of entry and a Government backed revised labelling scheme (in addition to the industry rolling out its own revised labelling with Furmark). We fully support such activities and is why we are taking forward discussions with officials in BEIS.

You cited as justification for your proposal an apparent groundswell of public opposition to the continue sale of fur. You referenced polling conducted by the group HSI and a petition run and organised by the same organisation. We would strongly disagree that either of these measures are sufficient and robust enough to justify such a claim. On the latter, we have repeatedly asked HSI UK to clarify how many signatories originated in UK and how many are multiple sign ups or from the same IP address. We are still awaiting this information. Our own polling shows that there is no

¹ Rt Hon George Eustice MP, Secretary of State for Environment, Food and Rural Affairs, 4th June 2018

majority in favour of restricting fur in UK, the vast majority of British people support the use of animals for both consumption and in clothing whilst 97 percent of the British people believe that banning fur should not be a Government priority. This then is not a 'very small minority' in favour of allowing the continued sale of fur as you contend. I would also point out, that sales of natural fur in the UK have increased by over 200 percent in the last ten years, particularly among younger age groups, as environmentally conscious consumers increasingly reject the mass-produced non-renewables epitomised by the fast fashion crisis and search out long lasting, sustainable natural materials. As fur sales continue to be strong, this clearly shows that there is no groundswell of opinion demanding action.

You made direct reference to the media campaign orchestrated by the Daily Mirror as further justification for your proposal and evidence for its support. Following a formal investigation in January 2021, the Press Complaints Commission ruled that the launch piece calling for a UK fur ban ran by the Daily Mirror in July 2020 that tried to smear the British fur sector with inaccurate and baseless accusations was 'significantly misleading' with the paper ordered to publish a correction. It is clear therefore that the material published in the Daily Mirror regarding the fur sector cannot be trusted. We sent a copy of this ruling to you following our meeting and you can read it in full here: [Ruling \(ipsos.co.uk\)](https://www.ipsos.co.uk)

The reality of a UK fur ban is that it would punish consumers, legitimate retailers, and those that deal in legal, high-quality sustainable and certified furs whilst putting huge strain on law enforcement. Banning fur in the UK would of course not end demand but move it underground, untaxed and unregulated and into the hands of those that care little about standards in animal welfare. It is likely that much of trade would simply move online. Indeed, this was recently highlighted in July 2020 when a Federal Court in San Francisco recognised that the fur ban in the city could not apply to online sales with the Court stating that "Retailers who want to sell fur to San Francisco residents may do so online."

A ban would be unenforceable leaving HMRC and Border Force trying to monitor and police thousands of parcels and shipments as they are imported into the UK every week. Whilst the Police and Trading Standards would be expected to try to police the internal market once furs had entered the country deciding what was a new fur and what fur was second hand, the latter that would be exempted under your proposals. Also, under your proposals, law enforcement would be expected to decide and police if someone was wearing a fur item as a mark of faith or as a fashion accessory, the latter being banned under your proposals. Quite apart for the time, resources and challenge of being able to do this, you appear to be suggesting that the state should effectively police what people should and should not wear.

A fur ban in the UK would be bad for the British economy and would be bad for consumers by restricting personal choice. The fur sector in the UK provides jobs, both direct and indirect, to thousands of people and sustains hundreds of businesses. Many of these jobs are highly skilled and specialised in SMEs across the supply chain such as retail, fashion design, manufacturing and logistics. It would also impact on our recovery from the damaging economic impact of the pandemic whilst diminishing London as a global fashion, design and retail centre. For the avoidance of any doubt, natural fur is used by major brands and appeared at London Fashion Week in both 2019 and 2020. Your proposals would of course end the livelihoods of those members of British Fur Trade Association, many of whom are family businesses that have been in operation for generations, and who abide by exacting standards in animal welfare and a strict code of conduct.

A ban would negatively impact on the environment, the UK's desire to be a leader in tackling climate change and would directly impact on this country's ability to meet the ambitious targets around carbon emissions that the Prime Minister announced this week. This is because, banning natural fur, would simply push increased sales of oil based synthetic materials, characterised as the 'fast fashion' crisis. It is utterly illogical that in the same year that the UK is hosting the UN global climate change conference, your proposal would result in an increase in sales of synthetic clothing (that have a long track record of being made in appalling conditions in developing countries) at the expense of a biodegradable, natural material.

Your proposals would adversely affect First Nation indigenous groups in places like Canada and Greenland, who sell directly into the UK market and who depend on fur for their continued way of life. Such fur comes from animal conservation schemes where the population of the animals need to be managed and controlled. When asked during our meeting if your proposal would include fur from such conservation schemes you replied you did not know and stated that you would need to do your research and speak to the (animal rights) groups that were advising you.

The fur trade sector in the UK is worth over £200 million per annum and is dependent upon imports of materials from many of this country's closest trading partners and allies including the EU, Canada and the USA. Finished items and garments are imported from countries that include Italy, France, Spain and Greece; the UK is the second largest market for exports from both Italy and France. And yet your response to such trade was to argue that the British Government should expediate a ban before it would be 'too late', and trade deals would make it impossible to do so. This is a grossly irresponsible justification for moving forward with a piece of legislation that would have profound impacts, directly on thousands of people who are employed in the sector, and on the relations with these countries. Indeed, we believe it would send entirely the wrong message if one of the first acts of a post Brexit Britain was to impose restrictions on a highly regulated global sector governed by international agreements and laws simply because of the demands of small number animal rights groups who do not represent the views of a majority of the British public or Members of Parliament. For the record, Canada, the US and multiple countries across the EU have already raised their concerns about the impact of a unilateral UK fur ban.

Your comments regarding the Queen's Guards were both crass by involving Her Majesty the Queen in a political debate and showed your lack of understanding and research of why the Ministry of Defence chooses to continue to use real fur. The MoD conducted trials in 2014 that concluded "that the faux alternative did not reach the standards needed to provide an effective replacement to bearskin pelts. The synthetic showed an unacceptable rate of water absorption which would lead to caps becoming waterlogged and heavy, not only presenting a health risk to the soldiers but also causing the caps to lose their appearance."² Such fur comes from animal conservation schemes in Canada where populations need to be managed, it is therefore a by-product.

The UK fur sector is ready to work with Government to design and operate within a system that would provide the necessary assurances around the provenance of natural fur entering this country and to further enhance the standards already in place, schemes already working well in other countries. But let us be very clear about your proposals. Imposing a ban on the fur sector will cost thousands of British jobs, shut hundreds of business and impact on consumer choice. These are basic, undeniable facts. Such a move is not supported by a majority of people in this country. A ban would have no impact on improving animal welfare but would damage trading relations with some of our closest allies including the US, Canada, and many countries in Europe. We strongly believe that on an issue with such profound and serious implications, Government policy making must be undertaken and governed by the facts, science, evidence, an understanding of the consequences

² Letter to BFTA from Army Secretariat, 12 December 2021

and be rigorously impartial and objective. It is clear from the arguments and justification that you advanced in introducing your proposals, you have failed in this respect.

We will, therefore, campaign vigorously to oppose your proposals.

I am copying this letter to the Secretary of State for Environment, Food and Rural Affairs.

Yours sincerely,

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The voice of the UK fur sector

cc. Rt Hon George Eustice MP, Secretary of State for Environment, Food and Rural Affairs